

EW EUROWAG

Providing sustainable solutions to go far.



Our purpose

To make the commercial road transport industry clean, fair and efficient

Eurowag is a leading pan-European integrated payment and mobility platform, focused on the commercial road transport (“CRT”) industry. We are helping the CRT industry to become more clean, fair and efficient through our comprehensive and unique suite of products and services – accessed via the industry’s first end-to-end digital platform. In order to meet the evolving requirements of our customers and stakeholders, we offer a comprehensive range of products that simplify the complexities and fragmentation inherent in the CRT sector and reflect the long-term trends of digitalisation and decarbonisation that are shaping the industry, now and into the future.

This Sustainability Report sets out to disclose our material impacts on people and the environment, including the material effects of sustainability matters in our business activities.

The report has been supplemented with additional contents and disclosures this year, in preparation for the Corporate Sustainability Reporting Directive (“CSRD”), and seeks to provide a step towards alignment with the European Sustainability Reporting Standards (“ESRS”). We anticipate that our 2025 Annual Report will be fully aligned with ESRS requirements and structure.

The Sustainability Report has been prepared on a consolidated basis. The scope is the same as for our financial statements and it covers our own operations, upstream and downstream value chains. The report follows the categorisation of short, medium and long-term time horizons

as defined in ESRS 1, section 6.4. We have incorporated the Task Force on Climate-related Financial Disclosures (“TCFD”) framework and used it for our climate risk analysis shared in Eurowag’s 2024 Annual Report and Accounts.

In addition to aligning towards the ESRS, our Sustainability Report incorporates disclosures required under the UK Modern Slavery Act. This includes detailed information on our policies, due diligence processes, and actions taken to prevent modern slavery and human trafficking within our operations and supply chains. By integrating these disclosures, we aim to provide a comprehensive overview of our commitment to upholding human rights and ethical business practices across all jurisdictions in which we operate.

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Our strategy

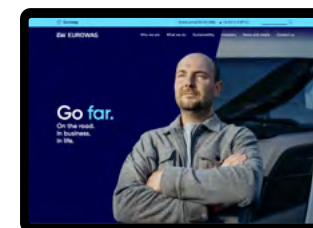
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Our commitment

We are committed to helping the CRT industry to become clean, fair and efficient



Jenny Pidgeon
VP Sustainability and CSR

2024 has been marked by significant developments, both positive and negative, in the ongoing battle against climate change, biodiversity loss and social inequality at a global level.

Political developments herald a shift in climate policies and actions. This could undermine global co-ordination on emissions reduction, just as 2024 marked the first full year during which the global average temperature exceeded 1.5°C above pre-industrial levels. Extreme weather events, from unprecedented heatwaves to devastating floods, have underscored the urgent need for climate action, while scientists have announced that the 1.5°C goal of the Paris Agreement is effectively out of reach, signalling the need for even more ambitious immediate measures to address the climate crisis.

Given the scale and urgency of the crisis, it can be frustrating to feel the slow pace of transformation in the CRT sector, which contributes ~9% of the total greenhouse gas ("GHG") emissions in Europe. Whilst growth in alternative fuel adoption is encouraging, including amongst Eurowag's own customers, scaling the energy transformation still faces

hurdles related to infrastructure, high costs and technological barriers. The next few years will be critical as the industry works to invest in sustainable technologies, improve operational efficiency, and deliver the decarbonisation required to mitigate climate change. Enabling and accelerating these outcomes continues to drive Eurowag's commercial and sustainability strategy, steered by our purpose to make the CRT industry clean, fair and efficient.

At Eurowag, we aim to reach net zero emissions by 2050. To achieve this, we have set a combination of short-term and long-term decarbonisation targets and associated action plans, both for our own operations and our value chain. Through our digital platform, data insights and growing Decarbonisation as a Service offering, we are in a unique position to help our customers improve efficiency and reduce emissions. Our investments in alternative fuel corridors, electrification and digital solutions help our customers operate more efficiently and transition from fossil fuels to alternative solutions more easily.

A central focus within our sustainability approach is promoting customer success and wellbeing. We want to tackle the root causes of the perceived low attractiveness of the CRT industry and help small and medium-sized enterprises ("SMEs") thrive by offering services at attractive terms

so that they can compete, succeed and transition – with our support – to a lower-carbon, digital future.

We are committed to making a positive social impact in our local communities wherever we operate. This year we ran our largest ever employee-led philanthropy programme and developed a number of partnerships with non-profits in our key markets, designed to positively impact outcomes aligned with our corporate purpose.

The strength of our Group's governance and culture underpins all our activities. In 2024 we undertook a Double Materiality Assessment ("DMA") which identified our material ESG impacts, risks and opportunities. We are now working to embed these insights into our daily operations. As always, success in achieving our commitments and goals relies on our people. Creating an inclusive workplace and engaging employees in delivering our purpose is core to building an outstanding culture. Whilst there is still much to do, our journey to supporting a lower-carbon, fairer, digital future is underway and remains steadfast in the face of regulatory and political uncertainty. Our Sustainability Action Plan, presented in this report, reflects our commitment to, and progress towards, our long-term ambition and we will update our strategy in 2025 to take full account of the outcomes of the DMA.



Despite current political and regulatory instability, we remain determined to accelerate the decarbonisation of CRT and support our customers in transitioning to a sustainable, lower-carbon future, with a focus on innovation, inclusivity, and long-term impact."

2024 highlights

Our year in numbers

Climate action

17%

reduction in direct emissions (Scope 1 and 2, on a market-basis) compared to baseline year 2023

1,537

active alternatively fuelled trucks using Eurowag products and services, almost double the previous year

63x

increase in HVO volume, with an expanded HVO and bioLNG refueling network, achieving ~20% bioLNG coverage

1st

electromobility service provider ("eMSP") launched for commercial road transport

Customer success and wellbeing

68%

of customers surveyed agreed Eurowag supported their business success

77%

of drivers surveyed agreed Eurowag supported their wellbeing and safety

Launched integrated Eurowag Office platform

Launched Loono partnership for preventative health and wellbeing for drivers

Opened new facilities for drivers at our truck parks

Held second Eurowag Truckers' Day and fifth annual Christmas celebration of truck drivers

Community impact

66%

of eligible employees participated in the Philanthropy & You programme for employee-led charitable donations – comprising 1,295 employees

275

local good causes supported across 17 countries

5

social impact partnerships in our key markets

0.8%

pre-tax profit donated, through employee-led donations, corporate charity partnerships and disaster relief

Responsible business

37%

women in leadership roles

84%

of employees completed human rights training

Undertook Double Materiality Assessment in preparation for CSRD

Developed sustainable procurement approach and tools

Launched Eurowag women's mentoring scheme

Governance

Sustainability governance

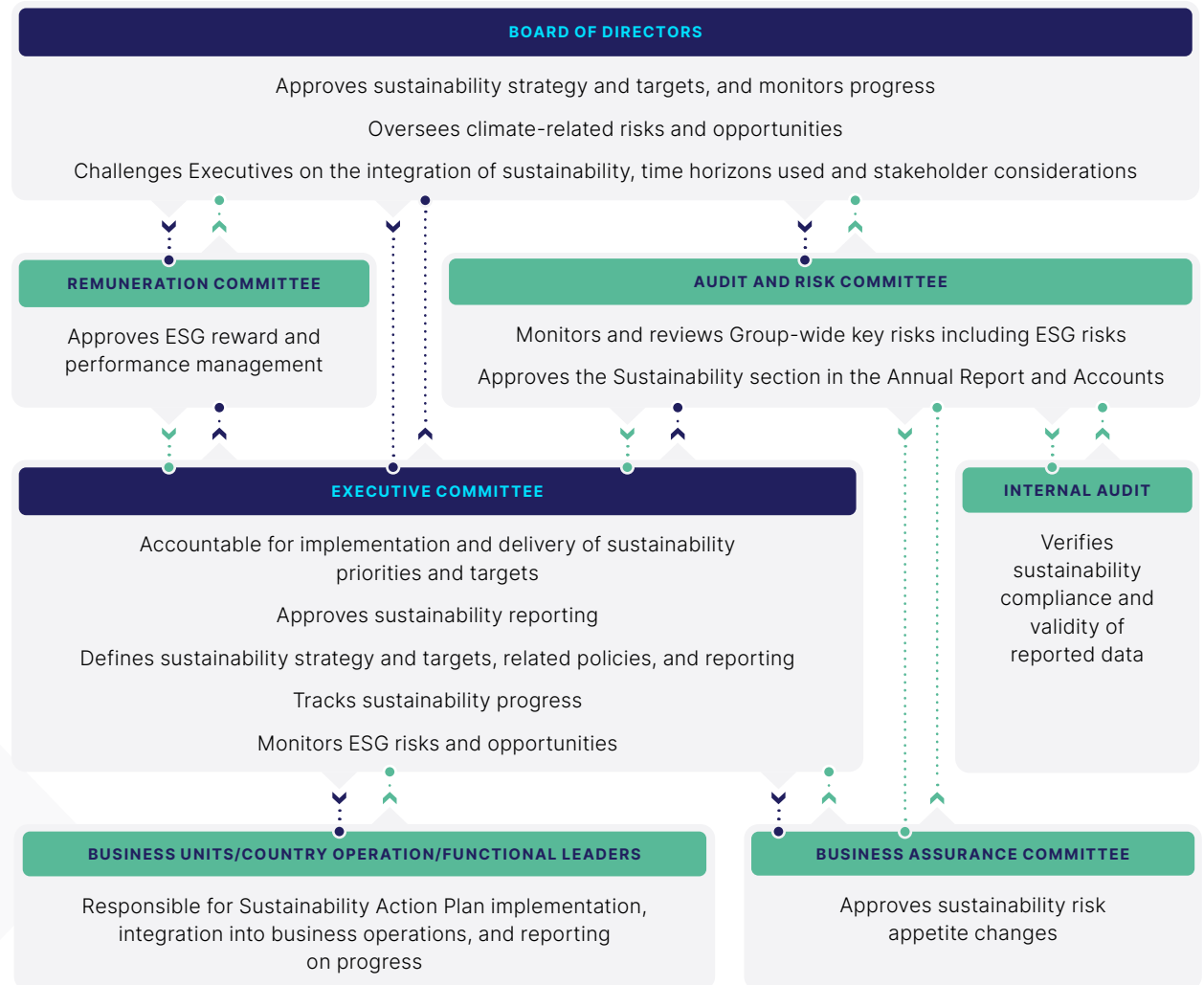
In 2021, we established a governance structure to oversee and monitor the implementation of our sustainability strategy.

The Board is ultimately responsible for sustainability, and initially delegated accountability to an ESG Executive Committee. In 2024, from Q2 onwards, we decided to take the next step of embedding sustainability into our operating model and governance, by integrating sustainability into the running agenda of our Executive Committee. The Executive Committee sets the strategic direction and tracks the progress of the Sustainability Action Plan, related policies and reporting, as well as monitoring relevant risks and opportunities. Sustainability features on the agenda at least once per quarter.

We have introduced a formal ESG Policy that codifies and sets out our governance and approach for integrating sustainability into our business, which is also used for monitoring and reporting on progress. We will update this policy in 2025 as part of our ongoing preparation for the CSRD.

We have a Sustainability function to help ensure sustainability is embedded into every part of our decision-making processes across the Group, through close working with representatives across the business, who are responsible for the day-to-day delivery of the sustainability strategy.

Sustainability governance framework



Governance continued

Risk management and internal controls over sustainability reporting

Managing risk plays an important role in the Group achieving its strategic objectives. As with all businesses, our risks evolve constantly, along with the environment in which we operate, so our risk management is an ongoing iterative process.

We have established a risk management and internal controls framework that enables us to identify, evaluate, address, monitor and report effectively the risks we face, to help us achieve a balance between risks and opportunities.

We established our risk management framework on the accepted system of three lines of defence and in accordance with the Financial Reporting Council's ("FRC's") guidance on risk management, internal control, and related financial and business reporting. Within the three lines of defence, the first line manages and "owns" the risk; the second defines a uniform management framework for each risk category; and the third provides independent confirmation of the effectiveness of the risk management and internal controls process.

The sustainability reporting process is mainly controlled by the system of the Group's internal controls. Our internal controls system is built on five components:

- › **Control environment:** the basis for an effective internal control system that reflects the Group's overall attitude and philosophy towards risk management and control (appropriate organisational structure, Code of Conduct, HR policies and guidelines, risk policies, etc.)
- › **Risk assessment:** establishing risk objectives, identifying potential events that could jeopardise the achievement of these objectives, evaluating identified events and optimising risks
- › **Control activities:** all measures and activities taken to prevent the identified risks from occurring as far and as effectively as possible
- › **Information and communication:** channels ensuring that relevant information about ineffectiveness is communicated to the relevant Executive bodies
- › **Monitoring:** regular monitoring activities performed by superiors, and second and third lines of defence

Our risk assessment that defines the most material risks related to sustainability reporting focuses mainly on the following topics:

- › **Governance:** organisational governance to ensure clear lines of responsibility, appropriate strategy development and budget allocation processes
- › **Legislation:** legal monitoring and compliance processes to ensure full alignment with all applicable legal requirements
- › **Climate change:** management of physical and transitional risks related to climate change
- › **Data quality:** ensuring that data reported is correct and verifiable

The identified risks are then evaluated, based on a standardised risk evaluation matrix that derives a risk score (risk priority) from defined probability of the risk's materialisation and anticipated financial and/or non-financial impact, in case of the risk's materialisation.

On each risk, the Group has defined mitigation controls that mitigate the risk, in line with the underlying risk appetite.

Each control has the following attributes defined:

- › Ownership and custodianship of the control
- › Frequency of the control performance
- › Required evidence for the control's effectiveness evaluation

- › Assigned sampling technique for the control's effectiveness testing

All controls are independently tested at least annually on their effectiveness by the Risk department.

The performed tests consist of:

- › **Test of design ("ToD"):** ToD is a test to determine whether measures are adequately designed to mitigate the identified risk to an acceptable level and are properly implemented. ToD of the internal control validates that the control that the organisation claims to have in place has actually been designed and implemented
- › **Test of effectiveness ("ToE"):** ToE is a test to determine whether measures are effectively working to mitigate the identified risk to an acceptable level. In the ToE, the required evidence per control is tested and thus its effectiveness is validated

Results of the internal controls testing are submitted to the Executive Committee and the Audit and Risk Committee. The Audit and Risk Committee regularly tracks non-effective controls and their remediation.

Business model

Creating value for our stakeholders

We take advantage of our rich history and unique access to data to help make the CRT industry clean, fair and efficient. Headquartered in the Czech Republic, but with offices and customers throughout Europe, we have a truly pan-European footprint.



What makes us unique

Pan-European fuel network

- › Our fuel card is supported at ~15,000 stations across Europe
- › We continue to focus on our alternative fuels network, while also fostering our traditional relationships with fuel suppliers across Europe

Unparalleled access to data

- › We capture data across every touch point of our customers' journey, and we leverage our insight into the CRT industry's needs, to help our customers transition towards a net zero future
- › Insight into the most efficient routes, refuelling options and cost optimisation
- › Mission critical-data to support SMEs

Speed and efficiency

- › One-stop shop – we can support our customers with most of their business needs, including one bill for all their products and services

- › Our toll solutions can be used in 23 countries across Europe, keeping our customers' trucks moving
- › Customers process their tax refunds digitally, saving them money and time
- › Our smart routing calculates the fastest and most efficient route for a truck, including the cheapest fuel along the route
- › Our driver behaviour feature identifies opportunities for emissions and cost savings

Trusted and loyal brand

- › Almost 30 years in the industry
- › We help our customers through financial services
- › Net Promoter Score ("NPS") of 40 (on a scale of -100 to +100)
- › We have loyal customers that stay with us for a long time

Value created for stakeholders

Customers

Engaging our customers in product development is an ongoing process that involves interviews, problem definition, collaborative idea generation, implementation, and measurement using customer insights and metrics.

Suppliers

Retaining and attracting vendors is essential for our business success, allowing us to offer competitive prices and high quality, while also ensuring that environmental and social issues are properly managed.

Employees

Our purpose and values guide every decision. With a culture that emphasises diversity, we foster a wide range of skills. We support employees in self-development through various initiatives.

Investors

Our business model, driven by resilient growth, delivers strong cash flow to create value for shareholders.

Society and the environment

Committed to making the CRT industry clean, fair, and efficient, we support our customers to make more carbon efficient journeys and drive initiatives that support our short and long-term decarbonisation goals, aligning our operations to EU net zero targets, whilst also focusing on giving back to our communities.

Policy makers, regulators, and government

We engage with regulators to ensure compliance with relevant requirements. We closely monitor policy and regulatory developments in Europe and our key markets.

Our sustainability journey

Embedding sustainability across our business

Our commitment to making the CRT industry become clean, fair and efficient has been our number one priority when shaping our sustainability journey.

Over the last four years, we have steadily matured our strategy and the breadth of our activities towards our long-term goals. 2024 has marked another important stepping stone in our journey as we continue to grow our understanding of which products, services and integration activities deliver the most impact.



Where we are

This year, the focus has been on reviewing our net zero roadmap, updating our targets to reflect the growing business, and on carrying out a Double Materiality Assessment, which enabled us to identify a wider set of environmental, social and governance impacts, risks and opportunities which are important for our stakeholders and for our business.

We also significantly increased our business development in Decarbonisation as a Service, with notable growth in our green fuel corridors and the launch of the first CRT-focused eMSP.

Where we're going

We will continue in our efforts to integrate sustainability into our operations, focusing our investment and actions on what adds most value for our customers, our business, and the environment. Next year we will strengthen the ESG governance in our operating model, developing new KPIs to help us track the impact of our Decarbonisation as a Service products, and ensuring clear ownership across the business for our sustainability initiatives and targets.

We will update our sustainability strategy and action plan to take account of the topics assessed as most important in our double materiality assessment, and work to develop policies, metrics and action plans for those material topics which are new to our strategy.

We will integrate sustainability and decarbonisation into our latest product strategy and continue to boost our business development in eMobility, alternative fuels and sustainability certification, as well as our public affairs activities aimed at promoting a balanced policy framework to incentivise more rapid decarbonisation.

Leadership insights

CRT stands at a pivotal juncture



Martin Vohánka
Chief Executive Officer

“
Transforming 150 years of fossil-fueled growth into a low-carbon economy, in just decades, is a huge challenge. Eurowag is uniquely positioned to help shape the decarbonisation of CRT in Europe.”

As we reflect on 2024, the CRT industry stands at a pivotal juncture, shaped by profound shifts in technology, policy, and global priorities. Against this dynamic backdrop, Eurowag is steadfast in its commitment to sustainability and innovation, positioning us to lead our customers and the industry towards a more resilient and prosperous future.

The urgency to reduce GHG emissions has never been more pronounced, given mounting evidence of global warming and a delicate geopolitical context that threatens collective action. The CRT sector contributes approximately 9% of the EU’s total emissions, underscoring the imperative for decisive action from our industry. To this end, Eurowag has intensified efforts to promote cleaner energy solutions, expanding our alternative fuel offering and becoming the first CRT-focused eMobility Service Provider.

We are concerned that recent policy trends risk undermining market dynamics and overlook the specific needs of the CRT sector. We believe that industry should be empowered to determine the best path to net zero, supported by policies that balance ambition with pragmatism — decarbonisation cannot be a one-size-fits-all journey. We advocate for green fuel corridors and fair pricing for sustainable fuels, which today often cost more than fossil.

The industry continues to grapple with a declining workforce of truck drivers, a trend exacerbated by demographic shifts and evolving job market dynamics. To counter this, Eurowag is investing in technologies that enhance driver safety, wellbeing and job satisfaction. Our digital platform streamlines operations, reduces administrative burdens, and creates a more

attractive working environment for current and prospective drivers and SMEs to enter the sector.

In 2024, we successfully launched our integrated digital platform, a milestone on our journey to revolutionise how CRT companies operate. By digitising processes and enabling seamless data and payment interactions, we will empower our predominantly SME customers — many operating fleets averaging seven vehicles — to achieve unprecedented efficiency and operational simplicity. This platform will not only drive economic benefits but also supports sustainability through route optimisation and improved fuel efficiency.

Recognising that innovation must be matched by enabling regulation, Eurowag has strengthened its public affairs capability. We actively engage with policymakers to advocate for coherent frameworks and incentives that accelerate decarbonisation and digitalisation within the CRT sector, and we caution against scattered subsidies that distort markets and limit systemic progress.

Our dedication to reach our sustainability goals remains steadfast. Internally, we are on track to meet Scope 1 and 2 targets, despite rapid growth. With regulatory and disclosure requirements evolving, we are proactively preparing to meet new standards, ensuring transparency and accountability in all we do.

Learning by doing

This year we have undertaken a rigorous Double Materiality Assessment to ensure we can objectively identify and actively manage our ESG impacts, risks and opportunities going forward. During the process, we focused on specific activities, business relationships, geographies or other factors that may give rise to, or could potentially give rise to, heightened risks of adverse impacts, such as GHG emissions, pollution, corruption, bribery, or human rights issues.

The important next steps are already underway to develop policies, KPIs and action plans to properly manage the impacts, risks and opportunities we found to be material. Our leadership team is taking the insights gained into our strategic decision-making, operational planning and performance evaluation, in our ambition to create long-lasting impact and value from this process.

As we look ahead, the path forward demands courage, adaptability and collective effort. The digital and energy revolutions underway hold both promise and complexity. Eurowag is dedicated to leading the CRT industry through this transformative period, leveraging innovation, sustainability, and collaboration as our guiding principles. Together with our stakeholders, we are building a future where commercial road transport can be clean, fair and efficient.

Industry insights

Charting a balanced pathway to decarbonisation



Matthias Maedge
VP CRT Decarbonisation

The CRT industry continues to play a vital role in Europe's economic prosperity, with Central and Eastern European ("CEE") countries contributing significantly to the sector. Four out of the top five countries in international freight transport are based in the CEE region, encompassing almost 250,000 enterprises. This underlines the region's importance not only for the EU's economy but also for its decarbonisation ambitions.

As part of European climate law, the EU aims to reduce net GHG emissions by at least 55% by 2030. Achieving this requires all sectors of the economy to align with the objectives of the Fit for 55 package, emphasising fairness, cost-effectiveness and respect for market competition.

The CRT sector is at the forefront of these efforts, facing challenges including administrative burdens, inconsistent policy implementation, and disparities in investment across member states.

A balanced policy framework is essential to ensure the sector's ability to innovate and thrive while contributing to the EU's climate goals. However, concerns remain about over-regulation and uncoordinated policy measures that risk economic disruptions and actually hamper decarbonisation. The Clean Industrial Deal leaves too much room for speculation and the European Commission

has yet to prove whether it is capable of rethinking its policy strategy to decarbonise commercial road transport.

We would highlight several areas where immediate action is needed to incentivise more rapid decarbonisation, including:

- › Adopting technology-neutral approaches that focus on CO₂ reduction based on the well-to-wheel ("WTW") principle, rather than blanket bans of the internal combustion engine (which can be operated in a climate-neutral manner with renewable fuels)
- › Reducing administrative burdens by reviewing and harmonising the implementation of EU policies such as RED III and ETS2 across member states, while adjusting the level of ambition in line with evolving innovation opportunities and market realities
- › Reviewing and aligning existing policies to prevent contradictions and inefficiencies that hinder the implementation of scalable and effective decarbonisation solutions
- › Establishing a uniform and cross-border GHG accounting and trading system for renewable energies in transport to prevent isolated development and competitive disruptions between different countries

- › Ringfencing revenues from emissions taxes and road user charges for reinvestment in road transport innovation, decarbonisation and digitisation
- › Accelerating the development of energy infrastructure for e-charging and renewable fuels, and aligning support measures for electrification and other low-carbon technologies
- › Reforming the Energy Taxation Directive and implementing CO₂ taxation

The future competitiveness of the European CRT industry hinges on a cohesive policy framework, fair investment strategies and meaningful collaboration between governments and stakeholders. As the industry navigates these challenges, we welcome the opportunity for dialogue and collaboration to identify actionable solutions. By aligning policies with market realities, the EU can secure a prosperous and sustainable future for its transport sector.



The complexity of decarbonisation laws overwhelms the industry and brings irreparable disadvantage for CRT and related service sectors. All innovation pathways are needed to achieve faster energy transition and to replace fossil fuels with sustainable renewable energies: every green electron and molecule is needed."

Stakeholder engagement

Listening and learning from our stakeholders

We work with a wide range of external stakeholders at EU level, as well as in the countries where we operate. We believe constructive collaboration is key to helping us learn and innovate.

We conducted consultations with employees, customers, suppliers, investors and local communities. These sessions helped us identify and prioritise sustainability issues that may impact or be impacted by our business activities.

Stakeholders who had strong knowledge of actual or possible impacts, risk and opportunities (“IROs”), were included in the process to provide insights on sustainability matters and to identify and evaluate these IROs. This was a key component in the DMA process.

The investor relations team, Chief Financial Officer and Chief Executive Officer lead our engagement with prospective and current investors.

Our sales and marketing teams lead our engagement with customers. We monitor the level and type of customer feedback, so that we can address customer concerns. To better understand and respond to their needs, the teams engage with customers through panels, focus groups and surveys that provide formal, quantitative insight into customer needs and interests. The teams also secure unique insight into the needs of truck drivers through our Driver Survey, which is answered directly by truck drivers.

We engage peers in related and influential industries, such as shippers and freight forwarders, as well as original equipment manufacturers (“OEM”) through our automotive division. We work with industry peers and policy makers through our membership and participation in a number of trade bodies, including the Sustainability Working Group of Fleet Cards Europe, which Eurowag currently chairs. This helps us understand and influence regulatory developments, as well as the impact of current and future policy and regulations at EU and member state level.



Customers

In 2024, we reached out to 300 new contacts willing to be part of our research activities. We led interviews with ~500 non-customers and 500 customers across six strategic markets, and conducted 100 interviews focused on the Eurowag Office concept and user interface.

To inform the development of our Decarbonisation as a Service, we undertook extensive insights research during the year and learned that customers are extremely interested in decarbonisation, alternative energies, renewable fuels and CO₂ certification.



Suppliers

We held regular meetings with our energy vendors and key corporate suppliers in 2024. We worked with experts to develop our sustainable procurement approach and tools to identify potential environmental or social risks and prioritise opportunities for engagement.

Double Materiality Assessment

Rigorous assessment process

During 2024, Eurowag conducted a Double Materiality Assessment in accordance with the requirements of the ESRS.

This assessment involved identifying and objectively evaluating ESG IROs. At the time of writing, the results of the DMA are undergoing final reviews and internal approvals, and have not yet been audited, therefore there may be some small changes to be made to this material. We would nevertheless like to share at this early stage, in recognition of the importance of the work undertaken to date which marks a milestone on the journey towards full ESRS-compliant disclosure in the future.

1 Context mapping

We mapped the business activities and relationships, value chain, external landscape and affected stakeholders to identify relevant sustainability matters, as outlined in ESRS 1. Topics and sub-topics that were not relevant to our business model were omitted from the review.

2 Identification of impacts

We created a long-list of potentially material IROs across all ESG matters and, from the first identification phase, reviewed against the informal ESRS 1 and TCFD checklists. Impacts which did not clearly corresponded to any ESRS topic were listed as "entity-specific".

3 Assessment of our impacts

To determine their significance, we analysed the long-list of Eurowag's actual and potential impacts on people and the environment, based on ESRS disclosures on the prioritisation. The assessment was validated with stakeholders internally and externally where appropriate.

4 Identification of risks and opportunities ("ROs")

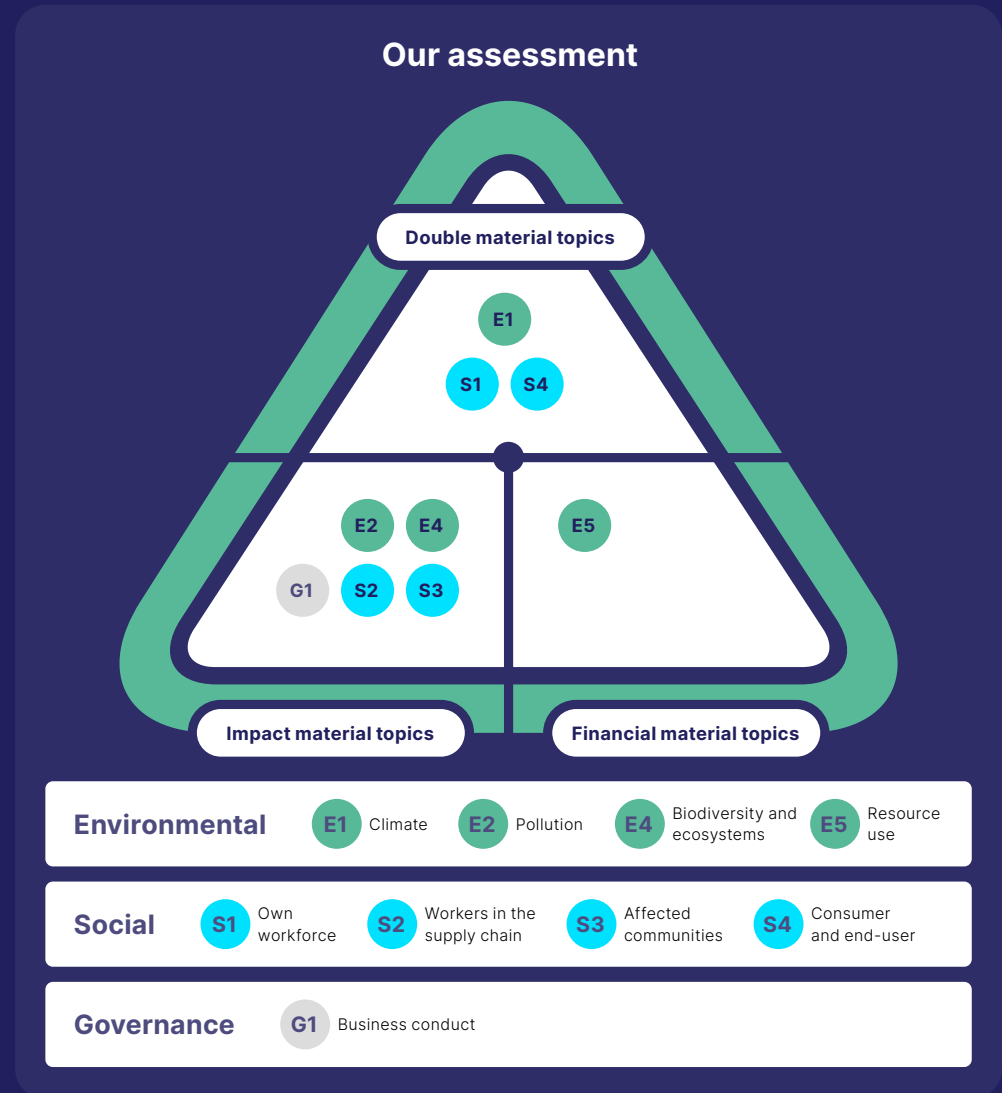
We identified key ROs from a financial perspective in a cross-functional assessment.

5 Financial assessment of risks and opportunities

To determine their materiality, we analysed the risks and opportunities using ESRS criteria and following a quantitative approach wherever possible, assessing them against Eurowag's tailored risk evaluation framework.

6 Prioritisation

We prioritised and determined a narrow list of material IROs based on the result of the assessments. We also identified which specific metrics and information about the prioritised IROs will need to be monitored and collected during 2025.




Double Materiality Assessment continued

Environmental

Key  Double material  Impact material  Financial material

These are the preliminary environmental IROs identified as material, pending future limited assurance of DMA.

E1 Climate 

Climate change mitigation


We have a positive impact by helping customers to reduce emissions and decarbonise through our products and services. We have a negative impact through our Scope 1, 2 and 3 GHG emissions footprint, including our customers' use of the fossil fuels sold directly at our truck parks or through our acceptance network.

Energy

We have a positive impact as we increase the share of renewable energy consumed in our operations and have the opportunity to generate renewable energy on-site at our own truck parks.


Climate action is one of the strategic focus areas of our Sustainability Action Plan and we have policies, metrics, targets and action plans in place.

[Read more on pages 18 to 26](#)

E2 Pollution 

Pollution of air, water, soil, living organisms and food resources

If there were to be a fuel leakage at one of our truck parks, we could potentially have a negative pollution impact. We have three truck parks within 500m of protected areas and one within a protected area, where this risk could be particularly heightened. We actively mitigate this risk to reduce the potential for any negative impact and during 2025 we will be further developing policy, metrics and action plans.

E4 Biodiversity and ecosystems 

Direct impact drivers of biodiversity loss

Biofuels play a key role in decarbonising commercial road transport. HVO and bioLNG have a much lower carbon footprint than fossil fuel, as they are derived from renewable sources, and they offer an important solution to customers today whilst longer-term solutions such as electrification are developed. If not sourced sustainably, biofuels can carry a potentially negative impact from land use change, competition with food production, monoculture farming practices and water use. Eurowag mitigates this risk through our strict International Sustainability and Carbon Certification ("ISCC") certification and only sourcing sustainably certified biofuels.

[Read more on pages 21 to 22 \(alternative fuels\) and 27 \(nature and biodiversity\)](#)

E5 Resource use 

Resource outflows related to products and services

We identified an opportunity for financial and resource savings, if we are able to take back and refurbish more of the on-board units ("OBUs") supplied to our customers. These devices are comprised of various components, which could potentially be reused in line with circular economy principles, focusing on harvesting and reusing materials from returned equipment to reduce virgin material consumption, ensuring environmentally safe disposal of residual materials and compliance with all applicable regulations. This is a new topic for our sustainability strategy and we will be developing our response during 2025.

Double Materiality Assessment continued

Social

Key



Double material



Impact material



Financial material

These are the preliminary social IROs identified as material, pending future limited assurance of DMA.

S1 Own workforce**Working conditions**

We have a positive impact on our employees through the policies and processes we put in place to enable flexible working and promote work-life balance. We can also have a negative impact due to health and safety risks such as injuries, work time lost, or pollution from fuel-related particles.

Equal treatment and opportunities

We can potentially have an impact due to gender pay gap inequality and disparities in pay for equal work, resulting from gaps between male and female employee remuneration. Consequently, the financial cost of closing the gender pay gap presents a financial risk to the business.

Employees can experience impacts connected to violence and harassment at the workplace, for example night watchmen at our truck parks are at risk of attack or harassment.

We could have negative impacts connected to inclusion and representation of minority groups in the workforce, and we can see opportunities in ensuring diversity, including through the inclusion of people with disabilities in the workforce.

Other work-related rights

There could potentially be a negative impact if the data privacy of employees were jeopardised through a data leak or cyber attack. The cost of remedying data privacy-related impacts could present a potential financial risk to the business. Promoting equality, diversity and inclusion, employee engagement and wellbeing, and information security, are three strategic focus areas of our Sustainability Action Plan and we have policies, metrics and action plans in place.

» Read more on pages 39 to 45

S2 Workers in the supply chain**Entity-specific: Wellbeing of drivers**

We have a positive impact on the wellbeing and safety of drivers. Our diverse range of products and services helps by: enabling drivers to share wellbeing and safety-related information (e.g. on safe parking sites or good facilities); monitoring driving hours and ensuring drivers adhere to legal driving hours and rests to reduce the risk of fatigue-related accidents; maintaining high standards of quality and security in our facilities including truck parks; providing health content targeted at drivers through our charity partners. We monitor driver satisfaction with Eurowag's support of their health, safety and wellbeing through a regular survey.

Other work-related rights: child labour or forced labour in the supply chain

Currently we have no evidence of child labour, forced labour or modern slavery in our supply chain or operations. The majority of our supply chain is within Europe, with only a handful of tier 1 suppliers for electronics and hardware components from China. Eurowag has developed a sustainable procurement toolkit and we publish an annual Modern Slavery Statement.

» Read more on pages 32 to 33 (drivers) and 44 to 46 (supply chain)

S3 Affected communities**Entity-specific: Noise and/or light pollution from truck park operations**

We could potentially have a negative impact on affected communities due to noise and/or light pollution from our truck park operations (we have four truck parks within 100m of residential areas). No incidents or complaints have been reported, and we will implement operational guidelines to ensure the local communities are not negatively affected by the commercial road traffic connected to our operations.

» Read more on page 37

S4 Consumer and end-user**Information-related impacts**

There could potentially be a negative impact if the data privacy of customers were jeopardised through a data leak or cyber attack. The cost of remedying data privacy-related impacts could present a potential financial risk to the business.


» Read more on page 45

Double Materiality Assessment continued

Governance

Key  Double material  Impact material  Financial material 

These are the preliminary governance IROs identified as material, pending future limited assurance of DMA.

G1 Business conduct 

Whistleblower protection
 The negative impacts connected to the protection of whistleblowers, providing whistleblower reporting channels, and ensuring against retaliation cases against whistleblowers, are high priority within Eurowag’s compliance policy and implementation programme.

Management of relationships with suppliers including payment practices
 Late payment causes negative impacts on the cash flow and economic stability of our suppliers, particularly affecting SME companies.

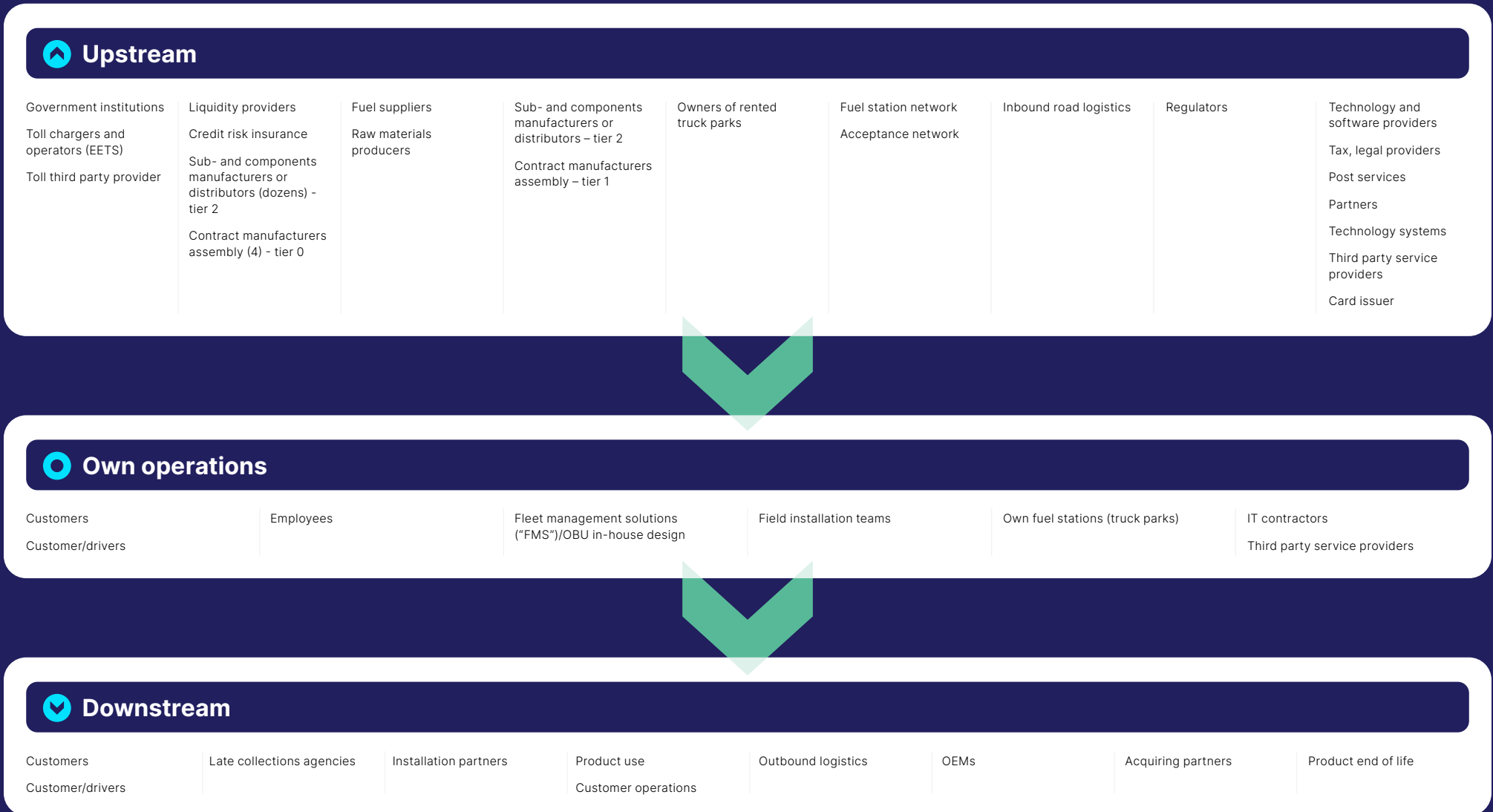
Responsible business conduct is a strategic focus areas of our Sustainability Action Plan and we have policies, targets and action plans in place.

[Read more on pages 44 to 45](#)



Value chain

Our value chain



Sustainability strategy

Our Sustainability Action Plan

To achieve Eurowag’s strategic priorities to be in every truck, drive customer centricity, grow core services and expand platform capability, we have four enablers, one of which is embedding sustainability into our business.

We do this through our Sustainability Action Plan, which contains four focus areas based on the original materiality assessment which was carried out in 2021: climate action, customer success and wellbeing, community impact and responsible business. We have set objectives and targets for each focus area, which you can find out more about in the following pages.

In 2025, we will be reviewing our sustainability strategy, on the back of our recent Double Materiality Assessment, to ensure it encompasses all our material ESG impacts, risks and opportunities. In this report we begin to layer the material IROs onto our strategic focus areas, and during 2025 we will develop policies, metrics and action plans to cover all relevant topics.

Climate action

- › Accelerate the energy transition
- › Reduce our customers’ GHG emissions
- › Reduce our GHG emissions
- › Nature and biodiversity

» Read more on pages 17 to 27

Customer success and wellbeing

- › Help SMEs to thrive
- › Improve wellbeing and safety for truck drivers

» Read more on pages 28 to 33

Responsible business

- › Promote diversity and inclusion
- › Workplace engagement and wellbeing
- › Responsible business conduct
- › Human rights and modern slavery

» Read more on pages 38 to 46

Community impact

- › Make a positive impact in our local communities

» Read more on pages 34 to 37





Climate action

Supporting our environment

Contents

- 18 Why it matters to Eurowag
- 20 Eurowag's roadmap to net zero
- 21 Accelerating the energy transition
- 23 Reducing our customers' emissions
- 25 Reducing our direct emissions
- 27 Nature and biodiversity



Reducing emissions from our operations and supporting our customers to reduce emissions are key goals for our facility, energy and decarbonisation teams."

Attila Dsupin
Managing Director of BU Energy

Links to SDGs



Goals

50%

reduction in GHG emissions from our own operations by 2030 (Scope 1 and 2)

80,000

active alternatively fuelled trucks using Eurowag products and services by 2030

20%


reduction in customers' emissions intensity by 2035 (gCO₂e/tkm)

Reduce carbon intensity of delivered energy (gCO₂/MJ) by 15% by 2030 (well to wheel)

Net zero direct GHG emissions by 2040

No fossil fuel products in Eurowag portfolio and net zero business by 2050



 Climate action





Why it matters to Eurowag

Impacts, risks and opportunities




These are the preliminary IROs identified as material, pending limited assurance of our DMA.

ESRS Category	ESRS Sub-topic	Eurowag IRO	Actual / potential	Impact/Risk/ Opportunity	Value chain	Timeframe
E1 Climate change	Climate change mitigation	Helping customers to decarbonise	Actual	+	Downstream	S M L
		Company GHG emissions	Actual	-	Upstream, Own Operations, Downstream	S M L
		Fossil energy product use	Actual	-	Downstream	S M L
E1 Climate change - transition risks	Market changes	Decline in revenue from fossil fuel due to legislation/market changes	Potential	!	Upstream	S M L
		Client default risk due to cost of significant changes in the market and legislative/market push for decarbonisation	Potential	!	Downstream	S M L
		Economic recessions due to climate and societal crisis, impacting our revenues	Potential	!	Downstream	S M L
		Helping customers to decarbonise as a new/growing revenue stream	Actual	💡	Own Operations	S M L
	Reputation	Loss of brand value - challenges with talent retention and attraction	Potential	!	Own Operations	S M L
E1 Energy	Energy consumption and mix	Renewable energy at our assets	Actual	+	Own Operations	S M L
E2 Pollution	Pollution of air, water, soil, living organisms and food resources	Pollution due to fuel leakage on site	Potential	-	Own Operations	S M L
E4 Biodiversity & Ecosystems	Direct impact drivers of biodiversity loss	Biofuels and their impact on direct or indirect land use change	Potential	-	Upstream	S M L
E5 Circular economy	Resource outflows related to products and services	Circular economy – savings if on-board units were refurbished	Actual	💡	Own Operations	S M L

Impact/Risk/Opportunity


 Positive impact
  Negative impact
  Risk
  Opportunity

Value chain

 Upstream
  Own Operations
  Downstream

Timeframe

 Short
  Medium
  Long

 Climate action





Why it matters to Eurowag continued

Ambition

Eurowag is dedicated to driving the decarbonisation of the CRT industry and achieving net zero emissions by 2050. Through investments in alternative fuels, electrification and digital solutions, we empower customers — especially SMEs — to enhance efficiency, reduce emissions and transition to a more sustainable, lower-carbon future.

We are also expanding our focus to address material topics connected to biodiversity and nature, which are in turn deeply connected to climate and long-term sustainability outcomes.

Targets and performance

Ambition	Baseline	2024 progress	Target	Year
Reduce GHG emissions from our operations	2023	 17%	50%	2030
Increase active alternatively fuelled trucks using Eurowag products and services	n/a	 1,537	80,000	2030
Reduce carbon intensity of delivered energy	2019	 1%	15%	2030
Reduce customer emissions intensity	2023-24	 0.8%	20%	2035





Climate action

Eurowag's roadmap to net zero

Eurowag is committed to playing a role in enabling the CRT industry to decarbonise while continuing to provide transport services for the people, communities and economies that depend on them. First and foremost, this means helping customers make efficiencies and make the transition from fossil fuels to alternative energy solutions, as well as reducing our own direct emissions. Our ultimate goal is to be part of the global movement to limit global warming to 1.5°C.

We have set a combination of short-term and long-term decarbonisation targets, both for our own operations and our value chain, to ensure that we reach net zero by 2050 at the latest. These targets were built on our best expectations of how the industry would evolve, based on input from stakeholders and industry insights. We continue to monitor market developments to identify how and when we may need to adapt our strategy and key performance indicators, and as part of that continuous process we reviewed our net zero roadmap during 2024.

As a result of our review, we updated the baselines for our targets to reduce our direct emissions and our customers' emissions intensity, to reflect the changes in organisational and data scope resulting from acquisitions made since our sustainability strategy was initially developed. Our objective was to maintain the level of ambition, whilst ensuring the most accurate and complete baseline dataset for meaningful progress monitoring going forward. We have also extended the timeframe of our target to reduce customer emissions intensity by 20%,

in recognition of the impact of external factors as set out in last year's Sustainability Report, whereby our roadmap review revealed that the speed of progress towards improved customer emissions intensity is moving more slowly than we had initially expected. We will continue to monitor our net zero roadmap and will be developing our transition plan during 2025–26.

Achieving our business goals sets us on a path of rapid growth, which will have an impact on our Scope 3 emissions, one that is essential for us to take into account as we continue to build out our net zero roadmap and transition plan. We estimate that achieving this rapid growth will result in our absolute Scope 3 emissions peaking after 2030. In the period up to 2030, we are focusing on enabling greater efficiency for customers, whilst developing new business models through Decarbonisation as a Service that promote rapid uptake of alternative energies and cleaner technology, working hand in hand with vehicle manufacturers and customers.

The transition to a low-carbon economy is fast paced, with a continuous stream of new technologies and opportunities being released. We need to stay agile, collaborate, and engage with our key stakeholders to ensure that we contribute positively to this transition – as in the end, we will only be able to fulfil our own net zero ambitions if all the various parts of this complex industry and wider ecosystem continue to move collectively towards our shared goal of combating climate change.





Accelerating the energy transition

With our deep understanding of the CRT industry, we are creating the technology and incentives to help customers make the transition to a lower-carbon future. We want to accelerate the energy transition and help customers to easily switch from diesel to non-fossil fuel energies and vehicles by driving innovation, new products and services, through meaningful partnerships in our sectors.

Material topics and priorities

- > E1 Climate change: Helping customers to decarbonise
- > E1 Climate change: Fossil energy product use
- > Enable access to alternative fuels and clean mobility, introducing a wider alternative offering to customers, e.g. bioLNG, electricity and HVO
- > Collaborate and advocate for clean mobility infrastructure and a fair deal for SMEs
- > Develop new advisory tools and services to support customers' energy transition
- > Create incentive packages and affordable financing solutions

Targets and progress

No longer offer fossil fuel energy products by 2050

80,000 active alternatively fuelled trucks using Eurowag products and services by 2030

Active alternatively fuelled commercial vehicles

1,537 ▲ +97%*

2024 **1,537**

2023 780

2022 353

* Percentage change 2023–2024

Our ultimate goal is to achieve above-market penetration of alternatively fuelled commercial vehicles and our target is based on modelled pathways of decarbonisation in CRT, so our pace of progress will be partly dependent on the penetration of alternative vehicles in the market.

IRO management and achievements

We recognise that the full variety of alternative fuels or power sources which have the potential to contribute to CRT decarbonisation are going to be needed to achieve the transformation in our sector, including renewable fuels (bioLNG and HVO), alternative fuels (electricity) and transitional fossil fuels (LNG, CNG, LPG).

In 2024, we saw customer take-up of renewable fuels growing considerably, driven by the local regulatory and pricing markets.

Active alternatively fuelled trucks in our portfolio*	2022	2023	2024
HVO and Biodiesel 100	24	39	524
LNG	254	552	566
Electric	62	132	198
LPG, CNG, bioCNG	13	57	249
Total	353	780	1,537

* Alternatively fuelled trucks and light commercial vehicles with active Eurowag service(s) in December 2024.

From LNG to bioLNG

Biomethane is making strong inroads in heavy-duty transportation, now available at ~20% of the LNG refuelling stations in Eurowag's network and constantly growing. Switching to biomethane can significantly reduce operational costs by over 30% compared to diesel and can achieve up to 100% CO₂e emissions reduction (or even generate negative emissions, depending on the feedstock used, e.g. manure).

We launched 100% renewable bioLNG at our two LNG refuelling points at Eurowag truck parks Kozomín and Modletice in the Czech Republic, and we added more than 100 additional LNG acceptance points, bringing our total LNG acceptance network to ~500 stations.

In 2024, our customers increased the refuelled volumes of LNG by more than 55% compared to 2023, and with the Eurowag fuel card, our customers have access to 60% of the European LNG network.

Expanding HVO

In 2024 we expanded HVO from one to six of our own truck parks. We also continued developing our acceptance network for HVO by almost tripling the number of acceptance points by more than 270 to a total of ~450 across 12 countries. In 2024, our customers increased the refuelled volume of HVO by more than 63-fold, compared to 2023, highlighting the fast-growing customer demand for sustainable certified lower-carbon alternatives to diesel.

Climate action

Accelerating the energy transition continued

IRO management and achievements continued

Fuel sustainability certification

In October, we achieved ISCC as a trader with storage for HVO, bioLNG and bioLPG, confirming our compliance with the globally recognised sustainability and GHG emissions standards. This certification highlights our commitment to offering transparent and credible product credentials to our customers, building awareness and trust in order to accelerate the energy transition.

Decarbonisation as a Service

We developed a value proposition for Decarbonisation as a Service, including customer advisory, fleet renewal, green fuel corridors and accessibility to an alternative fuel network, and the measurement and reporting of CO₂ emissions for customers. This is a growing area of commercial focus for us, as more customers seek a trusted partner to help them to navigate the upcoming transformation of the industry and meet the evolving demands of their partners.

Advancing eMobility for commercial road transport

In 2024, Eurowag became the first eMSP fully dedicated to the CRT segment, offering access to all major charge point operators (“CPOs”) across Europe. Designed specifically for the needs of light commercial and heavy-duty vehicles, our solution is built on Last Mile Solutions’ technology, covering more than 80% of publicly accessible charging locations.

Eurowag thereby gives access to 700,000+ light commercial vehicle public charging points in 22 European countries and offers a secure post-payment solution with Eurowag’s fleet card (RFID).

We continue to strengthen our position through strategic partnerships, such as our collaboration with Milence (a joint venture of Daimler, Traton and Volvo), ensuring Eurowag customers benefit from access and attractive conditions at one of Europe’s fastest-growing charging networks for heavy-duty vehicles. Additionally, we established a co-operation agreement with Leap24, guaranteeing Eurowag eMSP users exclusive discounts and the most competitive charging rates at Leap24’s locations.

Beyond public charging, we launched a comprehensive Charging-as-a-Service (“CaaS”) solution, supporting customers throughout their electrification journey, from advisory services and infrastructure installation to commissioning and management. Furthermore, we offer customers better utilisation and higher profitability of their charging infrastructure by making it semi-publicly accessible.

Fuelio for EVs

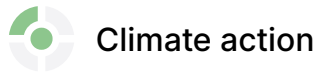
We would like to develop support for electric vehicles (“EVs”) in the Fuelio app and increase the userbase of EVs, with the ultimate aim of developing an “EV mode” in the app. In 2024, we added some features to enter and configure EVs so they can track their fuel usage, and we have already started getting feedback from users.

Next steps

In 2025, we will:

- › Continue to expand access to bioLNG and HVO on our own truck parks and through our acceptance network, to create “green fuel corridors” along key routes.
- › Expand our eMobility services with features such as slot booking at key charging locations, dedicated filtering for heavy-duty chargers, point of interest (“POI”) integration and predictive navigation, fully integrated with Eurowag’s fleet management and end-to-end digital platform Eurowag Office.
- › Undertake extensive customer insights engagement to tailor our Decarbonisation as a Service value proposition, as we build up our advisory capacities.
- › Add e-charging locations to our “Fuel API” database of fuel stations in the Fuelio app.
- › Engage with policy makers at national and European levels to continue to advocate for a solution-agnostic approach to CRT decarbonisation.





Reducing our customers' emissions

At Eurowag, we believe that we can contribute by helping our customers indirectly to reduce their emissions intensity, by offering solutions to increase the efficiency of driving and journeys, and to analyse and report emissions.

Material topics and priorities

- › E1 climate change: Helping customers to decarbonise
- › Supporting more efficient driving by monitoring and promoting eco-driving behaviour through analysis, advice and incentives – to save fuel and reduce emissions
- › Improving efficient logistics and reducing empty journeys with planning tools
- › Delivering smart navigation products and route optimisation services to minimise fuel consumption
- › Carbon reporting per customer journey and refuelling
- › Energy transition and alternative fuels – as represented by the first focus area of our climate action strategy

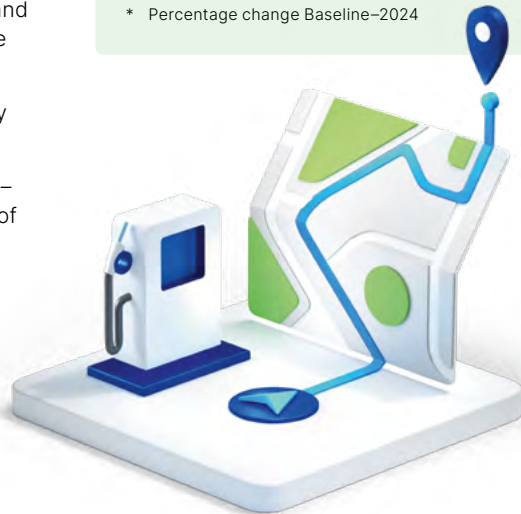
Targets and progress

20% carbon intensity reduction per tkm by 2035
(gCO₂e/tkm)
(baseline year July 2023 - June 2024)

Customers' GHG emissions intensity
(gCO₂e/tkm)



* Percentage change Baseline-2024



External circumstances including the macroeconomic situation, policy framework and technology developments have a strong bearing on the customer's eventual carbon intensity per tonne-kilometre. As we forecast in last year's report, customers' carbon intensity has remained steady in 2024.

We have updated both the baseline year and target year for this KPI. The baseline was updated to July 2023 - June 2024 due to a significant increase in data scope, which also necessitated an update of methodology, when data from acquired companies WebEye and Inelo became available for the first time. The target year has been extended to 2035 in recognition of the slower realistic progress we can expect customers to make by 2030, due to the multifactorial influences which affect customer emissions intensity.

Meanwhile, we maintain our focus on supporting our customers to save fuel, reduce cost and reduce emissions through using our efficiency products and services.

	Baseline	2024
Customers' carbon intensity (gCO ₂ e/tkm)	80.3	79.5
Average weight of load (tonnes)	11,738	11,840
Average monthly mileage per vehicle (km)	7,714	7,688

IRO management and achievements

Improving driving behaviour

Our driving behaviour tools and telematics data enable our customers to become safer and more efficient drivers, saving an average of 4-6% on fuel consumption. These products focus on giving customers and drivers feedback, insights and tips to improve fuel efficiency and reduce vehicle wear and tear.

As shown below, customers with our Perfect Drive product have a lower carbon intensity than those without, and those with a high score are significantly more carbon efficient.

In 2024, the Group's products that target driver behaviour were used in 112,688 vehicles, up 4% on 2023.

During the year, we introduced new functionalities, including driver recommendations based on drive mode (highway versus city), improved braking evaluation on new vehicle models, more nuanced idling evaluation and a detailed report of operating variables.

2024	Customers' carbon intensity (gCO ₂ e/tkm)
All drivers	86
Without driver behaviour product	89
With Perfect Drive product	79
With Perfect Drive score >80	69

Climate action

Reducing our customers' emissions continued

IRO management and achievements continued

Improving driving behaviour continued

We created a new Coach Report for dispatchers, offering comparative performance evaluation and tips for individual drivers, and we ran a communications campaign to build awareness of the benefits of Driver Behaviour Coach, including blogs, social media posts, webinars and an e-book, presenting practical demonstrations of how to use the product effectively for maximum savings and benefit.

CO₂ emissions tools for our customers

We continued to develop our tools to help our customers understand their emissions per vehicle and journey. In 2024, we added cargo weight to the trip log, which is a pre-requisite to CO₂e/tkm, as well as enabling the customer to be able to select fuel type per vehicle to enable more accurate calculations based on selected fuel type.

Route planning

In developing our low-emission route calculation, we are led by the prioritisation of key customer partners to first polish a basic functionality for EV trucks. Low-emission route calculation depends on a highly precise estimate of battery consumption, taking account of factors including vehicle weight, road elevation and temperatures. In 2024 we added support for weight as a user input for route calculation and after adding the elevation parameter we will proceed with the development of the route emission calculator and the generation of low-emissions route alternatives.

Transport management

In 2024 we began to build the transport management system ("TMS") in Eurowag Office, so customers can manage transport orders and issue invoices. As we add continue to add functionality, customers will be able to improve operational efficiency, reduce environmental impact and achieve cost savings.

Reducing empty mileage

Within FireTMS, we piloted a freight exchange platform in 2024. We worked with an agile proof of concept to test customer interest and evaluate what would be needed to enable freight forwarders, shippers and carriers to effectively connect, list loads and find transport orders. The learning we gained through the pilot enabled us to take the next step towards enabling customers to comprehensively manage transport and forwarding, with the end goal of reducing empty mileage on the road.

Next steps

In 2025, we will continue to focus on improving customer emissions reduction-related services and products such as:

- ▶ Driver Behaviour Coach campaign to raise awareness and boost uptake, including a Driver of the Year competition to celebrate the driver and company with the highest driver behaviour scores, upgrade promotions and free trial periods.
- ▶ Investigating more frequent rewards for drivers with the highest driver behaviour scores, to incentivise active usage.
- ▶ Evaluating our TMS product development, gathering feedback to refine it based on user experience.
- ▶ Adding new evaluation parameters to Perfect Drive, including acceleration and braking intensity, and developing more detailed maps and histograms in Driver Behaviour Coach to upgrade the driver report.
- ▶ Implementing the CO₂ estimation for a planned route and low-emission route alternatives, as well as CO₂ emissions calculations based on fuel card transactions and fuel type used.
- ▶ Preparing the first fully integrated transport management flow including planning, execution and cost calculation.
- ▶ Launching the fireXgo freight exchange, fully integrated into the FireTMS system.





Reducing our direct emissions

The Group operates in 23 countries and in the last five years, the Company has more than doubled in the number of employees and revenues. Despite the growth, we remain committed to reach net zero emissions from direct operations by 2040, with a milestone of at least 50% reduction in Scope 1 and 2 by 2030.

Material topics and priorities

- › E1 Climate change: Reducing our company GHG emissions Scopes 1, 2 and 3
- › Switching to renewable electricity for our operations
- › Switching our car fleet to low and zero emissions vehicles and fuels, including biofuel insetting
- › Investing in on-site renewable energy generation technologies across our operating assets
- › Optimising office spaces through post-merger integration processes and identifying opportunities for energy management efficiencies
- › Exploring community energetics

Targets and progress

Net zero direct GHG emissions by 2040

(Scope 1 and 2 market based)

50% reduction in Scope 1 and 2 emissions (tCO₂e) from our own operations by 2030

(market based, baseline year 2023*)

GHG emissions from Group operations, Scope 1 and 2 market based (tCO₂e)

3,632 ↓ 17%*



* The baseline has been updated to 2023 to take account of the significant increase, due to the acquisition of Inelo and its subsidiaries, and the ambition to reduce our emissions by 50% by 2030 remains.

Scope 1 and 2 and intensity metrics	2022	2023	2024
Total energy consumption (kWh)	9,642,031	14,608,725	14,185,514
Scope 1 emissions (tCO ₂ e) – market based	1,652	2,655	2,304
Scope 1 emissions (tCO ₂ e) – location based	1,652	2,655	2,552
Scope 2 emissions (tCO ₂ e) – market based	1,787	1,698	1,328
Scope 2 emissions (tCO ₂ e) – location based	1,637	2,038	1,755
Scope 1+2 GHG emissions (tCO ₂ e) – market based with insetting	3,439	4,353	3,632
Total Scope 1 and 2 GHG emissions (tCO ₂ e) – market based	3,439	4,353	3,880
Total Scope 1 and 2 GHG emissions (tCO ₂ e) – location based	3,289	4,693	4,308
GHG intensity: truck parks (tCO ₂ e/refuelling point) – market based	7	6	5
GHG intensity: offices (tCO ₂ e/thousand sqm) – market based	54	56	55
GHG intensity: truck parks (tCO ₂ e/refuelling point) – location based	6	5	5
GHG intensity: offices (tCO ₂ e/thousand sqm) – location based	53	70	70

Scope 3 emissions (tonnes CO ₂ e)	2022	2023	2024
Purchased goods and services	1,117,318	1,321,594	1,458,815
Capital goods	434	882	234
Fuel and energy-related activities	745	1,152	1,096
Upstream transportation	1,834	1,746	2,335
Waste generated in operations	57	63	63
Business travel	787	1,227	1,683
Employee commuting	772	666	703
Downstream transportation	114	188	226
Use of sold products	4,257,591	3,797,008	4,301,478
Total Scope 3 emissions	5,379,652	5,124,526	5,766,632

Operations in the UK	2022	2023	2024
Total energy consumption (kWh)	476	8,392	8,392
Scope 1 emissions (tCO ₂ e)	0	6	6
Scope 2 emissions (tCO ₂ e) – market based	0.17	3	3
Scope 2 emissions (tCO ₂ e) – location based	0.11	2	2
Total Scope 1 and 2 GHG emissions (tCO ₂ e) – market based	0.17	9	9
Total Scope 1 and 2 GHG emissions (tCO ₂ e) – location based	0.11	8	8



Reducing our direct emissions continued

IRO management and achievements

Switching to and retaining renewable electricity

In 2024, we expanded the total capacity for solar generation at our assets by another two sites in Hungary (85 kWp combined peak) with four more in Czechia in the pipeline (Ústí nad Labem, Rozvadov, Cheb, Kozomín). Additionally, we enjoyed a full-year benefit of the solar panels installed in Poland in late 2023, bringing in over 90 MWh of clean energy in 2024, saving over 75 tCO₂e.

Innovative insetting approach for our fleet

In 2024, we implemented an innovative HVO insetting project, designed to reduce emissions from our corporate fleet. Through a “biofuel swap”, we procured a dedicated volume of HVO with verified sustainability parameters, enabling us to indirectly reduce a portion of our fleet’s carbon footprint.

To account for this HVO insetting within our carbon footprint reporting, we recognise the need for an adaptation of the current Greenhouse Gas Protocol Corporate Standard, which has remained largely unchanged for over two decades. In 2024, the GHG Protocol initiated work on updated guidance for Scope 1 emissions accounting, expected to reflect the existing framework for distinguishing between location-based and market-based Scope 2 emissions. Therefore we apply a similar methodology to Scope 1 emissions, to reflect the emissions reduction from the

biofuel insetting, in the same way as the treatment of Green Gas Certificates in Scope 2.

This approach for structuring market-based Scope 1 accounting is inspired by the CO₂ Performance Ladder’s guidance on Green Gas Certificates (“GGCs”). Under this framework, companies purchase GGCs representing the environmental attributes of biogas blended into the natural gas grid. The emissions reduction factor of biogas can then be applied to a company’s Scope 2 gas consumption, provided the GGCs are certified under a regulated Guarantee of Origin (“GO”) scheme. A similar mechanism can be applied to HVO insetting in transport; however, because no regulated GO scheme currently exists for HVO, verification by an independent third party is necessary to ensure credibility and prevent double counting.

Our partner provides an externally audited assurance report on the biofuel insetting process, enabling us to incorporate the biofuel swap into our Scope 1 accounting with confidence. While this approach is not yet explicitly recognised under the existing GHG Protocol Corporate Standard, we are confident that the sustainability criteria of the fuel, coupled with robust control mechanisms, ensure full transparency and integrity in our reporting.

Business technology

We made strides in energy efficiency through upgrades to our IT infrastructure. At Eurowag, server and storage system renewals reduced power consumption by 52% and 82%, respectively, cutting data centre energy use by over 10,960 watts and lowering the carbon footprint. Sygic transitioned to modern DELL hardware, replacing decade-old systems with energy-efficient servers (30-50%) and SSD-based disk arrays (50-70%). These upgrades not only reduce energy consumption and emissions but also extend hardware lifespans, minimise waste generation, and enable IT consolidation for greater operational efficiency.

Energy reductions

We are continuously optimising office space wherever possible to reduce operational energy consumption, especially in connection with integrating acquired companies. In 2024, we closed or merged eight offices across our operations. Furthermore, we are modernising technologies across our asset portfolio, such as upgrading to low-emission lighting in our Czech headquarters.

Rethinking fuel deliveries

We financed the leasing of two LNG trucks, which are now used by BenzinTransit to deliver fuel to our stations in Czech Republic, and 170 fuel deliveries to our Llers/Figueres truck park in Spain were made by LNG truck in 2024.

Next steps

In 2025 we plan to:

- Boost our Group asset management resources to monitor and improve our energy management, including installing smart meters at priority assets.
- Expand further on-site renewable energy generation capacities. We are exploring the possibility of installing solar panels in the Czech Republic and making use of the newly proposed community energetics initiative by the Czech government, which would allow us to share any excess generation to effectively reduce the total volume of energy consumed by our most energy-intensive assets.
- Update our Fleet Directive and launch a new Car Allowance Framework, aimed at reducing the total pool of fleet cars controlled by the Group by more than 70 cars over the next three years. Within the fleet we will stop paying for private mileage, continue to impose a maximum emissions standard of 130g/km for new cars, and purchase the first zero emission electric vehicles.
- Explore opportunities for Scope 3 emissions reduction, for example through decarbonising our supply chain, as the next phase of the sustainable procurement project which we kicked off in 2024, increasing the proportion of alternative fuel used for the fuel deliveries to our truck parks, or reducing the carbon footprint of our on-board unit.



Nature and biodiversity

We recognise the increasing significance of nature and biodiversity as a critical area of concern that demands attention from businesses.

Material topics and priorities

- › E2 Mitigating risk of water or soil pollution at our truck parks
- › E4 Managing potential impacts connected to biofuels and their impact on direct or indirect land use change
- › Assessing our physical assets for opportunities to mitigate risks connected to nature and biodiversity, and to identify opportunities to protect and enhance.

IRO management and achievements

In 2024, Eurowag intensified its focus on nature and biodiversity by prioritising capacity building within the organisation and adopting the LEAP (Locate, Evaluate, Assess, and Prepare) approach, developed by the Taskforce on Nature-related Financial Disclosures (“TNFD”). This approach allowed us to successfully identify, evaluate and analyse potential biodiversity-sensitive sites across our operational footprint and value chain, particularly within Eurowag’s energy solutions.

As part of our broader commitment to developing our approach towards nature, we joined the UN Global Compact UK’s Nature Working Group in 2024, to ensure that our approach is informed by global best practices.

By combining internal capacity building with external collaboration, we have been able to enhance our understanding of nature-related risks and opportunities.

Our actions included an enhanced mapping exercise to assess the proximity of key Eurowag assets to protected areas, such as Natura 2000 sites, the Red List of Threatened Species, and World Heritage Sites. These findings were integrated into our Double Materiality Assessment process, where pollution and biodiversity emerged as material topics, reaffirming their strategic importance to our business and stakeholders. During 2025, we will develop policies and metrics as part of our action planning to manage these potential impacts.

Through this mapping exercise, three locations emerged as key areas of focus, due to their potential biodiversity risks: Eurowag’s truck parks at Arraia, Rozvadov I and Kudowa-Zdroj. Office locations near biodiversity-sensitive areas were excluded, as their potential operational impact on local biodiversity was assessed to be negligible.

Two of the identified assets — Arraia and Rozvadov I — are located in proximity to water-protected areas, posing a greater risk of potential environmental impact, particularly in terms of water contamination, habitat degradation and the disturbance of sensitive ecosystems. Now recognising this, we are enhancing our environmental risk management practices in these locations.

Site	Country	Protected area	Type	Distance from protected area	Potential impact	# of protected habitats	# of protected species
Arraia	Spain	Arakil ibaia	Special Areas of Conservation (Habitats Directive)	60m	Fuel leaks, disruptions to the ecosystem (noise and light pollution)	1	14
Rozvadov I	Czech Republic	Kateřinský a Nivní potok	Special Areas of Conservation (Habitats Directive)	420m	Fuel leaks, disruptions to the ecosystem (noise and light pollution)	1	1
Kudowa-Zdroj	Poland	Gory Stolowe	Special Protection Area (Birds directive)	Truck park within area	Fuel leaks, disruptions to the ecosystem (noise and light pollution)	0	6

Next steps

Building on the insights gained in 2024, we will identify what actions could be undertaken to mitigate the risk of negative impact to nature or biodiversity, focusing on the three locations closest to biodiversity-sensitive areas. For example, reviewing our spill prevention and response measures, developing a biodiversity action plan or engaging with local conservation organisations to ensure that our protection efforts align with local ecosystem needs.



Customer success and wellbeing

Putting our customers and truck drivers first

Contents

- 29 Why it matters to Eurowag
- 30 Helping SMEs to thrive
- 32 Improving wellbeing and safety for truck drivers



Following the successful launch of Eurowag Office in 2024, we now aim to continuously improve customer experience, through a phased migration, as we build more and more products and services onto the digital platform."

Ivan Jakubek,
Chief Product Officer


Links to SDGs



Goals

Improve customer survey results on wellbeing and safety and customer success



 Customer success and wellbeing

Why it matters to Eurowag

Ambition


Eurowag aims to empower SMEs in the CRT sector by simplifying and digitising their operations. Through our integrated digital platform, we can streamline fleet management, payments and compliance, reducing administrative burdens and improving efficiency. By leveraging data-driven insights, we can help businesses optimise routes, lower costs and avoid carbon emissions.

With financial solutions and expanding access to alternative fuels, Eurowag focuses on enabling SMEs to thrive in a competitive and fast-evolving industry, supporting their long-term success and wellbeing.





And given how crucial truck drivers are for the resilience of the CRT industry, we have a particular focus on supporting their safety and wellbeing.

Impacts, risks and opportunities




This is the preliminary IRO identified as material, pending limited assurance of our DMA:

ESRS Category	ESRS Sub-topic	Eurowag IRO	Actual / potential	Impact/Risk/ Opportunity	Value chain	Timeframe
S2 Workers in the value chain	Entity-specific	Improve wellbeing of drivers	Actual	+		S M L

Impact/Risk/Opportunity

-  Positive impact
-  Negative impact
-  Risk
-  Opportunity

Value chain

-  Upstream
-  Own Operations
-  Downstream


Timeframe

- S** Short
- M** Medium
- L** Long

Targets and performance

Ambition	Baseline	2024 progress	Target
Improve customer survey results on business success (NPS score)	2023: 69%	 68%	YoY improvement



 Customer success and wellbeing

Helping SMEs to thrive

Our customers are predominantly small and medium-sized transport businesses, many of which struggle to compete due to their size and limited access to financing.

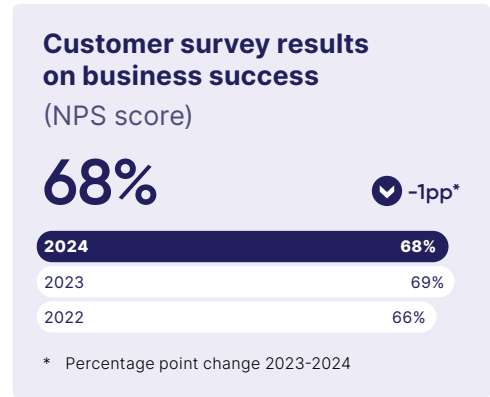
By offering relevant, convenient benefits and services at attractive terms, we are helping them compete, succeed and transition to a low-carbon digital future. Our integrated platform will allow carriers to use one integrated application for most of their business activities. This will reduce inefficiencies and drive improvements in revenues and cash flows, helping our customers to thrive.

Material topics and priorities

- > Becoming the ultimate on-road digital mobility platform, boosting efficiency and creating better business opportunities across the industry
- > Providing affordable financial services to support customers' energy transition
- > Offering anti-fraud systems to reduce fuel theft
- > Connecting trucking companies with merchants, shippers and regulators, and providing vital information to help grow their businesses

Progress

Four years ago, we began surveying our customers to create a baseline understanding of their views and attitudes. In that first customer survey in Q4 2021, 65% of respondents felt we were supporting their success. In 2024, 68% of those surveyed felt we were supporting their success, almost the same as the previous year. We aim to increase this percentage every year.



IRO management and achievements

Eurowag Office for our customers

In 2024, we launched our digital platform designed to help SME transport companies optimise their business operations in one place. Dispatchers will be able to maximise truck utilisation and plan efficient transport routes, whilst drivers can ensure on-time transport and monitor vehicle maintenance and driving styles for improved efficiency, which translates into improved fuel efficiency and reduced carbon emissions intensity.

Cold chain monitoring

We continued to develop our telematics functionality to support hauliers transporting thermosensitive goods such as medicines, foodstuffs and cosmetics. In 2024, we integrated our telematics FMS with inbuilt refrigerator units or installed additional sensors in the trucks to continuously monitor and record the temperature throughout the vehicle's trip. Automated alerts can be set to monitor if the temperature goes outside the predefined range, so fleet managers and drivers can be notified in real time and take corrective actions. These enhancements can help reduce spoilage and waste by ensuring optimal temperature control during transport.

Financial services

In 2024, we developed a new analytical credit model, giving us a much more precise understanding of customer risk profile, which in the future will enable us to provide customers – including SMEs previously disadvantaged by their size and risk profile – with better access to finance. We are developing an Automated Credit Assessment System (“ACAS”) cloud framework to calculate risk in real time, with automated calculation of a pre-approved limit.

Fuelio new features

The Fuelio app helps customers manage their fuel consumption and expenses, as well as driving habits. In 2024, we doubled the number of premium users (subscription model) to almost 4,700 and the number of total unique users grew from 1.3 to 1.6 million. Fuelio was publicly recognised as one of the best fuel logging apps in the market by Time magazine. Weather information was added as a premium feature, which will show customers weather information connected with fill-ups, so drivers can track local weather data and evaluate how it impacts their vehicle's performance.

Customer success and wellbeing

Helping SMEs to thrive continued

IRO management and achievements continued

Anti-fraud systems

In 2024, we prevented the theft of 1.2 million litres of fuel, worth ~€1.8 million. Although there was a 20% increase in fraudulent activity compared to 2023, in 60% of the >1,300 individual fraud cases identified during the year, there was no damage incurred by the customer thanks to our Card Lock, Fuel Guard and 24/7 monitoring and security measures. The total loss in the remaining 40% fraud cases was €500,000, which is lower than in 2023 and 2022. Pablo, the predictive anti-fraud tool developed in-house using neural network technology, was launched and is now in pilot phase. We also developed and launched multi-factor authentication, protecting our customers' accounts still further.

Expanding mobile payment coverage

In 2024, the number of locations supporting mobile payment grew from 840 to more than 2,000, across 15 countries, and we ran several marketing campaigns to raise awareness of the customer benefits of Eurowag Pay. As a result, the number of mobile payment transactions doubled compared to the previous year, making life easier and safer for even more customers.

Working time management (“WTM”)

Eurowag's WTM solutions enable customers to ensure they are operating effectively according to current local legislation, for example when national minimum wages and remuneration rates change. These updates ensure customers comply with international wage standards, and the TachoScan software now automatically converts foreign salaries into the default settlement currency. In 2024 the infringement module included in the new tachograph solution allows users to monitor drivers' working time violations, with each infringement marked with a level of seriousness based on EU regulations, and enhanced data reporting enabled more comprehensive data analysis and greater searchability for better usability and efficiency.

Navigation

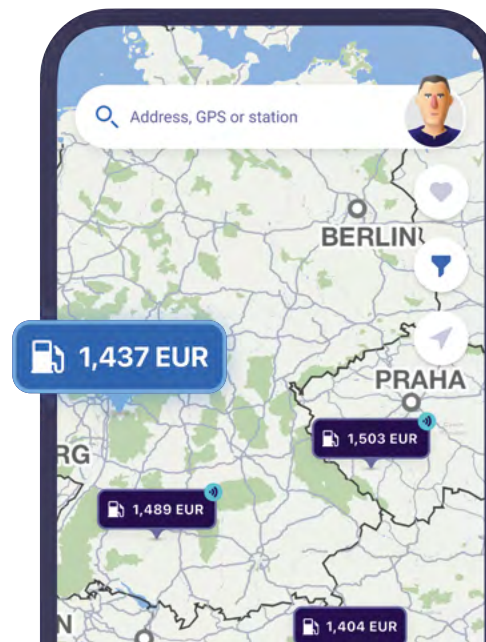
In 2024 we added a number of features to improve journey efficiency including widgets for fuel management and driver behaviour, adding gas station details including fuel type, price and opening hours.

Next steps

In 2025, we will focus on:

- › Following the initial launch in 2024, we will continue the phased development and roll-out of the Eurowag Office platform, as we continue to migrate more services and customers into the interface.
- › Introducing e-wallet functionality, enabling customers to manage payments and finances more efficiently within the platform. We hope to begin to roll out our automated customer finance credit model during H2, and to launch a new Systematic FX towards the end of 2025, giving full transparency on foreign exchange rates.
- › Collaborating with OEM partners to integrate our navigation app into vehicles, providing drivers with accurate, real-time routing information tailored to their specific needs.
- › Launching our virtual fuel card and digital PIN, so mobile payments will no longer rely on physical fuel cards. Virtual fuel cards reduce the risk of theft, and owners can easily set spending limits and usage parameters. Virtual cards can be generated instantly, offering greater flexibility, can be used for various on-the-road services and added to mobile payment platforms enabling contactless payments. In 2025 we aim to add another 1,500 mobile payment locations and we are exploring the possibility of future integration with telematics solutions.

- › Increasing the efficiency of our predictive anti-fraud tools by adding self-evaluating and self-balancing features.
- › Further developing our cold chain monitoring features, enabling dispatchers to remotely set and adjust the temperature of refrigerator units in trucks, removing the need for drivers to manually configure temperatures, and extending this feature to both storage and transport modes for seamless cold chain management.



Customer success and wellbeing

Improving wellbeing and safety for truck drivers

The shortage of truck drivers across Europe remains a challenge and the attractiveness of the profession to young people and to women continues to be perceived as low.

An ageing workforce and regulatory changes put strain on capacity whilst drivers continue to encounter difficulties on the road, including long working hours, limited access to quality rest facilities and concerns about physical and mental wellbeing. Eurowag is committed to supporting the overall health, wellbeing, safety and job satisfaction of truck drivers. Through our diverse range of products and services, we strive to foster a stronger sense of community, improve working conditions and support driver welfare.

Priorities

- › S2 improve wellbeing of drivers
- › Building drivers' social network through our digital platforms
- › Improving the quality and security of facilities for customers at truck parks
- › Introducing tech services to improve driver behaviour and safety

Progress

In 2024 we launched a new survey, sent directly to drivers, to give us insight into their opinions and experience of what more Eurowag could do to support their safety whilst driving, whilst at our truck park facilities and improve their wellbeing through our products, services and tools. We gained useful input for our service development and established the following baseline scores, which we aim to improve upon year on year:

Eurowag improves drivers' wellbeing:

77%

Eurowag supports drivers' safety at our facilities:

77%

Eurowag supports drivers' safety while on the road:

76%

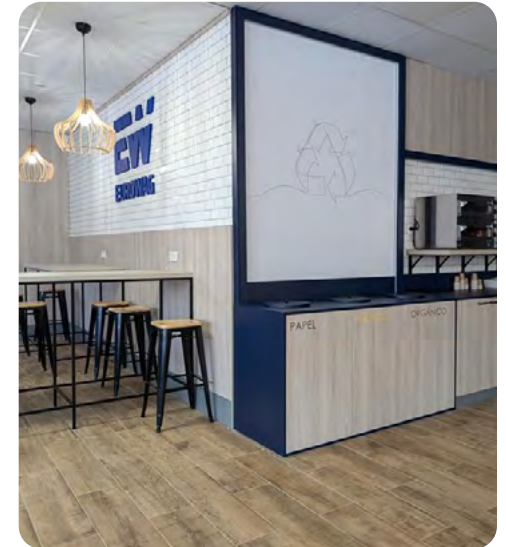
IRO management and achievements

Facilities for drivers

In order to support drivers' wellbeing, in 2024 we opened an innovative "nano-shop" and 24/7 coffee machine at Kozomín truck park in the Czech Republic, welcomed a permanent food truck at Llers and finished the refurbishment of a drivers' lounge at Arraia, Spain, with cooked food, coffee and drinks available as well as toilet and recycling facilities.

Incident reporting

Users of Eurowag Navigation are able to report incidents such as traffic, road closures, adverse weather conditions, car crashes, vehicles blocking roads etc. via our app and this data is shared with the whole community. This feature was launched in July and by year end, more than 261,000 incidents were reported by users and shared to the community.



Events for truck drivers

We continued our annual Christmas events celebrating drivers for the fifth year on our truck parks, with our largest roadshow yet across six locations in the Czech Republic, Slovakia, Poland, Hungary, Romania and Spain. From upcycled decorations to reusable treat boxes, we showed that sustainability and festive joy can go hand in hand. We also held the second edition of Eurowag Truckers' Day at Llers station in Spain, to recognise and celebrate the hard work carried out by truck drivers every day of the year.



Customer success and wellbeing

Improving wellbeing and safety for truck drivers continued

IRO management and achievements continued

Geofencing

Through the integration of Inelo's GBox with Eurowag's telematics, we developed our geofencing functionality to enable drivers to identify where they can park safely, report break-ins or thefts. They can also make emergency calls 24/7, which is very well used and appreciated by customers.

Preventative health checks

Through our new partnership with preventative health charity Loono, we supported a targeted campaign promoting awareness and tips for early identification of prostate and testicular cancer, two of the most common types of cancer affecting the average truck driver demographic.



Inclusiveness in CRT

We sponsored the National Congress of Women in Transport in Spain, where we took the opportunity – together with influencer and brand ambassador Oti Cabadas (“Cocotruckergirl”) – to address issues such as equality, inclusiveness, safety and female representation in our sector.

Expanding road services for drivers

We have added 129 parking sites to our network total of 635 parking sites across Europe, where drivers can use the Eurowag card to pay for additional services, including truck washing, tank cleaning and truck repairs. We offer washing and tank cleaning services

at our truck park in the Czech Republic and added 197 acceptance network or partner co-operation locations to a total of 1,302 sites across Europe. We have added 35 to a total of now 607 sites that offer truck repair services across Europe via partner co-operation.

Vision reconsidered

Our planned “Vision” product development to pilot image recognition and line crossing was postponed due to lack of customer demand. We continue to listen to our customers to help us to identify what features and functionality would be most appreciated for improving driver safety.

Next steps

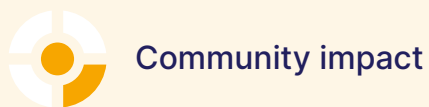
In 2025 we plan to:

- › Run a “Road to Health” truck drivers health awareness campaign with our new social impact partner EZB Foundation.

High market demand and staff shortages mean that drivers are often utilised to the maximum extent. Many drivers, particularly owner-drivers managing their own business, spend rest breaks handling administrative tasks, reducing the effectiveness of their downtime and increasing the risk of accidents.

Through this campaign, Eurowag and EZB Foundation will run a series of events in parking lots and service areas, offering medical tests, first aid training, massages and physiotherapy guidance demonstrating exercises drivers can do to take care of their body on the road. If it proves successful, we plan to expand the initiative further.

- › Add “rating” to the incident logging in Eurowag Navigation, so users can like/dislike logged incidents and therefore substantiate the quality and validity of the reports.
- › Launch advanced filtering of fuel stations in our maps, including by driver services including shop, wi-fi, restaurant, shower, secure parking etc.
- › Build an action plan to address top insights gathered through 2024 driver survey results.
- › Further improve driver behaviour products and integrate their features into our digital platform.



Community impact

Making a positive impact in our local communities

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- 35 Why it matters to Eurowag
- 36 Making a positive impact in our local communities



With Eurowag's support, we brought our road safety and first aid programmes to almost 4,000 children. It was a big challenge, but an even bigger joy."

Robért Jakab,
Asociația Keep Hope Alive

Links to SDGs



Goals

>80%
of eligible employees participating in
Philanthropy & You

 Community impact

Why it matters to Eurowag

Ambition

At Eurowag, we are committed to making a measurable, positive social impact in the communities where we operate. Our community impact programme is designed around three strategic focus areas, closely connected to the CRT and tech industries we operate in, and to Eurowag's purpose to make CRT clean, fair and efficient:

1. The trucking sector

- Supporting families who have lost loved ones during their work as professional drivers

- Driver health and wellbeing, working conditions, driver shortage, upskilling and reskilling
- Road safety
- Supporting SME trucking companies and drivers with e.g. financial literacy or sustainability know-how

2. Diversity in the tech sector

- Supporting women and girls in tech and IT
- Equalising opportunity including access for marginalised groups

3. Innovation for more efficient and sustainable transport

- Supporting research and development to transform the negative environmental impacts of the CRT, including air pollution, e.g. aerodynamics, tyres technology, materials innovation

Our CSR strategy and annual programme of initiatives is overseen by our cross-functional CSR Steering Committee



Targets and performance

Ambition	Baseline	2024 progress	Target
Employee participation in Philanthropy & You	n/a	<div style="width: 66%; background-color: #FFC107;">66%</div>	>80%

Impacts, risks and opportunities

This is the preliminary IRO identified as material, pending limited assurance of our DMA:

ESRS Category	ESRS Sub-topic	Eurowag IRO	Actual / potential	Impact/Risk/ Opportunity	Value chain	Timeframe
S3 Affected communities	Entity-specific	Avoid noise and light pollution from truck park operations	Potential	—		S M L

Impact/Risk/Opportunity

- Positive impact
- Negative impact
- Risk
- Opportunity

Value chain

- Upstream
- Own Operations
- Downstream

Timeframe

- S** Short
- M** Medium
- L** Long

 Community impact

Making a positive impact in our local communities

Each year, we enable our employees to give their time, skills and financial support to charitable organisations. Our community impact programme has three main elements: employee-led philanthropy, employee volunteering and corporate partnerships and initiatives for social impact.

Targets and progress

Philanthropy & You annual donation campaign	2022	2023	2024
Employee participation (no. employees / % eligible employees)	750 / 84%	1,047 / 79%	1,295 / 66%
Number of good causes supported	227	275	275
Total donation allocated (€000)	150	246	259
Number of countries	14	14	17

Material topics and priorities:

- > S3 Avoid noise and light pollution from truck park operations
- > CSR ambition of at least 1% pre-tax profit
- > Employee-led philanthropy
- > “Be Better” volunteering days – enabling employees to support good causes
- > Corporate partnerships and initiatives for social impact

IRO management and achievements

Eurowag employees give back

In 2024, we continued to build on the programme’s success by expanding its functionality, adding the Polish language to enable the participation of our colleagues from Inelo and redesigning

for easier sharing of good causes among employees. The platform is now accessible to colleagues across all countries where we operate.

In 2024, each employee was allocated €200 from the Eurowag Fund to support a cause of their choice, leading to €259,000 donated to over 275 good causes across 17 countries. The top supported area was aid for sick children (31% of donations), followed by animal care (19%), social and health care (16% and 13% respectively). With 1,295 colleagues participating, the highest annual figure achieved to date, the programme reflects the power of collective impact, driven by the commitment of our employees to make a difference.

Volunteering

One of Eurowag’s core values is to “Be a good person” and in 2024, we continued to encourage employees to volunteer their time and skills for non-profit organisations.

This “Be Better” initiative, which began in the Czech Republic, has now been rolled out across all our markets. Every employee is entitled to one day of volunteering annually, supported by our partner platform, Business for Society.

In 2024, 36 colleagues took part in various volunteering activities, including clean-up efforts, landscaping projects and collecting clothes for a shelter.

Corporate partnerships and initiatives for social impact

In 2024, we dedicated one-third of the community impact budget to charity partnerships and initiatives, including emergency relief responses in our local communities and markets.

Expanding on Eurowag’s long-running charity partnership in the Czech Republic, we broadened our programme to additional key geographies, focusing on collaborations with non-profit organisations aligned with Eurowag’s strategic social impact priorities.

This year, we continued our partnerships with TruckHELP Foundation (CZ) and Keep Hope Alive (RO), and established new partnerships with three non-profits: Aj Ty v IT (SK), Skool (HU) and Loono (CZ).

We also supported Movember with a number of activities, including partnering with influencer and brand ambassador Iwona Blecharczyk to raise awareness of the importance of this important cause by encouraging drivers to do regular self-examinations.

Standing together in times of crisis

In 2024, two large-scale natural disasters struck the communities and regions where we operate. In September, Storm Boris swept through central Europe, causing devastating floods across the region. We donated €10,000 to local charities (Adra, Člověk v tísní and Caritas) to provide immediate on-the-ground relief. Just a month later, at the end of October, Spain experienced one of its worst floods in recent history. Eurowag responded by contributing €10,000 to the Horta Sud foundation, a Barcelona-based organisation providing crucial support to affected local communities.

As the war in Ukraine continues to take its toll, Eurowag remains committed to supporting those affected. In 2024, we donated €30,000 to five organisations making a tangible difference on the ground: Martin Mádl, Junák, Rodina v Centru, MAS Brána Vysočiny and Člověk v Ohrožení. Our contributions have supported a range of initiatives focused on community integration, family support and education.

At Eurowag, we believe in the power of solidarity and the responsibility of businesses to take action in times of crisis. By standing with affected communities, we hope to bring not just relief, but also hope and resilience in the face of adversity.

Community impact

Making a positive impact in our local communities continued






IRO management and achievements continued

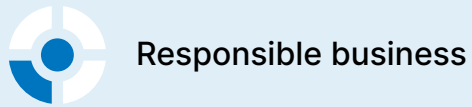
S3 Avoid noise and light pollution from truck park operations

Through the DMA, we identified a potential negative impact of noise and/or light pollution from Eurowag's truck park operations. No incidents or complaints have been received in recent years, but due to the proximity of four of our truck parks to residential neighbourhoods and an increase of heavy-duty traffic, we will develop a policy and action plan to ensure that the potential risk of negative impact is mitigated.

Next steps

In 2025, we will extend our social impact partnerships to additional geographies including Slovenia and Spain, and we are exploring the possibility to expand the strategic scope to include wider environmental impact opportunities to create a broad "People and Planet" impact programme.

Partner	Country	CSR pillar	Project description	Outputs	Outcomes	Highlight
	CZ	Trucking sector - supporting families of professional drivers	Supported families of truck driver road accident victims	<ul style="list-style-type: none"> 42 children supported throughout the year 	<ul style="list-style-type: none"> Financial relief for families Study motivation for children Hobbies support Core activities including Christmas meet-up 	<ul style="list-style-type: none"> Regional first place in a "youth band" competition, by one of the supported children, resulting in a CD release
	CZ	Trucking sector - driver health and wellbeing	Promoted health awareness and cancer prevention through a targeted health & prevention campaign	<ul style="list-style-type: none"> Workshops, blog posts, video podcasts, push notifications in Loono app, newsletter 	<ul style="list-style-type: none"> Increased engagement in self-check (coming through Loono's Preventivka app) Increased awareness of testicular/prostate cancer 	<ul style="list-style-type: none"> Record engagement on the topic across channels, above-average organic male interest despite traditionally female audience
	SK	Diversity in the tech sector - supporting women and girls in tech and IT	Supported a unique project aimed at attracting young talents to IT positions	<ul style="list-style-type: none"> Girls' Day event, IT positions project (12 positions described, ~500 secondary schools reached) 	<ul style="list-style-type: none"> Increased awareness of IT positions among prospective professionals 	<ul style="list-style-type: none"> Hosted eight high school students into our Bratislava office on Girls' Day, to introduce what a woman's career path in tech can look like and inspire with practical games and activities
	RO	Trucking sector - driver health and wellbeing	Expanded our partnership campaign designed to raise awareness of road safety, prevent road accidents and provide first aid training for young and professional drivers	<ul style="list-style-type: none"> Road safety classes at schools (~4,000 participants), public festivals and events 	<ul style="list-style-type: none"> Increased road safety awareness for children, through innovative learning methods ("drunk goggles", driving simulator etc.) 	<ul style="list-style-type: none"> With Eurowag's support, the Association managed to secure a "mobile lab" to reach schools and events across the region more effectively
	HU	Diversity in the tech sector - supporting women and girls in tech and IT	Started a partnership to spread education and provide skill-based volunteering, enabling access to innovative learning for kids and young people interested in IT careers	<ul style="list-style-type: none"> Two one-day workshops (including skill-based volunteers), "STEMsister" scholarship programme and Rolling Office initiative 	<ul style="list-style-type: none"> Increased IT awareness and interest, progressive educational techniques 	<ul style="list-style-type: none"> 12-week-long scholarship for selected mentees, providing a kick-start into an IT career



Company culture and governance

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- 40 Promoting diversity, equity and inclusion
- 42 Workplace engagement and wellbeing
- 44 Responsible business conduct
- 46 Human rights and modern slavery



Culture isn't set by our leaders - it's created by each one of us. While leaders may guide the way, it's our collective actions and commitment that truly shape the environment we thrive in. Together, we build the culture we wish to see."

Sidonie Myers,
Head Internal Communication and Culture


Links to SDGs



Goal

40%

women in leadership roles by 2025

 Responsible business

Why it matters to Eurowag

Ambition

Eurowag is committed to embedding responsible business practices at the heart of everything we do. Our ambition is to foster a culture of integrity, transparency and respect, actively promoting diversity, equity and inclusion throughout our organisation. We place significant emphasis on employee engagement, creating a workplace where individuals feel valued, empowered and inspired. We uphold the highest standards of responsible business conduct and by consistently applying these values, we strive to make a positive impact on our employees, partners and the wider community.

Impacts, risks and opportunities

These are the preliminary IROs identified as material, pending limited assurance of our DMA:

ESRS Category	ESRS Sub-topic	Eurowag IRO	Actual / potential	Impact/Risk/ Opportunity	Value chain	Timeframe
S1 Own workforce	Working conditions	Work-life balance	Actual	+		S M L
		Health and safety	Actual	-		S M L
	Equal treatment and opportunities for all	Gender equality and equal pay for equal work	Potential	-		S M L
		Protecting workers from risks of violence or harassment at truck parks	Actual	-		S M L
		Employment and inclusion of people with disabilities	Actual			S M L
		Diversity	Potential	-		S M L
		Gender pay gap	Actual	!		S M L
	Other work-related rights	Employee data privacy	Potential	- !		S M L
S2 Workers in the value chain	Other work-related rights	Child labour and/or forced labour in the supply chain	Potential	-		S M L
S4 Consumers and end-users	Information-related impacts for consumers	Customer data privacy	Potential	- !		S M L
G1 Business conduct	Management of relationships with suppliers including payment practices	Late payment practices	Actual	-		S M L
	Protection of whistleblowers	Protection of whistleblowers	Potential	-		S M L

Impact/Risk/Opportunity

Positive impact Negative impact Risk Opportunity

Value chain


Upstream Own Operations Downstream

Timeframe

Short Medium Long

Targets and performance

Ambition	Baseline	2024 progress	Target	Year
Women in leadership roles	2021: 28%	37%	40%	2025

 Responsible business

Promoting diversity, equity and inclusion

We believe that our greatest strength lies in the diverse perspectives, experiences and backgrounds of our people.

Our commitment to diversity, equity and inclusion (“DEI”) is rooted in the understanding that diversity, especially within leadership, is essential for cultivating an inclusive workplace, enhancing innovative thinking, and driving creativity and effectiveness. Creating an inclusive atmosphere where everybody feels safe to speak up allows us to fully harness the benefits of diversity. Our aim is to foster an environment where everyone’s uniqueness is not only accepted but actively celebrated.

To focus our impact, we began our DEI journey by addressing gender diversity as the first priority of our long-term diversity strategy. Increasing the representation of women in leadership roles is not about positive discrimination; rather, it ensures we benefit fully from the broad range of perspectives and experiences necessary for a collaborative, inclusive, and high-performing culture. Recognising that our industries remain predominantly male-dominated, we continue to address unconscious biases and actively encourage female representation, ultimately enriching our workplace and strengthening our business performance.

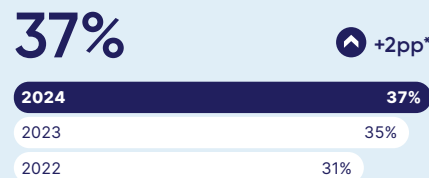
Material topics and priorities

- S1 Gender equality, gender pay gap, equal pay for equal work
- S1 Diversity
- S1 Employment and inclusion of people with disabilities
- Inclusive recruitment
- Learning and career development
- Network and community

Targets and progress

40%
women in leadership roles by 2025

Women in leadership



* Percentage change 2023–2024



At 2024 year end, the Group’s overall gender breakdown was 54% male and 46% female, with 21% of senior managers identifying as female. The senior manager population encompasses members of the Executive Committee and Vice Presidents (excluding the Chief Executive Officer and Chief Financial Officer).


We have set a target to increase female representation to 40% by 2025 among our “all people leaders” group. In 2024, the total number of all people leaders amounted to 358 individuals. Among them, 131 identified as female, representing 37%, an increase from the 35% recorded in 2023.

IRO management and achievements

Inclusive recruitment

We introduced gender-neutral job postings and diverse interview panels, laying the groundwork to formalise inclusive hiring policies and processes in collaboration with our Talent Acquisition team and HR Managers in 2025.

Eurowag also partnered with Aj Ty vIT, a Slovak organisation promoting women’s participation in IT, reinforcing our commitment to promoting gender diversity in the tech sector. Together, we conducted a workshop for high school girls and supported campaigns encouraging more young women to consider technology careers.



Responsible business

Promoting diversity, equity and inclusion continued

IRO management and achievements continued

Women's engagement and community

Following the launch of our Women's Network in 2023, this year we continued to organise both virtual and local meet-ups, successfully extending our engagement efforts to all acquired businesses. These gatherings provided valuable insights into the unique needs of local employees, enabling us to pinpoint specific areas where additional support and resources are necessary. These insights now inform the ongoing development of our inclusive workplace policies.

A key highlight this year was the Women's Summit, featuring our brand ambassador, Iwona Blecharczyk, who delivered an inspiring keynote address. Sharing her transformative journey from truck driver to entrepreneur, she encouraged women throughout the Eurowag community to connect, pursue their ambitions and find inspiration in each other.

Learning and career development

In 2024, we successfully piloted an internal mentoring initiative, pairing 24 women from across our organisation with experienced leaders and subject-matter experts. This programme fostered valuable knowledge exchange, personal growth, and future career progression. Feedback emphasised how the mentoring experience significantly enhanced participants' self-awareness and reinforced their sense of belonging and inclusion. Building on this success, we will relaunch the initiative in 2025, with applications opening on International Mentoring Day, 17 January.

Inclusion of people with disabilities

As part of our Group Equal Opportunities, Anti-Bullying and Anti-Harassment Policy, we explicitly prohibit discrimination of people with disabilities and outline guidance for managers as well as employees who may have a disability. Our policy covers direct and indirect discrimination, unjustified and less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

In addition, in the Czech Republic and Slovakia, we are proudly partnering with suppliers where more than 50% of their workforce are people with disabilities. As the employment and inclusion of people with disabilities was identified as an opportunity in our DMA, we will review our policy and potential action plan during 2025.

Board diversity

As at year end 2024, 33% of the Group Board's members identified as female. The reduction from the previous year was the result of the retirement of Susan Hooper from the Board and the appointments of Sophie Krishnan and Kevin Li Ying. The Senior Independent Director position is held by a female, Mirjana Blume. The Board has committed to meeting the FCA's diversity requirement and its own aspirations to 50% female representation in its Diversity and Inclusion Policy as a medium-term objective.

The following table provides an overview of additional 2024 data points:

	2021	2022	2023	2024
Number of employees	1,047	1,329	1,859	1,962
% male (total employee number)	59%	59%	54%	54%
% female (total employee number)	41%	41%	46%	46%
Number of senior managers	21	22	19	24
% male (senior management)	86%	86%	84%	79%
% female (senior management)	14%	14%	16%	21%
Number of all people leaders group	208	291	344	358
% male (all people leaders)	72%	69%	65%	63%
% female (all people leaders)	28%	31%	35%	37%
Number of Directors	8	8	8	9
% male (Board level)	62%	62%	62%	67%
% female (Board level)	38%	38%	38%	33%

Next steps

In 2025 we will continue to deliver on our strategic priorities, including:

- › We will hold regular Women's Network events, mainly on site across our office locations.
- › We will open the mentoring programme to another cohort of female mentees, looking to develop their professional and leadership skills.
- › A dedicated working group will enhance recruitment practices to attract more female candidates, ensuring recruitment partners actively support this goal through targeted candidate sourcing and increased visibility at recruitment events. We will implement bias-free hiring practices through a structured, inclusive hiring process and mandatory bias-awareness training for all talent acquisition teams, hiring managers, the Executive Leadership Team and broader management groups.

 Responsible business

Workplace engagement and wellbeing

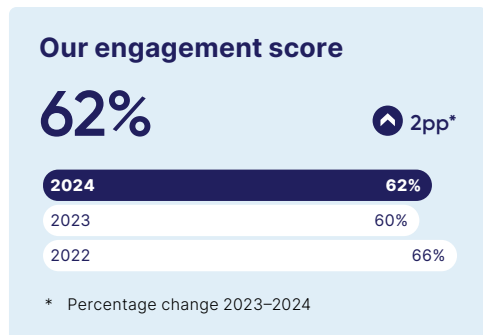
Our culture is defined by our values and we make wellbeing, health and safety and engaging our employees key priorities. We want to be an employer of choice in the markets where we operate.

We measure the level of employee engagement through an annual survey, as well as pulse surveys throughout the year. These formal survey tools help us understand the concerns and issues that are top of employees' minds and enable us to respond quickly as part of enhancing the employee experience.

Material topics and priorities

- S1 Work-life balance
- S1 Health and safety
- S1 Protecting workers from risk of violence or harassment
- Open and inclusive communication
- Making Eurowag a great place to work, with high-quality professional development opportunities and benefits

Targets and progress



In 2021, we set a goal of achieving a top 25% employee engagement score benchmarked against EU tech companies by 2025. Due to changes in our business, including the significant acquisitions over the last four years, this target no longer provides the most relevant approach to evaluating engagement, and other factors such as leadership, satisfaction, productivity, diversity and inclusion. We remain committed to being an employer of choice and continuously enhancing our employee experience, and we are now working to identify a more relevant and meaningful benchmark going forward.

IRO management and achievements

Employee engagement

In 2024, we continued to focus on improving two-way communication, which employees had rated low in previous surveys, and increasing the visibility and trustworthiness of the Executive Committee team. To do so, we consistently used the communication channels between management and employees introduced the previous year, including all-employee Town Halls focused on our financial results, monthly All-Hands meetings for each functional area of the business, regular Group News sessions and Senior Leadership Q&A sessions. All meetings are supported both in-person or online and are accessible for colleagues from all parts of the Group.

In 2024, we replaced our Company newsletter with short-form video content on current topics. We have also introduced Viva Engage to spark conversations and create a sense of community among our employees. Viva Engage and short-form videos, together with the newly created self-service areas and revamped look, have helped us improve our intranet experience, giving all employees quick and easy access to the information they need to be successful in their role. We average around 50,000 visits to our intranet each month and the Viva Engage posts in our “All Company” community have averaged 45,000 views per month.

In 2024, we continued to improve the employee experience as we further digitalised employee processes, accessed through our central HR self-service information system called Bob. Our Culture AMP application, an engagement, performance and development management system, also enables 360-degree feedback processes.

Culture and values

Our People and Culture Ambassadors Network was launched in 2023 to support our cultural transformation journey and help to improve our employee engagement and the overall employee experience. During 2024, 40 colleagues from across the organisation worked together, focusing on key areas:

- Culture, diversity and inclusion
- Tech innovations and improvements
- Promotion and storytelling
- Sharing Company purpose and strategy

The ambassadors play an important role by connecting with colleagues, sharing ideas, and influencing leaders. The network gives them a platform to share ideas to improve ways of working and help shape new initiatives.

This experience also benefits the ambassadors by giving them access to senior leaders, the chance to develop new skills, learn more about the Company, and build connections with colleagues across Eurowag.

The key project for the People and Culture Ambassadors Network in 2024 was refreshing the Culture Manifesto, which represents the values of the entire Eurowag Group. Through focus groups, the ambassadors shared their local cultures and values, helping us combine the best elements from all cultures into one unified and relevant manifesto for everyone.

Every year, we recognise colleagues and leaders who are true role models and demonstrate our values in everything they do, through our Culture Champions awards.

Learning and development

Through our learning and development initiatives, we are looking to support our colleagues' personal and professional growth, through training programmes, e-learning courses, workshops, career development tools and certification opportunities.

As a way to support our current and future leaders, we launched the Leadership Design Journey, a framework that nurtures our employees' leadership capabilities, and the Extended Leadership Team community – a development programme that engages 48 of our senior leaders in strategic business topics.

Responsible business

Workplace engagement and wellbeing continued

IRO management and achievements continued

Learning and development continued

Going forward, we will further support our leaders by launching AI-driven coaching platform Nadia for ~200 people leaders, as well as Team Development Platform Valence, which incorporates team diagnostics and best practice guidance to help our managers become better people leaders.

Other resources available to our employees include Goodhabitx, a digital training library which offers access to more than 175 topics including leadership, communication, creativity, diversity, productivity and digital skills. We also offered self-study opportunities on Coursera and online language tutoring.

In 2024, we introduced a talent review process to ensure a fair and thorough identification of high potential employees and succession planning across the organisation. This approach will be scaled up to ensure we successfully develop our internal talent pipeline.

Employees who completed training	Providing a safe and respectful workplace	Human rights and modern slavery
2024	1,208 (80%)	1,798 (84%)
2023	1,268 (92%)	1,537 (75%)

Employees who completed training	Professional psychology – Mojra	Professional self-study – Coursera	Professional self-study – Preply
2021	15	400	201
2022	19	140	260
2023	57	284	260
2024	86	260	301

Workplace wellbeing

At Eurowag, employees' health and wellbeing are top priorities. We offer accessible support and resources for mental health and overall wellbeing support during challenging times, such as bereavement, relationship issues, childbirth, financial stress or workplace changes. Recognising that work can significantly impact mental health, we proactively foster a supportive and inclusive workplace environment. Our aim is to prevent mental health difficulties and ensure that employees facing such challenges feel empowered, supported, and able to thrive in their roles.

We offer psychological consultancy to all our employees Group wide, through the online platform Mojra. In 2024, we increased the number of sessions employees can book, from five to ten, with therapists now available in 15 different languages.

Health and safety of our employees

We take the health and safety of our employees seriously. The Group follows a Group Health and Safety Policy that outlines our approach to safeguarding our people and promoting a healthy workplace. The HR function, country managers and truck park managers are responsible for implementing the policy and ensuring compliance with relevant statutory frameworks. There is an additional Health and Safety Policy for the retail network.

In 2024, we documented one work-related incident in our truck parks and three in our offices, all of minor severity.

Employees who completed training	Occupational safety for managers	Occupational safety for employees	Fire protection for employees	Fire protection for managers
2024	45 (83%)	522 (92%)	492 (86%)	59 (87%)
2023	47 (81%)	479 (91%)	487 (91%)	50 (88%)

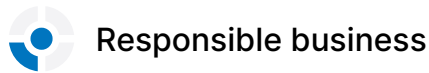
Next steps

In 2025, our primary focus will be enhancing the employee experience by developing a comprehensive and attractive employee value proposition and fully integrating all new subsidiaries into centralised HR policies and systems.

We will launch the Women's Mentoring Network in Q1, following a successful pilot in 2024, alongside introducing a Coaching Development Framework to provide targeted coaching support to our leaders. Additionally, we'll strengthen our learning culture through the launch of a new Learning Experience Platform, which consolidates development opportunities and enables data-driven decision-making for employee growth. We aim to embed these learning solutions deeply, establishing clear frameworks for developing functional skills, particularly in our product, technology, and finance teams.

To continually engage employees, we'll focus on equipping managers with the skills and data insights necessary to effectively respond to feedback and improve team engagement.

To ensure that we are actively addressing the material topics within health and safety, we will recruit a Group Health and Safety leader and publish an operational handbook for our truck parks.



Responsible business

Responsible business conduct

At Eurowag, we are committed to conducting business ethically and responsibly, adhering strictly to applicable laws and industry standards across all our operations.

Our approach to responsible business conduct is guided by our governance framework, which clearly defines our expectations for employees, suppliers and business partners. This framework encompasses comprehensive policies addressing anti-bribery and corruption, anti-money laundering and terrorism financing, personal data protection, conflicts of interest, fair competition, and fraud prevention, ensuring full compliance with international standards as well as national laws and regulations.

Material topics and priorities

- › S1 Employee data privacy
- › S2 Child labour and forced labour in the supply chain
- › S4 Customer data privacy
- › G1 Payment practices
- › G1 Protection of whistleblowers, anti-bribery and corruption
- › Promoting sustainable supply chain practices and responsible procurement

IRO management and achievements

Business ethics

We continue to operate and improve our governance structure, which consists of teams responsible for the management of agendas linked to legal, compliance, customer privacy and data security, anti-corruption and anti-bribery, conflicts of interest, protection of whistleblowers, ethical business conduct, transparency, and financial regulatory compliance and selling practices.

We focused particularly on the redesign of our anti-bribery, anti-corruption and conflict of interests areas, as well as on physical and personal security in 2024.

We maintain a comprehensive compliance framework, aligned with globally recognised standards and consistent with international sanction regimes. We adopt several key policies, including:

- › Anti-harassment and anti-bullying
- › Modern slavery and human trafficking
- › Personal data protection
- › Anti-corruption and anti-bribery, including gifts
- › Anti-money laundering and terrorism financing, including incorporation of international embargoes and sanctions
- › Protection of whistleblowers
- › Conflicts of interest

- › Our codes of ethics (for employees as well as for suppliers) outline our standards and guide the way we do business across our operations. These two key documents have been refreshed following the acquisition of new companies, to ensure we embed their specific culture into the existing Group culture and reflect new responsibilities as well

› Procurement Policy

We have a well-established quality assurance function, led by the VP Legal and Compliance/ General Counsel, which is responsible for our quality processes covering product, services and processes. The function oversees the quality management system.

All truck parks under our direct control in the Czech Republic and Poland are ISO 14001:2015 certified, which defines the minimum operating standards for fuel stations and car washes. On top of continuous improvement prescribed by the standard, we are in the process of securing certification in other countries.

Anti-bribery, corruption and conflict of interests

Eurowag has an end-to-end anti-bribery, anti-corruption and conflict of interests system in place, starting with Group-wide policy, followed by an operational guideline where we define minimum preventative standards, measures and controls. We provide training for employees and anyone can report any suspicion through a dedicated internal whistleblowing line.

In the event of a breach of procedure, the undertaking will take swift and decisive actions to address the issue, conducting thorough internal investigations to determine the extent and nature of the breaches. Upon confirmation of misconduct, appropriate disciplinary measures would be implemented, ranging from corrective actions and retraining to more severe consequences, such as termination or legal proceedings.

In 2024, we did not have any confirmed incidents of bribery or corruption. We did not receive any convictions or fines for violations of anti-corruption or anti-bribery law in the year, and were not subject to any legal action relating to corruption or bribery.

Sustainable supply chains and responsible procurement

In 2024, we ran an initiative to upgrade our supply chain due diligence and further develop our sustainable procurement processes.

Working together, the sustainability and procurement teams developed a new suite of tools for our purchasing teams:

- › Sustainable procurement risk tool: based on the country, spend, and type of supplier, our risk framework identifies potential risk on governance, environment, human rights and health and safety issues for our suppliers
- › If a supplier is flagged as risky, we can engage with suppliers using the new Supplier Engagement Questionnaire to get further detail and more accurately assess the level of risk and identify if the necessary prevention or mitigation measures are in place

Responsible business

Responsible business conduct continued

IRO management and achievements continued

Sustainable supply chains and responsible procurement continued

- › Lastly, we created additional ESG criteria for tender evaluations, to be considered alongside the traditional cost, quality and convenience criteria for key categories

In 2024, we started to engage suppliers on critical issues such as climate action, compliance and human rights. For example, with our major hardware supplier we co-operated on product carbon footprint calculations to better understand the emissions linked to our OBU products.

By continuing these efforts, we aim to mitigate risks, strengthen partnerships, and drive meaningful progress across our supply chain in 2025 and beyond.

Compliance ambassador network

We maintained this network in 2024 and supported the ambassadors with deep-dive compliance workshops and training including on data privacy, anti-bribery and corruption, conflict of interests, whistleblowing, anti-money laundering and partner screening.

Data protection and information security

At Eurowag, we see data protection and information security as essential, not only for safeguarding our operations but, importantly, for maintaining the trust and privacy of our customers, regulators and business partners

We respect our customers' and partners' rights to privacy and control over their data, handling it professionally and transparently, in accordance with recognised industry standards. We clearly communicate how we use data and the benefits this brings to our customers and partners. Our risk, security and compliance teams define, implement and operate our cyber security programme including data protection, reporting to our Board's Audit and Risk Committee and the operational Business Assurance Committee.

Since 2021, we have focused on strengthening our security posture and maturity by implementing robust data and IT security policies, adopting industry best practices, enhancing risk management, and integrating privacy-by-design principles into our systems. We also invested in training and risk assessments to continuously improve our approach. To bolster our data security, we enhanced perimeter security and improved user communication protocols. In 2024, we focused on implementing an internal data classification framework and introduced advanced tools for monitoring and managing cyber security threats in real time.

Speak Up (Whistleblowing)

In 2024, we fine-tuned our Speak Up (Whistleblowing) procedure and promoted our reporting channel, the Eurowag Integrity Line, which fully complies with all applicable legislation and empowers individuals to address their concerns about possible violations of Eurowag's ethical principles and values.

All current and former employees, as well as third parties, can use this confidential and easily accessible mechanism for raising concerns about unlawful or unethical conduct, so that we can identify and tackle any problems quickly. Stakeholders can raise concerns confidentially with the compliance department through various routes such as the Eurowag Integrity Line (see eurowag.integrityline.com), email, phone lines and physical mailbox or go directly to the Chair of the Audit and Risk Committee. The Audit and Risk Committee Chair acts as an external escalation point for any items where top management may be involved or the compliance function may be in a conflict of interest. During 2024, we received four issues raised through the integrity line, related to internal employment conditions, compared to three in the previous year. All issues were investigated and addressed by the compliance team, and no violations of human rights were found. We have also cascaded our whistleblowing process down into our supply chains, so it can also be used by our suppliers and/or customers.

Compliance trainings

The compliance function regularly updates the content of the training modules and the HR department ensures all relevant Group employees are trained. The completion rate of compliance training in 2024 is below.

Next steps

In 2025, we will:

- › Redesign fraud risk management, fair competition, and personal data protection ("GDPR") processes, by fully reviewing and updating existing policies and procedures. This will include revising and enhancing training programmes in these areas and conducting Group-wide awareness campaigns to promote ethical behaviour among employees, managers, and contractors. Additionally, compliance training in other areas will be reviewed and improved to elevate the overall compliance training programme.
- › Deliver the next phase of our sustainable procurement project. We will continue to work on implementing the sustainable procurement tools that were developed in 2024 as well as embarking on the next phase of our project to identify and work with a small group of key suppliers to improve their sustainability practices.

Employees who completed training	AML and Partner Screening Policy	Anti-competitive Practices	Anti-bribery and corruption and conflict of interest	Insider trading	Anti-money laundering	GDPR – personal data protection	Information and cyber security	Whistleblowing and Non-retaliation Policy training
2023	1,842 (90%)	1,742 (87%)	1,822 (89%)	1,629 (80%)	191 (74%)	1,191 (88%)	901 (77%)	1,885 (91%)
2024	1,712 (82%)	1,741 (84%)	1,808 (86%)	1,618 (77%)	244 (71%)	1,290 (83%)	1,223 (79%)	1,767 (84%)



Human rights and modern slavery

We are committed to upholding the principles embodied in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.

We respect human rights in our operations and have created a work environment where we treat everyone with dignity and respect, and ensure it is free from harassment, bullying, and discriminatory or intimidating behaviour of any kind.

We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply or customer chains.

We state these commitments in our Code of Conduct, Group Procurement Policy, Code of Conduct for Suppliers, Group Modern Slavery and Human Trafficking Policy and Equal Opportunities, Anti-Bullying and Anti-Harassment Policy. Our Modern Slavery and Human Trafficking Policy, approved in 2022, explicitly states how we uphold human rights and tackle modern slavery throughout our supply chains. We also publish a Modern Slavery Statement.

In addition, our contracting processes with third parties include specific prohibition of the use of forced, compulsory, or trafficked labour,

or of anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their suppliers to the same high standards.

The Board has overall accountability for ensuring that the Group complies with its legal and ethical commitments to uphold and respect human rights and prevent incidents of modern slavery and human trafficking from occurring.

The Executive Committee has delegated responsibility from the Board for directing and overseeing the sustainability strategy, and ensuring that the related policies, including human rights and modern slavery, comply with our legal and ethical obligations.

The Sustainability function has primary and day-to-day responsibility for overseeing the implementation of the Company's Modern Slavery and Human Trafficking Policy, as well as monitoring its use and effectiveness, and auditing internal control systems and procedures to ensure that they are effective in countering modern slavery and respecting human rights.

Management is responsible for ensuring everyone understands and complies with this policy and is given adequate and regular training on it.

Progress

In 2024, we continued to improve our internal system and processes to upgrade our supply chain due diligence and engagement with our supply chain to promote sustainable and responsible business practices. We developed a new tool for supplier onboarding and screening of vendors for sustainability-related risks. We began the work of implementing the screening tool into Eurowag's procurement process, whereby the assessment includes potential risks linked to human rights, forced labour or modern slavery. In case a supplier is flagged as risky, we will engage with them to get further detail and better assess the level of risk. We also created ESG-related criteria for use in tender evaluations, including human rights and supply chain due diligence considerations.

Our contractual terms for suppliers continue to include a reference to our Code of Conduct for Suppliers and an expectation that suppliers will comply with the Code. A Speak Up (Whistleblowing) channel for our suppliers or value chain workers is available to raise concerns about any human rights concerns or issues. No concerns were raised through it in 2024 from our suppliers or value chain.

In 2024, Eurowag's sustainability and procurement team members participated in the UN Global Compact Business and Human Rights Accelerator¹. It was a six-month training programme to inspire action in and guide companies in their human rights due diligence process – covering value chain impacts, human rights impacts, action planning, stakeholder engagement, remedy and grievance mechanisms. The programme participation helped us better identify and assess our salient human rights impacts and develop an actionable plan. We integrated these insights into our impacts, risks and opportunities assessment.

To ensure that Eurowag employees are aware of the topic, a human rights training module was created and incorporated into our learning portal, and completed with an 84% completion rate in 2024.

Next steps

In 2025 we will integrate the results of the double materiality process into our strategy, policies and actions. This is linked particularly to material human rights-related impacts on our employees and value chains.

We will continue to work cross-functionally to strengthen our sustainable procurement approach by better assessing potential risks within our supply chain. We will also continue to monitor legislative developments linked to the Corporate Sustainability Due Diligence Directive.

¹ academy.unglobalcompact.org/.

Supplemental information

For data tables, reporting principles and methodologies, please scan the QR code below.



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