At MOIA, we are keen to make an important contribution to a fundamental shift in how people move in cities. MOIA ridepooling is a new mobility solution that makes cities better places to live, safer and more beautiful – for everyone.

As part of the Volkswagen Group, whose aim is to be CO₂-free by 2050 as per the Paris Climate Agreement, MOIA plays a major role in the transportation revolution.

First, we operate a fleet of electric vehicles only. This helps cities reduce air pollution. Second, together with our Partners, we contribute to the circular economy and ensure the sustainability of our product and services along their entire life cycle. Third, in our offices and hubs, we act sustainably and know that everything we do has an impact and contributes to minimizing the CO₂ footprint.

We, at MOIA, stand for our environmental mission: to protect our planet.

Our story

Sascha Meyer, CEO
Torben Menke, CFO
Our Goals

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We aim to become CO2 neutral at the latest in 2030.

💧 Resources
We maximize resource efficiency and promote circular economy.

👩‍💼 Air quality
We are driving e-mobility forward to improve local air quality.

☑️ Environmental compliance
We are compliant and want to be a role model in terms of environmental protection.
1. Objective

This policy governs the organisation and responsibility on the subject of the environment within MOIA. The aim is to ensure legal environmental standards while making the best possible use of synergies between all companies.

The MOIA mobility concept aims to relieve private transport in urban spaces to present mobility as locally emission-free. By shifting people from private transport to shared transport systems, and with the comparatively higher occupancy rate of MOIA’s vehicles and the electric propulsion technology, MOIA addresses the three major issues of cities - land use, air emission and noise emission.

As part of the Volkswagen Group, MOIA trails the following environmental goals:

- We are committed to the 2-degree goal of the Paris Climate Agreement and therefore constantly improving our carbon footprint. We aim to be a CO2-neutral company by 2030. In this way, we are also supporting the Volkswagen Group in its goal of achieving a CO2-neutral balance sheet by 2050.
• We promote the careful and efficient use of resources and support the use of circular economy approaches in the areas of materials, energy and water. In this way, we are constantly reducing our consumption of resources.
• We are pursuing the goal of advancing electromobility and thus ensuring an improvement in local air quality and continuously reducing pollutant emissions.

2. Scope
This policy applies to all employees of MOIA GmbH and its subsidiaries. The binding standards must be implemented by all companies.

3. Risk assessment
Failure to observe this policy may lead to negative environmental impacts and/or financial, criminal, and disciplinary consequences for employees, as well as loss of reputation for MOIA.

4. Terms and definitions
The meanings of the following terms are set out below in this policy, unless there is an explicit indication to the contrary in individual cases.

• The ECMS describes the Environmental Compliance Management System.

• The life cycle of our products and services begins with the design, development and constant further development of the software products for handling passenger transport and also includes the product cycle for operating the vehicles, from acceptance from the manufacturer to return, and operational management.

5. Roles and responsibilities
Compliance with this policy is the responsibility of management. Implementation is the responsibility of the Environmental Officer.

6. Fundamentals
6.1 Environmental Compliance Management System
MOIA aims to be a role model in environmental issues.

The following defines the minimum requirements for an effective Environmental Compliance Management System (hereinafter ECMS) to identify and manage compliance obligations and environmental risks and opportunities of our services.
The description of the minimum requirements for an effective ECMS takes the form of nine core premises. These core premises support the principles of the Environmental Policy Statement and are aligned with internationally recognised standards to enhance environmental compliance over the entire life cycle of our products and services.

The description of the minimum requirements for an effective ECMS follows this logic:

- The text in italics describes the fundamental beliefs of MOIA regarding the topic of each premise.
- The actions subsequently outlined describe the task that must be performed by MOIA as an operating organisation in order to fulfil the requirements of the premises.

The management is responsible for establishing, maintaining and improving the ECMS.
6.1.1 Premise 1 - Leadership and Commitment

MOIA aims to be a role model in terms of the environment. Therefore, we have made it our mission to address the greatest challenges of our time and to support cities in achieving their sustainability goals with our mobility solution. We are fully committed to the TOGETHER - Strategy 2025+ as well as the Environmental Policy Statement of the Volkswagen Group and express this in our own, MOIA-specific environmental policy. We implement an Environmental Compliance Management System to fulfil compliance obligations and to identify and manage environmental risks and opportunities across the entire life cycle of our products.

It is the task of MOIA, as an operating organisation, to adopt a specific environmental policy, based on the Group Environmental Policy Statement and communicate it appropriately within and outside MOIA. Management shall provide adequate resources for this purpose and for the ECMS to be developed.

MOIA provides training on the Environmental Policy Statement to all employees, so that they can pragmatically take the requirements of environmental policy into account in their day-to-day activities.

The requirements of this policy are integrated into the business processes. MOIA commits to the requirements of the Volkswagen Group Environmental Policy Statement by providing adequate resources and considering environmental leadership and compliance assurance during all strategy, planning and decision-making processes.

MOIA publishes the company-specific environmental policy statement on internal and external websites and at MOIA sites and communicates it to key business partners.

MOIA implements a company-specific ECMS that addresses and adequately takes into account the requirements of this policy on a risk-based basis. This includes creating and maintaining a work climate in which environmental compliance topics and challenges are openly addressed, amongst others through consistent leadership and decision-making.

Management reviews the implementation and performance of the ECMS at least annually through a management review and takes action to address weaknesses. The results of the management review are communicated to the Group.

6.1.2 Premise 2 - Responsibility and Accountability

It is the responsibility of leaders to ensure that this policy is effectively communicated, understood and implemented. All employees of MOIA are responsible for understanding how this policy applies to their day-to-day activities and how to fulfil the compliance obligations and contribute to strong environmental stewardship.

Management is responsible and accountable for compliance with applicable environmental laws, regulations and binding commitments, and for achieving or exceeding company-specific environmental goals and objectives. This includes responsibility for the reliability and accuracy of environmental data and the implementation of environmental compliance.
The Environmental Officer is appointed by management and is responsible for managing and controlling the implementation of the ECMS. The Environmental Officer reports directly to the CFO.

Management appoints a representative for the Group Steering Committee Environment and Energy (hereinafter referred to as: KSK UE) to ensure that MOIA’s business interests are adequately represented in the KSK UE. The representative shall be appropriately mandated and shall ensure a regular participation.

6.1.3 Premise 3 - Compliance Obligations

We comply with binding environmental commitments as well as voluntary commitments we have made to our stakeholders. We monitor emerging issues and keep abreast of relevant legal and regulatory changes, scientific advances, technological innovations and stakeholder expectations (see also Premise 7 - Stakeholder dialogue).

In order to successfully establish, maintain and improve the ECMS, the Environmental Officer has the following key responsibilities:

- **Establishment of a register of binding obligations**
  - Develop, document, communicate and update the environmental compliance obligations applicable at MOIA at least semi-annually (applicable statutory, legal and voluntary obligations).
  - Maintain access (IT system, alternatively via hardcopy) to the applicable compliance obligations.
- **Assign responsibilities to identify, evaluate, communicate and implement compliance obligations.**
- **Inform the Group about new compliance obligations, including follow-up.**
- **Review progress and report at least annually to management**
- **Monitor developments:**
  - Identify emerging trends that might require coordinated strategic involvement or a coordinated response from MOIA and subsequently communicate these to the relevant Group departments and management.
  - Monitor emerging trends in compliance obligations at national, regional and local level and their potential impact on operations and compliance, including communication with relevant personnel.
  - Follow-up and, if necessary, treat as a rule violation for possible violations of a binding obligation and communicate it to management.
6.1.4 Premise 4 - Managing Risks and Opportunities

We consider the actual and potential environmental risks and opportunities of our products and services across their entire life cycle. This helps us to improve our environmental performance over all stages of our business operations. We prepare for emergency situations to protect our employees, customers, communities and the environment. We maintain plans in order to respond properly to environmental incidents and emergency situations as well as to minimise and/or mitigate associated environmental impacts.

The environmental risks and opportunities of our core products and services (Pluto, hubs, charging infrastructure, apps, service territories, franchise projects etc.) shall be identified, evaluated and prioritised along the full life cycle. These shall be reviewed annually and updated if necessary. Environmental goals shall be considered in decision-making processes for new or modified products, facilities, services, equipment and processes. The Environmental Officer is involved in all relevant projects and change processes in order to be able to optimally assess environmental risks and opportunities.

Processes and procedures will be established, maintained and communicated to verify compliance with and implementation of binding commitments, environmental objectives, risks and opportunities.

6.1.5 Premise 5 - Improving Performance

We reduce our environmental impact through specific targets and objectives in line with the commitments outlined in Premise 3 and the Group strategy. We define environmental performance indicators throughout the entire life cycle of our operations to assess our environmental performance and set environmental goals for continual improvement. We share environmental good practices and lessons learned with the Group.

Based on the identified environmental risks and opportunities, documented and measurable targets are set annually to improve MOIA’s environmental performance. The environmental targets are communicated to management and the Group. Action plans are prepared that document key steps, responsibilities and timelines for achieving the environmental targets.

In addition, environmental targets and actions, indicators for environmental compliance and Group environmental principles are incorporated into business, product design and operational processes. This is reported to the Group at least annually, e.g. as part of the management review.

6.1.6 Premise 6 - Awareness and Competence

We ensure that all employees are fully trained to meet the environmental responsibilities and compliance obligations associated with their positions.

All employees at MOIA shall acquire the necessary competence on environmental issues to adequately perform environmental responsibilities, objectives and duties to raise environmental awareness. This includes the creation of an operating climate that supports the reporting of non-compliance and misconduct. To this end, the
necessary competence requirements in the respective areas of the MOIA companies are identified and job-specific training is provided and carried out. Likewise, the minimum requirements for environmental competence specified by the Group are adopted.

The aim is to enable all employees to fulfil their environmental responsibilities and implement compliance obligations. All employees shall receive an offer of basic environmental qualification training that, at a minimum, addresses this MOIA Policy, environmental targets, compliance obligations, responsibilities, performance expectations and the management of environmental misconduct/non-compliance. Identified groups of employees will receive advanced environmental qualification.

Environmental qualifications are regularly assessed for effectiveness.

6.1.7 Premise 7 - Stakeholder Dialogue

We engage in a transparent and open dialogue with stakeholders to understand their expectations, to collaborate on innovative approaches and to make our contribution to a socially and environmentally sustainable world. We communicate our environmental commitments, responsibilities and performance to internal and external stakeholders.

Internal stakeholders shall be identified and a dialogue on environmental responsibilities, environmental targets, compliance obligations and environmental performance shall be established and maintained to ensure the following:

- compliance obligations, strategies, targets and expectations are clearly understood and aligned;
- roles and responsibilities are clearly defined and agreed;
- the human and financial resources required to meet commitments are allocated;
- the environmental performance as well as the handling of rule violations or non-compliance is communicated.

Key external stakeholders from science, technology, industry, public authorities, government and non-governmental organisations will be identified and environmental collaboration will be explored. Respective information will be provided to the Group entities. MOIA shall communicate environmental responsibility, environmental goals, binding commitments and environmental performance to relevant key external stakeholders. Reports on environmental performance and on the handling of breaches of regulations or non-compliance shall also to be submitted to important external stakeholders.

The inputs, needs and expectations of relevant stakeholders should be considered in the design and implementation of the ECMS.

6.1.8 Premise 8 - Evaluating Performance

We are fully aware of the environmental impact of our activities, products and services. For this reason, we monitor the performance of the ECMS regularly and objectively, with the aim of continual improvement.
Key processes and activities are to be monitored to identify and address environmental impacts and risks and to take advantage of opportunities to improve environmental performance and compliance. Key performance indicators and progress towards environmental goals and compliance shall be tracked, documented and, where necessary, reported to relevant internal and external stakeholders as well as management.

One or more audit programs shall be established, implemented and maintained in order to conduct a structured assessment and review of compliance with binding legal, regulatory, MOIA-internal and other compliance obligations as well as compliance with Group and company-specific environmental requirements and objectives.

Particular attention must be paid to the qualification and independence of the auditors in order to avoid conflicts of interest.

6.1.9 Premise 9 - Managing Non-Compliances

We meet our obligations to comply with environmental protection regulations and performance targets. If we fail to meet our targets or compliance obligations, including the requirements of this Policy, we will investigate the reasons why and implement corrective actions to prevent recurrence and drive continual improvement.

A process for reporting, investigation, root cause analysis, follow-up and tamper-proof documentation of non-compliances identified within MOIA shall be implemented and maintained. Non-compliances can be identified from monitoring activities, audits, environmental incidents or employee reporting.

Violations of compliance obligations, including intentional misconduct and fraud, are considered to be environmental misconduct and are evaluated as such. However, the disciplinary evaluation and treatment of possible misconduct is not a subject regulated by this policy. The relevant regulations are those contained in MOIApolicies 3 and 35 in their respective valid versions. Nevertheless, it is MOIA’S responsibility to maintain and communicate access to complaint channels, such as the whistleblower system, to allow employees to report non-compliances.

For this purpose, the Environmental Officer investigates the environmental incident, determines the cause and deals with it using the PDCA cycle. Medium to severe environmental incidents must be reported to management.

7. Internal processes and controls

Goals and targets are defined as part of the MOIA ECMS and monitored by the Environmental Officer.