



BASSADONE  
AUTOMOTIVE GROUP

# DRIVING A SUSTAINABLE FUTURE

2025-2030



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of Sustainability

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Chapter 1

# THE PURSUIT OF SUSTAINABILITY







# OPENING REMARKS



George AC  
Bassadone O.B.E. G.M.H.  
Group President

*“Sustainability has always been personal to me, an enduring principle rooted in responsibility and care. I built this Group to stand for more than profit and seeing those values lived across the business is the legacy I am most proud of.”*



Max  
Bassadone

Group Chairman,  
Board Champion for Sustainability

*“The true purpose of being in business is to create a lasting, sustainable impact on the community and everyone your work touches. If you aren't committed to doing 'good', then the very reason for doing business is lost.”*



Kevin  
Jones A.C.M.A.  
Director,  
Honorary Chairman

*“Sustainability lies at the intersection of innovation and responsibility.”*



Philippe  
Saillard

CEO Bassadone Automotive Group

*“Sustainability is a mindset, a working philosophy which has been for long in our Group, a path to success to be always preserved.”*





# SUSTAINABILITY AT BASSADONE AUTOMOTIVE GROUP

At Bassadone Automotive Group, sustainability is not just an ambition - it drives our commitment to social, financial and environmental responsibility.

We are progressively embedding sustainability into the core of our business, influencing our decision-making, operations, logistics, and sales. The Group understands sustainability to mean:

## INNOVATION

We are committed to integrating innovation across every aspect of our business, embracing new digital technologies, and responding to the sustainability challenges shaping the automotive industry. We recognise that the way we operate today will look vastly different in the next decade, and we are actively preparing for that future.

## REGENERATION

To us, sustainability is about embracing our heritage, while envisioning a better future. Just as the old Dockyard site has been revitalised, we are breathing new life into our business - strengthening relationships with our core brands, supply chains, customers, government entities and stakeholders to create long-term value for generations to come.

## RESPONSIBILITY

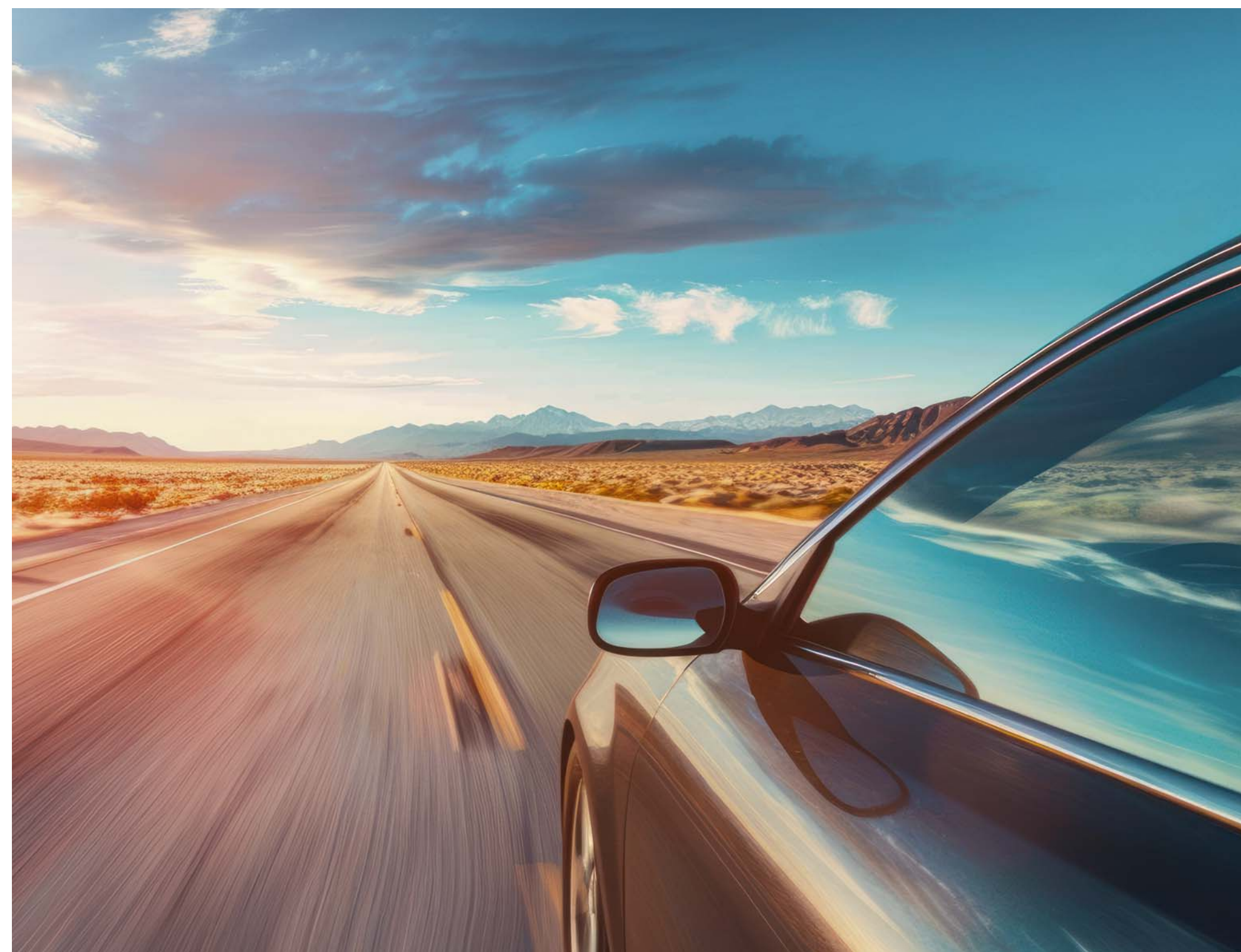
We are dedicated to understanding our impact on the planet and committed to minimising our environmental footprint. This commitment also encompasses governance, fiscal responsibility, and our obligation to employees, customers, and society. By fostering new collaborations within our Group and forming strategic partnerships externally, we aim to collaboratively address the most pressing challenges of our time.

The Group acknowledges its responsibility to contribute to the transition towards sustainable transport and mobility solutions. This document details the steps it has already taken on its journey towards sustainability, highlighting key developments and achievements, as well as presenting future goals.

Sustainability is not just the responsibility of a single department, group, or committee; it is a fundamental part of everyone's daily business activities. Our main goal is to integrate sustainability into our business plans, relationships, and overall performance throughout The Group.

We acknowledge that this vision will be challenging. With various trading

and operational entities spread across multiple countries, transitioning to a sustainable future demands significant time and resource investment, fostering a culture of innovation, and fundamentally rethinking our business practices. This strategy outlines the steps The Group will take to drive its transformation towards a more sustainable future.





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Chapter 2

# THE BASSADONE AUTOMOTIVE GROUP

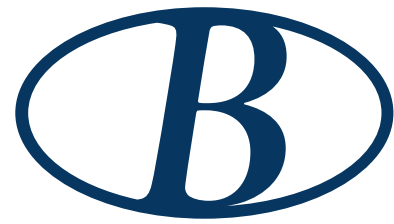
## C2.1 WHO WE ARE

The Group is a European multinational independent automotive company with headquarters in Gibraltar and operations in Finland, Estonia, Latvia, Lithuania, Spain and the UK.

Our comprehensive distribution and retail network provides specialised vehicles to government and non-government organisations worldwide, along with Original Equipment Manufacturer (OEM) brand retailing for Direct-to-Consumer (DTC) markets.







## C2.2 HERITAGE



The Group's origins date back to 1904, when the grandfather of George AC Bassadone O.B.E. G.M.H. (current President), began supplying groceries to British Forces stationed in Gibraltar. In 1927, the company expanded into vehicle

imports, introducing Peugeot to the local market. Over the decades, the business has grown steadily, guided by a commitment to quality, service and community, and expanded geographically.



Driven by business growth, The Group relocated its headquarters to Gibraltar's historic Dockyard in 2021, a site originally built as a naval yard in the early 20th century. The Group undertook a major refurbishment of the site, transforming it into a

state-of-the-art automotive facility while preserving its architectural heritage. This regeneration project is symbolic of The Group's approach to sustainability: honouring the past while building for the future.





# BASSADONE AUTOMOTIVE GROUP OVER THE YEARS

1904



Bassadone started trading as a grocer in Gibraltar.

1927



Bassadone imported cars to Gibraltar.

1979



Imported Toyota vehicles to Gibraltar.

1996



Toyota Gibraltar Stockholdings (TGS) was established.

2004



DAZ / Tomax launched.

2005



Bassadone Automotive Group (BAG) was formed.

2008



Bassadone Automotive Nordic (BAN) was launched.

2009



AADS was established.

2020



TGS achieves cumulative sales of 80,000 vehicles to 85 countries worldwide.

2020



AADS shipped 335 Gibraltar-built Jeep J8 Troop Carriers.

2020



Two new dealerships open in Tallinn, Estonia.

2019



Bassadone Automotive Group breaks ground on new headquarters.

2015



Innovative new "Web-Buy" website and dealership launched in Finland.

2014



BAN achieves cumulative sales of 100,000 vehicles in Finland and the Baltics.

2011



SsangYong Motors UK (now KGM) commences trading.

2010



TGS achieves cumulative sales of 20,000 vehicles.

2021



New dealerships opened in Turku, Finland and Riga, Latvia.

2021



Bassadone Automotive Group moves into new headquarters in Gibraltar.

2022



AADS secure 3rd time renewal of long term contract with US Government.

2022



TGS becomes an Authorised Specialised Distributor following the contract signing agreement with Toyota Tsusho Corporation.

2023



New dealerships in Tampere and Espoo, Finland.

2024



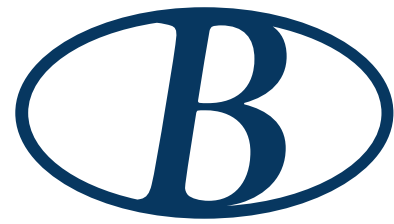
The retail operations in Finland and the Baltics have been rebranded as Auto Bassadone.

2024



SsangYong UK rebrands as KGM Motors UK and launches a new dealership.





# REGENERATING THE DOCKYARD SITE



Original building exterior repairs

Damages to the original exterior columns of the buildings were repaired.



Preserve the building's original exterior facade

Retained the original look of buildings by working closely with Gibraltar's Heritage Trust and architects. Installed modern facilities around key heritage features.



Restoring the building's original roof

The roofs original sheeting from the 1960's was restored. The rust was removed and the roof was repainted and more efficient insulation added whilst the industrial look was maintained.



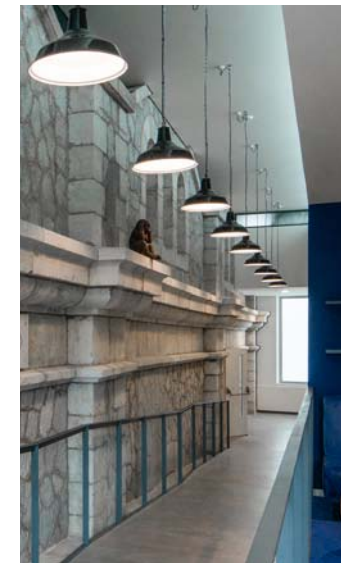
Restoring original staircases

All staircases were treated, sanded and painted to their original colour and key original features were retained.



5-tonne gantry crane

Building 83, now serving as a warehouse, retains its refurbished 5-tonne gantry crane, which has been repurposed to function as a passageway connecting to the new office building.



Lamps

Original lamps were restored and installed throughout the site.



Restoration of original windows

The original windows that were initially covered up were carefully restored with the advice of Gibraltar's Heritage Trust.



Original building sandblasting

The exterior and interior walls of the original buildings were sandblasted to show off the limestone structures.



Refurbished wooden blocks

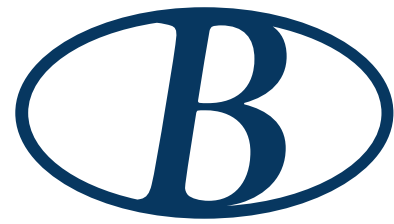
10,000 wooden blocks dating back to the late 1800's, were refurbished and repurposed.



New headquarters building

The original building was thoughtfully redesigned, incorporating the new structure alongside the original without causing any damage or altering its historic character.





C2.3

## PRESENT DAY

Annual turnover of  
**€1.4 billion**

Number of employees  
circa **1,000**

The Group delivered over  
**36,900**  
vehicles in 2024 to over 80 countries

C2.3.1

## KEY BUSINESS ENTITIES

The Group oversees a diverse portfolio of business entities, focusing on business areas such as:



### RETAIL

Auto Bassadone  
Bassadone Motors  
Tomax



### DISTRIBUTION

AADS  
Bassadone Automotive Nordic  
KGM Motors UK  
Toyota Gibraltar Stockholdings



### PROPERTY

Bassadone Industrial World Ltd





C2.3.2

## DISTRIBUTION AND RETAIL

Our business is structured around two core divisions:

### BASSADONE AUTOMOTIVE NORDIC (BAN)

BAN serves as our Northern European hub, covering Finland, Estonia, Latvia and Lithuania.

#### VEHICLE IMPORTATION

Our offices focus on developing business across Finland and the Baltics, where we distribute leading brands, including Alfa Romeo, Alpine, Citroën, Dacia, DS Automobiles, Fiat, Hyundai, Isuzu, Jeep, KGM, Nissan, Opel, Peugeot, Renault, and Suzuki. With over 600 employees, we have built a reputation as a trusted distributor of vehicles, spare parts and accessories, delivering around 25,000 new vehicles annually.

#### AUTO BASSADONE – VEHICLE RETAIL

Our retail division, formerly known as Autoverkkokauppa, was the first in Finland and among the first globally to offer a fully digital car-buying experience. In March 2024, it was rebranded as Auto Bassadone in both Finland and the Baltics, reinforcing our commitment to customer-centric and innovative retail solutions.







## BASSADONE AUTOMOTIVE SOUTH (BAS)

BAS encompasses several key business entities: Bassadone Motors (Gibraltar), Toyota Gibraltar Stockholdings (TGS), AADS, Automoción Tomax (Spain), and KGM Motors UK.

### BASSADONE MOTORS

Our flagship operation, representing 14 manufacturers, including Honda, Kia, Jeep, Fiat, Alfa Romeo, Suzuki and Isuzu. Supported by our in-house finance arm, Bassadone Automotive Finance (BAF), we are Gibraltar's largest automotive company.

### TOYOTA GIBRALTAR STOCKHOLDINGS

TGS will celebrate 30 years in 2026 as a global leader in customised Toyota vehicles for international aid organisations, NGOs and governments. Through our partnership with Toyota and a long-standing collaboration with the United Nations (UN), we supply vehicles to support emergency response operations in crisis-affected regions such as Rwanda, the Balkan War, Haiti, and areas impacted by Ebola.

### AUTOMOCIÓN TOMAX

Operating since 2004, this Toyota dealership serves customers in Spain, primarily in Algeciras and Estepona. It offers a range of vehicles and services tailored to local the markets.

### AADS

AADS delivers customised automotive solutions for government and defence organisations worldwide. Through strategic partnerships with Stellantis and Iveco Defence Vehicles, we provide tailored vehicles and comprehensive lifetime support for operations in over 30 countries. Our solutions support critical missions, including peacekeeping, border security, counter-narcotics, and anti-terrorism.

### KGM MOTORS UK

As the appointed UK importer and distributor for KGM (formerly SsangYong), the company is entrusted with overseeing the importation and nationwide distribution of the brand's vehicles, parts, and accessories, ensuring consistent market presence and operational excellence. It is working towards achieving a network of 75 retail partners, offering customers affordable SUVs and pick-up vehicles. Our focus includes new mobility solutions, such as EV platforms, AI-driven vehicle technologies and autonomous systems.

### OTHER

Beyond the automotive industry, The Group also owns and manages rental properties in Gibraltar through Bassadone Industrial World Limited, offering long-term commercial leasing solutions to external clients.







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Chapter 3

# A VISION FOR A SUSTAINABLE FUTURE







C3.1

## A CHANGING INDUSTRY

The Group recognises that the automotive industry is undergoing profound transformation. Early signals emerged in the mid-2010s as customer expectations evolved, social trust pressures intensified, and regulations affecting combustion engines accelerated.

Since the Paris Agreement, Net-Zero targets have reshaped requirements across the value chain. Companies are now expected to measure, manage, and report greenhouse-gas emissions—and to pursue net-zero across supply chains, operations, and investments.

Technology shifts are equally decisive. Electric vehicles (EVs) now account for around 10% of market share and continue to attract growing interest, influencing our products and sales. Hydrogen technologies are also gaining attention, with advances that could alter the economics and usability of future solutions.

Business models are changing in parallel. Mobility-as-a-Service (MaaS) prioritises access to mobility over vehicle ownership, creating new competitive dynamics and customer experiences.

Against this backdrop, the industry is evolving rapidly. The success of our current business models—and the viability of future opportunities—will be determined by how effectively we respond to these regulatory, technological, and commercial shifts. The Group is aligning its strategy accordingly, focusing on measurable emissions reductions, technology-ready portfolios, and customer-centric mobility services.



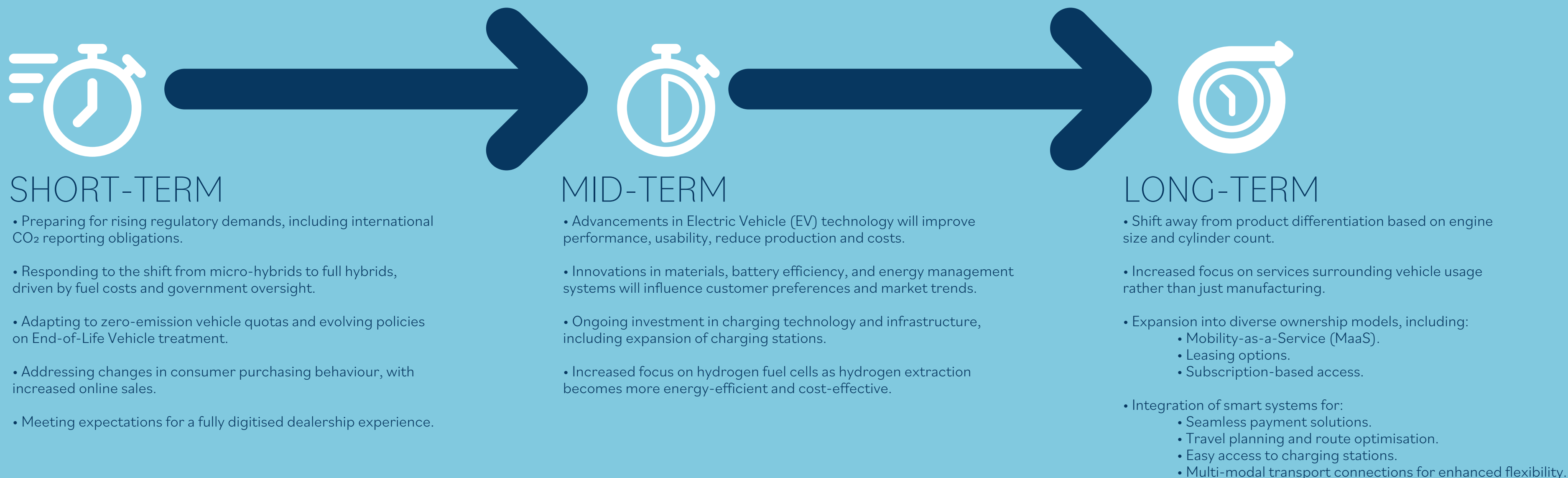




C3.2

## UNDERSTANDING THE FUTURE TRENDS

We actively strive to embrace innovation, regeneration and responsibility to ensure that The Group plays its part in the creation of a more sustainable future. The Group's strategic planning is informed by three distinct timeframes:



These sector trends shape our strategic priorities, guide our target setting, and influence the actions detailed in Chapter 4.





C3.3

## NAVIGATING THE TRANSITION: HOW OUR BUSINESS IS RESPONDING

Societies are undergoing a period of transition and expectations will continue to evolve in the years ahead. The Group recognises the need for products, supply chains and end-of-life solutions that align with the United Nations Sustainable Development Goals (SDGs) - particularly those addressing climate action, sustainable cities, responsible production, decent work and social, economic and environmental equality.

We must navigate these sector changes whilst ensuring that we continue to create economic value. At present, The Group, has responded to the sustainability agenda and driven forward the following innovations:

### EXTENDING OUR RANGE OF SUSTAINABLE PRODUCTS

Hybrid Electric Vehicle

**HEV**



Two engine types,  
electric and combustion.

Plug-In Hybrid Vehicle

**PHEV**



Same as the HEV but with  
greater capacity battery that can  
be recharged through plug-in.

Battery Electric Vehicle

**BEV**



Powered entirely by electricity  
stored in a rechargeable battery  
pack, which drives an electric motor.

Fuel Cell Electric Vehicle

**FCEV**

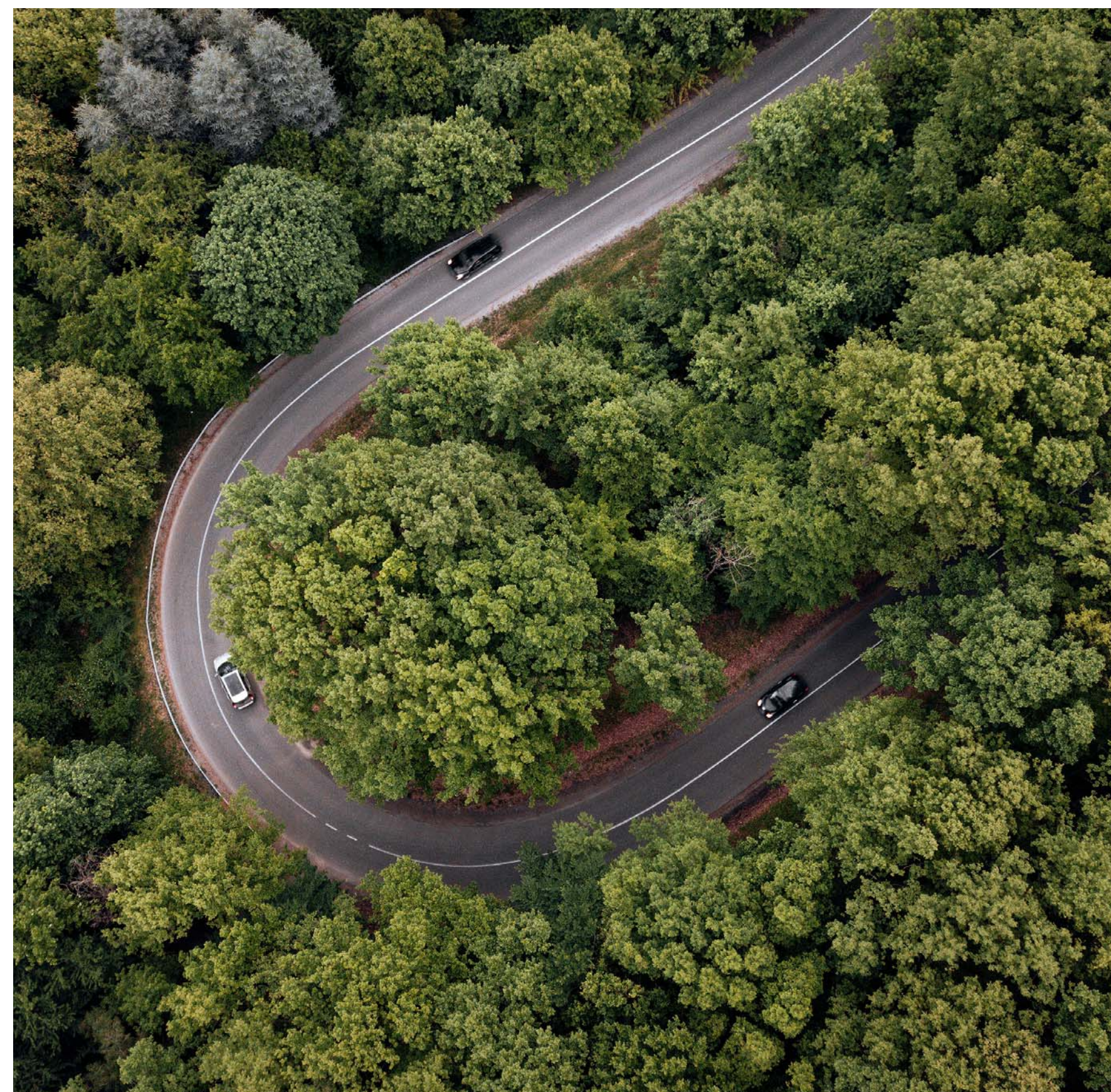


Hydrogen fuel cell  
powers the vehicle.

The Group's international electrification strategy builds on its groundbreaking success in Finland, a leader in sustainable automotive practices. In recent years, the Finnish market has rapidly shifted towards Battery Electric Vehicles (BEVs). In 2023, BEVs accounted for 30% of all registered vehicles in Finland, with The

Group and its brands contributing to more than 15% of these registrations. In line with our sustainability commitment, we prioritise BEVs for our company car fleet, leading by example and demonstrating the viability of clean energy solutions for everyday business use.

By diversifying our product offerings and championing electrification, The Group continues to play a pivotal role in advancing sustainable mobility solutions for a cleaner and more resilient future.







## ADDRESSING INFRASTRUCTURE REQUIREMENTS IN OUR DEALERSHIPS

We anticipate an increase in interest in vehicles adopting zero-emission technologies and, thus important for The Group's underlying infrastructure and mechanisms to consider factors related to these evolving trends and market readiness.

For example, in preparation for the shift towards electrification, we have developed a specific training programme for our sales team to help customers understand the benefits and how to use their EVs.

Our dealerships have also adapted their workshops to support full battery maintenance and repair, including work in high-voltage environments. We have also understood customer needs and sought to make electrified vehicles more accessible by offering highly competitive leasing solutions and committed resale

values, making BEVs more affordable. In Finland, Auto Bassadone has more than 100 charging stations available for customer use. By investing in charging infrastructure and providing customer incentives, we seek to drive the electrification of the Finnish and the Baltics markets and beyond.



## DIGITAL PLATFORMS

Over the past decade, The Group has strategically invested in building digital platforms and systems designed to adapt to evolving market dynamics while advancing its sustainability objectives. These platforms guide customers through every stage of the car-buying and ownership experience—offering access to a broad selection of new and pre-owned vehicles across multiple brands. With a strong focus on services that promote responsible consumption, the platforms empower users to make environmentally conscious choices throughout their journey.



### Automated Credit Decision Systems

An automated credit decision system that provides instant decisions to help finance the purchase while promoting options for financing electric and hybrid vehicles. This offers flexible payment options, including online payment or bank transfer, private leasing with monthly payments, and car financing that allows customers to determine the deposit and monthly payments according to their budget.



### Automated Trade-In Car Quote System

An automated trade-in car quote system that generates a binding offer and determines the final value based on the car selected for purchase. This system promotes responsible upcycling by giving trade-in vehicles a second life, helping reduce landfill waste and contributing to the circular economy. Additionally, by encouraging the transition to newer, more eco-friendly vehicles, the system supports the reduction of overall emissions.



### Automated Customer Tailored Purchasing Process

An automated customer tailored purchasing process that enables buyers to select the colour, add car accessories, choose extra services such as car insurance and tyre servicing, as well as select how they would prefer their car to be delivered.



### Online Tools

An online tool that supports efficient order processing, manual trade-in handling, and streamlined customer communication to minimise the environmental footprint of administrative operations.

**The Group has retained full ownership of the property rights of these adaptable digital platforms that are able to accommodate customer requirements and sustainability advancements in the automotive sector.**





## RESILIENT LOGISTICS AND SUPPLY CHAIN

Success in the automotive sector relies on strong international partnerships and the timely delivery of products from across the globe. The Group has overcome supply chain challenges by formalising partnerships with leading logistics companies, such as Maersk, which have digitised their systems to enable fast, efficient, shipping and tracking of goods. These systems lead to carbon-offsetting and energy-efficient transportation methods.

Our Nordic operations draw on decades of expertise to import over 25,000 vehicles annually from multiple manufacturers. These vehicles are delivered daily to our dealership network optimising logistics routes to minimise carbon emissions. All movements are tracked using advanced IT systems, while 600,000 spare parts references are managed with precision, ensuring a 95% first-fill rate for all the brands we represent. Our warehousing operations incorporate energy-efficient technologies to reduce energy consumption.

Meanwhile, our Gibraltar operations are strategically located near major shipping ports in southern Spain, providing a sustainable and efficient solution for importing 8,000 vehicles into Gibraltar each year.

Our facility stocks over 1,000 vehicles at any given time. After the necessary accessories are installed, these vehicles are exported to over 80 countries. Our logistics experts track 800 vehicles at any given time, providing customers with daily updates through an in-house developed online shipment tracking system.

To further support sustainability goals, we prioritise optimisation, energy-efficient warehousing operations, and sustainable packaging solutions for spare parts. Our warehouses hold approximately \$10 million worth of official Toyota and Mopar spare parts, which are ready for immediate delivery.

The Group continues to strengthen its partnerships with suppliers and/or external stakeholders to meet the demands.

## MOBILITY SOLUTIONS FOR A SUSTAINABLE FUTURE

The future of mobility extends beyond manufacturing. The Group is preparing for an industry shift by exploring innovative service-based options such as car-sharing, owning charging infrastructure and points, battery upgrades, fleet management, monthly leasing as well as subscription-based car services.

This diversification will require forming strategic partnerships with governments, financial institutions, and supply chains to bundle services and unlock new forms of value around products. These innovations aim to respond to evolving mobility trends, enhance user experiences, and reduce environmental impact.

All BAS internal fleet vehicles are electric and part of a shared pool system, available to all colleagues for business use. BAN has invested in EV infrastructure, including charging stations, to support this transition.







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Chapter 4

# BUILDING A COMMON FUTURE: PEOPLE ENGAGEMENT







C4.1

## COMING TOGETHER FOR SUSTAINABILITY

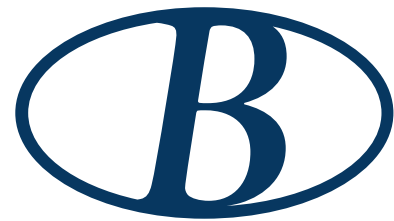
In today's automotive industry, meaningful stakeholder engagement is not just expected - it's essential.

The Group recognises that sustainability is not just a technical challenge to be solved through innovation and expertise; it requires collective action. Progress is only possible when employees, business partners, governments, communities and civil society work together to shape strategies that address infrastructure, consumer confidence and other critical business concerns. We recognise that by fostering open conversations and aligning diverse perspectives, we can build sustainability strategies that are more impactful.

Global frameworks like the United Nations Global Compact (UNGC), European Union's Corporate Sustainability Reporting Directive (CSRD) and the Voluntary Small and Medium-sized Enterprise Standard (VSME) reinforce the importance of stakeholder engagement as a fundamental driver of corporate sustainability. By embedding this principle into our strategy, we ensure this document is both forward-thinking and responsive to the needs of the communities we serve.







C4.2

# A SHARED VISION FOR SUSTAINABILITY

## INTERNAL ENGAGEMENT

Sustainability is a shared responsibility and across The Group, we are committed to ensuring that every part of the organisation contributes to its success.

Over the past 18 months, we have built a robust internal engagement framework designed to empower colleagues from central functions and trading entities to contribute to our sustainability journey. Regular briefing sessions, guidance documents and collaborative meetings have provided team members with opportunities to shape this strategy, reinforcing their role in achieving our sustainability ambitions.

Importantly, the process of defining these ambitions has been a milestone for The Group - marking the first time that all entities have come together to agree common goals and targets. This has not only strengthened alignment but has also fostered valuable connections among colleagues with similar responsibilities across different companies and geographies, creating greater coherence and collaboration across the organisation.

To assure our ongoing commitment to engagement, The Group has formalised new governance structures for sustainability across all levels of decision-making. Internal stakeholders will continue to play a key role in implementing this strategy through core function groups, departmental points of contact and senior leadership engagement (see Chapter 5).



## EXTERNAL ENGAGEMENT

Beyond our internal network, The Group is committed to meaningful engagement with external stakeholders.

We have a long-standing tradition of collaborating with communities, regional partners and industry leaders to remain relevant, responsive and actively contribute to improvements in quality of life. Our goal is to ensure sustainability efforts extend beyond our own operations and deliver tangible benefits for the wider community. This commitment has been reflected in our focus on community development, education and cultural enrichment through targeted programs. Our approach is centered on harnessing corporate resources, expertise and the dedication of our staff to make a meaningful impact.

Each year, BAS employees contribute to charitable organisations through financial donation, fundraising campaigns and volunteering. We provide every employee with a dedicated charity day - separate from their annual leave - to encourage participation in community service. Through initiatives like employee-led fundraising and corporate giving, we support a broad range of causes from social welfare and healthcare to environmental conservation and youth development.

The Group is also committed to empowering the next generation through education. Our Emerging Talent Scheme provides financial assistance and hands-on work experience to Gibraltar students pursuing higher education, equipping them with the skills needed for future success. Additionally, the George AC Bassadone Scholarship offers students from developing countries the opportunity to study Public Health at the London School of Hygiene and Tropical Medicine, helping them drive positive change in their communities.







C4.3

## STRENGTHENING EXTERNAL PARTNERSHIPS

In early 2025, The Group established external engagement groups to deepen engagement with key community stakeholders. These groups ensure that our sustainability strategy aligns with the needs and priorities of the people and organisations we serve.

Key community stakeholders included:



### Local residents

Individuals and families near our sites.



### Community leaders

Government officials, cultural figures and opinion leaders.



### Educational institutions

Schools, colleges and universities.



### Environmental organisations

NGOs and advocacy groups focused on sustainability.



### Business partners and associations

Key industry and regional voices engaged in sustainability.



### Regulatory bodies and authorities

Responsible for infrastructure, compliance and public-sector collaboration.

C4.4

## EXTENDING OUR IMPACT

These groups convened in May 2025 to assess The Group's sustainability strategy and identify opportunities to enhance our contributions. Their insights have shaped new project areas that align with our long-term vision and community impact goals.

Building on the discussions from our External Engagement Groups, The Group will expand its sustainability efforts during the lifetime of this strategy to include:



### EDUCATIONAL PARTNERSHIPS

Strengthening collaborations with universities and vocational institutions to promote STEM education, sustainability and workforce readiness.



### SUSTAINABLE MOBILITY INITIATIVES

Partnering with urban planners and local governments to support low-emission transportation solutions.



### ENVIRONMENTAL RESTORATION PROGRAMS

Expanding tree-planting, conservation and community clean-up initiatives in key regions.



### MENTAL HEALTH AND WELL-BEING


Supporting mental health awareness campaigns and employee well-being programs.

We remain committed to driving sustainable progress through meaningful engagement and collaboration, and will continue to seek stakeholder insights as the strategy is implemented.





The table below summarises the projects developed with BAS stakeholders. These new initiatives reflect our belief that sustainability also involves building strong and more resilient communities.

INITIATIVE						
	STEM Education and Workforce Readiness	Electric Futures	Strive for Green	Mindful Mobility	Built Environment and Heritage Preservation	Community Support for the Less Privileged
OBJECTIVE	Equip students with STEM and sustainability skills for the future mobility sector.	Drive EV adoption by understanding and addressing public perceptions.	Support environmental conservation across Gibraltar and the region.	Promote mental health and well-being within the workforce.	Ensure sustainable construction while preserving heritage.	Assist vulnerable individuals through partnerships and employee action.
KEY ACTIONS	<ul style="list-style-type: none"><li>• STEM workshops in EVs and tech.</li><li>• Internships and apprenticeships.</li><li>• EV innovation challenges.</li><li>• Scholarships and career pathways.</li></ul>	<ul style="list-style-type: none"><li>• Community-wide EV perception survey.</li><li>• Public education and myth-busting.</li><li>• Data-informed strategy and planning.</li><li>• Policy advocacy for EV incentives.</li></ul>	<ul style="list-style-type: none"><li>• Native habitat restoration.</li><li>• Coastal and urban clean-ups with employees and partners.</li></ul>	<ul style="list-style-type: none"><li>• Mental health awareness campaigns.</li><li>• Mindfulness and fitness programmes.</li><li>• Peer support networks.</li></ul>	<ul style="list-style-type: none"><li>• Dialogue with contractors and Gibraltar Heritage Trust.</li><li>• Use of eco-friendly building materials.</li><li>• Long-term site maintenance planning.</li></ul>	<ul style="list-style-type: none"><li>• Employee involvement in soup kitchens.</li><li>• Seasonal donation drives.</li><li>• Partnerships with local charities and businesses.</li></ul>
IMPACT	<ul style="list-style-type: none"><li>• Builds skilled green workforce.</li><li>• Strengthens education–industry links.</li><li>• Advances low-emission goals.</li></ul>	<ul style="list-style-type: none"><li>• Informs sustainable transport policy.</li><li>• Encourages community EV uptake.</li><li>• Supports low-emission urban mobility.</li></ul>	<ul style="list-style-type: none"><li>• Enhances biodiversity.</li><li>• Fosters cross-border environmental stewardship.</li><li>• Engages staff in conservation.</li></ul>	<ul style="list-style-type: none"><li>• Builds a resilient, healthy workforce.</li><li>• Reduces stress and boosts morale.</li><li>• Cultivates inclusive workplace culture.</li></ul>	<ul style="list-style-type: none"><li>• Improves infrastructure quality.</li><li>• Minimises environmental footprint.</li><li>• Preserves cultural and historical assets.</li></ul>	<ul style="list-style-type: none"><li>• Enhances local quality of life.</li><li>• Builds stronger community ties.</li><li>• Promotes a culture of compassion.</li></ul>





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Chapter 5

# GOVERNANCE STRUCTURES







C5.1

# SUSTAINABILITY GOVERNANCE STRUCTURES

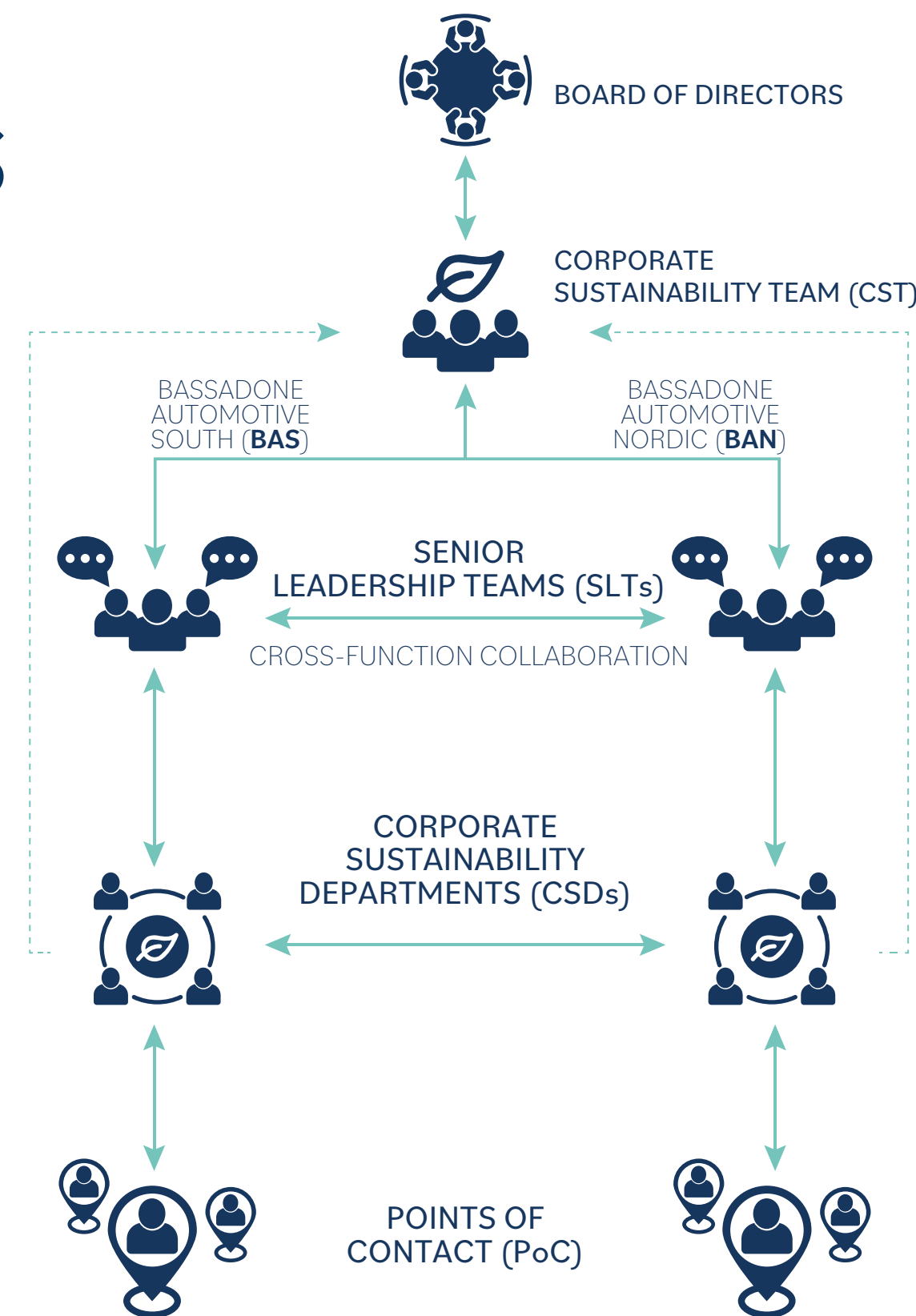
The successful execution of our sustainability strategy across the different aspects of our business hinges on a clearly defined and effective governance structure. This structure is primarily concerned with identifying who is responsible for business strategy, technical policy setting, organisational development and implementation, as well as people engagement and corporate reporting.

We recognise that governance is as much about understanding roles and responsibilities as it is about processes and relationships. We also acknowledge that different aspects of our business will have a different set of priorities for sustainability. Nevertheless, there is unity in purpose and a common direction as set out in this document.

## SUSTAINABILITY GOVERNANCE

The framework sets out the governance structure and sustainability responsibilities across the organisation, connecting the two divisions.

The new governance arrangements, established in support of the new sustainability strategy, were defined following a process of consultation. They consist of:



The Board of Directors considers how sustainability influences the future of the business, confirms the business aspirations, assesses risks and monitors progress.

The Corporate Sustainability Team (CST) provides the leadership for sustainability, translates The Group's vision and aspirations into coherent and actionable pathways.

The Cross-Function Collaboration is a vital part of the sustainability governance in action. This takes place at the Senior Leadership Teams (SLTs) meetings where all functional heads of the organisation come together to drive forward the strategic aims of the organisations within their areas of responsibility. Sustainability is one of these strategic aims.

The Corporate Sustainability Departments (CSDs) develop culture, capacity and collective understanding of sustainability. They play a vital role in embedding sustainability into the DNA of the organisation and tracking the impact of these actions both internally and externally. They help join the dots across the functions and departments that operate within their region.

The Points of Contact (PoC) identified across the numerous departments will bring the strategy into practice across every aspect of the business.





## BOARD OF DIRECTORS

### Responsibilities

- Confirms strategic business decisions for the organisation understanding the impact these have on sustainability.
- Agrees strategic business opportunities in support of sustainability.
- Oversees and approves the sustainability strategy, plans, performance and reporting. Evaluates and ratifies material sustainability-related risks and opportunities.
- Identifies a Board Champion that is in more regular contact with the Director and staff of the CSDs.

### Governance in Action

- Sustainability is a standing agenda item for Board meetings where the sustainability implications of all Board agenda items are discussed.
- CST reports progress against the strategy at Board meetings and raises core issues and considerations.



## CORPORATE SUSTAINABILITY TEAM

### Responsibilities

- Provides leadership for sustainability across The Group.
- Translates strategy into tactical pathways for The Group.
- Identifies synergies and addresses risks across The Group.
- Monitors and reports progress against the strategy for The Group.

### Governance in Action

- Chaired by the Board Champion.
- Brings together progress reports from Bassadone Automotive South (BAS) and Bassadone Automotive Nordic (BAN).
- Reports on these on a quarterly basis to the Board of Directors.
- Oversees the work of the CSDs.



## CORPORATE SUSTAINABILITY DEPARTMENTS

### Responsibilities

- Develops a culture, capacity and collective understanding of what is seeking to be achieved. Establishes plans of action to implement the Sustainability Strategy.
- Liaises with directors, managers and teams to understand issues and progress actions. Identifies opportunities and anticipates risks and challenges.
- Collects data for assessments and reporting.
- Collaborates with *People* in creating opportunities for people engagement in sustainability and embedding learning through doing across the organisation.
- Collaborates with *Health, Safety, and Environment* to provide technical insights as well as manage corporate reporting for environmental parameters, carbon emissions, and health and safety.
- Collaborates with *IT* in setting up data capture, information and performance management systems to assist with monitoring and reporting.
- Collaborates with *Finance* on the CSRD and relationship management with auditors including assurance frameworks and verification processes.
- Collaborates with *Marketing, Communications and PR* ensuring all internal colleagues understand sustainability, the strategy and implementation progress and the role of the unit.
- Collaborates with *Marketing, Communication and PR* in relation to sustainability branding and reputation.
- Collaborates with *Trading Entities* to ensure client expectations inform sustainability policies and practices and that client procurement requirements in sustainability are met.

### Governance in Action

There is a CSD for BAS and another for BAN. Both:

- report to the CST on a monthly basis and to the Board of Directors on a quarterly basis through the CST;
- acts as a secretariat to the the Board Champion and CST; and,
- coordinates the work of the Points of Contact for their region.



## SENIOR LEADERSHIP TEAMS

### Responsibilities

The Senior Leadership Teams meets regularly and will consider sustainability concerns at scheduled meetings. The CST will table agenda items and actions to the team.

- Feeds into the strategic process identifying synergies and risks within and across functions.
- Retains an overview of the sustainability work relevant to their function.
- Monitors and reports progress for their function against the strategy.

### Governance in Action

- The SLTs meets once a quarter.
- Senior leaders inform their teams of the SLT's agenda and outcomes.



## POINTS OF CONTACT

### Responsibilities

- Assist with collecting information and data relating to their function area or business.
- Assist with identifying issues and risks as they related to their function areas or businesses.
- Assist with engagement plans and actions as they relate to their function areas or businesses.
- Assist with communicating sustainability across the organisation.

### Governance in Action

- Points of Contact meet regularly with CSDs representative for their geographical unit.





C5.2

## MITIGATING RISK

This comprehensive governance framework enables the effective integration of sustainability risks and trends into our business strategy and decision-making processes. It recognises that sustainability can take a different form across the diversity of companies that comprise The Group.

The overarching corporate governance risk is addressed by:

### THE BOARD OF DIRECTORS

Confirms the strategic, financial, legal and compliance risks of the business.

### THE CORPORATE SUSTAINABILITY TEAM (CST)

Identifies the nature and level of risk, in line with strategic objectives and to achieve medium to long-term sustainability. It also takes responsibility for operational, planning and reporting risks as well as climate-related disclosure risks.

### THE SENIOR LEADERSHIP TEAMS (SLTs)

Responsible for identifying and assessing the risks associated with their business functions and responsibilities; and,

### THE CORPORATE SUSTAINABILITY DEPARTMENTS (CSDs)

Ensures that each risk is correctly identified and monitored in the company's management and operational activities.

Building on the identification of sustainability governance responsibilities, sustainability is now explicitly reflected in the Board's risk register and embedded within financial plans and reporting frameworks.







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Chapter 6

# AMBITIONS AND ACTIONS FOR A SUSTAINABLE FUTURE







C6.1

## UNDERSTANDING VALUE AND IMPACT

Effectively setting ambitions and defining strategic actions requires a robust understanding of the external economic environment, evolving industry trajectories and shifting societal expectations. Equally critical is a clear assessment of the value and impact of our own operations.

To consolidate this understanding, The Group undertook a comprehensive Double Materiality Assessment (DMA), supported by an external specialist consultant. This process enabled us to rigorously analyse both:

### OUTSIDE-IN IMPACTS

How sustainability challenges and trends affect our business operations, risk profile and future growth.

### INSIDE-OUT IMPACTS

How our activities and decisions influence society, the environment and broader economic systems.

The SLTs led this strategic exercise, ensuring representation and input from all business entities and functional areas across The Group. The insights from this process have shaped the foundations of our five-year sustainability strategy, helping us prioritise where we can create the most value and where our impact is most significant, both positively and negatively.

This dual perspective has enabled us to identify what our strategic priorities should be over the next five years. The key findings from the DMA are summarised:

## TOP FIVE STRATEGIC BUSINESS OPPORTUNITIES

1

OPPORTUNITY

Unlocking inter-company Synergies & Workforce Resilience

OBJECTIVE

**Enhancing cross-entity collaboration, knowledge-sharing and employee development to build a more agile, skilled and future-ready workforce.**

2

OPPORTUNITY

New Markets & Products

OBJECTIVE

**Entering emerging markets and diversifying offerings to meet global demand for sustainable mobility and transport solutions.**

3

OPPORTUNITY

Integration of AI into Business DNA

OBJECTIVE

**Leveraging artificial intelligence to optimise operations, customer engagement and predictive analytics across our value chain.**

4

OPPORTUNITY

Advancement in EV Technologies

OBJECTIVE

**Capitalising on the shift to electric vehicles (EVs), sustainable fuels and mobility innovation to future-proof The Group's product portfolio.**

5

OPPORTUNITY

Diversification into New Business Sectors

OBJECTIVE

**Exploring adjacent industries and untapped opportunities that align with our competencies and sustainability goals.**





## TOP FIVE STRATEGIC BUSINESS **RISKS**

1	RISK	Supplier Dependency & Contract Vulnerability
	STRATEGIC CONCERN	Potential disruption due to overreliance on key suppliers or non-renewal of critical distribution agreements.
2	RISK	Macro Political Challenges
	STRATEGIC CONCERN	Regulatory and geopolitical uncertainties, particularly post-Brexit and in relation to Gibraltar-Spain relations, pose operational risks.
3	RISK	Global Political & Economic Volatility
	STRATEGIC CONCERN	Shifts in funding, market focus, or economic stability could disrupt access to key markets and alter customer demand.
4	RISK	Changing Public Sentiment on ICE Vehicles
	STRATEGIC CONCERN	Rapid shifts in consumer attitudes towards internal combustion engines and the adoption curve for EVs could impact brand relevance.
5	RISK	Financial Impact from Market Disruption
	STRATEGIC CONCERN	Risks to cash flow, cost structures and profitability resulting from external shocks or structural transformation in the industry.

## FIVE MOST SIGNIFICANT **IMPACTS** OF THE GROUP ON ENVIRONMENT AND SOCIETY

1	IMPACT AREA	Community Presence & Local Influence
	NATURE OF IMPACT	The Group is one of Gibraltar's largest employers, our operations have a broad socio-economic footprint; both positive and potentially disruptive.
2	IMPACT AREA	Waste Management & End-of-Life Vehicle Treatment
	NATURE OF IMPACT	Environmental responsibilities across the vehicle lifecycle, including sustainable disposal and supply chain accountability.
3	IMPACT AREA	Positive Export Impact
	NATURE OF IMPACT	Many of our vehicles support humanitarian and development missions globally, contributing to mobility and access in underserved regions.
4	IMPACT AREA	Emissions from Vehicles in Use
	NATURE OF IMPACT	Ongoing environmental impact from vehicles sold, highlighting the need for accelerated transition to cleaner technologies.
5	IMPACT AREA	Education, Training & Community Investment
	NATURE OF IMPACT	Our initiatives contribute to people-related development, skills-building and social uplift.

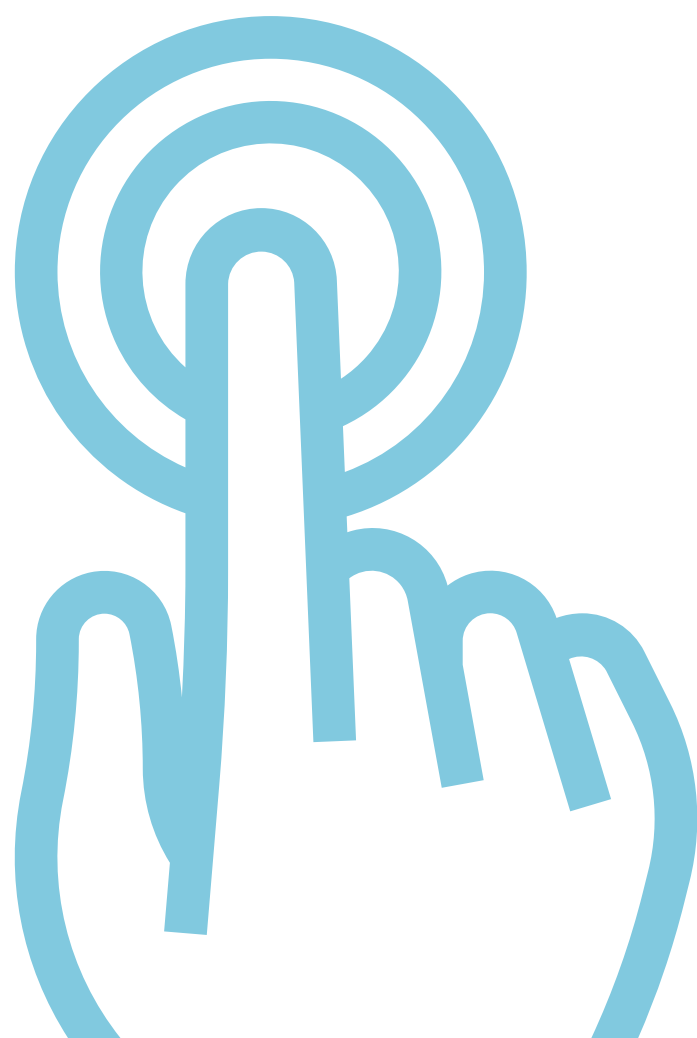




C6.2

# OUR BUSINESS PRIORITY ACTIONS FOR SUSTAINABILITY 2025-30

The findings of the Double Materiality Assessment (DMA) directly shaped our strategic priorities and performance targets for the next five years. Each business entity conducted a review of the assessment results, enabling teams to define Business Priority Actions (BPAs) and ensure their alignment with sustainability over the same period.



## BPA 1 LEAD THE TRANSITION TO LOW-EMISSION FLEETS

**To accelerate the shift to sustainable mobility by transforming our product portfolio.**

This will help to capitalise on the DMA-identified opportunity of advancement in EV technologies and expand into new markets and products. It will strengthen resilience against the risk of changing public sentiment on ICE vehicles and ensuring our offerings meet evolving environmental requirements.

### KEY ACTIONS

#### PUBLIC SECTOR ENGAGEMENT

Promote hybrid and EV adoption through collaboration with key stakeholders, encouraging fleet transitions to low-emission vehicles.

#### FLEET EFFICIENCY THROUGH ENGINE UPGRADE

Encourage clients to adopt cleaner, more efficient engine technologies to reduce fuel consumption and greenhouse gas emissions, thereby lowering operating costs and supporting decarbonisation.

#### ACCESSIBLE GREEN MOBILITY

Encourage flexible leasing to broaden access to the latest eco-friendly technologies.

#### RESPONSIBLE SUPPLY CHAIN

Work closely with suppliers to secure consistent hybrid and EV engine supply reinforcing responsible supplier relationships.

#### PRODUCT TRANSITION

Phase out petrol-only models from the product range, aligning with emissions legislation.

#### INTERNAL ADVOCACY

Lead by example internally by promoting and supporting EVs as company cars across The Group, demonstrating commitment and building local influence.

### EXPECTED OUTCOMES

- Enhanced brand leadership in sustainable mobility.
- Reduced lifecycle emissions from vehicles sold, addressing the material impact of pollution.
- Stronger customer engagement driven by a proactive alignment with sustainability.
- A predominantly EV company car fleet, signalling leadership in sustainable mobility.
- Strengthened resilience against reputational and market risks.



## BPA 2

### DIGITALLY ENABLE LOW-CARBON

**Embed AI-powered digital tools across the value chain, from customer engagement to supply chain and franchise operations to reduce environmental impact and enhance operational efficiency.**

This objective directly supports the DMA-identified opportunities of the integration of AI into business DNA, while building workforce resilience and climate change mitigation. The Group leverages AI through its in-house IT Development Team, which designs AI software running on internal data facilities powered by renewable energy, underscoring our commitment to sustainable innovation. Thus BPA 2 and BPA 4 are closely linked as clean energy is used to power these digital tools.

#### KEY ACTIONS

##### PROCESS OPTIMISATION

Launch integrated digital platforms to optimise customer service, procurement, marketing and internal workflows.

##### EFFICIENCY

Deploy AI-driven inventory and tender management tools to reduce overproduction, excess stock and material waste.

##### RESOURCE REDUCTION

Introduce suitable systems to modernise customer interactions, reduce paper use and improve service efficiency.

##### LOW CARBON

Promote video conferencing and hybrid collaboration tools to cut emissions from business travel and foster cross-entity collaboration.

##### DIGITAL SKILLS AND FUTURE READINESS

Deliver targeted digital skills training to staff and franchise partners, embedding a culture of innovation and sustainability and ensuring readiness to adopt new AI tools building a more agile, future-ready workforce.

#### EXPECTED OUTCOMES

- Lower carbon emissions from reduced travel and smarter logistics.
- Minimised material waste and improved energy efficiency across operations.
- Enhanced digital customer journeys and digital fluency across teams.
- Greater operational resilience and cost efficiency through predictive, AI-enabled decision-making.
- Strengthened corporate culture that embraces data-driven sustainability.





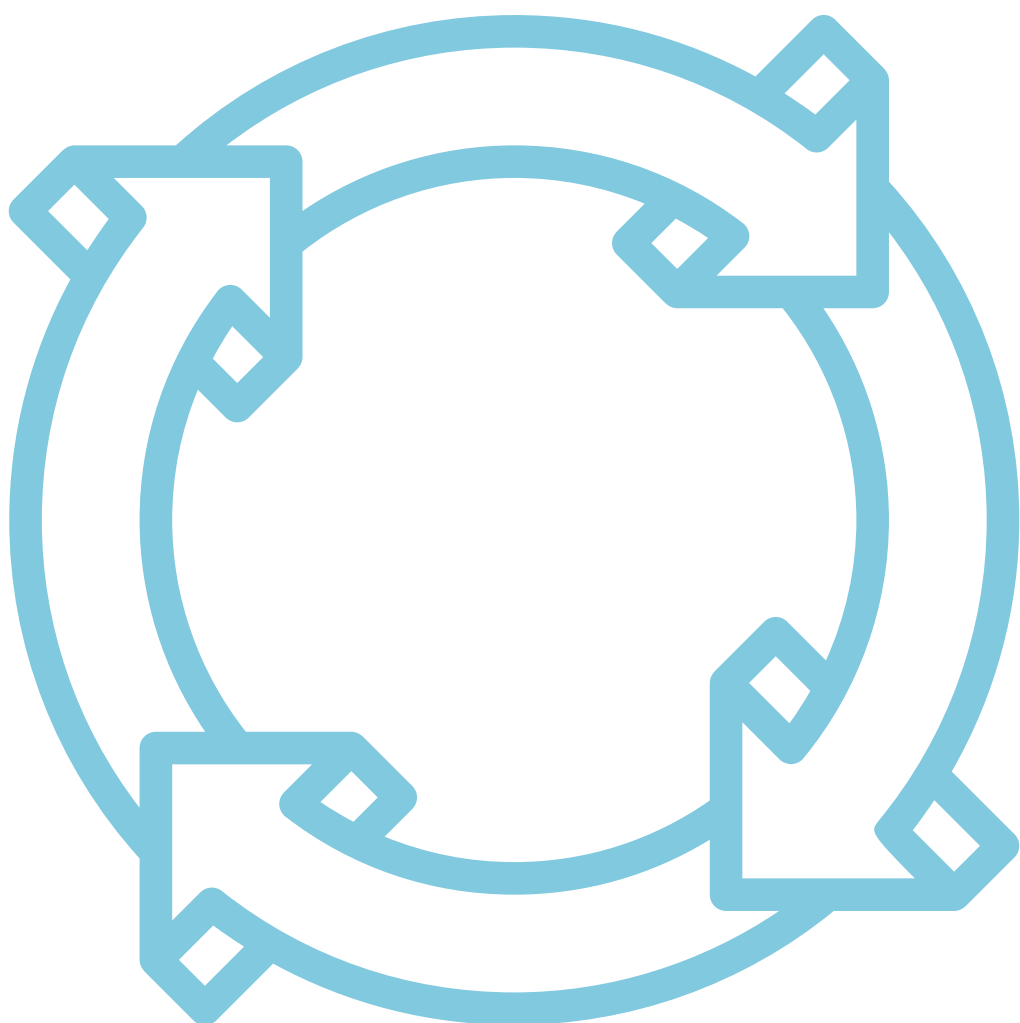


## BPA 3

# ADVANCE CIRCULARITY THROUGH SUSTAINABLE VEHICLE LIFECYCLE MANAGEMENT

**Support the circular economy and future-proof The Group by reducing reliance on virgin components, promoting responsible End-of-Life Vehicle (ELV) practices and embedding sustainability across the supply chain.**

This directly contributes to: unlocking new markets and products, diversification into new business sectors (e.g. refurbishment, recycling); advancement in EV technologies; and, unlocking inter-company synergies and workforce resilience. It also addresses supplier dependency and contract vulnerability as well as environmental and societal impacts including: waste management and ELV treatment; and, emissions from vehicles in use.



### KEY ACTIONS

#### CIRCULAR SOURCING AND LIFECYCLE EXTENSION

Collaborate with manufacturers and suppliers to increase the uptake of reconditioned and remanufactured parts, reducing reliance on virgin materials. Assess and recondition aged vehicles and components onsite to extend operational life, reduce waste and deliver cost savings - advancing circular economy principles across the value chain.

#### RESPONSIBLE REUSE AND END-OF-LIFE MANAGEMENT

Strengthen relationships with OEMs and global fleet partners to support second-life use, responsible resale and sustainable vehicle decommissioning. Advocate for circular models that go beyond first ownership and encourage recycling best practices.

#### CUSTOMER-FACING ELV PROGRAMMES

Launch customer-focused initiatives for responsible ELV return, trade-in and recycling. Facilitate faster fleet turnover into cleaner, low-emission and electric alternatives by incentivising sustainable vehicle disposal.

#### INTERNAL CAPACITY BUILDING

Enable internal teams and franchise networks to adopt circular practices through targeted training, knowledge sharing and process integration.

#### SUSTAINABLE PROCUREMENT

Embed circular economy principles in procurement by prioritising suppliers and contractors with verified sustainability credentials, robust environmental performance and responsible material sourcing.

#### PUBLIC AWARENESS AND CUSTOMER ENGAGEMENT

Organise marketing campaigns to promote responsible consumption, safe and low-emission vehicles and address the issues of new versus very old vehicles.

#### LOCAL WORKFORCE DEVELOPMENT “TRAIN THE TRAINER”

Establish training programs for local mechanics and service personnel on ELV, transferring technical expertise, improving workplace standards and promoting equitable access to skilled jobs, with a focus on sustainable practices.

### EXPECTED OUTCOMES

- Reduced demand for new components and emissions from new part production.
- Higher ELV recycling rates and greater customer participation in trade-in and take-back schemes.
- Stronger alignment across the supply chain with circular and sustainability standards.
- Workforce more skilled in circularity and sustainability practices, supporting resilience.
- Expansion into adjacent circular business models (e.g. parts refurbishment, recycling services).
- Lower carbon footprint from trainer travel and optimised global logistics.



## BPA 4

# DECARBONISE FACILITIES AND LOGISTICS THROUGH CLEAN ENERGY AND RESOURCE EFFICIENCY

**Reduce operational emissions and environmental impact by electrifying warehouse and facilities equipment, conserving water and energy and transitioning to renewable power sources.**

This directly supports our competitiveness in new markets and products as clients are expecting us to practice sustainability internally. It also builds workforce resilience through training in sustainable operations and aligns with the growing need to address emissions from vehicles in use and operational activities.

### KEY ACTIONS

#### FLEET DECARBONISATION

Transition all warehouse forklifts and select facility vehicles to electric alternatives to significantly cut operational emissions and position The Group as a leader in low-carbon fleet management.

#### REDUCING TRAVEL EMISSIONS

Reduce emissions from staff travel by consolidating in-person training sessions, streamlining trainer itineraries and prioritising virtual delivery where possible, lowering carbon output and reducing employee fatigue.

#### ENERGY SMART

Complete rollout of energy-efficient LED lighting and smart building systems to optimise energy use and reduce cost exposure.

#### RENEWABLE ENERGY

Deploy solar panels in partnership with certified renewable energy providers, increasing use of renewables, reducing dependency on volatile fossil fuel markets and strengthening resilience against global volatility.

#### CLEAN ENERGY SOLUTIONS

Introduce solar-powered products for vehicle accessories and off-grid applications, enhancing energy independence and cutting carbon reliance.

#### POLLUTION AND RESOURCE REDUCTION

Use biodegradable cleaning agents and install water-saving equipment, improving working conditions and reducing the environmental footprint.

#### SMART LOGISTICS

Create warehousing hubs near primary suppliers to reduce shipping distances, streamline inventory flow, lower emissions and improve supply chain resilience.

#### GREENER SUBCONTRACTING PRACTICES

Collaborate closely with subcontractors to embed greener working practices and minimise Scope 3\* emissions.

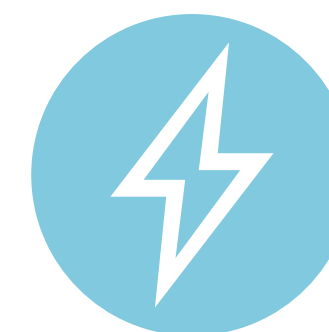
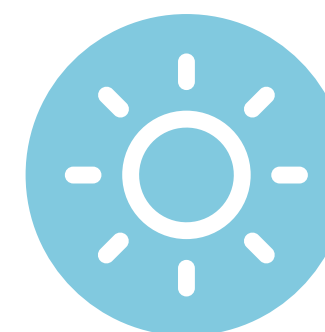
#### LOW IMPACT INNOVATION AND PROTOTYPING

Pilot and refine vehicle components through small batch prototyping to reducing design flaws and material waste, shorten production cycles and supporting energy and resource efficiency.

#### REGIONAL/LOCAL ASSEMBLY PARTNERSHIPS

Partner with clients and build their technical capability so that they can assemble vehicles locally using shipped parts and manuals. This will reduce emissions from centralised assembly and increase operational agility.

\*Scope 3 refers to indirect greenhouse gas emissions that occur in a company's value chain, like those from suppliers, product use, or employee travel.



### EXPECTED OUTCOMES

- Lower direct and indirect emissions from facilities, warehousing and logistics.
- Reduced water consumption and enhanced compliance with conservation and environmental standards.
- Increased share of renewable energy in total operational energy use, supporting climate change mitigation.
- Enhanced local technical capacity and equal access to skilled employment.
- Improved product quality and continuous resource efficiency through prototyping.
- More agile, resilient logistics networks with reduced cost and risk.
- Increased clean energy use and innovation in distribution processes.







C6.3

## SUSTAINABILITY TARGETS FOR 2025-30

The insights derived from the Double Materiality Assessment (DMA) have also provided the evidence base for shaping our performance targets for the coming five years. Grounded in a commitment to responsible innovation and long-term resilience, these targets reflect our ambition to create shared value for business, society and the environment. The targets can be found in the Appendix section. We provide an overview and how the targets align with the key outcomes of the DMA and The Group's strategic ambitions.



C6.3.1

## FACILITIES



The targets identified for the Facilities Department represent the operational core of our sustainability and climate resilience agenda. Focused on emissions reduction, energy transition and resource circularity, these measures are designed not only to protect The Group's operational continuity but also to foster a culture of environmental stewardship and innovation.

### ALIGNMENT WITH BUSINESS OPPORTUNITIES

Targets such as carbon neutrality by 2035 (FAC3), securing full renewable energy sourcing (FAC5) and transitioning to a fully electric internal fleet (FAC6) directly align with opportunities in new mobility markets, EV technologies and operational innovation (Opportunities 2, 4 and 5). Initiatives to integrate energy-efficient systems and smart infrastructure reinforce The Group's digital transformation journey, enabling enhanced monitoring, optimisation, (Opportunity 3). Additionally, efforts to improve indoor environmental quality and expand green spaces (FAC16) contribute to workforce well-being and resilience (Opportunity 1).

### ALIGNMENT WITH BUSINESS RISKS

Facilities actions also mitigate key risks from energy costs and price volatility and environmental regulation breaches to climate-induced disruption (Risk 3 and 5). This is done through proactive measures like climate risk assessment (FAC13), controlled emissions (FAC12) and contingency planning (FAC14). At the same time, integrating ethical procurement practices and verified sustainability certifications (FAC18, FAC19) enhances supply chain resilience and safeguards reputational integrity (Risk 1).

### ALIGNMENT WITH IMPACTS ON ENVIRONMENT AND SOCIETY

Beyond environmental impact, these targets reinforce The Group's social licence to operate. Measures to enhance indoor air quality, biodiversity (FAC16, FAC17) and health and safety (FAC15) demonstrate a commitment to employee well-being and community value (Impact 1). Procurement, reporting, training and certification targets (FAC18-FAC22) establish integrity, transparency and alignment with international standards such as CSRD.

Refer to the Appendix for a full list of sustainability targets for 2025-2030.



C6.3.2

## HEALTH AND SAFETY



Across The Group, Health and Safety (HS) Teams address sustainability through mitigating risks, promoting healthy and safe practices and ensuring transparency. Its goal is to achieve a zero-accident workplace through comprehensive risk assessments, training and safety culture initiatives. Alongside this there is a commitment to promote occupational health and well-being as well as fresh efforts to support the reporting of HS performance and preventive measures.

### ALIGNMENT WITH BUSINESS OPPORTUNITIES

Commitments to 100% incident reporting (HS1) and a 10% annual reduction in workplace incidents (HS2) foster a safe, learning-oriented environment that supports workforce resilience (Opportunity 1). Digitalisation of HS systems (HS13) and transparent reporting (HS17) contribute to The Group's broader integration of AI and data-led governance (Opportunity 3).

### ALIGNMENT WITH BUSINESS RISKS

Improved safety reporting (HS1), incident reduction (HS2) and robust emergency protocols (HS3) mitigate potential liabilities and help avoid business disruption. Sustainable and ethically sourced safety equipment (HS5) reduces exposure to harm, while targeted action on emissions and chemicals (HS8, HS12) ensures readiness for tightening environmental regulations.

### ALIGNMENT WITH IMPACTS ON ENVIRONMENT AND SOCIETY

Targets for workforce training associated well-being and mental health (HS7) align with The Group's role as a major local employer (Impact 1 and 5). Measures to reduce hazardous materials (HS12), increase circularity (HS9) and lower emissions (HS8) contribute to better waste and lifecycle outcomes (Impact 2). Community engagement (HS15) and a comprehensive HS Sustainability Policy (HS18) institutionalise shared value creation and reinforce The Group's social licence to operate (Impact 1 and 5).

Refer to the Appendix for a full list of sustainability targets for 2025–2030.

C6.3.3

## MARKETING



Marketing has the potential to amplify sustainability values, shaping consumer perception, supporting green market growth and reinforcing The Group's reputation. It also has the responsibility to ensure accurate, transparent and consistent communication of The Group's sustainability practices and impacts. When aligned with sustainability, marketing becomes a catalyst for purpose-led growth: embedding sustainability into voice, vision and value creation.

### ALIGNMENT WITH BUSINESS OPPORTUNITIES

Marketing acts as a lever for innovation and brand credibility. Moving 80% of materials to sustainable formats (M1) and transitioning to a green supplier base (M2) support climate-aligned goals. Annual sustainability campaigns (M3) and applying a sustainability lens to all communications (M4) build The Group's identity as a values-led brand (Opportunity 2). Ethical marketing practices (M5) and data-driven impact tracking (M6) embed AI and build trust (Opportunity 3). Promoting sustainable products (M8) supports EV and low-emission solutions, while empowering staff creativity and engagement (Opportunity 1 and 4).

### ALIGNMENT WITH BUSINESS RISKS

Sustainability-led marketing reduces reputational and compliance risk (Risk 4). Embedding it in partnerships (M9) and a formal policy (M10) ensures consistency and resilience. Commitment to carbon-neutral campaigns by 2030 (M11) protects brand integrity and future-proofs operations. Ethical supplier and content choices also reduce exposure to high-risk factors.

### ALIGNMENT WITH IMPACTS ON ENVIRONMENT AND SOCIETY

100% staff sustainability training (M12) builds internal capability and amplifies sustainability influence (Impact 5). Campaign accountability and outcome tracking (M13) improve transparency and align with CSRD and global frameworks, while shifting public attitudes on sustainable mobility (Impact 1).

Refer to the Appendix for a full list of sustainability targets for 2025–2030.





## C6.3.4 PEOPLE



People targets are central to The Group's commitment to ethical governance, inclusive workplace culture and long-term workforce resilience. The targets focus on human rights, mental health, professional growth and future workforce readiness, reinforcing The Group's role as a purpose-led employer.

### ALIGNMENT WITH BUSINESS OPPORTUNITIES

People targets enable The Group to strengthen inter-company synergies, unlock workforce resilience and attract mission-aligned talent (Opportunity 1). Safeguards against human rights abuses (P1), anti-discrimination practices (P3) and child labour exclusion (P2) form the foundation of a principled and ethical working environment. Efforts to reduce sick leave by 10% through flexible assignments (P4) and mental health investments including training for managers (P5), enhance employee well-being and organisational culture that are vital to thriving in a competitive, fast-transforming labour market. Continuous sustainability training for all staff (P10), ensure readiness for business transformation, including diversification into new sectors and climate-aligned roles (Opportunity 4 and 5). High participation in professional development (P7) supports adaptability across AI and technology-driven shifts in The Group's operating model (Opportunity 3).

### ALIGNMENT WITH BUSINESS RISKS

People-related policies actively mitigate a range of people-related and compliance risks. Transparent and anonymous reporting of violations (P1) and immediate response to discrimination cases (P3) reduce legal and reputational exposure. The development and rollout of a Modern Slavery and Human Rights Policy (P9) strengthen governance and supplier oversight, addressing vulnerabilities linked to contractor conduct or external partners (Risk 1). Mental health resilience (P5) and succession planning for climate-impacted roles (P8) reduce operational disruptions during periods of instability and change (Risk 3 and 4).

### ALIGNMENT WITH IMPACTS ON ENVIRONMENT AND SOCIETY

The Group's People strategy reinforces its position as a major employer and community influencer. Training and professional development (P7, P10), especially in sustainability and climate literacy, enhance capabilities across The Group, positively influencing product life cycles, mobility innovation and export impact (Impact 2 and 5). Implementation of human rights policies (P1, P9) and proactive talent retention strategies (P8) reinforce ethical leadership and corporate responsibility in both local and global operations.

Refer to the Appendix for a full list of sustainability targets for 2025–2030.

## C6.3.5 INFORMATION TECHNOLOGY



By embedding sustainability across infrastructure, governance, systems and technology, Information Technology (IT) becomes a catalyst for responsible, future-ready growth. The DMA has informed IT's priorities around carbon reduction, ethical data use and inclusive digital systems.

### ALIGNMENT WITH BUSINESS OPPORTUNITIES

IT targets drive decarbonisation, operational efficiency and cross-cutting sustainability outcomes across The Group (Opportunity 1). Renewable energy in data centres (IT1) and carbon neutrality by 2035 (IT2) support low-carbon transformation. Circular IT practices (IT3) reduce waste and cut costs. Ongoing IT training (IT7) and sustainability reporting tools (IT8) enhance agility, transparency and AI-readiness. Green IT investments (IT14), smart technologies (IT15) and an IT Sustainability Policy (IT16) position IT as a key enabler of strategic impact and business resilience (Opportunity 3).

### ALIGNMENT WITH BUSINESS RISKS

IT targets reduce vulnerability to cyber, compliance and reputational risks. Strengthening data privacy, cloud security and system resilience (IT6, IT10) addresses rising threats in a connected operating environment. Promoting supplier sustainability (IT4) and adopting green technologies (IT14) minimises exposure to operational risks. Clear AI governance (IT9) addressed misinformation and digital ethics, while energy efficiency and virtualisation (IT1, IT11) mitigate climate-related disruptions.

### ALIGNMENT WITH IMPACTS ON ENVIRONMENT AND SOCIETY

IT plays a transformative role in shaping The Group's positive impact. Transitioning to renewables and reducing emissions (IT1, IT2) directly support global climate goals (Impact 2). Enhancing accessibility and remote working (IT5, IT13) promotes social inclusion and employee well-being. Training in data ethics, cybersecurity and sustainability (IT7, IT9), along with real-time tracking tools (IT8, IT15), build capacity and position The Group as a digital sustainability leader (Impact 1).

Refer to the Appendix for a full list of sustainability targets for 2025–2030.



## C6.3.6 FINANCE



By embedding sustainability into capital allocation, governance frameworks and data systems, Finance becomes a strategic level for net-zero transformation and building long-term business resilience. DMA insights have shaped Finance priorities and targets around emissions reduction, green investment, risk mitigation and transparent reporting.

### ALIGNMENT WITH BUSINESS OPPORTUNITIES

Finance targets unlock synergies, drive innovation and strengthen future-ready business models. Sustainability risk analysis in investment decisions (F1) and internal carbon pricing (F3) align decision-making with The Group's net-zero pathway (Opportunities 2 and 4). Allocating at least 10% of annual capital expenditure to low-carbon innovation (F2) accelerates the shift toward sustainable mobility and energy-efficient infrastructure (Opportunities 2 and 5). Co-developing models for green revenue streams (F10) and integrating long-term sustainability trends (F11) position Finance as an innovation partner and strategic enabler. Upskilling teams in sustainable finance (F6) builds capability and supports cross-group resilience (Opportunity 1).

### ALIGNMENT WITH BUSINESS RISKS

Finance targets proactively address key financial and operational risks identified through the DMA. Developing a Sustainable Finance Policy aligned with Task Force on Climate-related Financial Disclosures (TCFD) and CSRD (F4) and conducting annual sustainability financial risk audits (F5) improve transparency and reduce exposure to regulatory, market and reputational risks (Risks 3 and 5). Carbon pricing (F3) and supplier sustainability metrics (F9) manage cost exposure and anticipate future regulation (Risk 4). Automating sustainability data (F7) and digitising processes (F9) improve agility, reduce errors and bolster operational resilience in a volatile landscape (Risk 3).

### ALIGNMENT WITH IMPACTS ON ENVIRONMENT AND SOCIETY

Finance plays a catalytic role in advancing environmental and social value. Investment in green infrastructure (F2) reduces lifecycle emissions and supports healthier communities (Impact 4). Transparent, CSRD-aligned disclosures (F4) and sustainability audits (F5) reinforce stakeholder trust and The Group's licence to operate (Impact 3). Training in sustainable finance (F6) and collaboration on green financial models (F10) foster knowledge-sharing and people-related development (Impact 5). Integrating sustainability data into financial planning (F10, F11) ensures that capital deployment reflects environmental and societal impact alongside financial return.

Refer to the Appendix for a full list of sustainability targets for 2025–2030.

## C6.3.7 CORPORATE SUSTAINABILITY DEPARTMENTS (CSDs)



The CSDs develops capacity, connections and collective understanding of sustainability, embedding it into the DNA of the organisation. This is achieved through onboarding, training, leadership engagement and cross-functional collaboration. CSDs targets ensure that sustainability is fully integrated into governance, risk management and performance tracking, with each risk correctly identified and monitored within management and operational activities. Performance is benchmarked annually against industry peers, by the CSDs, to measure and amplify impact, both internally and externally.

### ALIGNMENT WITH BUSINESS OPPORTUNITIES

CSDs targets strengthen inter-company synergies and workforce resilience (Opportunity 1) through shared purpose, sustainability fluency and knowledge exchange. Training and onboarding (CSD2, CSD5) prepare staff for new business horizons, emerging climate-aligned roles and EV sector growth (Opportunities 4 and 5). Risk assessments and data dashboards (CSD6, CSD7) coupled with continuous learning and benchmarking (CSD11) support the transition and diversification into new business sectors (Opportunity 5).

### ALIGNMENT WITH BUSINESS RISKS

Embedding sustainability responsibilities and risk monitoring into governance (CSD3, CSD6, CSD9) mitigates supplier and contract vulnerabilities (Risk 1) and helps maintain competitiveness during industry transformation (Risk 5). Annual community engagement and external stakeholder partnerships (CSD4, CSD10) strengthen relationships and trust and helps to reinforce stakeholder confidence across The Group's operational footprint.

### ALIGNMENT WITH IMPACTS ON ENVIRONMENT AND SOCIETY

The CSDs facilitated sustainability strategy is driving innovation, regeneration and responsibility across The Group. By embedding sustainability into governance and risk monitoring, the CSDs strengthens environmental stewardship and ensures accountability for waste management, End-of-Life Vehicle (ELV) treatment and emissions reduction (Impact 2 and 4). Training and capacity-building initiatives (CSD5) enhance education, skills development and social investment across the workforce and communities (Impact 5).

Refer to the Appendix for a full list of sustainability targets for 2025–2030.





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Chapter 7

# MONITORING AND REPORTING ON OUR PROGRESS





C7.1

## EMBRACE A LEARNING AND CONTINUOUS IMPROVEMENT MINDSET

Recognising that sustainability is a dynamic journey, we have built accountability and learning systems and actions into our strategy. This allows us to track progress against our goals, identify emerging risks and opportunities to drive continuous improvements across all areas of the business.

We have established structured feedback loops between operational teams, sustainability leads and senior management to ensure that lessons learned - whether from pilot projects, audits, customer feedback or supplier interactions - inform future planning and investment decisions. Sustainability indicators are integrated into performance dashboards and quarterly reviews, enabling data-driven analysis and timely course corrections.

In addition, our internal reporting framework supports transparency and shared responsibility. It encourages departments to document challenges, identify opportunities and reflect on how their actions contribute to the company's overarching goals on climate, equity, innovation and stakeholder value.

We also view monitoring as a developmental process. Colleagues are encouraged to

use insights from sustainability data not only for compliance, but to learn, lead and innovate within their own domains. This learning-oriented approach helps foster a culture of accountability, agility and continuous improvement aligned with our Vision and Values; ensuring that our strategy evolves in step with emerging risks, new technologies and stakeholder expectations.

C7.2

## ACCOUNTABILITY AND REPORTING OF EXPECTATIONS

As the sustainability reporting landscape evolves, so too must our approach. We are committed to meeting both **mandatory** and **voluntary** reporting expectations, in line with standards and frameworks.

### Corporate Sustainability Reporting Directive (CSRD) and European Commission Frameworks



The Group is aligning its reporting structures with the CSRD to ensure our disclosures are future-proof, transparent and comparable. This includes preparation for compliance with DMAs, sustainability disclosures under European Sustainability Reporting Standards (ESRS) and data quality assurance processes.

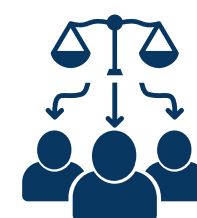
### Non-Mandatory Reporting Commitments

We are also guided by the principles of the UNGC to which we are a signatory. We also learn from the Carbon Disclosure Project (CDP) and similar initiatives. These voluntary commitments inform our efforts to promote human rights, labour standards, environmental stewardship and anti-corruption across our operations and value chains.



### Multi-jurisdictional Compliance

Operating across diverse markets, we maintain active oversight of local and national sustainability disclosure requirements. This includes local environmental reporting laws, emissions tracking obligations and product-specific regulations in the motor distribution and retail sector.







C7.3

# ANNUAL REPORTING AGAINST THE STRATEGY

Our sustainability strategy is underpinned by measurable and time-bound objectives that reflect our environmental and social commitments as well as our governance priorities. Annual reporting will be internal and provide updates on:



PROGRESS MADE  
AGAINST STRATEGIC  
TARGETS



QUANTITATIVE  
AND QUALITATIVE  
DATA INSIGHTS



CASE STUDIES  
OF IMPACT AND  
IMPROVEMENT



AREAS REQUIRING  
FURTHER RENEWED  
FOCUS OR INVESTMENT

These reviews will be submitted to the CST and made available to key internal stakeholders. Over time, reporting outputs will be subject to both internal audit and external review, ensuring credibility and alignment with leading frameworks.







C7.4

## INTERNAL AUDIT

### AUDITING OUR PRACTICE

Internal auditing is a cornerstone of The Group's sustainability governance framework. It plays a critical role in assessing how effectively our sustainability commitments are being delivered, identifying areas for corrective action and catalysing innovation for greater impact.

Our internal audit process is designed to:



Ensure compliance with regulatory requirements and internal policy commitments (e.g. emissions reporting, ethical sourcing).



Track the implementation of sustainability targets across key functions, business units and entities.



Evaluate the accuracy, consistency and integrity of our data collection and reporting systems.



Assess how sustainability considerations are being integrated into operational and strategic decision-making.

We are committed to embedding internal audits as both a performance tool and a learning mechanism - encouraging reflective practice and continuous improvement at all levels of the organisation.

### BUILDING ON OUR EXISTING FOUNDATIONS

We will leverage the robust structures already in place across The Group:



We maintain ISO certifications across several entities across The Group, with established audit cycles, Points of Contact (PoC) and company-specific leads.



We are externally assessed by Investors in People and the BAN entity holds credentials with equivalent recognition.



Internal corporate KPIs are already tracked at business unit level, providing a valuable foundation for sustainability integration.



Annual staff surveys and feedback mechanisms help surface employee perspectives, providing useful insight into culture, engagement and values alignment.



The Points of Contact (PoC) provides a peer-led mechanism for fostering engagement and driving good practice.

In short, we are not starting from scratch. We are building upon existing governance, quality and performance systems to ensure our sustainability strategy is embedded, auditable and continually refined.





## ENSURING OBJECTIVITY AND BEST PRACTICE

To ensure impartiality and rigour, our internal audits will:



Be informed by international standards in sustainability assurance, including guidance from frameworks such as UN Global Compact, ISO 14001 and CSRD (VSME) where relevant.



Be reviewed for alignment with evolving regulatory requirements in the jurisdictions where we operate.



Draw on benchmarking against peer companies and industry good practice.

Training will be provided to all involved in the sustainability audit process to clarify roles, expectations, timelines and escalation procedures. Particular attention will be given to linking sustainability metrics with each company's existing ISO processes and audit teams.

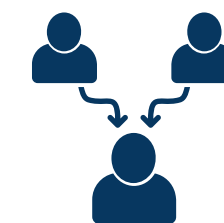
## CLARIFYING ROLES AND RESPONSIBILITIES



Departmental PoC already engaged in ISO processes will play a continued and enhanced role in auditing sustainability progress within their functions.



The CST will provide oversight of the design and coordination of sustainability audits but will not receive or approve ISO audit reports directly.



Outcomes of sustainability-related audits will continue to be reported at the trading company CEO level, with key findings escalated informally to The Group Chairman, as appropriate.



Sustainability audit findings will also be integrated, where relevant, into risk assessments, to support a cohesive view of risk exposure and resilience.



C7.5

## EXTERNAL ASSESSMENT, AUDIT AND ASSURANCE

To reinforce stakeholder confidence and demonstrate transparency, The Group engages external specialists to independently verify the credibility, completeness and robustness of our sustainability performance and disclosures.

As part of this commitment, The Group sought guidance from a technical expert in sustainability specialising in organisational and strategy development. Professor Daniella Tilbury's engagement ensured that our approach to sustainability, target-setting and disclosure not only meets mandatory requirements but aligns with best-practice principles. Importantly, this work embedded assessment and assurance into the heart of The Group's strategic frameworks and through an organisational learning approach.

We also partnered with a Finland-based software company specialising in ESG compliance and data management. This entity conducted our DMA, delivering a comprehensive outcomes report that aligns with the CSRD. Their ongoing support includes group-wide sustainability performance tracking, gap analysis and readiness for future regulatory disclosures.

For financial and technical assurance, The Group currently commissions limited assurance via third-party auditors.

These partners support both the technical and strategic aspects of our assurance framework as part of our forward-looking compliance approach.

Looking ahead, The Group will formalise the engagement of independent third-party assessors to provide external assurance of our sustainability disclosures. This will cover not only specific metrics, such as greenhouse gas emissions but also the processes and systems that underpin our data integrity.

### EXTERNAL ASSURANCE WILL FOCUS ON:



Verification of greenhouse gas emissions and energy data.



Independent review of our double materiality process and stakeholder engagement.



Assessment of progress against defined sustainability targets.

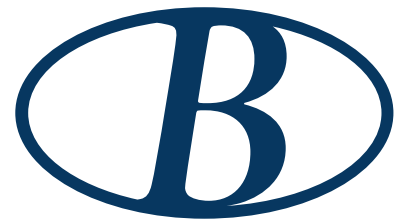


Evaluation of compliance with international frameworks (e.g. CSRD, ISO 9001, ISO 14001 and UNGC).



Audit of the full sustainability report, including the materiality and completeness of disclosures.





While current legislation does not mandate external audit, we believe that proactive assurance enhances both internal discipline and external trust. The intention is to assure the entire sustainability report, not just selected KPIs or carbon metrics.

Assurance partners were selected based on:



Proven expertise in ESG and sustainability reporting.



Alignment with relevant regulatory and sector-specific standards.



Independence, integrity and capacity to provide robust, constructive feedback.

Ultimately, third-party assurance strengthens our reporting process, prepares us for increasing regulatory scrutiny and reinforces our commitment to integrity, accountability and continuous improvement in all aspects of our sustainability journey.







C7.6

## DISCLOSURES AND REPORTS

External assurance activities will focus on two key milestones: the 2027 Mid-Term Report likely to be published in 2028 and the 2030 Final Report.

The 2027 review will assess progress made against strategic objectives to date, evaluate the effectiveness of implementation and determine whether the strategy should be adjusted in response to evolving global trends, regulatory developments and stakeholder expectations.

The 2030 Final Report will provide a comprehensive assessment of The Group's sustainability performance over the full five-year period. It will present progress as the strategy itself evolves, acknowledging the dynamic nature of sustainability work and The Group's commitment to adaptive learning and continuous improvement.

Annual achievements and progress will be disclosed internally with some highlights shared externally through our social media and external communication channels.







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Chapter 8

# COMMITMENT TO FUTURE GENERATIONS







As Albert Mena, Non-Executive Director, reminds us:

*“The Bassadone Automotive Group has consistently shown that sustainability is not merely a goal—it’s a practice deeply embedded in how we operate, engage, and innovate. This deep embedding of sustainability ensures that it is not a side project, but a defining feature of how we think and lead: From transforming historic sites into green facilities to pioneering low-emission mobility solutions for clients, The Group is at the forefront of the profound transformation of the automotive industry.”*

For Board colleague Tony Cooper, sustainability is also a matter of personal responsibility:

*“We each have a duty to protect and renew the planet, and this responsibility extends to our work within The Group. It means ensuring our actions support sustainability, reducing our carbon footprint, adopting greener practices with management, encouraging colleagues to live more sustainably, collaborating with like-minded companies in Gibraltar, and supporting initiatives that help vulnerable communities adapt to climate change.”*

This sentiment is echoed by our leadership across regions. As Peter Bering, CEO of AADS, explains,

*“With over 120 years of trading history, sustainability is deeply woven into our DNA...it’s a mindset and a shared journey. We proudly uphold our core values while continuously innovating to shape a future that reflects our vision.”*

For Andrus Kuus, CEO of Stellantis Distribution in the Baltics, the focus is on empowering customers:

*“Sustainability within The Group means every one of our employees is helping customers make thoughtful, informed choices when selecting the car that truly fits their needs and values.”*







Isabel Molina, Head of Marketing at TOMAX, stresses: *“At TOMAX, we don’t just adapt to change - we drive it.”* For her, sustainability is not a checklist but a mindset, with every decision *“grounded in responsibility, innovation, and a vision of a future where progress and the planet advance hand in hand.”*

Beyond leadership, our teams on the ground embody this commitment daily.

*“Sustainability begins with the choices we make each day, on the warehouse floor and beyond.”* notes Mark Hitchcock, Parts Commercial Manager in Gibraltar. *“Whether sourcing responsibly, reducing waste, or ensuring the well-being of colleagues, sustainability becomes the standard of work, not an add-on.”* He explains that *“by fostering an environment where both our planet and our teams can thrive, we strengthen a culture of long-term responsibility. For my team and I, sustainability is not an initiative; it’s the standard by which we work.”*

Colleagues across The Group express pride in being part of this journey.

*“What inspires me is our collaborative culture that involves all of us in shaping solutions.”* says Catherine Richardson, Communications and PR Executive. *“Being part of a team that’s creating real sustainable change makes me proud to do what I do”* she adds.

Similarly, Gosia Prudzienica in AADS reflects: *“I’m proud to be part of a company that’s not just talking about sustainability but doing something about it.”* She highlights that our strategy *“goes beyond reporting and focuses on real, everyday actions”*, adding that *“It’s great to know that our voices matter and that we’re shaping this journey together.”*

Across BAN operations, sustainability is influencing daily decision-making. BAN Director, Tapio Kontkanen notes, sustainability means *“responsibility taken into account throughout the supply chain, from the product manufacturer to the consumer.”*

In Turku, Finland, the Aftersales Manager, Toni Suonpää adds: *“Sustainability means responsible decision-making that supports the environment, the well-being of our customers and employees – both now and in the long term.”*

Others stress the personal meaning of this commitment.

*“Sustainability is personal—it’s about making sure the next generation inherits more than just our mistakes,”* reflects Aya Chahid, TGS Sales Executive. *“I feel The Group is stepping up by weaving greener technologies and conscious choices into the way we move forward”* she adds.

Christine Pizzarello, Receptionist at our Gibraltar HQ, adds: *“At Bassadone Motors, we believe sustainability begins with ownership. It’s not someone else’s problem—it’s a shared responsibility that starts with each of us.”*

Tangible initiatives match these reflections. Gary Lowe, Storeman at TGS Workshops, describes upgrading the vehicle fleet to fully electric: *“This reflects a strong commitment to sustainability in our local area and demonstrates the full backing of senior management.”*

For Claudio Peralta, Health and Safety Administrator, the focus extends to people as well as planet: *“The Group’s sustainability efforts reflect a genuine commitment to long-term well-being—not just for the environment, but for our people too. I see firsthand how these initiatives positively impact our workplace, from greener spaces to safer, more thoughtful operations greener spaces to safer, more thoughtful operations.”*

External stakeholders also recognise this commitment. Brenda Cuby, from GibSams, a mental health NGO, praises The Group’s approach: *“Their efforts to ensure that every voice is valued in shaping a better future resonate strongly with our mission.”*



Lewis Stagnetto, from The Nautilus Project, adds that *“good sustainability practice doesn’t just make environmental sense - it makes financial sense too. It was impressive to see the intricate planning that the Bassadone Automotive Group have put into their new facilities and see those ideas implemented and working for the benefit of their organisation.”*

From student scholars to senior leaders, from logistics to communications, a common message emerges: The Group’s sustainability journey is authentic, inclusive and impactful.

As Ana Thoppil, a Bassadone Scholar, stated, *“In a time when many companies greenwash or sidestep sustainability goals, Bassadone Automotive Group stands out for its genuine commitment across the value chain - considering not just shareholders and clients, but importantly, The Group employees too.”*

We invite all our colleagues, customers and partners to hold us accountable, challenge us to do better and join us in building a sustainable future - not just for ourselves but for generations to come.

This strategy is more than a static roadmap; it is a dynamic journey of continuous learning, responsibility and purposeful leadership. Together, we will transform bold commitments into meaningful, measurable action. We recognise that sustainable development is a collective endeavour, and at the Bassadone Automotive Group, we are committed to confronting today’s challenges while preparing for tomorrow’s opportunities.







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Chapter 9

# SUSTAINABILITY IN MOTION







# THE GROUP SUPPORTS MENTAL HEALTH

The Group recognises mental health as a vital part of every employee's overall wellbeing. By promoting awareness and offering practical support, we help our people manage psychological, emotional and social challenges at work, and beyond.

## KEY HIGHLIGHTS IN BAS



Established a team of trained Mental Health First Aiders (MHFA) to guide employees toward appropriate help when needed.



MHFA volunteers act as a first point of contact for colleagues experiencing mental health concerns.



Through proactive measures and peer support, The Group creates a healthier, more supportive workplace for everyone.



Ongoing awareness initiatives encourage open conversations and reduce stigma around mental health.







# SUPPLYING HUMANITARIAN ORGANISATIONS

As an automotive group, we take pride in a role of directly supporting humanitarian efforts worldwide. One of our specialist vehicle divisions, based in Gibraltar, is dedicated to customising vehicles, supplying parts and accessories to international aid organisations, NGOs and governments.

The Group is committed to delivering tailored, mission-ready vehicles and services that meet the unique needs of our clients. We have built a long-standing partnership with the United Nations, supporting critical emergency responses worldwide, from the Rwanda genocide and Balkan War to natural disasters like the Southeast Asian tsunami, the Haiti earthquake and health crises such as Ebola and COVID-19. Beyond providing vehicles, we actively contribute to humanitarian missions through road safety training programs, technical and logistical support, and extensive practical training for aid and charity workers - often conducted directly in the field. By combining innovation with purpose, The Group continues to help organisations deliver aid where it's needed most, no matter how challenging the terrain.

## KEY HIGHLIGHTS

### Humanitarian Impact



Our vehicles and services support life-saving missions in disaster zones and conflict areas.

### Empowering Local Capacity



The TGS Fleet Services Team offers training and consultation in vehicle expertise, fleet management, humanitarian aid, security, and education to strengthen local skills and community resilience.

### Operational Efficiency



Our specialised conversions are designed to maximise resource use and durability, reducing waste and improving lifecycle performance.







# TGS FLEET SERVICES TRAINING

What began as a single online course during COVID-19 has grown into a global training hub for sustainable fleet operations. In 2022, TGS Fleet Services launched a fully in-house, multilingual e-learning platform focused on road safety and eco-driving. Tailored to the needs of humanitarian organisations and fleet operators, the courses help teams translate learning directly into safer, greener practices on the ground. Today, the platform delivers training in five languages, with AI enabling access up to 170, empowering organisations worldwide to reduce their environmental impact and operate more responsibly.

## KEY HIGHLIGHTS



Over 769 participants trained during the platform's pilot phase.



5,992 people trained face-to-face across 75 countries.



1,230 trained in 2024 alone through hybrid formats.



Honoured with RoSPA Awards in 2023 and 2024 and now officially a RoSPA Training Centre for certified programs.







# DEVELOPING TOMORROW'S TALENT

The Group see's talent development as essential to the sustainability of the automotive industry. As an example, BAN work closely with vocational schools in Estonia and Latvia to help students build the skills and confidence they need for successful careers. The focus is on bridging the gap between classroom learning and real-world experience, while supporting local communities.

By setting up structured internships and workplace training, The Group give students practical experience inside our dealerships. We also invest in soft skills development, so young people are better prepared to enter the workforce. Staying true to our commitment to social responsibility, we provide technical support to teachers and award stipends to outstanding students, helping ensure opportunities are open to all.

## KEY HIGHLIGHTS



Formal partnerships with vocational schools in Estonia and Latvia to deliver targeted development programmes.



Internship opportunities where students learn directly from industry professionals and take part in daily operations.



Targeted training and soft skills workshops run by our People and Culture Managers, covering job applications, workplace etiquette, and professional communication.



Annual stipends to reward and motivate the most dedicated and promising students.



Technical updates and resources shared with teachers to keep education aligned with the latest industry trends including sustainability.







# SUSTAINABLE TRANSPORT IN ACTION AT BASSADONE MOTORS

Bassadone Motors (BM) is helping drive the transition to cleaner, lower-emission transport across Gibraltar and committed to supporting greener transport solutions for local communities. By offering leasing options for Battery Electric Vehicles (BEVs) to fleet and government departments, we are helping to reduce emissions and modernise public sector fleets.

Through strong partnerships and ongoing dialogue with key stakeholders and decision-makers we can deliver sustainability services that benefit the community.

## KEY HIGHLIGHTS



Supplied a new BEV fleet to HM Government of Gibraltar's Postal Department.



Replaced a 20+ year-old combustion fleet at the Gibraltar Health Authority BEVs under a leasing agreement.



Provided in-house driver training, led by qualified BM mechanics, to help health authority staff operate and maintain BEVs safely and efficiently.







# LOGISTICS IN ACTION: GREENER SHIPPING AND LOCAL EFFICIENCY

At AADS and TGS, logistics is proving to be a powerful lever for environmental improvement. Through targeted changes in shipping and local operations, both teams are demonstrating how sustainability can be embedded into everyday decisions - with measurable results.

## KEY HIGHLIGHTS



### Smarter Shipping Routes

By initiating direct shipments of Hilux vehicles from South Africa to final destinations, we've eliminated unnecessary stops in Gibraltar. This has reduced mileage, handling, and carbon emissions - streamlining operations while cutting environmental impact.



### Proximity-Based Delivery Strategy

Vehicles are now being delivered closer to their point-of-use from hubs like South Africa and Dubai. This shift supports a broader strategy to reduce redundant movements and improve delivery efficiency.



### Local Movement Reductions in Gibraltar

Trading companies have successfully reduced internal vehicle movements within facilities and surrounding areas. These efforts have lowered fuel consumption and emissions while improving operational flow.



### Data-Driven Efficiency Gains

Ongoing analysis of movement patterns is helping teams optimise internal logistics, saving time and resources in complex environments.



### Sustainability Embedded in Decisions

From global shipping routes to local operations, logistics teams are turning overlooked processes into drivers of environmental progress - showing that even small changes can lead to big results.







# AADS 'TRAIN THE TRAINER'

For several years, AADS has delivered its 'Train the Trainer' programme to strengthen local technical and mechanical expertise. The goal is to extend fleet life through better maintenance, smarter repairs and more sustainable use of equipment. By establishing local repair hubs, teams become self-sufficient while waste is reduced through up-cycling and re-purposing parts. Training is designed to be easily shared, ensuring knowledge spreads across teams and communities. Aligned with our values of social responsibility, we actively collaborate with local tradespeople and suppliers to maximise impact.

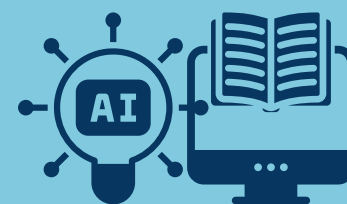
## KEY HIGHLIGHTS



Trained over 1,500 military personnel, with many vehicles still in active use after 12 years.



Switched to digital assessments, cutting paper use and reducing our carbon footprint by up to 75%.



Starting to use AI insights and distance learning to reach more people and reduce travel.







# TGS AT FLEET FORUM CONFERENCE

In 2024, the theme “Accelerating the Change Towards Improved Sustainability” provided an opportunity for TGS to present its Fleet Services and demonstrate how its strategies align with the UN Sustainable Development Goals (SDGs).

The 2025 conference, themed “Collaborating for a Sustainable Future”, once again brought together fleet managers and professionals worldwide to share insights, innovations, and strategies shaping the future of fleet management.

Through this ongoing partnership with Fleet Forum, TGS is positioning itself as a leader in responding to sustainability needs and trends within its market and contributing to positive impact in the wider community.



Hosted by:



**VIRTUAL FLEET FORUM  
CONFERENCE JUNE 2025**





# PUTTING TOYOTA VALUES TO WORK

By combining energy efficiency, recycling, and digital innovation, TOMAX is turning sustainability from a target into real, measurable action, supporting climate goals and building a stronger, more responsible business.

At TOMAX, sustainability is built into our daily operations, from energy savings to circular economy practices. Aligned with Toyota's global environmental vision, we focus on practical steps to reduce our carbon footprint, cut waste and run smarter, more responsible operations.

## KEY HIGHLIGHTS



Upgraded facilities in Spain with LED lighting, lowering energy consumption and improving workplace conditions.



Prioritise reconditioned parts over new ones to reduce waste and support sustainable supply chains.



Explore solutions to help customers dispose of ELVs responsibly.



Reduce paper use through digital tools like online booking systems and AI-driven customer engagement.



Improve inventory and supply chain management to cut overstocking and lower transport emissions.







# FROM VISION TO 1ST PRIZE IN SUSTAINABILITY

In 2025, The Group was awarded 1st Prize at the Gibraltar Sustainability Awards—a milestone that reflects the heart and soul of our sustainability journey.

This year's awards, hosted by The Nautilus Project in collaboration with the Gibraltar Federation of Small Businesses (GFSB), celebrated the most impactful sustainability efforts across the community. The Nautilus Project, a local environmental NGO, is deeply embedded in Gibraltar's sustainability landscape and plays a pivotal role in driving community engagement and environmental awareness.

Our journey began with recognition in 2022, when The Group received the 'Sustainable Vision' Award. Building on that foundation, we are proud to have won 1st prize in 2025—a testament to the progress we've made and the impact of our collective efforts.

A key factor in this achievement was the launch of our first-ever Sustainability Strategy, which was showcased at the awards. The strategy highlighted our commitment to innovation, regeneration, and responsibility, setting a clear direction for future initiatives.

## KEY HIGHLIGHTS

2025



Awarded 1st prize at the Gibraltar Sustainability Awards.

Sustainability Strategy



Launch of our first-ever strategy, showcased at the awards.

Community Engagement



Recognition by The Nautilus Project and GFSB, reflecting our local impact.

Collective Achievement



Success made possible by the dedication and creativity of the entire team.





# APPENDIX







# SUSTAINABILITY TARGETS 2025-2030:

## Central Functions

All targets specified in this document became effective as of 1 June 2025

	Sustainability Target	
HEALTH AND SAFETY	Zero Accident Workplace	HS1 Ensure 100% of incidents are reported through enhanced awareness, accessible reporting platforms and provide annual employee training. Dec 2026 and ongoing
	Emergency Preparedness and Response	HS2 Develop and maintain emergency preparedness plans for various emergencies. Dec 2026 and ongoing
	Occupational Disease Prevention	HS3 Enhance prevention measures for occupational diseases through ergonomic workplace design, regular health check-ups and monitoring of workplace hazards. Dec 2026 and ongoing
	Safety Equipment	HS4 Source 100% of safety equipment and PPE from ISO standards and ethical suppliers through centralised procurement. Dec 2028 and ongoing
	Safe Work Environment	HS5 Ensure all workplace environments meet sustainability requirements (e.g. energy-efficient lighting and ergonomic workstations) while maintaining high safety standards. Dec 2026 and ongoing
	Participation in Safety Initiatives	HS6 Achieve 100% employee completion of annual health and safety training, including refresher courses for high-risk roles. Dec 2028 and ongoing
	Employee Well-being	HS7 Assess mental health, physical health and work-life balance, working closely with People, annually. Dec 2027 and ongoing
	Reduction of Hazardous Material Use	HS8 Assess suppliers and select those that provide safer alternatives and less harmful products, compared to hazardous chemical products. Dec 2027 and ongoing
	SE Data Collection and Monitoring	HS9 Implement digital systems to improve accuracy and timeliness of HS data collection, to reduce manual reporting errors and increasing real-time monitoring by 5% annually. Dec 2027 and ongoing
	Stakeholder Engagement and Feedback	HS10 Continue to regularly engage with internal stakeholders, including statutory bodies, to gather feedback on HS practices. Dec 2026 and ongoing
	Health and Safety Audits	HS11 Conduct annual internal and third-party HS audits, maintaining 100% compliance with health and safety regulations. Dec 2027 and ongoing
	Transparency in Reporting	HS12 Publish HS performance reports quarterly with verified data on incidents and resource use to encompass all sustainability-related initiatives. Dec 2026 and ongoing
	Health and Safety Enhancements	HS13 Ensure all employees continue to have access to adequate welfare facilities, to ensure their safety, health and well-being. Dec 2026 and ongoing
MARKETING	Sustainable Marketing Materials	M1 Involve suppliers in assessing how marketing materials can be created using sustainable practices (digital-first, recycled/FSC-certified paper and fair trades). M2 Ensure supplier adherence to sustainable practices, as defined in our Policy. Dec 2025 and ongoing
	Information and Education for Sustainability	M3 Create at least one campaign annually about the sustainability strategy and aiming towards embedding sustainability in all campaigns. M4 Assess all communications content from a sustainability perspective, against our Policy. Dec 2025 and ongoing
	Ethical Marketing Practices	M5 Continue to ensure that our ethical marketing principles reveal transparency and honesty in all communications. Dec 2025 and ongoing
	Data Driven Sustainability	M6 Use data and analytics to track the effectiveness and sustainability of our social media campaigns and the ethical usage of AI technology. These will be shared with CSDs on a quarterly basis to continuously review and improve impact of future campaigns. Jan 2026 and ongoing
	Promotion of Sustainable Products/Services	M7 Continue to promote The Group’s sustainable products and services throughout the lifespan of this strategy. Dec 2025 and ongoing
	Department Sustainability Policy	M8 Develop a marketing Sustainability Policy outlining core principles and marketing specific commitments that align with The Group’s overall strategy. Dec 2025
	Sustainable Partnerships	M9 Actively seek sustainability-focused partnerships and suppliers as defined in the Policy. Dec 2025 and ongoing
	Carbon Neutral Campaigns	M10 Achieve carbon neutrality for all sustainability marketing campaigns through tracking and reduction, where possible. Jan 2030
	In-house Engagement	M11 Engage 100% of marketing team members in sustainability training and initiatives, bi-annually. Jan 2026 and ongoing
	Tracking and Reporting	M12 Collect and track the departments sustainability commitments annually and share with the CSDs. Dec 2025 and ongoing



Sustainability Target

PEOPLE	Human Rights, Ethical Conduct	P1 Ensure zero tolerance for human rights abuses by maintaining a robust whistleblowing channel that allows employees, customers, and stakeholders to report concerns safely and anonymously. Aim to achieve 100% awareness and accessibility of this channel among all employees.	Dec 2025 and ongoing
	Human Rights, Labour Practices	P2 Ensure zero tolerance for child labour by conducting thorough identification checks for all new hires during the recruitment process.	Dec 2025 and ongoing
	Respect and Anti-Discrimination	P3 Foster a culture of respect for cultural differences and dignity for all employees by ensuring that 100% of reported discrimination cases are addressed within 24 hours. P4 Invest in employee mental health by improving the working environment and delivering mental health training for all Managers, annually.	Dec 2025 and ongoing
	Mental Health and Well-being	P5 Enhance employee well-being by implementing and maintaining participation in mental health programs, stress management workshops and well-being assessments, annually.	Dec 2030
	Parental Support	P6 Provide paid parental leave in line with legal requirements and aim for at least 90% uptake among eligible employees.	Dec 2025 and ongoing
	Learning and Development	P7 Ensure at least 70% of employees participate in professional development activities annually.	Dec 2025 and ongoing
	Talent Development, Climate Transition	P8 Conduct retention interviews with all employees identified in succession plans and emerging talent pools, supporting roles impacted by climate-related changes.	Dec 2026 and ongoing
	Policy and Governance	P9 Develop and implement a Modern Slavery and Human Rights Policy to ensure ethical practices and promote social responsibility within the organisation. P10 Ensure all employees receive annual sustainability training on The Group Sustainability Strategy and that all new employee’s complete sustainability training within their first six months of employment.	Dec 2025 and ongoing
	Sustainability Awareness and Training	P11 Organise a sustainability management conference for all employees within managerial positions.	Dec 2030
	Green Investment and Emissions Reduction	F1 Integrate sustainability risk analysis into relevant capital investment decisions, over a certain threshold, to ensure alignment with The Group’s net-zero pathway. F2 Where there is a business case for the investment, fund annual capital expenditure to low-carbon innovations (e.g. EV charging infrastructure, energy-efficient facilities; energy self-sufficiency in sites). F3 Where required/applicable, embed carbon pricing in financial planning to account for the cost of emissions.	Dec 2026 and ongoing  Dec 2030 and ongoing
FINANCE	Governance – Risk, Disclosure and Transparency	F4 Develop a Sustainable Finance Policy aligned with Task Force on Climate Related Financial Disclosures (TCFD) and CSRD to guide financing decisions and disclose climate-related risks. F5 Conduct an annual sustainability financial risk audit, covering climate, regulatory and reputational risks. F6 Ensure 100% of senior finance staff receive training in sustainable finance, sustainability reporting, and anti-greenwashing compliance by end of 2026. All other finance staff to receive sustainable finance induction training.	Dec 2025 Dec 2027 and ongoing Dec 2030
	Operational – Data, Reporting and Efficiency	F7 Explore sustainability data capture in finance systems to enable reporting across The Group. F8 Maintain financial process efficiency through digitalisation and low-carbon procurement strategies.	Dec 2027 and ongoing
	Strategic – Green Growth and Innovation	F9 Partner with internal business units to co-design financial models that support green revenue streams (e.g. EV services, sustainable leasing models). F10 Finance team assesses and incorporates long-term sustainability trends into financial planning and capital allocation.	Dec 2027 and ongoing
	Long-Term Financial Planning and Sustainability Integration	F11 Finance department evaluates the cost savings or revenue growth opportunities from sustainability initiatives (e.g. energy efficiency and waste reduction).	Dec 2027 and ongoing
	Greenhouse Gas Emissions (reducing)	FAC1 The aim is to reduce Scope 1 carbon emissions by 50% and be on track to achieve carbon neutrality across all facilities by December 2035.	Dec 2030
FACILITIES	Greenhouse Gas Emissions (reporting)	FAC2 Monitor and report on direct (Scope 1), indirect (Scope 2) and value chain (Scope 3) GHG emissions, with data reported in sustainability reports.	Dec 2030
	Renewable Energy	FAC3 Conduct an assessment on how to generate or source 60% of electricity from non-emitting renewable energy source.	Dec 2030
	Electric Fleet	FAC4 Sustain the number of our internal EV-fleet and ensure that these are replaced in future with another electric vehicle.	Dec 2028 and ongoing





Sustainability Target

FACILITIES	EV Charging Points	FAC5 Provide EV charging points in proportion to the number of public car parking spaces available.	Dec 2027
	Resource Management Strategy	FAC6 Develop and disclose a comprehensive resource management strategy for responsible sourcing.	Dec 2028
	Waste Segregation	FAC7 Segregate 70% of waste to ease recycling and reuse, handled by verified waste dealers.	Dec 2026 and ongoing
	Circular Economy Transition	FAC8 Report annually on waste reduction, reuse, and recycling initiatives within facilities, transitioning toward a circular economy.	Dec 2026 and ongoing
	Water Pollution Mitigation	FAC9 Sustain zero water pollution from facilities.	Ongoing
	Controlled Emissions	FAC10 Maintain 100% controlled emissions within facilities according to standards.	Ongoing
	Climate Risk Assessment	FAC11 Complete a climate-related risk assessment and implement adaptation and resilience measures.	Dec 2027
	Contingency Planning	FAC12 Conduct a vulnerability assessment for climate impacts and update contingency plans.	Dec 2026
	Indoor Air Quality and Green Spaces	FAC13 Sustain and improve indoor air quality, green spaces and well-being provisions.	Dec 2027 and ongoing
	Biodiversity Assessment	FAC14 Complete a biodiversity assessment bi-annually and implement strategies to minimise impact on biodiversity.	Dec 2027 and ongoing
	Sustainable Building Practices	FAC15 Ensure all new builds adopt sustainable building practices.	Dec 2027 and ongoing
	Sustainability Policy	FAC16 Develop and implement Facilities Sustainability Policy including guidelines for procurement aligned with The Group’s overall strategy.	Dec 2026 and ongoing
	Facilities Sustainability Report	FAC17 Ensure relevant facilities data is integrated into the company’s sustainability report with accurate, verifiable data.	Dec 2028 and ongoing
	Reporting Integration	FAC18 Integrate facilities data with third-party software (Sustashift.fi) for reporting.	Dec 2026 and ongoing
	Renewable Energy for IT Infrastructure	IT1 Transition in-house IT operations to renewable energy sources, aiming for 80% renewable energy for data centres across The Group.	Dec 2030
	E-waste Reduction and Circular IT Practices	IT2 Extend hardware life cycles, implement reuse and refurbishment practices and ensure responsible IT hardware disposal through certified recycling partners.	Dec 2026 and ongoing
	Sustainable IT Procurement and Green IT Solutions Investment	IT3 Assess key IT suppliers against sustainability criteria, including energy efficiency, responsible sourcing, prioritise and collaborate with those that demonstrate progress and prioritise investment in energy-efficient hardware and sustainable IT solutions for all relevant projects.	Dec 2027 and ongoing
INFORMATION TECHNOLOGY (IT)	Digital Accessibility	IT4 Ensure digital tools and platforms are assessed for accessibility and work toward continuous improvement to support all employees, including those with impairments.	Dec 2026 and ongoing
	Data Privacy and Cybersecurity	IT5 Maintain a strong cybersecurity posture by implementing continuous monitoring, staff training and compliance checks to prevent and swiftly respond to data breaches.	Dec 2025 and ongoing
	IT Training and Development	IT6 Provide annual, role-specific training for all IT staff, including core topics in cybersecurity, data ethics, and sustainability, aligned with recognised standards where applicable.	Dec 2027 and ongoing
	ESG Data Tracking and Reporting	IT7 Implement tools to track, verify and report sustainability metrics across IT operations.	Dec 2029 and ongoing
	Ethical Use of AI and Data	IT8 Develop and roll out guidelines and training on ethical AI and data use for all relevant IT staff.	Dec 2025 and ongoing
	IT Risk Management	IT9 Implement annual IT-specific risk assessments for environmental, social and cyber risks.	Dec 2026 and ongoing
	Cloud Optimisation and Virtualisation	IT10 Scale virtual servers as needed and continuously optimise cloud infrastructure to reduce environmental impact.	Dec 2028 and ongoing
	Software Development Resource Optimisation	IT11 Set annual targets to re-engineer and improve system performance, reducing energy consumption and software load times.	Dec 2029 and ongoing
	Support for Hybrid and Remote Work	IT12 Develop IT solutions that enable flexible and sustainable hybrid/remote working, focusing on energy-efficient tools and seamless collaboration.	Dec 2026 and ongoing
	Green IT Solutions Investment	IT13 Collaborate with suppliers to prioritise investment in energy-efficient hardware and sustainable IT solutions for all relevant projects.	Dec 2027 and ongoing
	Innovation for Sustainability through Digital Solutions	IT14 Deploy innovative digital solutions, such as smart energy management tools, to optimise sustainability in IT operations and infrastructure.	Dec 2030 and ongoing
	IT Sustainability Policy Development	IT15 Develop and publish an IT Sustainability Policy, aligned with The Group’s overall sustainability strategy.	Dec 2025



Sustainability Target

CSDs

Sustainability Culture Development	<b>CSD1</b> Launch and deliver a Group-wide sustainability culture program incorporating awareness campaigns and storytelling initiatives featuring staff-led sustainability efforts, interactive workshops and leadership engagement sessions.	Jan 2026 and ongoing
Sustainability Onboarding and Induction	<b>CSD2</b> In partnership with People, ensure that 100% of new hires across all business units receive sustainability induction materials integrated into People onboarding, with content refreshed annually to reflect strategy updates and global trends.	Dec 2025 and ongoing
Cross-functional Sustainability Integration	<b>CSD3</b> Working closely with the Contact Points establish clear responsibilities for cascading sustainability strategy, reporting progress, and co-developing unit-specific sustainability initiatives.	Dec 2025 and ongoing
Community and Outreach Engagement	<b>CSD4</b> Organise at least one annual community sustainability events per region (e.g. workshops, partnerships, volunteer actions), engaging employees and local stakeholders to build shared value and external impact.	June 2026
Training and Capacity Building	<b>CSD5</b> Co-design and deliver tailored sustainability training modules for 100% of business units, with role-specific tracks. Include optional deep-dive modules and internal certifications for interested staff.	Dec 2026
Sustainability Risk Identification and Monitoring	<b>CSD6</b> Conduct annual sustainability risk assessments, fully integrated into The Group’s risk management framework, with documented mitigation strategies and responsible leads per risk area.	Feb 2026
Internal Sustainability Dashboard	<b>CSD7</b> Develop and implement real-time dashboards for internal sustainability KPI tracking and functional levels, with quarterly updates and alerts for underperformance.	Mar 2026
Internal Sustainability Award	<b>CSD8</b> Launch an award to recognise and reward employee sustainability champions biannual.	Jan 2026
Governance and Accountability Framework	<b>CSD9</b> Prepare and support the sustainability governance actions listed in the strategy including briefing papers for meetings, organising mid-term strategy review in 2026 and final review in 2029.	April 2026
Stakeholder Engagement and Partnerships	<b>CSD10</b> Organise and gather external stakeholder meetings in support of the strategy and external facing sustainability projects. Build on the relationships established during the process of building this strategy.	May 2026 and ongoing
Continuous Learning and Benchmarking	<b>CSD11</b> Conduct annual benchmarking exercises comparing The Group’s sustainability performance with at least five industry peers and integrate top findings into ongoing strategy refinements and annual reports.	Feb 2027
Reporting and Adaptation	<b>CSD12</b> Implement an annual review and adaptation process for the sustainability strategy, using internal data, governance feedback, employee input to report on process and revise approaches where targets are off track.	May 2026 and ongoing



# ENGAGEMENT IN THE STRATEGY DEVELOPMENT PROCESS

## BAN STAKEHOLDER ENGAGEMENT MEETING - 7 MAY 2025

The stakeholder engagement session for Bassadone Automotive Nordic (BAN) was held on 7th May 2025, bringing together key partners from across the automotive value chain.

ATTENDEES	ORGANISATION	AREA OF FOCUS
Aapo Mäkinen	Sales Director, SE Mäkinen Oy	Supply Chain Efficiencies
Kaj Nurminen	CEO, Assistor Oy	Supply Chain Efficiencies
Kim Weckström	Sales Director, Santander Consumer Finance Oy	Vehicle Financing
Ville Nikkola	Sales Director, Nokian Renkaat Oy	Tyre Manufacturing
Kasper Lunström	Director, Fennia	Insurance

## BAS STAKEHOLDER ENGAGEMENT MEETING - 21 MAY 2025

The stakeholder engagement for Bassadone Automotive South (BAS) took place on 21st May 2025. Participants represented a range of sectors relevant to BAS' operations, reflecting environmental, educational, health and heritage priorities.

ATTENDEES	ORGANISATION	AREA OF FOCUS
Lewis Stagnetto	The Nautilus Project	Environment (Natural)
Bjarne Low	Trusted Novus Bank	Business and Finance
Joanna Pincho	Trusted Novus Bank	Business and Finance
Gianna Bosano	The Gibraltar College	Education (Internships)
Adrian Avellano	AMA Sustainabuild	Environment (Built)
Claire Montado	Gibraltar Heritage Trust	Heritage (Cultural and Historical)
Brenda Cuby	GibSams	Health (Mental Wellbeing)
Charles Savignon	Gibraltar Joinery and Building Services	Environment (Built)
Stewart Harrison	HM Government of Gibraltar	Environment, Education and Transport

# AUTHOR ATTRIBUTION

This Sustainability Strategy was authored by Professor Daniella Tilbury, Sustainability Expert Advisor to the Bassadone Automotive Group.

She designed the strategic process that informed the identification of The Group’s sustainability pathways and the development of its governance and reporting frameworks. Collaborating closely with Martin Figueras and Rachel Goodman Fox, Professor Tilbury supported the alignment of The Group’s ambitions with international sustainability standards and the evolving expectations of stakeholders.

In line with our commitment to environmental responsibility, we have minimised the number of printed copies produced of this strategy. Paper used to print this document is sourced from responsibly managed, FSC-certified forests.



BASSADONE  
AUTOMOTIVE GROUP



# INTERESTED IN OUR SUSTAINABILITY EFFORTS?

We're committed to building a more sustainable future and welcome any questions or feedback you may have.

If you'd like to learn more about our sustainability initiatives, policies, or practices, please don't hesitate to get in touch.



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