



ESG Report 2024

# ESG at Flix: a snapshot of our 2024

## Environmental

**1.5**



**million tonnes**  
of CO<sub>2</sub> avoided by our  
customers in 2024  
choosing Flix<sup>1</sup>

**90**



**coaches** powered with  
alternative drives and  
fuels on the road

## Social

Nearly

**5,600**



global employees originating from **106** countries

**37**

Employee NPS (Net Promoter  
Score)<sup>2</sup>, 13 points above tech  
industry benchmark



Proportion of  
women in top  
management<sup>3</sup>

**20%**



New Supply Chain **policy statement**<sup>4</sup>

## Governance

**2**

ESG related KPIs in place  
for Management Board's  
Short-Term Incentive  
(STI) plan



ESG topics regularly  
reviewed by **ESG Steering  
Committee** and **Audit  
Committee**



**6,800**

**destinations connected in  
more than 40 countries**

### Notes:

1. Over other modes of transport that are more polluting in terms of CO<sub>2</sub>.
2. Measuring employee satisfaction.
3. Measured as Management Team plus two levels below.
4. In alignment with the German Supply Chain Due Diligence Act (LkSG).

# Letter from the CEO



**Dear stakeholders, partners, and valued team members,**

Since we began with voluntary ESG reporting in 2023, this time of the year has become an important moment for self-assessment and reflection.

On one hand, going over the numbers and milestones that shaped the previous year serves as a precious reminder of what we achieve together with you every day – and 2024 was no exception.

As we reached a total of 6,800 destinations connected, we took significant steps in our global expansion. This enabled us to pursue our vision of providing affordable and sustainable travel for all in new markets with a high demand for collective travel. The start of operations in India, which also marked our entry in Asia, is probably the most significant example of this. Such a huge advancement shows the efficiency of our asset-light business model, having an integral core in a well-collaborated value chain and a sound tech infrastructure as a catalyst for innovation and scalability. With a global team of nearly 5,600 employees to steer the roadmap and a solid network of bus and train partners to enact it, we drive this vision further with greater conviction every year.

On the other hand, we should not forget that growth and responsibility are deeply intertwined. While taking a moment to celebrate our achievements seems appropriate, as a market leader in several markets – and a relevant player in many others – we must increasingly consider the impact of our actions on the communities we engage with every day.

As a travel provider, we cannot overlook the consequences of transportation on the planet, especially against the drastic effects of climate change. While collective travel remains an easy-to-grasp opportunity for our customers to reduce their environmental impact, as a tech leader, it is crucial for Flix to seize any existing opportunity to trigger innovation within the sector to the best of our resources. In spite of the challenges we face with infrastructure availability and technological development, we will keep on the path to progressive decarbonization, according to our vision to lead by example for the wider industry.

Likewise, we must acknowledge the responsibility we have towards our employees and make sure that we can provide a space where all individual stances feel safe, valued and represented. Which, by the way, I see as a strategic asset for continuous and sustainable growth, on top of a moral responsibility that we must fulfil. Also, at the level of our impact on the people, as a provider offering a well-connected network reaching beyond major hubs, we can enable travel for those living in areas that are scarcely connected. Both as an employer and a travel provider, we can create value for people.

In the light of this, reporting on our ESG performance is set within the foundation of evaluating our actual and potential impact on the planet and society, beyond just recognizing our achievements.

It gives us the timely chance to be of advantage to the communities we engage with, as well as address our shortcomings. Failing to understand our stakeholders' needs and missing out on this opportunity will make us just another transportation company, unable to survive future transformations and secure its customers and workforce with the surety they seek. This is not what we want to be, nor will it be how we lead.

Aided by robust governance, we are confident that we can continue providing this value for our stakeholders. To them – our team, customers, and bus and train partners – I want to express my deepest gratitude for sticking with us in this adventure towards transformative change.

A handwritten signature in blue ink, which appears to read 'André Schwaemmlein'.

André Schwaemmlein,  
CEO and Co-Founder of Flix SE

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# 1. General Information

## ➤ 1.1 Basis for preparation

This Flix 2024 ESG report has been prepared on a consolidated basis for data relevant from Jan- Dec 2024. Unless explicitly mentioned, the KPIs in this ESG report are derived in the same scope of consolidation as the company's financial statements, hence applying to Flix Group (Flix), comprising Flix SE and its subsidiaries. For certain KPIs, Greyhound and Kâmil Koç businesses are excluded.

As part of the Double Materiality Assessment (DMA) process, Flix's value chain was extensively mapped in order to capture relevant stakeholder interests and their related impacts, risks and opportunities. Flix's upstream value chain included bus and train partners in local markets, as well as bus and train drivers and crew. Furthermore, Original-Equipment-Manufacturers (OEMs) are also part of the upstream value chain and indirectly affect Flix. Flix's own operations include office-based employees, as well as a proportion of train and bus employees who are directly employed in a few markets (within Greyhound, Kâmil Koç and FlixTrain businesses). Flix's downstream operations include bus and train passengers, travel agencies and long-distance carriers. The value chain also reflects the duality of Flix business: partnership and own operation model.

During the DMA process conducted by Flix for 2024, the time horizon was set as:

- short term (less than one year)
- medium term (1-5 years)
- long term (more than 5 years).

In 2024, sustainability issues did not constitute material impacts on Flix's financial position, financial performance and cash flows. We have not identified any material current financial impacts. In accordance with Corporate Sustainability Reporting Directive (CSRD) guidance, we have decided to postpone the reporting on the anticipated financial effects of environmental matters and the allocation of financial resources (Capital Expenditure and Operating Expenditures) linked to environmental projects, until after our initial year of mandatory reporting.

This ESG report has been issued on a voluntary basis, as the CSRD regulation has not been implemented yet by the German Parliament and therefore has not yet become effective for German-based companies. Nevertheless, this report's structure and content is based on recommendations of the European Sustainability Reporting Standards (ESRS) provided by European Financial Reporting Advisory Group (EFRAG) under the CSRD, representing our commitment to transparency towards our stakeholders. <sup>1</sup> Due to the different reporting framework adopted as compared to last year, some retrospective figures cannot be calculated. This report has not been externally audited.

For matters relating to this ESG Report, please reach out [responsibility@flixbus.com](mailto:responsibility@flixbus.com).

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<sup>1</sup> As we follow the ESRS on a voluntary basis, we do not yet comply with the full scope of ESRS requirements.

## ➤ 1.2 Strategy, business model & value chain

### GROUP STRATEGY

Flix is a global travel-tech company providing sustainable and affordable travel options to millions of travellers worldwide.

In order to execute on this vision, we are focused on delivering on our profitable growth strategy, focused on three main goals: first, to increase profitability in our core markets; second, to drive commercial and operational excellence; and third, to deliver continued growth.

The first goal aims to grow and strengthen profitability in our core markets, Europe and North America, where our business is more mature. In Europe specifically, we target covering residual profitable routes and adding further destinations. In North America, we focus on our partner network and continuing to increase the cost efficiency of our Greyhound operations.

To achieve our second key goal, driving commercial and operational excellence, we are constantly striving to deliver best-in-class travel experience and, alongside an expanding array of ancillary products (e.g. seat reservation and extra luggage), retaining our passengers and attract new passengers in the future. In parallel, we keep working to fulfil our commitment to drive organizational efficiency, automatization, and scalability, aiming for an even leaner and more cost-effective structure.

Finally, to actualize our third goal, we continue to grow – both in terms of new offerings in our current markets and expanding to new markets entirely. Particular attention has been given to Latin America and Asia – in late 2023 and early 2024, we started operations in Chile and India, and we are preparing to launch operations in Mexico and Peru in 2025. To continue our strong growth trajectory, preparation for expansion into additional markets is currently underway, as well as a significant expansion of the FlixTrain business's current operational footprint.

Throughout our strategy plan, sustainability will continue being core of Flix's DNA. We commit to driving safe and sustainable mobility for generations, maintaining strong business ethics and integrity, and making a positive impact on our planet, people and society as a whole. This is reflected in the overall Flix ESG Strategy, which summarizes our approach to sustainability across three overarching concepts, underpinned by robust governance as a foundation: Enabling Travel, Protecting the Planet, and Caring for People.

We are simultaneously focused on the present and the future: we are equally as committed to connecting people around the world with affordable travel as we are to implementing meaningful climate strategies to protect our planet's future. We try to lead by example: together with our partners, we set high environmental standards and push the boundaries for alternative fuels and drives, while providing more sustainable collective alternatives to the individual private car in the present.

Additionally, Flix has developed a climate strategy to further decarbonize the emissions of its bus fleet by gradually converting our fleet to alternative fuels and drives, with the aim of achieving Net Zero emissions by 2040 in Europe and 2050 globally, in line with the Science Based Targets initiative (SBTi) framework.

Finally, in the transportation industry, to care for people means to prioritize safety above all – for our customers, employees, crews, and all those we share the road with. And caring for people also means promoting an equal, diverse and inclusive workforce. Together with our partners, we are raising the bar for road safety – and helping raise standards in the mobility sector to create a safe, equal, diverse and inclusive work environment across the entire industry.

## Driving sustainability is at the core of Flix's strategy and is embedded in everything we do



### 1 Enabling travel



#### Driving smart, sustainable travel for everyone

- Offering **lower-emission travel** options<sup>1</sup>
- Continuous **network expansion**

### 2 Protecting the planet



#### Reducing environmental impact

- **Climate strategy** with 3 levers: Avoid, Reduce, Engage
- GHG<sup>2</sup> emissions measurement and reporting
- **Efficient fleet** with high share of Euro VI buses<sup>3</sup>

### 3 Caring for people



#### Caring for passengers, drivers and employees

- **Safety management** system in place
- Extensive **driver trainings** carried out
- **Talent retention:** continuous training and flexible working arrangements



- Continue **network and service expansion**
- Act as a **catalyst for innovation** in the bus transportation ecosystem

- **Near-term** emission reduction targets **validated** in 2024
- **Net Zero goals:** 2040 in Europe, 2050 Globally



- Committed to **employee engagement** through monthly Pulse Surveys
- Act on workforce survey results to **develop and retain top talent** and ensure wellbeing

### 4 Governance: Top-of-house accountability with ESG responsibilities assigned across executives & board



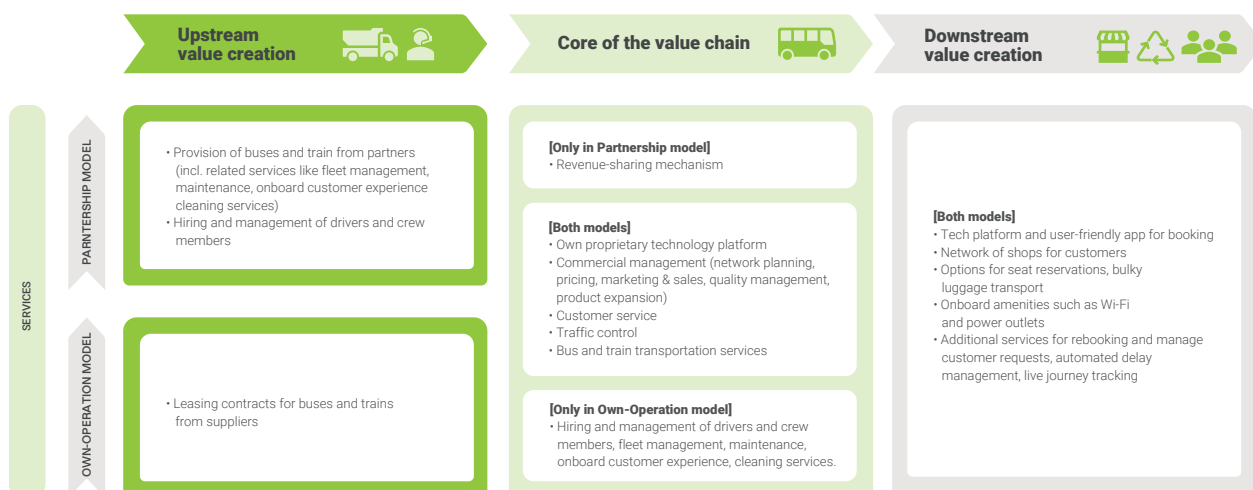
Notes:  
1. vs. other modes of transport like personal cars (with combustion engine) and airplanes;  
2. Greenhouse Gases;  
3. In Europe.



## BUSINESS MODEL AND VALUE CHAIN

Flix is offering its services via its proprietary and innovative technology platform, with an established presence in geographies such as Europe, North America and Türkiye, and ongoing further expansion in Latin America and India. We are convinced that Flix is distinctly positioned in the global travel market thanks to its value proposition of digitalizing traditional means of travel, whose key highlights are represented in Flix value chain below.

### Value Chain



The upstream side of Flix value chain can be bifurcated into two main models:

- ▶ In the partner model, Flix relies on more than 1,000 bus and train partners, which guarantee service continuity via a fleet of nearly 3,000 buses. In this model, the partners are responsible for the provisions and maintenance of buses and trains, drivers hiring and management, and fuelling operations. Flix utilizes a revenue-sharing mechanism to ensure aligned interests with its mobility partners.
- ▶ In the owned-operation model, Flix operates a fleet of 13 trains and nearly 950 owned buses in North America and Türkiye, which all together allow to serve millions of customers in the mid- to long-distance travel segment. In this case, Flix manages leasing and maintenance of buses and trains, drivers hiring and management, and fuelling operations.

Regardless of the model, at the core of the value chain, Flix's value proposition is centred around data-based, seasonally optimized and demand-oriented networks and schedules, while applying for concessions from a multitude of authorities and setting optimal price points to ensure a high utilization of the vehicles.

Such aforementioned values are enabled by leveraging on Flix's own proprietary technology platform, which allows to optimally connect own and partners' supply with customers' demand and needs. On top, Flix fosters the benefits deriving from such a technological-based solution, via dedicated teams to manage marketing, branding, sales and customer services for our stakeholders.

On the downstream side, Flix's goal is to provide reliable, sustainable, and affordable long-distance travel. To successfully achieve such a purpose, Flix is driven by innovative solutions that create value for passengers by meeting their travel needs through a cutting-edge tech platform and user-friendly app. Whether booking tickets online via our app or website, or in person at one of our shops, customers benefit from access to over 6,800 destinations in 2024, seat reservations, options to transport bulky luggage, and other onboard amenities such as Wi-Fi and power outlets. Additional services—including intuitive online processes for rebooking and customer requests, in-person support through our agencies and shops, automated delay management, and live journey tracking—enhance the overall experience. Combined with a dense network of frequent and exclusive services, delivered either through our mobility partners or our

own fleet, these offerings helped us welcoming more than 90 million passengers globally in 2024.

Not least, to ensure meeting the ambitious targets and goals, Flix continuously monitors regulatory developments and sustainability-related financial risks, embedding high-likelihood changes into our mid- and long-term financial plans, as detailed further in the present document.

## ➤ 1.3 Governance

Flix SE is governed by a Dual Board structure, comprising the Management Board responsible for the development and execution of the Company's business strategy and the Supervisory Board overseeing the Management Board. Under the Supervisory Board, there are two Committees: the Audit Committee and the Remuneration & Nomination Committee. The highest governance authority is the General Meeting, which, among other responsibilities, appoints the Supervisory Board. The Board mandates are governed by Rules of Procedures of the Supervisory Board.

In 2024, Flix's Supervisory Board maintained eight members. Until November 2024, the Supervisory Board included three independent members and five members representing Flix's key investor groups<sup>2</sup>. Following Flix's new investment round, two new members representing the new investment groups were appointed, and two of the incumbent independent members left the Board. The Board members represent a spectrum of experience backgrounds, bringing in expertise from financial, industrial, transportation and technological sectors.

### Flix Supervisory Board composition as of 31<sup>st</sup> Dec 2024

Name of Supervisory Board Members	Profession	Independence	Audit Committee	Remuneration & Nomination Committee
Bodo Uebber (Chairman)	Independent Business Advisor	Yes	-	Chairman
Jochen Engert (Deputy Chairman)	Co-founder, Flix	-	Member	-
Andreas Aschenbrenner	Partner, EQT Partners	-	-	Member
Christoph Jung	General Partner, HV Capital	-	-	Member
Dominik de Daniel	CEO, Kühne Holding AG	-	Chairman	-
John Doran	General Partner, TCV	-	-	-
Jörn Nikolay	Investment Manager, General Atlantic	-	-	-
Stefan Dziarski	Partner, Permira	-	Member	-

Composition of administrative, management and supervisory bodies (as of Dec 31 <sup>st</sup> , 2024)	Executive (headcount)	Non-Executive (headcount)
Management Board	3	-
Supervisory Board	-	8

<sup>2</sup> Flix does not have any employee representatives within its Supervisory Board.

Board diversity (as of Dec 31 <sup>st</sup> , 2024)	Gender (Female: Male)	Independence (in %)
Management Board	0:3	-
Supervisory Board	0:8	12.5%

## Methodology

*Executive members are responsible for managing day-to-day operations and implementing the company's strategic plans and policies.*

*Gender diversity ratio is calculated as an average ratio of female to male board members. Independent board members are defined as those who exercise their judgment objectively without being influenced by external factors or conflicts of interest.*

As of 31<sup>st</sup> December 2024, the Management Board consisted of three members: André Schwämmlein (CEO and co-founder), Daniel Krauss (CIO and co-founder), and Christoph Debus (CFO). Together with other senior executives Max Zeumer (CCO) and Fabian Stenger (COO), they form the Management Team of Flix.

The Management Board is actively involved in the general governance processes, specifically through the various functionalities under the CFO, such as risk management, internal control system, data protection and compliance department, internal audit, and legal. These functionalities have reporting lines leading up to the CFO and are continuously under observation from the Audit Committee of the Supervisory Board, with formal reporting on a quarterly basis.

When it comes to governing ESG topics and addressing key material impacts, risks and opportunities (IROs), both the Supervisory and Management Boards actively consider the impacts, risks, and opportunities when overseeing the company's strategy, major transactions, and risk management process. At the Supervisory Board level, the Audit Committee plays a crucial role in overseeing ESG topics and ensuring that risk management is properly integrated into the company's decision-making process. Progress on ESG topics (in general, as well as specific material IROs) is presented to the Audit Committee during the quarterly updates.

At the Management Team level, each of the members have specific ESG-related responsibilities. The CEO oversees ESG strategy and targets, the CFO oversees corporate governance and non-financial reporting obligations, CIO oversees cybersecurity and people-related IROs, whereas the COO leads our decarbonization and fleet transformation efforts. Additionally, we have an established ESG Steering Committee which includes Management Team members, ESG leadership team, and senior leadership sponsors relevant to the various material IROs. This committee meets on an ad-hoc basis during the year and monitors key updates in the ESG strategy and roadmap. The results of the first DMA analysis conducted in 2024 were also presented to and validated by the ESG Steering Committee during the year.

In 2024, the ESG reporting and governance function shifted from the ownership of the Corporate Affairs team into the Accounting department, under the direction of the CFO. To further strengthen ESG integration, we are enhancing collaboration between the Financial Planning & Analysis team and the Risk Management team, ensuring risk assessments and financial planning remain closely aligned. Future initiatives will focus on improving data-sharing mechanisms and increasing transparency through proper documentation.

In 2024, the Short-term Incentive (STI) Plan set for the Management Team and other eligible employees includes financial KPIs as well as two social KPIs focusing on Customer Net Promoter Score (NPS) and Employee Net Promoter Score (eNPS). While both of these KPIs are calculated at a Group level, the Customer NPS KPI also includes a 50% weight for the local market targets of the same KPI. These STI targets were duly approved by the Supervisory Board.

## STATEMENT ON DUE DILIGENCE

As prescribed by ESRS, due diligence is the process by which undertakings identify, prevent, mitigate and account for how they address the actual and potential negative impacts on the environment and people connected with their business. Below is a reference to the various sections of the report that describes our due diligence process:

Core elements of due diligence (ESRS 1)	(Sub)Section Reference within the Report	Page Reference
a. Embedding due diligence in governance, strategy and business model	1.3 Governance	10
	1.2 Strategy, business model and value chain	7
	1.4 Impacts, risks and opportunities	14
b. Engaging with affected stakeholders in all key steps of the due diligence	2.1.1 (Climate Change) Interests and views of stakeholders	16
	3.1.1 (Own workforce) Interests and views of stakeholders	33
	3.1.3 (Own workforce) Engaging with own workforce and worker representatives	34
	3.2.1 (Workers in the Value Chain) Interests and views of stakeholders	42
	3.2.4 (Workers in the Value Chain) Engaging with value chain workers and remediating negative impacts	44
	3.3.1 (Affected Communities) Interests and views of stakeholders	45
	3.3.4 (Affected Communities) Engaging with affected communities and remediating negative impacts	47
	3.4.1 (Consumers and end-users) Interests and views of stakeholders	48
c. Identifying and assessing adverse impacts	2.1.2 (Climate change) Material IROs and their interaction with strategy and business model	17
	2.2.2 (Pollution) Material IROs and their interaction with strategy and business model	31
	3.1.2 (Own workforce) Material IROs and their interaction with strategy and business model	33
	3.2.2 (Workers in the Value ChainValue chain workers) Material IROs and their interaction with strategy and business	42
	3.3.2 (Affected communities) Material IROs and their interaction with strategy and business model	46
	3.4.2 (Consumers and end-users) Material IROs and their interaction with strategy and business model	49
d. Taking action to address these adverse impacts	4.1.1 (Business conduct) Identification and assessment of Material IROs	52
	2.1.4 (Climate Change) Transition plan for climate change mitigation	18
	2.2.4 Actions and resources related to pollution	32
	3.1.6 (Own workforce) Diversity, Equity & Inclusion	38
	3.2.5 (Workers in the Value Chain) Actions, resources and targets related to value chain workers	44
	3.4.3 Data privacy and protection (Actions and resources)	50

## RISK MANAGEMENT AND INTERNAL CONTROLS OVER SUSTAINABILITY REPORTING

The company conducts structured, extensive and cyclical risk management assessments on a semi-annual basis.

The process begins with objective setting, derived from the group-wide strategy and business plans. These objectives form the foundation for identifying risks that could hinder their achievement. Risk identification and evaluation is conducted systematically by risk owners, and a score is assigned based on a given risk's potential impact and likelihood. The prioritization of risks is then determined by this score, ensuring that resources are properly allocated to addressing the most critical risks to the business. These thorough bi-annual evaluations result in comprehensive reporting that is presented to both the Management Board and the Audit Committee. The reports provide a detailed view of the current risk environment, identifying key risks, evaluating their potential impact, and outlining possible mitigation strategies.

This approach allows leadership to make well-informed strategic decisions, ensuring that they fully understand the trade-offs between potential risks and the opportunities available. The insights from these assessments serve as a foundation for strategic discussions, allowing the company to weigh various factors and pursue decisions that strike a balance between risk and reward. By maintaining a robust system of regular updates, assessments, and reports, the Audit Committee and Management Board members are able to oversee and guide the company's strategy, ensuring that all major decisions take into account the risks, opportunities, and necessary trade-offs.

Flix's global risk management process follows the COSO II framework and involves a continuous cycle of the following steps:

1. Objective setting: Business objectives are defined through the company's strategy and business plans, providing a basis for identifying risks.
2. Risk identification: Risks are identified semi-annually or as needed, documenting current and future risks that may affect business objectives.
3. Risk assessment: Risks are assessed on both a gross and net basis to evaluate the effectiveness of mitigation measures.
4. Risk responses: Risk owners implement mitigation measures to manage risks within tolerable levels.
5. Control activities: Ongoing control activities ensure the continuous application of the risk management process.
6. Risk reporting: Semi-annual reporting keeps management informed of risk exposure and response activities.

This integrated risk management approach ensures that all significant risks are identified, assessed and managed in alignment with the company's objectives, enabling informed decision-making. The scope of our risk management process also includes sustainability risks, which have been integrated into the overall global risk management framework since 2022. As part of this integration, we assess and manage ESG-related risks alongside traditional business risks to ensure a comprehensive approach to risk mitigation.

The main risks identified are related to ensuring compliance with the Corporate Sustainability Reporting Directive (CSRD) and ESG regulations. We view full compliance as crucial, as non-compliance could lead to significant consequences – including legal sanctions, financial impacts, reputational damage, and the deterioration of relationships with partners, customers, and investors. To mitigate the risk of non-compliance, we have established a dedicated team working in parallel with auditors to ensure adherence to regulatory requirements and transparency in our sustainability practices. At the same time, another key risk is the failure to achieve decarbonization targets and SBTi commitments, which could undermine our credibility with stakeholders and have strategic repercussions on our market position. To address this, we have set up a dedicated task force aimed at transforming our fleet in line with our publicly committed climate goals, reinforcing our dedication to sustainability and the energy transition.

Flix Group has standardized its Internal Control System (ICS) to ensure compliance with accounting principles and accurate financial reporting, based on the internationally recognized COSO II framework. The ICS is rolled out globally on a risk-based approach, continuously updated, and integrated into the financial and accounting processes. In addition, our Internal Audit function provides independent assessments of the quality and effectiveness of internal controls, risk management, and governance systems. This helps protect the company's value, solvency, and reputation. Internal Audit personnel focus on evaluating process efficiency, compliance with laws and regulations, the reliability of financial data, and asset integrity.

In 2024, the need to establish an Internal Control System (ICS) related to sustainability at Flix Group was recognized and

is currently slated for 2025. This will further ensure a smooth and robust reporting process, reducing the risk of material misstatement on issues related to sustainability. Furthermore, the findings from our DMA risk assessments will also be carefully integrated into relevant internal functions and processes. When risks identified through the DMA are deemed relevant to the company's strategic, operational, compliance or financial objectives, they are incorporated into the Enterprise Risk Management (ERM) framework and assessed accordingly. For each identified risk, mitigation measures will be defined and incorporated into the relevant processes, ensuring sustainability-related risks are effectively managed and the company's sustainability reporting process is aligned with our internal controls and risk management practices.

The Audit Committee receives quarterly updates on the status of the company's risk management and internal control systems, providing them with detailed information on any risks or changes to the control framework. These updates are vital for maintaining an ongoing awareness of the risk landscape and ensuring that the company's strategies align with its risk tolerance.

## ➤ 1.4 Impacts, risks and opportunities

In 2024, Flix conducted its first Double Materiality Assessment (DMA) in line with European Financial Reporting Advisory Group (EFRAG) prescribed guidelines, replacing the GRI methodology that was followed in the previous reporting years. The primary difference between these methodologies includes the consideration of financial materiality in addition to impact materiality. The initial materiality analysis was performed on an Impact, Risk, and Opportunity (IRO) level. When determining the topics and defining the associated IROs, the ESRS sub-topics as well as the contents of the sub-sub-topics were considered. Resulting from this, the materiality analysis of Flix was conducted for all the topics and sub-topics prescribed by ESRS.

The Flix double materiality analysis in 2024 included a 5-step process consisting of:

1. ESRS topic determination,
2. stakeholder and value chain analysis,
3. IRO identification,
4. measuring impact and financial materiality
5. validation of DMA results.

First, the pre-defined ESRS topics<sup>3</sup> and existing company specific topics were considered to define potentially material topics. The second step in the DMA process was to identify key stakeholders for each of these topics - both affected stakeholders across the value chain as well as users of sustainability information. Internal proxies for each of these interest groups were mapped to participate in the DMA process. After the initial IRO identification, the IROs were assessed quantitatively to measure and rank impact materiality and financial materiality, based on the input from stakeholders. The results were validated by regional stakeholders representing Flix across local regions and were further consolidated and evaluated to identify key material issues. As part of the DMA tool, the identified risk or opportunity was also mapped to the related impacts and the related dependencies on strategy implementation, technologies or those actions of those value chain players.

## Assessing impact and financial materiality

During the impact and financial materiality procedures, the initial assessment was conducted by topical experts from the perspective of the affected stakeholders, followed by validation from functional experts considering the perspective of users of sustainability information.

For all the impacts that were identified, impact materiality assessment was performed to determine if they were significant actual or potential impacts of the company on people and environment across short, medium and/or long term. When assessing actual impact, a probability of 100% was used to indicate loss of opportunity to influence the likelihood.

For all the risks and opportunities that were identified, financial materiality assessment was performed to determine if there were to be significant negative or positive financial impact on the company. While the risk analysis was conducted

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<sup>3</sup> Environmental: Climate Change, Pollution, Water and marine resources, Biodiversity and ecosystems; Social: Circular economy, Own workforce, Employees in the value chain, Affected communities, Consumers and end-Users; Governance: Business Conduct.

by the risk owners themselves, Flix's internal risk management team was involved to align loss volume estimates intervals and other determinants, where necessary, to Flix's existing risk universe. The gross component of the risks was assessed.

## Threshold used

The severity of the impacts was calculated by aggregating the scale, scope and irremediability of the impact, while the impact materiality of the topics was calculated by multiplying the severity of the impact with the likelihood of the occurrence. Irremediability of impacts were only accounted into the assessment of negative impacts, not for positive impacts. Impacts were assessed as material if they yielded a materiality score relevant to *important*, *significant* or *critical* (with a score of 8 or above) on the impact materiality threshold.

The magnitude of financial effects was ranked based on the potential amount of financial loss or gain (in millions of Euros), while the financial materiality of the topics was calculated by multiplying the magnitude of the financial effects to their likelihood of occurrence (measured by assigning factor to probability values). Financial risks and opportunities were assessed as material if they yielded a materiality score relevant to *important*, *significant* or *critical* (with a score between 3 to 5) on the financial materiality threshold.

For a list of all material ESRS topics and their page reference across the report, please refer to the ESRS Content Index in the Annexures section of the report.

## 2. Environmental Information

### 2.1 Climate Change

#### 2.1.1 Interests and views of stakeholders

Flix engages a diverse range of stakeholders on the issue of climate change:

1. **Business Partners (train, bus, service providers, suppliers):** Regular interactions through calls, emails, meetings, and events to discuss updates and negotiate terms.
2. **Employees and Job Applicants:** Internal communication via intranet, newsletters, training, and events. Employees are surveyed for satisfaction, and job applicants are engaged via LinkedIn, career websites, podcasts, and channel for raising questions available in the ESG Report.
3. **Customers:** Feedback is collected through after-ride surveys and standardized questionnaires, alongside reports on customer needs and perceptions.
4. **Press and Media:** Communication includes press releases, social media updates, digital or in-person press conferences, phone calls, and emails.
5. **Civil Society and NGOs:** Periodic interaction through emails, calls, and meetings, as well as participation in workshops or policy events.
6. **City/Municipality:** Engagement via emails, official letters, calls, and meetings; occasional participation in workshops or policy events.
7. **Auditors and Certifiers:** Compliance is ensured through process walkthroughs, documentation, and recommendations for improvement in standards, laws, and internal controls.
8. **Trade Associations:** Regular interaction via emails, calls, meetings, events, and access to member pages for information sharing.
9. **Research, Science, and Analysts:** Engaged through emails, calls, and meetings to discuss findings and analyses.
10. **Investors, Insurances, and Creditors:** Investors and banks are provided with timely and accurate financial and non-financial data, while regular meetings and negotiations address updates and queries. Insurance claims are managed through events and business updates.
11. **Strategic Project Partners (e.g., OEMs):** Collaborations are maintained through regular meetings, workshops, and fairs.
12. **Competitors:** Sporadic informal meetings are held to share best practices and discuss tool usage.



## 2.1.2 Material IROs and their interaction with strategy and business model

### E1 Material impact, risk or opportunities

#### E1.1: Climate Change adaptation

Negative impact	Environmental degradation and potential harm for people (especially employees and workers in the value chain) as a result of unmanaged physical consequences of climate change (e.g. environmental disasters like floods, forest fires, hurricanes)
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#### E1.2: Climate Change mitigation

Positive impact	Replacing the driving fleet combined with new driving technologies may have the biggest potential to lower the carbon footprint and may be demanded by society. Also, traffic congestion on the roads can be reduced, with fewer individual passenger cars.
Negative impact	Heavy vehicles like buses, when using fossil fuels, contributes to GHG emissions.
Negative impact	Contribution to global warming/climate crisis through emissions from the production of the buses.
Negative impact	Emissions from office buildings and other assets.
Positive impact	Continuously engaging with suppliers (bus / train suppliers, bus and infrastructure managers) on the need for GHG emissions reduction, Flix is contributing to the wider sustainability transition of the industry and the collective effort to reduce global warming.
Positive impact	Reduction of greenhouse gas emissions by raising employee / business partners / customer awareness of climate change, Flix's ESG strategy, training on the importance of sustainable action, etc.
Risk	Emissions from heavy vehicles (buses) and the uncertainty of technology and willingness of OEMs to invest in long distance market alternative drives can pose a risk for Flix business model and might decrease access to finance possibilities.
Risk	Failure to achieve validated SBTi targets or other ESG (strategic) initiatives that Flix previously committed to on time can lead to reputational damage and strategic setbacks.
Opportunity	EU-wide and state-level regulations – as well as relevant funding schemes and subsidies of alternative fuels and drive technologies – can increase the opportunities for more pilots and partnerships and increase business opportunities in general.
Opportunity	By leading the transition to a net-zero fleet through new technologies, actively collaborating with partners, and testing alternative fuels and drive systems, Flix can enhance its reputation, gain a commercial edge, and grow its market share.

#### E1.3: Energy

Positive impact	Installing smart meters at Flix's office buildings, energy consumption can be monitored immediately, and measures can be directly implemented, thus leading to a decrease in CO <sub>2</sub> emissions.
Positive impact	By strengthening energy efficiency and switching to renewable energy, energy consumption can be lowered, reducing the risk of potential energy shortages in the respective regions, and climate impacts of energy use can as well be reduced.
Negative impact	Use of fuels for vehicle fleets + transportation (buses and trains) based on fossil energy sources.
Opportunity	Operational energy efficiency (e.g. through upgrading our algorithms or AI models used for predicting how full a bus will be) helps Flix to reduce operating costs.

## CURRENT AND ANTICIPATED EFFECTS OF MATERIAL IROs RELATED TO CLIMATE CHANGE AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

Flix operates within a rapidly evolving transportation sector that presents both risks—such as regulatory pressures, rising fuel costs, and the impacts of climate change—and opportunities, including growing demand for sustainable mobility, the shift to electrification, and advancements in digital innovation. These IROs span the short to long term and affect the entire value chain, from fuel suppliers and OEMs to bus partners and end customers.

The transition to a low-emission fleet has direct implications for Flix's operational and financial models. Adopting alternative drive technologies requires comprehensive adjustments across the value chain, including new supplier partnerships, investments in infrastructure, and changes in operational processes. Regulatory requirements and rising customer expectations for sustainable travel are shaping decision-making and driving the prioritization of low-carbon services. Flix also contributes to the broader transition by decarbonizing its fleet, raising awareness of climate change among employees, partners, and customers, and implementing environmentally friendly measures at its offices and facilities.

To manage these IROs, Flix has outlined ambitions and targets in its ESG Strategy, with a strong focus on fleet transformation, energy efficiency, and renewable energy sourcing.

The material impacts are linked to two core elements: our business model, which includes a business partnership model and an ownership model – as well as our fleet transformation strategy.

Accordingly, these impacts primarily stem from our own operations under the ownership model, and through business relationships with mobility partners under the partnership model.

## INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES

While Flix has not yet incorporated climate-related metrics into the compensation of its Management and Supervisory Boards, this is under consideration for reassessment in the near future.

### 2.1.3 Policies related to climate change

Flix has established an environmental policy that identifies specific goals and actions aimed at mitigating environmental impacts, addressing climate risks, and seizing related opportunities. The policy focuses on climate change mitigation, energy efficiency, the use of renewable energy, and fleet decarbonization, while excluding standard activities such as algorithmic optimization for operational efficiency. Applicable across all geographies and entities, the policy is overseen by the Management Board, with the ESG Team responsible for operational implementation. The policy aligns with international frameworks such as the SBTi for emissions reduction, the Task Force on Climate-Related Financial Disclosures (TCFD) for climate risk management, and the ESRS. Key areas include GHG emissions reduction through the fleet transformation plan, integration of climate risks into strategic planning, energy efficiency measures (innovative technologies, route optimization, and driver training), the use of renewable energy, and partnerships with suppliers to decarbonize charging and refuelling infrastructure. Additional priorities include resource efficiency, customer engagement for sustainable travel options, control of pollutants, and the adoption of circular economy principles. Monitoring is carried out through annual KPIs and sustainability report, with periodic reviews to ensure the policy's relevance. Published on the Flix intranet and shared with partners, the policy requires them to acknowledge its principles as part of the Business Partner Code of Conduct, thus ensuring the integration of sustainability throughout the value chain.

### 2.1.4 Transition plan for climate change mitigation

Flix has aligned with the Paris Agreement and committed to near-term, company-wide emission reduction targets validated by the Science Based Targets initiative (SBTi) in April 2024:

- › Scope 1 & 2 Targets: Reduce absolute emissions by 54.6% by 2032 (base year: 2019).
- › Scope 3 Targets: Reduce emissions intensity (Category 11 - Use of Sold Products) per passenger kilometer by 40.9% by 2032 (base year: 2019).

Based on its business model, Flix transition plan does not foresee material investments and funding. Flix's strategy is mainly based on partnerships and engagement with suppliers, bus partners, and the wider ecosystem.

While a holistic climate change mitigation transition plan is under development, Flix has defined two reduction strategies focusing on two main decarbonization levers:

- › Fleet decarbonization;
- › Increasing renewable energy use in offices.

At the moment, fleet decarbonization has the greatest potential for achieving a significant drop in the emissions we generate via our business partners – which is why we have built a dedicated task force focused on it. The task force's aim is to work as the “engine” to drive fleet transformation, adapt processes and optimize commercial setups.

## **FLEET TRANSFORMATION WITH ALTERNATIVE DRIVES: ADVANCING THE FUTURE OF SUSTAINABLE TRAVEL**

With a long-term innovation focus, Flix' fleet transformation centres on the growing adoption of alternative fuels and new drive technologies. This helps reduce the negative environmental impacts caused by the transportation industry and meet society's growing demand for meaningful action against climate change. By focusing on long-distance testing of scalable alternative driving methods, Flix is contributing to the creation of a more sustainable transportation system. As one of the first providers to test diverse alternative drives and fuels in long-distance bus operations and having initiated several partnerships to further enhance their application in its daily operations, Flix aspires to lead and accelerate technical innovation with OEMs while enhancing the industry through smart, tech-enabled network planning.

Fleet transformation is a key pillar in our climate strategy, involving the piloting of various technologies and alternative drives in collaboration with partners worldwide. Flix' partnerships encompass different dimensions and involve suppliers, bus partners, and the wider industrial ecosystem.

Through consistent engagement with manufacturers in the value chain, Flix plays an active role in advancing the industry's broader sustainability transition. Flix collaborates with its bus partners on route management and leasing arrangements. The company also aims to leverage its network of partners to support a broader shift – expanding charging infrastructure and improving access to low-carbon fuels.

Since our business model does not foresee the acquisition of buses, capital expenditures (CapEx) are generally not applicable. There might be a few exceptions, such as the purchase of 14 LNG buses for a pilot program in 2024. Operational expenses (OpEx) primarily relate to the employees working on the fleet transformation effort.

The Fleet Transformation team plans and manages the rollout of decarbonization initiatives, aligned with SBTi targets, while the ESG Strategy team defines the overarching climate strategy and related objectives. In 2024, we implemented a tool to improve emissions forecasting based on our evolving fleet composition. As Flix evolves alongside rapidly advancing technologies, we recognize that both our emissions trajectory and our targets may need to be adjusted over time.

The fleet composition strategy is reviewed annually and shared with a dedicated Steering Committee, composed, among others, by the Management Team, to ensure alignment with business strategy and financial planning.

We acknowledge that various incentives and funding sources may be essential to supporting the success of our fleet transformation strategy. To address this, we are committed to developing solutions that help external stakeholders overcome the financial challenges associated with fleet transformation. Furthermore, we actively seek new funding opportunities for fleet transformation and closely monitor emerging legislation—such as fuel taxes, urban access restrictions for heavy-duty vehicles, and new procurement mandates for operators—that could impact our operations. Public funding will be critical to accelerating the path to carbon-neutral mobility through fleet transformation and is therefore a key focus of Flix's policy and advocacy efforts.<sup>4</sup>

Since 2018, Flix has built a robust list of strategic partnerships to support and advance this transformation.

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<sup>4</sup> More information on our Political Engagement approach is available in the chapter 4.1.5 – Political Engagement.

## PARTNERSHIP PROJECTS

- › 2018: The world's first electric long-distance buses run in France and Germany.
- › 2020: The world's first long-distance bus with solar panels.
- › 2021: Flix's first long-distance biogas-powered buses run in Benelux & Scandinavia.
- › 2022: Three solar panels buses running in Spain in partnership with Trailar and two in the DACH region in partnership with Green Energy. Two biodiesel buses in France are running on the Brest-Grenoble line using rapeseed biofuel Oleo100.
  - Flix ran the first international electric bus pilot in U.S./Canadian history.
  - between Seattle, Washington and Vancouver, British Columbia.
- › 2023: Two more buses with solar panels started operating on international lines connecting Milan with Marseille and Munich.
- › 2024:
  - Electric-bus pilots launched in Europe (Portugal and UK) and Latin America (Chile).
  - Bio-LNG fleet began operating in Europe.
  - Diesel buses started refuelling with HVO in France and Italy.

Our alternative drives fleet with nearly 90 buses on the roads during 2024 has contributed to an overall savings of 3,951 tons of CO<sub>2</sub>e compared to standard diesel buses. While this may represent a small reduction relative to the scope of the global climate crisis, we believe that it is already a recognition of the efforts we are implementing together with our partners in testing and scaling alternative driving solutions, aimed at achieving a more sustainable transportation industry.

At the end of 2024, our Scope 3.11 emissions intensity was 29.4 grams of CO<sub>2</sub>e per passenger-kilometer, representing a slight increase of 6% compared to the previous year, and of 3% compared to 2019. While alternative drives helped limit emissions from the fleet, a slight decrease in overall load factor (approximately 2%) contributed to the rise in emissions intensity compared to last year. Our decarbonization trajectory in these starting years is quite flat due to the natural timing required to change the composition of the fleet, as well as the launch of new markets. The expected positive outcomes of our pilots, the infrastructures enhancement and their availability in our markets, the industrialization of zero emission technologies and fuels will play a key role in the successful achievement of our carbon reduction objectives in the upcoming years.

### Methodology

*The saving of 3,951 tons of CO<sub>2</sub>e has been calculated comparing the emissions generated by the usage of alternative drives versus to the amount emissions eventually arising from Flix diesel buses, using the average emission factors of the specific region where the bus is operating.*

## RENEWABLE ENERGY PROCUREMENT AND SUSTAINABLE BUILDING MANAGEMENT

Among Flix's levers for sustainable operations is energy management, encompassing both energy efficiency and the transition to renewable energy sources, helping to reduce the negative climate-related impacts associated with our operations.

Flix headquarters in Munich transitioned to renewable energy in 2021, earning LEED (Leadership in Energy and Environmental Design) Gold certification from the U.S. Green Building Council for its environmentally friendly practices. In 2023, Flix's Berlin employees moved to a new coworking space featuring with LED lighting and smart lighting controls which adjust usage based on schedules, occupancy, and natural daylight. Furthermore, Berlin and Lisbon offices procure 100% of their electricity from renewable energy, while in Sofia this figure exceeds 70%.

We promote the adoption of sustainable buildings aligned with the highest environmental and inclusive design standards. For this reason, in 2024 we drafted and shared a set of environmental guidelines with our facility managers across countries, inspired by LEED principles and circular economy practices, which include:

- › Eco-efficient and resilient buildings: We prioritize structures powered by renewable energy, with documented proof from landlords. Buildings with a low risk of physical impacts from climate change (e.g., floods, wildfires, hurricanes) are preferred, along with those incorporating adaptation solutions like green roofs, advanced insulation, and rainwater management systems.
- › Location and transportation: We encourage site selection that minimizes environmental impact and maximizes connectivity. Priorities include access to quality transit (metro, tram, bus), bicycle facilities, reduced car parking footprints, and the provision of Electric Vehicles charging stations to promote sustainable mobility.
- › Circular Economy principles: We ensure buildings support waste recycling and adhere to the waste hierarchy principle: prevent, reuse, recycle, recover, dispose.
- › Accessibility: Facilities must be accessible to individuals with disabilities, promoting inclusive design and equitable use for all.
- › Building management systems and reporting: Whenever possible, we advocate for systems that track energy consumption, waste, and other sustainability metrics to foster continuous improvement.
- › Energy use: We emphasize flexibility in energy management by collaborating with landlords to allow renewable energy procurement. This may include selecting energy providers that offer green energy options.
- › Building and environment: As a practical “hack” for sustainability, we consider the construction date of buildings, particularly within the EU, where all new buildings from 2021 must be nearly zero-energy buildings under stringent regulations.

Through these principles, we aim to ensure our facilities align with our sustainability goals, supporting environmental responsibility, occupant well-being, and long-term resilience. Since we do not own our office facilities, CapEx figures related to these actions are not relevant. OpEx mainly consists of the budget allocated for procuring electricity from renewable sources.

FlixTrain Germany temporarily switched from green electricity to a mixed energy source in 2023–2024 (comprising 49.1% renewables in 2024) due to soaring energy prices. However, we are resuming procurement of 100% renewable electricity as of January 2025.

At the end of 2024, our Scope 1 and 2 emissions totalled 180,927 tons of CO<sub>2</sub>e, marking a 26% reduction compared to the 2019 baseline. This achievement was largely driven by a decrease in the number of company-owned buses (impacting Scope 1) and the growing adoption of electricity sourced from renewables.

## CLIMATE RISK MANAGEMENT

In 2022, in line with the recommendations of the TCFD, Flix conducted an initial quantitative and qualitative climate scenario analysis to assess key climate risks and opportunities and derive short- to long-term impacts on its business. The outcomes of the climate scenario analysis were integrated into the Company’s risk universe and have laid the foundation for Flix decarbonization strategy, risk mitigation measures and its commitment to SBTi-aligned targets.<sup>5</sup>

During this process, potential locked-in GHG emissions associated with Flix business model were considered. Within Flix operations, the primary sources of locked-in GHG emissions are linked to its fleet of buses and associated infrastructure, including owned and long-term leased vehicles as well as refuelling and charging stations. These locked-in emissions could jeopardize the achievement of Flix GHG emission reduction targets, particularly in the context of a rapid transition to low-carbon transportation systems. However, to mitigate this risk, Flix has deployed a climate strategy to manage its GHG-intensive assets. Some key measures are:

- › Phased decommissioning of older, less efficient vehicles, replacing them with advanced, low- or zero-emission technologies. (Avoid)
- › Gradual transition to alternative driven vehicles (Reduce)
- › Partnerships with renewable energy providers to decarbonize the associated charging and refuelling infrastructure. (Engage)

<sup>5</sup> For further details, please refer to Flix’s 2022 Sustainability Report, pages 23 to 25.

## 2.1.5 Metrics related to climate change

Energy consumption and mix <sup>6</sup> (MWh)	Total	Facilities	Car Fleet	Owned Buses	Train
(1) Fuel consumption from coal and coal products	-	-	-	-	-
(2) Fuel consumption from crude oil and petroleum products	600,783.7	-	4,859.6	595,915.8	-
(3) Fuel consumption from natural gas	134.2	134.2	595,915.8	-	-
(4) Fuel consumption from other fossil sources	-	-	-	-	-
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources	40,708.2	17,652.9	-	-	23,055.3
(6) Total fossil energy consumption (calculated as the sum of lines 1 to 5)	641,626.1	17,787.1	4,859.6	595,915.8	23,055.3
Share of fossil sources in total energy consumption (%)	96.5	96.3	100.0	100.0	50.9
7) Consumption from nuclear sources	-	-	-	-	-
Share of consumption from nuclear sources in total energy consumption (%)	-	-	-	-	-
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, bio-gas, renewable hydrogen, etc.)	-	-	-	-	-
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	22,930 <sup>7</sup>	690.1	-	-	22,240.0
(10) The consumption of self-generated non-fuel renewable energy	-	-	-	-	-
(11) Total renewable energy consumption (calculated as the sum of lines 8 to 10)	22,930.0	690.1	-	-	22,240.0
Share of renewable sources in total energy consumption (%)	3.5	3.7	-	-	49.1
Total energy consumption (calculated as the sum of lines 6, and 11)	664,556.1	18,477.2	4,859.6	595,915.8	45,295.2

<sup>6</sup> Electricity and District Heating consumption has been assessed as fossil where data was unknown, adopting a cautionary approach. For more information regarding the accounting and estimation methodology, refer to the Methodology paragraph following Emissions and targets per Scope (E1-6) table.

<sup>7</sup> Purchased electricity related to unbundled energy attribute claims, on the basis of the contractual agreements with the landlords.

Energy intensity per net revenue	2024	
Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors (MWh/m €)	297.3	
Net revenue from activities in high climate impact sectors used to calculate energy intensity (m €)	2,235.4	
GHG Emissions per Scope (tCO <sub>2</sub> eq)	2024	2023
Scope 1 GHG Emissions		
Gross Scope 1 GHG emissions	154,741.8	143,628.2
Scope 2 GHG Emissions		
Gross location-based Scope 2 GHG emissions	26,185.7	28,804.3
Gross market-based Scope 2 GHG emissions	23,913.7	-
Scope 3 GHG Emissions		
Total Gross indirect (Scope 3) GHG emissions	998,685.2	909,081.1
of which use of sold product	771,683.3	708,924.0
Total GHG Emissions		
<b>Total GHG Emissions (location-based)</b>	<b>1,179,612.7</b>	<b>1,081,513.6</b>
<b>Total GHG Emissions (market-based)</b>	<b>1,177,340.7</b>	<b>-</b>

Percentage of Scope 3 GHG emissions calculated using primary data obtained from suppliers or other upstream or downstream value chain partners	2024
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Percentage of Scope 3 GHG emissions calculated using primary data obtained from suppliers or other upstream or downstream value chain partners (%)	Not Available <sup>8</sup>
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Emission intensity per net revenue <sup>9</sup>	2024
Emissions intensity per net revenue - Location based (tCO <sub>2</sub> e/€)	527.7
Emissions intensity per net revenue - Location based (tCO <sub>2</sub> e/€) - EU	228.8
Emissions intensity per net revenue - Location based (tCO <sub>2</sub> e/€) - NA <sup>10</sup>	98.8
Emissions intensity per net revenue - Location based (tCO <sub>2</sub> e/€) - RoW <sup>11</sup>	115.8
Emissions intensity per net revenue - Market based (tCO <sub>2</sub> e/€)	526.7
Emissions intensity per net revenue - market based (tCO <sub>2</sub> e/€) - EU	227.8
Emissions intensity per net revenue - market based (tCO <sub>2</sub> e/€) - NA	98.8
Emissions intensity per net revenue - market based (tCO <sub>2</sub> e/€) - RoW	115.8
Net revenue from activities in high climate impact sectors used to calculate energy intensity (m €)	2,235.4

Carbon Credits cancelled in the reporting year <sup>12</sup>	2024
Total (tCO <sub>2</sub> eq)	7,060
Share from removal projects (%)	-
Share from reduction projects (%)	100
Recognized quality standard 1: Gold Standard (%)	100
Share from projects within the EU (%)	-
Share of carbon credits that qualify as corresponding adjustments (%)	100

<sup>8</sup> While a quantitative figure cannot be provided due to an insufficient level of quantitative data quality, Flix has partially used data coming from upstream part of the value chain, for accounting the emissions arising energy consumption in its premises (Scope 2), mainly obtained from the landlords/managers of the buildings rented, and downstream part for alternative drives. A quantitative figure is not reported to avoid compromising the principle of data quality (Scope 3.11) obtained from bus and strategic partners, business travel (Scope 3.6) obtained from booking service platforms.

<sup>9</sup> Values for EU, NA, Rest of the World have been calculated including Scope 1, 2, and Scope 3.4 and 11.

<sup>10</sup> NA: North America.

<sup>11</sup> RoW- Rest of the world.

<sup>12</sup> Carbon credits cancellation corresponding to Flix business travel emissions have not been included within this calculation as they had not been offset yet at the time of report publication.



Emissions and targets per Scope (tCO <sub>2</sub> eq) <sup>13</sup>	2024
Gross Scope 1 GHG emissions - Total	154,741.8
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	-
Gross Scope 1 GHG emissions - Facilities	27.2
Gross Scope 1 GHG emissions - Facilities per Region (Europe)	-
Gross Scope 1 GHG emissions - Facilities per Region (North America)	-
Gross Scope 1 GHG emissions - Facilities per Region (RoW)	27.2
Gross Scope 1 GHG emissions - Fleet	154,714.6
Gross Scope 1 GHG emissions - Fleet per Region (Europe)	-
Gross Scope 1 GHG emissions - Fleet per Region (North America)	111,212.6
Gross Scope 1 GHG emissions - Fleet per Region (RoW)	43,502.0
Gross location-based Scope 2 GHG emissions	26,185.7
Gross location-based Scope 2 GHG emissions - Facilities	6,799.3
Gross location-based Scope 2 GHG emissions - Facilities per Region (Europe)	883.6
Gross location-based Scope 2 GHG emissions - Facilities per Region (North America)	5,357.5
Gross location-based Scope 2 GHG emissions - Facilities per Region (RoW)	558.3
Gross location-based Scope 2 GHG emissions - Train	19,386.4
Gross market-based Scope 2 GHG emissions	23,913.7
Gross market-based Scope 2 GHG emissions - Facilities	6,553.1
Gross market-based Scope 2 GHG emissions - Facilities per Region (Europe)	637.4
Gross market-based Scope 2 GHG emissions - Facilities per Region (North America)	5,357.5
Gross market-based Scope 2 GHG emissions - Facilities per Region (RoW)	558.3
Gross market-based Scope 2 GHG emissions - Train	17,360.6
Total Gross indirect (Scope 3) GHG emissions	998,685.2
Purchased goods and services	179,965.1
Capital goods	394.2
Fuel and energy-related activities (not included in scope 1 and 2) _ Total	38,743.7
Fuel and energy-related activities (not included in scope 1 and 2) per Region (Europe)	4,987.5
Fuel and energy-related activities (not included in scope 1 and 2) per Region (North America)	25,509.0

<sup>13</sup> Unit of measure is tons of CO<sub>2</sub>eq, unless otherwise specified. Fugitive emissions arising from our bus, mainly from our mobile air conditioning units, have been assessed and are equal to 222 tons CO<sub>2</sub>e for Scope 1 (0.1%) and 1,130 tons for Scope 3 (0.2%). More details are provided in the methodological note below.

Fuel and energy-related activities (not included in scope 1 and 2) per Region (RoW)	8,247.2
Upstream transportation and distribution	-
Waste generated in operations	766.3
Business traveling	669.7
Employee commuting	6,462.9
Upstream leased assets	-
Downstream transportation	-
Processing of sold products	-
Use of sold product_Total	771,683.3
Use of sold product per Region (Europe)	486,308.4
Use of sold product per Region (North America)	78,880.4
Use of sold product per Region (RoW)	206,494.5
End-of-life treatment of sold products	-
Downstream leased assets	-
Franchises	-
Investments	-
<b>Total GHG Emissions (location-based)</b>	<b>1,179,612.7</b>
<b>Total GHG Emissions (market-based)</b>	<b>1,177,340.7</b>

## Methodology

Our GHG Inventory of Scope 1, Scope 2 and Scope 3 classes of greenhouse gas emissions have been prepared in accordance with "The Greenhouse Gas Protocol: A Corporate, Accounting and Reporting Standard (Revised Edition, 2004)". The perimeter consolidates all the emissions of the entities for which we have operational control and matches the perimeter of our Financial Statement. The emissions arising from entities in the segment "Group functions" (Flix SE, Flix Bulgaria EOOD, FlixMobility Experience GmbH, FlixMobility Tech GmbH, FLIXMOBILITY TECH UKRAINE LLC), where relevant, have been accounted in Europe segment. The unit of measure of our GHG inventory is CO<sub>2</sub>e, including CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, SF<sub>6</sub> and NF<sub>3</sub>, while excluding HFCs and PFCs. Data from the previous year has not been provided due to the adoption of the new methodology based on ESRS E1-6. We used the most recent Global Warming Potential (GWP) values published by the IPCC based on a 100-year time horizon to calculate CO<sub>2</sub>eq emissions of non-CO<sub>2</sub> gases. The main sources of our emissions and the related emission factors applied to our GHG Inventory are reported below:

- *Scope 1: Emissions arising from the fuel consumed in our Türkiye office and from the combustion of the fuel for our car (Türkiye) and bus fleet (Türkiye and NA, only owned buses). Fugitive emissions arising from our bus, mainly refrigerant gas leakages from our mobile air conditioning units, have been assessed and are equal to 222 tons CO<sub>2</sub>e. Bus fleet fuel consumption intensity based on internal Flix data. Emissions factors sources include EEA, EPA, DBEIS, JRC; No material biogenic emissions have been identified;*
- *Scope 2: Emissions arising from the purchased electricity and district heating for Flix offices, shops, terminals and train. Punctual data have been obtained for our main corporate offices, including Munich, Berlin, Milan (electricity), Sofia, Lisbon, Warsaw, and for Turkish premises. NA premises consumption has been estimated on the basis of monthly average*

consumption per square meters of the top 5 main buildings. For the remaining premises (EU minor offices, shops and RoW premises) we applied national averages (electricity consumption per employees and heating consumption per m<sup>2</sup> are collected from Odysee Mure).

- Train electricity consumption includes punctual data for the first nine months of the year and planned consumption for the remaining three months. Also, it does not include FlixTrain in Sweden, since the train stopped its service in January 2024. For market-based methodology, contractual agreements on energy mix for electricity and district heating with landlords for Munich and for electricity only for Berlin, Sofia and Lisbon offices, together with train electricity provider have been taken into account, applying supplier specific factors to the amount of energy consumed. Location-based emissions are calculated by multiplying electricity consumption with country-specific electricity grid emission factors and district heating consumption with district heating grid emission factors where available.
- Emissions factors sources: EEA, EPA, DBEIS, FEDENE, IEA, IPCC, JRC, Base Empreinte, IDEMAT, Indian Gov., Mexican Gov., AIB; No material biogenic emissions have been identified;
- Scope 3.1: Emissions from purchased goods and services are calculated using the spend-based approach and include all the expenditures of the Group, apart from the ones related to activities whose emissions are already accounted in other Scopes (e.g. rental costs, fuel and energy related, business travels); Emission Factor source: Exiobase;
- Scope 3.2: Emissions from capital goods are calculated using the spend-based approach and include additions to Property, Plants and equipment; Emission Factor source: Exiobase;
- Scope 3.3: Emissions from fuel and energy related activities, including the indirect emissions associated with the Well-To-Tank portion of our owned fleet and with the production, transmission, and delivery of fuels and energy purchased and accounted for in Scope 2 emissions. Emissions factors sources: DBEIS, IDEMAT;
- Scope 3.5: Emissions from waste management in operations, calculated on the basis of the national averages and the presence of our employees in our premises; National average sources: ABS, BLS, EPA, Eurostat, MDPI, Research Gate, World Bank;
- Scope 3.6: Emissions from Business Travel include Flight, Car and Rail and are calculated using the GHG Protocol methodology, taking into account the trip details, where available, or the reimbursement offered to our employees. Since some trips are not self-organized by the employees without using our booking platforms, some trips are excluded by the calculation. Emissions arising from Hotel accommodation have been excluded since they are not required by the GHG Protocol. Since we offset the emissions from our business travel, these emissions have been accounted by our partner atmosfair, who adopts the VDR methodology for the offsetting purpose (more conservative) of Flight travel category. Full methodology is available here: [www.atmosfair.de/en/CO2-bilanz\\_fuer\\_unternehmen](http://www.atmosfair.de/en/CO2-bilanz_fuer_unternehmen).
- Scope 3.7: Emissions from employees commuting, calculated using national averages and our employees presence in the premises; National average sources: Amoes, Carbon Trust, Census, Destatis, Eurostat, UK Gov., itstillruns, OECD, APTA, Moovit, Odysee Mure;
- Scope 3.11: Emissions arising from the use of sold products including the Well-To-Wheel emissions of the fleet of our bus partners. They are estimated applying regional emission factors, which take into account an average fuel consumption intensity of the bus per region, to the kilometres driven. Alternative drives have also been accounted, on the basis of the GHG savings information provided by our partners. In case of usage of buses fuelled with HVO and BioLNG, the corresponding CO<sub>2</sub>e emissions savings have been accounted for, including from carbon capture and replacement. Biogenic emissions, originating from natural carbon cycles and released when organic materials like plants, wood, and agricultural residues decompose or are burned, account for 247 tons CO<sub>2</sub>e (Well-to-Wheel) and refer to liquified biomethane used for fueling our Bio-LNG buses in BeNeLux and Dach region. Sources are IPCC, Ecoinvent, DBEIS, EPA, GLEC, JRC. Fugitive emissions arising from our bus partners, mainly refrigerant gas leakages from mobile air conditioning units, have been assessed and are equal to 1,130 tons.
- The remaining categories of Scope 3, for which a value equal to 0 has been inserted in the table, are considered not material for Flix, in line with the SBTi commitment undertaken. Please refer to SBTi Targets paragraph for more information.

## AVOIDED EMISSIONS

Although our services inevitably generate emissions, when customers choose to travel with Flix, they choose it as an alternative to other, often more carbon-intensive, modes of transport: on a per passenger-kilometre basis, a Flix coach in Europe emits at least five times less CO<sub>2</sub> emissions than private cars and at least ten times less CO<sub>2</sub> emissions than flights, performing nearly as good as intercity trains<sup>14</sup>. By assessing the emissions our customers avoid by choosing Flix over other alternatives, we aim to measure Flix's real-world impact as a sustainable travel option.

For several years now, Flix has been calculating the emissions avoided by customers choosing FlixBus or FlixTrain over alternative modes of transport. This calculation followed the World Business Council for Sustainable Development (WBCSD) guidelines and utilized data from post-ride customer surveys, operational metrics (e.g., bus kilometres, passenger kilometres), and emission factors from the [2021 Well-to-Wheel analysis](#).

Flix acknowledges challenges in establishing reliable counterfactual scenarios, including low survey response rates and incomplete fuel consumption data from bus partners. To ensure credibility, the company applied conservative approaches and accounted for potential rebound effects. Our methodology was reviewed and approved by a third-party assurance company in 2023.

In 2024, we updated our analysis using the same methodology and updated data.<sup>15</sup> The result showed that, by choosing Flix services over alternative modes, passengers could avoid nearly 1.5 million tons of CO<sub>2</sub> in 2024 globally.

### Methodology

*Although global methodologies for avoided emissions calculations are still evolving, Flix is committed to improving transparency, data quality, and collaboration with stakeholders to enhance its methodology. For more information, refer to the [Flix 2024 Avoided Emissions Methodology](#).*

## 2.1.6 Targets related to climate change

### CLIMATE CHANGE RELATED TARGETS

At the Group level, Flix is charting a pathway toward net-zero emissions in alignment with the Paris Agreement. This effort is supported by strategic collaborations and advancements in fleet transformation. In 2023, the Company committed to setting near-term, science-based emission reduction targets through the SBTi. Specifically, the Company aims to achieve a 54.6% reduction in absolute Scope 1 and 2 emissions by 2032, using 2019 as the baseline year, and to decrease Scope 3 emissions (Category 11 – Use of Sold Products) per passenger-kilometre by 40.9% within the same period. These targets were successfully validated by SBTi in April 2024.

Reduction strategies focus on two main decarbonization levers:

- › Fleet decarbonization
- › Increasing renewable energy use in offices.

In this context, Flix also plans to work with additional suppliers to increase the proportion of renewable energy across all its facilities to 80% by 2025 and to achieve 100% by 2030 for new contracts of Flix entities in Europe, excluding co-working spaces. As we expand our global footprint, we aim to adopt best-available market practices in facility management across all countries. For this reason, we have shared a dedicated factsheet with a list of environmental standards.

### SBTi TARGETS

In terms of scope, at the time of target submissions (March 2024) we included the emissions from all subsidiaries and joint ventures in our inventory, in accordance with the operational control approach we selected. As reported in the GHG

<sup>14</sup> Data stemming from own calculation, atmosfair analysis, UBA 2023, US EPA 2024. For more information, refer to [Flix's Avoided Emissions Methodology 2024](#).

<sup>15</sup> Since the methodology adopted is the same as last year, no additional third-party assurance was obtained.

inventory section, our scopes include<sup>16</sup>:

- Scope 1: Facilities: Direct emissions from heating for all offices (except the ones with district heating) and terminals operated by Flix; Vehicles: Tank-to-wheel emissions of buses, shuttles and company cars owned and operated by Flix.
- Scope 2: Indirect emissions from electricity usage for all Flix offices and terminals; Indirect emissions from district heating; Indirect emissions from electricity for trains.
- Scope 3: Categories:
  - Scope 3.1 Purchased Goods and Services
  - Scope 3.2 Capital Goods
  - Scope 3.3 Fuel- and Energy-related Activities
  - Scope 3.5 Waste in Operations
  - Scope 3.6 Business Travel
  - Scope 3.7 Employee Commuting
  - Scope 3.11 Use of Sold Products
  - Scope 3.13 Downstream Leased Assets
  - Scope 3.15 Investments.

Across our value chain, both upstream and downstream stakeholders are reflected in our targets. In particular, the target on Scope 3.11 category includes a significant involvement of our bus partners.

Flix is committed to reviewing, and if necessary, recalculating and revalidating our targets to ensure alignment with the latest climate science and best practices. This will occur at least every five years or in the event of major changes (e.g., new geographies or significant business model shifts).

For targets on Scope 1 and 2, Flix has used “Absolute contraction method” established by SBTi, adopting SBTi Science-based Target Setting Tool (Version 2.1). For target on Scope 3: Flix adopted Sectoral Decarbonization Approach: Passenger transport emissions (Passenger – Buses) established by SBTi. Flix used Sectoral Decarbonization Approach – Transport Tool (Version 1.1.1, Feb 23).<sup>17</sup>

Since the targets were validated by SBTi, we assess them as based on conclusive scientific evidence. Stakeholders were not involved in the process of target setting. Committing to SBTi demonstrates that the targets take into account stakeholders’ interests.

2019 was considered a reliable timeline for setting the base year, for the following reasons:

- Activities covered: The baseline reflects core operational activities related to energy consumption and GHG emissions and accurately represents our business model during that period. It also retroactively includes data from Greyhound (based on its annual reports), covering all Flix geographies except for those launched after 2024. 2019 was a relatively stable year compared to 2020 and 2021, which were significantly impacted by the COVID-19 pandemic. As such, 2019 provides a more reliable baseline.

The baseline was validated by SBTi.

Flix has developed an internal tool to monitor how fleet composition will impact our emissions reduction trajectory. Within this tool, we aim to anticipate future developments – such as changes in kilometres driven, total cost of ownership of buses, and emerging technologies – to optimize our fleet composition strategy.

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<sup>16</sup> Greenhouse gases excluded from the inventory (and targets) were: HFC and PFC. Also, fugitive emissions from refrigerant systems (cooling system and air conditioning) of buses and offices are not included (Scopes 1 & 3.11 in minor %). Furthermore, emissions from the well to tank portion of emissions in scope 3 (categories 6 and 7). These were excluded from the initial Scope mapping since they were not material.

The resulting exclusions resulted in the following weights:

- 0.5 % excluded from scope 1
- 0 % excluded from scope 2
- 0.5 % excluded from scopes 1 and 2 combined
- 0.3 % excluded from scope 3 total.

<sup>17</sup> Please refer to SBTi tool for all information about assumption, scenarios and data sources.

## 2.1.7 GHG removals and GHG mitigation projects financed through carbon credits

Having set net zero targets, we aim to achieve approximately 90-95% GHG emission reductions in alignment with recognized sector-specific decarbonization pathways. In this context, we are actively monitoring market developments with our partners in carbon neutralization solutions. This will help us identify and implement the most effective and sustainable solutions for addressing residual emissions across both our operations and the broader value chain.

Furthermore, we have been collaborating with the environmental NGO, atmosfair, for nine years to provide our customers with the option to offset the estimated CO<sub>2</sub> emissions of their journey with a voluntary donation, upholding the highest offsetting standard certified by the UN and Gold Standard. Our customers can offset their travel emissions by supporting a high-quality emissions reduction project, certified under the Clean Development Mechanism (CDM), in partnership with atmosfair.<sup>18</sup>

Since 2017, Flix passengers have offset a total of 108,075 tonnes of CO<sub>2</sub> through the Rwanda efficient cookstoves project. Detailed information, including certification and verification documents, can be accessed via the publicly available Gold Standard registry, as well as the Authorization Letter from Rwanda which confirms that double counting risks have been addressed.<sup>19</sup>

Flix and atmosfair established a 75/25 mechanism for customers' climate contribution. 75% of customers' voluntary donation goes into atmosfair's Rwanda project to fully offset their trip emissions, 25% flows into the Future of Mobility Fund, set up by Flix and atmosfair to develop mobility solutions aimed at enhancing more sustainable travel for people in their local communities and the regions where Flix operates.

These projects are selected based on their transformational character and emission reduction potential, with social inclusion aspects also playing a key role. Since 2016, the Fund has pioneered the first long-distance electric coach in Germany, deployed 2 biogas-powered coaches in the Benelux region and Scandinavia, put on the road 10 solar-equipped coaches across 5 countries, and supported research on a state-of-the-art fuel cell technology to launch hydrogen-powered long-distance coaches.

In the terms of social impact, the Fund has donated 200 bicycles to Ukrainian refugees in Poland in cooperation with Warsaw-based NGO Green Masovia; provided 16 cargo bikes to 5 different social organizations including Foodsharing e.V., Tafel and Caritas in 11 cities across Germany and 2 cities in Austria; and financed the installation of a solar PV system and a plug-in hybrid car for the SOS Children's Village in Sarajevo, Bosnia and Herzegovina.

These initiatives reflect our commitment to offering solutions that support climate action while upholding the integrity of our climate strategy and reduction targets. While this doesn't represent a means of direct emissions reduction, it enables our customers to contribute to climate change mitigation.<sup>20</sup>

In addition, we offset all employee business travel emissions globally in partnership with atmosfair, as reported in our annual carbon accounting.<sup>21</sup>

## 2.2 Pollution

### 2.2.1 Interests and views of stakeholders

The range of stakeholders corresponds to the same range of stakeholders mentioned in the Climate Change section.

<sup>18</sup> Currently, all carbon credits associated with this project are verified exclusively under the Gold Standard, ensuring their credibility and alignment with high-quality standards.

<sup>19</sup> Certification documents for PoA: <https://registry.goldstandard.org/projects/details/18> (or <https://assurance-platform.goldstandard.org/project-documents/GS1023>). Component Project Activities (CPAs): <https://registry.goldstandard.org/projects/details/728>. While the CDM is no longer operative, the project is in the process of transitioning to the new UN mechanism under Article 6.4, which is not yet fully operational. The credits meet stringent quality requirements and are "Authorised for Compliance / Any NDC," indicating that they have received a Letter of Assurance and Authorization from the responsible Ministry in Rwanda. This letter states that the certified emission reductions will not be used for the achievement of the Nationally Determined Contributions (NDC) of Rwanda. Therefore, it is ensured that the achieved emission reductions are only claimed once.

<sup>20</sup> A full description of our approach to customers' emission offset is available at the following link: <https://global.flixbus.com/company/sustainability/planet>.

<sup>21</sup> The accounting of the business travel emissions for the purpose of the offset is managed by atmosfair, adopting the VDR methodology. The Carbon Footprint of Flix follows the GHG Protocol methodology instead, in line with ESRS E1-6 requirements.

## 2.2.2 Material IROs and their interaction with strategy and business model

### E2 Material impact, risk or opportunities

#### E2.1: Pollution (air, water, soil, living organisms and food resources)

Positive impact	Deploying clean energy powered vehicles like electric vehicles can help reducing air pollution.
Negative impact	Operations linked to Flix' business model led to soil pollution due to extraction of raw material to manufacture various parts of buses and trains.
Negative impact	Operations in terms of Flix's business model led to pollution of the environment (air, water and soil) and health (also food resources) of people and ecosystems (living organisms in general) due to emissions (not CO <sub>2</sub> ) and leaks from e.g. traffic/vehicles and breaks of the trains.
Opportunity	Reputational enhancement by working on the development of buses with alternative drives in Europe and globally, reducing pollution to air, water and soil.

#### E2.2: Microplastics

Negative impact	Plastic used in manufacturing various components of buses and trains like tires & brake system indirectly affect environment.
Negative impact	Release of microplastic particles through tire abrasion from buses on the roads into the environment with potentially serious consequences for biodiversity and natural resources.

### CURRENT AND ANTICIPATED EFFECTS OF MATERIAL IROs RELATED TO POLLUTION AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

The material impacts originate from and are connected to:

- › our business model, which includes both a business partnership model and an ownership model
- › the fleet transformation strategy.

Accordingly, the impacts mainly arise from our activities under the ownership model, and via partner operations under the business partnership model. Furthermore, some negative impacts arise from upstream supply chain actors, manufacturers of various components of buses and trains like tires and brake system can have indirect environmental impacts.

Current and anticipated effects of pollution-related IROs are mostly linked to regulatory changes and shifting consumer preferences. New regulations introducing stricter limits on engines, tires and microplastic are expected in the next years. Flix is addressing these IROs as part of its broader fleet transformation strategy. New technologies designed to reduce CO<sub>2</sub> emissions may also lead to reductions in other pollutants, such as PM10.

Flix is aware that microplastics represent a rising issue. Emerging technologies may also help OEMs design tires and components that emit fewer microplastics, contributing to long-term environmental improvement.

## 2.2.3 Policies related to pollution

Flix has established a *Global Environmental Policy* with specific goals and actions aimed at mitigating environmental impacts, addressing risks, and seizing opportunities. The policy covers not only climate change mitigation, but also other non-GHG pollutants and microplastics. Please refer to Climate Change section above for more information.

## 2.2.4 Actions and resources related to pollution

Flix implements two main action areas to manage pollution related IROs:

- › Fleet decarbonization - Actions implemented to decarbonize the fleet, in line with the latest industry standards, will also contribute to pollution reduction. Refer to 'Climate Change' section for further information.
- › Regarding microplastics, Flix does not yet have a dedicated action plan, as we are currently strictly dependent on the availability of new materials and production technologies that can reduce or replace plastic components – largely influenced by OEM decision-making. Flix is actively engaging in discussions at the European level, through industry associations, to support the adoption and scaling of these technologies.

## 2.2.5 Metrics related to pollution

Microplastics (kg)	Own fleet Scope 1	Bus partner fleet Scope 3
Generated	7,261.4	14,132.6
Used	-	-

### Methodology

Since Transport industry is not listed among the Activities in the Annex I of the Regulation (EC) No 166/2006 (European Pollutant Release and Transfer Register - E-PRTR Regulation), to which the ESRS E2 refers to, the disclosure of the Pollutants above threshold emitted by the company is not applicable to Flix. For microplastics generated, PM10 emissions from tire and brake wear were included, with the microplastic share calculated from literature. Oil spills were excluded as these are managed per legal requirements.

The emission factors used for microplastics generation estimation may vary by 10% due to differences in operating conditions and vehicle specifications compared to the studies referenced. Full references are available as follows:

Microplastics (tire wear)	no range	Umweltbundesamt (UBA), 2022. "Abrasive Emissions from Road Vehicles: Tyre and Brake Wear."
Microplastics (brake wear)	no range	
Microplastics (% microplastic)	0.0032-0.0478	European Environment Agency (EEA), 2020. "Non-exhaust PM Emissions: An Overview of Emission Estimates, Relevance, Trends, and Policies."

## 2.2.6 Targets related to pollution

Flix does not have specific targets on pollution in place. However, our fleet decarbonization targets are expected to positively impact our performance by reducing pollutant emissions.



# 3. Social Information

## > 3.1 Own Workforce

### 3.1.1 Interests and views of stakeholders

Regarding our own workforce, the various stakeholders relevant to Flix in terms of impact and financial materiality include employees, job applicants, the broader talent market (including competitors), customers, business partners, management, board members and investors.

### 3.1.2 Material IROs and their interaction with strategy and business model

#### S1 Material impact, risk or opportunities

##### S1.1: Working conditions

Positive impact	Permanent employment creates stability and workplace security (financial independence) for Flix's own workforce.
Negative impact	Health hazards (including accidents, illness and fatalities) due to a lack of proper health and safety protection.
Negative impact	In case of inadequate wages, dissatisfaction and higher turnover may raise among employees.
Positive impact	Regular and constructive dialogue between employees and management fosters mutual understanding and boosts morale.
Positive impact	Offering flexible working hours and locations supports a healthy work-life balance.
Positive impact	Employee health and safety measures reduce injuries and enhance the physical and mental well-being of employees.
Positive impact	Flix can contribute to job creation in the regions where it operates.

##### S1.2: Equal treatment and opportunities for all

Positive impact	Promoting a non-discriminatory environment, social inclusion, and equal opportunity supports the well-being of employees.
Positive impact	Supporting relocation efforts for employees, including those from vulnerable communities.
Negative impact	Inequitable treatment in promotions, pay, or leadership opportunities (e.g., hiring only one demographic into senior roles) can lead to lower morale and a decline in performance.
Positive impact	Training and development builds expertise and skills and increase employees' satisfaction at work.
Negative impact	A lack of training and development leads to employee dissatisfaction and lower workforce morale.

### S1.3: Other work-related rights

Positive impact	Transparent communication and responsible handling of applicant and employee data strengthen trust among current and potential employees.
Negative impact	Personal data breaches or violations of data protection principles (e.g., data minimization, purpose limitation, or data subject rights) can result in serious infringements of employee rights.
Risk	Reputational damage, regulatory fines and loss of sales resulting from violations of employees' data rights or non-compliance with data protection laws (e.g. data minimization, purpose limitation, storage limitation) and obligations (e.g. data subject rights).

Not all material IROs identified were directly linked to the strategy and business model in the double materiality assessment. The three IROs that showed clear links include:

- › A potential negative impact from health hazards due to insufficient health and safety protections, particularly relevant as the business expands into regions with lower safety standards
- › An actual positive impact from job creation by Flix, aligned with our continuous expansion into new markets as a key strategic pillar
- › A potential negative impact from the violation of personal rights, particularly in cases involving loss of employee personal data or non-compliance with data protection obligations. This is strategically relevant as Flix, as a B2C tech company, relies on collecting and managing personal data.

All material impacts related to our own workforce have been identified as relevant across short-, medium-, and long-term time horizons. The only exception is training and development impacts, which are expected to materialize primarily in the medium term (1–5 years).

Flix's workforce is broadly divided into two categories: office-based employees, and field workers (including drivers, crew, shop, terminal and station workers). Drivers and crew are mainly employed in regions where Flix operates under an ownership model, such as North America, Türkiye, and Germany (train operations).

Key negative impacts related to our own workforce include insufficient health and safety protections, inadequate wages, unequal employee treatment, limited access to training and development, and potential violation of individuals' personal data rights.

Business activities that generate positive impacts for Flix office-based employees include providing permanent employment opportunities, maintaining regular and constructive dialogue between workforce and management, offering flexible working hours and work locations, providing effective health, safety and well-being measures, creating jobs in the regions that it operates in, providing a non-discriminatory and socially inclusive work environment that provides equal opportunities, supporting employees with relocations, providing training and development opportunities, and ensuring transparent and responsible data handling. These activities primarily benefit Flix office-based employees, and in some cases, prospective hires. Health and safety measures taken by Flix are especially relevant to the field workers employed by Flix (including bus drivers, crew, shop, terminal and station workers) and third-party bus partners.

At Flix, we do not have any material risk of child labour or forced labour identified for our own workforce employees and non-employees.<sup>22</sup>

### 3.1.3 Engaging with own workforce and worker representatives

Key sources for understanding employee interests and perspectives include: a monthly confidential employee satisfaction survey, anonymous AskMeAnything Q&A sessions, insights from People Partners and employee resource groups (ERGs), and ongoing discussions with employee representative groups. The monthly surveys feature questions designed to capture drivers of employee satisfaction and perspectives relevant to material IROs.

<sup>22</sup> Flix has no impacts, risks or opportunities deriving from entity-specific disclosures related to own workforce.

In December 2024, our employee engagement score was 37 eNPS, with an 82% aggregated participation. This score was 13 points above the tech industry average.

There are various employee representative groups at Flix including:

- › **Flix Team Board (FTB):** A legally required representative body for international, cross-border matters, which has been an essential part of Flix's conversion to an SE (Societas Europaea, or European Stock Corporation). The FTB specifically focuses on international matters that have a significant impact on all employees at Flix and that are relevant in at least two Flix countries, i.e. any topic that is considered significant to Flix Group and that impacts employees in at least two countries. The FTB is therefore provided with information and consultation rights. The Management Board informs and consults the FTB in regular meetings on the business situation and prospects of Flix as well as on the main issues dealt with by the supervisory board. Furthermore, the FTB can initiate a conversation with management for matters within its area of competence and receives the agendas of all supervisory board meetings, as well as all documents provided to shareholders during the annual shareholders meeting.
- › **Trust Council:** A German-based voluntary representative body that acts as the interface between employees from German-based entities. It collects employee feedback and provides suggestions to internal functions such as HR, legal, facility managements, as well as the Senior Management. Its core mission is to foster an open, inclusive work environment where employees feel empowered to influence Flix's future.
- › **FMX Works Council:** A Berlin-based body that is responsible for Flix Mobility Experience employees and represents the interests of employees towards management. The FMX Works Council is subject to German legal regulations (BetrVG = Betriebsverfassungsgesetz) and is elected every four years.
- › **Vertrauensrat Train:** A German-based voluntary representative body which is responsible for the workforce of the train crew of FlixTrain GmbH. It collects crew feedback and shares suggestions with internal departments such as HR, legal, facility management, and Senior Management. Its goal is to support a positive work environment where train crew can voice concerns and help shape the company's future.
- › **Works Council France:** A legal body representing employees of the Flixbus France SARL entity. It communicates employee interests to the local management and is subject to French legal regulations (from article L-2311-1 to article L2317-2). It is elected every four years.

### 3.1.4 Characteristics of our workforce

#### POLICIES

There are various Flix policies that shape the working conditions of Flix workforce:

- › **People Code of Conduct:** This is the overarching people policy that all Flix employees must comply with and may impose standards exceeding those required by applicable law. This policy covers a broad range of topics, including workplace safety, sustainability, anti-discrimination and harassment, conflict of interest, anti-money laundering, competition and anti-trust and human rights.
- › **Global Hybrid Working Guidelines:** This policy provides guidance for flexible hybrid work arrangements across the company.
- › **Work from (M)anywhere Policy:** Flix offers employees the opportunity to work in a flexible manner temporarily from a country not specified in their employment contract. This policy is designed to support employee well-being by offering a structured framework and centrally managed process for short-term international remote work.
- › **Global Conflict of Interest Policy:** This policy outlines Flix's standards and procedures for identifying and managing actual, potential or perceived conflicts of interest. This policy aims to ensure all decisions are made free from undue influence and provides mechanisms for disclosure and approval where a conflict of interest cannot be avoided.
- › **Global Anti-Bribery, Anti-Corruption and Anti-Fraud Policy:** This policy sets out guidelines to counter fraud, bribery and corruption.

## METRICS

Employees by geographical area	2024
Europe	1,791
North America	2,320
Rest of the world	1,479
<b>Total Employees</b>	<b>5,590</b>

### Methodology

The number of employees (excluding contingent workers) are based on data from HR systems at year-end and is accounted for in Headcount.

Gender breakdown of employees	2024
Male	3,926
Female	1,626
Others	34
Not reported	4
<b>Total Employees</b>	<b>5,590</b>

### Methodology

The headcount by gender is based on employee data stored in our internal HR systems. We analyse the data split by biological sex at group level. Currently, Flix does not differentiate between gender as a social construct vs biological sex within internal data systems.

Countries with significant employment (headcount)	2024
US	2,133
Türkiye	1,385
Germany	1,194

### Methodology

The geographic distribution of employees is determined by aggregating the total headcount in each country and applying a threshold which have either greater than or equal to 10% of total employees and a minimum of 50 employees.

Employees by contract type	Male	Female	Others	Not Reported	Total
No. of permanent employees	1,021	713	-	4	1,738
No. of temporary employees	68	73	-	-	141
No. of non-guaranteed hours employees	4	2	-	-	6
<b>Total Employees</b>	<b>1,093</b>	<b>788</b>	<b>-</b>	<b>4</b>	<b>1,885</b>

#### Methodology

The employee breakdown above does not include Greyhound and Kâmil Koç employees.

Flix employee turnover	2024
Total number of employees that left Flix	344
Employee turnover rate	18.3%

#### Methodology

Absolute turnover is reported at whole Flix Group level based on headcount data. Turnover data is sourced solely from Flix HR system and reflects only permanent employees with unlimited contracts, as other employee types (such as interns, working students, temporary/ fixed-term workers) hired with predetermined end dates. Turnover rate has been measured across the entire reporting period, with a denominator that indicates the average headcount accounting for the various fluctuations coming from new hires, leavers, rehires, etc. All other headcount KPIs do not account for fluctuations during the year as they were taken as of 31.12.2024.

### 3.1.5 Collective bargaining coverage and social dialogue

As outlined above, Flix has various employee representative groups (especially in Germany), with whom it facilitates social dialogue and enters into collective bargaining agreements.

#### METRICS

As per ESRS reporting requirements, the metric below only accounts for collective bargaining agreements and social dialogue within the European Economic Area (EEA) region.

	Collective Bargaining Agreement	Social Dialogue
Coverage Rate	Employees - EEA (for countries with >50 employees representing at least 10% of total employment)	Workplace representation - EEA Only (for countries with >50 employees representing at least 10% of total employment)
0-19%	n/a	n/a
20-39%	n/a	n/a
40-59%	n/a	n/a

60-79%	n/a	n/a
80-100%	Germany	Germany

### Methodology

The coverage of collective bargaining agreements is determined by summing the number of employees covered in each EEA country, excluding contingent workers, and dividing this total by the number of employees covered by collective bargaining in that country. This result is then assessed against the significant employment criteria, which require more than 50 employees and at least 10% of the total workforce.

## 3.1.6 Diversity, Equity & Inclusion

At Flix, we are dedicated to establishing and preserving a supportive and inclusive culture throughout the organization. We recognize that the diverse backgrounds, talents, and perspectives of our employees are central to shaping our culture and success.

### POLICIES

Flix's *Diversity, Equity and Inclusion (DEI)* policy reinforces our commitment to ensuring equal treatment for all employees, regardless of background, identity, or any other protected characteristic. We are opposed to all forms of unlawful and unfair discrimination.

### REMEDIATING NEGATIVE IMPACTS

Serious breaches of the *People Code of Conduct* or the DEI policy can be raised to our People Partners, or through our employee whistleblower platform. Any report on the platform triggers a formal incident investigation – leading to appropriate mitigation and/or remedial actions if necessary.

### ACTIONS AND RESOURCES

Flix integrates DEI elements into key employee touchpoints, including employer branding, standardized recruitment processes, employee events, leadership development courses, and ongoing monitoring of factors such as pay equity and promotion fairness. Additionally, Flix supports the development of ERGs, employee-led communities that foster connection, growth, advocacy, and awareness.

ERGs receive an annual budget to support a variety of initiatives, including hosting expert-led sessions on relevant topics, organizing on-site gatherings to foster team connections, collaborating with Facility Management to enhance workplace inclusivity, and partnering with other departments to advocate for their community's interests, among other activities.

The main target group is employees who identify with or support the community, though some events are open to all employees. The scope is either global (when done online) or linked to specific offices where ERG members are located. ERG executive sponsors advocate for each community's priorities, while the People team works to connect ERGs with relevant stakeholders.

### METRICS

Gender distribution at top management level	Head Count	Percentage
Male	105	77.8%
Female	27	20.0%
Others	-	-

Not reported	3	2.2%
<b>Total Employees at top management level</b>	<b>135</b>	<b>100%</b>

### Methodology

Top management refers to the management board and two levels below, including C-level, VPs, Directors, Division Leads, Managing Directors, etc. Currently, Flix does not differentiate between gender as a social construct vs biological sex within internal data systems. Gender distribution is based on data stored in our HR systems as of 31-12-2024.

Age distribution of employees	Head Count	Percentage
Employees under 30 years old	1,198	21.4%
Employees between 30 and 50 years old	2,806	50.2%
Employees over 50 years old	1,586	28.4%
<b>Total Employees</b>	<b>5,590</b>	<b>100%</b>

### Methodology

Age distribution is based on data stored in our HR systems as of 31-12-2024.

## 3.1.7 Adequate Wages

Flix adheres to compensation bands that are benchmarked against peer companies, and which are above the minimum wage requirements of each country of operation. All Flix employees are hired at or above the applicable legal minimum wage.

## 3.1.8 Health & Safety

Flix's workplace and accident management is segmented across various parts of the business, based on the country of operations and based on the type of employment (office-based employees vs field workers including drivers, crew, stewards, station, terminal and Flix shop personnel). Flix has an established Safety Management System (SMS) that provides a structured management approach to control safety risks in operations by clearly defining goals for the SMS, implementing formal processes to assess and manage risk, monitoring safety standards and defining clear escalation paths, while reinforcing the role of safety in our corporate culture. The SMS applies to the entire Group, while partially applies to FlixTrain, Greyhound and Kâmil Koç. The most senior level accountable for the implementation of the policy is the Senior Director Safety & Traffic Management, reporting to our COO.

Operational safety is our top priority and takes precedence over economic, ecological, operational or social interests. It is our goal to continuously develop our strategies, processes and procedures so that the highest possible safety standards are upheld at Flix at all times. The company is committed to providing sufficient and appropriate resources for this purpose. Managers and employees, as well as our partners, share responsibility for actively engaging in the Safety Management System (SMS).

In concrete terms, we expect managers and process managers to do the following:

- continuously promote participation in the Safety Management System (SMS) among all employees, demonstrate their own engagement, and reinforce the importance of the safety policy;
- ensure that operational activities are always guided by safety considerations;
- proactively identify hazards, assess associated risks, and take appropriate measures to develop, implement, and regularly review mitigation strategies and related documentation;

- › comply with all relevant laws and applicable industry standards;
- › allocate sufficient and appropriate resources—both in quality and quantity—to support safety objectives;
- › define and communicate safety and security goals, set performance standards, and track progress using appropriate metrics.

## POLICIES

The SMS consists of concrete safety guidelines covering several areas: safe crew, safe vehicle, safe processes, safe company, safe environment. SMS guidelines are available on Flix intranet.

## ENGAGING WITH STAKEHOLDERS AND REMEDIATING NEGATIVE IMPACTS

Flix SMS is aimed at preventing accidents and improving the physical, mental, and emotional well-being of employees, drivers and customers. Flix also has a crisis management system in place – based on recognized global standards – designed to manage incidents and minimize occupational health and safety risks related to business operations.

This includes setting clear SMS goals, implementing formal risk management processes, monitoring safety standards, establishing escalation protocols, and cultivating a safety-centric corporate culture. All operational employees are informed about the safety management system and are expected to prioritize operational safety in all activities. We encourage every employee to report any observed incidents, hazards, or safety concerns to the SMS. Each new employee completes an online course on occupational health and safety as part of their onboarding at Flix. Additionally, we perform quarterly Flix Safety events or lessons (e.g. intranet articles) to raise awareness, reinforce reporting procedures, and ensure all employees understand what and how to report. In our regular Transport Manager jour fixes, we share the most interesting cases with all country organizations to highlight lessons learned, avoid making the same mistakes on other projects, and raise safety awareness in general.

In 2024, the safety management team had implemented several technical and operational solutions to tackling road safety for drivers, crew as well as for passengers. Key initiatives included a cross-functional project called 'Buckle Up' which highlighted the importance and legal obligations of wearing seatbelts for both drivers and passengers. The initiative also included various nudges for customers including multilingual on-board announcements, in-app FAQ notification, as well as equipping seats with seatbelt stickers across our buses in the DACH region.

## METRICS

Work-related injuries are an important indicator and are therefore closely monitored, with stringent protocols in place. Our Safety department has developed a dashboard to collect key metrics. Internal and external benchmarking activities help Flix continuously improve its safety performance. Health risks of drivers at Greyhound and Kâmil Koç are continuously mitigated through compliance with driving regulations and fatigue monitoring.

Flix uses the Risk Assessment Score methodology developed at EU level to assess fleet safety by analysing rest and driving times of the drivers. The final score for this year was 84, which assesses Flix as a low-risk transportation company.

Health & Safety Metrics	Office-based employees & other facilities	Bus drivers, crew and stewards
Percentage of employees covered by health & safety management system	100%	100%
Number of work-related injuries	7	292
Rate of work-related injuries	0.7 per million working hours	0.27 per million driven kms



## Methodology

Health and safety coverage KPI is based on input from the HR, Health and Safety, and Facility Management teams of local entities. The total equals 100% since all Flix employees are automatically included in the health and safety coverage system.

Work-related injuries are defined by ESRS as work-related injury or ill-health resulting to

- death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, or loss of consciousness; or
- significant injury or ill health diagnosed by a physician or other licensed healthcare professional, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness.

Rate of recordable work-related injuries for office-based employees is calculated by dividing the respective number of cases by the total number of hours worked by Flix own workforce (which is estimated based on internal assumptions) and multiplied by one million.

Rate of recordable work-related injuries for bus drivers and crew members is calculated by dividing the respective number of cases by the total number of kilometres driven and multiplied by one million.

## TARGETS

Flix has no specific targets regarding safety, but rather strives to continuously enhance safety protocols, set new benchmarks, and position itself among the companies with the highest levels of safety worldwide. The effectiveness of Flix policies and actions is measured via looking at indicators gathered internally. Safety metrics are benchmarked internally (among regions and business partners) and externally (vs. peers).

## 3.1.9 Remuneration

Flix's remuneration practices and policies are established using local market practices, country-specific statutory requirements and external market benchmarks. These are operationalized through local HR teams who are responsible for the local administration and execution.

## METRICS

Remuneration Metrics	2024
Gender Pay Gap (Uncontrolled)	19.5%
Gender Pay Gap (Controlled)	3.0%
Annual Total Remuneration Ratio	11.6

## Methodology

The uncontrolled gender pay gap is calculated by subtracting the average gross hourly pay of female employees from the average gross hourly pay of male employees, then dividing the result by the gross hourly pay of male employees and multiplying by 100. This calculation is in alignment with ESRS disclosure requirements. However, internally at Flix, the gender pay gap KPI is calculated based on median pay controlling for the various objective factors such as job profile, company entity and employment location, so that the comparison is more meaningful.

Annual total remuneration ratio is calculated by dividing highest-earning employee's total annual salary by the median annual salary for employees in Flix, excluding the highest earning employee.

### 3.1.10 Training and skills development

Led by the People & Organizational Development team at Flix, employee development and growth is approached with the 70-20-10 framework:

- 70% learning on the job: which includes clear core competencies and career growth pathways designed for individual job profiles;
- 20% learning from others: which includes mentorship and trainer programs;
- 10% learning from training: which includes dedicated digital learning platform as well as talent programs

Through Flix's annual performance check-in process, employees' job performance and progress are evaluated to help them better increase their impact within the company. Dedicated training is provided to all employees to guide them through each step in the performance review cycle so that the employees are set up for success during the annual review process. Additional training is provided to People leads during the compensation and performance management process to help team members avoid unconscious biases and ensure a standardized process. We also offer numerous job-specific development programs designed to foster the growth and progress of Flix employees of all levels.

Throughout 2024, our employee development programs have experienced remarkable growth in both participation and satisfaction. The focus of the year has been on enhancing Flix competencies across various roles and seniority levels, adopting a long-term Learning & Development approach. In 2024, more than 400 colleagues participated in leadership and coaching programs (reserved for Leadership roles); 87 took part in talent programs (designed for non-leadership employees and future leaders), and 693 joined other organizational wide training offerings (open to everyone). Participation levels increased by 33% year over year, demonstrating our ongoing commitment to employee development.

## ➤ 3.2 Workers in the Value Chain

### 3.2.1 Interests and views of stakeholders

For the value chain workers category, the key stakeholders identified were the bus and train drivers and crew, workers employed by Flix's business partners who work with our bus and train service providers, as well as other external suppliers and facilities workers.

### 3.2.2 Material IROs and their interaction with strategy and business model

#### S2 Material impact, risk or opportunity

##### S2.1: Working conditions

Negative impact	Violation of workers' co-determination rights due to non-existent or limited employee representation, lack of social dialogue or restrictions on freedom of association.
Positive impact	Support worker (i.e. bus and train drivers) health and safety through regular and mandatory breaks and consistent maintenance of trains and buses.
Positive impact	Provide training to bus and train drivers/crew to prevent accidents or other safety-related incidents.
Negative impact	Inadequate pay or suppression of collective bargaining negatively impacts workers' financial well-being and living standards

Negative impact	Exposure to health hazards (e.g., accidents, illness, fatalities) due to missing safety measures, extended working hours, or faulty vehicles.
Opportunity	Fair wages promote organizational stability and reduce turnover rates and turnover-related costs.
S2.2: Equal treatment and opportunities for all	
Negative impact	Discrimination against minorities within the workforce can reduce job satisfaction and overall morale.
Positive impact	Flix promotes diversity, equity, and inclusion, creating fair conditions and helping eliminate workplace and societal discrimination. Employees carry these values into their daily environments.
Positive impact	Flix fosters global diversity, supports flexible work policies, and prioritizes employee well-being and development. Employees are empowered to grow into socially responsible leaders.
Negative impact	Discrimination (e.g., based on disability or protected characteristics) can lead to psychological stress and violations of workers' rights.
Risk	Cases of workplace discrimination may lead to reputational damage, reduced valuation, and lost investor confidence.
Positive impact	A non-discriminatory, inclusive work environment contributes to the well-being of all workers in the value chain.
Positive impact	Training and development initiatives strengthen employee skills and improve workplace satisfaction.
S2.3: Other work-related rights	
Negative impact	Loss or mishandling of employee personal data can constitute a violation of privacy and data protection rights.
Risk	Breaches of data protection may result in reputational harm, regulatory fines, and compensation liabilities.

While Flix is primarily a tech company, it plays a critical role in collaborating with its value chain partners. The impacts and risks related to workers across the value chain are concentrated in the upstream value chain.<sup>23</sup> At Flix, our value chain workers, such as bus drivers employed by our business partners, are essential to our operations. Although these drivers are not directly employed by us, we are committed to ensuring that our value chain reflects our values of fairness, responsibility, and respect for human rights.

### 3.2.3 Policies related to value chain workers

Our approach to value chain workers aligns closely with the principles outlined in the [Business Partner Code of Conduct](#), also detailed in the '3.3 Affected communities' section of this report. This code emphasizes the importance of protecting the rights of workers and fostering responsible business practices, particularly in ways that impact affected communities. By holding our business partners to these standards, we strive to create a positive and ethical working

<sup>23</sup> Flix has no impacts, risks or opportunities deriving from entity-specific disclosures related to value chain workers.

environment that benefits both value chain workers and the communities they serve.

Topics like data privacy and safety, which are crucial for value chain workers, are addressed under the '3.4 Consumers and end-users' section, as they are inherently tied to our consumers. The safety of bus drivers is critical not only for their own well-being but also for ensuring a safe and reliable experience for passengers. Similarly, protecting sensitive data is essential to maintaining trust with both drivers and consumers. These efforts underscore our holistic commitment to the well-being of all our stakeholders.

### 3.2.4 Engaging with value chain workers and remediating negative impacts

Due to the design of our business model, engagement with our value chain workers is primarily conducted through our external bus partners. Nonetheless, Flix is committed to establishing an ethical value chain that encourages fair business conduct from all stakeholders and fosters an open environment for the value chain workers to raise their concerns. Good conduct from our bus partners is necessary for Flix to safeguard the rights of value chain workers. Flix's effective implementation of its Business Partner Code of Conduct, as well as its Business Partner Acquisition Due Diligence process, both play a crucial role in monitoring business partner conduct. For further details, refer to the '4.1.6 Management of relationship with suppliers' section under the Governance information chapter.

For health and safety incidents and data privacy breaches, engagement occurs directly with the affected party. To ensure compliance, we have automated systems in place to monitor document expiration dates and confirm driver authorization to operate under the Flix brand. This keeps our driver database current and enables quick identification of unauthorized drivers. Any incidents, including accidents or data breaches involving drivers or crew, are recorded and escalated to Flix's Safety Team. Driver authorization is linked to internal systems; to maintain their eligibility, drivers must complete an annual safety and emergency refresher training.

All incidents reported through our dedicated whistleblower channel are thoroughly investigated and documented by our Compliance Team.

### 3.2.5 Actions, resources and targets related to value chain workers

#### SUPPLY CHAIN DUE DILIGENCE (LKSG)<sup>24</sup>

At Flix, we implement all requirements of the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG) to fulfil our human rights and environmental due diligence obligations. Through a mandatory comprehensive risk analysis, we have assessed human rights and environmental risks and impacts arising from our business activities across our supply chain. Based on the risk analysis, we have taken various preventive measures including adapting our People Code of Conduct and Business Partner Code of Conduct to align with LkSG requirements, publishing a [Flix Policy Statement](#) and [Flix Rules of Procedure](#) in accordance with LkSG, appointing a Human Rights officer integrating risk-based human rights and environmental considerations into our procurement practices, and incorporating regular training on the supply chain due diligence topics.

Flix is fully compliant with LkSG regulations concerning human rights and environmental due diligence. The complaints procedure is a key component of compliance and aims to identify and eliminate potential grievances. Its objectives include:

- Early warning system: Detecting human rights or environmental risks early to prevent harm.
- Access to remedial measures: Addressing potential infringements promptly if suspicions are confirmed.

Flix has established a complaint system for reporting human rights and environmental risks or violations, whether within its own operations or its supply chain. Stakeholders, including value chain workers, business partners, and suppliers,

<sup>24</sup> LkSG (full name Lieferkettensorgfaltspflichtengesetz) is a German law that entered into force in 2023 which imposes due diligence requirements relative to human rights in the value chain on large companies in Germany.

are encouraged to report concerns about illegal or unethical conduct via the compliance channel. All complaints are treated confidentially, investigated by the Compliance team, and addressed without retaliation. This complaint system includes a structured procedure for handling complaints, which includes the following steps:

1. Confirmation of receipt
2. Review of the report
3. Clarification of facts
4. Development of a solution
5. Implementation of remedial measures
6. Conclusion.

Reports can be submitted via:

➤ Email: [lksg@flixbus.com](mailto:lksg@flixbus.com)

➤ Post: Flix SE, Group Compliance Department, Friedenheimer Brücke 16, 80639 Munich, Germany.

If a violation is identified within Flix's operations or at a direct supplier, remedial actions are taken under the direction of the Human Rights Officer. Flix prioritizes cooperative resolutions but reserves the right to impose sanctions or terminate business relationships in cases of severe violations.

Flix has not yet defined specific quantitative targets for managing negative impacts, enhancing positive outcomes, or addressing material risks and opportunities relating to value chain workers. However, Flix is committed to further engaging with value chain stakeholders to better understand and develop measurable indicators of Flix's impact on them.

## ➤ 3.3 Affected Communities

### 3.3.1 Interests and views of stakeholders

In terms of affected communities, various stakeholders relevant to our business's impact and financial materiality include employees, job applicants, and the broader talent market (including competitors); local communities, civil society; and Management and Board members.

Engagement channels for local communities include corporate emails, calls, meetings. Occasionally, we also interact with communities through public workshops, public policy events and conferences.

### 3.3.2 Material IROs and their interaction with strategy and business model

#### S3 Material impact, risk or opportunities

##### S3.1: Communities' economic, social and cultural rights

Positive impact	Contributing to transportation infrastructure, particularly in underserved or rural areas.
Positive impact	Affordable, collective, and intermodal travel expands mobility access for low-income groups and contributes to social inclusion. It also reduces environmental impacts by discouraging car use and short-haul flights.
Opportunity	Strong data protection builds customer trust, enhancing brand reputation and potentially increasing sales.

##### S3.2: Communities' civil and political rights

Positive impact	Supporting human rights in local communities—especially in labour contexts—by enforcing standards and funding awareness or advocacy initiatives.
Positive impact	Partnering with NGOs and political foundations to support affected populations during crises (e.g., United for Ukraine, Life Bridge Ukraine, Türkiye earthquake response).
Risk	Potential restrictions from transportation policy changes, infrastructure closures, or competition with state incumbents. Additional reputational risks may arise from conflicts with affected groups, such as protests or lawsuits, potentially resulting in fines or reduced earnings.

Flix connects people, cities, and countries via its network and aims to increase travel opportunities for the communities it serves. Granting access to affordable travel has a significant societal impact, as it offers people with small budgets greater travel accessibility. This is particularly important to rural communities, which are often underserved served by other ways of transport, like trains or flights. A high level of data protection helps build trust among potential new customers and may positively influence sales.<sup>25</sup>

Flix can play a role in defending civil and political rights through targeted campaigns supporting refugees during times of conflict, cooperating with NGOs, and promoting the right to vote. Flix is also aware of potential restrictions of its business activities, such as those resulting from transportation policy changes from city authorities, or reputational risks due to conflicts with affected groups like local residents. To reduce these risks and manage network planning accordingly, Flix actively engages early in the process with local authorities.

### 3.3.3 Policies related to affected communities

Flix has established a global Business Partner Code of Conduct to ensure ethical, sustainable, and legally compliant practices across its value chain. This policy applies to all Flix entities and governs relationships with business partners, suppliers, including subcontractors, their employees, and other stakeholders. This Code of Conduct focuses on key areas such as labour rights, anti-discrimination, and legal and ethical compliance. It prohibits forced and child labour, ensures fair treatment, and promotes safe working conditions. Business partners are required to uphold human rights in line with the International Bill of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. By entering a relationship with Flix, business partners acknowledge and commit to these principles. They must ensure their (sub)suppliers adhere to these standards and implement appropriate control mechanisms. The Code of Conduct for Business Partners is publicly available on the Flix [website](#).

In Türkiye specific legal constraints require additional considerations. Turkish law mandates a clear distinction between

<sup>25</sup> More information on Flix approach to data privacy are available in 'Consumers and end-users' chapter.

value chain workers and direct employees. Our local subsidiary in Türkiye, Kâmil Koç and its affiliates, cannot regulate employment terms for value chain workers, including wages and safety conditions, as this could lead to administrative penalties or classification as a principal employer-subcontractor relationship. Instead, Kâmil Koç ensures compliance with local regulations while fostering ethical business practices.

Respect for human rights is integral to Flix's corporate culture. To learn more on how Flix commits to upholding human rights for affected communities, please refer to the 'Supply Chain Due Diligence' sub-section under the '3.2.5 Actions and resources related to value chain workers' section.

### 3.3.4 Engaging with affected communities and remediating negative impacts

Flix is developing a Corporate Citizenship framework for steering Corporate Social Responsibility (CSR) initiatives across different countries. Currently, these activities are managed at the local level, with global functions involved as needed. The engagement with affected communities for CSR initiatives is determined by the nature and scope of a given initiative. Flix interacts with local associations representing cities and communities through one-on-one meetings as appropriate, jointly agreeing on the type of initiative to support or co-develop.

When it comes to remediation, Flix engages directly with affected stakeholders in response to concerns raised or through existing partnerships. For further details on how concerns can be raised by affected community members and the relevant remediation measures will be taken, please refer to the 'Supply Chain Due Diligence' sub-section under the '3.2.5 Actions and resources related to value chain workers' section.

For new lines or stations, engagement with the relevant authorities is conducted prior to launch.<sup>26</sup>

### 3.3.5 Actions, resources and targets related to affected communities

As a globally active company, Flix is committed to social responsibility and ethical behaviour in its operations and supply chains. *Flix's Business Partner Code of Conduct* (under Section 11 – Consequences of Breaching the Code of Conduct), states that in case of serious or repeated violations, Flix is entitled to terminate existing contractual relationships with immediate effect.<sup>27</sup>

No severe human rights violations or related incidents were reported in 2024.

Flix has not established specific quantitative targets related to managing material negative impacts, advancing positive impacts, or addressing material risks and opportunities concerning affected communities. Nonetheless, Flix remains committed to its core purpose of connecting people, cities, and countries—continuing to expand access to travel opportunities for the communities it serves.

## CORPORATE SOCIAL RESPONSIBILITY AT FLIX

Flix understands that its business is bound to affect, to some extent, the communities it connects. While it commits to strict observance of local regulations and the upholding of strong safety and environmental standards to support social well-being in the areas where it operates, Flix is also aware that it can actively pursue value creation for these communities through dedicated initiatives within its citizenship.

These initiatives are initiated and supervised by the local teams and tailored to local contexts, with specific purposes

<sup>26</sup> More information on our approach to political engagement are available in the paragraph "4.1.5.: Political Engagement".

<sup>27</sup> The process for addressing human rights-related concerns raised through reporting channels is outlined in the Supply Chain Due Diligence section under 3.2.5 Actions and resources related to value chain workers.

that vary based on the needs identified within the local communities. Reflecting the diverse range of contexts in which Flix operates, corporate social responsibility initiatives pursued by the Flix teams throughout 2024 spanned a highly diverse range of scopes.

Examples include:

- › In May 2024 Flix donated €30,000 to the *Vereint für Demokratie* fund in Germany. Jointly set up by Berlin-based NGO Project Together and Allianz Foundation, the fund collected more than €2 million from companies, private donors and organizations and distributed the money to around 50 civic organizations that support democracy in Germany.
- › Another important commitment was that of the local teams in Germany and Ukraine, who took part in the *Life Bridge Ukraine* initiative, a joint project of the Kyiv City Administration, the Berlin City Hall and the Life Bridge Ukraine NGO.
- › The initiative involved carrying Ukrainian Defenders with amputation injuries together with Ukrainian prosthetics technicians from Kyiv to Berlin with FlixBus coaches sponsored by the local team. Once in Germany, injured military personnel would get modern prosthetics, while the medical technicians would be trained in Berlin hospital for several months to then work at a new prosthetics center in Kyiv.
- › Two more trips to rehabilitate defenders took place in 2024, the first from Kyiv and the second from Lviv. The local team accompanied passengers and drivers to the border to avoid unforeseen situations.
- › Similarly, the local team in Poland started the *UkraineDesk* initiative on the second anniversary of Russia's invasion, to secure safe and reliable transportation to Ukraine for businesses and media outlets. The project was devised to strengthen international ties, foster economic recovery, and facilitate access to up-to-date travel expertise, ensuring seamless connectivity between Ukraine and the EU. Since its launch, the initiative has predominantly supported humanitarian organizations.
- › The local team in the Czech Republic also participated in various initiatives all along 2024, focused especially on social inclusion. These included sponsoring FlixBus tickets to children from orphanages and disadvantaged families to travel to educational courses (in cooperation with the association Nadání a dovednosti) and bringing together financially and socially disadvantaged single mothers and their children with dedicated excursions (in synergy with Klub svobodných matek).

Flix's positive corporate citizenship and heartfelt social engagement is not limited to Europe.

In Brazil for example, the local team launched a pioneering initiative to reinforce its commitment to diversity and inclusion – in collaboration with Victória Dandara, a transgender woman, lawyer, writer, and human rights activist, Flix developed an awareness program for bus drivers aimed at promoting inclusion, respect, and support for the LGBTQ+ community. The program covers key relevant issues, like how to properly use transgender individuals' identification documents, responding appropriately to incidents of homophobia or harassment, and fundamental concepts related to gender identity and sexuality. This effort was developed in recognition of the significant challenges faced by LGBTQ+ travellers in Brazil, where more than half of the community has experienced discrimination while traveling, and amid a broader lack of sector-wide initiatives addressing these issues.

## › 3.4 Consumers and End-Users

### 3.4.1 Interests and views of stakeholders

As a travel-tech company, Flix has been transforming how individuals travel since 2013, building the largest long-distance bus network in Europe, Türkiye, and North America – and also operating a growing network of long-distance trains in Germany. Through its booking platform and its expanding network of bus partners, the Company provides its customers with a comfortable and affordable collective mode of transportation for long-distance travel.



Customers influence our strategy and business model in several ways:

- › Safety represents a pillar in Flix strategy. We are committed to enhancing safety as a cornerstone of our service offerings, aspiring to be recognized globally as the safest travel provider. We adhere to strict safety protocols to ensure crews are well-prepared for emergencies, promoting a safe environment for all.
- › Preserving the privacy and security of personal data, as well as other information-related risks, is of paramount importance to Flix and requires robust cybersecurity measures and strict compliance with data protection legislation. Given the high volumes of personal data from customers, employees and partners being processed and managed by Flix, effective technological and organizational safeguards are imperative.
- › Flix can play a role in social inclusion of its customers by connecting outermost destinations. We offer the right to travel to all people around the globe. Furthermore, aim to improve both the level of digital and physical accessibility to travel to minority groups.

Impact, risks and opportunities related to customers involve many stakeholders, both in terms of impact and financial materiality: employees and job applicants; workers in the value chain; Management; investors and financial institutions; business and strategic project partners.

The engagement channels for customers include Flix's Post-Ride Survey, and other customer perspective reports provided by the Brand team. Additionally, any concerns or violation of rights are addressed through the [SpeakOut@Flix](#) whistleblower platform which is open to employees, customers, and business partners. Other engagement channels are the ones applicable to local communities (refer to section 3.3 Affected Communities).

## 3.4.2 Material IROs and their interaction with strategy and business model

### S4 Material impact, risk or opportunity

#### S4.1: Information-related impacts for consumers and/or end-users

Negative impact	Violation of data protection rights and resulting privacy breaches (e.g., through cyberattacks or improper handling of customer data).
Positive impact	Increasing transparency and consumer trust through transparent, regular media reporting on the economic situation of the company.
Risk	Data breaches, inadequate audits, or unlawful processing of personal data—especially when violating principles such as minimization, purpose limitation, or data subject rights—may result in reputational damage, regulatory fines, and loss of customer trust.

#### S4.2: Personal safety of consumers and/or end-users

Negative impact	Potential health and safety risks to passengers during travel, including in rare cases, fatal incidents.
Positive impact	Providing safety measures in buses and trains (including adaptations for country-specific safety considerations).
Risk	Outbreak of infectious diseases or armed conflicts could impact customer demand and reduce revenues.

#### S4.3: Social inclusion of consumers and/or end-users

Positive impact	Flix enables affordable travel on a limited budget and connects remote or underserved destinations.
Positive impact	Improved accessibility of digital services and physical infrastructure for passengers with reduced mobility.

The material IROs identified are spread along Flix's entire value chain: our business partners are part of our upstream value chain, while our customers are in the downstream part. For this reason, any IROs related to topics like data privacy and protection, safety or have implications throughout the value chain and are directly linked to our business model – both through our operations and business relationships with our business partners. The time horizon of the impacts is assessed to be short, medium and long-term.

### 3.4.3 Data privacy and protection

#### POLICIES

Data protection is a key focus for Flix's risk management and compliance efforts as a tech-enabled company. Among the mechanisms in place to ensure data protection are the Flix Data Protection Management System (DMS), global policies, and implementation of international information security standards.

Flix closely monitors data protection KPIs, including training enrolment rates, data subject requests, and interactions with data protection authorities. *The Flix Global Privacy Policy* as well as the EU Privacy Policy regulate the processing of personal data of customers and employees in the course of daily work at Flix. The most senior level accountable for the implementation of the policy in 2024 is the CFO.

Its aim is to draw attention to the statutory rules on data protection and to provide the framework and requirements to be observed by all employees when processing personal data.

Furthermore, Flix has in place a *Global Data Breach Policy* which describes how to respond to and document a security incident involving personal data from a data protection perspective, including how to determine if an incident constitutes a personal data breach and if so, whether it requires notification to competent data protection authorities and to the data subjects.

Flix's *Global Privacy Policy* and *Global Data Breach Policy* are internal documents as they define the rules Flix employees need to follow in these matters. Flix has also *Privacy Policies* according to Art. 13 GDPR available on its websites (for EU: <https://global.flixbus.com/privacy-policy>) which informs data subjects visiting the respective website about how their data is processed. Flix shares the email address of the data protection officer who is available for data protection related questions coming from affected data subjects (e.g. customers).

#### ACTIONS AND RESOURCES

During 2024, *Flix Global Privacy Policy* and *Global Data Breach Policy* were updated, while a new *Flix Global AI Policy* has been issued.

### 3.4.4 Customer safety

Flix's Safety Management System (SMS) extends to the inclusion of customer safety and security as well, recognizing that the safety of passengers is integral to operational excellence. Flix cares about the safety of our passengers with the belief that personal space must be respected at all times. We maintain a zero-tolerance policy toward misconduct, discrimination, or violence. Flix is actively implementing measures to enhance passenger security, aiming to ensure both physical safety and a sense of well-being throughout the journey. Drivers, station personnel, customer service and traffic control staff are trained on the topic of misconduct and equipped to recognize various forms of misconduct, respond appropriately when they witness, experience, or receive a report of it—whether involving a customer, a bus driver, or another staff member. Flix passengers have the ability to contact us directly on-site through via drivers or station personnel, or remotely through various customer service channels. For detailed information on the SMS guidelines, actions and targets, please refer to the 3.1.8 Health & Safety sub-section within the Own Workforce section.

## METRICS

In 2024, Flix reported 0.03 fatalities per million driven km. Furthermore, Flix classifies all collisions in accordance with the official definition of the United States Department of Transportation (DOT). The recorded collision rate was 0.13 per million driven km in 2024.

### 3.4.5 Consumers Digital Accessibility

We are making efforts to ensure that Flix's digital properties are accessible to all individuals, regardless of ability. Our goal is to comply with applicable accessibility standards included in the W3C's WCAG 2.2 guidelines<sup>28</sup>. We are working to ensure our websites and online services are accessible for all and are committed to following the W3C Web Content Accessibility Guidelines and other applicable web accessibility laws. To support this goal, we have partnered with Level Access, whose platform and 25 years of expertise help us achieve and maintain accessibility compliance. Their digital accessibility platform is used to evaluate our digital properties in accordance with best practices and is supported by a diverse team of accessibility professionals, including users with disabilities. Through this partnership, Flix is further developing its digital accessibility program and capabilities to ensure that design, development, and testing of our websites and services meet accessibility standards.

## ACTIONS AND RESOURCES

An internal assessment was also implemented this year to identify action items for improving the accessibility of the Help section of our website. Furthermore, we updated our Digital Accessibility Statement to comply with applicable accessibility standards included in the W3C's WCAG 2.1 guidelines. Dedicated training programs and knowledge were provided to support Flix's growth, with a focus on new markets and products launched in 2024.

Customer service launched a pilot of our first AI-Powered chatbot assistant, with plans to scale across multiple markets in 2025, allowing us to efficiently serve customers around the clock. Integration of advanced workforce management technology has enabled consistent improvements to our customer service performance.

Our efforts for ensuring an inclusive travel experience via our website accessibility were awarded with Flix being ranked as top two in Germany for web accessibility by a 2025 [study](#)<sup>29</sup> published by the software company Eye-Able. The study assessed 60 highly visited sites, which achieved just 46 out of 100 possible points, with Flix scoring 69 points. These results reflect that our accessibility initiatives, such as improving color contrast, providing targeted training, and implementing accessibility checks early in the development process, are delivering measurable results.

We are aware that there is still room for improvement. We are preparing to roll out an advanced agent tooling system specifically aimed at supporting agent workflows, with expected improvements in overall service efficiency.

Customer service will continue efforts to improve customers' experience. In particular, AI-powered digital assistants will expand into the voice channel in addition to text-based services. New solutions will be introduced to streamline and automate customer service processes, and the toolkit available to customer service agents will be further upgraded.

### 3.4.6 Consumers Physical Accessibility

While a general policy is not in place, Flix dynamically adapts to the different regulations from country to country across countries. For example, Germany requires at least two wheelchair spaces per coach. We ask our bus partners to confirm compliance with national regulations during the bus approval process. A detailed seat-booking procedure for customers using wheelchairs is available. All the details for requesting assistance for passengers with disabilities are described on the website<sup>30</sup>. In countries where specific accessibility regulations are not yet established (e.g., India or parts of Eastern Europe), proactive measures are currently limited, but this remains an area for future development.

28 More information available here: <https://www.w3.org/TR/WCAG22/>.

29 More information available here: [Barrierefreiheit: Diese Websites schließen Nutzer mit Behinderung aus.](#)

30 [https://help.flixbus.com/s/topic/0TO3X000000V0q8WAG/passengers-with-disabilities?language=en\\_GB](https://help.flixbus.com/s/topic/0TO3X000000V0q8WAG/passengers-with-disabilities?language=en_GB)

## 4. Governance Information

### 4.1 Business Conduct

Business ethics and compliance are integral to Flix's operations. Anchored by a robust Compliance Management System (CMS), the Company prioritizes ethical conduct, enforces stringent policies, and cultivates a culture that values adherence to laws and ethical standards across its global operations. As a global corporation, Flix is subject to various laws and regulations, and adheres to strict corporate ethical standards and internal policies. All Flix subsidiaries, employees, and partners are expected to comply with applicable laws and uphold high standards of ethical conduct to drive sustainable, long-term value. Compliance with legal requirements not only prevents Flix from incurring financial penalties but also significantly reduces the risk of damage to the Company's reputation.

#### 4.1.1 Identification and assessment of Material IROs

##### G1 Material impact, risk or opportunities

G1.1: Corporate culture	
Positive impact	Improved employee well-being, stronger engagement, and alignment with company values through a supportive work environment, inclusive culture, and clear strategic direction.
Opportunity	Better performance, employee retention, and increased revenue driven by motivation to work for a trusted organization.
Positive impact	Protection of rights and freedoms of customers, employees, and partners through adherence to relevant laws, internal policies, and regular compliance training.
Risk	Reduced performance and revenue due to a problematic or toxic corporate culture.
Opportunity	Compliance with all laws and good business ethics is essential for sustainable value creation.
Positive impact	Through Flix's <i>Acquisition Due Diligence Guideline</i> (business partner questionnaire, safety check file, financial check file, partly also environmental criteria), Flix makes sure to cooperate with business partners who meet certain safety measures as well as environmental criteria, which in turn positively impacts passengers and nature.
Negative impact	Negative effects on the economic stability of business partners and their employees due to late payment of business partner invoices.
Risk	Bus or train partner failing to deliver agreed service (e.g. number of qualified train staff), leading to customer dissatisfaction and therefore, loss of reputation and earnings.
Risk	Reputational damage from late payments of invoices leading to fewer business partners wanting to cooperate with Flix, resulting in fewer business opportunities and earnings for Flix.
Opportunity	Reputation enhancement (and the ability to work with other business partners) through on-time payment of invoices – and by ensuring the <i>Acquisition Due Diligence Guideline</i> (business partner questionnaire, safety check file, financial check file, partly also environmental criteria) is in place. By actively working with business partners to ensure implementation of safety measures as well as ethical and legal standards, Flix can ensure the resilience and safety of its transportation service – in turn enhancing the company's reputation and earnings.
G1.2: Protection of whistleblowers	

Positive impact	A functioning whistleblower system with adequate protections promotes psychological safety, increases trust, and strengthens alignment with corporate values.
Negative impact	A lack of whistleblower protection can lead to psychological stress, reduced employee engagement, and increased risk of rights violations.
Opportunity	Whistleblowing systems enable early detection of misconduct or risk, helping Flix avoid reputational and financial harm.
G1.3: Political engagement	
Positive impact	Policy engagement supports cross-border connectivity, collective mobility, and a shift toward alternative fuels, improving quality of life and sustainability in the communities where Flix operates.
Opportunity	Collaboration with local and national governments fosters favourable regulation and market conditions for collective transport.
Risk	Policy inaction or unfavourable regulation could restrict operations, limit sustainable growth, or slow the transition to low-carbon transport.
G1.4: Management of relationships with suppliers	
Negative impact	Late payments to business partners may affect their financial stability and that of their employees.
Risk	Failure by a partner to meet service obligations (e.g., lack of qualified staff) can damage Flix's reputation and reduce customer satisfaction.
Risk	Chronic late payments can deter future partners, reduce collaboration opportunities, and impact earnings.
Opportunity	Reputation enhancement (and the ability to work with other business partners) through on-time payment of invoices – and by ensuring the <i>Acquisition Due Diligence Guideline</i> (business partner questionnaire, safety check file, financial check file, partly also environmental criteria) is in place. By actively working with business partners to ensure implementation of safety measures as well as ethical and legal standards, Flix can ensure the resilience and safety of its transportation service – in turn enhancing the company's reputation and earnings.
G1.5: Corruption and bribery	
Positive impact	Effective anti-corruption measures – such as ethical culture, compliance programs, due diligence, transparency, and whistleblower protection – help prevent misconduct.
Negative impact	Corruption tolerance can lead to economic and social harm, inequality, diminished public trust, and instability.

## 4.1.2 Role of administrative bodies

In terms of Management Board & Supervisory Board, business conduct-related topics are regularly addressed by the Compliance team.

## 4.1.3 Corporate culture

Flix's Compliance Management System (CMS) encompasses the *People Code of Conduct*, the *Business Partner Code of Conduct*, and several policies addressing key compliance risks such as Corruption and Data Protection. It also includes corporate policies regarding a Whistleblowing program, internal investigation procedures, and mandatory compliance

training for all employees. The CMS ensures employees are informed about legal obligations and ethical standards through training and policy dissemination. Flix' compliance network is established globally, with local Compliance Officers and Compliance Coordinators offering support.

## POLICIES

To uphold ethical and legally compliant business practices, Flix relies on the *People Code of Conduct* and *Business Partner Code of Conduct* as foundational frameworks for managing relationships with employees and business partners.

### 4.1.4 Protection of whistleblowers

Flix's own workforce, workers in the value chain, suppliers and other external parties are encouraged to report concerns through or dedicated whistleblowing portal. All concerns undergo investigation leading to sanctions for any violations that are identified. The *Code of Conduct for Business Partners* reflects Flix's commitment to high ethical standards for all partners.

## POLICIES

Flix has an established *Global Whistleblowing Policy*, which provides a framework for employees and third parties to report concerns about illegal, unethical, or improper conduct through confidential channels, including an anonymous help-line and web portal. The policy includes a strict anti-retaliation clause, ensuring that no employee who raises concerns in good faith will face dismissal, demotion, harassment, or any unfair treatment, even if the reported issue is ultimately unsubstantiated. All whistleblowing reports are handled exclusively by trained legal professionals (qualified German lawyers). Employees receive regular training and awareness sessions on the whistleblowing process.

## REMEDIATING NEGATIVE IMPACTS

Flix has developed an incident management procedure to give employees to ensure they understand how they can report suspected breaches of Code of Conduct and/or other policies, and what they can expect after doing so. Information on the mechanisms for seeking advice and raising concerns are included in the *People Code of Conduct*. External parties can submit complaints to [fairbusiness@flixbus.com](mailto:fairbusiness@flixbus.com).

### 4.1.5 Political engagement

Flix uniquely combines technology with traditional transport operations. Both FlixBus and FlixTrain services thrive due to strong demand for collective passenger transport in many countries, despite varied regulatory frameworks. These services meet the need for accessible, climate-conscious mobility. The transport sector is highly regulated, with rules differing significantly across markets. The dominance of state-owned companies and high regulation levels, especially in rail transport, significantly influence decisions made by parliaments and governments.

Young and innovative companies must invest considerable efforts to achieve fair operating conditions for long-distance bus and rail transportation. There is a significant need for education and advocacy in the political arena, as collective passenger transport has traditionally been seen as an essential state responsibility, especially across Europe. However, as proven across the globe, private operators, when permitted to enter the market, are responsible players who provide affordable, safe and efficient long-distance transportation, with significantly lower CO<sub>2</sub> emissions per passenger kilometre compared to cars or planes.

Flix's main lobbying activities aim to create a fair framework for private companies to offer commercial services. This includes advocating for the harmonization of rules across countries and simplifying the authorization procedures for operators. Here are some examples:

- **FlixTrain:** Currently only operating in Germany, FlixTrain advocates for reforming the track access charges system, which acts as a significant market barrier for new entrants. Germany currently has the highest track access charges in Europe, which limits service expansion and results in fewer options and higher ticket prices for passengers.

Achieving fair competition between operators in transport benefits passengers through better connectivity, improved service quality, and lower fares.

- **FlixBus:** Advocates for equitable and non-discriminatory access to bus stop infrastructure, a universally pertinent issue across European markets, India, and the Americas. Even in cases of well-developed bus infrastructure, new entrants and private companies often face access restrictions. FlixBus contends that integrating our services into existing infrastructure would enhance passenger convenience by enabling better intermodal transfers at key hubs. Additionally, city governments could benefit from enhanced public transport offerings and more efficient use of station capacity.

Flix also aims to accelerate its transition to sustainable fuels and, eventually, to battery- or fuel cell-electric vehicles. To support this transition, Flix engages with members of parliaments and governments – as well as other relevant stakeholders – to advocate for vehicle purchase incentives and funding for the rollout of charging and refuelling infrastructure at long-distance coach hubs. In a world that is aspiring closer to a low or zero carbon mobility, both passengers and city inhabitants with access to coach networks will benefit from cleaner air, quieter cities, and reduced congestion.

Overall, the aim of Flix's interest representation is to communicate its practical business experience as an innovative global travel tech company and to achieve improvements in the framework and competitive conditions in the European and global transport industry.

During FY 2024, Flix did not make any financial or in-kind contributions to any political parties or beneficiaries.

#### 4.1.6 Management of relationships with suppliers

Prior to signing a contract with a new bus partner, the bus partner must be reviewed as per our Acquisition Due Diligence guidelines. This due diligence process inquires into the prospective bus partner's compliance measures, safety measures and financial stability. All relevant documentation related to these checks must be submitted by the bus partners for Flix approval.

##### POLICIES

Flix's relationship with suppliers across the value chain is primarily managed by the Business Code of Conduct, which covers key considerations related to environmental protections, anti-money laundering, workers' rights, anti-discrimination and anti-harassments, etc.

##### REMEDIATING NEGATIVE IMPACTS

In case of serious or repeated violations of the *Business Partner Code of Conduct*, Flix is entitled to terminate existing suppliers.

#### 4.1.7 Corruption and bribery

Flix prevents corruption and bribery by enforcing strict Anti-Fraud, Anti-Bribery, and Anti-Corruption policies, which prohibit improper payments, kickbacks, and conflicts of interest, while mandating compliance training and due diligence for employees and third parties.

##### POLICIES

Flix's *Global Anti-Fraud, Anti-Bribery, and Anti-Corruption Policy* outlines the company's commitment to integrity, honesty, and transparency in business dealings, strictly prohibiting fraud, bribery, and corruption. It details expectations for employee conduct; guidelines on gifts, hospitality, and business relationships; and compliance with international anti-corruption laws, enforcement measures, and reporting mechanisms for violations.

All policies are published on Flix' intranet. Regular communication through various channels like email, internal social sites and intranet includes reference to these respective policies to create awareness and encourage engagement.

## REMEDIATING NEGATIVE IMPACTS

Flix detects potential misconduct primarily through its [SpeakOut@Flix](#) whistleblowing platform, which offers confidential and anonymous reporting channels, alongside regular audits and compliance monitoring. All allegations are investigated internally, with outcomes ranging from disciplinary actions to escalation under international anti-corruption frameworks. Strict anti-retaliation protections ensure that whistleblowers are safeguarded against any adverse consequences.

## METRICS

To prevent corruption and bribery, Flix has implemented dedicated mandatory compliance training on the on the topics Code of Conduct and Anti-Corruption. All new employees must complete the required courses as part of their onboarding, and they are automatically enrolled in a refresher course every two years. Employees within functions identified as 'at-risk' are required to take the training annually.

At-risk functions covered by Anti-Corruption & Anti-Bribery Training	2024
Training coverage of employees within at-risk functions (in headcount)	1,649
Actual participation of employees within at-risk functions (in headcount)	1,438
Training coverage rate of employees within at-risk functions	87.2%

### Methodology

*The above KPI has been calculated based on the enrolment and completion data coming from our internal learning management system. The risk profile is primarily assigned by the Compliance team and is later integrated into the learning management system. The KPI also covers Supervisory and Management Board members as part of the training coverage.*

Corruption and bribery incidents	2024
Number of convictions for violations of anti-corruption and anti-bribery laws	0
Amount in fines for violations of anti-corruption and anti-bribery laws (in euros)	0

### Methodology

*There are no confirmed incidents, convictions or fine issued by court of law related to violations of anti-corruption and anti-bribery laws during the financial year.*

## 4.1.8 Payment Practices

Flix operates with different payment terms across its subsidiaries, tailored to specific needs and agreements. However, in general, Flix follows a payment structure of 15 days for mobility service costs, 30 days for infrastructure and other service costs, and immediate payment for general and administrative expenses. This approach ensures consistency and efficiency across the organization, while also maintaining flexibility for individual subsidiaries to manage their local requirements.



## METRICS

Payment Practices	Flix	Kâmil Koç	Greyhound
Average no. of days it takes to pay an invoice	12	13	15
Number of legal proceedings outstanding for late payments	0	0	0

### Methodology

*Flix Group does not have a centralized policy for payment practices, as payment terms are outlined in supplier contracts. Standard payment terms for suppliers generally range from 30 to 60 days and are negotiated individually. The most common payment term 30 days for bus partners & bus cost suppliers, with exceptions for expenses such as rent, salaries, and general & administrative fees, which typically have immediate payment terms.*

*The average number of days for invoice settlement is determined by calculating the difference between the payment date and the invoice creation date, then dividing it by the number of fully paid invoices. Only accounted invoices are considered in the calculation, while cancelled, incomplete, or voided payments are excluded. If an invoice is paid through multiple settlements or instalments, the latest payment date or instalment due date is used to ensure accuracy. This method provides a clear view of invoice settlement efficiency across the organization.*

# 5. Annexures

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### List of ESRS Disclosure Requirements

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ESRS 2-GOV-3	Integration of sustainability-related performance in incentive schemes	1.3 Governance	11
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## > 5.2 Glossary

B2C	Business to Customer
BioLNG	Bio-Liquefied Natural Gas
CapEx	Capital Expenditure
CCO	Chief Commercial Officer
CEO	Chief Executive Officer
CFO	Chief Financial Officer
CIO	Chief Information Officer
COO	Chief Operating Officer
CSR	Corporate Social Responsibility
CSRD	Corporate Sustainability Reporting Directive
DACH	Germany (D), Austria (A), Switzerland (CH)
DEI	Diversity, Equity & Inclusion
DMA	Double Materiality Assessment
EEA	European Economic Area
EFRAG	European Financial Reporting Advisory Group
ERG	Employee Resource Groups
ERM	Enterprise Risk Management
ESG	Environmental, Social & Governance
ESRS	European Sustainability Reporting Standards
EU	European Union
EV	Electric Vehicle
FMX	Flix Mobility Experience GmbH
FTE	Full-Time Equivalent
GHG	Greenhouse Gas
GWP	Global Warming Potential
HFC	Hydrofluorocarbons
ICS	Internal Control System
IPCC	Intergovernmental Panel on Climate Change
IRO	Impacts, Risks and Opportunities

KPI	Key Performance Indicators
LED	Light-Emitting-Diode
LEED	Leadership in Energy and Environmental Design
LGBTQ+	Lesbian, Gay, Bisexual, Transgender and Queer or questioning
LkSG	Lieferkettensorgfaltspflichtengesetz
NGOs	Non-Governmental Organizations
NPS	Net Promoter Score
OEM	Original Equipment Manufacturers
OpEx	Operational Expenditure
PFC	Per- and polyfluoroalkyl
RoW	Rest of the World
SBTi	Science Based Target Initiative
SMS	Safety Management System
STI	Short-Term Incentives
TCFD	Task Force on Climate-Related Financial Disclosures
W3C	World Wide Web Consortium
WBCSD	World Business Council for Sustainable Development