

Implementation Plan for Climate Target 2030

Scope 3, Category 11 – Use phase of passenger cars and light commercial vehicles

Volkswagen AG

Presentation of the targets, target pathway, measures, resources, risks and progress monitoring, taking into account the EmpCo requirements.

The implementation plan is subject to ongoing monitoring. In the event of material changes to the underlying assumptions, framework conditions or findings, the implementation plan may be adjusted.

This English version is a translation provided for information purposes only. The German version is the original version of the Implementation Plan. In the event of discrepancies resulting from translation, the German version shall prevail.

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Implementation Plan for Climate Target 2030

Scope 3, Category 11 – Use phase of passenger cars and light commercial vehicles

Target: The Volkswagen Group pursues a target validated by the Science Based Targets initiative (SBTi): by 2030, we aim to reduce the average CO₂e emissions from the use phase of covered passenger cars and light commercial vehicles (Scope 3, Category 11) per kilometre driven by 30% compared with the 2018 base year.

Key data point	Definition
Base year	2018
Target year	2030
Target level	–30% compared with 2018, per kilometre driven
Covered emissions scope	Scope 3, Category 11 under the GHG Protocol (Greenhouse Gas Protocol) for sold passenger cars and light commercial vehicles (Light Duty Vehicles) of the Group
Covered brands	Volkswagen Passenger Cars, Škoda, SEAT/CUPRA, Volkswagen Commercial Vehicles, Audi, Bentley, Lamborghini, Porsche and Jetta
Status achieved in 2025	Approx. –17% ¹⁾
Remaining gap	Approx. 13 percentage points
Target validation	Climate target validated by the Science Based Targets initiative (SBTi) (2022)

1) The data basis for calculating the approx. 17% reduction consists of the Scope 3 emissions for the use phase for 2018 and 2025, which were validated prior to publication in the 2025 Annual Report for the purpose of that publication. However, the conversion of these values into the reduction percentage of approx. 17% was not separately validated and is subject to possible future recalculations in accordance with the defined methodology.

1 Objective and scope

1.1 Environmental objective

The Volkswagen Group pursues the objective of reducing the average CO₂e emissions from the use phase of covered passenger cars and light commercial vehicles by 30% per kilometre driven by 2030 compared with the 2018 base year. The target is intensity-based, relates to Scope 3, Category 11 under the Greenhouse Gas Protocol (GHG Protocol), and was validated by the SBTi (Science Based Targets initiative). The SBTi is a private initiative that reviews corporate climate targets against its criteria applicable at the time of validation. The target is a voluntary corporate objective; it is not based on, and does not create, a legal obligation. The legal requirements for vehicle CO₂ emissions arise independently from the respectively applicable vehicle and fleet regulation. This implementation plan sets out the target pathway, measures, resources, risks, monitoring and external validation.

1.2 Scope and accounting logic

- Covered vehicle groups: passenger cars and light commercial vehicles of the Volkswagen Group. The following brands are currently included in the Group: Volkswagen Passenger Cars, Škoda, SEAT/CUPRA, Volkswagen Commercial Vehicles, Audi, Bentley, Lamborghini, Porsche and Jetta.
- Metric: average Scope 3 use-phase emissions (Category 11) per kilometre and vehicle; 2018 index = 100.
- Methodology, data sources, assumptions on lifetime mileage, energy consumption, fuel and electricity emission factors, and methodological changes are reviewed annually for up-to-dateness and documented in internal decision documents.
- Recalculations of the base year or progress values are performed in accordance with a predefined recalculation policy and explained, including their effect.
- Material exclusions, changes in the consolidation scope, and relevant acquisitions or divestments are to be documented in internal decision documents and assessed with regard to their impact on the target pathway and comparability.

1.3 CO₂e calculation method

The CO₂e emissions include the well-to-wheel emissions of all passenger cars and light commercial vehicles produced in the respective year (including contract manufacturing since 2025), based on a standard assumed lifetime mileage of 200,000 km. Since 2025, the calculation has been based on average powertrain-specific fleet emissions (g CO₂/km) and average electric energy consumption in the main markets Europe (EU27, United Kingdom, Norway and Iceland), China and the USA according to the currently legally applicable driving cycles, replacing weighted average fleet emissions. To calculate the corresponding well-to-tank emissions, region-specific emission factors for fuel and electricity supply chains from a representative generic database are used (since 2025 according to IPCC AR6). The DKl⁽²⁾ calculation and selected underlying methodology and data components are reviewed as part of the annual report audit by Ernst & Young and TÜV NORD CERT GmbH.

The GHG Protocol provides for the recalculation of emissions where material new findings or changes have occurred. There may be different reasons to reassess emissions from previous years in order to enable a fair comparison with current emissions: structural changes in the company, changes in the calculation method, improved accuracy of emission factors or activity data, or

findings regarding significant errors. Within the Volkswagen Group, calculation changes are decided once a year in a defined process.

Changed calculation assumptions are generally taken into account for recalculation if the expected total effect on the DKI²⁾ exceeds 0.1 t CO₂e per vehicle or exceeds 1 million t CO₂e for a Scope 3 GHG emissions category in the base year of the current climate targets (2018). Based on the approved changes in assumptions, the DKI²⁾ values for the years between 2018 and the most recent reporting year are recalculated.

2) DKI (Decarbonization Index): greenhouse gas emissions along the value chain of a vehicle.

1.4 Nature of the document

This implementation plan informs consumers about a voluntary corporate objective and the measures planned to achieve it. It is not the transition plan under the sustainability reporting provisions (Articles 19a and 29a of Directive 2013/34/EU, ESRS E1-1) and does not replace it. It does not create any third-party rights or obligations of conduct beyond statutory requirements; the statutory requirements for vehicles remain unaffected. Statements regarding future developments are based on assumptions and plans that may change.

2 Baseline and target pathway

By the end of 2025, a reduction of approx. 17%³⁾ had already been achieved. The externally communicated target remains a reduction of 30% by 2030 compared with the 2018 base year. The further target pathway through to 2030 will be reviewed as part of the annual planning, monitoring and steering processes. A mid-term review is scheduled for 2028 to assess current progress, the effectiveness of measures and any potential need for adjustments with regard to achieving the 2030 target. A separate numerical interim value for 2028 is not disclosed as an external target commitment. The base year, actual values, data sources used, emission factors, assumptions and possible data uncertainties are documented in an auditable manner.

Year	Target level vs. 2018	Status / function
2018	0 %	Base year
2025	Approx. -17% ³⁾	Actual value
2028	No separate numerical interim value	Mid-term review of the target pathway; review of progress, effectiveness of measures, scenarios, resource requirements and any potential need for adjustments with regard to achieving the 2030 target
2030	-30 %	Final target

3) The data basis for calculating the approx. 17% reduction consists of the Scope 3 emissions for the use phase for 2018 and 2025, which were validated prior to publication in the 2025 Annual Report for the purpose of that publication. However, the conversion of these values into the reduction percentage of approx. 17% was not separately validated and is subject to possible future recalculations in accordance with the defined methodology.

3 Quantified impact logic of measures

According to the current planning logic, the remaining reduction of approx. 13 percentage points between 2025 and 2030 is intended to be addressed through a package of measures. The central company-internal lever is the transformation of the portfolio towards electric mobility. This includes the ramp-up of fully electric vehicles as well as partially electrified powertrains such as PHEV⁴⁾, together with supplementary efficiency measures. External prerequisites, in particular market acceptance of electrified vehicles, regional demand, regulatory framework conditions, and developments in the energy and electricity mix, are to be reviewed as risk and sensitivity assumptions as part of the annual planning process.

The impact logic distinguishes between measures that can be managed internally by the company and external prerequisites: Volkswagen plans to support achievement of the target through portfolio decisions, electrified model offerings and efficiency improvements. At the same time, volume assumptions driven by market and framework conditions are treated as sensitivities. In the event of deviations from the planned ramp-up, causes are to be analysed, countermeasures assessed, and decisions prepared within the relevant strategy, product, sales and budget processes.

4) PHEV: Plug-in Hybrid Electric Vehicle

Lever	Share of remaining gap	Contribution (rounded)	Evidence
Transformation of the portfolio towards electric mobility	Material contribution to closing the remaining gap; quantitative impact according to internal bridge calculation, dependent on material market, regulatory and technology assumptions	approx. 13 percentage points	Internally approved product, sales and powertrain planning from the 2024 planning round, as well as internal bridge calculation of the quantitative impact on the target pathway. These documents contain trade secrets and are not published; they are documented internally in an auditable manner and submitted within permissible audit and approval processes. A more detailed description of the planning process is included in the Volkswagen Annual Report.
Efficiency optimisation for ICE ⁵⁾ and BEV ⁶⁾	Supportive	No separate quantitative contribution disclosed; potential efficiency effects are considered as part of the overall assessment of the portfolio transformation.	Type-approval and real-consumption-related efficiency indicators
Expansion of renewable energy in the electricity grid	Supportive	External additional contribution	Regionally weighted emission factors

5) ICE: Internal Combustion Engine

6) BEV: Battery Electric Vehicle

4 Programme of Measures

4.1 Transformation of the portfolio towards electric mobility

- Transformation of the product portfolio towards electric mobility in the relevant segments and markets in accordance with approved product, sales and powertrain planning; includes BEV and partially electrified vehicles such as PHEV.
- Intended introduction of additional volume-relevant electrified models and further development of electric platforms in order to achieve the planned powertrain mix by 2030.
- Management of the powertrain mix through market- and brand-specific roadmaps; regular comparison of planned and actual shares for BEV and PHEV.

4.2 Vehicle and powertrain efficiency

- Reduction of energy consumption intended through efficiency optimisations in powertrain, battery, aerodynamics, weight and software.

5 Milestones and deliverables

Timing	Milestone	Evidence / deliverable
2022	Validation of the 2030 target by SBTi (Science Based Targets initiative)	PDF documents from SBTi
annually	Annual KPI closing, update of the bridge calculation and comparison with the target pathway	Audit-ready documented progress report comparing actual value and target pathway, including material assumptions, data/methodology changes and assessment of any deviations
2028	Mid-term review of the target pathway, including scenario, resource and measures assessment	Assessment of progress, effectiveness of measures, material market and regulatory assumptions, resource requirements and any potential need for adjustments with regard to achieving the 2030 target; documentation of results for internal steering
2030	Review of target achievement: -30% compared with 2018	External review of target achievement and documented final assessment, including scope of review, cut-off date, data basis and any limitations

Note: The 2028 mid-term review serves as an internal review of the target pathway and the relevant market, regulatory, scenario and resource assumptions with regard to achieving the 2030 target. It does not constitute a separate external target commitment.

6 Resources and responsibilities

Function	Core responsibility
Group Sustainability	Target definition, monitoring, methodology, consolidation and public reporting on progress
Brands / Product Strategy	Portfolio, powertrain and model roadmaps; implementation of electrification
Technical Development	Calculation of the DKl; efficiency measures and technical evidence of impact
Sales / Markets	Market ramp-up, sales mix and customer-related support measures
Finance / Controlling	Linkage with planning and budget processes
External expert	Independent initial review and regular progress reviews; after final approval, results are to be made accessible together with the scope of review, date and any limitations.

6.1 Provision of resources

Implementation of the climate target is supported by financial, human, technological and organisational resources embedded in Group-wide strategy, product and budget processes. Since achievement of the 2030 climate target is expected to be materially supported by the ramp-up of electric mobility, reference is also made to the information provided by the Volkswagen Group in the 2025 Annual Report, in particular the Sustainability Report section on the EU Taxonomy and the chapters on climate change, transformation strategy and corporate steering. These disclosures include information on transformation-related investment and expenditure figures as well as supplementary information on organisational responsibilities and human resources that describe the company's transformation context. They are used as a documented resource basis for assessing the plausibility of this implementation plan. They do not constitute a separate or additional resource commitment beyond the approved Group-wide strategy, product and budget processes. The availability, prioritisation and continued suitability of the relevant resources are reviewed as part of the annual planning and monitoring processes and assessed with regard to their potential impact on the target pathway.

Material changes in resource availability or prioritisation are to be assessed as part of the annual planning update and disclosed with regard to their impact on the target pathway. Where required resources have not yet been finally approved, this is identified as a planning uncertainty and taken into account in the assessment of the target pathway.

7 KPI and monitoring system

KPI	Frequency	Steering purpose
DKI (Decarbonization Index) – greenhouse gas emissions along the value chain of a vehicle	Annually	Central steering KPI for the target pathway, progress and Board reporting, and part of management and Board remuneration. The DKI measures the development of greenhouse gas emissions along the value chain and reflects the decarbonization impact of the vehicle fleet.
BEV share of relevant deliveries	Quarterly	Central early indicator for the transformation of the portfolio towards electric mobility; monthly tracking of BEV sales ensures the data basis for monitoring.
PHEV share of relevant deliveries	Quarterly	Supplementary early indicator for partial electrification
Data and methodology changes	Annually	Transparency and comparability
Forecast for achieving the 2030 target from the annual planning round	Annually	Simulation of the DKI value for 2030 based on internal volume and powertrain mix planning from the annual planning round; data from external databases are used for factors that cannot be managed internally, in particular emissions from the electricity mix. Results serve as the basis for Board reporting, deviation analysis and decisions on measures, where required.

The DKI forecast for achieving the 2030 target is determined annually on the basis of current planning data and reported to the Group Board of Management. The target achievement assessment is based on a simulation of the DKI value for 2030 using internal volume and powertrain mix planning from the planning round. For factors that cannot be managed internally, in particular emissions from the electricity mix, data from external databases are used. In addition, regular tracking of BEV sales provides a material data basis for intra-year monitoring. Early indicators for planning deviations include, in particular, BEV sales and BEV share, PHEV shares, and changes in subsidies and regulation.

Where risks to target achievement are identified, causes are to be analysed and general market and sales instruments for countermeasures are to be assessed. These are to include, in particular, leasing and financing offers, regional sales steering and sales focus areas. The measure options are to be assessed, including estimates of costs and impact, and submitted for decision.

In addition, the DKI (Decarbonization Index) is embedded in the remuneration systems for the Board of Management and management, thereby supporting the alignment of corporate steering with the climate target. Fulfilment of the annual DKI targets is also tracked during the year in order to identify deviations at an early stage and initiate necessary measures.

8 Risks and scenarios

Risks that may adversely affect the planned ramp-up of electrified vehicles as a result of weaker market demand, changes in subsidy frameworks, regulatory adjustments or macroeconomic effects are to be assessed as part of the annual planning processes. The underlying volume assumptions are therefore treated as sensitivities and regularly compared with actual data.

Potential risk	Early indicator	Potential countermeasure
Volume ramp-up below plan / BEV demand below plan	BEV sales tracking, BEV share	Market and sales instruments for counter-steering, in particular leasing and financing offers, regional sales steering and sales focus areas
Electricity mix decarbonises more slowly	Regional emission factor	Conservative scenario; additional operational levers
Changes in regulatory framework conditions, e.g. fleet regulation	Legislative procedures, political decisions, regulatory consultations	Review of measures planning; assessment of impacts on powertrain mix and sales planning; derivation of portfolio, market and efficiency measures; the 2030 target level remains unaffected.
Methodology / data changes	Recalculation trigger	Transparent recalculation and external review

For material risks, scenarios and sensitivities are documented. The plan distinguishes between measures that can be managed internally by the company and external prerequisites, in particular market acceptance, regulatory framework conditions, developments in the energy and electricity mix, and relevant supply chain influences. In the event of material deviations, the target pathway is to be reviewed, the implementation plan updated and, after final approval, the result of the external review made accessible together with the scope of review, date and any limitations.

Target achievement is partly based on assumptions regarding external developments, in particular market acceptance of electrified vehicles, regulatory framework conditions and decarbonization of the electricity system. These assumptions and their impact on target achievement are to be reviewed annually.

9 External validation

The implementation plan for the forward-looking statement on the 2030 climate target was validated in September 2026 by the independent external expert TÜV NORD CERT GmbH in accordance with the TN-CC 020 review standard. The validation focused in particular on the traceability, documentation and verifiability of the underlying assumptions, targets and measures, as well as the resource, financing and monitoring processes at the time of the review.

Based on the review performed, no indications were identified that the forward-looking environmental claim at the time of the review was not based on traceable, documented and verifiable foundations or contradicted the applied review criteria.

The validation was performed on the basis of the information available at the time of the review and as part of a sample-based review procedure with a limited level of assurance. It does not constitute confirmation or a guarantee of future target achievement. Responsibility for implementing the implementation plan and for achieving the climate target remains with Volkswagen AG.

The calculation of the Scope 3 inventory and selected underlying methodology and data components are reviewed as part of the annual report audit by Ernst & Young and TÜV NORD CERT GmbH.