

Statement

Transparency

This Statement is an externally disclosed version of Polestar's internal Transparency Directive. It reproduces the Directive while excluding internal instructions and operational details intended for employees.

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Polestar’s Transparency Directive

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Global
(Polestar Automotive Holding UK PLC and all subsidiaries)

Owner
Sustainability Team

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1 Introduction and purpose

This Statement details how Polestar implements its Sustainability Policy as it relates to Transparency, more specifically the topics of supply chain transparency, traceability, consumer transparency and communication. Transparency is a strategic enabler of Polestar's sustainability agenda and a core governance mechanism that supports:

- Trust with customers, investors, regulators, and partners.
- Compliance with rapidly evolving global regulations.
- Better decision-making grounded in verified data.
- Stronger risk identification and mitigation across the entire value chain.

2 Commitments and expectations

Polestar's commitment is to be a trailblazer for transparency in the automotive industry. We aim to be the world's most transparent car company, with the objective that all claims we do regarding sustainability are accurate, verifiable and transparently communicated.

Within the scope of this Statement, transparency requires that:

- Information on materials, sourcing, and traceability is transparent, accurate, and verifiable, supported by different levels of traceability assurance.
- Disclosures are presented in a clear and understandable manner, enabling customers and other stakeholders to access and interpret the information without unnecessary technical barriers.
- Any limitations, uncertainties, assumptions, or data gaps are explicitly disclosed, ensuring that reported information provides a fair and honest representation rather than a selective account.

3 Our approach to Due Diligence

Polestar drives transparency through a process of due diligence to embed responsible business conduct on transparency and to identify, assess, prevent, mitigate, and remediate risks relating to transparency across the value chain.

3.1 Embedding responsible business conduct on transparency

We make transparency a part of decisions throughout our business, embedding it into the governance and management system of our company through:

- the Sustainability Policy, which acknowledges the importance of transparency and traceability in supply chains.
- assigning ownership, monitoring and coordination of the Transparency and traceability actions to Global Function Sustainability.
- ensuring that organisational roles, resources and budgets are in place at relevant

Global Functions to implement our strategic transparency initiatives.

- the Code of Conduct for Business Partners and Procurement Policy, which require our Business Partners to identify and manage sustainability risks in their own operations and supply chains, continuously map their supply chains using a risk-based approach, and support Polestar's efforts to achieve transparency and traceability of risk materials by maintaining and providing relevant supply chain and due diligence information upon request.
- supporting all coworkers at Polestar to grow in their profession within transparency and traceability through providing training and education as well as guidance and tools.

Governance is performed by Global Function Sustainability and reviewed by the Executive Committee and Board of Directors.

3.2 Identifying and assessing transparency-related risks

3.2.1 Risk raw material assessment

Polestar shall conduct and review a risk raw material assessment annually, and defines a critical material for the electric vehicle industry where significant ESG risks, including human rights issues, environmental impacts, and governance weaknesses, may be present. Polestar evaluates each material against 24 criteria covering:

- **Human rights and social risks:** Child labour, forced labour, Indigenous rights, and community conflict.
- **Governance risks:** Corruption, illicit financial flows, and weak tax compliance.
- **Environmental risks:** Deforestation, biodiversity loss, pollution, and radioactive tailings.
- **Supply chain risks:** Resource depletion, price volatility, and recyclability challenges.

Transparency for identified risk raw materials is essential to support responsible sourcing, risk management, and effective due diligence throughout the supply chain.

3.2.2 Risk area list

In addition to identifying risk raw materials, Polestar maintains a Risk Area List covering geographic regions and areas where sourcing may involve elevated and non-mitigable ESG risks. These include locations with severe human rights concerns, such as regions inhabited by uncontacted tribes or Indigenous Peoples, high-risk governance environments, ecologically sensitive areas, biodiversity-critical zones, and areas associated with the seabed and deep-sea mining operations.

Polestar requires business partners to implement and screen their supply chain against the Risk Area List and to cascade these requirements throughout their supply chains to help ensure that neither their own operations nor those of their suppliers and sub-suppliers source from or operate in prohibited or restricted risk areas. The list is reviewed and

updated regularly to reflect evolving risk conditions, regulatory developments, and stakeholder expectations.

3.3 Taking action on transparency

Based on our guiding policies and objectives on transparency, as well as insights from our assessment of risks and opportunities, we have implemented two strategic initiatives through Polestar's Sustainability Strategy, Supply chain transparency and Consumer transparency.

3.3.1 Supply chain transparency

Polestar establishes material-specific transparency and traceability requirements through supplier contracts, car program requirements, and associated appendices with its business partners. The required transparency actions are determined based on the raw material and its associated human rights, environmental, governance and supply chain risks. As a result, traceability requirements may vary between materials and may include supply chain mapping, chain of custody verification, certification, or end-to-end traceability.

Business partners shall implement the applicable traceability requirements and cascade them throughout their supply chains. For example, battery raw materials with elevated risks of forced labour, child labour, corruption, or governance issues may be subject to enhanced traceability requirements, while aluminium may be subject to supply chain mapping and related data collection requirements to support climate and decarbonisation objectives.

Polestar applies a risk-based approach to traceability, with higher-risk materials prioritized for verification and traceability. To support a consistent approach across supply chains, Polestar defines three levels of traceability maturity, described below.

Level	Name	Description
1	Mapped Raw Materials	Supply chain mapped across tiers, but information may be partial or high-level. No full chain of custody.
2	Certified Raw Materials	Verified through recognised third-party certification schemes. Higher assurance, but may not be fully end-to-end.
3	Fully Traced Raw Materials	Complete, validated chain of custody using documentation + advanced verification technologies + audits. End-to-end traceability achieved.

3.3.1.1 Level 1 — Mapped supply chain

Mapped raw materials are those for which Polestar has established documented visibility across all tiers of the supply chain—from the finished vehicle back to the mine site. This tier-by-tier mapping must include, at minimum, country of origin **and/or** region and mine or site details such as name or address (when available).

3.3.1.2 Level 2 — Certified chain of custody/material supply chain

A certified chain of custody or certified material supply chain refers to raw materials that are verified through recognised, independent third-party certification systems. These schemes confirm compliance with defined standards for origin, production practices, and chain-of-custody controls across the supply chain. Examples include the Aluminium Stewardship Initiative (ASI) Chain of Custody and the Copper Mark Chain of Custody, among other relevant certification systems.

Certified materials provide a higher level of assurance than mapped materials, but they may still lack full end-to-end traceability if all upstream tiers are not yet covered.

3.3.1.3 Level 3 — Fully traced supply chain (end-to-end chain of custody)

This represents the highest level of traceability maturity, requiring a fully validated end-to-end chain of custody from extraction to final product. Material origin, movement, and transformation must be continuously confirmed through interoperable digital systems capable of independent verification across all tiers of the supply chain.

To fulfil this requirement, suppliers may use blockchain or other distributed-ledger-based infrastructures that provide tamper-resistant, high-integrity records, apply AI-driven verification tools to identify anomalies, inconsistencies, and irregular data patterns, use open data and geospatial intelligence, including satellite monitoring and trade-flow information, to independently corroborate supplier-reported claims. Suppliers may also participate in recognised collaborative data-sharing initiatives, such as RBTP or the UN Transparency Protocol (UNTP), to ensure standardised, interoperable, and cross-actor traceability across global supply networks.

3.3.2 Consumer transparency

Polestar shall disclose Sustainability credentials for all vehicle models to enable informed consumer choice and promote transparency. These sustainability credentials may include, but are not limited to:

- Climate impact in terms of Life Cycle Assessments (LCAs) for all models
- Traced materials
- Recycled content
- Material innovations
- Animal-welfare-verified materials where applicable
- Human rights related information

The scope and level of detail of disclosed information may vary depending on data availability, material relevance, traceability maturity, regulatory requirements, and stakeholder expectations. Sustainability credentials shall be made publicly available through Polestar's customer-facing channels and presented in a clear, accessible, and understandable manner.

3.4 Tracking and monitoring transparency performance

To support the effective implementation of this Statement, Polestar establishes measurable transparency objectives and key performance indicators as part of its sustainability governance framework. These indicators are used to monitor performance, measure progress against targets, identify gaps, and drive continuous improvement in supply chain transparency.

Polestar shall monitor implementation and effectiveness through defined transparency indicators, including:

- Number of traced risk materials
- Number of newly added risk materials
- Status of risk material-specific action plans
- Traceability levels achieved for priority materials
- Consumer Transparency Index

Progress, performance, and identified gaps shall be reviewed regularly by Global Function Sustainability. Significant risks, material deviations, or failures to meet established objectives shall be escalated to the Executive Committee and, where appropriate, the Board of Directors for review and decision-making.

3.5 Reporting and communicating on transparency

We commit to transparent communication and reporting on our transparency and traceability efforts and progress. We work to ensure that our stakeholders, both internal and external, are informed through:

- sustainability and transparency updates to the Executive committee, and Board of Directors, including progress on transparency objectives, traceability initiatives, action plans, and key performance indicators.
- internal governance forums, steering committees, and car program reviews, where relevant transparency and traceability matters are discussed and monitored.
- internal communication channels, including the Polestar intranet, town halls, and other employee communications, where we share news, developments, and progress related to transparency and traceability.
- training and awareness activities for employees, aimed at building knowledge and capability related to responsible sourcing, traceability, supply chain transparency, and applicable regulatory requirements.
- dashboards, reports, and other internal monitoring tools used to track transparency objectives, traceability maturity, material coverage, action plans, and related performance indicators.
- the annual Sustainability Report and other relevant public disclosures, where we report on the year's progress, material developments, objectives, and performance related to transparency and traceability.

- Polestar.com, customer-facing transparency platforms, product sustainability disclosures, newsletters, and other communication channels, where we provide sustainability and traceability information relating to our vehicles, materials, and supply chains.
- engagement with suppliers, industry initiatives, investors, customers, and other stakeholders, through which we communicate progress, share learnings, and gather feedback on transparency and traceability matters.

3.5.1 Principles for Sustainability reporting

Transparent sustainability reporting relies on robust processes for collecting, managing, verifying and communicating sustainability information. These processes help ensure that disclosures are accurate, reliable and decision-useful, enabling informed decisions by stakeholders while supporting accountability, compliance and trust.

Polestar applies the following principles to support credible and transparent sustainability reporting:

- **Consistent information**
Information shared across sustainability reports, digital channels, press materials and other communication is clear, aligned and not misleading or selectively presented, and does not extend beyond what can be substantiated by underlying data and disclosures.
- **Traceable data**
Data, methodologies, assumptions and significant judgements are documented, retained and subject to appropriate controls to support validation, audit and assurance activities. Limitations, uncertainties and estimation techniques are transparently disclosed where relevant.
- **Clear accountability**
Roles, responsibilities and decision-making authorities for sustainability disclosures are clearly defined. Appropriate review, challenge and approval processes are in place to support reporting quality, completeness and compliance.
- **Timely disclosure**
Disclosures are made regularly and reflect the most current, material and decision-useful information available, and are presented in a way that supports comparability over time where possible.
- **Substantiated claims**
Sustainability-related statements and claims are substantiated, proportionate, and communicated in a way that avoids greenwashing or overstating performance, progress or impact. Where relevant, claims are supported by recognized methodologies, clearly defined boundaries, and transparent assumptions.

- **Balanced disclosure**

Sustainability reporting reflects both positive and negative impacts, opportunities and challenges. Material information is not omitted, obscured or selectively presented, enabling stakeholders to form a balanced understanding of Polestar's sustainability performance and commitments.

3.6 Remediating transparency-related adverse impacts

Where Polestar identifies actual or potential transparency-related adverse impacts, appropriate corrective actions shall be taken. Where Polestar has caused or contributed to an adverse impact, it shall provide for or cooperate in remediation, as appropriate.

Polestar shall use its due diligence, grievance, and monitoring processes to identify, address, and remediate adverse impacts related to transparency, traceability, and sustainability information. Where material discrepancies, inaccuracies, omissions, or changes affecting previously communicated transparency-related information are identified, they shall be addressed through established governance processes and corrected or clarified in a timely and transparent manner.