



McLarens Global Ethics Policy

Owner: Liz Tubb

Version: V1.1

Updated: July 2023

mclarens.com

Document History

Date	Version	Updated by	Changes Made	Sign off
June 22	V1	L Gray	Creation	Liz Tubb
July 23	V1.1	B Paul	Annual updates	Liz Tubb

Document Distribution

Date	Version	Location	Distributed to
June 22	V1	McLarens Intranet	All staff
July 23	V1.1	McLarens Intranet	All staff

If you have any suggested changes to this procedure, please notify:

Liz Tubb, Group General Counsel

Scope

This policy applies to all individuals working at all levels and grades within the Group globally, including directors, senior managers, officers, employees (whether permanent, fixed term or temporary), trainees, seconded staff, homeworkers, casual workers, agency staff, volunteers and interns. However, we also expect that our all of our business partners globally conduct their business ethically and that they too comply with this policy.

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Our Culture and Values

McLarens values each employee individually for the unique contribution each person brings. Working collaboratively is an essential part of utilizing each employee's expertise. Teamwork is central to forming the best solutions, by drawing upon different experiences. Each employee is seen as an invaluable contributor to our success; in recognition of this, McLarens has a supportive, rewarding and accepting working environment.

As part of our culture, we expect employees to:

- Respect each individual employee for the value that they bring. Our differences make us stronger, working on this difference professionally is vital.
- Help to create a supportive environment.
- Look out for one another. Each of us has responsibility to ensure the health, safety, and security of our co-workers.
- Be proactive and do your part.

Our commitment to every employee

McLarens is committed to inclusion. We do not tolerate inappropriate comments, offensive behaviour nor harassment in any kind. Employees deserve freedom to do their jobs in a respectful, professional environment. Please refer to the **DE&I Charter** and the **Global Recruitment Charter**.

McLarens is committed to the safety of its employees. Intimidation and violence towards anyone are strictly forbidden. Firearms, knives, or other dangerous weapons should never be brought onto Company property. Abuse of alcohol or drugs can also pose a threat to our own health and safety, as well as the wellbeing of others. We must follow appropriate alcohol laws and Company policies and avoid excessive drinking at any work-related events.

McLarens is determined that no one suffers in silence. If you have knowledge, witness, or experience any issues, contact your line Manager or Human Resources or utilize our Whistleblowing policy which can be found on the McLarens Intranet.

Responsible Business

We at McLaren's recognise that we have a responsibility to the community, environment, and human rights.

The Environment

Globally we require that our managers implement environmentally friendly measures, share ideas, and ensure that all employees work towards McLaren's Global Responsibility Business Goals. The environment is a top priority for McLaren's. We recognise our obligation to manage environmental risks and reduce our impact on the environment wherever possible.

McLaren's has a [Global Responsibility Committee](#) which oversees environmental initiatives and encourages environmental projects throughout the globe. Please see the [Global Responsible Business Statement](#) which further outlines our commitment, McLaren's has partnered with Planet Mark to calculate our global carbon footprint and to commit to reducing it by 2.5% year on year.

Charitable giving

McLaren's is very conscious to give back to the local community. As such, employees at McLaren's are encouraged to participate in McLaren's Annual [Day of Service](#). This provides each employee with a day of paid leave to support a community organization of their choice. This could include supporting a charity that is important to them personally or identifying a new charity with whom they can develop a relationship with. The Day of Service can take place anytime throughout the year.

McLaren's employees collectively participate in approximately 2,000 hours of community service.

For instance, our Ukraine Initiative that took place in early 2022 in the UK; some employees got involved with the White Eagle Appeal and donated backpacks to the children seeking an education, who had been displaced in Poland due to the war. Other initiatives include individuals in Latin America who have been volunteering for MAI Panama Foundation that seek to provide therapeutic art activities. In February, the McLaren's CommUNITY Foundation sponsored Miami's Reinsurance Gold Foundation 2022 which supported Voices of Children Foundation. McLaren's continues to encourage CommUNITY work across the globe.

Human Rights and the Rule of Law

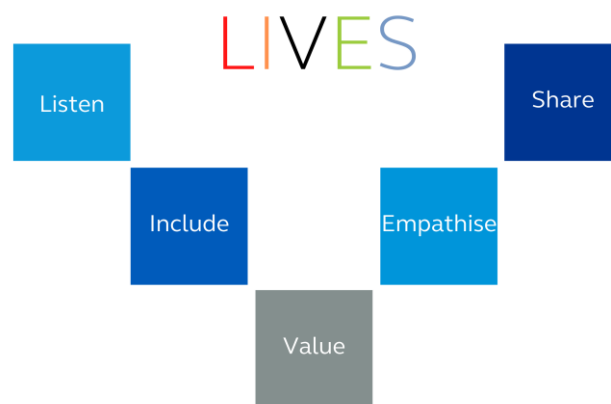
McLaren's has [Modern Slavery Statements](#) and policies in place throughout the globe. Our business respects the human rights and dignity of all. We strongly support all international efforts to protect human rights. Use of modern slavery and human trafficking still goes on today. We have a responsibility to be alert to the risks and report any concerns.

McLaren's will never tolerate clients, partners or third parties practicing modern slavery and human trafficking. Each of us must support efforts to eliminate any abuses of human rights. Respect for others begins with our daily interactions, including promoting diversity, accommodating disabilities and being proactive to protect the dignity of everyone.

Diversity & Inclusion

Diversity and Inclusion Matters. McLaren has recently updated our Global Charter to reflect our commitment to Diversity & Inclusion. We also have both an external and internal section of our website detailing all that we are doing to encourage the diversity and inclusion within our company. The diversity of our global team is our most important resource. Each person offers unique ideas, beliefs and skills shaped by their heritage, background, culture, race and gender.

McLarens Core Values, also known as LIVES, are:



We have 3 steps to achieving our values.

1. **Diversity Champions**: colleagues who have volunteered to take on this important challenge. They take on a wide range of roles across our business to build inclusive communities at local level.
2. Our **Diversity & Inclusion Teams** around the globe each include a Diversity & Inclusion Lead, an Executive Sponsor and local Leadership Team members. They work with our D&I champions, meeting regularly to discuss, educate, share ideas, and implement initiatives to further McLaren's D&I strategy.
3. Our **Diversity & Inclusion Global** Taskforce comprises of members of our Executive Leadership team. Adopting a highly proactive approach to managing our Global strategy, it provides the vision and direction required to deliver our goals.

Responsibility and trust

McLarens operates honestly and transparently when working with our customers, business partners and colleagues. Further examples are contained in **Global Business Conduct Policy**. We are committed to fulfilling all contractual obligations and ensuring that our services always meet our high standards for quality.

McLarens expects all employees to:

- Treat others fairly and honestly. Always to keep confidential information and never conceal important information.
- Maintain quick responses to requests from customers and never follow a request to do something unlawful or contrary to this Code or other McLarens policies.
- Respect all intellectual property. This includes trademarks, copyrights, patents and proprietary information and trade secrets of anyone with whom we do business.
- Never provide information to those that you are not authorised to share with.
- Make promises only on promises that we can deliver.
- Report any concerns that a business partner may not be meeting our standards, or their contractual obligations.

Each of us is responsible for protecting McLarens property and assets. This includes our facilities, equipment, computers and information systems, confidential information, inventory, supplies and funds. For more information, see our [Global Acceptable Use policy](#).

Respecting Privacy

Gathering Competitive information: when collecting business intelligence and information, employees and others who are working on our behalf must **never engage in fraud, misrepresentation or deception** to obtain information or use technology to 'spy' on others. When we hire employees of competitors, we must respect valid legal obligations of those employees and not encourage them to disclose protected information of their former employers

Protect the Privacy of Others. We expect all employees to keep confidential information safe and secure. Good privacy and data security practices are vital. During our work, we have access to personal, confidential, or proprietary information about McLarens, our employees, our customers or other third parties. We must keep confidential information secure by applying our security controls and using the information only for permitted purposes. The obligation to preserve confidential information is ongoing, even after employment ends.

All employees must review the [Global Information Security Policy](#) and the [Privacy Statements](#) to understand the company's approach to security and privacy. We expect all employees to safeguard our corporate information. We also expect all employees to follow their local [Data Protection Law](#) and the Privacy Statement's for each country can be found on our website. For any uncertainty, contact the Group General Counsel and the Director of Information Security Technology Services.

Records and Retention

Those at McLarens have a strict retention and destruction obligations to follow. Document retention and destruction actions must always be consistent with the law, contractual obligations, and our Company policies. It is also crucial that we comply with any “legal holds” that require records to be maintained beyond typical retention schedules when there is current or anticipated litigation. Never destroy, alter or try to conceal any documents that may be necessary for an investigation or litigation. For further information, please review our [Global Retention and Destruction Policy](#).

Confidentiality

McLarens expects employees to:

- Avoid sharing confidential information with anyone who does not have a legitimate “need to know”.
- Never discuss confidential information in public areas, or at work in the presence of employees not authorised to have access to the information.
- Use care and ensure authority has been obtained when you provide personal data about employees to anyone outside McLarens.
- Immediately report the loss of any misplaced information that should be protected.

What is confidential information?

Any information that is not publicly available. This includes:

- Non-public information about McLarens.
- Information about any acquisitions, Company investments or potential affiliates.
- Written and verbal agreements between employees and McLarens, agents, strategic partners or other third parties.
- Compensation and bonus arrangements.
- Personnel or employee information.
- Medical information of customers or prospective customers.

If you are unsure about any information classification, please consult the Group General Counsel.

Integrity

Conflicts of Interest

We must avoid conflicts of interest in our business and personal activities. A conflict of interest can arise when our personal interests/ activities affect our ability to make objective decisions on behalf of McLaren.

All employees and directors are required to report any real or perceived conflicts of interest as they arise as part of our [Conflicts of Interest Policy](#).

If you are ever in any doubt, discuss with your manager or the Compliance Officer, Liz Tubb.

Anti-Bribery and AML

McLarens has a strict [Anti-Bribery Policy](#) and an [Anti-Money Laundering Policy](#) which we expect all employees to adhere to. All employees must also follow their local laws.

A bribe is an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory or personal advantage. Bribery puts our business at significant risk. If you have any concerns that dishonest practices are occurring, report them. For reporting details see the policy. Do not stay silent and on no account offer or accept bribes.

Money laundering is the process to move illegally acquired cash through financial system so that it appears to be from a legitimate source. Money laundering is illegal and strictly forbidden. We expect any suspicious activity to be reported to the Group General Counsel.

Gifts and hospitality

McLarens generally permits giving and receiving business gifts that are reasonable and not excessive. The gifts must be consistent with local laws. Be careful, gifts or the receipt of hospitality can be construed as a bribe, even if that was not the intention.

If giving a gift, seek approval from your line manager and review the [Anti-Bribery & FCPA Policy](#). Any gift over USD \$100 or the local equivalent are required to be reported to the Group General Counsel.

Any corporate entertainment we offer should be proportionate, reasonable, and appropriate to the circumstances and offered in good faith. Entertaining should be agreed with your manager in advance.

Transparency

Fraudulent activity

Our customers and other rely on us to comply with financial reporting and accounting regulations to ensure accounting and financial information is accurately reported. It is crucial to our reputation that we immediately report any fraudulent activity; failing to do so will lead to serious disciplinary action. For further information please consult our [Anti-Bribery, Criminal Finance Policy and FCPA Policy](#).

Economic Sanctions Policy

Certain countries' governments administer a number of embargoes and other sanctions and trade restrictions that prohibit affected persons and businesses from interacting with certain targeted countries, entities and individuals. McLarens has a strict sanctions screening process in place which all employees are obliged to follow. For further information, consult the [Economic Sanctions Policy](#) or consult the Group General Counsel.

Our Public Communications

McLarens recognizes that social media is a way for us to conduct work-related communications and share information with others. What you post on your social media, is a reflection of McLarens. We therefore require that any posts about McLarens are in line with our policies and guidelines. Any individuals unsure about this should consult Global Communications.

If you read an online comment about McLarens that you believe to be wrong or harmful to our reputation, do not respond; rather, bring it to the attention of the Compliance Officer or Communications Department.

McLarens Global Communications team has exclusive responsibility for McLarens public statements. Global Communications works together with their colleagues to ensure accuracy and delicacy when making any form of public statement. In limited circumstances, select individuals might be authorised to provide public statements on behalf of McLarens with pre-approval from Global Communications.

There are restrictions which apply to all McLarens public statements, including:

- No speculation on changes or projections on McLarens financial position.
- No comments on rumours concerning acquisitions, mergers, management changes, affiliates or other significant business events.
- No disclosure of proprietary information regarding products, policies or strategies.
- No reference to any financial information that has not been publicly disclosed.
- No discussion or reference to specific competitors.

For further restrictions, please consult the [Social Media Policy](#).

Following the Ethics Code

McLarens will not tolerate any violation of this Ethics Policy, nor breaches of any the Policies aforementioned. Any violations will result in disciplinary action and could result in serious consequences, including termination.

McLarens recognises that no policy can cover every eventuality; any of us may require advice and support of others to address some of the situations that arise during the course of daily business life, we promote a consultative culture at McLarens. In addition to established internal relationships and management, we have a supportive network that is available for consultation to help one another live up to our commitments under the Code of Ethics.

Further information

Please note, all policies referred to in this document can be found on the McLarens SharePoint.

Should you have any queries about this policy or want further clarification please contact the Group General Counsel, Liz Tubb.