



Supplier Code of Conduct

Owner: Liz Tubb

Version: V1.1

Created: July 2023

Document History

Date	Version	Updated by	Changes Made	Sign off
Jun 2022	V1.0	L Gray	Creation	Liz Tubb
July 2023	V1.1	Beatrice Paul	Annual review	Liz Tubb

Document Distribution

Date	Version	Location	Distributed to
June 22	V1.0	McLarens Intranet	All staff
July 2023	V1.1	McLarens Intranet	All staff

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

Liz Tubb, Group General Counsel

Contents

Introduction	4
1. Compliance	4
2. Employees and Service Users	1
Respectful treatment	1
Professional behaviour	1
Meeting user needs	1
Vulnerable users	1
Human rights and employment law	1
3. Business practices	2
Management of risk	2
Continuous improvement	2
Data Quality	2
Reputation and Public Trust	3
Cyber Security	3
Sustainable Procurement	3
Confidentiality, Data and Ownership	3
Conflicts of Interest/Antitrust	3
4. Standards of Behaviour	4
Ethical behaviour	4
Counter Fraud and Corruption	4
Treatment of Supply Chain	4
Health and Safety	4
Corporate Governance and Corporate Social Responsibility	5
Use of McLaren's facilities and network	5

Introduction

The overall objective of the Supplier Code of Conduct is to build trusting and open relationships between McLarens* and suppliers/vendors in order to drive and improve performance, when we use their services. This Supplier/vendor Code of Conduct acts in a reciprocal way and sets out the behaviours we would expect of each other.

In selecting suppliers/vendors, McLarens checks that it is contracting with reputable bodies.

As we move from procurement to the life of the contract, we expect that delivery should be in accordance with the spirit of the contract, as well as its letter. We expect our suppliers, in delivering goods and services to, wherever they operate, to act in a manner that is compatible with our values and uphold the reputation of McLarens.

We recognise that in many cases a supplier/ vendor can only be as good as its customer, so in return, suppliers/ vendor can expect us to place risk with the party best able to manage it, create the right conditions for innovation and create a culture of collaboration between suppliers/ vendors, subcontractors and McLarens and pay promptly.

McLarens is committed to maintaining a high standard on human rights and fair labour practices in its supply chain. We expect our employees to treat suppliers/ vendors with fairness and respect and to work jointly with suppliers/vendors to build trusting, collaborative, and constructive working relationships. In return we expect suppliers/ vendors to treat our employees in the same way, and to work with us to build those trusting, collaborative and constructive relationships that are focused on delivering for clients.

This Supplier Code of Conduct is intended for all those who avail such goods/services across McLarens globally. We expect our suppliers/ vendors to communicate this Supplier Code of Conduct to employees, their parent company, subsidiaries and subcontractors; our commitment is that we will communicate it to our employees.

All our suppliers/vendors are expected to go through our audit program which will ensure that they comply with various legislation and codes of conduct. Suppliers that behave in a manner that is unlawful or inconsistent with this policy, risk termination of their business relationship with McLarens.

1. Compliance

The Supplier Code of Conduct is intended to set out the way in which we and our suppliers/ vendors will behave towards each other. It is not intended to be legally enforceable, to create any legal obligations or rights or to undermine our contracts with suppliers/vendors or the rules we set out when we procure our goods and services, which always shall take precedence. For the avoidance of doubt, the Supplier Code of Conduct does not take precedence where the courts or other institutions such as a regulatory agency, authority or body have jurisdiction.

Both parties should be open and transparent with each other and report any instances of non-compliance. In these circumstances, the first step is for the McLarens and the supplier/ vendor to discuss and, where appropriate, agree suitable remedial actions. If a party considers that an issue has not been resolved by discussion, it may escalate it to the Group General Counsel, liz.tubb@mclarens.com.

2. Employees and Service Users

Respectful treatment

Our employees, those of our suppliers/ vendors, and service users have the right to respectful treatment. We will not tolerate discrimination, harassment or victimization in the workplace or in connection with any government service. We expect our suppliers/ vendors to provide the same commitment, including to their own employees. [The Equality Act 2010](#) protects against discrimination, harassment, and victimisation.

Professional behaviour

We will work constructively and collaboratively with our suppliers/ vendors. We expect suppliers/vendors to be prepared to invest in their relationships with McLaren and establish trust with our staff and with other suppliers/ vendors involved in delivery. We also expect suppliers/ vendors to speak out, without fear of consequences, when a project or service is unlikely to succeed because of our behaviours or a lack of good governance. We expect the same behaviour when a contract is no longer fit for purpose, for example, in its contractual stipulations or measures.

Meeting user needs

It is important that contracts with our suppliers/ vendors meet the needs of service users. We will work together with suppliers/ vendors to articulate these outcomes to ensure that the goods and services being provided meet the needs of users and we expect fully reciprocal behaviour from suppliers/ vendors.

Vulnerable users

Some contracts deliver services to service users with particular needs such as physical or mental disabilities, medical conditions or other factors that place them in a vulnerable position. Suppliers/ vendors will ensure that these service users are treated at all times with courtesy and that their dignity, safety, security and well-being is always treated as a priority concern. Where appropriate we will request that suppliers/vendors comply with our various vulnerable customer policies.

Human rights and employment law

McLarens and suppliers/ vendors must both comply with all applicable human rights and employment laws in the jurisdictions in which they work. This includes complying with the provisions of the Modern Slavery Act 2015 and with other Modern Slavery legislation. In addition, suppliers/ vendors must have robust means of ensuring that the subcontractors in their supply chain also comply.

Prohibit the use of child labour. Child labour must not be used under any circumstance. Suppliers must not employ anyone under the age of 15, under the age for completing compulsory education, or under the legal minimum working age for employment, whichever requirement is most restrictive. Suppliers are required to have a remediation plan in place to ensure that, in the event of any child labour found, Suppliers must follow

international standards, local legal requirements, or McLarens child labour remediation requirements. McLarens supports all forms of legal youth employment, including the development of legitimate workplace apprenticeship programs for the educational benefit of young people. McLarens will not do business with any Supplier that uses such programs in a fraudulent or deceptive manner. Suppliers must prohibit workers who are under the age of 18 from performing work that is likely to jeopardize their health or safety such as night work, overtime, heavy lifting and working with toxic or hazardous materials.

3. Business practices

Management of risk

Our aim is to ensure that risk is allocated to the party best able to manage it. To assist us in making that judgement we will, where appropriate, engage with the market to understand its views in order to make informed decisions. We do not expect suppliers/vendors or government to be made responsible for managing a risk that is best managed by the other party. We expect suppliers/ vendors not to pass down risk inappropriately to subcontractors, and not to assert that they can manage risk that is in fact better managed by McLarens. All parties should be prepared to share intelligence of supply chain risks, so that material commercial and operational risks, for example the impact of losing a key supplier/vendor, can be mitigated. We require suppliers/vendors of critical services to develop resolution plans, deployable in the event of a corporate insolvency to ensure that critical services continue.

Continuous improvement

We expect our suppliers/ vendors to use recognised industry practices in the delivery of goods and services to, or on behalf of, McLarens. We also expect suppliers/vendors to continuously improve these goods and services and bring innovation, ideas and expertise to help McLarens address its strategic challenges and to support growth and prosperity globally. We will endeavour to create the right conditions to allow suppliers/vendors to innovate both during the procurement process and the life of a contract and where appropriate we will inform suppliers/vendors of our innovation requirements during the procurement process.

Data Quality

A robust delivery model, including its pricing structure, is dependent on the quality of data on which it is based. McLarens will provide accurate data and/or build in flexibility (consistent with procurement legislation) to allow for subsequent validation of data, particularly where new services are being provided, for example, using pilots. For McLarens to be able to do this, where a contract is being re- procured, we will require incumbent suppliers/vendors to act in a timely manner and be forthcoming with information required for scoping the re-procurement and the tendering process (for example workforce information) and to behave in accordance with any required standards. As per the contractual obligations, this information should be provided promptly when requested by McLarens and updated as required, for example, during any transitional phase leading to transfer of the provision of the services

Reputation and Public Trust

We want to work with suppliers/ vendors who are proud of their reputation for fair dealing and quality delivery. We want working with McLaren's to be seen as reputation enhancing for the supplier/ vendor. We expect all parties to be mindful of the need to maintain public trust and protective of McLaren's reputation, and ensure that neither they, nor any of their partners or subcontractors, bring McLaren into disrepute by engaging in any act or omission which is reasonably likely to diminish the trust that the public places in McLaren. This is not intended to limit any supplier's/vendor's legal obligations or constrain whistleblowing or their ability to fairly criticize a McLaren body or policy.

Cyber Security

It is essential that suppliers/vendors safeguard the integrity and security of their systems and comply with the relevant McLaren standards and guidance. Suppliers/ vendors must inform the [Director of Information Security](#) if they become aware of any cyber security incident that affects or has the potential to affect McLaren data or the data of our customers.

Sustainable Procurement

The McLaren Group has a responsibility to do all we can to eliminate or minimize the impact of our business on the environment and we expect our suppliers/vendors to do the same. McLaren is committed to protect and enhance local and global environments and will ensure that our business activities are carried out in an environmentally, socially and ethically sustainable way.

Confidentiality, Data and Ownership

McLaren and suppliers/ vendors are both expected to comply with the provisions in our contracts and any legal requirements to protect commercial and sensitive information. McLaren and suppliers/vendors may both also be party to confidential information that is necessary to be effective partners. This information, even if it is not covered by contractual provisions, should be handled with the same care as information of similar sensitivity.

We expect all suppliers/ vendor to follow all local privacy and data protection laws. Provide clear and accurate privacy notices when collecting or processing personal data. Honor privacy choices by using data only as agreed to by McLaren representatives or McLaren customers. Protect data by building secure products and services. Cooperate with McLaren Compliance efforts.

Conflicts of Interest/Antitrust

We expect suppliers/vendors to mitigate appropriately against any real or perceived conflict of interest through their work with McLaren. A supplier/ vendor with a position of influence gained through a contract should not use that position to, unfairly disadvantage any other supplier/ vendor or reduce the potential for future competition, for example by creating a technical solution that locks in the supplier's/vendor's own goods or services.

4. Standards of Behaviour

Ethical behaviour

We expect the highest standards of business ethics from suppliers/ vendors and their agents in the supply of goods and services.

Counter Fraud and Corruption

We demand that suppliers/vendors adhere to anti-corruption laws including, but not limited, to the Bribery Act 2010, and anti-money laundering regulations. We expect suppliers/vendors to have robust processes to ensure that the subcontractors in their supply chain also comply with these laws. We have zero tolerance of any form of corrupt practices including extortion and fraud that we become aware of, and we expect suppliers/vendors to be vigilant and proactively look for fraud, and the risk of fraud, in their business. Suppliers/vendors should immediately notify McLarens where fraudulent practice is suspected or uncovered and disclose any interests that might impact their decision- making or the advice that they give to McLarens.

Treatment of Supply Chain

We expect suppliers/ vendors to deal fairly with the subcontractors and suppliers/vendors in their supply chain. We expect suppliers/vendors to avoid passing down unreasonable levels of risk to subcontractors who cannot reasonably be expected to manage or carry these risks. We expect suppliers/vendors not to create barriers to the use of small and medium-sized enterprises who are qualified to provide goods or services, and to encourage innovation in their supply chains to increase the value or quality of supply.

Health and Safety

Suppliers/vendors should establish an occupational health and safety management system that, at a minimum, demonstrates that health and safety management is integral to the business, allows for leadership and encourages employee participation to set policy, roles, responsibilities, and accountabilities, provides for risk and hazard identification and assessment, and provides appropriate communication channels for employee access to health and safety information. This management system must include procedures and processes to address incident recordkeeping, investigation, correction action, and continual improvement.

Corporate Governance and Corporate Social Responsibility

We expect our suppliers/vendors to adhere to [The McLaren's Corporate Social Responsibility Statement](#) or follow equivalent good corporate governance principles underpinned by robust processes. We also expect our suppliers/vendors to be good corporate citizens by upholding the values of this Supplier Code of Conduct, taking into consideration social value legislation in delivering goods and services and supporting key McLaren's corporate social responsibility policy areas such as diversity and inclusion, sustainability, prompt payment

Use of McLaren's facilities and network

Suppliers must not use any McLaren's-provided facilities (e.g., buildings and site services) other than in performance of services provided to McLaren's without the prior written consent of McLaren's.

You may acknowledge the principles stated above or demonstrate your commitment via compliance with your own code of conduct or company policies that embrace these standards. McLaren's reserves the right to discontinue any relationship for non-adherence to principles, failure to correct violations, or displaying patterns of non-compliance with these standards. Should you have any concerns about illegal or improper conduct, please contact the responsible McLaren's Compliance support@mclarens.com,

YOU are part of our supply chain – McLaren's counts on your commitment!