



McLarens Global Ethics Policy

Owner: Liz Tubb

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mclarens.com

Document History and Distribution

Date	Version	Updated by	Changes Made	Sign off	Location	Distributed to
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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 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 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, 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.

McLarens is committed to adhering to all Human Rights and Equality laws globally that are applicable.

Responsible Business

We at McLarens 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 McLarens Global Responsibility Business Goals. The environment is a top priority for McLarens. We recognise our obligation to manage environmental risks and reduce our impact on the environment wherever possible.

We have engaged Planet Mark to externally validate our carbon impact as a company including Scope 1, 2 & 3 emissions. We are Planet Mark certified for a third consecutive year, and we are contributing to 8 United Nations Sustainable Development Goals (UN SDGs).

We have committed to an annual year on year 5% carbon reduction target (Scope 1 & 2) as well as setting Science-Based Targets with a clear path to reduce emissions in line with the Paris Agreement goal of limiting warming to 1.5°C above pre-industrial levels. These targets will help McLarens achieve Net Zero by 2050.

We have established a global ESG Steering Committee with external expertise from Sixty7.green (ESG advisors) to help us review policies and approaches, identify good practice, build team competencies and engage all staff, at all levels, in our approach to ESG.

Charitable giving/ McLarens Community

McLarens is very conscious to give back to the local community. As such, employees at McLarens are encouraged to participate in McLarens 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.

McLarens employees collectively participate in approximately 2,500 days of community service. We've created McLarens Volunteer Activity Tracker to be able to track the volunteer activity of our employees all over the world and recognize them for their efforts.

McLarens COMMUNITY supports various local charity initiatives across the globe, more information could be found on our Impact statement of the following link: [Sustainability and Environment - McLarens](#).

Human Rights and Modern Slavery

McLarens 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.

McLarens 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.

McLarens is vehemently opposed to the use of slavery in all forms; cruel, inhuman or degrading punishments; and any attempt to control or reduce freedom of thought, conscience and religion.

McLarens will ensure that all of its employees, agents and contractors are entitled to their human rights as set out in the Universal Declaration of Human Rights and relevant Human Rights Act depending on jurisdiction.

McLarens will not enter into any business arrangement with any person, company or organisation which fails to uphold the human rights of its workers or who breach the human rights of those affected by the organisation's activities.

Targets for 2026/2027 Financial Year

100% of employees are paid a proper living wage.

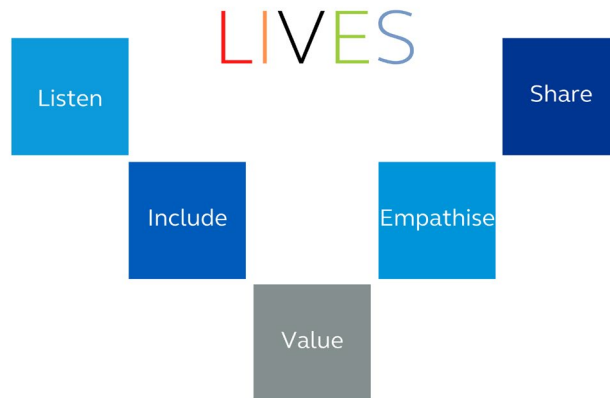
All employees have access to a Modern Slavery training course.

Ensure fair, safe, and legally compliant working conditions for all employees

Diversity & Inclusion

Diversity and Inclusion Matters. McLaren has recently updated our Global DE&I 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 valuable 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 collaborating 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 McLaren 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 McLaren's 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 McLaren's, 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 which 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 McLaren's 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

McLaren's 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 McLaren's.
- 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 McLaren's.
- Information about any acquisitions, Company investments or potential affiliates.
- Written and verbal agreements between employees and McLaren's, 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.

Fraud

Fraud involves any act of dishonesty intended to secure unfair or unlawful gain. This includes, but is not limited to, deliberate deception, false representation, concealment of information or abuse of position for personal benefit or to benefit McLaren, our clients or any associated parties.

McLarens has a zero-tolerance approach to fraud, whether committed for personal gain or benefit of our company, our clients, or any associated persons. McLaren maintains a strict Global Fraud Policy that employees are expected to understand and follow. In addition to our internal standards, employees must comply with all applicable local laws and regulations relating to fraud.

Employees are expected to help prevent, detect and report all forms of fraud, where they may occur. Any actual or suspected fraud must be reported immediately to the Group General Counsel.

Gifts and hospitality

McLarens generally permits the giving and receiving of business gifts that are reasonable and not excessive. Gifts must comply with applicable local laws and the Anti-Bribery & FCPA Policy. Care should be taken, as gifts or hospitality may be perceived as a bribe, even where no improper intent exists.

Any corporate entertainment should be proportionate, reasonable, appropriate to the circumstances, and offered in good faith, and must comply with the Anti-Bribery & FCPA Policy.

Professional Conduct

All employees are expected to uphold certain standards of behaviour both in the office environment and at work related events. Professional behaviour in the workplace is a combination of attitude, appearance, and manners, it includes the way you speak, look, act and make decisions.

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. McLaren 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 McLaren. We therefore require that any posts about McLaren are in line with our policies and guidelines. Any individuals unsure about this should consult Global Communications.

If you read an online comment about McLaren 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 McLaren public statements. Global Communications collaborates 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 McLaren with pre-approval from Global Communications.

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

- No speculation on changes or projections on McLaren 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](#).

Social Media

Personal social media use can still be associated with the organisation, so employees must ensure their online behaviour remains responsible and professional. Colleagues should avoid posting, sharing, or engaging with content that appears inappropriate, offensive, discriminatory, inflammatory, or inconsistent with the organisation's values. Employees are expected to consider how their online activity may be viewed externally and how it may impact the organisation's reputation or create conduct or safety concerns. If online activity is reported to the organisation, it will be reviewed and may lead to investigation and disciplinary action, up to and including dismissal.

All personal social media activity must comply with this 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.