

SUPPLIER CODE OF CONDUCT

JULY 2024



COMPLIANCE WITH **SUPPLIER CODE OF CONDUCT**

Our Suppliers shall ensure that the principles set out in this Code are complied with and are communicated and understood in their own supply chains.

For minor violations of this Code, appropriate corrective actions should be implemented within a reasonable timeframe. For serious violations (particularly in case of non-compliance with applicable laws), we reserves the right to impose appropriate sanctions against the respective Supplier. This can also lead to an immediate termination of the supplier relationship and the assertion of claims for damages and other rights.

**In case of doubt or questions, Suppliers
can contact;**

Uk.procurement@inchcape.co.uk

procurement@group1auto.co.uk



MAINTAIN OUR REPUTATION

We do not tolerate any form of corruption or other unfair business practice. Transparency and openness are essential requirements in order to ensure trust and credibility in business and in our dealings with Suppliers.

We therefore expect our Suppliers to:

- Ensure that bribery or corruption in any form is not tolerated.
- Avoid conflicts of interest that may lead to corruption risks. Invitations, gifts or other considerations should be appropriate and must not be given, or accepted, in return for preferential treatment.
- Ensure that remuneration paid to consultants, agents, brokers and/or other intermediaries does not serve to provide unfair advantage.
- Declare any conflicts of interest in any business dealing with us.
- Comply with all relevant competition laws. In particular, not to make agreements and arrangements that influence prices, conditions, strategies or customer relations, especially regarding participations in tender procedures. The same applies to the exchange of competitively sensitive information or for any other conduct that unlawfully restricts or may restrict competition.
- Observe compliance with all applicable laws regarding the import and export of goods, services and information as well as the laws on combating international terrorism.
- Take appropriate measures to prevent money laundering in their organisations.
- Ensure that confidential information obtained through business activities is held in strict confidence and not improperly used or disclosed to third parties.
- Ensure confidential information is stored appropriately to ensure it is not improperly disclosed when it is received, stored, transmitted or disposed of. Access to confidential information should be restricted to a need-to-know basis.
- Comply with all applicable laws for the protection of personal data, particularly of employees and customers.
- Report any crimes committed in the course of business activities which may have effects on our business,
- Choose their suppliers, which they retain in relation to their business activities for us, diligently and communicate the principles of this Code to them.



“We do not tolerate any form of corruption or other unfair business practice”

OUR COMMITMENT

TO EACH OTHER

We believe in creating a healthy, diverse and inclusive workplace for all, ensuring pay equality with remuneration and benefits that attract and retain diverse talent.

Social responsibility is a key factor for the long-term success of our company and consequently an indispensable element of our approach to Responsible Business.

We therefore expect our Suppliers to:

- Respect commonly accepted human rights.
- Reject child labour in all its forms and comply with applicable laws on the prohibition of child labour.
- Not tolerate any form of forced labour.
- Ensure it has taken the necessary steps to identify risks of modern slavery within its supply chain and take any necessary actions to mitigate modern slavery risks
- Treat its employees fairly and impartially, without bias, and to promote a harassment free workplace.
- Promote diversity within their organisations and not tolerate any discrimination with respect to hiring and employment
- of employees or within the workplace environment.
- Pay its employees a fair wage commensurate with prevailing industry conditions or the minimum wage, whichever is higher.



OUR COMMUNITIES

The brands we represent, the markets in which we operate and the customers we serve have unique characteristics.

We are committed to understanding, servicing and positively contributing to the communities in which it operates.

We therefore expect our Suppliers to:

- Respect the applicable laws regarding freedom of assembly and the formation of interest groups and protect the rights of their employees guaranteed in these laws throughout their organisations.
- Put the safety of people first by providing both a safe working environment and safety related qualifications as well as for the safety of their products and services.
- Seek to avert dangers to individuals and to promote and preserve the health of their employees by means of preventative occupational safety measures and good working conditions.





THE ENVIRONMENT

We understand that the automotive sector has a key role to play in achieving carbon neutrality. We, and our OEM partners, are taking steps to contribute towards that goal. We ask our Suppliers to also play their part.

We therefore support suppliers who take a responsible approach to:

- Managing, measuring and reporting their energy and greenhouse gas emissions.
- Understanding the climate related risks in their operations and their impact on the environment.
- Improving energy efficiency within their operations.
- Managing their waste and recycling appropriately.

These and other environmental factors may be used during the decision-making process when selecting Suppliers.

