

A decorative graphic on the left side of the page consisting of several overlapping, diagonal brushstrokes in various colors including yellow, red, blue, purple, and grey, creating a sense of motion and energy.

CODE OF CONDUCT

FOR SUPPLIERS

FINDING WHAT YOU NEED

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INTRODUCTION TO INCHCAPE

Inchcape plc is an independent automotive distributor with global scale. Our business is the distribution and retail of passenger cars, commercial vehicles and trucks and parts for many of the world's leading automotive brands.

Inchcape has a long and successful history of international trade based on a pioneering approach and spirit of innovation. As a trading company, we have a strong track-record of successful expansion – developing new businesses in markets we know well and entering new geographies with familiar businesses. Combined with considerable local freedom to innovate and pursue opportunities, these traits have grown Inchcape from its origins as a merchant trading company over two centuries ago to the international automotive services group we are today. While the goods and services provided by Inchcape have changed our purpose retains this same pioneering spirit and ambitious global outlook:

“Bringing mobility to the world’s communities – for today, for tomorrow and for the better.”

INCHCAPE CODE OF CONDUCT FOR SUPPLIERS

In this Code of Conduct for Suppliers (**Code**), Inchcape has defined its requirements and principles for its business dealings with its Suppliers (**for example, companies or people that provide goods or services to Inchcape as well as consultants and agents.**) Inchcape expects its Suppliers to implement and comply with the principles set out in this Code throughout their organisations worldwide and related supply chains.

General Principles

Our approach to Responsible Business is built on four pillars: People, Places, Planet and Practices. This Code reflects those pillars. We believe that acting as a Responsible Business is a driver of commercial success and therefore forms an important foundation for our relationships with our Suppliers.

We therefore expect our Suppliers to:

- Conduct their business activities with integrity, and, to comply with applicable laws in all markets in which they operate. These include laws to protect human rights, anti-corruption laws, data protection laws, competition and antitrust laws and environmental laws,
- Promote compliance with the Code on the part of their own suppliers and sub-contractors, and
- Act honestly, responsibly and fairly in their practices and their business dealings.



SPEAK UP!

OUR WHISTLEBLOWING HOTLINE

The content of this Code reflects Inchcape's own Code of Conduct for employees of Inchcape. It is built upon the same underlying principles.

Inchcape has implemented a Whistleblower Policy making it possible for all Inchcape employees to make confidential reports of any concerns that they may have about suspected wrongdoing within the organisation. This includes misconduct, unethical behaviour, violations of the Inchcape Code of Conduct, or breach of applicable laws, rules, or regulations.

Equally, if any Supplier, or any employee of any Supplier, becomes aware of any suspected wrongdoing by Inchcape, by any employee of Inchcape, or by the Supplier itself then we also make the whistleblowing line available to them. Reports can be made confidentially through Speak Up! secure website, www.inchcape.ethicspoint.com operated by NAVEX Global, an independent company.

If a report is made into the conduct of a Supplier, the Supplier in question shall assist with the investigation and provide access to any information reasonably requested by Inchcape. Suppliers are also expected to take action to prevent, detect, and correct any retaliatory actions towards whistleblowers. If remediation is required, the Supplier will devise and inform Inchcape of their corrective action and implementation plans and timeline to resolve the breach promptly.



PRACTICES

An aerial, high-angle photograph of a large, dense crowd of people. The image is heavily blurred with motion blur, creating a sense of rapid movement and activity. The people are packed closely together, and their colors are streaked and blurred. The word "PRACTICES" is overlaid in large, white, bold, sans-serif capital letters across the center of the image.

OUR COMMITMENT TO PROTECT AND **MAINTAIN OUR REPUTATION**

Inchcape does not tolerate any form of corruption or other unfair business practice. Transparency and openness are essential requirements for Inchcape 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 Inchcape.
- 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 Inchcape, through the existing reporting systems.
- Choose their suppliers, which they retain in relation to their business activities for Inchcape, diligently and communicate the principles of this Code to them.

“Inchcape does not tolerate any form of corruption or other unfair business practice”

PEOPLE

OUR COMMITMENT

TO EACH OTHER

Inchcape believes 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.



PLACES

A long-exposure photograph of a city street at night. The image shows light trails from cars and buildings, creating a sense of motion and urban energy. The word 'PLACES' is overlaid in large, bold, white capital letters in the center of the image.

OUR COMMITMENT TO **OUR COMMUNITIES**

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



PLANET

An aerial, top-down view of a winding asphalt road that curves through a dense, lush green forest. Two cars are visible on the road: a yellow car on the left side of the curve and a red car on the right side. The word "PLANET" is superimposed in the center of the image in large, bold, white, sans-serif capital letters. The background has a motion blur effect, with green streaks radiating outwards from the center, suggesting speed or a dynamic environment.

OUR COMMITMENT TO **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.

We may use these and other environmental factors during the decision-making process when selecting Suppliers.



COMPLIANCE WITH INCHCAPE CODE OF CONDUCT FOR SUPPLIERS

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), Inchcape 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 Inchcape within the country in which they operate.

