

A collection of thick, diagonal lines in various colors (yellow, red, blue, purple, grey) on the left side of the slide, creating a sense of motion and energy.

CODE OF CONDUCT



A MESSAGE FROM OUR CEO

BRINGING MOBILITY TO THE WORLD'S COMMUNITIES;
FOR TODAY, FOR TOMORROW & FOR THE BETTER

Dear colleagues,

Our purpose compels us to make a positive contribution to the communities where we work. To achieve this requires Inchcape to do the right thing and to act responsibly towards our colleagues, our OEM partners, suppliers and our customers. This is part of what it means to be a Responsible Business.

Every member of the Inchcape team has a role in this. We must always act with honesty and integrity. We need to make the right decisions, even when they are difficult to make.

Our Code of Conduct outlines our principles for doing the right thing whichever Inchcape business you work in. The Code cannot address every situation you may encounter, so we ask you to apply the principles outlined in this Code and use your own good judgment, common sense, and knowledge of what is right when making decisions.

Please take the time to read and understand our Code of Conduct and incorporate its principles into your behaviours and decision-making.

If you have any questions, please ask your line manager in the first instance. If you see anything that appears to breach this Code or is inconsistent with our standards or policies, please let us know – either through the management chain or our confidential whistleblowing hotline.

We take all concerns raised seriously, and we will review and investigate when necessary. Inchcape will never tolerate retaliation against anyone who raises concerns.

Thank you for following our Code of Conduct.

Duncan Tait
Chief Executive Officer






CONTENTS

FINDING WHAT YOU NEED

How to navigate this interactive Code of Conduct

You can visit any section of the Code by clicking on it from within this page.

Alternatively, there are icons in the top right-hand corner of each page to help you navigate the document quickly and easily.

-  Speak Up! contact details
-  Return to cover page
-  Return to contents page
-  Previous page
-  Next page

INTRODUCTION

A message from our CEO	2
Code of Conduct	4
Our responsibilities	6
Ethical decision-making	7
Seeking guidance	8
Speak Up!	9

PRACTICES

Maintaining high standards	11	Public communications	17
Anti-bribery and corruption	12	Personal data	18
Gifts and hospitality	13	Accurate reporting and records	19
Conflicts of interest	14	Anti-money laundering	20
Competition and anti-trust	15	Protecting our assets	21
International trade laws	16	Information security	22
		Fraud prevention	23

PEOPLE

Better Together	25
Inclusion and Diversity	26
Anti-discrimination	27
Health and safety	28

PLACES

Building customer relationships	30
OEM brand partners	31
Partnering with suppliers	32
Communities we operate in	33

PLANET

Tackling climate change	35
Energy efficiency	36

CONCLUSION

A word of thanks	38
Speak up!	39

CODE OF CONDUCT

DOING THE RIGHT THING

Our Code of Conduct (“Code”) provides a guide to ethical business conduct and it has been approved by the Inchcape Board.

It sets out the standards of behaviour expected of us, helps us to make ethical decisions and shows us how we can identify potential misconduct.

Wherever we work and whatever our role, our Code will help keep us safe and protect the hard-earned reputation of our business among colleagues, customers, OEMs, suppliers, shareholders, and other stakeholders.

The aim of the Code is more than just upholding the law and our policies. It will also help to guide our conduct and decision-making so that we are always doing the right thing, working in a fair, open, and trustworthy way.

What drives us?

It is not just what we do that will help us to achieve our purpose, but the way we do it. We must act in a way that ensures that Inchcape maintains its reputation and continues to earn the trust that enables us to succeed as a company.

Our behaviours drive us to:

- Act with integrity in every decision we make. Integrity is doing the right thing even if we know that no-one is watching. Our people’s integrity is the foundation to our success – and we expect that same integrity from everyone who works with us.
- Be responsible and accountable for our decisions and actions.
- Hold ourselves to the highest ethical standards and behave in ways that earn the trust of others.
- Respect each other and work together to build strong and trusting relationships.

Conflict of laws or standards

There may be times when local laws, regulations or customs conflict with our Code. Where there is such a conflict, you must apply the strictest standard. Do not follow customs that violate our Code. Inchcape recognises that observing a local custom or practice may not be compatible with our Code. Local management’s advice should be sought in such cases to resolve the dilemma where individuals do not feel able to resolve it themselves.



CODE OF CONDUCT

DOING THE RIGHT THING

Who must follow our Code?

All Inchcape employees, temporary workers and members of the Board ("colleagues") are required to follow our Code.

Business partners, including joint ventures and third parties, can have a direct impact on our reputation through their behaviour. For this reason, we want to work with business partners that share Inchcape's commitment to ethics and compliance.

We expect and encourage all our contractors and their employees to act in a way that is consistent with our Code.

How to use the Code

Read the Code and refer to it often – whenever you need help making a difficult business decision or additional guidance. It is up to each of us to know and follow the Code, participate in all training and ask questions whenever something is unclear.

Examples of expected behaviours are included in the "Live it" sections.

You can access different parts of the Code by using our interactive contents page and navigation tools (you can also see a link to our Speak Up! line).

Supporting policies

A number of the principles in this Code are supported by more detailed policies, which are available on iConnect or via your local HR or Legal department.

Failing to comply with our Code

The consequences of not complying with this Code can be very serious. This includes damage to our reputation, significant fines and penalties, and criminal liability for individuals or the company.

Any failure to comply with this Code or its supporting policies may result in corrective action up to, and including, termination of employment or other contract.



OUR RESPONSIBILITIES

DOING THE RIGHT THING

As colleagues we must all:

- Know the policies and procedures that apply to our role.
- Follow the law, this Code and all policies.
- Be accountable for our decisions and take guidance where we need so that we each “do the right thing”.
- Speak up if we think our Code, our policies or the law have been breached in any way.
- Complete all mandatory training.
- Ask questions. Keep an open dialogue with our line managers to ensure that we make good decisions and raise concerns.
- Cooperate and be open and truthful in any investigations, audits and other reviews, including those conducted by third parties or tax authorities.

If you are a people manager, you have additional responsibilities:

- Lead with integrity. Be a positive role model and support your team.
- Ensure team members, including new joiners, understand the principles and expectations of Inchcape’s Code and the law and policies that apply to their jobs.
- Create an environment that is respectful, inclusive and open.
- Encourage your team to speak up and seek guidance where they have queries or concerns.
- Act responsibly if a team member tells you they think the Code has been breached – listen and try to understand the issue so it can be resolved. Get help where you need to and escalate matters appropriately.
- Make sure colleagues are not subjected to retaliation for speaking up.
- Seek help if you are not sure of the best approach, or decision, to take.

Acting with integrity:

“I am a valet. I found some money down the side of a customer’s car seat. I could have taken it, no-one was around, but I knew this would be wrong. Instead, I left the money on the dashboard with a note for the customer. The customer was surprised and delighted. I maintained Inchcape’s trusted reputation.”

ETHICAL DECISION-MAKING

ASKING THE RIGHT QUESTIONS

Our Code is only the start not the finishing point of what is expected of each of us. It lays out the basic rules for how we do things, but it doesn't have the answer to every question you might have or every situation you might face.

If you find yourself in a situation where you are unsure of what action to take or the "right thing" to do, you may find it helpful to ask yourself the following questions:

QUESTION:

Is it legal?

Is it consistent with our Code and policies?

Am I being truthful and honest?

Will it protect Inchcape's and our brand partners' reputations?

Would I feel comfortable if it was reported in the news or to someone I respect?

Am I treating the customer fairly?

Am I acting with integrity?

STOP

ANSWER: NO

Stop, reconsider your actions and ask for guidance

PAUSE

ANSWER: NOT SURE

Reconsider your actions and ask for guidance

GO

ANSWER: YES

The action is probably acceptable

SEEKING GUIDANCE

NEVER HESITATE TO ASK QUESTIONS

If you find that you do not know the right course of action to take, if you suspect someone else of acting contrary to this Code, or if you do not understand anything contained in this Code, please speak with one of the following:

- Your line manager in the first instance. Alternatively, you could escalate your concerns within your business if your line manager has not resolved your concerns.
- Your HR department.
- Your legal department.
- Your Compliance Department.

If you need to raise your concern in confidence, you can contact the Speak Up! line, our whistleblowing hotline. We must all show the courage to challenge actions, decisions or behaviours that we believe to be wrong.

Never hesitate to ask questions, raise concerns, or seek the guidance you need. Inchcape will not tolerate any retaliation or discrimination against anyone who raises or reports a concern in good faith.



SPEAK UP!

WHISTLEBLOWING HOTLINE

If, for any reason, you are not comfortable speaking with someone within your business you can call the Speak Up! Line or use the Speak Up! Secure website, www.inchcape.ethicspoint.com, both of which are operated by EthicsPoint, an independent company. The hotline is available 24 hours a day, 365 days a year.

Your concern will be investigated promptly and impartially. If you do not have it already, your **local free telephone number** is available at the back of the Code (it can also be accessed anytime by clicking the 📞 icon, from your HR department or on iConnect).

You can also contact the Group General Counsel directly if you wish. Or, alternatively, the Group Internal Audit function. Inchcape will take the appropriate steps to protect the confidentiality of anyone who raises a concern. Any colleague who raises a concern in good faith will be protected from retaliation in any form.



PRACTICES



MAINTAINING HIGH STANDARDS

MEETING STAKEHOLDER EXPECTATIONS

Inchcape strives to comply not just with the letter of the law (the actual words) in all of the countries in which we operate, but also the spirit of the law. Our commitment helps to build trust, protect our reputation and secure our future. Importantly, it also helps to protect the reputation of our OEM brand partners – of which we are custodians.

We understand that while you may not be an expert in the laws and regulations that apply to our business, you do need to be aware of them and what they mean for you in your role.

Doing the right thing ensures that we do not compromise ourselves or Inchcape by our actions, and that we are aware of the risks we face as a global business.

This section of the Code covers a number of important areas where we can protect ourselves and our company from wrongdoing.

If you are in any doubt as to the legality of any activity, you should seek help from your line manager or your local legal representative.



ANTI-BRIBERY AND CORRUPTION

ZERO-TOLERANCE APPROACH

Bribery and corruption, in all forms, are unacceptable and illegal. They also damage competition and markets, increase costs, and compromise the trust of our customers and brand partners.

We do not tolerate bribery or corruption in any form in our business. We follow the anti-bribery and anti-corruption laws everywhere we do business by never giving or accepting anything of value in exchange for preferential treatment or to influence an action.

We expect everyone who works with, and for, us to adopt the same zero-tolerance approach.

Live it:

- Never give, offer or promise bribes, payments, gifts or any other benefits to persuade someone to act in your favour or to obtain or retain business.
- Never seek or accept bribes, such as gifts or entertainment to give business to a new or existing supplier (this is sometimes known as a “kickback”).
- Never use an intermediary to make improper payments or bribes – we can be held responsible if they break the law.
- All transactions must be honest and transparent.
- No facilitation (or “grease”) payments: We must not make facilitation payments (directly or indirectly).

What are facilitation (or “grease”) payments?

These are usually relatively small, unofficial payments or gifts made to smooth or speed up performance of a routine action to which the payer is already entitled. For example, processing governmental paperwork, loading or unloading cargo, picking up or delivering mail or obtaining phone service, water or power supply.

Recognise a bribe

Be aware that a bribe may be something other than a payment offered to improperly influence a decision – it can take the form of a gift, a favour, a loan, a job or even an offer of entertainment or travel. A charitable or political contribution may also be considered a bribe if it is offered to influence a decision.

GIFTS AND HOSPITALITY

EXCHANGING BUSINESS COURTESIES

Appropriate meals, gifts and entertainment have long been a part of doing business.

We understand that the exchange of business courtesies can help strengthen working relationships with customers, suppliers and other business partners.

However, this should never influence – or appear to influence – our business decisions in any way.

Live it:

- Gifts given or received should be modest.
- Hospitality provided to, or received from, third parties must be modest and reasonably related to a clear business purpose.
- The giving or receiving of gifts or hospitality should remain appropriate to the business. It is almost always inappropriate at the initial stages of a relationship. It is inappropriate with any third party participating in a tender process during, just before or just after such process.

- When offering or accepting gifts or hospitality consider intent. Is the intent only to build or maintain a business relationship or offer normal courtesy, or is it to influence the recipient's objectivity in making a specific business decision?
- Colleagues must obtain the consent of their manager before giving or accepting gifts or hospitality if the value is over the locally set threshold (please refer to your local policy). If permission is granted, the action must be recorded in your Inchcape market's gifts and hospitality register.
- Gifts, favours or hospitality should never be requested.

When being offered a gift or entertainment, a good test as to whether it is acceptable is whether or not you would feel comfortable reciprocating.

For the purposes of this Code, hospitality and gifts can include travel, accommodation, meals, social or sporting events or other benefits received or given.

“Gifts and hospitality must be modest”



CONFLICTS OF INTEREST

OBJECTIVE DECISION-MAKING

We are all expected to act in Inchcape's best interests and avoid situations that create an actual or potential conflict of interest.

Conflicts of interest arise when a personal or family relationship or some kind of link with a supplier, competitor or customer interferes with our ability to make sound, objective decisions on behalf of Inchcape.

Even when no harm is intended, the appearance of conflicting interests can hurt our reputation and that of our brand partners. We should never put our own interests ahead of the business, even if it appears that the decisions may be beneficial for everyone.

In most cases, potential conflicts, once disclosed, can be appropriately managed.

Live it:

- Avoid situations where your personal interests or those of a partner, family member or close relative could conflict with the interests of Inchcape.
- Tell your line manager or HR representative immediately if you feel you may have a possible conflict of interest.
- Do not seek to use your position in Inchcape for personal benefit, or the benefit of a partner, family member or close relative.

Conflicts of interest may arise in the following situations (this is not an exhaustive list):

- Where a colleague, in addition to their work at Inchcape, undertakes work for customers, suppliers or competitors. (Please note that in most cases it is not appropriate for a colleague to work simultaneously for a customer, supplier or competitor without prior agreement from their line manager and HR representative).
- Where a colleague has a financial interest, such as direct investments, in a customer, competitor or supplier.
- Where a colleague has a partner, family member or close relative who works for Inchcape or is seeking to work for Inchcape.
- Where a colleague's partner, family member or close relative is employed by a competitor, supplier or customer.
- Where gifts or hospitality have been given which may influence our business decisions.

None of the situations described are necessarily disallowed, but they must be openly disclosed so everything can be appropriately managed.

COMPETITION AND ANTI-TRUST

ENSURING WE COMPETE FAIRLY

We must each comply with all competition and anti-trust rules in the countries in which we work and do business.

We compete vigorously in those markets, but always in a fair and open manner that complies with all local laws and regulations.

Live it:

- Do not engage in any anti-competitive behaviour, for example: any form of agreement or understanding with competitors to fix prices, rig bids, allocate customers and/or restrict supply.
- Inchcape recognises that attending trade associations and dealership councils are not in themselves problematic, and may be procompetitive. However, they can also pose risks and the normal competition rules apply – make sure you do not discuss, disclose or exchange commercially sensitive information, such as pricing information, with a competitor.

Competition and anti-trust laws are complex and often fact-specific. For this reason, if you have any questions, consult your local legal representative.

Do not disclose commercially sensitive information

"Last week I attended a dealer council meeting. Discussions started to touch on areas I felt could be anti-competitive. I decided to speak up and asked them to stop discussing the topic and to take a written note of my objections. They did not stop the discussions. I asked them to note my departure and I left the meeting.

I know I have to be accountable for my actions – at times that means having the courage to do the right thing and speak out."

INTERNATIONAL TRADE LAWS

COMPLYING WITH FAIR RULES

Inchcape abides by the trade laws of all countries in which we operate, including economic sanctions, import and export laws.

Trade sanctions, including financial sanctions, are complex. If you are involved in business dealings with a sanctioned country, entity, or person, you must ensure compliance with applicable trade laws.

If you have any questions about any aspect of trade laws, speak to your line manager who will contact your local legal representative.

"International trade laws includes appropriate rules and customs for handling trade between countries"



PUBLIC COMMUNICATIONS

PROTECTING OUR REPUTATION

Every word we speak, write or share about Inchcape has an impact on our reputation, our brand partners' reputations and our colleagues.

That's why only a few people are authorised to make official statements about our company to the public. It is essential that our public communications are clear, accurate, consistent and responsible. If wrong or incorrect information becomes public by whatever means, it can damage our reputation, our competitiveness and the trust placed in us by our customers.

Only authorised persons can talk to the media or members of the investment community; contact your local or Group Communications department for advice.

Social Media – Many of our colleagues maintain and contribute to social media sites either in their personal or professional capacity. Comments and opinions expressed on these sites can significantly impact reputations.

Live it:

- Be responsible with the content you share. Try to ensure your posts are accurate, not misleading or damaging.
- Be respectful.
- Be aware that any information which may be confidential must not be shared over social media under any circumstances.
- Use sound judgement and common sense at all times and never make remarks or post comments, images or links that are incorrect or offensive.
- Refer incoming communications or requests for information to your local or Group Communications department.



PERSONAL DATA

PROTECTING PRIVACY

Keeping personal information safe is one of the key foundations of trust. We collect, process and use data every time we make contact with our customers.

Our customers count on us to provide transparent processes, respect their privacy, honour their choices and protect their personal information.

Our fellow colleagues also expect that we will respect their personal information, and we are committed to keeping it safe and secure.

Live it:

- If you are collecting someone's information, always be clear with that person what you will do with their information. Only collect what you need for legitimate business purposes.
- Do not share customer or colleague data with other people or companies unless you have a lawful reason for doing so, such as having received their personal consent.
- Ensure that the data held is accurate and up to date.
- Make sure colleague and customer data is securely stored at all times and can only be accessed by colleagues with the necessary permission.
- Properly destroy any personal information we have that is no longer needed for business purposes.
- If you believe that any data might have been misused, lost or could be the subject of an unauthorised disclosure, you must inform your line manager immediately.

What is personal data?

It can include names, addresses and contact details, transaction data, drivers' licence information, salary information and bank details.

"I'm working on a new sales campaign. Can I contact customers who have already provided their e-mail address?"

We can only use our customers' personal data for the reason it was provided. In most cases, customers must have agreed to receive marketing communications from us at the time of providing their details in order for us to use that information for marketing purposes. We must also consider the customers' marketing preferences: if they have opted out of marketing contact from us, then we must respect their choices.

ACCURATE REPORTING AND RECORDS

MONITORING PROGRESS OF THE BUSINESS

Maintain accurate and complete information and records. All of us contribute to the process of recording financial and non-financial information. While protecting our interests, we must be open and honest about our performance – good and bad, to monitor the progress of our business.

OEMs, business partners, government officials and the public rely on our accurate and complete disclosures and business records. Such information is also essential within Inchcape, so that we can make good decisions.

Live it:

- Ensure all transactions are properly authorised, recorded and reported as soon as possible.
- Ensure that all books, records and accounts – including invoices, purchase orders, expense reports, payroll records, time records, benefit claims, warranty claims, safety and quality reports – are complete and accurate.
- Record transactions in the proper account, department and accounting period. Never put off or speed up profit or expense recording to meet budgetary goals.
- Make honest entries regarding funds, transactions and assets.
- Never knowingly make a false or misleading entry in a timesheet, report, accounting record or expense claim.

"I work in the finance team. Today I realised that I had made a mistake in one of my records. I spoke with my manager. She thanked me for alerting her and for being honest. Together we were able to rectify the mistake."

ANTI-MONEY LAUNDERING

BEING ALERT AND VIGILANT

We must be alert to the possibility that criminals may try to use our business to move funds (particularly cash) generated from criminal activity into legitimate financial systems.

Terrorist activities may be financed in the same way. If we are not vigilant, we may be unaware that these funds are moving through our system. This is commonly known as money laundering and there are severe penalties for companies and individuals involved in money laundering or other financial crimes.

***Be alert to:**

- People transferring money to us (possibly “in error”) then requesting to have the funds repaid to a different bank account. Always pay funds back into the account it came from.
- Reluctance to provide proof of identity.
- Payments to/from an unusual account.
- Payments by someone not party to the transaction (unless approved).
- Requests to make an overpayment.

Live it:

- Look out for any red flags* that might indicate money laundering, fraudulent payments, false entries, misleading statements or omissions in accounting records.
- Follow all local policies concerning cash handling to lower the risk of money laundering activity. In some countries large cash transactions are not permitted.



PROTECTING OUR ASSETS

EVERYONE IS RESPONSIBLE

Just about everything we use to do our jobs every day would be considered as company assets, and each of us is responsible for protecting these things from theft, loss, waste or abuse.

By protecting our assets, we're protecting our competitive advantage in the industry. Company assets include facilities, property and equipment, computers and IT systems, information, corporate opportunities and funds. Your time is also an asset and during working hours it should be spent acting for the benefit of Inchcape.

Live it:

- Be conscientious and act appropriately to protect our company assets from theft, loss, carelessness, waste and fraud.
- Computer equipment, phones, email and internet access are provided for business purposes and monitored regularly to help Inchcape defend against cyber-attacks and malicious activity. Limited personal use will usually be acceptable.
- Guard our intellectual property (such as trademarks and logos) and respect the intellectual property rights of others.
- If you have a security badge or keys for your premises, keep them safe.
- Make sure your user IDs and passwords are secure.



INFORMATION SECURITY

PROTECTING CRITICAL INFRASTRUCTURE

Information is woven into every aspect of our business. Protecting it is a critical responsibility for us all.

Live it:

- Treat all information with care and take precautions before disclosing it to anyone, inside or outside of our company. Only share information with those who have both a right and need to know it.
- Do not post Inchcape information in public forums or on social media.
- Be vigilant against cyber-attacks and scams and report immediately any incidents, including potential or actual losses of Inchcape information or assets.
- Always keep your passwords secret and don't share them with colleagues or others.
- Lock your screen and any tablet devices when you leave your desk.
- Keep your mobile equipment safe and take particular care in public places.
- Password-protect highly confidential documents.
- Store confidential documents and laptops in a secure place, particularly overnight – follow your local clear desk policy.
- Don't be tricked into parting with important information like passwords, PINs or bank details.
- Be aware of, and respect, any requirements about retaining or deleting information.
- Don't use personal email accounts for work matters.

"I work in the marketing team. I remind people to lock their screens if they forget. I know it can be easily done at times! They appreciate me helping them to keep their laptop and data safe."

FRAUD PREVENTION

BEING ALERT TO THE SIGNS

Each one of us has a responsibility to be alert to the signs of fraud and to report anything suspicious.

The term fraud is commonly used to describe theft through a wide variety of dishonest behaviours such as deception, forgery, lying and taking unfair advantage of someone by manipulating or misusing information.

Fraud includes tax evasion and Inchcape could be prosecuted and face unlimited fines if we or others we work with are found to have knowingly facilitated tax evasion.

Inchcape is committed to the prevention, detection and proper investigation of fraud. We expect our business partners to share this commitment. Inchcape defines fraud as any intentional act committed to secure an unfair or unlawful gain.

This includes, but is not limited to:

- Fraudulent financial reporting (such as manipulation of OEM rebates, false sales, delaying or avoiding expenses).
- Misappropriation of assets (examples include fraudulent expense claims, burglary and property damage, misuse of customer accounts or customer data).
- Theft.
- Bribery or corruption.
- Concealing a conflict of interest.
- Facilitation of tax evasion.

Live it:

- If you suspect theft or other fraudulent activity is taking place, you must speak up. Report it to your line manager, HR manager or other trusted manager or through the Speak Up! line.
- Do not attempt to investigate by yourself.
- The compliance team must be made aware of all fraud and theft incidents.



PEOPLE

BETTER TOGETHER

BUILDING AN EQUITABLE BUSINESS

**We strive to be an employer of choice.
We can achieve this by maintaining a positive, responsible,
open and welcoming working environment.**

Inchcape will treat its people fairly and impartially, without bias. We will never tolerate harassment or bullying in any form. Colleagues are expected to be open, honest, and courteous and to treat each other with respect.

Inchcape aims to provide colleagues with opportunities to enhance their skills and capabilities, helping them to develop fulfilling careers and to maximise their contribution to our business.

Inchcape is committed to honouring the terms and conditions of employment and requires all employees to do the same. We are committed to providing appropriate pay, benefits and terms and conditions of employment and to seeking agreement for changing these, where required, to meet business objectives.

For relevant policies and additional guidance please see our global policies on Inclusion & Diversity and Anti-Discrimination



INCLUSION AND DIVERSITY

DRIVING AN INCLUSIVE CULTURE

We appreciate the contribution and uniqueness of every team member in every location.

Inchcape believes a diverse workforce is a strong workforce. We value the unique contribution that each person brings to the company. We achieve more when people from diverse backgrounds, and with different talents and ideas, work together in an environment where they feel comfortable to contribute and make full use of their talents.

Our ambition is to better reflect the world's communities and ensure all colleagues have access to opportunities to develop their full potential irrespective of any dimension of diversity. Including, but not limited to, gender, age, disability, sexual orientation, religion, ethnic origin, political belief, or any other characteristic. At all our locations, we make employment decisions solely on the basis of job-related skills, achievements and performance.

Live it:

We must all:

- Demonstrate respect for our fellow colleagues, and others that we come into contact with, whether they are customers, suppliers or other parties, regardless of any social or cultural differences.
- Create an environment of openness and collaboration.
- Make the right employment decisions, such as recruiting new colleagues or offering promotions based on merit and business considerations alone.



ANTI-DISCRIMINATION

TREAT EVERYONE FAIRLY

We are committed to preventing discrimination and providing a supportive, respectful and inclusive workplace for everyone. Mutual respect at work underpins the way we do business and Inchcape does not tolerate any form of discrimination, harassment, bullying or victimisation.

This includes actions that can reasonably be considered as offensive, intimidating or discriminatory, whether towards a colleague, customer, supplier or any other third party.

Live it:

- Always treat others in the way that they would like to be treated.
- Don't engage in behaviour that would be considered by anyone in the team as creating a hostile work environment, including making inappropriate jokes or comments.
- Treat everyone fairly. Don't single out someone (or a group) based on their background, appearance or other personal characteristics.
- Make sure that your conduct at off-site events (such as team get-togethers) is as it would be at work.
- Promote a positive and open working environment where any issues can be raised easily.
- Act as role models and always display inclusive behaviour in line with One Inchcape values and behaviours.

Harassment: unsolicited and unwelcome behaviour intended to offend, disturb or upset, and it is characteristically hostile, threatening and serves to degrade or humiliate. It can be verbal, visual, physical or sexual. Harassment includes bullying, racial slurs and inappropriate jokes as well as posting or sharing statements or images that individuals may find offensive.

Discrimination: behaviour that treats someone less favourably because of a diversity characteristic. There are four main forms of discrimination: direct or indirect discrimination, association with a particular group or characteristic and perception of a particular characteristic.

"I am a 26 year old female technician. At my previous workplace I felt excluded and singled out. At Inchcape I am part of the team and feel valued and respected. We're extremely professional and also enjoy having a laugh – it's a great environment to be in. No-one feels threatened or intimidated."

HEALTH AND SAFETY

NEVER COMPROMISED

We are all responsible for making Inchcape a safe place to work.

Each of the countries in which we operate has safety laws and regulations with which we comply. As well as the personal impact that an injury can have on people's lives, it can also cause disruption for the business, for example, due to absences. Failure to deliver on our responsibilities could also damage our reputation and the trust our customers, OEMs and colleagues presently have in us.

Live it:

- Each of us has an individual responsibility to ensure that health and safety is never compromised – don't "walk by".
- Stay alert and report potential hazards to your line manager immediately, along with workplace illnesses, injuries, violent acts or threats.
- Follow and understand safety instructions and guidance and the Health and Safety policies and procedures that apply to your role.
- Participate in all training and safety programmes required for your job.
- Wear personal protective clothing and equipment whenever required.
- Ensure that all machines are operating properly.
- Take responsibility for your performance by never using drugs or alcohol in the workplace. Such abuses are illegal, dangerous to yourself and others, and pose safety risks that will not be tolerated.
- Keep violence out of our workplace, on-site activities and Inchcape-sponsored events. Violence might include physical assault, violent images or messages, threats, intimidation or property damage. Weapons are prohibited on Inchcape premises.



PLACES

BUILDING CUSTOMER RELATIONSHIPS

DELIVERING GREAT EXPERIENCES

Our customers place a great deal of trust in us, whether that's buying their next car from us or coming into our dealerships to have their existing one serviced or repaired.

To be successful, we must preserve that trust by continually engaging customers, responding to their needs and making sure we lead on customer experience. That includes understanding their requirements, concerns and challenges and never taking customer relationships for granted.

It also means communicating honestly and responsibly with the public. When customers, and potential customers, provide us with personal information, we must protect the privacy of that information in accordance with our Code and data protection policies.

You play an important role in helping us build lasting relationships with our customers and maintaining positive public relations. By doing business with integrity and protecting our customers' interests, we are demonstrating our commitment to them. It shows that we are doing more than just operating a business – we are good partners and ethical members of the communities we serve.

Live it:

- Treat our customers fairly and always put their interests first.
- Be accurate and complete in all communications with customers.
- Respond quickly and thoughtfully to customer concerns.
- Never mislead customers by omitting important information or over-promising something that we cannot deliver.
- Always act with integrity and honesty.
- Respect and protect our customers' privacy.
- Handle customer information with care, never sharing personal, business or financial information. Keep it confidential and in accordance with our data protection policy.
- Ensure that our customers receive quality products by holding suppliers and other partners accountable for the quality and safety of the products and services they provide.

OEM BRAND PARTNERS

PROVIDING EFFICIENT ROUTE TO MARKET

We represent our OEM brand partners in all the markets we operate. We are the custodians of each OEM's reputation and must seek to protect it.

We want to be the OEM partner of choice. We all know that this requires a deep understanding of our brand partners and their products to best represent that brand and deliver sustainable growth over the long term. Delivering sustainable growth means we all take steps to lead on customer experience, which will in turn ensure we maintain the trust our OEM partners place in us.

"I am a sales consultant. Last week I met with our OEM representative. She told me that she would like our dealership to promote some new accessories. I shared this wish with my dealership colleagues and we came up with some ideas. We are now working with the OEM to implement the best ones."

Live it:

- Always seek to strengthen our relationships with brand partners by investing time to understand their wants and needs, while continuously seeking new opportunities for collaboration.
- Understand and show passion for the products or services we offer on behalf of our brand partners.



PARTNERING WITH SUPPLIERS

FOSTERING STRONG RELATIONSHIPS

We recognise that ethical and productive partnerships with our suppliers strengthen our business, our reputation and that of our OEM brand partners.

We treat our suppliers fairly and with respect, and we expect them to uphold our high standards.

Live it:

- Choose suppliers carefully and engage with the procurement team. When selecting a supplier, be sure to work within the guidelines or policies that have been established by your business and always base your decisions on objective criteria such as value received, quality, price and service.
- Periodically re-assess your existing suppliers against those same criteria to ensure that standards are being maintained.
- Make sure suppliers understand what we expect by knowing and agreeing to uphold our high compliance and ethics standards.
- Never accept inappropriate gifts, entertainment, rebates, kickbacks or anything that could interfere – or could be seen by others to interfere – with your objective decision making.



COMMUNITIES WE OPERATE IN

MAKING A POSITIVE CONTRIBUTION

Inchcape operates as an international business, in many diverse cultures. We believe in supporting the different cultures and communities in which we operate, often through sponsorship and support for local charities or local people.

All our colleagues can be involved in such initiatives and can expect to be supported by Inchcape in their efforts to help local communities.

Live it:

- Consider the effect of any project or campaign on the local community.
- Don't give or commit charitable support to any unregistered or informal charities or not-for profit organisations (unless proper due diligence has been conducted).



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 road and a red car on the right side. The word "PLANET" is superimposed in large, bold, white capital letters across the center of the image, partially covering the road and the surrounding trees. The overall image has a sense of motion, with some blurred green lines radiating from the center, suggesting a fast-paced or dynamic environment.

TACKLING CLIMATE CHANGE

BUILDING A SUSTAINABLE FUTURE

The Paris Agreement set targets to limit global warming to below 2°C, preferably 1.5°C. It was a gamechanger because for the first time, nations were united in a common cause to combat climate change.

Urgent action is now needed to keep the 1.5°C target in sight, including:

- Transitioning to renewable sources of energy
- Becoming ever more efficient with our use of natural resources
- Accelerating the switch to new energy vehicles

As a company we need to be aware of the impact our industry has upon the environment, and the likely impact of climate change upon our business. As we take action to combat the most serious effects of climate change, we will encounter new risks and opportunities as we transition to a low carbon future.

Practical ways we can safeguard the environment in our day-to-day operations include:

- Reducing our carbon emissions
- Recycling and reusing to reduce waste
- Selecting suppliers and products to reduce emissions in our value chain

Our responsibilities:

- Understand the emissions associated with our business and how we can reduce them
- For new projects, make sure that you check the environmental impact at the start and make adjustments to reduce any issues
- Aim for continuous improvement - we can always rethink how we do things - and ask whether what we are doing is best for the environment

If you're unsure about any of our policies, or have any questions or ideas for improving our environmental performance, talk to your line manager – all ideas are welcome.



ENERGY EFFICIENCY

REDUCING THE IMPACT OF OUR BUSINESS

Effective energy management is beneficial to all of us. As well as delivering environmental benefits and cost savings, it helps create a healthier and more productive workplace. We can all do little things at work to make a collective difference.

Heating

- Check current thermostat settings and match operating hours to opening times
- Report areas that are too hot or cold - by doing this, we avoid unnecessary use of heating and cooling systems
- Keep heat sources and cooling systems (fans, radiators etc.) free of obstructions and dust

Lighting

- Don't rely excessively on artificial lighting - make use of daylight by lifting the blinds
- Switch off lights at night or when a room is unoccupied, and appoint someone to make sure that this happens (or request that movement sensors are fitted)
- Dispel the myth that turning on fluorescent lights uses more energy than leaving them on - it doesn't, so switch them off!
- Adjust window coverings to minimise glare but maximise light
- Keep light bulbs clean and dust-free (light levels can drop by 30% over two to three years if you don't)

Air-conditioning and ventilation

- Turn AC systems off at night and dispel the myth that it is cheaper to leave them on than starting them up again in the morning
- Use natural ventilation wherever possible - if possible, open the window instead, but not when the AC is on!



ENERGY EFFICIENCY

REDUCING THE IMPACT OF OUR BUSINESS

Equipment

- Turn off equipment when it's not being used as this can lower cooling costs
- Reduce screen brightness to slash energy use and set monitors to sleep mode after 10 minutes
- Don't leave appliances on standby - turn them off, especially at night
- Maintain equipment regularly (e.g. by cleaning filters and fans)
- Position printers, photocopiers and other heat-generating equipment in ventilated areas to reduce cooling costs

Carbon emissions

- Be an eco-friendly driver - accelerate more slowly, stick to speed limits, maintain a constant speed, anticipate stops etc.
- Review your commute: consider car-sharing or switching to electric; use public transport or bicycles if possible
- Avoid unnecessary business travel - switch to virtual meetings where possible to save on both time and emissions

Water

- Report leaky pipes or dripping taps
- Turn off taps and don't leave them running needlessly

Waste

- Set up printers to print on both sides of the paper
- Use colour and high-quality printing only when it is necessary
- Shred unwanted paper and reuse it as packaging
- Recycle where possible

These are just some of the ways in which you can make a difference. Be sure to look out for other ideas to help us reduce our energy use, find greener options and offset our carbon footprint.



A WORD OF THANKS

We appreciate you taking the time to read the Inchcape Code of Conduct and taking its guidance to heart. You are the one who must demonstrate our performance drivers, act with integrity and respect in your daily work, and be accountable for your actions.

Each one of us is responsible for how we deliver our strategy and work to achieve our purpose of bringing mobility to the world's communities – for today, for tomorrow and for the better.

Think of the Code as a living, working guide. Refer to it often and it will help you to do the right thing, first time, every time.

If you have any questions about the information in our Code, or if you need additional guidance, please speak with your line manager, HR representative, HR shared services or your local legal or compliance representative.



SPEAK UP!

If, for any reason, you are not comfortable speaking with someone within your business you can use the QR code or the Speak Up! Secure website, both of which are operated by EthicsPoint, an independent company. The hotline is available 24 hours a day, 365 days a year.

www.inchcape.ethicspoint.com

