



Responsible Procurement Policy

High Integrity. High Performance.



Contents

Introduction	4
Purpose & Scope	5
Management System Requirements	6
Due Diligence	7
Non-Compliance	7
Pillar 1: Business Ethics & Standards	8
Compliance with Laws	9
Anti-bribery, Corruption & Fraud	9
Conflicts of Interest	9
Accurate Records, Anti-Money Laundering & Economic Sanctions Compliance	9
Trade Sanctions & Export Controls	10
Confidentiality & Intellectual Property Rights	10
Anti-Competitive Behaviour	10
Data Privacy	10
Information Security	10
Responsible Sourcing of Raw Materials & Minerals	10
Conflict Minerals	11
Deforestation	11
Indigenous People	11
Animal Welfare	11

Pillar 2: Societal & Human Rights	12
Forced Labour & Modern Slavery	13
Children's Rights	13
Working Hours & Leave	13
Wages & Benefits	13
Non-Discrimination & Fair Treatment	14
Freedom of Association & Collective Bargaining	14
Health & Safety	14
Pillar 3: Environment	15
Greenhouse Gas Emissions	16
Energy Consumption	16
Waste	16
Water	16
Biodiversity	16
Further Information	17
Supplier Acknowledgment	17

Introduction

The Aston Martin Lagonda Group (Aston Martin) has a deep commitment to be a responsible business, conducting business honestly and fairly, with a passion to be a positive force in society, supporting the local communities around our operations and investing for the future.



Aston Martin suppliers are fundamental to the success of the business and play an integral part in achieving the vision to be the world's most desirable, ultra-luxury British performance brand, creating the most exquisitely addictive performance cars.

Aston Martin knows that customers, shareholders, employees and other stakeholders increasingly expect companies to take a responsible approach when it comes to managing impacts on the environment and they expect companies to play a positive role in society. As an international business selling vehicles around the world, **Aston Martin must meet differing legal standards and requirements, such as source materials, source countries or regions, environmental standards and**

compliance. Aston Martin relies on suppliers to support them in this. Aston Martin aims to be a world-leading sustainable ultra-luxury automotive business.

Aston Martin strives for the highest standards in all areas of the business and have a requirement for its suppliers to meet the highest standards of a responsible and sustainable business.

Aston Martin has set out a clear strategy within its **Racing. Green. initiative**, which details priorities for its sustainability ambitions. It defines the aims and goals, realising these goals will depend on Aston Martin and its suppliers working together.

Purpose & Scope

The purpose of the Responsible Procurement Policy is to define Aston Martin's requirements for all suppliers and sub-suppliers within the entire supply chain.

These requirements are organised into three pillars:



1. Business Ethics & Standards



2. Societal & Human Rights



3. Environment

Aston Martin recognises that these three pillars are increasingly interconnected and interdependent. Suppliers may therefore need to consider them holistically to meet the requirements. Aston Martin expects suppliers to comply with the spirit of the principles, underpinning the requirements in addition to the wording of this policy.

The requirements align with and support the goals of Aston Martin's sustainability strategy *Racing.Green*.¹ including the **Aston Martin Code of Conduct** and further Policies².

Aston Martin's approach is informed by international frameworks, including the 10 Principles of the United Nations (UN) Global Compact³, the UN Guiding Principles on Business and Human Rights⁴, the OECD Guidelines for Multi National Enterprises⁵, OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas⁶ and the Conventions of the International Labour Organization (ILO), in particular its fundamental rights at work⁷.

Who must comply with this policy?

- All of Aston Martin's suppliers who provide goods and/or services directly to Aston Martin.
- Any other supplier who has a contract with Aston Martin, or whom Aston Martin has expressly appointed to provide goods and/or services to another Aston Martin supplier, even where they do not directly supply or invoice Aston Martin.

Who in the Supplier's business does this policy apply to?

Everyone in the Supplier's company, including:

- All company employees and workers, and;
- all parts of its company, covering all business units, divisions and operations.

Aston Martin seeks to work with those who commit to achieving the requirements of the Responsible Procurement Policy within its own business and across its value chains.



¹ <https://www.astonmartin.com/en-gb/our-world/racing-green>

² <https://www.astonmartinlagonda.com/sustainability>

³ <https://unglobalcompact.org/what-is-gc/mission/principles>

⁴ https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf

⁵ <https://www.oecd.org/corporate/mne/>

⁶ <https://www.oecd.org/corporate/mne/mining.htm>

⁷ https://www.ilo.org/declaration/thedeclaration/textdeclaration/WCMS_716594/lang--en/index.htm

Management System Requirements:

- Suppliers must comply with all the requirements of this policy.
- Suppliers are responsible for cascading and ensuring compliance of all the requirements of this policy within its own operations and supplier base. This includes:
 - contractors or service companies employed by a supplier's company to enable the running of its company (for example, contracted workers in areas such as manufacturing, IT, security, catering, cleaning and other services); and
 - **sub-contractors, including:**

sub-contractors of services doing the actual work that Aston Martin is being invoiced for, including self-employed workers and those on temporary or flexible contract terms; and

sub-contractors of raw materials or goods that Aston Martin is sourcing, including through traders, brokers and/or agents.
- Suppliers shall nominate a senior executive within its business to be responsible for compliance with the areas covered by this policy.
- Suppliers shall be proactive in seeking to identify and eradicate any non-compliances of the requirements of this policy in its own operations or in its supply chains.
- Suppliers shall implement appropriate grievance channels and reporting mechanisms for all employees and contractors to raise concerns or complaints, as well as recommendations for improvement areas concerning its operations, without fear of retaliation.
- Suppliers shall promptly inform Aston Martin of any material breaches of this policy or its underlying principles.

Raising Concerns

This policy sets out the standards Aston Martin expects from its suppliers. If Aston Martin falls short of these standards, or if a supplier experiences or observes any misconduct at work, in relation to Aston Martin (illegal, unsafe or any other issues), please raise a concern.

Suppliers can report any concerns either through the appropriate channels within its own organisation or directly to Aston Martin. This can be raised through either an existing contact at Aston Martin or via the confidential reporting **SpeakUp system**, which is run by an independent third party through the following channel: www.astonmartin.ethicspoint.com.

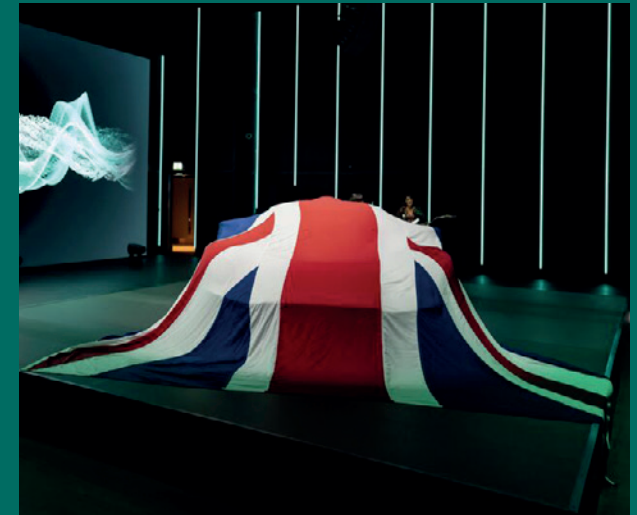
Due Diligence

Aston Martin conducts supply chain due diligence to identify, address and manage legal and ethical commitments, particularly in relation to compliance standards, human rights, environmental standards and the principles of the OECD Due Diligence Guidance for Responsible Business Conduct⁸.

Aston Martin reserves the right to carry out periodic audits across its supply chain to assess compliance with this policy. Suppliers are required to cooperate with such periodic audits as Aston Martin deems necessary, including providing access to information which Aston Martin may require from time to time.

Suppliers are required to carry out its own due diligence in the areas covered by this policy, within its own operations and supply chain, in accordance with legal obligations and comply with principles of the OECD Due Diligence Guidance for Responsible Business Conduct. Suppliers should **identify, prevent, mitigate and account for how they address and manage potential and actual adverse impacts on human rights and the environment** directly linked to their operations, products or services by their business relationships, as well as those they may cause or contribute to through their own activities.

⁸ <https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm>



Non-Compliance

Confirmation of adherence to the Responsible Procurement Policy is a prerequisite for working with Aston Martin. **When selecting suppliers, Aston Martin uses sustainability performance criteria to inform its decision making.**

Suppliers must complete a self-assessment questionnaire and provide such additional information as is requested before starting work with Aston Martin.

Aston Martin reserves the right to carry out further due diligence actions, including on site audits, and requests for such information as is required for Aston Martin to be compliant with the laws and regulations that impact Aston Martin and its *Racing.Green.* commitments. Suppliers must respond to requests for information in a timely manner.

Aston Martin suppliers are required to comply with this policy. Companies who fail to meet the requirements set out in this policy on an on-going basis will not be permitted to work for, or continue to work with, Aston Martin.

As part of the supplier selection process, Aston Martin gives preferential weighting to those companies who can demonstrate a strong commitment to sustainability performance. Aston Martin may allow a short transition period for new suppliers who do not fully meet the entirety of Aston Martin's policy standards, at its discretion, and in specific situations where demand for a particular good and/or service is urgent, but any supplier selected by Aston Martin which does not meet the Responsible Procurement Policy requirements must agree an action plan to close any gaps in its processes and standards.

Any questions regarding the interpretation of this policy should be sent to the Procurement Business Office, at rpp@astonmartin.com.



Pillar 1: Business Ethics & Standards

Aston Martin takes pride in conducting business in an **ethical, honest and transparent** manner at all times, throughout its entire organisation and is committed to delivering the highest standards.

It's important to Aston Martin to act with integrity whilst complying with the law. Aston Martin expects all its suppliers to conduct its business with integrity, especially in the following areas:



Compliance with Laws

Suppliers are required to **comply with all applicable laws and regulations as a minimum requirement** in the provision of goods and/or services. Environmental and other operating permits (where required) must be held, for the countries where the supplier operates, as well as for all other applicable international laws and regulations.

Aston Martin recognises that, in some countries, laws and regulations may be less ambitious than the requirements set out in this policy. Aston Martin expects all suppliers to adopt the approach and standards in this policy as a minimum, even if not legally required in a specific country.

Anti-Bribery, Corruption & Fraud

Aston Martin takes a **zero-tolerance approach to bribery, fraud and other forms of corruption**. Aston Martin is committed to acting professionally, fairly and with integrity in all business dealings and relationships, implementing and enforcing effective systems to counter corruption in all its forms.

Suppliers must not tolerate, permit or engage in bribery, corruption or other unlawful practices. This includes prohibiting all forms of bribery and not permitting any person to promise, offer or give any benefit or advantage of any nature to any person for the purpose of influencing

decisions of any kind (including governmental, administrative or judicial) or obtaining undue advantage, or offering or accepting gifts, entertainment or other incentives that may reward or influence a business decision.

Suppliers must have a policy in place setting out the steps they take to address the risks of bribery and corruption.

All suppliers should comply with the principles of the Aston Martin Anti-Bribery, Corruption and Fraud Policy.

Conflicts of Interest

Suppliers are required to do business in a transparent way, avoiding actual or perceived conflicts of interest that could interfere with objective and professional decision making. **Suppliers must therefore disclose any potential conflict of interest**, including a situation where an Aston Martin Director, employee or contractor may have a personal interest of any kind (including close family relationships) in the supplier's business or any kind of economic ties with the supplier.

If a supplier has any concerns about a potential conflict of interest, they should consult Aston Martin at the earliest possible point in time.



Accurate Records, Insider Trading, Anti-Money Laundering & Tax Compliance

Suppliers must **perform all Aston Martin dealings transparently and record them accurately and in a timely manner**. Confidential information in the supplier's possession, regarding Aston Martin or any other company in the Aston Martin group, must not be used to either engage in or support insider trading or other potentially illegal practices.

Suppliers are required to comply with all relevant anti-money laundering and anti-tax evasion legislation and rules. Where in doubt, suppliers should seek professional legal advice to ensure that they are compliant.

Trade Sanctions & Export Controls

Aston Martin is committed to **compliance with all applicable trade, economic and trade sanctions and export control**. Aston Martin requires suppliers to have measures in place to ensure that no goods and/or services are supplied to Aston Martin in breach of such laws and to provide documentary evidence upon request.

Confidentiality & Intellectual Property Rights

Suppliers are required to **respect Aston Martin's confidential information and intellectual property rights (IP)** by safeguarding such information and IP against misuse, mishandling, counterfeiting, theft, fraud or improper disclosure in accordance with applicable law and contractual terms. When suppliers are entrusted with such information or IP, it must only be shared internally on a needs-to-know basis. Failure to protect such information and IP will result in the termination of a contract between Aston Martin and the supplier. Suppliers must immediately inform Aston Martin upon becoming aware of any unauthorised disclosure of Aston Martin's information or misuse of Aston Martin IP.

Anti-Competitive Behaviour

Suppliers are required to **comply with all applicable competition and anti-trust laws**. In particular, but not exclusively, suppliers must not (i) fix or control prices, either by agreeing directly with a competitor, or any other method, such as through third-parties; (ii) structure or orchestrate bids to direct a contract to a certain competitor or reseller (bid rigging); (iii) boycott suppliers or customers; (iv) divide or allocate markets or customers; (v) limit the production or sale of products or product lines; or (vi) engage in any other illegal restrictive practice.

Data Privacy

When suppliers are entrusted with any personal data, they are required to **safeguard it and take appropriate steps to protect it from misuse**. Suppliers who are processing personal data on behalf of Aston Martin may be required to agree to additional data privacy terms, and to commit to privacy principles reflecting its commitment to protect the personal data entrusted to it, in accordance with applicable personal data protection legislation (international and local) and Aston Martin's instructions. Any personal data breach related to Aston Martin data or impacting supply to Aston Martin must be reported immediately to the Aston Martin Data Privacy Officer at data.officer@astonmartin.com.

Information Security

Suppliers are required to understand and comply with all relevant legal, regulatory and contractual requirements relating to Cyber Security, Information Security, Data Protection and Information Processing. Suppliers must **safeguard all Aston Martin electronic information and take appropriate steps to protect its confidentiality and integrity**.

Aston Martin expect suppliers to implement best practices for all aspects of cybersecurity, including **ISO/IEC 27000** or relevant security best practice, including defined incident response processes, to help ensure Aston Martin information is properly protected, managed, and resilient against potential cyber-attacks.

Responsible Sourcing of Raw Materials

Aston Martin is committed to **responsible and ethical sourcing across its supply chain**, and is dedicated to implementing sustainable, long term sourcing strategies. As part of its sourcing process, Aston Martin are dedicated to ensuring that any materials sourced by Aston Martin, or its suppliers, are sourced in a responsible manner and in a way that is compliant with the governing legislative standards of the country of operation, and in countries where Aston Martin goods are used. Suppliers are therefore required to conduct responsible supply chain management of any materials.

Conflict Minerals

Regarding smelters or refineries of tin, tungsten, tantalum and gold, suppliers may only use raw materials from smelters or refineries that meet the requirements of the OECD Due Diligence Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas⁹. Suppliers are required to submit a valid CMRT (Conflict Mineral Reporting Template) and/or CRT (Cobalt Reporting Template) report when requested by Aston Martin.

Aston Martin encourages relevant suppliers to consider becoming members of the Initiative for Responsible Mining Assurance (IRMA) or Responsible Mineral Initiative (RMI).

Deforestation

Suppliers **must not directly or indirectly procure materials that contribute to illegal deforestation**, and all timber products supplied to Aston Martin must be either FSC¹⁰ or PEFC¹¹ certified, sourced from plantation or recycled timber, or licensed under the FLEGT system.¹² Suppliers must be able to produce appropriate certification when requested by Aston Martin.

Indigenous People

Suppliers are required to **respect, promote and protect the rights of indigenous peoples and local communities** throughout the supply chain, in accordance with the UN Declaration on the Rights of Indigenous Peoples¹³. This includes not engaging in land-grabbing and to obtain Free Prior and Informed Consent (FPIC), as defined by the UN-REDD Programme¹⁴.



Animal Welfare

Aston Martin recognises the following ethical principles and expects suppliers to implement standards and best practices to comply with the principles of the following:

- The Five Freedoms of the British Animal Welfare Committee (AWC) to evaluate animal welfare (freedom from hunger, thirst, and malnutrition, freedom from discomfort, freedom from pain, injury, and disease, freedom from fear and distress, and the freedom to express normal behaviour).
- The standards for the improvement of animal health and welfare (Terrestrial Animal Health Code) of the World Organisation for Animal Health (OIE).
- The 3R principles for animal testing (Reduction, Refinement, Replacement). The goal of the 3R principle is to completely avoid animal testing altogether (Replacement) and to limit the number of animals (Reduction) and its suffering (Refinement) in tests to the minimum necessary.

If requested, suppliers must provide evidence of compliance with applicable regulatory animal welfare standards.

⁹ <https://www.oecd.org/daf/inv/mne/mining.htm>

¹⁰ <https://uk.fsc.org/what-is-fsc>

¹¹ <https://www.pefc.org/>

¹² <https://flegtvpafacility.org/flegt/>

¹³ https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf

¹⁴ <https://www.un-redd.org/>



Pillar 2: Societal & Human Rights

Aston Martin is committed to **respecting internationally recognised human rights**, in line with the UN Guiding Principles on Business and Human Rights, which Aston Martin are embedding throughout its business, as stated in Aston Martin's Declaration on Social Rights.

Aston Martin base its human rights commitments on the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.¹⁵

Aston Martin requires suppliers to comply with the same Fundamental Rights at Work principles of the International Labour Organization, and to respect all internationally recognized human rights and treat all people with dignity.

¹⁵ <https://www.ilo.org/declaration/lang--en/index.htm>



Forced Labour & Modern Slavery

Forced or compelled labour falls under the category of modern slavery. Aston Martin takes a **zero-tolerance approach** to such activities within its supply chain. Consequently, Aston Martin requires suppliers to reject any form of slavery or human trafficking, including not engaging in or tolerating abusive working conditions, or coercion of workers using violence, intimidation, retention of identity documents and/or passports, withholding of wages, recruitment fees, restriction of movement, debt bondage or any other form of exploitation. As part of their due diligence requirement, Aston Martin requires suppliers to monitor its supply chain regularly to identify and mitigate any potential risks. Suppliers may be required to provide declarations as to the origin of its raw materials and components, to satisfy Aston Martin that no forced labour or exploitation of rights has occurred.

Children's Rights (including prevention of child labour)

Aston Martin operates in accordance with child employment laws and has a **zero-tolerance stance on child labour. Suppliers are required to prevent all forms of child labour** and respect children's right to natural development and education. No supplier should employ any children under the age of 16.

Working Hours & Leave

Suppliers are required to **respect and comply with applicable laws** regarding working and resting hours, including employees not being required to work more than the regular and overtime hours, and employees being entitled to reasonable meal and rest breaks. Suppliers are also required to comply with all other applicable leave regulations including annual, sick and parental leave. Overtime by suppliers' employees should be carried out on a voluntary basis.



Wages & Benefits

Suppliers are required to provide employees with a total compensation package for a standard working week that includes wages, overtime pay, benefits and paid leave which, at a minimum, complies with applicable laws and collective bargaining agreements. Information about employment terms and conditions should be provided to employees in a format and language they can easily understand, such as a written employment contract and a timely wage statement.

Other than legally mandated deductions, all other deductions from wages should be made only with the express and written consent of the employees in a language they understand.

Non-Discrimination & Fair Treatment

Suppliers are required to **treat all its employees equally, providing equal employment opportunities, and with respect and dignity**. Discrimination based on race, ethnicity, age, role, sex, gender identity, colour, religion, country of origin, sexual orientation, marital status, pregnancy, dependants, disability, social class, union membership, personal characteristics, disease, health status or political views, or on any other grounds stated by local law should be prevented. All suppliers should comply with appropriate anti-discrimination legislation.



Freedom of Association & Collective Bargaining

Suppliers' employees must be able to **freely exercise its right to lawfully form, join or not join a labour union of its choice** and collectively bargain and do so without fear of intimidation, harassment or obtaining prior approvals, unless legally required. Employees shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, intimidation or retaliation. Where local law sets restrictions on the right to freedom of association and collective bargaining, suppliers are expected to allow alternative forms of worker representation, association and bargaining..

Health & Safety

Suppliers must comply with all relevant **national and international health and safety standards and regulations**.

Suppliers should operate an effective and certified health and safety management system such as **ISO 45001**, OHSAS 18001 or similar, to enable the continuous reduction of work-related health and safety risks and improve working conditions for its employees and sub-contractors.

If no certified health and safety management system is in place, suppliers should at a minimum adopt the following general steps to ensure health and safety for its employees:

- identify and assess health and safety risks through emergency preparedness procedures;
- implement emergency plans, fire safety and response procedures including employee notification and evacuation procedures, training and drills;
- make safety information available to relevant staff to educate, train and protect employees from safety risks; and
- monitor and control work-related health and safety risks (e.g. chemical, biological, physical and physiological dangers) as well as the corresponding protective measures.

Aston Martin may conduct audits and other such reviews from suppliers in respect of safety, societal and human rights standards within Aston Martin's supply chain.



Pillar 3: Environment

Environmental sustainability is a **core component of Aston Martin's wider business strategy**.

Aston Martin are committed to operating as a responsible business including the protection of the environment and to ensuring it meets environmental compliance obligations. This includes managing Aston Martin's operations, sourcing, manufacturing and distribution of its products in ways that protect and enhance the natural environment.

Suppliers are required to operate an effective and certified environmental management system, in accordance with **ISO 14001:2015**, to continuously minimise its resource consumption (energy, water, raw materials, primary materials) and environmental impact (emissions, pollutants, waste). In circumstances where a supplier does not hold ISO 14001, a roadmap to achieving this needs to be developed with a firm commitment from the supplier to deliver against these performance standards.

This section will address **environmental sustainability requirements** Aston Martin requires from its suppliers, focused on climate, water, waste and biodiversity.



Greenhouse Gas Emissions

Suppliers are required to comply with all applicable legal requirements and to hold permits with respect to Greenhouse Gas (GHG) emissions management and reduction.

Suppliers are required to have an environmental management system related to GHG emissions reduction in place to identify, measure and mitigate GHG emissions.

Aston Martin suppliers fall within the Scope 3 classification of GHG emissions and therefore should understand that its emissions form part of Aston Martin's Scope 3 emissions, and consequently part of Aston Martin's *Racing.Green* strategy, to actively reduce supply chain emissions. Aston Martin welcomes and encourages all suppliers to take urgent and large-scale action to reduce its GHG emissions. Aston Martin includes progress on reducing GHG emissions as a key evaluation criteria for selection of suppliers.

When requested, suppliers must provide sustainability footprint data for product level GHG emissions for the materials sold to Aston Martin, and any other such data from its sub-suppliers, logistics and other activities, so that Aston Martin can measure and improve the environmental performance of its products.

Energy Consumption

As part of the implementation of ISO14001:2015, suppliers are required to take appropriate measures to ensure the efficient use of energy through monitoring and reducing energy consumption, and to advance the use of renewable and alternative energy sources for its operations and logistics.

Waste

Suppliers are required to comply with all applicable laws and permits relating to the storage, handling and disposal of waste directly or through waste sub-contractors. Waste (including residual waste and hazardous waste) must be stored, handled, transported and disposed of in a way that protects the health and safety of people and also protects the environment.

As part of the implementation of ISO14001:2015, suppliers are required to take appropriate and adequate measures aimed at avoiding waste, instead re-using resources and recycling.

Water

Suppliers are required to comply with all applicable laws and permits relating to water, including but not limited to, water abstraction, water usage, surface water management and effluent discharge.

As part of the implementation of ISO14001:2015, suppliers are required to take appropriate and adequate measures aimed at ensuring efficient use of water.

Biodiversity

Suppliers are required to hold and comply with current and valid legal permits and regulatory requirements relating to planning, development and business operations, with respect to the protection of the environment, nature and biodiversity.

Supplier Acknowledgment

Suppliers are required to communicate the principles of this document to its own suppliers and obligate them to observe the same principles and comply with the relevant laws and standards within these areas.

By signing below, the supplier hereby agrees to comply with these standards and operate in a manner that is aligned with the requirements detailed within this policy.

Signature:

Company:

Name:

Position:

Date:

Further Information

For any further information or queries on the contents of the Responsible Procurement Policy, please contact the Aston Martin Procurement Business Office Team at rpp@astonmartin.com.





Aston Martin Lagonda plc
Banbury Road,
Gaydon,
Warwickshire,
CV35 0DB

2024 Version 2.0