

Our Code of Conduct

High Integrity. High Performance.

November 2026


NO ONE BUILDS AN ASTON MARTIN ON THEIR OWN

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Executive Committee



Lawrence Stroll
Executive Chairman



Adrian Hallmark
Chief Executive Officer



Doug Lafferty
Chief Financial Officer



Ian Hoban
Chief Technology Officer



Michael Marecki
General Counsel



Vincenzo Regazzoni
Chief Industrial Officer



Marek Reichman
Chief Creative Officer



Andrea Baldi
Chief Commercial Officer

Message from the Executive Committee

Dear Colleagues,

At Aston Martin, our purpose is to create vehicles with the ultimate technology, precision and craftmanship that deliver a thrilling performance and a bespoke, class-leading experience. Our commitment to integrity lies at the heart of this and forms a key part of our identity.

This integrity is not only built on our expert and bespoke mastery but reflects our core values: unity, openness, trust, ownership and courage, all of which act as guiding principles for what we do and who we are. It is how we achieve our vision to be the world's most desirable ultra-luxury British brand, creating the most exquisitely addictive cars. Conducting all business in an honest and ethical manner is also essential to maintaining the trust of our customers and other stakeholders.

This Code of Conduct should be thought of as what inspires and influences us, showing us how to embody these values in our everyday work and driving us to do what is right for the benefit of our Company and team. The Code signposts you to our relevant policies and procedures in each area. It sets out the key behaviours and principles that we must all follow together, because no one builds an Aston Martin on their own.

Our commitment to this Code of Conduct is not just a statement, but an expectation that we will all uphold these principles and lead by example.

We therefore ask you to take the time to read and familiarise yourself with our Code, as, by following its principles, we will create a culture of high integrity that matches our drive for high performance.

The Executive Committee

Our values

Our values are the driving force of what we do and who we are, pushing us to reach new possibilities and achieve our goals. We are the proud makers of the most exquisitely addictive and ultra-luxury performance sports cars - showcasing iconic and bespoke British mastery.

And we do this with…



Unity

Stronger together

The excitement of meeting the challenge. The exhilaration of meeting it as a team. We achieve our goals through collaboration and connection.



Openness

Listen, and you will see

Every voice is heard. Diverse perspectives understood. A willingness to be open with each other is our source of strength.



Trust

Believe in the team

Fundamental respect. Recognition and celebration. We put faith in each other's unique insight and expertise.



Ownership

Take responsibility

Performance, dedication and passion come from within. We set the standard and hold each other accountable.



Courage

Towards greater things

To be at the forefront of innovation requires positivity, bravery, and a dedication to personal growth and excellence.

United Nations Global Compact

In line with our values, we are also a signatory of the UN Global Compact. This means we are committed to upholding its 10 principles on human rights, the environment and anti-corruption.

Our purpose

Our purpose is to create vehicles with the ultimate technology, precision and craftmanship that deliver thrilling performance and a bespoke, class-leading experience.

Our vision

Our vision is to be the world's most desirable, ultra-luxury British performance brand, creating the most exquisitely addictive performance cars.

Our Code of Conduct at Aston Martin



Why do we have a Code?

At Aston Martin, we expect everyone to comply with the law, act with integrity and do what is right. Our Code of Conduct ("Code") reflects our values in action, particularly in areas with key ethical or legal considerations, marking what we stand for, what we expect from you, and what you should expect from your colleagues. Outlining the key policies and behaviours that everyone should follow, our Code guides the way that we, both as a business and individuals, operate. It's what our customers would expect of us, and what we expect of ourselves. Without high integrity, there is no high performance; this Code is how we achieve both.

Who does the Code apply to?

Our Code applies to everyone working for and with Aston Martin, including our Board, employees, temporary colleagues and contractors. We expect third parties working with the Company, such as joint venture partners and suppliers, to respect the standards and behaviours outlined in the Code.

How should I use the Code?

Our Code should be used as a guide and resource for legal and ethical behaviour in the workplace, helping us to live our values in practice. It is essential that we all follow the policies referred to in this Code as well as the Code's principles and fulfil our legal obligations. Familiarise yourself with the Code, specifically focusing on the policies and procedures that are relevant to your work and use them on a day-to-day basis. If you feel a working practice is not lawful, ethical, or safe, or if it breaches this Code or the underlying policies, it is crucial that you speak up. Remember, when in doubt, always ask for advice.

We all have a responsibility to follow the Code and each of us will be held accountable for our conduct. Failure to follow the law, this Code or our policies may lead to disciplinary action which, in the most serious cases could result in dismissal in the case of colleagues, or the termination of contracts in the case of third parties.

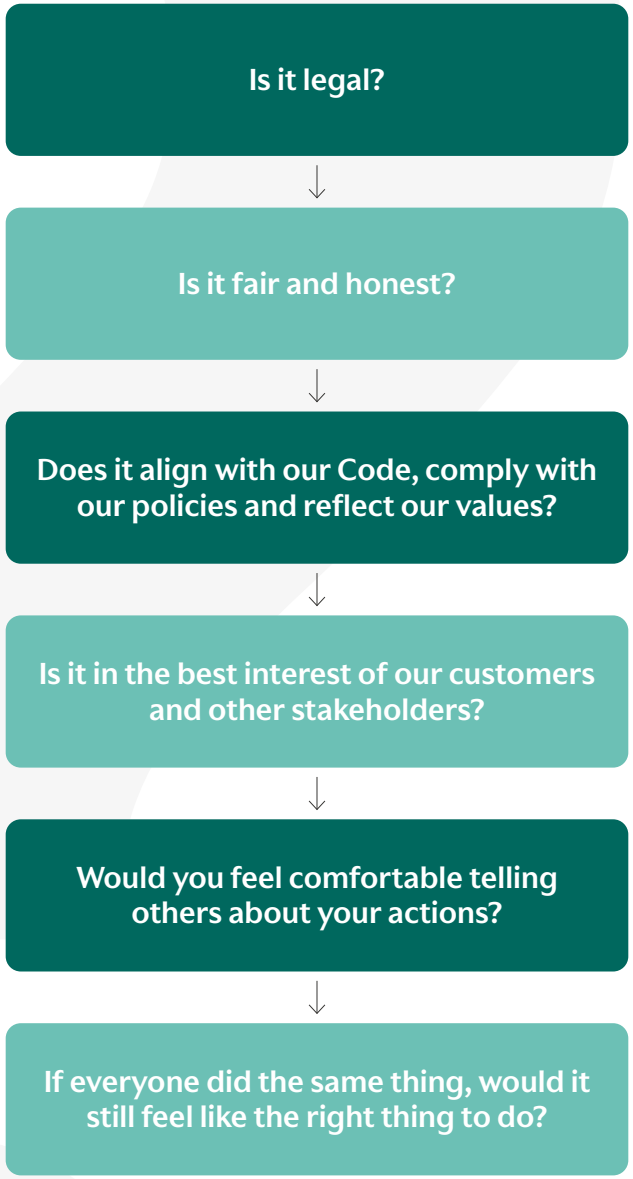
Role of leaders

Everyone at Aston Martin has a responsibility to uphold the Code and we must all follow the correct procedures and processes to achieve our goals. If you are a people manager, you have a responsibility to lead by example and to act as a role model to your team and others in the business. You should raise awareness of the Code, ensuring your team members understand how they are expected to behave and holding them accountable for meeting these expectations. Importantly, you should encourage your team members to come to you with any questions or concerns, actively listen and share helpful resources. If an issue or concern is raised with you, take ownership and ensure it is dealt with appropriately.

Doing the right thing - your decision making tool

Not sure how to handle a situation?

Our Code of Conduct cannot give you specific advice for every situation that you might face. If you are faced with a situation where you are not sure whether you would be doing the right thing, ask yourself the following questions.



If you can answer "**yes**" to these questions, then it is likely that you are on the right track.

However, if any of the answers are "**no**" or "**I'm not sure**," seek guidance before proceeding any further.

Who should I speak to?

If in doubt, test your thinking with a trusted colleague or manager or seek out the opinions of people who may have a different point of view. You can get advice on our legal obligations from subject matter experts in the business. The Human Resources Team, along with policy and process owners, can help with any questions you may have about our values, policies, processes and this Code. The Compliance team can also offer support in understanding the Code, your obligations and those of the Company.

It's not always easy to do the right thing. There are pressures on all of us to get things done but when we cut corners or fail to follow the rules, we put the Company and ourselves at risk.

Speaking up



We all share the responsibility to speak up if something does not seem right. Have the courage to speak up if you see something that's not right or you are asked to do something that's not right. Be open and respectful to colleagues who challenge the actions or decisions of others.

If you have concerns about what is happening or the way that things are being done, we want to hear about them. Knowing about issues gives us a chance to address them.

If you suspect any behaviour to be unlawful, or think it may breach a regulatory requirement, you must report it immediately. This also applies to any actions that you believe go against a Company policy or this Code of Conduct, including actions by third parties, such as suppliers. We also encourage you to raise any other concerns you may have, such as ethical issues, breaches of procedures and improper behaviour. If you have concerns about how you personally have been treated at work, these are better dealt with through our dedicated grievance processes.

We take all concerns seriously and will investigate them as appropriate. We will support anyone who raises concerns, even if those concerns turn out to be unfounded. We will not tolerate any retaliation against colleagues who raise concerns in good faith, as described in our *Confidential Reporting Policy*, and will protect anyone who has spoken up if retaliation is identified.

How do I report my concerns?

We encourage open communication at Aston Martin, especially around sharing and addressing concerns.

To raise a concern, we recommend starting with one of the following:

- Your line manager or another manager
- Your Human Resources representative

If you feel uncomfortable with these options, you may want to report your concern to someone who is further removed from the situation, such as the General Counsel, the Director of Internal Audit & Risk Management, the Director of HR & Reward or the Corporate Compliance Officer.

Ultimately, the person you feel comfortable speaking to about the issue is the right person to go to.

We know that speaking up is not always easy, which is why we also offer confidential reporting channels. You can always raise your concerns confidentially (or even anonymously) via our external confidential reporting service – **SpeakUp**. The SpeakUp service is run for us by a third party, meaning that no one in the company can trace any calls or messages that are posted on it or reported via it. All confidential reporting is managed in line with our Confidential Reporting Policy, and we ensure that your confidentiality is preserved during the entire process.

You can contact the SpeakUp service via telephone or via the web at *www.astonmartin.ethicspoint.com*.

You can find more information about how the SpeakUp service works, including all of the contact details, on the Company's intranet.

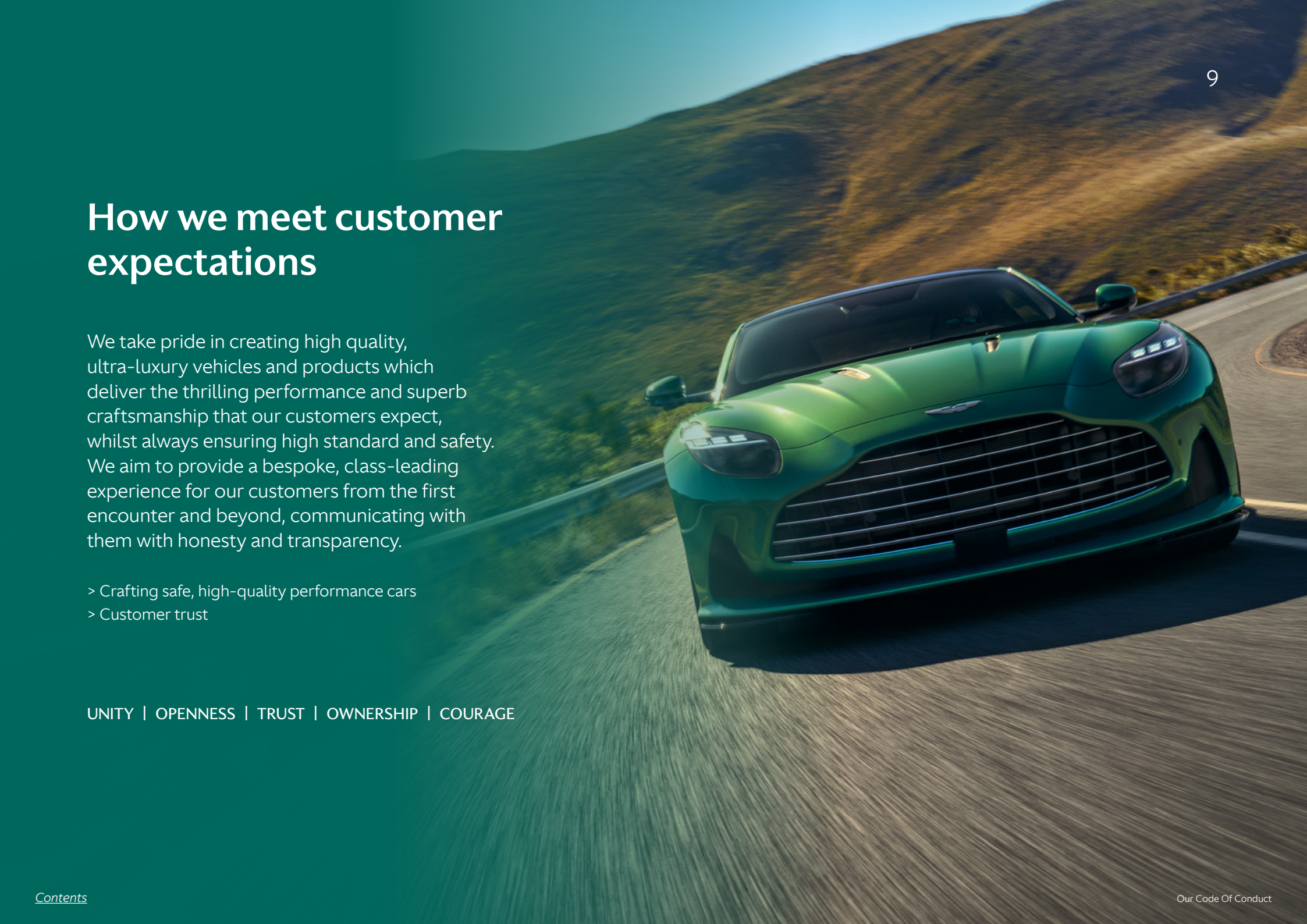
Together, we can protect our Company and contribute to its success by speaking up when something is not right.

How we meet customer expectations

We take pride in creating high quality, ultra-luxury vehicles and products which deliver the thrilling performance and superb craftsmanship that our customers expect, whilst always ensuring high standard and safety. We aim to provide a bespoke, class-leading experience for our customers from the first encounter and beyond, communicating with them with honesty and transparency.

> Crafting safe, high-quality performance cars
> Customer trust

UNITY | OPENNESS | TRUST | OWNERSHIP | COURAGE



Crafting safe, high-quality performance cars

Our commitments

We design and build exceptional cars with excellence and precision. In doing so, we take the safety and security of our customers seriously and seek to deliver the highest standards, ensuring compliance and embracing best practice. We understand the expectations of our customers and comply with regulatory requirements, including environmental standards. By following the pillars set out in our Quality Policy, we inspire customers with focused luxury products, drive stronger brand affinity and enhance relationships with our customers.

We have robust safety, security and quality control processes and standards in place and train you on those procedures. We take steps to continuously improve and innovate so that we stay at the forefront of technology. This is a key enabler to deliver on our commitment to design and build sustainable vehicles for the future.

Increasingly, customers are also entrusting us to provide a platform for the provision of internet connections and mechanisms to share data with other devices, through connected cars. We aim to manage the cyber security and personal data risks responsibly, ensuring we comply with legal requirements and are transparent with customers.

What does this mean for me?

- I pay attention to the details, focusing on delivering the craftsmanship, precision and innovation in the vehicles and products I help to create.
- I understand the rules, internal standards and processes within the Quality Management System that govern my area of work and comply with them. I do not cut corners.
- I do not compromise on anything that could affect product compliance or approval, quality, security or safety.
- I ensure that any changes to existing products or new products meet legal and regulatory standards.
- If I notice a safety, compliance or quality issue, I raise it immediately with a manager.

Who can I speak to about this?

You can always speak to your line manager but if you need more support, speak to:

- Quality Team

What should I do in this situation?

A customer sends in a complaint regarding a technical problem. From what they say, the issue does not seem to be caused by a manufacturing fault, but rather a mistake by the driver. However, I am not entirely certain.

Raise this issue with your line manager and follow internal processes to ensure that it is properly investigated by the relevant team. Once the matter has been investigated , you should respond appropriately. Customer trust is a top priority for us, so all concerns should be dealt with in a prompt and proper manner with adequate time and attention.

Customer trust

Our commitments

Customers and enthusiasts are key to our brand and our business success. Their emotional connection with the brand enables us to build a strong and loyal customer community. We aim to create ultra-luxury services and experiences that are seamless, personalised and unique.

We are committed to providing clear and accurate information about our products, their performance and their impact. This applies to all external communications, including advertising, marketing and reporting on our sustainability performance. This means ensuring that our statements are not misleading, whether it is about the vehicle's specifications (including fuel efficiency, emissions, and performance metrics), its environmental impacts or our efforts to reduce emissions and waste.

Transparent and honest communication is essential to ensure customers have confidence in us and make informed choices when purchasing our products, and to ensure that we serve them well throughout their relationship with Aston Martin.

What does this mean for me?

- I communicate transparently and honestly about our products and our performance, both internally and externally. I raise issues internally where I see them, and don't hide or alter inconvenient facts.
- I understand the risks that may arise if we provide misleading information to our customers and carry out appropriate checks to ensure that the information I share with others, and that we publish, is accurate.
- I speak up if I notice any inaccurate information in internal reports or in advertising, reporting or other external communications.

What should I do in this situation?

I read the marketing proposal for a new vehicle that is set to be released later this year. A statement about the vehicle's emissions does not seem fully accurate to me.

Making an unsubstantiated claim regarding the sustainability of a product is regarded as greenwashing, which can seriously damage our reputation. It may also be fraud. You should speak to a manager immediately so we can investigate and ensure that the claim is correct or, if not, is corrected.

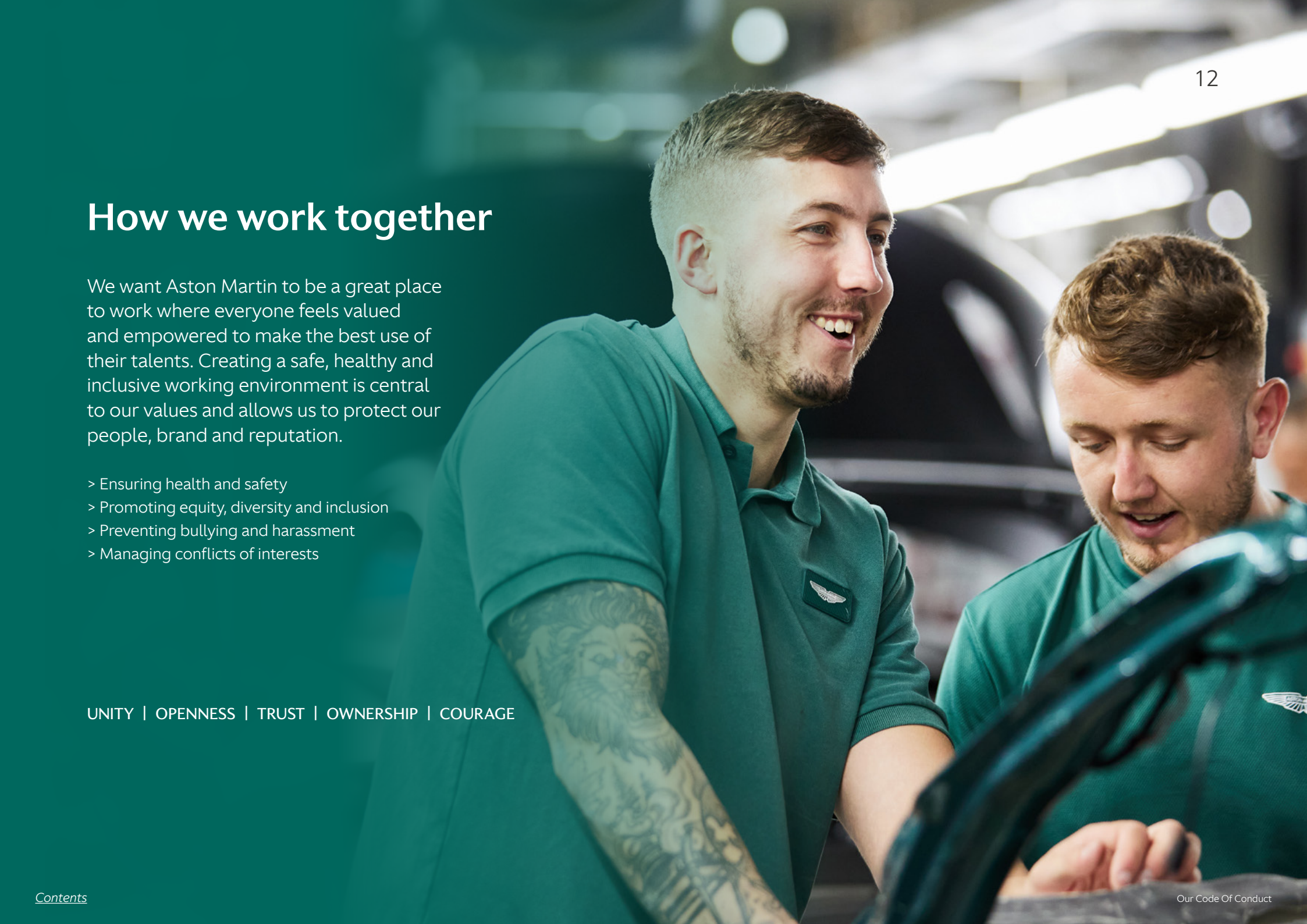


How we work together

We want Aston Martin to be a great place to work where everyone feels valued and empowered to make the best use of their talents. Creating a safe, healthy and inclusive working environment is central to our values and allows us to protect our people, brand and reputation.

> Ensuring health and safety
> Promoting equity, diversity and inclusion
> Preventing bullying and harassment
> Managing conflicts of interests

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Ensuring health and safety

Our commitments

We are committed to building the world's most desirable cars in the safest way possible, where your health, safety and wellbeing, as well as that of our business partners, customers and visitors, is the priority everywhere we operate. We do so by providing a safe and healthy working environment for everyone involved.

We promote a strong safety culture through health and safety training and risk assessments, as well as health and safety performance monitoring. We are committed to meeting all applicable health and safety laws and requirements, and work towards implementing best practice through continuous improvement in our approach to health and safety.

We will support colleagues to speak openly about their own health and wellbeing. Our wellbeing activities aim to help all colleagues take care of their mental and physical health by providing helpful tools and resources. We also offer access to confidential counselling and support.

What does this mean for me?

I am always focused on maintaining a working environment that minimises the risk of accidents, injuries, and illnesses, to myself and others. This means that:

- I take responsibility for my own health and safety and protect the health and safety of those around me.
- I follow all policies and procedures set out in the Health and Safety Policy and the Health and Safety management system, and never take shortcuts or bypass procedures to get quicker outcomes in an unsafe manner.
- I help to build a strong safety culture by reporting anything unsafe as soon as I become aware of it, suggesting improvements and completing all mandatory safety training.
- I report any incidents or near-misses using the correct *channels*.
- I contribute to an open workplace where people feel comfortable speaking about health, including physical and mental health and wellbeing. I do so by listening with understanding and sharing my own thoughts, ideas and experiences.
- I do not use or possess illegal drugs at work and do not work under the influence of drugs or alcohol in line with the Drugs and Alcohol Policy.

Where can I find out more?

- *Health and Safety Policy*

Who can I speak to about this?

You can always speak to your line manager but if you need more support, speak to:

- Health and Safety Team
- Occupational Health Team

What should I do in this situation?

I repeatedly witness a colleague from another department working without the correct PPE. I mention it to them, but they do not take any notice. It has nothing to do with me, but I feel the need to raise the issue with someone, as I am worried about my colleague's safety.

We all have a responsibility in ensuring each other's safety. It is important to speak up when you see something that doesn't seem right. You should raise your concern with a manager who can help you deal with the issue and escalate it if necessary.

Promoting equity, diversity and inclusion



> At Aston Martin we believe in each other, our unique abilities and understand we are stronger together. We support everyone to be heard and cherish diverse perspectives that help us collaboratively thrive. We are fuelled by passion, dedication and a fundamental respect to be held accountable as we drive excellence forward. We are supported to succeed and belong.
>
> Founding members of the Inclusion Network

Our commitments

We aim to create an inclusive culture and promote a working environment in which everyone is treated with respect, dignity and fairness. This means we do not tolerate discrimination on any grounds, including age, disability, sex and sexual orientation, gender reassignment, race, religion or belief, marriage and civil partnership, pregnancy and maternity. Discrimination based on work patterns, such as part-time working and fixed term contracts, is also not tolerated.

We provide equal opportunities to all individuals by ensuring that employment-related decisions (such as hiring, pay, promotion, training, termination and terms of employment) are based on merit and objective criteria to help enable everyone to fulfil their potential. We also seek to attract and develop a broad range of talent that reflects the diverse communities within which we operate, and actively promote diversity and inclusion in the workplace through our Inclusion Network.

Our Inclusion Network is a voluntary group that aims to create a safe space where you can share knowledge, experiences, and key diversity and inclusion moments. It is a space that empowers us all to play an active role in raising awareness and creating a welcoming environment across Aston Martin. You can find out more on the Company intranet.

I AM Inclusion

Promoting equity, diversity and inclusion

What does this mean for me?

I adhere to the principles and procedures of our Equality, Diversity & Inclusion Policy. This means that:

- I treat everyone with the same respect regardless of their background. This includes being mindful of any potential prejudice I might have in favour or against anyone else (also known as bias), recognising that bias can be both conscious and unconscious.
- I help Aston Martin provide equal job opportunities by sharing opportunities across a diverse pool of candidates. Where relevant to my role, I assess candidates based on their capability to perform the job and objective criteria.
- I take action if I witness or experience any discrimination, or harassment (including thirs party harassment) for instance by speaking up and reporting any concerns.
- I actively participate in fostering an inclusive and open culture by inviting and listening to diverse perspectives, conducting myself in a way that makes others feel valued and included, encouraging colleagues to do the same.

Who can I speak to about this?

You can always speak to your line manager but if you need more support, speak to:

- Human Resources Team
  NAVEX Reporting

What should I do in this situation?

I need to recruit a new member of my team. I know not to factor in attributes like race, gender, or age when choosing a successful candidate, to avoid bias in the selection process. However, there has also been a lot of emphasis on enhancing team diversity recently. I'm unsure how to balance these commitments.

We must seek to provide equal opportunities to all by ensuring hiring decisions are based on merit and objective criteria, rather than protected characteristics (characteristics specific to an individual which are protected by the law).
To achieve this, we should make sure that the pool of talent we hire from is as diverse as possible. You should consider how you can promote the job opportunity more widely and eliminate the barriers that might deter candidates from under-represented groups from applying. Then all applications should be treated impartially and without bias.

Preventing bullying and harassment

Our commitments

We are committed to providing a workplace free of harassment. This is reflected in our zero-tolerance stance towards any form of **harassment** and **bullying**, including **sexual**, **physical**, **psychological, verbal and third party harassment**. We take grievances seriously, whether they come from you, our customers, dealers, partners, suppliers, visitors, the public or any others and will take appropriate action to address them. We seek to a create a culture of trust and respect, where any colleague who experiences or witnesses bullying or harassment knows that concerns will be listened to and addressed.

What does this mean for me?

- I reflect on how my actions may impact others and do not make anyone feel uncomfortable.
- I build unity and trust in my team by working with everyone in a respectful manner.
- I understand that I can be held to account for acts of bullying, harassment, victimisation and discrimination in the course of my employment, whether it is against colleagues, customers, suppliers or the public, and I do not engage in these harmful behaviours.
- I challenge any instance of harassment, bullying or other disrespectful behaviour by speaking up and reporting the issue.

Who can I speak to about this?

You can always speak to your line manager but if you need more support, speak to:

- Human Resources Team
  NAVEX Reporting

What should I do in this situation?

A colleague has made several sexist jokes on an email chain that have made me feel uncomfortable. When I discussed this with them, they said I was being overly sensitive.

Sexist jokes or comments are not acceptable at work and should be challenged. If behaviour makes you uncomfortable, you can tell the person that their comments are inappropriate and ask them to stop, if you feel comfortable doing so.

You do not have to deal with the situation alone or wait for it to happen again. You can raise the concern with your line manager or the HR Team so that appropriate action and support can be considered.

Managers who become aware of inappropriate behaviour should take the concern seriously and act appropriately by following our reporting process. Everyone has a part to play in challenging inappropriate behaviour and creating a respectful and inclusive workplace.

Managing conflicts of interests

Why this matters

We recognise that situations may arise at work where personal or financial interests might appear to clash with the interests of Aston Martin. This could be, for instance, having a financial or professional interest in a business connected to Aston Martin (such as a supplier), or being in a close relationship with someone who reports to you. These situations might represent **conflicts of interest** and need to be managed appropriately to ensure we work together in a fair and transparent manner and build trust both within our teams and with external stakeholders. To this end, we request everyone to report actual or potential conflicts of interest. Where a conflict of interest is identified, we will agree a way forward that will remove or manage any risks by putting appropriate safeguards in place.

What does this mean for me?

- I always act in the best interests of the Company and seek to avoid personal activities and financial interests which could conflict, or appear to conflict, with my responsibilities at Aston Martin.
- I am aware of situations which may be perceived as a conflict of interest and ask for guidance when in doubt.
- I understand that even an appearance of a conflict of interest may be detrimental if it is not disclosed and managed properly.
- I disclose any potential or actual conflict of interest, whether personal or financial, following the procedures set out in the Conflicts of Interest Policy. I understand that having a conflict of interest is not wrong, but concealing it is.

Who can I speak to about this?

You can always speak to your line manager but if you need more support, speak to:

- Human Resources Team

What should I do in this situation?

I manage a small team of people and there is a vacancy for a junior position in my team. My nephew is a young professional with experience in the industry and this new vacancy aligns with his skills and aspirations. There are already a few other strong candidates, but I would love to offer my nephew the opportunity to join our team.

We should always act in the best interests of Aston Martin and avoid any situations that may represent, or be perceived to represent, a conflict of interest. This includes your involvement in the recruitment of a friend or relative. You should speak to the Human Resources Team or your line manager to understand how to approach the situation. If your nephew applies for the job, you should officially declare the potential conflict of interest and exclude yourself from the hiring process.

How we choose and work with partners

We aim to work with business partners who align with our values and meet our high expectations not only in terms of quality and performance but also in terms of the expectations set out in this Code.

> Selecting and working with business partners
> Authority to commit

UNITY | OPENNESS | TRUST | OWNERSHIP | COURAGE



Selecting and working with business partners

Our commitments

We work with many business partners, including suppliers, dealers, licensees, agents, joint venture partners, influencers and others. Before entering into any relationships, we carry out **due diligence** to ensure we know who we are really working with. We then monitor that they continue to meet our requirements, including, where appropriate, on health and safety, working conditions and the environment. We take extra care when appointing a third party to represent us or perform services on our behalf.

We are committed to responsible sourcing and choose and monitor suppliers in accordance with our internal procurement policies and processes. We require suppliers to commit to our Responsible Procurement Policy, and to be able to demonstrate that they meet our quality, compliance, sustainability and ethical standards.

We expect third parties with whom we do business to seek to follow the UN Guiding Principles on Business and Human Rights and not infringe upon the human rights of others, including through forced labour, human trafficking or child labour, either in their own business or supply chains. This helps to promote responsible business practice and protect our reputation.

What does this mean for me?

- I adhere to the Company's processes and respect the rules on how we select and work with third parties – whether this is our procurement processes for the selection of suppliers, our processes for appointing dealers, or those for choosing the parties with whom we agree to work or to whom we licence our brand.
- I follow fair, transparent and open processes when selecting business partners, basing my decision on objective criteria. This includes the commitment to the Responsible Procurement Policy for suppliers.
- Before we engage with potential business partners, I ensure that they are properly vetted and have appropriate contractual obligations in place. I make sure that they are regularly monitored during their engagement or work with Aston Martin.

Where can I find out more?

- *Responsible Procurement Policy*

Who can I speak to about this?

You can always speak to your line manager but if you need more support, speak to:

- ST&P Procurement
- Office of the General Counsel
- Sustainability Team

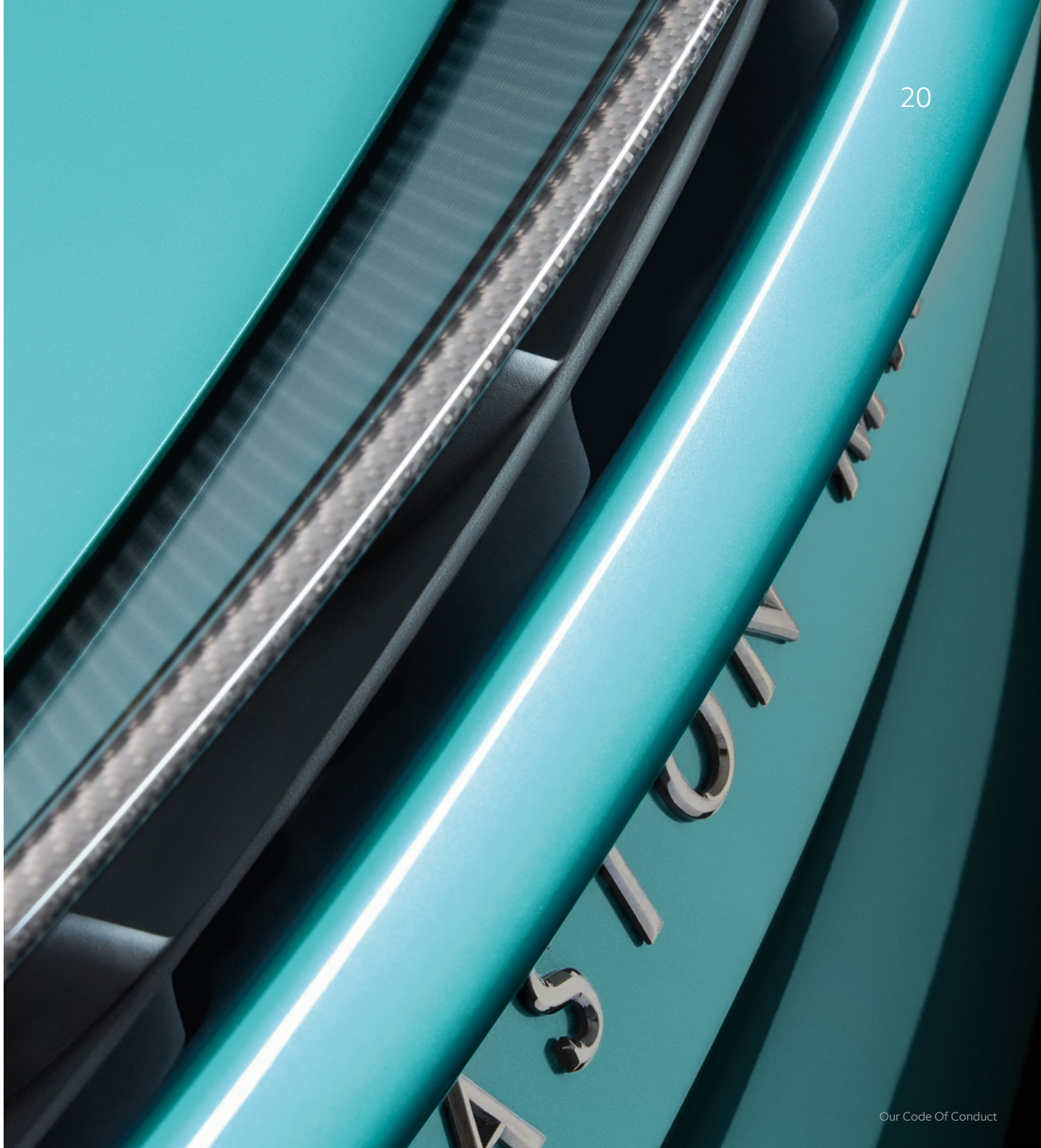
What should I do in this situation?

I work in the Procurement Team and need to decide whether to go ahead with a potential supplier. The supplier has the required competencies and offers competitive prices, but it has refused to provide information on how it manages health and safety, environmental and human rights risks in its own operations and supply chain.

You should engage with the supplier further and ask them for the reason they cannot provide the required information, and clearly communicate Aston Martin's social and environmental standards to them. If the supplier still refuses, you should discuss with your line manager and with the Office of the General Counsel how best to deal with this situation. This refusal raises serious concerns and requires investigation. We want to work with suppliers that meet our expected standards.

Authority to commit

No one should commit the company to expenditure or other forms of obligations (such as contracts, licences, sourcing decisions and other agreements) unless they have authority to do so under the Company *Delegations of Authority Policy*, and have followed all relevant processes, including obtaining all required approvals. We expect you to understand how the Delegation of Authority rules apply to your work, and to follow these rules. Check the Policy to find out the authority levels..



How we conduct our business

We seek to conduct our business in accordance with all applicable domestic and international laws – not only because it is a legal imperative, but because it is the right thing to do. We will not condone breaches of the law and will take action where any potential breaches are identified.

> Maintaining financial integrity
> Preventing bribery, corruption and fraud
> Gifts and hospitality
> Competing fairly
> Complying with international trade and customs laws

UNITY | OPENNESS | TRUST | OWNERSHIP | COURAGE



Maintaining financial integrity

Obtaining licences and permits required to operate

Our business and sites are subject to local regulations, including the requirement to obtain permits or licences to conduct certain activities and to meet environmental standards and reporting requirements. We are committed to complying with all requirements in relation to obtaining permits and licences and do not tolerate breaches of required procedures – needing to get something done quickly can never be an excuse for not complying with the law. Plan ahead and ask for guidance from the Maintenance & Facilities team or the Environmental team.

Our commitments

By upholding financial integrity, we meet our ethical principles and build trust with our business partners, investors and the general public. This requires being rigorous in how we manage our books and records. We ensure that any financial information (for example our financial performance) provided to third parties is accurate and that our financial transactions are recorded in accordance with relevant accounting standards and audited annually by our external auditors.

We also take steps to ensure that we do not facilitate or support the commission of financial crimes by other parties, including **money laundering**, tax evasion and fraud. This involves identifying risk areas, putting controls and systems in place to manage the risks, conducting appropriate due diligence on our business partners and monitoring suspicious transactions.

What does this mean for me?

- I am fully aware of and comply with all internal policies and controls relating to keeping accurate financial and business records relevant to my role. This includes capturing all transactions accurately and honestly and carrying out checks where needed.
- I speak up if I notice a mistake in a financial record or any indications of fraud.
- I conduct 'know your customer' type checks on third parties and maintain records of these checks as required by our internal policies and processes, including the Anti-Money Laundering Policy and the Prevention of Facilitation of Tax Evasion Policy.
- I look out for 'red flags' pointing to risks of money laundering, tax evasion or fraud by a business partner and I speak up if I observe anything suspicious.

Who can I speak to about this?

You can always speak to your line manager but if you need more support, speak to:

- Finance Internal Controls Team
- Compliance Team

What should I do in this situation?

I recently discovered some discrepancies in the inventory records for certain pieces of equipment, as the inventory records do not align with the physical count. There also seem to be some alterations to the purchase orders for this piece of equipment, and it has been changed to a lower price than the original cost. I wonder if this may be a mistake or someone attempting to hide financial information.

This could be a series of mistakes or a deliberate breach of our rules around financial integrity. Either way you should report this to the Internal Controls Team or the Corporate Compliance Officer. You should not try to investigate the matter yourself but instead allow the designated team to carry out further checks.

Preventing bribery, corruption and fraud

Our commitments

Acts of bribery, corruption and fraud are illegal, harmful to society and undermine our integrity.

We have zero tolerance towards corrupt or fraudulent behaviour by any stakeholder, including our employees, business partners, customers, dealers or others, and uphold all laws relating to countering bribery, corruption and fraud in all the jurisdictions in which we operate. We take steps to identify risk areas and prevent such behaviour by putting controls and systems in place.

What does this mean for me?

- I abide by the processes and procedures set out in the Anti-Bribery, Corruption & Fraud Policy to prevent bribery, corruption and fraud from taking place.
- I do not offer, give or receive bribes in any form and do not mislead others.
- I follow official channels to get business done and do not seek to find unlawful ways around these. This includes not making payments to speed up an official process (often referred to as 'facilitation payments') or to alter an outcome of one.
- I stay alert to any 'red flags' which indicate a risk of corruption, bribery or fraud.
- I report any concerns or suspicions of corrupt or fraudulent behaviour and ask for advice when in doubt.
- I ensure that all information and data is accurate and complete, and check before releasing any information.

Where can I find out more?

- *Anti-Bribery, Corruption & Fraud Policy*

Who can I speak to about this?

You can always speak to your line manager but if you need more support, speak to:

- Compliance Team

What should I do in this situation?

My team is working under a very tight deadline for an upcoming high-profile product launch. I'm overseeing the importation of some critical car components for the launch and there are multiple components being held up at the customs office in a foreign country. My colleagues on the ground are telling me that the customs officials are demanding to be paid an extra fee in cash to expedite the clearance process. I know this could be perceived as unethical, but I think this is just how things work in this country.

Paying the customs officials an unofficial fee to speed up the process is a facilitation payment, which is outlawed under UK and other bribery laws. Paying this could have serious legal and reputational consequences for Aston Martin and individuals. You should immediately advise your colleagues not to do this and speak with your manager or the Head of Compliance if you are concerned about the decisions they are making.

Gifts and hospitality

Our commitments

The exchange of low value **gifts and hospitality** with a third party can support good business relationships, provided they are modest and appropriate in the circumstances. Excessive or inappropriate gifts or hospitality could present a risk of bribery, or the perception of bribery, and harm our reputation.

We do not use gifts and hospitality to encourage others to do something that they should not. Equally, we do not accept gifts and hospitality that could cloud our judgment and impact our business decision-making. We recognise that particular care must be taken around offering gifts or hospitality to public officials, as this is outlawed completely in some countries, and always presents a higher risk.

What does this mean for me?

I understand the principles and processes in the Gifts and Hospitality Policy and handle all gifts and hospitality in line with them. This means that:

- I do not offer or accept any gift or hospitality that may create a sense of obligation for either the giver or receiver to do something in return.
- I decline any gifts or hospitality that are prohibited (such as cash or equivalent).
- I consider the nature and value of the gifts and hospitality and the context in which they are given or received to assess whether the exchange is acceptable, using my best judgment.
- I seek approval to give or accept gifts or hospitality above £100 in value.
- I always seek approval from senior management and consult the Sustainability team before offering gifts or hospitality to public officials, irrespective of the value.
- I declare and register all hospitality or gifts accepted or offered (unless they are exempt under the Policy) in the *Gifts & Hospitality Register*.

Where can I find out more?

- *Anti-Bribery, Corruption & Fraud Policy*

Who can I speak to about this?

You can always speak to your line manager but if you need more support, speak to:

- Human Resources Team
- Compliance Team

What should I do in this situation?

Our key contact at our printing supplier has offered me and a few other colleagues some tickets to a football match in London. He says it would be a good opportunity to get to know one another a little better and talk business. I'm not sure whether to accept.

Ask yourself: Is there a business purpose to attending this event? Developing good business relationships can be an acceptable business purpose in some circumstances but is the event appropriate? Is there anything else going on that would make it unwise to accept this, such as a current tender process? Is the value of the hospitality excessive? In line with our Policy you must seek approval before accepting any hospitality above £100 and record the offer (even if declined) in our Gifts and Hospitality Register. If you are not sure of the value or are concerned in any way, discuss with your line manager or the HR Team.

Competing fairly

Our commitments

We are committed to competing fairly on the merits of our products and services as free and fair competition fuels innovation, pushes boundaries and helps to enhance products.

We do not take actions that are illegal under competition (anti-trust) laws, such as entering into agreements with competitors, suppliers or customers that would restrict or prevent competition, or by sharing **competitively sensitive information**. We comply with the specific competition law rules relating to distribution systems in our dealings with our authorised distributors and dealers, and we comply with the rules around aftersales markets in the supply of spare parts and in relation to servicing and maintenance services.

What does this mean for me?

I comply with our Competition Law Policy and all applicable competition laws. This means that:

- I do not collude with a competitor on important issues like pricing, business plans, technical developments, aftermarket strategies or customers. This includes not exchanging competitively sensitive information with competitors – directly or via a third party.
- I am conscious that sometimes our current or potential suppliers or investors are also our competitors, and treat them accordingly.
- I follow our internal processes to ensure that we treat dealers, distributors and aftermarkets customers consistently, fairly and lawfully. I do not seek to control or restrict the resale prices or terms set by an independent dealer or others for our products.
- I am extra careful when meeting with competitors, including through trade associations or similar bodies, and I ensure this activity has been approved and appropriate measures are in place to manage these meetings.
- I consult with the Office of the General Counsel when in doubt, as competition law is complex and the cost of getting it wrong is very high.

Who can I speak to about this?

You can always speak to your line manager but if you need more support, speak to:

- Compliance Team
- Office of the General Counsel

What should I do in this situation?

During a coffee catch-up, a friend who works for a competitor starts to share some information about their company's business plans.

You must stop your friend immediately and make it very clear that you cannot discuss such matters with them. Document the conversation and inform the Corporate Compliance Officer, who will advise on the steps to be taken. You should not use the information in any way inside Aston Martin. It's ok to meet up with friends who work for competitors, but you need to keep the conversation away from details of what's happening at work.

Complying with international trade and customs laws

Why this matters

When we send or move goods, services or software across national borders, correct customs and export / import documentation must be completed, taxes may be payable, and licences may be required for some items (export controls). We check and comply with these requirements. Failure to do so can have personal consequences for individuals as well as for the company. This protects all of us from fines, reputational damage and the loss of applicable trade licences and customs simplifications.

Furthermore, international trade embargoes or sanctions prohibit the movement of items to or from certain countries, certain transactions and the parties with whom Aston Martin can work. We observe sanctions laws and do not engage in prohibited dealings with sanctioned countries, companies, or people.

What does this mean for me?

- Every time that there is a planned movement of goods, technology or services across national borders, I check whether any import or export restrictions or customs rules apply and follow all necessary processes in advance to ensure we meet our obligations.
- I understand that international trade laws impose restrictions on moving items that could have a **dual use** and that I need to make the appropriate checks before ordering items or organising transportation..
- I apply due diligence and sanctions checking processes for third parties in accordance with the Sanctions Policy to ensure that the transaction or parties are not sanctioned.
- I report any suspicions of breaches to these laws and internal processes.
- If I have any queries or concerns, I check the Trade & Customs Hub and / or seek guidance from the Trade & Customs Team.

Who can I speak to about this?

You can always speak to your line manager but if you need more support, speak to:

- International Trade & Customs Team
- Office of the General Counsel

What should I do in this situation?

A customer requests the amendment of an invoice value to a lower amount to "help" them with the importation process in their home country.

Deliberately reducing the value of a product – potentially in this case to enable the customer to reduce or avoid certain import duties - could result in significant fines and penalties to Aston Martin, reputational and brand damage as well as potential criminal prosecution. You should seek guidance from the Trade & Customs Team if you are unsure how to proceed.

How we represent Aston Martin and our brand

Aston Martin is an iconic, globally recognised brand with a unique position transcending ultra-luxury and high performance. For more than a century, our brand has symbolised exclusivity, elegance, power and sophistication. Protecting our brand and the reputation of our business is central to our future.

> Representing or speaking on behalf of the Company
> Use of social media
> Respecting Privacy: Photography, Video and Audio Recording
> Engaging with political and governmental bodies
> Artificial Intelligence

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Representing or speaking on behalf of the Company

Why this matters

The way that we represent our brand is a key part of who we are and what we do. That is why we are committed to maintaining a unified and consistent brand image, ensuring that we protect our reputation in all external communications to build confidence from our customers, investors and stakeholders.

What does this mean for me?

I follow internal procedures when it comes to representing Aston Martin in external communications. This means that:

- I do not speak for or on behalf of the Company, unless authorised to do so. This includes situations when I am approached by the media or asked to speak or represent Aston Martin at an event. I pass on all media enquiries to the Corporate & Brand Communications Team as soon as I receive them.
- I behave respectfully and responsibly if I am representing Aston Martin at an event, ensuring that I promote a positive image of the Company and if presenting or speaking, share only approved information.
- I never share information or pictures that I am not authorised to share.
- I respond to customer complaints in accordance with the established processes in the Commercial function.
- I do not include content in internal or external emails that is inappropriate and could prove damaging to the Company's reputation.



Who can I speak to about this?

- Communications Team
- Sustainability Team

Use of social media

Why this matters

Whilst we encourage everyone to share Aston Martin content and promote our iconic brand, it is also part of our responsibility to protect our brand from harm. Any comment that is made online in relation to our company – even if well intentioned or accidental – can have a significant impact on our business, our team and our reputation. It is important to be honest and transparent in our online communications and we encourage others we work with, including journalists, media outlets and influencers, to respect this commitment. We also never use undue influence to interfere with the content that they share across media channels.

What does this mean for me?

I adhere to the processes outlined in our Social Media Policy. This means that:

- I am personally responsible for the content that I publish on my social accounts.
- I make it clear that my social media posts are my own thoughts and opinions, never giving the impression that my views represent those of the Company.
- I always seek to protect the company's reputation and do not publish anything online that could damage it.
- I never share business confidential information (including on site photographs) on any online or social media platform.
- I speak to the Corporate Brand & Communications Team if I have any questions or concerns about what can and cannot be posted on social media.
- Before sharing any workplace photograph, video or audio recording, I comply with the "Respecting Privacy: Photography, Video and Audio Recording" section.

Who can I speak to about this?

You can always speak to your line manager but if you need more support, speak to:

- Corporate & Brand Communications Team

What should I do in this situation?

I come across a social media post that speaks about Aston Martin in a negative light, making claims that are clearly untrue.

While it may be tempting to correct false information that you see online, it is better to let the Corporate Communications Team know about the post and let them respond as needed.

Respecting Privacy: Photography, Video and Audio Recording

Our commitment

We respect the privacy, dignity and personal information of everyone who works for, visits or engages with our business. Photography, filming and audio recording must be undertaken only for a legitimate purpose and in accordance with our Group Policies.

What does this mean for me?

I follow internal procedures when it comes to representing Aston Martin in external communications. This means that:

- I do not photograph, film, livestream or record a colleague, contractor, agency worker, visitor or other individual for personal or informal purposes without their knowledge and permission.
- I only record meetings, presentations, workshops, conversations or other workplace activities if there is a legitimate business reason and participants have been informed.
- I understand that an individual's permission does not by itself authorise photography or recording and will obtain other approvals as appropriate before recording.
- I respect a reasonable request not to be included in an optional photograph or recording.
- I do not use personal devices, applications or accounts to capture, store or share workplace recordings unless specifically authorised.
- I do not share, edit or reuse images, videos or recordings for a different purpose from the one originally approved.
- I take care not to capture confidential information, personal data, prototype vehicles, production processes, security arrangements, system displays, documents or other business-sensitive material.
- I store, retain, use and delete recordings in line with our data-protection, information-security and records-management policies.
- I report any inappropriate or unauthorized recording promptly to my line manager, Human Resources, Site Security, the Data Protection Officer or our SpeakUp service.

Where can I find out more?

- Data Protection Policy
- Social Media Policy
- Acceptable Use of Company Systems
- Confidential Reporting Policy

Who can I speak to about this?

You can always speak to your line manager, but if you need more support, speak to:

- Human Resources
- Data Protection Officer

Artificial Intelligence ('AI')

Our commitment

We are committed to the responsible, secure and effective use of AI, recognising its benefits and risks. We want to ensure lawful, ethical and accountable use of AI across its lifecycle, whilst supporting operational excellence.

What does this mean for me?

- I must only use Company-provided AI Tools and only for approved purposes, in accordance with our AI Policy.
- I will apply necessary risk assessment and monitoring measures (including human oversight) to ensure responsible and ethical use of AI.

Where can I find out more?

- Artificial Intelligence Policy

Who can I speak to about this?

- Head of Intellectual Property
- Director of IT



Engaging with political and governmental bodies

A public official may be someone who works at a local council (such as a planning or environmental officer), a member of the civil service, an employee of a public agency (such as a vehicle certification body or a police officer), a representative from industry regulators, as well as elected or appointed ministers from the UK, Welsh and other national governments.

Our commitments

As a company with a global footprint, our business is influenced by governmental decisions and the broader policy and regulatory environment. We therefore seek to maintain open and constructive engagement with governments and public bodies to ensure our views are understood as key policy is developed. We engage with public officials in an honest and transparent way and maintain accurate records of all our interactions with them to ensure accountability. We also abide by applicable lobbying laws when representing our interests to policymakers on topics relevant to our business. We do not support any political parties, nor do we make political donations or sponsor political events.

Working with the UK government forms a pillar of our Racing. Green. sustainability strategy. As part of this, we commit to showcasing the very best in British engineering and design worldwide.

What does this mean for me?

- I follow our policies and processes regarding political and governmental engagement. This includes not engaging with government or political stakeholders without approval from the Government Affairs or Sustainability Teams. This means that I should check with the team if I receive any inquiries or requests from agencies, regulators, councils, or political offices in order for the team to offer helpful guidance as needed.
- I understand that I can be politically engaged in my own time, as long as I make it clear that I am acting in my own personal capacity and there is no association to Aston Martin. This means I can support political parties, candidates or campaigns in my own time and using my own money.
- I disclose any governmental or political connections, if relevant, to prevent any actual or potential conflict of interest.

Where can I find out more?

- *Aston Martin's Political Engagement Statement*

Who can I speak to about this?

You can always speak to your line manager but if you need more support, speak to:

- Government Affairs & Sustainability Team



How we safeguard Company information and assets

We expect everyone to protect **Company assets** from misuse, damage, theft or loss, including our physical and non-physical assets. Information is one of our most critical assets which is why we need to manage it correctly and ensure we protect it. We also have a responsibility where we hold information on people, to manage their personal data with care and lawfully.

We can only maintain the safety of our business, our people and our customers, as well as our competitiveness and operational efficiency if we handle information securely.

> Protecting confidential information and maintaining information security
> Protecting personal data
> Protecting intellectual property
> Inside Information: dealing in shares appropriately

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Protecting confidential information and maintaining information security

Why this matters

As you perform your work, you might have access to **confidential or sensitive information** about Aston Martin or another company with whom we work. This might include, for example, business plans, designs, engineering drawings and product launches. If such information becomes public in an uncontrolled manner (for example, a photograph of a prototype car is leaked), this could cause serious harm to the Company. It might also be inside information, the disclosure of which could affect the company's share price. For this reason, we put in place safeguards and make sure everyone involved knows how to hold information and how to keep it secure.

This is part of our commitment to protect all Aston Martin networks, devices, applications and data – including our vehicles – from attack, damage, loss, or unauthorised access. To this end, we monitor our IT systems to identify, detect and respond to any risks and threats and provide training and awareness raising to help colleagues manage our digital assets securely. As our products, operations and information become increasingly digitised, we maintain strong cyber and information security standards, processes and controls, including by building cyber security controls into our connected cars.

What does this mean for me?

- I protect Aston Martin's confidential information as well as the confidential information of others. This means that I will not disclose confidential information without proper authorisation and a business reason, and I will not talk about it in public. I also do not take photographs on site, unless given express permission to do so.
- If I am authorised to disclose confidential information, I limit it to the information that is necessary and appropriate, and I make sure that there are non-disclosure agreements in place before sharing it.
- I classify information using Aston Martin's security classification standards set out in our Use of Company Systems Policy according to its level of confidentiality.
- I ensure that in designing and creating our vehicles, I consider the cyber and information security risks and how to manage them in accordance with the Cyber and Information Security Policy.
- I understand that the security of our IT systems is also my responsibility. This means that I use our technology assets responsibly and protect information from being misused.
- I never try to find a way around a cyber or information security controls.
- I only use tools and systems authorised by IT, including authorised data storage, cloud storage providers and sharing solutions.
- I remain vigilant and report any concerns relating to the security of our digital systems, such as suspicious or unusual online activity, to the IT Helpdesk.

Protecting confidential information and maintaining information security

Who can I speak to about this?

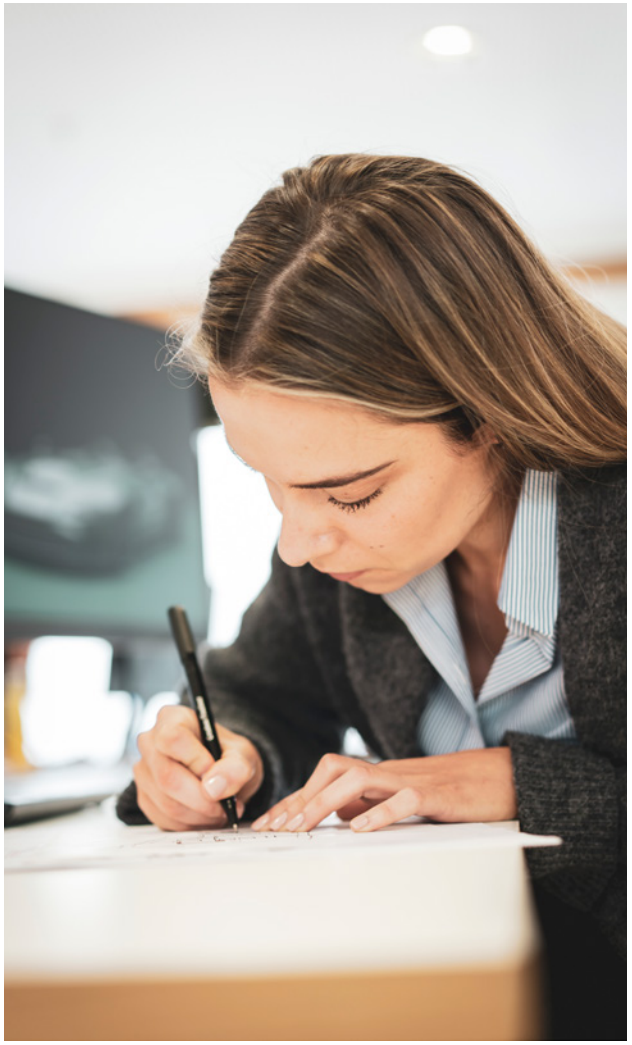
You can always speak to your line manager but if you need more support, speak to:

- Cyber & Information Security Team
- IT Team

What should I do in this situation?

While working on a new design task, I found a piece of software on the internet that could help with this project. The IT Team have not given me permission to download the piece of software, but I am facing a tight deadline and think this could help reduce my current workload.

Attempting to download software from the internet without adequate cyber protection could risk the security of your device and might provide a third party with a route to access Aston Martin information or systems. It is important to ensure any downloaded software is adequately secure and you should always check with the IT Team before downloading any non-approved software.



Protecting personal data

Personal data is any information that can be used to identify an individual, in particular by reference to an identifier such as a name, identification number, location data, or factors specific to the physical, psychological, genetic, mental, economic, cultural or social identity of the person.

A data protection breach occurs whenever the security, confidentiality, integrity or availability of personal data is compromised. This could simply be that information has mistakenly been shared with the wrong person, the loss of a laptop or folder, or a hack on our IT systems, for example.

Why this matters

We handle the personal information of colleagues, customers, business partners and other individuals in the course of our business. We do so in a way that complies with their legal rights and their expectations that their data will be managed appropriately and securely. This means processing and managing personal data lawfully, fairly and transparently, and in line with good practice which follows the principles of the GDPR and other applicable data protection laws.

Serious data protection breaches must be reported to the relevant data protection authorities within a short period of time (usually 72 hours) of the occurrence. We must act quickly to decide if a breach is reportable to the authorities and potentially the people affected by it. We have nominated a Data Protection Officer who will take the lead in determining what is notifiable and in notifying the authorities.

What does this mean for me?

- I comply with relevant data protection laws and observe the Data Protection Principles and practices set out in the Data Protection Policy.
- I handle personal data securely and do not share it with anyone inside or outside of Aston Martin without authority to do so and then I limit it to what they need-to-know. I check that any third party is authorised to receive the data and that there are appropriate safeguards in place before sharing it.
- I report any suspected data protection breaches to the Data Protection Officer at *data.officer@astonmartin.com* immediately and seek guidance if I have any concerns or questions.

Who can I speak to about this?

You can always speak to your line manager but if you need more support, speak to:

- Data Protection Officer
- Office of the General Counsel

What should I do in this situation?

While compiling a list of emergency contact details for one department, I intended to email it to an HR Business Partner. However, when inputting the recipient's email address, I typed only the first name and selected the first address that appeared. Consequently, the email was mistakenly sent to a supplier who happened to share the same first name as the HR BP.

Promptly acknowledge the error to your line manager as sharing personal data to unintended recipients is a serious issue. If the communication platform permits, you should try to recall or delete the email. Immediately report the incident to the Data Protection Officer and seek guidance on next steps. When intending to share or transfer personal data, it is good practice to use password-protected documents or encrypted formats.

Protecting intellectual property

Our commitments

At Aston Martin we own valuable **intellectual property** (IP), for example in brands, designs, inventions, digital and electronic assets, as well as other confidential information. We protect our IP to preserve the beauty, craft, technological excellence and heritage that are at the heart of our brand. This enables us to stay competitive and successfully deliver our strategy. We also make sure that third parties are subject to appropriate safeguards when granted the right to use our IP.

This allows us to meet our three IP goals, to:

a. Acquire and protect our valuable IP. This means complying with applicable laws and ensuring that we own the appropriate rights to freely use and safeguard our IP.

b. Maximise the value of our IP.

c. Respect valid third-party IP rights. This includes only using third parties' IP when authorised to do so.



What does this mean for me?

I handle IP with care and adhere to the processes outlined in our Intellectual Property Policy. This means that:

- I ensure that I do not inadvertently disclose any of our trade secrets, inventions or new designs outside the Company.
- If I create any original work, such as new designs and technologies, or modify an existing work, I contact the Office of the General Counsel to determine if there is a need to check for third party rights or apply for IP rights.
- I never use access to company IP (such as brand logos or photography) to produce personal material or unapproved branded items.
- I keep up-to-date electronic records of our management of IP, evidencing its creation, maintenance and use.
- I only use third-party IP with company authorisation and third-party consent, and after consultation with the Office of the General Counsel.
- I report any suspected breaches of intellectual property to the Office of the General Counsel immediately.

Who can I speak to about this?

You can always speak to your line manager but if you need more support, speak to:

- Office of the General Counsel

Inside Information: dealing in shares appropriately

Why this matters

Aston Martin shares are publicly traded on the London Stock Exchange, and we therefore have processes and regulations in place to ensure that we treat Inside Information appropriately and publicly disclose it immediately (unless we have a legitimate reason to delay) to ensure that all our shareholders have the same information upon which to make their investment decisions.

Inside Information is information that is not publicly available and which a reasonable investor would consider important when deciding whether to invest in Aston Martin shares. Inside Information, if made public, would be likely to have a significant impact on the value of Aston Martin shares. Buying or selling shares based on Inside Information can be a criminal offence.



What does this mean for me?

I comply with all laws against insider trading and market abuse and abide by the instructions set out in the *Aston Martin Share Dealing Code*. This means that:

- If I have knowledge or information which, if spoken about outside of the business, could potentially in the future be considered Inside Information, I keep that information confidential.
- I consider before I share any information, internally or externally, whether it could potentially be Inside Information.
- I do not deal in shares or securities based on Inside Information, nor do I induce or encourage others to engage in insider trading.
- I do not share Inside Information with anyone unless I have approval from the Company Secretary to do so.
- Buying or selling shares based on Inside Information or encouraging others to do so is prohibited and we comply with all insider dealing and market abuse laws and regulations.
- I seek guidance from the Company Secretary if I am unsure whether something is Inside Information or whether I am allowed to buy or sell shares in my situation.
- The Company Secretary will inform me if the Company is aware of information that could become Inside Information and I will follow the procedures as set out in the Share Dealing Code and as directed by the Company Secretary.
- I raise any suspicions of insider trading to the Company Secretary.

How we make a positive impact

We have set ourselves an ambition to be a world-leading sustainable ultra-luxury automotive business. Our Racing. Green. sustainability strategy is built on five core priority areas: tackling climate change; creating a better environment; investing in people and opportunity; exporting success and delivering the highest standards. As a signatory to the UN Global Compact, Aston Martin is committed to doing business in an ethical and transparent manner, overseen by our Board Sustainability Committee.

> Managing our environmental commitments
> Respecting human rights
> Interacting with local communities
> Handling sponsorships and donations

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Managing our environmental commitments

Our commitments

Environmental sustainability is a core component of our wider business strategy and our efforts to operate as a responsible business. We all have a role to play in both meeting our legal obligations on environmental compliance and reporting and in delivering on our Racing. Green. sustainability strategy, which goes beyond what we are required to do by law. As part of this, we seek to protect and enhance the natural environment, prevent pollution, tackle climate change and continuously improve our environmental performance.

Adopting recognised environmental best practice wherever possible contributes to maintaining a healthy planet for future generations. This involves reducing emissions, energy and water consumption and the volume of waste produced, using low carbon energy and ensuring energy efficiency. It also means maximising our use of sustainable materials, sourcing locally where possible, as well as boosting biodiversity at our facilities and sites. Prioritising the environment in these ways can reduce costs, meet customer needs and influence the environmental practices of our suppliers, customers and other stakeholders.

What does this mean for me?

I reduce my environmental impact at work, including when designing, manufacturing and selling our cars, procuring parts, packaging or machinery, and adhere to the principles of our Environmental Policy. This means that:

- I comply with environmental laws, Company policy, reporting obligations and the terms of any permits relevant to my business area.
- I think about our environmental impact and obligations in the work that I do and I minimise the use of resources such as raw materials, energy and water.
- I prevent contamination of land and water sources. I handle hazardous materials or chemicals carefully.
- I minimise emissions to air by selecting sustainable energy sources, prioritising products low in volatile organic compounds (VOC) and reducing fire risk.
- I minimise waste and support recycling by segregating it.
- I respect biodiversity on our sites by using designated walkways and putting waste into bins provided.
- I immediately report any environmental incidents or near misses.
- I actively identify and implement more sustainable practices in my work area, such as powering down equipment when not in use.

Where can I find out more?

- *Environmental Policy*

Who can I speak to about this?

You can always speak to your line manager but if you need more support, speak to:

- Environmental Team
- Sustainability Team

What should I do in this situation?

I work in one of the Aston Martin manufacturing sites. I notice that recyclable materials are consistently being put in the general waste container, even though clear directions for proper waste disposal are in place.

You should raise your concern with your local managers. Tell your colleagues if you spot them using the wrong bins. We all have a responsibility to minimise our environmental impacts, disposing of waste responsibly contributes to this.

Respecting human rights

Our commitments

Respecting human rights is about recognising the inherent dignity and equal rights of every individual. As an international purchaser of goods and services, we always seek to respect internationally recognised human rights, including the UN Guiding Principles on Business and Human Rights and laws prohibiting forced labour. We promote labour rights both in our operations and supply chain, including the right to just and favourable conditions of work such as fair remuneration and working hours and the right to freedom of association and collective bargaining. We comply with applicable laws on employment conditions and where conflict exists between internationally recognised human rights and national law, we strive to adopt best practice.

We take steps to prevent modern slavery and child labour from taking place anywhere in our own business or in our supply chain. These form part of our wider commitment to source responsibly, aiming to partner with suppliers who uphold strong human rights standards. By integrating human rights into our practices, we can promote fair treatment and safe conditions for you and our contractors, workers across our supply chain, communities and others impacted by our activities.

What does this mean for me?

- I adhere to the principles of our Responsible Procurement Policy and Human Rights Policy to help Aston Martin promote human rights in our own operations and across the supply chain.
- I respect the human rights of others, treating everyone with dignity and respect and being particularly mindful when it comes to those who may be impacted by my activities.
- If relevant to my role, I conduct due diligence on new suppliers to ensure they have systems and controls in place to prevent and mitigate human rights risks, including around forced labour.
- I raise any concerns regarding human rights breaches with my line manager or the relevant team.

Where can I find out more?

- *Responsible Procurement Policy*
- *Human Rights Policy*

Who can I speak to about this?

You can always speak to your line manager but if you need more support, speak to:

- Sustainability Team
- Human Resources Team
- Procurement Business Office

What should I do in this situation?

I ordered some car components from a supplier, but they have not provided the right amount. I quickly need to get hold of more components to meet a production deadline. I have been recommended a supplier by a friend who are extremely quick at delivering items. However, we have not worked with this supplier before and they are manufacturing in a high-risk country with poor labour standards. I do not have time to complete due diligence.

Due diligence should always be conducted before entering into a business relationship. In this case, there are red flags that make this even more critical. We need to check that the supplier has policies and practices in place which respect human rights, both in its own operations and in its supply chain. We may be breaking the law if we don't check, as well as breaching our own ethical standards. Speak to the Procurement Business Office to find out how you can do this or use a supplier who has previously been approved after a proper due diligence process.

Interacting with local communities

Our commitments

Supporting and partnering with local communities helps us build positive relationships and brings mutual benefits. It contributes to the economic wellbeing of surrounding communities, while also enhancing our reputation, operational efficiency and long-term success.

We are committed to respecting the communities and environments in which we operate and understanding our impacts on them. We take all concerns seriously and take action when adverse impacts are identified. We work with various local community groups and contribute to initiatives that reflect community needs. We also partner with local schools and colleges as part of our education outreach programme to promote STEM and careers in the automotive industry. We try to source talent locally where possible by providing a range of job opportunities, including our successful apprenticeship programme.

What does this mean for me?

- I treat local community members with respect.
- I am mindful of how my activities may affect the community and take steps to prevent and mitigate any adverse impacts.
- I report any concerns raised by community members and ensure they are properly recorded and addressed.
- I speak up if I notice any behaviour that goes against our commitment to support local communities.

Who can I speak to about this?

You can always speak to your line manager but if you need more support, speak to:

- Sustainability Team
- Communications Team

What should I do in this situation?

I live close to one of our sites and have heard that members of the local community repeatedly complain about people driving too fast through residential streets. I am not sure whether to raise this because I am not in charge of community engagement.

It is everyone's responsibility to ensure we treat communities with respect and minimise any adverse impacts. You should raise these concerns with the Sustainability Team who will investigate the issue and take appropriate action.

Handling sponsorships and donations

Why this matters

Giving back to the community is part of our culture at Aston Martin. We seek to create a positive social impact through donations and sponsorships in accordance with applicable laws and our internal processes. We work with local, national and international charities to support various good causes, including helping disadvantaged communities to access employment, education and training. By supporting non-governmental organisations and causes aligned with our values, we can make a positive difference. This is part of our commitment to corporate social responsibility (CSR).

Beyond our philanthropic activities, we also engage in commercial sponsorships and licensing to support our brand. These are dealt with by the Aston Martin Partnerships team.

What does this mean for me?

- I am encouraged to engage in fundraising and charity work organised as part of Aston Martin CSR initiatives.
- I seek approval from the Government Affairs & Sustainability team for any corporate sponsorships, donations or charity partnerships. I do not make any donations on behalf of the Company without formal approval.
- I follow our Community Investment Policy relating to sponsorships and donations and ensure we only partner with organisations that share our values and ethical standards.
- I raise any concerns regarding the trustworthiness of a current organisation that we donate to or that we sponsor.

Who can I speak to about this?

You can always speak to your line manager but if you need more support, speak to:

- Sustainability Team



How did we get here?

This Aston Martin Code of Conduct was developed during 2023 by a number of colleagues coming together to look at what the Company values and policies mean in practice for how we all behave. It has been tested with various subject matter experts across the business and in a focus group to ensure that the topics covered align with our policies and to bring the Code to life for everyone at Aston Martin.

We would welcome feedback on the Code. Please email **codeofconduct@astonmartin.com** with any comments or suggestions, or speak to the Company Secretary & Corporate Compliance Officer or the Director of HR & Reward.

We are committed to reviewing and updating the Code periodically but we will update links to policies and guidance documents as and when they change.

Updated as at November 2026



Glossary

Bribery

Bribery is offering, giving or accepting any financial or other advantage or benefit in order to encourage the recipient (or someone else) to carry out their duties improperly, or to reward them for doing so. It can also occur when the recipient of the 'advantage' would be acting improperly simply by accepting the advantage.

An 'advantage' could be money, gifts, loans (of money or other assets), paying fees, providing free services or discounts, hospitality, the award of a contract or anything else of value. The advantage can be a personal or business advantage.

Bullying

Bullying is repeated behaviour which causes harm, fear or distress to another person.

Company assets

Company assets refer to the tangible (physical) and intangible (non-physical) resources, as well as financial resources, owned by a business that have monetary value and contribute to its operations.

Examples of physical assets:
buildings, equipment and machinery

Examples of non-physical assets:
IT systems and intellectual property (IP)

Competition laws

Competition laws aim to promote and maintain fair and competitive markets and prevent anti-competitive behaviours. They prohibit agreements between competitors which prevent, distort or restrict normal competition, such as through price-fixing, market sharing or information exchange. This can include in some circumstances the sharing of technical information or data.

Competitively sensitive information

Competitively sensitive information refers to information that, if disclosed to competitors, could harm a company's competitive advantage or market position. This includes, pricing, marketing strategies, business plans, customer lists, technical developments, significant costs or other confidential business information, including IP.

Confidential information

Confidential information is sensitive data or knowledge that is intended to be kept secret, private or restricted in its distribution. It includes information which could cause substantial harm if released in an uncontrolled manner. Examples include personal data, IP, business plans, engineering designs and financial data.

Conflicts of interest

Conflicts of interests are situations where the personal interests of an employee or someone close to them (family or friends) appear to conflict with Aston Martin's business or financial interests, or where their work for Aston Martin could be perceived to be compromised by their personal circumstances and could influence their independence, integrity and judgement.

Glossary

Corruption

Corruption is the abuse of entrusted power or position for gain. It is a broad term that encompasses bribery but would also include fraud, money laundering, embezzlement, insider trading, extortion and theft, amongst other things.

Discrimination

Direct discrimination is when someone is treated unfairly or less favourably due to specific personal attributes, including age, disability, sex and sexual orientation, gender reassignment, race, religion or belief, marriage and civil partnership, pregnancy and maternity (these characteristics are protected by the law and are called protected characteristics).

Indirect discrimination is when policies and practices that seem neutral disproportionately disadvantage a particular group. At work, this may involve being put at a disadvantage to others due to workplace policies or ways of working that discriminate against those with any of the protected characteristics.

Dual use items

Trade laws aim to control the flow of certain goods, technology, know-how and services from one country to another, in particular, items that have military use. Dual use items are items that could be used for both military and other purposes. The movement of dual use items is restricted and usually requires a licence.

Due diligence

Due diligence is a process to verify information and assess risks associated with a transaction, business relationship or business activity, with the aim of making informed choices. An example is supplier due diligence which involves checking that a supplier with whom we plan to engage with meets our quality, compliance, sustainability and ethical standards.

Export control laws

Export control laws are a type of trade laws which impose prohibitions, restrictions, and / or pre-approval – licensing - requirements on the export of goods, technology and software across national borders.

Fraud

Fraud is any activity that relies on deception, dishonesty, concealment or misrepresentation to achieve an unfair or unlawful gain or to deprive someone of a legal right. Fraud may be committed against the organisation (for example, theft, false expense claims or asset misappropriation) or for the benefit of the organisation (for example, misreporting financial performance, misleading customers or investors or greenwashing).

Gifts and hospitality

A gift is a tangible item of value, any payment, or an advantage given or received without payment. Examples may include flowers, chocolates, a bottle of wine, personal discounts, cash, loans of money or other items, gift vouchers, event tickets, free services or time.

Hospitality is any form of entertaining, meal, function, invitation (such as to dinners, award ceremonies, sporting events, trade association events), including travelling or accommodation provided in connection with such events.

Glossary

Harassment

Harassment is a form of unwelcome behaviour which makes someone feel uncomfortable, degraded, offended, humiliated or threatened on account of protected characteristics. Forms of harassment may include sexual, physical, psychological and verbal harassment.

Sexual harassment is harassment of a sexual nature. Examples of sexual harassment may include sexual comments, remarks or jokes, physical contact and advances, sexual demands and sharing sexually explicit videos, images or messages.

Physical harassment is harassment which involves physical contact or the threat of physical harm. It may include actions such as hitting, pushing or any form of physical violence.

Verbal harassment involves the use of spoken or written language to insult, degrade or threaten someone. This may include slurs and unwelcome comments or jokes, hate speech, name-calling or any other form of verbal communication which creates a hostile environment for the targeted person.

Psychological harassment is a pattern of behaviour which undermines, manipulates or controls a person's mental and emotional wellbeing. It may involve constant criticism, humiliation, intimidation or other actions which cause emotional distress or psychological harm.

Inside Information

Inside information is information about a company that is not publicly available and which, if made public, would be likely to significantly affect the value of company shares or influence investment decisions. Examples of inside information may include but are not limited to: changes in the composition of the Board of Directors, changes in a company's financial performance, major business developments including acquisitions and mergers or significant legal issues.

Intellectual property

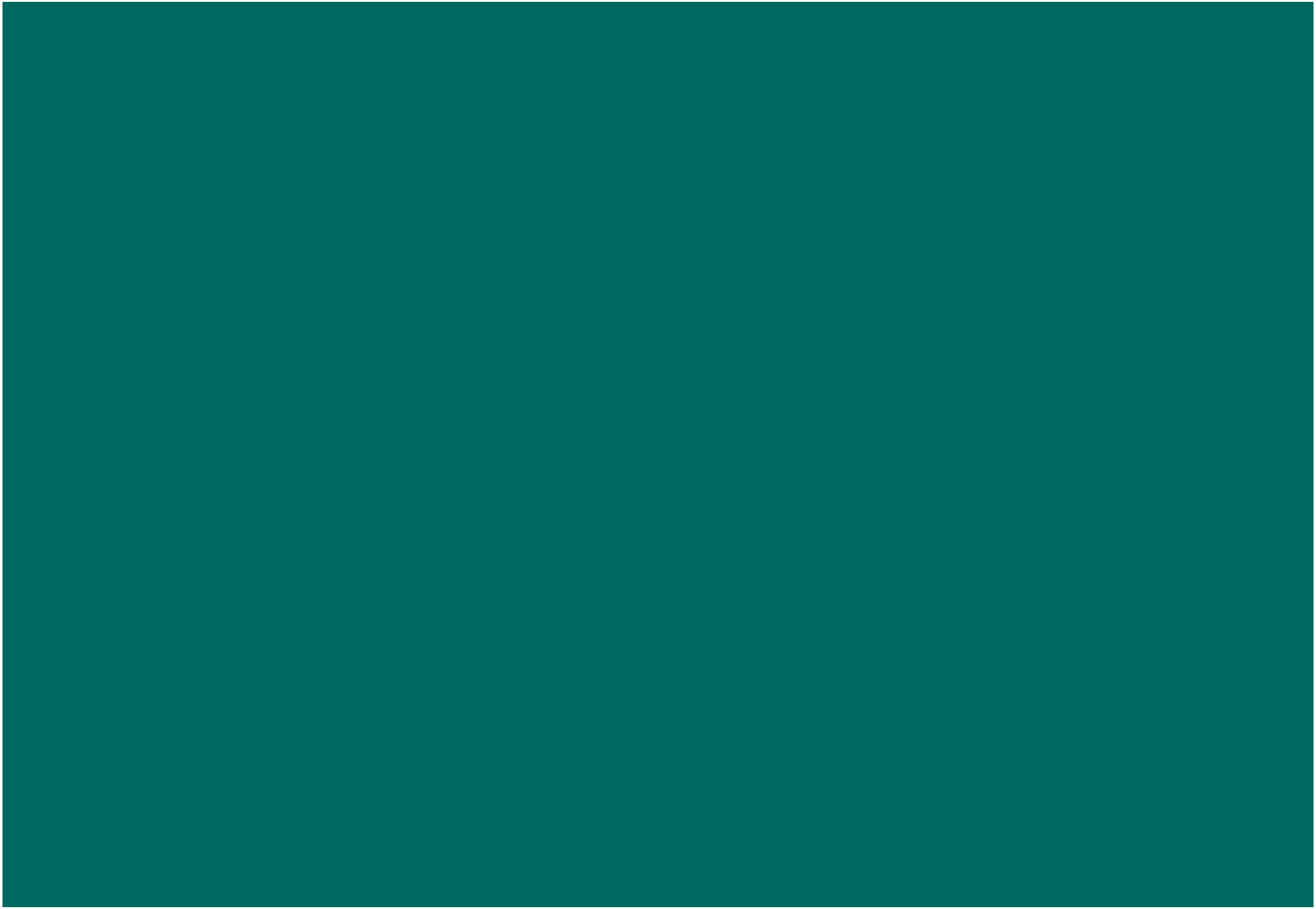
Intellectual property (IP) are legal rights that are granted to individuals or organisations for their creative works or inventions. This may include brands, trademarks, designs, technologies, know-how, trade secrets and other confidential information, domain names, databases, and digital and copyright materials.

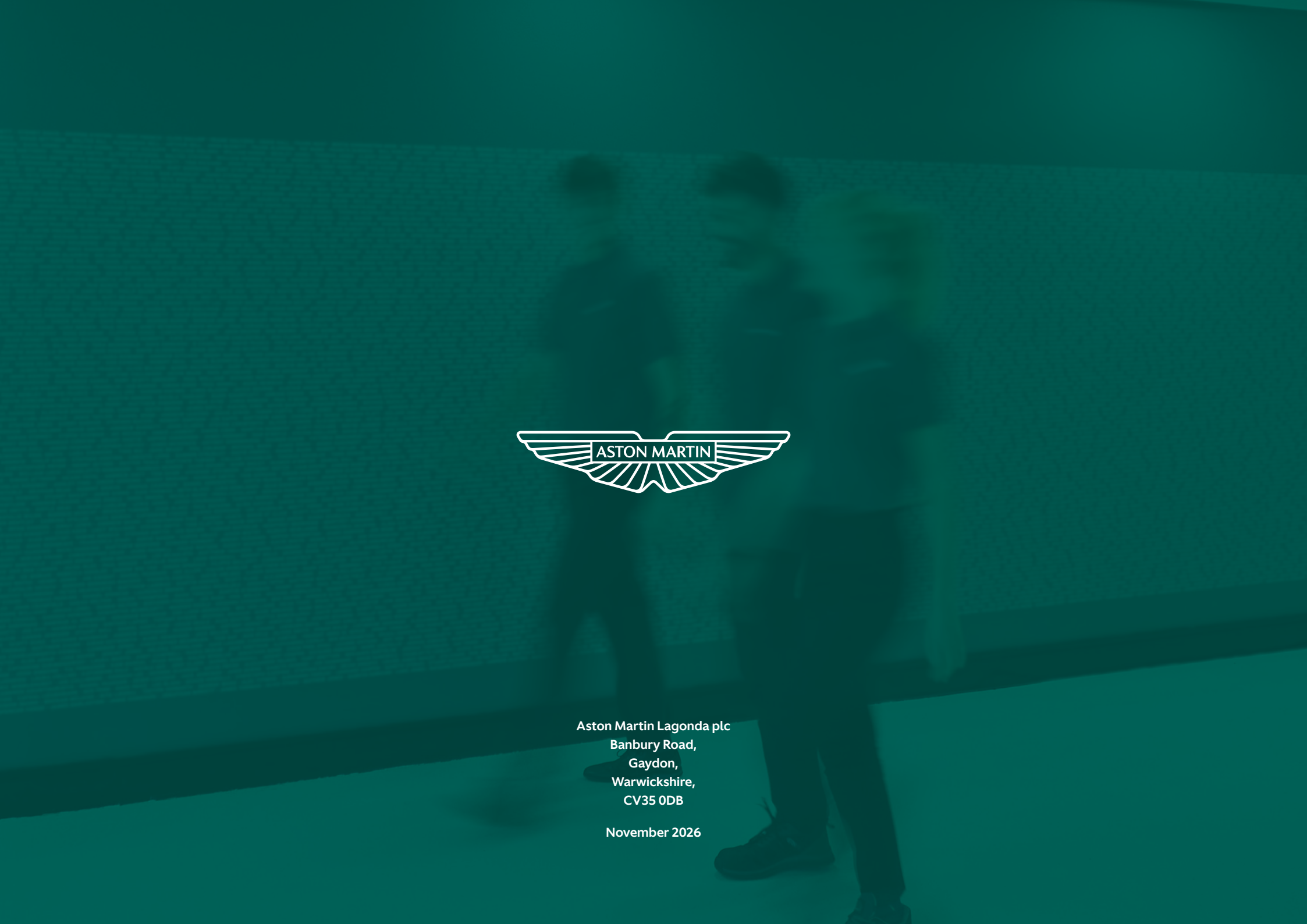
Money laundering

Money laundering is any process whereby funds derived from criminal activity are given the appearance of being legitimate by being exchanged in a business transaction for 'clean' money.

Sanctions

Economic and trade sanctions are restrictions on trade with targeted countries or persons or types of activities. They are used by governments and supra-national bodies as a tool to achieve foreign policy or national security goals. Sanctions can take the form of embargoes of all (or almost all) trade with a particular country, but they can also be more targeted against certain activities / trade or bans on engaging with particular entities or individuals.





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November 2026