

Code of Conduct

Cosworth is committed to maintaining and enhancing our reputation for high performance, quality, reliability, service and value. Cosworth sets the highest standards of business practice in its dealings with all its stakeholders around the world and complying with applicable laws wherever it operates.

Our Stakeholders include:

- Our Directors;
- Our employees, workers and contract staff;
- Customers;
- Suppliers and their employees;
- Investors and their advisors;
- Organisations which represent Cosworth around the world;
- Official national and local government bodies and agencies;
- Local community organisations and political groupings.

Stakeholders may be current and prospective individuals and organisations. We expect all our staff to work within the company's processes, procedures and authority limits, and our Employee Handbook contains its own specific Code of Conduct for staff members.

Some specific policies we have in place that we use to guide our business in its dealings with its stakeholders include:

- Modern Slavery Statement;
- Equality and Diversity Policy;
- Anti-harassment and Bullying Policy;
- Anti-corruption and Bribery Policy;
- Whistleblowing Policy;
- Data Protection Policy.

Our principles (supported by these policies) are:

- We will each contribute to creating an inclusive work environment, where individuals are respected and where the value of having a diverse workforce is recognised. Discrimination in all forms will not be tolerated.
- We have a personal and collective responsibility to maintain a secure and healthy workplace and promote safe working practices.
- We encourage our stakeholders and suppliers to adopt the same or equivalent Code of Conduct standards.
- We are committed to high standards of environmental management.
- We conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.
- We will not make facilitation payments and will seek to eliminate the practice in countries in which we do business.
- We will record all transactions, expenditure, labour charges and all other aspects of the Company's business accurately and in accordance with our policies covering accounting, expenses and record keeping.

- We use Company IT assets appropriately and responsibly. We safeguard Company IT assets in our care from loss, disclosure or misuse.
- We will protect all Company equipment and property in our care from loss, disclosure or misuse. We have the same responsibility for the assets in our care belonging to customers and other third parties.
- We will ensure all personal information is handled appropriately, safeguarding individuals' privacy and following all relevant Company processes and applicable data protection laws and regulations.
- We actively manage access to information by ensuring it is shared only with those who have a legitimate need to know.
- We will declare and seek direction on any issues which may potentially conflict with our responsibilities.
- We will always behave ethically when competing for customers' business and when engaging with customers and suppliers.
- We do not make political payments and we will always be open about our lobbying activities.
- Individuals have a right to participate in political processes but will not use Company time, property or resources to carry out or support personal political activities.
- We have a zero-tolerance on modern slavery and human trafficking and expect our suppliers to be fully compliant with our own values.

Cosworth does not tolerate discrimination against or harassment of any employee (current or former), job applicant, client, customer, supplier and visitor either directly or indirectly on the grounds of:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race, religion or belief
- Sex or sexual orientation

Cosworth aims to eliminate, where reasonably practicable all forms of discrimination and harassment by:

- Providing training in relation to equality and diversity towards both other staff members of Cosworth and all other stakeholders.
- Encouraging all staff members to take an active role against all forms of discrimination and harassment.
- Deterring all staff members from participating in discriminatory behaviour or harassment.
- Demonstrating to all staff members that they can rely upon the Company's support in cases of discrimination or harassment at work.

Cosworth encourages openness and will support its staff members who raise genuine concerns regarding this Code of Conduct, and any stakeholder who makes any independent complaint. If it is suspected there has been a breach of this Code of Conduct or a supporting policy:

- It will be investigated
- Should a breach be found, the individual(s) concerned will be subject to disciplinary action and the company may report the matter to the relevant authorities
- Feedback on the progress of the investigation will be given to the person reporting the concern.



Hal Reisiger
CEO

30th January 2020