

Corporate Social Responsibility

Our Purpose: To transform the way the world buys, sells and owns vehicles

Cox Automotive is the world's largest automotive service organisation, providing a complete set of products and services that are all in one place and easy-to-use for our clients. With solutions that help dealers, manufacturers, fleet companies and leasing firms add value, boost profitability and improve business performance, we are committed to our vision to transform the way the world buys, sells and owns vehicles.

We've always believed that buying, selling and owning vehicles should be easier and more profitable for everyone. Using insight and data from across the wholesale, retail and consumer sectors, our teams work hard to maximise opportunities for every client. We are connecting up our solutions in a way no one else can, to help every Cox Automotive customer make more money, more efficiently.

Cox Automotive UK (CAUK) is committed to not only fulfilling its Legal, Health, Safety and Environmental responsibilities but also to exceeding those responsibilities wherever possible. Our policy applies to all CAUK employees, customers and contractors within all the CAUK divisions.

Protecting the environment

Our company recognises the need to protect the natural environment and believes that keeping our environment clean and unpolluted is a benefit to all. We will therefore strive to follow best practices and drive initiatives such as:

- Minimising waste
- Recycling
- Conserving resources – energy and water
- Organising reforestation excursions
- Using environmentally-friendly technologies

CAUK is committed to continual Improvement in both Health and Safety and the protection of the environment. This will be achieved by the provision of training along with both internal and external audits, and we will set challenging HSE objectives that will help drive continual improvement. This will also include continual improvement of the HSE management system itself. CAUK standards will be made available on the company's website, the company intranet and internal notice boards so that all employees, customers and contractors can view these.

The purpose of this document is to provide our employees and interested third parties with an overview of the minimum standards which CAUK expects from its employees in their internal and external dealings with team members, clients, stakeholders and third parties. CAUK additionally requires its suppliers of products and services, contractors, agency and temporary workers to comply with these minimum standards of conduct and behaviour.

Business Partners and Stakeholders

All CAUK businesses will conduct their operations in accordance with the principles of good governance. We aim to develop strong relationships with our suppliers, stakeholders and others with whom we have dealings, based on mutual trust and respect. CAUK expects its partners to adhere to business principles and code of ethics consistent with its own.

Corporate Governance

CAUK has a well-established framework for corporate governance and has in place:

- An Internal Audit function who report to the Audit Committee
- A Compliance and Risk Function who report to the Compliance and Risk Committee

Compliance with Law

All CAUK team members will comply with the laws and regulations applicable wherever they do business. Policies, procedures and appropriate training will be provided as necessary. CAUK has:

- Established an Anti-Money Laundering Policy and will not facilitate, support, tolerate or condone any form of money laundering.
- Implemented policies and procedures to prevent financial crime and fraud
- Established a Data Protection Policy and procedures and complies with the requirements of GDPR and UK legislation.

Business Integrity

CAUK has implemented a Prevention of Bribery Policy and a Gifts and Hospitality Policy to provide clarity on the standards expected, and how transactions are to be recorded. No employee shall offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain, and no employee may offer, give, seek or receive any gift or payment which is, or could be construed as, such.

In addition to a programme of compliance monitoring, we have in place a Suspicious Activity Reporting procedure, and a Whistleblowing Procedure with a confidential reporting channel.

Conflicts of interest and confidentiality

Employees are expected to avoid personal activities or financial interests, which could conflict with their responsibilities to our business and that of our clients. Our Conflicts of Interest policy sets out CAUK requirements and standards expected.

- Employees and contractors must not seek gain for themselves or others through misuse of their positions or company property.
- All actual and potential conflicts (including those arising from the activities or interests of close relatives or partners) should be disclosed as per company policy.
- Information received by anyone in the course of his or her employment must not be used for personal gain or for any purpose other than that for which it was given.

Employment

Our goal is to make Cox Automotive UK a great place to work for high performing people who are great at what they do, share our values and are motivated to deliver results. CAUK:

- will strive to create a workplace in which there is mutual trust and respect
- will respect the individual's rights, customs and traditions
- will work towards achieving a diverse workforce, recruiting, employing and people only on the basis of objective criteria and the abilities needed for the job to be performed
- will maintain good communications with employees and support them to realise their potential

Equal Opportunities and Diversity

CAUK has implemented an Equal Opportunities and Diversity policy, and requires its employees to undertake training to understand its core principles, which are:

- Commitment to creating and sustaining a positive working environment where everyone is equally valued and treated fairly with respect and dignity all times.
- We do not discriminate against anyone on the basis of age, disability, gender, gender reassignment, marital or civil partnership, pregnancy and maternity, race, colour, nationality, ethnic origin, religion or belief, and sexual orientation. (This is not an exhaustive list.)

CAUK opposes all forms of unlawful and unfair discrimination and no form of intimidation, bullying or harassment will be tolerated. All team members have a personal responsibility for the practical application of this policy in their day-to-day activities and are required to support the policy at all times.

Human Rights

CAUK will adhere to the following principles in respect of our employees.

- We will treat all employees fairly and honestly. All employees will have agreed terms and conditions in accordance with legislation and will be given appropriate skills training.
- We will pay a fair wage reflecting market conditions and will always meet any national minimum wage.
- Working hours shall not be excessive and shall comply with industry guidelines and national standards where they exist.
- We will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child labour and have a zero tolerance to modern slavery.
- Team members have the rights of freedom of association and collective bargaining. We respect the right of our team members to choose whether or not to join a trade union without influence from management.
- We will negotiate in good faith with the properly elected representatives of our employees.
- We will abide by the non-discrimination laws where we operate our business.
- We will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse. We have disciplinary procedures for any member of staff whose conduct falls below the required standard.
- We have formal grievance procedures through which staff can raise personal and work-related issues.

SUPPLIERS - Ethical Purchasing

CAUK has implemented a purchasing policy to ensure that business standards are integrated through our supply chain. We are committed to obtaining and retaining competitive goods and services whilst also ensuring they are from sources which have not jeopardised human rights, safety or the environment. We aim to develop strong relationships with our suppliers, based on mutual trust, understanding and respect and shared ethical values.

We expect our suppliers to adhere to business principles consistent with our own: to ensure that their products and services are produced and delivered to comply with all legislation relevant to their business: and to ensure they adopt and implement acceptable safety, environmental, product quality, labour, human rights, social and legal standards in line with our own code and to ensure these issues are acceptably managed within the supply chain for any products supplied to us.

We will seek to work with our key suppliers to develop long-term meaningful relations and to improve the quality, environmental performance and sustainability of goods and services where this can be achieved to the benefit of both parties. We are committed to developing our supplier diversity programme to accelerate progress and development of supplier inclusion.

Statement on Preventing Human Labour Exploitation (Modern Slavery)

CAUK are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or any part of our business.

Modern slavery is a crime which results in the abhorrent abuse of the human rights of vulnerable workers. The company has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all its business dealings and relationships. We will implement effective systems and controls to ensure that modern slavery and human trafficking are not taking place either within our own business or in any part of our supply chain, in compliance with the Modern Slavery Act 2015.

The company expects the same high standards from its suppliers, contractors and other business partners, and as part of its contracting processes includes specific prohibitions against the use of modern slavery: in turn we expect our suppliers to hold their own supply chains to these high standards.

Community

Our relationships with the local communities where we operate are very important to us and are an essential part of our business. We engage with the community at a range of levels as clients, neighbours, potential team members, businesses and residents.

Volunteering

Our company will encourage its employees to volunteer, through programs organised internally or externally. Our company may sponsor volunteering events from other organisations. Our commitment includes:

- Supporting local community groups and charities through our Foundation, and encouraging employee charitable fund-raising activities
- Improving the environment in and around our operations

Donations and aid

Our company may preserve a budget to make monetary donations. These donations will aim to:

- Advance the arts, education and community events.
- Alleviate those in need.

Our Values

Customer: We think customer and go the extra mile to deliver great service
People: We act with integrity, trust and team work
Innovation: We look to the future and challenge the status quo
Diversity and Inclusion: We treat each other with respect, valuing different points of view and celebrating individual strengths
Community: We make a positive difference in our community by giving back



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Martin Forbes, Chief Executive Officer, Cox Automotive UK