

# Integrity Code



**AMG**  
**PETRONAS**  
FORMULA ONE TEAM

V.001

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## Message From Our CEO & Team Principal

As a Team that aspires to excellence, we've broken records, created iconic machines, and enjoyed unprecedented success with some

of the sport's greatest drivers. Anchored by our Values, we will continue to strive for the very best in all that we do.

While we're proud of our achievements, we will never succumb to complacency, and recognise that past performance is no guarantee of future success. When we compete in the uncompromising environment of Formula One, we do so with trust and respect for each other and our competitors, upholding the value of fairness in competition.

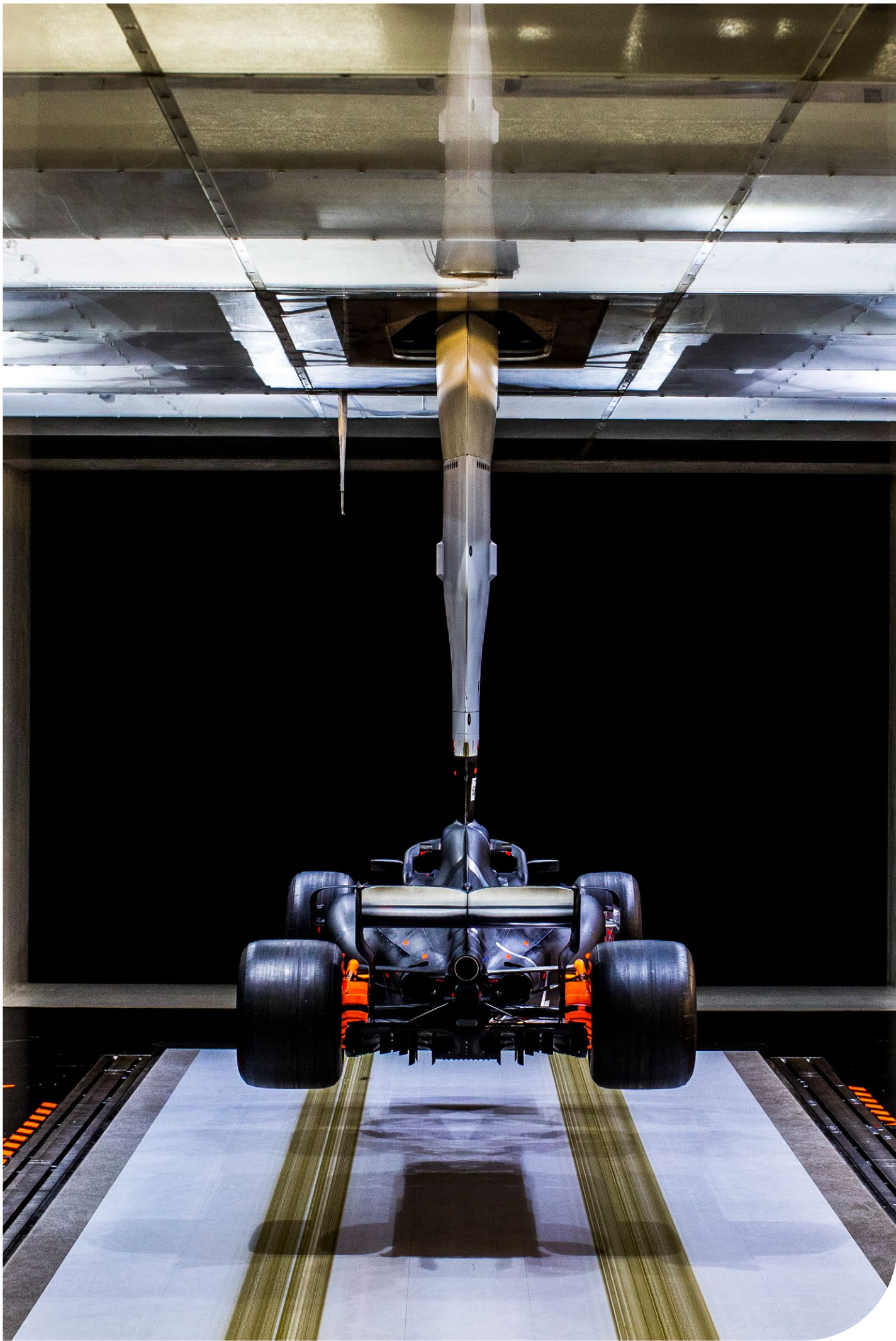
We believe and invest in our greatest asset: our people. No matter which area of the Team you work in, you determine how we perform both on and off the track. Whilst we are all responsible for delivering our own 'tenth of a second', each one of us is also responsible for making the right decisions and conducting ourselves in a way that is guided by our Values.

This Code operates in conjunction with our wider Governance, Ethics and Compliance framework and seeks to protect not only the business and its reputation across the globe, but every one of us as we go about our work.

We believe that the commitments set out in this Code, including in relation to equality, diversity and inclusion, respect for human rights, environmental protection and good governance are inherently linked to reducing risk and ultimately to high performance and success.

Toto Wolff





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# About Our Integrity Code

This Integrity Code has been developed by us, for us at Mercedes-Benz Grand Prix Limited. (“MGP”). The Code is not intended to give you the answer to every question. Rather, it sets out our minimum expectations for all colleagues, regardless of where we are based. It provides guidance on key risk areas that may arise and who to contact if we need help or more information. It describes the decision-making principles and behaviours that we expect as a company when dealing with each other and our stakeholders, including practical examples which illustrate the application of key topic areas.

In addition to the laws and regulations which apply to our business, we have developed and implemented, as part of the Governance, Ethics and Compliance framework (“GEC framework”), internal policies, procedures, instructions and guidelines which govern the day-to-day activities of our people. You should refer to the broader GEC framework for further information and detail in relation to the topics addressed in this Code and generally.

Beyond the law and our policies, we must always be guided by our Values and principles. They ensure that we do the right thing, often going further than the letter of the law and our policies. Acting with integrity is embedded in our culture.





# 01. Our Values

Our Values reflect how we do business and conduct ourselves. They define our aspirations and are the drivers in building a global, collective sense of identity.

01. Passion	01. Passion We love what we do, we share high energy and drive and celebrate our achievements. We have an optimistic, can-do outlook that motivates us to perform at our best every day, on and off the track. We do it for our families, for each other, for our stakeholders and for our fans.  Passion is not showing high or uncontrolled emotion on the job that can have a distracting or negative impact on the performance of Team members.	02. Respect Our good reputation is our most valuable asset and we work to enhance it. We listen, we challenge openly and constructively and we give credit where it is due. We prize humility, teamwork and safety as we commit to delivering the best team result. Trust, integrity and sporting spirit are integral to our success.  Showing respect is not shying away from giving and receiving constructive challenge where it is beneficial to the Team, even if you are not the subject matter expert.
02. Respect		
03. Innovation		
04. Determination		
05. Excellence		

03. Innovation With a pioneering spirit, we strive to be creative in our thinking and to approach new ideas with an open mind. We are not afraid to take calculated risks and we learn and grow from our setbacks. We must constantly innovate to stay ahead of the competition.  Being innovative does not mean making decisions or taking action with no consideration of the potential risks or without following the appropriate channels.	04. Determination We never back off and we keep a level head when the pressure is on. We share the workload and we take ownership of our tasks to deliver the best possible results. Winning in Formula One is a massive challenge and we must never give up in pursuit of our Team intent.  Having determination does not mean pursuing a task or idea without due analysis of its impact.	05. Excellence We always aim to raise our standards and to set the benchmark within our sport, striving to exceed our own objectives. We must never be satisfied with second best.  Striving for excellence doesn't mean that mistakes will never be made. Setbacks are expected and should be learned from.
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# 02. Who Does This Apply To?

Each of us plays a role in maintaining the company's reputation, and together we create, protect and enhance our culture.

This Code applies to all employees, directors and officers, as well as contractors under our direct supervision.

We also expect those who perform services for or on behalf of us (such as consultants, agents and suppliers), and encourage our partners, to apply or adopt principles and policies that are consistent with this Code.

# 03. Our Commitment

As an organisation, we are committed to achieving our goals in an open, honest, ethical and lawful way. Whilst we recognise that it is not possible to eliminate risk altogether, we apply the following principles in seeking to manage the range of different types of risk that arise across our business and operations:

- We implement proportionate and risk-based policies and procedures.
- We promote appropriate and positive top-level commitment and leadership.
- We assess risk and operate in a risk-aware manner, including through the conduct of due diligence.

- We hold everyone to the same standards and behaviour, regardless of their position within the organisation.
- We provide communication, training, resources and support to guide the organisation and our people.
- We monitor, review and improve our procedures in order to remain compliant with applicable laws, regulations and best practice.
- We promote a culture where people feel comfortable to ask questions and, where necessary, to SpeakUp! and raise concerns without fear of retaliation.

Further Information

- [Risk Management Policy](#)





# 04. Our Responsibilities

As individuals, we all have a responsibility to do the right thing, no matter where we are in the world and no matter the circumstances.



**As colleagues we:**

- Make sure we are familiar with the Code and know how to access it;
- Follow the law and our policies and know how the Code applies to our role;
- Use our resources carefully and sustainably because of our social and environmental responsibility and out of respect for our shareholders;
- Attend training on Code-related issues;
- Use our Values to help us make good decisions and do the right thing;
- Speak up if we think or suspect the Code, our policies or the law have been breached in any way;
- Ask questions if we are ever unsure.

**As managers we:**

- Understand the Code and are able to communicate its key messages;
- Act ethically and responsibly to set a strong example to all colleagues;
- Ensure all new starters are trained on the Code and understand it;
- Act promptly and effectively if a colleague tells us they think or suspect the Code, our policies or the law has been breached in any way.







# 05. Speaking Openly

We are committed to open communication and encourage you to ask for help if you are not sure what to do in any given situation. You must report any suspected or actual breaches of this Code, our policies, or the law.

- Your manager is the person you should speak to first (unless you think they are themselves in breach).
- If you cannot speak to your manager, you should raise concerns about possible breaches with Human Resources, or the Legal & Compliance Team.
- In addition, our SpeakUp! whistleblowing platform is available to employees, contractors and external parties.

Key principles to be aware of:

- **Confidentiality:** We treat all reports of suspected violations or breaches confidentially and will share the information only with those who 'need to know' to investigate and properly resolve the issue.
- **Anonymity:** It is open to individuals to report matters anonymously via our SpeakUp! platform.
- **Action:** We will quickly investigate all reports and take necessary action, including disciplinary action when appropriate. We will keep you informed of the receipt and progress of your report.
- **Retaliation:** We have a zero-tolerance policy on retaliation against employees for reporting suspected breaches or violations or co-operating with inquiries in good faith. Any incident of retaliation should be reported to the Legal & Compliance Team as soon as possible.

As long as you're acting in good faith and your concerns are genuine, you are legally protected from victimisation and will not be at risk of any form of retribution, including losing your job, as a consequence of raising a concern – even if you are mistaken.

Further Information

- [Whistleblowing Policy](#)





# 06. Accountability

The consequences of breaching this Code or associated documents under the GEC framework are potentially significant, both for the company and individuals.



Potential consequences:

- Irreparable reputational damage
- Financial damage
- Litigation
- Regulatory and criminal investigations
- Disqualification of directors
- Fines
- Imprisonment of individuals

We take breaches of the Code and associated documents seriously. Anyone who is found to be responsible for inappropriate conduct (including retaliation) will be subject to disciplinary sanctions in accordance with our disciplinary procedures. Depending on the severity of the breach, consequences may range from a warning to termination of employment.

For the avoidance of doubt, situations that can lead to disciplinary action include:

- Violating our Code and associated documents
- Asking others to violate our Code and associated documents
- Failing to report a known or suspected violation of our Code and associated documents (subject to mandatory provisions of applicable law)
- Knowingly reporting a false allegation of a violation of our Code and/or associated documents
- Failing to co-operate honestly and openly with an investigation of a possible breach or violation
- Retaliating against anyone who makes a report of a possible violation of our Code and associated documents





# Acting With Integrity

## 02.





# Acting With Integrity

You may be confronted with complex situations involving ethical issues and value judgements. When making decisions, you should be mindful of the following:

- **The Law:** We must always follow the law.
- **Policies & Frameworks:** Following our policies and procedures provide a protective layer of procedure, training and support.
- **Our Values:** We must always do the right thing for our colleagues, stakeholders and communities by going further than just complying with the law and our policies.

If you are unsure how to resolve a situation, ask yourself these questions:

- Are the actions legal?
- Are the actions consistent with our Code and policies and procedures?
- Are the actions consistent with our core Values?
- Do the actions set a good example?
- Would I be comfortable talking about the actions with my colleagues, family, and friends?
- Have I asked for advice from others who have knowledge of the topic so I can make an informed decision?

If the answer to any of these questions is “no” a violation of our Code or associated documents may have occurred, and you have a responsibility to report it.





# Our Business Relationships

Our business relationships and associations present opportunities as well as risks. We aspire to develop business relationships with like-minded customers, subcontractors, suppliers, and partners who are guided by a similar set of principles of ethical and responsible conduct.

This Code should be shared and discussed with our customers, suppliers and partners to better explain our expectations and reinforce our culture of accountability.

Before entering into a business relationship, we conduct a know your counterparty (“KYC”) procedure as well as risk-based due diligence. However, our responsibilities do not end at that stage. We carry out ongoing monitoring of our relationships and periodically require confirmation of continued compliance with applicable laws from our third parties. We also carry out renewed and additional due diligence, including on an event driven basis.

We are all responsible for bringing concerns in relation to third parties to the attention of the Legal & Compliance Team as soon as they arise.

**Q**  
We need to get a contract across the line urgently. Can we sign the contract and just complete the risk-based due diligence in the coming weeks?

**A**  
No, on-boarding, KYC procedures and due diligence all need to have been completed prior to the signing and/or performance of any contractual arrangement.



- Further Information
- [Due Diligence Policy](#)
  - [Risk Management Policy](#)

# Anti-Bribery & Corruption

Bribery is illegal in all the countries in which we operate. It damages markets and communities and transfers resources into the wrong hands. Our position on bribery and corruption is clear. We do not engage in corruption and we never request, pay, authorise or accept bribes or facilitation payments, regardless of local custom or practice.

Failure to address the risk of bribery and corruption could undermine our reputation and lead to investigations, fines and other penalties for the individual involved and the business.

We build relationships based on trust and a mutual understanding that corrupt behaviour in our business transactions will not be tolerated. We expect people that work with us to share our commitment.

The UK has some of the strictest bribery laws in the world and they apply to everyone who works for us, including agents and contractors. UK citizens can be prosecuted for acts of bribery committed abroad.

We have implemented a number of controls and procedures to mitigate the risk of bribery and corruption, including by persons associated with us.

**Q**  
A piece of equipment has been seized by customs in an airport. A consultant of ours has requested a payment which will be used to “help expedite” the recovery. Is this acceptable?

**A**  
No. Without understanding exactly what the payment is for, we may be at risk of facilitating the payment of a bribe. We, and anyone acting on our behalf, should never offer a bribe. You should advise the Legal & Compliance Team immediately.

**Q**  
A supplier of ours has offered me a kick-back (portion of the contract fee) if I ensure their contract is renewed for another two years. It looks like we would have renewed with them anyway, can I accept their offer?

**A**  
No, this would be classed as acceptance of a bribe as the supplier intended to obtain an advantage as a result of their offer.

- Further Information
- [Anti-Bribery & Corruption Policy](#)
  - [Expenses Policy](#)



# Gifts & Hospitality

We recognise that gifts and hospitality are an important part of the industry in which we operate and may be necessary in order to build or reinforce business relationships. The proper management of the giving and acceptance of gifts and hospitality is key to avoiding the risk of actual or perceived improper influence and/or any obligation to act in a particular way.

**Gifts and hospitality and promotional expenses may only be given, accepted or incurred where:**

- They are in good faith, occasional, reasonable and appropriate;
- They are recorded and approved where necessary;
- There is no intent or prospect of influencing decision-making or other conduct;
- There is no intent of obtaining any improper or undue advantage;
- They are not in the form of cash (or equivalent).

We require all of our people and our agents to follow the procedures for registering and obtaining approval for gifts, hospitality and promotional expenses.

**Q**

I received a £100 store gift card from a supplier at Christmas as a token of appreciation for our work together over the past year. Can I keep it?

**A**

No, you can't accept a gift card or cash equivalents, no matter the value. You should politely decline / return the gift card and explain to the supplier or partner that it's a breach of company policy to accept cash or cash equivalents.

**Q**

Is it okay for me to send a gift or hospitality invitation to a supplier and ask for them to provide me with an invitation to an event I really want to attend?

**A**

No, you shouldn't use company assets for your own personal gain. Further, you should never request a gift from a third party or give a gift where it has been requested by a third party.

**Q**

I've been invited to dinner by one of our partners. She has asked me to join her and her team to celebrate the success of a recent event. Can I attend and do I need to tell anyone?

**A**

Yes, you can attend, provided it is appropriate in the circumstances. You should ensure you follow the procedures for registering and obtaining approval for gifts, hospitality and promotional expenses.

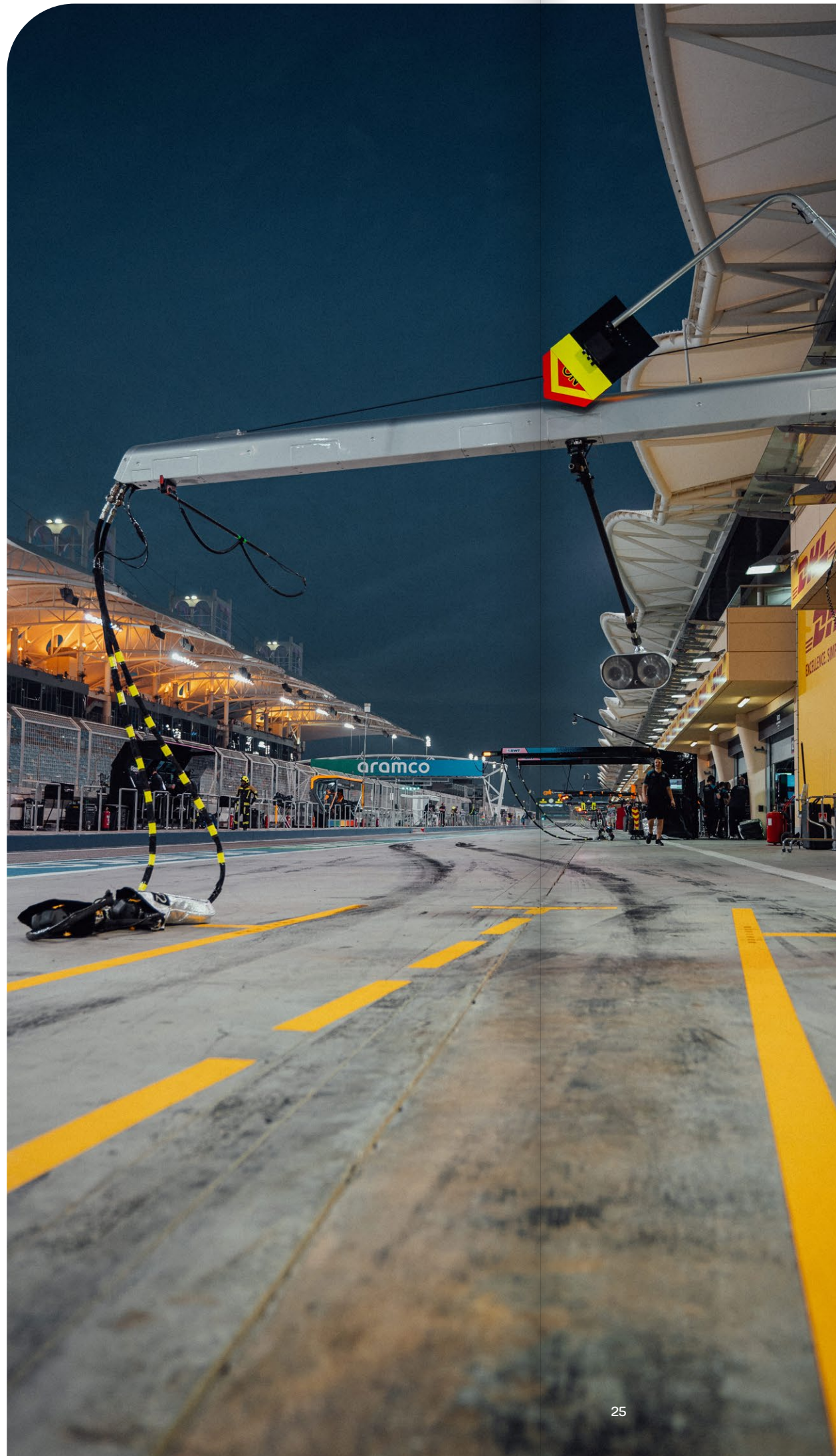
## Further Information

- [Gifts & Hospitality Policy](#)
- [Expenses Policy](#)





# Anti-Money Laundering & Terrorist Financing



Money laundering is the process by which proceeds of crime are processed through the financial system in an effort to disguise their illegal origin. Terrorist financing involves the provision, collection or receipt of funds with the intention or knowledge that they may be used to support terrorist acts or organisations.

We encounter many people and entities across the world as part of our business. It is possible that some people and entities may want to use our business in these illegal ways. To manage this risk, we implement a number of controls and processes, including conducting risk-based due diligence to ensure we know who we're doing business with and to identify where funds are coming from.

There are severe penalties (including imprisonment) for companies and individuals involved in money laundering, terrorist financing and other financial crime.

Our procedures are designed to detect 'red flags', but you should not hesitate to contact the Legal & Compliance Team immediately and at an early stage if any red flags become apparent to you.

#### Example red flags:

- Unclear source of funds
- Large up-front payments that we have not asked for
- A bank account held in a name that does not match the person / company we're working with
- A bank account located in a country that has no connection to the person/company we are working with
- Difficulty identifying the owner of the company
- Adverse news in relation to any of the individuals connected to the entity
- Request to change bank accounts multiple times or to a high-risk jurisdiction
- Any payment or financial requests that seem unusual

#### Further Information

- [Anti-Money Laundering & Terrorist Financing Policy](#)
- [Due Diligence Policy](#)
- [Tax & Anti-Facilitation of Tax Evasion Policy](#)





# Sanctions & Export Controls

Governments adopt sanctions and export controls for national security and foreign policy reasons. These laws prohibit conducting business with sanctioned individuals and entities or transferring certain goods, technology or services to certain individuals, entities or countries without a licence.

The global nature of our business means our activities may be subject to sanctions or export controls imposed by multiple government authorities, notably those of the UK, the EU and the US. We are committed to complying with all sanctions and export control laws applicable to our business activities. We do not participate in transactions or engage in conduct designed or intended to evade or facilitate a breach of such laws.

Violations may undermine our reputation and incur substantial fines for the company, and potential fines and/or imprisonment for individuals. To manage our risk exposure and ensure compliance, we implement controls and processes, including sanctions screening.

**Q**

We are creating a new eCommerce platform where we will look to sell our products globally. Do I need to be aware of sanctions?

**A**

Yes, we are unable to sell into certain territories if they are subject to broad sanctions regimes. Please contact the Legal & Compliance Team who will advise you on which territories we are allowed to sell into.

## Further Information

- [Sanctions & Export Controls Policy](#)
- [Due Diligence Policy](#)

# Competition Law

We are committed to fair competition both on and off the track. Legislation exists to promote free, undistorted competition between companies, protecting independent decision-making of market participants, and preventing the misuse of market power. We comply with all relevant competition laws and seek to conduct our business on the basis of fair and open competition.

We all have a responsibility to ensure that we do not become involved in anti-competitive behaviour. There are significant penalties for companies and individuals that breach relevant legislation. Investigations arising from suspected breaches of competition laws are disruptive and costly for the business and can damage the trust that our customers, partners and stakeholders place in us.

## Further Information

- [Competition Law Policy](#)





# Conflicts of Interest

A conflict of interest can arise in any situation where your own personal position could compromise your judgement or might influence you to act in a way that is not in the best interests of the company, its employees or customers.

We try to avoid conflicts wherever possible. Even where there is no ill intention, the appearance of conflicting interests can damage our reputation and image. We should never put our individual interests ahead of those of the business, even if it appears that the decisions may be beneficial for everyone. We all have a duty to declare conflicts promptly when they arise.

**Examples of potential conflicts of interest include:**

- Acting as a consultant, employee, director, officer or manager for another company or organisation where the outside activity or employment will conflict with the performance of our role and duties, or could affect our objectivity
- Holding (including via a close family member) a material shareholding in a customer, competitor or supplier
- Managing a supplier relationship with a company in which a family member, friend or partner has a financial, business or employment involvement
- Recruiting a family member, partner, friend, or former colleague
- Offering a secondment or internship or similar to a relative or close friend of a customer or government official

If you feel that your ability to make a decision on behalf of the company is impaired because of any external factors, you should report and discuss the matter with the Legal & Compliance Team.

**Q**

We are in the process of finding a new supplier for office stationery. My friend is a director at the company that has submitted the best proposal. My decision hasn't been affected by this, so do I really need to disclose the potential conflict?

**A**

Yes, you should immediately disclose this conflict and follow the procedure as set out in our Conflicts of Interest Policy before proceeding with any selection process.

**Further Information**

- [Conflicts of Interest Policy](#)

# Inside Information

Although we are not a listed company, we understand the importance of protecting our business, our shareholders and the financial markets from the improper use of inside information.

Inside information is information that has not been made public and may be share price sensitive. It is illegal to use inside information for your own benefit, or on behalf of others. Insider trading is a criminal offence in the UK and many other countries we operate in. In the course of work, you may become aware of inside information, including in relation to a company we do business with.

**What does this mean for you?**

- You must not disclose confidential information to anyone else unless you are authorised to do so.
- You must not deal in the securities of any company while you are in possession of inside information about that company.
- You must not engage in market abuse by spreading false information or engaging in other activities designed to manipulate the price of a company's securities.

**Q**

I've just been told that one of our business partners (a listed company) is about to announce a large acquisition that will likely positively impact their share price. Can I suggest that a family member buys shares in the company based on this information?

**A**

No, not only would this violate your confidentiality obligations to us, but you could be charged with illegal insider trading.





# Anti-Fraud

Fraud is a serious crime that has the potential to harm our business and has serious legal consequences. The term fraud is commonly used to describe theft through a wide variety of dishonest behaviours such as, deception, forgery, lying and concealment of material facts.

We do not engage in fraudulent behaviour and we do not knowingly assist or facilitate any third party to commit fraud. Fraud may occur in many different parts of our business. The following are examples of activities that may constitute fraud:

- Destroying, manipulating, altering or forging company records
- Manipulating financial accounting records
- Knowingly creating false contracts which do not reflect the true nature of the contractual relationship
- Backdating contracts to misrepresent the signature date
- Falsifying or duplicating expense claims
- Deliberately misrepresenting, concealing, understating or overstating material facts relevant to a decision or transaction

We comply with the provisions of tax and customs laws, which include regulations on corporate tax, income tax and value-added tax, as well as the customs duties and excise tax to be paid on imports of goods. Correct and timely declaration of taxes and duties is one of our basic principles.

We all have a responsibility to remain alert to any unusual or suspicious arrangements which could expose us to the risk of fraud.

Q

Last month I purchased a train ticket to London for a meeting with a potential partner on my personal card. I submitted a travel expense claim and the company has reimbursed me. Last week, the potential partner cancelled. I managed to cancel the train ticket and get a full refund. Do I need to inform the company so I can return the amount they reimbursed me?

A

Yes, if you don't this would be an improper claim for expenses. We expect our employees to behave openly, honestly and in the best interests of the company at all times.

Further Information

- [Anti-Fraud Policy](#)
- [Expenses Policy](#)
- [Tax & Anti-Facilitation of Tax Evasion Policy](#)

# Political Engagement

We observe strict political, religious and philosophical neutrality as far as possible. As a result, we avoid making financial contributions to political candidates, elected representatives, political parties, or religious institutions. At the same time, we respect the personal political affiliations of our employees as long as they do not affect the activities, image or political neutrality of the company.

As part of doing business, we engage with governments, regulators, public interest groups, industry associations and other similar bodies around the world. If we consider there is a legitimate reason and/or business objective for engaging with the political process, we ensure any such engagement is responsible, transparent and ethical. We do not seek to influence the political process by improper or corrupt means.

Further Information

- [Political Engagement Policy](#)





# Environmental and Social Responsibility

## 03.

■■ Motor racing is fuelled by passion. We operate in the fastest, most dynamic sport in the world and we have a responsibility to use that global platform to be more than leaders; we want to be pioneers. Over the past few years, we have worked tirelessly to change and better understand the impact we have on the world. We're fully committed to sustainable high-performance. This is the future for us all. ■■

■■ Whether deploying our resources to drive technological advances that will help society address the environmental challenges that we face, or committing to increase the diversity of our workforce, and supporting our communities, our passion isn't just in the cars you see on track, it's across everything we do. ■■

— Toto Wolff





# Environmental Responsibility

We are fully committed to sustainable high performance and have a framework of objectives to minimise the environmental impact of our business activities and maintain our resilience to environmental risks. We continue to work tirelessly to better understand the impact we have on the world and to use our global platform to drive our team, and wider industry, to be at the cutting-edge of sustainable technology.

A failure to effectively manage environmental impact not only has the potential to cause harm to our environment, our employees, our associated persons and the communities in which we operate, but may also lead to a range of financial, legal and reputational consequences for the company and our people.

We have a strategic ambition to be the world's most sustainable professional sports team and as part of our commitment, we:

- Meet, and where possible exceed, the obligations as set out in applicable environmental laws, and regulatory requirements;
- Consider environmental sustainability in all of our operational and business decisions and improve our management systems to enhance environmental performance;
- Educate, train and motivate our employees to ensure that we can all play our part in advancing an environmentally responsible culture within our organisation;

- Support innovation and research programmes to improve energy efficiency, reduce carbon emissions and improve the resilience of our global assets to climate-related impacts;
- Provide Board-level oversight and review our environmental practices, performance and associated policies regularly;
- Allocate sufficient resource to ensure effective direction and implementation.

Our targets will be set using the UN Sustainable Development Goals as a framework for impactful activity, addressing global and societal needs.

## Further Information

- [Environmental Policy](#)

# Human Rights & Modern Slavery

We believe it's our responsibility to respect and uphold the human rights of our people and any other individuals we are in contact with, either directly or indirectly. We expect those we do business with to share our commitment, and we seek to use our platform to drive positive change and advance human rights.

Unfortunately, human rights abuses and modern slavery take place across the world. As a business, we have implemented a number of controls to address these risks. The following principles guide our approach:

- We believe that everyone is entitled to basic rights and freedoms, whoever they are and wherever they live.
- We work to avoid causing or contributing to adverse human rights impacts through our own activities, and address such impacts if they do occur in a timely and appropriate manner.
- We seek to prevent or mitigate adverse human rights impacts that are directly related to our operations, products and services through our business relationships.
- We respect human rights by making due diligence part of our business processes.
- If we identify that we have caused or contributed to adverse human rights impacts, we provide for or co-operate in their remediation through legitimate processes.
- We continue to look for ways to support the promotion of human rights within our operations and our sphere of influence.

**Q**  
I recently saw some adverse news regarding one of our suppliers and allegations relating to child labour. Do I need to report this to anyone?

**A**  
Yes, we are committed to respecting all applicable laws and any illegal or forced labour practices by our suppliers or any other third parties we do business with is strictly prohibited. We encourage you to speak up if you suspect a breach of our Code or any associated policies. You should inform the Legal & Compliance Team immediately.

## Further Information

- [Human Rights Policy](#)
- [Modern Slavery Statement](#)
- [Human Rights Statement](#)





# Equality, Diversity & Inclusion

Equality, Diversity & Inclusion (“EDI”) are core priorities. We recognise that embedding EDI in all that we do leads to enhanced innovation, productivity and performance and a reduction of risk. We believe a more diverse and inclusive team will not only make us faster on the track, but also inspire others to set ambitious targets in this area. We value the contribution made by every colleague, irrespective of age, sex, disability, sexual orientation, race, colour, religion, ethnic origin or political belief.

We are committed to attracting, recruiting, retaining, fostering and developing diverse talent. We respect and value every employee and aspire to maintain a fair and supportive working environment where everyone can flourish and fulfil their potential.



## Further Information

- [EDI Framework](#)

# Charity & Community

As part of our aim to have a positive impact in our communities and industry, we are committed to using our Team’s resources for the benefit of those in need and to share the passion for motorsport that we all thrive on.

Social donations and contributions are gifts given for a charitable purpose or to support a particular cause. A donation or charitable contribution can be monetary or in the form of services, and new or used goods. They also include emergency or humanitarian aid, development aid support, and medical care assistance.

## As part of our commitment, we:

- Engage with the communities in which we operate through sponsorship, donations and outreach programmes;
- Anticipate and minimise potential disruptions to the community through our activities;
- Contribute to education and employment growth by providing access to our resources, fostering training and transfer of skills and technology;
- Respect cultures and are aware of local practices and traditions, legislation, and cultural factors that may impact behaviours and decisions;

We implement internal controls to ensure that our donations and contributions are appropriate and do not create a real or perceived conflict of interest or improper advantage.

## Further Information

- [Anti-Bribery & Corruption Policy](#)







# Protecting Our People, Assets and Information 4.





# Dignity at Work

Our people are fundamental to our success. We treat each other fairly and with respect and look out for our own and one another’s physical and mental well-being.

We all have a responsibility to exercise good judgement in professional and personal relationships with colleagues and to create a working environment that is collaborative, respectful, fair and tolerant so that we can achieve our full potential at work.

We should be sensitive to actions or behaviours that may be acceptable in one culture but not in another. Equally, behaviour that is acceptable to one person may not be acceptable to another. It is our responsibility to be aware of how our own behaviour may affect others.

Colleagues found to have engaged in unacceptable behaviour can face serious consequences, such as disciplinary action, including dismissal, and potentially legal action.

**As part of our commitment, we:**

- Create a welcoming and inclusive work environment, and encourage those we work with to do so by treating everyone as we would like to be treated;
- Don't engage in behaviour that would be considered by anyone in the Team as creating a hostile or intimidating work environment, including making inappropriate jokes or comments;

- Don't spread malicious rumours or gossip that might be considered derogatory, defamatory, harassing, or otherwise offensive;
- Make sure that we conduct ourselves appropriately when we are at off-site events including Company-organised events and social events such as Christmas parties, team events and social outings;
- Listen, motivate, and support others to achieve common objectives;
- Share our achievements and failures.

If you feel that either you or anyone else is being mistreated, you should report it immediately. Please see Speaking Openly.

**Q**

Our department has one Manager that loses his temper and is sometimes harsh in interactions with employees. I am not sure if I should report this. Will the company address this kind of behaviour or look the other way?

**A**

Yes, you should raise this concern to Human Resources. We all have a responsibility to act professionally and treat each other with dignity and respect.

**Further Information**

- [EDI Framework](#)

# Health & Safety

We believe a safe and healthy work environment is a basic human right. We work hard to ensure that employees and contractors know how to identify and manage risks, and take personal responsibility for their own safety and the safety of those around them (whether at the factory, trackside or travelling as part of their job). We expect those with whom we do business to do the same.

As well as the personal impact that an injury can have on the lives of individuals and others close to them, the disruption to the business caused through absence and costs from investigation, medical treatment and compensation can be substantial. Failure to deliver on our responsibilities can damage our reputation and the trust our colleagues and customers have in us.

The applicable legal, regulatory and other requirements are considered a minimum obligation. We are committed to going beyond what is legally necessary to better prevent workplace illness and injury and to ensure optimum mental and physical health and well-being within the workplace.

You must understand and follow safety instructions and guidance and the Health & Safety policies and procedures that apply to your role.

If you see something that you think is unsafe or could cause an accident, See it, Say it, Fix it, and report this via our safety management system.

**Further Information**

- [Health & Safety Policy](#)





# Security

We are committed to providing our people with the most secure working environment possible. As part of this commitment:

- We follow the applicable laws and regulations regarding security in all the locations where we conduct business.
- We issue regular instructions to keep employees aware of the local threats and the applicable rules.
- We implement procedures to mitigate security risks and to react in the event of a security incident.

All employees have a responsibility to stay informed of the current instructions, to apply them and promptly report any security incident to the nearest available manager.



Further Information

- [Health & Safety Policy](#)





# Data Protection & Information Security

## Information Security

Information security seeks to preserve the confidentiality, integrity, and availability of information to reduce the risk and the impact of potential threats to our business and operations.

Protection of our know-how is crucial to preserving our business and competitiveness on a daily basis. Information security aims to protect this know-how and reduce the risk of IT disruptions.

### What should you do?

- Always keep your passwords secret and don't share them with colleagues or others.
- Lock your screen and any tablet devices when you leave your desk.
- Keep your mobile equipment safe and take particular care in public places.
- Don't access inappropriate material using company IT or equipment or while you are at work.
- Don't disclose information unless it is appropriate and safe to do so.
- Don't use public file sharing websites.
- Don't use personal email accounts for work matters.
- Keep information organised, identifiable and accessible.
- Manage sensitive data with care.

### Further Information

- [Data Protection & Information Security Policy](#)

## Confidential Information

During the normal course of your work, you may have access to confidential information or proprietary data relating to our business activities.

Confidential information can include: business results, financial data, forecasts, human resources and personal data.

Proprietary data includes: business strategy, technical information, product improvements, trade secrets, or other know-how developed or acquired by us.

Access to confidential information or proprietary data is restricted to employees whose function specifically requires the use and handling of this data and should be safeguarded and used only for authorised purposes. Confidentiality obligations continue even for individuals who have left their employment with us.

**Q**  
I'm travelling to a business meeting and I have a really important piece of work to complete, the contents of which are highly confidential. Is it okay if I complete this on the train?

**A**  
It is permissible for you to work in public spaces as long as you take steps to keep the information private from public viewing. As such, you will need to ensure others cannot see what you are working on. You should take extra care when working with confidential information or personal / special category data.

## Data Privacy

We are committed to respecting an individual's right to privacy, and handling data with care in compliance with applicable data protection laws and regulations. We achieve this by ensuring data is collected in an appropriate manner, kept confidential, secure and is retained no longer than is necessary.

We respect the personal lives of employees and do not take an interest in their conduct outside work unless such conduct has an impact on the performance of the employee or affects our reputation or legitimate business interests. We are all expected to respect the right to privacy and confidentiality of personal data of others.

If you are aware of a breach of data privacy, confidentiality or information security you have a responsibility to report it to the Legal & Compliance Team as soon as possible.

**Q**  
My brother is starting his own Formula One fan page and wants to send some newsletters out to fans. He asked me to share details of our fan database so he can add them to his mailing list, is this okay?

**A**  
No, you cannot provide this information. This would be a breach of data protection laws and regulations.





# Accurate Record Keeping

We all have a responsibility to maintain full, accurate and honest records of our business activities (including all payments made or received, gifts and hospitality, contributions to charities or social funds, conflicts of interest and due diligence). We must never falsify our reports, records or expense claims, or disguise the true nature or purpose of the relevant business activity.

Q

Our departmental budget is under pressure and we have recently had the delivery of some new equipment. My manager has asked me not to goods receipt the equipment until the next financial year. Is this okay?

A

No, you must goods receipt items as they arrive and follow the relevant process in a timely manner.

Q

On a work trip a couple months ago I forgot to submit all the expenses I incurred while travelling I am about to submit an expense report for a different trip and was thinking I could just "inflate" some of the new expenses to account for what was missed on the last report. This seems like a small thing as the overall reimbursement will be the same. Is it OK to handle my expenses this way?

A

No, when submitting expense reports you must account for all items accurately and honestly. Submitting a false expense report is fraud and will lead to inaccurate accounting records which could subject you or the company to criminal penalties.

Further Information

- [Expenses Policy](#)
- [Anti-Fraud Policy](#)
- [Tax & Anti-Facilitation of Tax Evasion Policy](#)





# Intellectual Property Rights

Our Intellectual Property (“IP”) is an extremely valuable asset and is critical to our business activities. Our IP includes trademarks such as word marks, logos, event titles, domain names, type face, still imagery; statistics, audio and visual content, official artwork and written content.

We offer the FIA, FOM, our partners, broadcasters and licensees the rights to use our IP and associate themselves with our brand. We take the protection of our brand and IP seriously by ensuring their proper use and by preventing unauthorised use by third parties.

We are committed to respecting the intellectual property of others. Unauthorised use of third-party IP can expose us, and individuals, to legal action, sanctions, damages and fines.

**Q**  
I’m planning on working with a third party to develop some new technology which could really improve efficiency. What steps should I take?

**A**  
You should engage with the Legal & Compliance Team at an early stage. It’s important to put in place an agreement which sets out who will own any IP in the new technology. The Legal & Compliance Team can advise if the new technology can be protected by a patent or any other form of intellectual property right.

## Example Logos



## Example Assets





# Communication With the Media

All external communication with the media has the potential to impact upon our image or reputation and must be carefully reviewed and controlled. Our Communications Team actively manages communications with customers, opinion leaders, analysts, investors, the public and other external stakeholders.

All statements to the media, interviews or responses to enquiries from the media must be co-ordinated by the Communications Team.



- Further Information
- [Social Media & Communications Policy](#)

# Social Media

Social media is an important tool for us to share information and participate in industry networking.

We are a high-profile business and brand. News travels quickly and if incorrect or misleading information becomes public by whatever means, it can damage our reputation, our competitiveness and the trust placed in us by our customers.

**What does this mean for me?**

- Never share confidential information and always use caution when sharing company information through internal or external social media channels.
  - Use sound judgement and common sense at all times and never make remarks or post comments, images or links that are incorrect or offensive.
  - Remember that liking, sharing or interacting with other people's posts that are incorrect or offensive also carries risk.
- If you are communicating on social media as an MGP colleague, you should always make sure the way you behave is respectful and appropriate, because everything you do can be linked to the Team and its reputation.



- Further Information
- [Social Media & Communications Policy](#)









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The Integrity Code is a statement of fundamental principles, policies and procedures that govern conduct and the conduct of our suppliers and partners in the course of our business. It is not intended to, and does not create any rights for any customer, partner, supplier, vendor, competitor, shareholder or any other third party or entity.

This Integrity Code has been approved by the Board of Mercedes-Benz Grand Prix Limited.

