



# Supplier Code of Conduct



AMG  
PETRONAS  
FORMULA ONE TEAM

V.001

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# Foreword



## Message From Our CEO & Team Principal

At Mercedes-AMG PETRONAS Formula One Team, excellence is not only defined by our performance on track but by the standards we uphold across every part of our business.

This Supplier Code of Conduct outlines the expectations we have of those who work with us - built on our shared commitment to integrity, respect, sustainability, and fairness. Our suppliers play a vital role in our continued success, and we rely on you to act in a way that reflects our Values and supports responsible, ethical, and compliant practices.

Together, we can drive forward innovation and performance while upholding the highest standards in everything we do and we invite you to join us on this journey towards continuous improvement and excellence.

**Toto Wolff**  
Co-Owner, Team Principal & CEO

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**Our Commitment to You**

**We strive to work collaboratively with you towards a shared goal of ESG excellence, supporting your journey from Qualifying Performance to High Performance.**

**Our Expectations of You**

We recognise that our suppliers vary in scale and operate in accordance with varying ESG standards. That's why we expect a proportionate and risk-based approach to compliance with this Code.

We also expect you to share relevant data with us to ensure transparency and facilitate effective monitoring of compliance with ESG standards.

Be honest and open with us and maintain integrity in all interactions. Dishonesty will not be tolerated. Commitment to the principles set out in this Code will inform future business decisions on who we work with.

**Talk to Us**

We're here to assist you with any questions or concerns.

**Got questions?**

If you have general queries or need guidance, reach out to your usual Mercedes-AMG PETRONAS Formula One Team point of contact.

**Speaking up**

If you suspect a serious breach of this Code, use our SpeakUp! whistleblowing service. All reports are treated confidentially and shared only with those who need to know. You can report anonymously.

You can report online:

<https://mercedesamgf1.speakup.report/SpeakUp>



**Our values shape everything we do:**

- 01. Passion**
- 02. Respect**
- 03. Innovation**
- 04. Determination**
- 05. Excellence**

**Navigating this Code**

We understand that our suppliers are diverse and located in various countries across the world. As a result, they are subject to differing laws and standards concerning ESG that apply in their home country. Nevertheless, this Code is designed to accommodate these differences while setting clear expectations for compliance and best practice that are expected from all our suppliers.

Our Code is structured around three main pillars, underpinned by five fundamental principles, that are guided by our Values. For each pillar, we outline what constitutes 'Qualifying Performance' and what defines 'High Performance'.

Qualifying Performance represents our baseline expectations, encompassing compliance with legislation and adherence to our ethical standards.

High Performance builds upon Qualifying Performance, incorporating advanced measures to further enhance compliance and ethical behaviour and embed such behaviour into your organisational culture and ways of doing business.

The key pillars are as follows:

- Integrity in Every Action
- Protecting our Environment and Communities
- Championing People



## Pillar 01

## Integrity in Every Action



## Key Principles



We uphold our values and always act with integrity.



We make ethical decisions and manage conflicts of interest responsibly.



We combat bribery, corruption, fraud, and tax evasion.



We prevent money laundering, terrorist financing, and adhere to sanctions and export controls.



We protect confidential information and ensure robust information security measures.

	Qualifying Performance	High Performance
<b>Legal Compliance</b>	Compliance with all relevant national and international laws is maintained at all times.	Proactively and regularly updating compliance programmes to anticipate and adapt to changes in laws and regulations, conducting frequent audits to ensure adherence.
<b>Anti-Corruption</b>	Robust policies and procedures are in place to prevent bribery, corruption, fraud, tax evasion, money laundering and terrorist financing.	Implementing enhanced preventative controls and monitoring systems, including regular training sessions for employees and business partners to prevent bribery, corruption, and other financial crimes, risk-based due diligence and a whistleblowing channel.
<b>Sanctions and Export Controls</b>	Compliance with sanctions and export controls.	Adoption and promotion of best practices in sanctions and export control enforcement, such as threat assessment techniques, training for employees and business partners, and due diligence.
<b>Gifts and Hospitality</b>	Gifts and hospitality are given and/or received in good faith and must not influence, or appear to influence, business decisions.	Implementing a clear policy on acceptable gifts and hospitality, delivering regular training to employees to ensure they understand and adhere to these guidelines and establishing a transparent reporting system for gifts and hospitality.



	Qualifying Performance	High Performance	Qualifying Performance	High Performance
<b>Conflicts of Interest</b>	<p>A conflicts of interest policy is in place, supported by basic procedures to identify and report potential issues.</p>	<p>Clear policies and processes are established to manage conflicts of interest effectively. Employees and management receive regular training on identifying, disclosing, and mitigating conflicts of interest.</p>	<b>Data Protection</b>	<p>Compliance with applicable data protection laws and regulations relating to the processing of personal data and the protection of privacy.</p>
<b>Confidentiality</b>	<p>There is a confidentiality policy and basic procedures are in place to protect confidential and proprietary information relating to Mercedes-AMG PETRONAS Formula One and its operations.</p>	<p>Comprehensive confidentiality policies and robust procedures to safeguard all confidential and proprietary information relating to Mercedes-AMG PETRONAS Formula One and its operations, including technical data, commercial information, and any other sensitive materials, are in place. These should include secure data handling practices, access controls, and regular training for employees to ensure awareness and compliance with confidentiality obligations.</p>	<b>Cybersecurity Measures</b>	<p>Implementation of basic cybersecurity measures to protect against unauthorised access, data breaches and cyber threats.</p>
<b>Subcontractor Compliance</b>	<p>Subcontractors agree to comply with this Code or substantially similar standards.</p>	<p>Training and resources to meet or exceed the standards set out in this Code are provided, periodic audits of subcontractors are undertaken to ensure compliance.</p>		<p>Advanced cybersecurity measures are in place, training on cybersecurity is provided to employees, regular penetration testing is carried out and cybersecurity measures are continuously reviewed and updated.</p>



## Pillar 02

# Protecting our communities and the environment



## Key Principles



We are committed to enhancing performance while minimising environmental impact, embedding sustainability into our operations and supply chain strategy.



We aim to achieve Net Zero emissions across all scopes by 2040 and to achieve Race Team Control Net Zero by 2030.



We are committed to decoupling growth and activity from resource consumption.



We are committed to driving positive change through our support of charitable and community initiatives in the areas where we work, live and compete.

	Qualifying Performance	High Performance
<b>Compliance with Regulations and Standards</b>	<p>Adherence to all relevant environmental laws and regulations including the maintenance of necessary environmental permits.</p> 	<p>Going beyond compliance by implementing and continuously improving an environmental management system, such as ISO 14001. This involves regular reviews and updates to monitor and mitigate environmental impacts proactively.</p>
<b>Emission Tracking</b>	<p>Monitoring and reporting organisational greenhouse gas emissions annually.</p> 	<p>Committing publicly to ambitious climate goals, such as achieving Net Zero emissions. This includes measuring the carbon footprint at product level, and engaging with internationally recognised frameworks/standards that promote accountability and progress, such as the Climate Pledge.</p>
<b>Efficient And Low-Emission Operations</b>	<p>Basic measures to reduce energy and water consumption have been implemented, with initial steps taken to encourage the transition to lower-emission alternatives where feasible.</p> 	<p>Maximising resource efficiency by utilising renewable energy sources, achieving high levels of energy and water efficiency, reusing and recycling materials wherever possible, and actively promoting the shift to low-emission technologies such as electric vehicles and utilising alternative sustainable fuels where available.</p>
<b>Global Warming Potential (GWP) Products</b>	<p>Minimising the use of products with high global warming potential.</p> 	<p>Actively eliminating high GWP products and substituting them with low GWP alternatives, collaborating with subcontractors to promote similar practices.</p>

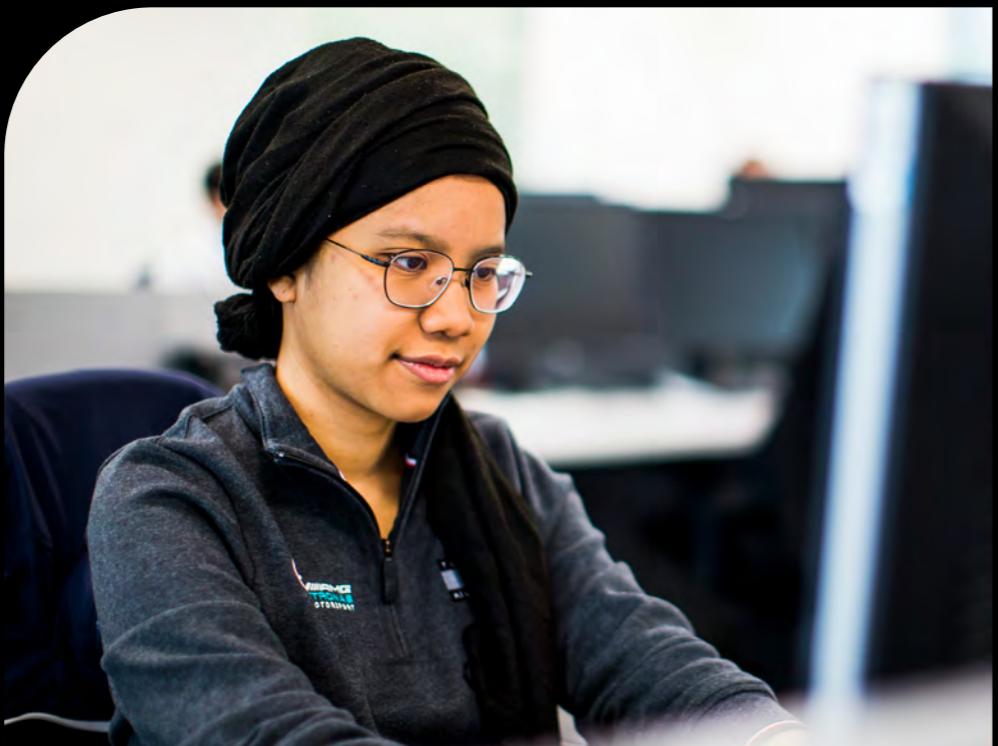


	Qualifying Performance	High Performance
<b>Waste Management</b>	Ensuring proper separation, storage, handling, transportation, and disposal of hazardous and non-hazardous waste in accordance with local laws, using authorised companies.	Implementing comprehensive recycling and waste reduction programmes aimed at achieving zero waste to landfill, promoting circular economy principles.
		
<b>Habitat Protection</b>	Avoiding activities that harm local habitats..	Actively engaging in the restoration and enhancement of local habitats and biodiversity.
		
<b>Community Engagement</b>	Participating in local community events and initiatives.	Leading large-scale community projects and initiatives that foster strong relationships with community stakeholders and drive significant positive change.
		
<b>Charitable Contributions</b>	Making occasional donations to local charities.	Establishing long-term partnerships with charitable organisations and contributing to impactful projects.
		



# Championing People

## Pillar 03



### Key Principles



We prioritise the health, safety, and security of our people.



We uphold human rights and seek to combat modern slavery in our operations.



We champion equality, diversity, and inclusion in all aspects of our work and our impact.



We promote dignity and respect in the workplace.



We empower our people to reach their full potential.

	Qualifying Performance	High Performance
<b>Legal and Contractual Compliance</b>	<p>Adhere to all local labour laws, ensure all workers have the legal right to work, and never use child labour.</p> 	<p>Providing all workers with written contracts outlining terms of employment, avoiding excessive use of fixed-term contracts, casual or agency workers. Conduct age verification checks for all workers and document evidence to show compliance with ILO Convention No. 138.</p>
<b>Training and Development</b>	<p>Provide essential training to employees including onboarding sessions, safety training, and basic job-specific training.</p> 	<p>Implementing continuous training programmes that focus on the development of employees' skills and careers, including leadership development. Create apprenticeship programmes or similar initiatives that provide structured training and career development opportunities.</p>
<b>Preventing Exploitation</b>	<p>All employees are treated with respect and dignity and modern slavery, forced labour, bonded labour, prison labour, or child labour is not tolerated.</p> 	<p>Due diligence processes to identify forced labour, modern slavery, or child labour in the organisation and the supply chain are in place. Ongoing training for all employees, especially managers, on recognising and preventing exploitation and collaborate with suppliers to ensure ethical practices throughout the supply chain is provided.</p>
<b>Health &amp; Safety</b>	<p>A safe and healthy working environment is provided that complies with basic health &amp; safety standards and regulations. Personal protective equipment and training on its use is provided at no cost.</p> 	<p>Health &amp; safety policies are established and reviewed regularly. Workers are trained in safety practices, and first aid facilities are available on site. There is evidence of implementing advanced safety protocols, conducting regular risk assessments, inspecting machinery, and protecting the health of pregnant workers.</p>



Qualifying Performance	High Performance
<b>Diversity, Equity, and Inclusion</b>  	<p>Foster an inclusive workplace culture where all employees feel valued and respected, regardless of their background. Ensure no discrimination in hiring, compensation, training, promotion, or termination.</p> <p>Implementing and regularly reviewing policies that promote diversity, equity and inclusion in the workplace, including in recruitment (including at Board level), development, and advancement. Diversity and inclusion training is provided to all employees, diversity and inclusion targets are regularly reviewed and progress reports published.</p>

## Delivering a High-Performance Culture

At Mercedes-AMG PETRONAS Formula One Team we aspire to excellence through the creation of a high-performance culture and by looking to improve continuously. We expect our suppliers to share that ambition and share our success. We therefore expect our suppliers to ensure this Code is translated into their ways of working.

### Adopting Processes and Systems

Our suppliers must maintain appropriate systems to ensure ongoing compliance with this Code and be able to demonstrate such compliance through the following mechanisms:

- business continuity plans: suppliers should be able to respond to, mitigate and recover from disruption (such as natural disasters, software viruses, terrorism or pandemics/epidemics), and have plans in place to protect both employees and the environment in these circumstances.
- supply chain management: we expect suppliers to share our commitment to be a responsible and sustainable business, make a positive contribution to society and to manage and minimise any negative ethical, social and environmental impacts of their supply chain.
- training: a system of training should be implemented for workers to ensure that they are aware of the requirements of this Code.

Suppliers shall provide any additional third-party or self-certifications that are reasonably required to demonstrate compliance with all applicable laws and frameworks within a reasonable period of written request from us.

Suppliers shall actively monitor their compliance with the standards set out in this Code, including both the Qualifying Performance and, where applicable, High Performance expectations, and report any actual or suspected breaches to us as soon as possible. Suppliers must not retaliate against, or take disciplinary action against, any worker who reports a breach, raises concerns about questionable behaviour, or who has sought advice regarding the standards set out in this Code.

We reserve the right to update this Code from time to time and will provide you with the latest version following any such revision.

### Being Accountable

All suppliers must provide written confirmation to us at least once per year that they:

- have appropriate systems in place to monitor and maintain compliance with the standards set out in this Code, including both the Qualifying Performance and, where applicable, the High Performance expectations; and
- are able to meet these standards consistently throughout the duration of their relationship with us.



# Contact Information

If you have any questions about this policy, speak to your main point of contact at Mercedes-AMG PETRONAS Formula One Team or email:

[legal@mercedesamgf1.com](mailto:legal@mercedesamgf1.com)

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This Policy has been approved by the management of Mercedes-Benz Grand Prix Limited.