

# Supplier Code Of Conduct

## The Automobile Association (AA)

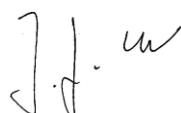
### Introduction

At the AA, acting ethically and responsibly isn't just the right thing to do – it's fundamental to how we do business. As one of the UK's most trusted brands, our reputation is built on integrity, fairness and respect. These values guide our ambition to be a sustainable and successful business.

Our commitment to responsibility extends beyond our own operations to every partner in our supply chain. We choose to work with suppliers who share our high standards – from safeguarding people and the planet, to protecting data and upholding the law. We value open, collaborative relationships with our suppliers. By working together, we can raise standards, reduce risk and create long-term value for our customers, communities and each other.

Thank you for your continued partnership and for helping us uphold the values that define the AA.

**Jakob Pfaudler**



Chief Executive Officer

### Aims of the Code

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The Code specifies the minimum standards we require of our suppliers and 3<sup>rd</sup> party providers. By working with us, you agree to comply with this Code, and to ensure that your employees, subcontractors and supply chain understand and adhere to these standards. Our aim is not only to ensure legal compliance, but to promote ethical, sustainable practices across our supply chain.

### Definitions

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‘the AA’ and ‘the Group’ means the AA Limited group of companies including any affiliate companies or subsidiaries, either partly or wholly owned.

‘Supplier’ means any third-party organisation, subsidiaries, affiliates, subcontractors or individuals acting for and on behalf of the AA, or any of its companies.



'Employees' means any individual directly or indirectly employed by the AA, including permanent or contracted staff, and representatives appointed to act on our behalf.

## Our Code of Conduct at a Glance

### Our 7 Key Principles for Suppliers

 <b>Integrity &amp; Honesty</b> Do the right thing. No bribery, no corruption, no unethical practices.	 <b>Legal Compliance</b> Follow the law. Comply with all applicable regulations wherever you operate.
 <b>Respect for People</b> Treat everyone fairly. No exploitation, discrimination, or harassment. Uphold human rights and decent working conditions.	 <b>Safety First</b> Protect health and wellbeing. Provide a safe working environment and prevent harm.
 <b>Data Protection &amp; Cybersecurity</b> Safeguard information. Keep The AA data secure, protect privacy, report breaches promptly. 'Secure by Design'	 <b>Environmental stewardship</b> Care for the planet. Reduce emissions, minimise waste, and support sustainability goals.
 <b>Quality &amp; Accountability</b> Provide quality goods/services, own up to issues, help us serve customers well	

Our Code supports the AA's commitment to acting ethically and responsibly and has 7 key pillars that define the behaviours we expect of you:

**Ethical dealings:** we expect you to uphold high ethical standards and conduct business with integrity, transparency and fairness. We expect you to have zero tolerance for any form of bribery, corruption, fraud, or anti-competitive practices and comply with all applicable laws.

**Compliance with laws:** we are committed to operating within the framework of the laws, rules and regulations applicable to our business and expect you to comply with these also.

**Environmental:** we expect you to operate in an environmentally responsible manner, complying with laws and reducing environmental waste. We expect you to support us where appropriate in the achievement of our environmental goals.

**Health and Safety:** to provide a healthy and safe environment for employees, visitors, contractors and all those within your community.

**Employment standards:** to comply with all applicable employment laws and to support the protection of human rights in all territories in which you operate.



**Data Protection and Cybersecurity:** we expect you to manage, use and secure any data received from the AA in a way that complies with the law, and maintains the confidentiality, integrity and availability of the data, and the AA's reputation. Data should never be used for personal or commercial gain. Any products used should follow 'Secure by Design' principles.

**Customer outcomes:** to work with us to ensure our customers receive good outcomes in line with the FCA's Conduct Risk and Consumer Duty requirements (putting customer needs first, and ensuring that vulnerable customers receive the same or better outcomes than customers who are not), raising issues or potential breaches with the AA within **72 hours** of identification.

## **The Code**

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### **Ethical Business Practices**

You must uphold high ethical standards and conduct business with integrity, transparency and fairness, including:

- **Anti-Bribery and Corruption:** We have zero tolerance for bribery or corruption in any form. You must not offer, give, solicit or accept any bribes or improper payments or advantages to induce or expedite routine processes or business dealings.
- **Anti-Corruption Laws:** You must comply with all applicable anti-corruption laws (including the UK Bribery Act, and any local legislation). You must not do anything that would cause us to be in violation of such laws. Maintain accurate books and records so that payments are honestly described and documented; we reserve the right to audit relevant records to ensure compliance.
- **Conflicts of Interest:** Avoid any situations where your interests conflict with ours. For example, if you have a personal relationship or financial stake that could improperly influence the business, you must disclose it to us. Do not offer our employees any form of personal benefit (beyond token gifts or hospitality which must strictly comply with our Gifts and Hospitality process) in exchange for preferential treatment. Likewise, our employees must not ask for personal favours. Any potential conflict or connection (such as if a supplier's employee has family working at the AA) should be transparently communicated.
- **Fraud and Money Laundering:** Fraudulent practices, deception, or facilitating money laundering, tax evasion or corporate fraud are strictly forbidden. Ensure all invoices and documents you present are accurate and truthful.

### **Whistleblowing and Reporting:**

You should have a mechanism for your employees to report unethical behaviour or violations of this Code without fear of retaliation. Similarly, if you become aware of any possible breach of this Code or law in relation to our



business together you must promptly inform us. The AA offers a confidential reporting line (contact info: [File a Report - Safecall Ltd](#) for anyone – including supplier staff – to report concerns. We will treat reports in confidence and investigate as appropriate.

### **Compliance with laws**

We expect you to comply with both the letter and the spirit of all applicable laws and regulations, including those referenced in this Code, as well as international trade etc.. It is your responsibility to stay informed of legal requirements in your industry and region. If compliance with a certain law would directly conflict with meeting a requirement of this Code, you should notify us to discuss a solution. We expect Suppliers to have adequate internal controls and procedures to ensure legal compliance (e.g., policies, training, and management oversight).

### **Environmental**

The AA is committed to supporting the UK's transition to a low-carbon economy and delivering on our target of net zero operational emissions by 2035, and we look for Suppliers who share that commitment. At a minimum you must comply with all applicable environmental laws and regulations (e.g. Streamlined Energy and Carbon Reporting, Environment Act, Environmental Protection Act).

In addition, we expect:

- **Pollution Prevention:** Ensure that resources are used efficiently and that no unlawful pollution of air, water or soil occurs. This includes ensuring that waste created is stored, transported, recycled or disposed of in a way that reduces environmental impact and complies with relevant regulation (e.g. Waste Duty of Care, Hazardous Waste Regulation).
- **Climate and Energy:** Work towards reducing energy usage and greenhouse gas emissions. We encourage you to set emission reduction targets, improve energy efficiency and consider renewable energy where possible. If you measure your emissions (scope 1, 2 and 3), be prepared to share relevant data with us, as we track our supply chain footprint.
- **Environmental Management:** you should have an appropriate environmental management system or policies to monitor and reduce your environmental impact, and have controls to prevent pollution of air, land, and water including avoiding and managing spills, leaks, or uncontrolled discharges.
- **Continuous Improvement:** Environmental responsibility is an ongoing effort. We encourage suppliers to innovate and implement best practices that reduce environmental impact. If you have initiatives (e.g., carbon neutrality for your operations, zero-waste programs), we view that positively in our supplier evaluations. We may periodically request information on your environmental programs or performance as part of our ESG reporting.



## Health and Safety

You must make proper provision for the health, safety and welfare of your employees, visitors, contractors and those in the community who may be affected by your activities. A safe and healthy working environment should be provided and best occupational health and safety practice promoted, bearing in mind the prevailing knowledge of the industry and any identified hazards. You are encouraged to implement a health and safety management system and should work towards certification similar to ISO45001 (UKAS accredited).

## Employment standards

We expect you to actively manage your own operations and supply chains to uphold the following employment standards:

- **Modern slavery:** Modern slavery in any form including forced labour, servitude, and human trafficking is strictly prohibited. You must comply with relevant modern slavery laws and ensure the same high standards apply throughout your own supply chains.
- **Child labour:** The employment of children under 15, or under the legal school-leaving age where higher, is strictly prohibited.
- **Diversity and Equality:** You should aim for equal opportunity and treatment of all employees and strive for workplaces that are free from discrimination, harassment, or abuse.
- **Pay and benefits:** You must comply with national laws on wages and benefits, ensuring compensation is fair, meets basic needs, and includes lawful overtime pay.
- **Working hours:** You are expected to comply with national regulations on working hours. Employees should have annual leave provision and be permitted at least one non-working day per seven days on average.
- **Freedom of Association and Collective Bargaining:** You shall freely allow workers to associate with others, form, and join (or refrain from joining) organisations of their choice, and bargain collectively, without interference, discrimination, retaliation or harassment. In the absence of formal representation, you must ensure that workers have a mechanism to report grievances and that facilitates open communication between management and workers.

## Data Protection and Cybersecurity

In the course of our business, Suppliers may have access to confidential information, personal data, or IT systems. We require all suppliers to safeguard data and digital systems conscientiously. Specifically:

- **Confidential Information:** Any non-public information about us or our customers that you receive must be used only for its intended purpose and protected from unauthorized disclosure. Implement controls to prevent leaks or misuse (e.g., NDAs with employees, need-to-know access). These obligations shall continue after your contract ends.
- **Personal Data & Privacy:** If you handle personal data (of our customers, employees, or any individuals) on our behalf, you must comply with data



protection laws such as the UK GDPR/Data Protection Act. This includes processing data lawfully and securely. You should only process the data as instructed by us and not keep it longer than necessary. Individuals' privacy rights (like access or deletion requests) must be respected with our coordination.

- **Cybersecurity:** We expect you to maintain robust cybersecurity practices to protect data and services. At a minimum, you should have up-to-date antivirus/anti-malware protection, secure network firewalls, access controls (limit access to data to authorized personnel only), and encryption of sensitive data in storage and transit, where feasible. Keep your systems patched against security vulnerabilities. Train your staff on cyber hygiene (beware of phishing, use strong passwords, etc.). If you connect to our network or systems, you must meet any additional IT security requirements we specify. Any products used should follow 'Secure by Design' principles.
- **Breach Reporting:** You must **immediately notify us of any data breach or cybersecurity incident** that could affect our data, our business, or our customers. This includes if you suspect that confidential information or personal data has been lost, stolen, or accessed without authorization, or if your IT systems are compromised (e.g., ransomware attack) that could disrupt services to us. Time is of the essence in such cases. We expect full cooperation in investigating and remediating the issue, including informing relevant authorities or individuals if required by law.
- **Intellectual Property:** You are only permitted to use our trademarks, logos, or other IP in accordance with the requirements specified in our contract with you, and as per our brand guidelines. Do not infringe the IP of others in work you do for us (e.g., do not supply counterfeit goods or unlicensed software).

Specific data protection, IP, confidentiality and information security obligations may be included in your contract with us, with which you must strictly comply.

## Customer Outcomes

We are committed to delivering high-quality products and services to our customers, and our Suppliers play a key role in working with us, to ensure our customers receive good outcomes in line with the FCA's Conduct Risk and Consumer Duty requirements. You must ensure that the goods or services you provide meet the quality standards we have agreed upon (and ideally, strive to exceed them). This includes:

- **Customer Welfare:** if your work can directly affect our end-customers, put our customers' needs first, avoiding foreseeable harm and ensure that customers who exhibit characteristics of vulnerability, receive the same, if not better outcomes, than customers who do not. Any issues or potential breaches must be raised with the AA within 72 hours of identification.
- **Regulatory Compliance in Services:** If you support us in a regulated activity (e.g., insurance services, finance, etc.), you may be required to follow additional guidelines to ensure compliance and achievement of fair customer



outcomes. We will communicate any such requirements to you (for example, training on treating customers fairly). It is important that you take these seriously, as regulatory compliance in service delivery is as critical as product quality.

- **Quality Management:** Have systems to check and maintain quality (e.g., QC processes, relevant certifications such as ISO 9001 if applicable). If we have provided specifications, you must strictly adhere to them. Do not make unauthorized substitutions of materials or sub-components.

## **Compliance Monitoring and Enforcement**

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The AA's goal is to drive excellence in these areas throughout our own organisation, and to support and positively influence the development of these areas at all levels of our supply chain. We strive only to do business with suppliers who share our commitment.

This Code outlines our expectations for suppliers we do business with; we are committed to supporting our suppliers in this respect, including working together to improve your ability to meet these expectations. We welcome open, honest discussions with you where you feel you might not be able to fully adhere to the Code and the opportunity to explore solutions to these challenges.

Where you are unable or unwilling to meet these standards, the AA will endeavour to resolve the potential issue by working closely with you. If you continually breach this Code or refuse to comply, we will re-evaluate our business relationship. A breach of an applicable law may result in termination as an AA supplier (and we reserve our rights at all times in respect of the same) and a referral of the matter to relevant authorities.

Thank you for your commitment to upholding these standards. By working in accordance with these principles, we all help ensure a sustainable and successful future for our businesses and communities.

## **Report suspected violations of the Code**

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You can report suspected violations of this Code to the AA Group Procurement team at [AAProcurementTeam@TheAA.com](mailto:AAProcurementTeam@TheAA.com). All such reports are treated as confidential and may remain anonymous where permitted by law.