

## The AA's Anti-Bribery Statement

The AA's long-standing values of courtesy and care are at the heart of all we do. Our pledge to responsible business and service excellence has been steadfast since the AA was established, over 110 years ago.

AA Ltd, its subsidiaries and joint venture companies (together the "AA Group") is committed to conducting all business in an honest and ethical manner. Also, to acting professionally, fairly and with integrity in all its business dealings and relationships. We adopt a zero-tolerance approach to incidents of bribery or corruption and are fully committed to complying with our obligations under applicable legislation, including the Bribery Act 2010.

### Our Policy

The AA's Anti-Bribery and Allowable Gifts, Hospitality and Donations Policy (the 'Policy') applies to all companies within the AA Group and to anyone working for any such company in any capacity, wherever located. The Policy defines acts of bribery and describes the steps we require all of those working for the AA to take to help prevent bribery in all its forms. Any act of bribery is unacceptable, and the Policy sets out the associated penalties and implications to the individual and the company, which includes disciplinary action, fines, reputational damage and criminal prosecution.

### Gifts and hospitality

AA employees are expected to conduct themselves with integrity and impartiality always. We recognise that in some circumstances, in the normal course of business, it is permissible for gifts to be exchanged and hospitality to take place with third parties. Our Policy states our authorisation and record keeping procedures.

### Political and Charitable Donations

The AA has a policy of not making donations to political organisations or independent election candidates or incurring political expenditure anywhere in the world as defined by relevant legislation.

The AA supports charitable initiatives through the AA Charitable Trust for Road Safety and Environment which was established to support the preservation and protection of human life and health on roads and in motor vehicles in the United Kingdom. The AA also supports Ben, the independent charity that helps employees and their dependents in the wider automotive industry. AA employees also select and support a range of charities.

The AA communicates with the government and others on areas which affect our business, employees, members or shareholders, such as road safety, as a way of assisting in the development of relevant regulation and legislation.

### Anti-Competitive Practices

The AA has a zero-tolerance approach for anti-competitive practices, and is committed to ensuring that we act honestly and in accordance with the relevant Competition Law in the jurisdictions we operate in.

### Conflicts of Interest

The AA is committed to minimizing and managing Conflicts of Interest where they may occur. The AA has put procedures in place to ensure that any potential conflicts of interest are declared, and either avoided or managed. Declared conflicts of interest are kept under review and are regularly monitored. The AA has robust internal processes to ensure systems and controls operate effectively with regards to integrity of information.

### Employee Training

All AA employees are required to undertake mandatory Financial Crime training annually which covers anti-bribery and corruption, anti-money laundering, competition law, sanctions and fraud), and includes an assessment which is required to be passed. Employees are also required to undertake Conflicts of Interest training annually.

In addition, further ad-hoc and bespoke training is provided to those employees who work in roles which are considered to have an increased anti-bribery and corruption risk.

### Whistleblowing

The AA encourages genuine concerns about malpractice or inconsistent behavior, including matters related to bribery and corruption to be raised as early as possible. Should an individual have concerns, the company Whistleblowing Policy sets out the procedure for raising it in a safe and confidential manner.

The AA's Anti-Bribery, Conflicts of Interest and Whistleblowing Policies are internal documents, made available to our employees on our Intranet and applicable related persons on request.