



Supplier Code of Conduct

Overview

The AA's Supplier Code of Conduct (the Code) sets out the regulations, behaviours and values which we expect suppliers to the AA Group to adhere in order to remain an approved provider of the AA.

Scope

This Code applies to all approved suppliers and contractors to the AA Group. This Code is fully supported by AA Limited and all subsidiary members of the AA Group.

Enforcement

This Code is intended to protect the AA, our Members, personnel and business partners. If it is evidenced that an approved supplier is not adhering to the Code then, depending on the gravity of the behaviour, a decision will be made as to whether the supplier will continue to work for the AA.

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1.0 Introduction

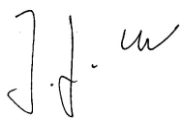
At the AA, we believe that acting ethically and responsibly is not only the right thing to do, but essential for our business.

As a brand which is admired and held in high regard of trust, the AA has strong values and principles which remain a powerful driver in our continual desire to remain a sustainable and commercially successful business. Importantly, this approach covers both our own business operations and our wider supply chain.

We have a responsibility to ensure that the third parties we choose to do business with, and the manner in which they do business, are a positive reflection on both our brand and corporate values. We seek to work with companies who share similar ethical standards and values to ours and who will commit themselves to meeting the requirements of the Code and relevant laws. We are committed to establishing mutually beneficial relations with our suppliers and business partners in order to raise standards, drive sustainable practices and create shared value for all.

We conduct our operations with integrity and in accordance with the principles of fair competition. We strive only to do business with organisations who uphold similar business principles.

Jakob Pfaudler



Chief Executive Officer

2.0 Aims of the Code

The Code specifies the minimum standards of behaviour the AA expects of our approved suppliers. The purpose of the Code is to formally communicate the AA requirements and expectations to the supply chain. Suppliers are required to adhere to and comply with the principles set out in this document.

3.0 Definitions

‘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 and subcontractors or individual acting for and on behalf of the AA, or any of its companies.

‘Employees’ in relation to the AA means any individual directly or indirectly employed by the AA, including permanently employed or contracted staff, and any representative or agents appointed to act on our behalf.

4.0 Our Code of Conduct at a Glance

Our Code supports the AA’s core values of Courtesy, Collaboration, Care, Dynamism and Expertise and has five main pillars. Each pillar is supported by an action statement and behaviour which we expect of our suppliers.

Ethical dealings: we expect our suppliers to avoid any conflict of interest in their business dealings, conducting their business with integrity and full transparency.

Environmental: we expect our suppliers to support us where appropriate in the achievement of our environmental goals, to comply with all applicable laws and to strive for best practice in the design and manufacture of products or services provided to the AA.

Health and Safety: we expect our suppliers to provide a healthy and safe environment for employees, visitors, contractors and all those within their community.

Employment standards: we expect our suppliers to comply with all applicable employment laws and to support the protection of human rights wherever they operate in the world.

Proprietary information: where applicable, we expect our suppliers to manage, use and secure any data received from the AA in a way that complies with the law, and maintains integrity and reputation. Data should never be used for personal or commercial gain.

Facilitation of tax evasion: we are committed to complying with the Criminal Finances Act 2017, and do not condone, encourage or support any form of tax evasion.

Compliance with laws: we are committed to operating within the framework of the laws, rules and regulations applicable to our business. Compliance with the law is an absolute requirement for all AA suppliers. We require all suppliers to engage with us promptly and proactively so that we can discharge our responsibilities relating to matters such as the off-payroll working (IR35) rules.

Customer outcomes: All suppliers are required to work with the AA to ensure our customers receive good outcomes in line with the FCA's Consumer Duty requirements. Any issues or potential breaches must be raised with the AA as soon as possible.

5.0 The Code

5.1 Ethical dealings

Suppliers to the AA must not offer gifts or favours to the AA's employees that may be seen as an attempt to influence business decisions. All suppliers must conduct their business to a high ethical standard and comply with all relevant legislation on bribery, corruption and prohibited business practice.

5.2 Environmental

At the AA we are committed to reducing our greenhouse gas emissions, utilising natural resources efficiently and preventing pollution in ways that ensure the long-term sustainability of the business, and minimise our impact on the environment. We expect our suppliers to support our environmental goals, driving continual improvement and reducing environmental impacts, whilst ensuring full alignment with relevant policies and best practices including but not limited to the following:

- Comply with all applicable current and future environmental laws, regulations e.g. Streamlined Energy and Carbon Reporting requirements and standards including compliance with industry best practice standards for the responsible sourcing of products and materials such as The Forest Stewardship Council (FSC) and Programme for the Endorsement of Forest Certification, Fairtrade, labelling and other relevant standards.
- Seeking to reduce negative environmental impacts including the prevention of pollution and providing visibility to progress towards this commitment. We expect our suppliers to encourage the use of environmentally friendly technologies and practices and the reduction of negative environmental impacts throughout their supply chain.
- Seeking to measure and understand the Greenhouse Gas emissions associated with its supply of products or services and support the AA in understanding its Scope 3 emissions within the supply chain.

Suppliers are encouraged to implement an environmental management system and we would value suppliers who are working towards or have a certified management system such as or similar to ISO14001 (UKAS Accredited).

5.3 Health and Safety

The AA's suppliers will make proper provision for the health, safety and welfare of their employees, visitors, contractors and those in the community who may be affected by their 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 of any identified hazards. The AA expects complete adherence to any applicable local laws. Suppliers are encouraged to implement a health and safety management system and should work towards having a certified management system such as or similar to the Occupational Health and Safety Assessment Standard (OHSAS) 18001 (until 12/03/21) or ISO45001 (UKAS accredited).

5.4 Employment standards

Suppliers should drive active management of downstream supply chain in all fundamental aspects mentioned below.

Modern slavery: Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour as well as human trafficking all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to ensuring there is transparency in our own business and supply chain in our approach to tackling modern slavery which is consistent with our disclosure obligations under the UK Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners. We impose a condition within our contracting process forbidding the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. We expect that our suppliers will apply the same high standards to their own organisations and supply chain.

Child labour: The use of child labour or practices that inhibit the development of children in any form, is strictly prohibited. Suppliers must comply with all child labour laws and should not employ anyone under the age of 15, or where it is higher, the mandatory school leaving age in the local country. If a supplier is discovered to be employing young workers, the AA will look to withdraw from all relevant contracts immediately.

Diversity and equality: Suppliers should aim to provide equality of opportunity and treatment regardless of race, colour, gender, gender identity or expression, religion, nationality, sexual orientation, maternity, age, disability or political affiliations. Suppliers are expected to support equal pay for work of equal value. Suppliers must oppose discrimination or intimidation towards employees including all forms or threats of physical and psychological abuse. Suppliers must also promote work free from harassment, victimisation or any other form of inappropriate behaviour or abuse on any grounds. As part of the supplier's commitment to diversity and equality, the principles of inclusion and accessibility are required throughout their own supply chain. Suppliers should where possible work with diverse businesses, ensuring inclusive sourcing activities and decisions are made with regard to supplier selection

Pay and benefits: As a minimum, the AA expects suppliers to comply with all national regulations on pay and benefits. These should be sufficient to meet basic needs of workers and families. They must be compensated at a minimum in line with local laws for overtime hours worked.

Working hours: The AA's suppliers 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: Suppliers 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, suppliers shall ensure that workers have a mechanism to report grievances and that facilitates open communication between management and workers.

5.5 Proprietary information

Any personal data you receive through business dealings with the AA must only be used for the agreed purpose. Security of such personal data is paramount and all personal data should be kept securely, protected from unauthorised access or disclosure and retained only for as long as is necessary to provide the services. You are required to comply with all relevant Data Protection legislation and best practice guidance (as amended and updated from time to time). Specific data protection and information security obligations may be included in your contract with us, which you must strictly comply with.

5.6 Facilitation of tax evasion

We expect all our suppliers to pay their taxes in accordance with the law. The AA will not tolerate the facilitation of tax evasion within our supply chains, and we expect our suppliers to put in place reasonable prevention measures to ensure that they, and any persons associated with them, do not engage in tax evasion or the facilitation of tax evasion.

5.7 Compliance with laws

All suppliers are expected to comply with all applicable legislation and other legal requirements that apply to them. We expect our suppliers to comply with both the letter and the spirit of the law.

5.8 Customer Outcomes

All suppliers are required to work with the AA to ensure our customers receive good outcomes in line with the FCA's Consumer Duty requirements. Any issues or potential breaches must be raised with the AA as soon as possible.

6.0 Communication

We expect our suppliers to make this Code readily available to employees and contractors to ensure relevant employees are able to clearly evidence the values of the organisation. Suppliers should comply with this code and disseminate these appropriate values throughout their own supply chain. The AA is open to working collaboratively to ensure the Code is able to be implemented and followed.

7.0 Violation of our Supplier Code of Conduct

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 the supplier's ability to

meet these expectations. We welcome open, honest discussions with suppliers where they feel they might not be able to fully adhere to the Code and the opportunity to explore solutions to these challenges.

Where there is a failure to comply with these standards, the AA will endeavour to resolve the potential issue by working closely with the supplier. If a supplier continually breaches this Code or refuses to comply, we will re-evaluate our business relationship. A breach of an applicable law will result in termination as an AA supplier and a referral of the matter to local authorities.

8.0 Report suspected violations of the Code

Suppliers, employees, or contractors may report suspected violations of this Code to the AA Procurement team at AAProcurementTeam@TheAA.com. All such reports are treated as confidential and may remain anonymous where permitted by law.