

# OUR ETHICS AND BUSINESS INTEGRITY POLICY GENERAL STATEMENT.

The purpose of this policy is to describe our requirements for conducting business to the highest ethical standards at Stobart Group. Our policy sets out what we expect from every single person that works for us and for the businesses and organisations that we partner with. These policies also underline our responsibilities to our people, partners and shareholders.

These policies intend to help us all make informed decisions, engender trust within Stobart and reflect our values of honesty and openness in how we operate. This document should be read in conjunction with Stobart's other policies which are available on our [website](#).

## Speaking up

We want to enable and encourage our people to feel comfortable to report any suspected wrongdoing at any level of the business, with business partners or in our supply chain without fear of reprisal. All concerns raised will be taken seriously and investigated appropriately. Employees can report issues through their line manager, team leaders or through the People team. If this is not possible, employees can ring Stobart's confidential whistleblowing hotline. For more information please read our [Whistleblowing Policy](#).

## Compliance with the law

We operate and function within the applicable laws of the land and respect the rule of law in all of our dealings. We clearly communicate procedures for disciplining those who do not comply with the law or our standards and policies and maintain a system for confidential reporting of breaches of those laws, standards and policies through line managers and team leaders.

## Commitment to human rights

We conduct our business in a manner that respects the human rights and dignity of our people and those we partner with. Each of us can play a role in the elimination of human rights abuses such as child labour, human trafficking, modern slavery and forced labour. If you believe there may be any breach of human rights taking place in our operations or in those of our business partners then please contact your line manager immediately. For further information please read our [Slavery and Human Trafficking Statement](#).

## Conflicts of interest

A conflict of interest occurs when personal interests affect your ability to make objective decisions for Stobart Group. Be aware of the many different ways in which conflicts of interest can occur, for example:

- Outside jobs and affiliations with competitors, customers or suppliers.
- Working with close relatives, especially those who are government officials.
- Serving as a board member of another organisation.

If you find yourself in a position where you think you may have a conflict of interest please disclose the situation to your line manager. Once disclosed, we are in a better position to assess and address any potential conflict.

## Political activity and donations

As an individual, you have the right to personally participate in the political process, including making personal political contributions. However, you need to make it clear that your personal views and actions are not those of Stobart Group. This includes:

- Not using company funds or resources to support any political candidate or party.
- Obtaining approval before engaging in any lobbying activities.
- Seeking advice from your line manager regarding any personal political activities if you or a close relative are planning to accept or seek a public office, or if any other political activity might have an impact or create a conflict with Stobart Group.

## Gifts and hospitality

We support the reasonable and proportionate giving and receiving of hospitality as part of a normal business relationship. However, we prohibit the giving or receiving of any gifts or hospitality that are excessive or improper. We need to ensure that we are never influenced by, or seek to influence through, the provision of gifts or hospitality. We do not give or receive gifts or hospitality during a tender process. For more information please read our [Anti-Bribery and Corruption Policy](#).

## Bribery and corruption

We take a zero-tolerance approach to bribery and corruption and comply with anti-bribery and corruption laws and regulations. We are committed to implementing and enforcing effective systems to counter bribery and corruption and we encourage our business partners to share our commitment. For more information please read our [Anti-Bribery and Corruption Policy](#).

## Preventing money laundering

Money laundering is the process of hiding illegal funds or making them look as though they are legitimate. It also covers the use of legitimate funds to support crime or terrorism. Always ensure you know who you are doing business with by following our due diligence process for working with partners and suppliers. If you have any concerns please raise these with your line manager or team leader.

## Anti-competitive

We believe in fair competition and discourage all forms of anti-competitive practices that could damage our business. Employees should never encourage customers, suppliers or former employees of competitors to provide confidential information or seek, accept or discuss confidential information with competitors. Competition and antitrust laws are complex and often very specific, as such if you have concerns please consult your People Manager who can consult the legal team.

## Diversity and inclusion

We pursue equality of opportunity and inclusion for all employees through our employment policies and practices. We aim to create an inclusive environment which provides equality of opportunity and freedom from unlawful discrimination on the grounds of race, gender, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs, age or sexual orientation.

We must all challenge discriminatory behaviour when we see it. We want everyone to feel able to raise any concerns. The Company is committed to actively opposing all forms of discrimination. If you have any concerns regarding unfair or discriminatory practices please contact your line manager in the first instance. For more information please see our [Diversity and Inclusion Policy](#).

## Preventing harassment and bullying

Stobart Group will not tolerate harassment or bullying. Harassment and bullying can take many forms and have serious consequences. We must all take responsibility to ensure that such behaviour does not happen at Stobart. We may instigate disciplinary or legal action against people who harass or bully others. We will treat each other respectfully and challenge any unfair behaviour.

## Environmental, social and governance

We believe that a commitment to the principles of environmental, social and governance (ESG) not only makes good business sense but also complements our Group business strategy and our corporate values. Our commitment to ESG extends across all our stakeholders from our people to our customers to our communities.

We aim to create an inclusive and supportive environment for our people to flourish and thrive. We take the health, wellbeing, safety and security of our employees as paramount to our operations, which is why it is one of the five pillars that govern our approach to ESG. This further extends to customers, our partners and the organisations we work with.

We are committed to taking meaningful action to tackle climate change by minimising our emissions and developing low carbon infrastructure and work to minimise and manage noise, protect air quality, and support the circular economy. For more information please see our [ESG Policy](#).

## Working in our communities

We aim to be responsible within the local communities that we operate in and work in partnership with our communities at all times. Our aim is to create sustainable, long-term opportunities in our communities to support social and economic development. We set out in our [Environment, Social and Governance Framework](#) how we will prioritise supporting sustainable communities as one of the five key pillars of our approach to ESG at Stobart Group.