



JLR

JLR SUPPLIER  
CODE OF CONDUCT



**BARBARA BERGMEIER**  
EXECUTIVE DIRECTOR, INDUSTRIAL OPERATIONS

JLR is transforming into a sustainability-rich, electric-first business. A modern luxury House of Brands founded on desirability, emotional engagement and exceptional vehicles and experiences, for our clients across the world. We are committed to ambitious Science Based Targets. Reducing our greenhouse emissions by 54 percent across our entire supply chain and operations chain by 2030 compared to levels in 2019. This journey of transformation impacts our suppliers by ensuring you are contributing positively to meeting our sustainability targets.



**TOBIAS MOCH**  
CHIEF PROCUREMENT OFFICER

This document defines the minimum requirements that you are to observe and meet as a supplier to JLR. This includes compliance with laws and regulations as well as with our actions to achieve our Reimagine strategy. We expect that these requirements are also passed on appropriately to your downstream partners in the supplier network.

We believe collaboration and cooperation with our suppliers is crucial to our success. Our sustainability performance can only be improved through continuous supplier engagement and management.

# CONTENTS

INTRODUCTION	4
BUSINESS ETHICS	5
HUMAN RIGHTS AND LABOUR STANDARDS	7
ENVIRONMENTAL STANDARDS	8
HEALTH AND SAFETY	9
TRANSPARENCY	9
SEEKING ADVICE OR RAISING CONCERNS	10





## INTRODUCTION

JLR is committed to upholding the highest standards of ethical conduct. Our approach to doing business in the right way includes standards of conduct relating to: human rights and labour; environmental sustainability; and health and safety.

JLR's Code of Conduct sets out our approach to doing business in the right way in accordance with our core values. Our Suppliers are an integral part of our business, and we want to partner with those who share our values.

JLR's Suppliers are required to provide safe working conditions, treat workers with dignity and respect, act fairly and ethically, and use environmentally responsible practices wherever they make products or perform services for JLR. JLR requires its Suppliers to operate in accordance with the principles of this JLR Supplier Code of Conduct ("the Supplier Code"), and in compliance with applicable laws and regulations. JLR also requires its Suppliers to operate in accordance with its Supplier Standards, including the JLR Global Sustainability Web Guide, which are available to JLR's Suppliers.

This Supplier Code is not intended to conflict with or modify the terms and conditions of any existing contract between JLR and a Supplier. In the event of any conflict, the contractual terms will prevail.

Where local law and the standards within this Supplier Code differ, the higher standard shall prevail. Where they are in conflict, we respect national law, while seeking to honour the higher standard.

JLR reserves the right to assess its Suppliers' compliance with this Supplier Code, and any violations of this Supplier Code may jeopardise a Supplier's business relationship with JLR up to and including termination.

### Scope

This Supplier Code applies to entities (hereafter individually referred to as "Supplier" or collectively as "Suppliers") providing products and / or services to JLR. This includes but is not limited to JLR's directly contracted Suppliers and their subsidiaries and affiliates, as well as any subcontractors and sub-tier Suppliers (each a Supplier for the purposes of this Supplier Code) providing goods and / or services to JLR or for use in or with JLR products and / or services.

## BUSINESS ETHICS

JLR is committed to conducting business in accordance with the highest ethical standards. This commitment underpins everything we do. We are committed to doing business fairly and transparently.

Mutual fairness and transparency are fundamental to our successful partnerships with others. We seek to do business with Suppliers that adopt clear standards of business conduct in line with our own. We require JLR's Suppliers and their supply chain partners to comply with all applicable laws and regulations.

### **Prevent Bribery and Corruption**

JLR Suppliers must not tolerate bribery or corruption in any form.

JLR Suppliers must not directly or indirectly offer, promise, pay, request or receive any inducements that are, or may be perceived to be, intended to obtain inappropriate influence in the course of their work with or for JLR.

### **Gifts and Hospitality**

Providing appropriate gifts and hospitality may help to build and maintain good business relationships. However, offering or accepting excessive gifts and hospitality may increase the risk of actual or perceived bribery and corruption.

Suppliers must respect that JLR Personnel are prohibited from offering or accepting excessive gifts and hospitality, and may only offer or accept gifts and hospitality in keeping with JLR's Gifts and Hospitality Policy.

We expect Suppliers who are offering or accepting gifts and hospitality in the course of their work with JLR to adhere with both the letter and the spirit of JLR's Gifts and Hospitality Policy.

### **Managing Conflicts of Interests**

We define conflicts of interests for JLR Personnel as any financial or other factor that may motivate behaviour that is not in JLR's best interests. We expect our Suppliers to avoid creating any conflicts of interests for JLR Personnel.

If our Suppliers have any conflict of interests relevant to their work with us, this must be disclosed to JLR so that any conflict can be appropriately managed.

### **Integrity in Financial Transactions**

Our Suppliers shall comply with all applicable laws and regulations relating to integrity and transparency in financial transactions. This expectation includes, but is not limited to, applicable laws and regulations relating to money laundering, proceeds of crime, fraud, tax evasion and insider trading / market abuse regulations.

### **Protecting Confidential Information**

Suppliers with access to intellectual property, data or other confidential information relating to JLR, our other Suppliers, our customers or employees must respect and protect all such information and data.

JLR Suppliers must not use non-public information gained in the course of their work with JLR to participate in any kind of insider trading and they must not assist others to derive any benefit from such information.

Our Suppliers must seek appropriate authorisation from JLR prior to sharing or disclosing any of JLR's confidential information, and at all times comply with contractual obligations relating to confidentiality. This applies to sharing or disclosing such information in any form, including via social media.

Suppliers collecting or using personal data or information in the course of their work with or for JLR must handle it responsibly and securely in accordance with their contractual agreements with JLR, and all applicable legal and regulatory requirements.

If Suppliers become aware of the loss, theft, destruction or unauthorised alteration or disclosure of any JLR related intellectual property, data or other confidential information then they must immediately report this to their JLR contact. Suppliers are required to provide any necessary support to JLR in connection with the investigation and resolution of such incidents.

### **Export Controls and Sanctions Compliance**

JLR requires its Suppliers to have measures in place to ensure compliance with sanctions that are levied on other territories or industries that may apply to Suppliers' business activities.

We require our Suppliers to ensure they are not conducting business with organisations, entities or individuals who are subject to sanctions ('Restricted / Denied Parties').

We expect our Suppliers to comply with all applicable international laws and regulations relating to Export Controls. Where required, Suppliers must provide JLR with up-to-date Export Controls information about their products and services in order for JLR and its business partners to comply with relevant international trade laws and regulations.

### **Competition and Antitrust Compliance**

We expect our Suppliers to uphold standards of fair competition. Our Suppliers must comply with all applicable antitrust / competition laws and regulations.

### **Integrity in Sales and Marketing**

Suppliers who undertake marketing or promotional activities for, on behalf of, or with JLR shall do so with integrity, without making unfair or misleading statements.

Suppliers who deal with JLR's end customers are expected to do so in a professional, fair and transparent manner.

### **Responsible Sourcing of Raw Materials**

JLR Suppliers must source raw materials and minerals responsibly, and are expected to demonstrate this through the design and implementation of a management system promoting supply chain traceability and transparency.

Suppliers should implement due diligence measures in accordance with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.



## HUMAN RIGHTS AND LABOUR STANDARDS

JLR is committed to promoting and respecting human rights. We want to work with others who share this commitment.

### **Child and Forced Labour**

JLR Suppliers must not engage in any instance of forced, bonded or compulsory labour, nor slavery or trafficking of people in the course of their business operations. Suppliers shall place the same obligations on their own supply chain and business partners.

JLR Suppliers must not employ, engage or otherwise use any form of child labour. Suppliers shall employ only workers who are at least 15 years of age, the applicable minimum legal age for employment, or the applicable age for completion of compulsory education, whichever is highest. Supplier may provide legitimate workplace apprenticeship programmes for educational benefit that are consistent with Article 6 of International Labour Organisation (ILO) Minimum Age Convention No. 138 or light work consistent with Article 7 of ILO Minimum Age Convention No. 138. Suppliers shall extend this expectation to their own supply chain and business partners.

JLR expects its Suppliers to provide a safe, inclusive and respectful workplace.

### **Abuse, Harassment and Unfair Discrimination**

JLR Suppliers must treat their workforce with dignity and respect. This expectation includes zero tolerance for any form of harassment, violence or threats, whether sexual, physical, verbal or psychological. JLR Suppliers must develop fair, transparent and clear employee policies which prevent unfair discrimination and promote diversity and equality, in accordance with applicable law and the provisions of this Supplier Code.

### **Respect freedom of association and collective bargaining**

JLR Suppliers shall allow workers to communicate openly with management regarding working conditions and management practices without fear of reprisal, intimidation, or harassment and respect workers' rights to associate freely, to join or not join labour unions, bargain collectively, seek representation, and join workers' councils.

### **Working Hours**

JLR Suppliers must comply with applicable laws and regulations regarding working hours or in the absence of such laws and regulations, the ILO standards on working time.

### **Wages and Benefits**

JLR Suppliers must provide their workers with remuneration that is adequate to cover basic needs and enable a decent standard of living for the workers and their families; this includes respecting minimum wages, overtime compensation, medical leave and government mandated benefits. For JLR Suppliers in countries that mandate a minimum wage, all employees must be paid at least that applicable minimum wage.

### **Ethical recruiting**

JLR Suppliers must not mislead or defraud potential workers about the nature of the work, ask workers to pay recruitment fees, and / or confiscate, destroy, conceal and / or deny access to workers' passports and other government issued identity documents. Workers must receive a written contract at the start of their recruitment in their native language, stating in a truthful, clear manner their rights and responsibilities.

JLR Suppliers shall promote a culture of diversity and equality, where everyone is able to contribute fully and reach their full potential. JLR suppliers should strive for diversity at all levels of workforce and leadership, including boards of directors.

Our Suppliers shall provide equal opportunities for women in employment and commit to equal pay for equal work.

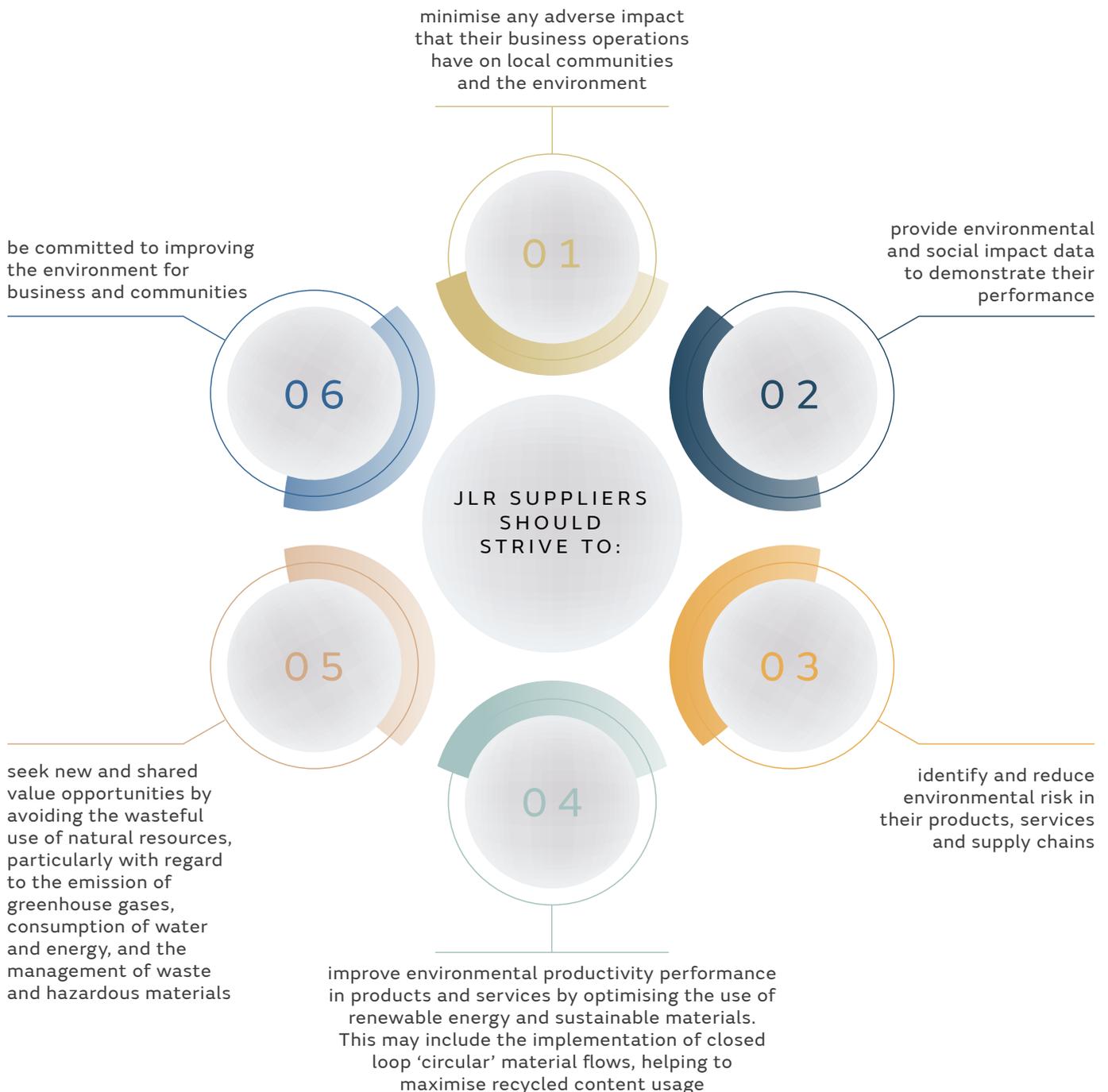
### **Rights of Minorities and Indigenous peoples**

JLR Suppliers shall respect the rights of local communities to decent living conditions; education, employment, social activities, and the right to Free, Prior, and Informed Consent (FPIC) to developments that affect them and the lands on which they live, with particular consideration for the presence of vulnerable groups.

## ENVIRONMENTAL STANDARDS

JLR is committed to responsibly managing the environmental impact of our business operations. JLR strives for environmental sustainability across our value chains, and in some cases, relies on its Suppliers to help deliver JLR's own sustainability targets. JLR seeks to partner with those who share its vision of advancing environmental innovations.

JLR has committed to reduce its greenhouse gas emissions through the Science-Based Targets initiative (SBTi). JLR expects its Suppliers to strive for progressive and continuous improvements in environmental sustainability in the production and sale of their products and services and to comply with all applicable environmental laws and regulations. JLR Suppliers should determine the material environmental impacts resulting from their operations and from creating their products and services, commit to systematically reducing those impacts and, where required, commit to sustainability targets approved by the SBTi.



## HEALTH AND SAFETY

JLR is committed to a healthy and safe working environment.

JLR Suppliers must comply with all applicable health and safety laws and regulations and never compromise safety in the pursuit of commercial advantage.

JLR Suppliers should provide a working environment that meets or exceeds local and national safety, occupational health, and fire safety legislation and provide appropriate training and education to their workforce to mitigate known risks and hazards.



## TRANSPARENCY

JLR is committed to a transparent and sustainable value chain.

Suppliers must support JLR's efforts to develop supply chain traceability to further our assessment and mitigation of sustainability risks. Sharing supply chain traceability data will enable full transparency across our shared value chains and underpin effective risk management and build resilience for JLR and our partners.

## SEEKING ADVICE OR RAISING CONCERNS

If you require advice on this Supplier Code of Conduct, please contact the JLR Group Compliance & Ethics department at **Group.Compliance@jaguarlandrover.com**.

We encourage JLR Suppliers and other stakeholders to raise concerns if they become aware of any actual or potential violation of our Code of Conduct, Corporate Policies or laws relevant to your relationship with JLR. You can raise concerns by contacting **Group.Compliance@jaguarlandrover.com**.

Alternatively, you may use the JLR Confidential Reporting facility by accessing **<https://jlrspakeup.ethicspoint.com>** or calling the UK reporting line, **0800 048 5871**. This facility is operated by an independent external service provider to protect confidentiality.

