Anti- Slavery & Human Trafficking Policy Statement

Policy Owner: Legal Department
Approved By: CEO
Effective Date: November 2019
Review Date: November 2020
This document represents the Formula E Group* (hereinafter “The Company” or “Formula E” or “We”) Anti-Slavery and Human Trafficking Policy for the Financial year ending 31st July 2019.

1. **Introduction**

1.1 Formula E is the world’s first fully electric single-seater motorsports racing series. The Company provides operational and commercial management of the motorsport in connection with the ABB FIA Formula E Championship and its events under the long-term agreement entered into with the Federation Internationale de l’Automobile (“FIA”).

1.2 The Company understands modern slavery can take many forms including but not limited to human trafficking, forced labour, slavery and servitude (“Modern Slavery”).

1.3 The Company recognises the importance of ensuring Modern Slavery finds no place within it or in its supply chain. Formula E is committed to make its approach to Modern Slavery transparent in line with the obligations set forth under the Modern Slavery Act 2015 (“MSA”) and, expect its employees, suppliers and promoters to act according to Formula E standards in relation to this. The obligations set forth under the MSA are contemplated by Formula E as the minimum standards required to its employees, suppliers and promoters (“Modern Slavery Standards”).

1.4 This Policy does not form part of any individual’s employment contract with the Company, and Formula E, at its discretion, reserve the right to amend it if necessary.

*Formula E Group includes all companies within the group structure, including Formula E Holdings Ltd, Formula E Operations Ltd, Formula E Rights BV, Formula E Race Operations Ltd, Formula E Chile SPA, Formula E Mexico SA, Formula E Enterprise Inc.*

2. **Policy Statement**

2.1 As a Company, Formula E condemns Modern Slavery and refuses to conduct business with any persons or companies involved in it or who condone such practices.

2.2 Formula E values diversity and prides itself in having high ethical standards in the conduction of its business. Formula E fully supports the UK Government’s objectives behind the MSA and this statement affirms Formula E intention to act ethically in all business conduct and with our business relations.

2.3 We expect everyone who works for Formula E or on its behalf or, is in partnership with Formula E in any capacity to have a zero-tolerance towards Modern Slavery.

2.4 We undertake checks on all our employees prior to the beginning of their employment within Formula E. This includes checking that the employee has a valid work visa and is of an appropriate age to work.

2.5 We are committed to train our employees in order to (i) acknowledge and understand the principles of Modern Slavery, including the Modern Slavery Standards, and (ii) be able to identify and recognize the modern slavery practises within the day-by-day working routine. All Formula E employees are required to report any known or suspected breaches of this policy and/or Modern Slavery Standards to their line manager or to the HR Director as soon as possible.

2.6 As part of this statement, Formula E will outline a Modern Slavery & Human Trafficking action plan to be in place for the year ahead in order to help continually improve Formula E group’s ethical employment standards and to constantly comply with the Modern Slavery Standards. Performance against this action plan will be noted and reviewed on an annual basis, any emerging risks have to be noted and tackled through dedicated action plan in order to minimise any Modern Slavery risks.
3. **Our Supply Chain**

3.1 The Company outsources a range of goods and services to suppliers across the world during the organisation of the racing Events. Formula E ensures from the beginning of its outsourcing that every party involved in its supply chain is aware of its Modern Slavery Standards and is committed to fully adhere to such Modern Slavery Standards.

On an annual basis, the Company will conduct a Supply Chain Risk Assessment to identify the elements of the business where the greatest risks of Modern Slavery are identifiable. Our Season 2019/2020 ("Season 6") risk assessment, involving the Internal Auditor, Chief Finance Officer, Chief Legal Officer, Finance, Legal and HR departments identified the following as areas requiring monitoring, review and action proportionate to the following assessed level of risk:

3.1.1 **Global TV and Electronic Event Infrastructure**

There are several global partners Formula E works alongside to deliver electronic data and tv content to the Formula E internal environment and to the worldwide broadcasters and websites. The companies falling within this category and having a turnover of £36m-plus shall be considered to have a **high-level risk of Modern Slavery Act compliance** and are required to submit an Ethical Employment Standards Questionnaire.

Once responses from this questionnaire are received, Formula E conducts a more detailed audit review and discusses the application of specific Key Performance Indicators in order to monitor and manage the resulting Modern Slavery Act compliance risks.

3.1.2 **Event Construction Contractors and Agency Staff**

In the organization of motorsport events in worldwide city centres, Formula E appoints several contractors to undertake the construction and the derig of the racetrack, paddock, grandstands and trackside event and entertainment. The Company recognises these contractors may have a high-level risk of Modern Slavery Act Compliance, particularly in those countries bound by less stringent employment regulations than the European Union and North America.

We require under the Formula E Procurement Process a full disclosure of (i) such contractors source agencies and (ii) their employment standards. In those cases where the direct contact of such contractors is assumed directly by a promoter or a local operator, the responsibilities for compliance with Modern Slavery Standards are defined and regulated under the respective agreements.

Formula E directly, all by delegation of authority through promotors and or local operators, requires all existing and new suppliers to submit an ethical employment standards questionnaire as part of the Formula E Pre-Qualification Questionnaire ("PQQ") provided under the Formula E Procurement Process.

Furthermore, Formula E, on a risk-based assessment, may undertake audits to its contractors and agency staff both directly and indirectly appointed by Formula E. An audit takes place also in relation to the suppliers contracted for one event only during the season.

Formula E risk assessments have identified ‘high or ‘very high’ MSA risks in relation to Office/ Agency Staff in one territory and Construction/ Site Crew Suppliers in three territories where Formula E stages its races.

3.1.3 **Local Promoters**

In the organization of the motorsport championship around the world, Formula E may appoint a local promoter (the "Promoter") to (i) organise, (ii) promote the race event in the territory where the event is held, and to (iii) commercialise the commercial and media rights associated to the event. In such cases it is provided under the relevant local promoter agreement that the Promoter
has to fully comply with the Modern Slavery Act and it has to conduct its businesses in a manner that is consistent with the Modern Slavery Standards and that it has to confirm that any supplier contracted directly by the Promoter fully comply with the Modern Slavery Act and conducts its businesses in a manner that is consistent with the Modern Slavery Standards.

We also undertake careful due diligence on the financial and ethical performance of the Promoter before a final decision on their appointment is taken.

The Company is committed to build long-term relationships with its Promoters as part of its due diligence process in line with its obligations under the MSA.

3.1.4 Local Operators

In the set-up of the race events around the world, Formula E may assign to local operators (the "Operator") the procurement and supervision of certain services needed for the realization of the event. Within this process, Formula E requires the disclosure of the Operator's source agencies and their employment standards as a standard information request under the Operator's agreements.

In such cases it is provided under the relevant operator agreement that the Operator has to fully comply with the Modern Slavery Act and it has to conduct its businesses in a manner that is consistent with the Modern Slavery Standards and that it has to confirm that any supplier contracted directly by the Operator fully comply with the Modern Slavery Act and conducts its businesses in a manner that is consistent with the Modern Slavery Standards.

We also undertake careful due diligence on the financial and ethical performance of the Operator before a final decision on their appointment is taken.

Within its local operator agreements Formula E also provides the right to audit such Operators in respect of their compliance with the Modern Slavery Standards.

3.2 Employment of permanent and temporary Formula E staff members is conducted either directly or through respected UK agencies and is considered minimal risk. The HR Director is responsible for ensuring all UK employment legislation is complied with and all of our employees are paid above UK minimum wage. All internships are compliant with UK employment legislation.

If any party which makes up part of Formula E’s supply chain knows or has reason to suspect that Modern Slavery exists or will exist in the future, or that this Policy is being or will be breached, they are expected to report this to the Internal Auditor: James Bentley (jbe@fiaformulae.com) or the HR Director: Stuart Allan (sa@fiaformulae.com).

4. Training and Communication

4.1 All new employees attend a training session on Anti-Bribery & Corruption (ABC) and every employee and board member is required to annually complete an ABC compliance statement. Commencing from 2018/19 the company governance training was expanded to incorporate Modern Slavery awareness and all employees are required to complete an MSA compliance statement.

4.2 This Policy Statement will be made available to all staff via the internal policy depository and made accessible to any external stakeholders via the website.

5. Responsibility for this Policy

5.1 The Company’s directors have approved this policy statement and shall take overall responsibility for it.
5.2 This policy statement shall be reviewed by the Internal Auditor on an annual basis, in co-ordination with Chief Finance Officer, Chief Legal Officer, Legal, Procurement and HR departments, to ensure it is fully effective in countering Modern Slavery and also dealing with any queries relating to it.

5.3 All line managers are responsible for making sure that employees reporting to them fully understand and comply with the Policy. This includes being responsible for ensuring any suggested improvements are incorporated into the Policy if such changes will increase its effectiveness.

6. Breaches of this Policy

6.1 Any employee who knowingly, directly or indirectly, employs staff who are subject to non-ethical working conditions, will face disciplinary action at the discretion of the Company. This could include dismissal for misconduct.

6.2 If the Compliance Officers conclude that a third party is falling short of the standards outlined in this policy, the Company may terminate any relationship with such third party.

7. Action Plan

7.1 To demonstrate ongoing improvement in managing and reducing Modern Slavery risks, Formula E has set an action plan for Season 6 which is outlined in Appendix B.

7.2 Performance against this action plan will be reviewed on an annual basis with assurances given to the Compliance Officers to demonstrate how effective the business has been in mitigating the identified risks.

7.3 New actions will be set following this annual review in response to emerging risks.

Signed:

[Signature]

Name: Jamie Reigle
Title: CEO
Formula E Group
Date: 19th November 2019
### Appendix A: Action Plan Delivery - Season 5 (2018/19)

<table>
<thead>
<tr>
<th>Action Area</th>
<th>Action</th>
<th>Ownership</th>
<th>Date of Implementation</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policies &amp; Contracts</td>
<td>Review this Policy Statement and ensure the SMT approves its content and is satisfied with the implementation of the previous year's action plan.</td>
<td>CEO/ CFO</td>
<td>30/09/2018</td>
<td>Implemented</td>
</tr>
<tr>
<td>People</td>
<td>Modern Slavery &amp; Human Trafficking awareness added to e-Learning portal alongside Anti-Bribery &amp; Corruption training for completion by all FE employees.</td>
<td>Internal Auditor</td>
<td>30/09/2019</td>
<td>Implemented</td>
</tr>
<tr>
<td></td>
<td>Modern Slavery &amp; Human Trafficking Policy statement to be included in Governance documents to be signed by all employees.</td>
<td>Internal Auditor</td>
<td>30/09/2019</td>
<td>Implemented</td>
</tr>
</tbody>
</table>
| Supply Chain        | Ensure the ‘ethical employment standards’ questionnaire is distributed to all existing suppliers under the following supplier types:  
  ▪ Vehicle Construction and Maintenance;  
  ▪ High risk Event Construction Contractors and Agency staff;  
  ▪ Local Promoters and Operators;  
  ▪ Global Event Infrastructure suppliers which may have a £36m+ turnover.  
  Identify, monitor, review and manage the risks in relation to the responses received. | Procurement Department Lead | | Partially Implemented |
|                     | Undertake a formal audit review of at least one key supplier in each of the above supplier types to provide assurance to the Board that the risks of Modern Slavery are being minimised. | Internal Auditor      | Superseded by S6 Supply Chain audit approach | Not Implemented      |
|                     | Conduct a risk assessment of identified, new and emerging supply chain risks to determine scope of action plan for 2019/20. | Internal Auditor      | 30/09/2019             | Implemented          |
## Appendix B: Action Plan - Season 6 (2019/20)

<table>
<thead>
<tr>
<th>Action Area</th>
<th>Action</th>
<th>Ownership</th>
<th>Target Date</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policies &amp; Contracts</td>
<td>Review this Policy Statement with SMT and CEO to ensure its content is approved and all parties are content with the implementation of the previous year’s action plan.</td>
<td>CEO/ CFO/ HR Director/ Finance Director</td>
<td>01/11/2019</td>
<td>Implemented</td>
</tr>
<tr>
<td>People</td>
<td>Modern Slavery &amp; Human Trafficking awareness e-learning to be completed by all FE employees.</td>
<td>Internal Auditor</td>
<td>30/11/2019</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Modern Slavery &amp; Human Trafficking Policy statement to be signed off by all employees.</td>
<td>Internal Auditor</td>
<td>30/11/2019</td>
<td></td>
</tr>
</tbody>
</table>
| Supply Chain      | Ensure that, as part of the PQQ process, the ‘ethical employment standards’ questionnaire is distributed to all new suppliers under the following supplier types:  
▪ Global TV and Electronic Event Infrastructure which may have a £36m+ turnover;  
▪ Event Construction Contractors and Agency Staff;  
▪ Local Promoters;  
▪ Local Operators.  
Identify, monitor, review and manage the risks in relation to the responses received. | Procurement Department Lead | Ongoing |          |
|                   | Collate all MSA questionnaire responses and create an analysis which will help identify, monitor, review and manage the risks in relation to the responses received. | Procurement Department Lead/ Internal Auditor | 31/01/2020 |          |
|                   | Use risk assessment of identified new and emerging supply chain risks to determine scope of action plan for 2019/20 and undertake a formal audit review of key suppliers in each of the highest risk areas to provide assurance to the Board that the risks of Modern Slavery are being minimised. | Internal Auditor                   | 31/07/2020 |          |