



PRIORITISING POSITIVE CHANGE: OUR ESG GOALS, INITIATIVES AND ACTIONS

At Inchcape Shipping Services (ISS), we believe we have an obligation to use our global network to connect to a safer and more sustainable future.

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1. ABOUT THIS REPORT

For many years, Inchcape Shipping Services has set high standards for corporate responsibility and a quality service delivered through our Code of Conduct, with a clear mission and vision, and high ethical standards and values.

We have a strong market position with a leading global network – but the world keeps moving forward. We need to evolve as corporate responsibility and sustainability are more important than ever.

In Q4 2024, the ISS ESG Strategy Team conducted its first Double Materiality Assessment (DMA). This was to strengthen our approach to ESG by framing existing efforts through the lens of a DMA. It has helped us articulate a clearer way to communicate around ESG efforts with our customers and within our organisation.

We focused on our business value chain and stakeholders, then looked at key environmental, social and governance topics, and scored these based on the impacts and risks connected to the topic, the degree of control Inchcape has, and stakeholder perspectives.

These results were then consolidated into a matrix, which was used to articulate objectives and initiatives around each key topic.

The results of the (DMA) have guided us in publishing our first collective *Responsibility and Beyond Report*. This report shares the progress we have made, our vision for the future, and the actions we need to take to achieve our ambitions.

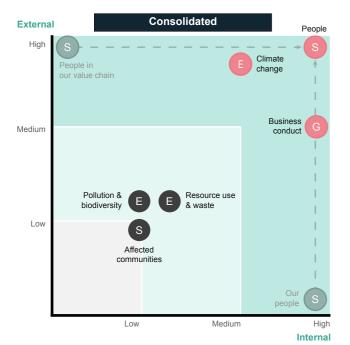




2. DOUBLE MATERIALITY

ASSESSMENT

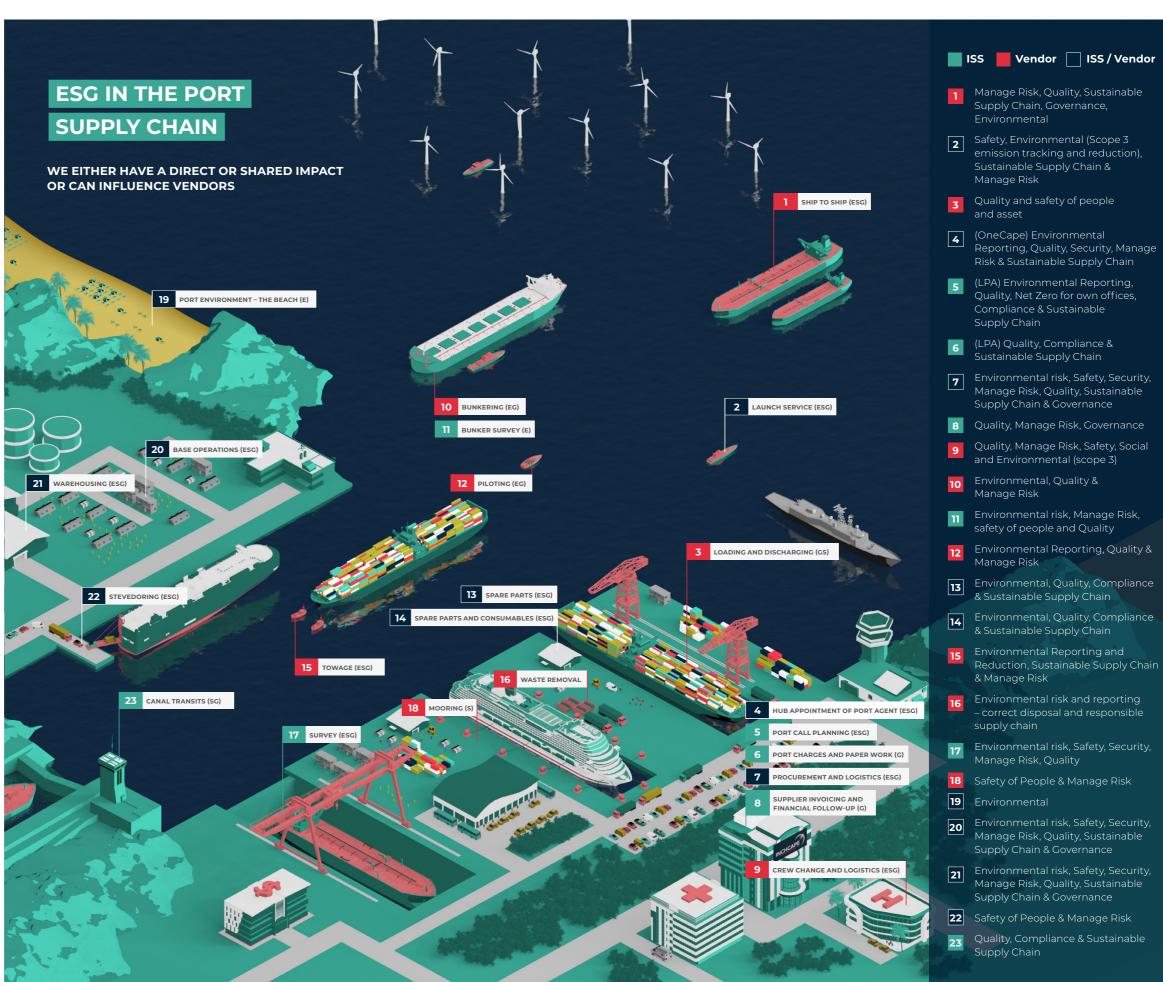
We took a deep dive into our value chain through internal workshops and external stakeholder interviews; this determined the best approach to assess topics would be using an external and internal assessment framework. The approach enabled us to link our ESG activities to what our customers are doing and gives us the greatest opportunity as a global port agency and marine services provider to support them with their own decarbonisation journey.



DMA CONSOLIDATION

Overall external materiality and internal materiality scores for each topic were consolidated by adding the scores of three assessment criteria:

- Severity of impact/risk,
- Control, and
- Stakeholder views.



Supply Chain, Governance,

emission tracking and reduction),

Reporting, Quality, Security, Manage

Risk & Sustainable Supply Chain

Quality, Net Zero for own offices,

Manage Risk, Quality, Sustainable Supply Chain & Governance

and Environmental (scope 3)

safety of people and Quality

- correct disposal and responsible

Supply Chain & Governance

Supply Chain & Governance

Manage Risk

supply chain

Supply Chain

Compliance & Sustainable

Sustainable Supply Chain

3. OUR RESPONSIBILITIES

OUR ESG COMMITMENT

RESPONSIBLE ACTION, MEASURABLE IMPACTConnecting to a safer and more sustainable future

		INTERNAL FOCUS We run our business responsibly		EXTERNAL FOCUS We enable our customers to run their business responsibly	
ш	OBJECTIVES	We ensure everyone goes home safely at the end of the day. We share lessons from incidents and empower employees to stop work for safety concerns.	GREAT PLACE TO WORK AND GROW We aspire to be a great place for people to contribute and develop new capabilities.	HUMAN/LABOUR RIGHTS We ensure that we comply with the law and endeavour to reduce human/labour rights issues in our industry.	We work to ensure that customer and Industry safety standards and requirements are delivered on the ground.
PEOPLE	INITIATIVES	 Create a step change in our safety culture via Stay Safe 360° programme. Conduct annual HSSE management reviews aligned with ISO 45001. Drive incident reporting to create a culture of learning. 	 Create equal opportunities for all our people. Collaborate to build future-ready skills. Improve local communities where we operate. Promote wellness to support work-life balance. 	 Modern Slavery Act compliance. Counterparty screening. 	Engage high-risk vendors on PQQs and incident management, sharing of best practices.
ENVIRONMENT	OBJECTIVES	COMPLIANCE / REPORTING We fulfil our legal obligations to ensure that all country-appropriate environmental laws and regulations are met.	CLIMATE CHANGE We support the transition to a lower carbon economy and will be net-carbon zero by 2050 or as soon as technically and economically practicable thereafter.	CLIMATE CHANGE We help our customers and vendors to become more sustainable by providing optionality and delivering a sustainable supply chain.	POLLUTION & BIODIVERSITY We help customers to comply with pollution and biodiversity requirements and give them visibility on more sustainable options where available.
	INITIATIVES	Fulfil ESG legal obligations.	 Develop a roadmap to help us achieve Net Zero by 2050. 	 Understand our industry and use external insights participate in industry fora. Support our customers and vendors to become more sustainable. 	Support customers, comply with regulations and provide options to reduce fuel consumption through use of our service.
SS CONDUCT	OBJECTIVES	ABC/TRADE/OTHERS We ensure that not only do we comply with the law but go above and beyond to ensure our customers' standards are adhered to through stringent compliance checks and other controls.	We encourage and recognise the need to speak up in any unsafe or un-compliant situation.	SPEAK UP We encourage and recognise the need to speak up in any unsafe or un-compliant situation.	ABC/TRADE/OTHERS We promote integrity in a complex industry and believe this is key to our success.
BUSINESS	INITIATIVES	 Compliance with Code of Conduct. Ensure compliance with standard policies, procedures and controls. 	Provide a speak-up line for employees.	Provide a speak-up line for third parties.	 Drive industry standards via partnership with the Maritime Anti-Corruption Network. Maintain a Code of Conduct for vendors.

We need to understand what the issues are that matter most to us and our customers, our position in the value chain, our impact, and where we can focus our resources to have the biggest effect as a global organisation in the maritime industry.

For a company of our size and reach, it is more important than ever that we establish and communicate our ethos through a simple and transparent framework. As a company we will:

- Comply with the law, standards and procedures.
- Act with integrity and transparency and speak up in any unsafe or non-compliant situation.
- Care for and protect each other, our business, our customers, the community, and our environment to build a sustainable, profitable and growing enterprise.

As a result of the DMA, we have identified three pillars where we believe we can make the most impact:

- 1. People including (Safety and Compliance)
- 2. Environment
- 3. Business conduct

Through our three pillars, we will better focus our actions as a responsible business that meets the highest standards of ethics and professionalism. We will drive this strategy through education, leading by example, and doing the right thing.

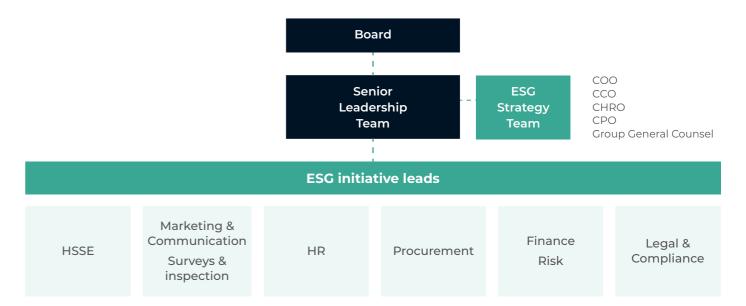
Note: Our pillars apply to our company and its subsidiaries, as well as our duty of care towards our vendors and customers.

RESPONSIBILITY TO OUR INDUSTRY

Today's maritime industry is fast evolving to become one of the most global, highly regulated and socially conscious industries of its time. Intergovernmental bodies and other UN agencies are introducing increasingly stringent legislation and policies that promote the protection of the world's natural environment.

The maritime industry is transforming, both in the private and public sectors, to align profitability goals with preserving Earth's natural resources, and to ensure we deliver on our ESG commitments through a robust framework and action plan.

4. ESG GOVERNANCE STRUCTURE



The board has overall responsibility of the ESG strategy. They have assigned the execution and management of the objectives to the ESG Strategy Team.

360

5. THREE PILLARS OF RESPONSIBILITY

PILLAR 1 - PEOPLE

PEOPLE and relationships are the core of our business and are our greatest assets. We aspire to be a great place for people to contribute and develop new capabilities. We want to create a diverse global community that is engaged, adaptable and innovative, enabling positive change internally and within our industry.

United by our shared values, we harness the passion, commitment and expertise of our people to deliver the exceptional service our customers deserve.

INITIATIVES

Safety

- Create a step change in our safety culture via the Stay Safe 360° programme.
- Conduct annual HSSE management reviews aligned with ISO 45001.
 - Drive incident reporting to create a culture of learning.

Safety Leadership and commitment starts at the top at ISS and is supported through our HSSE Management system and action plan to deliver on our strategy, thereby reducing the risk of harm to our people and the environment.

Our global network of port agents and employees are the eyes and ears of our customers, ensuring that ISS, customer and industry safety standards and requirements are delivered on the ground.

Across ISS, employees are equipped with mandatory HSSE training, which reinforces the important role each person plays in ensuring the safety of themselves and those around them. Through our Visible Felt Leadership Tours (VFLT), we track safety leadership and incorporate in our suite of leading and lagging safety indicators.

As a learning organisation, we constantly seek to improve our reporting culture, including accidents and near misses. We investigate our incidents and learn from our mistakes, taking human factors into account. Any learnings are systematically embedded in processes, regular HSSE campaigns, training and systems, to ensure a cycle of continuous improvement.

As part of this drive for continuous improvement, we are working towards an Integrated HSSE Management System to ensure we comply with legal and ISO requirements, and meet corporate objectives across the areas we operate. This will provide assurance that our people know their safety and compliance responsibilities, and how to meet them.

STAY SAFE 360° PROGRAMME OBJECTIVES

Take care of our customers

Ensure we meet the needs and expectations of our customers by aligning our HSSE standards with theirs:

- Safe transits for your crew.
- Track and investigate our incidents using digital technology ensuring we learn from our mistakes.
- Compliance to contract.
- HSSE policy commitment.

Take care of our people

To minimise potential harm to people and the environment, and to ensure employees embed a positive safety culture in their day-to-day work activities:

- Occupational health and employees wellbeing.
- HSSE management system.
- Risk and incident management.
- Visible felt leadership tours.

Safety-minded vendors

Enhance the HSSE standards of our vendors and subagents through proactive HSSE assurance prequalification processes:

- Vendor HSSE management.
- HSSE Assurance prequalification.
- HSSE Launch assessment.
- Quarterly vendor and subagent workshops.

Great place to work and grow

• Create equal opportunities for all our people.

We believe diverse teams strengthen us and drive positive business results. Our aim is to foster an inclusive workplace where everyone feels valued and respected. A workforce that is diverse in terms of gender and ethnicity brings a multitude of perspectives, fostering innovation and creativity. This diversity helps in understanding and catering to our broad customer base, enhancing customer satisfaction and loyalty.

Moreover, an inclusive work environment boosts employee morale, reduces turnover rates, and attracts top talent from various backgrounds. We've achieved 32% gender diversity with women and represent more than 74 nationalities in our workplace. We recognise that we still have work to do and will undertake several strategies:

- Inclusive recruitment practices: ensure that job postings reach a wide audience by advertising in diverse platforms and communities. Our recruitment process is designed to minimise biases, with diverse interview panels and standardised evaluation criteria to ensure fairness.
- Employee resource groups: support the creation of ERGs that provide a platform for employees to connect, share experiences, and advocate for inclusive policies.
- Employee wellness programmes: support the overall well-being of our employees through comprehensive wellness programmes. These include mental health resources, fitness and nutrition.

ALIGNMENT WITH UNSDGS

- UNSDG 4 (quality education): Ensuring inclusive and equitable quality education and lifelong learning opportunities.
- **UNSDG 5 (gender equality):** Achieving gender equality and empowering all women and girls.
- UNSDG 8 (decent work and economic growth): Promote sustained, inclusive and sustainable economic growth, full and productive employment, and decent work for all.
- **UNSDG 10 (reduced inequalities):** Reducing inequality within and among countries.



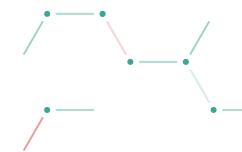
• Collaborate to build future-ready skills.

As we look ahead, we recognise that the maritime industry will require a diverse set of skills, including proficiency in digital technologies, data analytics, and environmental sustainability practices. We recognise that development of new skills is becoming increasingly crucial for our workforce, customers, suppliers, and the wider industry.

There are many and various benefits of preparing our workforce for the future. For employees, acquiring these future-oriented skills enhances their career prospects and job satisfaction, fostering a sense of growth and progression. For our business, a well-trained workforce drives innovation, operational excellence, and competitiveness, positioning us as a leader in the sector. For our customers, the assurance of working with a forward-thinking company that prioritises efficiency, sustainability, and reliability translates to superior service and strengthened partnerships.

By fostering collaboration with our partners, we will ensure that the workforce is well-equipped to meet emerging challenges and seize new opportunities. We will undertake several strategies:

 Joint training programmes: collaborating with customers and suppliers to design and deliver training sessions that cover essential topics. By pooling resources and expertise, these programmes can provide high-quality training that benefits all stakeholders.



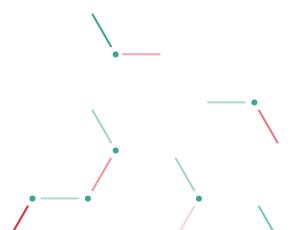
- Internship programmes: developing a pipeline of skilled port agents is crucial for the future of our industry. Internship programmes, created in partnership with customers and suppliers, will provide practical training and real-world experience to new entrants.
- Strategic partnerships with educational institutions: forming strategic partnerships with universities, colleges, and vocational schools can enhance skill development efforts. We will work with these institutions to access and shape curricula that align with industry needs.
- Engagement in industry associations and forums: actively participating in industry associations and forums, we will contribute to industry standards, and access professional development resources.

The development of future skills in our industry requires a collaborative approach. By working closely with customers, suppliers and institutions, we aim to build a skilled workforce that drives innovation, operational excellence, and sustainable growth.

• Improve local communities where we operate.

We are proud to have offices in 60 countries and we care about our local communities. Supporting the local communities where we operate is a key part of our corporate values. By investing in community development, we create positive changes that benefit everyone. Engaging with local communities is crucial for sustainable development. It helps meet local needs, reduces inequalities, and builds trust between our organisation and the community.

It also leads to happier employees, as we know our staff feel more motivated and engaged when contributing to a good cause. Additionally, it helps us to attract talent, as a socially responsible reputation draws top talent who want to work for a company that shares their values. By building strong relationships with local communities, we fulfil our social responsibilities and pave the way for long-term success.



When communities thrive, everyone benefits, including our business. In view of this, we will undertake several strategies:

- Employee volunteering: encouraging our employees to volunteer in local community projects not only helps those in need but also fosters a sense of purpose and engagement within our workforce. We will organise regular volunteering events and offer paid time off for employees who participate.
- Local hiring and training: hire and train employees from our local communities to provide economic opportunities and skill development, while also ensuring our business benefits from a workforce that understands the local context and needs.
- Environmental initiatives: implementing and supporting environmental sustainability projects, such as tree planting, recycling programmes, and clean energy initiatives, can improve the quality of life in local communities and help us meet our sustainability goals.

By employing these strategies, we will create meaningful and lasting positive impacts on the local communities where we operate.

SHOWCASE

ISS is a proud supporter of the Ananda Marga Children's Home in Kiembeni, Mombasa. Situated 15 km north of Mombasa Island, the Ananda Marga Academy of Kiembeni strives to provide a holistic education to children from nursery through to the eighth year of primary. Founded in 1990, the school's initial aim is to offer a good pre-school foundation for the children of the orphanage, which is located on the same compound.



ACTIONS Safety

	What we will do	How we will measure it	What next in 2025
Safety	Create a step change in our safety culture via Stay Safe 360° Programme.	 Deliver our HSSE metrics and milestones: Focus on Zero Harm. Increase reporting on near misses, observations, and incidents. As per ISS Scorecard. 	Focused quarterly HSSE campaigns.
	HSSE Management Review	Carry out annual HSSE management reviews aligned with ISO 45001.	Complete Q4 2024.Aspire to ISO45001.
	Create a culture of learning	Ensure visible leadership at site.	Launch at Q4 HSSE management review.
	Engage high-risk vendors on pre-qualification questionnaires and incident management, sharing of best practices.	Digitally track actions and monitor progress.	Expanding the Salesforce tool to include additional HSSE reporting indicators (e.g. VFLT and HSSE observations).



ACTIONS

A great place to work and grow

	What we will do	How we will measure it	What next in 2025
Creating equal opportunities for all our people	Provide training for our hiring managers in recruitment and selection techniques that support equal opportunity.	 Track completion of hiring manager training. 100% completion by end 2025. Applicant responses from post-interview survey (4.0+). 	 Deploy mandatory Hiring Manager training module. Deploy post-interview survey for applicants.
	Offer flexible working options and promote wellness to support work-life balance.	Survey and feedback sessions to gauge employee satisfaction with flexible working and wellness support (70%).	Promote flexible working options and wellness programmes.
Collaborate to build future-ready skills	Collaborate with our key customers and suppliers to develop training programmes that will promote future-ready skills.	Track completion of future- ready skills programmes (two programmes by end 2025).	Engage with selected partners to develop and pilot a relevant future-skills programme.
	Collaborate with selected institutions to create internship programmes to provide practical training and real-world experience.	Track completion of intern programme (two institutes with five interns).	Engage with selected institutions to develop and pilot local intern programmes.
Improve the local communities where we	Plan group volunteering activities at local level, such as community clean-ups, food drives.	Track participation rates in volunteering activities (number of hours – 2 hours per employee per year).	Deploy a time-off policy to enable employees to participate in volunteer and community development activities.
operate	Coordinate with local community groups to participate in training and mentoring programmes that equip local communities with new skills.	Track participation rates in community development activities.	



PILLAR 2 – ENVIRONMENT

Inevitably, our operations do have an environmental impact. ISS have an obligation to our people and the communities where we operate to protect the natural environment through minimising our own emissions.

We must also ensure that throughout our own operations, and as a key part of our customer's supply chain, we understand and rise to the challenge of this developing landscape and ensure we do the right thing.

Working with an external industry-leading environmental consultant (Deloitte), we have developed a suite of prioritised and clearly defined initiatives to set our direction.

INITIATIVES

Compliance/Reporting

• Fulfil ESG legal obligations.

Our employees, sub-agents and vendors must fulfil legal obligations to ensure that all country-appropriate environmental laws and regulations are met.

Climate change

• Develop a roadmap to help us achieve Net Zero by 2050.

Where are we today?

We are currently in the final phase of establishing baselines across our network so we can begin to measure and plan for reduction from 2025.

Scope 1 – Emissions produced directly by Inchcape

 Inchcape is a service company and therefore assetlight. Key contributors to our Scope 1 emissions are our fleet of launch boats in the Middle East, our company vehicles, and machinery operating in our container storage facility in Kenya. A key part of our journey to net zero is tracking and reducing our emissions.

Scope 2 – Emissions produced indirectly through purchased energy

 Emissions are linked to the operation of our 260 offices, located in more than 60 countries across the globe. In addition, we operate warehouses and similar facilities in a number of key port locations.

Scope 3 – Emissions produced indirectly by our value chain

- Scope 3 emissions contribute around 80–90% of the total and spread across multiple categories.
 A significant proportion of these come from our global network of suppliers who support us in providing our service offering to our customers.
- Our supply base is split into more than 50 categories, each contributing its own level of emissions. A lot of work has already been done to track and measure CO₂ emissions from the highest contributors, namely launches, taxis, and hotels. This data is proving extremely valuable in our journey to reduce emissions and to get a view on how focused our global supply chain is on sustainability and emissions reduction.
- Business travel, employee commutes, and waste generated in our day-to-day operations is monitored, and we constantly strive to minimise travel and look at reduction/offsetting strategies.
 - Understand our industry and use external insights participate in industry fora.

We voluntarily commit to work towards and in accordance with ISO 14001 and the 17 UN Sustainable Development Goals, and the Worker Welfare Management Plan. We also subscribe to a number of environmental programmes to have a deeper understanding of our ESG performance. These results enable us to prioritise our efforts.

- 1. Net Zero 2050 we will understand where we are on our journey and develop a roadmap to get us to our target in a sustainable and manageable way.
- 2. ECOVADIS a global solution for monitoring sustainability in supply chains. Methodology assesses policies, actions and published reporting related to the environment, labour and human rights, ethics and sustainable procurement. ISS completed our sustainability rating in 2024 in order to have a deeper understanding of our current ESG performance. The results show we have a good foundation with higher than average on our 'Ethics' score but a way to go on our ESG journey compared to other organisations who have been rated by Ecovadis.
- **3. ITPCO** (International Taskforce of Port Call Optimisation) ISS plays an active role in developing industry-standard "Just in Time" processes for port calls. By minimising waiting times and optimising

vessel speeds, JIT can significantly reduce fuel consumption and emissions. Our preliminary analysis, based on 2022 data from Rotterdam and Singapore, demonstrates the potential of JIT to deliver substantial environmental benefits. As the industry adopts these standards, we anticipate significant emissions reductions for our customers.

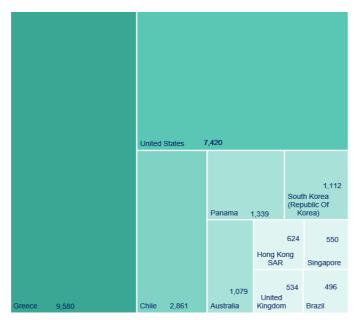
- 4. IMPA One of the first maritime provider services to reaffirm commitment to Responsible Business Conduct as an IMPA Act Certified Supplier in August 2022. This means that we will be working to align our CSR due diligence processes with the global minimum standard for social, environmental and economic sustainability, i.e. the UN Guiding Principles on Business and Human Rights and the OECD Guidelines.
- **5. Blue Visby** Inchcape became the first port agent to be a consortium member of Blue Visby whose purpose is to eradicate Sail Fast Then Wait and allow vessels to reduce speed, thereby reducing the carbon footprint of the maritime industry.
- **6. Preserving the environment** working with local authorities with a particular focus on protecting the environment and marine environment we are privileged to work in.
 - Support our customers and vendors to become more sustainable.

So, what are we doing to support our customers on their sustainability journey?

From supporting our customers' emissions reporting through to our initiative on sustainable boilersuits and our electric vehicle programme, we constantly strive to improve our support of the environment.

- 1. Electric vehicles ISS supports the first 100% electric passenger launch, X Tron working with Singapore Port Authorities.
- 2. Supply chain sustainability mapping of our strategic Vendors (Hotel, Launch, Taxi, Harbour Towage and Waste Management Vendors) and Partner Agents in a number of regions since 2022. We currently provide Scope 3 data to over 20 customers in 50 ports to help understand end-to-end supply chain emissions.

CO₂ generated by the supply chain - hotel, taxi & launch



MT CO₂e Showing 10 highest emitters

SHOWCASE

3. 'Sustainable' boilersuits – working with customers, we have developed an industry-leading, safety certified 'sustainable' boilersuit.



- **4. Industry** partnerships on safety and sustainability initiatives such as this: https://rightship.com/about-us/partnerships/zero-harm-partners.
- **5. Survey and inspection** we are constantly looking for new opportunities in the market to support our

customers. We have developed training for our global survey and inspection team for future fuel bunkering capability in support of IMO 2050 GHG Strategy and in a programme to digitise our survey reporting process and reduce the use of paper to the extent practicable.

ACTIONS

Compliance and reporting

	What we will do	How we will measure it	What next in 2025
Fulfil ESG legal obligations	Ensure a strong understanding of and compliance with legal requirements for our global footprint.	Completion, and external validation of mandatory obligations.	Development of ESG legal framework to proactively manage our obligations.

Climate change

	What we will do	How we will measure it	What next in 2025
Develop a roadmap to help us achieve Net Zero by 2050	Establish a roadmap to reach Net Zero for SLT agreement. Focus on quick wins to preserve energy across our offices and operations.	 Create a baseline for our operations and offices: Current scope, 1, 2 and 3 emissions. Total amount of waste generated (e.g. recycling and single use plastic). Based on data, set realistic time-bound targets. Create a sustainable procurement policy. (Q3 2025). Create training content for employees. 	Agree roadmap Q4.
Understand our industry and use external insights – participate in industry fora	Understand our industry position and use external insights to update areas of focus.	Delivery of target roadmap.	Progress towards ISO14001 (Environmental Management System) and 45001 by Q1 2026.
Support our customers and vendors to become more sustainable	Support our customers and vendors to become more sustainable through use of our data and products.	Conduct a third-party verification on current scope 3 GHG emissions reporting.	Develop a sustainability framework for vendors with a high environmental impact.
Support customers to comply with regulations and provide options to reduce fuel consumption through use of our service	Develop customer waste disposal and biodiversity (anti-fouling/hull cleaning) services.	Develop the range of services we can offer.	Create a global waste disposal, biodiversity and alternative fuels advisory.

PILLAR 3 - BUSINESS CONDUCT

At ISS, we believe:

- 1. Compliance and ethics are at the forefront of our decisions and actions.
- **2.** We encourage and recognise the need to speak up in any unsafe or un-compliant situation.
- **3.** We learn from things that go wrong and respond supportively.

GOVERNANCE

Our strategy is founded in industry standards and best practice which we have embedded across ISS and with external vendors, where appropriate, to improve our focus on Safety, Compliance & Ethics:

- **1.** As a UK-based company we comply with all UK Legislation.
- 2. IOGP Life Saving Rules embedded where appropriate across ISS for the safe running of our operations.
- **3.** ISO 9001 (Quality Management Systems) one of the first port agents to achieve certification. Certified in 1991.
- **4.** ISO27001 (Information Security Standard) achieved in 2023 and transitioned to 27001:2022 in 2024, which ensures security controls are aligned with newer technologies such as Cloud.
- **5.** MACN ISS partner with the MARITIME ANTI-CORRUPTION NETWORK to drive industry standards.
- **6.** TRACE ISS complies with anti-bribery regulations due diligence in international trade.
- **7.** GDPR ISS complies with GDPR rules with data processing and handling.

INITIATIVES

ABC/Trade/Others

- Compliance with Code of Conduct.
- Ensure compliance with standard policies, procedures and controls.

Our people, communities where we operate, customers and vendors, all expect us to have the highest ethical standards. We believe our integrity in a complex industry is key to our success.

Incorporated in the UK and subject to all UK legislation, as well as other international laws, we ensure that not only do we comply with the law but go above and beyond to ensure our customers standards are adhered to.

Our industry-leading compliance framework starts with our Code of Conduct, which outlines the standards of how we behave in ISS, and applies to both our employees and vendors. We want to work with business partners that share our commitments to safety, ethics and compliance.

Failure to follow our Code may result in disciplinary action up to and including termination of employment or contract.

Our culture is underpinned through our Compliance roadmap and actions, clear processes, robust, mandatory training programmes and, where possible, digital controls to drive compliance. Training is reviewed regularly and updated in line with changing legislation, which includes:

PROCESS	SUMMARY CONTENT		
1. Code of Conduct Outlines how we behave in ISS.			
2. Sanctions	It is crucial that we know who we do business with. ISS must not have commercial or financial dealings with parties subject to international trade sanctions and US export controls. We also ensure compliance with other important national or international sanctions and regulations that may apply.		
3. Anti Bribery and Corruption (ABC)	We operate in many parts of the world where bribery and corruption present a high risk. ISS explicitly prohibits engaging in any form of bribery or corruption.		
4. Gifts and Entertainment (G&E)	Outlines G&E process and thresholds to ensure we have rigorous controls around appropriate gifts and entertainment.		
5. Whistleblowing	ISS encourages speaking up and reporting any signs of wrongdoing. This process outlines how to raise a formal whistleblower concern and our zero tolerance towards retaliation.		
6. Anti Money Laundering (AML)	Outlines how ISS carry out our customer due diligence to ensure customers are who they say they are through internal risks and controls.		
7. Modern Slavery	Ensures that all at ISS are aware of Modern Day Slavery, the signs to look out for, and how to report any concerns.		

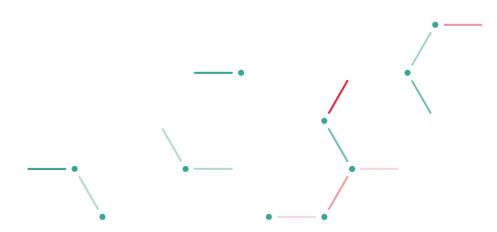
CYBERSECURITY

Secure IT operations are the bedrock of any modern organisation. As we continue to develop our digital systems through our Transformation programme (Accelerate) and our customers rightly demand more digital integration, the continued security of our data and systems is paramount. Inchcape uses best-of-breed certified cybersecurity solutions – validated through Security Score Card (an independent benchmarking service), underpinned by our own ISO27001 certified and GDPR compliant controls.

We recognise that there are never any cast iron guarantees relating to cybersecurity but go to great lengths to ensure that our customers' data and operations are in safe hands. We continuously maintain and improve our cyber status by comparing ourselves against a wide range of companies and best practices, using specialist tooling, external audit reports, and third-party cybersecurity advisors.

We also carry out regular penetration testing, detailed incident management supported by a 24/7 security operations centre, dedicated and experienced cybersecurity resources, automated patching, and SOC2 assessment of supply chain, monthly vulnerability scans, disaster recovery testing, end point detection and response solution, regular mandated staff training, simulation exercises, email filtering, mandate SSO and MFA across all applications.





- Drive industry standards via partnership with the Maritime Anti-Corruption Network.
- Maintain a Code of Conduct for vendors.

We engage in robust due diligence to assess our counterparties and the risk. We communicate our expectations clearly to vendors and agree contractual obligations where appropriate. We place emphasis on our high-risk vendors (for example launch vendors) and work collaboratively to raise the bar across the industry.

 Every vessel and counterparty we do business with is screened for sanctions concerns using industry leading tools (e.g. Lloyds List Intelligence and Dow Jones) for one-off as well as continuous monitoring, plus any instances of corruption, fraud, politically exposed person (PEP), and other high-risk factors. This is a priority that ISS remains committed to achieving.

- Any adverse reporting is subject to robust Know Your Customer (KYC) up to and including Group Counsel review.
- Our compliance framework is reviewed and updated continuously to ensure risks are monitored and managed.
- Our transformation programme is driving us to be even more rigorous through the implementation of digital technologies that integrate with our in-house operating system (Optic).

Speak up

- Provide a speak-up line for employees.
- Provide a speak-up line for third parties.

ISS creates a safe space to speak up without the fear of retaliation. We encourage speak out through our anonymous disclosure platform for Gifts and Entertainment (OneTrust | Trust Intelligence) and an anonymous hotline (Convercent).

ACTIONS ABC/Trade/Others

	What we will do	How we will measure it	What next
Compliance with Code of Conduct	Training	Refresh all Mandatory Compliance training.	100% completion rate by year end.
	Speak up	Annual campaign.	Track engagement and participation.
Ensure compliance with standard policies, procedures and controls	Process	Process and controls in place.	Documents updated and in place.
Maintain a Code of Conduct for vendors	Ensure our vendors have a strong understanding and compliance of our Supplier Code of Conduct.	80% of vendors to have signed the Supplier Code of Conduct.	Review current Supplier Code of Conduct, update and implement.
Drive industry standards via partnership with the Maritime Anti- Corruption Network	Actively engage in MACN Partnership.	Number of fraud communications received.	 Attend MACN meeting to confirm operational procedures. Raise visibility of our partnership with MACN across the Inchcape network.

