Anti- Slavery & Human Trafficking Policy Statement

Policy Owner: Legal Department
Approved By: CEO
Effective Date: December 2022
Review Date: December 2023

This document represents the Formula E Group's[1] (hereinafter "**The Company**" or "**Formula E**" or "**We**") Anti-Slavery and Human Trafficking Policy Statement for the Financial year ending 30th September 2022.

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 World 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 standards Formula E has set 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, reserves the right to amend it if necessary.

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 conduct administration of its business. Formula E fully supports the UK Government's objectives behind the MSA and this statement affirms Formula E's intention to act ethically in all business conducts and relations.

2.3 We expect everyone who works for Formula E, on its behalf, or is in partnership with Formula E in any capacity, to have 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 practices within the day-by-day

[1] **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.*

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 People 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 and labour sourcing standards, and to ensure full compliance 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.

2.7 This policy takes into account that Formula E's suppliers and sub-suppliers are truly worldwide, with events being hosted in Europe, Asia, Africa, North America and South America.

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 Championship season racing events. Formula E ensures from the beginning of this outsourcing process that every party involved in its supply chain is aware of its Modern Slavery Standards and is committed to fully adhere with them. Upon appointment the following documents are issued to all new suppliers:

- Modern Slavery Act Questionnaire, which seeks assurance that all companies with a turnover of more than £36million have implemented anti-modern slavery standards and controls;
- Supplier Code of Conduct which includes the following statement: "Suppliers must not participate in any form of human slavery, human trafficking and forced labour. Suppliers must provide the same in respect of their own supply chain… Formula E adheres to the Modern Slavery Act 2015 and expects its suppliers to conform to the same standards."

On an annual basis, the Company conducts a "Supply Chain Risk Assessment" to clearly identify the areas of the business where there are the greatest risks of Modern Slavery. Our Season 2022/2023 ("**Season 9"**) risk assessment, involving the Senior Internal Audit Manager, Chief Finance Officer, and the Procurement Director identified the following as areas of the business requiring monitoring, review and action proportionate to the level of risk assessed:

3.1.1 Global and Local TV and Electronic Event Infrastructure

Risk: Appointed Contractors and sub-contractors in the TV and Electronic Event Infrastructure industry subject their employees to slave labour and/or human trafficking.

There are several global partners Formula E works alongside with to deliver electronic data and tv content to the Formula E internal ecosystem and to the worldwide broadcasters and websites. The UK-based 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".

According to the questionnaire responses received, Formula E will conduct a more in-depth review of the control mechanisms put in place by these suppliers to manage modern slavery risks and discuss the application of specific Key Performance Indicators in order to monitor and contain the resulting Modern Slavery Act compliance risks.

Many of the local broadcasters at events have media rights agreements in place with FE to provide coverage to local audiences utilising their own staff to construct their TV infrastructure for the event. Such companies provide their own supply chain but FE still makes it a duty of agreement with local broadcasters to remind them of FE's stance on Modern Slavery and this is referenced in all agreements with all media rights broadcasters.

3.1.2 Event Construction Contractors, Agency Staff and Other Labour Suppliers

Risk: Directly appointed Contractors and sub-contractors in the construction industry and other labour industries subject their employees to slave labour and/or human trafficking.

In the organisation of its racing events in city centres around the world, Formula E appoints several contractors to build the racetrack, paddocks, grandstands and carry out trackside events and entertainment. The Company recognises that such contractors may have a high-level risk of Modern Slavery, particularly in those countries bound by less stringent employment regulations than the European Union and North America.

Under the Formula E procurement process, the Company requires a full disclosure of each contractor employment standards and source agencies through which the contractors source their workforce. If such Event construction providers are contracted by a promoter or a local operator (as both defined later on in this document) of the Formula E events, the responsibilities and obligations to comply with Modern Slavery Act and Standards are included under the terms of their respective event operator and/or promoter agreements in place with Formula E.

Formula E directly, or by delegation of authority through promoters and/or local operators, requires all existing and new Event suppliers to submit the Ethical Employment Standards Questionnaire as part of the Formula E Pre-Qualification Questionnaire ("**PQQ**") provided under the Formula E procurement process.

In accordance with the questionnaire responses, Formula E may decide to carry out a more in-depth audit of the contractors and their working agency employment standards. The company approach shall be decided following a Modern Slavery risk assessment carried out by the Company Internal Auditor. Audits will be conducted to measure against the standards of this policy and the Ethical Trading Initiative (ETI) Base Code.

Formula E has, as part of its supply chain risk assessments, identified the following five types of on-site labour as key areas of focus in any audit of event compliance with this Policy:

- Temporary Structure Construction;
- Scaffolding construction;
- Structure Fit-out;
- Cleaners;
- Hospitality staff

3.1.3 Local Promoters

Risk: Local promoters in high-risk territories appoint sub-contractors, across the above five types of on-site labour, which subject their employees to slave labour and/or human trafficking.

In the organisation of its events around the world, Formula E may appoint a local promoter (the "**Promoter**") to organise and promote the Formula E event in the country where the event is held and to commercialise the commercial and media rights associated to the event. Under each local promoter agreement between Formula E and the designated Promoter, the Promoter has the obligation to fully comply with the Modern Slavery Act and the Modern Slavery Standards. Furthermore, the Promoter must ensure that all the suppliers contracted directly for the realisation of the Formula E event, fully comply with the Modern Slavery Act and Standards.

Before appointing a Promoter, Formula E carries out a careful due diligence of the financial and ethical standards of the Promoter.

Formula E is committed to build long-term relationships with its Promoters and working together with them to ensure continual Improvement in further reducing the risk of slavery and human trafficking as part of its obligations under the MSA.

3.1.4 Local Operators

Risk: Local operators fail to prevent modern slavery in the supply chains of the contractors they appoint.

Formula E may also assign to local companies (the "**Operator**") the procurement and supervision of certain services needed for the realisation of the Formula E event. Within this process, Formula E requires the disclosure of the Operator's source agencies and their employment standards as a standard information requested under the Operator's agreements.

Under each event operator agreement entered into by Formula E, the Operator has to fully comply with the Modern Slavery Act and Standards and that it has to confirm that all the suppliers contracted directly by the Operator fully comply with the Modern Slavery Act and Standards. Formula e reserves its right to audit the local Operators in respect of their compliance with the Modern Slavery Standards.

We also undertake careful due diligence on the financial and ethical performance of the Operators 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.

3.1.5 Key Partners with Event Activations

Risk: Key partners deliver on-site activations using construction sub-contractors whose supply chain is vulnerable to modern slavery.

As part of our standard onboarding process for new suppliers, we require all key partners/sponsors of Formula E and its events to complete the MSA questionnaire.

Where these partners develop their own on-site activations at our events, we will seek assurances that they are looking to implement the same level of controls as FE to ensure that their supply chain is free from Modern Slavery.

While such companies provide their own supply chain FE still makes it a duty of agreement with sponsors to remind them of FE's stance on Modern Slavery and this is referenced in all agreements with them.

Furthermore, from Season 9, FE has updated its supplier agreement general terms & conditions to emphasise the requirement for suppliers to notify the company of any sub-contracted companies and their responsibility to comply with the same MSA requirements as direct suppliers. FE has also re-iterated this supply chain mapping requirement as part of the Accreditation process for each event and will work with these partners to seek ongoing improvement in modern slavery controls and pursue the implementation of identified best practice, particularly in territories where the risk of modern slavery is greatest.

The accreditation process has been adapted in S9 so that all partners are reminded of their responsibility to notify FE of any sub-contractors who need to be accredited and their responsibility to ensure assurances are sought to reduce the risk of modern slavery being present in their supply chain.

3.1.6 Risk Assessment Outcomes

In accordance with the 5 identified risk areas above, Formula E has undertaken risk assessments to determine the overall risk exposure specific to the working environment present at each of its Championship events. This is achieved by multiplying the Slavery Vulnerability score from its 2018 Global Slavery Index, with the likelihood of slavery being present in the supply chains specific to the control framework in each location.

Priority is given to auditing and improving controls for each Championship event where a "High" or "Very High" risk exposure has been identified.

3.2 Formula E Staff

Employment of permanent and temporary Formula E staff members is conducted either directly or through respected UK agencies and is considered minimal risk. The

People Director is responsible for ensuring all UK employment legislation is complied with and all of our employees are paid above UK minimum wage. All all early careers programmes are compliant with UK employment legislation.

If any party which makes 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 Senior Internal Audit Manager: James Bentley (jbe@fiaformulae.com) or the Chief Finance Officer: Mike Papadimitriou (mp@fiaformulae.com).

4. Training and Communication

4.1 All new Formula E employees are required to attend a training session on the Modern Slavery Act (MSA) 2015 and every employee and board member is required to annually complete an MSA compliance statement and refresher training on the MSA.

4.2 This Policy Statement will be made available to all staff via the internal policy depository, with the statement referenced as part of this annual training and is made accessible to any external stakeholders via the Formula E website.

5. Responsibility for this Policy

5.1 The Company's leadership team 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 People 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 this Policy. This includes being responsible for suggesting improvements and amendments to the policy where needed.

6. Breaches of this Policy

6.1 Formula E has a Whistleblowing Policy to allow its staff to raise any concerns of suspected wrongdoing, including breaches of this policy, to any of the following personnel:

Chief Legal Officer; Chief Finance Officer; Chief of Staff; People Director; Senior Internal Audit Manager; Audit Committee Chair; FE's External Auditors; Protect (Independent Whistleblowing charity).

6.2 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 Formula E is contractually involved with, 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 9 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:



Name: Jamie Reigle

Title: CEO

Formula E Group

Date: 06/12/2022

Appendix A: Action Plan Delivery- Season 8 (2021/22)

Action Area	Action	Ownership	Implemented?
Policies & Contracts	Review this Policy Statement and ensure the Leadership Team approves its content and is satisfied with the implementation of the previous year's action plan.	CEO/ CFO/ CoS/ Finance Director	Yes
	As part of recommendations coming act of S6 MSA Compliance audit, new contract clauses have been agreed with the Legal department to incorporate into the agreements with local operators and promoters which place greater emphasis on the need to comply with the UK MSA 2015. This is particularly in relation to the requirement for the supplier PQQ to be issued to all shortlisted sub-contractors. Returned completed questionnaires can help the contract award decision process.	Procurement Director/ Senior Internal Audit Manager	Yes- Ongoing
People	Modern Slavery & Human Trafficking awareness e-learning to be completed by all FE employees as part of Onboarding process or annual refresher.	Senior Internal Audit Manager	Yes- Ongoing
	Modern Slavery Act 2015 Compliance Statement to be signed off by all employees as part of Onboarding process or annually.	Senior Internal Audit Manager	No- Priority given to improving internal controls.
Supply Chain	A new Supplier Code of Conduct will be issued to all suppliers. This document includes the following statements: "Suppliers must not participate in any form of human slavery, human trafficking and forced labour. Suppliers must provide the same in respect of their own supply chain." "Formula E adheres to the Modern Slavery Act 2015 and expects its suppliers to conform to the same standards."	Procurement Director	Yes
	To ensure greater completion rates of Modern Slavery Act Compliance questionnaires, and in addition to being included as part of the PQQ process, this questionnaire will also be issued as part of the New Supplier process conducted by the Finance department to ensure all supplier data is captured.	Finance Department	Yes- Ongoing

	The strictest agreement clauses will be applied to contracts of Local Operators based in territories where a high risk of Modern Slavery exists, whereby the Event Operator will be required to: 1. Include within agreements with local appointed suppliers the need for appropriate labour documentation for all working staff; 2. Check and challenge the labour documentation, for a sample of staff employed by the appointed local suppliers; 3. Include in contracts with local suppliers reference to compliance with relevant local labour laws; ▪ Undertake labour inspections during the lead-up to the event and provide a formal report on the outcomes, including a record of the number of labourers on site against the number of labourers identified with/ without verified supporting documentation.	Procurement Director/ Senior Internal Audit Manager	Yes- ongoing
	For each event where the modern slavery risk is considered "high" or "very high", the following internal check controls should be applied: ▪ Physical sample checks on working permits and other documentation for all on-site staff; ▪ Shadowing labour inspections by event operator; ▪ Detailed review of labour inspection report provided by event operator. Key suppliers in the following categories should be tested: ▪ Construction/ Site Crew ▪ Labour suppliers, inc. cleaning, security, hospitality ▪ Office/ Agency Staff.	Procurement Director	Yes
	An Internal Audit will be undertaken of one of the above events identified as "high risk" to measure compliance and identify areas for improvement.	Senior Internal Audit Manager	Yes
	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.	Senior Internal Audit Manager	No- Priority given to

			improving internal controls.
	Where key partners/ sponsors develop their own on-site activations at FE events, Formula E will seek assurances that they are looking to implement the same level of controls as FE to ensure that their supply chain is free from Modern Slavery. FE will therefore work with these partners to seek ongoing improvement in modern slavery controls and pursue the implementation of identified best practice for construction and fit-out supply chains, particularly in territories where the risk of modern slavery is greatest.	Event Experience/ Senior Internal Audit Manager	No- Priority given to improving internal controls for new territories.

Appendix B: Action Plan - Season 9 (2022/23)

Action Area	Action	Ownership	Target Date
Policies & Contracts	Review this Policy Statement and ensure the Exec Team approves its content and is satisfied with the implementation of the previous year's action plan.	CEO/ CFO/ CoS/ Finance Director	30/11/22
	Contract clauses have been incorporated into the agreements with local operators and promoters which place greater emphasis on the need to comply with the UK MSA 2015. This is particularly in relation to the requirement for the supplier PQQ to be issued to all shortlisted contractors appointed by local promoters and operators. Returned completed questionnaires can help the contract award decision process.	Procurement Director/ Senior Internal Audit Manager	Ongoing
	New supplier contract clauses have been added in relation to Modern Slavery requirements expected of suppliers and in the transparency of their supply chain, particularly in relation to ensuring sub-contractors are subject to the same accreditation process as all direct suppliers.	Legal Department	1/10/22
People	Modern Slavery & Human Trafficking awareness e-learning to be completed by all FE employees as part of Onboarding process or annual refresher.	Senior Internal Audit Manager	Ongoing
	Modern Slavery Act 2015 Compliance Statement to be signed off by all employees as part of Onboarding process or annually. Update of Policy Statement brought forward to facilitate Compliance Statement issue as part of start-of-season governance pack.	Senior Internal Audit Manager	31/12/22 & Ongoing (new staff)
Supply Chain	A Supplier Code of Conduct will be issued to all suppliers, which includes reference to FE's expectation of suppliers in relation to its Modern Slavery standards.	Procurement Director	Ongoing
	Modern Slavery Act Compliance questionnaires, will be issued as part of the New Supplier process conducted by the Finance department to ensure all supplier data is captured.	Finance Department	Ongoing
	The strictest agreement clauses will be applied to contracts of Local Operators based in territories where a high risk of Modern Slavery exists, whereby the Event Operator will be required to: 1. Include within agreements with local appointed suppliers the need for appropriate labour documentation for all working staff;	Procurement Director/ Senior Internal Audit Manager	Ongoing

	2. Check and challenge the labour documentation, for a sample of staff employed by the appointed local suppliers; 3. Include in contracts with local suppliers reference to compliance with relevant local labour laws; 4. Undertake labour inspections during the lead-up to the event and provide a formal report on the outcomes, including a record of the number of labourers on site against the number of labourers identified with/ without verified supporting documentation.		
	For each event where the modern slavery risk is considered "high" or "very high", the following internal check controls should be applied: ▪ Physical sample checks on working permits and other documentation for all on-site staff; ▪ Shadowing labour inspections by event operator; ▪ Detailed review of labour inspection report provided by event operator. Key suppliers in the following categories should be tested: ▪ Temporary Structure Construction; ▪ Scaffolding construction; ▪ Structure Fit-out; ▪ Cleaners; ▪ Hospitality staff.	Procurement Director	Ongoing
	An Internal Audit will be undertaken of one of the above events identified as "high risk" to measure compliance and identify areas for improvement.	Senior Internal Audit Manager	30/4/22
	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.	Senior Internal Audit Manager	30/6/22
	Where key partners/ sponsors develop their own on-site activations at FE events, Formula E will seek assurances that they are looking to implement the same level of controls as FE to ensure that their supply chain is free from Modern Slavery.	Event Experience/ Senior Internal Audit Manager	30/6/22

	FE will therefore work with these partners to seek ongoing improvement in modern slavery controls and pursue the implementation of identified best practice for construction and fit-out supply chains, particularly in territories where the risk of modern slavery is greatest.		
	Accreditation requirements demand that FE is notified of the names of all subcontractors who will be on-site, and their staff. This will better facilitate supply chain audits where risks are identified.	Accreditation department/ Senior Internal Audit Manager	1/1/23