



ANTI-BRIBERY POLICY & VALUE STATEMENT

As a Group, Pendragon maintains relationships with many stakeholders. Among them are commercial organisations and individuals, including both public officials and business executives, who are in a position to exert influence over decisions that materially affect the interests of Pendragon and its Group's businesses.

In the light of the general law on bribery and corruption, and, more specifically, the Bribery Act 2010, Pendragon has adopted a statement of our corporate value on anti-bribery. The value statement governs all our business dealings and the conduct of all persons or organisations who are appointed to act on our behalf.

We request all who have, or seek to have, a business relationship with Pendragon and/or any member of our Group, to familiarise themselves with our Anti-bribery value statement and to act at all times in a way which is consistent with our Anti-bribery value statement.

PENDRAGON PLC ANTI-BRIBERY VALUE STATEMENT

As part of our culture of good governance for good business, at Pendragon we operate to a set of core values which reflect our relationships with our principal stakeholder groups: customers, manufacturers, shareholders, suppliers and team members.

We adopt a behavioural value for all our business relationships, reflecting our attitude to bribery, whether it is bribery on our behalf or bribery of our people. We are committed to opposing bribery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

Our attitude to bribery is: zero tolerance.

Those who are accessing this web page because they:-

- are seeking a business relationship with us/our businesses or
- already have a business relationship with us/our businesses

are also advised to familiarise themselves with the main features of our measures for combating bribery:-

Suspicious Activity Confidential Feedback Line 0870 600 6400.

Gifts and Hospitality Policy (please see below).

- You should call this line in any of the following circumstances:-
- You suspect a person acting on behalf of Pendragon or one of our businesses is **seeking to bribe someone in your organisation**;
- You suspect a person acting on behalf of Pendragon or our businesses is **seeking to bribe a third party** for the commercial advantage of Pendragon or one of our businesses
- You have received an approach from a person acting on behalf of Pendragon or one of our businesses who has **invited you to bribe them** or reward them (in whatever manner) in return for them agreeing to act improperly
- You have any information which leads to the rational conclusion that a person acting on behalf of Pendragon or one of our businesses is preparing to commit, is committing or has committed an **act of bribery**.

Reports to the Suspicious Activity Confidential Feedback line ("the Line") are kept in confidence, subject to the need for Pendragon to act responsibly and within the law. The source of reports to the Line will be kept confidential, save to the extent that our maintaining that secrecy or the anonymity of the source is not permitted by law, or is not consistent with our maintaining our adequate procedures for the prevention of bribery being committed on our behalf.

Gifts and Hospitality Policy - This can be found here on the Company website in pdf form.

We expect all with whom we have business dealings to access our policies and procedures and use them to help us prevent bribery, both of our people and by our people.