

RACING POINT UK LIMITED

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Racing Point UK Limited during the year ended 31 December 2018 to ensure the prevention of modern slavery and human trafficking in its business and supply chains.

INTRODUCTION

Racing Point UK Limited (“Racing Point”) and its Board of Directors recognise that Racing Point’s business deals with many different organisations within its supply chain, in addition to employing a large number of staff and utilising the services of both agency workers and contractors.

Racing Point complies with the United Kingdom legislation and guidance on employment law and, more specifically, the Modern Slavery Act 2015 (the “Modern Slavery Act”). We have taken all reasonable steps to review our existing compliance and risk management processes to determine what measures already exist and what, if any, further measures we may need to adopt to comply with the Modern Slavery Act and to ensure the prevention of slavery and human trafficking taking place in any part of our business and its supply chain.

Modern slavery can occur in various forms, including forced or compulsory labour, human trafficking and servitude. All of these forms involve the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. Such actions are a criminal offence under the Modern Slavery Act.

This statement governs our business dealings and the conduct of the organisations and personnel with whom we contract directly or who we appoint to act on our behalf. We expect all who have, or seek to have, a business relationship with Racing Point ensure that they familiarise themselves with our anti-slavery values and documentation and to act at all times in a way which is consistent with such values.

OUR BUSINESS STRUCTURE

Racing Point has been in operation since August 2018, based in Silverstone, Northamptonshire. As a racing team that participates in the FIA Formula One World Championship, Racing Point has an international supply chain, with direct sourcing of parts, equipment, services and merchandise performed by its employees, contractors and third party organisations.

Racing Point’s supply chain is predominately sourced within the United Kingdom, France, Germany, Italy, Austria and the USA through local contractors, although services are also obtained from each country where the team races.

OUR ANTI-SLAVERY VALUES

We strive for a culture of good governance, operating to a set of core values which reflects our relationship with the key stakeholders of Racing Point: clients, consultants, subcontractors, suppliers and employees. Our key values within our business relationships reflect our stance against the exploitation of individuals in any form and, in particular, the offences under the Modern Slavery Act. We expect the same values from our employees and business partners.

PURPOSE OF THIS STATEMENT

This Statement aims to prevent opportunities for modern slavery to occur within our business and our supply chain. The term “modern slavery” has the meaning given in the Modern Slavery Act. Working within the guidelines of the Modern Slavery Act, we are committed to acting ethically and with integrity in all business dealings and relationships. We use all reasonable endeavours to implement and enforce effective systems and checks to ensure modern slavery is not taking place in our own business or those of our suppliers.

POTENTIAL SPECIFIC RISKS OF WHICH RACING POINT IS AWARE

Racing Point has identified certain areas where it considers there is a higher risk of slavery and human trafficking taking place as follows, making use of examples taken from the Government’s guidance published under the Modern Slavery Act:

Country risks. Exposure may be greater in global supply chains in countries where protection against breaches of human rights is limited, particularly with regard to rights of foreign contract workers to retain their own ID and papers, and/or where work arrangement by agents is common. Since Racing Point’s supply chain is based mainly in the USA and the EU, we do not consider there to be specific country risks. We will, however, review this position regularly and assess any changes and the impact of such changes, taking action where necessary.

Sector risks. There are different risks and levels of risk in different sectors. We do not consider motor sport to be a high risk sector but we will keep this under review.

Business partnership risks. Many of Racing Point’s supply chain relationships are with companies that we have dealt with for a number of years. These companies operate at the high skills, high cost area of manufacturing and are therefore considered by us to be lower risk. Where Racing Point deals with new suppliers, we implement our due diligence checks set out below to avoid a higher risk.

STEPS FOR THE PREVENTION OF MODERN SLAVERY

1. We use all reasonable endeavours to ensure transparency in our own business and in our approach to preventing modern slavery throughout our supply chains. We expect the same standards from our contractors, suppliers and other business partners.
2. Our contracting process includes issuing a questionnaire to both our current and new suppliers, requesting reasonable disclosure of their procedures with their supply chain, in order that we can do what is reasonably practicable to prohibit the use of forced, compulsory or trafficked labour, or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same standards.
3. We undertake a review of the replies to our supplier questionnaires in order to ensure we have a consistent approach to the prohibition of modern slavery.
4. We have a designated team of staff members who are familiar with the requirements under the Modern Slavery Act and who understand our procedures of review within our supplier base.
5. As part of our supplier risk assessment, we will follow up with those suppliers who are obliged to comply with the Modern Slavery Act in the event that they do not have the required documentation and procedures in place. We will provide guidance on the appropriate time-frame within which our business reasonably requires these suppliers to comply. We will make all reasonable endeavours to undertake an annual audit, in particular with regard to suppliers that fall within the application of the Modern Slavery Act, to ascertain their level of compliance and ongoing duties to implement procedures compliant with this legislation.
6. We check all recruitment agencies that act on our behalf to ensure they carry out our recruitment process for employees, consultants and sub-contractors in a transparent manner and that they comply with the United Kingdom immigration rules and the Modern Slavery Act.
7. Whilst recognising our statutory obligation to set out the reasonable steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we do not control the conduct of individuals and organisations in these chains.
8. We will comply with this policy but are not in a position to influence our suppliers' activities, particularly if these are not disclosed to us. However, to underpin our compliance with practical steps, in summary, we intend to adopt the following key measures:

- (i) conduct a risk assessment to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that all reasonable efforts can be focused on those areas;
 - (ii) have an ongoing dialogue with our suppliers, through our supplier questionnaire, to convey our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;
 - (iii) where appropriate, as part of our supplier audit, we may need to introduce additional contractual provisions for our suppliers to confirm their adherence to this policy and to accept our right to audit their activities and relationships (where practicable), both routinely and at times of reasonable suspicion.
9. From the financial year 2018, we will include in the directors' report accompanying our annual financial statements a reference to Racing Point's Modern Slavery and Human Trafficking Statement, which will be added to our website from 2018 and reviewed regularly.

RESPONSIBILITY FOR THE POLICY

Ultimate responsibility for this policy lies with Racing Point's Board of Directors, who have the overall accountability for ensuring this policy and its implementation complies with our legal and ethical obligations.

Employees who are tasked with the responsibility of reviewing suppliers under this policy are responsible for ensuring those reporting to the Board of Directors understand and comply with this policy and are given adequate training.

ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

Our whistleblowing procedure provides guidance on how concerns can be communicated to Racing Point. If an employee has any concerns regarding suspected modern slavery associated with Racing Point or any of our suppliers, they should use the whistleblowing procedure to report it to us. The whistleblowing procedure may be found in our staff handbook.

If an employee has any concerns they should approach their line manager, equivalent senior leader or Human Resources. If the matter is extremely serious then a member of the Board of Directors of Racing Point should be approached.

SAFEGUARDS

We encourage openness and support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith any suspicion of

modern slavery in any of our supply chains. Any allegations made which are found to be malicious will result in disciplinary action being taken against the individual.

COMMUNICATION AND AWARENESS OF THIS POLICY

Our approach to modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship and reinforced as appropriate thereafter.

REVIEW

Following its initial adoption, this Modern Slavery and Human Trafficking Statement will be reviewed by Racing Point's Board of Directors on an annual basis and may be amended from time to time.

Signed by Otmar Szafnauer, CEO and Team Principal

Authorised to sign on behalf
of the Board of Directors

Date: 29 May 2019

Next Review Date: 1 December 2019