

At our best: our Code

SEPTEMBER 2026

A message from our Executive Team

Our Code is a framework to help define what our Behaviours mean to us as a company and support us in Winning Together as a team in the right way.

All of us have a responsibility to each other, to understand Our Code and policies and to follow them. And if anyone is unsure or has a concern about someone or something not living up to our Behaviours, then I and my Executive Team colleagues are happy for you to speak up

Sarah Armstrong
Chief People Officer



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1.0

A guide to ‘At our best: our Code’

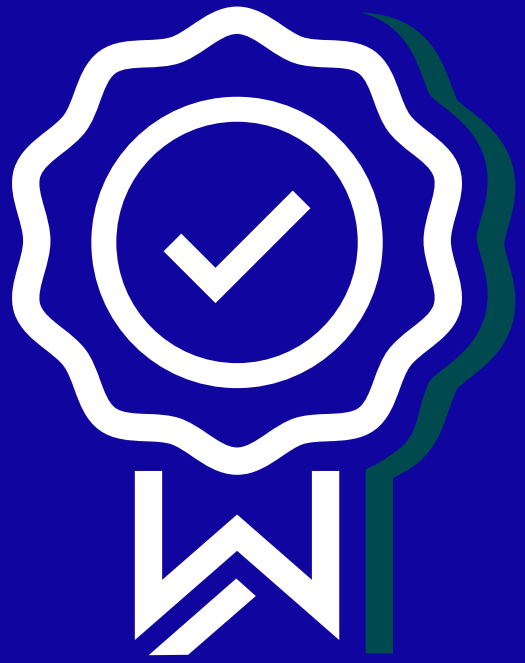
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07 SPEAKING UP



We are proud to work for Rolls-Royce. Our individual and collective actions deliver enduring progress through a culture of high performance, care and belonging. We are driven by a winning mindset and are guided by our Behaviours, Our Code and Group Policies.

1.0 A guide to ‘At our best: our Code’

The choices we make and the things we do must be guided by our behaviours. We: Put Safety First by prioritising safety and speaking up; Do the Right Thing by being caring and acting ethically; Keep it Simple by working together to share ideas and find the most effective way of doing things and staying adaptable; and Make a Difference by thinking commercially and taking ownership for our actions.

From time to time, we all need a little help to do the right thing, no matter what our job is or where we are located. That is what our Code is for. It does not have all the answers to every situation we may face but it does set out our principles and how they apply to our business activities, to guide our decision-making and direct us where to go for additional guidance and help.

Who does it apply to?

All of us. That’s all colleagues employed by the Rolls-Royce Group and any subsidiary or joint venture where we have control. We also encourage all our joint ventures and partners to adopt the same high standards.

Our responsibilities

Whatever our role, we hold the reputation of Rolls-Royce in our hands. By doing the right thing, we safeguard our reputation as a trusted business, and make this a company where we can be at our best.

Each one of us has responsibility to:

- Be accountable for our actions;
- Be aware of the shadow we cast and lead by example to promote and display the highest standards of integrity and professionalism;
- Consider how our decisions and actions affect those around us and make sure everyone has the help and support they need; and
- Create an environment in which everyone feels safe to speak up.

We must make sure:

- We are open to receiving improvement ideas or concerns, and they are taken seriously and followed up appropriately;
- We treat those who speak up with fairness and without prejudice;
- We all have access to our Code, our Group Policies and other policies relevant to our role or place of work;
- We complete mandatory training; and
- Relevant topics within our Code are discussed regularly in our team meetings.

1.0

A guide to ‘At our best: our Code’

continued

What else do I need to know?

Our Code supports behaviours, drawing out principles to help us navigate many of the business dilemmas we might encounter. We are also supported by the Governance Framework and Group Policies that we abide by as a company and as individuals. In addition, there may be local policies and laws that will apply depending on our job role or work location.

While all elements of the people framework support what we do, and how we do it, our behaviours have a direct influence on helping us to work safely, with integrity, with responsibility and efficiently. The following sections of our Code are organised by our behaviours, to show how this happens.

Consequences

We are proud of what we do and the principles we set for ourselves in our Code and the policies that support them. Therefore, we will take appropriate action against anyone who does not live up to these principles, behaviours, or breaches our policies.

1.0 A guide to 'At our best: our Code'

continued

Identifying and solving dilemmas

It is not possible for our Code to anticipate every situation or set out every legal or company requirement. In some situations, we need to use common sense and good judgement – based on the principles set out here – to make the right decisions. If we are faced with a dilemma and we are unsure how to solve it, the TRUST model can help us do the right thing, in line with our principles and what's expected of us.

In the course of our work, if we find ourselves hearing or saying phrases like the ones below, it might mean we are facing a dilemma, or witnessing something wrong or illegal happening and we should take action to resolve it:

- **"No one will ever know."**
- **"It doesn't matter how it gets done as long as it gets done."**
- **"Everyone else does it, so it must be ok."**
- **"Don't worry; it's the way we do things around here."**
- **"I don't want to know."**



T — THINK
About the dilemma

What is the dilemma?

Do we know all the relevant facts?

Who does it affect?

R — READ
The relevant policy or procedure

Is there a principle in our Code to guide us?

What are the relevant policies, procedures and/or laws?

U — UNDERSTAND
The implication of your decision

What is the potential risk to us, our business or other stakeholders?

What is the likely impact on the business?

S — SPEAK
To others for guidance

Talk to our colleagues, manager, or subject matter experts as necessary.

or

Contact a Local Ethics Adviser or the Rolls-Royce Speak Up Line for additional advice.

T — TAKE ACTION
To solve the dilemma

Make an informed decision – this may be a simple choice between a 'right' and a 'wrong' alternative, or a more difficult judgement between two 'rights'.

Evaluate the results of our decision. What was the outcome, and what did we learn from the situation?

Not sure about the situation you are facing?

Ask yourself these questions:

- Are these actions open, legal, fair and honest?
- Is this how I would like to be treated or how I would want Rolls-Royce to be treated?
- How would I feel about myself afterwards?
- How would this issue look if it was reported in the media?
- Would I be comfortable explaining this in court?
- How would I feel if my family and friends knew about my actions?

1.0 A guide to 'At our best: our Code'

continued

Speak up

We should always assume positive intent, that is, expect that other people are trying to create a good outcome for all of us. That way we can have open and positive conversations. We need to be open-minded to approaches from other people who have ideas, questions or concerns, even if they are about our own actions or behaviours.

When we are open and take responsibility for doing the right thing, we all do better and succeed together. So let's create the kind of workplace where we strive to achieve the highest standards of integrity and professionalism and ensure we encourage each other to speak up.

Speaking up isn't just about calling out things we believe are wrong; it's about recognising what's good, and suggesting how to make things better.

We speak up if we...

- Have ideas to simplify and improve the way we work;
- Witness, are aware of, or subject to anything we believe is bullying, harassment or discrimination, or any other inappropriate behaviour;
- Appreciate the contribution of others;
- Suspect bribery, corruption, fraud or facilitation of tax evasion or other criminal offences;
- Can help others to achieve results;
- Have any concerns about possible health and safety, quality, product safety or reliability issues;
- See positive or negative examples of the shadows we cast;
- Believe we have received or divulged information we are not entitled to have or share;
- Can suggest how to reduce waste;
- Have any concerns about how personal data is being handled;
- Can share knowledge or best practice to improve our business;
- Have any suspicions or allegations of anti-competitive behaviour;
- Make a mistake, knowing we will be treated fairly;
- Receive suspicious enquiries from anyone who might be trying to gain unauthorised access to our goods, software or technology;
- Are concerned about any other breaches of laws; and
- Identify risks that could affect us in achieving our objectives.

Questions and concerns

Whenever we have a question or concern, our manager is the first person to turn to. If we can't do that then we contact someone with expertise in the matter. It might also help to talk to an employee representative such as a member of a works council or a union. There may also be local reporting systems we can use. We can speak to a Local Ethics Adviser or raise our questions or concerns through the Rolls-Royce Speak Up Line.

The most important thing is to speak up and talk to someone who can help. If we are approached by a colleague wanting help we will try to help each other find the right place or person to get an answer.

Look at the Speak Up Policy to see how concerns are dealt with and what we can expect to happen when we raise a concern.

Retaliation

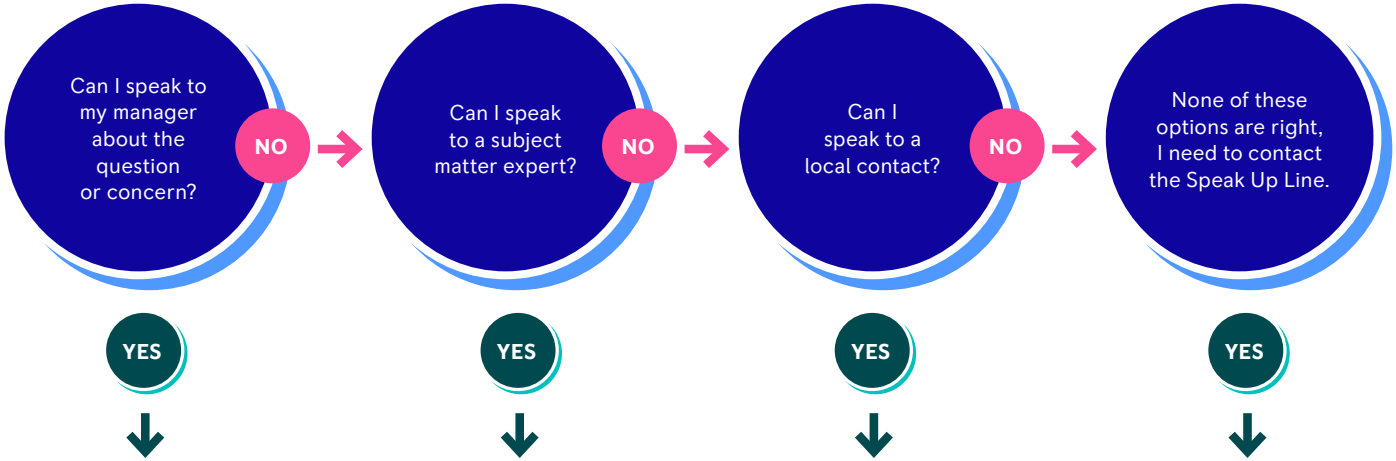
We can ask questions and raise concerns without fear of retaliation. Retaliation against anyone who speaks up is not acceptable at Rolls-Royce and could result in disciplinary action.

1.0 A guide to 'At our best: our Code'

continued

How do I speak up?

If you can't deal with a dilemma yourself then please speak up. This is what you can do.



Line Manager

Line managers are our first point of contact. They are there for us to talk to about any questions or concerns we have, and to support us to resolve them.

Subject Matter Experts

There are subject matter experts who support all the topic areas within our Code. For example, we can contact the People Team to talk about concerns about working together. There may also be union or works council representatives who can also advise us on how to resolve a question or concern.

Local Ethics Advisers

Local Ethics Advisers are colleagues from a variety of functions and levels in the organisation who take on this role in addition to their existing job. They will listen to issues in confidence and will guide you to the best subject matter expert to help. If necessary they can escalate the concern to the subject matter expert for advice or investigation.

Speak Up Line

We can ask a question or raise a concern through the Rolls-Royce Speak Up Line by logging on to www.rrspeakupline.com and completing an online form or calling one of the in-country telephone numbers provided. It is an independently-managed service, available 24 hours a day, 7 days a week, in multiple languages. The question or concern is forwarded to the Ethics and Compliance team who involve the right subject matter expert to provide an answer or investigate a concern. Questions or concerns can be dealt with anonymously, but it really helps the success of an investigation when we can talk directly to get all the facts.

Restrictions on raising a concern through Speak Up Line

Local laws in some countries may restrict the types of concerns that can be raised using the Rolls-Royce Speak Up Line, and the ability to remain anonymous. The Rolls-Royce Speak Up Line gives details of any restrictions.

To find out more about what happens when you ask a question or report a concern, visit the Ethics and Compliance website.

2.0

Put Safety First

10 HEALTH, SAFETY AND ENVIRONMENT
11 OUR LIFE-SAVING RULES
12 PRODUCT SAFETY
13 QUALITY AND PRODUCT ASSURANCE

We prioritise the safety of our people and products and support each other to speak up.



2.0

Health, Safety and Environment

Put safety first

Principles

- We are all expected to help fulfil our Health, Safety and Environment (HS&E) goals.
- We take accountability to help protect and enhance health, wellbeing and environmental performance.
- We never put ourselves or others at risk from our actions.
- We stop work if we think it might be unsafe, and seek advice.
- We behave in a way that minimises impact on the environment.
- We ensure environmentally sound handling, collection, storage and disposal of waste in accordance with the laws in force in the applicable jurisdiction. This includes controls on the shipment of waste between countries.
- We support regulatory principles that promote socially responsible sourcing of minerals, chemicals and other matierials and manage all of our business activities in line with international and local laws relevant to our countries of operation.
- We are committed to the managed reduction and phase out of hazardous substances where feasible.

We will:

- Set and expect the highest standards of behaviour for protecting our own and others' health and safety. We should expect the same from the others around us;
- Assume positive intent and stay open-minded to others who express health or wellbeing concerns about our own actions or behaviours; and
- Follow our life-saving rules.

Group Policies
Health, Safety and Environment
Security and Resilience

Additional Guidance
Health, Safety and Environment intranet

Contacts
Your local HS&E manager, Central HS&E team
Local Occupational Health provider (if applicable)

What happens when...

Q We have really tight deadlines to get this project finished and we are sometimes working around our safety routine. We know it's not ideal, but if it gets the job finished, is this ok?

A No matter how tight the deadlines, safety procedures must never be compromised. Start by speaking to your manager about your worries. If you feel that's not possible, speak to the next level of management or your HS&E manager.

Q I am feeling under a lot of pressure, I don't think I can cope with my workload and don't know what I can do about it?

A It's important to safeguard your health at work, so speak to your manager; they will be sympathetic. You can also get support and advice from your local Occupational Health provider or from Human Resources.

Q I think I've seen something going on in our business that might be harming the local environment. Is this a serious issue?

A Yes, what you've seen might put us in breach of national environmental legislation, as well as cause damage to our environment. Tell your manager what you've seen, or talk to your HS&E manager as soon as possible.

2.0

Our Life-saving Rules

Put safety first

Rules

10 rules to follow – no matter where you work or what you do – that will protect your life.



ALWAYS

speak up to report unsafe acts or conditions when you see them.



ALWAYS

wear your **seatbelt** and obey the **speed limit**.



ALWAYS

wear mandated PPE **(personal protective equipment)** correctly.



ALWAYS

protect against **falls** and use the specific protective equipment when working at height.



ALWAYS

adhere to the approved **lifting** methods.



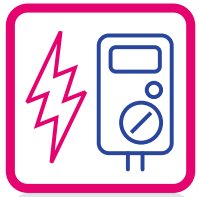
NEVER

use or programme a handheld device when **driving**.



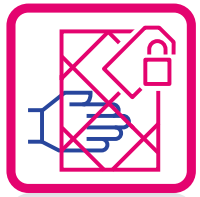
NEVER

work or drive under the influence of **drugs or alcohol** (in accordance with local regulations).



NEVER

assume **electrical equipment** is isolated – **Always test before touch** with approved equipment.



NEVER

deactivate or bypass **safety critical equipment** such as interlocks and guards when using machinery.



NEVER

enter a **confined space** unless trained and authorised.

Fewer incidents, less injury, no fatalities.
A safer workplace for all of us.

ZERO HARM

2.0

Product Safety

Put safety first

Principles

- Everyone who works at Rolls-Royce shares responsibility for product safety.
- We are aware of the safety impact of our actions and accept that we all have a duty to protect and improve product safety.
- We prioritise safety-related tasks so they get the right attention, time and resource.

Group Policies
Product Safety

Additional Guidance
Safety Management System Manual

Contacts
Central Product Safety Assurance team
Local Head of Product Safety Assurance

We will:

- Be curious and take action to anticipate and identify potential product safety risks;
- Not act in any way that could have a negative impact on the safety of our products; and
- Assume positive intent and stay open-minded if others express product safety concerns, even if they are about our own behaviours.

Our product safety goal is to eliminate, as far as possible, the risk of product failure. This includes anything that could affect the safe operation of the Rolls-Royce product, the platform on which the product is installed, the people using or maintaining the product, or any long-term negative impact to the environment in which it operates.

What happens when...

Q I believe that the way a new product is being built might, under certain rare circumstances, lead to safety issues. It's a remote chance and the product is important to us and our customer so I don't need to say anything, do I?

A Yes! The safety of our products is vital to the lives and livelihoods of thousands of people, and our reputation and success depend on it. Always speak up about your concerns. All product safety concerns must be raised using relevant reporting processes to ensure the accountable person is made aware and can take appropriate action. Start by speaking to your manager. If you feel unable to speak to your manager, ask the next level of management or your local Head of Product Safety Assurance for advice. Or you can speak to your Local Ethics Adviser or raise the concern on the Rolls-Royce Speak Up Line. Whichever route you take, it is important to speak up.

Q I think I could make our safety processes even better. What do I do if I have feedback or concerns?

A Our procedures incorporate the very best safety practices, and ensure we are compliant with safety regulations. In the spirit of continuous improvement, any feedback and recommendations are welcome! Suggestions for improvement can be submitted in accordance with relevant processes in the management system.

2.0

Quality and product assurance

Put safety first

Principles

- We know that robust quality is essential to safety so we constantly strive to improve the quality and efficiency of our products and services.
- We always operate to all processes and procedures that safeguard the quality and safety of our products and services.
- We always work within our mandatory processes and procedures to ensure that our products and services, including those provided by our suppliers, meet the specification and customer requirements.
- We work together to continuously improve our processes and procedures.

Group Policies
Quality

Additional Guidance
Rolls-Royce Management System
Quality intranet

Contacts
Group Quality team
Local business/function Quality team
Process Owner/Lead Process User

We will:

- Actively identify, promote, and encourage ways to continuously improve the way we work; and
- Meet the high standards set out in the Rolls-Royce Management System and all processes and procedures that safeguard the safety, quality and reliability of our products and services.

What happens when...

Q I heard that our work really has to be 'good enough' not perfect, so I can work around the quality procedures. I can be more productive too, so that's a good thing, right?

A Wrong. Quality procedures are there to keep our work safe, reliable and to meet our customers' specifications. We can never compromise these. If you have any doubts, start by speaking to your manager. If you feel you can't, speak to the next level of management or your Quality point of contact.

Q I'm new to my area and I'm not sure which procedures I'm responsible for operating. How do I find out?

A Everyone needs to know all the procedures that guide their work, so they can do it right and be accountable for it. Ask your manager for a full briefing.

3.0

Do the right thing

15 ACCURATE BUSINESS RECORDS
17 ANTI-BRIBERY AND CORRUPTION
18 COMPETITION AND ANTI-TRUST
19 CONFLICTS OF INTEREST
20 DATA PRIVACY
21 EXPORT CONTROL AND IMPORT OBLIGATIONS
22 FRAUD
23 POLITICAL ACTIVITY AND TRADE ASSOCIATIONS
24 PREVENTING THE FACILITATION OF TAX EVASION
25 PROTECTING OUR BRAND AND REPUTATION
27 RESPECTING THE CONFIDENTIAL INFORMATION OF OTHERS
28 SAFEGUARDING OUR RESOURCES
29 WORKING TOGETHER



We support a culture of caring and belonging where we listen first, embrace feedback and act with integrity.

3.0 Accurate business records

Do the right thing

Principles

- We maintain accurate and complete records of our business dealings. These include all transactions between our business and external individuals and organisations, and all expenditure and labour charges.
- We act in line with the law and applicable technical and professional standards.
- We prepare our financial records on time, representing the facts accurately and completely.
- We maintain a rigorous system of financial, operational and compliance controls and an effective system of risk management.
- We do not engage in fraud, money laundering or tax evasion, nor do we facilitate the tax evasion of others.

A business record is any document or communication created or received in the course of doing business. For example, this includes financial records, quality records, legal records, travel and expenses records, or work booking records.

What happens if...

Q We're getting close to using up all our budget. I've been asked to move some costs to another department, as they have underspent this year. My manager has assured me this is above-board, should I make the adjustment?

A A: You can only move costs between departments or businesses when there is a valid reason (e.g. having completed work for the department). To ensure you aren't artificially manipulating results, double check the reason for the change with your manager.

3.0 Accurate business records continued

Do the right thing

We will:

- Keep all our records accurately, on time, and in line with local procedures. This includes expenditure, hours worked, transactions or any other aspect of our company's business;
- Complete product inspection and testing documentation accurately and honestly;
- Not influence others to do anything that would compromise the honesty and accuracy of our business records, reports, products or services;
- Not knowingly help our customers, suppliers or anyone else we work with to evade tax, that is, to fraudulently underpay or not pay tax;
- Not make a false or deliberately misleading entry in a report, record or expense claim or falsify any records we are asked to keep, including financial, safety, environmental or quality results; and
- Work within the Delegated Authority Levels for the approval of financial and other business decisions.

Group Policies
Quality

Additional Guidance
Approach to managing the Group's tax affairs
Preventing the facilitation of tax evasion
Group Finance Manual
Delegated Authority Levels
Travel and Expenses
Governance Framework

Contacts
Group Finance
Group Tax team
Corporate Security
Internal Audit (fraud)
Internal Control
Group Quality team
Governance team

What happens if...

Q We're really close to hitting our annual bonus – we're only off by a tiny amount. Is it ok if I tweak the financial record a little?

A We know a bonus would be nice, but you must maintain the records accurately. This is your responsibility and it's never right to change the records.

3.0

Anti-bribery and corruption

Do the right thing

Principles

- We do not tolerate bribery and corruption in any form.
- We never offer, give or accept anything of value that is, or could be seen as, improperly influencing business decisions.
- We only appoint partners of known integrity and require that their conduct meets our standards at all times.

Group Policies
Anti-Bribery and Corruption
Anti-Money Laundering

Additional Guidance
Offset Policy
Offset Procedure

Contacts
Ethics and Compliance team
Offset team

We will:

- Not give or receive bribes, and will report to the Ethics and Compliance team if we are asked for, or offered, bribes or facilitation payments;
- Only offer, or accept, gifts or hospitality allowed within policy; and
- Consult our Ethics and Compliance team about any business partners that we engage with to make sure that we are conducting the appropriate due diligence on the partner.

What happens when...

Q I get on very well with an external business contact. Can I take them out for a meal after a meeting?

A You may be able to have the meal if that is appropriate – for example, you are continuing your business discussion. But it is important that it should not be viewed as inappropriately influencing them. The Gifts and Hospitality Policy has details of the financial limits and when you need to get approval, as well as more general guidance on when it may not be appropriate to give or receive gifts or hospitality.

Q We need to use an intermediary to run an important negotiation, and I have someone lined up, but there's no time to get approvals. The deal is the important thing, isn't it?

A No. You cannot use an intermediary that is not approved through the Rolls-Royce due diligence process. Don't start to negotiate without a valid, approved contract in place, and ensure the person you had in mind does not act on behalf of Rolls-Royce. Contact your Ethics and Compliance team for help.

3.0 Competition and Anti-trust

Do the right thing

Principles

- We believe in open and fair competition.
- We conduct business in an honest and straightforward way.
- We always work within competition and anti-trust laws.

We will:

- Not make formal or informal agreements with competitors, trade associations or industry bodies which result in price fixing, bid rigging, market allocation and arrangements to limit supply. Arrangements like this are almost always illegal, and are often criminal;
- Not share commercially sensitive information with competitors, trade associations or industry bodies. This might include information about prices, ongoing bids, terms and conditions of sales, market share, costs or profit margins;
- Check carefully before we make agreements with trade associations, industry bodies, customers, joint venture partners or suppliers so we are clear about any existing restrictions on who they can sell to or buy from, and on what terms; and
- In markets where we might be said to have 'market power' (including some of our aftermarkets), take care over arrangements which might be seen unfairly to exclude competitors or exploit customers.

Additional Guidance
Competition and Anti-Trust Compliance Policy
Sector-specific guidance

Contacts
Legal team

What happens when...

Q An ex-colleague works for our competitor. When we were catching up socially, I mentioned we were bidding for a particular project but it wasn't a priority for us. He said it wasn't for them either. Have I told him too much?

A You should never discuss a bid with a competitor. Even a little bit of information like this could impact competition between us. Don't disclose anything else and discuss the situation with the Legal team.

3.0

Conflicts of interest

Do the right thing

Principles

- We avoid any situation where conflicts of interest might be seen as influencing our business decisions or behaviour, or which might stop us from acting in the best interests of Rolls-Royce.
- If we believe there is, or might be, a conflict of interest, we speak up.
- We work within all laws and regulations relating to the employment or engagement of current or former military and civilian government personnel, customers and competitors.
- We comply with all relevant insider dealing and market abuse legislation.

Group Policies

Conflicts of Interest

Inside Information and Share Dealing Policy

Contact

Ethics and Compliance team

Governance team

We will:

- Tell our manager about actual or potential conflicts of interest so that they can be managed;
- Not provide any services in a personal capacity to any actual or potential competitor, supplier, customer or other business partner, unless given approval in advance;
- Not place ourselves in a position where we manage or have the ability to influence business decisions relevant to a customer, supplier or other business partner in which we, a family member or close personal friend has a substantial interest;
- Not use non-public information for our own personal benefit, or pass this kind of information to someone else (either inside or outside the company) who isn't authorised to have it; and
- Not deal in Rolls-Royce shares in an unauthorised way or encourage others to do so.

What happens when...

Q My partner works for a company that supplies us with equipment. Recently I have been made responsible for managing contracts and buying services from this company. I feel a bit uncomfortable about it, should I ask for a transfer?

A You're right to be aware of the risk, as it could be a conflict of interest, depending on your partner's role in the company. Don't do anything until you've explained this to your manager or spoken with the Ethics and Compliance team, as it may just be a case of reporting the connection.

Q In my role, I have often dealt with military customers. One of them has asked me if he could get a job with Rolls-Royce after he leaves the armed forces. He has the right kind of skills for us, so can I help him?

A It's possible that any conversation about jobs with us would be seen as offering a benefit to a customer and trying to influence a decision. There are also laws and regulations in many countries about employing former military personnel which we have to follow. So do not discuss any employment opportunities with him, but suggest he looks at the recruitment areas of the Rolls-Royce website.

3.0

Data Privacy

Do the right thing

Principles

- We protect personal data, also known as personal information, in line with laws and company policies.
- We all have a responsibility to collect, use and (where required) disclose personal data in a way that keeps it secure and protected, preserving people's rights to privacy.

Group Policies
Data Privacy
IT Acceptable Use

Additional Guidance
Global Data Privacy Guidance
Data Privacy regional addenda

Contacts
Data Privacy team
Legal team
IT Security and Compliance team

We will:

- Use and protect personal data, in line with applicable laws, and our internal privacy policies and guidance; and
- Never give out anyone's personal data without making sure there is a lawful reason to do so.

What happens if...

Q To raise money for a Rolls-Royce community charity, we're holding a ball. We have organised a photo booth and photographer for the evening. We want to show people what a fun place it is to work so is it ok to share the photos from the ball on social media?

A You need to be careful when sharing personal data, like photos, on social media as there are laws to protect our privacy. Many people do not like pictures shared online. Before the event ask your manager if it's the right thing to do. You can also contact the Data Privacy team about the risks and how to stay inside the law.

Q When my manager was asking people to sign a get-well card for a colleague I overheard her talking about the details of their illness. It made me feel uncomfortable, knowing something so personal, and I'm not sure it's right.

A Personal data should never be shared without consent, or a legal reason. Even in the same company or team, only necessary personal information should be disclosed. Your manager means well, but unless they have consent to share this information they may have breached privacy laws and Rolls-Royce policy.

3.0

Export control and import obligations

Do the right thing

Principles

- The export and import of many of our products, technologies and services are subject to control. It's vital to our success that we comply with all applicable laws, regulations and procedures wherever we operate.

We will:

- Make sure we understand and act in accordance with the laws and regulations that apply to sanctions exports and imports. This includes those of other countries, when we are involved in any transfers;
- Make sure we know about and do not contravene national and international sanctions and our own destination policies;
- Not travel with a laptop or other device containing controlled technology unless we have authorisation from the Sanctions and Export Control team;
- Not travel with products or spare parts unless we have authorisation to export the items from the Sanctions and Export Control team, and we have made the required customs import declarations; and
- Be alert for suspicious enquiries from individuals, organisations or people acting on behalf of others who might be attempting to gain illicit access to our goods, software or technology.

Group Policies
Export Controls and Sanctions
Intellectual Property

Additional Guidance
Approach to managing the Group's tax affairs

Contacts
Export Controls
Group Tax team

What happens when...

Q We are in arrears to a customer on a part that is awaiting an export licence. I am visiting the customer next week. Surely it would save time and money if I took the part with me and sorted out the paperwork afterwards?

A No. We always work within import and export laws because breaching these laws could expose us to serious risks – it would undermine our credibility with the customer, might be a risk to national security and expose us to legal sanctions which would damage our reputation.

Q I need to send a drawing of a component to a new potential supplier. I'm aware that I need to get authorisation but don't know how to go about it.

A Start by preparing a detailed description of the transaction and talk it through with your local Export Point of Contact or experts in Export Controls, Security and Intellectual Property.

Q A customer has asked me to change the description of some goods on its shipping documents because it means they'll pay less tax on the import of those goods. They are a good customer and I don't want to upset them so this is ok isn't it?

A No. This could fall under 'facilitating tax evasion' and could result in a criminal prosecution for both you and the company.

3.0

Fraud

Do the right thing

Principles

- We are committed to the prevention and detection of fraud and will investigate any allegation of fraudulent activity. Fraud is a criminal offence, which we will not tolerate.

We will:

- Assess the nature and extent of our exposure to potential external and internal risks of fraud.
- Carry out a scheduled fraud risk assessment that is rigorous and documented.
- Apply due diligence procedures, taking a proportionate and risk-based approach, to mitigate identified fraud risks.
- Ensure that our fraud prevention policies and procedures are embedded and understood throughout the organisation, through internal and external communication and training.
- Regularly monitor and review our fraud prevention policies and procedures and make improvements where necessary.
- Require all individuals, regardless of position, title, or tenure, to remain vigilant and report any suspicions of fraud to their manager, a subject matter expert (e.g., Ethics and Compliance), the legal team, a Local Ethics Adviser (LEA) or the Speak Up Line
- Will investigate all allegations of fraud, and will take appropriate disciplinary and legal action, up to and including dismissal, recovery of losses and forwarding information to the appropriate authorities for prosecution.

Group Policies
Fraud

Additional Guidance
Fraud guidance document

Contacts
Ethics and Compliance Team
Legal Team

3.0

Political Activity and Trade Associations

Do the right thing

Principles

- We carry out political advocacy activities with governments and elected political representatives so that we can communicate with them about things that affect our business.
- When authorised to advocate on behalf of our business, we stay within all applicable laws and behave with integrity, honesty and transparency in all dealings with governments, their agencies and elected political representatives.
- We do not make corporate contributions or donations to political parties, or to any organisations, think-tanks, academic institutions or charities closely associated to a political party or cause.
- Our business has no preference for one political party over another.
- If we want to, we can take part in personal political activity or make personal political donations, outside Rolls-Royce, in our own time and using our own resources, except where existing local agreements or law dictates otherwise.

Political advocacy is activity to influence the actions, policies, or decisions of government ministers, officials, regulators and elected political representatives.

We will:

- Engage in political advocacy on behalf of our business only after authorisation from the Government Relations team in our region; and, if required in our country, after appropriate registration; and
- Not use our business time or resources for personal political activities, without specific prior authorisation.

What happens when...

Q I'm keen to run for a political position in my local community, is this ok?

A Yes, you can run for political office but must not use the Rolls-Royce brand or attribute your views to the business in your campaign or once you are in office. Any political activity during business time must be authorised. Speak with your manager for more information.

Group Policies
Political activity and trade associations

Contacts
Government Relations
Ethics and Compliance team

Additional guidance on specific country application of this section as applied to recognised Employee Representatives can be provided by the Regional HR Department.

3.0

Preventing the facilitation of tax evasion

Do the right thing

Principles

- We manage our tax affairs in accordance with our agreed approach.
- We do not help our customers, suppliers, or anyone else we work with, to fraudulently underpay, or not pay, tax.

Group Policies
Know Your Partner

Additional Guidance
Approach to managing the Group's tax affairs

Contacts
Group Tax team

We will:

- Only accept and raise invoices and other contractual documents which are true to our agreed commercial situation and which do not include false information; and
- Not undertake any other action or activity which is intended to assist anyone else engaged in tax evasion.

What happens when...

Q Our supplier has asked to change some invoices this month so they can categorise the supplies differently for tax reasons. They are the best supplier in the market, we have a great relationship with them and I can't afford to lose them, is this ok?

A Requests like this might seem reasonable, but it's not ok. You could be facilitating tax evasion and this may result in a criminal prosecution for both you and Rolls-Royce. Politely ask them to raise invoices with the correct amounts and descriptions of the supplies that have been made.

3.0

Protecting our brand and reputation

Do the right thing

Principles

- We all play our part in preserving and strengthening the reputation of our company to help our business achieve its strategic goals.

We will:

- Behave in a manner that maintains and reflects well on our brand at all times, using care and good judgement when speaking about our business, colleagues or stakeholders;
- Talk to Corporate Affairs before committing to, or carrying out any internal communications activity across functions, businesses, regions or the Rolls-Royce Group;
- Not speak to the media, politicians or members of the investment community about our business without first being given authorisation by Corporate Affairs;
- Not use internal and external social media to show information about the company and its stakeholders that is confidential, inappropriate, export controlled, commercially sensitive, inaccurate, vulgar, obscene, threatening, intimidating, harassing, libellous or discriminatory; and not use social media on behalf of the company in an official capacity without first getting written approval from Corporate Affairs;
- Protect our brand by following our brand guidelines; and
- Not permit our brand to be used by others – including our suppliers – nor create new brands, endorsed brands or sub-brands without first being given authorisation by Corporate Affairs.

What happens when...

Q A journalist has contacted me and wants to know about a new product. She has asked me for an interview, is this ok?

A A member of our Corporate Affairs team will be the official spokesperson on all Rolls-Royce issues – big and small. Even if you are an expert on the new product, before you agree to anything, ask the journalist to speak with our team first. You can find contact details on our website https://www.rolls-royce.com/media.aspx#section-contacts

Q We've just finalised a deal with a new supplier and I've been asked for a quote for their press release. Can I send them one?

A Our brand is recognised and regarded throughout the world so it is not surprising that suppliers want to promote that they work with us, but we must protect this valuable asset. It's important that you follow the Third Party Marketing and Publicity Process to determine if they can share this deal with the media.

3.0

Protecting our brand and reputation continued

Do the right thing

Group Policies
IT Acceptable Use Policy
Sponsorships and Donations

Additional Policies/Guidance
Third Party Marketing and Publicity Process
Rolls-Royce brand guidelines
Rolls-Royce brand architecture guidelines

Contacts
Internal Communications
External Communications
Investor Relations
Trademarks team

Additional guidance on specific country application of this section as applied to recognised Employee Representatives can be provided by the Regional HR Department.

What happens when...

Q We've just finalised a deal with a new supplier and they want to put our logo on their website/marketing materials. Can I send it to them?

A Our brand is recognised and regarded throughout the world so it is not surprising that suppliers want to promote that they work with us, but we must protect this valuable asset and prevent it being misused. Please contact brand@rolls-royce.com who will be able to advise you.

Q My team has just completed an incredible project and it would make great material for an advertising campaign or a trade press release. How can I publicise our work?

A We'd love to hear about your achievements. Please share your success with the Marketing and Communications team within your business unit or directly with the Director of External Communications within Corporate Affairs if you are in a central function (such as IT, Finance or HR). They can advise on potential next steps.

3.0

Respecting the confidential information of others

Do the right thing

Principles

- We protect the confidential information we hold, including data from customers, suppliers, joint ventures and other partners. We only share and use it internally to the extent that we are permitted to, and we never share it externally without authorisation.
- We never use illegal or dishonest methods to get information.
- We do not try to find or use the information of other people or organisations, including competitors, that we know is confidential or restricted.

Group Policies
Confidential information

Additional Guidance
Competition and Anti-Trust Compliance Policy

Contacts
Ethics and Compliance team

We will:

- Keep all documents, or any form of information we've been given in confidence secure, in line with business procedures and any appropriate laws;
- Not try to find or accept confidential information about other organisations or people without their permission;
- Not try to get access to classified information if it is not required for legitimate business purposes or if we are not authorised to have it; and
- Not share confidential information belonging to an external person or organisation without that person or organisation's permission. This includes sharing the information internally.

What happens when...

Q I was negotiating with a customer on a recent sales visit, and he gave me a copy of our competitor's price list to persuade me to lower our price. This could be useful information for us, can I use it?

A No. Competitor pricing information which is not publicly available is not ours to use, regardless of whether a customer gave it to you. Do not use it and contact your Ethics and Compliance team as soon as possible. It may be necessary to tell the competitor we have their information, remove you from any sales activity or even to withdraw Rolls-Royce from the process entirely.

Q I am managing a supplier tender process and am under pressure to cut costs. I have chosen a preferred supplier who I know is also used by one of our joint ventures. Can I benchmark their price by checking what our joint venture is paying?

A No. The supplier's agreed pricing with the joint venture is confidential. Although Rolls-Royce owns part of the joint venture, this information belongs to the supplier and the joint venture company and not Rolls-Royce.

3.0

Safeguarding our resources

Do the right thing

Principles

- Our technologies, intellectual property and commercially sensitive and confidential information are vital assets of our business and we protect them from unauthorised access, use and disclosure.
- We take individual responsibility for the proper use of our business property, including IT systems, materials, places of work and equipment.
- We will not use our systems to access, copy, store or transmit anything considered to be offensive, obscene or inappropriate, or anything that we do not have permission to deal with.

Group Policies
Security and Resilience
IT Acceptable Use
Confidential Information
Intellectual Property

Additional Guidance
IP in the Rolls-Royce Management System

Contacts
Corporate Security
IT Security
Intellectual Property

We will:

- Keep all data and documents secure;
- Only use our resources for business purposes, unless we've been authorised. We will maintain them with care, avoid waste and protect them from theft or damage;
- Not try to benefit from the use or sale of company property without authorisation; and
- Not try to go around or ignore IT security controls or physical security systems.

What happens if...

Q I'm really proud of an invention I've developed at Rolls-Royce. It could change the way we do things here and I think I should get it patented. I've started talking to a friend who is a lawyer about it, is this ok?

A Patent applications may not be accepted if you disclose the invention first. If you have created something novel and beneficial to Rolls-Royce speak with our Intellectual Property team. They can guide you on whether you should apply for a patent and what to do next.

Q I have a Rolls-Royce laptop and often work at home. My son's computer is broken and he needs access to use the internet for school. Is it ok for my son to use my laptop?

A It's understood that you might sometimes need to use your laptop for personal use. But our systems are for business purposes, so keep this to a minimum and ensure that it does not interrupt or conflict with your ability to get your work done. And of course, accessing illegal, offensive or inappropriate material is never ok. Read the IT Acceptable Use Policy for more information.

3.0 Working together

Do the right thing

Principles

- We are open and honest in all our relationships and we work globally and expect mutual respect, consideration and collaboration between all our people.
- We engage and involve our people in improving the business and welcome feedback.
- We rely on a non-discriminatory workplace and we will not tolerate bullying, harassment or discrimination of any kind.
- We ensure a zero-tolerance approach to discrimination based on age, disability, gender (including identity, expression and reassignment), marital or civil partner status, parental status (including maternity and paternity status), race, nationality, ethnic or national origin, religion or belief, sexual orientation or any other personal characteristic.
- We encourage regular and effective conversations with managers, and to give and ask for feedback, so we can all be our best.
- Our company will reward us fairly, taking into account our individual contribution and behaviour.
- We resolve disputes fairly.
- Deciding whether or not to join a trade union is our own choice. Our company will respect the collective representation and consultation processes and laws in the countries where we work.

What happens when...

Q We've been asked to work on a really important project with a very short deadline. I know that we may have to work long hours to get it done. The parents in my team have to leave early for the school run, so I'm only going to ask people without children to be a part of the project team. Is this ok?

A This is not ok. Be curious and ask the team who can support – the parents may have a great support network and can do work later at night once the school run is done. Diversity makes us more innovative, helps to prevent group think and ensures you get the best result for the project and for Rolls-Royce.

Q One of my colleagues always makes 'jokes' about my appearance and keeps asking me for meetings alone that we don't need. It makes me feel uncomfortable, but my manager said it's just banter and that asking him to stop would hurt his feelings. Am I making a fuss out of nothing?

A We take allegations of harassment seriously and it is not ok to feel uncomfortable at work. If you have already spoken to your manager and it hasn't been resolved, speak with Human Resources. They will help you navigate the next steps.

3.0 Working together continued

Do the right thing

We will:

- Strive to do our best work, in the right way, seeking support and feedback when we need it;
- Not supervise or influence the recruitment, promotion, reward or benefits of a family member, close friend or someone with whom we are in a relationship;
- Support and promote our team members' development, managing underperformance effectively;
- Take seriously any concerns raised, and follow up appropriately, treating those who have raised them with fairness and without prejudice; and
- Ensure we have the right work authorisation when travelling abroad on business, and where a local personal tax liability arises, discharge these obligations on a timely basis.

Group Policies
Equal Employment Opportunity
Dignity and Respect
Conflicts of Interest

Additional Guidance
Your HR intranet site
Communications and Engagement Guide
Immigration
International Assignments

Contacts
Employee Hub
Your People Partner
Local Diversity and Inclusion contacts

What happens when...

Q We're close to the end of the quarter and it looks like we won't meet our target unless we really push. I'm stressed and need my team to work harder, so it's understandable that I yell sometimes, isn't it?

A As a manager, you're expected to set challenging targets but it is never ok to bully or intimidate to achieve them. Yelling rarely motivates; instead try to analyse what's stopping your team from achieving their goals and support their efforts to overcome this. If there are team members who genuinely need performance improvement, support and manage this appropriately.

Q I have been in my role for 18 months now and am still waiting for my first performance check-in. I've spoken to my manager, but we're all so busy that it hasn't been scheduled. Is this ok?

A Regular check-ins are vital for your development and your manager is responsible for scheduling these regularly. Ask your manager again for a regular session to be arranged, and if you still need support ask Human Resources for help.

Q I'm a manager and someone in my team has come to me with a complaint. Should I send them to Human Resources?

A Complaints and grievances should be resolved as soon as possible. First speak with the team member and try to resolve the issue together. If this doesn't work, speak with Human Resources. They will help you navigate the process in your location.

Q My daughter has just been employed as a Rolls-Royce engineer in Canada. I work for Rolls-Royce in the US. Is this a problem?

A Not all family relationships will automatically be a conflict of interest, it depends on whether either of you are in a position to influence future opportunities or benefits the other receives. You should disclose your daughter's employment as a potential conflict of interest. Speak with your line manager to get this process started.

4.0

Make a difference

32 WORKING WITH OUR CUSTOMERS, SUPPLIERS, PARTNERS AND COMMUNITIES

We think about the business impact of our decisions and challenge ourselves to deliver excellence and efficiency every day on the things that matter.



4.0 Working with our customers, suppliers, partners and communities

Make a difference

Principles

- We treat all our customers, suppliers and partners with fairness, honesty and respect, and build relationships that work for all parties, no matter what the transaction is worth or how long it lasts.
- We support communities in areas of education and skills, environment, social investment and arts, culture and heritage. Our investment can include financial, time or in-kind support.
- We compete fairly and with integrity on sales campaigns and bids for external research funding.
- If we employ people who have recently worked for government, a competitor or a customer we will not involve them in sales activities if that might give us an unfair advantage.
- When seeking new suppliers and partners we conduct appropriate due diligence. We take steps to only choose suppliers and partners whose values and business behaviour meet high ethical, human right and environmental standards.
- We are opposed to any form of child labour, or any practices that hold back the development of children. Employment should be freely chosen, so we'll never use forced or involuntary labour.

When working with customers – we will:

- Make sure that all our bid preparations, contract negotiations and communications with customers are accurate and true;
- Set out clear terms in our contracts with customers and operate in line with them;
- Not accept information about a competitor's proposal in a sales campaign;
- Not accept internal government information on its selection process unless the government's contracting officer has specifically and lawfully authorised its release; and
- Strive to continuously improve quality, delivery, responsiveness and reliability to build high levels of customer satisfaction.

What happens when...

Q A friend who works for a competitor has given me information about a sales campaign that Rolls-Royce is also involved in. It would give us a great opportunity to beat them to this contract so should I use it?

A No, do not use this information; using it is unfair competition and unethical. Immediately discuss this with your manager and contact the Ethics and Compliance team for guidance.

Group Policies
Anti-Bribery and Corruption
Conflict of Interest
Gifts and Hospitality
Know Your Partner

Additional Guidance
Preventing the facilitation of tax evasion
Competition and Antitrust Compliance Policy and sector-specific guidance
Our customer intranet site

Contacts
Director Customers and Service
Ethics and Compliance team

4.0 Working with our customers, suppliers, partners and communities

Make a difference

When working with our suppliers and partners – we will:

- Communicate clearly and honestly with our suppliers and partners, while taking care to protect intellectual property and any confidential information;
- Make sure that all our bid preparations, contract negotiations and communications with suppliers and partners are accurate and true;
- Follow our supplier selection processes to make sure that suppliers are chosen fairly;
- Set out clear terms in our contracts with suppliers and partners and operate in line with them, making sure all communications are accurate and true; and
- Follow all our quality and safety processes and procedures to safeguard the quality, safety and reliability of our products and services. If we have any concerns, we deal with them together with our suppliers and partners, finding solutions that work for both of us.

Group Policies
Human Rights
Anti-Bribery and Corruption
Data Privacy
Intellectual Property
Product Safety
IT Acceptable Use
Conflict of Interest
Gifts and Hospitality
Know Your Partner

Additional Guidance
Supplier Code of Conduct
Supplier Health, Safety and Environment Policy
Safety Management System Manual
SABRe
Competition and Anti-Trust Law Compliance Policy
Preventing the facilitation of tax evasion

Contacts
Procurement
Ethics and Compliance team

Human Rights
We recognise our responsibility to respect Human Rights. We are committed to protecting and preserving the rights of our employees, those employed in our supply chain and those affected by our operations.

What happens when...

Q One of the suppliers we use has given me a really competitive price, though this seems to be because their pay is low – possibly below the legal minimum. It's good for us, but I'm not sure I'm happy.

A You should discuss your concerns with your manager and the manager responsible for this supplier. We are committed to making sure that our suppliers do not unlawfully exploit their employees.

Q I saw an email that makes me think one of my colleagues might be doing some kind of deal with a supplier to say that they are providing a service that we don't actually get. I might be wrong, what should I do?

A You are right to be concerned about protecting our company. Immediately report the matter in accordance with the guidance in the Speaking Up section.

4.0 Working with our customers, suppliers, partners and communities

Make a difference

When working with our communities – we will:

- Make sure that all charitable contributions and social sponsorships, which may be given in time and gifts-in-kind as well as money:
  - sit comfortably within our policy and have been approved and reported;
  - are legitimate, appropriate and proportionate;
  - can't be interpreted as trying to influence the giver or the receiver (e.g. be seen as bribes) and
- Not use the company's funds or assets for political donations.

Group Policies
Sponsorships and Donations

Additional Guidance
Conflicts of Interest Policy
Gifts and Hospitality Policy
Know Your Partner Procedures
Sponsorships and Donations Standards
Corporate Contributions Tool
CC&SS Governance Accountabilities
CC&SS Impact Matrix

Contacts
Central Community Investment team
Local community investment contacts
Ethics and Compliance Team

Why do we invest in our communities? Because it supports our future success by:

- **Helping us to attract, recruit and retain the best people with the right skills from many different backgrounds, particularly by investing in the skills we need;**
- **Providing us with opportunities to engage with each other and develop our skills and behaviours while we have a positive impact in our communities; and**
- **Helping to show our customers, investors and other stakeholders the kind of company we are.**

What happens when...

Q Can I get support to help my local charity?

A We do support not-for-profit organisations including charities, schools and community groups. Many contributions are in time and gifts in-kind, as well as financial donations. Make sure these sit within our Charitable Contributions and Social Sponsorships Policy, have a legitimate purpose, and are approved by your line manager. Talk to the Community Investment team if you need more advice.

Q A customer has asked me if Rolls-Royce will make a donation to its charity as part of our bid. The charity looks legitimate so can I do this?

A Even if this is a legitimate charity, the connection between the proposed donation and the bid could mean that this is seen as a bribe. You should politely decline.



This document replaces the At Our Best: Our Code dated December 2025 and will be periodically reviewed and updated. Printed copies may not be up-to-date. Please refer to https://ourcode.rolls-royce.com/ to ensure you are accessing the up-to-date version of Our Code.

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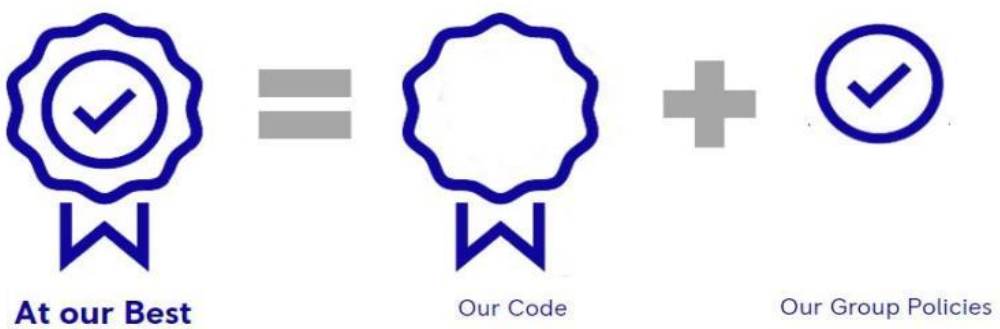
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At our best:
our Group
policies

Our responsibilities

The choices we make and the things we do must be guided by our Behaviours of "Put safety first", "Do the right thing" "Keep it simple" and "Make a difference".

- We want everyone to be at their best in line with our behaviours when they come to work.
- With our personal filters our behaviours will mean something different to each of us. To ensure we have a consistent understanding our Code supports our understanding of what it means to live our behaviours, supported by our Group Policies which provide the details of what we do to live up to the expectations of our Code.
- Our behaviours, Code and Group Policies form a key part of the Rolls-Royce Framework. All of them are mandatory, so need to be understood and followed by everyone at Rolls-Royce. By doing so, and helping each other do so, we will together ensure that we can be at our best.
- Our Code and Group Policies may not have all of the answers to every situation we may face but they set out our principles and how they apply to our business activities, to guide our decision-making and direct us where to go for additional guidance and help. If in doubt find out!
- These Group Policies have not yet been approved for use in Rolls-Royce Power Systems by the Rolls-Royce Solutions Works Council. Discussions are ongoing and Rolls-Royce Power Systems employees should continue to refer to the existing Rolls-Royce Power Systems GLPs in the meantime. The Rolls-Royce Power Systems GLPs are included in the Additional Guidance section of each relevant Group Policy.



Whatever our role, we hold the reputation of Rolls-Royce in our hands. By doing the right thing, we safeguard our reputation as a trusted business, and make this a company where we can be at our best.

Who does it apply to

- All of us. That is all colleagues employed by the Rolls-Royce Group and any subsidiary or joint venture where we have control. We also encourage all our joint ventures and partners to adopt the same high standards.
- In the event of a conflict between our Code or Group Policies and any local laws, the local laws shall apply. Where our Code or Group Policies impose a higher standard or more onerous requirement than local laws, the requirements of our Code and Group Policies shall apply.
- Our Code and Group Policies may be further supported by additional and mandatory procedures, guidance notes, requirements and local policies which you can find listed in the "Guidance" section for each Group Policy.

We all have a responsibility to:

Leaders have a responsibility to:

Our responsibilities

Who does it apply to | We all have a responsibility to: | Leaders have a responsibility to:

- be accountable for our actions;
- be aware of the shadow we cast and lead by example to promote and display the highest standards of integrity and professionalism;
- consider how our decisions and actions affect those around us and make sure everyone has the help and support they need;
- create an environment in which everyone feels safe to speak up, treating those who speak up with fairness and without prejudice;
- be open to receiving improvement ideas or concerns, ensuring they are taken seriously and followed up appropriately;
- ensure we have access to our Code, our Group Policies and other policies relevant to our role or place of work; and
- complete all mandatory learning to further help develop our understanding of our values, principles and policies.

Who does it apply to | We all have a responsibility to: | Leaders have a responsibility to:

- live our Leadership Expectations;
- use the Leadership Toolkit to help support them in addition to our Code and Group Policies; and
- cast the right shadow and lead by example in following our Code and Group Policies and ensure that their teams receive regular messages to comply with our Code and Group Policies.

Our responsibilities

Supporting everyone

Everyone will always be supported for living up to our values and behaviours, Code and Group Policies, even if sometimes that means the Company may lose business or suffer another disadvantage. The choices we make and the things we do must be guided by our values and behaviours.

Consequences

We are proud of what we do and the principles we set for ourselves in our Code and Group Policies. Therefore, we will take appropriate action against anyone who does not live up to these principles, values and behaviours or breaches our Code or any of our Group Policies.

This may result in disciplinary action up to and including dismissal. Breaches of our Code and Group Policies could also lead to individual criminal sanctions and criminal penalties for Rolls-Royce.

Speak Up Policy



Principles

- We are dedicated to creating an environment where employees can speak up without retaliation.
- We treat any suggestion of retaliation against individuals who speak up extremely seriously. Such retaliation could lead to disciplinary action up to and including dismissal.
- We allow anybody to use our speak up channels to raise concerns related to Rolls-Royce whether or not they are an employee.
- The Speak Up Line enables individuals to raise concerns confidentially and anonymously in their own language via the telephone or online. It is managed by an external company and concerns received are sent to the Ethics and Compliance team who work with relevant Subject Matter Experts to resolve.
- We ensure that all concerns are appropriately investigated and we aim to conclude investigations within 60 days.



We

- speak up if someone is acting or something is not in line with our Code or Group Policies;
- try to resolve issues informally, where possible, by speaking with the appropriate individual(s);
- are aware of the four main speak up channels we can use:
    - Leaders;
    - Subject Matter Experts (SMEs);
    - Local Ethics Advisers (LEAs); and
    - the Speak Up Line (www.rrspeakupline.com);
- listen and take action if someone speaks up to us;
- only use the speak up process for raising genuine concerns. We understand that:
    - it is not acceptable to misuse the speak up process for raising false claims or pursuing vendettas; and
    - the speak up process is not designed to be a route of appeal from other established processes (such as grievance and disciplinary processes); and
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Speak Up Policy

Leaders

In addition to the general expectations of leaders set out in the introduction to our Code and Group Policies, leaders:

- recognise their role as a Speak Up channel;
- listen when someone speaks up to them and prioritise resolution of the issue raised. Leaders can use the Leadership Toolkit for support with this;
- ensure they support the speak up investigation process where required;
- ensure feedback is provided to someone that has spoken up; and
- regularly talk with their team about the importance of speaking up.

Our Code | Additional Guidance | Contacts

Take a look back at our Code principles related to this policy:

- Speak up section
- Fraud section

Our Code | Additional Guidance | Contacts

- Speak Up Procedures
- Speak Up pages on Engine Room
- Leadership Toolkit – Speak up
- Fraud Policy
- Speak Up Line
- GLP 026 – Global Anti-Bribery and Corruption Guideline

Our Code | Additional Guidance | Contacts

- A Leader
- Relevant subject matter experts - the "Contacts" sections in our Code and Group Policies are there to help guide you to the right person.
- Your Local Ethics Adviser
- Speak Up Line
- Corporate Ethics and Compliance team (who oversee our speak up process and manage the Speak Up Line)
- Your business Ethics and Compliance team

Health, Safety and Environment Policy

Principles

- We are committed to taking care of our health, our safety and the environment, operating safely and creating an environment where each of us can be at our best.
- We care about each other, recognising that a safe and healthy workplace, that also minimises our environmental impact, is a better place for our people, our customers and our business.
- We believe a positive health, safety and environmental (HSE) culture, where HSE is integrated into how we work every day, to be fundamental to the success of our business.
- We ensure employees are provided with information, instruction and training to meet the expectations of the HSE Management System.
- We put safety first, expecting the highest standards of behaviour for protecting our own and others' health and safety and the environment.
- We take personal and collective responsibility, along with our suppliers, contractors, joint ventures and other partners, to:
    - operate safely in all our business activities and operations;
    - Create a working environment that supports employee physical and mental health and wellbeing, with an aspiration towards zero work-related ill-health, accidents or harm to people; and
    - prevent or minimise any adverse environmental impact from our activities, products and services, support the sustainable use of resources, and strive for no environmental incidents.

We

- expect our leaders to take accountability for ownership of HSE risk management;
- collectively take accountability to reduce HSE risks and impacts throughout our activities, products and services;
- integrate HSE into our business processes and decision making;
- meet the requirements of our HSE Management System, ensure compliance with legal and other requirements and drive towards best practice;
- speak up if concerned about an activity or decision, including stopping work that we think may be unsafe;
- commit to engaging and communicating openly with all key stakeholders and to driving continual improvement through appropriate targets, limits and goals.
- believe that high levels of HSE performance are fundamental to doing business with our customers, delivering value for our shareholders and supporting the sustainability goals, aspirations and expectations of the communities in which we work; and
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Health, Safety and Environment Policy

Leaders

Our general expectations of leaders in relation to Our Code and Group Policies are set out in the introduction.

Our Code | Additional Guidance | Contacts

Take a look back at our Code principles related to this policy:

- Health, Safety and Environment section

Our Code | **Additional Guidance** | Contacts

- For more information including related Group procedures, control standards and guidance see the HSE Engine Room pages
- Speak Up Policy
- GLP 017 – HS&E Policy and Principles (RRPS)

Our Code | Additional Guidance | **Contacts**

- The HSE team
- Your local HSE representative

Product Safety Policy

Principles

- The safety of our people and products and supporting each other to speak up is our number one priority – we Put Safety First.
- Everything we deliver to a customer is our product - hardware, software, services and documentation, whether delivered separately or integrated into systems.
- Five principles guide our approach to product safety and promote a positive safety culture:

    1. Leadership commitment and accountability
    2. Deliver the required level of product safety
    3. Maintaining and improving product safety
    4. Conforming product
    5. Safety awareness, competence and responsibility

- The product safety principles are the foundation of our Product Safety Management System which is governed by the Company Product Safety Assurance Board.

We

- Ensure Leadership commitment and accountability by:
    - championing the safety-first behaviour so that safety-related tasks get the right attention, time and resource;
    - ensuring safety considerations are integrated into business decision making, strategic planning and day to day operations;
    - making accountability for product safety clear and ensure people understand what they are accountable for; and
    - ensuring our people are competent in the roles they perform and that they understand the Rolls-Royce Product Safety Policy and Rolls-Royce mandatory processes and standards and can fulfil their collective and personal responsibility.
- deliver the required level of product safety by:
    - designing, making, maintaining and operating our products to achieve a high level of safety consistent with their application, always meeting or exceeding relevant company, legal, regulatory and industry requirements;
    - assessing what could go wrong and putting controls in place to meet or exceed the required safety levels throughout the product lifecycle, and to manage the safety risks to a level that is as low as is reasonably practicable; and
    - proactively evaluating how human and organisational factors can introduce risks to product safety and using our understanding when setting our controls;
- maintain and improve product safety by:
    - jointly taking responsibility for product safety and being mindful of the safety implications of our actions
    - remaining vigilant and always speaking up about product safety concerns in the knowledge that our company is committed to treating everyone fairly and without prejudice (Speak Up Policy);
    - setting targets, measuring our performance and rigorously investigating and resolving safety related issues, systematically embedding the learning from these back into our practices and processes;
    - actively engaging in setting industry standards and good practice and implementing appropriate external good practice.;
    - developing and delivering innovation in our product designs and manufacturing capabilities, as well as maintenance and operating procedures that support improvement in product safety; and
    - proactively updating and improving our mandatory processes and standards so that they remain fit for purpose as our products change and our technical understanding grows.

Product Safety Policy

We

- deliver conforming, compliant product by:
  - ensuring have access to, understand and follow our mandatory processes and standards;
  - requiring our supply chain to work to appropriate processes and standards and assuring that they do so;
  - characterising product to assure conformance, and where non-conformance is detected segregating and managing that product to ensure it is not shipped; and
  - controlling change throughout the product lifecycle.
- establish and maintain safety awareness, competence and responsibility by:
  - developing competence standards, describing the skills and training required to carry out a task (ensuring the correct support is supplied);
  - proactively updating and improving our training, opportunities for experience and competence standards so that they remain fit for purpose as our products change and our understanding grows.
  - speaking to our leader in the first instance if we are being asked to do something which we do not feel qualified or experienced enough to do;
  - Maintaining our awareness of our own individual fitness to operate, not undertaking any safety-related task when impaired e.g., when tired or distracted;
  - developing and attending safety training suitable for our roles; and
  - actively promoting and talking about product safety.
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Product Safety Policy

Leaders

Our general expectations of leaders in relation to Our Code and Group Policies are set out in the introduction.

Our Code | Additional Guidance | Contacts

Take a look back at our Code principles related to this policy:

- Product safety section

Our Code | **Additional Guidance** | Contacts

- Product Safety Management System Manual
- Product Safety Engine Room pages
- Speak Up Policy
- Product Safety Training Courses
- GLP 016 – Product Safety Policy (Power Systems)
- Specific Product Safety Policies

Our Code | Additional Guidance | **Contacts**

- Head of Product Safety Assurance

Product Security Policy



Principles

- Product security refers to the ability of our products to be resilient to cyber security threats throughout the product's life.
- Our products are Secure-by-Design. Security is designed-in rather than bolted-on.
- We deliver Defence-in-Depth, harnessing multiple defence mechanisms to provide multi-layered protection.
- Our approach to product security is proportionate and risk-based, reconciling functionality and performance with appropriate levels of protection.
- Our security measures are designed to prevent product safety from being compromised as a result of security threats.



We

- integrate product security into our working practices across the organisation (as we do for safety) in order to protect our business (safety, reputation, operation) and our customers (their safety, mission and operation);
- adopt an holistic approach to ensure our products (and the engineering tools/infrastructure which support them) are cyber resilient throughout their lifecycle;
- ensure our products are As Secure as Reasonably Practicable;
- ensure our products meet or exceed the cyber security requirements for their respective legislative environments;
- ensure appropriate cyber-physical security measures and monitoring mechanisms are active before product delivery;
- engineer our systems to minimise the impacts of a cyber security attack;
- create products that can evolve and are designed to be resilient both now and in the future;
- speak up about any concerns regarding the cyber security of a product; and
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Leaders

In addition to the general expectations of leaders set out in the introduction to our Code and Group Policies, leaders:

- help their teams understand and meet their obligations in respect of product security;

Product Security Policy

Leaders

- ensure we have appropriate skills, tools and guidance to take account of product security in our work; and
- communicate good practice and lessons learned so that we can continually improve in this area.

Our Code | Additional Guidance | Contacts

Take a look back at our Code principles related to this policy:

- Product safety section
- Quality and product assurance section

Our Code | Additional Guidance | Contacts

- Guidance document – Product Security on Engine Room
- Cyber Fortnight – Product cyber security
- Product Safety Policy
- Security and Resilience Policy
- Speak Up Policy
- GLP 043 – Product Security Policy

Our Code | Additional Guidance | Contacts

- The Business Product Security team
  - For queries specific to your programme or area
  - For any specialist queries you might have
  - For advice on tools, skills and relevant training
- Your Local Cyber Point of Contact
  - For general queries and advice

Quality Policy

Principles

- Rolls-Royce upholds a global reputation for quality as one of the leading technology companies in the world, providing power solutions and services.
- In order to uphold our reputation and competitiveness we must make sure our whole organisation is effective in consistently delivering our commitments at the level of quality expected by our customers, employees, shareholders, suppliers and communities.
- Our Rolls-Royce Management System (RRMS), launched across the Group in 2021, is the foundation for meeting our commitments consistently. It underpins key aspects of personal and product safety. More than just a process landscape, it is our systemised way of working, enabling the Company to operate with agility and efficiency in a forever changing world.
- The RRMS, its digital platform and the methodology on which it is based:
  - is fully aligned with our strategic direction;
  - is easily accessible and applies to everyone across the Company;
  - enables us to provide solutions, products and services that satisfy all our customer, regulatory and statutory requirements;
  - is a baseline for continuous improvement;
  - is the single source of truth and connects all working procedures, standards and systems we are required to follow; and
  - enables us to deliver on our Values.
- We focus our quality objectives to satisfy our tactical and strategic needs.
- Every employee has the accountability for delivering on their commitments, maintaining compliance and for ensuring that the expected level of quality is achieved.
- We are all the first line of defence for assuring quality, proactively shaping the RRMS to reduce risk and drive efficiency and effectiveness.
- We adopt industry standard and other good practice, recognise synergies and accommodate these where appropriate.
- We measure the performance of our processes, systematically embedding the learning from this back into our RRMS, working practices and organisational capability.
- We ensure that our suppliers are approved and managed using our RRMS and that they understand our expectations for confidence and consistency in quality.

We

- familiarise ourselves with the RRMS to understand those processes and any other associated working standards or instructions which are applicable to us, and follow them;
- understand our contribution to the effectiveness of the RRMS (including any associated working standards or instructions) and proactively engage in continuous improvement;

Quality Policy

We

- understand the benefits of improved quality performance, recognising the potential consequence of non-compliance;
- speak up, whether we work in an office, a factory or any other location if we feel we are not meeting our quality commitments and requirements or that we cannot comply with the RRMS; and
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Leaders

In addition to the general expectations of leaders set out in the introduction to our Code and Group Policies, leaders:

- encourage employee feedback to improve quality performance and by speaking up to report problems, issues, or any concerns relating to quality;
- ensure their teams understand the contribution they make to both quality and the effectiveness of the RRMS;
- when launching task and embarking on improvement, start by reviewing the RRMS;
- when completing a task or improvement, ensure any learning has been fed back into the RRMS and any other associated working standards or instructions; and
- provide the knowledge, tools and guidance to help everyone play their part in achieving the required level of quality.

Our Code | Additional Guidance | Contacts

Take a look back at our Code principles related to this policy:

- Quality and product assurance section

Quality Policy

Our Code | Additional Guidance | Contacts

- GBS Quality Engine Room pages
- Rolls-Royce Management System
- ARIS
- BIC (Power Systems)
- Civil Quality Engine Room pages
- Defence Quality Engine Room pages
- Defence ‘Quality Situations’ – Our Quality Culture
- RRMS ‘Behaviours to make it work’
- RRMS Behaviours Facilitators Guide
- Speak Up Policy
- GLP 015 – Quality Policy and Principles

Our Code | Additional Guidance | Contacts

- Peter Smart – Head of RRMS Revolution Centre of Excellence (peter.smart3@rolls-royce.com)

Substance Misuse Policy

Principles

- The misuse of alcohol, drugs, solvents, over-the-counter medication and other substances can jeopardise the health and safety of our employees and those affected by our activities and our company's reputation.
- This policy supports a working environment free from the effects of alcohol and substance misuse. It is not concerned with the proper use of legally prescribed medication, nor with sensible and responsible social use of alcohol outside of the workplace.

We

- do not consume alcohol before or during working hours or during meal or rest breaks or come to work under the influence of alcohol;
- do not consume illegal or psychoactive substances on site, have them in our possession or attend work under their influence;
- tell someone at Rolls-Royce, such as our leader, if we believe we have a problem with alcohol, drugs and/or other psychoactive substances;
- follow local health and safety procedures when working with solvents in the workplace;
- accept that we may be asked to take a drug and/or alcohol test;
- do not misuse prescribed or over-the-counter medication, nor illegally hold, sell, distribute or illegally use prescribed medication in the workplace;
- tell someone at Rolls-Royce, such as our leader, if we are taking prescribed or over-the-counter medication which can cause drowsiness or impair our ability to drive or complete other safety critical activities. This will help ensure we do not put ourselves or others at risk in the workplace; and
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Substance Misuse Policy

Leaders

In addition to the general expectations of leaders set out in the introduction to our Code and Group Policies, leaders:

- understand the effects of misusing alcohol, drugs and other substances, including how to recognise the signs of misuse in the workplace;
- actively manage evidence of alcohol or substance misuse in the workplace;
- know how to access workplace drug and alcohol testing services if required;
- support employees who report problems with alcohol or substance misuse; and
- manage employees who are prescribed medication which can impair their ability to undertake safety critical activities including driving.

Our Code | Additional Guidance | Contacts

Take a look back at our Code principles related to this policy:

- Health, Safety and Environment section
- Life saving rules

Our Code | Additional Guidance | Contacts

- People Engine Room Pages
- Speak Up Policy

Our Code | Additional Guidance | Contacts

- Your local HR representative
- Your site HSE team
- The GBS Health and Wellbeing Team

Anti-Bribery and Corruption Policy

Principles

- We do not give or receive Bribes. Bribes can be cash, G&H, Charitable Contributions, sponsorships, jobs and other benefits provided to decision makers or individuals connected to them.
- We do not make Facilitation Payments.
- We do not penalise anybody if their refusal to pay Bribes or Facilitation Payments causes a loss of business or business interruption.

We

- do not give, offer, request, accept or authorise Bribes;
- do not offer, make or authorise Facilitation Payments unless there is a threat to our health, safety, freedom or property (or that of family, colleagues or travel companions);
- report all requests for Bribes or Facilitation Payments to our Line Manager and our business Ethics and Compliance team; and
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Leaders

In addition to the general expectations of leaders set out in the introduction to our Code and Group Policies, leaders:

- support their teams in maintaining our zero tolerance approach to bribery and corruption even if this could lead to loss of business or business interruption.

Our Code | Additional Guidance | Contacts

Take a look back at our Code principles related to this policy:

- Anti-Bribery and Corruption section
- Fraud section

Anti-Bribery and Corruption Policy

Our Code | Additional Guidance | Contacts

- Facilitation Payments Guidance
- Anti-Bribery and Corruption (Leatro Link)
- Facilitation Payments (Leatro Link)
- Speak Up Policy
- Fraud Policy
- GLP 026 – Anti-Bribery and Corruption Guideline

Our Code | Additional Guidance | Contacts

- Your business Ethics and Compliance team

Anti-Money Laundering Policy

Principles

- We will comply with all applicable Anti-Money Laundering laws and regulations. To maintain compliance this policy must be adhered to.
- We only conduct business with reputable customers who are involved in legitimate business activities and whose funds are derived from legitimate sources.
- We do not allow Cash Currency Payments from customers for the provision of any goods or services.
- We perform risk based due-diligence known as the Know Your Customer (KYC) process on potential customers and report suspicious activity as required.
- We conduct Group and Divisional level money laundering risk assessments to ensure the existing AML framework remains effective.

We

- ensure that new potential customers are subject to appropriate due diligence;
- report Suspicious Activity through the approved channel when we possess information or identify a Red Flag that causes suspicion about whether money or other assets have been obtained illegally or are being used for unlawful purposes;
- limit the ability to receive Third Party Payments for our goods and services. Where Third Party Payments are allowed, we ensure that we adequately identify the source of the funds being provided on behalf of our customer;
- complete AML training when required; and
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Anti-Money Laundering Policy

Leaders

In addition to the general expectations of leaders set out in the introduction to our Code and Group Policies, leaders:

- support their teams in maintaining our zero tolerance approach to money laundering.

Our Code | Additional Guidance | Contacts

Take a look back at our Code principles related to this policy:

- Anti-Bribery and Corruption section

Our Code | Additional Guidance | Contacts

- Suspicious Enquiries
- Red Flag guidance
- Speak Up Policy

Our Code | Additional Guidance | Contacts

- Your business Ethics and Compliance team

Competition and Antitrust Policy

Principles

- We ensure we comply with all applicable competition laws in the markets in which we operate.
- If we are unsure whether our proposed market conduct is appropriate, we seek advice before proceeding.

We

- do not agree with our competitors to avoid competing with each other (e.g., by fixing prices or colluding on competitive bids);
- seek legal advice on any other agreements which may have the effect of limiting competition;
- keep Competitively Sensitive Information confidential unless authorised to share by the legal team and with appropriate safeguards in place;
- seek advice if another party discloses Competitively Sensitive Information to us or suggests entering into arrangements that may be anti-competitive;
- ensure that we compete on the merits of our products and do not use unfair means of competition; and
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Leaders

Our general expectations of leaders in relation to Our Code and Group Policies are set out in the introduction.

Competition and Antitrust Policy

Our Code | Additional Guidance | Contacts

Take a look back at our Code principles related to this policy:

- Competition and Anti-trust section
- Respecting the Confidential information of others section

Our Code | Additional Guidance | Contacts

- Competition Law Guidance
- Competition law: cooperation and communications with competitors Guidance.
- Guidance on market intelligence and benchmarking exercises
- Leatro Competition Law training – course ID COURSE_GL 24147
- Confidential Information Guidance
- Living our Confidential Information Policy (Leatro link)
- Speak Up Policy

Our Code | Additional Guidance | Contacts

- Chief Counsel – Competition (emma.griffiths2@rolls-royce.com)
- Your General Counsel contacts for your area
- Your business Ethics and Compliance team.

Confidential Information Policy



Principles

- We are all responsible for protecting, storing and handling Company, personal, customer and business partner Confidential Information correctly.
- When creating business documents we apply the appropriate business markings to ensure confidentiality and protection from misuse.



We

- protect everyone's Confidential Information and do not use or share it other than as authorised;
- take steps to mitigate the risks (with support from Ethics and Compliance) if we receive Confidential Information and we are unsure if we should have it;
- follow applicable laws and regulations relevant to Confidential Information;
- apply the appropriate business markings to documents in accordance with the guidance below, as further detailed in our Business Classifications Guidance document; and
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Business Classification		
Strictly Private	Private	Non-Confidential
Information or material that is highly confidential to the Rolls-Royce business (or another party) which may only be made available to others by the Rolls-Royce Group data owner. This data requires control and needs access actively managed.	Information or material that is confidential to the Rolls-Royce business (or another party) for which the data owner has permitted circulation by other employees within the Rolls-Royce Group. This data requires control within Rolls-Royce.	Information approved explicity for external dissemination. This data will not be controlled once released.

Leaders

Our general expectations of leaders in relation to Our Code and Group Policies are set out in the introduction.

Confidential Information Policy

Our Code | Additional Guidance | Contacts

Take a look back at our Code principles related to this policy:

- Respecting the confidential information of others section
- Data Privacy section
- Safeguarding our resources section
- Competition and Anti-trust section

Our Code | Additional Guidance | Contacts

- Protection of Information – Business Markings Policy
- Confidential Information Guidance
- Living our Confidential Information Policy (Leatro Link)
- Data Privacy Policy
- IT Acceptable Use Policy
- Intellectual Property Policy
- Competition and Anti-Trust Policy
- Speak Up Policy
- GLP 026 – Anti-bribery and Corruption Guideline

Our Code | Additional Guidance | Contacts

- Your business Ethics and Compliance team (for general Confidential Information queries)
- Group Security and Resilience team
- Intellectual Property team
- Cyber Security team
- Chief Counsel – Competition (emma.griffiths2@rolls-royce.com)

Conflicts of Interest Policy



Principles

- A Conflict of Interest arises where any relationship (personal or professional) or situation may limit, or appear to limit, our ability to make fair and objective decisions or act in the best interests of Rolls-Royce.
- All employees are responsible for identifying and managing Conflicts of Interest on an on-going basis.
- Conflicts of Interest under this policy can be **actual** (i.e. Conflicts of Interest that has arisen), **perceived** (i.e. a situation that may give rise to the perception of a Conflict of Interest) or **potential** (i.e. a Conflict of Interest that may arise given a particular fact or circumstance).
- Employees will not supervise or influence the recruitment, promotion, reward or benefits of a family member, close friend or someone they are in a relationship with.



We

- Avoid wherever possible, any situations giving rise to a Conflict of Interest, particularly those involving:
    - family or other personal relationships with another Rolls-Royce worker or a business partner (e.g. with a customer or supplier);
    - external employment;
    - personal financial interests; and
    - roles and responsibilities at Rolls-Royce.
- When a Conflict of Interest arises, we:
    - immediately discuss it with our leader as soon as possible;
    - try to eliminate the Conflict of Interest or reduce the risks it poses with due consideration of the legitimate interests of employees; and
    - where necessary report it using the form found at:
        - www.rrconflictofinterestform.ethicspoint.com;
    - follow laws and rules relating to the employment of current or former Government Officials;
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Conflicts of Interest Policy

Leaders

In addition to the general expectations of leaders set out in the introduction to our Code and Group Policies, leaders:

- look for potential Conflicts of Interest in their teams;
- help their teams understand and manage their potential Conflicts of Interest; and
- review, annually, any Conflicts of Interest reported to them to ensure they continue to be managed properly.
- Liaise with HR or the Compliance team as appropriate depending on the nature of the Conflict of Interest.

Our Code | Additional Guidance | Contacts

Take a look back at our Code principles related to this policy:

- Conflicts of Interest section

Our Code | Additional Guidance | Contacts

- Guidance document - examples of potential Conflicts of Interest
- Conflicts of Interest (Leatro Link)
- Conflict of Interest Reporting Form - www.rrconflictofinterestform.ethicspoint.com
- Inside Information and Share Dealing Policy
- Speak Up Policy
- Defence – Organisational Conflicts of Interest
- GLP 026 – Global Anti-Bribery and Corruption Guideline

Our Code | Additional Guidance | Contacts

- Your People Partner
  - For any queries you might have.
- Your business Ethics and Compliance team
  - They will review all Conflict of Interest reports submitted. They will also provide a copy of the report to you and your leader
- Your Local Ethics Adviser
  - For general queries and advice

Data Privacy Policy



Principles

- We respect data protection rights and follow applicable data protection laws.
- Employees, customers, governments and partners can trust us that we process Personal Data according to high standards.
- Our principles and our policies, standards and guidelines establish a global framework which we rely on and which we aim to improve continuously.



We

- inform individuals how their Personal Data is processed;
- process Personal Data in line with data protection laws;
- process and store Personal Data only for as long as necessary;
- take appropriate steps to protect Personal Data according to our data protection and cyber security policies and procedures;
- ensure that providers of services working on behalf of Rolls-Royce are bound by data protection agreements and adhere to our data protection and cyber security standards;
- always check if restrictions apply when transferring data from one country to another;
- assess, particularly when using new technologies such as artificial intelligence, the nature, scope, context and purposes of the processing and the associated risks for the rights and freedoms of our employees, customers' employees and partners;
- have established procedures to enable each employee to exercise their right to access Personal Data, their right to information about the data we process, or any other individual rights available to them under applicable data protection law;
- ensure data breaches are reported and investigated;
- ensure that our staff receive regular training on their obligations regarding the protection of Personal Data; and
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Data Privacy Policy

Leaders

In addition to the general expectations of leaders set out in the introduction to our Code and Group Policies, leaders:

- Are responsible to make sure that our policies and standards are followed in their area of responsibility;
- report any breaches of Personal Data Processing promptly;
- Act as role models to protect Personal Data and ensure that your employees do so too; and
- If Leaders become aware of potential processing breach situations you act and find solutions together with our data privacy team.

Our Code | **Additional Guidance** | **Contacts**

Take a look back at our Code principles related to this policy:

- Data Privacy Section

Our Code | **Additional Guidance** | **Contacts**

- Rolls-Royce Group Data Protection Standard and additional Procedures and Guidelines can be found on Engine Room
- Speak Up Policy
- GLP 005 (Power Systems Data Protection Policy)

Our Code | **Additional Guidance** | **Contacts**

- Global Centre of Excellence for Data Privacy (data.privacy@rolls-royce.com).
- Additionally you can contact local data privacy contacts and Data Protection Support Officers in the regions. A list of contact is available at the Engine Room pages.

Dignity and Respect Policy

Principles

- We care about our people and believe in a culture where everyone can be at their best.
- We believe in a working environment where everyone is treated, and treats others, with dignity and respect and is free from discrimination and harassment.
- We are committed to building a culture of respect and appreciation, giving everyone the opportunity to be themselves and to realise their full potential.
- We do not tolerate bullying, harassment, or discrimination of any kind.
- We recognise that behaviour can still be considered as inappropriate, discriminatory, bullying or harassment regardless of whether or not it was intended to be offensive.

We

- treat each other with dignity and respect;
- take action and speak up when we experience or observe bullying, harassment or inappropriate behaviour of any kind by anyone; and
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Leaders

In addition to the general expectations of leaders set out in the introduction to our Code and Group Policies, leaders:

- cast the right shadow and be a role model for our values and behaviours;
- be accountable for and deal with any issue that is raised and in a timely way; and
- actively encourage informal dialogue and resolution where possible.

Dignity and Respect Policy

Our Code | Additional Guidance | Contacts

Take a look back at our Code principles related to this policy:

- Working together section

Our Code | Additional Guidance | Contacts

- Dignity and Respect Engine Room pages
- Treating everyone with dignity and respect (Leatro Link)
- Speak Up Policy
- GLP 027 Anti-discrimination Policy

Our Code | Additional Guidance | Contacts

- Your local HR representative

Fraud Policy

Principles

- We are committed to the prevention and detection of Fraud and will investigate any allegation of fraudulent activity. Fraud is a criminal offence, which we will not tolerate.

We

- assess the nature and extent of our exposure to potential external and internal risks of Fraud.
- carry out a scheduled Fraud risk assessment that is rigorous and documented.
- apply due diligence procedures, taking a proportionate and risk-based approach, to mitigate identified Fraud risks.
- ensure that our Fraud prevention policies and procedures are embedded and understood throughout the organisation, through internal and external communication and training.
- regularly monitor and review our Fraud prevention policies and procedures and make improvements where necessary.
- require all individuals, regardless of position, title, or tenure, to remain vigilant and report any suspicions of Fraud to their manager, a subject matter expert (e.g., Ethics and Compliance), the legal team, a Local Ethics Adviser (LEA) or the Speak Up Line.
- will investigate all allegations of Fraud, and will take appropriate disciplinary and legal action, up to and including dismissal, recovery of losses and forwarding information to the appropriate authorities for prosecution.
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Leaders

Our general expectations of leaders in relation to Our Code and Group Policies are set out in the introduction.

Fraud Policy

Take a look back at our Code principles related to this policy:

- Fraud Policy

- Ethics and Compliance team.
- Legal team.

Gifts and Hospitality Policy



Principles

- We only offer or accept Gifts and Hospitality (G&H) when it is appropriate to do so in the circumstances in which it is provided, ensuring we are doing the right thing.



We

- only submit a G&H report for gifts and events that are given to or received from external parties;
- obtain any required approvals in advance unless it is not possible to do so, in which case it must be requested as soon as possible and no more than 30 days after the G&H;
- follow the table below for the approval and reporting requirements for any G&H over £35;
- only accept/provide G&H if it is appropriate and legal to do so in the circumstances;
- must not provide G&H to a customer when Rolls-Royce is bidding for a contract, or accept G&H from a supplier when they are bidding for a contract, if those receiving the G&H can influence the contract decision (this does not apply to basic refreshments provided as a business courtesy);
- must ensure the most senior Rolls-Royce employee in attendance pays for any G&H;
- do not accept/provide G&H in cash or cash equivalents (such as vouchers, gift cards or credit notes);
- do not provide G&H if we know the recipient is not allowed to receive it;
- do not provide tickets to events unless a Rolls-Royce representative attends or accept such tickets if a representative of the party providing them is not attending;
- consult our Ethics and Compliance team before entering into any contract requiring us to provide G&H (such as travel and accommodation in connection with site visits);
- consult our Ethics and Compliance team before arranging customers visits; and
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Gifts and Hospitality Policy

Type of G&H	Financial value *	Approval	G&H Report Required?
G&H given to a Government Official or employee of a State-Owned Company	Light refreshments (tea, coffee, snacks, working lunch etc.) under £35 per person	No specific approvals	No
	£100 or less per person	Line Manager	Yes – see additional guidance
	Over £100 per person	Business President or Executive Team member ***	Yes – see additional guidance
G&H given to/received by personal connections (e.g., friends or family members) **	Light refreshments (tea, coffee, snacks, working lunch etc.) under £35 per person	No specific approvals	No
	£100 or less per person	Line Manager	Yes – see additional guidance
	Over £100 per person	Business President or Executive Team member ***	Yes – see additional guidance
All other G&H given or received	£100 or less per person	No specific approvals	No
	Over £100, but less than £200 per person	Line Manager	Yes – see additional guidance
	£200 or more per person	Business President or Executive team member ***	Yes – see additional guidance

The financial values apply to the G&H event as a whole, not each element of it (for example, a meal followed by a sporting event is one event, as is an airshow or distributor/supplier conference).

** The relevant Rolls-Royce/external party whom these individuals are connected to must attend the G&H event.

*** Business Presidents and Executive team members may delegate approvals to members of their first line, but this must be communicated to the relevant Business Head Office Ethics and Compliance team.

**** Business Ethics and Compliance team must be consulted before entering into any contract requiring us to provide G&H.

Gifts and Hospitality Policy

Leaders

In addition to the general expectations of leaders set out in the introduction to our Code and Group Policies, leaders:

- pay for any G&H provided by Rolls-Royce where they are the most senior Rolls-Royce employee in attendance.
- ensure their teams record all G&H given or received.
- ensure that any G&H they approve has been correctly claimed for.

Our Code | Additional Guidance | Contacts

Take a look back at our Code principles related to this policy:

- Anti-Bribery and Corruption section
- Fraud section

Our Code | Additional Guidance | Contacts

- Fraud Policy
- G&H Reporting Form (on Ethics and Compliance Engine Room pages)
- Guidance on how to use Concur to report G&H
- List of individuals in each business with delegated authority to approve G&H on behalf of Executive Team members
- Gifts and Hospitality Bitesize (Leatro Link)
- Speak Up Policy
- GLP 026 – Global Anti-Bribery and Corruption Guideline

Our Code | Additional Guidance | Contacts

- Your business Ethics and Compliance team (for day-to-day G&H support and queries)
- Corporate Ethics and Compliance team

Global Equal Employment Opportunity Policy

Principles

- We create a working environment where we all understand the value of and are committed to non-discrimination.
- We create fair and impartial teams and non-discriminatory workplaces where we can all be at our best.
- We believe that our individuality is our greatest strength, and all perspectives, experiences and backgrounds help us innovate and enable our high-performance culture.
- Who we are and how we behave matters; building a culture of respect and appreciation grounded in our behaviours will enable us to fulfil our potential.
- We apply these principles not only to the way we treat each other, but also to contractors, visitors, customers, suppliers and former employees.

We

- treat everyone with dignity and respect;
- make people decisions based on merit;
- ensure everyone feels valued and create non-discriminatory environments;
- appreciate the differing needs of our people and take reasonable steps to offer flexible working arrangements where feasible;
- do not tolerate bullying, harassment or unfair discrimination of any kind, by anyone;
- ensure a zero-tolerance approach to discrimination; and
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Global Equal Employment Opportunity Policy

Leaders

In addition to the general expectations of leaders set out in the introduction to our Code and Group Policies, leaders:

- live our leadership expectations;
- actively build a culture where everyone can be at their best, by demonstrating and promoting our behaviours;
- ensure everyone is treated equally and respectfully; and
- recruit and develop our people on merit.

Our Code | Additional Guidance | Contacts

Take a look back at our Code principles related to this policy:

- Working together section

Our Code | Additional Guidance | Contacts

- Belonging Engine Room page
- Global Recruitment Policy
- Dignity and Respect Policy
- Reward Engine Room pages
- Flexible Working Engine Room pages
- Local diversity, discrimination and equal opportunity policies
- Local disciplinary and grievance procedures
- Speak Up Policy

Our Code | Additional Guidance | Contacts

- Your local HR representative

Human Rights Policy

Principles

- We are committed to respecting all recognised human rights and, through reference to international standards, this policy sets out our commitment to respect the human rights of:
  - our employees and contract workers;
  - those employed by our suppliers; and
  - communities affected by our operations and supply chain operations.
- In our own activities and operations, we take responsibility for respecting human rights and for conducting our business safely and in an ethically, environmentally, and socially responsible manner. We integrate sustainability considerations into decision-making at all levels of our organisation.
- We expect our suppliers, contractors, joint ventures and other partners to respect human rights in their activities and operations, and to always adhere to high standards of ethically, environmentally and socially responsible behaviour.
- We respect collective representation and consultation processes and laws in the countries where we work and believe the decision on whether to join a trade union, or not, is an individual choice.

We

- act in a socially responsible manner, complying with all applicable laws and regulations in the countries where we operate;
- ensure that employment is freely chosen and refrain from any form of forced or involuntary labour or human trafficking;
- never use any form of child labour or practices that inhibit the development of children;
- only work with suppliers whose core values and commitment to ethical business conduct matches our own and require that their conduct always meets our standards including by signing up to our Global Supplier Code of Conduct;
- prevent or minimise negative impacts to the environment of our products and services;

Human Rights Policy

We

- are alert to the risks vulnerable people may face and seek to ensure that this group is free from discrimination and exploitation;
- recruit, develop, reward and promote people on the basis of merit and are committed to ensuring equality of opportunity and progression;
- recognise the skills and contributions of all our employees and pay fair and competitive wages and benefits;
- comply with national regulations on working time and, where possible, provide for a flexible working environment;
- respect the right of privacy for all our people, and manage data in line with applicable laws;
- always speak up if we suspect any potential breach of human rights; and
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Leaders

In addition to the general expectations of leaders set out in the introduction to our Code and Group Policies, leaders:

- engage with their people and elected employee representatives, where they exist, through consultative bodies and other formal and informal means in line with local best practice and legal frameworks;
- conduct risk assessments and due diligence, as part of our risk management system, to identify and review potential human rights risks with the aim of continually improving respect for human rights;
- comply with import and export laws, regulations and procedures that apply to our operations globally including monitoring all exports against global sanctions, denied parties lists and destination policies through our trade compliance programme;
- provide guidance and training for their people on human rights areas including health and safety, non-discrimination, data privacy, ethics and export controls; and
- engage with the Ethics and Compliance team in cases where there is a risk that our products and services may have an adverse impact on human rights.

Human Rights Policy

Our Code | Additional Guidance | Contacts

Take a look back our Code principles related to this policy:

- Health Safety and Environment section
- Our Life-saving rules section
- Working with our customers, suppliers, partners and communities section
- Working together section
- Data Privacy section
- Anti-bribery and corruption section
- Export control and import obligations section

Our Code | Additional Guidance | Contacts

- People Engine Room Pages
- Rolls-Royce Annual Report
- Our Modern Slavery Statement
- Our Code
- Speak Up Policy
- GLP 022 Human Rights Policy

Our Code | Additional Guidance | Contacts

- Ethics and Compliance
- Sanctions and Export Control team
- Your Local Ethics Adviser
- Sustainability team
- Data Privacy team
- Employee Hub or your local People Partner

Inside Information and Share Dealing Policy

Principles

- As a company listed on the London Stock Exchange, we comply with our obligations, including under the UK Market Abuse Regulation (MAR). This is so we avoid committing a share dealing or market abuse offence.

- Under MAR, it is an offence to:
    1. deal in Rolls-Royce shares while in possession of Inside Information or recommend to someone that they deal in shares based on Inside Information;
    2. share / disclose Inside Information, other than in accordance with MAR's procedures; and
    3. do anything which gives false or misleading signals regarding Rolls-Royce shares, including the price.

- The Disclosure Committee of Rolls-Royce Holdings plc determines whether Inside Information exists and when it should be made public.

We

- do not deal in Rolls-Royce shares without obtaining clearance to deal first, if we have been notified that this restriction applies to us;
- do not deal in Rolls-Royce shares in a Closed Period, if we have been notified that this restriction applies to us;
- if we have been notified that we are included on a Confidential Project List we:
    - do not disclose the confidential information to anyone else;
    - acknowledge the notification and our obligations; and
    - contact the project manager first if we think we need to share the confidential information with a colleague;
- complete annual training to ensure we understand our obligations under MAR, if we have been notified that this is required;
- do not deal in Rolls-Royce shares on a short-term* nature;
- do not trade in options or other financial instruments in respect of Rolls-Royce shares;
- Contact the Corporate Governance Director immediately if we think we have access to inside information but have not been advised that we are on an Insider List;
- if advised that we are on an Insider List, we:
    - do not deal in Rolls-Royce shares or make recommendations to others until we have been advised otherwise;
    - do not disclose the Inside Information to anyone else;
    - acknowledge our obligations and provide the required personal information immediately; and
    - contact the Corporate Governance Director first if we think we need to share the Inside Information with a colleague, recognising that failure to do so would be putting our colleagues at risk of committing a market abuse offence; and
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

* Short-term trading means the acquisition and disposal (or vice versa) of shares within a 12-month period. The short-term trading restriction excludes shares acquired through Rolls-Royce share plans.

Inside Information and Share Dealing Policy

Leaders

Our general expectations of leaders in relation to Our Code and Group Policies are set out in the introduction.

Take a look back at our Code principles related to this policy:

- Safeguarding our resources section
- Conflicts of interest section
- Respecting the confidential information of other section

- The Corporate Governance Zone on Engine Room including: Inside Information & Share Dealing
- Insidertrack sso: https://www.rolls-royceinsidertrack.com/
- Insidertrack u&p: https://www.rolls-royceinsidertrack.com/PortalLogOn?ReturnUrl=%2f
- Speak Up Policy

- Governance Team – governanceteam@rolls-royce.com
  - For any general queries or advice
- Corporate Governance Director - Matthew.Conacher@rolls-royce.com
  - For queries about Inside Information

Intellectual Property Policy



Principles

- We protect our inventions and our brand.
- We take care when sharing Intellectual Property.
- We get value from Intellectual Property.
- We respect other people's Intellectual Property.



We

- protect our inventions by:
  - sharing our inventions with Group Intellectual Property (IP), so they can consider patent protection; and
  - not disclosing our inventions outside Rolls-Royce until Group IP advises it is safe to do so.
- protect our brands by:
  - working with the Communications team and Group IP when developing new names and brands; and
  - checking with the Communications team and Group IP before giving others permission to use our brands.
- take care when sharing IP by:
  - carefully considering what (if any) IP needs to be shared;
  - including appropriate IP and confidentiality terms in all agreements; and
  - checking non-confidential external communications with the Marketing, Communications or Papers and Conferences team.
- get value from IP by:
  - understanding what IP is and how it can help or harm our plans; and
  - considering who else may have relevant IP and whether they are a potential customer, supplier, partner or competitor.
- respect other people's IP by:
  - only using, sharing or storing it when we are sure we have the right to do so - if in doubt, check with Commercial, Legal, an IP Control Lead (IPCL) or Group IP;
  - checking with Group IP if we have any concerns over other people's patents or trade marks; and
  - not making any written comments about our rights or concerns until we have taken advice from Legal or Group IP.
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Intellectual Property Policy

Leaders

Our general expectations of leaders in relation to Our Code and Group Policies are set out in the introduction.

Our Code | Additional Guidance | Contacts

Take a look back at our Code principles related to this policy:

- Respecting the confidential information of others section
- Protecting our brand and reputation section
- Safeguarding our resources section

Our Code | Additional Guidance | Contacts

- IP in the Rolls-Royce Management System
- Confidential Information Policy
- Data Privacy Policy
- Export Control and Sanctions Policy
- Inside Information and Share Dealing Policy
- IT Acceptable Use Policy
- Learning and guidance material, including links to Leatro content, is available on the IP Engine Room pages
- Speak Up Policy
- GLP 024 – Intellectual Property (IP)

Our Code | Additional Guidance | Contacts

- RRD - Volker Plogmann (Volker.Plogmann@Rolls-Royce.com)
- RRPS - Oliver Venus (Oliver.Venus@ps.rolls-royce.com)
- UK – Nick Roberts (nick.roberts@rolls-royce.com)
- US – Alicia Gentile (Alicia.gentile@Rolls-Royce.com)

IT Acceptable Use Policy

Principles

- Our Information Systems are fundamental to our business and process the vast majority of our important data. This data is extremely valuable and is constantly threatened by Cyber Attacks.
- We are committed to protecting our data and information and complying to any legal, regulatory or contractual requirements.
- We always act in an ethical manner when using Information Systems, which includes public platforms and social media.
- We follow the rules and processes that apply to our Information Systems and do not attempt to bypass any controls.

We

- do not connect personal devices to Rolls-Royce internal networks or use them to process/store sensitive or controlled information without authorisation;
- do not store personal data on Rolls-Royce systems unless that data is required as part of our role;
- do not use company identities, including branding or official representations, in any non-Rolls-Royce communications or on external social media platforms unless authorised to do so;
- only use those Information Systems and applications which we have been authorised to use as part of our role;
- do not change or attempt to change the configuration of any Company device issued to us or Information System or application to which we have access unless authorised to do so;
- use AI tools in accordance with the Rolls-Royce Group AI Policy;
- limit the use of any removable media only to those that are authorised to use and with a critical business need;
- are responsible for the data on our Information Systems and ensure that it is classified and handled in accordance with the rules and regulations that apply, particularly when travelling with IT equipment;
- help protect the Company by:
    - complying with the password standard and never divulging our password to others – unless required to do so by law;
    - ensuring devices are locked when not in use;
    - Ensuring access rights are role-based and subject to regular reviews;
    - accepting any software updates in a timely fashion;
    - being extremely careful about clicking on links or attachments in emails from unknown or unexpected senders;
    - looking after any IT device (including not leaving items unattended in our own vehicle or other vehicles at any time) and reporting any losses; and
    - not browsing, posting or otherwise interacting with websites that are likely to be deemed unacceptable even if they are not blocked;

IT Acceptable Use Policy

We

- monitor the Information Systems to the extent permitted or as required by law and as necessary and justifiable for business purposes;
- report policy breaches, security incidents and suspicious emails to the cyber security contacts listed; and
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Leaders

In addition to the general expectations of leaders set out in the introduction to our Code and Group Policies, leaders:

- make sure that IT equipment (laptops, removeable drives, phones, etc) is returned when a team member leaves; and
- ensure that their teams have access only to the systems and data they need to do their job.

Our Code | Additional Guidance | Contacts

Take a look back at our Code principles related to this policy:

- Safeguarding our resources section

Our Code | Additional Guidance | Contacts

- Our information policies and standards
- Group Security & Resilience policies
- Data Privacy Policy
- Speak Up Policy
- Cyber Security Awareness (Leatro Link)

IT Acceptable Use Policy

- Your leader
- Accountable Executive or Relationship Manager (supports requests for concessions/exceptions to this Policy)
- Rolls-Royce IT Security - local IT Security contacts will support requests for concessions/exceptions to this Policy, or email
- RRITSecurityCompliance@Rolls-Royce.com
- UK Security Operations Centre Email: UK-SOC@Rolls-Royce.com
- US Security Operations Centre Email: US-SOC@Rolls-Royce.com
- Rolls-Royce Power Systems Security Operations Centre Email: CyberDefenceCenter@ps.rolls-royce.com
- Rolls-Royce IT Security, APAC Email: ITSecurity-APAC@Rolls-Royce.com
- Rolls-Royce IT Security, AMER Email: ITSecurityRRNA@Rolls-Royce.com
- Rolls-Royce IT Security, EMEA Email: RRITSecurityCompliance@Rolls-Royce.com
- Rolls-Royce Submarines Email: UITSecurity@Rolls-Royce.com

Know Your Partner Policy

Principles

- We only work with Third Parties who will not expose us to unacceptable reputational, legal and compliance risks and require that their conduct meets our standards at all times as detailed in our Group Policies.

We

- carry out due diligence on Third Parties we work with as detailed in the Global Know Your Partner Procedures;
- are alert to Red Flags relating to Third Parties we work with and contact our business Ethics and Compliance team for help with any Red Flags that arise;
- contact the Ethics and Compliance team before signing any confirmations (e.g. to customers or governments) relating to agents, consultants, distributors or other intermediaries we work with; and
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Leaders

Our general expectations of leaders in relation to Our Code and Group Policies are set out in the introduction.

- Leaders must ensure their teams follow the Global Know Your Partner Procedures.

Our Code | Additional Guidance | Contacts

Take a look back at our Code principles related to this policy:

- Anti-Bribery and Corruption section
- Fraud section
- Working with customers, supplier, partners and communities section

Know Your Partner Policy

Our Code | Additional Guidance | Contacts

- Global Know Your Partner Procedures
- Know Your Partner Portal
- List of potential Red Flags relating to Partners we work with
- Know Your Partner (Leatro Link)
- Fraud Policy
- Speak Up Policy
- GLP 026 – Global Anti-Bribery and Corruption Guideline

Our Code | Additional Guidance | Contacts

- Your business Ethics and Compliance team (for day-to-day queries)
- Corporate Ethics and Compliance team (for support with the Know Your Partner Portal - compliance.operations@rolls-royce.com)

Political Activity and Trade Association Policy

Principles

- Rolls-Royce engages in Political activity - including Political advocacy - to communicate with political stakeholders. This includes the development of policies relevant to our business and our industry.
- In doing this, we will comply strictly and fully with all relevant legal standards and requirements.
- All employees, and anyone acting on behalf of Rolls-Royce, engaged in Political activity must act with honesty, integrity and transparency at all times and in line with Our Code and the ABC Policy.
- Rolls-Royce does not make Political donations.
- Rolls-Royce does not engage in activity that favours one Political party over another.
- Trade associations, Industry groups and Think tanks are a route by which Rolls-Royce may seek to influence policy. Before engaging with any third-party organisation, we must ensure they are compliant with all relevant Rolls-Royce Group Policies.

Political Activity and Trade Association Policy

We

- consult the Government Relations team when engaging in Political activity such as Political advocacy, including responding to consultations and policy submissions.
- take a neutral stance on all Political matters and viewpoints. We must ensure we are not represented by membership organisations who reflect biased views;
- use the Corporate Contributions Tool to log requests for all types of corporate memberships, so that the relevant due diligence can be performed, and approval granted. For memberships with a political relevance a Government Relations check is conducted by the Government Relations tea;
- follow local rules around contacting Political stakeholders during Election periods;
- obtain approval from our line manager before taking any time out of work to carry out Personal political activities and keep a record of that time off via the relevant HR process or systems. If you are unsure how to record this type of absence, please contact your HR Team for advice;
- inform the Government Relations Team and HR team of any proposed secondments either into or from the offices of Political stakeholders.
- do not engage with Think tanks that make direct contributions to registered political parties;.
- do not second colleagues into Political parties;
- recognize that certain Rolls-Royce employees in the Unites States have a right to organize Political Action Committees and we comply with all laws and regulations governing them. The Rolls-Royce Employee Political Action Committee is administered by the company and supported by voluntary employee contributions. Our PAC is nonpartisan and supports Democrat and Republican Members of Congress; and
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Leaders

Our general expectations of leaders in relation to Our Code and Group Policies are set out in the introduction.

Political Activity and Trade Association Policy

Our Code | Additional Guidance | Contacts

Take a look back at our Code principles related to this policy:

- Fraud section
- Political Activity and Trade Association section

Our Code | Additional Guidance | Contacts

- Government Relations Engine Room pages
- Political Activity and Trade Associations Standards
- Fraud Policy
- Speak Up Policy
- Corporate Contributions Tool

Our Code | Additional Guidance | Contacts

- Your local Government Relations team.

Sanctions and Export Control Policy



Principles

- We are committed to complying with strategic sanctions and export control laws, regulations and procedures of all countries where we operate.
- Non-compliance with these legal requirements is a principal risk for the Company and can result in reputational damage, financial penalties and loss of business.



We

- understand export control involves the physical transfer of goods, software and technology, the electronic transfer of technology and the provision of technical assistance and maintenance services for our products;
- consult with dedicated specialists to help manage sanctions and export control awareness and compliance;
- incorporate sanctions and export control requirements into other business procedures to ensure that compliance is integrated into the way we operate;
- Monitor suspicious enquiries from those attempting to obtain items on behalf of sanctioned parties;
- use online screening and compliance tools (as detailed further in our more detailed guidance documents); and
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Leaders

In addition to the general expectations of leaders set out in the introduction to our Code and Group Policies, leaders:

- involve their sanctions and export control specialists at all stages of business activity including strategy, product sourcing, contracting offset, "off-shoring", technology licensing and the delivery of hardware and its associated documentation, changes to IT infrastructure and IT tools, cloud computing strategies, R&D projects, M&A, and integration to ensure that the sanctions or export control implications of a decision are clearly understood from the outset; and
- ensure that their team utilise online screening and compliance tools correctly and to maximum effect.

Sanctions and Export Control Policy

Take a look back at our Code principles related to this policy:

- Export Control and import obligations section

- Export Control Principles in the Rolls-Royce Management System
- Export Control Engine Room pages provide further export control and sanctions:
- Policies
- Procedures
- Guidance documents
- Suspicious enquiries
- Audits and Handling Suspected Non-Compliance
- Tools and Forms
- Training and Awareness
- Export Control (Leatro Link)
- Speak Up Policy
- GLP 020 – Strategic Export Controls

- Global Export Control team
- Export Points of Contact (EPoC) - find them in the contacts section in Workday

Security and Resilience Policy

Principles

- We value the security and resilience of our people, assets, Intellectual Property and Confidential Information.
- Developing and maintaining a secure and resilient company makes business sense and our greatest asset in achieving this is our people.

We

- act in a responsible manner conducive to the safety and security of ourselves, colleagues, contractors, visitors, information, assets and facilities;
- support compliance of our facilities to Security and Resilience Procedures and Guidance Notes and comply with instructions of Security Personnel;
- wear our corporate identification pass at all times whilst on Company premises and are willing to make it available for inspection by Security Personnel;
- report as soon as possible, using the appropriate channels, any matters likely to jeopardise the safety, resilience and security of our employees, contractors and visitors, or lead to the potential loss of Rolls-Royce assets or information;
-
- comply with the terms of the Business Travel Security Procedure when planning business travel; and
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Leaders

In addition to the general expectations of leaders set out in the introduction to our Code and Group Policies, leaders:

- ensure that their teams are aware of, and their facilities are compliant to, the Security and Resilience Procedures and Guidance Notes;
- ensure any reported non-compliance to the Security and Resilience Procedures within their teams or facilities is dealt with in an appropriate and timely manner; and
- ensure that their teams gain the necessary approvals if undertaking any deployment, posting or business travel to a higher risk location.

Security and Resilience Policy

Our Code | Additional Guidance | Contacts

Take a look back at our Code principles related to this policy:

- Safeguarding our resources section

Our Code | Additional Guidance | Contacts

- Employment and Assignment Screening Policy
- Facility Protective Security Policy (Black Book)
- The Risk Engineering Design and Management Policy (RED Book)
- Group Crisis and Incident Management Policy
- Protection of Information – Business Markings Policy
- International Business Travel Security Procedure
- IT Acceptable Use Policy
- Global Insider Threat Policy
- Confidential Information Policy
- Health, Safety and Environment Policy
- Global Travel Policy
- Speak Up Policy
- GLP 047 – Security and Resilience

Our Code | Additional Guidance | Contacts

- Security and Resilience Business Lead – Business
- Security and Resilience Point of Contact – Local
- Group Security and Resilience Team – Group Level

Sponsorships and Donations Policy

Principles

- Sponsorships and Donations must only be given when there is a clear, legitimate benefit to Rolls-Royce and/or the communities it operates in, either for commercial or charitable purposes.
- Sponsorship and Donations must be made in compliance with the Rolls-Royce Anti-Bribery and Corruption Policy and follow the Sponsorships and Donations Standards (see additional guidance).
- Sponsorship and Donations must only be used for purposes articulated in this Policy.
- We prohibit Sponsorship or Donations linked to political parties.
- Responses to emergency situations must be approved by the Group Charitable Contributions and Social Sponsorship Committee.
- We follow any laws in the countries we operate in which require us to support local communities.

We

- only make charitable donations and social sponsorships which support one or more of the following four areas:
    - Education and skills
        - with a focus on Science, Technology, Engineering and Mathematics ("STEM") which are key to our future success.
    - Environment
        - adding a social dimension to our purpose to deliver clean, sustainable power for the world's most vital needs.
    - Social investment
        - making a positive difference in the communities where we operate.
    - Arts, culture and heritage
        - contributing to cultural vibrancy in the places where we are based.

- only provide donations in emergency situations (such as humanitarian crises) following approval from Group Charitable Contributions and Social Sponsorship Committee.
- only provide commercial sponsorship where there is a clear and overriding objective to strengthen the relationship with our customers or other external stakeholders and further enhance our reputation.
- always follow the Sponsorship and Donations Standards when making a sponsorship or donation.

- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Sponsorships and Donations Policy

Leaders

Our general expectations of leaders in relation to Our Code and Group Policies are set out in the introduction.

Our Code | Additional Guidance | Contacts

Take a look back at our Code principles related to this policy:

- Fraud section
- Working with our customers, suppliers, partners and communities section

Our Code | Additional Guidance | Contacts

- Sponsorships & Donations Standards
- Corporate Contributions Tool
- Conflicts of Interest Policy
- Fraud Policy
- Gifts and Hospitality Policy
- Know Your Partner Policy and Procedures
- Speak Up Policy
- GLP 025 – Charitable Contributions and Social Sponsorships (Rolls-Royce Power Systems)
- Charitable contributions – governance & accountabilities
- Charitable contributions – criteria & guidance central funding
- Charitable contributions – impact matrix
- Guidance – Emergency Response

Our Code | Additional Guidance | Contacts

- Your leader
- Your business Ethics and Compliance team
- Your local community investment contact
- The global Community Investment team
- Community Investment Manager and Policy Specialist (Gill Fennell) for any enquiries relating to the Group Charitable Contributions and Sponsorships Committee
- Community Investment Manager and Reporting Specialist
- Group Charitable Contributions and Social Sponsorships Committee, when it is necessary to seek enhanced approval

Procurement Policy

Principles

- We all have a responsibility to ensure external expenditure represents best value for Rolls-Royce and our customers and that all activities comply to the regulatory framework within which we operate.
- Suppliers will be selected on the basis that they represent best value and meet all regulatory, ethical and sustainability standards. All procurement activities shall be transacted with absolute integrity and to the highest ethical standards.
- Any procurement activity will be conducted in compliance with the applicable procurement process and our Code.
- All customer specific contractual requirements will be adhered to and, where appropriate, flowed down throughout the supply chain.
- Supplier selection is conducted by a transparent and fair process and considers the use of small suppliers.
- Supplier relationships are built upon trust.

We

- only do business with suppliers who have the necessary capability, demonstrate high levels of performance and meet our ethical and sustainability standards, as defined in the Global Supplier Code of Conduct and Sustainable Procurement Policy;
- operate within the boundaries defined in our Group Decision Rights, which includes the requirement that the appropriate procurement group must be engaged prior to initial contact with suppliers;
- only use purchase documents (such as purchase orders and schedule agreements) as the mechanism to instruct suppliers to perform work; and
- read the introduction to our Code and Group Policies to understand who they apply to and the consequences for breaching them.

Leaders

Our general expectations of leaders in relation to Our Code and Group Policies are set out in the introduction.

Procurement Policy

Our Code | Additional Guidance | Contacts

Take a look back at our Code principles related to this policy:

- Working with customers, suppliers, partners and communities

Our Code | Additional Guidance | Contacts

- Procurement Engine Room pages (for key contacts)
- Rolls-Royce Management System
- Global Supplier Code of Conduct
- Group Decision Rights
- Supplier Payment Policy
- Indirect Procurement Coupa ‘how to’ guides
- Sustainable Procurement Policy
- Cost Conscious Decisions (Leatro Link)
- Speak Up Policy
- Working Capital Group Policy
- GLP 001 – General Purchasing Guidelines

Our Code | Additional Guidance | Contacts

- Group Procurement Organisational Structure

Glossary

- **Anti-Money Laundering or AML:** laws and regulations in place to prevent Money Laundering.
- **Bribe:** Anything of value given, offered, requested or received in order to improperly influence or reward any act, inaction or decision.
- **Cash Currency Payments:** Payments received from customers for the provision of goods and services that are in the form of physical cash i.e., bank notes/paper money or coins.
- **Charitable Contributions:** Support for good causes, which can include one-off financial contributions, employee time, or Gifts-in-Kind. Charitable contributions are aligned to business rationale, generate goodwill for our company and are usually socially motivated.
- **Closed Period:** A period of at least 30 calendar days prior to the release of the Company's half-year and full-year results.
- **Competitively Sensitive Information:** Refers to non-public strategic information which is relevant to a company's conduct on the market. For example: current or future prices (including margins, discounts etc.); input costs; sales volumes; production capacity; R&D or future technology plans; investment plans; marketing strategies. Information is generally not competitively sensitive if it is (i) public; (ii) historical; or (iii) aggregated and anonymised so that it cannot be attributed to an individual company.
- **Confidential Information:** Company, personal, customer and business partner information, in any form, that is not in the public domain and is intended to be protected from disclosure. The information may be confidential whether or not it is labelled "confidential" or "proprietary" and whether it is oral, written, drawn or stored electronically. Labelling information "confidential" or "proprietary" or other classification does not automatically make the information Confidential Information.
- **Confidential Project List:** A project which is not currently considered Inside Information but has the potential to become so at a future date.
- **Conflict of Interest:** Any relationship (personal or professional) or situation that may limit, or appear to limit, our ability to make fair and objective decisions or act in the best interests of Rolls-Royce.
- **Cyber Attack:** An attempt to gain unauthorised access to system services, resources, or information for the purpose of disrupting, disabling, destroying, or maliciously controlling a computing environment/infrastructure, or destroying the integrity of the data or stealing controlled information.
- **Defence-in-Depth:** A multi-tiered control strategy which layers different security approaches/controls such that even if one control fails, or a vulnerability is exploited, a Cyber Attack should still not succeed. This can consider different technologies and components, and appropriate blends of physical and logical/digital security controls, and of people-, process-, policy- and technology-based controls.
- **Election Period:** The time when an election campaign formally begins and when election campaign spending rules may be activated.

Glossary

- **Facilitation Payment:** A payment made to a Government Official in exchange for them taking (or speeding up) decisions or actions. The payment of a fee to fast track a service in accordance with an official and published price list is not a Facilitation Payment.

- **Fraud**: Any intentional act or omission designed to (i) deceive others and (ii) result in the victim suffering a loss and/or the perpetrator achieving a gain.

- **Gifts:** Items of value given to or received from a party outside Rolls-Royce, including Gifts-in-Kind.

- **Gifts-in-Kind:** Gifts of products, equipment or services which usually have little cost to the Company but a greater value to the beneficiary. Examples include products donated to colleges or museums, meeting rooms or venue space given to charity or community partners, and printing done for not-for-profit organisations.

- **Government Official:** Any: employee of a State-Owned Company ; Officer or employee, or anyone acting on their behalf, of any department, agency, or instrument of a government (at any level). This includes (but is not limited to) employees and members of the military, paramilitary, security services, police force, customs, border patrol, legislatures, and judicial system of any country; elected political representative; political party and any officer, employee or other person acting on behalf of a political party; candidate for public office; member of a ruling or royal family; officer of any body, whether public or private, that has delegated powers to administer public funds; officer or employee of a public international organisation (for example, the United Nations and the World Bank); special adviser to governments, or individual government officials, whether paid or unpaid, formal, or informal; and family member of any of the above.

- **Hospitality:** Any food, drink, travel, accommodation or entertainment given to or received from a party outside Rolls-Royce. Free attendance at a training event is not considered Hospitality, but any free travel and accommodation to attend that conference is considered Hospitality.

- **Information Systems:** All computer operations within Rolls-Royce, including, but not limited to, mainframes, midranges, minis, local- and wide-area networks, personal desktop and laptop computers, smart phones, tablets, telecommunications, any new technologies currently under development, and any other specialised computing or storage devices residing in functional areas where data is transmitted or processed via electronic, telecommunications, satellite, microwave, wireless or, any other media.

- **Inside Information:** Information of a precise nature that: a) has not been made public; b) relates, directly or indirectly, to Rolls-Royce; and c) if it were made public, would be likely to have a significant effect of the Rolls-Royce share price (that is, information that a reasonable investor would be likely to use as part of the basis of their investment decisions).

- **Insider List:** Any list of individuals with access to Inside Information (i.e. a price sensitive project). An Insider List will only be created in the event that Inside Information exists. Individuals on an Insider List will be subject to a share dealing prohibition.

- **Know Your Customer (KYC):** Anti-money laundering and sanction evasion policies and procedures such as due diligence used to determine the true identity of a customer and the type of activity that is “normal and expected”, and to detect activity that is “unusual” for a particular customer.

- **Money Laundering:** The process of concealing or disguising the existence, source, movement, destination or illegal application of illicitly-derived property or funds to make them appear legitimate. The legal definition of money laundering can differ from country to country.

Glossary

- **Personal Data:** Any information which identifies individuals, whether held in electronic or hard copy format.
- **Personal Political Activity:** An activity which requires and employee to come into contact with the political community or deal with political matters in a personal capacity rather than in a capacity representing Rolls-Royce, other than voting in elections or activity during annual leave, holiday or other approved personal time off.
- **Political Action Committees PAC:** Employee-run entity supported by voluntary employee contributions in support of US Members of Congress who support policies that positively impact our industry.
- **Political activity:** Any activity which requires an employee to interact or work with the Political Community, or deal with political matters in connection with Rolls-Royce business.
- **Political advocacy:** Activity intended to influence the actions, policies or decisions of governments and policy makers.
- **Political advocate:** A political advocate is someone (in-house or external third party) who represents the company to political stakeholders to inform, influence or create an effect in the company's interest.
- **Political Community:** Any of the following:
  - **Political stakeholders**: national/federal ministers and officials; elected representatives including at regional and local level; diplomats (e.g., Ambassador or High Commissioner), and any candidate for public office;
  - **Political party**: organisations with the objective of acquiring and exercising political power;
  - **Trade association or industry group**: also known as industry trade group, business association, sector association or industry body, that is made up of a collection of companies and/or individuals with common interests or who work in the same industry;
  - **Think Tank**: think tanks being a group of experts working together to develop policy ideas and research to influence global, regional and national political policy. They can be focused on one sector or topic, or a broader area of policy.
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- **Political Donation:** A payment or transfer of value (which includes time) made to a political party, political organisation, any representatives of such parties, or individuals standing for public office.
- **Political Support:** Any activity which requires an employee to come into contact with the political community or deal with political matters in connection with Rolls-Royce business.

Glossary

- **Processing:** Any activity involving personal data such as collection, use, manipulation, recording, storage, retrieval, adaptation, alteration, disclosure by transmission or otherwise, dissemination, destruction or erasure.

- **Red Flags:** A warning signal that should bring attention to a potentially suspicious situation, transaction or activity. See the Red Flag guidance for further details on the types of red flag.

- **Secure-by-Design:** Security issues are considered as part of the basic architectural design of a product or system. System architectures and detailed designs are reviewed for possible security issues; mitigations for all threats are designed-in from early the stages. This process is iterative and continues throughout development. To enable this, security thinking and security engineering activities are embedded throughout the engineering lifecycle, as a core component of the engineering process.

- **Security Personnel:** Members of the Rolls-Royce Group Security and Resilience Team and uniformed guard officers contracted by the Company to provide security at Rolls-Royce facilities.

- **Social Sponsorships:** Commitments aligned to our business objectives and which enhance our brand and reputation. Sponsorships generally involve a defined benefit such as promotion of our brand, image, products or other agreed benefits. Social sponsorships can be either socially or commercially motivated, as long as they have a social dimension.

- **State-Owned Company:** A company that one or more government or government body owns or controls 50% or more of.

- **Suspicious Activity:** Irregular or questionable customer behaviour or activity that may be related to a Money Laundering or other criminal offence such as sanctions evasion, or to the financing of a terrorist activity. May also refer to a transaction that is inconsistent with a customer's known legitimate business, personal activities or the normal level of activity for that kind of business account.

- **System Security Architect:** An engineer who addresses "big-picture" security viewpoints for a programme or product system, i.e. determines design space and security boundaries and identifies trade-offs for different approaches. The role involves developing system concepts, working on the capabilities phases of the system's development lifecycle, and translating technology and environmental conditions (e.g. law and regulation) into system and security designs and processes.

- **System Security Engineer:** An individual who performs any or all of the activities defined by the systems security engineering process, regardless of their formal title. Additionally, this term refers to multiple individuals operating on the same team or cooperating teams.

- **Third Party:** Any entity or individual other than Rolls-Royce, its wholly-owned subsidiaries and Joint Ventures.

- **Third Party Payment:** A customer payment where the source of the funds being provided are by a separate individual or entity (a third party).

