



Supplier Code of Conduct

Introduction

The execution of our strategy is firmly anchored by our culture – the foundation comprised of uncompromising shared values and spirit. Our values are the HEART of NASCAR – Authentic, Courageous, Driven, Inclusive, Innovative and Stewarding.

We recognize we are a part of something greater than ourselves and that we are caretakers of a community of trust. NASCAR thrives upon our commitment, and we foster a culture that unlocks the full potential for success as a company, and as individual and team contributors.

NASCAR's Supplier Code of Conduct ("Code") defines our strict expectations of how NASCAR's Suppliers should operate. Suppliers, their workers, agents, and subcontractors (collectively referred to as "Suppliers") are expected to adhere to this Code while conducting business with or on behalf of NASCAR. This includes aligning and integrating guidelines, policies, and practices with this Code and communicating and enforcing the Code throughout their organization and across their supply chain. This Code should be prominently communicated in a language and method that is accessible and understandable.

All Suppliers must act with integrity and are expected to demonstrate a commitment to legal, ethical, safe, fair, and responsible business practices. NASCAR promotes an inclusive and diverse work environment and expects its Suppliers to demonstrate a similar commitment to inclusive business practices.

While we recognize that there are different legal and cultural environments in which our Suppliers operate, all Suppliers are required to comply with all relevant laws, rules, regulations, and standards in the countries in which they operate and meet the minimum expectations set forth in this Code. We encourage our Suppliers to go beyond legal compliance and business ethics, aspiring to meet internationally recognized standards to advance social and environmental responsibility. In instances where standards outlined in this Code differ from local laws, Suppliers must adhere to the more stringent standards. Any reference to "NASCAR" in this Code shall be deemed to include all NASCAR affiliates and subsidiaries with which a Supplier may be doing business.

This Code consists of six sections, including standards on human rights, labor rights, and environmental and anti-corruption principles.

- Section 1: Human Rights and Labor Practices
- Section 2: Health and Safety
- Section 3: Inclusion and Diversity
- Section 4: Environmental Sustainability
- Section 5: Business Ethics and Regulatory Compliance
- Section 6: Management Systems

1. Human Rights and Labor Practices

We are committed to conducting business with honesty and integrity, and in full compliance with all applicable laws. Respecting human rights means treating people with dignity. NASCAR recognizes its responsibility to respect internationally recognized human rights and labor standards, including the Universal Declaration of Human Rights, United Nations Guiding Principles on Business and Human Rights, and the International Labor Organization's Core Conventions. We expect our Suppliers to enact similar policies and practices covering the following topics that apply to their workers and business relationships, including contract workers:

a. Freely Chosen Employment

Suppliers must not engage in or support any form of slavery, forced or compulsory, bonded, prison, indentured labor, or human trafficking of involuntary labor through threat, force, fraudulent claims, or coercion. We require our Suppliers to fully comply with the obligations of applicable slavery, forced labor, and human trafficking laws, including, but not limited to, the UK Modern Slavery Act and the Australian Modern Slavery Act.

Suppliers are expected to implement rigorous due diligence measures to ensure that no human trafficking exists within their extended supply chains.

b. Child Labor

We condemn all forms of child exploitation. Suppliers must not employ or recruit child labor and support the elimination of exploitative child labor. Suppliers must not employ or support the employment of child labor in the manufacturing or in the provision of services or supply of goods. The term "child" refers to any person under the minimum age for employment in the country. Workers under the age of 18 years, however, must not be permitted to perform work that would be likely to jeopardize their health, safety, growth, or development.

Suppliers are expected to take all necessary and rigorous preventive measures to ensure that they do not employ anyone under the applicable legal minimum age of employment.

c. Wages and Benefits

Suppliers must ensure that their workers are paid lawful wages, including overtime, premium pay, equal pay for work, and legally mandated benefits.

d. Working Hours

Suppliers must ensure that working hours do not exceed the maximum set by local law.

e. Freedom of Association and Collective Bargaining

In addition to all local laws and regulations governing the legal rights of their employees, Suppliers are expected to respect the rights of workers to join or not to join worker organizations including trade unions.

f. Harassment, Discrimination, and Equal Employment Opportunity

Suppliers are expected to ensure that all people, without regard to race, color, gender, gender identity and expression, age, national origin, disability, religion, sexual orientation, genetic information, pregnancy, or veteran status are provided with equal employment opportunities and are not harassed or discriminated against in any way.

All forms of violence and harassment, including physical, sexual, verbal, and psychological abuse, are prohibited. Suppliers are expected to diligently ensure that all workers are protected from retaliation for raising concerns related to violence and harassment. No hardship, loss, benefit or penalty should be imposed on a supplier's employee for bringing a good faith report of harassment to the Company's attention or for cooperating in an investigation.

2. Health and Safety

NASCAR recognizes the importance of conditions that are healthy and safe for all workers and expects its Suppliers to provide a working environment that minimizes health and safety risks, supports accident prevention and emergency plans and response procedures, and protects the health and safety of all people who may be affected by their activities. Our Suppliers must comply with all applicable health and safety laws and regulations in the territories in which they operate. In addition, our Suppliers are expected to adhere to the following:

a. Occupational Safety

Suppliers are expected to proactively identify, assess, and control as appropriate any possibility of workers being exposed to potential safety hazards (i.e., machinery, chemical, electrical and other energy sources, fire, vehicles, and fall hazards) and physically demanding work.

b. Drugs and Alcohol

Our Suppliers must expressly prohibit the use, manufacture, distribution, sale, or possession of narcotics, drugs, controlled substances, paraphernalia, and literature that promotes illegal drugs and substance use while on NASCAR-owned or NASCAR- managed premises.

To ensure a safe and healthy working environment for all workers, Suppliers are expected (including those permitted by state or local law) or that otherwise adversely affects their employees' job performance or is within eight hours of an employee reporting for work, training, or other opportunities while engaging in work for or representing NASCAR.

3. Inclusion and Diversity

Respect is the foundation of an inclusive work environment and is key to NASCAR's success. We expect our Suppliers to promote an inclusive work environment actively and meaningfully in their operations and across their supply chains.

Suppliers are encouraged to engage in supplier diversity by procuring goods and services from companies that are majority owned, operated and controlled by the following economically disadvantaged groups: Minority-owned, Woman-owned, LGBT-owned, Veteran, Disabled Veteran and Disabled-owned businesses.

4. Environmental Sustainability

We place a high value on protecting the environment and communities in which we live and operate. We ask our suppliers to share our commitment to reduce the environmental impacts associated with our operations and supply chain.

We expect our suppliers to comply with all applicable environmental laws and regulations in the territories in which they operate which may pertain to hazardous waste storage, pollutant discharge, disposal of construction materials, banned consumer goods, or other local regulations. We also encourage our suppliers to reduce carbon or energy emissions where possible, ensure the responsible use of energy and water, minimize and manage waste.

5. Business Ethics and Regulatory Compliance

NASCAR conducts its business in accordance with the highest ethical standards and in compliance with all applicable laws, rules, and regulations. Our Suppliers must conduct business fairly, ethically, and in compliance with the laws, rules, and regulations in the geographic regions in which they operate. Our Suppliers are expected to have in place comprehensive policies and processes as appropriate to ensure that all employees understand and adhere to these standards.

a. Anti-Bribery

Suppliers must have a zero-tolerance policy for corruption and bribery in any form. Our Suppliers are required to strictly comply with the obligations of all applicable anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. In addition, our Business Partners must not directly or indirectly give, offer, or accept anything of value to obtain or retain business or favored treatment, to influence actions, or to obtain an improper advantage for NASCAR, itself, or a third party. This includes, but is not limited to, any benefit, fee, commission, dividend, cash, gratuity, services, consideration, or inducements of any kind to any NASCAR employee. We expect our Suppliers to require the same of their affiliates, retained agents, subcontractors, intermediaries, or workers.

b. Antitrust

Suppliers must adhere to all applicable antitrust and fair competition laws in the territories in which they operate. This includes not participating in any of the following: price fixing, volume/capacity agreements among Suppliers, collusive bidding, market/customer allocation, illegal price discrimination in products, tie-ins, attempts to monopolize any market, reciprocal dealing requirements, and theft or trade secrets.

c. Conflicts of Interest

Suppliers must avoid the appearance of or actual improprieties or conflicts of interest in accordance with NASCAR's Conflicts of Interest Policy. NASCAR's Suppliers must disclose promptly all information regarding financial and personal relationships, arrangements with NASCAR employees, representatives, or their close relatives that could appear to influence the negotiation process or the outcome of an agreement, or potentially create a conflict of interest. To disclose conflict of interest please email supplierintegrity@nascar.com.

d. Insider Trading

Suppliers must not buy or sell any company's securities when in possession of "material, non-public information" about NASCAR or another company that could influence an investor's decision to buy or sell the security.

e. Press and Authority

Suppliers are prohibited from speaking to the press or any others on behalf of NASCAR without written express authorization from NASCAR. Suppliers are also prohibited from using or implying any affiliation or endorsement with NASCAR in promoting their business, products, or services unless expressly permitted in writing by NASCAR. Suppliers have no authority to bind or otherwise commit NASCAR unless expressly permitted by their contract.

f. Business Records

Suppliers are expected to honestly and accurately record and report all business information and dealings as well as comply with all applicable laws regarding their reporting, completion, and accuracy. Our Suppliers are required to create, retain, and dispose of business records in full compliance with all applicable legal and regulatory requirements in the territories in which they operate. The falsification of records and/or misrepresentation of conditions or practices in the supply chain is unacceptable.

g. Company Complaint Mechanism

Suppliers are expected to have a transparent and accessible process through which employees can raise workplace or other concerns without fear of retaliation. This complaint mechanism should be understandable to all employees and recognize the sensitivities associated with lodging a concern, taking into special consideration race, color, gender, gender identity and expression, age, national origin, disability, religion, sexual orientation, genetic information, pregnancy, and veteran status.

h. Gifts

Suppliers are permitted to offer NASCAR employees business gifts or hospitalities if the gift or hospitality is appropriate and customary in size, cost, frequency, and nature so as not to influence an action by a NASCAR employee. NASCAR's Conflict of Interest Policy contains guidelines of acceptable and unacceptable gifts as well as important information about the disclosure of conflicts of interest, including, without limitation, a prohibition on giving or accepting gifts offered during an active RFP, contract renewal, or contract negotiations as well as the requirement that any individual gifts more than \$150 (US Dollars), or multiple gifts over the course of a single calendar year amounting to more than \$500 (US Dollars) be disclosed and approved prior to giving. To disclose gifts, please email supplierintegrity@nascar.com.

i. Intellectual Property

Suppliers must protect NASCAR's intellectual property, including, without limitation, trademarks, patents, copyrights, business methodologies, and trade secrets. Suppliers may not use any NASCAR intellectual property or confidential information except as provided in the Supplier's contract.

j. Privacy and Data Protection

Suppliers are expected to have effective and technologically sufficient privacy and security programs in place to ensure the protection of personal information of everyone with whom they conduct business, including Suppliers, Employees, Customers, and Consumers. Suppliers must also comply with all privacy and security laws and regulatory requirements regarding the collection, storage, process, and transmission of personal information, including, without limitation, the EU and European Economic Area General Data Protection Regulation as well as the United States' Gramm-Leach Bliley Act and Children's Online Privacy Protection Act.

k. Responsible Sourcing of Minerals

Suppliers that supply products that include minerals sourced from conflict-affected and high-risk areas, including but not limited to cobalt, tantalum, tin, tungsten, or gold, are expected to strictly ensure that the sourcing of these minerals does not directly or indirectly finance or benefit armed groups or contribute to serious human rights abuses in Conflict-Affected and High-Risk Areas, as defined in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Our Suppliers are expected to exercise rigorous due diligence on the source and chain of custody of these minerals.

I. Noncompliance with Code

Suppliers are expected to promptly report to the NASCAR Business Integrity Hotline any actual or suspected violations of this Code, NASCAR's policies and procedures, and/or federal, state, or local law. If a Supplier is or may be in violation of this Code, the Supplier must inform NASCAR immediately and remedy any violation in a timely manner. NASCAR reserves the right to immediately terminate any agreements with a Supplier if such Supplier or its subcontractor(s) behaves in a manner that is or may be perceived to be unlawful or inconsistent with this Code.

m. Reporting

NASCAR maintains a few channels for Suppliers to raise concerns related to this Code without reprisal:

For guidance on this Code of Conduct and questions concerning laws and acceptable business practices, email supplierintegrity@nascar.com To report concerns and potential or actual violations of this Code, contact our NASCAR Supplier Integrity Hotline at 1-386-681-6707. NASCAR will periodically review and may unilaterally amend this Code from time to time to ensure that it continues to reflect the most important environmental, social, and governance issues that affect NASCAR, its Suppliers, and society.