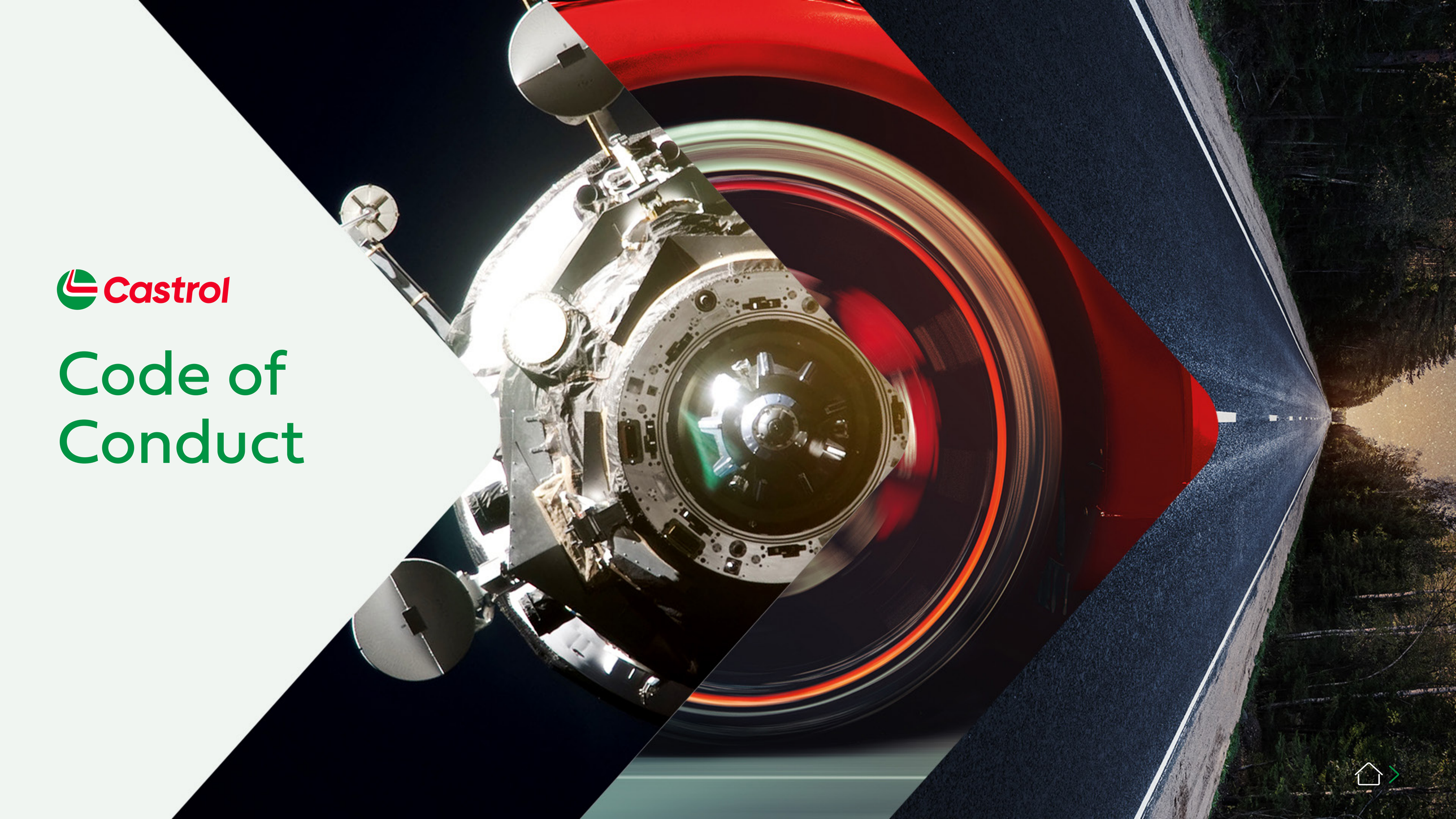
Castrol

Code of Conduct



A message from our CEO

At Castrol, how we deliver results is just as important as the results we achieve. Our Code of Conduct sets the foundation for the culture we are building together, one grounded in integrity, respect, accountability, and care for one another.

This Code applies to every one of us, regardless of role, seniority, or location. While it cannot cover every situation you may encounter, it provides the principles and guidance to help you make the right decisions, every day. It also explains where to go for advice and support when you are unsure.

We each have a responsibility to uphold our values and protect the trust that our colleagues, customers, partners, and communities place in us. That means speaking up when something does not seem right, asking questions when we need guidance, and acting with courage and integrity, even when faced with difficult choices.

Our standard is simple:
Do the right thing, every time.

If you are unsure, stop and ask. We have a range of 'Speak Up' channels available to support you. Speaking up protects our people, our business, and the culture we are building together.



Michelle

Michelle Jou, Chief Executive Officer, Castrol

Contents

Living our Code

How to use this Code 5
Who must follow this Code 5
Responsibilities for managers and leaders 5
Speak up 6

Our people

Safety and wellbeing 8
Respect in the workplace 9
Inclusion 9

Acting with integrity

Conflicts of interest 11
Gifts, entertainment and hospitality 11
Anti-bribery and corruption 11
Anti-money laundering and financial crime 12
Sanctions and trade controls 12
Fair competition 12

Protecting you, our business and the planet

Data protection and privacy 14
Records and financial integrity 14
Protecting Castrol's assets and information 14
Human rights and modern slavery 15
Sustainability and environment 16

Representing Castrol

Public communications 18
Political activity 19
Digital ethics and technology 19
Third parties, contracted staff and vendors 20

Guidance and responsibility

Consequences of non-compliance 22
Acknowledgements 22
Where to get help 23



Living our Code



How to use this Code

This Code is a statement of Castrol's standards and expectations. It is your guide to acting with integrity. It sets out our expectations and gives you the principles to make the right decision. It does not replace your judgement – it supports it.

When facing a decision, ask yourself:

- Is it legal?
- Is it consistent with Castrol's values and standards?
- Would I be comfortable if my manager, colleagues, or family could see what I am doing?
- How would I feel if it was reported publicly?
- Have I considered the impact on others – colleagues, customers, communities?
- Is this consistent with how Castrol has handled similar situations in the past?

If you have any doubt, stop and ask – speak to your line manager or Ethics & Compliance Liaison (ECL) before proceeding.

Who must follow this Code

This Code applies to all Castrol employees, directors, and contracted staff[1] worldwide.

Third parties acting on Castrol's behalf – including agents, distributors, suppliers, and joint venture partners – are also expected to act consistently with these standards as a condition of doing business with Castrol.

Castrol employees, directors, and contracted staff are expected to:

- Read and understand the Code
- Speak up when observing anything not aligned to the Code
- Manage risks in line with the Code
- Cooperate with Castrol investigations and audits.

Our Code applies both in person and online and your conduct does not have to occur in the workplace to violate our Code. For example, if your conduct breaches a Castrol requirement, negatively affects the workplace or impacts Castrol's legitimate business interests, then it may breach the Code, regardless of where the conduct took place.

Responsibilities for managers and leaders

Managers and leaders at Castrol have additional responsibility and are expected to:

- Model the behaviours in this Code visibly and consistently
- Create an environment where every team member feels safe to speak up without fear of retaliation
- Never ask, pressure, or allow team members to act in a way that violates this Code
- Address concerns raised by their team promptly and appropriately, and escalate to Ethics & Compliance in accordance with Castrol policies and procedures.

A manager who becomes aware of a potential violation and fails to act is in breach of this Code.

[1]Contracted Staff means an individual(s) who is engaged to support Castrol on specific work, services, or project activities through a supplier (e.g., a supplier of agency workers) or via a secondment from a Counterparty. Contracted Staff may work at Castrol's workplace and are usually under Castrol's day-to-day management and control, including receiving day-to-day work assignments from Castrol Management/Staff.

Speak Up

Castrol's culture is built on a strong foundation of integrity, accountability, and a commitment to responsible and ethical behaviour. These principles are reinforced through expectations that all employees act in accordance with the company's Code of Conduct and actively support a culture of compliance.

We all have a responsibility to raise concerns about potential violations of this Code or applicable law – whether they involve your own conduct or that of others. This will help Castrol protect and support you, your colleagues and the wider communities in which Castrol operates. Castrol's ability to identify and address problems depends on everyone speaking up.

We have a range of 'Speak Up' channels for you to use. You can raise concerns through:

- **Your line manager or a senior leader**
- **Ethics & Compliance**, Legal or other SMEs such as HSE&C, P&C, etc.
- **Castrol's OpenTalk hotline and** website (castrolopentalk.ethicspoint.com) – available 24/7, confidential, and anonymous reporting accepted in multiple languages.

All concerns are taken seriously and investigated appropriately. Castrol will not tolerate retaliation against anyone who raises a concern in good faith, cooperates with an investigation, or declines to participate in improper conduct. Retaliation is itself a disciplinary offence and can lead to disciplinary action up to and including termination.



Our people





Safety and wellbeing

Castrol is committed to providing a safe and healthy workplace for every employee, contractor, and visitor. Safety is never compromised for commercial reasons.

You are expected to:

- Follow all applicable health and safety requirements, including Castrol's Safety Leadership principles
- Report unsafe conditions, near-misses, and incidents immediately
- Never perform or direct others to perform work you believe to be unsafe
- Contribute to an environment where colleagues feel supported, respected, and able to perform at their best.

Respect in the workplace

Castrol is committed to a workplace where everyone is treated with dignity and respect. We do not tolerate discrimination, harassment, bullying, or violence in any form.

This means:

- **No discrimination** on the basis of race, ethnicity, gender, age, religion, sexual orientation, disability, or any other protected characteristic
- **No harassment** – including sexual harassment, bullying, or intimidating behaviour
- **No violence** – physical or verbal – of any kind.

These standards apply in Castrol offices, at work events, and in any work-related communication.

Inclusion

Castrol values diverse perspectives and is committed to creating an inclusive environment where everyone can contribute their best. We recruit, develop, and reward on the basis of merit and performance, free from bias.

Acting with integrity



Conflicts of interest

A conflict of interest arises when your interests or activities – or those of someone close to you – could influence, or appear to influence, your judgement in performing your role at Castrol.

You must:

- Be mindful of situations where outside interests or activities could conflict with Castrol's interests
- Disclose actual or potential conflicts to your line manager and Ethics & Compliance promptly and/or through Castrol's register, in line with our conflicts of interest requirements
- Recuse yourself from decisions where a conflict of interest exists.

Common examples include outside employment or board membership, personal relationships with suppliers or customers, and personal financial interests in companies that do business with Castrol.

Gifts, entertainment and hospitality[1]

Business gifts and hospitality are a normal part of relationship-building – but they can create real, potential or perceived conflicts of interest and expose Castrol to legal risk. Gifts, entertainment, and hospitality must never be intended to influence a business decision and must always have a legitimate purpose.

Key principles:

- Comply with Castrol's requirements on gifts, entertainment and hosting, including approval and recording requirements
- If there is a conflict between Castrol's gifts, entertainment and hosting requirements and applicable external requirements, including local laws, follow the strictest requirement
- When in doubt, stop – and ask first.

Anti-bribery and corruption

Castrol has zero tolerance for bribery and corruption in any form, anywhere in the world. You must never offer, give, request, or accept anything of value to improperly influence a business decision – whether involving a private individual or a government official. This applies regardless of local custom, commercial pressure, or whether a third party is acting on Castrol's behalf.

[1]See Gifts, Entertainment, Hosting and Incentives requirements.

Anti-money laundering and financial crime

Castrol is committed to preventing its business from being used to facilitate money laundering, terrorist financing, fraud, or other financial crime.

You must:

- Know your customers, suppliers, and business partners before entering into business relationships
- Be alert to unusual payment requests or transaction structures
- Never facilitate or ignore suspected financial crime
- Report concerns to Legal and Ethics & Compliance immediately.

Sanctions and trade controls[1]

Castrol operates globally and must comply with sanctions, export controls, and trade regulations across all jurisdictions in which it operates.

You must:

- Abide by all applicable sanctions, export controls, and trade regulations and related Castrol requirements
- Take steps to manage high-risk transactions
- Not export goods, technology, or services in violation of applicable export control laws.

If you receive a request that may involve a sanctioned party, a restricted export, or a boycott, stop and ask Legal or Ethics & Compliance before proceeding.

Fair competition

Castrol competes vigorously but always fairly and lawfully.

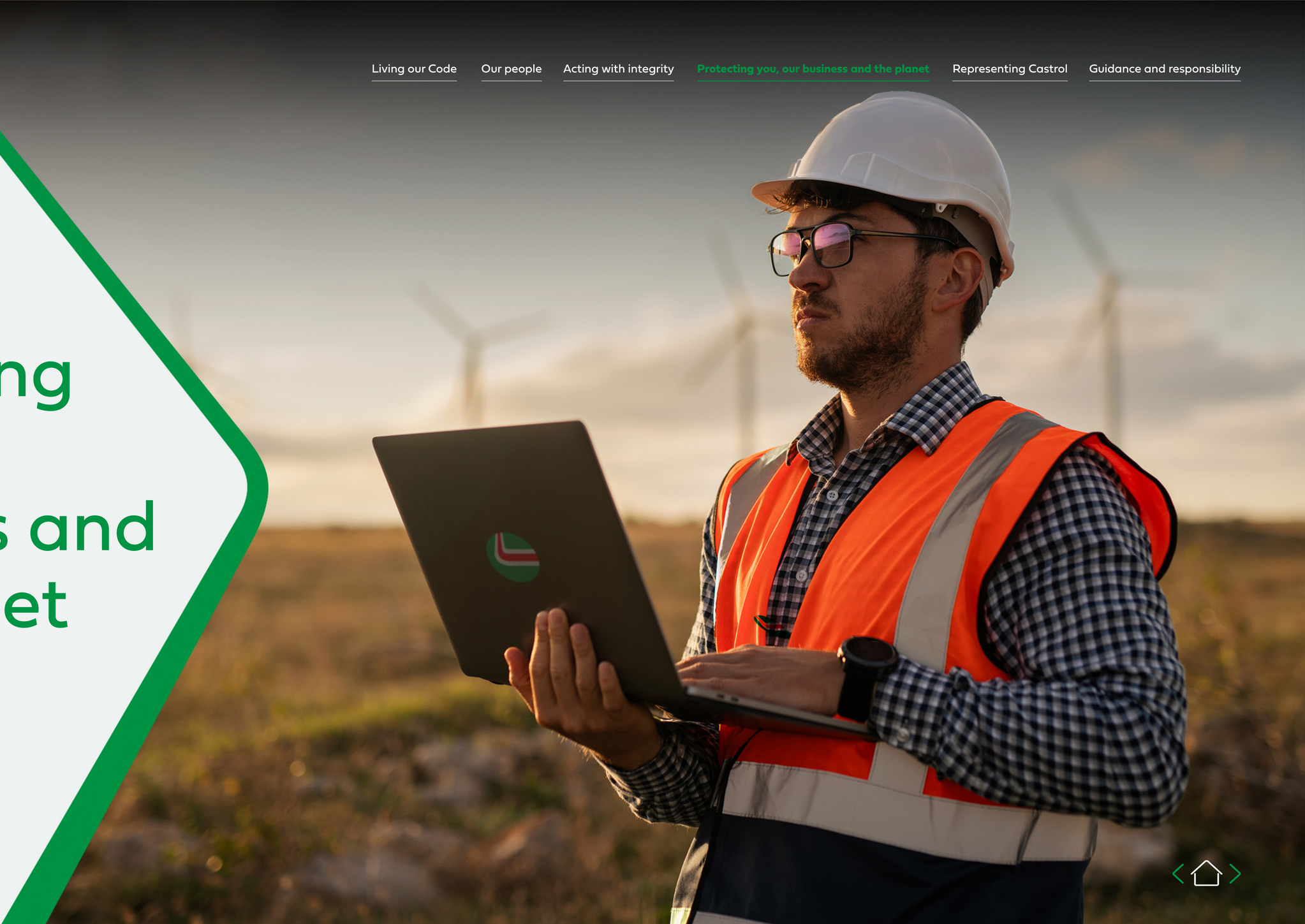
You must never:

- Agree with competitors on prices, market allocation, or bid-rigging
- Exchange commercially sensitive information with competitors
- Abuse a dominant market position
- Participate in trade association activity that crosses competition law boundaries.

If you are contacted by a competitor about any of the above, end the conversation immediately and report it to Legal and Ethics & Compliance.

[1]See Sanctions and Trade Controls requirements.

Protecting you, our business and the planet



Data protection and privacy

Castrol is committed to handling personal data responsibly and in compliance with applicable data protection laws.

You must:

- Collect and use personal data only for legitimate, specified purposes
- Keep personal data secure and report any suspected data breach immediately
- Never share personal data without appropriate authorisation.

Records and financial integrity

Castrol's books, records, and reports must accurately reflect all transactions and be maintained in accordance with applicable accounting standards and Castrol's internal controls.

You must never:

- Falsify, alter, or destroy records
- Make or approve payments you know to be improper
- Circumvent Castrol's internal controls or authorisation processes.

Protecting Castrol's assets and information

Castrol's assets – including physical property, financial resources, intellectual property, and confidential information – must be used for legitimate business purposes and protected from misuse, waste, or unauthorised disclosure. This obligation continues after you leave Castrol.

Castrol employees may from time to time have access to material non-public information[4] about Castrol, its customers, counterparties, or business partners.

You must never:

- Disclose confidential information to anyone who does not need it for a legitimate business purpose
- Use or disclose confidential or non-public information obtained through your work with Castrol to trade in securities or for any personal financial gain or other personal advantage.

[4] See Inside Information requirements.

Human rights and modern slavery

Castrol is committed to respecting human rights across its operations and supply chains. We do not tolerate forced labour, child labour, debt bondage, or any other form of modern slavery – in our own operations or those of our suppliers.

Anyone who suspects a human rights violation in Castrol's operations or supply chains must report it immediately.

Additionally, we recognise that our reputation as a partner and the continued success of our business depends on our ability to steward our operations in a responsible manner. Therefore, Castrol is committed to maintaining strong, transparent, and mutually beneficial relationships with the communities directly impacted by operations. You must notify Ethics & Compliance and Global Supply Chain in case you observe or are contacted about any related issue.

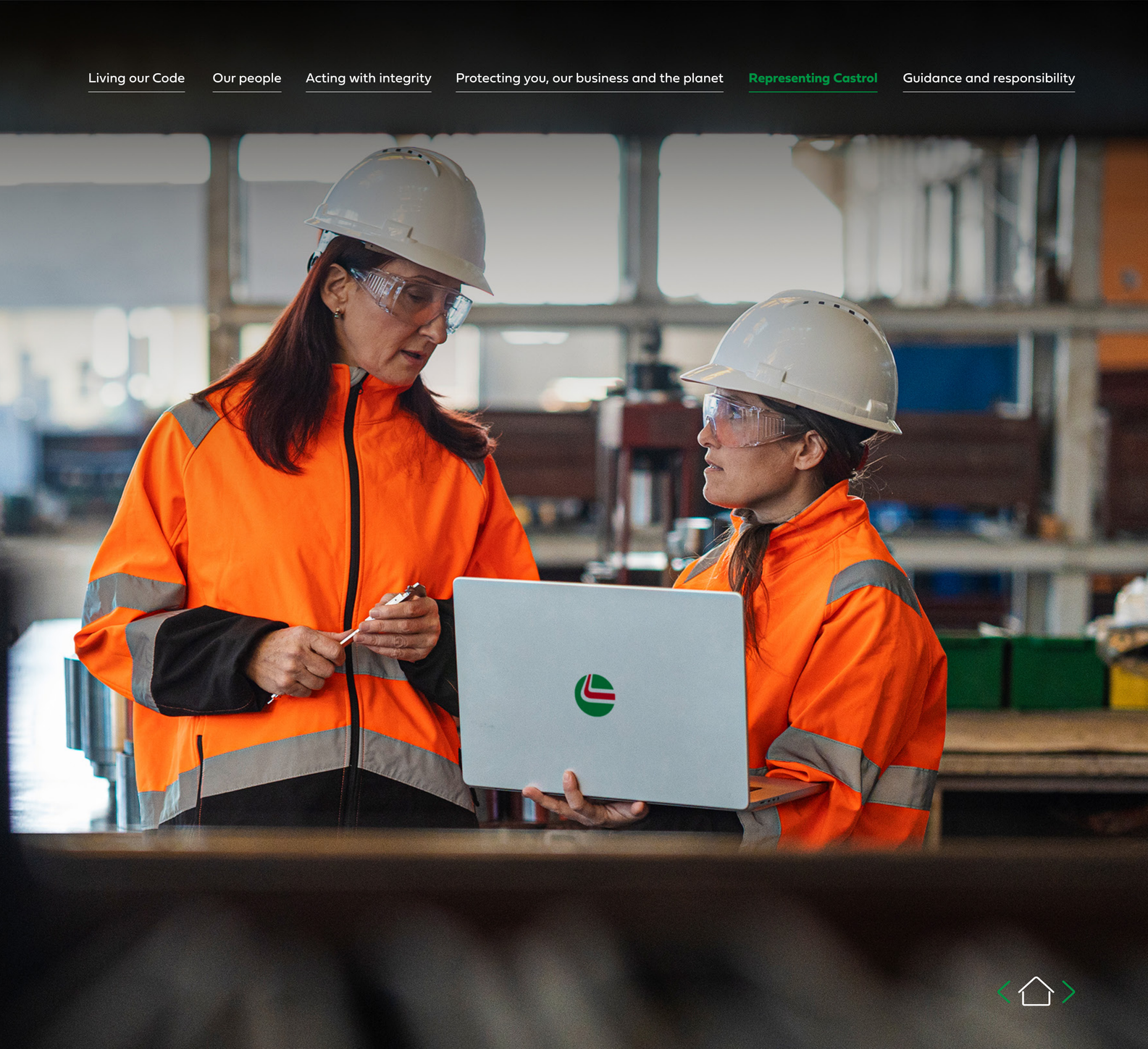
Sustainability and environment

We recognise that our business – including product manufacturing, logistics and use – may affect the environment, and we take that responsibility seriously. Castrol is committed to mitigating any potential effects by consistently optimising its environmental performance.

You must:

- Comply with all applicable environmental laws and regulations in every jurisdiction where Castrol operates
- Follow Castrol's environmental management standards and procedures
- Report environmental incidents, near-misses, or non-compliance immediately to your line manager or to HSE&C.

Representing Castrol



Public communications

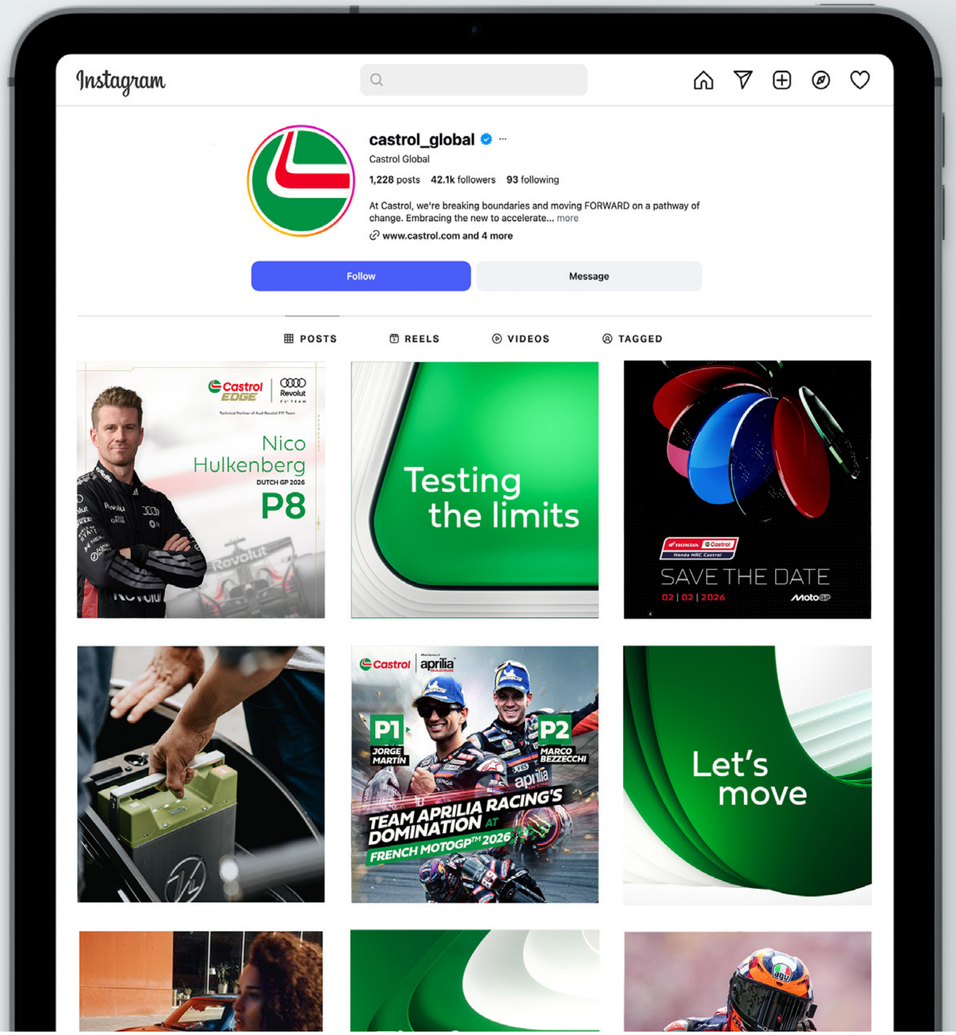
Castrol's reputation depends on consistent, accurate, and authorised communication with the outside world. This applies whether you are speaking on Castrol's behalf officially or posting as an individual on social media.

Official communications

- Only authorised spokespersons may speak to media, analysts, investors, or regulators on Castrol's behalf
- All press enquiries must be directed to Castrol's Communications and External Affairs team
- Never share confidential, commercially sensitive, or material non-public information in any external communication.

Social media

- You are personally responsible for what you post online
- Never post confidential Castrol information, including financial results, business plans, customer data, or personnel matters
- Do not make statements that could be misleading, defamatory, or damaging to Castrol's reputation
- If you identify yourself as a Castrol employee online, make clear that personal views are your own and do not represent Castrol
- Exercise good judgement – if in doubt, do not post.



Political activity

In accordance with applicable laws, Castrol exercises its right to make its position known on relevant issues. Castrol respects the right of employees to participate in the political process as private citizens. However, Castrol's business must remain separate from political activity.

You must not:

- Use Castrol's resources – including time, money, facilities, or systems – for personal political activity
- Represent personal political views as those of Castrol.

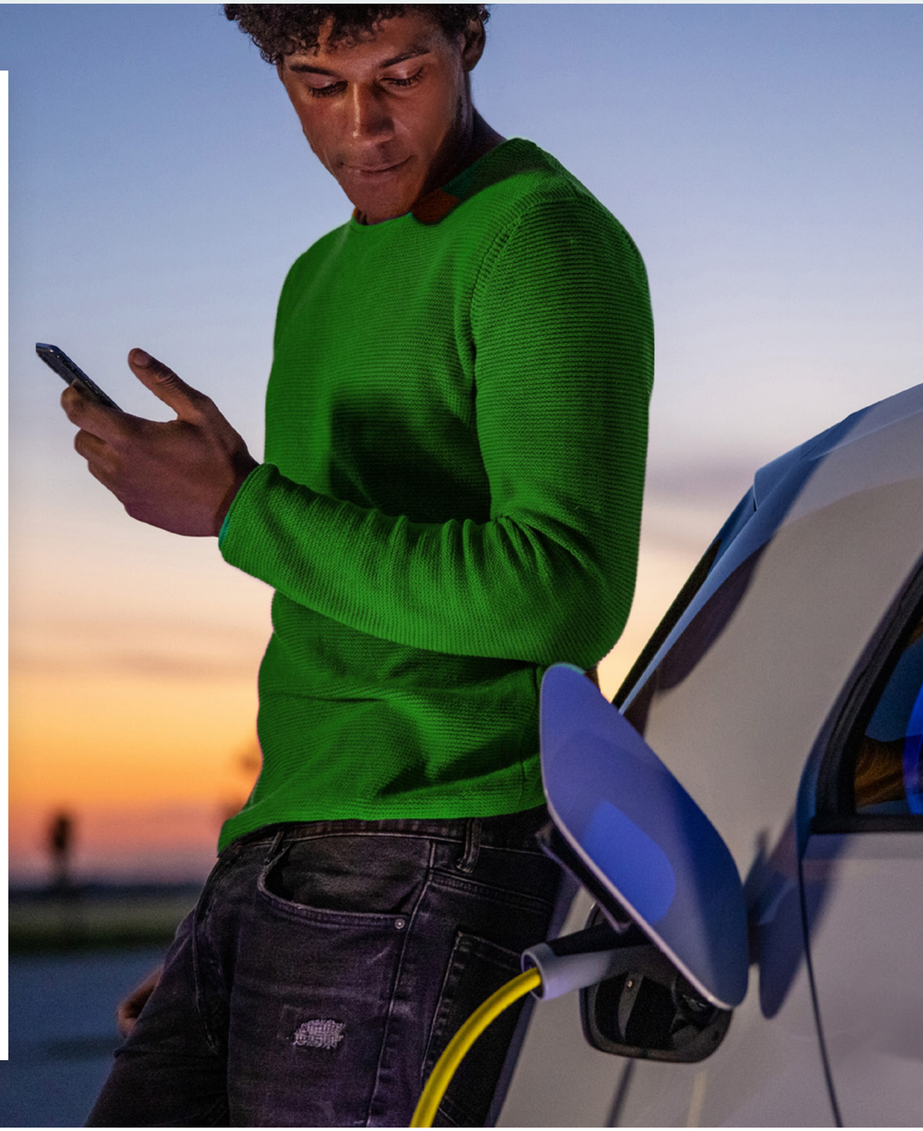
If your personal political activity creates or could create a conflict of interest with your role at Castrol, you must disclose it to Ethics & Compliance.

Digital ethics and technology

Castrol uses digital technology and data to drive performance and serve customers better. You are expected to use technology responsibly, ethically, and in accordance with Castrol's standards.

In particular:

- Use Castrol's systems and technology only for authorised business purposes
- Do not use artificial intelligence tools to process confidential Castrol data, customer information, or personal data without authorisation
- Do not access, copy, or share data beyond what your role requires
- Be alert to cybersecurity risks – including phishing, social engineering, and unauthorised access – and report suspected incidents immediately
- Ensure that any digital tools or platforms used in your work comply with Castrol's data privacy and information security requirements.



Third parties, contracted staff and vendors[5]

Castrol's commitment to ethical conduct extends beyond its own employees and directors. Third parties acting on Castrol's behalf are expected to act consistently with the standards in this Code as a condition of doing business with Castrol.

Specifically:

- **Contracted staff** are subject to the same conduct standards as employees while engaged by Castrol
- **Suppliers, vendors, and distributors** are expected to uphold standards consistent with this Code – including on human rights, anti-bribery, and fair competition
- **Agents and intermediaries** are expected to uphold standards consistent with this Code and are subject to heightened scrutiny – Castrol is responsible for conduct carried out in its name, regardless of who carries it out
- **Joint venture partners** are expected to operate consistently with these standards within any joint venture in which Castrol participates.

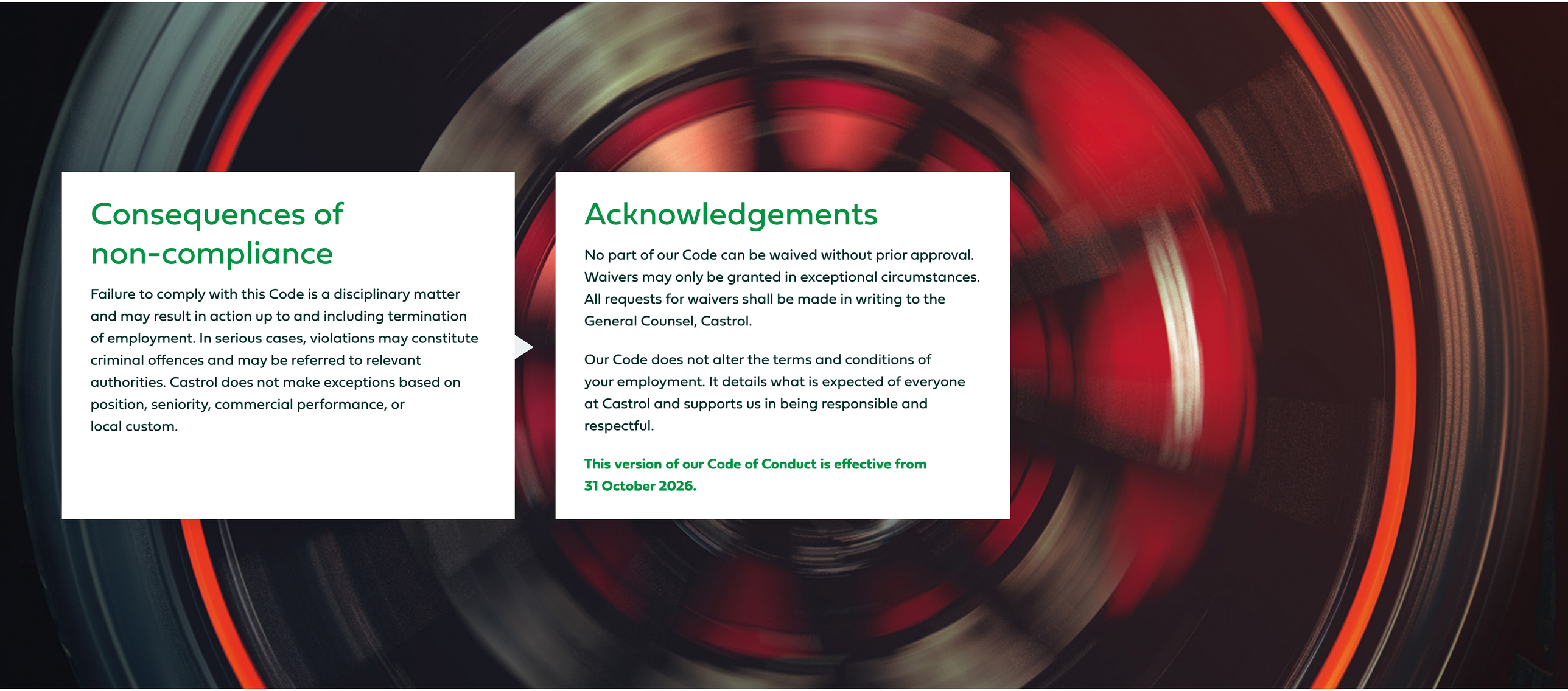
Castrol conducts risk-based due diligence on third parties before engagement and monitors compliance on an ongoing basis. Third parties who violate these standards risk termination of their relationship with Castrol and, where appropriate, referral to relevant authorities.



[5]See Counterparty Due Diligence and Risk Management requirements.

Guidance and responsibility





Consequences of non-compliance

Failure to comply with this Code is a disciplinary matter and may result in action up to and including termination of employment. In serious cases, violations may constitute criminal offences and may be referred to relevant authorities. Castrol does not make exceptions based on position, seniority, commercial performance, or local custom.

Acknowledgements

No part of our Code can be waived without prior approval. Waivers may only be granted in exceptional circumstances. All requests for waivers shall be made in writing to the General Counsel, Castrol.

Our Code does not alter the terms and conditions of your employment. It details what is expected of everyone at Castrol and supports us in being responsible and respectful.

This version of our Code of Conduct is effective from 31 October 2026.

Where to get help

Question or concern	Who to contact
Not sure if something is allowed	Your line manager or another manager, Ethics & Compliance Liaison (ECL) or any relevant advisor such as P&C, HSE&C, Legal
Want to raise a concern confidentially	Any 'Speak Up' channel - Your line manager, another manager or Senior Leader, any relevant advisor such as Ethics & Compliance, P&C, HSE&C, Legal or contact OpenTalk via phone or at castrolopentalk.ethicspoint.com
Gifts or hospitality question	Your line manager or another manager or Ethics & Compliance
Conflict of interest	Your line manager or another manager or Ethics & Compliance
Suspected bribery or financial crime	Ethics & Compliance immediately
Sanctions, export controls, or trade query	Legal
Competition law concern	Legal immediately
Inside information concern	Legal immediately
Data protection or privacy query	Data Privacy Manager or Legal
Social media or communications question	Communications and External Affairs
Political activity concern	Ethics & Compliance
Digital or AI tools question	Digital
HR or workplace conduct issue	P&C
Safety concern	Your line manager or HSE&C
Third-party conduct concern	Ethics & Compliance immediately
Joint venture or subsidiary governance	CoSec



2026 Code of Conduct

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