
**THE AUTO CLUB GROUP
SUPPLIER
CODE OF CONDUCT**



DO
what's
RIGHT



EXPECT *something* MORE™

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Code of Conduct for Suppliers, Consultants and Contractors

Expected Shared Behaviors

Although they are not employees of ACG, Suppliers may work on ACG premises or have direct contact with ACG employees, members, or insureds, and are therefore expected to share ACG's commitment to creating and maintaining an ethical work environment.

Who this Code Covers

This Code of Conduct (Code) is for third-party vendors, consultants, contractors, agents and their representatives (Suppliers) who provide Auto Club Group (ACG) products and services, either exclusively or non-exclusively, in the course of doing business. Suppliers are expected to share ACG's commitment to creating and maintaining an appropriate work environment as outlined in ACG's Values, Code of Conduct and Corporate Policies.

Purpose

The ACG Code for Suppliers, Consultants & Contractors describes the professional standards expected of our partners. It also communicates an overview of behavioral requirements that Suppliers are expected to follow to ensure a business relationship that consistently aligns with ACG standards of conduct.

Professional Conduct

Suppliers are required to conduct themselves in a professional and ethical manner when performing services for ACG. Suppliers' behavior should never be detrimental to the interests or image of ACG, its employees, members or customers. ACG is committed to creating a work environment free of harassment and bullying and our Suppliers are expected to partner with us to prevent a hostile work environment.

Conflict of Interest

Suppliers may not place their personal interests ahead of ACG's interests when performing duties for ACG.

Gifts, Gratuities and Entertainment

Sharing inexpensive business meals and exchanging nominal (\$100 or less) tokens of appreciation are generally fine between Suppliers and ACG employees. Gifts of cash or cash equivalents, such as gift cards, are never allowed.



Code of Conduct for Suppliers, Consultants and Contractors

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Company Assets

Those working on ACG's behalf are trusted to behave responsibly and use good judgment when using ACG assets. These assets include, but are not limited to:

- Company-Owned Vehicles
- Internet Access
- Electronic Mail
- Postage
- Equipment
- Property and Facilities
- Furnishings
- Supplies
- Information
- Time

Compliance

Performance of Duties - Suppliers will be responsible for complying with any and all local, state, and federal laws, regulations, and executive orders as they pertain to the performance of duties and associated training, including, but not limited to, EEO, Anti-Money Laundering/OFAC, Anti-Discrimination, Anti-Trust, Public Health, Cyber/Data Security and Consumer Privacy Protection.

Employment - Suppliers will monitor and confirm compliance with applicable regulatory requirements regarding employment of their employees.

Systems access - If Supplier or Supplier employees ("Authorized Users") require access to ACG systems, the Supplier will complete and ensure compliance with the requirements set forth in the [Third-Party Systems User Access Agreement](#).

Protecting Company Assets

Suppliers working for ACG are trusted to behave responsibly and use good judgment when using ACG assets. They have a responsibility to use ACG equipment and/or other assets for authorized business purposes.

Business and Financial Records

Suppliers and ACG must keep accurate records of all matters related to the Supplier's business with ACG. This includes the proper recording of all expenses and payments. If ACG is being charged for a Supplier representative's hours, time records must be complete and accurate. Suppliers should not delay sending an invoice or otherwise enable the shifting of an expense to a different accounting period.

Licensing

Suppliers are responsible to obtain all necessary business and producer licenses and state registrations that may be required of them or their staff.



Code of Conduct for Suppliers, Consultants and Contractors

(continued)

Safeguarding Confidential and Proprietary Information

Suppliers must maintain the confidentiality of all non-public ACG information, except when disclosure is authorized or legally mandated. Confidential non-public ACG information includes both the non-public personal information of customers and all information relating to ACG's conduct of business not disseminated to the public. This information must be secured and not accessible to the public. Furthermore, Suppliers may not use, share or disseminate any information gained in the course of conducting ACG business for any reason other than to further the legitimate purpose for which the information was obtained.

Information Security

All communications, data and information sent or received using ACG technology/systems are ACG property. As such, they are not private communications between the senders/receivers and ACG may monitor and access them at any time. Suppliers must cooperate with ACG to provide access to information on those systems when and as needed. Suppliers will make no direct or indirect attempt to access any ACG files or computer systems by using someone else's authorization, computer identification or circumventing access control.

ACG Representation

Suppliers must not represent their opinions and/or ideas as those of ACG throughout communication channels, including but not limited to, video, radio or social media.

Sustainability

ACG expects our Suppliers to remain socially and environmentally responsible to the extent applicable.

Diversity, Equity and Inclusion

ACG values its commitment to diversity, equity and inclusion. It is our expectation that Suppliers share in diverse, equitable and inclusive cultural behavior, values and principles.



Code of Conduct for Suppliers, Consultants and Contractors

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Safeguarding Vulnerable Groups

Suppliers are expected to comply with all laws prohibiting forced labor and employment of underage children, human trafficking as well as laws protecting elders from financial abuse.

Safety

ACG expects Suppliers to perform duties in accordance with OSHA and similar safety standards to avoid illness or injury to themselves or others. This includes being compliant with the [Occupational Safety and Health Administration \(OSHA\) Hazard Communication Standard](#) (Title 29 Code of Federal Regulations Part 1910.1200), when applicable. Suppliers may be subject to business line or location specific safety requirements.

Reporting

Suppliers are required to notify [ACG Security & Investigations](#) of any known or suspected violations of law, fraud or other misconduct affecting ACG. Reports can be made through the ACG Fraud & Ethics Reporting Line at 1-877-TELL-AAA. Calls to this reporting line may be made anonymously. This line may also be used to raise questions, issues or concerns related to any business conduct or ethical issue. Reports may also be emailed to [ACG's Special Investigations Unit](#). No one will be penalized for reporting, in good faith, concerns related to misconduct or ethical violations.