



# Supplier Code of Conduct





Enterprise Mobility\* was founded in 1957 with a fleet of seven cars that has since expanded to a global network of mobility solutions. In more than 90 countries and territories around the world, Enterprise Mobility's range of transportation and travel offerings for consumers and corporate partners continues to evolve, with a focus on re-imagining a future for mobility that is more accessible, efficient and sustainable. Through its subsidiaries and franchisees, and affiliates, Enterprise Fleet Management, the organization operates one of the largest fleets of vehicles in the world with a global network of nearly 9,500 neighborhood and airport locations, working with local and global suppliers who have become critical partners in helping to deliver exceptional service.

Suppliers and partners are selected who share our values and our commitment to uphold the highest standards of quality, integrity, excellence, safety, legal compliance, and respect for human rights, as well as our respect for the customs and culture of the communities we serve. To help promote a common

understanding of what is expected of suppliers, we have developed a Supplier Code of Conduct. All suppliers are expected to understand the Code and adhere to its spirit and intent. This Code is also available on [www.enterprisemobility.com](http://www.enterprisemobility.com).

As our valued partner, we hope you will take the opportunity to review the principles outlined and, as appropriate, share them with members of your organization who work with Enterprise Mobility™. If you have questions, or if you believe that any company or individual working for or on behalf of Enterprise Mobility has violated this Supplier Code of Conduct or engaged in illegal or unethical behavior, we encourage you to reach out to your main point of contact at Enterprise Mobility or via Enterprise Mobility's Ethics Hotline.

We rely on a broad network of suppliers and business partners. Thank you for being a part of that network and for helping us strengthen our commitment to deliver exceptional service for customers and communities.

\*Enterprise Mobility is an umbrella brand name used to reference Enterprise Rent-A-Car, National Car Rental, Alamo Rent A Car, Enterprise Car Sales, Enterprise Car and Ride Sharing, and/or other brands. Various corporate entities exist within the Enterprise Mobility brand, and references to Enterprise Mobility are not intended to convey or supplant existing corporate structure. Please visit the Enterprise Mobility website for additional information. This Supplier Code of Conduct and the principles underlying it have been adopted by Enterprise Holdings, Inc., Enterprise Fleet Management, Inc., and, individually, by management of each subsidiary company.

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# INTRODUCTION

Enterprise Mobility is committed to building mutually beneficial, long-term relationships with business partners and suppliers who share the commitment to conducting business with honesty and integrity. This Supplier Code of Conduct (referred to herein as this “Code”) outlines our expectations and provides guidance for suppliers, vendors, agents, business partners, consultants and contractors (collectively referred to as “Suppliers”) on how we can work together to meet the shared goal of delivering a best-in-class customer service experience throughout our business operations. Enterprise Mobility expects all Suppliers to embrace the standards and principles of this Code, and non-compliance, could include consequences up to and including termination of the business relationship.





# GOVERNANCE

## EXPECTATIONS OF MANAGEMENT

Enterprise Mobility expects its Suppliers to manage their businesses in a manner that fosters a culture of compliance, both with legal requirements and with the standards and principles outlined in this Code.

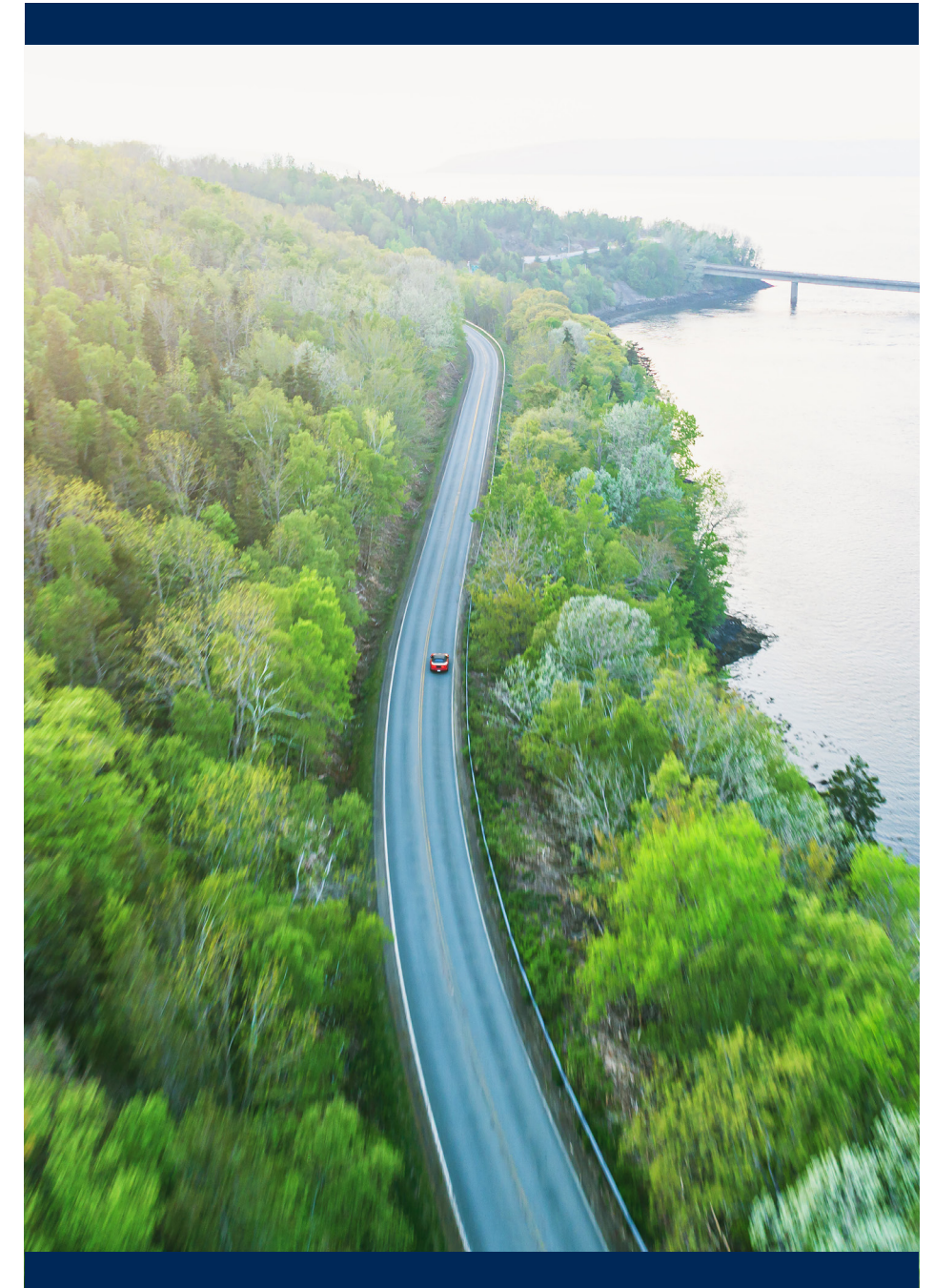
## ACCOUNTING AND BUSINESS RECORDS

In addition to complying with the practices and behaviors outlined in this Code, Enterprise Mobility expects Suppliers to ensure that their respective accounting and business records are complete, honest, and accurate. All financial records must conform either to a reasonable system of internal controls or, where applicable, to generally accepted accounting principles. Suppliers are expected to report transactions and events in a clear, timely and accurate manner. From time to time, we may ask to review a Supplier's records or visit their facilities as allowed by individual contracts.

## RISK ASSESSMENT

Suppliers are expected to regularly monitor their businesses, supply chains, and operations for violations of law and of this Code, as well as to identify other areas for improvement. Suppliers are also expected to be responsible for managing their supply chain, including subcontractors and third-party labor agencies, in accordance with the standards contained in this Code.

We expect Suppliers to develop and maintain processes that identify risks in all areas addressed in this Code, assess the significance of each risk, and implement appropriate procedures and controls to minimize the identified risks.



# PRACTICES

## ETHICAL SALES PRACTICES

Suppliers involved in selling, advertising, promoting, and marketing on Enterprise Mobility's behalf must ensure that the statements they make about our products and services are fair, factual and complete.

## CONTRACT COMPLIANCE

This Code is intended to complement, rather than replace any legal agreement or contract between a Supplier and Enterprise Holdings, Inc., and/or its operating subsidiaries and/or affiliates, whether the agreement is executed collectively or with single operating subsidiaries and/or affiliates. Failure to abide by the terms or conditions of an existing agreement violates the trust that has been mutually built over the course of our working relationship and may have legal consequences. In the event of any discrepancies between this Code and an applicable supplier agreement, the supplier agreement will control.

## GOVERNMENT CONTRACTS

Some Enterprise Mobility entities are contractors with the federal government, which can require adherence to additional rules and regulations, including but not limited to, specific operational controls, standards of ethical business conduct, audit accessibility, reporting and assurances of compliance with certain labor and employment regulations, as well as other laws.

As these provisions extend to Enterprise Mobility sub-contractors and Suppliers, we expect full compliance with these rules and requirements, whether or not specifically stated in a contract.

All Suppliers are invited to discuss any concerns about the nature of a contract or a specific requirement with your immediate point of contact at Enterprise Mobility.

## WORKING WITH DIVERSE SUPPLIERS

Enterprise Mobility strives to maintain a Supplier base that reflects the communities in which the subsidiaries operate. To this end, we provide equal opportunities to minority-owned businesses: Minority Business Enterprise (MBE certified); women-owned businesses: Women Business Enterprise (WBE certified); veteran-owned businesses: Veteran-owned Small Business (VOSB); Service Disabled Veteran-owned Business (SDVOSB); and disadvantaged and small businesses: Disadvantaged Business Enterprise (DBE certified), Small Disadvantaged Business (SDB certified), LGBTQ+ certified businesses (LGBTBE certified), ACDBE certified, 8(a) certified, and HubZone certified; and any other socially or economically disadvantaged small businesses. Enterprise Mobility aims to increase and maintain these relationships, while working only with partners who provide products and services of the highest quality.



# HONESTY AND INTEGRITY



## LEGAL COMPLIANCE

All business activities of a Supplier must comply with applicable laws and regulations of the countries in which they operate.

## CONFLICTS OF INTEREST

A conflict of interest occurs when an individual's personal interests interfere with his or her ability to make unbiased business decisions. When working on Enterprise Mobility's behalf, Suppliers' actions should be based on sound business judgment, not motivated by personal gain. Each Supplier must avoid any situation that creates—or appears to create—a conflict between a personal interest and Enterprise Mobility's interests.

Conflicts of interest, whether actual or potential, should be disclosed to the Suppliers' main point of contact at Enterprise Mobility or Enterprise Mobility's ethics hotline as soon as possible, so that they can be addressed and/or resolved appropriately.

## GIFTS AND ENTERTAINMENT

Business gifts, entertainment, or any other item of value, can be common courtesies between business

partners. However, such a courtesy should never compromise the ability to make objective business decisions. In some circumstances, business gifts and entertainment may be acceptable. Any courtesy, given or received, must be in compliance with applicable law. For guidance on what is acceptable, please consult your immediate point of contact at Enterprise Mobility.

## **ANTI-CORRUPTION**

Enterprise Mobility does not tolerate bribery. Suppliers must not make, offer, give, or promise to make, offer, or give, directly or indirectly, any loan, gift, donation, discount, or payment, or transfer of anything of value, whether in cash or in kind, to or for the benefit of any Government Official (as defined below) for improper reasons, including to secure improper advantage, gain influence, or reward improper performance of any function or activity. Suppliers must not permit, or engage in embezzlement, extortion, kickbacks or reciprocity, or other forms of corruption in connection with their business relationship with Enterprise Mobility.

Additionally, Suppliers may not give or receive a bribe, kickback, or improper payment to or from any person or organization – regardless of whether that person or organization is a Government Official – for the purpose of obtaining or retaining business or other improper business advantage.

For purposes of this Code, the term “Government Official” means any officer or employee of any agency, instrumentality, subdivision, or other body of national, regional, or municipal government; commercial or similar entity that the government controls or owns, including state-owned and state- operated companies or enterprises; public international organization (e.g., United Nations, World Bank); political party or official thereof; or candidate for political office.

## **ANTI-MONEY LAUNDERING**

Enterprise Mobility expects Suppliers to comply with all applicable statutes governing the prevention of money laundering and expects Suppliers not to participate in any money laundering activity.

## **FAIR COMPETITION**

Suppliers are expected to comply with all applicable antitrust and fair competition laws and regulations and to avoid any action that would illegally restrain or thwart the efforts of competitors. These laws prohibit practices in restraint of trade, such as price fixing, predatory pricing, misrepresenting, or harassing a competitor, stealing trade secrets, dividing customers, offering or taking bribes and accepting kickbacks.

## **COMPANY PROPERTY**

Theft, carelessness, and unnecessary waste have a direct impact on our mutual success. When Enterprise Mobility entrusts vehicles or other business property to a Supplier, these assets must be used only for intended and authorized business purposes. Suppliers are responsible for protecting Enterprise Mobility’s property and not putting it at risk for loss, theft, or damage.



## PROTECTING INFORMATION

Enterprise Mobility places the highest priority on protecting the privacy and personal information of customers and team members. As our partners in business, Suppliers are also responsible for helping to ensure the protection of confidential information, intellectual property, and personal information belonging to Enterprise Mobility customers and team members. Suppliers with access to these types of information may not disclose it to other parties without Enterprise Mobility's expressed consent.

Confidential information includes but is not limited to customer or team member lists, customer or team member personal information, computer files, policies and practices, marketing plans, pricing, costs, and other financial information. Suppliers should limit access to those who have a business need and take every precaution necessary to avoid the improper release of proprietary or confidential information.

Likewise, Suppliers with access to personal information about Enterprise Mobility's customers and team members must ensure that this information is adequately safeguarded in accordance with all applicable data privacy and information security laws and regulations and consistent with best practices and security

standards in Supplier's industry. The level of security and protection shall be commensurate with the nature of the Enterprise Mobility information that needs to be protected.

Suppliers must maintain the appropriate process and internal controls for paper records, computer systems, portable electronic devices, laptops, and other storage devices to assure the protection of this information. Suppliers must promptly notify Enterprise Mobility of any actual or potential data security breach involving Enterprise Mobility's personal information.

Suppliers are also expected to follow all applicable securities laws and standards, such as Payment Card Industry Data Security Standards (PCI-DSS) to protect cardholder information from various imminent harms.

## EXPORT AND IMPORT REGULATIONS

Suppliers must comply with all applicable import and export control laws, including without limitation, sanctions, embargoes and other laws, regulations, government orders, and policies controlling the transmission or shipment of goods, technology, and payment.







# TEAMWORK

## HARASSMENT

At Enterprise Mobility we expect Suppliers to treat others with respect, meaning that harassing conduct is not acceptable in any form. While harassment may have different definitions, we consider it to include any unwelcome behavior, sexual or non-sexual, toward another person that has the purpose or effect of creating an intimidating, hostile, or offensive work environment.

## DISCRIMINATION

Organizations are made stronger by respecting and fostering a diversity of backgrounds, cultures, and opinions. Suppliers are expected to observe and promote laws that prohibit discrimination based on a person's race, color, religion, sex, national origin, disability, age, sexual orientation, gender identity, veteran status or any other

status protected by federal, state and local laws. Suppliers must be committed to fair and equal treatment for, and the personal privacy and dignity of, every employee and applicant for employment.

## FOLLOWING SAFETY PROCEDURES

Supplier workplaces must adhere to all applicable occupational health and safety laws and regulations, and also take the proper precautions to ensure that all machinery and tools are functional and used properly at all times.

To ensure personal safety as well as the safety of products and services provided to the community, and in accordance with applicable law, Enterprise Mobility Suppliers must, at Supplier's expense, where applicable, provide all workers with appropriate protective equipment and ensure any occupational health and safety measures are available to its workers. Suppliers must also ensure



that, where applicable, workers are fully certified and capable of performing their job duties and operate only the authorized equipment they have a business reason to use.

When accidents occur on the premises of, or while performing work for Enterprise Mobility, Suppliers must report them right away to their immediate point of contact at Enterprise Mobility. Suppliers must also agree to share their safety records with Enterprise Mobility upon request.

## **EMERGENCY PREPAREDNESS**

Suppliers must have plans to prevent, detect, and respond to situations threatening the security and safety of all employees and customers. Workers shall be familiar with such plans.

## **BUSINESS CONTINUITY**

Suppliers should maintain a business continuity plan that minimizes business impacts in the event of a major disruption.





# COMMUNITY



## WORK AUTHORIZATION

Suppliers must implement hiring practices that accurately verify workers' legal right to work in the applicable jurisdiction prior to employment.

## WORKING HOURS AND FAIR WAGES

For the benefit of the communities we serve, Enterprise Mobility expects Suppliers to follow all applicable wage and hour laws, including minimum wage, overtime, and maximum hour rules.

## HUMAN RIGHTS

Suppliers shall provide employees an environment respectful of human dignity and their fundamental rights. Enterprise Mobility will not tolerate underage labour (as defined under applicable law), forced labor, or any other unacceptable treatment of workers and will not partner with companies that employ any underage or forced labor, either directly or indirectly. Suppliers must not permit exploitation of children, physical punishment or abuse, or involuntary servitude. Suppliers shall not use child labor and should adopt procedures to verify that no workers are younger than the applicable legal age for employment. Suppliers must follow all applicable laws, regulations, and standards concerning working conditions for all workers. Supplier's employees



should not be required or allowed to pay labor agent, recruitment or other fees to obtain their employment.

Suppliers and their subcontractors must not use conflict minerals, whose obtainment is linked to human rights violations. Where applicable, Suppliers must meet the conflict reporting requirements by the Dodd-Frank Wall Street Reform and Consumer Protection Act and the Securities and Exchange Commission.

Suppliers are required to comply with all applicable labor laws and regulations. Suppliers shall undertake compliance with all the provisions relating to undeclared work and foreign workers and shall only have their services performed by such persons if they are regularly employed. Suppliers shall implement policies and procedures to ensure that the foregoing obligations are met. Suppliers shall notify Enterprise Mobility immediately as soon as they become aware of any actual or suspected breach of any of their obligations under this clause.

### **SUBCONTRACTORS/THIRD PARTY EMPLOYMENT AGENCIES**

Suppliers are responsible for educating and training subcontractors and ensuring subcontractors are compliant with the provisions of this Code and the law.

### **PROTECTION OF THE ENVIRONMENT**

Suppliers must comply with all environmental laws and regulations where our business is conducted, including, as applicable, laws and regulations restricting the production and use of mercury or mercury compounds and handling of mercury waste products; and the production, use, handling, collection, transportation, storage, disposal, import and export of chemicals and hazardous waste. Suppliers are encouraged to minimize the use of non-renewable resources, reduce and recycle waste, and minimize the environmental impact of their operations where possible. Suppliers sourcing products should present environmentally preferable options and ensure that materials are disposed of in an environmentally responsible manner.

### **SUSTAINABILITY**

Suppliers shall aspire to develop, implement, and maintain environmentally responsible business practices, such as seeking ways to conserve natural resources and energy, reduce waste and the use of hazardous substances, and minimize adverse impacts on the environment.



# ETHICS HOTLINE

## HOW TO RAISE CONCERNS AND REPORT CODE VIOLATIONS:

If a Supplier of any of its employees observe or reasonably suspect an individual, whether Supplier or Enterprise Mobility team member or contractor, to be in violation of this Code, Enterprise Mobility urges the Supplier or its employee to report the incident to the Supplier’s main point of contact at Enterprise Mobility. Enterprise Mobility also supports a third-party-administered ethics hotline that Suppliers may use to report anonymously, where allowed by law.

Enterprise Mobility promptly and thoroughly investigates all reports made through the Ethics Hotline and keeps these reports confidential to the degree possible. Enterprise Mobility will take corrective action when warranted.

Suppliers and their employees have the opportunity to raise concerns without fear of retaliation. Enterprise Mobility does not tolerate retaliatory acts against anyone who makes a report in good faith, even if the reporter is not positive that it is correct.

### ONLINE:

Visit [www.ethicspoint.com](http://www.ethicspoint.com) and enter “Enterprise Mobility” as the Organization.

### BY PHONE:

**Call the Ethics Hotline, and an intake specialist will take your report:**

- North America:** 1-888-238-1483
- United Kingdom:** (BT) 0800-89-0011 or (C&W) 0500-89-0011, then at the prompt, dial 1-888-238-1483
- Ireland:** 1-888-550-000, then at the prompt, dial 1-888-238-1483
- Germany:** 0-888-2255-288, then at the prompt, dial 855-405-4736
- France:** 0-800-99-1111, then at the prompt, dial 855-405-4736
- Spain:** 900-99-0011, then at the prompt, dial 855-405-4736

### SCAN:

