

## Supplier Code of Conduct

This Supplier Code of Conduct (“Code”) articulates the expectations of OPENLANE, Inc. and its subsidiaries regarding the conduct of companies (and individuals) which supply goods or services to OPENLANE (“Suppliers”).

OPENLANE expects to do business with Suppliers that meet OPENLANE standards and behave consistently with, and positively reflect, OPENLANE’s values. OPENLANE expects that Suppliers will satisfy contractual requirements, comply with laws and regulations, and conform performance to the standards of this Code.

This Code contains general requirements applicable to Suppliers. A Supplier’s contract with OPENLANE may contain more specific provisions addressing some of these same issues. If there is a conflict or inconsistency between this Code and a Supplier contract, the terms of the Supplier contract will govern.

### **Integrity & Ethics**

OPENLANE is committed to conducting business with integrity and in full compliance with applicable laws and regulations. Bribes, kickbacks and other similar payments are strictly prohibited. Suppliers must ensure that all laws and regulations are fully complied with in relation to bribery, corruption and any other prohibited or improper business practices.

### **Health & Safety**

OPENLANE is committed to a safe and healthy work environment. OPENLANE expects its Suppliers to comply with all applicable safety and health laws and regulations wherever they operate. Suppliers must have policies, procedures and practices in place to ensure the health and safety of their employees and take all necessary steps to provide a safe working environment. When at an OPENLANE facility, Suppliers will comply with all applicable OPENLANE policies and requirements.



## **Discrimination & Harassment**

OPENLANE supports diversity and equal opportunity in the workplace. OPENLANE expects its Suppliers to uphold the same commitment by complying with all applicable laws, rules and regulations concerning their employment practices. Suppliers must not discriminate on the basis of race, sex, age, religion, color, gender, gender identity or expression, national origin, ethnicity, citizenship, ancestry, sexual orientation, marital status, veteran status or any other traits protected by law. Suppliers should not tolerate any form of harassment, whether verbal, visual or physical, in the workplace.

## **Human Rights**

OPENLANE respects the human rights and dignity of people throughout its operations and supply chain. OPENLANE expects our Suppliers to comply with laws promoting fair wages, appropriate working hours, safe working conditions and individual security, as well as laws prohibiting forced or underage labor and human trafficking. Suppliers should respect the rights of their employees to associate or not associate with any groups or organizations, as permitted by and in accordance with applicable laws and regulations.

## **Environment**

OPENLANE is committed to protecting and respecting our environment. OPENLANE expects its Suppliers to follow all applicable environmental laws, regulations, and standards. This includes requirements for chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits, and environmental reporting.

## **Information & Assets**

OPENLANE's assets, including its intellectual property, are critical to OPENLANE's business. Suppliers must protect and preserve OPENLANE's assets, whether tangible or intangible. Suppliers are expected to safeguard proprietary, confidential and sensitive information of OPENLANE and its employees, customers, business partners and the public. Suppliers must take all due care in handling, discussing, processing,



transmitting, storing and disposing of confidential, proprietary and/or sensitive information that could affect OPENLANE, its employees, customers, business partners or the public.

## **Business & Financial Records**

Suppliers must provide accurate, honest, complete and timely reports and communications regarding financial condition and operations. OPENLANE expects suppliers to maintain books and records that reflect all transactions in an accurate, honest, complete and timely way.

## **Accountability & Compliance**

While Suppliers are expected to self-monitor and demonstrate their compliance with this Code, Suppliers will cooperate with any information requests or audits OPENLANE may initiate to confirm such compliance. OPENLANE may terminate its business relationship with a Supplier for failure to comply with this Code. Each Supplier is responsible for ensuring that its employees, representatives and subcontractors comply with this Code.

Effective Date: February 25, 2019

*Last Updated: May 15, 2023*