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



DO

what's

RIGHT



EXPECT *something* MORE™



A Message from Joe Richardson

President & CEO

To my ACG colleagues,

Do what's right. Three small words that convey how we operate as a business, employer and community member. Whether an ACG employee, officer, board member, agent or partner - you play a critical role in demonstrating the reality behind these words.

As stated in our corporate values, we are open, honest, ethical and personally accountable. We safeguard our assets and protect confidential information. We create an inclusive and welcoming environment of diverse backgrounds, experiences and viewpoints, realizing our differences make us stronger.

Join me in learning and implementing the principles outlined in this Code. As each of us takes individual ownership of doing what's right, together as OneACG we construct ACG's strong ethical foundation. By doing this, we ensure the long-term success of our organization and the continued confidence of our colleagues, members, customers and local communities.

Thank you for everything you do and for being part of the ACG team.

Sincerely,

A handwritten signature in black ink that reads "Joseph J. Richardson Jr." with a stylized flourish at the end.

Joseph J. Richardson Jr.
President & CEO
The Auto Club Group



Our Values Confirm Our Commitments

Connected Member Vision

We help AAA Members enjoy life's journey with peace of mind by providing innovative solutions, advocacy and membership benefits wherever and whenever they need them.

Our Connected Member Vision is at the heart of all we do and together with our five values, describe who we are as an organization:

Serve Our Members

- We make members our highest priority and strive to create legendary experiences with every interaction.
- We create exceptional member value by continuously looking for new and better ways to enhance our members' lives.
- We go above and beyond to earn our members' loyalty by building meaningful life-long relationships to become their most trusted advisors.

Do What's Right

- We are open, honest, ethical and empowered to do what's right for our members and employees.
- We advocate and take action on issues that affect our community.
- We are personally accountable for delivering on our commitments.
- We safeguard our assets and protect confidential information.

Lead in Everything We Do

- We strive for excellence in all we do by offering best-in-class products, benefits and services to our members.

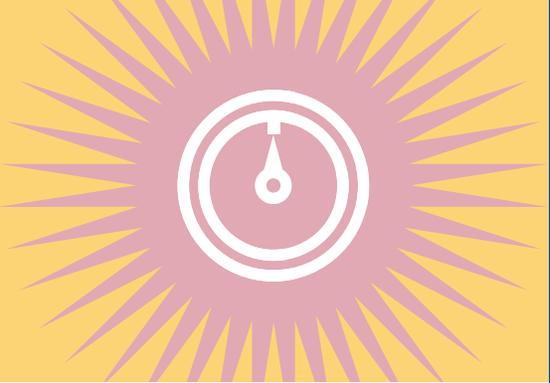
- We embrace change and innovation, acting swiftly with courage and imagination.
- We are dedicated to growing profitably and delivering outstanding results.
- We are better today than yesterday.
- We collaborate across the Federation to strengthen and protect the AAA brand.

Value Employees

- We deeply respect and appreciate our employees and value their perspectives.
- We invest in our employees and offer opportunities for personal growth and professional development.
- We reward and recognize high performance and celebrate our successes.

We Are One ACG

- We create an inclusive and welcoming environment of diverse backgrounds, experiences and viewpoints, realizing our differences make us stronger.
- We respect each other and feel safe to bring our full, authentic selves to work.
- We think, work and present ourselves as one team dedicated to helping our members and each other.
- We are motivated by our common mission to serve members and are passionate about the work we do.



Our Values Confirm Our Commitments

CONNECTED MEMBER VISION

OUR VALUES

- SERVE OUR MEMBERS
- WE ARE ONEACG
- LEAD IN EVERYTHING WE DO
- DO WHAT'S RIGHT
- VALUE EMPLOYEES

We help AAA Members enjoy life's journey with peace of mind by providing innovative solutions, advocacy and membership benefits wherever and whenever they need them.



STRATEGIC INITIATIVES

- GROW MEMBERSHIP
- TRANSFORM DIGITALLY
- OPTIMIZE INSURANCE
- DIVERSITY, EQUITY & INCLUSION



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Our Commitment Road Map

Establishing Behavioral Expectations.

What You Should Know...

ACG maintains a number of avenues through which both management and employees can ask questions or make reports of actual or suspected misconduct. In addition to discussing with leadership, members of Internal Audit or Regulatory Compliance, there are specific reporting avenues available as listed below:

- [Human Resources](#)
- **Fraud and Ethics Reporting Line:**
877-835-5222 (TELL AAA)
Accepts anonymous reports
- **Email to [Special Investigations Unit](#)**
In addition to this Code, ACG maintains several **Corporate Policies** that govern standards expected of all employees.

Our Code as a Road Map

Our Code helps us navigate difficult decisions, but it does not constitute an employment contract. Together with corporate policies and values, our Code drives the decision-making process to help us arrive at an equitable conclusion.

Who Our Code Covers

Our Code pertains to all personnel employed by The Auto Club Group of companies (ACG), including its subsidiaries, affiliates and joint ventures at any location where they perform work on behalf of ACG.

Our Responsibilities

Employees covered by this Code are required to conduct themselves in a professional, honest, lawful, and ethical manner at all times. Employees are prohibited from making maliciously false statements. If you have a question regarding any section of this Code, contact your manager, your Human Resources representative or Compliance & Ethics Services.

Those holding leadership roles have a responsibility to promote integrity in the workplace, establish a supportive atmosphere of communication and to report and/or escalate any reports of Code violations or ethical issues to upper management, Special Investigations, Human Resources, Internal Audit or Regulatory Compliance.

See the Ethics Resources page on The Hub for additional information.



Our Commitment to Consumers

Operating with trust and transparency.

What You Should Know ...

When it comes to assessing the potential for conflicts of interest, we must know how to define our relationships and interests.

For the purposes of this Code:

- “Family members” include your spouse, child, sibling, parent, grandchild, grandparent, uncle, aunt, nephew, niece or cousin (including step, half and in-law). Dependent relatives and/or any other persons living in your household can also be considered family members.
- An “outside business organization” includes any person, partnership, firm, corporation, community-based organization or other entity that supplies/ transacts or seeks to supply/transact any goods, services or business with ACG resulting in payment and/or reimbursement to or from ACG.
- “Direct or indirect ownership” includes any ownership interest in an outside business organization, even if the ownership interest is held by an intermediary acting on behalf of you and/or your family members. Ownership of a nominal amount of stock (less than 1%) in a publicly owned company is not considered a conflict unless the amount is large enough to influence your judgment.

Maintaining Appropriate Licensure

Some positions within ACG require that an employee maintain a professional license. If you are in such a position, you are responsible for maintaining the license in compliance with federal and/or state licensing regulations.

Avoiding Conflicts of Interest

The best interests of ACG should be the focal point of your work. You are to avoid situations in which your private interests, those of your family members, or those of individuals with whom you have or have had a close personal relationship, conflict with the best interests of ACG. A conflict of interest exists where an employee’s loyalties or actions are divided between the company’s interest and those of another, such as a competitor, supplier, or client. While having a conflict of interest is not always a violation of this Code, not disclosing one is. To maintain an impartial view, all ACG employees must be free from the influence of personal considerations or relationships when working for or giving business recommendations to ACG.

The following are situations where a conflict of interest may arise:

- Obtaining personal services from known ACG vendors, especially when employed in a position that has frequent contact with ACG vendors.
- Owning, either directly or indirectly, any outside business organization as per the definition provided in the “What You Should Know...” sidebar section of this page, or any business that competes with ACG.
- Serving as an officer, director, partner, consultant, employee or agent of any outside business organization as per the definition provided in the “What You Should Know...” sidebar section of this page.
- Engaging in any outside employment, possessing a financial interest or having ownership involvement with a nonaffiliated insurance or travel agency, bank or any other business that competes with ACG.
- Accepting anything of value that is intended – or could be construed – to influence a business decision. Examples include gifts, favors, discounts, incentives, compensation, commissions, fees, travel or lodging accommodations, or other goods or services from any outside business organization (refer to the ACG Gift Policy).
- Hiring or supervising family members or others with whom you have a close personal relationship.
- Having a personal interest, financial interest or potential gain in any transaction involving ACG.
- Conducting ACG business with a firm owned or controlled by an employee of ACG or a family member of an ACG employee.

What You Should Know ...

Appropriate business courtesies include nominal gifts (items valued at \$100 or less per employee), sharing a meal or attending a sporting or entertainment event with a business partner.

Inappropriate gifts from business partners include, but are not limited to, cash or cash equivalents, such as digital or electronic checks and gift cards. As employees, we must neither give nor accept business courtesies that actually or potentially constitute unfair business inducements, bribes, or kickbacks. More often than not, these actions violate the laws, regulations, and policies to which ACG is bound.

If you are unsure about what constitutes an appropriate gift, please review the ACG Gift Policy in advance and contact your manager or Compliance & Ethics Services for guidance.

- Borrowing money from any outside business organization, except loans or advances from banks or other financial institutions offered at prevailing commercial rates and lending standards.
- Making unapproved brokering or paid business referrals to any outside insurance agent, broker, or firm which provides or procures insurance of any type that is available through or from ACG or any of its subsidiaries or affiliated companies.
- Soliciting business courtesies, special consideration in the settlement of claims, the underwriting process or the premium collection process.
- Obtaining company salvage property, unless the purchase is conducted through an ACG-sponsored program, or otherwise approved in advance.
- Providing false information when conducting business with ACG.
- Paying for business referrals outside of approved ACG programs.

As an ACG employee, you are required to report potential conflicts at least annually, and more frequently as warranted, to your manager by completing an ACG Conflict of Interest disclosure/certification. Compliance & Ethics Services receives a tracking report of submitted and approved Conflict of Interest disclosures.

Keep in mind that you may not engage in activities with any outside business organization that may result in a personal benefit to you or a family member at ACG's expense. This includes taking advantage of a potential business opportunity that ACG may wish to participate in without first disclosing that opportunity to ACG and allowing ACG ample time to consider whether to pursue it. Likewise, you may not engage in activities or interests that may influence your decisions on matters involving ACG and the outside business organization in question.

Avoiding Inappropriate Business Courtesies

ACG is committed to competing solely on the merit of the products and services we provide our customers - not the quality of the courtesies we receive from our business partners. As such, we should avoid accepting any courtesy that might call our objective decision-making into question or give the appearance that we have solicited or received certain courtesies in exchange for personal gain.

For more information about this policy and the related reporting requirements for accepting a gift, please review the ACG Gift Policy. Refer to the ACG Corporate Ticket Policy for guidelines regarding the purchase and use of event tickets.

What You Should Know ...

A “government official” includes any government representative or employee, including those from government-owned enterprises.

An “export” occurs when a product, service, technology, or piece of information is provided to a person or company in another country.

What Should You Do?

A longtime member came into the branch to reload \$4,950 on each of his two prepaid cards via cash. When asked if he was planning to travel, he became visibly uncomfortable. Recalling that the total cash transaction amount was very close to the Currency Transaction Report (CTR) mandate of >\$10,000, do I need to report this activity to Field Controls?

Yes, you must report this activity. The reason behind this reporting is to allow Field Controls to evaluate whether to file a Suspicious Activity Report (SAR) pursuant to the Bank Secrecy Act (BSA) for the customer intentionally structuring a purchase below the CTR threshold.

Explaining Anti-Corruption Guidelines

ACG’s commitment to integrity includes being compliant with the laws, rules and regulations applicable to any of our business operations. Such laws may vary from place to place, and we must know and abide by the requirements in all places where we conduct our business.

Government Corruption

The U.S. Foreign Corrupt Practices Act (FCPA) prohibits giving anything of value, such as a payment, gift or bribe, to obtain the influence of government officials, candidates or political parties, even if doing so is customary in a particular place. ACG prohibits “facilitating payments” or fees paid to government officials to speed up routine processes such as the issuance of permits. You must report and document requests for money or anything of value initiated by a government official. Additionally, if payments or anything of value are provided in response to such a request, even if unintentionally, proper reporting and documentation is required by law. ACG maintains uniform processes for the reporting and tracking of legal lobbying activities.

Commercial Kickbacks and Bribery

ACG does not pay bribes, nor will we ever offer or accept a “kickback.” This means that no individual employed by or engaged to provide services to ACG can return or accept the return of a sum already paid (or due to be paid) as a reward for making or fostering business arrangements. ACG also prohibits offering or soliciting improper payments or anything of value in connection with any purchase or sale of products or services to retain or obtain business.

Adhering to International Trade Controls

While ACG does not manufacture consumer goods or export physical items to other countries, it is still important that we have a basic understanding of export controls for those instances in which they apply to us. For example, there may be times when work duties require international travel. In these situations, voluntary disclosure of confidential business information in some context could be considered an export and potentially result in a penalty or fine to ACG. If you have any questions regarding international trade controls, contact Regulatory Compliance or the Office of General Counsel.

Preventing Money Laundering and Terrorist Financing

ACG’s Anti-Money Laundering (AML) program helps prevent ACG’s products and services from being used for money laundering purposes, illegal financial transactions or other criminal activity. You are required to comply with all applicable and relevant anti-money laundering laws and should only do business with individuals or companies that are engaged in legitimate and lawful business. If you notice any suspicious activity or red flags pertaining to a third party, report the situation to your manager. For more information, refer to the Bank Secrecy Act/Anti-Money Laundering & Office of Foreign Assets Control Policy.

What You Should Know ...

- All employees must protect confidential trade secret information and/or confidential proprietary information as further defined under the Safeguarding Confidential, Sensitive and Proprietary Information section on this page.
- Confidential and trade secret information and/or confidential proprietary information cannot be disclosed without a valid business purpose and management approval.

What Should You Do?

You are approached by a colleague for access to a customer list. At first, you think nothing of it. Though your job titles and responsibilities differ, you are both part of the same team and have worked together for months. While you are retrieving this information, your colleague casually mentions their sibling is trying to establish a new business. You worry that they may be using this information for personal gain. What should you do?

This situation might seem awkward until you remember that you are not allowed to share confidential information without prior authorization to do so. This is true even if the person asking you for such information is a trusted colleague. Consult with a manager to determine whether your colleague's request is appropriate prior to sharing the information.

Protecting Company Assets

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

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

You have a responsibility to use ACG assets only for authorized business purposes. You may make occasional, personal use of ACG equipment if the use does not interfere with your work or the work of others. Direct questions about the proper use of ACG resources to your manager. If your manager is not immediately available, refer to any of the resources listed on page 1 of this document.

You may not retain any ACG-owned equipment, documents or copies of business records (paper, electronic, or digital) including, but not limited to, business or strategic plans or customer records which are in your possession once your employment with ACG ends. For more information, refer to the ACG Employment Policy Guide.

Safeguarding Confidential, Sensitive and Proprietary Information

Confidential, sensitive and proprietary information about our customers and company (including customer lists and records, customer contact and financial information, customer contract terms, business preferences and historical transaction data and information, information of licensors, suppliers, vendors, prospective licensors or customers, non-public records and data and information regarding the Company's existing and future business plans and proposals, pricing, licensing, strategies, advertising campaigns, and information regarding innovations, business sale and acquisition opportunities and product performance research and analysis, internal business reports, and company business strategy annotations) is one of the most important assets in our possession - and protecting such information is integral to our business success. In the event of a subpoena or other legal process requiring the organization to disclose customer information, specific procedures must be followed. Consult with the Office of General Counsel prior to disclosing any customer information in these circumstances. For more information, refer to the ACG Safeguarding Confidential & Sensitive Documents Policy.

What You Should Know ...

- A business record is any data-containing item (paper, electronic or digital) regarding a company's activities.
- Intellectual property (IP) is any original creative work manifested in a tangible form that can be legally protected by a patent, trademark or copyright.
- Information that is not public and could be viewed as important by a reasonable investor in deciding to buy, sell or trade stock is considered inside information and cannot be used for personal gain.

What Should You Do?

I just started working at ACG – I came here from one of our competitors. I often get questions from coworkers who want to know the long-term business strategies of my former employer. Should I share such information with my current coworkers? It could benefit ACG, and I have no sense of loyalty to my previous employer.

No. You should not bring confidential proprietary information from a former employer to the company. Revealing confidential information or trade secrets of a former employer is not only unethical – it may also violate the law. Any benefit that ACG might derive from this knowledge would not be worth the long-term consequences. Anyone who asks for this information should be told that it is not up for discussion. If you need help handling these kinds of questions, talk to your manager or contact Regulatory Compliance.

Record Retention and Disposal

ACG is the sole owner of its business records. ACG information may only be retained and destroyed in accordance with the ACG Record Retention and Disposal Policy.

Protecting Intellectual Property

The same rules that apply to confidential and proprietary information also apply to intellectual property (IP). It is important to protect ACG's IP as well as that of third parties. You may not use any third party IP without the proper licenses or permissions, and you must take special care to follow all applicable terms closely. However, you may access and use information shared with the public, which can include media releases and presentations. It is important to note that even though we may have received permission to use proprietary information or intellectual property belonging to another for a particular purpose, we must be sure to respect related trademarks and copyrighted material and only use such IP when given express and specific permission to do so. This includes information that may be available on websites and through software.

Preventing Insider Trading of Vendor Securities

ACG employees often have access to data considered material, nonpublic or inside information. Since ACG is privately held, there is no investment-related inside information that relates specifically to ACG (though our confidential information must be protected regardless). However, other companies with which we work and interact are publicly traded, and it is possible for you to learn material, nonpublic information about them. You must not trade or instruct others to trade a company's stock based on inside information. Inside information can come in a variety of forms and be positive or negative in nature. Examples include but are not limited to:

- Projections of future earnings or losses.
- News of a pending/proposed merger or joint venture.
- New product launch or innovative tool.
- News of a significant sale of assets.
- Changes in executive management.

Insider trading is illegal and can carry serious consequences for ACG and individuals involved. If you have any doubts as to whether information you possess is considered inside information, seek guidance from Regulatory Compliance.

What You Should Know ...

When it comes to determining account access that could give the potential appearance of wrongdoing, we must know how to define our relationships and interests.

For the purposes of this Code, ACG defines “close personal relationship” as a favorable relationship between an employee and another individual that can influence or has the appearance of potentially influencing the employee’s judgment or behavior. For instance, it is improper for an employee to process payments to ACG made by an employee’s spouse or immediate family member due to the appearance of a possibility that an employee may charge less than the required amount or process an unwarranted discount. Other examples of close personal relationships include extended family members, personal friends or business partners.

Restricting Access to Personal Accounts

Generally, aside from company records that you review as part of your regular job duties, you may not access any ACG records other than those containing public information or information you have disclosed to ACG. You may use online consumer self-service capabilities to transact on existing personal policies, accounts or loans you have with ACG. Within internal employee facing systems, another authorized employee should handle your personal accounts as well as those of individuals with whom you have a close personal relationship. Additional system-specific restrictions and exceptions are referenced below:

Claims Systems: Access or review of employee claims is limited to people assigned to the claim and their management.

Insurance Systems: You are required to direct payment processing or changes involving personal, family member or close personal relationship accounts to another employee in either the field or call center.

Membership Systems: Another employee must process any transactions or maintenance for your membership account or accounts of those with whom you may have a close personal relationship. Payment or maintenance transactions include opening a new membership; adding an associate; upgrading or changing membership levels; giving a gift membership; enrolling a referred member; printing membership cards; editing account information such as billing or contact information; or adding notes or comments to a membership.

Payment Systems: Do not process payments regardless of type (cash, check or credit card).

Travel Systems: You are required to direct payment processing or changes involving personal, family member or close personal relationship accounts to another employee in either the field or call center.

Banking Systems: Do not perform account maintenance or transactions. Transactions include not only authorizing and making loans, but also such things as approval of overdrafts; authorizing or accepting checks on uncollected funds; waiving of late charges, overdraft charges, or other nominal fees; processing deposits or withdrawals; and waiving of financial statements or collateral documents.

Using Technology Appropriately

In order to protect our interests, ACG reserves the right to monitor or review all data and information contained within any ACG-owned, operated or issued electronic system, computer or electronic device (regardless of location of equipment). This includes, but is not limited to, all written electronic communications drafted within or sent to any ACG system, including email, instant messaging or via the Internet. Use of company resources to create, access, store, print, solicit or send any materials that are harassing, physically threatening or sexually explicit is a violation of our Code and may lead to disciplinary action.

Please ensure that all written statements or recorded verbal communications on work-related matters are objective, accurate and professional in tone. For more information, please refer to the Information Security Policy.



Our Commitment to Consumers (continued)

What Should You Do?

One of ACG's vendors had a cybersecurity incident that potentially involved ACG member and employee data.

The news about the vendor incident has been published in the media. The employee receives a telephone call from a reporter seeking comment on another organization's claims about the security incident and/or that ACG's systems were used to conduct malicious or suspicious activity.

The employee should never communicate any internal security incident information they may have with anyone internal or external to ACG, as per the confidentiality requirements cited within the Code of Conduct.

ACG personnel must report known or suspected security incidents to cybersecurity@Acg.AAA.com immediately upon discovery. For additional details, refer to the ACG Cyber Security Incident Response Plan, Section 2.

Data Security

Employees, members, customers and business partners often trust ACG with their personal information. We have a responsibility to protect this information and ensure sharing, processing, collection, storage and transmittal in accordance with ACG policy. Passwords and security codes protect the integrity of confidential information and are unique to an individual. They are not to be shared, transferred or disclosed to anyone absent explicit written management authorization.

ACG also strictly adheres to the Data Security Standards, including those issued by the Payment Card Industry (PCI), which individuals who handle confidential and sensitive data must know and follow. When questions, issues or concerns about data security arise, consult your manager for guidance. Should you become aware of a data security incident occurrence, you must promptly notify Enterprise Information Security.

For more information, please refer to the Security Policy for Data Protection and Privacy.

Mobile Devices

For specifics regarding proper usage and data protection of confidential information contained within mobile devices, refer to the Acceptable Use Policy – Mobile Devices.

What Should You Do?

You are striving to hit your sales goals for the quarter, but business has been slow. You are worried that you will not meet your quota and are getting frustrated.

During a conversation with a prospective customer, you learn about a new product offered by one of our competitors that has a much lower rate. It seems like this is one possible cause for your decline in new business. The prospective customer asks you if you have anything that could compare to this competitor's offer, and you are not sure. What should you do?

Be honest with the customer. Explain that you aren't sure but will check into the situation with the appropriate individuals, including your management. In the interim, perform a quote following the normal process. Although we strive to be competitive, we must act ethically in every circumstance. It is important that we do not do anything to violate the rules that have been established, even if it means we do not close a sale. We value the long-term reputation of ACG and never want to compromise that reputation to meet short-term financial goals.

Complying with Antitrust Laws

ACG complies fully with antitrust laws, which are designed to preserve competition and ensure a level playing field across our industry. To this end, we sell our products and services based on merit, quality, functionality, and competitive pricing – never by disparaging our competitors.

ACG will not enter into any formal or informal prohibited agreements with our competitors. As such, within the scope of employment at ACG, never engage in or discuss topics or practices that restrict competition, including:

- Price Fixing.
- Bid Rigging.
- Division or Allocation of Markets, Territories, or Customers.
- Improperly Tying or Bundling Products and Services.
- Boycotting Certain Vendors or Customers.

If an employee from a competing company attempts to discuss these or any other anti-competitive topics with you, end the conversation immediately and report the interaction to your manager. If your manager is not immediately available, refer to any of the resources listed on page 1 of this document. It is equally important that you do not acquire or seek to acquire a competitor's trade secrets or other proprietary or confidential information through unlawful means. When seeking a competitive advantage, use only publicly available information that you obtain lawfully and ethically.

Providing Quality Customer Service

Our members and customers trust us to provide quality products and services. Similarly, our partners provide goods and services that contribute to our success. To continue to earn the trust and respect of those with whom we conduct business, we must always conduct ourselves honestly and ethically. This means that we are clear about the risks, costs and conditions related to our services. Providing fair and accurate disclosure of critical terms to our members and policyholders is not only the right thing to do, but it also demonstrates compliance with federal and state laws prohibiting unfair, deceptive and abusive acts and practices.

Ensuring Financial Integrity

At ACG we have a responsibility to maintain accurate and reliable financial records. Employees, officers and directors must comply with ACG's financial policies and procedures, which are established for safeguarding assets and ensuring proper financial reporting. The underlying transactions must be properly authorized and accurately recorded in a timely manner to facilitate the preparation of financial statements in accordance with applicable accounting principles. It is improper to falsify ACG's books, records and member or policyholder accounts. By demonstrating financial integrity, we maintain the trust of our stakeholders and comply with regulatory requirements.

What Should You Do?

My travel expense account is under budget for the year, but training expenses have been more than expected. I have a new hire that needs training. Can I expense the new hire's training under the travel account so I don't show a budget variance?

It is everyone's professional responsibility to provide accurate financial information. You may not misrepresent or intentionally miscode expenses to avoid budget variances within your department's accounts. The new hire's training expenses should be recorded in the training expense account, which may result in an explainable budget variance while still allowing you to manage your department's overall budget. Accounts and budgets are established at necessary levels to allow us to effectively manage all parts of the organization. The ability to identify and explain budget variances at such levels is critical for decision making and relies upon accurate financial reporting. In addition, some expenses require different income tax treatment and if they are not properly recorded in the accounting system, our tax filings could be inaccurate.

What You Should Know...

Reporting Mechanisms:

- [Human Resources](#)
- [Fraud and Ethics Reporting Line:](#)
877-835-5222 (TELL AAA)
Accepts anonymous reports.
- [Email to Special Investigations Unit](#)

Preventing, Detecting and Reporting Misconduct

You must not commit, aid, or assist in committing fraud, misrepresentation, theft, embezzlement or any similar activity. This includes fraud with a perceived benefit to ACG. All ACG employees are responsible for preventing and detecting misconduct including, but not limited to:

- Forgery or alteration of any documents, or unauthorized approval of documents (printed or electronic), such as insurance policies and related items, checks, securities or other items.
- Inaccurate or overstatement of expenses within Travel and Entertainment reporting.
- Misuse or misappropriation of corporate funds, securities or any other assets, including "borrowing" funds from cash drawers, vaults, funds awaiting deposit or other deposit accounts.
- Improper handling or reporting of money or financial transactions.
- Improper handling of ACG property, assets or information, including misuse of member or customer personal and confidential information.
- Unauthorized disclosure of ACG business plans or financial information.
- Destruction or unauthorized removal of corporate assets.
- Creation of fictitious accounts.
- Failure to properly record time worked by overstating, understating or misreporting actual hours worked.

If you suspect or have information concerning any such wrongdoing, you have a duty to immediately notify your manager or another resource listed in the "What You Should Know. . ." sidebar section of this page. This applies to any illegal or unethical practice involving ACG, fellow employees, members, customers, contractors or anyone doing business with ACG.

Never take it upon yourself to perform any investigation of suspected wrongdoing. Doing so can compromise the integrity of the investigation. Refer to Reporting Violations on page 16 of this Code for further details.

Safeguarding Vulnerable Groups

ACG respects the human rights and dignity of all people throughout our organization, including consumers and suppliers within the communities in which we live and do business. We comply with all laws that prohibit forced labor and employment of underage children, as well as those that prohibit human trafficking.

To help protect those individuals who may be more vulnerable, such as the elderly, those with disabilities and adults dependent upon caregivers, we must all:

- Remain vigilant in observing situations where a person demonstrates warning signs, as outlined in the BSA AML OFAC - Suspicious Activity Monitoring and Reporting Procedure; and
- Report suspected abuse to your manager or another resource listed in the "What You Should Know. . ." sidebar section of this page.



Our Commitment to Community

We are socially responsible in our communities.

What You Should Know ...

We will be good corporate neighbors, engaging in public service consistent with our mission, the needs of members, the communities we serve, and the national interest. In pursuing public policy positions, ACG will remain objective and responsible, relying on our credibility, expertise, and research in public policy formulation.

What Should You Do?

I frequent a number of blogs and websites that focus on business and consumers. Recently, a popular site posted an article criticizing the business practices of a few major organizations, including ACG. I noticed that the information presented about ACG is inaccurate and readers are using this information to write disparaging comments. Should I go online and provide the correct information?

No. ACG employees must not disclose company-specific information to anyone without a specific and legitimate business need. You should always be cautious about discussing corporate issues with anyone outside of ACG. You can refer any inquiries or concerns about ACG to a representative of the ACG Public Affairs Department.

Interacting with the News Media

There may be times when ACG employees individually opt or are prompted by members of the news media, to discuss information relative to ACG. It is important to understand that you are not authorized to speak on behalf of the company. Never represent yourself as a spokesperson for the company. ONLY designated spokespersons are permitted to act as “ACG representatives” to ensure that ACG speaks with one voice and provides accurate and consistent information about our operations.

You should not speak to the media on the company’s behalf but should instead direct all media inquiries seeking a response on behalf of the Company to the ACG Public Affairs Department. Likewise, no one can make public appearances, speeches, or issue press releases as a representative of ACG without first disclosing the content and obtaining written approval from their management and the ACG Public Affairs Department.

Requests to use ACG facilities in media reports should also be referred to the ACG Public Affairs Department. Please refer to the Media Relations Policy for more information

Social Media

When making personal use of social media, it is important NOT to represent your individual opinions and ideas as those of ACG, unless doing so is part of your role at ACG. If you choose to mention ACG in a personal social media post, disclose your status as an employee. When representing ACG, do not reveal any of ACG’s confidential or proprietary information, trade secrets, or intellectual property. ACG’s confidential proprietary information and trade secrets are further defined under the Safeguarding Confidential, Sensitive and Proprietary Information section on page 5. This standard also applies to the confidential and sensitive information of our members or our business partners. For more information, including guidelines that apply to the way you may reference ACG on social media, please refer to the ACG Social Media Policy.

What Should You Do?

You are asked by a vendor to provide input on an article they are writing for a trade publication. The intent is to use your comments as a quote in the article.

Do you need to get approval from the Public Affairs team?

Yes. Contact your management and together engage your assigned Regional Public Affairs representative who will manage the inquiry.

What Should You Know ...

“Games of chance” such as gambling, lotteries or bingo are illegal and thus prohibited.

Additionally, it is unacceptable to conduct silent or live auctions. Refer to the [ACG Corporate Fundraising Policy](#) or contact the Director of Corporate Contributions & Community Relations for additional guidance.

Being Socially Responsible

One of ACG’s core values is that “we advocate on issues that affect our communities, members and employees.” As such, numerous significant community and civic causes and organizations are recipients of ACG philanthropic contributions.

Community Involvement

ACG employees are encouraged to be active participants in the growth and enrichment of our local communities. This is done through volunteer efforts, either on behalf of ACG or in a personal capacity. However, in the interest of maintaining a proper and productive business environment, you may only work for a cause that aligns to our Corporate Fundraising Policy and ACG’s Values when volunteering on ACG’s behalf or using Volunteer Paid Time Off (PTO). You must not use paid company time or company resources to further your endeavors nor solicit or distribute literature or other materials of any kind during Work Time. Work Time is the time employees are expected to be working and does not include breaks, meals, and other periods in which employees are not on duty. ACG is also committed to the Community Reinvestment Act (CRA), employing safe and sound operations to help meet the credit needs of the communities it serves.

Civic and Charitable Organization Involvement

ACG encourages employees to become active members of civic and charitable not-for-profit organizations, except when doing so would create a conflict of interest for the employee and/or ACG. Contact ACG’s [Compliance & Ethics Services](#) for additional guidance.

Charitable Contributions/Fundraising

The ACG Public Affairs Department has ultimate oversight of ACG charitable contributions and will coordinate corporate or employee participation in any ACG-sponsored charity. You may participate in small-scale fundraising amongst ACG colleagues and friends, but activities should be limited to your department or work area. Opportunities for employee charitable giving are coordinated through the Office of Sustainability, mainly through participation in ACG’s annual Giving Campaign. These opportunities must align to our Corporate Fundraising Policy. For additional guidance on fundraising, please refer to the ACG Corporate Fundraising Policy. For information on charitable contributions, contact the Director of Corporate Contributions & Community Relations.

What Should You Do?

If you have questions about what constitutes appropriate political or charitable involvement while working for ACG, contact the Government Relations Office.

For other questions related to sustainable practices at ACG, please visit [The Office of Sustainability](#) site or contact them directly.

Political Involvement

The same rules that ACG places on charitable contributions and volunteerism also apply to personal political involvement. While ACG may, at times, choose to support a particular cause or candidate for office, it is important that the personal political endeavors of employees remain separate. Therefore, you may not make contributions of time or funds on ACG's behalf when performing work for a non-sanctioned cause, party or candidate. You may not use ACG's name, any ACG resources (letterhead, email accounts, employee time, etc.) or otherwise convey or suggest that your personal political activities are supported by ACG.

ACG maintains a political action committee (ACPAC) and employee participation is voluntary. For more information, refer to the ACPAC site.

Environmental Protection

ACG is committed to making sustainability a core business principle throughout the footprint and reducing our environmental impact. The Connected Member Vision and ACG Values guide us to advocate for sustainability, always treat people with dignity and respect, and lead with best practices.

As part of this commitment, ACG employees must follow all applicable health, safety, and environmental laws and regulations. For more information on these protocols, please refer to Real Estate Services' Environmental and Sustainability Policy.



Our Commitment to Fellow Employees

We embrace diversity, equity and inclusion. We stand committed to promoting a culturally inclusive environment that energetically connects our vibrant workforce, our members and the communities we serve.

What Should You Do?

You receive a call from a prospective insured who informs you that she wants to have an assigned agent handle her insurance matters, but only if the assigned agent is male. What should you do?

As an equal opportunity employer, the company must treat all employees alike and cannot favor individuals of one gender over another. The company cannot grant or accommodate requests of existing or prospective customers that are or appear to be discriminatory.

You should immediately contact your manager or Human Resources for guidance on addressing the prospective insured's request.

Embracing Diversity, Equity & Inclusion

ACG is committed to the growth of diversity, equity and inclusion with our employees, our members and the communities we serve. In an effort to build on our mission to promote workforce diversity, equity and inclusion, we aim to cultivate a workplace culture where employees' unique talents and perspectives are valued. At ACG, diversity, equity and inclusion are integral parts of our connected member vision strategy, our vision and corporate goals. For more information, please visit the Office of Diversity, Equity & Inclusion Hub site or contact a member of the Office of Diversity, Equity, & Inclusion organization.

Exercising Anti-Discrimination and Equal Opportunity

We are a company committed to creating a work environment where all individuals are treated in a manner in accordance with this Code. To combat unlawful discrimination, it is important that ACG make employment decisions on the basis of individual merit – never on characteristics protected by law. ACG prohibits discrimination, harassment and retaliation in employment based on race, color, religion, sex (including pregnancy, sexual orientation or gender identity), national origin, marital status, sexual orientation or preference; pregnancy, childbirth or related medical conditions; age (40 or older), disability and genetic information (including family medical history); or any other category protected by federal, state or local law. If you witness or experience an act of discrimination, you should report the incident to your manager or Human Resources immediately.

Preventing & Addressing Harassment

ACG is committed to creating a work environment free of harassment. Questions about what constitutes harassing behavior or what conduct is prohibited by this Code should be directed to management. At a minimum, the term “harassment” includes:

- Offensive remarks, comments, jokes, slurs or other offensive verbal conduct directed toward an individual that directly or indirectly references a protected characteristic, such as those referenced in the section above.
- Offensive pictures, drawings, photographs, or other graphic images, conduct or communications, including email, faxes and text messages pertaining to an individual's legally protected characteristic.
- Offensive and/or unwelcome sexual remarks, sexual advances or requests for sexual favors.
- Offensive physical conduct, including touching and gestures.

What Should You Do?

You have recently transferred to a new department. You are eager to fit in and develop strong working relationships with the group. However, you notice two of your new team members continuously make fun of another member while on video calls, often saying very cruel things and passing them off as jokes. The colleague at the brunt of the jokes laughs along half-heartedly, but you notice he is clearly uncomfortable. Often times, the nasty remarks involve his age and are occasionally related to his ethnicity. On one hand, you want to speak out in his defense; on the other, you don't want to alienate the team and believe he would defend himself if truly bothered. What should you do?

We all want to get along with coworkers. However, we cannot be a functional, high-performing team when one member is treated unfairly. What you are witnessing may be harassment or bullying, and you have a duty to inform your new manager, Human Resources, or the Fraud & Ethics Reporting Line of the situation. No one should be subjected to words and actions from a colleague that are in violation of this Code. Regardless of the outcome of an investigation, you will not be punished for reporting your concerns in good faith.

If you believe you and/or a colleague is a victim of harassment, you should report the matter immediately to your manager, Human Resources or to the Fraud & Ethics Reporting Line. If you are a manager within ACG and are aware of information about potential harassment, you must advise Human Resources immediately.

Remember, at ACG we do not tolerate retaliation for making a good faith report of actual or possible harassment. For more information, refer to the Discrimination & Harassment Policy within the ACG Employment Policy Guide.

Ensuring Workplace Safety

Health and Safety

ACG considers safe, healthful working conditions and accident prevention to be integral to our business. All employees share the responsibility of preventing accidents by following safe work procedures and practices. If you witness or suspect unsafe conditions or practices, you have a responsibility to report them. This can be done by contacting Corporate Insurance, Safety and Loss Prevention at cislp@acg.aaa.com.

Workplace Violence

Employees must not engage in or tolerate violence in the workplace. Workplace violence includes remarks or behaviors that are discriminatory, and/or physically abusive. Fighting, violence, or threats of violence in the workplace, or encouraging such conduct while conducting Company business or using Company resources and equipment, is prohibited. Also prohibited are arguments that rise to the level of violating this Code's discrimination and/or anti-harassment policies. If you feel that your safety or the safety of others is threatened at any time, or if you witness or experience any prohibited behavior (in person or online), you have a duty to report it immediately to local authorities, then report the incident to Corporate Security and/or your manager. For more information, refer to the Incident Notification & Reporting Policy.

Weapons in the Workplace

ACG believes in maintaining a safe workplace free from threats, coercion or violence of any kind. Employees, other than authorized security personnel, are not permitted to possess guns, ammunition or any other weapons in any company vehicle, office or facility.

Drug- and Alcohol-Free Workplace

Performing your job while impaired by substances puts everyone with whom you interact at risk. That is why we prohibit employees from working under the influence of alcohol or drugs - including misused prescription or over-the-counter medications. In addition, you may never possess, transfer, or sell drugs or alcohol while on ACG premises. For more information, refer to the Drug-Free Workplace Policy within the ACG Employment Policy Guide.



Our Commitment to Ensuring Corporate Integrity

What You Should Know . . .

ACG maintains a number of avenues through which both management and employees can ask questions or make reports of actual or suspected misconduct. In addition to discussing with leadership, members of Internal Audit or Regulatory Compliance, there are specific reporting avenues available as listed below:

- [Human Resources](#)
- Fraud and Ethics Reporting Line:
877-835-5222 (TELL AAA)
Accepts anonymous reports.
- Email to [Special Investigations Unit](#)

Reporting Violations

Reporting actual or potential violations of our Code, policies or the law is important to maintaining our ethical culture. When making reports of actual or suspected misconduct, you are encouraged to reach out to your manager first. If that is not possible or you are uncomfortable raising the issue with your manager, you may go through your department's normal chain of command.

Regardless of your chosen reporting venue, ACG will investigate all reports of possible Code violations or improper behavior. Members of management must refrain from performing independent investigations of employees suspected of Code violations, unless specifically requested to do so by the team(s) conducting the company's formal investigation.

In every instance where improper behavior is found to have occurred, ACG will take appropriate action. For more information, refer to the Fraud & Ethics Reporting and Investigation Policy.

Supporting Non-Retaliation

Making a report in good faith means that you have provided a truthful and complete account of your personal observation or knowledge of an incident, even if no actual misconduct is found to have occurred. ACG will not tolerate retaliation against anyone who raises concerns in good faith. Retaliatory behavior includes, but is not limited to, threatening, intimidating or taking adverse action against a person. On the other hand, anyone who purposely makes a false report will be subject to discipline. Refer to the ACG Employment Policy Guide for further information.

Responding to Audits, Exams, and Investigations

During your employment, you may be approached for records or information in connection with an audit, examination or investigation. After engaging your manager, cooperate fully and provide complete and accurate information. You must never attempt to obstruct, mislead or improperly influence an auditor, examiner or investigator. If information or records under your control are identified as relevant to an audit, exam or to a civil, criminal or regulatory proceeding, you must retain and safeguard them from destruction until otherwise notified by the person or ACG representative conducting the audit or examination.



Our Commitment to the Marketplace

What Should You Do?

I am a project manager overseeing one of our top corporate initiatives and have contracted with a technology supplier. Additionally, based on resource needs for the project, I have employed personnel through one of our employment agencies. What do I need to review with these individuals as far as the Code is concerned?

Code provisions applicable to contractors are available on AAA.com's [Integrity](#) site. Managers responsible for oversight of contractors performing services for ACG should review these standards and ensure that contractor representatives are aware of and comply with these standards.

Ensuring Third-Party Due Diligence

If your work involves selecting or managing third party relationships, you should practice due diligence as outlined in the Operational Supplier Risk Management (SRM) Policy and be familiar with criteria ACG uses when selecting a supplier as outlined on AAA.com's [Doing Business With AAA](#) site. Additionally, prior to engaging in exploratory discussions with a third-party to secure products or services, even those consultative in nature, employees must:

- Obtain prior management approval after providing your manager with supporting details.
- Engage the Office of General Counsel or Regulatory Compliance if potential litigation or compliance concerns may be involved.
- Obtain signed non-disclosure agreements from the third-party, as necessary.

Further, we must not retain a third party to engage in any activity that we are prohibited from participating in ourselves.

Understanding Contractual Relationships

ACG partners with many suppliers, consultants and contractors who provide ACG products and services, either exclusively or non-exclusively, in the course of doing business. Although they are not employees of ACG, these individuals are expected to share ACG's commitment to creating and maintaining an ethical work environment.

Referencing the ACG Code of Conduct for Suppliers, Consultants and Contractors

For more specific information regarding third-party behavioral expectations, refer to the Code of Conduct for Suppliers, Consultants and Contractors.



Our Commitment to Personal Accountability

What You Should Know . . .

ACG has a solid reputation for quality service and ethical behavior which can only be maintained through consistent professionalism.

Our employees are expected to perform their duties with honesty, integrity, good judgment, dependability, accountability and punctuality.

At all times, including off-work hours, we expect employees to be respectful in all interactions with coworkers, business partners, members, customers, vendors and the communities we serve, both when communicating in person and online. Offensive conduct will not be tolerated. Please refer to the [Employment Policy Guide](#) for additional details.

ACG Code of Conduct & Corporate Policies Acknowledgment

ACG is committed to legal and ethical business conduct and relies upon every employee to ensure this commitment is met. While this Code provides the framework for ethical standards, ACG Corporate Policies (which is fully incorporated into the ACG Code of Conduct by reference herein) detail additional responsibilities and requirements that all ACG employees must follow.

All ACG employees are required to certify compliance with the ACG Code of Conduct and the ACG Corporate Policies and complete the related training.

I acknowledge that I have reviewed and understand the ACG Code of Conduct and ACG Corporate Policies. As such, I understand this Acknowledgment is not intended to be a contract of employment. I also understand that failure to comply with the expectations set forth in the ACG Code of Conduct and ACG Corporate Policies will result in disciplinary action, which can include termination of employment.*

I understand that nothing in this or any other policy shall be interpreted or applied to prohibit non-supervisory employees from engaging in lawful activities for mutual aid or protection including, but not limited to, discussing wages or other terms and conditions of employment amongst themselves or third parties.

* ACG IS AN AT-WILL EMPLOYER. THIS MEANS THAT REGARDLESS OF ANY PROVISION IN THIS ACG CODE OF CONDUCT, THE ACG CORPORATE POLICIES, OR IN ANY DOCUMENT OR STATEMENT, WRITTEN OR ORAL, EITHER YOU OR ACG MAY TERMINATE THE EMPLOYMENT RELATIONSHIP AT ANY TIME, FOR ANY REASON, WITH OR WITHOUT CAUSE OR NOTICE. NO OFFICER, EMPLOYEE, OR REPRESENTATIVE OF ACG IS AUTHORIZED TO ENTER INTO AN AGREEMENT - EXPRESS OR IMPLIED - WITH ANY EMPLOYEE FOR EMPLOYMENT OTHER THAN AT-WILL (UNLESS THOSE AGREEMENTS ARE IN A WRITTEN CONTRACT SIGNED BY THE CEO). THIS CODE OF CONDUCT IS NOT A CONTRACT.



Helpful Resources

Report actual or suspected misconduct to:

ACG maintains a number of avenues through which both management and employees can ask questions or make reports of actual or suspected misconduct. In addition to discussing with leadership, members of Internal Audit or Regulatory Compliance, there are specific reporting avenues available as listed below:

- [Human Resources](#)
- Fraud and Ethics Reporting Line:
877-835-5222 (TELL AAA)
Accepts anonymous reports.
- Email to [Special Investigations Unit](#)

Report threats, threatening behavior or emergencies to Corporate Security:

- Dearborn: 313-336-1777
- All Other Locations: 855-645-4686
- Email to [Corporate Security Operations Center](#)

Report unsafe conditions or practices to Corporate Insurance, Safety and Loss Prevention:

- Email to [Corporate Insurance, Safety and Loss Prevention](#)

Policy Listing

Below is a list of detailed policies referenced in the Code. Note that this is not an exhaustive list of policies. Please refer to the [Corporate Policies](#) page on ACG's intranet site for additional policies and to your leadership for policies specific to your area or department.

ACG Corporate Fundraising Policy
ACG Corporate Ticket Policy
ACG Employment Policy Guide
ACG Gift Policy
ACG Media Relations Policy
ACG Record Retention and Disposal Policy
ACG Safeguarding Confidential & Sensitive Documents Policy
ACG Social Media Policy
Bank Secrecy Act/Anti-Money Laundering & Office of Foreign Assets
BSA AML OFAC - Suspicious Activity Report Procedure
Claims File Document Retention Schedule
Discrimination & Harassment Policy Drug-Free Workplace Policy
Fraud & Ethics Reporting and Investigation Policy
Incident Notification and Reporting Policy
Information Security Policy
Mobile Device Acceptable Use Policy
Operational Supplier Risk Management (SRM) Policy
Real Estate Services' Environmental and Sustainability Policy
Security Policy for Data Protection and Privacy