



Code of Conduct for ACG Vendors, Contractors and Consultants

Purpose

This Code of Conduct and Ethics (Code) for Auto Club Group (ACG) Vendors, Contractors and Consultants (Vendors) describes professional standards and provides an overview of regulatory requirements that Vendors are expected to follow to ensure a business relationship with ACG that is consistent with ACG standards of conduct and ethics. Depending upon the role, location, amount of time spent on ACG-related work, and ACG asset usage percentage, some contracted personnel may be required to adhere to more stringent requirements contained within this Code and in specific line of business code addendums.

Who this Code Covers

ACG partners with many Vendors who provide ACG products and services, either exclusively or non-exclusively, in the course of doing business. Although they are not employees of ACG, they 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 as outlined in [ACG's Code of Conduct](#).

Professional Conduct

Vendor representatives are required to conduct themselves in a professional, honorable and ethical manner when performing services on behalf of ACG. Vendors' behavior should never be detrimental to the interests or image of ACG, its employees, members or customers.

Conflict of Interest

Vendor representatives may not place their personal interests ahead of ACG's interests when performing duties on behalf of ACG and must avoid a conflict of interest or an appearance of a conflict that might arise because of personal self-interest.

Gifts, Gratuities and Entertainment

ACG's Gift Policy allows for the exchange of modest gifts, meals and entertainment with Vendors under certain restrictions, including but not limited to the following:

- Vendors must never offer anything of value that creates or appears to create preferential treatment or a conflict of interest.
- Vendors must never offer kickbacks or bribes.
- Vendors must never offer gifts or business courtesies, regardless of value, more than twice in a 12-month period to the same employee.
- Ordinary business meals and small tokens of appreciation such as gift baskets at holiday time generally are fine, but Vendors should avoid offering ACG employees frequent meals or expensive gifts.
- Gifts of cash or cash equivalents, such as gift cards, are never allowed.

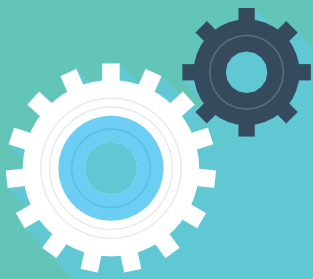
Laws

Vendors and their representatives will be responsible for complying with any and all local, state and federal laws as they pertain to the performance of their duties, including, but not limited to, Anti-Money Laundering/OFAC, Anti-Discrimination, Anti-Trust and Consumer Privacy Protection.

Protecting Company Assets

Vendor representatives working on ACG's behalf are trusted to behave responsibly and use good judgment when using Company assets. They have a responsibility to use Company equipment only for authorized business purposes.

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Business and Financial Records

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

Licensing

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

Safeguarding Confidential and Proprietary Information

Vendors 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 that ACG does not disseminate to the public. This information must be secured and not accessible to the public. Further, Vendors 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 access them at any time. ACG reserves the right to know all passwords and security codes and retains ownership of access to all Company systems and information on those systems. Vendors must cooperate with ACG to provide access to information on those systems when and as needed. They will make no attempt directly or indirectly to access any ACG files or computer systems by using someone else's authorization, computer identification or circumventing access control.

Safeguarding Vulnerable Groups

ACG respects the human rights and dignity of people throughout our organization, consumers with whom we interact, and suppliers with whom we contract. ACG expects the same of our vendors. This includes complying with all laws that prohibit forced labor and employment of underage children, laws that protect elders from financial abuse, as well as laws that prohibit human trafficking.



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Reporting

Vendors and their representatives 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 of others.