

SUPPLIER CODE OF CONDUCT

1. Introduction

Holman Enterprises, Inc. and its affiliates (collectively, "Holman") is a global integrated automotive services organization, applying a broad range of competencies, to provide solutions to our clients and customers. Privately held, and entering our 100th year of operations, at Holman, we are committed to Driving What's Right. That commitment includes conducting business in an ethical manner, in compliance with law.

The Holman commitment to Driving What's Right is a reflection of our Values, which are:

1. Together We Do The Right Thing
2. Together We Treat Others The Way We Want To Be Treated
3. Together We Trust And Support Each Other
4. Together We Are Passionate About Our Work And Find New Ways To Do It Better
5. Together We Do Good For The Community

Companies, like people, are known by the company they keep. So, at Holman, we apply our Values in selecting our suppliers, building relationships with our suppliers, and treating our suppliers as long term business partners.

To further assure that Holman, in Driving What's Right, we have developed this Supplier Code of Conduct, which sets forth the minimum standards of conduct that we expect from our suppliers--standards which we apply to ourselves.

We expect our business partners to adhere to this Supplier Code of Conduct (i.e. that they base their actions on these standards and comply with and observe applicable laws, regulations, and due diligence obligations), in addition to the provisions of the contractual terms agreed between Holman and the Business Partner.

Further, from time to time we may modify this Supplier Code of Conduct, based on changes in the business environment, differences in the types of business conducted by Holman (i.e. its affiliates), and differences in the jurisdictions in which Holman (i.e. its affiliates) operates. We may also issue interpretive guidance or suggestions around this Supplier Code of Conduct. Modifications and guidance or suggestions will be posted to Holman's Supplier Code of Conduct webpage(s).

For purposes of this Supplier Code of Conduct, the following definitions apply:

"Affiliate" means any person or legal entity controlling, controlled by, or under common contract with another person or legal entity, and control (including, with correlative meaning, the terms "controlling" and "controlled") means the possession, directly or

indirectly of the power to direct or cause at the direction of the management and policies of such person or entity, whether through the ownership of voting securities, by contract, or otherwise. can be a function of equity voting rights, debt or other contract covenants, or other

"Business partner" means any legal or natural person or legal entity with whom Holman has a business relationship where Holman receives goods or services from that person or entity, whether those goods or services are for Holman's own use, or to be used in connection with goods or services provided by Holman to customers, clients, and other third parties.

2. PRINCIPLES OF THIS SUPPLIER CODE OF CONDUCT

2.1 Content, Scope and Applicability

The Supplier Code of Conduct applies to all Holman business partners, i.e. any person or legal entity that provides goods or services to Holman, whether for Holman's own use, or to be used in connection goods or services provided by Holman to customers, clients, and other third parties.

For Holman, trusting and stable relationships with our business partners are an essential to our success. This Supplier Code of Conduct is an expression of the fact that cooperation with our business partners is based on shared values. We would like to provide a binding framework for these values, because lawful and responsible action is of central importance for our corporate success and the trust of our customers.

The Supplier Code of Conduct is based on national and international standards, including applicable laws and regulations, and generally accepted ethical principles.

We expect our business partners not only to adhere to the principles of this Supplier Code of Conduct themselves, but also to communicate them to their suppliers and business partners, and to take reasonable measures to ensure those suppliers, subcontractors, and other business partners conduct themselves in an ethical manner, in compliance with applicable law and regulation, and in accordance with the principles of this Code. The intent is guaranteeing compliance throughout the supply chain.

2.2 Compliance with Laws

At Holman, in addition to acting in an ethical manner, we strive to comply with all applicable laws and regulations in the countries in which Holman operates. We expect our business parties to act accordingly, i.e. in an ethical manner, in compliance with all applicable laws and regulations. Further, where national or local law or regulation deviates from the terms of this Supplier Code of Conduct, a business partner will comply with the stricter requirements.

3. SOCIAL STANDARDS AND HUMAN RIGHTS

At Holman, given our Values, observing human rights and providing good and safe working conditions are basic to responsible business management. We strive to assure our employees work in safe conditions, which then creates value for them and for Holman, and for the communities in which those employees work and live. We

expect our business partners to have the same commitment to observing human rights and providing good and safe working conditions for employees.

3.1 Occupational Health and Safety

Business partners are committed to protecting the health and safety of their employees.

That commitment includes regularly assessing hazards and potential health risks, taking the necessary protective measures and documenting actions in a risk assessment. In doing so, business partners will generally accepted occupational health and safety management principles, with appropriate systems. Business partners will strive to avoid hazards as far as possible, and where not possible, take appropriate precautions.

3.2 Prevention of Child Labor

Business partners will comply with applicable laws and regulations relative the minimum age of employment. Business partners will apply appropriate age verification measures prior to start of employment. On-the-job training programs compliant with law and regulation and meeting industry standards are encouraged. Where employment under the age of 18 is permitted, then the applicable business partner will apply special protective measures, to avoid dangerous work, or an adverse impact on health, safety, or personal development of such persons.

3.3 Prevention of Forced Labor

Business partners will assure that all work is done on a voluntary basis, compensated in accordance with applicable law and regulation. Business partners will not allow the use of forced labor, be involved with modern slavery (including bonded labor, debt slavery or peonage), allow work to be carried out under threat of punishment, or use coercion, or benefit from any of these activities.

3.4 Equal Opportunities and Non-Discrimination

Business partners will treat employees fairly and with respect. Business partners will comply with laws and regulations prohibiting discrimination in the workplace. For example, business partners will not discriminate, or allow discrimination, on the basis of gender (including gender identification), race, religion, age, family circumstances, sexual orientation, or other classification protected by applicable law or regulation.

3.5 Remuneration

Business partners will comply with laws and regulations governing wages, salaries, and benefits, including minimum wage and living wage laws and regulations, wage and hour laws and regulations, overtime laws and regulations, and benefits laws and regulations. Where a business partner is a party to a collective bargaining agreement, or the business partner's employees are organized and represented, whether by contract or under applicable law and regulation, then the business partner will comply with the terms of such contract or law and regulation.

3.6 Adherence to Working Hours

Business partners will ensure that the working hours of their employees do not exceed limits set by applicable law and regulation, with compensation as required by law or

regulation for overtime, and with work breaks, recovery time, days off, rest days or similar adjustments as required by applicable law or regulation.

4. ENVIRONMENTAL STANDARDS

At Holman, our Values (including Doing Good For The Community) mean that protecting the environment is of great importance to Holman. In fact, using resources in a sustainable way, on a path to a more sustainable future, is part of Driving What's Right. Accordingly, we expect our business partners to work efficiently and responsibly with their resources, in a sustainable way, on a path to a more sustainable future.

4.1 Environmental Legislation

Business partners will comply with applicable laws and regulations relative to protecting the environment and natural resources, as well as hazardous substances, recycling, waste disposal and the like. Business partners will obtain and maintain permits and licenses necessary or appropriate to their operations, including compliance with environmental law and regulations.

4.2 Responsibility for the Environment

Business partners will seek to operate efficiently and responsibly with their resources, in a sustainable way, on a path to a more sustainable future to reduce energy usage, water usage, waste production, and greenhouse gas emissions. As with other points in this Supplier Code of Conduct, business partners will apply good industry practices and pursue these goals systematically, on a continuous improvement basis.

4.3 Handling of Hazardous Substances

Business partners will, consistent with applicable law and regulation, work to protect employees and the environment. These activities include complying with applicable law and regulation to safely procure, store, use and dispose of hazardous substances and chemicals, training employees in these areas, and seeking to substitute less hazardous substances in business operations.

5. COMPLIANCE AND FAIR COOPERATION

Holman's first Value is, We Do The Right Thing, and that's entirely consistent with Driving What's Right. At Holman, honesty, integrity, fairness guide our actions. We expect the same from our business partners, and entering our 100th year, we have enjoyed that.

5.1 Business Integrity and Compliance Measures

Business partners will have in place an effective system to ensure that the business partner and its employees and its business partners, act ethically and with integrity, in compliance with applicable law and regulation, including areas of law and regulation referenced in this Supplier Code of Conduct. Business partners will design their system to include a risk assessment appropriate to the business partner and its activities, with continuous improvement of measures, structure, and processes. Business partners will design their system to include reporting of concerns without fear

of retribution, prompt investigation, appropriate remediation and reporting, all consistent with applicable law and regulation.

5.2 Anti-Corruption and Prevention of Money Laundering Activities

Business partners will have in place an effective system to guard against and prevent corruption, money laundering, and other white-collar crime (e.g. embezzlement or fraud). Without limiting the prior sentence, business partners will have in place an effective system to guard against and prevent conduct that is or could be a violation of the US Foreign Corrupt Practices Act, the UK Bribery Act, and other comparable laws of other countries.

5.3 Taxes and Correct Accounting

Business partners will comply with national and local tax law and regulations, including reporting and payment. In addition, business partners will maintain their books and records in accordance with generally accepting accounting principles and sound financial reporting.

5.4 Antitrust and Competition Law

Business partners will comply with applicable law and regulation relative to anti-trust and fair competition, including avoiding any price fixing, allocation of territories or customers, or other prohibited behavior.

5.5 Customs and Trade Law

Business partners will comply with applicable law and regulation relative to export, import, customs, and trade, including export or import embargoes or controls.

5.6 Avoidance of Conflicts of Interest

Business partners will take actions and decisions, and operate, on the basis of objective criteria set by the business, avoiding conflicts of interest in their interactions with Holman. A conflict of interest is a situation where a person, such as the business partner or a person at Holman, has multiple interests in a specific transaction or series of transactions, where serving one interest could work against another. Business partners will have in place procedures to guard against these situations, and to report and remediate them.

5.7 Protection of Confidential Information, Intellectual Property Rights of Third Parties and Data Protection

Business partners will protect Holman confidential information shared with business partners, will respect the intellectual property rights of Holman and others, and will comply with applicable data privacy and cybersecurity law and regulation. Business partners will apply reasonable technical and organization measures, as to the foregoing, applying continuous improvement concepts.

6. MONITORING COMPLIANCE

At Holman, we are Driving What's Right, and that starts with our Values, the first of which is Together We Do The Right Thing. This Supplier Code of Conduct builds on that, by establishing a set of clear expectations, to then foster trust and the long-term relationships we seek with our suppliers.

6.1 Verification of compliance with the Supplier Code of Conduct

Business partners will have systems and documentation, such as policies, in place to satisfy the requirements of this Supplier Code of Conduct. To confirm Holman's expectation, Holman may verify a business partner's compliance with this Supplier Code of Conduct by business partner self-disclosures and certifications, and third party certification. In certain circumstances, Holman may on reasonable prior notice, conduct on onsite audit of a business partner's facilities where goods or services provided by the business partner to Holman, originate or are generated. Holman's sole purpose, and the scope of any audit, will be to validate compliance with this Supplier Code of Conduct. Holman at its expense may engage a contracted service provider to conduct such audit.

6.2 Non-Compliance Mechanism

Business partners will, in case of a breach by a business partner of this Supplier Code of Conduct, undertake corrective action within a reasonable period, and will use all reasonable efforts to pursue and complete such action within a reasonable period.

At Holman, Driving What's Right is essential. So, adherence to this Supplier Code of Conduct is of great importance to Holman. Accordingly, in case of a breach by a business partner of this Supplier Code of Conduct, Holman may suspend or terminate the business relationship with the applicable business partner.

7. CONTACT AND RIGHT TO COMPLAIN

7.1 General Questions

If you have any general questions about the Supplier Code of Conduct, please direct your questions to Holman Procurement, 4001 Leadenhall Road, Mount Laurel, NJ, USA 08054, Attention: Chief Procurement Officer or email procurement@holman.com.

7.2 Reporting of Compliance Violations or Suspected Cases

For the reporting of compliance violations or suspected cases, as well as violations of this Supplier Code of Conduct, business partners may email Holman at the address provided above. In the alternative, business partners may contact the Holman Whistleblower Hotline, which is 1 855 754 3227, or business partners may email Holman at the following email address: www.holmanautomotive.ethicspoint.com.

7.3 Interpretation, Supplements, and Guidance

The Holman Policy Committee holds sole authority to interpret, supplement, and issue guidance under this Code. Further, Holman may where circumstances warrant, such as specific country laws, make adjustments to this Code or establish similar codes of conduct or policies to meet the requirements of the laws of such countries, and the operations of Holman affiliates in such countries.