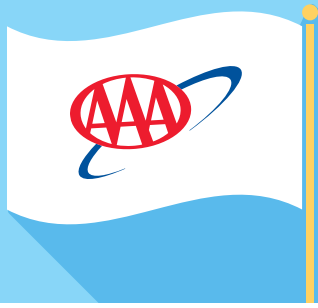


Always Do What's Right.

Vendors, Contractors
and Consultants

THE AUTO CLUB GROUP CODE OF CONDUCT

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Code of Conduct for ACG Vendors, Contractors and Consultants

Expected Shared Behaviors

Although they are not employees of ACG, vendors 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.

Who this Code Covers

This Code of Conduct and Ethics (Code) is for vendors, contractors, consultants and their representatives (Vendors) who provide Auto Club Group (ACG) products and services, either exclusively or non-exclusively, in the course of doing business. Vendors are expected to share ACG's commitment to creating and maintaining an appropriate work environment as outlined in ACG's Values, Code of Conduct and Corporate Policies.

Purpose

The ACG Code for Vendors, Contractors and Consultants describes the professional standards expected of our partners. It also communicates an overview of behavioral requirements that Vendors are expected to follow to ensure a business relationship that consistently aligns with ACG standards of conduct and ethics.

Professional Conduct

Vendors are required to conduct themselves in a professional and ethical manner when performing services for ACG. Vendors' behavior should never be detrimental to the interests or image of ACG, its employees, members or customers. ACG is committed to creating a work environment free of harassment and bullying and our Vendors are expected to partner with us to prevent a hostile work environment.

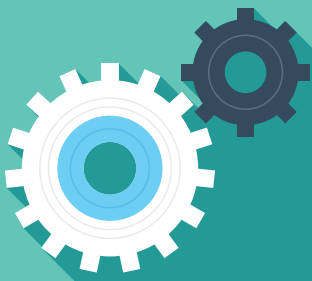
Conflict of Interest

Vendors may not place their personal interests ahead of ACG's interests when performing duties for ACG.

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.



Code of Conduct for ACG Vendors, Contractors and Consultants

(continued)

Company Assets

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

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

Laws

Vendors will be responsible for complying with any and all local, state and federal laws, regulations, and executive orders as they pertain to the performance of their duties, including, but not limited to, Anti-Money Laundering/OFAC, Anti-Discrimination, Anti-Trust, Public Health, Cyber/Data Security and Consumer Privacy Protection. Vendors will also follow applicable laws regarding employment of their employees.

Protecting Company Assets

Vendors working for ACG are trusted to behave responsibly and use good judgment when using ACG assets. They have a responsibility to use ACG equipment only for authorized business purposes.

Business and Financial Records

Vendors 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 hours, 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

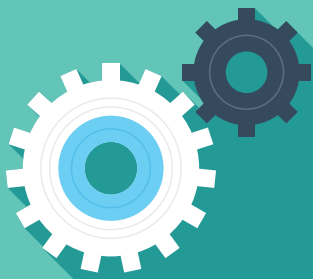
Vendors are responsible to obtain all necessary business and producer licenses and state registrations that may be required of them or their staff.

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 not disseminated 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 monitor and access them at any time. Vendors must cooperate with ACG to provide access to information on those systems when and as needed. Vendors will make no direct or indirect attempt to access any ACG files or computer systems by using someone else's authorization, computer identification or circumventing access control.



Code of Conduct for ACG Vendors, Contractors and Consultants

(continued)

Social Media

Vendors must not represent their opinions and ideas as those of ACG on any social media platform.

Sustainability

ACG expects our Vendors to remain socially and environmentally responsible to the extent applicable.

Safeguarding Vulnerable Groups

Vendors are expected to comply with all laws prohibiting forced labor and employment of underage children and human trafficking. They must also comply with laws protecting elders from financial abuse.

Safety

ACG expects Vendors to perform duties in accordance with OSHA and similar safety standards to avoid illness or injury to themselves or others.

Reporting

Vendors 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](tel: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.