



**FLEET MANAGEMENT**

# **SUPPLIER CODE OF CONDUCT**





## FLEET MANAGEMENT

Enterprise Fleet Management operates a network of more than 50 fully-staffed offices, which manages more than 430,000 vehicles in the U.S. and Canada. We provide local service to businesses, government agencies, and organizations operating medium-sized fleets of 20 or more vehicles, as well as to those seeking an alternative to employee mileage reimbursement programs.

As we have grown to be an industry leader in fleet management, our suppliers have become critically important in helping us deliver excellent customer service.

We select suppliers and partners that share our values and commitment to uphold the highest standards of quality, integrity, excellence, safety, legal compliance, and respect for human rights, as well as to respect the customs and culture of the communities we serve. To help promote a common understanding of what is expected of suppliers, we have developed a Supplier Code of Conduct. All suppliers are expected to understand the Code and adhere to its spirit and intent.

As our valued partner, we hope you will take the opportunity to review the principles outlined in this Code. As appropriate, please share it with members of your organization who work with Enterprise Fleet Management. If you have questions, or if you believe that any company or individual working for or on behalf of Enterprise Fleet Management has violated this Supplier Code of Conduct or engaged in illegal or unethical behavior, we encourage you to reach out to your main point of contact at Enterprise Fleet Management or via Enterprise Fleet Management's ethics hotline.

We rely on a broad network of suppliers and business partners. Thank you for being a part of that network and for helping us remain strong and successful.



# Table of Contents

---

**INTRODUCTION** **4**

---

**PRINCIPLES** **4**

Expectations of Management

Monitoring

Working with Minority and Women Suppliers

---

**PRACTICES** **5**

Ethical Sales Practices

Contract Compliance

---

**HONESTY AND INTEGRITY** **5 – 6**

Accounting and Business Records

Conflicts of Interest

Gifts and Entertainment

Anti-corruption

Business Property

Protecting Information

---

**TEAMWORK** **7**

Harassment

Discrimination

Following Safety Procedures

---

**COMMUNITY** **7**

Working Hours and Fair Wages

Human Rights

Protection of the Environment

---

**ETHICS HOTLINE** **8**

How to Raise Concerns and Report Code Violations

# Introduction

Enterprise Fleet Management is committed to building mutually beneficial, long-term relationships with business partners and suppliers who share the commitment to conducting business with honesty and integrity. This Supplier Code of Conduct (referred to herein as the “Supplier Code of Conduct” or the “Code”) outlines our expectations and provides guidance for suppliers, vendors, agents, business partners, consultants and contractors (collectively referred to as “Suppliers”) on how we can work together to meet the shared goal of delivering a best-in-class customer service experience throughout our business operations.

## Principles

### EXPECTATIONS OF MANAGEMENT

Enterprise Fleet Management expects its Suppliers to manage their businesses in a manner that fosters a culture of compliance, both with legal requirements and with the standards and principles outlined in this Supplier Code of Conduct.

### MONITORING

In addition to complying with the practices and behaviors outlined in the Code, Enterprise Fleet Management expects Suppliers to ensure that their respective accounting and business records are complete, honest, and accurate. From time to time, we may ask to review a Supplier’s records or visit their facilities as allowed by individual contracts.

Suppliers are expected to regularly monitor their businesses and operations for violations of law and of this Supplier Code of Conduct, as well as to identify other areas for improvement. Suppliers are also expected to be responsible for managing their supply chain, including subcontractors and third-party labor agencies, in accordance with the standards contained in this Code.

Enterprise Fleet Management expects all Suppliers to embrace the standards and principles of this Code, and we are prepared to impose consequences for non-compliance, up to and including termination of the business relationship.

### WORKING WITH MINORITY AND WOMEN SUPPLIERS

Enterprise Fleet Management strives to maintain a Supplier base that reflects the communities in which the divisions operate. To this end, we provide equal opportunities to minority-owned businesses: Minority Business Enterprise (MBE certified); women-owned businesses: Women Business Enterprise (WBE certified); veteran-owned businesses: Veteran-owned Small Business (VOSB); Service Disabled Veteran-owned Business (SDVOSB); and disadvantaged and small businesses: Disadvantaged Business Enterprise (DBE certified), Small Disadvantaged Business (SDB certified), ACDBE certified, 8(a) certified, and HubZone certified; and any other socially or economically disadvantaged small businesses. Enterprise Fleet Management is committed to expanding and maintaining these relationships, while working only with partners who provide products and services of the highest quality.

# Practices

## ETHICAL SALES PRACTICES

Suppliers involved in selling, advertising, promoting, and marketing on Enterprise Fleet Management's behalf must ensure that the statements they make about our products and services are fair, factual, and complete.

## CONTRACT COMPLIANCE

This Code is intended to complement, rather than replace any legal agreement or contract between a Supplier and Enterprise Fleet Management, Inc., and/or its operating divisions, whether the agreement is executed collectively or with single operating divisions. Failure to abide by the terms or conditions of an existing agreement violates the trust that has been mutually built over the course of our working relationship and may have legal consequences.

Some Enterprise Fleet Management divisions are contractors with the federal government, which can require adherence to additional rules and regulations, including but not limited to, specific operational controls, standards of ethical business conduct, audit accessibility, reporting, and assurances of compliance with certain labor and employment regulations, as well as other laws. As these provisions extend to Enterprise Fleet Management sub-contractors and Suppliers, we expect full compliance with these rules and requirements, whether or not specifically stated in a contract.

All Suppliers are invited to discuss any concerns about the nature of a contract or a specific requirement with their immediate point of contact at Enterprise Fleet Management.

# Honesty and Integrity

## ACCOUNTING AND BUSINESS RECORDS

Suppliers are expected to report transactions and events in a clear, timely, and accurate manner. Every record and accounting entry must be complete and may not hide or disguise the true nature of any transaction. All financial records must conform either to a reasonable system of internal controls or, where applicable, to generally accepted accounting principles.

## CONFLICTS OF INTEREST

A conflict of interest occurs when an individual's personal interests interfere with his or her ability to make unbiased business decisions. When working on Enterprise Fleet Management's behalf, Suppliers' actions should be based on sound business judgment, not motivated by personal gain. Any situation that creates—or appears to create—a conflict between a personal interest and Enterprise Fleet Management's interests must be avoided.

Conflicts of interest, whether actual or potential, should be disclosed to the Suppliers' main point of contact at Enterprise Fleet Management or Enterprise Fleet Management's ethics hotline as soon as possible, so that they can be managed and/or resolved appropriately.

# Honesty and Integrity Cont...

## GIFTS AND ENTERTAINMENT

Business gifts, entertainment, or any other item of value, can be common courtesies between business partners. However, such a courtesy should never compromise the ability to make objective business decisions. In some circumstances, business gifts and entertainment may be acceptable. Any courtesy, given or received, must be in compliance with applicable law. For guidance on what is acceptable, please consult your immediate point of contact at Enterprise Fleet Management.

## ANTI-CORRUPTION

Enterprise Fleet Management does not tolerate bribery. Suppliers must not directly or indirectly promise, offer, or authorize the giving of something of value for improper reasons, including to secure improper advantage, gain influence, or reward improper performance of any function or activity. Suppliers must not permit, or engage in embezzlement, extortion, kickbacks or reciprocity, or other forms of corruption in connection with their business relationship with Enterprise Fleet Management.

## FAIR COMPETITION

Suppliers are expected to comply with all applicable antitrust and fair competition laws and regulations and to avoid any action that would illegally restrain or thwart the efforts of competitors. These laws prohibit practices in restraint of trade, such as price fixing, predatory pricing, misrepresenting, or harassing a competitor, stealing trade secrets, dividing customers, offering or taking bribes, and accepting kickbacks.

## BUSINESS PROPERTY

Theft, carelessness, and unnecessary waste have a direct impact on our mutual success. When Enterprise Fleet Management entrusts vehicles or other business property to a Supplier, these assets must be used only for intended and authorized business purposes. Suppliers are responsible for protecting Enterprise Fleet Management's property and not putting it at risk for loss, theft, or damage.

## PROTECTING INFORMATION

Enterprise Fleet Management places the highest priority on protecting the privacy and personal information of customers and employees. As our partners in business, Suppliers are also responsible for helping to ensure the protection of confidential information, intellectual property, and personal information belonging to Enterprise Fleet Management customers and employees. Suppliers with access to these types of information may not disclose it to other parties without Enterprise Fleet Management's expressed consent.

Confidential information includes but is not limited to customer or employee lists, customer or employee personal information, computer files, policies and practices, marketing plans, pricing, costs, and other financial information. Suppliers should limit access to those who have a business need and take every precaution necessary to avoid the improper release of proprietary or confidential information.

Likewise, Suppliers with access to personal information about Enterprise Fleet Management's customers and employees must ensure that this information is adequately safeguarded in accordance with all applicable data privacy and information security laws and regulations and consistent with best practices and security standards in Supplier's industry. The level of security and protection shall be commensurate with the nature of the Enterprise Fleet Management information that needs to be protected. Suppliers must maintain the appropriate process and internal controls for paper records, computer systems, portable electronic devices, laptops, and other storage devices to assure the protection of this information. Suppliers must promptly notify Enterprise Fleet Management of any actual or potential data security breach involving Enterprise Fleet Management's personal information.

Suppliers are also expected to follow all applicable securities laws and standards, such as Payment Card Industry Data Security Standards (PCI-DSS) to protect cardholder information from various imminent harms.

# Teamwork

## HARASSMENT

At Enterprise Fleet Management we expect Suppliers to treat others with respect, meaning that harassing conduct is not acceptable in any form. While harassment may have different definitions, we consider it to include any unwelcome behavior, sexual or non-sexual, toward another person that has the purpose or effect of creating an intimidating, hostile, or offensive work environment.

## DISCRIMINATION

Organizations are made stronger by respecting and fostering a diversity of backgrounds, cultures, and opinions. Suppliers are expected to observe and promote laws that prohibit discrimination based on a person's race, color, religion, sex, national origin, disability, age, sexual orientation, gender identity, veteran status, or any other status protected by federal, state, and local laws. Suppliers must be committed to fair and equal treatment for, and the personal privacy and dignity of, every employee and applicant for employment.

## FOLLOWING SAFETY PROCEDURES

Supplier workplaces must adhere to all applicable safety laws and regulations, and also take the proper precautions to ensure that all machinery and tools are functional and used properly at all times.

To ensure personal safety as well as the safety of products and services provided to the community, Enterprise Fleet Management Suppliers must provide all workers with appropriate protective equipment. Suppliers must also ensure that all workers are fully certified and capable of performing their job duties and operate only the authorized equipment they have a business reason to use.

When accidents occur on the premises of, or while performing work for Enterprise Fleet Management, Suppliers must report them right away to their immediate point of contact at Enterprise Fleet Management. Suppliers must also agree to share their safety records with Enterprise Fleet Management upon request.

# Community

## WORKING HOURS AND FAIR WAGES

For the benefit of the communities we serve, Enterprise Fleet Management expects Suppliers to follow all applicable wage and hour laws, including minimum wage, overtime, and maximum hour rules.

## HUMAN RIGHTS

Enterprise Fleet Management will not tolerate child or forced labor or any other unacceptable treatment of workers, and we will not partner with companies that employ any child or forced labor, either directly or indirectly. Specifically, this means that Suppliers must not permit exploitation of children, physical punishment or abuse, or involuntary servitude.

## PROTECTION OF THE ENVIRONMENT

Suppliers must comply with all environmental laws and regulations where our business is conducted. Suppliers are encouraged to minimize the use of non-renewable resources, reduce and recycle waste, and minimize the environmental impact of their operations where possible. Suppliers sourcing products should present environmentally preferable options and ensure that materials are disposed of in an environmentally responsible manner.

# Ethics Hotline

## HOW TO RAISE CONCERNS AND REPORT CODE VIOLATIONS

If you observe or reasonably suspect an individual, whether supplier or Enterprise Fleet Management employee or contractor, to be in violation of the Code, we urge you to report the incident to your main point of contact at Enterprise Fleet Management. Enterprise Fleet Management also supports a third-party-administered ethics hotline that Suppliers may use to report anonymously, where allowed by law:

- United States and Canada
  - By Phone: **1-888-238-1483**
  - Web: [www.ethicspoint.com](http://www.ethicspoint.com) or <https://secure.ethicspoint.com/domain/media/en/gui/17305/index.html>

Enterprise Fleet Management promptly and thoroughly investigates all reports made through the ethics hotline, and we keep these reports confidential to the degree possible. We will take corrective action when warranted.

Suppliers and their employees have the opportunity to raise concerns without fear of retaliation. Enterprise Fleet Management does not tolerate retaliatory acts against anyone who makes a report in good faith, even if the reporter is not positive that it is correct.

