

## THIRD PARTY STANDARDS OF CONDUCT

These Third Party Standards of Conduct (“Standards”) represent Avis Budget Group’s commitment to foster sustainable relationships with our business partners, agents, consultants, suppliers and other third parties (“Third Party(ies)”) and ensure that they uphold ethical standards and adhere to social and environmental responsibilities for the good of the communities that we serve and the promotion of human rights.

Avis Budget Group expects that Third Parties, in all their activities, will comply with all applicable laws, rules and regulations of the countries and localities in which they operate, whether or not specifically referenced in these Standards. These Standards describe what we consider to be appropriate business conduct for Third Parties to ensure that they conduct their operations with a high degree of integrity, and in a socially and environmentally responsible manner.

### COMPLIANCE WITH LAWS AND REGULATION

Third Parties will comply with all applicable local, national and international laws, regulations, treaties and industry standards, including, without limitation, those pertaining to the manufacture, pricing, sale and distribution and safety of the relevant products and/or services. In the event the requirements of these Standards are stricter than applicable local, national or international law, Third Parties will comply with these Standards. However, if there is any conflict between the requirements of these Standards and the requirements of any applicable local, national or international law, the Third Party is to comply with the local, national or international law. Third Parties will notify Avis Budget Group in writing of any such conflicts.

### LABOR AND HUMAN RIGHTS

#### Child Labor

Third Parties shall not use child labor unless it is part of a government-authorized job training or apprenticeship program and then only in strict compliance with all applicable laws and regulations.

#### Compensation and Work Hours

At a minimum, Third Parties will comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime, maximum hours, piece rates and other elements of compensation, and provide legally mandated benefits.

#### Forced Labor

Third Parties shall not use forced labor, regardless of its form. Avis Budget Group will not tolerate physically abusive disciplinary practices.

## **Harassment and Discrimination**

Avis Budget Group's mission is to create a culture and a business environment based upon transparency, inclusion, mutual respect, responsibility, and understanding. Third Parties will not discriminate in hiring and employment practices, including salary, benefits, advancement, discipline, termination or retirement, on the basis of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, marital status, political opinion, disability, or any other category protected by law. Third Parties will treat each employee with dignity and respect, and will not use corporal punishment, threats of violence or other forms of physical, sexual, psychological or verbal harassment, abuse or intimidation.

## **HEALTH AND SAFETY**

Third Parties are expected to provide a safe working environment that supports accident prevention and minimizes exposure to health risks. Third Parties are expected to comply with all applicable safety and health laws and regulations in the countries in which they operate. Avis Budget Group may, from time to time, request to audit such records.

## **SUSTAINABILITY**

### **Protecting the Environment**

Third Parties must conduct business in an environmentally friendly and responsible manner. Third Parties should endeavor to reduce and minimize the environmental impact of all of their operations in the short term, and planning for long-term sustainability.

### **Community Engagement & Indigenous Populations**

Third Parties shall consider the local community and the indigenous peoples regarding the impact that the Third Party's business will have on them. Third Parties should openly and honestly engage with local governments and communities to improve the educational, cultural, economic and social well-being of the communities in which they live and serve.

## **ETHICS**

### **Business Integrity**

Corruption, bribery, extortion, embezzlement, and other questionable/inappropriate business practices, in any form are strictly prohibited. Third Parties shall not violate the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, any international anti-corruption conventions, and applicable anti-corruption laws and regulations of the countries in which they operate, and shall not engage in the practice of corruption, extortion or embezzlement in any form. Third Parties shall not offer bribes or other means to obtain an undue or improper advantage. Third Parties shall under no circumstances, tolerate the giving or receiving of undue reward to influence the behavior of another individual, organization, politician or government body, so as to acquire a commercial advantage; this extends to all operations, regardless of whether bribery is otherwise tolerated and condoned. Third Parties must conduct business in a fair, transparent and ethical manner at all times. Nothing in this

Standards of Conduct shall be construed as intended to limit or restrict activities that may be otherwise lawful, including legally permissible campaign contributions to political parties and candidates.

### **Conflict of Interest**

Third Parties are required to avoid any relationship or activity that might create or give the appearance of creating a conflict of interest. A conflict of interest would be (i) any set of circumstances where the proprietary or confidential information of Avis Budget Group could be comprised; or (ii) where the best interest of Avis Budget Group may be compromised in favor of yourself or another party.

### **Dealing Honestly with other Third Parties**

Third Parties will deal honestly with other third parties, and provide accurate and complete information in all communications and representations.

### **Disclosure of Information**

Third Parties must accurately record and disclose information regarding their business activities, structure, financial situation and performance in accordance with applicable laws, rules and regulations.

### **Protection of Intellectual Property and Confidential Information**

Third Parties must respect intellectual property rights; safeguard customer information; and transfer of technology and know-how must be done in a manner that protects intellectual property rights. Avis Budget Group is dedicated to complying with applicable laws concerning proprietary, confidential and personal information. Third Parties are expected to comply with all applicable laws, rules and regulations governing the protection, use and disclosure of Avis Budget Group's proprietary, confidential and personal information.

### **Whistleblower Protection**

Third Parties must not tolerate any retaliation against any employee who makes a good faith report of an ethics violation or instances of abuse, intimidation, discrimination, harassment or any violation of law or of these Standards, or who assists in the investigation of any such a report.

## **MANAGEMENT COMMITMENT**

### **Risk Assessment and Management**

Third Parties must strive towards the continual identification of environment, health, safety, business ethics, labor, human rights, and legal compliance risks associated with their operations. Third Parties should periodically conduct self-evaluations to ensure that they are, along with their subcontractors, complying with these Standards. This ongoing risk assessment must be used by Third Parties to determine the relative significance of each risk, and implement appropriate procedures/controls to ensure that these risks are mitigated. If a

Third Party identifies a risk that cannot be mitigated, which has the potential to impact the products and/or services has provided to Avis Budget Group, Third Parties must notify Avis Budget Group of this risk in writing.

### Documents and Records

Third Parties shall have processes to identify, monitor and understand applicable laws and regulations and the additional requirements imposed by these Standards. Third Parties shall obtain, maintain and keep current a valid business license and any other certifications as required by applicable laws and regulations.

### REPORTING QUESTIONABLE BEHAVIOR

If you wish to report questionable behavior or a possible violation of the of these Standards or the Avis Budget Group Code of Conduct you are encouraged to contact our Business Ethics & Compliance Team through any of the following methods:

- ➔ Contact your Avis Budget Group contract manager or primary contact,
- ➔ Send an email to:

[Integrity@avisbudget.com](mailto:Integrity@avisbudget.com) or [corporate.compliance@avisbudget.com](mailto:corporate.compliance@avisbudget.com)

- ➔ Write to:

Avis Budget Group, Inc.  
Attention: Business Ethics & Compliance Team  
6 Sylvan Way, Parsippany, NJ 07054

Avis Budget Group will maintain confidentiality to the extent possible, and will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or a possible violation of these Standards of Conduct or the Company's Code of Conduct.

### Online Version

The Avis Budget Group Third Party Standards of Conduct is available online at:  
<http://www.avisbudgetgroup.com/docs/3PStandardsofConduct.pdf>.

Avis Budget Group reserves the right to modify these Standards at any time. Therefore, you should check this website frequently to review the then-current Standards.