



# OPTIMAL®



## Global Supplier Code of Conduct

Since our founding in 1998, LKQ Corporation has been guided by values of honesty and trust and has been committed to protecting and enhancing our reputation for quality products and exceptional service.

LKQ Corporation continues that tradition today as we are guided by the following Core Values:

- Dependable
- Excellence
- Leadership
- Integrity
- Value
- Efficient
- Responsive

LKQ Corporation is committed to conducting business the right way. We have internal controls that give our company structure and provide guidance on values, conduct, and behavior. Each LKQ Team Member is expected to act in an honest and fair way with everyone that we do business with.

We adhere to a Code of Ethics with written guidelines that help us clearly identify that fraud, deception, dishonesty, unfair competition, and other questionable personal and business integrity actions are not allowed. These guidelines also help us understand that LKQ Corporation's culture involves fostering a healthy and safe work environment, being fair and honest, showing respect and support of our team members, and following all laws and regulations.

LKQ Corporation also expects its suppliers to meet minimum ethical and legal standards. When performing services for, or related to, LKQ, we require our suppliers, regardless of location, to:

- Act with honesty and integrity
- Maintain a fair and safe workplace
- Understand and comply with the laws and regulations that apply to its business in the countries where it does business
- Read, understand, and follow this Supplier Code
- Ensure compliance with this Supplier Code by each of its officers, directors, employees, other workers, representatives, agents, subcontractors, and sub-tier sources who are involved in the procurement and production process related to products and services provided to LKQ Corporation and its affiliates
- Cooperate with inspections, audits, and investigations.



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Prior to engaging in business or during an existing business relationship, LKQ Corporation may conduct diligence on its suppliers, their owners, and key personnel to assess compliance with this Supplier Code and address LKQ's business needs. This diligence may involve checking watch lists and sanction lists as well as other publicly available information about companies and individuals.



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## Introduction

This Supplier Code establishes the standards for conducting business with LKQ Corporation and its affiliates. Suppliers using subcontractors to provide goods and services to LKQ will also be responsible for the subcontracted party's compliance with this Supplier Code. LKQ reserves the right to monitor supplier compliance with this Supplier Code through supplier surveys and certifications as well as other means that LKQ deems appropriate, including but not limited to on-site inspections or audits. If a supplier is found in violation of this Supplier Code, LKQ will, at a minimum, require the supplier to take prompt, remedial measures to cure the violation, including instituting clear and trustworthy action plans to ensure compliance with this Supplier Code. While LKQ is committed to working with suppliers to improve workplace conditions, LKQ also maintains the right to terminate its relationship with any supplier that fails to meet its responsibilities or comply with its obligations under this Supplier Code.

“Supplier Code” means this Supplier Code of Conduct. “Suppliers” or “you” means any company, corporation, or other entity or person that sells goods or services to LKQ and its affiliates, including the supplier's employees, other workers, representatives, agents, subcontractors, and other sub-tier sources. “LKQ” means LKQ Corporation and its subsidiaries and affiliates.

## Comply with applicable laws, rules and regulations

While laws, regulations, business practices, and customs can vary greatly from one country to the next, this Supplier Code sets forth the minimum requirements that all of LKQ's suppliers must meet. Each supplier must, where local law imposes a higher standard, comply with such laws and regulations applicable to its business in the countries where it does business.

### A. Anti-Bribery and Anti-Corruption

Suppliers must comply with all applicable anti-corruption laws and regulations of the countries in which they operate, such as the U.S. Foreign Corrupt Practices Act, and as applicable, the UK - Bribery Act. Offering or paying bribes, facilitation payments or anything of value to win business or obtain an unfair advantage is unacceptable, even if business is lost or difficulties are encountered as a result (for example, delays in obtaining permits or licenses). LKQ's suppliers are also prohibited from engaging in corruption, extortion, or embezzlement in any form.

#### Examples of Red Flags

- Offers of extravagant or multiple gifts or entertainment
- Third parties who do not clearly account for their expenditures or whose commissions seem in excess of the services provided
- Customers or officials who hint or suggest that certain payments be made to obtain business or information
- A request that a third party make a payment to an official to expedite the handling of a matter such as customs clearance.



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## B. Gifts, Entertainment, and Hospitality

LKQ's suppliers are required to understand and comply with this Supplier Code and the law when offering or accepting any gifts, favors, meals, entertainment, or hospitality to or from LKQ employees, customers, or other business partners or their family members. Any such gift, entertainment, or hospitality must be consistent with customary regional business practices and the recipient's policies—and it must not adversely affect the reputation of LKQ or the supplier if publicly disclosed. In addition, LKQ's suppliers must not create or give the appearance of a conflict of interest when engaging in these practices.

### Examples of Red Flags

- Gifts or entertainment involving a government official
- Gifts or entertainment of more than nominal value
- Gifts or entertainment of any value offered to a LKQ employee in a position to make a decision about the gift giver
- Inappropriate gifts such as cash
- Gifts or entertainment offered during a tender process.

## C. Global Trade Compliance

LKQ's suppliers are required to comply with all applicable international trade laws and regulations, including import, export, and re-export controls regulations.

### Examples of Red Flags

- Suppliers who attempt to provide lower value invoice totals with imports to lower duties owed on imported goods or who misclassify goods on invoices to avoid antidumping duties
- Suppliers who transship products to hide actual country of origin or content that would be subject to importing country restrictions or sanctions.

## D. Fair Dealing and Competition Laws

LKQ succeeds by competing fairly and dealing truthfully with customers and business partners, without manipulation, abuse, misrepresentation of material facts or any other unfair dealing. LKQ's suppliers are required to uphold fair business standards in advertising, sales, and competition. LKQ's suppliers are required to comply with applicable antitrust and competition laws where they do business. These laws prohibit agreements between competitors that affect prices, costs, terms or conditions of sale, the markets in which they will compete, or customers or suppliers with whom they will do business. These laws may also regulate distribution agreements, rebates, discounts, or territorial restrictions on resellers.

### Examples of Red Flags

- Any competitor who attempts to discuss competitive information such as pricing, bids, sales, or territories
- Discussions at trade associations, meetings, or events where competitors are in attendance which relate to prices, markets, profits, or other topics that could be of interest to competitors

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## E. Conflicts of Interest

LKQ's suppliers should avoid even the appearance of a conflict of interest in their dealings with LKQ. LKQ's suppliers must disclose involvement in actual or apparent conflicts of interest between the supplier's interests and the interests of LKQ at [lkqcoiform.ethicspoint.com](http://lkqcoiform.ethicspoint.com) so that they may be managed, resolved, or removed by LKQ.

### Examples of Red Flags

- A supplier employee has a second job at a current or potential competitor of LKQ
- A supplier has a substantial ownership interest in a current or potential competitor of LKQ (other than nominal investments in public companies)
- An LKQ employee or their immediate family member owns or holds any significant interest in a supplier.

## F. Anti-Money Laundering

LKQ does not knowingly conduct business with suppliers involved in illegitimate business activities. LKQ's suppliers are required to comply with applicable laws relating to money laundering.

### Examples of Red Flags

- Any proposed or actual payments in cash from a customer or partner
- Customers who overpay for goods or services, and then request a refund
- Any customer, supplier, agent, or partner who provides incomplete or suspicious information
- Funds paid to/from unusual sources or to/from countries not normally associated with the customer.

## G. Conflict Minerals

LKQ's suppliers must exercise their own due diligence, and cooperate in due diligence requests made by LKQ, with respect to any products containing Conflict Minerals, whether or not those materials or products may have been mined or produced in the Covered Countries or obtained from recycled sources.

“Conflict Minerals” means tin (Cassiterite), tungsten (Wolframite), tantalum (Columbite-tantalite or coltan), and gold, and the derivative metals from these minerals. “Covered Countries” means The Democratic Republic of the Congo, Angola, Burundi, Central African Republic, The Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.



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## H. Environment

LKQ is committed to creating economic value for shareholders and customers through sustainable practices that protect the long-term well-being of the environment, LKQ's employees, and the communities in which it operates. LKQ's suppliers are required to comply with all applicable environmental laws, regulations, and standards and minimize any adverse impact on the environment. LKQ's suppliers must also endeavor to conserve natural resources and energy and reduce or eliminate waste and the use of hazardous substances. Suppliers are required to effectively manage the safe handling, movement, storage and disposal of chemicals and substances that could be hazardous to the environment.

## I. Inside Information

You must not buy or sell the securities of LKQ or any other company if you possess inside information that is not available to the investing public and could influence an investor's decision to buy or sell the security (for example information about winning or losing a contract). You also cannot give inside information to others who might use it to buy or sell securities.

## J. Whistleblower Protection

LKQ expects suppliers to protect worker whistleblower confidentiality and prohibit retaliation against workers who report workplace grievances. Suppliers are required to create a mechanism for workers to submit their grievances in a confidential and (where local law permits) anonymous manner and maintain an effective process to investigate and address worker concerns. Workers employed by subcontractors must have a mechanism in place to bring their concerns to management teams above the subcontractor.

## Protect LKQ's assets, information, and reputation

LKQ's suppliers are required to preserve, protect, and responsibly use LKQ property that they have access to, and protect it from theft, damage, loss, and misuse. This includes physical and intangible assets such as ideas, inventions, technology, brands, and confidential information.

## A. Intellectual Property

Suppliers are required to respect intellectual property rights, both during their contract with LKQ and thereafter. Patents, copyrights, and trademarks belonging to others may not be used without express permission from the owner. Any transfer or sharing of technology or know-how must be done on a need-to know basis and in a manner that protects intellectual property rights and is in compliance with local law.



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## B. Confidential Information, Data Security, and Privacy

Suppliers are required to safeguard LKQ's proprietary and confidential information, which includes all information, whether written or oral, that LKQ has a legitimate business interest in protecting. This includes technical, design or process data, improvements, new products, products in development, inventions, models, manuals, know-how, financial data, pricing information, business development or acquisition plans, marketing plans, project practices, and customer and supplier lists. Suppliers may not use LKQ's proprietary and confidential information except for the purposes for which it was provided without LKQ's prior authorization. Suppliers must request and receive LKQ's express permission prior to disclosing their association with LKQ publicly via newspapers, magazines, social media and the internet, television, radio, or other outlets.

Suppliers are required to follow all applicable privacy laws that govern the handling of information and data provided by LKQ, which may include private and sensitive personal information.

### Examples of Red Flags

- Discussing confidential information with third parties without a confidentiality agreement
- International data transfers involving personal data from the European Union
- Inadvertent disclosure of confidential information in external meetings
- Unattended or unprotected computers or mobile devices that contain LKQ proprietary and confidential information
- Requests for data from questionable sources
- Non-transparent subcontracting by suppliers of data processing and cloud computing
- Using LKQ's proprietary or confidential information beyond the scope of the engagement or for the supplier's or other's benefit.

## C. Records Management and Cooperation with Inspections, Audits, and Investigations

Suppliers must retain documents and records in accordance with applicable law, including accounts, quality reports, time records, expense reports, and submissions to LKQ, regulatory authorities, or others. This also includes documentation necessary to demonstrate compliance with law and this Supplier Code or relevant to any pending litigation, audit, or investigation. Suppliers must cooperate with requests for inspections, audits, and investigations by LKQ or any of its authorized agents relating to compliance with this Supplier Code. Such inspections, audits, or investigations may be conducted on-site.

## Maintain a fair and safe workplace

### A. Safety

LKQ's suppliers have a responsibility to promote a safe, clean, and secure workplace, provide necessary medical treatment and implement corrective actions to eliminate causes of injury, and conduct operations in compliance with applicable health and safety laws and regulations. Suppliers who provide residential facilities for their employees must also provide safe and healthy facilities and there shall be no unreasonable restrictions on entering, exiting or movement within company-provided facilities. LKQ also requires its suppliers to know, understand, and comply with all applicable laws governing product safety and quality.



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## Examples of Red Flags

- Failure to follow applicable safety regulations or policies
- Unsafe workplace conditions or practices such as exposed hazards, blocked emergency exits, or failure to use safety equipment
- Workers using, possessing, or being under the influence of alcohol, illegal drugs, or any substance that could interfere with safely performing their work
- Providing worker accommodations that are not clean, safe, or meet basic needs
- Failing to adhere to product safety and quality requirements.

## B. Ethical Employment Practices and Non-Discrimination Policy

LKQ endeavors to conduct its business in a socially responsible and ethical manner consistent with human rights principles. Our approach to human rights is guided and informed by international standards.

LKQ recognizes the value of diverse skills, ideas, and backgrounds, and requires its suppliers' workplaces to be inclusive and professional and free from discrimination, harassment, and abuse. Each supplier must, in relation to employees, other workers, and applicants for employment, do the following as applicable:

- Treat each person with dignity and respect and afford them equal opportunity to the fullest extent provided by law. Suppliers must not subject workers to, or threaten to subject workers to, harsh and inhumane treatment, including but not limited to corporal punishment, mental or physical coercion or verbal abuse, sexual harassment or sexual abuse.
- Not discriminate in hiring and employment practices based on characteristics that are protected by local law. Suppliers will not discriminate against any person because of their skin color, gender, religion, ethnicity or national origin, age, disability or other medical condition, sexual orientation, gender identity, genetic information, pregnancy, marital status, veteran status, political affiliation, union membership or any other basis protected by applicable national or local law. Disciplinary policies and procedures related to these requirements shall be clearly communicated to workers.
- Respect the right to freely associate or collectively bargain in compliance with existing local laws and without discrimination, intimidation or harassment as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, intimidation or harassment.
- Comply with all applicable wage and hour laws, including those relating to minimum wage, overtime hours, and other elements of compensation, and must provide all legally mandated benefits.
- LKQ expects suppliers to regularly monitor working hours to ensure the safety, health, and welfare of workers. In all circumstances, working hours must not exceed the maximum amount permitted by law.
- LKQ does not tolerate the use of child labor. In all circumstances, suppliers must comply with child labor laws.



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- LKQ does not tolerate use of forced, bonded, involuntary indentured prison, trafficked or slave labor. Involuntary labor includes transporting, harboring, recruiting, transferring, receiving, or employing persons by means of threat, force, coercion, abduction or fraud for labor or services. All work must be voluntary, and workers shall be free to terminate their employment at any time.
- Not intentionally source materials from supply chains associated with human trafficking and take reasonable efforts to assure that its own suppliers comply with this requirement.

## Examples of Red Flags

- Failing to comply with laws relating to minimum and maximum wages, overtime, and/or legally mandated benefits
- Sourcing materials from supply chains associated with human trafficking or slavery
- Employing a worker whose employer is withholding wages until a recruitment fee and related interest debt is repaid
- Employer is requiring an employee to surrender a passport or other documentation to guarantee employment.

## How to report concerns

LKQ takes violations of this Supplier Code seriously. If a supplier violates any of the requirements contained in this Supplier Code, LKQ may terminate the relationship. In appropriate cases, LKQ may also refer misconduct to the proper authorities. Suppliers should report known or suspected violations of this Supplier Code.

## Reporting Concerns

You may report any concerns through LKQ Corporation's "Speak Up" Hotline via:

- Phone: 1-800-544-7459 (for calls within the U.S.)
- Online: [www.reportlineweb.com/lkqcorp](http://www.reportlineweb.com/lkqcorp)
- Mail: LKQ Corporation, 500 W. Madison St., Suite 2800, Chicago, IL 60661

Subject to applicable law, you may report concerns anonymously. Please note that the more information you provide, the easier it will be for LKQ to investigate and appropriately respond to your reported concern. Unless otherwise required by local law, LKQ will treat reports confidentially.



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