



LWG Code of Conduct and Ethics

Introduction and Purpose

WHO WE ARE

At Leeds West Groups (LWG), we are dedicated to being a trusted leader in the automotive industry and a top workplace for our team members. We take pride in delivering high-quality work, building strong customer relationships, and creating growth opportunities for our team members. Our culture is founded on values such as safety, integrity, professionalism, and care, which guide how we serve, lead, and work together. These values drive our long-term success and define what it means to be part of the LWG team.

WHO IT APPLIES TO

This Code applies to all LWG team members, regardless of their role, title, or work location, including those in repair facilities, corporate offices, and remote positions. While duties may differ by role, all team members must adhere to the same standards of ethics, safety, and professionalism. Vendors, contractors, and other third parties performing services on behalf of LWG are also expected to follow appropriate standards of conduct while on LWG property or representing our business.

WHY IT MATTERS

This Code of Conduct and Ethics exists to help every team member put our values into action. More than a list of rules, it's a practical, everyday tool for making decisions, building trust, and maintaining a safe, respectful, and high-performing workplace. It empowers team members to act with integrity, take ownership of their impact, and speak up when something doesn't feel right. When we all uphold this Code, we help protect our people, our customers, and the reputation that sets LWG apart.

OUR ETHICAL PRINCIPLES

While policies specify what we must do, ethics guide us on how to do the right thing, especially when the answer isn't clear. Our ethical principles apply to all decisions, actions, and relationships, whether or not they are addressed by a specific policy.

As a LWG team member, you are expected to uphold our ethical values by:

- **Acting with Integrity:** Be honest in your actions and words, even when no one is watching.
- **Using Sound Judgment:** Make thoughtful decisions that align with company values and seek help when unsure.
- **Owning Your Responsibilities:** Keep your commitments, take accountability, and admit mistakes when they happen.
- **Uplifting Others:** Foster an environment where all people feel respected, included, and valued.
- **Protecting What We Stand For:** Safeguard LWG's reputation, data, property, and relationships through ethical behavior.

If you're unsure whether something is ethical, ask yourself the following questions:

- Is it legal?
- Would I feel comfortable if this decision or action became public?
- Am I being fair, consistent, honest, and respectful?
- Could this harm our customers, team, or company?
- Does this decision reflect LWG's values of safety, integrity, professionalism, and care?

If the answer to any of these is "no" or "I'm not sure", pause and ask for help. Your leader or HR is here to support you.

EQUAL EMPLOYMENT OPPORTUNITY



LWG is committed to providing equal employment opportunities to all team members and applicants without regard to race, color, religion, sex, national origin, age, disability, veteran status, genetic information, sexual orientation, gender identity, or any other status protected by applicable federal, state, or local laws. Discrimination of any kind has no place in our workplace.

SUPPORTING POLICIES

This Code works in conjunction with all other company policies, procedures, and expectations. Team members are responsible for reviewing and complying with all applicable LWG policies as communicated by Human Resources or leadership.

Team Member Expectations

At Leeds West Groups (LWG), we expect every team member to uphold the highest standards of conduct in alignment with our values of safety, professionalism, integrity, and customer care. These expectations apply to all roles and locations.

TEAM MEMBERS ARE EXPECTED TO:

- **Act with Integrity:** Demonstrate honesty and fairness in all work activities. Use company time, tools, and resources responsibly.
- **Model Ethical Business Practices:** Conduct all business dealings lawfully, transparently, and with fairness. Avoid bribery, favoritism, conflicts of interest, or any misuse of position. Speak up if you observe unethical behavior, even when it does not violate a specific policy.
- **Comply with Laws and Company Policies:** Follow all applicable federal, state, and local laws, as well as internal policies and procedures, including but not limited to those governing safety, labor, privacy, consumer protection, and the environment.
- **Disclose and Avoid Conflicts of Interest:** Promptly report any outside, financial, or personal interests that could interfere with your responsibilities or decision-making at LWG. This includes outside jobs, competing businesses, or situations where personal benefit could influence your work. Written approval is required before engaging in any activity that may present a real or perceived conflict.
- **Promote an Inclusive and Respectful Workplace:** Treat all individuals with dignity. Create a culture free from discrimination, harassment, bullying, or retaliation.
- **Demonstrate Professional Conduct:** Maintain a respectful, dependable, and courteous presence at work. Your appearance, language, and behavior should reflect positively on LWG. Keep your work area clean, organized, and safe.
- **Use Technology Responsibly:** Use workplace communication tools professionally. Do not use company systems or personal devices to access, share, or store inappropriate, offensive, or unauthorized content. Do not download unauthorized software, disable security features, or bypass company technology safeguards. All team members must follow LWG's data security, password, and cybersecurity protocols to protect company and customer information.
- **Follow Substance-Free Workplace Rules:** Arrive fit for duty. Comply with all drug and alcohol policies, including testing requirements.
- **Protect Company Property and Systems:** Use equipment, vehicles, and technology for work purposes only, unless prior written approval is granted by an authorized supervisor. Secure facilities, cash, vehicles, tools, and data appropriately.
- **Safeguard Confidential Information:** Protect sensitive information and share it only when authorized and necessary for business purposes.
- **Follow All Safety Procedures:** Wear required PPE, report hazards immediately, and participate in all safety training and protocols. Take action to protect yourself and others.
- **Deliver Quality Service:** Ensure inspections, documentation, and repairs are accurate and thorough. Take pride in your work.
- **Support Customer Satisfaction:** Communicate clearly and honestly with customers. Provide solutions that are safe, transparent, and aligned with their needs.
- **Foster Team Collaboration:** Engage respectfully with coworkers. Value diverse perspectives and contribute to shared goals.



- **Embrace Feedback and Growth:** Seek opportunities to learn, accept constructive feedback, and support continuous improvement across the organization.
- **Cooperate with Investigations and Reviews:** Participate fully and truthfully in any company investigation. Protect the integrity of the process.

Prohibited Workplace Conduct

The following behaviors violate LWG policies and values. Any of the below may result in corrective action, up to and including termination of employment.

Strictly prohibited conduct includes, but is not limited to:

- **Illegal or Unethical Activity:** Engaging in theft, fraud, sabotage, bribery, forgery, or any action that violates law or company policy.
- **Falsification of Records:** Altering or falsifying timecards, repair records, financial documentation, health forms, or any official company records.
- **Harassment or Discrimination:** Any form of unlawful harassment, discrimination, bullying, or retaliation based on protected characteristics or personal bias.
- **Off-Duty Misconduct Affecting the Workplace:** Behavior outside of work that compromises safety, violates the law, or damages the company's reputation or ability to operate.
- **Threats or Acts of Violence:** Engaging in verbal threats, physical aggression, intimidation, or unsafe behavior in any work-related setting.
- **Substance Use or Impairment on Duty:** Being under the influence of drugs, alcohol, or impairing substances while on duty or company property.
- **Safety Negligence:** Failing to follow safety procedures, neglecting PPE use, ignoring hazards, or engaging in reckless or unsafe acts.
- **Destruction or Misuse of Property:** Damaging or improperly using company or customer property, tools, or digital systems. Unauthorized access or tampering with security systems is also prohibited.
- **Cash Handling and POS Violations:** Skipping required steps for vehicle release, mishandling transactions, or violating cash handling or point-of-sale procedures.
- **Insubordination:** Refusing lawful and reasonable work assignments, ignoring supervisor instructions, or displaying disrespectful or defiant behavior.
- **Inappropriate Use of Time:** Sleeping on duty, excessive loitering, horseplay, misuse of personal devices, or engaging in non-work activities during scheduled work hours.
- **Attendance Violations:** Excessive tardiness, absenteeism, unauthorized leave, or failure to return from breaks without valid reason.

Responsibility to Uphold

Every team member plays a part in maintaining a safe, ethical, and respectful workplace. Upholding this Code requires active participation, sound judgment, and accountability at all levels.

INDIVIDUAL ACCOUNTABILITY

Each team member is expected to:

- Understand and follow the Code and all applicable policies.
- Use sound judgment when the right course of action is unclear.
- Ask for guidance when unsure about a policy or decision.



- Take responsibility for their actions and conduct.

DUTY TO REPORT

All team members have a responsibility to report:

- Violations of this Code or company policies.
- Unsafe conditions or workplace incidents.
- Unethical or unlawful behavior.

Failure to report known violations or concerns may result in corrective action. Reporting protects our workplace and ensures consistent accountability.

LEADERSHIP EXPECTATIONS

Supervisors and managers are expected to:

- Lead by example and model company values.
- Create a respectful, inclusive, and safe workplace.
- Enforce standards consistently and fairly.
- Respond promptly to concerns or violations.
- Encourage team members to speak up without fear.

Inaction, favoritism, or failure to address misconduct may be considered a violation of this Code and subject to corrective action.

CONSEQUENCES OF VIOLATIONS

Violations of this Code or related policies may result in corrective action, up to and including termination of employment. Leaders may face additional consequences for failure to enforce or uphold the Code appropriately.

Reporting Concerns and Violations

OUR OPEN-DOOR CULTURE

LWG fosters a workplace where questions and concerns can be raised freely and constructively. You do not need to wait for a major issue. Your voice is always welcome and encouraged. Support is available and confidentiality will be maintained to the extent possible.

WHEN TO SPEAK UP

Team members are expected to speak up if they:

- Witness behavior that may violate this Code, other company policies, or the law.
- Observe unsafe working conditions or hazards.
- Experience or witness harassment, retaliation, or discrimination.

Raising concerns early protects our workplace and allows issues to be addressed constructively and fairly.

WHERE TO REPORT

Team members may report concerns to:

- A direct supervisor or manager.
- Human Resources (<https://leedswestgroups.happyfox.com/new/>)
- Any designated LWG reporting channel.



- Another trusted LWG leader.

NO RETALIATION POLICY

LWG strictly prohibits retaliation against any team member who:

- Raises a concern in good faith.
- Participates in an investigation or audit.
- Requests guidance about a policy or ethical issue.

Retaliation includes demotion, termination, exclusion, harassment, or other adverse actions. Any retaliation will result in disciplinary action.

WHISTLEBLOWER PROTECTIONS

LWG complies with all applicable whistleblower protection laws. Team members who report suspected legal violations, safety concerns, unethical behavior, or policy breaches in good faith are protected from retaliation under company policy and applicable law. Retaliation against whistleblowers is strictly prohibited and will result in corrective action.

Policy Rights and Revisions

Leeds West Groups (LWG) reserves the right to interpret, revise, or discontinue this Code of Conduct and Ethics at any time, consistent with applicable laws and business needs. This code does not establish a contract of employment or change the at-will nature of employment with LWG. Unless explicitly stated in a written agreement signed by an authorized company representative, all employment with LWG is at-will. This means that either the team member or the company can end the employment relationship at any time, with or without notice or cause.

Acknowledgment

I understand and agree to the following:

- I will comply with the Code of Conduct and Ethics and all LWG policies, procedures, and protocols relevant to my role.
- I understand that violations may result in corrective action, up to and including termination of employment.
- I have a responsibility to report violations of this Code, other company policies, or applicable laws.
- I can report concerns through my supervisor, Human Resources, or other designated channels.
- I may bypass my supervisor and report directly to Human Resources or another trusted leader if needed.
- I am protected from retaliation for raising concerns or participating in an investigation in good faith.
- I understand that policies may be updated, and I am responsible for staying informed.
- I agree to use sound judgment and seek guidance when I have questions.
- I commit to fostering and positively contributing to a respectful, safe, and professional workplace.
- I have had the opportunity to ask questions about the Code of Conduct and Ethics and understand how to seek clarification.
- I understand that this Code of Conduct and Ethics does not change the at-will nature of my employment.

By signing below, I confirm that I have received, read, and understand the Leeds West Groups (LWG) Code of Conduct and Ethics. I acknowledge that I am responsible for following the standards and values outlined in this Code, and I commit to upholding them in my daily conduct. I understand that maintaining a respectful, safe, and ethical workplace is a shared responsibility, and I agree to act with integrity, seek guidance when needed, and support a culture of accountability and trust.

Team Member Name (Printed)

Team Member Signature

Date