

CDK GLOBAL®

Global Supplier Code of Business Conduct and Ethics

March 3, 2023

CDK Global Fundamentals

- Always act with integrity
- Use good judgment and common sense
- Treat others with respect and dignity
- Comply with this Code, CDK policies, and the law at all times
- Ask for help if you have questions
- Be accountable for your action
- Report anything that doesn't seem right

Questions

Any questions regarding the Global Supplier Code of Business Conduct and Ethics can be directed to the CDK Ethics and Compliance Office by emailingethics@cdk.com or the CDK Ethics Hotline at cdkglobal.ethicspoint.com.

Reporting Concerns

If you are concerned that an actual or potential violation of this Code has occurred or have questions about how this Code applies, there are several ways to address your questions or report your concerns. You may contact:

- The CDK Ethics Office at ethics@cdk.com
- The CDK Ethics Hotline at cdkglobal.ethicspoint.com
- The CDK Legal Department
- The relevant person within your organization responsible for ethics and conduct

Ethics Hotline

The CDK Ethics Hotline is available 24/7 to CDK Suppliers worldwide to help answer your questions on business conduct and ethics issues, policies, regulations, and compliance with legal requirements. It also allows you to advise CDK of situations that may require investigation or management attention. CDK will not retaliate—and will not tolerate retaliation—against any individual for reporting a concern in good faith with the CDK Ethics Hotline. Anonymous reporting is available through the hotline (except where your identity is necessary for the investigation). Additional information on contacting the CDK Ethics Hotline is available at cdkglobal.ethicspoint.com.

CDK Global, Inc. and its subsidiaries' ("CDK" or "Company") reputation for service, quality and fair dealing is coupled with CDK's commitment to its values of integrity, social responsibility and legal compliance. CDK has built a culture of compliance, honest business conduct and solid business ethics. Our standards can be met only with the cooperation of our agents, consultants, contractors, and suppliers ("CDK Suppliers").

Acts or omissions contrary to the principles of business ethics as enshrined in this Code by CDK Suppliers can damage CDK's business and reputation. CDK is providing this Global Supplier Code of Business Conduct and Ethics ("**Code**") to CDK Suppliers in an effort to ensure that the expectations and standards upheld at CDK are understood and adhered to.

CDK encourages CDK Suppliers to review the Code carefully, become familiar with its content and draw guidance, and understand CDK's expectations of ethical and responsible behavior. Moreover, CDK expects all of its suppliers to adhere to similar or better standards to conduct their business ethically.

Scope of Application

CDK Global is committed to high standards of integrity. Moreover, CDK Global has a 'zero tolerance' policy when it comes to unethical business behavior, such as bribery and corruption. As a CDK Supplier, you must comply with all applicable laws and regulations in the relevant jurisdiction, as set out in this Code and any other applicable CDK Global code(s)/policy(ies)/rule(s) that may be prescribed from time to time as well as your contractual obligations to CDK Global.

The Code is applicable to all CDK Suppliers, their personnel, their sub-contractors, and any third parties from whom the CDK Supplier procures to perform services and/or provide products on CDK Global's behalf, throughout

the world. As a CDK Supplier, you agree to abide by the terms of this Code and acknowledge that compliance with this Code is required for your continued status as a CDK Supplier. It is important that CDK Global Suppliers are aware of the obligations and philosophy set forth in this Code and adhere to them. To ensure such adherence, the measures and conduct expected from CDK Suppliers are expressly set out in this Code.

I. COMPLIANCE WITH LAWS, REGULATIONS AND THE CODE

CDK requires that all CDK Suppliers comply with all laws and regulations applicable to their business wherever conducted, and with the Code. Moreover, CDK expects its suppliers to adhere to any additional CDK Global codes, rules and policies that CDK subsequently adopts and communicates to CDK Suppliers from time to time.

Compliance means not only observing the law, but also conducting corporate business in a way that recognizes your ethical responsibilities and fulfills them. Where local laws are less restrictive than this Code, the CDK Supplier must comply with the Code, even if such conduct would otherwise be legal. If local laws are more restrictive than the Code, you as a CDK Supplier must, at a minimum, comply with those laws. CDK expects CDK Suppliers to adhere to high ethical standards and to avoid engaging in any activity that involves even the appearance of impropriety.

Financial Integrity

CDK Suppliers must accurately document all transactions related to its relationship with CDK (including without limitation contracts, order forms and purchase orders), in their financial books, records and statements, and in other documents provided to CDK. Any contractual variations, additional provisions or agreements should be properly documented and intimated to CDK within a reasonable time frame. Contractual agreements including variations shall only be executed by those persons with proper authority.

The handling and disbursement of funds related to CDK business transactions must be pursuant to a duly authorized written CDK contract executed by the Vice President of CDK Global Procurement or such CDK employee has specifically designated and authorized to execute contracts on his/her behalf by the VP of CDK Global Procurement through appropriate means with clearly defined procedures as well as an accompanying purchase order, where applicable. No undisclosed or unrecorded fund or asset relating to any CDK transaction may be established or maintained for any purpose.

As a CDK Supplier you must not make or promise to make improper payments of money or anything of value, directly or indirectly, to any government or public international organization officials, political parties, or candidates for political office, or any company director, officer, employee, or agent of a commercial customer or supplier, for the purpose of improperly obtaining or retaining business or securing any improper advantage.

Gifts, Entertainment and Travel

In your dealings with CDK, you must use discretion and care to ensure that expenditures on or by CDK personnel or representatives are permitted under this Code and the CDK Anti-Bribery & Corruption Policy (see attached) and could not reasonably be construed as bribes or improper inducement or otherwise violate applicable laws and/or regulations. When traveling and conducting business on behalf of CDK, CDK Suppliers are expected to follow the CDK Global Travel Expense Reimbursement Policy.

Gifts to CDK employees, no matter how well-intentioned, might constitute a bribe under certain circumstances and/or create conflicts of interest. Do not offer anything of value to obtain or retain a benefit or advantage for the giver, and do not offer anything that appears to influence, compromise judgment or obligate a CDK employee. Any gift must be permissible under the CDK policies referenced above. Any gifts, meals or entertainment must comply with applicable law, must not violate the giver's and/or receiver's company policies.

Antitrust and Competition Laws

Many countries, have laws and regulations, usually referred to as antitrust or competition laws prohibiting unlawful restraint of trade. CDK Suppliers must comply with these laws, as applicable.

These laws vary from country to country, but, generally, such laws prohibit agreements or actions that reduce competition; prohibit agreements or understandings among competitors to fix or control prices; boycott specified suppliers or customers; divide or allocate markets or customers; or limit the production or sale of products or product lines for anticompetitive purposes.

CDK is committed to observing rigorously the applicable antitrust or competition laws of all countries in which it conducts business. CDK Suppliers must never engage in such practices or discussions of such matters with CDK, other CDK partners, or representatives of other companies. CDK also prohibits the use of unfair methods of competition and deceptive practices such as making false or misleading representations about products or services, making product or service claims without facts to substantiate them.

Respect for Proprietary Rights

CDK respects the intellectual property rights of others and expects other companies to respect CDK's intellectual property rights. CDK Suppliers must respect the intellectual property of CDK and not use CDK's patented technology or reproduce copyrighted software, trademarks, documentation, or other materials without written permission. In the course of working with or for CDK, a CDK Supplier must not use proprietary information, patented technology or copyrighted software, documentation, or other materials of third parties without authorization. In the event CDK discovers that such intellectual rights

of any third party has been utilized without proper authorization, then, the CDK Supplier must indemnify CDK against all loss, third party claims, damages, injury emanating out of such unauthorized usage of the and without prejudiced to any of its rights under laws and under contract. CDK shall also be entitled to terminate the underlying contract with CDK Supplier, if determined necessary and appropriate by CDK.

Protection of Confidential Information

CDK Suppliers are required to protect confidential information (including “personal identifiable information”) to which a CDK Supplier has access to in connection with the provision of its products and/or services to CDK. The CDK Supplier must safeguard confidential information by not transferring, publishing, using, or disclosing such information except as is necessary to perform contracted services or as directed or authorized by CDK in writing. Materials containing confidential information or protected by privacy standards must be handled in accordance with those requirements set forth in a contract that CDK Global Supplier has in place with CDK as well any applicable standards and laws. At a minimum, confidential information must be stored securely and shared only with those CDK Supplier personnel on a need-to-know basis.

When requested by CDK, CDK Suppliers are required to enable an evaluation by the CDK Global Security Organization to be carried out to ensure appropriate policies, security standards and procedures are followed by CDK Suppliers when accessing, processing, or managing CDK confidential information, CDK networks, or a CDK customers’ networks.

The CDK Supplier shall restrict access to the CDK confidential information to their employees, accountants, auditors or any professional advisors or consultants who in each case shall need such access for the purpose of compliance with any legal or contractual or regulatory obligation or audit review or verification or legal proceedings.

In the event if any breach of this confidentiality obligation, the CDK Supplier shall be liable to indemnify CDK against all loss, third party claims, damages, injury emanating out of such breach.

Securities and Insider Trading Laws

CDK Suppliers are required to comply with all applicable United States and foreign insider trading and securities laws governing transactions in the securities of CDK. These laws prohibit the use of material, non-public information for personal advantage and from disclosing this information to any other person before it is publicly available.

If a CDK Supplier possess material, non-public information, you as a CDK Supplier may not trade in CDK securities or the securities of another company to which the information pertains. CDK Suppliers may not engage in any action to take advantage of or pass on to any person(s) (i.e. "tip") material information gained through its relationship with CDK until such information has been disclosed to the general public.

Compliance with Export/Import Laws

CDK requires that CDK Suppliers comply with all applicable U.S and other applicable foreign export/import laws or any applicable international trade regulations or bilateral treaties.

Failure to comply could result in the loss or restriction of CDK Supplier's or CDK's export/import privileges. As a CDK Supplier you are responsible for understanding how the export control laws apply to you and the contractual relationship CDK Supplier has with CDK and for conforming to these laws and to ensure no direct or indirect exports/imports are made in violation of these laws or will be used for any purpose prohibited by these laws.

Economic Boycotts

CDK Suppliers must not participate directly or indirectly in any economic boycott not sanctioned by the U.S. or another relevant government. CDK Suppliers must not provide information that could be construed to support any such unsanctioned boycotts.

Conflicts Of Interest

The term "conflict of interest" describes any circumstance that could cast doubt on CDK's Supplier ability to perform and contract with CDK that raises a question of whether any actions, judgements and/or decision-making could compromise either CDK or the CDK Supplier. CDK expects CDK Suppliers to be free from any conflicts of interest. Conflict of interest situations may arise in many ways. If a CDK Supplier believes that there is an actual or potential conflict with CDK or any CDK employees, the CDK Supplier is expected to communicate all pertinent details to CDK at the earliest. Furthermore, the CDK Supplier shall undertake all reasonable efforts to remove such conflict of interest at the advice of CDK.

Human rights

As a supplier to CDK Global, you shall respect the personal dignity, privacy and rights of each individual, refuse to make any person work against his or her will; and prohibit behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

Health, Safety and Environmental Management

CDK Suppliers shall provide a safe and healthy workplace for all of its employees and shall conduct business in an environmentally sustainable way. In particular,

CDK Suppliers will formally appoint a competent person to manage health, safety and environmental programs and improvements.

CDK Suppliers shall also establish appropriate organizational structures and procedures for the effective management of health, safety and environmental risks and ensure that all workers are sufficiently aware of these risks and appropriately trained on the implementation of control measure. Moreover, CDK Supplier shall ensure that its own suppliers comply with the above stated health, safety and environmental requirements.

Fair Labor Conditions and Child Labor

CDK Suppliers shall ensure fair labor conditions. In particular, CDK Suppliers will refrain from employment discrimination based on gender, age, ethnicity, nationality, religion, disability, union membership, political affiliation or sexual orientation. CDK expects its CDK Suppliers to not tolerate or use child labor in any stage of its activities other than in accordance with all applicable laws and regulations and make no use of any forced labor or involuntary prison labor and allow all employees the choice to leave their employment freely upon reasonable notice. Moreover, CDK expects its suppliers to compensate its employees fairly and follow local wage regulations and also fulfill their responsibilities under the social security and employee welfare legislations including in respect of Provident Fund, Employees State Insurance, Minimum Wages, Payment of Wages etc., aimed for the benefit of the CDK Supplier employees.

Procurement by supplier

As a CDK Supplier, you must under all circumstances procure goods and services in a responsible manner. In particular, you will select your own tier one suppliers providing goods or services directly or indirectly to CDK based on them agreeing to adhere to standards comparable to those set forth in this Code. Moreover, the CDK Supplier needs to make sure that its suppliers comply with the standards agreed under this Code to avoid delivery of goods or services that are in breach of this Code.

Environmental Management

CDK expects its suppliers to comply with all applicable laws, regulations and standards of the country where they are doing business and conduct their business and operations in a way that minimizes their impact on the environment. The CDK Supplier should ensure that their suppliers and sub-contractors are also complying with the principles of this Code. CDK Suppliers are expected to adopt practices that deliver benefits to their own operations and supply chains and improve their and our sustainable performances over time. CDK Suppliers should also actively participate in projects that contribute towards making a difference to the environment.

II. GENERAL CONTRACTING ISSUES

CDK expects CDK Suppliers to compete fairly and ethically for all business opportunities. CDK Supplier employees who are involved in the sale or licensing of products/services, the negotiation of agreements, or the delivery of services to CDK are expected to understand and honor the terms of any CDK Supplier contractual agreements. CDK Suppliers are required to ensure that all statements, communications, and representations to CDK are complete, accurate and truthful.

Dealing with Government

CDK Suppliers must strictly observe the laws, rules, and regulations that govern the acquisition of goods and services by any governmental entity of any country and the performance of government contracts where it is providing such goods and/or services. If the CDK Supplier engages with any governmental entity in connection with CDK Supplier's relationship with CDK, you as the CDK Supplier is responsible for learning and complying with all rules that apply to government contracting and interactions with government officials and employees. The CDK Supplier must also assure compliance with all applicable legislations and adhere to stipulations of standards and certification schemes the relevant government is committed to.

Lobbying of Government Officials

Lobbying is generally any activity that attempts to influence laws, regulations, policies, and rules. In certain jurisdictions, however, the legal definition of "lobbying" can also cover procurement and business development activity. CDK Suppliers may not lobby any government official on behalf of CDK unless specifically retained by CDK for that purpose through a written agreement.

III. REPORTING VIOLATIONS

CDK Suppliers must report issues associated with ethics and/or conduct to CDK, including conduct of any CDK employee, that CDK Supplier reasonably believe to be in actual, apparent, or potential violation of this Code. CDK will seek to handle all such matters confidentially.

Such matters can be reported to the CDK's Ethics Hotline by emailing cdkglobal.ethicspoint.com or contact the CDK Ethics Office at ethics@cdk.com