

## CODE OF ETHICSAND BUSINESS CONDUCT











## TABLE OF CONTENTS

- O3 A MESSAGE FROM OUR CEO
- O4 WHY WE HAVE A CODE OF ETHICS AND BUSINESS CONDUCT
- OUR VISION, MISSION AND CULTURAL BELIEFS
- **05** EXPECTATIONS FOR TEAM MEMBERS
- **06** WE SPEAK UP
- **08** KEY PRINCIPLES OF THE CODE

### HOW WE DELIVER WITH CARE, SPEED AND PURPOSE

### WE ARE HONEST AND CONDUCT BUSINESS FAIRLY AND WITH INTEGRITY

- Conflicts of Interest
- 12 Gifts, Meals and Entertainment
- 14 Anti-Corruption and Anti-Bribery
- 16 Fair Dealing
- 18 Third Parties
- 19 Insider Trading and Regulation Fair Disclosure
- 20 Trade Compliance and Anti-Money Laundering

### WE DEMONSTRATE CARE FOR OTHERS AND OUR COMMUNITY

- 23 Fair and Respectful Workplace
- 25 Health and Safety
- 27 Human Rights
- 29 Communicating Externally
- 31 Charitable Donations and Political Activities
- 33 Environment

### **WE PROTECT OUR ASSETS**

- 36 Accounting and Financial Controls
- 38 Company Assets
- 40 Confidential Information
- 42 Data Privacy

### **ADDITIONAL INFORMATION**

45 Contact Information for Your Ouestions or Concerns

### A MESSAGE FROM OUR CEO

At Advance Auto Parts, we stock hundreds of thousands of parts, but you—our team members—are our best part. Our success is driven by **what** you do for our company—and **how** you do it.

Our Code of Ethics and Business Conduct and supporting policies and procedures let team members know how to make decisions and take actions that are ethical, legal and aligned to our company Vision: Advancing a World in Motion.

As you review our Code, think about how you can use it in your daily interactions. By following these standards, you will show how you Care—about each other, our customers, our suppliers, our society, the environment and the laws that govern us. You also will demonstrate the integrity that the company expects from our team members.

By making good choices grounded in Advance's standards and Cultural Beliefs, we will be able to maintain our excellent reputation and continue to deliver on our Mission:

Passion for Customers...Passion for Yes!

Thank you to all of our team members around the globe and across all our banners for taking the time to Be Accountable and learn about your responsibilities under our Code.

J.L. oken

Shane O'Kelly
President and Chief Executive Officer



## WHY WE HAVE A CODE OF ETHICS AND BUSINESS CONDUCT

Our Code of Ethics is like a car owner's manual. It explains how we operate. This includes how we succeed in the industry and interact with our customers, suppliers and each other. These standards align with our Vision, Mission, Cultural Beliefs and legal and ethical standards.

Our Code shows our customers, fellow team members, suppliers and business partners that integrity is as important to our business as brakes, spark plugs or DieHard® batteries. We can Advance a World in Motion when we use the Code to guide our actions.

Our Code applies to all of us. It does not matter what banner (Advance, Autopart International, Carquest or Worldpac), function or country we work in, what job we hold or our level in the company. Wherever in the world we work, we are held accountable for understanding and following the Code, company policies and procedures and the laws that apply to us. We also expect our officers and directors to be aware of and follow the Code.

Our reputation rests on each of us following our high ethical standards.

Our Code includes the following elements, which will help you turn it from words on a page into actions you can take.

- Step on the Gas describes actions that follow our Code, while Hit the Brakes
  describes actions that would violate it.
- Check Your Alignment applies our Code to real-life examples.
- Look Under the Hood lists resources to learn more about a topic.

## **OUR VISION, MISSION AND CULTURAL BELIEFS**

In addition to the Code, team members are expected to comply with all applicable government laws and regulations (e.g., country, federal, provincial, state and local). This Code does not replace the Team Member Handbook. If you need further guidance on a particular issue, speak with management, Human Resources, or Ethics and Compliance.

### **VISION**

Advancing a World in Motion

### **MISSION**

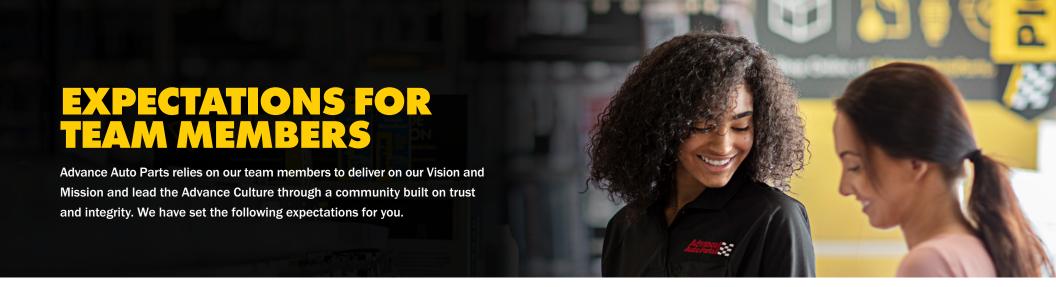
Passion for Customers...Passion for Yes!

### **CULTURAL BELIEFS**

We Lead the Advance Culture through a community built on **trust** and **integrity**, since 1932.

The company's culture is how we think and act. We are all owners of and accountable for our company culture. Having clearly identified beliefs helps us understand the behaviors we should exhibit when we come to work. These are the behaviors that make Advance a great place for our team to work and a great place for our customers to shop.

- Speak Up #CourageToSolve
- Be Accountable #OwnAndOvercome
- Take Action #TogetherWithSpeed
- Grow Talent #InspireServeGrow
- Move Forward #LeadBoldChange
- Champion Inclusion #WeAllBelong



### AS TEAM MEMBERS, WE ARE ALL EXPECTED TO FOLLOW THE CODE.

#### **Live Our Mission And Cultural Beliefs**

Ensure that your actions demonstrate Advance's Mission and Cultural Beliefs.

### **Understand And Follow Our Code, Policies And Procedures**

Use our Code, policies, procedures and other tools to guide your actions and decisions.

### Seek Guidance

Seek help if you are not sure of the right thing to do and Speak Up about concerns. Talk to management, Human Resources, Asset Protection, Ethics and Compliance, or contact our Team Member Hotline.

### **Hold Each Other Accountable**

Hold each other accountable for following Advance's Code and other standards. Use one of the options in our Open Door Policy to Speak Up if you have a concern.

### PEOPLE FIRST IN WHAT WE DO AND HOW WE DO IT.

### WE EXPECT OUR MANAGERS TO LEAD.

### **Set Your Expectations**

Make clear your expectations that team members follow our Code, policies and procedures.

### **Lead By Example**

Show your commitment to Advance's Code and Cultural Beliefs by living them—not just talking about them.

### **Recognize The Right Behaviors**

Celebrate actions and decisions that align to our Code and other standards. Promptly address any wrong behaviors.

### **Have An Open Door**

Ensure that team members feel comfortable coming to you to share their concerns. Address any concerns appropriately and quickly.

### **Protect Against Retaliation**

Look out for potential retaliation against team members who have raised a concern, and never retaliate yourself.

### **WE SPEAK UP**

Because our company's reputation depends on the actions we take individually as team members, you must Speak Up if you have a question or a concern.

### REPORT IN GOOD FAITH

We expect team members to report their concerns in "good faith." This means sharing information that you honestly and sincerely believe to be true—even if it turns out not to be.

### NEVER RETALIATE

Retaliation is when a team member or management takes a negative action or discriminates against a team member who reports a concern or engages in a legally-protected activity. Retaliation could include excluding someone from team meetings or lunches, giving them undesirable work assignments and demoting or terminating the person because they spoke up or participated in an investigation.

### SPEAKING UP SHOWS COURAGE

Speak Up if you suspect a violation of our Code, Team Member Handbook, policies or procedures. You have multiple options for this:

- 1. Discuss the concern with your manager, or
- 2. Contact the next level of management, senior management or Human Resources, or
- 3. Contact the Team Member Hotline. Scan the QR code or visit <a href="https://www.ethicspoint.com">www.ethicspoint.com</a> to make a report online or for a list of phone numbers. You can choose to remain anonymous if you use the Hotline.

### RETALIATION IS NOT TOLERATED

We have a strict non-retaliation policy that protects team members who:

- Raise a concern in good faith.
- Ask a question or seek advice about a business practice, decision, action or company policy.
- Participate in an investigation.

If you believe you have been retaliated against, contact Human Resources or the Team Member Hotline.

### **LOOK UNDER THE HOOD**

Open Door Policy | Escalation and Investigations Policy



### WHAT HAPPENS NEXT?

When a team member Speaks Up, the company Takes Action. These are the steps we take, as appropriate, to investigate a potential violation of our Code of Ethics or company standards.

### ASSIGN INVESTIGATOR

We decide who should investigate the concern. For example, Asset Protection may look into a theft allegation and Human Resources may investigate a concern about harassment.

### REVIEW EVIDENCE

We look at relevant evidence relating to the concern, such as videos, time clock punches, work schedules, internet searches, emails, etc.

### **CONDUCT INTERVIEWS**

We interview relevant team members, including anyone accused of wrongdoing.

### CONCLUDE AND CORRECT

We decide if the concern is valid and then correct the issue as needed.



My manager asked me to do something that violates a company policy. What should I do?

Ask your manager a clarifying question to make sure you understand the request. If you still believe the request is against our policies, respectfully say, "No," and explain why.

You also should talk to the next level of management, senior management, Human Resources, Ethics and Compliance, or contact the Team Member Hotline to report the request to violate a company policy.

Advance does not tolerate retaliation for concerns raised in good faith. This means that the company will not allow your manager or another team member to take negative or discriminatory action against you because you spoke up.

### **EXAMPLES OF CORRECTIVE ACTION**

The company will take corrective action when we determine that a team member has violated our policies. The action we take depends on the type of violation and if the team member has broken company rules before. Because we hold our managers to a higher standard, we also may consider the job level or role of the team member. These are some of the corrective actions we may take.

- Coaching or counseling
- Verbal warning
- Written letter of concern or warning
- Transfer or demotion
- Termination

The performance rating or promotability of team members who do not follow our rules also may be negatively impacted.

## **KEY PRINCIPLES OF THE CODE**

As a leader in the automotive aftermarket industry, there are hundreds of laws and regulations we must follow. They may apply globally or locally. They may include rules on how to treat people, care for the environment or compete fairly. These rules align with our key principles.

### **KEY PRINCIPLES**

- We are honest and conduct business fairly and with integrity.
- We demonstrate care for others and our community.
- We protect our assets.

These principles apply to Advance as a company and to you as a team member. When we follow these key principles, we follow the law and behave ethically and with integrity, as we have done since 1932.

### **DO A DIAGNOSTIC CHECK**

Our Code cannot cover every situation that our team members may face. You can use these questions as a framework to help when the right action is not clear. Always ask first:

- Is the action legal?
- Is there a specific policy or procedure you can use to guide your decision? If not, ask yourself the following:
  - Does the action follow the key principles in our Code of Ethics?
  - Does the action demonstrate my integrity, honesty and commitment to doing the right thing?
  - Is the action in the best interests of the company, our customers or our team members?
  - Would I feel okay if everyone knew about the action I am thinking of taking?

If you answer "No" to any of these questions, hit the brakes! If you are not sure, depending on the topic, talk to management, Human Resources, Asset Protection, Environmental Health and Safety (EHS) or Ethics and Compliance for help.

### WE ARE HONEST AND CONDUCT BUSINESS FAIRLY AND WITH INTEGRITY

- 10 CONFLICTS OF INTEREST
- 12 GIFTS, MEALS AND ENTERTAINMENT
- 14 ANTI-CORRUPTION AND ANTI-BRIBERY
- 16 FAIR DEALING
- **18** THIRD PARTIES
- 19 INSIDER TRADING AND REGULATION FAIR DISCLOSURE
- 20 TRADE COMPLIANCE AND ANTI-MONEY LAUNDERING



## AVOID AND REPORT CONFLICTS OF INTEREST

### **CONFLICTS OF INTEREST**

Do not let your personal interests impact your business decisions and disclose any potential or actual conflicts of interest.

We expect our team members to base their business decisions on the best interests of Advance and its stockholders—not on personal considerations or relationships. We require team members to disclose any actual or potential conflicts of interest.

You must ensure that your personal, business or financial interests do not conflict with Advance's interests. It is impossible to list all potential conflicts of interest but here are a few examples. Report any actual or potential conflicts to your manager and Ethics and Compliance.

- You have an association with a competitor or a customer, such as a job, ownership interest or family relationship.
- You use your role at the company for personal gain or profit, such as to promote a side business.
- You have a romantic relationship with someone in your chain of command.
- You select or manage a supplier that is owned by a family member or friend.
- You hold a Board position on a company or non-profit organization that does business with or seeks charitable contributions from Advance or the Advance Foundation.



Remember that appearances matter. If it looks like a conflict—even if it is not—it could hurt your or the company's reputation. If you are unsure of a conflict, ask yourself these questions.

- Could it appear to influence my objectivity or business decision?
- Could I gain personal benefit from my involvement in the situation? Could a friend or family member?
- Could the activity interfere with my ability to do my job?
- Could it seem like I am putting my interests ahead of the company's?

If you answer, "Yes" or "Maybe" to any of these questions, talk to Ethics and Compliance. Many conflicts of interest can be resolved. However, you must disclose the potential conflict before we can resolve it.



A General Manager (GM) and a Retail Parts Pro (RPP) who work in the same store are dating. Do they need to disclose this romantic relationship?

Yes. It is a conflict of interest for a GM to be in a romantic relationship with someone in her reporting line.

A Commercial Accounts Manager (CAM) supports an automotive repair shop owned by his brother-in-law. Is this a potential conflict of interest?

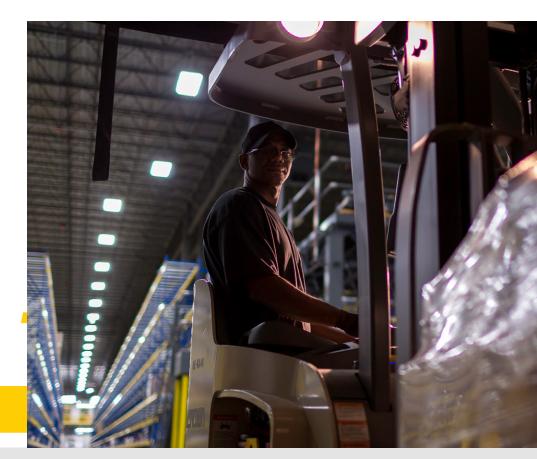
Yes. The CAM must tell his manager and Ethics and Compliance about this relationship, so another CAM can support the account and avoid the conflict of interest.

A consultant that does work for Advance assigned one of its employees, who is also my close friend, to work on a project in my department. I am on the project team. Is this a conflict?

It depends on the circumstances. You must report this relationship so the company can assess and address the conflict if necessary.



We do not take advantage of business opportunities that are intended for the company but not team members individually. For example, we may not take advantage of special supplier discounts available to Advance unless they are offered through an Advance-sponsored team member discount program. We may not buy merchandise directly from the company's suppliers for personal use. We may not accept a free or discounted service from a customer, such as parts installation, if not offered to all team members.



## ACCEPT AND OFFER BUSINESS COURTESIES WITH CARE

### GIFTS, MEALS AND ENTERTAINMENT

Before you offer or accept a business courtesy, consider why it is being offered and if it could appear to unfairly influence a business decision.

We recognize that modest and appropriate business courtesies can be an important part of building and maintaining business relationships. However, we are conscious that these courtesies—if frequent or excessive—may bring objectivity into question and can seem like they are being given with the expectation of getting something in return.

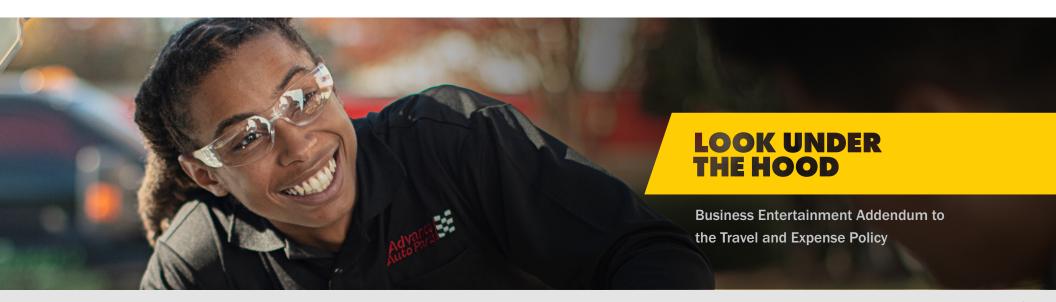
You may not offer or accept gifts, meals or entertainment in a way that could be seen to compromise a business decision. Some gifts, such as cash, are never acceptable. You must politely decline or return prohibited gifts and let your manager know. With proper approval, you may be able to donate certain gifts to a company-designated charitable, civic or educational organization.

Certain laws prohibit a government official from accepting a gift or hospitality—however small. Do not offer or provide any business courtesies to government officials worldwide unless you have written approval from Advance's General Counsel or Chief Compliance Officer.

If you interact with our professional customers, follow these principles when offering business courtesies:

Grow your sales on the quality of our products and service—not based on the
quality or frequency of the gifts you provide. Do not offer inappropriate gifts or
other business courtesies to improperly influence business decisions.

Understand and follow applicable company policies related to customer gifts, meals, trips, etc. When in doubt, seek guidance from management or Ethics and Compliance.





### WHAT WE EXPECT

Remember these rules if you are offered a business courtesy:

- You may accept meals, gifts or entertainment if they are infrequent, inexpensive
  and serve a legitimate business purpose. Such items must not influence—or
  appear to influence—any business decision. You must make your manager
  aware of the business courtesy.
- In certain situations that comply with the above, and only with prior approval, you
  may accept tickets or trips-such as to car races, ball games, golf or boating events.
- You may take part in legitimate sales or product-related contests sponsored by Advance or our suppliers if you have prior approval.
- If you are unsure, ask your manager or reach out to Ethics and Compliance.



### WHAT WE PROHIBIT

Never engage in this type of behavior:

- · Do not ask a third party for a business courtesy.
- Do not offer or accept a business courtesy that exceeds the limit set in our policies.
- Do not offer or accept cash.
- Do not offer or accept a gift from a government official or a union official.
- Do not request or accept product samples for personal use.
- Do not offer or receive a business courtesy during or close to contract bids or renewals.



As a thank you for great service, a customer offered a gift card to the Retail Parts Pro (RPP) who helped him. It is for \$15 at a local coffee shop. Can the RPP keep the gift card?

No. While we are proud that this team member offered such great service, it is never appropriate to accept gifts or "tips," even small ones, from customers. The RPP should politely decline the gift card and let their manager know.

A vendor offers to take some team members out for a day of racing instruction at a local track. Is this an acceptable offer?

It depends. The cost of this entertainment may exceed the allowed limit. We need to assess certain factors, such as whether there is a legitimate business purpose, whether we have an open bid with the vendor and which team members are participating. Discuss this offer with management and Ethics and Compliance before accepting.

The housekeeping vendor for the Global Capability Center (GCC) told the Advance contact they would clean her mother-in-law's house as a thank you gift for a contract renewal. The vendor will bill the charges for the personal service to Advance. Is this an acceptable offer?

No. This "gift" is an improper bribe. This offer should immediately be reported to management and Ethics and Compliance.

## **DO NOT OFFER OR ACCEPT BRIBES**

## ANTI-CORRUPTION AND ANTI-BRIBERY

Win and grow our business because of the strength of our products, service and reputation—not because you offer bribes or improper benefits.

We want to grow our business and profitability—and we want to do it with integrity. Bribery or other corrupt practices do not demonstrate integrity. The company will not tolerate corrupt behavior, even if it means losing out on business.

The rules here are simple:

- Do not offer, promise, give or accept a bribe.
- Do not use a third party to offer, promise, give or accept a bribe on our behalf.

When people think of bribery, they may think of an envelope of cash. But a bribe can be anything of value offered to improperly gain or retain business, unfairly seek a benefit for Advance or avoid an action that would be bad for us.

Facilitation payments are a type of bribe. These are small payments or inexpensive gifts made to individual government officials to speed up or have them perform routine government actions, like issuing a license or releasing goods at the border. Facilitation payments are not allowed.

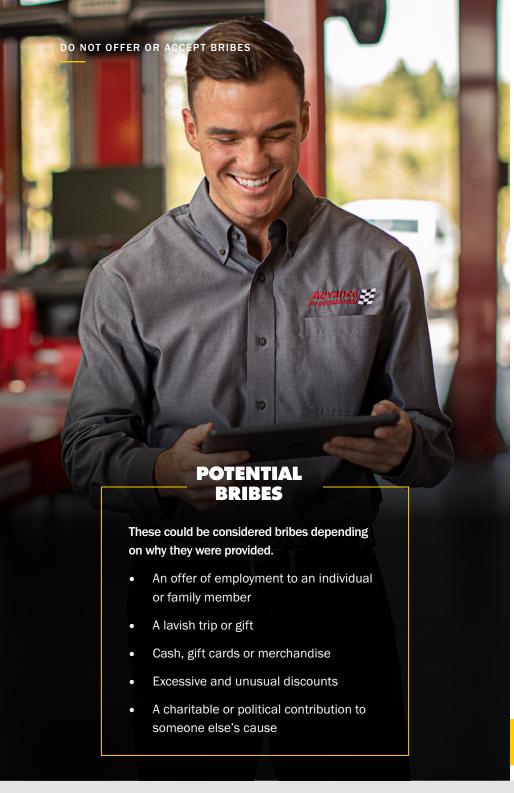
## LOOK UNDER THE HOOD

### **Anti-Bribery and Anti-Corruption Policy**

A bribe can be offered directly or indirectly, such as by having a third party pay the bribe. It can be offered on our behalf by one of our third parties, such as a freight forwarder or supplier, to a government official, such as a customs agent.

While we may offer legitimate and appropriate discounts or other incentives to Professional customers, we cannot try to "buy" a sale by offering an improper incentive, such as an excessive and unfair discount or extravagant gift. These principles can be helpful: If the customer is buying from us because of our quality, fair pricing and service, then it is a fair sale. If the customer is buying from us because they got something improper or unrelated to our business relationship in return, then it could be seen as a bribe.

You may be told that bribes are customary and "the way business gets done" in a particular area. However, that is not the way our company does business, no matter where we are, no matter what our competitors may do and no matter what other individuals may expect.





A customs agent said he will delay releasing a shipment unless we pay some money directly to him. The amount he wants is small and our customers need these products. Should we pay the money?

No. This is a facilitation payment, which is a type of bribe, and likely illegal. Immediately report the demand to management and Ethics and Compliance. Getting the right part to the right customer at the right time is important, but so is doing it right way. Paying a bribe is never the right way to get business done.

A Professional customer tells his Commercial Accounts Manager (CAM) that his son is interested in a job at Advance's corporate offices. The son is not qualified for the role, but the customer wondered if the CAM could "pull a few strings" with the hiring manager in exchange for a big order. The CAM said he could definitely get the hiring manager on board in exchange for the order. Could this be considered a bribe?

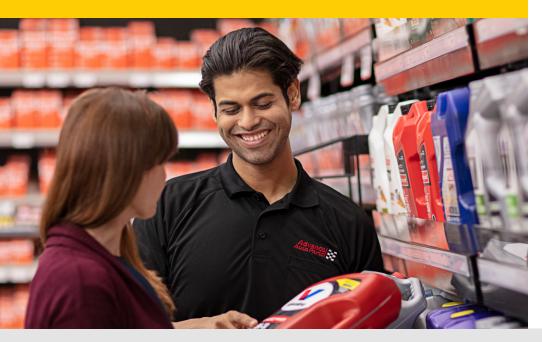
Yes. We hire the most qualified candidate. We do not make hiring decisions as a "thank you" for a sale or another business transaction. The CAM could have encouraged the customer to have his son apply at Advance, but he cannot promise a job in exchange for an order.

# TREAT CUSTOMERS AND THIRD PARTIES FAIRLY AND WITH INTEGRITY

### FAIR DEALING

Treat our customers and business partners fairly, honestly and with integrity—just as you want to be treated.

We are fair, professional and show integrity in all our business dealings, including our dealings with customers, suppliers, vendors, fellow team members and competitors. We do not take advantage of anyone we do business with through manipulation, concealment, abuse of confidential information, misrepresentation or any other unfair or dishonest business practice.



### WE TREAT OUR CUSTOMERS FAIRLY

Our success depends upon satisfied customers. You can satisfy our customers when you take these actions.

- Treat our customers fairly, honestly and show genuine concern for their needs.
- Never engage in unethical sales practices that would lose the trust of our customers and jeopardize our reputation in the industry.
- Do not make false statements about products or services to make a sale. This is true for interactions with our customers and in our advertising, sales and promotional materials.

Deliver the right part to the right customer at the right time—in the right way.

### WE TREAT OUR COMPETITION FAIRLY

Our customers shop with us because we sell quality products and offer great customer service—not because we criticize our competitors. Remember these guidelines.

- Do not share or seek out confidential information about our competitors from our suppliers.
- Do not share one supplier's confidential information with another, such as during a pricing negotiation.
- When you gather competitive information, do so fairly, honestly and in compliance with any relevant laws.

We embrace fair competition, and we do not take actions that limit competition in the market.



- Do not make false statements about our competitors or be untruthful about a
  product to make a sale. Our customers should choose to shop with us because
  we sell them the quality products they need and offer great customer service.
- If you are at a trade association meeting or other event and someone starts to improperly share competitive information, leave and report the incident to management.
- Do not make improper agreements with competitors about price, margins, terms of sale, territory or customer allocation, promotions or engage in other anti-competitive behavior.
- Stop the conversation if a supplier starts to share confidential information about a competitor. State that we do not engage in anti-competitive behavior and report the exchange to management.
- If things are getting difficult or tense in a negotiation with a potential service provider, treat that third party with respect and dignity as you would a fellow team member. Lean on the Procurement team to help facilitate the discussions.



A parts manufacturer contacted a team member in Merchandising. The manufacturer said they recently looked at prices for their products on the Internet ("price scraping") and found our competition was selling one of their products, on average, for \$1.25 more than we were. They encouraged us to increase our price for the product. Should we change our pricing?

It depends. We should not act on the manufacturer's recommendation alone. This could result in illegal vertical price fixing. We may, however, change prices with business justification based on information we obtain on our own. You should consult Legal if you have questions about pricing matters.

Team members were not being honest about how much life was left in customers' batteries so that they could increase sales. Was this okay since the batteries would need replacing eventually?

No. We must provide honest and complete information to customers. It is the right thing to do and is how we demonstrate Care for them.



### SELECT THIRD PARTIES THAT REFLECT OUR VALUES

### THIRD PARTIES

Engage third parties that will protect our reputation and show integrity when doing business on our behalf.

We strive to work with third parties that will help us achieve our Vision: Advancing a World in Motion. By working with vendors, suppliers and service providers that share our commitment to people, planet, community and integrity, we believe that we can build strong relationships that drive value for our shareholders and customers.

Our Supplier Code of Conduct sets expectations for third parties that provide goods or services to us. Because we hold our team members and business partners to the same high standards, our Supplier Code and this Code of Ethics complement each other.

Follow our requirements if you work with third parties.

### LOOK UNDER THE HOOD

**Supplier Code of Conduct | Third Party Management Policy** 

### Before you engage a third party:

- Follow our rules for gaining and reviewing competitive bids.
- Have a purchase order or legally approved contract in place, as required.
- Exercise appropriate due diligence to ensure they can deliver quality products or services at a competitive price, and they have a solid reputation for doing business the right way.
- Share our Supplier Code of Conduct.

### If you manage a relationship with a third party:

- Set the expectation that the third party will follow our Supplier Code.
- Follow our rules when working with the third party, including rules on kickbacks (bribes), and meals, gifts or entertainment.
- Contact Procurement or Vendor Contracts in Merchandising, as applicable, if the terms of the business relationship change and the contract needs updating.
- Use one of our available reporting options if you believe a third party may have violated its agreement, our policies or the law.



A supplier says that he can take actions prohibited by our policies and that seem to raise red flags—actions that can help us get merchandise to our customers faster and without much red tape. Because "faster" aligns with the company's desire to deliver with Care and Speed, can I take him up on his offer?

No. Our team members may not ask or allow a third party to do something prohibited by our Code, Supplier Code, policies or the law. Our commitment to delivering with Care and Speed never overrides our commitment to following the law and acting with integrity. If you're not sure if the request is appropriate, Speak Up.

# DO NOT ENGAGE IN INSIDER TRADING OR TIPPING

## INSIDER TRADING AND REGULATION FAIR DISCLOSURE

If you are in possession of material, nonpublic information, do not trade in Advance stock or share the information with others.

As individuals, we are subject to Insider Trading laws. These laws prohibit individuals from purchasing or selling securities while in possession of material, nonpublic information or from sharing such information with others.

- This "insider information" is different from other types of confidential information because it could influence someone to buy, sell or hold stock. Team members may obtain material, nonpublic information from a variety of sources, including a customer, a business partner or another third party.
- If you use insider information to make a stock trade ("insider trading")—or share
  insider information with someone who then makes a stock trade based on the
  information ("tipping")—you would be breaking the law and acting without integrity.

As a company, we are subject to Regulation Fair Disclosure rules. These rules prohibit us from selectively disclosing material, nonpublic information to analysts, institutional investors and others who may trade in the stock, unless we also concurrently share the information with the public.

- We authorize specific team members to communicate with the investment community regarding specific subjects or in response to specific inquiries.
- Only these authorized team members may respond to inquiries from the investment community or the media. Other team members must refer any external inquiries to one of the company's authorized speakers.

### **Examples of Insider Information**

Examples of insider (material nonpublic) information might include information about upcoming sales projections, earnings or losses, negotiation of a joint venture, merger or acquisition, expanding into global markets, new store opening strategy, news of a significant sale of assets, changes in dividend policies, the declaration of a stock split, the offering of additional securities, changes in top management, significant accounting developments, the gain or loss of a substantial supplier or a pending change in product lines or merchandise.



If you are not sure if you have insider information, contact the Legal department **before** you make any trades or share the information. This includes sharing the information with other team members who do not have a legitimate business need to know it.



A District Manager was granted AAP stock as part of our Fuel the Frontline program. During a confidential meeting, he learned about an upcoming change to a major supplier. He expects this news will decrease the value of our stock. Should be sell his stock based on this information?

No. This would be using insider information to trade stocks. This is against the law and our Code.

### LOOK UNDER THE HOOD

Insider Trading Policy | Fair Disclosure (FD) and Communications Policy



# IMPORT AND EXPORT PRODUCTS IN COMPLIANCE WITH THE LAW

## TRADE COMPLIANCE AND ANTI-MONEY LAUNDERING

Follow the relevant laws and regulations—and make sure our third parties do too.

We deliver the right part to the right customer at the right time—in the right way. This includes delivering the product a professional customer needs at its shop, having the merchandise that a do it yourself customer needs in a store or shipping product to international professional customers.

To meet the needs of our varied customer base, we need a strong supply chain that follows international trade laws. Following these laws requires the commitment of our team members, freight forwarders, suppliers and others. We can be held liable for the actions of the third parties we use, so we strive to only work with reputable companies and individuals that we can trust and that share our commitment to acting with integrity.

#### **Economic and Trade Sanctions**

The U.S. and other governments have lists restricting the countries, entities or individuals with whom we can do business. We conduct appropriate due diligence on relevant business partners and international customers to comply with these restrictions.

### **Customs Regulations**

In compliance with relevant customs regulations, we provide accurate classification, valuation, country of origin or other required information. We expect our business partners to do the same.

### Anti-Boycott Law

We follow the U.S. anti-boycott law. It says that companies cannot comply with another country's boycott if the U.S. does not support it.

### **Anti-Money Laundering**

Because trade can be complex, with interconnected supply chains, it is a way criminals use to launder money. Money laundering is when money earned through criminal activity is diverted to look like it came from a legitimate source. Signs of trade-based money laundering include false reporting on invoices, such as commodity misclassification or incorrect valuation, and over or under shipment of goods. Criminals can use other means to launder money, including bulk purchases of gift cards. Because money laundering is against the law, team members must be alert to its possible signs and report any concerns immediately to Asset Protection or the Team Member Hotline.



A supplier has submitted a parts catalog with country-of-origin information included. A team member notes the country of origin on a part references the U.S. although it is manufactured in China. The supplier explained that by reporting the country of origin as the U.S., the company would not be responsible for certain duties upon import. Cost reduction is a key performance objective for the team member, so he overlooks the discrepancy. Is this the right decision?

No. All information provided by the supplier must be correct at the time of submission. Failure to provide accurate information can result in imported goods being excluded, seized, recalled by Customs and subjected to liquidated damages or penalties.

A team member receives an order from an Independent owner in the Virgin Islands. The Independent owner explains that the order will be shipped to his location in the Virgin Islands. Then he will export the product to its final destination in Syria. This will avoid the U.S. embargo on shipments to Syria. Is this shipment allowed?

No. Under U.S. economic and trade sanction regulations, we may not export an item if we know a third party intends to transfer it to a prohibited recipient or destination. Team members are accountable for knowing their customers.



# WE DEMONSTRATE CARE FOR OTHERS AND OUR COMMUNITY

- 23 FAIR AND RESPECTFUL WORKPLACE
- **25** HEALTH AND SAFETY
- **27** HUMAN RIGHTS
- 29 COMMUNICATING EXTERNALLY
- 31 CHARITABLE DONATIONS AND POLITICAL ACTIVITIES
- 33 ENVIRONMENT



## **CHAMPION INCLUSION**

## FAIR AND RESPECTFUL WORKPLACE

Respect our differences and treat others as they would like to be treated. Simply put, be thoughtful and welcoming.

We Champion Inclusion. This means we embrace the diversity of people, thoughts, skills and styles to deliver results. We want our team members to feel safe to bring their full and true selves to the workplace—and to know they will be treated fairly and with respect when they do. We want this sense of inclusiveness and fairness to extend to our job applicants, customers and anyone with whom we do business. We also expect team members to be respectful in virtual environments such as virtual meetings and social media.

### We do not tolerate discrimination or harassment.

 Treat people fairly based on their skills and perspectives, not on how they look or what they believe.

- Create a welcoming environment that does not feel hostile, intimidating or offensive.
- Do not treat someone differently—and unfairly—because of a protected status, like their race, gender, sexual orientation, age, disability or country of origin.
- Do not threaten or intimidate someone.

If you are not sure if someone is being treated unfairly or disrespectfully, ask yourself these questions.

- Is someone being mocked because of a personal characteristic like how they look, talk or the pronouns they prefer?
- Is someone being excluded because they are "different" from others?
- Is someone being touched or talked to in a way that seems to make them or you feel uncomfortable?
- Is someone showing intolerance for a team member's beliefs or viewpoints?
- Do others seem troubled by the behavior? For example, is someone not laughing at a joke?

If you can answer "Yes" to any of these questions, report the incident to management, Human Resources or the Team Member Hotline.

We will take immediate and appropriate action if a team member is found to be involved in discrimination, harassment or other offensive or intimidating behavior.



### HARASSMENT AND DISCRIMINATION

Harassment or discrimination based on "protected status" characteristics is not only against our Code, but also against the law. These protected status characteristics may vary by state, province or country and may include the following:

- Age
- Citizenship status
- Color, race, ancestry or national origin
- Genetic information
- Marital status
- Medical condition or disability
- Military service or veteran status
- Pregnancy
- Religion
- Sex, gender, gender identity, gender expression or transgender status
- Sexual orientation
- Any other legally protected status

### SEXUAL HARASSMENT

Sexual harassment violates our Code and the law. It may consist of verbal, visual or physical conduct of a sexual nature. It is unwelcome and a reasonable person would find it offensive. It can take many forms, including the following when these things interfere with team members' ability to do their jobs.

- Sexual advances, requests for sexual favors or unwelcome demands for dates
- Touching someone in an unwelcome way
- Sexually oriented jokes, pictures, texts or email messages
- Making humiliating comments about someone's appearance



A professional customer keeps asking one of our team members for a date. I have heard her tell him no several times, but he will not take no for an answer. Even though he does not work for Advance and this is not happening to me, should I report this as possible sexual harassment?

Yes. When at work, team members should be free from discrimination or harassment, including sexual harassment, from anyone—another team member, a customer, a supplier or a service provider.

My manager will yell and say rude things if someone on the team does something wrong. Is this harassment?

It may not be harassment, but it creates an unpleasant work environment, and does not show Care for our team members. This behavior is not acceptable and you should report it to management, Human Resources or the Team Member Hotline.





## PROTECT OUR PEOPLE

### **HEALTH AND SAFETY**

Take actions that keep you and other team members safe at the workplace.

Because Our People Are Our Best Part, we are committed to creating a safe place for our team members to work. We believe that this also makes our stores a safe place to shop.

We believe that injuries or illnesses are preventable, and no activity is worth risking injury or accident. Team members are expected to recognize, prevent and stop any unsafe activity and to correct any recognized hazards or unsafe behaviors in the workplace.

We promote the safety of our team members through zero tolerance for workplace threats, incidents of violence or intimidation. Team members may not bring weapons or other potentially dangerous materials or items onto company property. This policy will be enforced in each state, province or locality to the fullest extent permissible under applicable law.

We prohibit substance abuse in the workplace. We believe that the use, possession and sale of drugs or alcohol by our team members while at the workplace puts our team members and our customers at risk.



Safety begins with you! Always act in a way that promotes our safety-focused culture. This includes:

- Report all accidents at company locations to management, regardless of the severity or if it involves a team member, customer or other third party.
- Report all team members accidents at non-workplace locations.
- Comply with all safety programs, signs, posters and labels.
- Maintain a clean and orderly workplace.



Avoid any actions that do not align with our safety-focused culture. This includes:

- Do not work under the influence of impairing drugs or alcohol.
- Do not use any unauthorized equipment or devices or use equipment in an unapproved manner.
- Do not drive a company vehicle unsafely or without having been motor vehicle record certified.

No workplace activity or delivery is worth getting hurt or involved in an accident over. Report unsafe behavior or activities to management or Environmental Health and Safety.



A team member refuses to leave the building when the fire alarm goes off. He says, "It's just the quarterly drill. I've got work to do. I am staying put." Is this acceptable?

No. Team members are expected to participate in all safety training to be prepared in the event of an emergency.

A team member discovers a damaged ladder in her department. Can the team member still use the ladder?

No. First, place the ladder out of service. Then the team member should immediately report the unsafe condition to their manager, who can process a repair request with Facilities Support.

I witnessed a customer put a wrench in their pocket and exit the store. Can I stop them and call the authorities?

No. Even if you believe you witnessed theft, you should not actively pursue a shoplifter for safety and liability reasons. Alert your manager or Asset Protection, and they will guide any appropriate follow-up actions.

### RESPECT HUMAN RIGHTS

### **HUMAN RIGHTS**

Treat people across the world with dignity and respect their human rights.

Advance believes that dignity and respect are fundamental rights of every individual. We are committed to upholding basic human rights in all areas of our business. We do not condone human trafficking, forced labor, child labor, harassment or abuse of any kind. We expect the third parties with whom we do business to follow the human rights principles outlined in our Supplier Code of Conduct.



### **FAIR TREATMENT**

We expect our suppliers to create a fair and respectful workplace for their employees, just as we do for our team members. This includes maintaining a workplace free of discrimination, harassment or any other offensive or intimidating behavior on the basis of race, color, religion, sex, age, national origin, disability, sexual orientation, gender identity or any other legally protected status.

### **FORCED OR CHILD LABOR**

We do not use, nor do we knowingly work with third parties that use forced, bonded, indentured, child or involuntary prison labor.

### **WORKING HOURS AND COMPENSATION**

We observe applicable laws and regulations governing wages, benefits, work hours, breaks and rest days, and we expect our suppliers to do the same.

### **HEALTH AND SAFETY**

We expect our suppliers to provide a safe and healthy work environment that complies with all applicable local, state, provincial and federal laws, just as we do for our team members. We expect them to minimize occupational hazards by setting up appropriate program controls, detecting and addressing health and safety risks, and providing relevant training.

### **DIVERSITY**

We recognize the value in hiring and retaining a diverse workforce and we encourage our suppliers to do the same.





### If you manage the relationship with a third party:

- Share our Supplier Code of Conduct, which includes our expectations that suppliers respect the human rights of their workers.
- Monitor third parties for potential red flags and keep track of human rights laws that may apply to our suppliers or the countries in which they operate.
- Speak Up if you believe a third party may not demonstrate our commitment to protecting human rights or other requirements in our Supplier Code.

# COMMUNICATE WITH INTEGRITY AND TRANSPARENCY

### **COMMUNICATING EXTERNALLY**

Protect Advance's reputation when making public statements, including on social media.

We are proud of what we do as a company, and we want to share our story with the public accurately, clearly, consistently and in a way that demonstrates our Cultural Beliefs no matter the medium or audience.

### **TALKING TO THE MEDIA**

How Advance appears to the public is important to our company's image and reputation. Speaking with the media, making an "off-the-record" comment or disclosing information that has not been shared publicly may hurt the company—financially, legally or competitively.

You may only engage with the media on behalf of the company if you are a designated media spokesperson. If you are contacted by the media about Advance-related matters, immediately notify management and refer the request to Communications for guidance.

### **EXTERNAL SPEAKING OPPORTUNITIES**

We are proud that our team members may be selected to speak at conferences or other external events. We want to ensure that the information they share reflects who we are as a company and does not disclose confidential information.

You must obtain prior approval from your management and Communications if you are invited to speak externally.



### **USING SOCIAL MEDIA**

Our team members' participation in social media can reflect upon the company.

This is why team members must be transparent, use common sense and protect Advance and themselves when using social media.

When you use social media, follow these rules.

- Disclose your connection to the company when you post about the company or our products and services.
- Be considerate of our team members, contractors, customers, suppliers, stakeholders and their privacy. Ask for permission before posting about others.
- Add your own personal message of excitement to official postings about specific promotions or pricing but leave the original announcement or post to official channels.





I received an invitation to speak at a local Boys and Girls Club about the benefits of attending community college. Do I need company approval since this is an external speaking event?

No. You would not need to seek approval if your presentation is unrelated to the company, and you are not presenting yourself as being affiliated with the company or speaking on behalf of the company.

I am connected to a team member on social media. He posted a video of himself using obscene language to complain about a customer. He was wearing his company uniform in the video. What should I do?

You should immediately report this to management, Human Resources or the Team Member Hotline. Team members have a right to their personal opinions, but this action reflects poorly on Advance because he was in uniform and talking badly about a customer.

# SUPPORT OUR COMMUNITIES AND THE POLITICAL PROCESS

## CHARITABLE DONATIONS AND POLITICAL ACTIVITIES

Give back to your community and be a part of the political process but do it on your own time and with your own resources.

At Advance, giving back is an important part of our company culture. Caring for others feels good and it is the right thing to do. We recognize that we can serve the communities where our customers shop, and our team members live, with our money, time and voice.

### **CHARITABLE CONTRIBUTIONS**

One of the most rewarding ways we live by our Vision—Advancing a World in Motion—is by finding ways to enrich the lives of our customers and team members in the communities where they live and work. That's why our commitment to giving back is something we take very seriously. We understand the importance of caring for one another and creating an environment where everyone can thrive.

We believe we can make the greatest impact as a company by having three primary areas of focus: Health/wellness, military veterans and their families and workforce development/education. We focus the company's charitable giving and resources in these areas. We do not donate to organizations that deny service, membership or other involvement on the basis of race, religion, color, sex, sexual orientation, gender identity, age, national origin, ancestry, citizenship, military or veteran status, or disability status.



We also believe that individuals can make a significant impact by donating their time and resources to the causes that are important to them. We encourage our team members to give back to their communities while on their own time and at their own expense, or as part of a company-sponsored fundraising campaign or event.



You are free to support the organizations that are important to you. However, remember these rules when interacting with our customers or third parties.

- Do not make personal requests to our customers or third parties for any charitable or political donation on your own behalf.
- Consult Community Relations before you commit charitable donations or resources on behalf of Advance.

### **POLITICAL ACTIVITIES**

On occasion, and with the approval of our General Counsel and Chief Executive Officer, Advance may support a political organization, legislative issue or ballot measure that may affect the company's operations. These decisions are made on a corporate level and other team members do not have the authority to involve the company in political matters. While Advance may take a position on a political matter, we do not intend to pressure team members to endorse a particular political issue or group.



You are free to contribute in an individual capacity to political candidates or participate in the political process. However, do not involve the company in your personal political activities.

- Do not use the Advance name or assets, such as computers or printers, to participate in personal political activities.
- Do not engage in personal political activities during work hours.
- Do not pressure other team members, customers, suppliers or our business partners to make political contributions or support or oppose candidates.



I volunteer at a local non-profit. May I ask Advance to make a charitable donation to support its work in my community?

Yes. We have a process for team members to request one-time monetary donations from the Advance Auto Parts Foundation. Search Starting Line for details.



## PROTECT OUR PLANET

### **ENVIRONMENT**

Contribute to Advance's sustainability practices by reducing, reusing, recycling, disposing of waste properly and following safety protocols when handling dangerous items.

At Advance, we know our stewardship of the environment is linked to our business success. That is why we focus on reducing our environmental impact across our operations.

As a company, we show our commitment to sustainability and environmental excellence in the following ways.

- We assess the environmental implications of our activities.
- We take the management and storage of hazardous material and hazardous waste seriously through proper team member training, container handling and transportation.
- We prepare with the needed equipment and resources to properly respond to emergency situations.
- We promote recycling and reuse programs company-wide, while continuing to leverage technology to reduce waste and consumption of natural resources.
- We address environmental compliance as part of applicable processes, procedures and training.
- We set goals and metrics to measure improvement in our environmental practices.





We can demonstrate our commitment to sustainability and environmental excellence in the workplace by considering the following:

- Protect the planet by reducing, reusing and recycling whenever possible.
   For example, avoid excessive printing or photocopying.
- Follow Advance policies regarding proper waste disposal.
- Turn off lights when they are not in use.
- Do not waste water.
- Minimize electricity use by putting PCs, printers, etc. to sleep or turning them off when not in use.

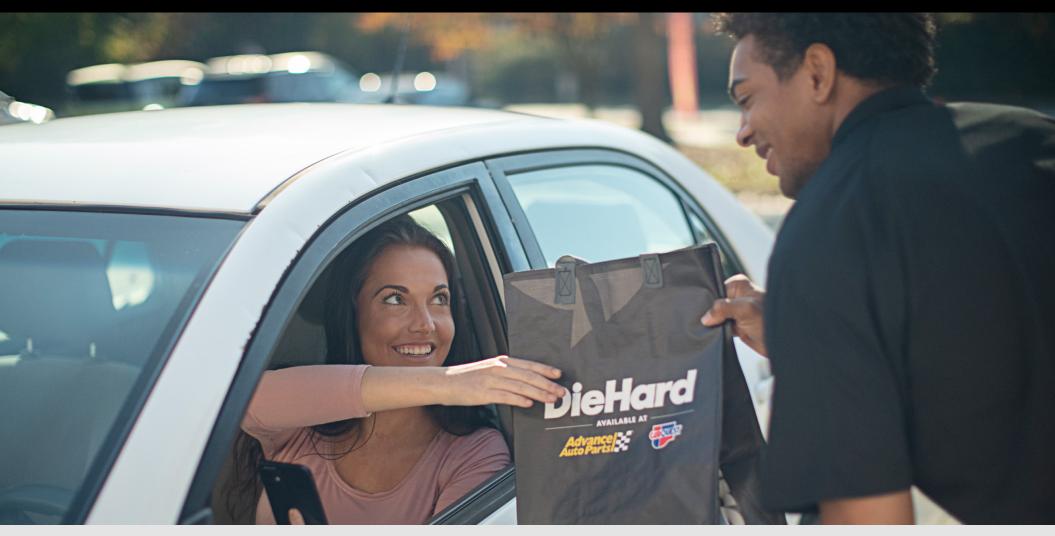


A customer purchases a DieHard® battery and notices an additional charge. They ask what it is for. What should the Retail Parts Pro (RPP) tell the customer?

The RPP should explain to the customer that the additional charge when purchasing a battery is for the recycling of the battery after its use. Many of our batteries have been validated by UL, meaning if returned they can be recycled to be used as a battery again.

### WE PROTECT OUR ASSETS

- 36 ACCOUNTING AND FINANCIAL CONTROLS
- **38** COMPANY ASSETS
- **40** CONFIDENTIAL INFORMATION
- **42** DATA PRIVACY





## KEEP ACCURATE RECORDS

## ACCOUNTING AND FINANCIAL CONTROLS

Create business records—from timecards to expense reports to regulatory filings—that are accurate, honest and follow our standards.

We show integrity by ensuring that all company information, records, filings, disclosures and public communications accurately reflect transactions and events. This includes a team member's timecard, approvals of PCard transactions, sales related to a customer's account and corporate accounting records. We also ensure our financial records conform to required accounting and reporting principles and Advance's systems of internal controls and policies.

### BUSINESS RECORD EXAMPLES

PCARD TRANSACTIONS AND APPROVALS

**EXPENSE REPORTS** 

**INVOICES** 

**SALES OR INVENTORY DATA** 

**TIMECARDS** 

**ANNUAL REPORT** 

EARNINGS STATEMENTS AND FINANCIAL RESULTS

### As a company, we commit to the following:

- Comply with generally accepted accounting principles.
- Verify that prices charged to customers are the same as those posted, advertised or quoted.
- Maintain a system of internal accounting controls that provide reasonable assurance to management and the Board of Directors that all business and financial transactions are properly recorded.
- Maintain books and records that accurately reflect all company business.
- Prohibit the establishment of undisclosed or unrecorded funds or assets.
- Ensure accurate filings with the U.S. Securities and Exchange Commission and other regulatory entities.
- Follow industry regulations, which subject us to independent audit, to help ensure that our financial statements do not contain material misstatements and that our internal controls are designed and operating effectively.

Team members also must commit to creating and maintaining business records that are accurate and honest. This is true at every level in the organization. Here are some examples of how you can show integrity by creating and maintaining accurate records.

- Stores or Branches: A Retail Parts Professional keeps an accurate record of her working time.
- **Distribution Center:** A Distribution Center worker accurately records the product we received in a supplier shipment.
- Corporate: A Director at the Customer Service Center submits an accurate expense report.



I believe in taking actions that add to our bottom line and I trust my team. I approve their expense reports without reviewing them. Is this a good way to be more efficient and less bureaucratic as a manager?

No. You are responsible for reviewing team expense reports, including receipts, to ensure they are accurate and comply with our rules. Approving expenses without reviewing them could lead to improper spending, inaccurate company records and potential disciplinary action for you.

A successful store wants to help a lower-performing store in the region. The successful store splits sales from a professional customer to the lower-performing store to help them hit their targets. Is this acceptable?

No. You must record sales when and where the product is sold. Splitting sales creates false financial records.

A General Manager wants to make his numbers to earn a bonus for team members at the store. He arranges for a customer to purchase enough product to make his target, and then he processes a return for all the product at the start of the new period. Are the store's records accurate?

No. This is booking fake sales to manipulate the store's performance and to take an unearned bonus. This is not allowed and would result in the General Manager's termination.



## PROTECT COMPANY ASSETS

### **COMPANY ASSETS**

Protect and respect Advance's physical and electronic assets just as you take care of your own.

Advance has different types of physical or electronic assets. These assets are part of our business operations and we would not be able to serve our customers without them.

Just as we should demonstrate Care with each other and our customers, we should demonstrate Care when using the company's assets.

### LOOK UNDER THE HOOD

**Acceptable Use Policy** 

### **PHYSICAL ASSETS**

Physical assets include our buildings, fixtures, tools, merchandise, office furniture, fleet vehicles or PCards.

You are responsible for taking care of the physical assets entrusted to you. Protect them from loss, theft, damage, carelessness or waste. Use them only for their intended and authorized purpose. This means, for example, you cannot use a company vehicle to run personal errands, take a portable battery charger home or put personal expenses on a company credit card.

### **ELECTRONIC ASSETS**

Electronic assets (technology) include computer hardware or software, email, mobile or storage devices.

You must protect our technology just as you protect our physical assets. A critical way to protect our electronic assets is to practice good cyber security by being on the lookout for—and reporting—vishing, phishing, malware or other cyberattacks. Never share your IDs, passwords or sensitive financial information. Only use the access rights you have for legitimate business purposes. For example, if you have access to team members' salary information to perform your job, do not look up someone's compensation just because you are curious.



Team members want to save their department money, so they agree to buy one software license and share the login credentials. Is this being a good steward of the company's money?

No. A software vendor may audit our use of their products against the number of licenses we have purchased. If they find a license is improperly shared, we may be subject to fines and penalties. A Distribution Center worker takes discarded merchandise home and sells it on eBay. Is this acceptable since Advance did not want the product anymore?

No. Team members may not take our products even disposed ones. Theft of any kind, including removing or allowing the removal of any merchandise from company premises without prior payment or permission, is a failure to protect company assets.

A Retail Parts Professional (RPP) realizes that the inventory system says a store has two rotors, but there are three on the shelf. Can the RPP process a refund to his personal credit card for the "extra" rotor to correct the inventory count in the system?

No. This is theft because the team member personally gained from the refund. Theft may lead to termination and prosecution.



Here are some ways that you can protect our physical and electronic assets.

- Use IT (electronic) resources as tools to achieve business goals.
- Strive for a "zero shrink culture" throughout our stores. ("Shrink" is when inventory "disappears.")
- Perform cycle counts to maintain on-hand integrity and prevent inventory quantity discrepancies.
- Be alert and avoid scammers. For example, if someone calls your store with a company caller ID and asks you to take cash out of the safe, purchase gift cards and then call them back with the gift card numbers, do not do so and report the incident to Asset Protection.
- Limit any personal use of certain company assets, such as a computer, and use good judgment when using these resources.
- Protect all company assets from theft or misuse.
- If you leave Advance, promptly return to your manager all company property and business information in your possession.

TABLE OF CONTENTS ADDITIONAL INFORMATION ADVANCE AUTO PARTS CODE OF ETHICS | 39 PREVIOUS NEXT

## SAFEGUARD CONFIDENTIAL INFORMATION

### **CONFIDENTIAL INFORMATION**

Protect the confidential information or intellectual property to which you have access.

Information—specifically confidential information or intellectual property—is another asset Advance holds. We have a duty to protect this information when it is owned by Advance or by other parties with which we do business. We must also appropriately destroy outdated company information when allowed by law or business practices.

### LOOK UNDER THE HOOD

**Acceptable Use Policy** 

**Data Classification Standard** 

**Data Protection Policy** 

**Data Protection Standard** 

**Records Management Policy and Retention Schedule** 



### **CONFIDENTIAL INFORMATION**

Confidential information is any proprietary company or business partner data that, if disclosed, could potentially lead to negative consequences for the company. It includes but is not limited to sales and profitability information, personnel or customer information, budgets, forecasts, growth plans, operating procedures, customer prospect lists, new initiatives, IT security design documents, merger and acquisition plans, or product lines. Company confidential data should only be shared with authorized team members who need to access the information to perform their job duties. Authorization or contractual agreements are required before sharing this data with third parties.

You must protect confidential information because the unauthorized disclosure of it could cause harm to the company and to others with whom we do business.

### INTELLECTUAL PROPERTY

Intellectual property, or "IP," includes ideas, creative expressions, know-how and other intangible creations of the mind including trademarks and logos, internal and external videos, website content and designs and inventions. This could be Advance's or a business partner's IP.

You may only use IP if you have the required permission, including any necessary licenses. This includes the use of Advance's name and brands. Advance's IP is generally managed by the Marketing function, with assistance from Legal. As such, you should consult with Marketing on any questions related to Advance IP.





Here are some ways that you can protect our information assets.

- Only share confidential information on a "need to know basis" and keep it in a secure place.
- Upon leaving Advance for any reason, promptly return all company property and information in your possession to your manager.
- Keep company information in a safe and accessible place for as long as required and destroy information appropriately.
- Work with Legal to ensure you have obtained all permissions and licenses before using another's intellectual property.



A Commercial Account Manager is giving homemade t-shirts he designed to Professional customers. The shirts are tie dyed and include the Advance logo. Is this acceptable since it is promoting our brand to our customers?

No. Our IP includes our logo, and it cannot be used without proper authorization. Advance marketing materials must be approved by the Marketing department.

A team member found a song that would be a great backdrop to some YouTube™ videos Advance creates. Can I add the song to the video if I work with Legal to get the licensing rights?

Yes. We can use the IP of third parties if we have received permission and worked out any licensing requirements. Marketing and Legal must be involved in these types of discussions.

A Worldpac branch needs more room. Boxes in the back include sales and other business information. Can the Branch Manager throw these documents away?

It depends. The Branch Manager must check our Records Management Policy and Retention Schedule and determine if the records can be destroyed and the appropriate time and method for their destruction.



### PROTECT PERSONAL AND PRIVATE INFORMATION

### **DATA PRIVACY**

Safeguard the personal information we hold, be transparent about how we collect and use it and follow the laws that may protect it.

We may have access to personal or sensitive information about our team members, customers or suppliers as a part of our business operations. We collect, store, use, share, transfer and dispose of this information with care and in compliance with all applicable privacy laws.

Personal information is any information that can be used directly or indirectly to reasonably identify a person. Some information, such as medical information, is personal and sensitive so it may require additional protections. You are required to protect and appropriately use all types of personal information you may have access to as a part of your job. As with confidential information, personal information should only be shared on a "need to know" basis and via secure means.



- NAMES
- EMAIL ADDRESSES
  - GOVERNMENT ISSUED
    IDENTIFICATION NUMBERS
  - DATES OF BIRTH
- BANK ACCOUNT OR CREDIT CARD NUMBERS
  - **HEALTH DATA**



If your job involves working with personal data, do the following:

- Ensure that how you collect, use, retain and destroy personal data is consistent with Advance's policies, standards and any contractual requirements.
- Collect the minimum amount of data necessary to achieve legitimate business objectives, keep it only as long as necessary and securely dispose of it when it is no longer needed.
- Ensure any third party that will have access to the data meets our data protection standards.
- Understand the various international, federal, provincial and state laws that may apply to personal data.
- Promptly report any actual or potential data breaches to Information Security and Ethics and Compliance.



We want to use customers' purchase history, demographic information and other data to build a learning model that recommends products to them. Are there any privacy considerations?

Yes. Work with Legal to ensure that this falls within the scope of how we originally said we would use the data we collected from customers, and ensure that any third party that helps us with this analysis meets our data protection standards and will protect any customer information that is shared.

I need to share a file that contains team members' personal information with another person on my team. We both "need to know" the data to do our jobs. Are there any privacy considerations?

Yes. Even if you are authorized to share this information, you must protect it. This may include encrypting the file or using a shared copy stored on a restricted access site. You also need to ensure that it is appropriately deleted when you are done with it.



## **QUESTIONS**OR CONCERNS

Use one of these options if you have a question or want to report a concern.

Talk to your manager, next-level manager, senior management or Human Resources

### Use our Team Member Hotline to submit anonymous concerns or questions

Via the web
www.ethicspoint.com

Via the phone

From the United States or Canada: 1-800-277-2900

From Taiwan: 00801-13-7956 From India: 000 800 9190 901

### **Contact Ethics and Compliance**

Via the postal service
Advance Auto Parts
Attention: Chief Compliance Officer
4200 Six Forks Road, Suite 2000
Raleigh, NC 27609 USA

☑ Via email ethicsandcompliance@advance-auto.com

Effective Date: November 2023

The Audit Committee of the Board of Directors has oversight over financial reporting, accounting, internal accounting controls and audit matters.

The company is committed to achieving compliance with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices ("Accounting and Audit Concerns"). If you have an Accounting and Audit Concern or questions on such matters, please follow our Open Door Policy, including reporting anonymously to our TM Hotline. If you wish to communicate directly with our Audit Committee about any Accounting or Auditing Concerns, including on an anonymous or confidential basis, you may do so by delivering a written communication to the Audit Committee Chair, c/o Advance Auto Parts, Inc., 4200 Six Forks Road, Raleigh, North Carolina 27609. Attention: General Counsel. The General Counsel will not open a communication that is conspicuously marked "Confidential" and addressed to the Audit Committee Chair and will forward each such communication to the Audit Committee Chair. Such communications will not be disclosed to the non-independent members of our Board or management unless so instructed by the Audit Committee Chair.

Accounting and Audit Concerns include, without limitation, the following:

- Fraud or other intentional violations of federal securities laws or regulations, including deliberate error in the recording and maintaining of financial records of the company;
- Deficiencies in or noncompliance with the company's internal accounting controls;

- Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the company;
- Misrepresentation or false statement to or by any senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of the company; or
- Deviation from full and fair reporting of the company's financial condition.

This Code is intended to provide guidance and a framework for ethical decision making. It is not and is not intended to be an agreement, bargain or contract of employment, express or implied, and certain terms used throughout may have legal definitions that will control.

Advance supports a team member's right to speak out publicly about matters of public concern and to participate in concerted activities and communications related to terms and conditions of employment. Nothing in any section of our Code of Ethics, or in any of our policies, is intended to limit or interfere with that right. Our Standards don't limit a team member's right to communicate with any government agency, such as the Equal Employment Opportunity Commission, the National Labor Relations Board, the Occupational Safety and Health Administration or the Securities and Exchange Commission (or relevant government agencies in other countries where we operate), or otherwise to participate in any investigation or proceeding that may be conducted by any such government agency, including providing documents or other information, without notice to the company.