

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

DAWON A. WORDLAW, individually)	
and on behalf of all similarly situated)	
individuals,)	
)	No. 20-cv-03200
<i>Plaintiff,</i>)	
)	
v.)	Hon. Manish S. Shah
)	
ENTERPRISE LEASING COMPANY)	
OF CHICAGO, LLC, a Delaware limited)	
liability company; ENTERPRISE)	
HOLDINGS, INC., a Missouri)	
corporation,)	
)	
<u><i>Defendants.</i></u>)	

FIRST AMENDED CLASS ACTION COMPLAINT WITH JURY DEMAND

Plaintiff Dawon A. Wordlaw (“Plaintiff”), individually and on behalf of all similarly situated individuals, brings this First Amended Class Action Complaint against Defendants Enterprise Leasing Company of Chicago, LLC, and Enterprise Holdings, Inc. (collectively, “Enterprise” or “Defendants”) for their violations of the Illinois Biometric Information Privacy Act, 740 ILCS 14/1, *et seq.* (“BIPA”), and to obtain redress for persons injured by their conduct. Plaintiff alleges the following based on personal knowledge as to Plaintiff’s own experiences, and as to all other matters, upon information and belief, including an investigation conducted by Plaintiff’s attorneys.

INTRODUCTION

1. BIPA defines a “biometric identifier” as any personal feature that is unique to an individual, including handprints, fingerprints and palm scans. “Biometric information” is any information based on a biometric identifier, regardless of how it is converted or stored. 740 ILCS § 14/10. Collectively, biometric identifiers and biometric information are known as “biometrics.”

2. This case concerns the misuse of individuals' biometrics by Defendants, providers of automobile rental services throughout Illinois. Using biometric enabled technology, Defendants are capturing, collecting, storing, disseminating, or otherwise using the biometrics of Plaintiff and other Class members, without their informed written consent as required by law, in order to track their time at work.

3. BIPA provides, *inter alia*, that private entities, such as Defendants, may not obtain and/or possess an individual's biometrics unless they first:

- (1) inform the person whose biometrics are to be collected *in writing* that biometric identifiers or biometric information will be collected or stored;
- (2) inform the person whose biometrics are to be collected *in writing* of the specific purpose and the length of term for which such biometric identifiers or biometric information is being collected, stored and used;
- (3) receive a *written release* from the person whose biometrics are to be collected, allowing the capture and collection of their biometric identifiers or biometric information; and
- (4) publish publicly available retention guidelines for permanently destroying biometric identifiers and biometric information. 740 ILCS 14/15(a).

4. Compliance with BIPA is straightforward and may be accomplished through a single, signed sheet of paper. BIPA's requirements bestow a right to privacy in biometrics and a right to make an *informed* decision when electing whether to provide or withhold biometrics.

5. Defendants use biometric timekeeping devices to track their employees' work hours. Defendants' system works by scanning their employees' biometric identifiers, such as their fingerprints, and subsequently using the same for authentication and timekeeping purposes. On

information and belief, the system includes the dissemination of biometrics to third parties, such as other Enterprise subsidiaries, data storage vendors, and payroll service providers.

6. The Illinois Legislature has found that “biometrics are unlike other unique identifiers that are used to access finances or other sensitive information. For example, even sensitive information like Social Security numbers can be changed. Biometrics, however, are biologically unique to each individual and, once compromised, such individual has no recourse, is at a heightened risk for identity theft, and is likely to withdraw from biometric facilitated transactions.” 740 ILCS 14/5. The risk is compounded when a person’s biometrics are also associated with their other personally identifiable information.

7. Plaintiff brings this action for statutory damages and other remedies as a result of Defendants’ conduct in violating Plaintiff’s biometric privacy rights.

8. On Plaintiff’s own behalf, and on behalf of the proposed Class and Subclass defined below, Plaintiff seeks an injunction requiring Defendants to comply with BIPA, as well as an award of statutory damages to the Class and Subclass members, together with costs and reasonable attorneys’ fees.

PARTIES

9. At all relevant times, Plaintiff Dawon A. Wordlaw has been a resident and a citizen of the state of Illinois.

10. Defendant Enterprise Holdings, Inc. is a corporation organized under the laws of the state of Missouri, with its principal place of business in St. Louis, Missouri, that conducts substantial business throughout Illinois, including within this District. Defendant Enterprise Holdings, Inc. is the corporate parent, and sole member, of Defendant Enterprise Leasing Company of Chicago, LLC. Defendant Enterprise Holdings, Inc.’s President and Chief Executive

Officer, Christine Taylor, Executive Chairman, Andrew Taylor, and Chief Financial Officer, Rick Short, are registered with the Illinois Secretary of State as the managers of Enterprise Leasing Company of Chicago, LLC.

11. Defendant Enterprise Leasing Company of Chicago, LLC is a limited liability company organized under the laws of the state of Delaware, with its principal place of business in Lombard, Illinois, that conducts substantial business throughout Illinois, and is registered with and authorized by the Illinois Secretary of State to transact business in Illinois, including under the assumed name “Enterprise Holdings.” Defendant Enterprise Leasing Company of Chicago, LLC is a regional subsidiary of Defendant Enterprise Holdings, Inc.

JURISDICTION AND VENUE

12. This Court has subject matter jurisdiction over this matter pursuant to the Class Action Fairness Act, 28 U.S.C. § 1332(d) *et seq.*, because this case is a class action in which the matter in controversy exceeds the sum or value of \$5,000,000, exclusive of interest and costs; there are greater than 100 putative class members; at least one putative class member is a citizen of a state other than Defendant; and none of the exceptions under subsection § 1332(d) apply.

13. This Court may assert personal jurisdiction over Defendants, because Defendants do business within Illinois and transact business in Illinois such that they have sufficient minimum contacts with Illinois and/or have purposely availed themselves of Illinois markets to make it reasonable for this Court to exercise jurisdiction over Defendants, and because Plaintiff’s claims arise out of Defendants’ unlawful in-state actions.

14. Venue is proper in this District because Plaintiff resides in this District and a substantial part of the events giving rise to Plaintiff’s claims occurred in this District.

GENERAL FACTUAL ALLEGATIONS

15. Defendants jointly operate automobile rental services in Illinois.

16. Defendant Enterprise Holdings, Inc. exercises substantial control over its regional subsidiaries', such as Defendant Enterprise Leasing Company of Chicago, LLC's, business practices and employee management practices, including with respect to employee privacy and data protection matters.

17. In fact, Defendant Enterprise Holdings, Inc. maintains a public Code of Conduct,¹ addressing employee management matters, which refers to its regional subsidiaries' employees as "our employees" and expressly governs its regional subsidiaries' employee management practices, referring to itself and its subsidiaries as a collective "Company": "The word 'Company,' where used in the Code, refers to Enterprise Holdings, Inc., Enterprise Fleet Management, Inc., and/or, in their individual capacities, each subsidiary company."

¹ A true and accurate copy of Defendants' shared, publicly-available Code of Conduct is attached hereto as Exhibit A.

LETTER *from our* CHIEF EXECUTIVE OFFICER

SINCE 1957, ENTERPRISE HOLDINGS' EMPLOYEES HAVE EXCEEDED CUSTOMERS' EXPECTATIONS BY BUILDING RELATIONSHIPS ONE HANDSHAKE AT A TIME AND ONE KEPT PROMISE AT A TIME.

Our organization is only as strong as the reputation that each of us maintains in the minds of customers, business partners, vendors, and employees. That is why we have made holding ourselves to the highest standards of business ethics and conduct the personal responsibility of every employee. It is one of our founding values.

The principles articulated in this Code of Conduct shine through in our culture, and they will not change. We communicate these timeless principles to employees each year because they remain fundamental to everything we say and do. We strive to demonstrate these principles every day. That may not always be easy, but you should understand that no financial objective outweighs our commitment to ethics, integrity, and compliance with applicable law. If you find yourself in a difficult situation where the right choice isn't clear, ask your supervisor for guidance. You can also speak to another resource listed in this Code, or call the Ethics Hotline. You will never experience retaliation for asking a question or reporting a concern.

The commitment, integrity, and hard work of all employees have made Enterprise Holdings the No. 1 total transportation provider in the world. Our values of respect, dignity, and customer service have fueled our success—and those values provide the foundation we will build upon for years to come.



Chriissy Taylor

CHRISSY TAYLOR
PRESIDENT AND CHIEF EXECUTIVE OFFICER

Enterprise Holdings, Inc., owns a network of regional subsidiaries in the United States which operate the Enterprise Rent-A-Car, National Car Rental and Alamo Rent A Car brands, as well as Enterprise Car Sales, and Enterprise Car and Ride Sharing. In the rest of the world, Enterprise Holdings, Inc., owns international subsidiaries that similarly operate a portfolio of car rental brands through an integrated global network of regional subsidiaries and franchises. Additionally, Enterprise Holdings, Inc.'s affiliate, Enterprise Fleet Management, Inc., operates a fleet management and leasing business in the United States and its subsidiary similarly operates this business in Canada. This Code of Conduct (Code), and the policies and principles underlying it, have been adopted by Enterprise Holdings, Inc., Enterprise Fleet Management, Inc., and, individually, by management of each subsidiary company. The word "Company," where used in the Code, refers to Enterprise Holdings, Inc., Enterprise Fleet Management, Inc., and/or, in their individual capacities, each subsidiary company.

18. The Code of Conduct expressly applies to all those within “the Company,” including, by definition, employees of Defendant Enterprise Holdings, Inc.’s regional subsidiaries:

WHO SHOULD FOLLOW THE CODE?

The Code applies to all of us regardless of our position within the Company. All of us are expected to follow the principles outlined in the Code and Company policies, to act with integrity in all business transactions, and to treat each other with respect at all times. Doing what is right is a personal responsibility and must always be an integral part of the Company’s mission. Additionally, we expect that Company suppliers, business partners, consultants, and licensees and franchisees will follow similar principles. Our [Supplier Code of Conduct](#) and [Franchisee Code of Conduct](#) explain more about this expectation.

19. With respect to employee privacy, the Code of Conduct states that Enterprise Holdings, Inc. and its subsidiaries protect sensitive information, including employees’ personal information, “by limiting access to those who have a business need to know it, securing the systems that transmit or store it, and *ensuring our use of the information complies with privacy laws*”:

To protect our brand and maintain our competitive advantage in the marketplace, we also have a duty to protect the Company's intangible assets: confidential information and intellectual property. This includes customer and employee personal information, trade secrets, financial information, computer files, vehicle telematics data, customer lists, and marketing plans. We protect this information, in part, by limiting access to those who have a business need to know it, securing the systems that transmit or store it, and ensuring our use of the information complies with privacy laws. This means, in part, that we properly collect and use personal information in accordance with our [Privacy Principles](#), [Global Privacy Policy](#), and [Personnel Policies Summary](#). As a rule, we take every precaution necessary to avoid the improper release of proprietary or confidential information. For more information, refer to the [Data Classification Policy](#).

20. The Code of Conduct also provides that Enterprise Holdings, Inc. and its subsidiaries are “committed to protecting the privacy of its employees’ private information”:

WE RESPECT EMPLOYEE PRIVACY

The Company is committed to protecting the privacy of its employees’ private information, including their protected health information. We will act in compliance with all applicable laws regarding the accessing, receipt, use, or disclosure of employee health or medical information.

For more information, please refer to the [Personnel Policies Summary](#).

21. As is evident from the Code of Conduct, Defendant Enterprise Holdings, Inc. and its regional subsidiaries, including Defendant Enterprise Leasing Company of Chicago, LLC,

subscribe to common policies, implemented by Enterprise Holdings, Inc., covering various areas of employee management, and do not observe corporate formalities with respect to employee management. Defendant Enterprise Holdings, Inc. speaks for its regional subsidiaries when it comes to managing employee privacy, and has publicly stated both its intention and its regional subsidiaries' intentions to comply with all privacy laws.

22. Thus, on information and belief, at all relevant times Defendant Enterprise Holdings, Inc. has exercised primary, if not exclusive, control over its subsidiaries', including Defendant Enterprise Leasing Company of Chicago, LLC's, practices with respect to employee privacy matters and other employment conditions.

23. As is evident from its Code of Conduct, Defendant Enterprise Holdings, Inc. had the exclusive final say as to whether its regional subsidiaries would comply with all privacy laws, including BIPA.

24. As is evident from its Code of Conduct, which does not differentiate between itself and its regional subsidiaries, Defendant Enterprise Holdings, Inc. has engaged in an undertaking to ensure legally-compliant and sufficient working conditions, which includes ensuring workers within its facilities are not subject to illegal working conditions, such as non-compliant biometric timekeeping systems and conduct by its subsidiaries that jeopardizes health, safety, or personal data.

FACTS SPECIFIC TO PLAINTIFF

25. In 2016, while Plaintiff was working for Defendants at an Enterprise facility in Cook County, Illinois, Defendants implemented biometric scanning and time-tracking devices and technology to monitor and manage their workers', including Plaintiff's, work hours.

26. While Plaintiff received her paychecks from Defendant Enterprise Leasing Company of Chicago, LLC, the conditions of her work environment, including matters pertaining to employee timekeeping, employee privacy, employee discipline, and the scope of acceptable employee behavior, were controlled by Defendant Enterprise Holdings, Inc.

27. Until Plaintiff left Defendants' employ in March 2019, Plaintiff was required to scan her biometric identifiers, in the form of her fingerprints, each time Plaintiff clocked in and clocked out of a shift at work.

28. Plaintiff relied on Defendants to not only provide a lawful and legally compliant biometric timekeeping system, but to also disclose all material information regarding the technology and system, including all relevant retention, destruction, and dissemination policies.

29. Prior to taking Plaintiff's biometrics, Defendants did not inform Plaintiff in writing that her biometrics were being collected, stored, used, or disseminated, or provide her with any disclosures relating to their collection, storage, or dissemination of her biometrics.

30. Defendants did not seek, and Plaintiff never provided, any written consent relating to the collection, use, storage, or dissemination of Plaintiff's biometrics.

31. Prior to taking Plaintiff's biometrics, Defendants did not make publicly available any written policy as to a biometric retention schedule, nor did Defendants disclose any guidelines for permanently destroying her collected biometrics.

32. Additionally, Defendants did not obtain consent from Plaintiff to disseminate Plaintiff's biometrics to third parties, including any data storage or payroll processing vendors.

CLASS ALLEGATIONS

33. Pursuant to Fed. R. Civ. P. 23(b)(2) and (b)(3), Plaintiff brings this action individually and on behalf of a Class and Subclass defined as follows:

Class: All individuals whose biometrics were captured, collected, stored, used, transmitted, or disseminated by or on behalf of Defendant Enterprise Holdings, Inc. within the state of Illinois at any time within the applicable limitations period.

Subclass: All individuals whose biometrics were captured, collected, stored, used, transmitted, or disseminated by or on behalf of Defendant Enterprise Leasing Company of Chicago, LLC within the state of Illinois at any time within the applicable limitations period.

34. Excluded from the Class and Subclass are any members of the judiciary assigned to preside over this matter; any officer or director of Defendants; and any immediate family member of such officers or directors.

35. Upon information and belief, there are at least hundreds of members of the Class, making the Class members so numerous that joinder of all members is impracticable. Although the exact number of Class members is currently unknown to Plaintiff, the members can be easily identified through Defendants' personnel records.

36. Plaintiff's claims are typical of the claims of the Class members Plaintiff seeks to represent, because the factual and legal bases of Defendants' liability to Plaintiff and the other members are the same, and because Defendants' conduct has resulted in similar injuries to Plaintiff and to the Class. As alleged herein, Plaintiff and the Class have all suffered damages as a result of Defendants' BIPA violations.

37. There are many questions of law and fact common to the claims of Plaintiff and the Class, and those questions predominate over any questions that may affect individual members. Common questions for the Class include, but are not limited to, the following:

- a. Whether Defendants' conduct is subject to BIPA;
- b. Whether Defendants made available to the public a written policy that establishes a retention schedule and guidelines for destroying biometrics;

- c. Whether Defendants obtained a written release from the Class before capturing, collecting, or otherwise obtaining their biometrics;
- d. Whether Defendants provided a written disclosure that explains the specific purposes, and the length of time, for which biometrics were being collected, stored and used before taking such biometrics;
- e. Whether Defendants' conduct violates BIPA;
- f. Whether Defendants' violations of the BIPA are willful or reckless; and
- g. Whether Plaintiff and the Class are entitled to damages and injunctive relief.

38. Absent a class action, most members of the Class would find the cost of litigating their claims to be prohibitively expensive and would thus have no effective remedy. The class treatment of common questions of law and fact is superior to multiple individual actions in that it conserves the resources of the courts and the litigants and promotes consistency of adjudication.

39. Plaintiff will adequately represent and protect the interests of the members of the Class. Plaintiff has retained counsel with substantial experience in prosecuting complex litigation and class actions. Plaintiff and Plaintiff's counsel are committed to vigorously prosecuting this action on behalf of the other members of the Class and have the financial resources to do so. Neither Plaintiff nor Plaintiff's counsel have any interest adverse to those of the other members of the Class.

40. Defendants have acted and failed to act on grounds generally applicable to Plaintiff and the other members of the Class, requiring the Court's imposition of uniform relief to ensure compatible standards of conduct toward the members of the Class and making injunctive or corresponding declaratory relief appropriate for the Class as a whole.

COUNT I

**Violations of the Illinois Biometric Information Privacy Act, 740 ILCS 14/1, *et seq.*
(On behalf of Plaintiff and the Class and Subclass)**

41. Plaintiff incorporates the foregoing allegations as if fully set forth herein.

42. Defendants are each a private entity under BIPA.

43. BIPA requires private entities, such as Defendants, to obtain informed written consent from individuals before acquiring their biometric information. Specifically, BIPA makes it unlawful to “collect, capture, purchase, receive through trade, or otherwise obtain a person’s or customer’s biometric identifiers or biometric information unless [the entity] first: (1) informs the subject . . . in writing that a biometric identifier or biometric information is being collected or stored; (2) informs the subject . . . in writing of the specific purpose and length of for which a biometric identifier or biometric information is being captured, collected, stored, and used; and (3) receives a written release executed by the subject of the biometric identifier or biometric information” 740 ILCS 14/15(b).

44. BIPA also requires that private entities in possession of biometric identifiers and/or biometric information establish and maintain a publicly available biometric retention and destruction policy.

45. Plaintiff and the other Class and Subclass members have had their “biometric identifiers,” namely their fingerprints, collected, captured, or otherwise obtained by Defendants in order to track their work hours. Plaintiff and the other Class and Subclass members’ biometric identifiers were also used to identify them, and therefore constitute “biometric information” as defined by BIPA. 740 ILCS 14/10.

46. Each instance Plaintiff and the other Class and Subclass members were required to scan their fingerprints, Defendants captured, collected, stored, and/or used Plaintiff’s and the other

Class and Subclass members' biometric identifiers or biometric information without valid consent and without complying with and, thus, in violation of BIPA.

47. Defendants' practice with respect to capturing, collecting, storing, and using biometrics fails to comply with applicable BIPA requirements:

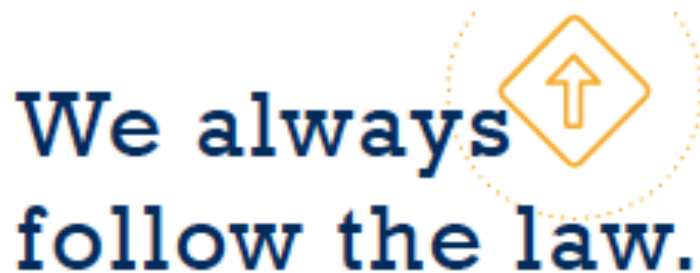
- a. Defendants failed to inform Plaintiff and the members of the Class in writing that their biometrics were being collected and stored, prior to such collection or storage, as required by 740 ILCS 14/15(b)(1);
- b. Defendants failed to inform Plaintiff and the Class in writing of the specific purpose for which their biometrics were being captured, collected, stored, and used, as required by 740 ILCS 14/15(b)(2);
- c. Defendants failed to inform Plaintiff and the Class in writing the specific length of term their biometrics were being captured, collected, stored, and used, as required by 740 ILCS 14/15(b)(2);
- d. Defendants failed to obtain a written release, as required by 740 ILCS 14/15(b)(3);
- e. Defendants failed to provide a publicly available retention schedule detailing the length of time for which the biometrics are stored and/or guidelines for permanently destroying the biometrics they store, as required by 740 ILCS 14/15(a); and
- f. Defendants failed to obtain informed consent to disclose or disseminate the Class' biometrics to third parties, as required by 740 ILCS 14/15(d)(1).

48. By capturing, collecting, storing, and using Plaintiff's and the Class' biometrics as described herein, Defendants denied Plaintiff and the Class their right to statutorily required

information and violated their respective rights to biometric information privacy, as set forth in BIPA.

49. BIPA provides for statutory damages of \$5,000 for each willful and/or reckless violation of BIPA and, alternatively, damages of \$1,000 for each negligent violation of BIPA. 740 ILCS 14/20(1)-(2).

50. Defendants knew, or were reckless in not knowing, that the biometric timekeeping systems used would be subject to the provisions of BIPA, a law in effect since 2008, yet wholly failed to comply with the statute. As is evident from Defendants' Code of Conduct, Defendants represent that they strive to stay abreast of and comply with applicable privacy laws, but failed to do so with respect to BIPA:



51. Alternatively, Defendants negligently failed to comply with BIPA.

52. Accordingly, with respect to Count I, Plaintiff, individually and on behalf of the proposed Class, prays for the relief set forth below.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, individually and on behalf of the proposed Class and Subclass, respectfully requests that this Court enter an Order:

- a. Certifying the Class and Subclass as defined above, appointing Plaintiff as class representative and the undersigned as class counsel;
- b. Declaring that Defendants' actions, as set forth herein, violate BIPA;

- c. Awarding injunctive and equitable relief as necessary to protect the interests of Plaintiff and the Class by requiring Defendants to comply with BIPA;
- d. Awarding statutory damages of \$5,000 for each willful and/or reckless violation of BIPA, pursuant to 740 ILCS 14/20(2);
- e. Awarding statutory damages of \$1,000 for each negligent violation of BIPA, pursuant to 740 ILCS 14/20(1);
- f. Awarding reasonable attorneys' fees, costs, and other litigation expenses pursuant to 740 ILCS 14/20(3);
- g. Awarding pre- and post-judgment interest, as allowable by law; and
- h. Awarding such further and other relief as the Court deems just and equitable.

JURY DEMAND

Plaintiff requests trial by jury of all claims that can be so tried.

Dated: September 21, 2020

Respectfully submitted,

DAWON A. WORDLAW, individually and
on behalf of all similarly situated individuals

By: /s/ Timothy P. Kingsbury
One of Plaintiff's Attorneys

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Attorneys for Plaintiff and the Putative Class

EXHIBIT A

ENTERPRISE HOLDINGS[®]



CODE *of* CONDUCT

LETTER *from our* CHIEF EXECUTIVE OFFICER

SINCE 1957, ENTERPRISE HOLDINGS' EMPLOYEES HAVE EXCEEDED CUSTOMERS' EXPECTATIONS BY BUILDING RELATIONSHIPS ONE HANDSHAKE AT A TIME AND ONE KEPT PROMISE AT A TIME.

Our organization is only as strong as the reputation that each of us maintains in the minds of customers, business partners, vendors, and employees. That is why we have made holding ourselves to the highest standards of business ethics and conduct the personal responsibility of every employee. It is one of our founding values.

The principles articulated in this Code of Conduct shine through in our culture, and they will not change. We communicate these timeless principles to employees each year because they remain fundamental to everything we say and do. We strive to demonstrate these principles every day. That may not always be easy, but you should understand that no financial objective outweighs our commitment to ethics, integrity, and compliance with applicable law. If you find yourself in a difficult situation where the right choice isn't clear, ask your supervisor for guidance. You can also speak to another resource listed in this Code, or call the Ethics Hotline. You will never experience retaliation for asking a question or reporting a concern.

The commitment, integrity, and hard work of all employees have made Enterprise Holdings the No. 1 total transportation provider in the world. Our values of respect, dignity, and customer service have fueled our success—and those values provide the foundation we will build upon for years to come.



Chrissy Taylor

CHRISSY TAYLOR
PRESIDENT AND CHIEF EXECUTIVE OFFICER

Enterprise Holdings, Inc., owns a network of regional subsidiaries in the United States which operate the Enterprise Rent-A-Car, National Car Rental and Alamo Rent A Car brands, as well as Enterprise Car Sales, and Enterprise Car and Ride Sharing. In the rest of the world, Enterprise Holdings, Inc., owns international subsidiaries that similarly operate a portfolio of car rental brands through an integrated global network of regional subsidiaries and franchises. Additionally, Enterprise Holdings, Inc.'s affiliate, Enterprise Fleet Management, Inc., operates a fleet management and leasing business in the United States and its subsidiary similarly operates this business in Canada. This Code of Conduct (Code), and the policies and principles underlying it, have been adopted by Enterprise Holdings, Inc., Enterprise Fleet Management, Inc., and, individually, by management of each subsidiary company. The word "Company," where used in the Code, refers to Enterprise Holdings, Inc., Enterprise Fleet Management, Inc., and/or, in their individual capacities, each subsidiary company.

our **FOUNDING VALUES**

OUR BRANDS are the most valuable thing we own.

PERSONAL HONESTY AND INTEGRITY
are the foundation of our success.

CUSTOMER SERVICE is our way of life.

Our company is a fun and friendly place where
TEAMWORK RULES.

We work hard... and **WE REWARD HARD WORK.**

GREAT THINGS HAPPEN WHEN WE LISTEN...
to our customers and to each other.

WE STRENGTHEN OUR COMMUNITIES,
one neighborhood at a time.

Our doors are **OPEN.**



THE VALUES THAT DEFINE US AND DRIVE US

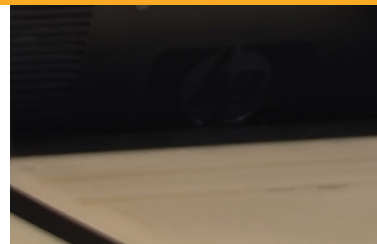


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Upholding our standards on integrity.

WHY WE HAVE A CODE OF CONDUCT

The Code of Conduct explains the standards of integrity we are all expected to uphold in our daily business interactions. We all make decisions every day that shape our work environment and the Company. In order to maintain a positive environment for each other, exceed our customers' expectations, and ensure the Company's continued success, we must understand and embrace the standards contained in the Code. Although not every situation we encounter can be covered in these pages, this document is intended as a guideline for achieving and maintaining the highest ethical business practices.

Your own personal values and instincts should lead you to the proper decisions, but if you are ever unsure about the right course of action, it is best to ask your immediate supervisor for advice prior to making any decision. As you work your way through difficult issues, keep these questions in mind:

Is it legal?

Is it the right thing to do?

Can you justify it to...

- your customers?
- your fellow employees?
- your supervisor?

If the answer to any of these questions is "no," or if you are not sure, seek appropriate advice before acting.

We make decisions every day that shape our work environment.



WHO SHOULD FOLLOW THE CODE?

The Code applies to all of us regardless of our position within the Company. All of us are expected to follow the principles outlined in the Code and Company policies, to act with integrity in all business transactions, and to treat each other with respect at all times. Doing what is right is a personal responsibility and must always be an integral part of the Company's mission. Additionally, we expect that Company suppliers, business partners, consultants, and licensees and franchisees will follow similar principles. Our [Supplier Code of Conduct](#) and [Franchisee Code of Conduct](#) explain more about this expectation.



WHAT LAWS MUST WE KNOW AND FOLLOW?

It is imperative that we always follow the law—wherever we are located. Keep in mind that laws vary based upon location, so if you are ever unsure about whether something is allowed, you should seek guidance before taking action. Additionally, each of us is expected to know and follow all laws and regulations that specifically apply to our jobs. If you are ever in a situation where local law or custom is at odds with what is outlined in the Code, follow the more stringent standard or seek clarification from your supervisor, your Compliance and Ethics Committee, or the Corporate Compliance and Ethics Department.



OBLIGATIONS OF SUPERVISORS

Employees in leadership positions are expected to do just that—lead by example and promote an open-door policy where employees feel comfortable raising questions or concerns. When employees bring issues to their supervisors' attention, those leaders are expected to address concerns and resolve them appropriately. It is also their obligation to monitor the business conduct of the employees who report to them to ensure compliance with the Code. Finally, supervisors are required to make sure the employees who report to them are trained on the Code and all relevant policies.

It is especially important that supervisors promptly report any known or suspected violation of the Code or the law and never retaliate or ignore acts of retaliation against others. Supervisors who know—or should have known—about a violation but fail to report it may be subject to discipline up to and including termination.

WHAT ARE THE CONSEQUENCES OF CODE OF CONDUCT VIOLATIONS?

Violations of the Code may result in disciplinary action up to and including termination. For violations of the Code that also break the law, the individuals involved may be subject to civil action or criminal prosecution. While certain sections of the Code point out the potential consequences of violations, be aware that the Company retains the right to apply disciplinary action for any act of misconduct.

We always  follow the law.

Great things happen when we listen to each other.

HOW TO REPORT CONCERNS AND WHERE TO GO FOR GUIDANCE

One of our Founding Values is “Great things happen when we listen to each other.” This means that each of us should always feel comfortable coming forward and reporting concerns. If you have observed or suspect a violation of the Code or the law, you are encouraged to report it to your immediate supervisor. If you are uncomfortable going to your immediate supervisor for any reason, consider contacting any of the resources listed below for guidance:

- Your next-level supervisor
- The Human Resources Department
- The Compliance and Ethics Committee

Additionally, you may report concerns through the ethics hotline. A link to the hotline for online reporting, as well as a toll-free number for telephonic reporting, are available on the intranet home page and HUB. Both services are monitored 24 hours a day, 365 days a year, by an independent third-party provider. Both the website and the toll-free number allow you to report anonymously, where allowed by law.

Everyone is encouraged to report unethical or illegal behavior. The Company will not tolerate retaliatory acts toward anyone who makes a report.

HOW WE INVESTIGATE REPORTS

All reports, however submitted, will be investigated promptly and thoroughly, and the Company will take corrective action when warranted. Reports will be handled confidentially within the limits of the law.

Everyone is encouraged to report unethical or illegal behavior.



Report to your Immediate Supervisor, Next-Level Supervisor, or Human Resources



Report to the Compliance and Ethics Committee



Report through the Ethics Hotline

Customer service is our way of life.

WE PROVIDE QUALITY PRODUCTS AND SERVICES

Our customers trust us to provide properly maintained, reliable vehicles and uncompromising service across all of the Company's brands. Therefore, we must comply with applicable laws, regulations, and internal processes when it comes to maintaining our fleet of vehicles. If you have any concerns about the safety of our vehicles or the quality of our service, you should promptly report them.

Additionally, we maintain customer trust by holding Company suppliers accountable for the quality and safety of the products and services they provide to us. If you believe that a supplier is not meeting our high standards of quality and safety, you are encouraged to report the situation.

For more information, please refer to our [Supplier Code of Conduct](#).

WE DEAL FAIRLY WITH CUSTOMERS AND SUPPLIERS

We build loyal, long-term relationships with our customers, business partners, and suppliers by treating them fairly at all times. These relationships, sustained by personal honesty and integrity, are the foundation of our success. Our dedication to fair dealing means that we provide only honest and accurate information to our customers and business partners. We do not misrepresent facts or engage in unethical or illegal conduct.

We maintain an uncompromising focus on customer service—whether it is Enterprise Rent-A-Car's attentive, personalized service, the price and efficient service of Alamo, the speed and choice of offerings at National, or the "no-haggle" pricing of Car Sales. Customers seek out—and stay with—our brands and services because we truly believe in and deliver on complete customer satisfaction every day. Our goal is to exceed every customer's expectations.

We deliver our products and services to customers without favoritism or discrimination. We do not solicit tips, gratuities or other consideration for delivering products and services. Just as importantly, we honor our commitments and keep our promises. We communicate clearly and immediately clarify misunderstandings. We will always go the extra mile to ensure our customers' loyalty.

We have learned that when we truly listen to our customers and understand their needs, they come back. This leads to opportunities—from little ways to serve them better, to new lines of business that open up exciting growth prospects for the Company.

We honor our commitments and keep our promises.



WE REPRESENT OUR COMPANY FAIRLY AND ACCURATELY

The Company believes in competing vigorously but fairly, which means that those of us involved in marketing, advertising, or sales must ensure that we only make accurate statements about our capabilities. We must remain accurate and truthful when representing the quality, features, or availability of any of our products or services.

WE PROTECT THIRD-PARTY INFORMATION

Our customers, suppliers, and other business partners frequently entrust us with confidential information that we agree to protect from disclosure or misuse. This means we diligently abide by all non-disclosure or confidentiality agreements that apply to us. Our obligation to protect this confidential information may continue even after our relationship with the third party or our employment ends.

We also respect all third-party rights protected by copyright, trade secret, patent, or other intellectual property laws. This means, in part, that we may not install or distribute software products on Company-owned computers that are not appropriately licensed for such use. In addition, we may not make unauthorized copies of any copyrighted material.

For more information, refer to the [Personnel Policies Summary](#).

OUR PROCEDURES FOR WORKING WITH GOVERNMENT CUSTOMERS

When working with government customers, we must follow certain laws and regulations that are often much stricter and more complex than those that govern our other business transactions. Be aware that violations of these rules can result in substantial fines, the loss of future government contracts, and even criminal prosecution for the individuals involved and the Company.

Specific rules apply to doing business with the U.S. Government. If your work involves marketing or selling to, or contracting with or working on projects for, a U.S. Government agency, it is your responsibility to know and follow the particular rules that apply. This section does not provide all of the information and guidance we need to ensure that we are complying with the law.

Please refer to the [U.S. Federal Government Handbook](#) for more information.



Q

James tells customers that their regular car insurance won't cover damages to the rental vehicle if they're in an accident. He knows that it really depends on each customer's insurance policy, and that many customers actually are covered for damage to a rental car.

Still, this approach helps him sell more damage waiver protection, so he decides to keep giving customers this information. Is this ok?

A

No. James should not give customers information that he knows is potentially misleading, even if he thinks it is helping the bottom line.


We have a responsibility to provide our customers with accurate information about the Company and its products. Doing so helps us maintain strong relationships and generate long-term business.

The foundation of our success.

WE KEEP HONEST AND ACCURATE BOOKS AND RECORDS

Our customers, suppliers, business partners, lending sources, regulatory authorities, and fellow employees trust us to report transactions and events in a clear, concise, truthful, timely, and accurate manner. Every record and accounting entry must be accurate and may not hide or disguise the true nature of any transaction. Every one of us, regardless of our position within the Company, has an obligation to make sure that the information we record meets these standards. Our financial records must conform to both generally accepted accounting practices and our own system of internal controls.

We each must do our part to make sure that the information we enter, such as that in time sheets, expense reports, and other reports, is accurate. In addition, we need to submit reports in a timely manner and always include full and appropriate documentation when submitting contracts for processing or payment. You are encouraged to report any questions or concerns about accurate books and records.



Properly maintaining Company books and records is as important as accurately creating them.

We have established procedures for maintaining documents and files for required periods and destroying them when they are no longer needed. For more information regarding our data-retention guidelines, reach out to your supervisor or Business Manager.

From time to time, you may be notified about documents relevant to a pending, threatened, or anticipated litigation, investigation, or audit.

We each have an obligation to cooperate with internal and external inquiries conducted by auditors, attorneys, investigators, or government agencies. Never destroy, alter, or hide a document in anticipation of or in response to such a request, and do not destroy any document potentially covered by a request without the express authorization of the Legal Group. **If you receive a request for information from a government agency, as necessary or appropriate, notify the Legal Group before providing any information.**

HOW WE RESPOND TO INQUIRIES FROM THE MEDIA

If you are contacted by a member of the media, you should refer them to **Corporate Communications at reporterinquiries@ehi.com** and notify your supervisor. Doing so allows for a complete and consistent message by the company.

Q Stephanie's branch is understaffed at the moment. Her manager promises that it won't last for long, but in the meantime, everyone needs to work—but not record—extra hours. He promises that he will make sure everyone gets some extra time off to make up for it.

Should Stephanie do as her manager asks?

A **No, Stephanie should accurately record all the hours she works.** Her manager should not have made this request. It is important for all the information we record for any purpose to be honest and accurate. Stephanie should report the request made by her manager to the Human Resources Department.

Q

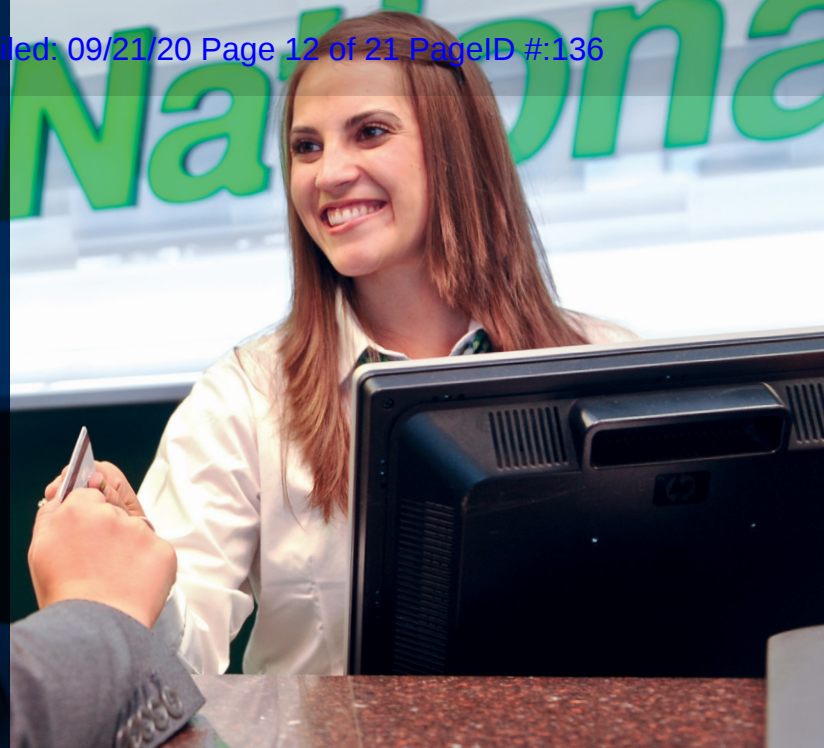
Shantelle works at an Enterprise Car Sales dealership. The dealership has a contract with a maintenance company that cleans the facilities on a regular basis. When she reviews an invoice from the maintenance company, Shantelle notices that they are billing the Company at a lower hourly rate than their contract specifies.

Even though the lower rate would be saving the dealership money, she decides to reach out to the maintenance company to point out the error. Is she doing the right thing?

A

Yes, she is.

We need to follow the terms of all our contracts and make sure all invoices we receive and payments we make are correct.



WE AVOID CONFLICTS OF INTEREST

A conflict of interest occurs when one's personal interests interfere with their ability to make unbiased decisions on behalf of the Company. When performing your job, you should base your actions on sound business judgment and not be motivated by personal gain. Any situation that creates or appears to create a conflict between your personal interests and those of the Company must be avoided. If you find yourself confronted with any of the situations described below, or if you are ever in doubt as to whether a business relationship is appropriate, you should bring the situation to your supervisor's attention at once to determine the best course of action. Remember, having a conflict of interest is not always a violation of the Code, but failing to disclose the situation might be.

Gifts and Entertainment

The providing or exchanging of gifts and other things of value are common courtesies that can serve to enhance our business relationships with our customers, business partners, and suppliers. However, we never want any courtesy to compromise an individual's ability to make objective and fair business decisions.

Accepting or giving things of value is subject to restrictions relating to monetary value, how often you may give to or receive something from an individual, and other factors. The [Anti-Corruption Policy](#) provides detailed information on this topic.

You should note that the rules surrounding gifts to or entertainment of government officials are much stricter than those relating to non-government entities. Please refer to the [Anti-Corruption Policy](#) and the "Our Procedures for Working on Government Contracts" and "We Comply with Anti-Corruption Laws" sections of the Code for more information. **If you have any questions about acceptable gifts or entertainment, please contact your supervisor or the Legal Group before acting.**

Improper Personal Benefits

Unless otherwise made generally available to all of us, we are not allowed to accept special personal pricing for goods or services in our relationships with customers or suppliers because this would be considered a personal gift. Whenever special group pricing is available from a supplier, this arrangement should in no way obstruct our pricing arrangements or purchasing decisions. We should not offer special personal pricing to our customers or suppliers outside the requirements of certain contracts or our established discount programs.



Robert works with a local body shop that repairs cars from Enterprise on a regular basis. Over the years, he's become friendly with the owner of the business, Juan. He learns that Juan will celebrate his tenth anniversary of being in business.

Can Robert send him a small gift basket to mark the occasion?



Probably—but Robert needs to check with his supervisor before sending the gift, to make sure it meets all of our guidelines.

We may offer gifts only in specific situations, and only if they meet our requirements. Ask your supervisor if you have questions about whether a gift is appropriate.

Financial Investments

A conflict of interest can also arise if you, your family member, or a close friend has a personal or material financial stake in a company that is our supplier, potential supplier, or competitor. If you find yourself in that situation, you must not use your position to influence the bidding process or negotiation in any way. If you are directly involved in supplier selection, notify your supervisor immediately and remove yourself from the decision-making process. If you have a family member or close friend who works for a competitor, you need to notify your supervisor.

Never use your position to influence a bidding process or negotiation in any way.



Outside Employment

Sometimes taking outside employment may create a potential conflict of interest. We may not take another job that interferes with our ability to do our work, such as conducting outside business during working hours or using Company property, equipment, or information for non-Company use. In addition, we must not take outside employment with a supplier or competitor of our Company. Because taking an outside job may create a conflict of interest, you must notify the Human Resources Department before you do so. Similarly, serving on the board of directors or a similar body for an outside company or government agency requires the advance approval of the Human Resources Department.

Corporate Opportunities

Through your work or through contacts with customers or suppliers, you may become aware of an opportunity to make a purchase or investment in which the Company (whether subsidiary or holding company) might be interested. You must promptly notify your supervisor of the opportunity. You may not act on the opportunity privately before the Company has had a chance to evaluate it and has decided to pass on it. Any personal investments must be in accordance with Company policy.

Personal Relationships

It is also important to avoid supervising family or individuals with whom you have a personal (i.e. intimate, romantic) relationship, even indirectly. If a personal or family relationship between employees exists—especially if it is also a reporting relationship—it may seem that one employee could receive preferential treatment or favoritism. For this reason, you should never be placed in a position where you have direct decision-making authority over a family member or someone with whom you have a personal relationship, or vice versa.

Remember, the important thing is to avoid even the appearance of bias. In the event a relationship is desired or anticipated to develop, you should disclose this to your supervisor so that it may be evaluated for any potential conflicts of interest.

For further information, refer to the [Personnel Policies Summary](#).

WE COMPLY WITH ANTI-CORRUPTION LAWS

Anti-corruption laws apply to our business activities throughout the world. These laws are complex and the consequences for violations are severe. We comply with the anti-corruption and anti-bribery laws of the countries in which we do business.

A “bribe” is generally anything of value—including money, gifts, discounts, favors, and entertainment—that is given in an attempt to improperly influence the recipient’s actions or decisions. We cannot offer or accept a bribe, or “kickback,” as a reward for making or fostering business arrangements.

Commercial Bribery

We must be cautious to never engage in commercial bribery or give the appearance of doing so. “Commercial bribery” includes any situation where something of value is given—to us or by us—in the hopes of improperly influencing a business action or decision. This is not allowed whether done directly or indirectly through a third party.

Q Layla, a Vehicle Repair Supervisor, is married to Jason, who manages an auto repair shop. The contract for car maintenance at a branch within Layla’s area is up for renewal, and she has not been satisfied with the current vendor. Layla would like to award the contract to her husband’s business instead.

Since she has approval over this contract, can she award it to anyone who is qualified? Is this ethical?

A No, Layla has a conflict of interest in this situation because of her personal tie.

She should hand this decision to her supervisor so that the vendor selection can be made impartially and with the Company’s best interests in mind. Even if Jason’s business is the best candidate, the selection would seem biased and unfair if the decision was made by Layla.

Government Officials

Dealings with government officials require heightened care. You should never provide anything of value to a government official in return for an official action.

There are specific laws that prohibit bribes or attempts to bribe government officials, employees of entities in which a government has a controlling or ownership interest (such as an Airport Authority), political party officials, or candidates for public office. Many governments are taking steps to combat corruption and many countries have specific, stringent laws against it.

If you interact with government officials, be sure to review all applicable policies. Raise any questions promptly with your supervisor or the Legal Group.

For more information, refer to the [Anti-Corruption Policy](#). If your business is with the U.S. Government, you should also refer to the [U.S. Federal Government Handbook](#).

Third Parties

We cannot hire third parties to do something we ourselves are not allowed to do. Remember, our agents and consultants are held to the same rules that we are. For example, the Company may be liable for indirect payments even if we do not know, but should know, that the payment is being made to influence a business action or decision.

For more information about anti-corruption and bribery refer to the [Anti-Corruption Policy](#) and the section of the Code above titled “Gifts and Entertainment.”





Nigel has been trying to close a deal with a local company. He has named his final price, which the other company has rejected. Before leaving the meeting, the representative of the other company says, “You know, we’re not that far apart, and it really is in both our companies’ interest to get this done. How about we just split the price difference? And to show our appreciation for being such a good partner, we could do something nice for you. Our company has four seats at midfield for this week’s playoff game. I’m sure you and your family would enjoy going to the game.”

What should Nigel do?



Nigel should not agree to this deal. The representative is trying to bribe him in order to secure better pricing.

While he may have the latitude to split the price difference after naming his final price, if he were to do that in exchange for sporting event tickets he would be in violation of our Anti-Corruption policy and could also be in violation of laws that might subject him to fines and imprisonment. Instead, Nigel should refuse the deal and report the activity to his supervisor for follow-up. No deal is worth compromising the integrity of the Company.

INSIDER TRADING

To do our jobs effectively, we may have access to “inside information” about the companies we do business with that is not available to people outside the Company.

“Inside information” is material information that is not available to the public, or information that a reasonable investor would likely consider important in making a decision to buy or sell a security. Remember that even information about events or actions that are not certain to happen—such as the possible signing of a contract or sale of a subsidiary—can be considered inside information.

Buying or selling the securities of a company while you are aware of inside information about that company is considered “insider trading.” This practice is illegal, and so is “tipping,” or advising others to buy or sell securities based on inside information.

If you have any questions, refer to the [Insider Trading Policy](#) or consult the Legal Group.

WE COMPLY WITH COMPETITION LAWS

We believe in vigorous competition, but we will always compete in an ethical manner. Information about market trends and about our competitors, customers, franchisees, and suppliers is a valuable asset to us. We must only gather this information in legal and ethical ways, never by theft or deception.

Acceptable methods of gathering information include any source available to the general public, such as published articles or Internet research, surveys conducted by consultants, or information provided by customers or vendors as long as they are not violating an existing confidentiality agreement or offering the information to us in return for a preferential business deal. It is never all right to ask a colleague to reveal confidential information about a former employer or a business partner or customer to reveal competitive information that they are required to keep confidential.

If you inadvertently learn of information you suspect may be confidential, you must not share it or use it without first receiving advice from the Legal Group. You should not use information you have not acquired legally.

Competition laws prohibit practices that restrain trade. In complying with competition laws, we must avoid discussing any of the following with competitors:

- Division or allocation of markets, customers, or territories
- Prices or price-related information, such as promotional spending, terms, costs, marketing, or bids for work or contracts
- Limitation of services provided

Competition laws also generally prohibit entering into formal or informal agreements with suppliers or customers that may restrict competition. Such agreements include fixing resale prices, pricing below cost, boycotting particular customers or suppliers, and in some cases, providing exclusive or “most-favored” arrangements.

Remember that even the appearance of collusion can pose serious problems for the Company, so if a competitor attempts to discuss any of these topics, you should stop the conversation immediately and report it to the Legal Group. Be especially mindful of your conversations at industry association meetings or other events where you are likely to interact with our competitors.

Be mindful of your conversations.



Violations of competition laws can result in serious consequences—including criminal sanctions—for the Company as well as for the individuals involved. If you have marketing, sales, or purchasing responsibilities, you should be familiar with the competition laws that apply to your job.

If you need further guidance, refer to the [Competition Policy](#) or seek advice from the Legal Group.



Cathy is the manager of an Enterprise rental branch at a large airport, and she is good friends with Sofia, who manages a branch of another car rental service at the same airport. Sofia comments that business has been a little bit slow lately, and she is having trouble meeting her financial targets. She says, “Why don’t you and I both raise our rates? We’d make more money.”

What should Cathy do?



Cathy should end the conversation immediately and tell her supervisor about it.

What Sofia is suggesting is called “price-fixing,” and it is illegal. We make all pricing decisions independently, never by colluding with other companies. For advice about competition law, contact the Legal Group.

WE PROTECT COMPANY ASSETS AND INFORMATION

Theft, carelessness, and waste have a direct impact on our brand, reputation, profitability, and ultimate success, so we must all take responsibility for the Company’s assets and expenditures. These assets are both tangible and intangible. Our physical assets include our supplies, equipment, facilities, vehicles, and documents. We are expected to use these assets in a professional and ethical manner, for business purposes only, maintain them in a good condition and secure them properly to protect them from compromise, damage, or theft.

To protect our brand and maintain our competitive advantage in the marketplace, we also have a duty to protect the Company’s intangible assets: confidential information and intellectual property. This includes customer and employee personal information, trade secrets, financial information, computer files, vehicle telematics data, customer lists, and marketing plans. We protect this information, in part, by limiting access to those who have a business need to know it, securing the systems that transmit or store it, and ensuring our use of the information complies with privacy laws. This means, in part, that we properly collect and use personal information in accordance with our [Privacy Principles](#), [Global Privacy Policy](#), and [Personnel Policies Summary](#). As a rule, we take every precaution necessary to avoid the improper release of proprietary or confidential information. For more information, refer to the [Data Classification Policy](#).

If you suspect or know of any misuse or compromise of the Company’s assets, or the making of improper expenditures, you are encouraged to report it.



Our doors are always open.

WE UPHOLD RESPECT IN OUR WORKPLACE

We believe that the success of our mission depends on the contribution of every member of our team. We are dedicated to providing each other with an atmosphere and culture that allow us to openly share ideas and feedback, resolve problems, and work effectively as team members to exceed our customers' expectations by creating a pleasing business experience.

More specifically, we are committed to the following:

- Respect for differences in the backgrounds, experiences, and perspectives of each other, our customers, suppliers, and business partners
- An environment free from discrimination against an employee or applicant for employment based on race, color, religion, sex, national origin, disability, age, sexual orientation, gender identity, veteran status, or any other status protected by law
- An environment free from intimidation and harassment of any sort

While harassment may have different definitions in various locations, unlawful harassment is any unwelcome behavior toward another person relating to a person's legally protected characteristics that have the purpose or effect of creating an intimidating, hostile, or offensive

work environment. Such conduct may be physical, sexual, or psychological and may include:

- Unwanted sexual attention
- Derogatory comments, slurs, or name calling
- Displays of offensive or derogatory posters, pictures, drawings, or gestures
- Assault, unwanted touching, bullying, or intimidation

If you feel that you or someone else is being harassed or discriminated against, contact any of the resources listed in the "How to Report Concerns and Where to Go for Guidance" section above. Your concerns will be investigated and appropriate disciplinary action will be taken, as necessary. Remember, the Company prohibits acts of retaliation against you for reports of harassment or discrimination.

Please refer to the [Personnel Policies Summary](#) for more information.

WE VALUE THE SAFETY AND HEALTH OF EMPLOYEES

The Company values a safe and healthy workplace for us all. To reach that goal, we must always observe traffic laws and safe driving practices. This means we follow



Aisha works in a rental location, and she sometimes works evening shifts with her coworker Ron. He often compliments her appearance or makes suggestive comments. He says he's "just kidding," but it's starting to make Aisha uncomfortable.

What should she do?



Aisha should advise Ron that she is uncomfortable with his comments and ask him to stop. She may also wish to speak to her supervisor or the Human Resources Department about Ron's behavior as these unwelcome comments could qualify as harassment.

We want to create a work environment where everyone feels valued and respected, and we never tolerate harassment.



safe working procedures at all times and actively work to prevent accidents. We also observe all posted safety-related signs and use all prescribed safety and protective equipment. If you become aware of any threat to the safety of a fellow employee, customer, visitor, or facility, report it immediately to your supervisor.

The use, sale, possession, manufacture, or distribution of any illegal drug or unauthorized controlled substance (including marijuana) by employees is prohibited. The consumption of alcohol is prohibited while working, whether on Company premises or offsite, and while driving Company vehicles. Reporting to work under the influence of alcohol or drugs is also prohibited.

The Company will not tolerate threats, violent acts, or any other form of workplace violence. If there is a violent incident in the workplace, the aggressors will be subject to disciplinary action, up to and including termination, as well as criminal prosecution. Report any form of workplace violence to your supervisor.

You may refer to the [Personnel Policies Summary](#) for more information.

WE SUPPORT FAIR AND JUST EMPLOYMENT PRACTICES

The Company will not tolerate child labor, forced labor, or any other unacceptable treatment of workers at any of our locations, and we will not knowingly partner with companies that do. Specifically, this means that we do not permit exploitation of children, physical punishment or abuse, or involuntary servitude.

The Company follows all applicable wage and hour laws, including minimum wage, overtime, and maximum hour rules.

WE USE COMPANY COMPUTER SYSTEMS PROPERLY

Our business relies on computers, electronic information, and access to network systems to ensure successful performance. It is important that you use this technology for appropriate business purposes and in accordance with

our policies. It is not appropriate to use the Company's systems to transmit junk or chain email.

Be sure to compose email, instant messages, and text messages with the same care you take in composing any other Company document. Electronic messages are lasting and recoverable written records and can easily be copied and forwarded without your knowledge or consent. You should not expect privacy when using company-owned or issued equipment or systems, including email or the Internet. The Company reserves the right to monitor email and Internet access on its computers or through its network to ensure they are used appropriately. Monitoring activities, when undertaken, will comply with any and all legal requirements.

Exercise care whenever posting to blogs, social networking sites, or chat rooms, as your posts may be interpreted as the official views of the Company. Don't:

- Share proprietary data, trade secrets, internal reports, or customer information
- Respond to online customer comments or complaints about the Company, its brands, or its industry—a dedicated team of customer service specialists monitors and addresses such issues
- Use another person's or company's property—such as images, logos, or trademarks—unless you have specific permission

For more information, please refer to the [Personnel Policies Summary](#).

WE RESPECT EMPLOYEE PRIVACY

The Company is committed to protecting the privacy of its employees' private information, including their protected health information. We will act in compliance with all applicable laws regarding the accessing, receipt, use, or disclosure of employee health or medical information.

For more information, please refer to the [Personnel Policies Summary](#).

Strengthening communities, one neighborhood at a time.

WE SUPPORT CORPORATE SOCIAL RESPONSIBILITY

We are engaged in thousands of communities of all sizes, providing strategic transportation solutions while also promoting growth and prosperity. That means we take a long-term view and focus on how best to meet customer demand and local ground-transportation needs, today and tomorrow.

In addition, the Company is firmly committed to conducting business in compliance with all applicable environmental laws, regulations, and permits.

For more information about our long-term, sustainable approach to business, refer to the [Global CSR Policy](#).

We are
engaged in
the communities
we serve.



WE SUPPORT CHARITABLE CAUSES AND THE POLITICAL PROCESS

The Company encourages us to be active in charitable and civic activities in our communities.

The Company also respects and supports the right we each have to take an active interest in political activities during our personal time. We should not, however, use Company time, supplies, or facilities for such activities without prior approval.

The Company believes in expressing its views on local and national issues that affect operations. Advocacy efforts on behalf of the Company's interests are permissible as long as they are conducted in accordance with regulations governing such activities. The Company may support the political process financially but will do so only as permitted by applicable law.



We have a responsibility to act ethically and uphold the Company's values in all our business dealings.

Our success depends on our actions. You must never do anything that could appear to be illegal or unethical—even the appearance of an improper action can be damaging to the Company's reputation and its bottom line.

When faced with a difficult situation, you should never hesitate to ask for help. You can speak to or refer to any of the resources listed in the Code of Conduct. Remember, the company will not tolerate retaliatory acts against employees that raise concerns.

With your help, we can uphold our proud tradition of doing the right thing. It's the key to our success and the most important part of our culture.

BY SIGNING BELOW, I ACKNOWLEDGE THAT I HAVE READ, UNDERSTAND, AND AGREE TO FOLLOW THE PRACTICES AND POLICIES ADDRESSED IN THE CODE.

I additionally acknowledge and agree that the Code is intended to provide a general overview of the Company's policies, and does not necessarily represent all such policies and practices in effect at any particular time. I understand that I should make contact through one of the resources listed above if I have any questions concerning the Code or observe any violations of the Code.

EMPLOYEE NAME (please print)

DATE

EMPLOYEE SIGNATURE

