



# AutoZone®

## Great People, Great Service

# OUR CODE OF CONDUCT



**ALLDATA**

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# A MESSAGE FROM PHIL DANIELE

**Sell More Parts! Have More Fun!**

Dear AutoZoners,

We are thrilled that you are a member of the AutoZone family! Whether you work in one of our more than 7,700 stores, Distribution Centers, Support Centers, ALLDATA, or around the globe, thank you for being a part of our 1TEAM and remaining laser focused on the needs of our customers.

No matter your role or location, we are all on the same team with the same, common goal—AutoZoners Always Put Customer First! AutoZone's Code of Conduct (referred to as our "Code") reinforces this commitment by building on our Pledge and Values. It strengthens our bond with fellow AutoZoners while reinforcing our commitment to the communities we serve.

The Code serves as our guide to applying AutoZone's six Values, each beginning with "An AutoZoner Always..." to the decisions we make every day. All AutoZoners are required to read, acknowledge and comply with our Code. Whenever you need clarification on the right course of action, I encourage you to refer to the resources listed here and ask fellow AutoZoners if you're unsure. Let's work together as 1TEAM to foster a culture that builds each of us up and earns the trust of AutoZone's customers.

With approximately 130,000 AutoZoners globally, you remain our greatest asset and the reason customers continue coming back. Your WOW! Customer Service is simply unparalleled and ensures our customers can safely and responsibly use their vehicles to get to work, visit friends and family, and respond to unexpected emergencies. I wholeheartedly believe that Great People, Great Service is our differentiator and captures the power of AutoZone's culture. It's what happens when we flawlessly execute our Code and our Pledge and Values.

AutoZoners, it is an honor for me to be a part of our family and work alongside each of you. I am incredibly excited about all the milestones we've reached and the goals we will meet in the future. Thank you for your passion, dedication, and commitment to AutoZone, your fellow AutoZoners and AutoZone customers.

Phil Daniele

President and CEO  
Customer Satisfaction



Give me an:

# A-U-T-O-Z-O-N-E

Who's the best?

**AUTOZONE!**

Who's number one?

**THE CUSTOMER!**

---

**AutoZoners always put customers first!**

**We know our parts and products.**

**Our stores look great!**

**We've got the best merchandise at the right price.**



## FOUNDATION OF OUR CULTURE

AutoZoners live by the AutoZone Pledge and Values and share that passion and energy by reciting the Pledge after the AutoZone Cheer. To learn more about the AutoZone culture, [click here](#).

# PLEDGE & VALUES

AutoZoners always put customers first!

We know our parts and products.

Our stores look great!

We've got the best merchandise at the right price.

**AutoZone**

**ALLDATA**

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### *An AutoZoner Always...*

#### **PUTS CUSTOMERS FIRST**

Exceed your customers' expectations by providing WOW! Customer Service and going the Extra Mile. Understand your customers' needs and solve their problems. Treat each customer as your only customer.

#### **CARES ABOUT PEOPLE**

Treat people with dignity and respect. Recognize great work and provide frequent feedback. Demonstrate concern for others and your community. Create a safe environment. Own your development and help develop others.

#### **STRIVES FOR EXCEPTIONAL PERFORMANCE**

Be accountable and honor your commitments. Act in a manner of the highest legal and ethical standards. Use resources wisely and promote a culture of thrift. Take strong initiative, act quickly and do the job right the first time.

#### **ENERGIZES OTHERS**

Share your passion for the business. Generate enthusiasm, motivate others and promote innovation. Listen and assume positive intent in others.

#### **EMBRACES DIVERSITY**

Welcome each individual's heritage, differences and unique qualities. Build teams with diverse thoughts, skills, knowledge and backgrounds. Value the ideas and opinions of others.

#### **HELPS TEAMS SUCCEED**

Actively contribute to team goals and seek opportunities to lead. Be a reliable and supportive team member. Strive for accurate and clear communication. Place team goals over personal goals.

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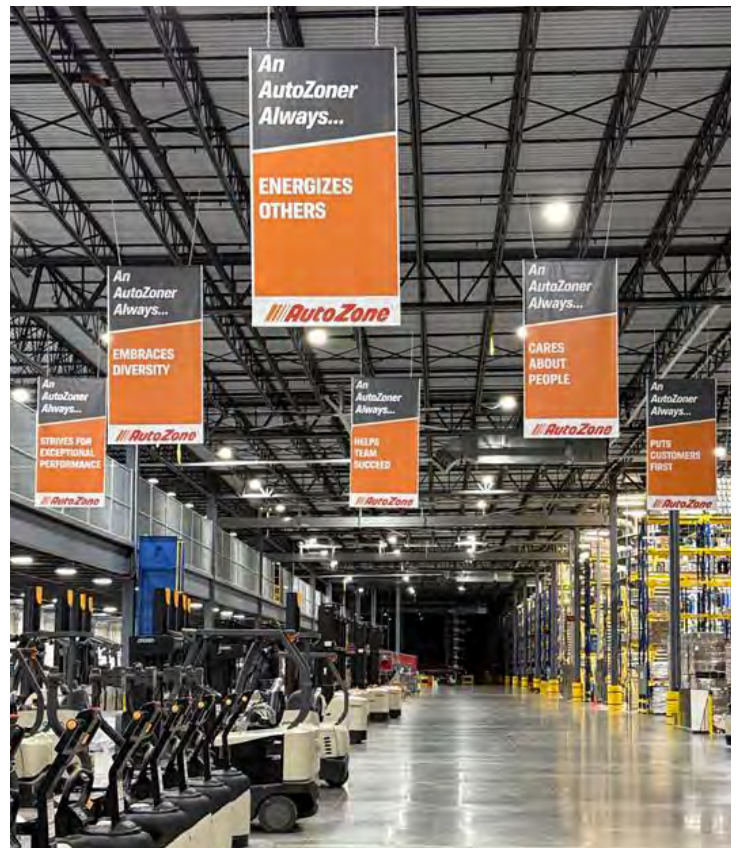
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**All policies referenced in the Code are located in [Policies on DOC](#) for AutoZoners. Additionally, the Code and Vendor Code of Conduct are located on [AutoZone.com](#) - click [here](#).**

*Photos that include AutoZoners wearing lanyards were taken at special events (i.e., National Sales Meeting, Vendor Summit, etc.)*



## WHY DO WE HAVE A CODE?

At AutoZone, we strive to Go the Extra Mile to provide service that consistently exceeds expectations. As a leader in the automotive aftermarket industry, AutoZone adheres to the highest ethical standards of behavior and integrity. We demonstrate to our customers, vendors, the communities we serve, our investors and each other that we know what it means to do the right thing.

Our Code is built around our Values and is designed to guide us to make the best possible decisions for AutoZone and in our daily work.

## WHO NEEDS TO FOLLOW OUR CODE?

All AutoZoners, including our Board of Directors, have a duty to acknowledge and follow our Code when acting on behalf of AutoZone. No one, regardless of job title or seniority, may act in a way that violates our Code or the trust of our customers.

Additionally, we expect our vendors worldwide, as well as any other third-parties with whom we work, to follow similar principles of conduct, both in their own work and when working on behalf of AutoZone.

**To learn more about AutoZone's Vendor Code of Conduct, click [here](#).**

**AutoZone's reputation is built upon AutoZoners behaving with the utmost integrity and demonstrating that they care about doing the right thing for each other, for our customers, vendors, investors and communities.**



# EXPECTATIONS AND RESPONSIBILITIES

While the Code sets forth guidelines and requirements specific to the type of work we do, AutoZoners should always adhere to the following basic principles.

## *All AutoZoners must:*

**Understand the basics.** AutoZone's Pledge, Values, Code, policies and procedures exist to help us make good decisions. We all must be familiar with them and use their guidance and direction in our daily work activities.

**Communicate.** If you have any questions about the Code, or are uncertain about any section in the Code, ask your manager or another member of management.

**Respect the law.** Beyond what is discussed in our Code, there may be other legal requirements and regulations we must follow. AutoZoners are expected to comply with all applicable federal, state and local laws.

**Speak up when something doesn't feel right.** If you think something is wrong, use AutoZone's Problem-Solving procedures. When you suspect misconduct, trust your instincts and tell your manager or another resource listed in this Code.

## *AutoZone Managers at all levels have an added responsibility to:*

**Lead by example.** Set the bar high for other AutoZoners and inspire them to meet our standards.

**Open door policy.** Make sure AutoZoners feel comfortable asking questions and reporting concerns.

**Be in the moment.** When an AutoZoner stops to speak with you, give them your undivided attention.

**Be alert.** Take immediate action to address possible misconduct. If you need help, use our Problem-Solving Procedures to get the right people involved immediately.

**Promote development.** Help AutoZoners drive their development through effective coaching and by promoting continuous learning and professional growth opportunities.



# GOING THE EXTRA MILE

Every AutoZone title includes 'Customer Satisfaction' as a reminder of our commitment to putting customers first. To build satisfaction and customer loyalty, AutoZoners always look for ways to exceed our customers' expectations and Go the Extra Mile.

AutoZoners who go the Extra Mile:

- Are unfazed by obstacles
- Do without being asked
- Go above and beyond the call of duty
- Cannot do enough for customers
- Exceed expectations
- Have a passionate commitment to customers that inspires and motivates other AutoZoners
- Consistently do more than expected
- Maintain a commitment to customer satisfaction that is immeasurable, phenomenal, stupendous; simply put—out of this world

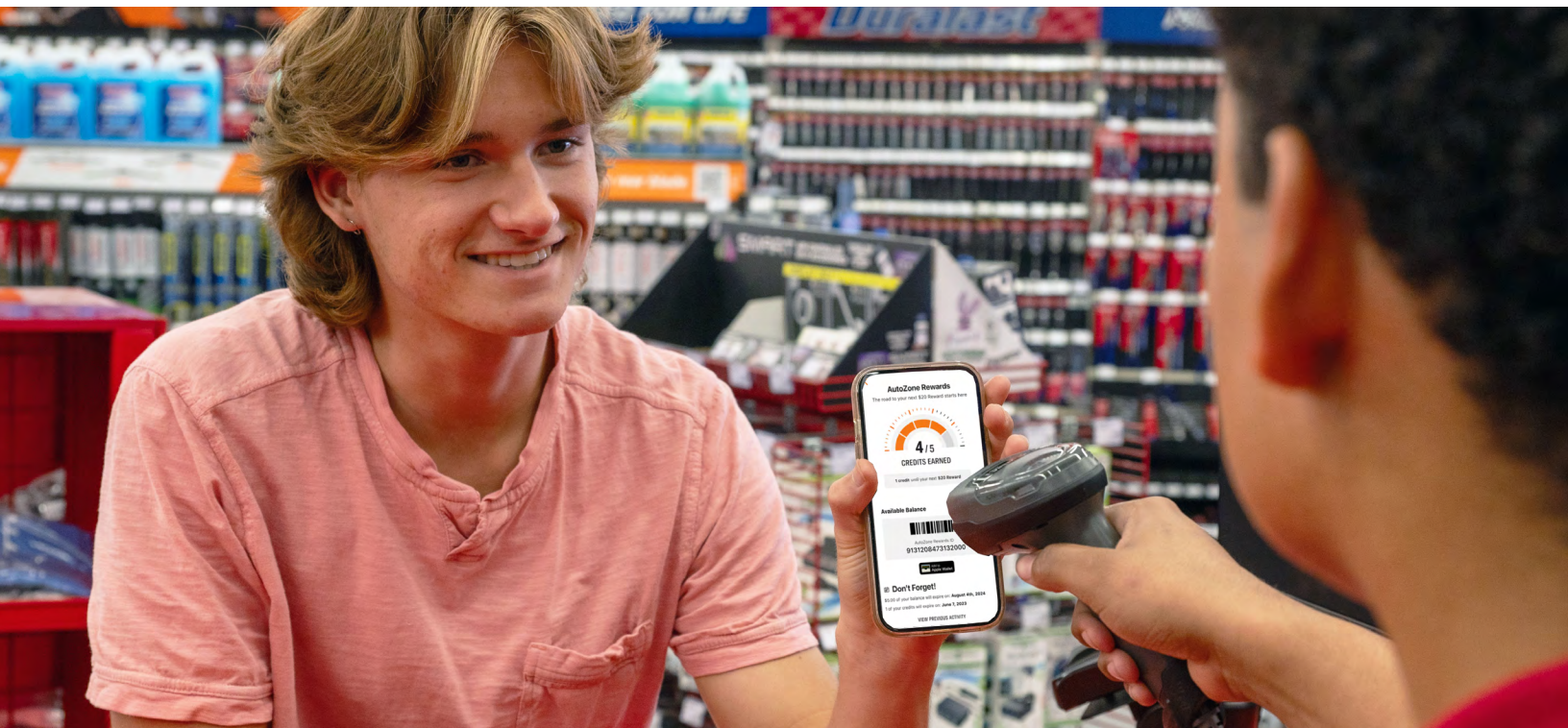
We are committed to providing WOW! Customer Service, and the Extra Miler pin represents our highest award for outstanding customer service.

## DID YOU KNOW?

### THE EXTRA MILER PIN

The Extra Miler pin was designed by Lynda Ireland and it represents the highest award for outstanding customer service.

- The circle represents endless possibilities
- The color gold means excellence
- The color red means energy
- The triangular highway represents going the Extra Mile
- The upright triangle means 'aim for summit of success'





# MAKING DECISIONS THAT ARE ALIGNED WITH AUTOZONE

While the Code sets forth many guidelines and requirements specific to the type of work AutoZoners do, we follow our Values and these basic principles to guide our decision-making. We may not always know if a decision is based on legal or ethical principles. If you are uncertain, reach out to your next level manager, a human resources manager or AutoZone's General Counsel.



*Would my decision be legal?*



*Then it could have serious consequences for you and AutoZone. Never do something you know is against the law!*



*Is it consistent with our Pledge, Values, Code and policies?*



*Then it isn't a good idea. We are required to always follow the laws and regulations applicable to our work. In addition, the expectations set by our Pledge, Values, Code and policies are what define us as a company and as AutoZoners.*



*Does it benefit AutoZone, our customers and my fellow AutoZoners?*



*Decisions that have a negative impact on our customers, our company and fellow AutoZoners may violate our Pledge, Values and Code—which means they aren't the right decisions.*



*Would I feel good about my decision if my manager, colleagues, family or friends knew—or if it ended up in the news or in social media?*



*If I would be worried about the reaction of my family, my manager or team, my fellow AutoZoners, or the public, then it's the wrong decision.*



*What if all AutoZoners made choices like this or acted the same way?*

**To learn more about AutoZone's Problem-Solving Procedures, go to DOC / Handbook.**

# REPORTING CODE CONCERNS



## WHO CAN I TALK TO ABOUT A PROBLEM?

Team success depends on us talking to each other honestly and openly. Coming forward with questions, concerns and reports of actual or suspected misconduct is part of our culture. By speaking up, you make AutoZone a better place to work and keep small issues from becoming bigger.

If you suspect a violation of the law, our Code or any policy has occurred, there are several ways to raise this concern:

1. Contact your immediate manager.
2. You can also raise concerns to the next level manager, to a human resources manager or to AutoZone's General Counsel.
3. Call AutoZone's Code of Conduct Hotline.
4. Send an email to [General.Counsel@AutoZone.com](mailto:General.Counsel@AutoZone.com), or [FCPA.GeneralCounsel@AutoZone.com](mailto:FCPA.GeneralCounsel@AutoZone.com)
5. Send a letter to: AutoZone, Inc., Attn: General Counsel, Dept. #8074, P.O. Box 2198, Memphis, TN 38103
6. Complete and submit an Incident Reporting Form by [clicking here](#). This form is accessible from any web browser.

See [page 34](#) for a list of Toll-Free Numbers to report a problem or concern.

### SECURITIES EXCHANGE COMMISSION (SEC) REPORTING

While AutoZone requires AutoZoners to maintain confidentiality with respect to sensitive business information, nothing contained in this Code (or other policies) limits AutoZoners' ability to file a charge or complaint with the Securities and Exchange Commission (SEC). AutoZoners have a protected right to communicate with the SEC and to cooperate with any investigation or proceeding that may be conducted, including providing documents or other information, without notice to or approval from AutoZone.

## WHAT HAPPENS AFTER I MAKE A REPORT?

AutoZoners' concerns are taken seriously and we review or investigate, as appropriate, each report that is submitted. After its investigation, if AutoZone finds that this Code, another policy or the law has been violated, AutoZone will take immediate action to address the situation. Depending on the type of violation, disciplinary action can include corrective action, up to and including termination of employment. In addition to termination of employment, we will also take appropriate legal action when it is warranted.

AutoZone does not tolerate retaliation against those who speak up in good faith. Speaking up in good faith means that you report your concerns honestly, timely and thoroughly. AutoZoners who make reports in good faith have no reason to fear corrective action or retaliation. AutoZoners should feel comfortable participating in any investigation of actual or suspected misconduct.



## PROBLEM-SOLVING

We follow a consistent process to solve the customer problems right the first time. First, understand the issue. Then, offer the advice and information the customer needs to help find a solution. We have testing equipment in our stores to provide customers with more information about many vehicle problems. Getting to the root cause of a customer's needs often saves them money and builds customer loyalty.

If you think you are going to disappoint a customer and do not have an answer, be sure to get a manager involved.



## PRODUCT SAFETY

Putting customers first is about providing them with safe, quality products that get the job done right. AutoZone is committed to selling products that are safe for their intended use, conform to all laws and regulations and meet industry safety standards.

When we learn about a potential product quality or safety problem, AutoZone engages with all relevant stakeholders including, but not limited to, manufacturers and government entities in a timely manner to take appropriate action.

**“The safety of our customers and AutoZoners is a top priority.”**





**WITTDJR® and Trustworthy Advice are keys to delivering WOW!  
Customer Service and Creating Customers for Life.**

## ADVERTISING PRACTICES

Our commitment to the customer means we advertise and price our products with honesty and integrity. We are transparent and clear in all of our communications. We make sales because we have the best merchandise at the right price — not because we misrepresent what we offer or tear down our competitors.

## SELLING PRACTICES

Putting the customer first means doing more than offering exceptional customer service and great-looking stores. We routinely practice WITTDJR (What It Takes To Do The Job Right)—nothing more and nothing less—and offer Trustworthy Advice to ensure our customers have the tools and information they need to successfully complete the job.

Whether they are shopping online, calling on the phone or visiting our stores, we do business with our customers honestly, truthfully and responsibly by explaining how AutoZone’s products and services meet their needs.

We support our product performance claims with facts to give customers accurate information about our products and services and how they compare to the competition.

### WHAT IF...

A customer sees an AutoZone advertisement for a new line of batteries and asks, “I noticed your competitor claims their batteries last longer. Why should I choose AutoZone instead?”

### WHAT TO DO?

The AutoZoner should be honest and transparent with the customer. Acknowledge the competitors’ claim without disparaging them. Avoid making unverified statements or exaggerations.

Apply WITTDJR and focus on what the customer needs to do the job right. Explain how AutoZone’s battery meets their specific requirements—nothing more—nothing less.

Provide Trustworthy advice and share factual, verifiable information about AutoZone’s battery performance, warranty, and reliability. If comparisons are made, ensure they are based on documented data, not assumptions.

**Remember:** *An AutoZoner Always... Puts Customers First... and Knows Our Parts and Products.*



## COMPETING WITH INTEGRITY

At AutoZone, we create customers for life by ensuring that our products and services are competitive and offer good value. We do this by competing fairly and legally. Antitrust or competition laws benefit customers by keeping the retail marketplace competitive through lower prices and more choices.

**Antitrust or competition laws keep a level playing field in the marketplace by making it illegal for companies to collaborate on pricing or share other sensitive information.**

AutoZone sets its own pricing on all the parts and products we sell. Antitrust laws make it illegal for us to make agreements with our competitors that would affect prices for our customers or vendors, make it harder for other companies to exist in the marketplace or limit consumers' access to a selection of auto parts, products or services.

It doesn't matter if an agreement is made formally or informally—is written or verbal—even the appearance of an anti-competitive agreement between two people can be perceived as a violation of antitrust laws.

To ensure that we always compete with integrity, the following topics are always off limits with competitors:

- Pricing
- Bids for Commercial business
- Division or allocation of markets, territories or customers
- Preventing a competitor from selling its products
- Confidential customer information or details

Conferences, industry associations and trade shows are business settings where AutoZoners need to be extremely careful not to discuss competitive or sensitive information. If a competitor attempts to discuss any off-limits topics with you or tries to bring you into an anti-competitive discussion, do the right thing. Tell them you won't be a part of the discussion, walk away and talk to your manager about the situation as soon as possible.



## BUSINESS AND ETHICS

**AutoZone acts in a manner of the highest legal and ethical standards. For example, this is reflected in how we handle competitor information, as well as vendors' conduct and our relationships with vendors.**

**Having information about what our competitors are doing can be a great advantage.** Such insight allows us to plan and determine new market trends that will help us better serve our customers. However, it's important to remember that any information we learn about our competitors must be obtained legally and ethically.

**When gathering competitive information, follow these guidelines:**

If your job requires you to gather information about competing companies, always use publicly available resources, such as information published:

- On a company's website or industry blog
- In a catalog, circular or a reputable magazine
- By a third-party provider
- In their stores, visible to their customers

### **AutoZoners must never...**

- **Access or use information that is not publicly available.** Only rely on sources that are openly accessible to the public.
- **Gather information through spying, eavesdropping, or any other deceptive or unethical practice.** Integrity is non-negotiable.
- **Use or share confidential or non-public information obtained from customers, vendors, service providers, or former employees of AutoZone's competitors.** Protecting sensitive information is essential to maintaining trust and compliance.

**Just as we act responsibly when collecting competitive information, we also uphold high standards in our dealings with vendors.** Our Pledge and Values commit us to doing what's right for our customers, and we expect our vendors to do the same. We never do anything to give one vendor an unfair advantage over another or show inappropriate preferential treatment.

**Building strong, ethical relationships is key to our success.** When we purchase products or services from other companies, we look at several key factors, including quality and safety records and regulatory compliance. We develop our business relationships based on quality, merit and doing what's best for our customers.

### WHAT IF...

Emiliana is a Category Manager and ten-year AutoZoner. While attending an industry trade show, she overhears two representatives from a competitor discussing their upcoming pricing strategy. Later, a former employee of that competitor offers Emiliana detailed internal documents about their future product launches in exchange for a favor.

At the same time, Emiliana is negotiating with two vendors for a new product line. One vendor offers her tickets to an exclusive event if she agrees to prioritize their products over others. Another vendor asks Emiliana to share AutoZone's internal sales data to "help them tailor their offer."

### WHAT TO DO?

- **Competitor Information:** Emiliana must not accept or use the internal documents offered by the competitor's former employee. She can only rely on publicly available resources like websites, catalogs, or industry publications.
- **Vendor Conduct:** Emiliana must decline the event tickets and notify her manager because accepting the tickets could create the appearance of favoritism and violate the Conflicts of Interest policy.
- **Relationships:** Emiliana must never share AutoZone's confidential sales data. AutoZone makes business decisions based on quality, compliance, and what's best for AutoZone and its customers—not on personal trade, perks or inappropriate exchanges of gifts or policy violation.

**Remember:** *An AutoZoner Always... Acts with Integrity and Strives for Exceptional Performance.*

See [page 22](#) to learn more about AutoZone's vendor relationships (Vendor Code) and Conflicts of Interest.

**AutoZone does business with vendors who act ethically and comply with laws applicable to their businesses and countries where they operate.**





# MERCHANDISING PRACTICES

To best serve our customers, we acquire the best merchandise at the right price and use or employ fair, accurate and truthful marketing, advertising and selling practices.

We assume positive intent in others and we want them to assume the same of us. We use analytical tools, market data and feedback from AutoZoners to help us independently set fair and competitive pricing for all products and customers.

In these situations:	What is AutoZone's Practice?
When selling our products we do not unlawfully discriminate on price...	We set and advertise our own pricing so that customers may freely decide for themselves if they want to purchase our parts and products.
When a customer asks us to match a competitor's price...	We use reliable third-party sources to verify the price offered (without contacting competitors).
When sourcing and buying parts and products from our vendors...	We do not ask for a price or promotion that we believe would cause the vendor to discriminate on price—either because the same pricing isn't available to other customers or because the promotion would be disproportionate to the size of our order.
When asking one of our vendors to match a competitor's price...	We provide truthful and accurate information to help them do so.



## CARES ABOUT PEOPLE

*An AutoZoner Always...* Embraces Diversity and Cares About People. At AutoZone, we are committed to our Values. We embrace everyone's heritage, differences and unique qualities, value the ideas and opinions of others and treat everyone with dignity and respect.

AutoZone is committed to equal opportunity for all AutoZoners and does not discriminate or tolerate discrimination. We expect all employment decisions to be made based on an individual's skills, knowledge and ability to fulfill the requirements of the position. We never make employment decisions based on a person's:

- Race or color
- National origin
- Religion
- Gender or gender identity
- Sexual preference
- Ancestry
- Age
- Marital status
- Family leave status
- Medical condition
- Disability
- Veteran status
- Other characteristics protected by law

We make all employment decisions based on job-related requirements. This applies to recruiting, hiring, training, promotions, compensation, benefits, transfers, development opportunities and all other aspects of employment with AutoZone.

We are also committed to keeping AutoZone harassment-free. AutoZone does not tolerate disrespectful or hostile behavior which includes:

- Making derogatory comments, or jokes, insults, or slurs
- Intimidating behavior
- Inappropriate physical contact to include sexual advances or other actions that could make an AutoZoner uncomfortable or create a hostile work environment

To learn more about AutoZone's Values and practices applying our non-discrimination, harassment and workplace violence policies, visit [Learning Garage on DOC](#) to complete the Respect in the Workplace Training.

**Our commitment to fairness and mutual respect also extends to our customers, vendors and candidates for employment. If you are aware of any discriminating, harassing or hostile behavior, report it to management immediately.**

## WHAT IF...

Michael, a Part Time Sales Associate, is a new AutoZoner at his local store. During his lunch break, he overhears several AutoZoners making jokes about Mary, an AutoZoner who recently returned from medical leave for a chronic condition. Comments include:

“Don’t lift that, you might break something again!” and  
“Guess we’ll have to slow down for Mary now.”

Michael feels uncomfortable because these remarks seem disrespectful and could be considered offensive based on Mary’s condition. He recalls AutoZone’s Values and Respect in the Workplace during Foundations Training.

## WHAT TO DO?

Michael should report this to an HR Representative. AutoZone does not tolerate discrimination or harassment, which includes making disparaging or offensive comments about another AutoZoner. This is an opportunity for Michael as a new AutoZoner to demonstrate AutoZone’s Value: *An AutoZoner Always... Cares About People.*

Certain kinds of conduct—that make it more difficult to get work done and maintain a positive environment—are not appropriate at work. Such conduct requires immediate action, which may include an investigation, coaching, training, corrective action and/or termination.

**Reminder: Managers who observe or become aware of alleged unlawful harassment, retaliation or discrimination must immediately report it to the HR Representative so that AutoZone can take appropriate remedial action. For additional information, refer to the Handbook in [Policies on DOC](#).**





## LABOR LAWS AND HUMAN RIGHTS

AutoZone is committed to fairness and mutual respect, and to providing competitive compensation, benefits and training opportunities. Every AutoZoner can expect to be compensated fairly, and to have performance evaluations and decisions about promotion based on merit and other objective measures, without favoritism.

Additionally, we believe that dignity and respect are fundamental rights—not just for AutoZoners, but for everyone.

AutoZone is committed to upholding basic human rights in all areas of our business. We don't condone child labor, forced labor or human trafficking, and we don't purchase products from or maintain relationships with companies that do.

## WORKING WITH VENDORS

AutoZone has a history of succeeding through honest business competition. Since we know that our vendors reflect on our reputation, we put serious thought into where we purchase the products and services that keep our business running. We commit ourselves to doing the right thing and require our vendors to do the same.

We do business with ethical, law-abiding vendors that meet our high standards, and we work with them to establish lasting relationships. We have product requirements for our product categories to ensure our standards are met. We avoid doing anything to give one vendor an unfair advantage or unfair preferential treatment over another.

**Regardless of whether you're working with a customer, vendor or competitor, anyone who does business with us can expect AutoZoners to act with integrity, fairness and honesty.**



## HEALTHY WORKPLACE

AutoZoners deserve a safe and productive workplace that allows them to work and to be at their best every day. That's why AutoZone does not allow AutoZoners to possess, use, distribute, sell, offer, or be under the influence of alcohol, drugs or any other intoxicating or mind-altering substances (including prescribed drugs) while at work. This applies to all AutoZoners conducting company-related business, whether on or off company property, or while driving a company, leased or personal vehicle. **To learn more about AutoZone's driving (fleet) policies, click [here](#).**

If you have a drug or alcohol problem, you are encouraged to seek assistance or contact your HR Representative for information about AutoZone's drug and alcohol rehabilitation program where applicable.

### **FREE FROM VIOLENCE, INTIMIDATION AND BULLYING**

AutoZone's commitment to a safe and healthy work environment means we do not tolerate violence or threats of violence, intimidation or bullying, anywhere AutoZoners are present including but not limited to AutoZone premises, at AutoZone sponsored events and/or customers' premises. We also prohibit the possession of weapons on AutoZone property, including in our parking lots or in personal or company vehicles, unless otherwise authorized by state law.

Speak up if you are aware of any threats or potential violence. In these cases, you should report the situation immediately to a manager or to Human Resources. You may also call the Workplace Violence Hotline.

If you or others are in immediate danger, call the local authorities first—then report the matter to AutoZone.

We expect managers to take these reports seriously and immediately respond to threats and aggressive or violent behavior. It does not matter whether the threat or act of violence comes from an AutoZoner, a customer or others—appropriate attention is required.

**If you are a manager and need help handling a violent or threatening situation, immediately ask for assistance from Loss Prevention, Human Resources and/or management.**

**Workplace Violence Hotline**

**1-877-718-7728**



# PRIVACY PROTECTION - PERSONAL AND BUSINESS

AutoZone cares about people and that includes keeping their private information safe. This applies to our fellow AutoZoners, as well as our customers and others outside of AutoZone.

All AutoZoners have a responsibility to safeguard **personally identifiable information (PII)** from theft and unauthorized use.

PII includes:

- Contact information (name, address, phone number and email address)
- Employment history
- Marital status
- Government-issued identification numbers
- Any other information as defined by applicable privacy laws
- Credit and debit card numbers
- Consumer data
- Protected health information (PHI)

**PII is any information that can be used to identify, contact, or locate a person or distinguish an individual from another. PII must be safeguarded to protect customers and AutoZoners.**

If your job requires you to work with information about customers, vendors, AutoZoners or AutoZone data, it's your responsibility to keep it safe and handle it correctly.

Treat all PII as if it was your personal information and keep it secure. If you suspect any compromise of PII, report it immediately to the Information Security team (SOC@AutoZone.com).

You may never access or share personal information without a clear and authorized reason to do so.

Always follow AutoZone's policies to securely store this information and properly destroy physical copies of data, such as printouts. Never put it in the trash where it could be seen by someone else.

**To learn more about AutoZone's Record Retention Policy, click [here](#).**

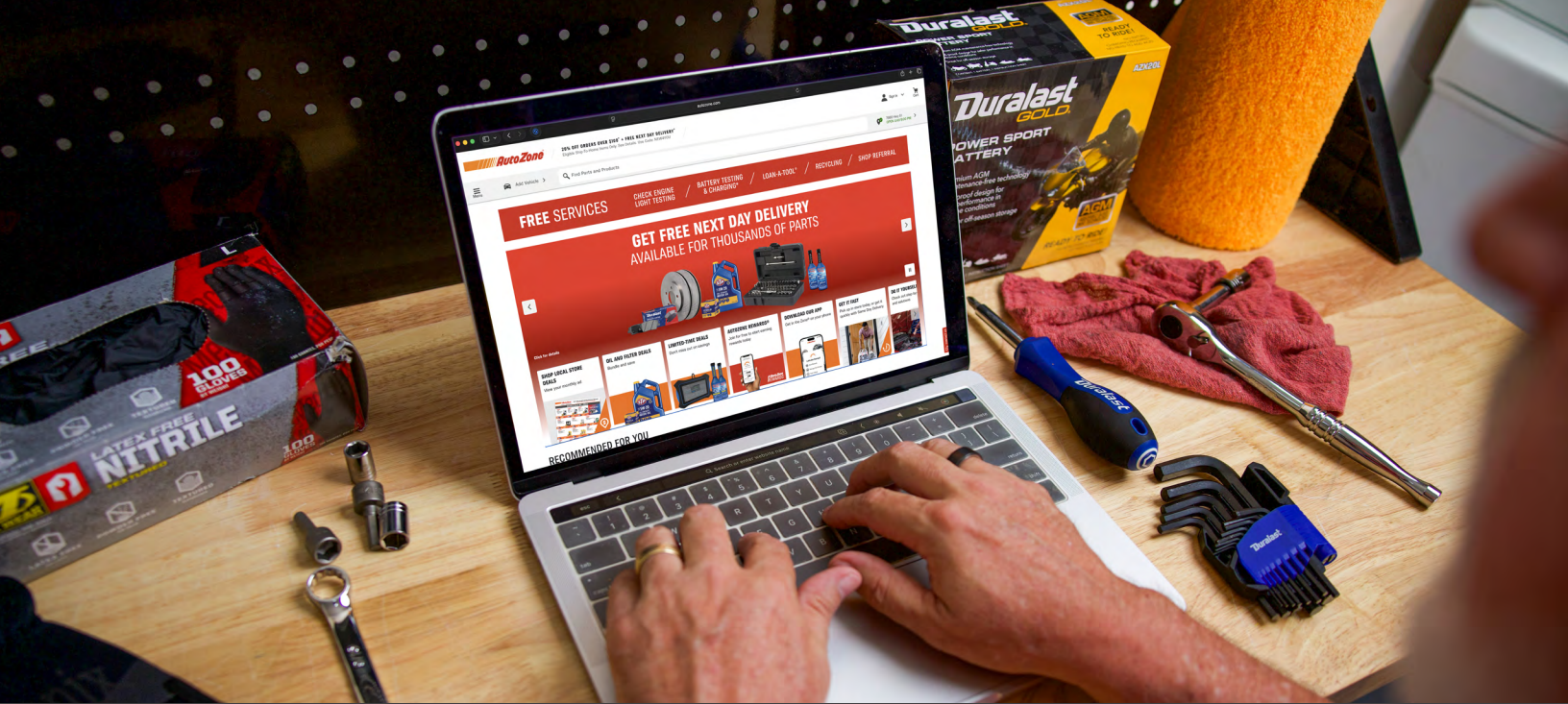
## CYBER ETHICS

AutoZoners must act with the highest ethical and legal standards, which also applies to internet usage and how we communicate on social media or other digital platforms. When posting on social media as an AutoZoner, you must include this disclaimer: These views are my personal opinions and ideas and not AutoZone's. **To learn more about AutoZone's Social Media Policy, click [here](#).**

AutoZoners should not:

- Engage in cyberbullying
- Use rude or offensive language
- Use another AutoZoner's credentials/passwords
- Have unauthorized access to, or use of, a computer or other communication devices assigned to another

**To learn more about AutoZone's Information Security Policy, click [here](#).**



## USING RESOURCES WISELY AND CULTURE OF THRIFT

One of the reasons for AutoZone's exceptional performance is because of our dedicated AutoZoners and their wise use of our resources. We must always respect AutoZone's physical assets, information and other resources and strive to use them wisely.

Every day, we use AutoZone's physical assets such as electronic equipment, mobile devices, work supplies, facilities, company funds and time. We are responsible for protecting these assets from damage, theft, misuse and waste.

AutoZoners are expected to practice a culture of thrift. This means we do not spend money unnecessarily or waste resources including individual time and effort. Just as our customers rely on us to provide them with What It Takes To Do The Job Right (WITTDJR), AutoZone relies on us to use the right resources to do our jobs—nothing more, nothing less.

The same goes for any technology we use in our work, such as mobile and electronic devices, computers, telephones, email and internet access. These resources are intended to be used for AutoZone's business purposes. They should never be used for personal reasons, another job or business, to access, send, transmit or download offensive, inappropriate, illegal materials, or anything that violates this Code.

AutoZoners might have a personal need to use company telephones, internet access and other resources. Such instances are acceptable so long as they are reasonable and do not interrupt, interfere or distract from work or from serving customers.



To provide WOW! Customer Service, it is essential to make sure we do the right work at the right time and use company assets for AutoZone business.



## HANDLING CONFLICTS OF INTEREST

Living our **Pledge and Values** each day means we make decisions in the best interest of our customers and AutoZone. Sometimes, an AutoZoner's personal goals may conflict with AutoZone's interests and these situations are commonly referred to as a **conflict of interest**.

If you have or suspect you may have a conflict of interest, talk with your manager immediately. Having a conflict doesn't necessarily mean that you've done anything wrong, but it must be brought to management's attention, so that any conflict or issue can be reviewed and resolved quickly and appropriately.

**For further clarification, refer to AutoZone's Conflicts of Interest Policy on [DOC](#).**

### **OUTSIDE EMPLOYMENT AND OTHER ACTIVITIES**

Depending on personal circumstances, it may make sense for AutoZoners to take on another job outside of AutoZone. However, if a second job interferes with your work at AutoZone, it can create serious conflicts with scheduled working hours, scope of work, company, etc. Speak with your manager and HR. Never use AutoZone assets, data, or resources for personal matters including another job or business. Outside employment includes, but is not limited to:

- Self-employment
- Paid or unpaid consulting or advising
- Advisory board membership
- Advising a vendor, supplier, or customer
- Endorsing on behalf of AutoZone verbally or in writing, whether for value or not
- Commenting on the industry or AutoZone or parts and products, whether compensated or not
- Working for a competitor that could potentially divert business opportunities from AutoZone

### WHAT IF...

Alex, a full-time AutoZoner, recently started working part-time for a local automotive repair shop on weekends. While reviewing inventory at AutoZone, Alex notices that the repair shop is a regular customer and often receives discounts through AutoZone's Commercial program. Alex wonders if continuing this outside job could create a conflict of interest, especially since he has access to pricing and discount information at AutoZone.

### WHAT TO DO?

Alex should immediately disclose this outside employment to his HR Representative and Manager. AutoZone's Code of Conduct requires employees to avoid conflicts of interest, which include situations where personal activities or outside employment could influence—or appear to influence—business decisions.

**Remember:** *An AutoZoner Always... Knows AutoZone's Policies and Helps Teams Succeed.*

## FAMILY AND PERSONAL RELATIONSHIPS

Referring family and friends to open positions at AutoZone is a great way to strengthen the AutoZone team—but working with family and friends can create a conflict if we aren't careful. AutoZoners should never be able to directly or indirectly supervise or be supervised by a family member or person with whom you have a romantic relationship. If you become related to or develop a personal relationship with a vendor, Commercial customer or anyone doing business with AutoZone, notify your manager, SVP, HR or AutoZone's General Counsel.

### WHAT IF...

Taylor is a DC Manager and two-year AutoZoner. Taylor's siblings started working for one of AutoZone's local suppliers. During a routine review, Taylor realizes the supplier is bidding for a new contract with AutoZone. Taylor wonders if putting in a good word to ensure the contract is approved would create a conflict of interest since it involves a family member.

### WHAT TO DO?

Taylor should immediately disclose the relationship to his HR Representative or Manager and remove himself from the decision-making process. AutoZone's Code of Conduct requires AutoZoners to avoid situations where personal or family relationships could influence—or appear to influence—business decisions. By reporting this, Taylor ensures transparency and protects both himself and AutoZone from potential ethical concerns. HR will review and assign another decision-maker to maintain fairness and compliance.

**Remember:** *An AutoZoner Always...Acts with Integrity and Puts Customers First.*

## FINANCIAL INTERESTS AND INVESTMENTS

Having a financial interest in an AutoZone competitor or vendor can divide our loyalties, or appear to divide them, if it is substantial enough to make it difficult to put AutoZone's best interest ahead of the other companies. This also applies to owning a material interest in the securities of any competitor, or of a customer, vendor or supplier, service provider or other entity doing business with AutoZone, including family-owned businesses. Being a part of a publicly traded company, you should also know that directly owning securities in vendors, competitors, or customers can create insider trading liability for you. "Securities" include stocks, options, bonds, partnership and other ownership interests. An AutoZoner is considered to have a "material interest" in an entity when the AutoZoner directly or beneficially owns five percent or more of the securities of the entity or securities of the entity having a fair market value of \$500,000 or more. An AutoZoner "directly owns" securities that are registered in their name or in the name of a broker or nominee. An AutoZoner "beneficially owns" securities that are held for their benefit in a partnership, trust, profit sharing plan or other entity, or in the name of an immediate family member. For any questions about your financial interests or investments and this Code, please contact the Senior Vice President, General Counsel.

**An AutoZoner could be held personally liable for violating these terms. AutoZone could be sued as a company and the AutoZoner could be sued personally.**

## BUSINESS OPPORTUNITIES

Another common type of conflict could occur when you take advantage of an opportunity that comes to you because you work for AutoZone. If, through your work as an AutoZoner, you learn about a potential business venture or a financial investment, it may create a conflict for you to pursue it without first discussing the details and seeking approval. The same goes for any information we learn about our customers and vendors. We have a commitment to protect their information. Always remember that, in the course of our daily work, we should never use our inside knowledge or position to obtain a personal financial gain.

## ADVISORY OR BOARD MEMBERSHIPS

Demonstrating concern for our communities is part of AutoZone's Values. One way to do this is by serving on a board of directors of a non-profit organization. This kind of community service doesn't require prior approval—so long as the position doesn't interfere with your responsibilities as an AutoZoner or doesn't create a conflicts of interest. However, serving on the board of directors for another company or an advisory board of a for-profit company requires advance review and approval. First discuss and seek approval from your manager and Senior Vice President (SVP) and then from AutoZone's General Counsel.

To learn more about AutoZone's Conflicts of Interest Policy, click [here](#).



# GIFTS, MEALS AND ENTERTAINMENT

The exchange of gifts, meals and entertainment is common practice in some countries and businesses and can foster better relationships with customers and vendors. However, there are limits to the type of gifts, meals and entertainment that are acceptable to AutoZone.

The key is understanding intent. Accepting gifts, meals and entertainment can cause a conflict of interest (or the appearance of a conflict) between our personal interests and our responsibilities as AutoZoners. Review AutoZone's Conflict of Interest Policy for guidance on this topic.

Do not offer or accept a gift or any other item of value in exchange for a business decision or if doing so would appear to obligate either the giver or the recipient about AutoZone.

Gifts, meals and entertainment from anyone we do business with or a potential vendor or other third-party are only acceptable if they are approved in advance by your manager and meet the criteria set forth in the Conflicts of Interest Policy on [DOC](#).

Gifts, Meals, Entertainment	Acceptable Criteria	Examples	Unacceptable Criteria	What Should the AutoZoner Do?
Gifts	<ul style="list-style-type: none"> <li>• Gifts of nominal value that would be impractical for the AutoZoner to return to the sender</li> <li>• Infrequent</li> <li>• Unsolicited (no one requested it)</li> </ul>	<ul style="list-style-type: none"> <li>• Perishable goods received during the holidays that can be distributed equally among the team</li> <li>• Samples and/or promotional items (ex: shirt, laptop case or other accessory with a company logo or of nominal value)</li> </ul>	<ul style="list-style-type: none"> <li>• Lavish or excessive</li> <li>• Cash, *stock options, gift cards, credit, loans, etc.</li> <li>• An event where the content, performance or environment is counter to or in violation of our Values, Code or any other policy.</li> <li>• Accepting gifts or money in exchange for GOTTCChA (Go Out To The Customers Automobile)</li> </ul>	Even if the gift is acceptable, or unacceptable, it must be reported to your manager.
Meals	<ul style="list-style-type: none"> <li>• Reasonable, infrequent, business-related</li> <li>• AutoZone requires at least two AutoZoners to be present during a business meal</li> <li>• Pre-approval from manager is required</li> </ul>	<ul style="list-style-type: none"> <li>• Joining the team and vendor for a meal in a public restaurant</li> </ul>	<ul style="list-style-type: none"> <li>• Lavish or excessive</li> <li>• Attending alone</li> <li>• Attending frequently</li> </ul>	<p>You must seek pre-approval from your manager. AutoZone requires at least two AutoZoners to be present during a business meal.</p> <p>Attending sports or entertainment events* requires pre-approval by a Vice President, Assistant General Counsel, or General Counsel. (*Events must be appropriate for all AutoZoners and consistent with our Values, Code and other policies. Refer to "Unacceptable Criteria" (above) and related policies.)</p> <p>If the provider will not be present for the event, or travel is involved, advanced approval from your leadership is required.</p>
Entertainment	<ul style="list-style-type: none"> <li>• Not excessive and within AutoZone's culture and Values, or customary business practice</li> </ul>	<ul style="list-style-type: none"> <li>• Tickets to a concert or baseball game</li> </ul>	<ul style="list-style-type: none"> <li>• Lavish</li> <li>• Excessive and may inappropriately influence (or appear to influence the judgment of others, or our judgment)</li> </ul>	

**BEST PRACTICE:** Whether a gift is acceptable or not, it must be reported to your manager. When in doubt, **do not** accept a gift or entertainment.

## GOVERNMENT OFFICIALS

AutoZoners must never accept, solicit, offer, or give gifts or anything of value to a government official, agent or representative, candidate for office or any other government employee. This includes third-party service providers who engage with government entities and officials on behalf of AutoZone. This also means we must never offer or accept bribes, kickbacks, gifts or other anything of value including facilitation or other payments. See [page 31](#) to read about AutoZone's commitment to "Business Free from Corruption. To learn more about AutoZone's policies on Compliance with Anti-Corruption Laws and the Vendor Code of Conduct, [click here](#).



### WHAT IF...

You're a Category Manager. A long-time vendor invites you to a courtside NBA game next month, including dinner at a high-end restaurant. They mention it's "to celebrate our partnership" and add, "We hope this strengthens our relationship as we discuss next quarter's allocations." You're flattered, and the vendor assures you, "No strings attached."

### WHAT TO DO?

Pause and assess intent:

- Ask: "could accepting this create a conflict of interest, or the appearance of a conflict?"
- The timing suggests it could influence—or appear to influence—a business decision.

#### **What are AutoZone's Conflicts of Interest Policy requirements?**

- Do not accept any gift, meal, or entertainment that could be seen as obligating you to the vendor regarding an AutoZone decision.
- Manager pre-approval is required for any gift/meal/entertainment from anyone we do business with or a potential vendor/third-party, and the offer must meet policy criteria (reasonable, customary, not lavish, directly related to a bona fide business purpose, and compliant with the law).
- Distinguish "entertainment" from "gifts"
  - Entertainment (e.g., sporting events, performances) implies both parties attend together. This can heighten the perception of influence.
- Evaluate whether the type, value, timing, and context meet our criteria—and whether the business will be substantively conducted or if it is a primarily social event.
- Escalate and document.
- Notify your manager and provide: the nature of the event, estimated value, whom will attend, business purpose, timing relative to decisions and related negotiations.

**Remember:** *An AutoZoner Always... Acts with Integrity and Strives for Exceptional Performance.*



## ACCURATE BOOKS AND RECORDS

AutoZoners strive for exceptional performance in all that we do and hold ourselves accountable for our actions. This includes our responsibility to keep financial and operational books and records that are accurate, complete and in compliance with AutoZone policies and legal requirements.

Accurate record-keeping ensures that we maintain the integrity of our financial statements and other disclosures. It also allows us to make sound business decisions. Examples of books and records include, but are not limited to, sales data, time sheets, bills, invoices, expense reports, payroll records, inventory records, regulatory filings and other essential AutoZone data.

AutoZoners must never falsify, alter, or conceal any company information or otherwise misrepresent information on a company record. All transactions and records, no matter what dollar amount involved, must be accurately and timely documented, approved and recorded. Transactions and financial records include:

- Invoices
- Expense reports
- Payroll records
- Sales or inventory data

If you notice any error in a company record, or a failure to follow our internal controls and processes, speak up and report it immediately.

If you receive a records request from a third-party, such as an outside auditor or governmental agency, immediately notify your manager and the Legal department, so they can help you understand the process and what's expected of you.

**To learn more about AutoZone's Record Retention Policy, click [here](#).**



# AVOID INSIDER TRADING

AutoZone is a publicly traded company, therefore, certain facts about our business may be considered “**inside information**”. It is illegal to trade securities (stock) based on this insider information.

Insider information is both material and non-public in nature. Material information is anything that reasonable investors might consider important when they make an investment decision, like buying or selling stock. Information is usually considered non-public until one full trading day has passed since the information has been publicly announced. It is illegal to use inside information for personal or financial gain, or to “tip” others to trade based on that information.

Examples of inside information include:

- Non-public financial results such as sales and earnings data
- Planned actions regarding AutoZone stock
- Important lawsuits
- Significant transactions
- Senior management changes

AutoZone stock is publicly traded on the New York Stock Exchange (NYSE), and the market price of the stock is based on what the public knows about AutoZone. Having inside information could give an investor an unfair advantage in deciding to buy or sell the stock.

Trading on or tipping others about inside information about AutoZone or the companies we do business with is illegal and unethical. Sharing inside information can mean serious civil and criminal penalties for AutoZone and for the individual AutoZoners involved.

Inside information isn't limited to AutoZone, it also includes our vendors. We have a duty to protect that information and keep it confidential. It is illegal to use inside information for our own benefit or for the benefit of others. Inappropriate or unauthorized disclosure or use of material or confidential information may lead to disciplinary action including termination of employment.

**To learn more about AutoZone's Insider Trading Policy, click [here](#).**

Examples of illegal insider trading:

- AutoZoners tipping family and friends or anyone off to non-public, financial results including sales and earnings so they could buy or sell AutoZone stock before the information is publicly released.
- An AutoZoner who learns about a vendor's non-public sales trends and earnings data buys or sells stock of that vendor.
- An AutoZoner passing non-public information about an upcoming acquisition to a friend, who trades in AutoZone stock for profit.

See [page 34](#) to learn how to report concerns about Insider Trading or Financial Fraud.

# RESPONSIBLE USE OF COMPANY ASSETS

AutoZone has many different types of assets, and we must use these assets responsibly to prevent loss, damage, theft, fraud or waste.

## PHYSICAL ASSETS

Physical assets can include our buildings, inventory, computers, office equipment, company vehicles and more. Follow appropriate security procedures to protect these assets and ensure they're only used for authorized and legitimate business purposes.

## CONFIDENTIAL INFORMATION

Some of our most important resources aren't physical objects. Confidential information is one of the most critical components of our business. It includes any non-public information about AutoZone, our customers, our fellow AutoZoners, our vendors and our business that is non-public and could be harmful to us if it falls into the wrong hands.

Information like our earnings, pricing, product costs, business plans and strategies, customer and AutoZone information are all considered confidential, meaning no one outside of AutoZone should have access to them without the proper authorization. Even other AutoZoners shouldn't have access to certain types of confidential information if their jobs don't require them to use it.

Everyone has a responsibility to protect our confidential information by understanding what information is non-public and only sharing confidential information with parties who are authorized to receive it and who follow appropriate security practices.

## INTELLECTUAL PROPERTY

Intellectual property (IP) can include things like company logos, photos, videos and innovations.

AutoZone regularly produces IP, such as our distinctive branding videos that celebrate our culture, or the strategies we develop to get the right products into our customers' hands. All of this, as well as our services and products, business records, manuals and know-how, contain IP, and all AutoZoners are responsible for protecting it.

## OTHER CONFIDENTIAL INFORMATION AND ASSETS

Unauthorized use of other company's confidential information, IP or assets is not only in violation of our Values and policies, but it may also be illegal. We must never use another company's confidential or non-public information without their prior and express written permission.





## ENGAGING WITH THIRD-PARTIES AND EXTERNAL STAKEHOLDERS

AutoZoners often want to share their enthusiasm for our business with others. However, only authorized AutoZoners may speak about our company in certain situations. Otherwise, there is the potential risk of spreading misinformation and losing the trust of our customers, investors and communities.

If you receive questions from the news media, third parties and others about AutoZone, our subsidiaries or our operations, do not respond on your own. Instead:

- Refer media to our Media Relations contact, via email at [Media.Relations@AutoZone.com](mailto:Media.Relations@AutoZone.com)
- Refer analysts and investment community members to the Investor Relations email at [Investor.Relations@AutoZone.com](mailto:Investor.Relations@AutoZone.com)

Since AutoZone is a retail industry leader, AutoZoners are frequently invited to participate in and share their business expertise at public events. All requests to speak or present on behalf of AutoZone and any speaking points and materials must be reviewed in advance by the requesting AutoZoner's leadership, Communications and Legal to ensure messaging is consistent. This approval process begins by completing the AutoZone External Speaking Engagement form available on Daily Online Communications (DOC).

Always notify your manager about any requests for information about AutoZone. This allows AutoZone to better control what information is released to the public, while freeing up AutoZoners to focus on the needs of our customers.

Use care and follow our Social Media Policy when talking about AutoZone through social media and other networking sites, digital platforms and/or outlets. AutoZoners should never share confidential or proprietary company information online. If you identify yourself on social media as an AutoZoner, clarify that your opinions and ideas are your own and not AutoZone's. This keeps our message clear and consistent.

If you have questions, please discuss them with your manager.

To learn more about AutoZone's Social Media Policy, click [here](#).

# BUSINESS FREE FROM CORRUPTION

AutoZoners achieve exceptional results because AutoZoners act with the utmost integrity and respect for the law. **It is critical that we always act with the highest ethical standards as we continue to grow our business and earn the trust of our customers, the communities we serve, our investors and each other.**

That's why, in all aspects of our business, we avoid even the appearance of corruption or **bribery**. We do business—and win business—based on our hard work, dedication and WOW! Customer Service.

## KNOWING AND FOLLOWING ANTI-CORRUPTION LAWS

AutoZone is committed to complying with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA). We regularly train AutoZoners globally on a variety of policies including our Code, anti-corruption and anti-bribery.

AutoZoners must never bribe—or even appear to bribe—others. Neither AutoZoners nor our vendors may offer, give or authorize giving **anything of value** to anyone in order to inappropriately or unlawfully win, increase or keep their business, or otherwise gain an improper business advantage for AutoZone or gain a personal benefit.

**Remember that “anything of value” is anything of value that provides personal benefit to the recipient and may include such things as discounts on products or services that are not available to other members of the public (or to all AutoZoners), ownership in a company, and offers of employment or consulting opportunities for you or an immediate family member.**

Similarly, AutoZoners can't look the other way when third-parties or governmental officials or others offer bribes or anything of value on our behalf. This is especially true when dealing with either U.S. or non-U.S. government officials, which also include political party members and candidates for office, as well as employees or third-party representatives of government-owned entities.

You must never offer, give or receive anything of value, even something you think is nominal to a U.S. or non-U.S. government official or candidate for office without first receiving written permission from AutoZone's General Counsel. If you receive a solicitation from a government official for a gift or anything of value, you must respectfully refuse the gift and report any such request immediately to your manager.

## FACILITATION PAYMENTS

Facilitation payments to an individual government official are typically payments made, in cash, to guarantee or speed up a routine government process (such as payments to turn on utilities or to process paperwork for a license or permit). Even when permitted by law, AutoZone doesn't make such payments because they can be viewed as bribes. AutoZone may be allowed to pay a fee for rush or expedited service, but only if such fee is paid directly to a government agency and is a part of published, expedited rate. If you are asked to make a facilitation payment, please reach out to AutoZone's General Counsel or the Legal department for advice.

## THIRD-PARTIES

We have a responsibility to closely monitor any third-party agents we hire. Representatives and third-parties must never pay, offer, receive gifts, bribes or anything of value on AutoZone's behalf.

**To learn more about AutoZone's policy on Compliance with Anti-Corruption Laws, click [here](#).**

**See [page 34](#) to learn how to report concerns about Anti-Corruption (e.g., bribery, kickbacks, FCPA violations).**

### BEST PRACTICE:

Know and train your third-party agents. Make sure they understand our policies especially if your third-party agents will be working with government officials. Understand how they engage with government officials and ask about their own policies and controls. Be sure to conduct a background check and investigate the integrity of a third-party before they are hired and watch out for red flags. If you suspect a third-party working for AutoZone is receiving, offering gifts, bribes or anything of value, speak up immediately by informing your manager or by the other reporting options available on [page 9](#).



*Vendor Summit, Asia Global Sourcing Thailand*

## **GLOBAL TRADE AND ANTI-MONEY LAUNDERING LAW**

At a minimum, we comply with U.S. Customs and non-U.S. duties and tariffs as required. As needed, AutoZone obtains the appropriate trade and import/export permits or licenses. Among others, we also follow laws that combat terrorist financing.

**We comply with the economic sanctions and embargoes and limit what countries with which we conduct business.**

Economic sanctions and embargoes are an important part of global trade. We honor and comply with restrictions imposed by the U.S. and other countries that limit or completely prohibit our dealings with certain countries, businesses or individuals originating from or currently located in those countries. These limitations make it vital for us to know who we're dealing with, and AutoZone has controls in place to evaluate those with whom we are doing or plan to do business.

On the other hand, boycotts, or trade restrictions that aren't established or sanctioned or recognized by the U.S. are illegal and not something in which we participate. Requests to participate in an unsanctioned boycott can come from anyone with whom we do business with and might be tough to identify. If you are ever asked to refuse to do business with a certain country, business or people from that country, talk to your manager immediately.

We should also be aware of possible money laundering schemes and terrorist-funded or backed activities. Money laundering is a process in which individuals or entities try to conceal illicit funds or enter into transactions to make illicit funds seem legitimate.

If you have concerns or believe there is illegal activity going on or the potential for it that involves AutoZone or representatives of AutoZone, immediately talk to your manager or AutoZone's General Counsel or see [page 34](#) to report.

# PROTECTING OUR ENVIRONMENT

At AutoZone, we care about the environment and work hard to implement environmentally responsible practices in our stores, distribution centers, support centers and fleet facilities. Not only do we adhere to environmental laws and regulations wherever we operate, but we also strive to Go the Extra Mile. We actively seek out strategies to reduce our waste, energy consumption and emissions.

Moreover, we're committed recyclers, actively recycling a wide range of materials, including used batteries, oil, oil filters, scrap metal, electronic waste, paper, cardboard and wooden pallets. To further minimize waste and protect the environment, we also use industry best practices to dispose of chemical products and hazardous waste safely and responsibly.

All AutoZoners are expected to participate in our environmental protection efforts by following AutoZone's environmental policies and procedures. If you're interested in learning more about how you can contribute, please speak with your manager, or call our **Environmental Hotline at 1-800-459-8709**.



# POLITICAL CONTRIBUTIONS AND ADVOCACY

Supporting local politicians, causes and candidates for office is one of the many ways AutoZone gets involved with and demonstrates concern for our communities. But we must comply with the laws that govern our participation in the political arena.

**Only a select few AutoZoners have these kinds of responsibilities—if you are not one of them, you may not advocate on AutoZone's behalf!**

In addition to public laws that govern our participation in the political arena, we have an internal process that reviews and approves all donations to candidates. All corporate political contributions and contributions from AutoZone's Political Action Committee (PAC) are reviewed and approved in advance by the senior leader of Government Relations and the internal PAC Council. Please contact the Director of Government Relations or AutoZone's General Counsel with any questions.

Advocacy means providing information and feedback about political legislation or actions that could affect our business or customers. It is a process by which companies work to provide information and perspective on public policy or legislation that has the potential to affect our business or our customers.



# HOW TO REPORT CONCERNS

You are not required to identify yourself when you make a report and may remain anonymous. If you choose to provide your name, it will be kept confidential to the extent the law allows. AutoZone does not tolerate retaliation, harassment or any kind of discrimination against those who speak up in good faith. Speaking up in good faith means that you report your concerns honestly, timely and thoroughly.

There are several ways to report your concerns:

Via email: [General.Counsel@AutoZone.com](mailto:General.Counsel@AutoZone.com), or [FCPA.GeneralCounsel@AutoZone.com](mailto:FCPA.GeneralCounsel@AutoZone.com)

Via letter: Attn: General Counsel, AutoZone, Inc., Dept. #8074, P.O. Box 2198, Memphis, TN 38103

Complete and submit an **Incident Reporting Form** by clicking [here](#).

Note: This form can be accessed from any web browser

Via phone:

Note: Once you dial the toll-free number listed below, choose option 1 for the Code, option 2 for FCPA, option 3 for financial fraud.

Toll-Free Numbers		
Brazil - 0-800-047-5023	India - 000-800-050-4337	Türkiye - 00-800-44-882-4338
Chinese Mainland - 10-800-852-2158	Mexico - 800-062-5344	United Kingdom - 0-800-023-2073
Germany - 0-800-724-6601	Spain - <b>number coming soon</b>	U.S., Puerto Rico, U.S. Virgin Islands and Canada - 800-243-7989
France - <b>number coming soon</b>	Chinese Taiwan - 080-066-8788	



## WAIVERS

In certain circumstances, it may be appropriate to grant a waiver of a provision of the Code. Any request for a waiver must be in writing and presented to AutoZone’s General Counsel or the General Counsel’s designee. Any waiver of this Code for AutoZone’s executive officers or a member of the Board of Directors may be made only by the Board of Directors or a committee of the board and must be promptly disclosed to shareholders in accordance with legal and regulatory requirements.



*An AutoZoner Always....*

**PUTS CUSTOMERS FIRST | CARES ABOUT PEOPLE  
STRIVES FOR EXCEPTIONAL PERFORMANCE | ENERGIZES OTHERS  
EMBRACES DIVERSITY | HELPS TEAMS SUCCEED**

