



## Table of Contents

|  |                         |
|--|-------------------------|
| <b>Code of Ethics Policy</b>                   | <a href="#">Page 1</a>  |
| <b>Human Rights Policy</b>                     | <a href="#">Page 9</a>  |
| <b>Service Provider Code of Conduct Policy</b> | <a href="#">Page 11</a> |
| <b>Workforce Policy</b>                        | <a href="#">Page 15</a> |
| <b>Anti-Money Laundering Policy</b>            | <a href="#">Page 20</a> |



## Code of Ethics Policy

### 1. Introduction

At Credit Acceptance, we are dedicated to maintaining a “Culture of Compliance”. Therefore, we expect all Team Members to respect and obey applicable laws, rules, and regulations, as well as make the right decision when ethical questions arise. Although we do not expect Team Members to know the details of all laws, rules, and regulations applicable to the Company, it is important to know enough to determine when to seek advice from your supervisor, Human Resources, the Corporate Legal Department, or other appropriate personnel.

### 2. Team Member Responsibilities

Our values are spelled out simply in the PRIDE acronym. We want all team members to be Positive, Respectful, Insightful, Direct, and Earnest. What makes our values special is that they were chosen by our own Team Members. Team Members must understand and comply with the Code, Team Member Manual, company policies, and applicable laws, rules, and regulations. We have a responsibility to complete all required training and to communicate with each other and our customers about the standards we’ve put in place in order to ensure our Company remains an ethical leader in our industry.

### 3. Conflicts of Interest

Credit Acceptance recognizes and respects that Team Members have personal relationships, activities, interests, and financial needs separate from the Company. From time to time, there may be situations that could potentially affect Credit Acceptance. This policy is written to promote an understanding of potential areas where personal and work situations could conflict and describes the process to manage these situations.

There are four main areas of potential conflict:

- Managing personal relationships at work.
- Engaging in outside activities.
- Receiving and giving gifts (monetary or other).
- Managing relationships with others (vendors, dealers, consumers, businesses, or government agencies, or any outside entity that could affect Credit Acceptance business).

In general, Team Members must avoid conflicts of interests described in this policy, or even the appearance of such conflicts. Team Members must not misuse Credit Acceptance's resources or act as a Company representative in a way that negatively influences or discredits Credit Acceptance's good name and reputation. You should exercise sound judgment before committing to any activity or participating in any transaction that could potentially be a conflict of interest. The effectiveness of this policy depends in large part on the cooperation of all team members in disclosing any situations that may be contrary to the intent of the policy and the ethical standards that it conveys.

If a Team Member becomes aware of a conflict or potential conflict of interest where their interests may conflict with the Company's interests, or is concerned that a conflict might develop, they should bring it to the attention of the Corporate Legal department by submitting an inquiry via Ask a Lawyer before engaging in that activity or accepting something of value.

#### **4. Corporate Opportunity**

Except as otherwise set forth in the Company's certificate of incorporation and bylaws, Team Members owe a duty to the Company to advance the Company's business interests when the opportunity to do so arises. Team Members are prohibited from taking, or directing to a third party to take, a business opportunity that is discovered through the use of corporate property, information, or position, unless the Company has already been offered the opportunity and turned it down. Additionally, Team Members may not use corporate property, information, or position for personal gain. Sometimes the line between personal and Company benefits is difficult to draw, and sometimes there are both personal and Company benefits in certain activities. Team Members should discuss with their manager and submit any questions through an Ask a Lawyer to Corporate Legal or request to Human Resources through the Request Portal.

#### **5. Protection of Assets, Confidentiality and Communications**

All Team Members sign a confidentiality agreement that deals primarily with their access to Credit Acceptance's Confidential Information. The agreement provides that Team Members will not disclose or use any Credit Acceptance Confidential Information, either during or after their employment at Credit Acceptance.

Employment with Credit Acceptance assumes an obligation of maintaining confidentiality, even after a Team Member leaves our employment. Our customers entrust Credit Acceptance with important information relating to their accounts. The nature of this relationship requires maintenance of confidentiality. In safeguarding the information received, Credit Acceptance earns the respect and further trust of our customers.

No one is permitted to remove from Company premises, download, e-mail (outside of the Company or to a personal email address), or make copies of any Credit Acceptance internal business-related records, reports, documents, or other Confidential Information without prior management approval. Disclosure of such Confidential Information could lead to termination of employment as well as other possible legal action.

## **6. Fair Dealing**

Credit Acceptance's policy is to select business relationships impartially on the basis of price, quality, service, and strategic advantage to the Company. Team members must avoid doing anything that could imply selection on any basis other than the best interest of Credit Acceptance or that could give any vendor, dealer, or customer an improper advantage over another including disclosing confidential Credit Acceptance information or knowledge about the others competing for our business. Team Members should not refer business to one vendor over another based on family members who may be employed at or have any interest or investment in a particular vendor. Team Members are asked to include their immediate supervisor in the decision-making process if they feel they are unable to be impartial because of a personal relationship with the vendor.

No team member or immediate family member should have any interest or investment in any supplier, customer, or competitor of Credit Acceptance that creates favoritism, bias or that would violate a contractual agreement on behalf of Credit Acceptance and its team members. Team Members are prohibited from acting on behalf of Credit Acceptance in any transaction involving persons or organizations with which Team Member, or their immediate family member, has any financial or personal interest

## **7. Compliance with Laws, Rules and Regulations**

All Team Members must respect and obey all laws when carrying out responsibilities on behalf of the Company and refrain from illegal conduct. Team Members have an obligation to be knowledgeable about specific laws, rules and regulations that apply to their areas of responsibility. If a law conflicts with a policy in this Code, Team Members must comply with the law. Any questions as to the applicability of any law should be directed to the Corporate Legal Department.

All Team Members are required to take our Annual Compliance Training that provides an overview of state and federal lending and consumer protection laws impacting the Company, including the Fair Debt Collection Practices Act, Truth In Lending Act, Equal Credit Opportunity Act, and other applicable regulatory requirements. Failure to successfully complete the Company's Annual Compliance Training on a timely basis results in restriction of access privileges and other disciplinary action, including potential termination.

The Company strives to maintain a work environment in which all individuals are treated with respect and dignity. Every individual has the right to work in a professional atmosphere that promotes equal employment opportunities and where discriminatory practices, including harassment, are prohibited. All Team Members are required to take an annual training program regarding anti-discrimination, harassment, and work place safety. Please review our Team Member Manual and related policies that outline our standards and expectations for Team Members.

The Company works to conduct its business activities and operations in a manner that promotes protection of people and the environment to the extent practicable. Team Members are responsible for complying with all applicable laws, rules and regulations governing health, safety, and the environment.

## **8. Keeping the Audit Committee Informed**

The Audit Committee plays an important role in ensuring the integrity of the Company's public reports. If a Team Member believes that questionable accounting or auditing conduct or practices have occurred or are occurring, they should notify the Audit Committee of the Board. In particular, any Team Member should promptly bring to the attention of the Audit Committee any information of which they may become aware concerning:

- a. The accuracy of material disclosures made by the Company in its public filings,
- b. Material weaknesses or significant deficiencies in internal control over financial reporting,
- c. Any evidence of fraud that involves a Team Member who has a significant role in the Company's financial reporting, disclosures or internal controls or procedures, or
- d. Any evidence of a material violation of the policies in this Code regarding financial reporting.

## **9. Maintaining and Managing Records**

The Company is required by local, state, federal, foreign, and other applicable laws, rules, and regulations to retain certain records and to follow specific guidelines in managing its records. Records include all recorded information, regardless of medium or characteristics.

Civil and criminal penalties for failure to comply with such guidelines can be severe for Team Members, vendors, service providers, contractors, and the Company. Additionally, please note that all Company-issued devices, computers, hardware, cell phones, media, documents, records, and information are the property of the Company. As such, the Company requires Team Members to cooperate with any request made by the Compliance Department and/or Corporate Legal Department to preserve or produce any documents, records, information, devices, computers, hardware, cell phones or other media. Team Members should consult with the Corporate Legal and/or Compliance Department regarding the retention of records in the case of an actual or threatened litigation or government investigation. The Corporate Legal Department will notify Team Members if a legal hold is placed on records for which Team Members are responsible. A legal hold suspends all document destruction procedures in order to preserve appropriate records under special circumstances, such as litigation or government investigations. The Corporate Legal Department determines and identifies what types of records or documents are required to be placed under a legal hold. If a legal hold is placed on records for which Team Members are responsible, they must preserve and protect the necessary records in accordance with instructions from the Corporate Legal Department. Records or supporting documents that are subject to a legal hold must not be destroyed, altered, or modified under any circumstance. A legal hold remains effective until it is officially released in writing by the Corporate Legal Department. If a Team Member is unsure whether a document has been placed under a legal hold, they should preserve and protect that document while they check with the Corporate Legal Department.

## **10. Political Activities**

The Company does not make contributions to political candidates or political parties except as permitted by applicable laws. Team Members engaging in political activity will do so as private citizens and not as representatives of the Company. An employee's personal lawful political contribution, or decision not to make a contribution, will not influence the employee's compensation, job security or opportunities for advancement.

## **11. Receiving and Giving Gifts**

Credit Acceptance realizes that from time-to-time vendors, dealers, or other business affiliates will recognize a team member's efforts or create an opportunity to network with colleagues through means such as gifts, awards, or tickets to or participation in non-Credit Acceptance sponsored events. Credit Acceptance believes that it is a direct conflict of interest to solicit gifts, to consider the receipt of gifts as a factor in cultivating, influencing, or maintaining a business relationship, or to accept lavish gifts. Lavish gifts are defined as gifts with a value over \$250.

The following are guidelines to use when determining an appropriate response to receiving a gift:

- You may accompany a vendor to an event (sporting event, theater, dinner) when the vendor is present and the purpose is to build a stronger business relationship regardless of the cost of the event.
- Gifts of money, in any amount, may not be accepted (Amex Gift Check, money order, or check).
- When possible, utilize the gift for the benefit of Credit Acceptance including using it as an incentive award (i.e., award to the best performer), reduce costs for the company (i.e., use airline ticket for business trip), or broadly make available (share a gift basket in the lunch room or randomly distribute).
- Under no circumstance, however, may you receive gifts or anything of value from current or prospective customers or suppliers if there are dishonest or unethical intentions.
- Receiving gifts from the same vendor is not permitted.
- Receiving discounts or avoiding charges should also be considered the receipt of gifts and are subject to this policy.
- While it is appropriate for a spouse to accompany a team member to a vendor event, a spouse should not receive any other gift.
- You should discuss the offer of receiving a gift with your immediate supervisor if you believe that declining the gift would damage the relationship with the vendor, dealer, or other affiliate.
- You must not accept a gift that would discredit Credit Acceptance's good name and reputation.

Team Members should dedicate the same careful consideration and thought for the appropriateness of gifts to customers, Dealers, and vendors of Credit Acceptance as they would apply to any gifts a Team Member might receive.

On an annual basis, Team Members receive training on the Company's compliance expectations and to report any suspected violations of Company policy by team members, dealers, or service providers. As part of our annual training, Team Members are trained in the multiple ways they can escalate potential compliance issues to leadership.

## 12. Compliance, Reporting and Investigations

All organizations are exposed to the risk of fraud and other wrongdoing. Credit Acceptance takes this risk seriously and has implemented procedures to detect suspected wrongdoing and to respond with the appropriate corrective measures. The process of detecting wrongdoing involves team members, dealers and others who come in contact with our organization. You are encouraged to report any wrongdoings involving the Company including:

- Suspected fraud.
- Intentional manipulation of financial statements.
- Misappropriation (stealing or embezzling) of Company assets by current team members, former team members, dealers, customers, or vendors.
- Corruption including bribery or receipt of bribes.
- Suspected violation of laws or regulations by team members, dealers, customers, or vendors.
- Suspected violation of Company policy including harassment, discrimination, conflict of interest, or other conduct-related issues.
- Workplace safety concerns.

An anonymous ethics hotline is available for you to submit concerns without a fear of dismissal or retaliation. The hotline is answered by an independent third party, Lighthouse Services, which routes the concerns for resolution based on guidelines established by the Company's independent Audit Committee. You can contact the hotline by phone or online:

Phone: (855) 900-0046

Online: <http://www.lighthouse-services.com/creditacceptance>

All reports will be kept confidential, to the extent practical, except where disclosure is required to investigate a report or mandated by law. The Company does not permit retaliation of any kind for good faith reports of violations or possible violations.

Reported violations will be promptly and thoroughly investigated. As a general matter, the Board will oversee investigations of potential violations by directors or executive officers, and the Compliance Department will oversee investigations of potential violations by other Team Members. However, it is imperative that the person reporting the violation not conduct an investigation on their own. Team Members are expected to cooperate fully with any appropriately authorized investigation, whether internal or external, into reported violations. Team Members should never withhold, tamper with, or fail to communicate relevant information in connection with an appropriately authorized investigation. In addition, Team Members are expected to maintain and safeguard the confidentiality of an investigation to the extent possible, except as otherwise provided below or by applicable law. Making false statements to or otherwise misleading internal or external auditors, investigators, legal counsel, Company representatives, regulators or other governmental entities may be grounds for immediate termination of employment or other relationship with the Company and also be a criminal act that can result in severe penalties.

### **13. Reporting and Records**

As a financial services company, it is of critical importance that the Company's reporting to the various regulators with oversight over our business, and to our partners, be full, fair, accurate, timely and understandable. Depending on their respective positions with the Company, Team Members may be called upon to provide information necessary to assure that the Company's reporting meet these requirements. The Company expects Team Members to take this responsibility very seriously and to provide prompt and accurate answers to inquiries related to the Company's reporting requirements. Team Members are responsible for the accurate and complete reporting of financial information within their respective areas and for the timely notification to senior management of financial and non- financial information that may be material to the Company to ensure full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with government agencies or releases to the general public.

Each Team Member involved in the Company's disclosure process must familiarize themselves with the disclosure requirements applicable to the Company and the business and financial operations of the Company, and must not knowingly misrepresent, or cause others to misrepresent, facts about the Company to others, whether within or outside the Company, including to the Company's independent auditors, governmental regulators, and self-regulatory organizations.

Team Members must maintain all of the Company's books, records, accounts, and financial statements in reasonable detail, and reflect the matters to which they relate accurately, fairly, and completely. Furthermore, Team Members must ensure that all books, records, accounts, and financial statements conform both to applicable legal requirements and to the Company's accounting policies and system of internal controls. Team Members must carefully and properly account for all assets of the Company. Team Members may not establish any undisclosed or unrecorded account or fund for any purpose. Team Members shall not make any false or misleading entries in the Company's books or records for any reason, or disburse any corporate funds or other corporate property without adequate supporting documentation and authorization. Team Members shall not misclassify transactions related to accounts, business units or accounting periods. Each Team Member bears responsibility for ensuring that they are not party to a false or misleading accounting entry.

### **14. Discipline**

Team Members who violate this Code may be subject to disciplinary action, up to and including termination of employment. Moreover, Team Members who direct or approve of any conduct in violation of this Code, or who have knowledge of such conduct but do not immediately report it, may also be subject to disciplinary action, up to and including termination of employment.

Furthermore, violations of some provisions of this Code are illegal and may subject Team Members to civil and criminal liability.



## **15. Disclosure**

Nothing in this Code limits or prohibits Team Members from engaging for a lawful purpose in any Protected Activity. “Protected Activity” means filing a charge or complaint, or otherwise communicating, cooperating, or participating, with any state, federal or other governmental agency, including the Securities and Exchange Commission, the Equal Employment Opportunity Commission, and the National Labor Relations Board. Notwithstanding any other policies in this Code (or elsewhere), Team Members are not required to obtain authorization from the Company prior to disclosing information to, or communicating with, such agencies, nor are Team Members obligated to advise the Company as to any such disclosures or communications. Notwithstanding, in making any such disclosures or communications, Team Members must take all reasonable precautions to prevent any unauthorized use or disclosure of any information that may constitute Company confidential information to any parties other than the relevant government agencies. Protected Activity does not include the disclosure of any Company attorney-client privileged communications; any such disclosure violates Company policy unless it is made with the written consent of the Chief Legal Officer or authorized Company legal counsel, Chief Executive Officer, or Board of Directors.

## **16. No Retaliation**

No one may terminate, demote, suspend, threaten, harass or in any other manner discriminate against a team member in terms and conditions of employment because of any lawful act done by the team member for providing information, causing information to be provided, or otherwise assisting in a legal investigation regarding any conduct that the team member reasonably believes constitutes a violation of Company policy.

Nothing in this Code prohibits Team Members from reporting possible violations of federal law or regulation to any governmental agency or entity; or making other disclosures that are protected by federal law or regulation.

## **17. Amendment, Modification and Waiver**

The Company reserves the right to amend this Code at any time, for any reason, subject to applicable laws, rules, and regulations. Any amendment, modification, or waiver of the provisions of this Code must be approved in writing by the Board or, if appropriate, its delegate(s) and promptly disclosed pursuant to applicable laws and regulations. Any waiver or modification of this Code for the principal executive officer, principal financial officer, principal accounting officer, controller, or any other persons performing similar functions in the Company will be promptly disclosed to stockholders if and as required by applicable law or the rules of the stock exchange on which the securities of the Company are listed.

## **18. Acknowledgment**

All Team Members must annually acknowledge that they have read this Code and that they understand and agree to comply with its provisions. Acknowledgment forms will be kept in employee personnel files. Failure to read this Code or to complete an acknowledgment form does not excuse any person from the terms of this Code.



## Human Rights Policy

Credit Acceptance is committed to operating lawfully, ethically, and in a manner that advances responsible social governance and the protection of Human Rights. Credit Acceptance strives to respect and safeguard Human Rights in our relationships with team members, dealerships, consumers, vendors, suppliers, and the communities in which we operate in a manner consistent with the [United Nations Universal Declaration of Human Rights](#) and the [United Nations Guiding Principles on Business and Human Rights](#). While it is the role of government in each country to protect Human Rights through adequate laws and policies, Credit Acceptance understands that, as a good corporate citizen, it must play an active and constructive role by identifying the Company's own impact on Human Rights. That role includes taking intentional steps to protect and promote Human Rights and to prevent Human Rights violations to the extent they could arise in connection with the Company's operations regardless of geographic location. Given the nature of its business and operations largely confined within the United States, Credit Acceptance believes it operates with an innately low risk of modern slavery, human trafficking, and similar Human Rights violations. Nonetheless, Credit Acceptance recognizes that salient risks to Human Rights can arise in connection with the automobile financing and contract servicing industry and, consequently, actively seeks to prevent adverse Human Rights impacts from its operations both internally and externally.

As part of its dedication to Human Rights, Credit Acceptance is committed to protecting minority groups' rights and women's rights, valuing diversity, equity, and inclusion, and providing opportunities for vulnerable and underprivileged members of society, including credit-challenged consumers. Credit Acceptance does not tolerate unlawful discrimination or harassment of any kind, including sexual harassment. Credit Acceptance considers discrimination on the basis of age, sex, color, race, creed, national origin, religion, disability, veteran status, pregnancy, sexual orientation, gender identity or expression, or any other legally protected status to be a major offense which may result in disciplinary action against the offender, regardless of the offender's position or affiliation with the Company. In furtherance of this policy, Credit Acceptance requires training designed to help prevent discrimination and harassment in the workplace. Credit Acceptance also believes in, and has processes in place to achieve, equal pay for equal work. Credit Acceptance provides additional details about its approach to equal employment opportunities, Diversity and Inclusion, and related legal compliance in the Company's [Workforce Policy](#), and it also provides direction internally through its Team Member Manual and various communications shared on the Company's intranet and through email.

Credit Acceptance is also intent on helping the Company's enrolled dealerships, consumers, service providers, vendors, and suppliers prevent Human Rights violations. Through its regular due diligence and periodic audits, Credit Acceptance strives to maintain relationships with other businesses that respect Human Rights and a supply chain free from any Human Rights violations, including modern slavery and human trafficking.

Each member of Credit Acceptance's Senior Leadership Team is responsible for overseeing and implementing this policy, which includes, among other things, an obligation to identify and address any salient risks to Human Rights within that leader's area of oversight. All identified risks must be reported to the Compliance Department as soon as reasonably practical to ensure that all risks are promptly addressed. It is the responsibility of every team member (which includes all employees, contractors, and management) and Board Member to not only be aware of this policy, but also to comply with it and to raise any concerns with adverse Human Rights impacts through the appropriate channels – regardless of whether those concerns arise directly from Company operations or indirectly as a result of the Company's relationship with a third-party.

Credit Acceptance will implement training or send communications from time to time that are designed to convey the key principles and aspects of this policy to team members and other stakeholders.

### **Reporting Human Rights Concerns, Suggestions, and Questions**

The Company is open to input on this policy from all stakeholders, whether internal or external.

Concerns about adverse Human Rights impacts, suggestions for enhancements to this policy, or questions about this policy, may be submitted by any stakeholder through Credit Acceptance's various listening channels, including but not limited to: by submitting an anonymous report through [Lighthouse](#) (internal or external), by submitting concerns through the Company's [Ask A Lawyer](#) or [HR Request](#) portals (internal), or by submitting a [Red Tape Remover](#) directly to the Senior Leadership Team, including the Chief Executive Officer (internal). Internal or External concerns or suggestions for enhancements to this policy may also be reported by email through a link located on Credit Acceptance's [ESG webpage \(ESG@creditacceptance.com\)](#).

All suggestions and concerns will be reviewed and, to the extent necessary, investigated by or in coordination with the Company's Compliance Department. If adverse Human Rights impacts are substantiated in connection with the Company's operations or relationships with third parties, the Company will take steps to address and remediate such impacts to the extent of its leverage in addressing the adverse impact, including by ending business relationships when dealing with third parties who do not share Credit Acceptance's value of upholding Human Rights.

This Policy has been approved by the Company's Board of Directors and will be reviewed on an annual basis.



## Service Provider Code of Conduct Policy

### Overview

The Service Provider Code of Business Conduct and Ethics (“Service Provider Code”) documents key principles governing interactions between Credit Acceptance team members and our service providers and customers and further sets out business conduct expectations of our service providers. We recognize that many of our service providers have their own codes of conduct or business ethics standards, and they are expected to follow the most restrictive applicable requirements.

Each service provider must review the contents of this document with their associates who are assigned to or otherwise engaged with Credit Acceptance on a regular or periodic basis.

Agreement to these requirements by a service provider does not constitute a commitment to any level of business with Credit Acceptance. The Service Provider Code does not constitute an employment contract or create an employment relationship between service provider employees and Credit Acceptance.

### Expectations

Credit Acceptance is committed to conducting its business activities in an ethical and responsible manner and requires that all service providers commit to the same standards in their daily activities. Credit Acceptance requires service providers to understand and adhere to these requirements and be able to demonstrate how these requirements are being met upon request. Service providers are encouraged to contact Credit Acceptance should they have any questions on this Service Provider Code. Credit Acceptance reserves the right to amend the Service Provider Code in line with best practice and will communicate any material changes to service providers as they occur.

- 1. Comply fully with laws and regulations.** All service providers and their employees, agents, representatives, and subcontractors must comply with applicable laws and regulations, including but not limited to anti-money laundering, anti-terrorist financing, anti-corruption, and antitrust and competition laws. They are expected to honor applicable industry standards, international treaties, and internationally accepted standards and agreements relevant to their activities.
- 2. Service provider systems and controls.** Service providers are expected to understand the business conduct, social, and environmental issues related to their activities. They are expected to establish and maintain governance and control systems appropriate to the nature and scale of their activities and have systems for managing their own agents and vendors.
- 3. Accurate records.** Service providers must maintain adequate and accurate internal records, including financial records, related to the service provider’s contract with Credit Acceptance.

Falsification of records is prohibited. Records should be retained and disposed of in accordance with all applicable laws and regulations.

- 4. Business continuity and disaster recovery.** Credit Acceptance expects its service providers to manage business continuity risks and assure the availability of their services during an unexpected event. Service providers should have recovery plans in place for their business and key contractors to continue with minimal interruption should there be an emergency.
- 5. Business conduct.** Service providers will conduct their business with Credit Acceptance in a responsible manner and abide by minimum standards and business integrity.
  - a. Bribery and Corruption:** Credit Acceptance does not tolerate corruption or bribery in any form and we expect our service providers to comply with requirements of all anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. Service providers are strictly forbidden from offering any bribe (consisting of money or anything of value) to public officials, irrespective of their worth, its results, local custom, the tolerance of such payments by local authorities, or the alleged necessity of the payment in order to obtain or retain business or any other advantage. Service providers are forbidden from seeking to obtain new business or any other improper commercial advantage by allowing undue payments to be made.
  - b. Competition:** Service providers shall refrain from directly or indirectly engaging in any discussion or activity that constitutes anti-competitive behavior or in any other way violates anti-trust laws.
  - c. Conflicts of Interest:** Service providers should avoid any actual or apparent conflict of interest. Service providers are required to communicate potential conflicts of interest to Credit Acceptance.
  - d. Fair Payment:** Service providers are expected to acquire products and services in accordance with sound business practice, for legitimate commercial reasons, and will provide appropriate remuneration and payment terms for goods and services.
  - e. Fair Representation:** Service providers are expected to fairly represent the benefits of their goods, products and services in ways that are fair, clear, and meet with customers evolving long-term needs. They should not take unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice
  - f. Health and Safety:** Service providers are expected to comply with all health and safety laws and regulations to ensure that all work is performed in a safe and responsible manner.
  - g. Workplace Violence:** Service providers are expected to maintain a safe, secure work environment and will not tolerate any acts or threats of workplace violence.
- 6. Environment.** Service providers should recognize and manage their environmental impact. Service providers are strongly encouraged to minimize or eliminate negative environmental impact through their own actions.
- 7. Social.** Service providers are expected to recognize, avoid, or minimize any adverse impacts and risks of their activities on social well-being.

- a. *Involuntary Labor and Human Trafficking*: Service providers should not use forced or compulsory labor practices and must take steps to ensure they do not contribute to the use of forced or compulsory labor, in compliance with the core standards of the International Labor Organization (ILO).
- b. *Child Labor*: Service providers should not use child labor and must take steps to ensure they do not contribute to the use of child labor, in compliance with the core standards of the ILO.
- c. *Fair Wages*: Service providers should provide the wages, benefits, and conditions of work that represent just and fair remuneration with transparent payment terms within the framework of government policies and in compliance with the standards of the ILO. Service providers are expected to provide all workers with written and understandable information about their terms and conditions of employment, including compensation which should be in a globally known currency.
- d. *Working Hours*: Service providers are expected to ensure that working hours comply with national legislation and applicable international guidelines.
- e. *Human Rights*: Service providers should uphold internationally recognized human rights and are expected to avoid complicity in the abuse or violation of internationally proclaimed human rights standards.
- f. *Fair Treatment*: Service providers will treat employees with dignity and respect. Physical abuse, the threat of physical abuse, sexual or other harassment, verbal abuse or any other form of intimidation are prohibited. Service providers will not retaliate against employees who report abuse, discrimination, ethical concerns, or violations of law.
- g. *Non-Discrimination*: Service providers should refrain from any discriminatory practices either regarding recruitment, promotion, compensation, or benefits, or in their general conduct in the workplace. Company policies, procedures and practices should be applied fairly, should avoid negative impact on any specific group of employees or potential employees and should promote diversity, equity, and inclusion, whether on the grounds of race, disability, religious belief, military status, sexual orientation, age, gender, or gender identity.
- h. *Safe and Healthy Work Environments*: Service providers are expected to provide a safe, hygienic, and healthy workplace for employees and contractors, and provide adequate training to workers on these matters.
- i. *Freedom of Association and Collective Bargaining*: Service providers should respect the rights of employees to associate freely, to join or not join labor unions and works councils and seek representation in accordance with local laws.
- j. *Grievance Procedures*: Service providers are expected to enable employees to communicate openly with management regarding working conditions without fear of reprisals, intimidation, or harassment. Service providers should also have grievance mechanisms in place to allow complaints from other stakeholders to be heard, assessed, and – if necessary – remedied as expeditiously as possible.

- k. *Contract Workers*: Service providers are expected to ascertain any contract workers to determine they are reputable and legitimate before engaging them in connection with work performed for Credit Acceptance. Service providers are expected to regularly monitor the performance of these contract workers against the standards of conduct outlined in this policy.
- l. *Service Provider Audits*: Prior to engaging any service provider, and at a cadence consistent with our internal policies, the Company audits service providers on licensing, insurance, employment-related discrimination and harassment complaints, consumer litigation, security risks, data protection, and overall compliance with state and federal laws. These audits include on-site, virtual, and remote visits to ensure compliance with the Company's standards and expectations, including those within this Code.
- m. *Data Security, Confidentiality, and Insider Information*: Service providers must maintain the confidentiality of all non-public information, regarding Credit Acceptance or its activities, and all non-public information obtained in the performance of the service provider's duties, including information related to Credit Acceptance customers, employees, vendors or third parties. Service providers will handle and process Credit Acceptance's confidential information only for the purposes for which it was collected or otherwise made available. Service providers shall demonstrate appropriate industry standards and best practices for data security controls – including appropriate technical and organizational measures. Service providers will immediately notify Credit Acceptance of any known or suspected data security breaches and will work with Credit Acceptance to investigate, mitigate, and remedy such breaches.
- n. *Diversity*: Credit Acceptance recognizes the value in and promotes the growth of diverse-owned business in our communities. We are committed to ensuring that diverse businesses — minority-, woman-, veteran, disability-, and LGBTQ-owned — have access to compete for our services throughout the Credit Acceptance enterprise to enable Credit Acceptance to deliver exceptional value to the corporation's shareholders, employees, customers, and community at large.



## **Workforce Policy**

Credit Acceptance is grateful for its team of hard-working people who are committed to Changing Lives and working together to make Credit Acceptance a Great Place to Work. At Credit Acceptance we refer to employees at all levels of the organization as “team members.” Additional information about Workforce-related policies can be found in our Team Member Manual and on our Company intranet, under categories such as HR, Career Development, and GPTW (“Great Place to Work”).

### **COMPANY VALUES – PRIDE**

In order to create the best possible working environment, Credit Acceptance expects all team members to be Positive, Respectful, Insightful, Direct, and Earnest. These values were chosen based on feedback from the Company’s own team members about the qualities they admired in people they worked with. These values are described in more detail on the Company’s intranet and through team member training modules, and are considered in hiring decisions, promotions, and performance discussions.

### **OPEN COMMUNICATION**

Credit Acceptance has an open-door policy when it comes to communication. We encourage team members to discuss any issue or concern they may have with their leader, any member of management, or an HR representative.

Team members can also escalate issues through one of the following reporting options, some of which provide for anonymous reporting:

- Red Tape Remover directly to the CEO
- Confidential Report via Lighthouse
- Request Portal (including a portal for HR Requests and an Ask A Lawyer portal for requests to Corporate Legal and Compliance)

Team members can access these listening posts on the Company intranet.

### **TEAM MEMBER FEEDBACK**

Credit Acceptance values team member feedback and is committed to acting on feedback. If Credit Acceptance determines not to act on feedback, it is committed to explaining why, so that Company decisions are as transparent as possible. In the event more information is needed to determine whether to act on feedback, the Company will communicate what additional information is needed.



Feedback is gathered through numerous listening channels. The Company will survey all team members each quarter and encourage participation in town hall meetings and round tables. As described under Open Communication, the Company makes several request portals available for team members to submit feedback and ideas.

## **DIVERSITY AND INCLUSION**

Credit Acceptance is an equal opportunity employer and intends to provide a work environment that is pleasant, professional, and free from intimidation, hostility, or other offenses which may interfere with work performance. Credit Acceptance will not tolerate unlawful discrimination or harassment, including sexual harassment, by any of its team members, officers, directors, vendors, contractors, or others doing business with Credit Acceptance. Credit Acceptance considers discrimination on the basis of age, sex, color, race, creed, national origin, religious persuasion, disability, veteran status, pregnancy, sexual orientation, gender identity or expression, or any other protected status as defined by law to be a major offense which may result in disciplinary action up to and including termination against the offender, regardless of the offender's position with Credit Acceptance. Furthermore, Credit Acceptance will not tolerate discrimination by dealerships, suppliers, or vendors.

The Credit Acceptance Team Member Manual provides further details so team members know how they can take steps to prevent discrimination and harassment in the workplace, including options for reporting discrimination and harassment anonymously. Retaliation is prohibited against any person who makes a complaint, speaks out, participates in an investigation, or takes other good faith steps intended to prevent discrimination, harassment, or retaliation in the workplace. Team members are also required to take training designed to help prevent discrimination and harassment in the workplace.

Credit Acceptance is dedicated to providing an inclusive environment for all and values a culturally diverse workforce. The Company believes in ensuring all team members demonstrate mutual respect for one another. Employment decisions are based on merit and business needs, and not any federal or state protected status as defined by law.

Our work environment is built on the values of PRIDE. By staying true to these values, we support a healthy work environment that promotes the prevention of discrimination and harassment against our team members. These efforts also result in an environment where anyone from any background can be themselves, bring new ideas and do their best work.

To help support this great work environment and focus on a commitment to diversity and awareness, we have formed a Diversity and Inclusion Committee made up of team members from diverse backgrounds and representative of departments and positions from across the Company. The mission of this committee is to maintain and enhance the environment of inclusion, a sense of belonging, acceptance of others, and safety to be your true authentic self for all team members. We encourage open discussions and diverse ways we can utilize our platform and resources to help support equality and create positive changes that align with the Company's core values.

## **SAFE WORK ENVIRONMENT**

Credit Acceptance is committed to providing a safe and healthy working environment for all team members and recognizes the importance of complying with state and federal regulations governing workplace health and safety, including without limitation the Occupational Safety and Health Act of 1970 and all corresponding regulations issued by the Occupational Safety and Health Administration. As such, Credit Acceptance has implemented this policy and others to take reasonable measures to develop safe practices consistent with applicable law and the needs of the business.

Credit Acceptance's Board Members, Senior Leadership Team, and all team members are responsible for complying with this policy, as well as all state and federal health and safety laws. Similarly, all such individuals are responsible for identifying and reporting potential hazards to the health and safety of Credit Acceptance's workplace and, to the extent possible, mitigating or eliminating those hazards. Team members who identify potential hazards or have suggestions or concerns regarding health and safety should communicate those items with Human Resources.

Any team member who observes a workplace accident or injury or who becomes aware of an unsafe condition or potential hazard must report it to his or her leader and Human Resources immediately. Team members should not hesitate to contact outside emergency response agencies when necessary. For any incident, accident, or concern related to safety, health, and security, the team member must complete a report for each such incident, accident, or concern that involves the team member or that the team member witnesses. Failure to report any such incident may result in employee disciplinary action, including termination. Failure to follow Credit Acceptance's health and safety procedures or engaging in conduct that places any individual or property at risk may lead to employee disciplinary action or termination.

Credit Acceptance does not tolerate workplace violence or aggression, whether from a team member or third party, and will take reasonable measures to ensure the health, safety, and security of the Company's personnel, facilities, and other interests. Workplace violence includes, but is not limited to threats or acts of physical violence against team members, their families, or other third parties; acts that create a hostile, abusive, or intimidating work environment; hitting or shoving; intentional destruction of property; making harassing or threatening calls or other communication; stalking; unauthorized weapons on Company property or while engaging in Company business. All team members who witness or become aware of such acts are required to notify Human Resources and, if necessary, law enforcement or other emergency response agencies.

Although this policy applies consistently throughout each department, it is the responsibility of each team member to identify and familiarize themselves with any additional policy or plan for their particular working areas. Credit Acceptance posts an emergency plan online and in conspicuous areas of the Company's facilities detailing procedures in dealing with various types of emergencies, such as fire, weather emergencies, medical emergencies, and workplace violence. Each team member should review these plans and other health and safety guidelines.

Human Resources is responsible for developing and implementing the Company's health and safety measures in the interest of a safer work environment. All stakeholders in the Company are responsible for identifying health and safety risks and working with Human Resources to implement policies to mitigate or eradicate those risks. In addition to regularly auditing its health and safety processes, Credit Acceptance will utilize its various internal and external listening channels, including but not limited to: by submitting an anonymous report through [Lighthouse](#) (internal or external), by submitting concerns through the Company's [Ask A Lawyer](#) or [HR Request](#) portals (internal), or by submitting a [Red Tape Remover](#) directly to the Senior Leadership Team, including the Chief Executive Officer (internal). Internal or External concerns or suggestions for enhancements to this policy may also be reported by email through a link located on Credit Acceptance's [ESG webpage](#) ([ESG@creditacceptance.com](mailto:ESG@creditacceptance.com)).

## **COMPENSATION TRANSPARENCY**

Credit Acceptance has created a compensation and benefits program designed to attract and retain our valued team members. Credit Acceptance intends to pay all team members wages and salaries that are competitive with other employers in the marketplace and believes that fair pay is essential to building a great culture. Compensation may vary with individual and Company performance and in compliance with all applicable statutory requirements.

Several factors may influence a team member's rate of pay such as a team member's job performance, the nature and scope of the job, what other employers pay their team members for comparable jobs (external equity), what Credit Acceptance pays its team members in comparable positions (internal equity), and the Company's financial performance. The Company conducts annual pay assessments to ensure pay remains competitive in the marketplace. The Company believes in paying for performance and conducts individual merit assessments for team members to determine appropriate wage increases and incentive compensation. Team members are informed of the range of available pay for their position, and details of incentive compensation programs are communicated to team members and published on the Company's intranet. Team members are also eligible for Service Awards based on the amount of time with the Company, a Holiday Bonus, and Quarterly Profit Sharing. Full details about Credit Acceptance's Compensation Program and Philosophy are available to team members on the Company's intranet or by contacting the Compensation Team.

## **BENEFITS**

Credit Acceptance provides eligible team members with a comprehensive benefit plan that allows team members flexibility to choose options that best fit their needs and is designed to provide for the health and welfare of team members and to enhance Credit Acceptance as a Great Place to Work. Benefits for eligible team members include, among other things, medical, dental, vision, HSA and FSA, 401(k) Plan with immediate Company matching, Life and Disability coverage, Adoption and Surrogacy assistance, Parental Time Off, a Military Pay Program, and generous paid time off. All team members have access to an Employee Assistance Program that provides support ranging from crisis counseling to financial planning, and team members also have access to a health and wellness mobile app with programs designed to help reduce anxiety and stress, and a physical fitness reimbursement program to help team members pay for physical fitness memberships and related expenses. Eligible team members can also take advantage of Credit Acceptance's Education Assistance Program, which provides financial assistance to team members pursuing a degree or professional certification intended to help advance their career with Credit Acceptance. Full details about Credit Acceptance benefits are available to team members on the Company's intranet or by contacting the Benefits Team.

## **TRAINING AND EDUCATION**

Credit Acceptance strives to provide clear expectations to all team members so it is easy to understand the requirements of each position within the Company. Each team member is provided with a position profile that sets forth the requirements and expectations of the role, and formal training is provided. Leaders are expected to engage in consistent dialogue with team members, so they know how they are performing in relation to expectations, and formal performance reviews are completed with involvement from HR at least two times per year. As part of the Company's commitment to providing a Great Place to Work, numerous resources are provided to team members to help them take the next steps in the development of their career, and to provide Leaders with the training necessary to excel in their roles. The Training and Development Department provides trainer led training, and guides leader led training, and training modules and resources are made available to team members. The Company provides team members with access to thousands of training modules on a wide variety of topics, such as leadership, career development, skill building, diversity and inclusion, or simply to pursue a hobby.

## **GREAT PLACE TO WORK**

Various team member committees play an active role in making Credit Acceptance a Great Place to Work. The Community Service Committee recruits and supports team members who act as "Champions" by organizing monthly fundraisers, drives, and more to support various charitable causes, with a Company fundraising match where applicable. The Health and Wellness Committee is responsible for organizing monthly events and initiatives that encourage Credit Acceptance team members to live healthy lifestyles in various capacities, including physical fitness, mental health, nutrition, financial wellness, and environmental wellness. The Social Committee sponsors monthly events and activities that are designed to promote a fun work environment while building camaraderie among team members.



## **Anti-Money Laundering Policy**

As Credit Acceptance Corporation's business operations are limited to indirect financing of automobile sales and servicing and collection of retail installment sale contracts, Credit Acceptance is not subject to the anti-money laundering program requirements of the Bank Secrecy Act ("BSA"). However, Credit Acceptance maintains a compliance program with policies and procedures similar to the anti-money laundering requirements of the BSA. This program includes policies, procedures, processes and other internal controls designed to identify, monitor, manage and mitigate the risk of money laundering and engaging in transactions involving sanctioned countries persons and entities identified by the Office of Foreign Assets Control ("OFAC"). Credit Acceptance recognizes risks introduced by third party and business partner relationships and mitigates those risks by, for example, performing annual due diligence and OFAC watchlist screening of dealers, vendors, and service providers. Credit Acceptance controls also include procedures and processes to detect and report suspicious activity, maintenance of an identity theft prevention program to detect, prevent and mitigate identity theft, to "know our customer" by verifying their identity at origination, to respond to requests from law enforcement, and meet all applicable recordkeeping and reporting requirements related to transactions involving currency or monetary instruments.