



AMERICAN ASSOCIATION OF MOTOR VEHICLE ADMINISTRATORS (AAMVA)

AAMVA Vendor Code of Conduct Policy

Expect Integrity:

AAMVA is committed to ethical and lawful behavior, and to acting professionally and fairly in all business dealings and relationships. We seek to maintain the highest ethical standards and to comply with all applicable laws and regulations. Vendors' activities may influence AAMVA's reputation and relationship of trust with our clients and employees, and as such we expect our vendors to maintain the same high standards of legal compliance and ethical commitment.

We expect integrity – of our employees, our directors and our vendors – in all we do. We have a code of conduct for our employees and directors that describe the policies, procedures and principles that they must follow. Likewise, this Vendor Code of Conduct (“Code”) incorporates the principles of lawful and ethical conduct that AAMVA expects of its vendors (and any of their subcontractors, collectively, “vendors”). AAMVA encourages its vendors to have their own code of conduct that addresses business conduct and practices and to maintain a hotline or other mechanism for vendor employees to report any allegations of misconduct on the part of the vendor.

AAMVA requires that its vendors understand the requirements of this Code, operate in accordance with the expectations outlined in this Code and comply, at a minimum, with the letter and spirit of all applicable laws, rules and regulations in the jurisdictions in which they operate. Vendors must be open and cooperative with governmental regulators. Breaches of this Code may result in the termination or non-renewal of agreements under which vendors or sub-vendors furnish services or products to AAMVA. The policies in this Code are not all-inclusive and there may be other conduct not specifically listed that will be considered a breach of the principles in this Code and deemed unacceptable for a vendor or sub-vendor.

BUSINESS PRACTICES

Business and Financial Records

We expect vendors to provide honest and accurate invoices. Invoices should be itemized, quote the PO number (where relevant), be supported by appropriate documentation and comply with all other requirements as set out in the relevant contract(s). Invoices may not be split to circumvent approval requirements

Conflicts of Interest; Gifts and Entertainment

Vendors must disclose all actual or potential conflicts of interest. Disclosures should be made to AAMVA's Compliance Officer as provided below under the heading "Administrative Procedures." Some potential conflicts may be permissible if they are disclosed and approved in advance. Otherwise, conflicts must be avoided.

Many situations can give rise to a conflict of interest or to the appearance of a conflict of interest, such as the following:

- using AAMVA's property, information, or relationships for direct or indirect personal gain;
- providing gifts, entertainment, benefits, compensation, or any other advantages that could influence, or appear to influence, business decisions involving AAMVA; or
- using relationships with AAMVA, such as a spouse, relative or close friend of a member of AAMVA's staff, to obtain work or business from AAMVA.

Vendors should avoid any actions with AAMVA employees during any vendor selection or re-selection process that could give others the impression of favoritism or other improper advantage. Furthermore, vendors should not offer, and AAMVA employees may not accept, gifts or entertainment that might compromise, or appear to compromise, an employee's judgment or independence.

CONFIDENTIAL INFORMATION, PRIVACY AND DATA SECURITY

AAMVA respects the privacy of confidential information received from its member jurisdiction, business partners, employees, and others. Vendors must sign and abide by AAMVA's confidentiality or nondisclosure agreements, which protect the proprietary information of AAMVA and its clients.

Personally Identifiable Information ("PII") is information that can be used to uniquely identify, contact, or locate a single person or can be used with other sources to uniquely identify a single individual. Where vendors handle confidential information or PII on behalf of AAMVA, belonging to AAMVA or its member jurisdictions or business partner's vendors must contractually commit to apply privacy and information security safeguards. Such vendors shall also be subject to an online information security assessment.

Without AAMVA's prior written consent, vendors shall not transmit or take any AAMVA PII to locations outside of the United States of America. Vendors of AAMVA must comply with all other security and confidentiality requirements that AAMVA communicates to vendors.

Confidential information of AAMVA, its employees, member jurisdictions, vendors and business partners who have entrusted non-public information to AAMVA may be available or accessible to vendors in the course of their engagement by AAMVA. Vendors must not disclose confidential information to any person outside of AAMVA, except as required by law. Any disclosure of confidential information outside of AAMVA must be approved in advance in writing by AAMVA.

LABOR AND HUMAN RIGHTS

AAMVA expects its vendors to treat their workers with dignity and respect, and to uphold their human rights.

Fair Treatment and Anti-discrimination

Vendors must provide a workplace free from harsh and inhumane treatment such as sexual harassment and/or corporal punishment, and free from illegal discrimination.

Wages, Benefits and Working Hours

Vendors must comply with local applicable wage laws regarding wages, overtime hours and mandated benefits. Vendors must communicate with workers about compensation, including any overtime pay, in a timely manner.

Freely Chosen Employment

No vendor will use any form of slave or forced labor; this includes involuntary prison labor.

Child Labor

No vendor may use child labor. All employees shall be age 18 and over unless (1) a country's legal age for employment or age for completing compulsory education is under 18 and (2) the work is non-hazardous.

Human Rights Compliance

Vendors shall (and shall ensure that each of their subcontractors shall) comply with all applicable human rights laws, statutes, regulations and codes from time to time in force, including but not limited to the UK Modern Slavery Act 2015. Vendors shall implement due diligence procedures for their own suppliers, subcontractors and other participants in their supply chains, to ensure that there is no human rights violations, including but not limited to slavery, child labor or human trafficking in their supply chain. Vendors shall notify AAMVA as soon as they become aware of any breach, or potential breach, of human rights in their business or supply chain.

Freedom of Association

Vendors must respect their workers' rights to associate together regarding working conditions, and to join unions, form work councils and engage in labor negotiations, including collective bargaining. Vendors shall not intimidate or harass any worker who participates in such associations.

Health, Safety and Respect for Working Environment AAMVA expects vendors to provide a healthy and safe working environment, and to be environmentally responsible to minimize any adverse impacts of operations on the environment.

Protection of Workers

Vendors shall protect workers, and any visitors to their facilities, from exposure to chemical, biological and physical hazards. Vendors shall monitor their workplace for any other safety hazards and provide a safe and secure environment for workers and visitors. Information and training regarding any hazardous materials – including pharmaceutical compounds and pharmaceutical intermediate materials, where applicable – will be provided by vendors.

Mechanism for Reporting Concerns

Vendors should maintain a confidential system for their workers to report any concerns or illegal activities in the workplace without threat of reprisal, intimidation or harassment. If concerns are reported, vendors will investigate and take corrective action where needed.

Processes, Emergency Preparedness and Response

Vendors should have appropriate processes in place to identify, prevent and mitigate any risk of a chemical spill or other event that would pose a threat to worker safety and/or to the environment. These processes include emergency plans in the case of an unsafe event and response procedures should such an event occur.

ADMINISTRATIVE PROCEDURES

Any person who believes that a vendor has violated a standard in this Code must notify AAMVA's Compliance Officer Anita Simmons at 703-908-5895 or asimmons@aamva.org immediately. In the event an individual prefers to place an anonymous report, AAMVA has created a confidential hotline, hosted by Ethics Point, an independent company that provides a confidential way to report potential violations of AAMVA policies as well as any other suspected illegal or unethical activities in the conduct of AAMVA business. AAMVA's Compliance Officer shall promptly investigate reported violations of this Code and take appropriate action where that complaint involves vendors or third party staff.