

Supplier Code of Conduct

Club Car, L.L.C., its subsidiaries and affiliated companies (collectively, “Club Car”) is committed to operating its business with the highest standards of corporate responsibility. We operate within a framework of principles, guidelines, and policies aligned with our ethical, social, and environmental responsibilities. We believe that this is critical for protecting, managing, and enhancing our brand and reputation. We also believe this will drive long-term, sustainable growth for Club Car, our business partners, and the communities in which we operate.

We strive to conduct business with suppliers who share our commitment to operating in a responsible and ethical manner. Club Car’s Supplier Code of Conduct outlines Club Car’s principles of responsible supplier management for ethics, labor, environmental sustainability, health and safety, quality and related management systems (“Principles”).

The Principles are applicable throughout the entire supply chain. In some cases, the Principles may require suppliers to go beyond compliance with locally applicable laws and regulations. Suppliers are required to ensure that their employees and all direct or indirect subcontractors and agents acknowledge and adhere to the Principles and expectations specified in the Supplier Code of Conduct.

Club Car expects suppliers to:

- Integrate and apply the Principles in a manner consistent with their own supplier programs;
- Operate in full compliance with all applicable national and international laws, rules, and regulations;
- Be aware of cultural differences and the challenges associated with interpreting and applying these Principles globally; understand the methods for meeting these expectations may vary and must be consistent with the laws, values, and cultural expectations of the different societies of the world; and
- Integrate the Principles into a continual improvement approach that advances supplier performance over time.

Ethics

We are committed to conducting our worldwide operations in accordance with the highest ethical standards and in compliance with all applicable laws and regulations and we expect the



same of our business partners. Suppliers shall conduct their business in a compliant and ethical manner, with the utmost integrity.

Club Car's expectations of its suppliers include, but are not limited to:

1. Preventing Bribery & Corruption

Suppliers must maintain complete compliance with the U.S. Foreign Corrupt Practices Act, U.K. Bribery Act and all other applicable anti-corruption laws in countries in which they conduct business. All forms of corruption, bribery, extortion and embezzlement are prohibited. Suppliers must never offer, request or accept bribes or permit subcontractors or others to do so on their behalf. Suppliers must implement appropriate, ongoing anti-bribery and corruption controls within their organization to eliminate the risk of non-compliance.

2. Avoiding Conflicts of Interest

Suppliers must avoid any situation that has the potential to influence their independence or personal judgment when engaged in business dealings with Club Car. Suppliers must have appropriate controls and oversight in place to prevent conflicts of interest from affecting procurement and financial decision making.

3. Compliance with Applicable Laws

Suppliers identify and comply with all the applicable national and international laws, regulations, codes and standards, both in the country in which the Supplier is based and in the country in which the service or products will be provided.

4. Animal Welfare

Animals shall be treated humanely with pain and stress minimized. Animal testing should be performed after consideration to replace animals, to reduce the numbers of animals used, or to refine procedures to minimize distress. Alternatives should be used wherever these are scientifically valid and acceptable to regulators.

5. Communication and Records

Suppliers shall safeguard and make only proper use of confidential information to ensure that company, worker, and personal privacy rights are protected. Suppliers must communicate with integrity and in accordance with any confidentiality agreements, disclose information in a timely and appropriate manner, and maintain accurate company books and records. Suppliers must also have appropriate processes to archive and retrieve records that are relevant to investigations or litigations.

6. Trade Controls

Suppliers must comply with all applicable trade and customs laws, regulations, embargoes, economic sanctions and restrictions governed by recognized national and international authorities.

7. Conflict Minerals

Club Car does not support the use of minerals or their derivatives, including tantalum, tin, tungsten and gold (“3TG”), that are illegally mined, transported or traded because of their role such minerals play in financing armed conflict in the Democratic Republic of the Congo and the adjoining countries, as well as in other high-risk and conflict-affected areas around the world. It is our policy to exercise due diligence over our supply chain in a manner consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We solicit our suppliers of material and components containing 3TG to complete the Responsible Minerals Initiative’s Conflict Minerals Reporting Template no less than annually. In doing so, suppliers are expected to promptly respond to each solicitation and, if applicable, identify the smelters or refiners that processed the 3TG in their supplied products along with the country of origin of such 3TG.

Labor

Suppliers shall be committed to uphold the human rights of workers and to treat them with dignity and respect.

1. Prohibiting Forced Labor

Suppliers shall not use forced labor, whether in the form of involuntary prison labor, indentured labor, bonded labor or any other form of human trafficking.

2. Prohibiting Child Labor

Suppliers shall not use child labor. The employment of young workers below the age of 18 shall only occur in nonhazardous work and when young workers are above a country’s legal age for employment or the age established for completing compulsory education.

3. Non Discrimination and Harassment

Suppliers shall not discriminate against their employees or applicants for employment with respect to compensation, terms, conditions or privileges of employment, and shall provide a workplace free of harassment on the basis of any protected category under applicable law, such as race, color, religion, national origin, gender, age, sexual orientation, as well as union membership or political affiliation.

4. Wages, Benefits and Working Hours

Suppliers shall maintain working hours and pay workers according to applicable wage and hour laws, including minimum wages, overtime hours and legally mandated benefits.

5. Freedom of Association and Work Environment

Open communication and direct engagement with workers to resolve workplace and compensation issues is encouraged. Suppliers shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation and join workers’ councils. Suppliers shall provide employees with a safe and healthy workplace and



will endeavor to meet or exceed applicable safety standards. Workers shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

Environmental Sustainability, Health & Safety

Consistent with Club Car's commitment to operating its business with the highest standards of environmental responsibilities for the long-term, sustainable growth for Club Car, our business partners, and the communities in which we operate, Club Car requires its suppliers to comply with all applicable regulatory requirements regarding the environment, health and safety, and shall operate an environmental, health and safety management system which underpins and proves compliance with all such regulatory requirements. Suppliers shall operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment and demonstrate a culture of continual improvement to further reduce resource consumption. With this, suppliers should make practical and demonstrable efforts to minimize the use of energy, water and raw materials. Where possible, these resources should be renewable or sustainably sourced. Suppliers shall make practical efforts to eliminate or reduce levels of generated waste and should reuse and recycle waste materials wherever possible. Suppliers should consider the environmental credentials and performance of suppliers within their own supply chain and have a sustainable procurement policy in place for their own suppliers.

Quality

Club Car is committed to building high quality products. To ensure that we are providing safe and innovative products to our customers, we manufacture our products in compliance with all applicable laws and regulations. In addition, we do extensive product testing and quality assurance.

Similarly, Club Car expects our suppliers to assure the quality, safety and performance of the products and services they provide us. This way, we can assure the quality and safety of the products and services we provide our customers.

Management Systems

Suppliers shall use management systems to facilitate continual improvement and compliance with the expectations of these Principles. The management systems should be easily retrievable and clearly demonstrate compliance with all legal and customer requirements.