

## Human Trafficking and Modern Slavery

At Penske Automotive Group, Inc., we believe it is our responsibility to uphold the highest standards of ethical behavior and personal integrity within our business operations. Wherever we do business, our associates are required to comply with all applicable laws, rules and regulations.

At Penske Automotive Group, Inc., we have a zero-tolerance approach to Human Trafficking and Modern Slavery, and we are fully committed to preventing such acts in our operations and supply chain. As a company, we are committed to protecting our organization and those people at risk from exposure to slavery or human trafficking in our supply chain, both via our direct employees and those working on our behalf via third party suppliers.

Our associates are provided with a company handbook which contains policies that govern their employment, as well as a written contract of employment in some countries outside of the United States. Each associate has a personal responsibility to read the handbook, as well as to ensure that they fully understand the obligations and the consequences associated with the breach of those obligations. We are committed to uncompromising integrity in all that we do and how we relate to each other and to our customers.

We provide a confidential whistleblowing helpline (1-877-888-0002) that encourages our colleagues to report any concerns within the organization, its vendors or suppliers, including any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organizations' whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. These reports are reviewed by the most senior management and board of directors of Penske Automotive Group.

As it pertains to our automotive and truck retail business segments, the supply chain for the manufacturers of automobiles and trucks is one of the most complicated in any industry. The breadth, depth and interconnectedness of the automotive supply chain makes it challenging to effectively manage and mitigate the risk of modern slavery. We also recognize that the nature of the automobile and truck manufacturing industry is such that our supply chain for new and used vehicles is multifaceted as any given vehicle will have its own supply chain for the various component parts. As our relationship is with the manufacturer and not with their supply chain, we rely on the policies, statements and audits of each these manufacturers and their supply chain as disclosed on their websites to affirm our commitment to preventing slavery and human trafficking.