



CODE OF CONDUCT

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OUR CODE OF CONDUCT

Peterson is a company with a long and rich tradition. We have always strived to maintain the highest standards in terms of professional conduct and behavior, and sustainable business practices. From our owners to our senior leaders, to our Field Techs, Sales staff and the entire workforce, we live our values and have consistently maintained a sound moral compass. The purpose of this Code of Conduct is to bring an even clearer focus on our expectations and commitment to maintaining our business, professional and sustainability practices.

This Code of Conduct applies to the employees of Peterson Holding Company, its subsidiaries and affiliates throughout the United States and members of its Board of Directors. While this Code of Conduct describes general principles of legal and ethical conduct, it does not address every issue an employee may face. Each person must exercise good judgment and act within the spirit, as well as the letter, of this Code.

REPORTING RIGHTS AND RESPONSIBILITIES

If an employee or outside stakeholder believes a member of the Peterson team is acting in violation of this CODE OF CONDUCT or in a manner that is not in alignment with our core values, we encourage them to take the following action:

- For issues other than harassment, discrimination, and retaliation, discuss the situation with the individual in question
- If such a discussion does not feel safe, or if the discussion took place but the negative behavior continued, please feel free to contact the Human Resources (HR) Director/Chief Ethics Officer to review the situation, or,
- You may file an anonymous complaint at this website, **anonymousHRemails@petersoncat.com**, or, at this **HOTLINE number: 888-960-9443**
- All complaints will be investigated by the HR team. The investigations will be handled in a discreet, fair, and professional manner. A thorough investigation will be completed prior to the company making a judgment on whether or not the Code of Conduct was violated. If necessary, the matter may be referred to outside legal counsel for assistance.
- Violations of this Code of Conduct may result in discipline, up to and including termination

No Retaliation Policy

We will not tolerate any retaliation or threats of retaliation against anyone who reports in good faith a violation or suspected violation of this policy. Such a violation may result in discipline, up to and including termination. Peterson further prohibits retaliation against any employee because of the employee's opposition to a practice or conduct the employee reasonably believes to be unlawful or because of the employee's lawfully protected participation in an investigation or proceeding. Any retaliatory adverse action because of such opposition or participation may be unlawful and will not be tolerated.

LEADERSHIP

While we expect all of our employees to adhere to the terms of this policy, we expect our leaders to consistently model this behavior. Peterson is very proud of its reputation in the industries it works in and the communities that it serves. Throughout our history, our business has benefited from visionary, innovative, and ethical leadership. We expect our leaders to exceed the industry standard for ethical business and sustainability practices.

INTEGRITY

All Peterson employees are expected to demonstrate a commitment to integrity and ethics. Hallmarks of this commitment include:

- Listen to others for understanding
- Conduct business in accordance with high personal and legal standards
- Assume positive intent – the belief that our fellow employees and key stakeholders are dealing with us in an ethical, honorable, and up front manner
- Tell the truth
- Avoid any real or perceived conflicts of interest
- Deal with others in a fair and honest manner
- Show respect for and value individuals for their diverse backgrounds, experience, style, and ideas
- Honor commitments, be reliable

Peterson strictly adheres to the following policies:

Bribes or Other Payments to Influence Business Transactions

The giving or receiving of any such payment is indefensible. No bribes or kickbacks of any sort may be paid or accepted from customers, politicians, government representatives, and consultants.

Gifts & Entertainment

- Special care must be taken in accepting or giving gifts and entertainment. These are not permitted if it would create an actual or perceived conflict of interest. The exchange of social courtesies is acceptable when there is a clear business purpose and remain within acceptable limits. Neither the receipt nor the giving of excessive gifts, entertainment, or favors is acceptable.
- Sales – as a matter of practice sales employees are expected to foster positive relationships with our customers. This may include providing meals, participating in or sponsoring social and/or recreational events (including golf, fishing, and other sporting events). The intent of the policy is not to hinder such practices. However, we must exercise care to make sure these practices are transparent and do not cross any ethical

barriers. If you have a question whether a proposed activity or event is appropriate you should review with HR or the senior sales official in your area. Sales employees must also be familiar with our customers' policies in this area and make sure there are no conflicts.

The following are examples of gifts or entertainment that may be accepted:

- Gifts of minimal value (less than \$100), i.e. logo items, flowers, candy, fruit baskets
- Product samples of nominal value
- Modest refreshments or meals
- Modest entertainment (concert, sports event)
- Modest gifts at the holidays

If you are in doubt as to whether a gift or entertainment is appropriate, you should raise your concerns with HR prior to accepting or giving any such gift.

Conflicts Of Interest

Employees have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. This policy establishes only a general framework within which Peterson wishes the business to operate. The purpose of this Code of Conduct is to provide general direction so that employees can seek further clarification on issues related to the subject of acceptable standards of operation. If you suspect you may have a conflict of interest, whether actual or potential, please raise your concerns immediately with your manager and/or HR. Willful violations of these rules may result in discipline, up to and including termination.

Whether real or perceived, conflicts of interest must be avoided. Some examples of potential conflicts include:

- Accepting personal payments from suppliers
- Directly or indirectly working or consulting for a competitor
- Conflicts between personal and professional relationships
- Holding a job outside of Peterson that impacts your ability to perform your Peterson job up to management's expectations

Situations that result in actual or even potential conflicts of interest must be avoided by all employees. Personal, social and economic relationships with competitors, suppliers, customers or co-employees that may impair an employee's ability to exercise good judgment on behalf of the Company or which give the appearance of such an impairment create an actual or potential conflict of interest. Any employee involved in such a relationship must immediately and fully disclose the nature of the relationship to Management so a determination can be made as to whether an actual or potential conflict exists, and if so, how to correct the situation.

No “presumption of guilt” is created by the mere existence of a relationship with outside firms. However, if employees have any influence on transactions involving purchases, contracts, or leases, it is imperative that they disclose to an officer of Peterson as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

Personal gain may result not only in cases in which an employee or relative has a significant ownership in a firm with which Peterson does business, but also when an employee or relative receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving Peterson. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

Outside activities (second jobs, side businesses, clubs, etc.) must not interfere with your ability to fully perform your job duties at Peterson or create a conflict of interest with your statutory duty of loyalty to the Company.

Violations of Peterson’s Conflict of Interest policy may result in disciplinary action up to and including termination.

ACCOUNTABILITY

We are each accountable for our own actions. Hallmarks of accountability include:

- Keep promises and commitments
- Take personal accountability for our actions
- Personally commit to the success and well-being of the team and company
- Admit and take ownerships for errors, learn from our failings

OUR EMPLOYEES

- We provide a family oriented environment that promotes safety, as well as opportunities for personal growth, and professional achievement. Our people commit themselves to exceed the expectations of the customer, Peterson, and each other.
- We respect and recognize the contributions of our employees and other stakeholders.
- We will provide an environment that is safe for our employees and the communities where we do business.

Equal Employment Opportunity (EEO)/Affirmative Action

Peterson does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, genetic information, sexual orientation, gender identity, national origin, age, disability, protected veteran status, pregnancy, or any other characteristic or action protected by law. Please see Peterson’s Equal Employment Opportunity Policy for further information.

Sexual and Other Unlawful Harassment

We will provide an environment free of harassment, discrimination, and intimidation. Please see Peterson's Prohibited Harassment Policy for further information.

Americans with Disabilities (ADA)

Peterson is committed to complying fully with the Americans with Disabilities Act (ADA) and applicable state law in ensuring equal opportunity in employment for qualified persons with disabilities. All employment practices and activities are conducted on a non-discriminatory basis. Please see Peterson's Equal Employment Opportunity Policy for further information.

Drug and Alcohol Policy

An employee's abuse of drugs and alcohol jeopardizes the safety of co-workers and the public and creates a risk of harm to the reputation of the Company. To promote on-the-job safety, comply with applicable laws, enhance our team efforts to provide a productive, safe and accident-free work place and promote a working environment free from the influences of alcohol and/or illegal drugs, we have established a zero tolerance policy which is part of the Company's commitment to a drug-and-alcohol-free workplace. Please see the Company's Drug and Alcohol Use Policy for further information.

OUR CUSTOMERS & COMPETITORS

- We will deal with our customers in a fair and equitable manner. We will be our customer's first choice, the recognized leader where we compete, the company most admired for our people, performance, and innovation. We will not sacrifice our values to placate a customer, or to unduly influence or compromise a customer.
- We will compete with determination and vigor, with the goal of always winning where we compete. We will leverage our product quality, experience, innovations, and expertise to dominate the marketplace. We will compete with honor, intensity and integrity. We will not engage in or tolerate unethical or deceitful practices.
- When dealing with customers we will demonstrate a proper sense of urgency and empathy. We will communicate in a courteous manner and provide follow up in a way that exceeds their expectations. We will differentiate Peterson from the competition by adding value in all aspects of the customer relationship. We will treat our customers and vendors fairly, and in a way that promotes a long term, mutually beneficial relationship.

HUMILITY

- Never underestimate our competition
- Have the hunger and humility to learn
- Never take our market leadership for granted
- Maintain a healthy dissatisfaction with the status quo
- Be an organization of life-long learners and innovators

- Know that our business and reputation have been built on a foundation of ethical behavior and best business practices, and we will work in an ethical manner to sustain the business for the long term

RESULTS

We must deliver against our strategic goals:

Hitting our financial targets, our goals in the area of market share, our desire to dominate the Prime Product Market, to grow Parts & Service revenue, while maintaining customer loyalty. To these ends we are committed to:

- Achieve results and celebrate when we do
- Help people to be their best by providing coaching and feedback
- Work with others as a team to accomplish results and win
- Make the tough calls
- Prize results over form – value substance and performance over politics and image

OUR COMMUNITIES

We will be outstanding corporate citizens in every community where we do business. This commitment includes:

- Managing in a Responsible manner – wherever we conduct business or invest our resources, we know that our commitment to financial success must also take into account social, economic, political and environmental priorities. We believe that our success should also contribute to the quality of life and the prosperity of communities where we work and live.

PROPRIETARY INFORMATION

- All employees are expected to protect, preserve and refrain from disclosing or disseminating to third parties all sensitive, confidential, and proprietary information belonging to the company, including the company's trade secrets. Such protected information includes, without limitation, customer lists, and other customer-related information, financial data, strategic business plans, sales, marketing and business strategies, information about new products, services and innovations, and other similar non-public, sensitive and confidential information. In addition, no Peterson employees should ever attempt to obtain without authorization, or use or disseminate the propriety information of another company, including competitors of Peterson.
- The obligation to protect and refrain from disclosing confidential, proprietary information described above also applies to similar information that you may have access to or come into contact with belonging or relating to Peterson customers. These obligations also apply following the termination of your employment from Peterson for any reason.

- If you have any questions about this policy, or whether information or materials are considered confidential and proprietary, please contact Human Resources. Please see Peterson's Confidential Information Policy for further information.

INFORMATION SECURITY

- Employees will allow access to information contained in or obtained from Peterson systems only to authorized people.
- Employees will protect all confidential information from unauthorized disclosure.
- Internet access is provided for business use only and computer files and systems are the property of Peterson.
- Employees should not download copy or receive files or data onto Peterson systems except when required to perform their duties.
- Employees will not share, record, copy, transmit, delete, or in any way alter information on Peterson systems except when required to perform their duties.
- All employees are expected to take reasonable precautions to prevent unauthorized access to passwords, user identifications, or other information that may be used to access information systems.
- Employees will abide by all licensing and copyright agreements and laws.
- Employees should be on their best behavior and exercise sound judgment when using email, social media or any Peterson systems.
- Company equipment (phones, computers, etc.) containing sensitive or confidential information must be maintained in a secure manner, both at work and when such equipment is being used off site. Please see Peterson's Electronic Communications System Policy for further information.

SUSTAINABILITY

Peterson supports sound environmental stewardship and strives to promote sustainable business practices related to its products and services. We are committed to workers' rights and maintaining healthy and safe workplaces and conditions. We work to reduce waste, conserve water and energy in our office and service operations. We are committed to complying with environmental laws and regulations and expect our suppliers to do the same. We will work with our customers in their efforts to operate in an economic and environmentally sustainable manner.

PETERSON'S VISION, MISSION, AND VALUES STATEMENTS



PETERSON
Since 1936

VISION

“We will be our customers’ first choice.”

MISSION

“Peterson partners with our customers in building the future. We put our customers first and continually strengthen our partnerships through hard work, ingenuity and determination.

We provide a family oriented environment that promotes safety, personal growth and professional achievement. Our people commit themselves to exceed the expectations of the customer, Peterson and each other.

We will remain true to our values and set standards of excellence in everything we do.”

CORE VALUES

<p>CUSTOMER FIRST The reason we exist!</p> <ul style="list-style-type: none"> • Urgency • Empathy • Communication • Courtesy • Follow Up • Value Added 	<p>INTEGRITY We do what we say!</p> <ul style="list-style-type: none"> • Honesty • Fairness • Trust • Reliable 	<p>EXCELLENCE Best in all we do!</p> <ul style="list-style-type: none"> • Continuous Improvement • Safe • Done Once - Done Right • Hustle 	<p>TEAMWORK Together we do what we couldn't do alone!</p> <ul style="list-style-type: none"> • Collaboration • Respect • Commitment • Loyalty • Communication • Willingness 	<p>FUN We enjoy what we do!</p> <ul style="list-style-type: none"> • Positivity • Enthusiastic • Friendly • Humor
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