



March 22, 2019

Transparency in Supply Chains Disclosure

Warn Industries ("Warn") is strongly opposed to the use of forced, bonded, involuntary, prison or indentured labor. At Warn we are constantly evaluating our supply chain to assess various compliance risks, including those related to slavery and human trafficking.

Steps to Assess and Manage Risks

The following information describes our company's efforts to date and our future plans to eradicate slavery and human trafficking from our supply chain:

- As a supplement to our ongoing compliance training programs, we have training for our supply chain personnel focusing specifically on slavery and human trafficking issues and ways to identify and mitigate, to the greatest extent possible, these elements from our supply chain.
- We have the Warn Supplier Code of Conduct, which addresses our commitment to seek out business partners who share our values and specifically prohibits our suppliers from using forced, bonded, involuntary, prison, or indentured labor.
- LKQ's Code of Ethics requires our employees to comply with employment-related laws, including those related to wages, hours, and minimum age requirements. Our Code of Ethics and our use of the Supplier Code of Conduct are important steps in gaining supplier compliance.
- We take violations of our Codes very seriously. For example, violations of the Supplier Code may result in termination of the supplier relationship, while violations of the Code of Ethics may result in termination of employment.
- We often require our suppliers confirm that they adhere and will continue to adhere to our Supplier Code of Conduct. In some cases, we perform site visits or audits of our suppliers to assess quality and compliance. While we are not currently verifying or auditing that all our suppliers comply with local laws regarding slavery and human trafficking, we will continue to assess our supply chain for areas of improvement in eradicating slavery and human trafficking, and will continue to expect our suppliers to do the same.

This disclosure meets the requirements of the California Transparency in Supply Chains Act of 2010 and the UK Modern Slavery Act 2015, and sets out the steps that Warn Industries has taken to ensure that forced labor and human trafficking is not taking place in its business and supply chains.