

Political Contributions and Activities

POLICY:

AutoNation complies with all federal, state and local laws regarding Political Contributions and activities. Some governments prohibit or restrict the use of corporate funds, assets or services on behalf of a political party or candidate. To ensure that we comply with these laws, we may not make any Political Contribution of Company funds, property or services to any political party or committee, or to any candidate for or holder of any office of any government, without prior review by and approval of AutoNation's General Counsel. In addition, we do not pressure Associates - directly or indirectly - to make any Political Contribution or support a political party, political action committee or the political candidacy of any individual.

This Policy applies to every AutoNation Associate.

DEFINITIONS:

Political Contribution: Any direct or indirect payment, loan, advance, deposit, gift of money, services or anything of value to any candidate, campaign committee or political party in connection with any election. Contributions include, among other things, cash, cash equivalents, donation of property or services, donation of use of property or facilities and purchases of tickets to fundraising events.

DISCUSSION:

Political Contributions from Corporate Assets:

The federal government and many state governments do not allow Political Contributions by corporations, either directly or indirectly. You may not cause AutoNation or any of its subsidiaries, business units or offices to make any Political Contribution or expenditure from corporate funds or resources (which includes monetary contributions as well as the use of corporate facilities or personnel) to any candidate, campaign committee or political party in connection with any election without prior review and approval by AutoNation's General Counsel.

The following are some examples of Political Contributions that may be prohibited by law and that must not be made without prior approval by the General Counsel:

- Cash contributions from AutoNation funds to a political candidate;
- Contributions of any AutoNation-owned equipment, even if the equipment is no longer used by the Company or the use is temporary in nature;
- Use of work time to perform activities for a political party;
- Use of any AutoNation owned or leased equipment, such as computers, copiers, or vehicles, whether that use takes place on or off AutoNation grounds; and
- Use of AutoNation facilities.

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Solicitation of Contributions:

You must never use your position with AutoNation to solicit Political Contributions from other Associates. We do not – directly or indirectly – pressure Associates to support a political party or the political candidacy of any individual. Solicitations for contributions to AutoNation's Political Action Committee (PAC), if any, must comply with all applicable laws and regulations and be directed by AutoNation's General Counsel.

Personal Political Contributions:

AutoNation encourages you to participate in the political affairs of your community and country on an individual basis, including by making contributions using your personal funds. AutoNation will not reimburse or otherwise compensate you or anyone else for Political Contributions of any nature.

Personal Political Activities:

Associates running for public office, serving as a public official, or campaigning for a political candidate cannot be paid by AutoNation for any time spent on these activities. Thus, Associates may not engage in these activities during working hours without the prior written approval of AutoNation's General Counsel. Moreover, Associates may not use Company facilities or personnel in connection with such activities without prior approval from AutoNation's General Counsel.

With regard to requests for leaves of absence to assume government appointments or elective office (local, state or national), advance approval from the Associate's manager and AutoNation's Legal Department is required. In the case of an elective office, this approval must be received prior to accepting the nomination or filing to run for office.

Associates holding any public office or serving on commissions or advisory groups should be alert to any actual, apparent or potential conflicts of interest with their duties as an Associate of AutoNation. Associates serving as public officials should maintain separation between their role as an AutoNation Associate and a public official. Additionally, neither managers nor other Associates should try to exert undue influence over another Associate's actions in that Associate's role as a candidate or public official.

Full-time and part-time Associates and those on political leave serving as public officials should:

- Adhere strictly to applicable laws and reporting regulations governing the proper conduct for candidates or public officials;
- Avoid conflicts of interest between the Associate's public office and his or her position at AutoNation; and
- Not speak for nor act on behalf of AutoNation while carrying out responsibilities as a public official.

QUESTIONS AND REPORTS OF CONCERNS:

To seek guidance or report suspected or known violations of this Policy, contact your manager, another manager with whom you feel comfortable speaking, your Human Resources representative, the Legal Department, the Business Ethics Committee, or the Alertline (**1-800-597-0094** or **autonation.ethicspoint.com**) where you can report anonymously if you choose.