

SOLERA AUTO FINANCE, LLC

POLICY AND PROCEDURES FOR COMPLAINTS REGARDING ACCOUNTING, INTERNAL ACCOUNTING CONTROLS, OR AUDITING MATTERS

(As adopted on July 1, 2022)

Solera Auto Finance, LLC (the “Company”) is dedicated to conducting business with efficiency, fairness and integrity and encourages behavior that will maintain the public’s confidence and trust in its operations.

To help meet these expectations executive management has developed, and the Company has adopted, the following policy to ensure that employees of the Company are aware of the various means by which they should report unethical conduct regarding the Company’s accounting, financial reporting, internal controls or auditing matters and to ensure that procedures are in place for receipt, retention and treatment of these complaints and issues.

POLICY

Solera Global Corp., the indirect parent of the Company (“Parent”) and the Company provide multiple means by which employees of the Company may report these concerns regarding questionable accounting, financial reporting, internal controls or auditing matters of the Company on a confidential basis. Employees should report such activities by contacting the Chief Executive Officer of the Company, General Counsel of the Company and/or Vice President of Internal Audit of the Parent (the “Company Contact”) through one of the following means:

Telephone

The Parent has engaged Signius Communications, an independent company specializing in global employee hotlines. Signius has representatives available 24 hours a day, 365 days a year to handle employee telephone calls. The toll-free telephone numbers available to employees are set forth on Schedule A attached hereto. Schedule A may be amended from time-to-time as the Company adds new or changes existing telephone numbers. Telephone calls received by Signius will be transcribed and delivered to the Company Contact.

Email

The Parent has established an email account with Signius. Employees can send emails to Signius using the following email address: soleraholdings@signius.com. Emails received by Signius will be forwarded to the Company Contact.

Writing

Employees can write to the Company Contact at:

If to the Chief Executive Officer or General Counsel of the Company, 7301 N. State Highway 161, Irving, TX 75039

If to the Vice President of Internal Audit of the Parent, 1500 Solana Blvd., Bldg. 6, Ste. 6300, Westlake, TX 76262.

Whether making a report through the Hotline or in writing, the employee should give sufficient specific information in the message so that a full investigation can be conducted.

It is a serious violation of the policies of the Company, and under certain circumstances a violation of federal or local law, for any manager of the Company to initiate or encourage reprisal against an employee or other person who in good faith reports a known or suspected violation of criminal law or any other matter which may be reported under this policy.

The office of the Company Contact will conduct an investigation of the matter as appropriate based on the nature of the matter. This investigation may include hiring outside advisors such as lawyers, accountants and auditors to conduct procedures under the direction of the Company Contact. The Company Contact designee will respond to the employee as appropriate, and if the employee has requested a response and included contact information in their request, via the independent service. The Company Contact will retain appropriate records of the complaints, investigations and resolutions for the legally required retention periods.

I. PROCEDURES FOR COMPLAINTS

A. Scope of Matters Covered by These Procedures

These procedures relate to complaints or concerns regarding accounting, financial reporting, internal accounting controls or auditing matters of the Company (“Complaints”), including, without limitation, the following:

- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- fraud or deliberate error in the recording or maintaining of financial records of the Company;
- deficiencies in or noncompliance with the Company’s internal accounting controls;
- misrepresentations or false statements to or by a senior officer of the Company or an accountant regarding a matter contained in the financial records, financial reports or audit reports of the Company; or
- deviation from full and fair reporting of the Company’s financial condition.

B. Submission and Receipt of Complaints

All Complaints will be promptly reported to the Company Contact. Persons with Complaints should submit them to the Company Contact in writing to assure a clear understanding of the issue or concern raised. Complaints may, however, be submitted by email, telephonically or in person. Electronic submissions may be emailed to soleraholdings@signius.com. Telephonic submissions may be phoned to the Hotline telephone numbers set forth on Schedule A. All emails and telephone calls will be handled by Signius Communications, an independent company specializing in global employee hotlines. Regardless of the medium, the Company Contact will maintain the confidentiality of persons making Complaints to the fullest extent reasonably practicable and within the legitimate needs of law and any ensuing evaluation or investigation. Complaints by employees may also be submitted anonymously.

C. Content of Complaints

To assist in the response to or investigation of a Complaint, the Complaint should be factual rather than speculative, and contain as much specific information as possible to allow for proper assessment of the nature, extent and urgency of the matter that is the subject of the Complaint. Without limiting the foregoing, the Complaint should, to the extent possible, contain the following information:

- the alleged event, matter or issue that is the subject of the Complaint;
- the name of each person involved;
- if the Complaint involves a specific event or events, the approximate date and location of each event; and
- any additional information, documentation or other evidence available to support the Complaint.

Complaints that contain unspecified wrongdoing or broad allegations without verifiable evidentiary support will reduce the likelihood that an investigation based on such Complaints will be initiated. In addition, it is less likely that an investigation will be initiated in response to an anonymous Complaint due to the difficulty of interviewing anonymous complainants and evaluating the credibility of their Complaints.

D. Retention of Complaints

The Company Contact shall maintain a file for all Complaints. If the Company Contact receives an unwritten Complaint, he or she shall memorialize such Complaint in writing and place it in the Complaint file.

E. Treatment of Complaints

1. *Initial Evaluation and Response*

The Company Contact shall conduct an initial evaluation of each Complaint and seek to respond to the Complaint to the satisfaction of the person who made the Complaint. The Company Contact may also, in his or her discretion, bring the Complaint to the attention of the Company's full Board of Managers, Chief Executive Officer, Chief Financial Officer, other officers and personnel, outside auditors, outside counsel or any other party that the Company Contact deems necessary or appropriate.

2. *Confidentiality/Anonymity*

The Company Contact any investigation team members shall maintain the anonymity or confidentiality of the person making the Complaint to the fullest extent reasonably practicable within the legitimate needs of law and any ensuing evaluation or investigation. Legal or business requirements may not allow for complete anonymity, and in some cases it may not be possible to proceed with or properly conduct an investigation unless the complainant identifies himself or herself. In addition, persons making Complaints should be cautioned that their identity might become known for reasons outside of the control of the Company Contact. Should a complainant self-disclose his or her identity to persons other than the Company Contact or any members of the investigation team, the Company shall no longer be obligated to maintain such confidence. The identity of the persons subject to or participating in any inquiry or investigation relating to a Complaint shall be maintained in confidence subject to the same limitations.

3. *Investigations*

a. *Initiation of Investigations*

The Company Contact may initiate an investigation based upon a Complaint. The Company Contact may, in its discretion, appoint a person other than the Company Contact to initiate and direct an investigation, including an outside attorney. An attorney, or the Company Contact, who initiates and directs an investigation, is referred to herein as "Counsel." If

Counsel initiates an investigation, he or she may utilize such Company personnel as he or she sees fit. Such personnel are referred to herein as an “Investigation Team.” The role of the Investigation Team with respect to a Complaint is to assist Counsel in collecting, digesting and analyzing information which Counsel, as legal counsel, needs to fully understand in order to render effective legal advice and representation to the Company with respect to a Complaint. Counsel may hire outside advisors (including, without limitation, forensic accountants) to be part of an Investigation Team or otherwise assist in an investigation.

Information to which the Investigation Team will have access during an investigation may be confidential and privileged, and will be communicated in the presence of the Investigation Team in order to assist Counsel in collecting and understanding the information necessary to render effective legal advice.

The decision whether or not to initiate or conduct an investigation shall not be deemed an accusation against any person, and any investigation shall be treated as a neutral fact-finding process.

b. Investigation Report and Follow-Up

After completing an investigation of a Complaint, General Counsel or the Company Contact shall prepare a written report explaining his or her conclusions and advice with respect to the Complaint. A copy of the report shall be placed in the Complaint file. In most cases, the investigation will be led by the Parent’s Internal Audit team, and as such, this report will be prepared by internal audit and approved by the Company Contact.

II. RULES, RIGHTS AND RESPONSIBILITIES OF EMPLOYEE COMPLAINANTS AND INVESTIGATION PARTICIPANTS

A. Employee Complainants

Company employees who submit Complaints (“Employee Complainants”) have a responsibility to provide initial information that is grounded in a reasonable belief regarding the validity of a Complaint. The motivation of an Employee Complainant is irrelevant to the consideration of the validity of the Complaint. However, the intentional filing of a false Complaint, whether orally or in writing, may itself be an improper activity and one that may result in disciplinary action.

An Employee Complainant has a responsibility to be candid and set forth all known information regarding a Complaint to the Company Contact and the Investigation Team. An employee making a Complaint acknowledges that an investigation may not proceed if the employee does not agree to be interviewed by the Company Contact, Counsel or an Investigation Team or provide further information regarding the Complaint.

Employee Complainants are not to act on their own in conducting any investigative activities, nor do they have a right to participate in any investigative activities other than as requested by the Company Contact or the Investigation Team. An Employee Complainant shall not be part of an Investigation Team unless expressly requested by the Company Contact. An Employee Complainant shall refrain from obtaining evidence relating to a Complaint for which he or she does not have a right of access. Such improper access may itself be an illegal or improper activity and one that may result in disciplinary action.

The Company will use reasonable efforts to provide each Employee Complainant with a response to his or her Complaint and a summary of the outcome of any investigation based upon the Complaint unless Counsel determines that there are overriding legal or company/public interest reasons not to do so.

Employee Complainants are entitled to protection from retaliation for having made a Complaint or disclosed information relating to a Complaint in good faith. The Company shall not discharge, demote, suspend, threaten, harass or in any manner discriminate against an Employee Complainant in the terms and conditions of employment based upon any lawful actions of such Employee Complainant with respect to good faith reporting of Complaints. An Employee Complainant's right to protection from retaliation does not extend immunity for any complicity in the matters that are the subject of the Complaint or an ensuing investigation.

These procedures are in no way intended to limit employee reporting of alleged violations relating to accounting or auditing matters to proper governmental and regulatory authorities.

B. Investigation Participants

Company employees who are interviewed, asked to provide information or otherwise participate in an investigation of a Complaint, including employees who are the subject of the investigation ("Investigation Participants") have a duty to cooperate fully with the Company Contact, Counsel and the Investigation Team and assist in the investigation.

Investigation Participants should refrain from discussing the investigation or their testimony with those not connected to the investigation. If the Investigation Participant knows the identity of the Employee Complainant, the Investigation Participant should not discuss with the Employee Complainant the nature of evidence requested or provided, or testimony given to the Company Contact, Counsel or the Investigation Team unless authorized by such person or team.

Requests for confidentiality by Investigation Participants will be honored to the fullest extent reasonably practicable within the legitimate needs of law and the investigation.

Investigation Participants are entitled to protection from retaliation for having participated in an investigation. The Company shall not discharge, demote, suspend, threaten, harass or in any manner discriminate against an Investigation Participant in the terms and conditions of employment based upon any lawful actions of such Investigation Participant with respect to good faith participation in an investigation. An Investigation Participant's right to protection from retaliation does not extend immunity for any complicity in the matters that are the subject of the Complaint or an ensuing investigation.

SCHEDULE A

The following Toll-Free numbers are available to all employees in the countries listed below:

Country	Toll Free Hotline Number
USA	800-770-1646
Australia	0011-80046783100
Austria	00-80046783100
Belgium	0800 78 157
Brazil	0800-8922019
Canada	011-80046783100
China	400 120 1828
Columbia	01 800 5185291
Czech Republic	800700677
Finland	0800 413628
France	0 805 98 55 37
Germany	00-80046783100
Hungary	80 088 206
India	000-800-050-1477
Italy	00-80046783100
South Korea	080 880 0234
Lithuania	8 800 00 036
Mexico	001-8005146060
Netherlands	00-80046783100
North Macedonia	0800 8 05 09
Poland	008-001124153
Portugal	00-80046783100
Romania	0800 360 640
Russia	810-80029241012
Serbia	0800 300157
Slovakia	0800 001 620
South Africa	080 099 9657
Spain	900 876 130
Switzerland	0800 564 400
UK	00-80046783100

For employees located in a country not listed above, please use the email option described below, writing option described in the Policy, or use one of the other listed numbers when traveling to a country where a toll-free number is available.

This email address is available to all employees.

Email: soleraholdings@signius.com