



LKQ CORPORATION SPEAK UP POLICY

1. Purpose

The purpose of this Policy is to reinforce and reaffirm LKQ's commitment to an open speaking up process in which employees are encouraged to raise any concerns of suspected misconduct. In today's environment, LKQ employees remain the company's first and best line of defense against misconduct. When employees report suspected misconduct, LKQ can take prompt, corrective action to fix it.

LKQ recognizes that the early detection and reporting of suspected misconduct depends on maintaining a culture of trust and integrity in which all employees:

- Are encouraged to report suspected misconduct as soon as possible, knowing that their concerns will be taken seriously.
- Know and use the channels available to them to report concerns of suspected misconduct.
- Trust that the speaking up process is as confidential as possible and has no tolerance for retaliation or retribution.

2. Scope

Subject to any applicable local law, this Policy is available to every current and former officer, employee, or associate of LKQ and any party with whom LKQ has or had a business relationship (such as LKQ's customers, suppliers, contractors, agents, and distributors). This Policy is also available to any relatives or dependents of any of the above, or to any other individual as prescribed by applicable law.

Examples of concerns that can be raised under this Policy include:

Business Integrity	Anti-Competitive Behavior	Conflicts of Interest
	Bribery and Corruption	Customer Relations
Data Protection	Cyber Security Concerns	Release of Proprietary Information
	Privacy Concerns	
Environment, Health & Safety	Environmental Concerns	Safety Issues & Sanitation
	Product Quality Concern	Substance Abuse
Financial Integrity	Accounting/Audit Irregularities	Kickbacks
	Falsification of Company Records	Unauthorized Discounts
	Insider Trading	
Fraud/Theft	Fraud	Theft of Cash
	Fraudulent Insurance Claims	Theft of Goods/Services
	Improper Loans to Executives	Theft of Time
Law & Policy	Jeopardizing Public Services/ Undertaking	Violations of Law or Regulations
	Policy Issues	
Workplace Environment	Discrimination	Sexual Harassment
	Employee Relations	Wage/Hour Issues
	Retaliation for Raising a Concern	Workplace Violence/Threats

3. How to Raise a Concern

LKQ requires employees to report all instances of suspected misconduct in the workplace to ensure that all allegations are thoroughly investigated, and suitable action is taken where necessary. Employees can choose to speak to someone about suspected misconduct or put it in writing. Generally, the employee's supervisor or manager will be in the best position to resolve a concern, but other resources include LKQ's:

- Next level of management
- Human Resources Department
- Legal Department
- Corporate Audit Department
- Speak Up Hotline at lkqcorp.ethicspoint.com

In addition, there may be certain circumstances where individuals believe that they cannot communicate a concern using any of the channels listed above. In such a situation, that individual may communicate directly with the LKQ Board of Directors:

LKQ Board of Directors
LKQ Corporation
500 West Madison Street Suite 2800
Chicago, Illinois 60661

Any reports made should include sufficient detail to allow LKQ to investigate the matter fully. For example, it is important to provide information about the names of the people allegedly involved in, or witness to, the incident(s), the dates and times of the incident(s) (approximate or exact), where the incident(s) occurred, and why the reporter believes the incident(s) should be reported. Insufficient detail may prevent LKQ from addressing the matter appropriately.

4. Confidentiality is Respected

If an individual reports suspected misconduct in good faith under this Policy, their identity and the information they provide will be shared only on a "need-to-know" basis as necessary to conduct an adequate investigation or to resolve the concern.

Additionally, reporters may report suspected misconduct anonymously in those countries where it is legally permissible. However, as it is much more difficult and often impossible to investigate suspicions which are reported anonymously, reporters are strongly encouraged to give their identity.

5. No Retaliation

LKQ understands that employees are sometimes worried about possible repercussions associated with complaints of suspected misconduct. LKQ encourages openness and will support any employee who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.

LKQ will not tolerate retaliation or detrimental treatment against any employee who in good faith reports suspected misconduct or participates in an investigation into suspected misconduct. Any employee found to have retaliated against another employee for reporting suspected misconduct or assisting in an investigation into suspected misconduct will be subject to appropriate discipline, up to and including the possible termination of employment. Retaliation includes, among other things, dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a

concern. If an employee believes that they have suffered any such treatment, they should either inform their Legal Department or use the Speak Up hotline.

Alleging retaliation does not negate legitimate performance issues. LKQ fairly evaluates each employee's performance and the fact that an employee has raised a concern in the past does not protect them from performance related actions.

6. Investigative Process

Once an employee raises a concern, LKQ will evaluate it to determine the appropriate next steps.

In some cases, LKQ may appoint an internal or external investigator or team of investigators, including staff with relevant investigative experience or with special knowledge of the subject matter, to determine objectively what happened and whether such an occurrence violated the law or LKQ policy. All investigators will treat witnesses in a professional manner and with dignity and respect. At the conclusion of any investigation, the investigators may make recommendations for change to enable LKQ to minimise the risk of future misconduct.

LKQ will aim to keep any employee who raises a concern informed of the progress of any investigation and its likely timetable for completion. However, sometimes the need for confidentiality and legal considerations may prevent LKQ from giving the employee specific details of the investigation or any disciplinary action taken as a result.

It is a very serious matter to knowingly raise a false concern. If LKQ determines that a false complaint has been made maliciously, in bad faith, or with a view towards personal gain, LKQ may conclude that such actions amount to gross misconduct, warranting discipline up to and including the possible termination of employment.

7. Cooperation

All employees are expected to cooperate fully with any LKQ-designated investigators, providing complete and truthful information. Any employee who fails to cooperate with an LKQ investigation or lies to or misleads LKQ will be subject to disciplinary action up to and including termination of employment.

Employees who have been informed or become aware of ongoing investigations for which they have potentially relevant records (e.g., memoranda, electronic mail, instant messages, files, notes, photographs, and recordings, etc.) must retain these records and provide them to LKQ. Any employee who knowingly destroys or alters potentially relevant records or information will be subject to disciplinary action up to and including termination of employment.

8. Compliance Monitoring and Enforcement

Monitoring of the effectiveness of this Policy will be undertaken by an Investigations Council, that includes Legal, HR and Corporate Audit.

The Investigations Council will provide regular reports to the Audit Committee at least four times a year. These reports summarize the concerns by subject matter and include the status of significant matters that are under review or investigation in response to a concern. This approach ensures that concerns are raised to both leadership and the Board of Directors in an effective manner that accurately informs them of the nature and frequency of the concerns.