

Code of Business Conduct and Ethics

CDK GLOBAL FUNDAMENTALS

- Always act with integrity
- Use good judgment and common sense
- Treat others with respect and dignity
- Comply with this Code, CDK policies, and the law at all times
- Ask for help if you have questions
- Be accountable for your actions
- Report anything that doesn't seem right

QUESTIONS

Any questions regarding this Code of Business Conduct and Ethics can be directed to ethics@cdk.com.

REPORTING CONCERNS

If you are concerned that an actual or potential violation of this Code has occurred or have questions about how this Code applies, there are several ways to address your questions or report your concerns. You may contact:

- Your manager or supervisor
- The CDK Chief Ethics Officer at 847.475.4039
- The CDK Ethics and Compliance Office at ethics@cdk.com
- The CDK Legal Department
- The Audit Committee of the CDK Board of Directors by sending a detailed note, with relevant documents, to Audit Committee of CDK Global, 1950 Hassell Road, Hoffman Estates, IL 60169.
- In North America, the UK, India and anywhere permitted by local law, you can also report your concern to the CDK Ethics Hotline:
 - In the United States call 1.800.461.9330 to report the issue with the help of a call center representative
 - Outside the United States, place a reverse charge or collect call to +1.720.514.4400 to report the issue with the help of a call center representative and a language interpreter. Additional international dialing instructions can be displayed in your preferred language at cdkglobalethics.com
- Online at cdkglobalethics.com (Available 24 hours a day, 7 days a week). Where permitted by local law, you will be given the option to remain anonymous.

HOW TO USE THIS CODE

Read this Code carefully and let it guide you in handling the situations that you encounter every day. If you wish to locate a specific topic, you can use the table of contents and search features to assist you. If you have any questions, please contact one of the resources referenced in this Code.

A MESSAGE FROM BRIAN MACDONALD

Our company's reputation and culture are fundamental to our success.

Our business is a relationship business. With our customers, vendors, shareholders, employees and other stakeholders, we must build our relationships on a foundation of integrity. Integrity is "doing the right thing, even when no one is watching" and at CDK, integrity is a fundamental value. This means having honest conversations, even when the news is not favorable, making the tough decisions because it is the right thing to do, acting in accordance with laws and policies, and speaking up when you see something that is not right. It also means treating your fellow employees and others with respect and dignity, and thriving in a global workplace where all employees are valued.

Each of us plays an essential role in building and protecting our reputation and culture. What you do matters.

Let these resources guide you in the actions that you take on our company's behalf. Use good judgment and common sense. If you have a question, reach out for guidance from your manager, our Legal Department, our Ethics Office, Human Resources or Finance. If you suspect a violation, report it. Each of us is accountable for our own actions.

We can realize the need for speed and achieve results while maintaining the highest standards of ethics and integrity. It starts with each and every one of us doing the right thing every day. Please join me in continuing to make our company a place where we are proud to work.

Best,



Brian

President and Chief Executive Officer



INTRODUCTION

WHAT IS THIS CODE OF BUSINESS CONDUCT AND ETHICS?

Look at this Code as a collection of CDK fundamentals. Regardless of your background, culture, or local customs, these fundamentals provide a global foundation for acting with integrity. It's a guide to conducting ourselves with our colleagues, customers, vendors and suppliers—and with the rest of the world outside of CDK.

Each one of us must hold ourselves accountable, and set an example for others. When we act in a way that reflects the fundamentals described in this Code, we're helping protect our reputation and culture.

COMPLIANCE WITH THE LAW

As a publicly traded company committed to the highest ethical standards, we always comply with all applicable laws and regulations. If a law or regulation requires us to do something, we do it. If a law or regulation prohibits us from doing something, we don't do it. Simple as that. If you're not sure whether something is legal or whether a law or regulation applies to us or our actions, you can contact the CDK Legal Department

ADDITIONAL RESOURCES

This Code is not intended to address every potential situation that may arise. Rather, it identifies the fundamentals to help guide your decisions, and gives examples of how to do the right thing in certain circumstances.

If you don't understand the fundamentals contained within this Code, or are not sure how to apply them, help is available. You can seek guidance from:

- Your supervisor or manager
- The CDK Chief Ethics Officer at 847-485-4039
- The CDK Legal Department by email at ethics@cdk.com
- Or you can use the CDK Ethics Hotline:
 - In the United States by calling 1.800.461.9330
 - Outside the United States, by placing a reverse charge or collect call to +1.720.514.4400
 - Online at www.CDKGlobalEthics.com

OUR RESPONSIBILITIES

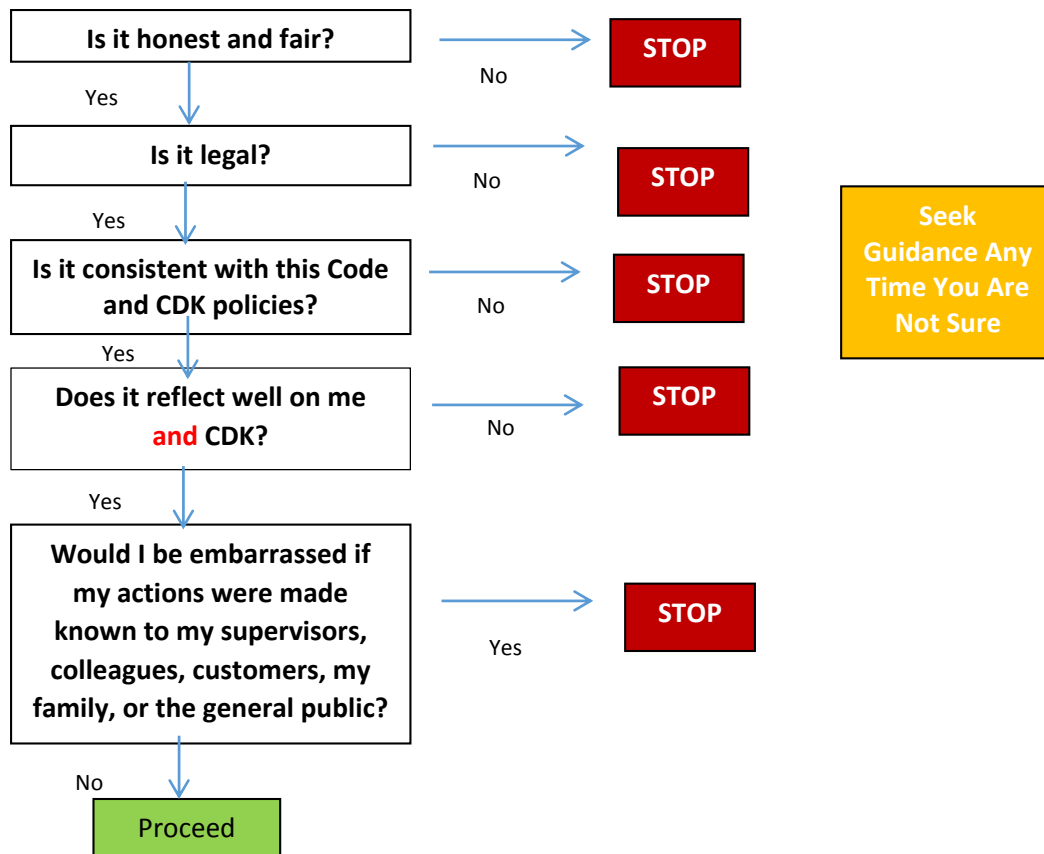
- Acting in Accordance with this Code
- Discipline
- Raising Concerns
- Investigations
- No Retaliation
- Waivers

ACTING IN ACCORDANCE WITH THIS CODE

This Code applies to all CDK directors, officers and employees.

Each of us has the following responsibilities:

- Always act with integrity
- Use good judgment and common sense
- Be straightforward and honor your commitments
- Treat others with respect and dignity
- Comply with this Code, CDK policies, and the law at all times regardless of local custom
- Ask for help if you have questions
- Take accountability for your actions
- Report anything that doesn't seem right
- Lead by example



DISCIPLINE

Compliance with this Code is essential to protecting the reputation and culture of CDK. Any employee who violates this Code will be subject to disciplinary action, up to and including termination.

RAISING CONCERNS

IF YOU SEE SOMETHING, SAY SOMETHING

We are all responsible for reinforcing and protecting the reputation of CDK and our compliance with laws and regulations. If we see something that does not look or feel right or that we think violates this Code, we have an obligation to report the issue promptly. We must report concerns whether we are involved in the activity, or the activity involves someone else who is subject to this Code, such as a manager or co-worker. We must all speak up if we make a mistake rather than covering it up. None of us can overlook violations of this Code just because the actions were directed by a supervisor, management or another person. It is up to all of us to bring concerns to the attention of CDK as soon as possible so that we can immediately investigate and correct any issues.

“It takes years to build a reputation and only a few seconds to ruin it.” – Warren Buffett

WATCHING OUT FOR YOUR WORKPLACE: HOW TO REPORT CONCERNS OR ASK QUESTIONS

If you are concerned about an actual or potential violation of this Code or have questions about how this Code applies, there are several ways to report your concerns or ask questions. You may contact:

- Your manager or supervisor
- The CDK Chief Ethics Officer at 847.475.4039
- The CDK Ethics and Compliance Office at ethics@cdk.com
- The CDK Legal Department
- The Audit Committee of the CDK Board of Directors by sending a detailed note, with relevant documents, to Audit Committee of CDK Global, 1950 Hassell Road, Hoffman Estates, IL 60169.
- In North America, the UK, India and anywhere permitted by local law, you can also report your concern to the CDK Ethics Hotline:
- In the United States call 1.800.461.9330 to report the issue with the help of a call center representative
- Outside the United States, place a reverse charge or collect call to +1.720.514.4400 to report the issue with the help of a call center representative and a language interpreter. Additional international dialing instructions can be displayed in your preferred language at www.cdkgloblethics.com
- Online at www.cdkgloblethics.com

The CDK Ethics Hotline is available 24 hours a day, 7 days a week. Where permitted by local law, you will be given the option to remain anonymous.

INVESTIGATIONS

CDK takes all reported ethical concerns seriously. We are committed to investigating all concerns in a fair, timely, thorough manner. Your cooperation in an investigation is essential to the ability of CDK to understand and correct any potential issues. As a CDK employee, you must cooperate with our investigations and answer all questions completely and truthfully.

We will keep your identity and the information that you provide in an investigation strictly confidential except as necessary to investigate and address any alleged violation and where disclosure is required by law. We will share information with only those who have a legitimate need to know, where required by law, and only to the extent necessary to effectively investigate and resolve the issue.

If CDK determines that this Code, CDK policy, or the law has been violated, appropriate corrective actions will be taken.

NO RETALIATION

We are counting on you to speak up so we can take action to prevent and correct suspected behavior.

We strictly prohibit any form of retaliation, including firing, transferring, demoting, passing over for a promotion, giving a negative performance evaluation, intimidating or harassing, or taking any other negative employment action against an employee for engaging in activity protected by CDK, this Code, CDK policy, and the law reporting a concern in good faith, or cooperating in an investigation. If you feel that you have been retaliated against, we encourage you to notify us immediately by any of the reporting methods set forth in this section of this Code, and we will promptly investigate your concern.

WAIVERS

We should comply with this Code at all times. We only grant waivers of this Code under limited circumstances. Only the CDK Audit Committee may waive a provision of this Code for a Board member, an executive officer, or the company's principal accounting officer or controller or persons serving in similar functions. We must promptly disclose such waivers as required by law. The General Counsel may waive a provision of this Code for anybody else subject to this Code. Contact the Chief Ethics Officer or email the Ethics and Compliance Office at ethics@cdk.com if you have a question about when a waiver is required or how to request a waiver.

RESPECT AND DIGNITY IN THE WORKPLACE

- No Harassment or Discrimination
- Workplace Safety
- Drugs and Alcohol

We make CDK what it is today and we are the key to the future of CDK. To be successful and make CDK a great place to work, we need to treat each other and all of those with whom we interact with respect and dignity. We have a responsibility to each other to act professionally at all times, even if we disagree.

Follow The Golden Rule – Treat Others the Way You Wish to be Treated.

RESPECT, ALWAYS. HARASSMENT OR DISCRIMINATION, NEVER.

At CDK, we pride ourselves on having a diverse workforce. We value and celebrate the uniqueness of individuals and the different perspectives they provide. We strive to build a culture that is inclusive and welcoming to all. We strive to create a positive and professional environment that allows and encourages everybody to be themselves and work together with their colleagues. So when it comes to protecting our employees' safety and well-being, we draw a firm line in the sand. We will not tolerate any form of harassment, bullying, abusive or intimidating conduct, or any other behavior that creates a hostile work environment. Whether we are at a CDK office, on the road traveling, or at business-related social events, it is our responsibility to help create a harassment-free zone. Harassment is unacceptable, regardless of the form the behavior takes or the medium used: physical, sexual, verbal, non-verbal, in person, over the phone, in a text, in a tweet, over the internet, or in social media— harassment of any kind is always unacceptable.

We want to quickly address any instances of harassment and discrimination. If you are the victim of harassment or discrimination, or if you become aware of such conduct, you have a responsibility to speak up. Report the conduct immediately to a manager or supervisor, your HRBP, the CDK Ethics Hotline, the CDK Ethics and Compliance Office via email (ethics@cdk.com), or CDK General Counsel.

Please consult the CDK Harassment Policy applicable to your location for additional guidance.

SAFETY FIRST!

WORKPLACE SAFETY

Every employee has the right to feel safe and secure in the workplace. And we all have a role in creating and maintaining a safe and secure environment. Be aware of our surroundings, and follow all posted safety procedures. Report injuries and unsafe working conditions to a manager or your HRBP immediately. For your protection and others', always direct un-badged or unknown individuals to enter the building through the main entrance, where employee and visitor controls will be implemented.

We do not tolerate workplace violence. Physical and verbal acts or threats of violence, whether made seriously or in jest, to an employee or anybody else, are never acceptable. If you feel or see an immediate threat of physical harm, contact the CDK Global Security Organization, the local police department, or both immediately.

Please consult the CDK Workplace Violence Policy applicable to your location for additional information.

LET'S ALL BE SMART ABOUT DRUGS AND ALCOHOL

When employees are under the influence of alcohol or illegal drugs, it can create a serious health or safety risk. It can also negatively impact the job performance and productivity of employees.

CDK maintains a drug-free and alcohol-free workplace. While on CDK property or conducting CDK business, we are strictly prohibited from using, possessing, manufacturing, distributing, dispensing, purchasing, selling, and being under the influence of illegal drugs or alcohol. However, we may consume alcoholic beverages when served from time to time at CDK-sponsored or business-related events. We are expected to drink responsibly on these occasions.

Help is available through the CDK Employee Assistance Program if you need assistance with a drug or alcohol problem. To learn more, please contact your HRBP.

Please consult the CDK Drug and Alcohol Policies applicable to your location for further information.

KEEPING OUR HOUSE CLEAN

- Accurate Records
- Records Retention
- Company Assets and Information
- Confidential Information
- Data Privacy
- Insider Trading
- Conflicts of Interest
- Loans

ACCURATE RECORDS

Honest and accurate records are critical for making sound business decisions, complying with applicable legal requirements, reporting to government agencies, and upholding the reputation and credibility of CDK. That's why we strive to keep good records. And we never falsify, forge, or improperly alter Company documents. This includes business and financial records, such as company books, records, accounts and financial statements. It also includes employee records such as your time cards, expense reports and benefit claim forms.

We are responsible for keeping accurate business and financial records. So always remember to:

- Be familiar with any legal or regulatory requirements and internal controls that apply in your area
- Accurately record all transactions with sufficient detail, in the proper account, in the proper accounting period, and in accordance with all legal requirements and CDK internal controls
- Ensure that all documents are properly dated

We recognize that mistakes sometimes happen. Nobody is perfect. The important thing is to ensure that the matter is identified and addressed appropriately as soon as possible. If you become aware of a mistake or inaccurate records, tell somebody immediately. You should speak to your manager, or you can use any of the means set out the Raising Concerns section of this Code.

RECORDS RETENTION

CDK is required to maintain records for a number of reasons, including business, legal and regulatory requirements. The CDK Record Management and Retention Policy and retention schedules, and any specific retention policies relating to our business units, were developed to ensure that CDK complies with these requirements.

From time to time, the CDK Legal Department may issue a Legal Hold Notice. A Legal Hold Notice is a memorandum issued by the CDK Legal Department when CDK has been sued or reasonably anticipates that it will be sued instructing the recipient (a) to suspend the routine destruction of (pursuant to the CDK Document Retention Policy), and (b) not to modify, alter, dispose of, delete, or destroy, any records (electronic or hard copy) that are described in the Legal Hold Notice as potentially relevant to the lawsuit until otherwise notified by the Legal Department. This generally occurs when litigation is pending or threatened against CDK or if there is a government investigation. When we receive such notices we DO NOT modify, alter, dispose of, destroy, or delete any records (electronic or hard copy) that are described in the Legal Hold Notice until we are told that it is okay to do so by the Legal Department. This is true even if

the records were scheduled to be disposed of under the CDK Records Management and Retention Policy or your business unit's retention schedule.

We all must do our part. This means that we:

- Keep all records for the period of time specified in the CDK Record Retention Policy
- Preserve all records that are subject to a Legal Hold Notice
- Securely dispose of all records that are no longer needed after the retention period has expired and only if the record is not required to be preserved under a Legal Hold Notice

For more information on the CDK Record Management and Retention Policy and the retention schedules – [link to policy](#)

COMPANY ASSETS AND INFORMATION

Every day, we are entrusted with valuable CDK assets. These assets can take various forms:

- Physical – equipment, supplies, company vehicles
- Technology – computer systems and software, telephones and smartphones, tablets, information systems (including voicemail, email, text messaging, instant messaging, intranet and internet websites)
- Financial – money, securities, purchasing cards, credit cards
- Intellectual Property – inventions, patents, trade secrets, trademarks, copyrighted materials
- Other sensitive information – confidential information, non-public information

We have a responsibility to protect these assets and use them properly.

USE OF CDK ASSETS

CDK provides us with these important assets so that we can perform our jobs and achieve our business goals. It is important that we use these assets for the conduct of CDK business and not for our personal activities or benefits.

USING ELECTRONIC COMMUNICATION SYSTEMS RESPONSIBLY

Electronic communication systems, whether used inside or outside the workplace, are essential business tools. We understand that the information that we create, send, download, and store on CDK electronic communication systems is the property of CDK. We recognize that CDK has the right to monitor the use of CDK electronic communication systems to ensure compliance with this Code, CDK policies, and the law, and CDK may access information stored on CDK electronic communications systems for any legitimate business purpose, subject to applicable law.

We never use CDK electronic systems for illegal purposes or improper purposes, such as accessing or posting material that is pornographic, obscene, hostile or otherwise offensive or

violates this Code or Company policies. CDK provides additional information in our Acceptable Use of Electronic Communications and Computer Hardware and Software policies.

PROTECTING CDK IT ASSETS AND ELECTRONIC COMMUNICATION SYSTEMS

Cyber threats are everywhere. That's why we all need to be diligent guardians of CDK hardware, software, and electronic communication systems. It's vital that we're all vigilant and use common sense. You can help safeguard CDK hardware, software, and electronic communication systems by:

- Keeping hardware and mobile devices secure at all times
- Only copying, installing, or using properly authorized and licensed software, applications, or hardware on your CDK-issued systems
- Contacting the CDK Global Security Organization before opening suspicious email and email attachments from unknown senders
- Changing your passwords regularly and not sharing them with others
- Reporting any suspicious activity to the Business Security Officer

THEFT OF COMPANY ASSETS

We respect what is not ours. Stealing is always wrong. We do not tolerate theft of any kind, whether it is physical theft of CDK property or information, fraud against CDK, embezzlement of funds, intentional misreporting of time or expenses, or theft of another person's property and things.

CONFIDENTIAL INFORMATION

Information is the lifeblood of our company. Safeguarding confidential information is critical to our success, and it is a responsibility that we all share. In the course of our employment, we will have access to CDK confidential information and the confidential information of others, such as our customers and vendors. Confidential information is any information that is not publicly available, for example:

- CDK research and development activities
- Software and software codes
- Strategic and business plans
- Pricing
- Business proposals
- Contract terms
- Financial data
- Customer and vendor information

Our confidential information gives us a competitive advantage in the market. And protecting the confidential information of our customers and vendors is essential to preserving our reputation as a trusted business partner. There are a number of steps we must take to safeguard confidential information, including:

- Only provide confidential information to those in CDK with a need to know
- Enter into a non-disclosure agreement approved by the CDK Legal Department before exchanging confidential information
- Obtain written consent prior to disclosing customer or vendor confidential information
- Store confidential information securely, whether hard copy or electronic
- Limit access to computers and electronic media. We keep our computers and mobile devices in our possession and lock them when not in use; avoid using them in public places where others might see our screen; and require passwords for access.
- Use only secure methods to transmit confidential information
- Dispose of or destroy information using secure methods

For more information on safeguarding confidential information, CDK has developed an Information Security Responsibilities Policy.

DATA PRIVACY: IT'S A MATTER OF TRUST

Our employees, customers, and business partners entrust us with sensitive information, including Personal Information, which consists of any information that (alone or when used in combination with other information within the direct control of CDK) can be used to identify, locate or contact an individual. We value their trust and understand the importance of safeguarding this information. We always handle Personal Information with discretion and care by doing the following:

- Collecting and using data only for legitimate business purposes
- Complying with all applicable data protection laws and contractual provisions
- Limiting access to only those who have a legitimate business need to see the information
- Taking necessary precautions to prevent unauthorized disclosure

For more information on Data Privacy, see the Global Privacy Policy.

INSIDER TRADING

CDK employees may have access to material non-public information about CDK, which is information that is not generally known to the public and that a reasonable investor would consider important in making a decision to buy, sell or hold stock or other securities. We do not exploit this information for personal gain, and we take care not to disclose it to others who may use it for their personal gain.

As CDK employees:

- We cannot purchase or sell CDK securities while in possession of material non-public information.

- We cannot give material non-public information to others (including family members and friends) who buy or sell CDK securities while aware of that information. This is considered “tipping,” and results in insider trading violations by both the tipper and the recipient of the tip.

Violating the insider trading laws can result in severe civil and criminal penalties for our employees and for CDK.

If you are uncertain whether you are in possession of material non-public information or have further questions about the insider trading laws, you can contact the Legal Department.

For more information about Insider Trading, see the CDK Insider Trading Policy.

CONFLICTS OF INTEREST

When we are working for or on behalf of CDK, it’s imperative to always act in the best interest of the company. Be sure to exercise good business judgment and common sense. Make objective and impartial decisions. And do not put personal interests and relationships ahead of the Company. We should never exploit our position within CDK for personal gain.

Sometimes the appearance of a conflict of interest can be as harmful as an actual conflict. That’s why we must strive to avoid any activities that give even the appearance that we are putting our own interests ahead of that of CDK. The appearance of a conflict of interest — whether there is an actual conflict or not — can undermine confidence in our company’s integrity and reputation.

Conflicts of interests can arise in many situations. Some of the most common ones are highlighted below. If you are unsure whether something is a conflict, disclose it. We may be able to help you take steps to minimize any risks.

FRIENDS AND FAMILY

We value personal relationships, and we respect our employees’ right to keep their personal relationships private. We also recognize the potential for conflicts of interest they may create. That’s why we all must:

- disclose personal relationships when hiring, engaging, or entering into a business transaction with a friend or family member, and we recuse ourselves from the decision-making process
- disclose personal relationships when doing business with a company that employs a close friend or family member
- disclose personal relationships in the office and recognize that CDK may take appropriate action by reassigning individuals or taking other steps to ensure a positive and harmonious work environment.

OUTSIDE ACTIVITIES

We encourage employees to pursue interests outside of CDK. We want our employees to be well-rounded and engage in activities that fulfill them. If you think an activity that you are involved in may appear to be or cause a conflict of interest, be proactive in disclosing your involvement and seeking approval where required.

OUTSIDE EMPLOYMENT

Holding a job outside of CDK may be permitted if outside employment does not interfere with your ability to perform your job at CDK, and does not compete with CDK business. You must obtain appropriate prior written approval from your manager and the Ethics & Compliance Office before beginning any outside employment.

EXTERNAL BOARDS OF DIRECTORS

Serving as a member of the board of directors or a committee of a board of directors of another for-profit company could violate the conflicts of interest provisions of this Code or the Anti-Bribery and Corruption Policy. Directors must comply with the Corporate Governance Guidelines, and all others must obtain appropriate prior written approval from the General Counsel before beginning service. CDK employees may serve on the board of a non-profit, or educational or residential board if their activities do not conflict with CDK business—without seeking prior written approval.

OUTSIDE INVESTMENTS AND BUSINESS RELATIONSHIPS

We respect your freedom to handle your finances and enter into business ventures that do not conflict or interfere with CDK business. When making decisions on behalf of CDK, we should all consider what is best for the company, rather than the decision's effect on our outside investments and outside business relationships.

It's also important to disclose if you have more than a modest financial investment in a company that is doing business with CDK (including CDK customers, suppliers, and vendors), and (a) you recognize that you may need to divest your interests if they cause even the appearance of a conflict of interest, and (b) you must recuse yourself from any decision-making involving such companies. Employees must also disclose if they have a financial investment in or relationship with a competitor of CDK.

LOANS

Employees receive their paychecks on a payroll schedule determined by CDK. Except where required by law, CDK does not provide, facilitate, approve, request, or accept loans or payroll advances.

ACTING WITH INTEGRITY TO THOSE OUTSIDE OF CDK

- Bribery and Corruption
- Truthful Disclosures
- Gifts, Meals and Entertainment
- Governments
- Competitors
- Customers, Suppliers, and Vendors
- Human Rights and Ethical Labor Practices
- Community
- Protecting Intellectual Property
- Social Media

Integrity is everything. And we strive to conduct our business with the highest level of integrity. We are a global company with customers and operations all over the world. We respect our differences, and each country's customs and business practices. We always win business fairly by offering superior products and delivering value and excellent service to our customers—not by purchasing favors or deception. We always comply with each country's laws and regulations.

We do the right thing!

BRIBERY AND CORRUPTION

We succeed on our own merits, and not on the basis of bribery and illegal payments.

We never bribe, promise, offer, or give (directly or through a third party) anything of value to anybody for the purpose of improperly influencing any decision to get or keep business or to secure any improper advantage for CDK even if refusing to pay means losing business. This includes small bribes or facilitation payments (payments made to induce somebody, frequently a government official, to perform or expedite a routine duty or function), even if such payments are considered customary in a geographic location or industry. Things of value include:

- cash or cash equivalents (including checks, money orders, securities, gift certificates, gift cards and prepaid store cards)
- gifts
- meals
- entertainment
- travel and related expenses
- tuition
- promises of future employment
- charitable donations

We always want to know who we are doing business with, and therefore, we must follow our Finance and Procurement process to vet the third parties before entering into a relationship.

Bribery of governmental officials is especially serious. It is illegal in almost every country, and can have serious consequences for our employees individually, and for CDK, including financial and criminal penalties. In addition, many countries have laws which strictly prohibit bribing governmental officials in other countries. Government officials include:

- Officers and employees of any government, department, agency, bureau, authority, or instrumentality and their spouses and family members
- Anyone acting in an official capacity on behalf of a government
- Employees of government owned or controlled entities
- Candidates for political office
- International organizations or similar departments or agencies (e.g., the World Bank, IMF, etc.) and their personnel

TRUTHFUL DISCLOSURES

We prepare full, fair, accurate, timely, and understandable reports to all regulatory authorities, including the U.S. Securities and Exchange Commission, in accordance with U.S. Generally Accepted Accounting Principles and other financial statement requirements.

GIFTS, MEALS, AND ENTERTAINMENT

We are committed to building strong relationships with our customers, vendors, suppliers, and other business partners. In the course of doing business, it is customary to sometimes exchange modest gifts or provide meals and entertainment to show appreciation to existing business partners or establish cordial business relations. We permit this within the limits and parameters set out in the CDK Anti-Bribery & Corruption Policy. But we never allow gifts, meals, or entertainment to influence our ability to make objective business decisions in the best interest of CDK. Nor do we use gifts, meals, or entertainment to improperly influence those with whom we do business.

It is generally okay to accept or incur reasonable expenses for gift, meals, and entertainment as long as such expenditures:

- have a legitimate business purpose
- do not violate any applicable laws or the recipient's policies
- are not excessive in value
- are not intended to improperly influence the recipient's decision-making
- are given infrequently

Depending upon the amounts and circumstances, written pre-approval may be required before giving and receiving / accepting gifts. For guidance on how to execute the pre-approval process, contact antibribery@cdk.com

Employees must never give or receive cash or cash equivalent payments, such as gift cards – no exceptions.

Special rules apply when dealing with governments, quasi-government entities or government officials, and gifts and entertainment for government officials are permitted only under limited circumstances. For additional information about the rules for giving and receiving gifts, meals, and entertainment, including the acceptable amounts of each, CDK has published an Anti-Bribery & Corruption Policy, Anti-Bribery & Corruption Compliance Guide, CDK Anti-Bribery Request Form and Global Supplier Code of Business Conduct and Ethics. Please refer to those documents for more details.

Contact the Chief Ethics Officer, or contact the CDK Ethics & Compliance office by emailing ethics@cdk.com immediately if you need guidance or if you are asked to make a bribe, become aware of an improper payment, or suspect that something isn't right. Please refer to the CDK Anti-Bribery & Corruption Policy and Anti-Bribery and Corruption Compliance Guide for more information

GOVERNMENTS

LOBBYING

From time to time, CDK engages with lawmakers and government agencies regarding policies and legislation that may affect CDK business. When we do so, we comply with all applicable laws.

Lobbying is strictly regulated in many countries. If we need to meet with any lawmakers or governmental or regulatory officials to discuss CDK business or the laws that affect our business, or if we wish to engage in any other activities that could be considered lobbying, we must first contact the CDK Legal Department.

POLITICAL ACTIVITIES AND CONTRIBUTIONS

We encourage our employees to participate in the political process, and we respect everybody's views and opinions, even if we do not share them.

As individuals, we have the right to participate in political activities and make political contributions to the causes and candidates that we support. Political contributions may include attendance, participation and/or sponsorship of political candidates, parties, campaigns and related events. We recognize that using CDK corporate resources for political activities and contributions could be considered a corporate donation. When you engage in political activities, you must do so on your own time, and using your own resources, such as telephones, email, stationary, and office supplies. Employees must not use CDK resources for political campaigns or fundraising. When employees make political contributions, we must do it in our own name, using our own money and not CDK money, and in compliance with all applicable laws. CDK will not reimburse employees for their own political contributions.

When expressing our political opinions to third parties, employees must ensure make clear that their views are their own, and do not represent the views of CDK.

TRADE COMPLIANCE

Many countries have laws that restrict the export or import of certain goods and technologies to other countries, entities, or individuals. Many countries have also imposed trade sanctions and embargoes against other countries, entities, or individuals. In addition, the U.S. has adopted laws prohibiting businesses from cooperating with illegal foreign boycotts of countries that are friendly to the U.S. We must always comply with the law, and we must be careful when doing business or sending things across borders.

If you need assistance with foreign trade issues and understanding these complex laws, please contact the CDK Legal Department.

COMPETITORS

We are tough competitors, but we always compete fairly and honestly, and in compliance with applicable laws.

ANTITRUST AND FAIR COMPETITION

Competition laws, which are called “antitrust” laws in the United States, are designed to ensure that businesses compete fairly and honestly. They prohibit conduct seeking to reduce or restrain competition.

We comply with all antitrust and competition laws, and we avoid all actions that give even the appearance of wrongdoing. We must be careful when we speak with our competitors. And we must not discuss or reach agreements with our competitors to:

- Set, raise or lower prices
- Divide or allocate customers, territories, or markets
- Hire or not hire employees
- Fix employee wages
- Boycott customers, suppliers, vendors, or
- Limit competition in any other manner

If you have any questions about the laws or whether certain conduct would violate these laws, contact the Legal Department for assistance.

COMPETITIVE INTELLIGENCE

We gather information about our competitors and their business so that we can be more effective in our own business. We do so honestly and ethically, by accessing publicly available information such as annual reports, company web sites and publications, public presentations and public marketing documents, journal and magazine articles, stockbroker analyses, advertisements and other public media filings and offerings.

CDK never uses any type of ruse, scheme, misrepresentation, or deception to obtain information about our competitors, and we never seek out, accept, or use our competitors’ confidential and proprietary information.

From time to time we may hire employees from our competitors. When we do, we never ask them to violate any nondisclosure agreement, nor do we ask them, either in job interviews or once they have started at CDK, to disclose confidential information about their employer or former employer.

CUSTOMERS, SUPPLIERS AND VENDORS

Our business is a relationship business. The success of CDK is based on its ability to build and maintain long-term relationships with its customers, vendors, and suppliers. The foundation of our relationships is trust. We must do everything we can to earn and retain that trust. We show that we value our customers, vendors, and suppliers by:

- Treating them with respect
- Being straightforward in our business dealings
- Never misrepresenting our products and their capabilities

- Never using unfair, deceptive, or misleading business practices
- Safeguarding their confidential, trade secret, and personal information
- Honoring our commitments

We win doing business the right way, all of the time.

HUMAN RIGHTS AND ETHICAL LABOR PRACTICES

CDK is dedicated to supporting human rights and ethical labor practices across our supply chain and in our business activities throughout the world. We do not participate in or tolerate the deprivation of a person's liberty for commercial gain, including slavery, servitude, forced and compulsory labor and human trafficking. We are committed to ensuring that human trafficking is not taking place within our business.

COMMUNITY

We recognize the importance that businesses play in their local communities, and we take pride in giving back to the communities in which we do business. We organize a number of volunteer and community service events throughout the world and support worthy charitable causes. We believe that we can all make a difference in this world, and we strongly encourage our employees to support and be involved in their communities.

CHARITABLE CONTRIBUTIONS

There are many deserving charitable and nonprofit organizations, and we encourage you to donate to the charities that mean something to you.

At the same time, we must be more careful when we are requested to make charitable contributions by our customers, vendors, suppliers, and business partners, or when we make charitable contributions in any form (e.g., donation of corporate funds, use of company property) on behalf of CDK. Always be sure to obtain written pre-approval of the Anti-Bribery Committee before making any charitable contributions on behalf of CDK.

VOLUNTEERING

We believe in getting out into the community and donating our time in helpful ways. We provide opportunities for our employees to volunteer their time during work hours, whether at CDK-sponsored community service activities or for volunteer activities of their own choosing. We allow paid time off up to a certain number of hours so that employees may participate in community service activities, with prior management approval. Please consult the applicable Volunteer Paid Time-Off Policy for further details.

PROTECTING INTELLECTUAL PROPERTY

Just as we protect our own confidential ideas, processes, software, trademarks, copyrights, patents, and other intellectual property (defined as any product of human intellect that the law protects from unauthorized use by others, including patents, copyrights, trade secrets and

trademarks), we respect the intellectual property of others. We all must work to avoid infringing on the intellectual property rights of others. We also obtain (through the Procurement Organization and Legal Department) licenses for all third-party software and authorization before downloading and distributing software to CDK employees and CDK customers. And we honor our software license agreements and the restrictions on the disclosure, use, and copying associated with the use of such software.

BEING SMART ON SOCIAL MEDIA

Social media is a great way for people to connect and interact personally and professionally. Social media can be a fun and valuable business tool, and we encourage employees to use it as a way to connect, support sales, and communicate our brand messaging—both during and after work hours. We know that in the world of social media, the lines between what is public, private, personal, and professional are blurred. Whether you are using social media for your own personal use, such as on a personal web page, in a blog, or on a chat forum, or on behalf of CDK, keep the following guidelines in mind when discussing CDK:

- Use your best judgment
- Speak only about what you know
- Unless you are specifically authorized to speak on behalf of CDK, you must be clear that the views expressed are your own
- Be respectful of others
- Be mindful — do not disclose confidential information, trade secrets, or employee or customer personal information
- If you make a mistake, be honest and fix it as soon as possible

Additional details about using social media can be found in the CDK Social Media Policy and Guidelines.

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