CALIFORNIA TRANSPARENCY IN SUPPLY CHAIN ACT OF 2010
DISCLOSURE STATEMENT

AUTOZONE FOREIGN SOURCED PRODUCTS: AutoZone has Global Sourcing Principles that apply to all direct import vendors. Under these principles, AutoZone vendors are required to

- comply fully with all applicable local and international laws and regulations,
- be socially and environmentally compliant in all countries and communities in which they do business, and
- deploy expected security controls and procedures.

AutoZone requires its vendors for all its purchased products to comply with the legal maximum working hours as specified by localities and a country’s standards and laws. AutoZone also requires its vendors to employ workers in compliance with local labor laws, including but not limited to legal employment age regulations. In no case does AutoZone knowingly procure goods or services from factories employing workers under the legal minimum age. AutoZone encourages vendors to be proactive in contributing to the continued education and betterment of their employees. AutoZone requires its vendors to provide products that have not been produced using forced labor. Forced labor includes, but is not limited to, all forms of slavery or practices similar to slavery, bonded labor, involuntary labor resulting from trafficking, and labor subject to arbitrary abuse.

AutoZone expects its supply chain network to be security compliant. Our vendors are expected to meet or exceed industry standards and comply with policies related to container security, access and loading processes, seal management, and human resources practices, and such other security standards as AutoZone may direct from time to time. AutoZone does not allow illegal payments to any person, organization, or government. Vendors must not give funds, property, services or labor, directly or indirectly, to anyone in order to obtain business or any special or unusual treatment for AutoZone. This includes vendors and their agents, representatives, employees, officers and directors, and U.S. or foreign officials or agents.

AUTOZONE DOMESTIC SOURCED PRODUCTS: AutoZone’s vendors are required to comply fully with all applicable local and international laws and regulations. AutoZone requires its vendors to provide products that have not been produced using forced labor. Forced labor includes, but is not limited to, all forms of slavery or practices similar to slavery, bonded labor, involuntary labor resulting from trafficking, and labor subject to arbitrary abuse.

ALL AUTOZONE VENDORS: AutoZone requires a Vendor Agreement for all of its vendors—foreign and domestic. This agreement states that the vendor will indemnify AutoZone if it does not comply fully with all applicable local and international laws and regulations.

AUTOZONE DISTRIBUTION CENTERS: AutoZone expects all loads coming into its distribution centers to be sealed by the vendors according to AutoZone’s security procedures. AutoZone has policies and procedures in place for the inspection of any loads arriving with seal discrepancies. Internally, AutoZone inspects, secures, and seals all of its trailers between its distribution centers, vendors, stores and other third parties. Each distribution center is fenced and access controlled. Further, each distribution center has closed circuit television as well as a
security guard on duty at all times. AutoZone operates its own fleet, excluding its Ontario, California distribution center.

**ALLDATA:** AutoZone, Inc. is the parent company of ALLDATA LLC. ALLDATA LLC adheres to the same standards as AutoZone; however, ALLDATA does not receive containers, and within the United States, it delivers a majority of its database software products over the Internet and ships a small percentage of its database software products in disc format via the United States Postal Service. In its Vendor Agreement, ALLDATA requires its vendors to agree to take measures to ensure the physical integrity and security of all shipments against the unauthorized introduction of unauthorized personnel in transportation conveyances or containers. Additionally, ALLDATA requires each vendor to indemnify ALLDATA if it does not comply fully with all applicable local and international laws and regulations.

**VERIFICATIONS:** AutoZone verifies that each foreign sourced product vendor complies with its Global Sourcing Principles via third party audits, including workplace conditions assessments performed before the first order and annually (with notice periods ranging from no notice to one week) as well as global security verifications performed every eighteen (18) to twenty-four (24) months. Global security verifications are based on Customs-Trade Partnership Against Terrorism (C-TPAT) requirements. AutoZone does not perform third party factory assessments for its domestic vendors; however AutoZone regularly visits its domestic sourced products vendors’ facilities.

**AUDITS:** AutoZone confirms that each of its foreign sourced product vendors complies with its Global Sourcing Principles via third party audits, including workplace conditions assessments performed before the first order and annually (with notice periods ranging from no notice to one week) as well as global security verifications performed every eighteen (18) to twenty-four (24) months. Global security verifications are based on Customs-Trade Partnership Against Terrorism (C-TPAT) requirements. AutoZone does not perform third party factory assessments for its domestic vendors; however AutoZone regularly visits its domestic sourced products vendors’ facilities.

**CERTIFICATIONS:** AutoZone does not require its vendors to provide any certifications regarding compliance with anti-slavery/human trafficking laws. However, each vendor and supplier is required under the principles and/or its vendor or supply agreement to comply with all applicable laws and regulations.

**ACCOUNTABILITY:** AutoZone holds its employees accountable through several company policies, including its Employee Handbook and Code of Conduct, Global Sourcing Principles, and Global Compliance Policy. ALLDATA holds its employees accountable through several company policies, including its Employee Handbook and Code of Conduct, Global Sourcing Principles, and Global Compliance.

**TRAINING:** AutoZone is in the process of creating awareness training for its employees on anti-slavery/human trafficking, particularly with respect to mitigating risks within the supply chains of products.