



# Code of Ethics 2024

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## Message From the Chief Executive Officer and President

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Dear SMP Colleagues,

SMP was founded on the values of ethics, integrity, common decency and respect for others. Since 1919, we have worked hard to uphold these values and earn the trust of our stakeholders – our customers, suppliers, vendors, employees, shareholders, and communities in which we conduct business. Every SMP employee can be proud of how we operate our company and what our company has achieved since our founding. However, we cannot just rely on past actions. Our continued success depends on each of us remaining committed to these values in everything that we do and in all of our actions, regardless of business pressures.

Taking this into account, SMP's Code of Ethics was developed to outline the values and behaviors by which we expect all directors, officers and employees in the U.S. and globally to adhere. The Code of Ethics covers a range of subjects, from the use of corporate funds, to conflicts of interest, and the protection of company assets. However, the Code of Ethics does not cover every situation that you may encounter; good business judgment must be exercised.

Please read the Code of Ethics carefully and take personal responsibility for following our values. If you have any questions regarding the Code of Ethics, ask your manager, your local HR representative, the Chief Legal Officer or me.

You should note that we will not tolerate violations of the Code of Ethics. If you become aware of an issue or have any concerns, you can make a report anonymously through one of our reporting channels, which are all available 24 hours a day, 7 days a week. We're committed to a work environment of open communication that supports our employees in reporting potential violations. If you make a report in good faith, you will be protected from retaliation.

Thank you for your continued dedication to SMP and for your commitment to upholding the values set forth in our Code of Ethics.

**Eric P. Sills**

Chief Executive Officer and President

# Introduction to Our Code of Ethics



## What is Our Code of Ethics?

Our Code is a statement of principles that guides our decision-making and reinforces our commitment to the highest level of ethical and legal conduct in all aspects of our business. Our Code strengthens and protects our most important assets – our people and our culture, by unifying us in the ways in which we achieve our business goals.

Our Code is meant to be read in conjunction with our Corporate Sustainability Report, which elaborates on our ethical commitments pertaining to environmental, social, and governance (“ESG”) and our progress in these areas. You can view our Corporate Sustainability Report on our website at: <https://www.smpcorp.com/en/sustainability/esg-reports>.

## Who Does Our Code of Ethics Apply to?

All of our employees, officers and directors are responsible for adhering to our Code. Each one of us — our sales force, our engineers, our product specialists, our accountants, our managers, our executives – has a duty to uphold our Code.

We also believe that our suppliers, contractors, agents and other business partners should adhere to the principles of ethical and legal conduct embodied in our Code. We will seek to establish and maintain mutually beneficial, long-term relationships with business partners who demonstrate a commitment to these principles.

For the purposes of the Code, the terms “Company” and “SMP” include all divisions and wholly-owned entities of Standard Motor Products, Inc.

# How Do I Live Up to Our Code of Ethics?

All of us are expected to carefully read, understand and abide by the principles of ethical and legal conduct embodied in our Code. In particular, we are each required to:

## Periodically familiarize ourselves with our policies and the laws and regulations that apply to our jobs

Our policies are designed to ensure our compliance with complex laws and regulations that are subject to change from time to time. Accordingly, we are responsible for having current knowledge of Company policies. We are also responsible for having a basic understanding of the ways in which laws and regulations impact our particular job functions. Periodically familiarize ourselves with our policies and the laws and regulations that apply to our jobs.

## Seek guidance if we are unsure how to act

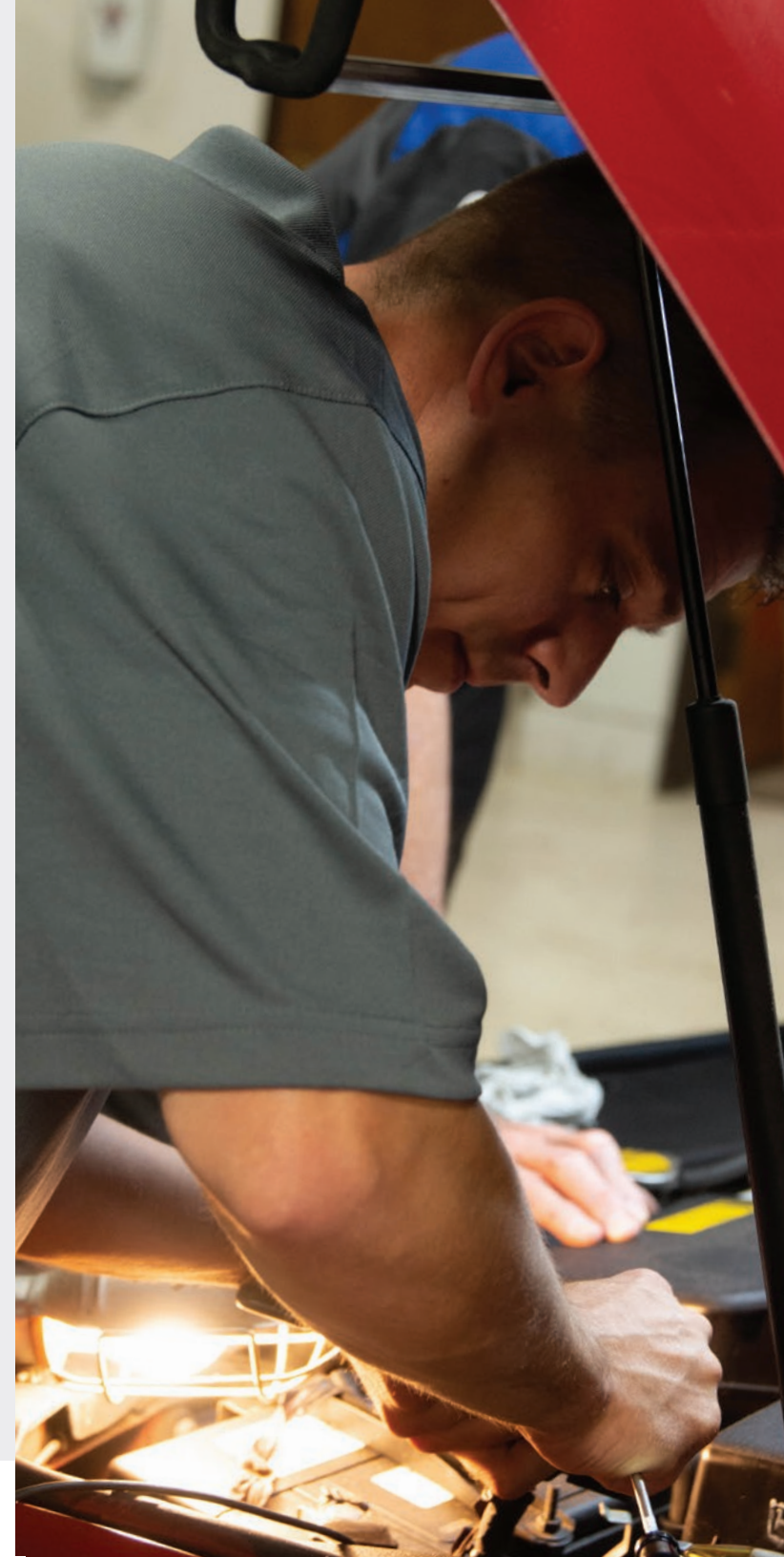
In performing our work, we are each responsible for acting ethically and in accordance with the law. If you have a question about any aspect of our policies or about how any law or regulation relates to your particular job functions, it is your responsibility to contact your manager, a Human Resources manager or the Legal Department for guidance. You are not expected to be a subject matter expert, but you are expected to know when to seek advice.

## Report concerns or any violations of our Code or policies without fear of retaliation

We are all expected to be active participants in upholding the principles of ethical and legal conduct embodied in our Code. If you believe that a violation has occurred, you are required to immediately report the violation to your manager, a Human Resources manager or the Legal Department. See page 24 of this Code for more information on how to report a concern.

If you are concerned that a violation may have occurred, you are strongly encouraged to report the incident in the same manner. We cannot achieve our commitment to conducting business at the highest level of ethical and legal conduct without your help. To achieve this goal, we need you to voice genuinely held concerns. We will not tolerate acts of retaliation against anyone who believes that a violation of the Code or any other Company policy has occurred, and who makes a good faith report to the Company.

If you are responsible for managing others, you have a few additional responsibilities. You are expected to ensure that the employees who report to you understand the principles of ethical and legal conduct embodied in our Code and in our policies, and to create a positive work environment that encourages employees to seek guidance and report concerns without fear of retaliation.





# Our Commitment to Our Company

## What Would You Do



Tim is responsible for selecting outside firms to print marketing materials for the Company. The sales representative from a firm that Tim recently hired, contacted Tim to see if he would be interested in going to a professional basketball game with the representative for free.

### ***Should Tim accept the offer?***

Tim should speak with his manager, a Human Resources manager or the Legal Department before accepting the gift. While attending a sporting event is a good way to build business relationships, the cost of the ticket is likely expensive. Such an expensive gift could affect (or appear to affect) Tim's ability to make a sound, objective business decision when evaluating the firm's future bids on projects.

## Avoiding Conflicts of Interest

In performing our work, we are responsible for acting in the best interest of our Company. A conflict of interest arises when our personal or family interests interfere with our ability to make sound, objective business decisions that are in the best interest of our Company. Accordingly, we are responsible for avoiding these conflicts, but we must also avoid even the appearance of a conflict of interest.

If you believe that a conflict of interest has occurred or is likely to occur in the future, you have a duty to immediately report the matter to your manager, a Human Resources manager or the Legal Department. See page 24 of this code for more information on how to report a concern. Directors and executive officers must seek determinations and prior authorizations or approvals of potential conflicts of interest from the Governance Committee (with respect to directors) or the Audit Committee (with respect to executive officers).

Conflicts of interest come in many different forms, and although it is impracticable to list them all, the following examples are a few of the more common situations in which conflicts of interest are likely to occur.



## Giving and Accepting Gifts

Business gifts and entertainment are often used to build goodwill between our Company and those with whom we do business; however, a conflict of interest may arise if the gift or entertainment could affect, or appear to affect, our ability to make sound, objective business decisions. In general, none of us may give or receive a gift or entertainment if doing so could impair, or appear to impair, our ability to make fair and unbiased business decisions, or if the gift or entertainment exceeds a reasonable amount.

There are also strict laws that govern the giving of gifts and entertainment to government officials. For specific guidance on this topic, review the section titled Anti-Bribery and Anti-Corruption on page 23 of this Code or contact the Legal Department.

## Doing Business with or Supervising Friends or Family

A conflict of interest may arise out of our personal relationships, if those relationships could affect, or appear to affect, our ability to make sound, objective business decisions.

- A conflict of interest may occur where you have a direct or indirect reporting relationship with a member of your immediate family or household (meaning your spouse, domestic partner, parents, siblings, children, parents-in-law, brothers- and sisters-in-law, sons- and daughters-in-law, and anyone residing in your home).
- Likewise, a conflict of interest may occur where the Company does business with a member of your immediate family or household, or if a member of your immediate family or household is employed in a managerial position with a customer, supplier, contractor, agent or other business partner of the Company.

## Corporate Opportunities

Employees, officers and directors are prohibited from (a) taking for themselves personally opportunities that are discovered through the use of Company property, information or position; (b) using Company property, information, or position for personal gain; and/or (c) competing with the Company. Employees, officers and directors owe a duty to the company to advance its legitimate interests when the opportunity to do so arises.



## Outside Employment or Business Interests

A conflict of interest may occur if you accept employment with another employer or engage in business outside of the Company. In these situations, we must never:

- Use Company resources to perform work for another business, or allow the demands of outside employment to interfere with our responsibilities to the Company
- Accept employment with or engage in a business that sells products or services that compete with the products and services of the Company, or that are directed to the customers, suppliers, contractors, agents or other business partners of the Company.



## What Would You Do

Bernard, an assembler in our Greenville, South Carolina facility, recently took on a second job in an unrelated field that requires him to work through most weekends. Time spent at his second job does not overlap with his work for the Company, but he's concerned that his second job may conflict with his duties to the Company.

### *Should Bernard be concerned?*

Bernard very likely has nothing to worry about; however, if he is concerned that his actions violate Company policy, he should speak with his manager or a Human Resources manager to be certain. One of our biggest concerns in Bernard's case is making sure that he gets enough rest off the job, so that he is able to perform his work in a safe manner while on the job. Protecting the health and safety of our people is one of our most important goals. If you know of someone in Bernard's situation, you should encourage that person to talk to his or her manager or a Human Resources manager about the situation.

## What Would You Do



Stephanie, a member of Corporate Finance, regularly takes her Company laptop home at night in case she needs to access her files in an emergency. Over time, she has become accustomed to using the laptop to browse the Internet and access content for leisurely reading at home.

***Does Stephanie's use comply with Company policy?***

Yes, Stephanie's personal use of the laptop complies with Company policy because it is limited and does not interfere with her work. If Stephanie is not sure that her actions comply with Company policy, she should seek guidance from her manager, a Human Resources manager or the Legal Department. Always remember – when in doubt, ask before you act! Stephanie should also not have any expectation of privacy while using the laptop.

## Company Assets

### Physical Assets

Our Company derives significant value from its equipment, tools, machinery, inventories, and other tangible assets. To ensure that our Company continues to do so, we must all take great care to protect these assets against misuse, loss, theft or damage. We must also use these assets only to further the legitimate business interests of the Company, unless limited personal use is permitted by Company policy.

### Electronic Communications and Equipment

We are all responsible for using the Company's IT resources and communications systems in a safe, ethical and lawful manner, and in accordance with Company policy. This means that we must exercise good judgment when using this equipment, and recognize that while we are permitted to make limited personal use of this equipment, our personal use must never interfere with our work.

Examples of IT resources and communications systems:

- Computers, networks, telephones, email systems and accounts, Internet and intranet access, virtual meeting solutions, instant messaging services, printers, photocopiers, scanners, fax machines, and other electronic devices

We must also ensure that when we write emails and other electronic communications, we use the same professional style and tone as we use in other written correspondence. We must never use this equipment to intentionally access or transmit any communications or materials that may be construed by others as harassing or offensive based on race, religion, creed, national origin, ancestry, sex, gender, age, physical or mental disability, citizenship, genetic information, service in the uniformed services, or any other characteristic protected by law.

All contents of the Company's IT resources and communications systems are the property of the company. Therefore, you should not have any expectation of privacy when using any Company-issued equipment, such as computers, telephones and other electronic devices. The Company may also monitor the use of this equipment to ensure that it is used in accordance with Company policy. You should not use this equipment for any matter that you desire to be kept private or confidential from the Company.

For more information, see our: Information Technology Resources and Communication Systems Policy







## Confidential Information

During the course of our work, we may have access to confidential information about our Company. A few common examples of our Company's confidential information may include the price of our products, the terms of any discounts or credits that we may offer to customers, the technical designs and specifications of our products and the identity of our customers, suppliers and other business partners.

We each have an obligation to protect against the unauthorized access, use or disclosure of the Company's confidential information. Therefore, we may not discuss the Company's confidential information with anyone outside of the Company, unless we are authorized to do so. We must also refrain from discussing the Company's confidential information with any of our fellow employees, unless they have a business need to know the information. It is important to remember that our obligation to protect this information continues even after our employment with the Company ends.

If you have any question as to whether any particular information is confidential or whether any particular use or disclosure of information is unauthorized, it is your responsibility to contact your manager or the Legal Department for guidance.

For guidance on our duty to maintain the confidentiality of information belonging to our business partners, review the section titled Safeguarding Customer and Supplier Information on page 20 of this Code.







## What Would You Do

Bill, a purchasing manager, has had a rough week at work managing a situation with a supplier. The supplier possesses expensive tooling and equipment that is owned by the Company, and Bill knows that the supplier has been experiencing financial difficulties and may soon go out of business. While at dinner among friends, Bill considers venting to his friends about his situation at work.

*Is Bill permitted to discuss his situation with his friends?*

Bill may speak in general terms about his experiences at work, but he must be very careful not to reveal any confidential information. Certain information, like the identity of the supplier, and the fact that the supplier is experiencing financial difficulties and may soon go out of business, may constitute confidential information. We have a duty to protect confidential information that we learn through our work, whether it belongs to the Company or to our business partners. This duty prohibits us from disclosing the information to any person that is not authorized to receive it.

The fact that the supplier may go out of business and cease supplying the Company with its goods could also constitute material, non-public information. If Bill were to disclose that information to his friends, he and his friends could also be in violation of our insider trading policy or insider trading laws. For more information, see the section titled Complying with Insider Trading Laws on page 11 of this Code.



Alice received a litigation hold request from the Legal Department. The request asked her to submit to the Legal Department all of her email communications with a specific supplier who is believed to have sold the Company faulty parts. In one email, Alice lost her temper with the supplier and wrote some unprofessional things. She doesn't want her manager to see what she wrote, and she believes that the content of the email won't be helpful to the Company anyway, so she deletes the email before responding to the request.

### ***Has Alice complied with Company policy?***

Absolutely not. Alice has a duty to respond truthfully, accurately and completely to the litigation hold request. The communication at issue here is clearly within the scope of the hold; therefore, it is not appropriate for Alice to make her own determination that the communication is not relevant or helpful to the Company.

## Maintaining Complete and Accurate Books and Records

The accuracy and completeness of the Company's books and records are critical to effectively managing our business and ensuring our compliance with legal, regulatory and contractual obligations. Every one of us contributes in some way to creating and verifying the books and records of the Company, so every one of us has a duty to ensure that our contributions are timely, accurate fair, understandable and complete. To this end, each director, officer and employee who is involved in managing the Company's books and records, as well as the Company's periodic reports and other documents filed with the SEC, must fully cooperate with the Company's legal, accounting and internal audit departments, as well as the Company's independent public accountants and counsel.

### **Financial and Accounting Records**

Our financial and accounting records must fairly present in all material respects our Company's operations and financial condition. For those of us who are tasked with preparing our financial and accounting records, we are responsible for following our Corporate Accounting Guidelines, which are designed to achieve this goal by providing for the consistent application of United States Generally Accepted Accounting Principles ("U.S. GAAP") on a Company-wide basis. We are also responsible for following our disclosure control procedures and our internal control procedures, which are designed to provide reasonable assurance that our financial reports are prepared in accordance with U.S. GAAP.

If you believe that any of the situations listed below have occurred or are likely to occur in the future, you have a duty to immediately report the matter to the Legal Department. See page 24 of this Code for more information on how to report a concern.

- Any deficiency or weakness in the preparation or reporting of our financial information
- Any fraud that involves any employee who is responsible for the preparation or reporting of our financial information
- Any violation of any law, rule or regulation relating to the preparation or reporting of our financial information
- For more information, see our:
- Corporate Accounting Guidelines
- Internal Audit Charter

### **Business Records**

All records that are created or received in the normal course of business constitute the Company's business records. These records include any document or communication – emails, letters, memos, photographs, designs, drawings, specifications, charts, graphs, etc. – in any format, written or electronic. Our Company has established the Document Retention Policy to effectively and efficiently manage our storage, retrieval, use and disposal of these records to meet the goals described above. We are all responsible for being familiar with this policy and for ensuring that we follow its guidelines in the administration of our duties.

In particular, the policy addresses certain situations where we have a heightened duty to preserve business records. For example, if the Company anticipates becoming involved in an investigation or litigation a "litigation hold" may be initiated. Once initiated, a litigation hold requires all records that are relevant to the hold to be preserved until the hold is removed. Failure to adhere to this aspect of the policy could subject the Company and any individual who is responsible for disposing of the records to criminal or civil liability. If you have a question about this policy or whether records that you maintain are subject to a litigation hold, it is your responsibility to contact the Legal Department for guidance.

For more information, see our Document Retention Policy.

## Complying with Insider Trading Laws

We must not trade in the securities of the Company while in the possession of material, non-public information about the Company, which we obtained in the course of our work – a practice known as “insider trading.” In general terms, information concerning the Company is “material” if a reasonable investor would consider the information important in deciding to buy or sell securities of the Company, and information is “non-public” if it has not been disclosed to the general public and given adequate time to disseminate.

The following are examples of information that could be material to the Company:

- Financial results and projections
- Significant transactions, such as mergers or acquisitions
- The gain or loss of a significant customer or supplier
- Significant product announcements
- Changes in senior management
- Changes in the Company’s accountants or accounting policies

Securities laws, which prohibit insider trading, apply to other related conduct that we must also be aware of. For example, we must refrain from trading in the

securities of any company with whom we do business, if we possess material, non-public information about that company, and we obtained that information in the course of our work. We must also not disclose material, non-public information about the Company to anyone outside of the Company, including our family members or friends – a practice that is commonly referred to as “tipping.”

The Company’s Insider Trading and Disclosure Policy is designed to ensure our compliance with securities laws prohibiting insider trading. If you have a question about this policy or whether conduct that you intend to engage in is subject to this policy, it is your responsibility to contact the Legal Department for guidance.

For more information, see our Insider Trading and Disclosure Policy.



## What Would You Do



During lunch, Joe likes to catch up with his friends' posts on Facebook. One day, while browsing Facebook, he comes across a post that is intended to be funny, but most would consider the subject offensive. Joe happens to think it's funny and that his other friends will appreciate the humor as well, so he shares the post before logging off and going about his day.

### ***Has Joe violated Company policy?***

Yes, even though Joe is permitted to access social media during his lunch break, and he is even permitted to use company issued equipment to do so, he must comply at all times with our other policies that apply to his activity. In this particular case, the content that Joe accessed was offensive. By accessing and then retransmitting that content, Joe violated our policy regarding the proper use of electronic communication equipment.

## Social Media

The internet provides unique opportunities to participate in interactive discussions and share information on particular topics using a wide variety of social media, such as Facebook, Twitter, blogs and wikis. However, our use of social media can pose risks to our confidential and proprietary information, reputation and brands, can expose us to discrimination and harassment claims and can jeopardize our compliance with applicable laws.

To minimize these risks, we must all adhere to a few simple rules:

### **Follow Company Policies at all Times**

Social media must never be used in a way that violates any of our other policies. If you use the Company's computers, networks, telephones or other electronic devices or IT resources to access social media, you are responsible for understanding how these other policies apply to your activity. Specifically, you should review the section titled Electronic Communications and Equipment on page 6 of this Code.



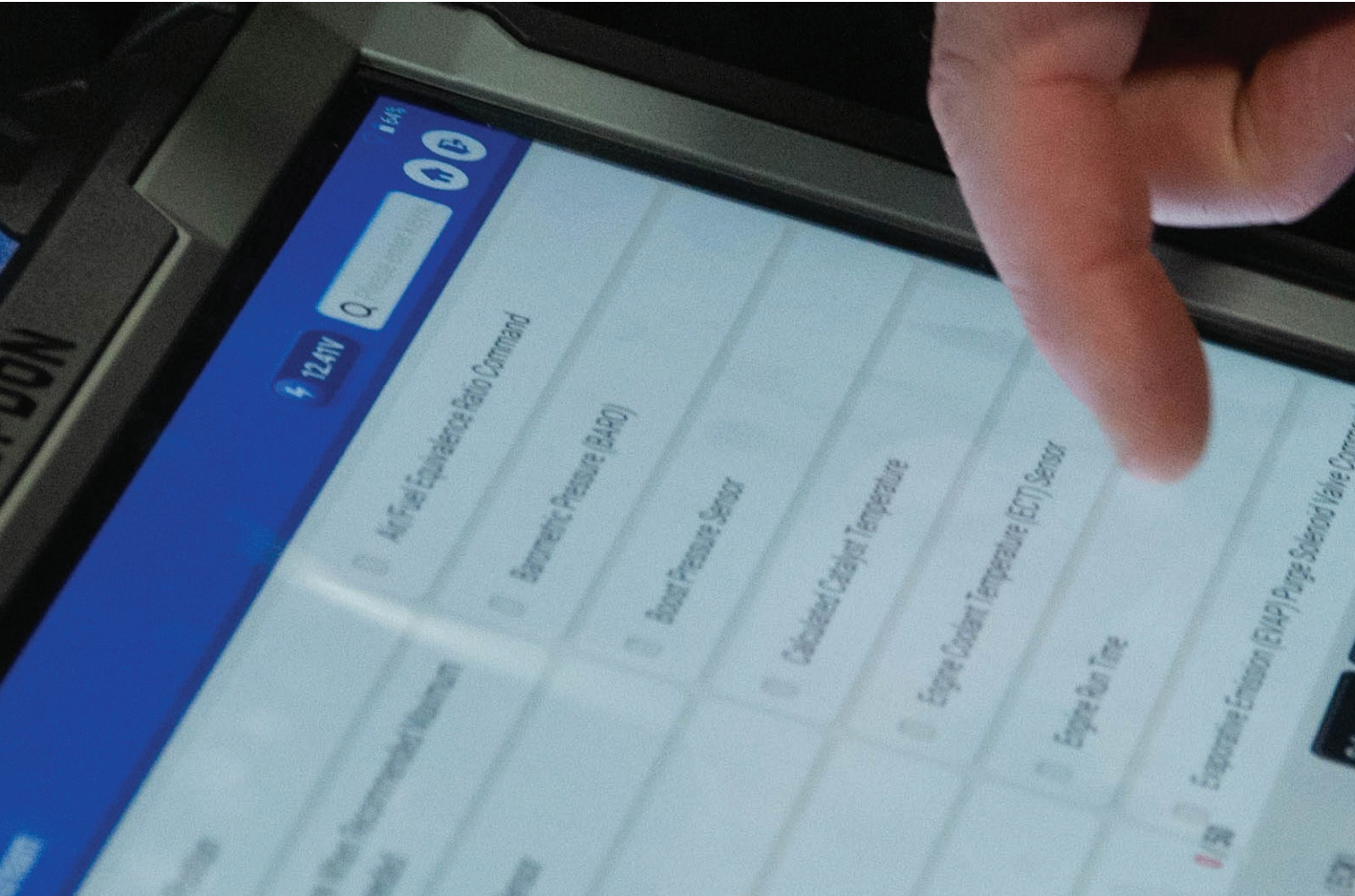
### **Personal Use**

Always exercise good judgment when using social media, and recognize that while we are on break or during lunch, we are permitted to make limited personal use of social media; however, our personal use must never interfere with our work. If your use of social media affects your productivity or distracts you from your work, you may be required to cease all use on a temporary or permanent basis during the workday.

### **Business Use**

If you are required to use social media as part of your duties for marketing, public relations, recruitment, corporate communications or other business purposes, you are responsible for adhering to all guidelines and procedures that apply to your duties. If you have a question about any aspect of these guidelines or procedures, it is your responsibility to contact your manager for guidance.





## What Would You Do

Sarah, a manager in the Marketing Department, receives a call one day from a journalist. The journalist has a few questions about a significant new product that the Company is rumored to soon release. Sarah is very familiar with the product and has even worked on the press release announcing the product, which is scheduled to issue the following day. She is eager to promote the benefits of the product and would like to seize this opportunity to get additional coverage.

***Should she talk to the journalist?***

In general, Sarah may not talk to the journalist regarding any matter unless she is specifically authorized to speak on behalf of the Company. If Sarah has been given authorization to issue statements regarding this particular product, she should still refrain from doing so in this instance. The Company's plans to sell a significant new product could be deemed material, non-public information. In such cases, the Company will have a communications plan that will ensure the fair, accurate and timely disclosure of the new product offering in compliance with applicable law. Sarah should err on the side of caution, and refrain from making any statement to the journalist that could jeopardize that communications plan.

## Publicity and Corporate Communications

As a public company, we have a duty to comply with all laws that apply to the fair, accurate and timely disclosure of information in our corporate communications. It is also important that our external communications deliver a clear and consistent message on behalf of the Company to maintain the image of our Company and the quality of our brands, products and services. For these reasons, unless you are specifically authorized, you may never comment or issue any statement on behalf of the Company.

If you are contacted for comment about the Company, including in any social media outlet, direct the inquiry to the Office of the Chief Executive and do not respond without prior written approval.

# Our Commitment to Our Employees

## Commitment to Employees

Our commitment to our employees is one of the fundamental tenets of our Code, and it derives from our respect for the dignity of our employees. We truly believe that our people and our culture are our most important assets, and to achieve our greatest potential as an organization, we must all work in an environment where every individual has the opportunity to succeed.

## Prohibiting Unlawful Retaliation

We will not tolerate unlawful retaliation by any employee against any other employee. Unlawful retaliation may come in the form of discipline, reprisal or intimidation for participating in any activity protected by law. Regardless of the form, it is strictly prohibited.

The following are examples of activities that are protected by law:

- Submitting a good faith internal complaint with Human Resources to report unlawful discrimination or harassment
- Participating in an internal investigation into allegations of sexual harassment
- Requesting an accommodation under the Americans with Disabilities Act
- Requesting or taking leave under the Family and Medical Leave Act
- Filing a worker's compensation claim

If you experience conduct that you believe violates this policy, you have a duty to promptly report the conduct to your manager, a Human Resources manager or the Legal Department, so that we can investigate the matter and take prompt corrective action, if appropriate. See page 24 of this Code for more information on how to report a concern.





## What Would You Do

### Promoting a Safe and Healthy Environment

We view the health and safety of our people as an important measure of our success. Accordingly, we must all work to achieve a zero incidence rate for work-related injuries and illnesses.

To achieve this goal, we implement robust safety procedures throughout our business operations to protect our people and ensure our compliance with applicable laws and regulations. We are all responsible for understanding these procedures, as they relate to our particular duties, and for ensuring that we follow them in the administration of our duties.

If you witness an unsafe condition or a potential hazard, you have a duty to report it to your manager or a Human Resources manager as soon as possible. You must also report all workplace injuries, accidents or illness to your manager or a Human Resources manager as soon as possible, regardless of the severity.

Examples of unsafe working conditions:

- You observe a co-worker operating equipment, and you notice that the co-worker is not following the safety guidelines that should be followed while using the equipment
- You notice a wet substance on the floor, and you realize that someone passing by could slip and fall on the substance
- You are asked to perform a task, and you received training on how to perform the task safely, but you don't quite remember the training

Michelle operates an injection mold machine. During the course of her shift, she notices that the machine guard has been failing to engage. The guard is a safety feature that is supposed to cause the machine to immediately shutdown when something crosses its barrier. Fixing the guard will cause the machine to be out of commission for at least a week, which would in turn cause Michelle's team to miss their production targets. Michelle is an experienced operator and knows that she can continue to operate the machine by simply compensating for the guard, so long as she remains diligent.

#### ***What should Michelle do?***

Michelle must immediately cease operation of the machine, and report the failure of the machine guard to her manager or a Human Resources manager. The failure of the guard is an unsafe condition, and Michelle has a duty to report the condition, regardless of her ability to operate the machine safely. If Michelle fails to report the situation, she could also unintentionally create an unsafe working condition for her co-workers who will operate the machine on the next shift.



## What Would You Do



Sam and a few of his co-workers receive an email one day from their manager, George, which includes a joke making fun of people of various ethnicities. Sam feels uncomfortable receiving the email, but doesn't know how to respond. He would like to ask George to not send him emails like that, but he's concerned that if he speaks up, George might take offense and pass Sam over at the next opportunity for advancement.

### *What should Sam do?*

George's actions violate Company policy, and Sam should not fear retaliation for reporting the matter. There are a number of ways that Sam may report the matter. Sam may speak directly with Human Resources or the Legal Department on a confidential basis, if he desires. Alternatively, Sam may report George's actions on an anonymous basis using our toll-free hotline or the Internet. For more information, see the section titled Reporting Concerns on page 24 of this Code.

## Preventing the Abuse of Drugs and Alcohol

We are committed to providing a safe, healthy and productive workplace that is free from alcohol and illegal drugs (as classified under federal, state or local laws). Employees that work while under the influence of alcohol or illegal drugs pose a safety risk to themselves and to others. Therefore, we must never be under the influence of these substances while on Company premises or while conducting business on behalf of the Company.

Occasionally, we may sponsor social or business-related events at which alcohol is served. You are not prohibited from consuming alcohol at these events. However, if you choose to do so, you must do so responsibly and conduct yourself properly and professionally at all times.

This policy is also not meant to prohibit the appropriate use of over-the-counter medication or medication that is legally prescribed to treat a disability. However, if the medication could impair your job performance, your safety or the safety of others, or if you need a reasonable accommodation before reporting to work as a result of the medication, you have a duty to notify your manager or a Human Resources manager before beginning any work.

## Promoting the Fair and Equal Treatment of All Employees

In order to attract, motivate and retain a talented workforce, which we believe to be critical for our long-term success, we are dedicated to maintaining a professional environment that is free from discrimination and harassment.

### **Harassment**

We must all be committed to maintaining an environment that is free from harassment both at the workplace and at any Company-sponsored events. In general, we view "harassment" as any behavior that has the purpose or effect of creating a hostile work environment. This type of behavior may take many different forms, such as verbal comments (e.g., derogatory statements or jokes), physical acts (e.g., contact with a person or an object), or visual perceptions (e.g., images, texts, emails or gestures).

### **Sexual Harassment**

Harassment may also include unwelcome sexual advances, unwelcome physical contact, requests for sexual favors or any other conduct of a sexual nature.

## Discrimination

We are committed to fostering a work environment that promotes the fair and equal treatment of all employees, where employment-related decisions are based solely on a person's qualifications and performance. We will not make any employment-related decisions on the basis of gender, sex, race, ethnicity, sexual orientation, gender identity and/or expression, religion, creed, nationality, citizenship, age, physical or mental disability, genetic information, military service, or any other characteristic protected by applicable law.

Furthermore, we strive to promote diversity, equity and inclusion ("DEI") in our policies and practices because we believe an equitable environment of diverse people, working together, aids our success. Our DEI Steering Committee works to devise strategies for training, education and empowerment of employees as well as recruitment and retention

of a diverse workforce. More information on our DEI efforts can be found in our Sustainability Report located on our website.

Regardless of the form, discrimination and harassment will not be tolerated. If you witness or experience conduct that you believe violates this policy, you have a duty to promptly report the conduct to your manager, a Human Resources manager or the Legal Department, so that we can investigate the matter and take prompt corrective action, if appropriate. See page 24 of this Code for more information on how to report a concern. If you make a report in good faith, you will be protected from retaliation.



## What Would You Do

Mark, an Engineering manager, has been evaluating two employees for potential advancement to a more senior level position within the department. Mark has been carefully weighing each candidate's qualifications; however, the fact that one of the candidates is ten years older than the other is weighing on his mind. He invested a significant amount of time and resources into training the predecessor, and he can't help but feel that the older candidate will be less likely to remain with the Company for the long-term.

***Is it acceptable for Mark to consider the candidate's age?***

No, the evaluation of a candidate for potential advancement is an employment-related decision. As such, Mark must base his evaluation solely on the candidate's qualifications and performance. It would never be acceptable for Mark to consider the candidate's age in reaching his decision.





# Our Commitment to Our Customers, Suppliers and Other Business Partners



## Fair Dealing

Each director, officer and employee must deal fairly with the Company's customers, suppliers, partners, service providers, competitors, employees and anyone else with whom they have contact in the course of performing their job. No director, officer or employee may take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any other unfair dealing practice.

## Product Safety and Quality

As a manufacturer and distributor of automotive parts, we place significant value on the quality of our parts and in ensuring that our parts meet or exceed rigorous testing standards and performance specifications. We hold these values because our parts have the ability to affect the operation of motor vehicles, and as such, we have a duty to deliver safe, reliable and high-quality parts to our customers.

If you are responsible for engineering, manufacturing or testing our products, or if you have contact with our customers relating to quality or performance issues, you have a duty to adhere to the quality processes and procedures that apply to your work. If you have any concern relating to product safety, you have a duty to report it to your manager as soon as possible.

## Antitrust Laws

The goal of antitrust laws is to create a competitive marketplace, in which efficient and innovative businesses thrive. We believe that our Company will prosper in a marketplace free of collusion and anticompetitive practices, and we support the enforcement of antitrust laws in all of the markets in which we compete.

To ensure our compliance with these laws, we must be mindful of the following:

### Dealings with Competitors

Agreements among competitors to fix prices, restrict output or allocate market share are illegal, whether the agreement is in writing or made verbally. These agreements are known as "cartels", and are the most serious form of antitrust violation. Collaborations among competitors may also violate antitrust laws when they have a harmful effect on competition. For these reasons, all of our dealings with competitors must be reviewed with the Legal Department to ensure our compliance with antitrust laws.



### Dealings with customers or suppliers

Restrictions on the resale of our products, such as resale price agreements, exclusive territories and customer restrictions, may be illegal if they impair competition. Antitrust risks may also arise in other aspects of our relationships with customers and suppliers. For example, requiring a customer to purchase a second product as a condition of purchasing the product that it desires to purchase (a practice known as “tying”), or charging different prices to different customers under conditions which may injure competition (a practice known as “price discrimination”) may also violate antitrust laws.

All of these arrangements must be reviewed with the Legal Department to ensure our compliance with antitrust laws.

### Market Intelligence

To compete effectively, we may gather information about our competitors’ actions in the marketplace; however, we must always gather this information in a legal and ethical manner. We should never obtain this type of information directly from our competitors, because the exchange of sensitive information could be deemed to imply an agreement.

### Trade Associations and Trade Shows

Occasionally, certain employees may participate in trade associations or trade shows in which our competitors may also participate. These events serve a variety of important objectives for our Company; however, we must be particularly cautious in these situations to avoid engaging in any improper business practices or even the appearance of engaging in such practices.

If you have a question about how these laws relate to your particular duties, it is your responsibility to contact your manager or the Legal Department for guidance.



## What Would You Do

Dan recently attended a popular trade show, where industry players get together to showcase new products and services. Dan was particularly excited for the show because he was tasked with managing the Company’s booth, which would be exhibiting a new and exciting product line. While at the show, Dan is approached by Peter, a friend and former co-worker, who now works for a competitor. Peter congratulates Dan on the new product line, and rather casually asks about how the Company will consider pricing the new product line.

### *How should Dan respond?*

Even though Peter is a friend, he is employed by a competitor, and under these circumstances, Dan must promptly inform Peter that it is against Company policy to discuss pricing with him. Otherwise, Dan may be polite and cordial with Peter, and discuss subjects that are unrelated to our Company and its business. Afterwards, Dan should contact the Legal Department to report the situation and how he handled it.





## Safeguarding Customer and Supplier Information

Our customers, suppliers and other business partners may share their confidential, proprietary and non-public information with us in the course of our business dealings with them. We have a duty to protect and safeguard the confidentiality of this information, and to use it only for the purpose for which it was disclosed to us.

We must also not disclose this information to any person, including any person outside our organization (such as suppliers) or within our organization (such as fellow employees), unless that person has a business need to know the information and we have the right to share it with them. If we do have the right to share confidential information with another person, in most instances, we will be responsible for that person's misuse of the information, so we must make sure that we have appropriate agreements and controls in place to respond to this risk.

If you receive any request or demand to disclose information under any law, regulation or order issued by a court or governmental agency, you must immediately contact the Legal Department, so that the Legal Department may respond to the inquiry.

For guidance on our duty to maintain the confidentiality of information belonging to the Company, review the section titled Confidential Information on page 8 of this Code.

## Respecting the Intellectual Property Rights of Others

The term “intellectual property” or “IP” refers to valuable, legally protected rights that are the product of the human intellect, such as patents (e.g., processes, methods and manufactured goods), copyrights (e.g., software, websites and catalogs), trademarks (e.g., names, logos and slogans) and trade secrets (e.g., business, financial and technical information).

Applicable law establishes the owner of IP and how that owner may use or restrict others from using its IP. In performing our work, we must take care to respect the IP rights of others. We must never intentionally infringe another person’s IP rights. If we are given the right to use another person’s IP, we must make sure that our use complies with the rights that were given to us.





# Commitment to Our Community



## Ethical Labor Practices

We forbid the use of slavery, human trafficking, forced labor and unlawful child labor in all aspects of our business operations throughout the world, and we will not tolerate the use of such practices by those with whom we conduct business. We fully support laws that are designed to eradicate such practices, and establish minimum ages for employment and the fair and equitable treatment of employees.

## Environmentally Conscious Practices

We are committed to conducting our business operations in an environmentally responsible manner. We assess the environmental impact of our operations and strive to implement innovative and efficient manufacturing processes to reduce our impact. We also implement and maintain certified environmental management systems where appropriate in our operations to assist us in these endeavors by giving us the tools needed to measure and improve our environmental impact. More information about our environmentally conscious efforts can be found in our Sustainability Report located on our website.

Occasionally, we may be required to transport, store, use or dispose of regulated materials in our operations, including chemicals and hazardous substances. If your duties require you to work with these materials, you are responsible for adhering to our processes and procedures that apply to your duties to ensure our compliance with applicable law. If you have any concern relating to the transportation, storage, use or disposal of regulated materials, you have a duty to report it to your manager as soon as possible.



## What Would You Do

### Anti-Bribery and Anti-Corruption

We conduct our operations and activities throughout the world in complete compliance with the letter and spirit of applicable laws and regulations that forbid bribery and corrupt payments, including the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act, and any other similar laws or regulations that apply to us.

Under the FCPA, we may never offer or make any payment, or give anything of value, to a foreign official to secure an improper advantage, obtain or retain business, or direct business to any other person or business. Potential FCPA violations arise in a variety of settings and include a broad range of activities beyond the obvious cash bribe or kickback. The term “anything of value” is very broad and can include: gifts, travel, meals, lodging, entertainment, charitable or political donations, or business, employment or investment opportunities. The term “foreign official” is also very broad, and includes employees of foreign governments or their departments or agencies, employees of businesses owned by foreign governments, foreign political parties and officials, and candidates for political office.

We also have a duty to ensure that any business partner who is acting on our behalf adheres to our anti-bribery and anti-corruption policy.

If a foreign official ever attempts to solicit or extort an improper payment or anything of value, you must inform the foreign official that the Company does not engage in such conduct and immediately contact the Legal Department for guidance. The penalties for violating the FCPA are severe. In addition to being subject to the Company’s disciplinary policies (including termination), individuals who violate the FCPA may also be subject to imprisonment and fines.

For more information, see our Foreign Corrupt Practices Act Policy.



Lisa recently hired a new freight forwarding company to deliver the Company’s products to various customers in Central America. The fees that the forwarder has been charging Lisa have been consistent with their prior agreement, but one day, the forwarder tells Lisa that there is a problem importing a shipment into Honduras, and for a one-time cash payment, the forwarder can make the problem go away. The payment seems small to Lisa, especially given the size of the order. Lisa also doesn’t want to upset the customer that is waiting to receive the order by reporting a delay.

#### ***What should Lisa do?***

Lisa should immediately contact the Legal Department. The payment that the forwarder would like to make may be completely appropriate and lawful, or it may violate applicable laws that forbid bribery and corruption. In either case, it is very important that Lisa recognizes the potential issue, and contacts the Legal Department for guidance.



# Reporting Concerns



We cannot achieve our commitment to operating at the highest level of ethical and legal conduct without your help. To achieve this goal, we need you to voice genuinely held concerns about behavior, or decisions or actions that you perceive to be unlawful, unethical or in violation of Company policies. The opportunity to report concerns is also available to all of our stockholders, customers and suppliers, as well as to any other interested person. Your report will be reviewed by management, and your identity will be protected if you so request.

## Reporting Channels

You may report any concern that you have through our toll-free helpline or our dedicated website, email address, fax number or mobile app, which are available 24-hours per day, 7-days per week. All of these reporting channels are operated by a third party service provider, and all reports received will be promptly directed to appropriate Company personnel for evaluation and handling on an anonymous basis if you so request. All inquiries will be kept strictly confidential.

### Toll-Free Helpline

<u>Country</u>	<u>Toll-Free Number</u>
US and Canada	English: 844-600-0079 / Spanish: 800-216-1288 / French: 855-725-0002
Mexico	01-800-681-5340
China	Dial AT&T access code 10-811 or 108-888. Then dial 800-603-2869
Germany	Dial AT&T access code 0-800-225-5288. Then dial 800-603-2869
Hong Kong	Dial AT&T access code 800-93-2266. Then dial 800-603-2869
Hungary	Dial AT&T access code 06-800-011-11. Then dial 800-603-2869
Poland	Dial AT&T access code 0-0-800-111-1111. Then dial 800-603-2869
United Kingdom	Dial AT&T access code 0-800-89-0011. Then dial 800-603-2869

\* AT&T access codes are subject to change. For the most up-to-date information relating to these access codes, please visit AT&T's website at <http://www.business.att.com/bt/access.jsp>.

**Website Address** <http://www.lighthouse-services.com/smpcorp>

**E-Mail Address** [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (be sure to reference the Company by name)

**Fax Number** 215-689-3885 (be sure to reference the Company by name)

**Mobile App** Anonymous Reporting by Lighthouse (use keyword "smpcorp"), available at the App Store and Google Play Store

## Contact the Company Directly

### Legal Department

Standard Motor Products, Inc.  
37-18 Northern Boulevard  
Long Island City, New York 11101  
Attn: Carmine J. Broccole  
Chief Legal Officer

### Audit Committee of the Board of Directors

Standard Motor Products, Inc.  
37-18 Northern Boulevard  
Long Island City, New York 11101  
Attn: Pamela Forbes Lieberman

## Investigating Concerns & Enforcing the Code

Our management takes violations of our Code and other Company policies seriously. We will promptly investigate matters that are reported to the Company and take appropriate action when we determine that a violation has occurred or is likely to occur in the future. All employees are expected to co-operate with investigations as directed by the Legal Department. Upon the determination that there has been a violation of this Code or other Company policies, we may take such preventative action or disciplinary action as we deem appropriate, including reassignment, demotion or termination of employment.

## Non-Retaliation Policy

We will not tolerate acts of retaliation against anyone who believes that a violation of the Code or any other Company policy has occurred, and who makes a good faith report to the Company.

For more information, see our Whistleblower Policy.

## Amending or Waiving the Code

This Code may be amended only with the approval of the Audit Committee of the Board of Directors. The Audit Committee must also approve any waiver of the Code for any member of our Board of Directors or for any executive officer. The Chief Legal Officer may approve any waiver of the Code for any other person. All waivers of the Code will be publicly disclosed, if required by applicable laws, rules and regulations.

**All policies, procedures and guidelines referenced throughout this Code of Ethics are available by contacting the Human Resources Department at our corporate headquarters in Long Island City, New York.**





37-18 Northern Boulevard, Long Island City, NY 11101

| [smpcorp.com](http://smpcorp.com)