

# LKQ CORPORATION

## POLICY FOR HANDLING COMPLAINTS REGARDING ACCOUNTING AND AUDITING MATTERS

**October 27, 2003**

### INTRODUCTION

LKQ Corporation (“**LKQ**”) is committed to the highest ethical standards, to conducting its business with the highest level of integrity, and to full compliance with applicable laws, rules, and regulations. The Audit Committee of the Board of Directors has approved and adopted this Policy for Handling Complaints Regarding Accounting and Auditing Matters (this “**Complaint Policy**”) to comply with Section 301 of the Sarbanes-Oxley Act of 2002 (“**Section 301**”).

Section 301 requires the Audit Committee to establish procedures for:

- the receipt, retention, and treatment of complaints received by LKQ regarding accounting, internal accounting controls, or auditing matters; and
- the submission by employees of LKQ, on a confidential and anonymous basis, of concerns regarding questionable accounting practices or auditing matters.

This Complaint Policy applies to all employees of LKQ. You are bound by the requirements and standards set forth in this Complaint Policy, and your violation of this Complaint Policy will subject you to disciplinary action, which may include termination of employment.

### PRINCIPLES AND RESPONSIBILITIES

You shall adhere to and advocate, to the best of your ability, the following principles and responsibilities governing your professional and ethical conduct:

#### *Scope of Matters Covered by this Complaint Policy*

- You are encouraged to report any complaint or concern relating to any questionable accounting practice or auditing matter (each, an “**Accounting Complaint**”), including without limitation the following:
  - fraud in the preparation, evaluation, review, or audit of any LKQ financial statement;
  - fraud in the recording of any transaction or the maintaining of LKQ’s financial records;
  - deficiencies in or failure to comply with LKQ’s internal accounting controls;
  - any misrepresentation or false statement regarding a matter contained in LKQ’s financial records, financial reports, or any audit report delivered in connection with LKQ’s financial statements; or
  - any deviation from the complete, accurate, and fair reporting of LKQ’s results of operations or financial condition.

### *Reporting Responsibilities*

- You may report any Accounting Complaint to LKQ's General Counsel, whose contact information is listed below.
- You may forward any Accounting Complaint to the General Counsel on a confidential or anonymous basis, via phone, e-mail, fax, or mail.
- If you make any Accounting Complaint under this Complaint Policy, LKQ will exercise particular care to keep confidential your identity until a formal investigation is launched. At that point, your identity may be kept confidential, if requested, unless confidentiality is incompatible with a full and fair investigation, unless there is an overriding reason for identifying you or unless disclosure of your identity is required by law.

### *No Retaliation*

- You shall not discharge, demote, suspend, threaten, harass, or in any way discriminate against an LKQ employee who in good faith reports an Accounting Complaint.
- This Complaint Policy is intended to encourage and enable employees to raise within LKQ serious concerns about accounting and auditing matters.

### *Handling of Accounting Complaints*

- Upon receipt of an Accounting Complaint, the General Counsel will:
  - determine whether the Accounting Complaint actually pertains to a questionable accounting practice or auditing matter; and
  - when possible, acknowledge receipt of the Accounting Complaint to the sender.
- Accounting Complaints will be reviewed under the direction of the Audit Committee, with assistance and input from the General Counsel and/or such other LKQ employees or outside advisors as the Audit Committee deems appropriate.
- When and to the extent the Audit Committee determines appropriate, the Audit Committee shall take prompt corrective action with respect to an Audit Complaint.

### *Reporting and Retention of Audit Complaints and Related Investigations*

- The General Counsel shall maintain a log of all Accounting Complaints, tracking their receipt, investigation, and resolution.
- The General Counsel shall submit to the Audit Committee a quarterly summary of all Accounting Complaints received, investigated, and resolved since the last summary.
- The Audit Committee shall retain any and all documentation concerning Accounting Complaints, for a period of not less than seven years.

*Contact Information for General Counsel*

**Phone Number:** 312-280-3708  
**Fax Number:** 312-280-3730  
**Mailing Address:** Victor M. Casini  
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120 North LaSalle Street  
Suite 3300  
Chicago, Illinois 60602