

CORPORATE

SUSTAINABILITY

REPORT

2019



CONTINUING --- OUR COMPANY

COMMITMENT

TECHNOLOGY-DRIVEN MOBILITY SOLUTIONS

We are a leading provider of technology-driven mobility solutions for aviation, commercial, hospitality and institutional clients throughout North America. We facilitate the efficient movement of people, vehicles and personal belongings with the goal of enhancing the consumer experience while improving bottom line results for our clients. SP+ provides professional parking management, ground transportation, remote baggage check-in and handling, facility maintenance, security, event logistics, and other technology-driven mobility solutions.

INNOVATION IN OPERATIONS

SP+ is built on excellence and integrity, with a commitment to advance Innovation in Operation that enables us to deliver the highest level of service and satisfaction. At SP+, we strive to develop new and better ways of doing things to improve the effectiveness and efficiency of everything we do for our stakeholders—investors, employees, clients and communities—using our shared cultural attributes. Consistent with this commitment, we have integrated green initiatives into SP+'s culture as a responsible corporate citizen.

SP+ published its first Corporate Sustainability Report for 2017. Since then, we have continued our commitment to focus on programs and strategies that reflect our culture, our commitment to sustainability and to positively impact the communities in which we live and work.

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STATEMENT FROM

MARC BAUMANN

CHIEF EXECUTIVE OFFICER

Dear Reader,

I am pleased to present SP Plus Corporation's third consecutive Corporate Sustainability Report. As an industry leader, it's important for us to do our part to incorporate sustainable solutions into our operations to benefit our clients, customers, shareholders, employees and people in the communities we serve. We take that responsibility seriously.

This year's report demonstrates the numerous economic, environmental and social advancements we've pushed in our business practices and cultural initiatives throughout 2019. We're excited to share this report with you and even more enthusiastic about continuing to embed sustainable methods in all we do.

GENERAL DISCLOSURES

& MANAGEMENT APPROACH



ORGANIZATIONAL PROFILE



STRATEGY



ETHICS & INTEGRITY



GOVERNANCE



STAKEHOLDER ENGAGEMENT



REPORTING PRACTICE



ORGANIZATIONAL PROFILE

NAME OF THE ORGANIZATION (102-1)

SP Plus Corporation

ACTIVITIES, BRANDS, PRODUCTS & SERVICES (102-2)

SP Plus Corporation is a leading provider of technology-driven mobility solutions for aviation, commercial, hospitality and institutional clients throughout North America.

SERVICES

- + Parking Management
- + Ground Transportation
- + Facility Maintenance
- + Event Logistics
- + Consulting
- + Security
- + Remote Airline Check-In
- + Baggage Handling

SEGMENT REPORTING



REGION ONE

Commercial

The Commercial segment encompasses our services in healthcare facilities, municipalities, including meter revenue collection and enforcement services, government facilities, hotels, commercial real estate, residential communities, retail, colleges and universities, as well as ancillary services such as shuttle and transportation services, valet services, taxi and livery dispatch services and event planning, including shuttle and transportation services.



REGION TWO

Aviation

The Aviation segment encompasses our services at all major airports, including shuttle, transportation, valet, remote check in and baggage handling services.



REGION THREE

Other

"Other" consists of ancillary revenue that is not specifically identifiable to Commercial or Aviation and certain unallocated items, including prior year insurance reserve adjustments/costs and other corporate items.

OPERATING GROUPS

Our services are provided across nine key vertical markets, enabling SP+ to apply its tailored expertise and address specific market needs.



Airports covers services supporting airlines and airports, including parking management, valet parking, shuttle buses, curbside management, parking facility planning, facility maintenance, and safety, and security.



Events & Venues encompasses event logistics, bid preparation services, event parking and transportation management, marketing programs, and overall experience.



Healthcare includes parking management, valet parking, validation programs, facility maintenance, and shuttle bus services.



Hospitality covers parking management, valet parking, shuttle bus services, facility maintenance and event logistics.



Municipal encompasses parking equipment acquisition, installation and financing services; parking meter enforcement, event logistics, facility maintenance, and shuttle bus services.



Office includes parking management, shuttle bus services, and facility maintenance.



Residential encompasses parking management, valet parking, facility maintenance, and shuttle bus services.



Retail covers parking management, valet parking, shuttle bus services, and facility maintenance.



University includes parking and access management, parking planning analysis, shuttle bus services, event logistics, and facility maintenance.

Information about our markets and operating groups can be found on our website at spplus.com.

SUSTAINABILITY

SP+'s mission is to maximize client value through delivering creative and innovative management services, consistent with our longstanding commitment as a proactive, responsible citizen.

SP+ is dedicated to sustainability, whether in our operations, our administrative processes, or our general activities within our industry. With this commitment, our clients can be confident that the experience we provide will be aligned with our culture of acting in our customers'—and our planet's—best interests.

“GREEN” PARKING OPERATIONS

+ Environmental Training

SP+ has developed proprietary SP+ University™ internal training curricula focused on environmental protection, sustainability and compliance training. Educating our employees to “Think Green” is part of our training agenda.

+ Parking.com Website & Mobile App

The Parking.com website and mobile app serve as our primary online selling platform. This easy-to-use site and mobile app offer customers the ability to search, check availability, compare pricing, reserve and purchase parking at locations across North America, saving drivers time, money, and gas through online payments, a parking locator, a frequent parker program, and online reservations.



+ ParkSmart

SP+ is an active member of Parksmart, the Parking Facility division of the Green Building Council. Over the years SP+ has had representation on both the board of directors and its committees. Parksmart is tasked with gathering information about green technologies applicable to the parking industry and current legislation regarding tax incentives and rebates for those technologies to augment the purely environmental benefits derived from such green measures.

SP+ has been among the operators and owners recognized at the IPI Awards for achieving Parksmart Certification, including our location at 1600 Smith in Houston, Texas.

Through Parksmart, SP+ offers a site survey tool to assess garage structure and environmental footprint in order to offer recommendations to improve a facility's sustainability level. Recommendations may include lighting, EV charging stations, recycling programs, air quality, and low-impact building materials. Once improvements are undertaken, facilities are eligible for a Green Garage Certification through Parksmart. We offer the procurement of site surveys for our clients. Green Garage Certification may be awarded to a facility that reduces its environmental impact, increases energy efficiency and performance, manages parking spaces efficiently, encourages alternative mobility options, and strengthens community relationships.

+ **Clean & Safe Parking**

SP+ sets standards for our parking operations and we maintain them through a carefully developed, strictly enforced monitoring system. Our operations combine cutting-edge technology with highly trained parking professionals to provide customers with clean and safe parking.

Our certified team of technicians maintains facilities by providing maintenance services, including power sweeping and washing, gum and graffiti removal, snow removal, concrete and asphalt repairs, general housekeeping, and painting. We seek to provide a safe parking and valet environment by ensuring that parking facilities are well-lit, signs and emergency exits are clear and visible and customer service specialists are available to oversee emergencies.

+ **Ecologically Responsible Garage & Vehicle Washing**

Keeping our garages clean is vital to our clients and customers. Unless garage pressure washing, power scrubbing and car washing activities are undertaken in compliance with federal, state and local laws and regulatory ordinances, motor oil, fuel, antifreeze and other regulated substances could accidentally enter storm drains. The Federal Clean Water Act of 1977 and other federal, state, and local laws exist to protect surface water from pollutants, and SP+ is leading the way to prevent this kind of pollution as a by-product of these activities.

SP+ maintains its fleet of buses with sensitivity to the environment. If performed without regard to environmental impact, bus washing can result in cleaning chemicals and other pollutants entering the water supply. Accordingly, we take the actions necessary to assure that bus washing is performed so as to capture and properly dispose of all waste water and other contaminants.

+ **Vehicle Procurement & Maintenance**

Where our operations require support vehicles, SP+ utilizes environmentally friendly hybrid, alternative fuel, or electric vehicles to minimize adverse environmental impact, including CO2 emissions. In addition to securing and operating “green” support vehicles throughout the U.S., SP+ manages and operates fleets of fully electric transit vehicles.

We care for our vehicles to provide peak performance while ensuring fuel efficiency and conservation. Our SP+ Fleet Services division develops and implements comprehensive programs for preventive maintenance, repairs, and imaging (washing, cleaning and fueling). Our staff conducts mandatory pre-trip and post-trip inspections to confirm that vehicles are safe and operating effectively. Our custom-designed preventive maintenance programs enhance service reliability, prolong vehicle life, and assure compliance with environmental laws.

+ **Sustainable Suppliers**

SP+'s procurement department seeks suppliers committed to sustainable practices. For example, we use parking ticket suppliers that use recycled paper, environmentally friendly inks, and ship tickets in boxes made from recycled materials.

+ **Preferred Parking for Hybrid Vehicles & Scooters**

SP+ assesses the viability of offering preferred parking spaces as a means of rewarding and incentivizing the use of hybrid vehicles and scooters.



+ **Electric Vehicle Charging Stations**

SP+'s commitment to Innovation in Operation® has made us an industry leader in delivering advanced technical capabilities to solving transportation challenges. By installing electric charging facilities at our locations, we help to create a fueling network that powers the movement of people and goods one electric vehicle at a time. We have partnered with the leaders in electric charging to create new charging hubs and upgrade first generation equipment at existing facilities. Extensive OEM investments are being made in electric vehicles and SP+ is working with states and municipalities to advance their goal of a net-zero target for transportation emissions. We think it is our corporate and environmental responsibility to help advance this global cause to preserve our earth for generations to come.



+ **Ride Share & Car Pool Programs**

SP+ works with clients to implement custom-designed car pool programs and ride share options.



+ **Tire Inflation**

Having properly inflated tires is an inexpensive way consumers can improve gas mileage. Today's service stations rarely offer this service. We provide air pumps so patrons can easily inflate their tires to maximize fuel efficiency at many facilities operated by SP+.



+ Recycling Consumables

SP+ maintains recycling bins in our administrative and operations facilities. We are committed to purchasing and utilizing green products such as recycled 30% post-consumer waste, chlorine-free paper, remanufactured toner cartridges and energy efficient light bulbs. Where possible, we utilize electric hand-dryers in restrooms.



+ Energy Efficient Fixtures

We purchase and utilize energy efficient equipment and conserve energy by turning off lights and unplugging appliances when not in use.



+ Bicycle Parking

Everyday, thousands of bicyclists commuting to work park and entrust their bicycles to SP+ in one of our branded bicycle cages or amenity hubs that include service benches, air compressors, and smart bicycle parking systems. Additional bike systems are planned as we seek to support the biker community and solve basic universal issues around bike thefts, the desire for organized parking, and a solution that works with local transit cards to apply commuter tax benefits. We added bikeshare docks in New York and San Francisco to expand this mobility offering to building tenants as more people are becoming comfortable biking over driving for short-distance trips, thereby reducing congestion and emission.

“GREEN” BACK OFFICE OPERATIONS

+ **Paper Reduction, Green Supplies, Recycling & Environmental Event Participation**

SP+ is committed to the reduced use of paper, green office and cleaning supplies, recycling at client properties, and participating in environmental awareness events. Our employees are trained to conserve paper, print only what is necessary, use necessary, use the backside of discarded paper for notes and recycle or reuse paper wherever possible.

Our long-term enterprise objective is to replace practices of printing and storing hard copies with a company-wide electronic storage system. Network users utilize Google Drive for document sharing, which is tied with our Google-based email system.

+ **Procure to Pay System**

Our comprehensive procurement and accounts payable system, which is available online and through the mobile app. Product catalogs, invoicing and all related functions are performed electronically, eliminating large quantities of paper. We also offer electronic payment options to vendors, in lieu of paper check payments for goods and services.

+ **Expense Reporting System**

SP+ uses a fully-automated online expense reporting and reimbursement system to continue our commitment to efficiency and the elimination of paper. This helps us further reduce our carbon footprint. Expense receipts are uploaded to the system electronically, linked by the software with the associated expense report, and then submitted for processing and reimbursement, all without using a single sheet of paper. The system efficiently expedites expense reimbursements to our employees via direct deposit and is considerate of our environment.

+ **Recruitment/Onboarding System**

Our intuitive recruitment platform offers candidates a user-friendly application process. This tool enables us to manage our entire recruitment lifecycle—from building our talent pool and tracking applicants to onboarding new hires and related reporting—within one cloud-based application.

+ **Financial Reporting**

SP+ uses cloud systems to provide clients with secure, around-the-clock, online access to financial statements and detailed back-up. Since all reports and supporting documentation can be electronically stored, clients need only print materials that they need for specific purposes. By delivering monthly financial reports electronically, SP+ has eliminated the need to print up to 40,000 packages of hard copy financial reports every year.

+ **Payroll**

SP+ has eliminated the waste associated with conventional, paper-based time and attendance recording systems with a paperless system. It also serves as our online payroll system. SP+ employees receive direct deposit instead of paper checks.

LOCATION OF HEADQUARTERS (102-3)

Chicago, Illinois

LOCATION OF OPERATIONS (102-4)

Primary operations occur in urban markets and airports across the United States (including Puerto Rico) and Canada.

OWNERSHIP AND LEGAL FORM (102-5)

SP Plus Corporation is incorporated under the laws of the State of Delaware and is a publicly traded company, governed by a board of directors. Our common stock is listed on the NASDAQ Stock Market LLC under the symbol "SP".

The person or entities known to SP+ to be beneficial owners of more than 5% of the shares of SP+ common stock as of February 2019 are set forth below. This disclosure is based on a review of Schedule 13G filings and Schedule 13D filings.

Wellington Management Group LLP
BlackRock Institutional Trust Company, N.A.
Dimensional Fund Advisors, L.P.
P2 Capital Partners, LLC

MARKETS SERVED (102-6)

We are a leading provider of technology-driven mobility solutions for aviation, commercial, hospitality and institutional clients throughout North America. SP+ facilitates the efficient movement of people, vehicles and personal belongings with the goal of enhancing the consumer experience while improving bottom line results for our clients. The Company provides professional parking management, ground transportation, remote baggage check-in and handling, facility maintenance, security, event logistics, and other technology-driven mobility solutions.

We have built a diverse geographic footprint that spans operations in 45 states, the District of Columbia and Puerto Rico, and three Canadian provinces.

Our strategy is focused on building scale and leadership positions in large, strategic markets in order to leverage the advantages of scale across a larger number of clients in a single market.

SCALE OF THE ORGANIZATION (102-7)

NUMBER OF EMPLOYEES	28,878
NET REVENUES (in millions)	\$1,663.7
NET INCOME PER SHARE (diluted)	\$2.20

Dollar amounts in millions, except per share amounts. Information relates to SP+'s fiscal year ending December 31, 2019.

INFORMATION ON EMPLOYEES & OTHER WORKERS (102-8)

	TOTAL	FULL-TIME	PART-TIME	UNION	NON-UNION
BOARD	6				
SERVICE	22,940	12,572	10,368	6,887	16,053
STAFF & MANAGEMENT	5,938	5,384	554	653	5,285
TOTAL	28,883*	17,956	19,922	7,540	21,338

	MALE	FEMALE	AGE<30	AGE 30-50	AGE>50
BOARD	4	2	0	0	6
SERVICE	16,156	6,784	8,530	7,395	7,015
STAFF & MANAGEMENT	3,782	2,156	1,286	2,762	1,890
TOTAL	19,942*	8,942	9,816	10,157	8,905

SP+ Employee Breakdown as of December 31, 2019

* Total Figure Accounts for Employees in Multiple Categories

SUPPLY CHAIN (102-9)

SP+ has strategic partnerships with suppliers that provide efficient, state-of-the-art supply chains allowing SP+ employees to efficiently order and obtain the products used to service our clients. Having strategic suppliers employing modern supply chain practices permits SP+ to measure and minimize its carbon footprint.

SP+'s has several categories of suppliers, including suppliers for internal operations (office supplies, information technology, communications, utilities, etc.), suppliers for products used in our services (cleaning chemicals, cleaning equipment, paper and plastic liner products, EV charging stations, fleet vehicles), service providers (engineering, waste removal), and suppliers for external marketing and communications (consultants, printing, materials).

SIGNIFICANT CHANGES TO THE ORGANIZATION AND ITS SUPPLY CHAIN (102-10)

BAGS INTEGRATION & RESTRUCTURE

Following the acquisition of Bags and its subsidiaries in November 2018, we invested in the consolidation and conversion processes necessary to fully integrate Bags into the SP+ network, structure, policies and processes throughout 2019.

ELECTRIC VEHICLE CHARGING

In 2019, we began our search to find a preferred supplier to support SP+'s company-wide standard business model to include electric vehicle charging options for our clients.

NEW EXECUTIVE TEAM MEMBERS

Ritu Vig (Chief Legal Officer) and Connie Jin (SVP, Corporate Development) were promoted to the SP+ Executive Team, notably as the first women to serve at the Company's top level of management. Kristopher Roy was also promoted to the Executive Team as Chief Financial Officer.

MOBILE + PARKING PROGRAM

SP+ deployed the Mobile + Parking program in Atlanta, as the first parking operator in the United States to expand its offering of mobile payment options to five apps. Mobile + Parking was developed by the City of Atlanta and ATLPlus, the Atlanta-focused group within SP+.

CLOUD-BASED MIGRATION

We officially began our full migration to move our systems from co-locations (data centers) to become cloud-based versus hardware-based.

WOMEN'S ADVISORY FORUM

The Women's Advisory Forum launched four additional local chapters in 2019, including Detroit, Chicago, New York and Northeast/Mid-Atlantic. WAF was established to recruit a more diverse workforce, retain more female talent and eliminate gender stereotypes in the workplace.

PRECAUTIONARY PRINCIPLE OR APPROACH (102-11)

While the SP+ Board of Directors is ultimately responsible for risk oversight, the Board has delegated to our Audit Committee the primary responsibility for the oversight of risks facing our business. The Audit Committee reviews enterprise risks with our Director of Internal Audit on a periodic basis. The Audit Committee reviews risk-related findings and conclusions annually with our Board.

SP+ integrates sustainability and corporate social responsibility into our business model using these four core beliefs:

WORKPLACE ACCOUNTABILITY

Workplace Accountability focuses on a wide array of items such as talent management, diversity and inclusion, labor standards, discrimination and harassment, employee health, and employee training and safety.

MARKETPLACE ACCOUNTABILITY

Marketplace Accountability centers around service quality, responsible sourcing and supply chain management, client safety, and appropriate marketing practices.

ENVIRONMENT ACCOUNTABILITY

Environment Accountability revolves around decreasing or eradicating adverse impact on shared environments, recycling products we use and distribute, and our energy and resource efficiency.

COMMUNITY ACCOUNTABILITY

Community Accountability revolves around community involvement and philanthropy and it prospers when our core beliefs are successfully implemented.

Various federal, state and/or local laws designed to protect the environment impact our operations, including the regulation of discharges into soil, water, and air, as well as the generation, handling, storage, transportation, and disposal of waste and hazardous substances. These laws, rules and regulations may increase potential liabilities and costs to our operations.

In addition, SP+ is occasionally involved in environmental matters at certain of our locations or related to our operations. Historically, the cost of complying with environmental laws or resolving environmental issues has not had a material adverse effect on our financial position, results of operations, or cash flows.

SP+ requires its suppliers, vendors and contractors maintain high industry standards. SP+ is dedicated to complying with all applicable laws and regulations.

EXTERNAL INITIATIVES (102-12)

- + Airport Council International (ACI)
- + College Athletics Operations Services
- + Commercial Real Estate Women (CREW)
- + Institute of Real Estate Management (IREM)
- + National Center for Spectator Sports Safety & Security
- + National Healthcare Summit



MEMBERSHIP OF ASSOCIATIONS (102-13)

We are a member of numerous trade and industry groups. Our group memberships include:

NATIONAL MEMBERSHIPS

- + American Association of Airport Executives
- + Building Owners and Managers Association
- + Campus Parking and Transportation Association
- + International Association of Venue Managers
- + International Parking & Mobility Institute
- + National Association of College Auxiliary Services
- + National Association of Collegiate Directors of Athletics
- + National Parking Association
- + Parksmart
- + Stadium Manager's Association

REGIONAL MEMBERSHIPS

- + California Public Parking Association
- + Carolinas Parking Association
- + Florida Parking & Transportation Association
- + Michigan Parking Association
- + Middle Atlantic Parking Association
- + New England Parking Council
- + Ohio Parking Association
- + Parking Association of Georgia
- + Parking Association of the Virginias
- + Texas Parking and Transportation Association



STRATEGY

STATEMENT FROM SENIOR DECISION MAKER (102-14)

See the Statement from Marc Baumann, Chief Executive Officer on Page 4.



ETHICS & INTEGRITY

VALUES, PRINCIPLES, STANDARDS AND NORMS OF BEHAVIOR (102-16)

SP+ is committed to Innovation In Operation™ and follows the standards outlined in the SP+ Code of Conduct. We constantly strive to use our tools and cultural attributes to develop new and better ways to operate in order to improve the effectiveness and efficiency of everything that we do. These attributes include integrity, excellence and innovation.

INTEGRITY

We commit to behavior that reflects well on our character and reputation.

EXCELLENCE

We continuously strive for higher quality in who we are and everything we do for our clients, customers, stakeholders and each other.

INNOVATION

We encourage creative and “outside-the-box” thinking in everything we do, and delivering industry-leading products and services.



GOVERNANCE

GOVERNANCE STRUCTURE (102-18)

+ Governance

Our governance structure and Code of Business Conduct are the guidelines to ensure the maintenance of a business organization based on integrity.

+ Board of Directors

SP+'s Board of Directors is responsible for overseeing the business and strategy of the company. SP+ currently has six directors, including our Chief Executive Officer. All of our directors, other than our Chief Executive Officer, are independent, including our Chairman of the Board, Karen Garrison.

+ Committee Composition

SP+'s Audit Committee supervises our financial reporting process, meets with our independent registered public accounting firm to review the results of the annual audit, and assists the Board with respect to SP+'s compliance with legal and regulatory requirements. In addition, the Audit Committee considers conflicts of interest and reviews all transactions with related persons and meets with management to discuss legal matters and areas of risk to our company.

SP+'s Compensation Committee assists in defining a total compensation policy for our executives to support our business strategy and objectives, attract and retain key executives, link total compensation with business objectives and organizational performance, and provides competitive total compensation opportunities. This committee also reviews compensation policies and practices applicable to all employees as they relate to risk management and determines whether the risks arising from these compensation policies and practices are reasonably likely to have a material adverse effect on SP+.

The Executive Committee exercises some or all powers of our Board between regularly scheduled meetings, conducts the evaluation of the performance of the Chief Executive Officer, reviews CEO compensation and makes recommendations regarding changes to the Compensation Committee, and serves as a sounding board for management on emerging issues, problems and initiatives.

SP+'s Nominating and Corporate Governance Committee identifies experienced and well-qualified candidates to serve as directors on our Board, taking into account gender and age diversity as well as diversity of professional experience, education and other individual qualities and attributes that will contribute to Board heterogeneity. This committee recommends corporate governance policies and principles that it has developed to the Board.

Additional information about SP+'s governance structure is set forth in our 2019 Proxy Statement. More information about our Board and governance may also be found at <http://ir.spplus.com>.



STAKEHOLDER

ENGAGEMENT

LIST OF STAKEHOLDER GROUPS (102-40)

SP+ stakeholders include our clients and customers, employees, vendor/supplier partners, investors, and the communities in which we serve.

COLLECTIVE BARGAINING AGREEMENTS (102-41)

During 2019, SP+ was party to approximately 76 active collective bargaining agreements across the U.S. These collective bargaining agreements are periodically renegotiated through bargaining with labor representatives. The collective bargaining agreements set terms for wages, benefits and other terms and conditions of employment. For single-site collective bargaining agreements, SP+ bargains directly with labor representatives. For area-wide agreements, SP+ frequently bargains in a group of employers who are covered by the same agreement.

	TOTAL	FULL-TIME	PART-TIME	UNION %	NON-UNION %
Board	6				
Service	22,940	12,572	10,368	6,887 30%	16,053 70%
Staff/Management	5,938	5,384	554	653 11%	5,285 89%
TOTAL	28,884	17,956	10,992	7,540 26%	21,338 74%

IDENTIFYING AND SELECTING STAKEHOLDERS (102-42)

SP+'s critical stakeholders are identified as key participants WITH some interest or impact on our business operations, both directly and indirectly. The stakeholders selected for our 2019 Corporate Sustainability Report included SP+ executives, SP+ employees, clients and customers, investors, and vendor/supplier partners.

APPROACH TO STAKEHOLDER ENGAGEMENT (102-43)

SP+'s services are typically provided at our clients' locations and are often a part of our clients' efforts at integrating sustainability into their operations (e.g., cleaning, facility maintenance, safety, energy conservation, etc.). Therefore, our sustainability methodology starts with SP+'s service offerings and solutions.

Our employees are the engine that drives SP+ operations. We also seek to create and deliver value for our investors every day. SP+ is highly motivated to function dependably both for and within the communities we serve. SP+ reaches out to our key stakeholder groups annually for direct feedback and regularly encourages and seeks insights and comments from interested parties.

KEY TOPICS AND CONCERNS RAISED (102-44)

SP+ stakeholders include our clients and customers, employees, vendor/supplier partners, investors, and the communities in which we serve.



REPORTING

PRACTICE

ENTITIES INCLUDED IN THE CONSOLIDATED FINANCIAL STATEMENTS (102-45)

SP+ discloses all of its consolidated material subsidiaries as of December 31st, our fiscal year-end, in our annual report. See Exhibit 21.1 to SP Plus Corporation's 2019 Annual Report on Form 10-K, which was filed with the SEC in February 2019.

DEFINING REPORT CONTENT AND TOPIC BOUNDARIES (102-46)

+ Corporate Sustainability Reporting

The process for defining our 2019 Sustainability Report content was undertaken in three stages. First, an internal assessment was conducted of the information available along with the corresponding sources. The second phase was the collection of data. The last phase was the elaboration of the report, followed by a diligent internal review and approval process.

SP+'s primary stakeholders are clients and customers, employees, vendor/supplier partners, stockholders and the communities in which we serve, and our sustainability strategy is centered on addressing the various stakeholder needs.

+ Report Parameters

This is SP+'s third Corporate Sustainability Report, and it covers activities related to our fiscal year that ended December 31, 2019. It developed from discussions with important stakeholders and a materiality assessment using the Global Reporting Initiative (GRI) framework that covers Economic, Environmental and Social indicators rated important to our stakeholders. An index of the GRI indicators and metrics is provided at the end of this report.

The SP+ 2019 Corporate Sustainability Report covers services provided by SP+ and its subsidiaries throughout the United States (including Puerto Rico) and Canada. This report introduces the company, our services, and our organizational structure. We identify our key impacts, risks and opportunities relating to our corporate sustainability initiatives and our primary stakeholders. We also discuss our corporate governance initiatives that are designed to ensure our business operations are conducted with the highest integrity.

Additional information about the company can be found at www.spplus.com and in our filings with the Securities and Exchange Commission, and can be accessed at the "Investor Relations" section of the Company's website.

+ Material Topic Boundaries

MATERIAL TOPIC	DESCRIPTION	BOUNDARIES
ECONOMIC		
Economic Performance	Economic value generated and distributed through our business activities	Our economic performance impacts our investors, employees, suppliers/vendors.
Procurement Practices	Significant locations of operation that strive to purchase products and services locally	Our procurement practices impact our suppliers and vendors.
Anti-Corruption	Business practices that serve to avoid corruption, such as our Code of Business Conduct	Our business practices impact the reputation of our company in the business community and impact our clients, employees and investors.
Anti-Competitive Behavior	Business practices that have been alleged to be anti-competitive or violating anti-trust and monopoly laws	Anti-competitive business practices could impact the reputation of our company in the business community and impact our investors.
ENVIRONMENTAL		
Environmental Compliance	Non-compliance with environmental laws and regulations by our company	Non-compliance with environmental laws and regulations has the potential to adversely and directly impact clients employees, investors and local communities.
Supplier Environmental Assessment	Percentage of new supplier screened using environmental criteria	Our assessment of suppliers using environmental criteria impacts clients and local communities.
SOCIAL		
Employment	Professional opportunities and employee benefits delivered by our company. Outreach to diversity specific employment sources	Our approach to these topics has a direct impact on the employees inside our organization.
Occupational Health & Safety	Initiatives to measure, manage and reduce safety incidents, and protect employee health	
Training & Education	Investments in our employees' development	
Diversity & Equal Opportunity (Equal Remuneration)	Opportunities for employees of diverse backgrounds at all levels of our business including women	Our approach to these topics has a direct impact on the employees inside our organization.
Non-Discrimination	Providing a workplace and organization free from discrimination	
Local Communities	Benefits delivered to local communities	Through our business, we have the potential to directly and indirectly impact the communities in which we work.
Customer Health & Safety	Incidents of non-compliance concerning the health and safety impacts of products and services	Our approach to these topics has a direct impact on our clients and customers
Customer Privacy	Substantiated complaints concerning breaches of customer privacy and losses of customer data	
Socioeconomic Compliance	Non-compliance with laws and regulations in the social and economic area	Our approach to these topics has a direct impact on our clients, employees, investors and the local communities in which we work.

LIST OF MATERIAL TOPICS (102-47)

Our citizenship efforts and priorities across SP+ are informed by the wider societal context around us. SP+ stakeholder feedback and management assessments inform SP+ if a topic is of material interest.

ECONOMIC

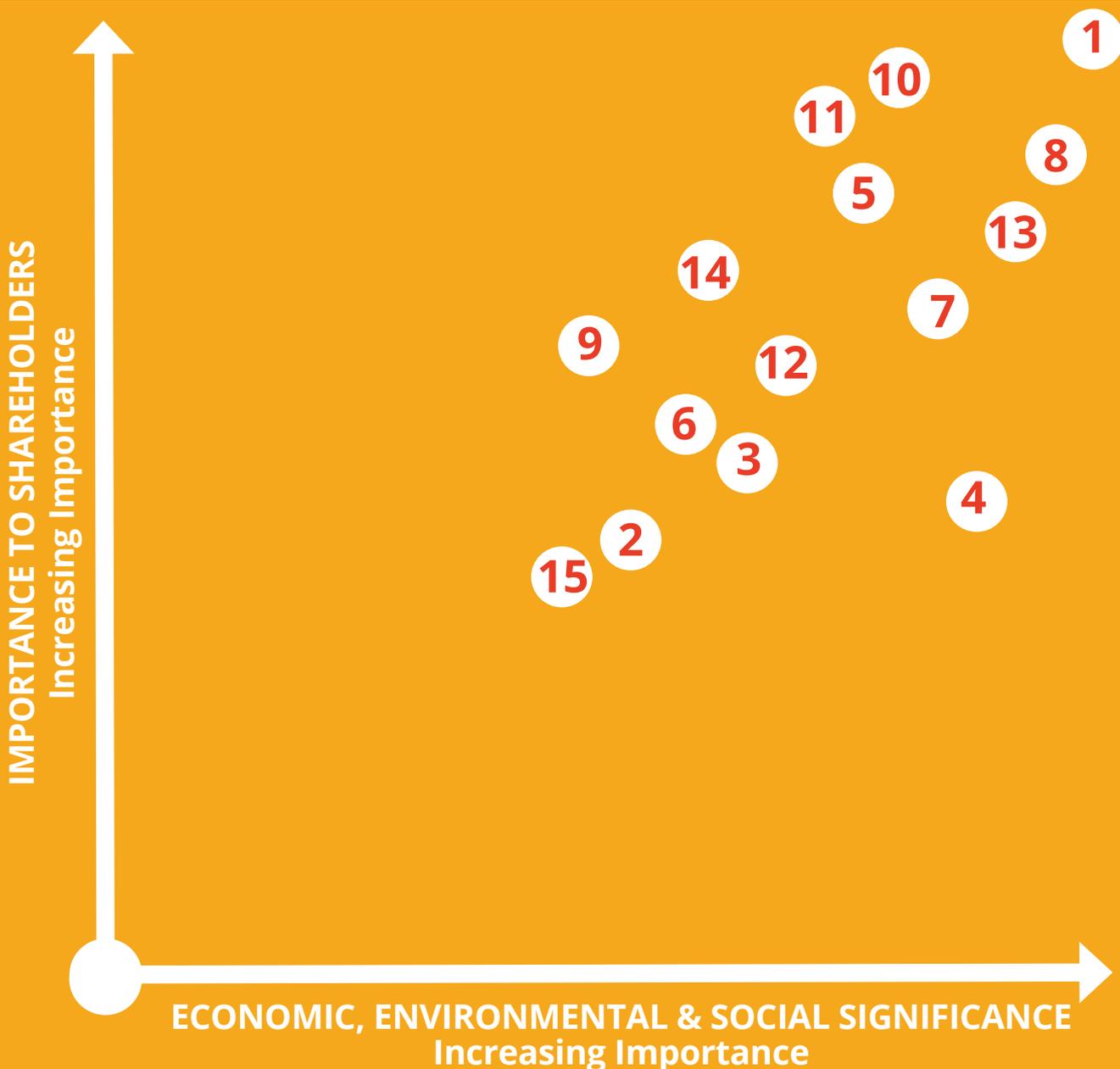
1. Economic Performance
2. Procurement Practices
3. Anti-Corruption
4. Anti-Competitive Behavior

ENVIRONMENTAL

5. Environmental Compliance
6. Supplier Environmental Assessment

SOCIAL

7. Employment
8. Occupational Health & Safety
9. Training & Education
10. Diversity & Equal Opportunity
11. Non-Discrimination
12. Local Communities
13. Customer Health & Safety
14. Customer Privacy
15. Socioeconomic Compliance



RESTATEMENTS OF INFORMATION (102-48)

None.

CHANGES IN REPORTING (102-49)

None.

REPORTING PERIOD (102-50)

Unless otherwise indicated, this Sustainability Report covers January 1, 2019, through December 31, 2019, our last completed fiscal year as of the date of this report.

DATE OF MOST RECENT REPORT (102-51)

December 2019

REPORTING CYCLE (102-52)

Annual

CONTACT POINT FOR QUESTIONS REGARDING THE REPORT (102-53)

Readers can send feedback, comments or questions regarding our sustainability plans and progress to our Environmental Compliance Officer at sustainability@spplus.com.

CLAIMS OF REPORTING IN ACCORDANCE WITH THE GRI STANDARDS (102-54)

This report has been prepared in accordance with the GRI Standards: Core option.

GRI CONTEXT INDEX (102-55)

See Pages 40-41.

EXTERNAL ASSURANCE (102-56)

SP+ has not sought external assurance with respect to its 2019 Corporate Sustainability Report.

ECONOMIC DISCLOSURES

& MANAGEMENT APPROACH

MANAGEMENT APPROACH (103)

SP+ recognizes that climate change not only poses serious threats to communities in the form of natural disasters such as devastating floods, droughts and storms, but also impacts businesses operating in the affected communities. We acknowledge that climate change poses meaningful risks to the economy, while battling climate change may bring new opportunities for our business. Our management team regularly reviews the risks facing our business, including those related to climate change, and determines the appropriateness of established and proposed mitigation measures. In addition, each Corporate Department has a Business Continuity Plan to serve as a guide.

DIRECT ECONOMIC VALUE GENERATED AND DISTRIBUTED (201-1)

Financial information can be found in SP+'s Annual Report on Form 10-K.

FINANCIAL IMPLICATIONS AND OTHER RISKS AND OPPORTUNITIES DUE TO CLIMATE CHANGE (201-2)

Our operations are subject to various federal, state and/or local laws regulating discharge of materials into the environment or otherwise relating to the protection of the environment, such as discharge into soil, water, and air, and the generation, handling, storage, transportation, and disposal of waste and hazardous substances. These laws generally have the effect of increasing costs and potential liabilities associated with the conduct of our operations. In addition, from time to time, we are involved in environmental matters at certain of our locations or in connection with our operations. Historically, the cost of complying with environmental laws or resolving environmental issues relating to United States locations or operations has not had a material adverse effect on our financial position, results of operations, or cash flows.

The table on the next page summarizes climate change risks and opportunities identified and managed by SP+.

+ Risks & Opportunities Related to Climate Change

RISKS						
PHYSICAL RISK		REGULATORY RISK		OTHER RISKS		
Hot summers and lower rainfall.	Increase in unforeseen extreme weather phenomena, such as hurricanes, floods and heavy snowfall in the winter.	More stringent legislation, new requirements, and regulations impacting parking facilities could add additional costs; shortcomings in expertise or inattention to the rapid development of environmental legislation and regulations.	Increase in taxes, fees and other regulatory burdens related to the energy efficiency of facilities, emissions or waste management could indirectly affect SP+ due to client budgetary constraints.	Availability of new construction products and solutions and technical and usability challenges.	Failures in reaching and communicating environmental objectives.	Decreasing popularity of car use resulting from environmental awareness. environmental awareness.
Impacts						
Increase in maintenance costs and fees.	Quality deviations in the maintenance of parking facilities, increase in maintenance costs and fees, damage to properties causing increased costs and/or loss of revenues.	Additional operational costs; impairing share price.	Increase in maintenance costs and fees and reduced demand for services.	Unforeseen problems in design, development and property use and maintenance due to construction methods.	Loss of clients and negative reputation impairing the share price.	Reduced demand for services leading to lower revenues.
Management Measures						
Cost monitoring.	Property insurance, reliable outdoor maintenance partner, quality criteria and setting targets that support customer satisfaction in partnership contracts, anticipatory budgeting.	Management measures: Legislation follow-up, updating expertise, careful selection of partners.	Seeking energy-saving solutions, use of renewable energy sources, anticipatory budgeting.	Innovative development cooperation, procurement, expertise and training.		Supporting alternative transportation methods; cooperation in the planning of public transport.

OPPORTUNITIES						
PHYSICAL OPPORTUNITIES		REGULATORY OPPORTUNITIES		OTHER OPPORTUNITIES		
Increase in maintenance costs and fees.	Temperate winters.	Prohibit products that contain harmful substances and waste energy.	Increase in transparent Corporate Social Responsibility reporting.	Clients and customers looking to understand processes and the importance of fostering sustainability.	Increasing interests in ecological footprint management, efficiency and operating costs with a green image.	Closer cooperation with customer companies producing sustainable technology.
Impacts						
Improvement in the profitability of using renewable energy sources.	Lower energy consumption and maintenance costs.	Development of consumption, emissions, and waste in a more ecological direction.	Increasing comparability of companies.	Gain market share by offering sustainable services, helping clients reduce environmental impact, increasing energy efficiency and performance, encouraging alternative mobility options and strengthening community relationships.	Increasing added value and competitive edge from selling green services and environmental labels.	Improving customer loyalty and growth becoming easier.

DEFINED BENEFIT PLAN OBLIGATIONS AND OTHER RETIREMENT PLANS (201-3)

+ Plan Liabilities

A description of Plan Liabilities can be found in Note 15, Benefit Plans, of the SP+ 2019 financial statements set forth in our Form 10-K filed on February 27, 2020.

+ 401(k) Eligibility

Our 401(k) Plan is available to employees who are at least 21 years of age and have worked 1,000 hours at SP+.

+ Company Match

SP+ contributes an amount in cash or other property as a company match equal to 50% of the first 6% of contributions as they occur. The number of participants varies during the year.

+ SP+ Employee Benefits

SP+ offers a comprehensive package of benefits to meet the varied needs of our full-time employees. The benefits offered include medical, dental, vision, life and disability insurance as well as a 401(k) plan.

FINANCIAL ASSISTANCE RECEIVED FROM GOVERNMENT (201-4)

SP+ does not receive significant financial assistance from any host government.

PROPORTION OF SPENDING ON LOCAL SUPPLIERS (204-1)

In 2019, SP+ continued to work with local networks of strategically positioned suppliers and vendors to distribute products and deliver services to our urban locations and airports.

COMMUNICATION AND TRAINING ABOUT ANTI-CORRUPTION POLICIES AND PROCEDURES (205-2)

SP+ requires all employees to take an annual class covering our current Code of Business Conduct, which is reviewed and updated periodically.

LEGAL ACTIONS FOR ANTI-COMPETITIVE BEHAVIOR, ANTI-TRUST AND MONOPOLY PRACTICES (206-1)

SP+ was not involved in any legal actions for anti-competitive behavior, anti-trust or monopoly practices in 2019.

ENVIRONMENTAL STANDARDS

& MANAGEMENT APPROACH

MANAGEMENT APPROACH/POLICY STATEMENT (103)

Corporate social responsibility is part of the foundation of a successful and respected company. An increasingly important aspect of this responsibility is stewardship of the planet on which we live. One element of such stewardship is sensitivity to issues that impact the environment as well as the health and well-being of our customers and employees. SP+ takes environmental protection seriously and we believe it should be a priority in everything we do.

Keeping our garages clean is an important part of our service to our clients and customers, but pressure washing and power scrubbing garages, as well as car washing activities, can result in motor oil, fuel, antifreeze and other regulated substances to accidentally enter storm drains. The Federal Clean Water Act of 1977 and other federal, state, and local laws were enacted to protect surface water from pollutants, and SP+ is leading the way to prevent this kind of pollution in order to protect our environment.

Although we are not a carbon intensive company, SP+ takes environmental protection seriously and believes environmental compliance should be a priority in all of its activities. We have undertaken initiatives in employee training, enforcement and the development of contracting procedures as part of our corporate responsibility and environmental compliance programs.

+ Employee Training

Through SP+ University, an extensive employee training manual has been developed to raise employees' environmental awareness and to train employees to comply with environmental laws, specifically those concerning water pollution. The training materials are available through SP+ University and form an integral part of SP+'s environmental policies.

After participating in the SP+ University training course, employees should be able to:

- + Identify his or her Corporate Responsibility
- + Navigate and reference the EPA Clean Act of 1977
- + Identify and discuss local laws and regulations
- + Discuss how his or her location(s) can comply with environmental laws
- + Discuss the requirements for dry sweeping
- + Discuss the requirements for power washing
- + Discuss and demonstrate how to protect floor drains
- + Discuss and demonstrate how to reclaim waste water
- + Recognize a vendor/supplier or internal employee not in compliance with the EPA Clean Water Act of 1977 or local regulations

+ Enforcement

Enforcement of SP+'s environmental policies is achieved through the use of an Employee Call Line, the utilization of an Environmental Compliance Officer, and formal contracting procedures. All of these enforcement measures are made more effective by raising employees' environmental awareness through the Environmental Compliance Training Program previously described.

+ Employee Hotline

SP+ employees may report environmental violations or concerns through the "Employee Hotline." With knowledge developed through participation in SP+ University's Compliance Training Program, an employee should be able to recognize when a fellow employee or a vendor is not acting in compliance with the Clean Water Act or similar laws, and the hotline serves as a means of reporting such non-compliance.

The employee utilizing the Employee Hotline may choose to provide his or her name or remain anonymous. The Employee Hotline may be accessed through the internet as well.

All Employee Hotline reports are handled by an outside company, which communicates the reported information to SP+. The Employee Hotline notification, which is posted at all staffed locations, states that an investigation of any allegations reported will be conducted by SP+ and appropriate action, if necessary, will be taken.

+ Environmental Compliance Officer

SP+ has designated an Environmental Compliance Officer (ECO) who is responsible for:

- Development and dissemination of our environmental policies.
- Development of standards for hiring vendors/suppliers engaged in environmentally sensitive activities on behalf of SP+.
- Development of standard forms of power washing, sweeping and car washing contracts.
- Acting as a resource for SP+ University's Environmental Compliance Training Program.
- Acting as a resource for addressing Employee Call Line inquiries concerning environmental matters.

+ Contracting Procedures

SP+ enforces environmental compliance through its contracting procedures as previously described below.

+ Contracting Procedures

There are two general types of contracts where the disposal of wash water and other Clean Water Act concerns are especially relevant. The first type of contract is where SP+'s personnel directly provide power washing, sweeping or car washing services for clients. The other type of contract is where SP+ contracts with third party vendors to provide power washing, sweeping or car washing services for clients.

- + SP+ Provided Cleaning Services
 - Compliance is Mandatory: SP+ must comply with all applicable environmental laws.
 - Environmental Procedures Manual: Each SP+ regional office is required to retain local environmental consultants to determine all applicable environmental compliance requirements to be retained in an Environmental Procedures Manual (“EPM”).
 - Best Practices: SP+’s personnel are required to become familiar with (i) applicable EPMs and their recommendations, and (ii) their facilities' structure and mechanics, including plumbing.
 - Capital Expenditures: In addition to standard capital expenditures approvals, acquisition of all cleaning equipment requires additional approval by the SP+ Legal Department.
 - Contracting with Clients: Purchase order or simple contract is permitted; however, execution requires an EPM and SP+ must comply with all its recommendations.
- + Third-Party Vendor Provided Cleaning Services
 - SP+ Forms Are Mandatory: SP+’s form contracts must be used with all third-party vendors.
 - Legal Department Prepares Contracts: Fully executed copies of all contracts must be maintained by the Legal Department.
 - Accounts Payable: No third-party vendor contract will be paid unless Accounts Payable confirms that the Legal Department has a copy of the applicable fully executed contract.
 - Finding Vendors: Third-party vendors must sign SP+’s form cleaning contract, perform the complete scope of services, obtain the necessary permits and insurance, and possess the equipment necessary to perform the work in accordance with the EPM.
 - Oversight: Local SP+ personnel are responsible for general oversight of the vendor to assure that the vendor performs the work in compliance with the contract, permits and environmental laws.

NON-COMPLIANCE WITH ENVIRONMENTAL LAWS AND REGULATIONS (307-1)

Disclosure relating to regulatory environment and environmental compliance can be found in the company’s Annual Report on Form 10-K for the year ended December 31, 2019.

NEW SUPPLIERS SCREENED USING ENVIRONMENTAL CRITERIA (308-1)

SP+ uses third-party vendors and suppliers to provide cleaning services at certain parking facilities. Third-party vendors must sign SP+'s form cleaning contract or an approved form of contract, perform the complete scope of services, obtain the necessary permits and insurance, and possess the equipment necessary to perform the work in accordance with SP+'s Environmental Procedures Manual, which is modified by professional consultants on a regional basis to ensure federal as well as regional, state and local laws are all addressed. Local SP+ personnel are responsible for general oversight of the vendor, with the goal of assuring that the vendor performs the work in compliance with the contract,

SOCIAL STANDARDS

& MANAGEMENT APPROACH



EMPLOYMENT



OCCUPATIONAL HEALTH & SAFETY



TRAINING & EDUCATION



DIVERSITY & EQUAL OPPORTUNITY



LOCAL COMMUNITIES



CUSTOMER HEALTH & SAFETY



EMPLOYMENT

MANAGEMENT APPROACH (103)

We aim to create a safe and engaging work environment where employees are offered relevant training, competitive compensation, and compelling and equal employment opportunities designed to help people succeed as contributing members of the communities we serve.

BENEFITS PROVIDED TO FULL-TIME EMPLOYEES NOT PROVIDED TO TEMPORARY OR PART-TIME EMPLOYEES (401-2)

Health care benefits are provided to all full-time employees as defined under the Affordable Care Act. Additionally, full-time employees receive ancillary benefits such as life and disability coverage.



OCCUPATIONAL HEALTH & SAFETY

TYPES OF INJURY AND RATES OF INJURY, OCCUPATIONAL DISEASES, LOST DAYS, AND ABSENTEEISM, AND NUMBER OF WORK-RELATED FATALITIES (403-2)

SP+ is committed to maintaining safe and healthy working conditions. Because safety is the responsibility of everyone, each employee is expected to take all safety and health policies seriously and help enforce these policies within the workplace. SP+ had no work-related fatalities in 2019.



TRAINING & EDUCATION

AVERAGE HOURS OF TRAINING PER YEAR PER EMPLOYEE (404-1)

All employees including management are required to complete annual fundamentals training that includes approximately six hours of content. This content covers our Code of Business Conduct, Information Security, Preventing Harassment and Discrimination, Preventing Sexual Harassment and Safety Topics. More than 7,100 new hires completed mandatory new-hire training, which contains about eight hours of content including Orientation, Code of Business Conduct, First Observer, Information Security, Environmental, Preventing Harassment and Discrimination, Safety and Customer Service. The Manager in Training Program and Hospitality Leadership Academy are multi-day, instructor-led events attended by 163 managers in 2019.

Additionally, nearly 500 employees completed New Hire Maintenance Fundamentals. New Managers at all levels were required to complete Manager Foundations e-learning. Courses include: Discipline Policies and Procedures, Interview and Hiring and Absence and Leave Management. The New Manager Program and Hospitality Leadership Academy are multi-day, instructor-led events attended by more than 200 managers in 2019.

PROGRAMS FOR UPGRADING EMPLOYEE SKILLS AND TRANSITION ASSISTANCE PROGRAMS (404-2)

SP+ seeks to create an inclusive and supportive environment in which employees are treated with dignity and respect, and where individuals can grow professionally based upon the quality of their contributions and competencies.

We have created learning and leadership programs for individuals to refine their skills and build new ones. We believe that by investing in the future of our people we are investing in the future of our company.

Our dedication to the long-term success of our employees is the foundation of our training philosophy. We believe that every employee should be given the tools and skills necessary to be successful in their current position and have access to the necessary tools to prepare them for an advanced career within SP+. Our training is designed and developed to ensure our staff achieves a degree of mastery in each position within our organization to ensure their long-term success.

+ Mentoring

Our Mentoring Program pairs mentees with mentors in order to help them develop professional skills, network, and advance in their careers.

+ SP+ University

SP+ University is the face of our training department offering access to job specific curricula, course content, materials, and reporting. SP+ University is web-based and gives our employees access to training 24/7.



We have found that the wide array of skills that we require—from technical skills such as accounting procedures and computer efficiency, to management skills such as employee development, customer service proficiency, and the ability to successfully delegate and supervise others—necessitates the use of several training methodologies. We use video-based classroom sessions, self-directed learning packages, and computer-based training programs to form a comprehensive, effective program that provides management employees with the tools they need to successfully perform specific job responsibilities.

+ Corporate Compliance Courses & Policies

COURSES TO BE COMPLETED WITHIN THE FIRST 30 TO 60 DAYS OF EMPLOYMENT

- + Non-Harassment and Diversity*
- + Robbery Procedures*
- + Heat Illness*
- + Motor Vehicle Safety**

*within first 30 days of employment
**within first 60 days of employment

COURSES TO BE COMPLETED WITHIN THE FIRST TWO WEEKS OF EMPLOYMENT

- + Code of Business Conduct
- + Information Security Awareness
- + Sexual Harassment Prevention
- + First Observer
- + Introduction to Safety
- + Blood-borne Pathogens
- + Hazard Communication
- + Environmental Compliance & Protection

PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEWS (404-3)

SP+ is committed to fostering an environment in which each employee and manager builds a trusting and respectful relationship, in which feedback and coaching are candid and frequent; opportunities for development that align with the employee's goals, strengths, career interests are provided; and outstanding performance, high potential and great leadership are rewarded.

A strong employee-to-manager relationship is essential to SP+'s performance and development process. Constructive, friendly, two-way conversations about performance, development and career growth are at the center of this relationship, with more than 90% of our non-union employees participating in our annual performance review process.



DIVERSITY & EQUAL OPPORTUNITY

DIVERSITY OF GOVERNANCE BODIES & EMPLOYEES (405-1)

As of December 31, 2019:

	MALE	FEMALE	AGE <30	AGE 30-50	AGE >50	MINORITY
Board	66.7%	33.3%	0%	0%	100%	16.7%
Service	70.4%	29.6%	37.2%	32.2%	30.6%	70.0%
Staff/Management	63.7%	36.3%	21.7%	46.5%	31.8%	60.1%

+ Commitment to Diversity and Equal Employment Opportunity

SP+ is an equal opportunity employer and does not discriminate against any individual in hiring, employment, or advancement because of race, color, national origin, gender, sexual orientation, religion, age, disability, veteran status, or any other legally protected status as defined by applicable laws. Employment opportunities at SP+ are based on non-discriminatory factors.

SP+ strongly supports the policies of the Americans with Disabilities Act and is committed to treating applicants and employees with disabilities in accordance with the requirements of the statute. SP+ seeks to give full and equal employment opportunities to all persons capable of performing successfully in our available positions. Where appropriate and possible, SP+ will make reasonable accommodations for the disability of an employee or applicant.

+ Discrimination & Harassment

It has been and continues to be SP+'s policy to (i) provide employees with a work environment free from discrimination and harassment, and (ii) prohibit discrimination and harassment of employees or customers in the workplace by any person, in any form. Discrimination and harassment can take many forms and can be based on a number of factors including a person's race, color, national origin, gender, sexual orientation, religion, age, disability veteran status, or any other legally protected status as defined by applicable laws. Discrimination and harassment can include offensive remarks, slurs or other verbal, written or inappropriate physical behavior based on a protected classification, such as the factor listed directly above.

SP+ has a zero-tolerance policy for any type of discrimination or harassment. Complaints of harassment or discrimination are taken seriously and are handled in a confidential manner to the extent possible. Disciplinary action up to and including termination will be taken against persons who engage in harassment or discrimination

or who retaliate against persons who either make good faith complaints or provide information related to complaints of harassment or discrimination.

SP+ employees are responsible to help assure that harassment and discrimination are avoided throughout the company. Additionally, each manager and supervisor has an affirmative duty to maintain a workplace free from discrimination and harassment. All SP+ employees are required to complete the Sexual Harassment Prevention training module made available at SP+ University on their first day of employment at the company.

SP+ is committed to following all applicable laws and does not tolerate discrimination or illegal labor practices, including the use of child labor, forced labor practices or human trafficking.

INCIDENTS OF DISCRIMINATION AND CORRECTIVE ACTION (406-1)

Professional behavior is expected and required of all SP+ employees. Our intent is to provide all employees with a workplace environment consistent with SP+'s core values. Accordingly, SP+ does not tolerate workplace discrimination or harassment based on age, ancestry, color, religious creed, request for / use of family and medical care leave, disability (mental or physical) including HIV and AIDS, marital status, medical, genetic information, military and veteran status, national origin, race, sex, gender, gender identity, gender expression, sexual orientation, or any other status protected by law.

+ Enforcement

To enforce the Code of Business Conduct and other compliance policies, and to protect against theft or fraud, SP+ has implemented a rigorous audit program. We actively monitor work activities and reserve the right to use surveillance. Anyone violating the Code of Business Conduct, or committing theft or fraud, is subject to disciplinary action including dismissal and, under the appropriate circumstances, criminal prosecution.

+ Reporting Violations

Should any SP+ employee become aware of violations, or just have a need to discuss work issues, we have several communication programs that our employees are encouraged to use. These include the following:

Open Communication Policy: SP+ believes in direct and open communication at all levels. Through effective and open dialogue, employee concerns can be identified and resolved. If our employees have a concern or problem that needs to be addressed, they are encouraged to discuss the issue with their supervisor, or if that is not appropriate under the circumstances, the next level of management.

Complaint Procedure: If employees are not satisfied with their supervisor's response, they communicate directly with a representative from the Chicago or Nashville Support Office or a regional Human Resources representative.

- + **Phone/Web Reporting:** Reports may also be made at any time through the SP+ Hotline (800-245-4714) or via the Internet at ethicsreportline.spplus.com. Employees can report concern without fear of retaliation.



LOCAL COMMUNITIES

OPERATIONS WITH LOCAL COMMUNITY ENGAGEMENT, IMPACT ASSESSMENTS AND DEVELOPMENT PROGRAMS (413-1)

Foremost, all SP+ HR recruiting for site level employees starts in the local communities in which that site is located. We want our people who work at client locations to be members of that community, if at all possible.

+ **SP+ in the Community**

As stewards of the communities we serve, we support a variety of causes and organizations with our time and resources. With SP+ employees located in offices and facilities across the nation, we recognize the importance of connecting with our local communities through outreach and charitable partnerships. Examples of our community and charitable organization outreach efforts include:

- + Children's Diagnostic & Treatment in Broward County
- + Ronald Macdonald House Charities in Atlanta
- + Mercy Housing Lakefront in Chicago
- + Meals for Military in San Francisco
- + Socks for Seniors in Nashville
- + Mittens for Detroit
- + Toys for Tots in Kansas City
- + Birthday in a Bag in Portland
- + Sarah's Circle in Chicago
- + Meals to Support First Responders in Orlando
- + Polar Plunge to benefit the Special Olympics in Washington, DC and Baltimore
- + American Heart Association's Heart Walk in Boston and Chicago

SP+ is committed to operating under a core set of fundamental values of Integrity, Excellence and Innovation. These values intertwine to provide a baseline mentality for how we operate, and nowhere is that more evident than in how we take responsibility for our activities that impact stakeholders and the environment.

In 2019, employees in each of our industry groups and supporting business functions engaged in philanthropic projects in their own communities throughout the enterprise. We celebrate these activities on our SP+ Website, Facebook and LinkedIn pages, and our internal communications hub, SPin.

+ **Awards & Recognition**

- + Accredited Parking Organization (APO) with Distinction
- + National Parking Association's Women In Parking Impact Award to Senior Vice President Nicole Hankins.



CUSTOMER HEALTH & SAFETY

INCIDENTS OF NON-COMPLIANCE CONCERNING THE HEALTH AND SAFETY IMPACTS OF PRODUCTS AND SERVICES (416-2)

Two OSHA citations were issued in 2019.



CUSTOMER PRIVACY

SUBSTANTIATED COMPLAINTS CONCERNING BREACHES OF CUSTOMER PRIVACY AND LOSSES OF CUSTOMER DATA (418-1)

In 2019, SP+ did not receive any substantiated complaints regarding breaches of customer privacy and losses of customer data, nor did we identify any leaks, thefts or loss of customer data.



SOCIOECONOMIC COMPLIANCE

NON-COMPLIANCE WITH LAWS AND REGULATIONS IN THE SOCIAL AND ECONOMIC AREA (419-1)

SP+ did not receive any significant fines or non-monetary sanctions in 2019.

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