



Team Mister,

Mister's values are "We Care, We Work Hard, and We Have Fun". These guide us in all the work we do for Mister, and represent who we are as an organization.

The Code of Conduct was created to help guide you and support our efforts to meet the highest ethical standards within our workplace. The Code is meant to help you understand and comply with all regulations applicable to our business, as well as help you understand Mister's own policies and procedures.

For that reason, it is important that you read and understand the Code of Conduct, and then speak up with any questions or concerns that you may have.

In particular, when confronted with a situation where you are unsure of what to do or how to move forward, always consider the following questions:

- Could doing this harm the reputation of Mister?
- Am I certain my actions are legal?
- Am I being fair and honest?
- How will my actions appear afterwards?
- How will the situation be described in a headline or on social media or TV?
- Will I sleep soundly tonight?
- What would I counsel a team member to do?

The Code, and Mister's Speaking Up Procedure, will provide you with information on where to go to report questions or concerns, or if you need help answering any of the above questions.

Thank you for all your hard work and everything you do to keep Mister an outstanding business and workplace.

A blue ink handwritten signature, appearing to be "John Lai", written in a cursive style.

Sincerely,

John Lai

PURPOSE

The success of Mister Car Wash, Inc., and its subsidiaries (“Mister” or the “Company”) has been built on a strong foundation of ethical values and trustworthy business practices that is reflected in our relationships with customers, suppliers, and each other. Our standards of business conduct as outlined in this Code of Conduct (“Code”) help employees, officers, and directors make principled decisions and avoid wrongdoing in the conduct of business.

This Code promotes:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships
- Full, fair, accurate, timely, and understandable disclosure in reports and documents we file with regulatory agencies and in our other public communications
- Compliance with applicable laws, rules, and regulations
- The prompt internal reporting of violations of this Code
- Accountability for adherence to this Code

SCOPE

This Code applies to every employee and officer working for Mister and each director serving on the Board of Directors. Mister team members are responsible for familiarizing themselves with all policies and procedures relevant to their job functions. Broadly speaking, the same high ethical standards apply to all employees, officers, and directors regardless of their job or level in the organization. In certain circumstances, this Code also applies to contractors and temporary team members.

DEFINITIONS

- **Board of Directors:** the Board of Directors of Mister Car Wash, Inc.
- **Compliance Officer:** the General Counsel and his or her designee
- **Principal financial officers:** the principal executive officer, principal financial officer, principal accounting officer, and controller, or persons performing similar functions

OVERVIEW

The principles described in this Code are general in nature and do not cover every situation that may arise. Use common sense and good judgment in applying this Code. This Code is not the exclusive source of guidance and information regarding the conduct of our business. You should consult applicable policies and procedures in specific areas as they apply, as outlined below.

Employee Responsibilities

You are expected to comply with both the letter and the spirit of this Code. This means you must understand and comply with all policies, laws, and regulations that apply to your job, even if you feel pressured to do otherwise.

Periodically, you may be asked to provide a written certification that you reviewed and understand this Code, comply with its standards, and are not personally aware of any violations of the Code by others. This certification is your pledge to live up to this Code and its expectations and to promptly raise concerns about any situation that you think may violate the Code. Anyone who violates this Code puts themselves, fellow employees, and Mister at risk and is subject to disciplinary action up to and including termination of employment.

If you have any questions about applying this Code, it is your responsibility to seek guidance. In most cases, your manager is in the best position to address any question or concern about the Code or a potential Code violation. However, if you are not comfortable speaking with your manager, or you are not satisfied with your manager's response, it is important to speak up and report, with as much detail as possible, to any one or more of the following, as appropriate:

HR Helpline

- Phone: 844-529-7392
- Email: HRhelp@mistercarwash.com

Compliance Officer

- Email: EthicsCompliance@mistercarwash.com
- Mail: 222 E. 5th St., Tucson, AZ 85705

EthicsPoint® Hotline

(toll free, 24 hours a day, 7 days a week)

- Mobile: mistercarwashmobile.ethicspoint.com
- Online: mistercarwash.ethicspoint.com
- Phone: 844-988-1683

Anyone who reports in good faith a Code violation or concern will not be subject to harassment, retaliatory or disciplinary action or to any other adverse employment consequences. If you think you are being retaliated against, or that an investigation is being conducted inappropriately, you should report it immediately as outlined above.

For more information on reporting violations or concerns, and the investigation process, see *Speaking Up Procedure* [GRC.1102.1-MCW-PRC].

Manager Responsibilities

All Mister leaders must show a commitment to our values through their actions. They also must promote an environment where compliance is expected and ethical behavior is the norm. You should never ask an employee, and you should never be asked by a manager, to break the law or go against the Company's values, policies, and procedures.

Making Ethical Decisions

Recognizing ethical issues and doing the right thing in all Mister business activities is your responsibility. When engaging in business activities for Mister, consider the following:

- What feels right or wrong about the planned action?
- Is the planned action consistent with the Code and Mister's policies and procedures?
- How will the planned action appear to your manager, senior management, or the general public?
- Would another person's input help to evaluate the planned action?

Disciplinary Measures

Violations of this Code will not be tolerated. Any employee, officer, or director who violates this Code will be subject to appropriate discipline, which may include, for an employee or officer, termination of employment, or, for a director, a request that such director resign from the Board of Directors.

Additionally, employees, officers, and directors who violate the law or this Code may expose themselves to substantial civil damages, criminal fines, and prison terms. Mister may also face substantial fines and penalties and may incur damage to its reputation and standing in the community.

Waivers of the Code

Any waiver of this Code for our directors, executive officers, or other principal financial officers may be made only by our Board of Directors or a duly authorized committee of the Board of Directors and will be disclosed to the public as required by law or the rules of the stock exchange where our common stock is listed, when applicable.

Waivers of this Code for other employees may be made only by the Compliance Officer or, if for the Compliance Officer, by the Chief Financial Officer and will be reported to our Board of Directors and/or Audit Committee as necessary or advisable.

WE CARE ABOUT OUR EMPLOYEES

Non-Discrimination and Prohibited Harassment

Each of us is responsible for creating a culture of trust and respect that promotes a positive work environment. This means treating one another with fairness and courtesy in all workplace interactions. We are committed to the principles of equal employment opportunity, inclusion, and respect. We prohibit discrimination in employment, employment-related decisions, and business dealings on the basis of race, color, ancestry, age, sex, sexual orientation, religion, disability, ethnicity, national origin, veteran status, marital status, pregnancy, or any other status protected by law or local policy. Harassing conduct in the workplace is prohibited regardless of whether it is welcome or unwelcome

and regardless of whether the individuals involved are of the same or different sex, sexual orientation, race, or other status. Our goal is to provide an environment free of discrimination and harassment to our team members, customers, and suppliers.

Mister believes diversity and inclusivity make our teams and Mister better. We believe that we best serve and enrich our own culture through the diverse skills, experiences, and backgrounds that each of us brings to the company. This is why Mister maintains a safe and inclusive work environment where all dimensions of difference are valued and respected. We want everyone to feel welcome and able to be their authentic self to create value and drive growth. All employment-related decisions must be based on company needs, job requirements, and individual qualifications. Always take full advantage of what our team members have to offer; listen and be inclusive.

Mister prohibits retaliation and will not terminate, demote, or otherwise discriminate against associates for reporting concerns. See *Equal Employment Opportunity Policy* [HR.3400-MCW-POL] for more information.

Employee Privacy

Mister respects the confidentiality of employees' personal information, including medical and personnel records. Access to personal information is only authorized when there is a legitimate and lawful reason, and access is only granted to appropriate personnel. Requests for confidential employee information from anyone outside Mister must always be approved in accordance with Mister's policies. See *Employee/Applicant Privacy Notice* [GRC.1100.2-MCW-PRC] for more information.

It is important to remember, however, that you should have no expectation of privacy with regard to ordinary workplace communication or any personal property brought to Mister premises or used for Mister business.

Workplace Nonviolence

Mister strives to provide a working environment that is healthy and safe. We will not tolerate acts or threats of violence, including extreme or inappropriate verbal or physical threats, intimidation, harassment, and/or coercion. Violence or threats of violence are strictly prohibited and, if confirmed, will be grounds for immediate termination.

Behavior that threatens the safety of people or property, or has the potential to become violent, should be immediately reported to your manager, Loss Prevention, HRBP, or the HR Helpline. See *Workplace Violence Prevention Policy* [GRC.1406-MCW-POL] for more information.

Drug- and Alcohol-Free Workplace

Mister strives to maintain a workplace that is free from illegal use, possession, sale, or distribution of alcohol or controlled substances. Legal or illegal substances shall not be used

in a manner that impairs a person's performance of assigned tasks. See *Drug- & Alcohol-Free Workplace Policy* [HR.3401-MCW-POL] for more information.

Commitment to Health and Safety

All managers are responsible for ensuring proper safety and health conditions for employees, customers, and visitors to Company premises. Senior management is committed to maintaining industry standards in all areas of employee safety and health, including industrial hygiene and ergonomics. To support this commitment, employees are responsible for observing all safety and health rules, practices, and laws that apply to their jobs and taking precautions necessary to protect themselves, their co-workers, customers, and visitors. Employees are also responsible for immediately reporting accidents, injuries, occupational illnesses, and unsafe practices or conditions to their manager.

Commitment to Wage/Pay Accuracy

We are committed to following all applicable wage and hour laws and regulations. Anyone paid based on hours worked must report and record all time worked accurately in accordance with applicable law.

WE CARE ABOUT OUR BUSINESS

Confidential Information

As an employee, you may learn information about Mister that is confidential and proprietary and/or not yet ready to be released to the general public. If you have received or have access to confidential and proprietary information, you should take care to keep this information confidential unless and until that information is released to the public through approved channels. See *Corporate Disclosure Policy* [GRC.1104-MCW-POL] and *Insider Trading Compliance Policy* [GRC.1105-MCW-POL] for more information.

Records Management

Our Company records consist of all forms of information created or received by Mister, whether originals or copies. These records contain evidence of actions and decisions and contain data and information critical to the continuity of our business. Company records are documents, files, or other information created received, or obtained by any Company employee by any means. Records are not specific to any particular format or media and may take many forms, including:

- Paper documents and files such as forms, reports, manuals, daily diaries, post-it notes, and correspondence
- Computer files such as spreadsheets, databases, and word-processing documents
- Electronic communications such as e-mail messages, instant messages, text messages, and phone or voicemail messages
- Application software database records

- Information in other formats such as videotape, audiotape, microfilm, digital images, and photographs

All records are the property of Mister and should be retained in accordance with applicable law. We are responsible for properly labeling and carefully handling confidential, sensitive, and proprietary information and securing it when not in use. Company records shall not be removed, destroyed, mutilated, damaged or disposed of, in whole or in part, unless they have been authorized for disposal. Company records that have been authorized for disposal shall be destroyed by means that guarantee secure and complete destruction.

Accurate Records

Accurate and reliable records are crucial to our business. We are committed to maintaining accurate Company records and accounts to ensure legal and ethical business practices and prevent fraudulent activities. We are responsible for helping ensure that the information we record, process, and analyze is accurate and recorded in conformity to applicable legal or accounting principles. We must also ensure records are made secure and readily available to those with a need to know the information.

All Company records must be complete, accurate, and reliable in all material respects. There is never a reason to make false or misleading entries. Undisclosed or unrecorded funds, payments, or receipts are inconsistent with our business practices and are prohibited.

Accuracy of Financial Reports and Other Public Communications

As a public company, we are subject to various securities laws, regulations, and reporting obligations. Both federal law and our policies require the disclosure of accurate and complete information regarding Mister's business, financial condition, and results of operations. Inaccurate, incomplete, or untimely reporting will not be tolerated and can severely damage Mister and result in legal liability.

Mister's principal financial officers and other employees working in the Finance and Accounting Department have a special responsibility to ensure all financial disclosures are full, fair, accurate, timely, and understandable. These employees must understand and strictly comply with generally accepted accounting principles and all standards, laws, and regulations for accounting and financial reporting of transactions, estimates, and forecasts.

Customer/Third-Party Data

Mister respects the privacy of its employees, business partners, and customers. We must handle personal data responsibly and in compliance with all applicable privacy laws and Company policies (including our records retention requirements).

Employees who handle the personal data of others must:

- Act in accordance with applicable laws and any relevant contractual obligations
- Collect, use, and process such information only for legitimate business purposes

- Limit access to the information to those who have a legitimate business purpose for seeing the information
- Take care to prevent unauthorized disclosure

See *Consumer Privacy Notice* [GRC.1100.1-MCW-PRC] and *Acceptable Use Policy* [IT.4000-MCW-POL] for more information.

Intellectual Property Protection

Intellectual property refers to creations of the human mind that are protected by various national laws and international treaties. Intellectual property includes copyrights, patents, trademarks, tradenames, trade secrets, design rights, logos, expertise, and other intangible industrial or commercial property. We must protect and, when appropriate, enforce our intellectual property rights. We also respect the intellectual property belonging to third parties. It is our policy to not knowingly infringe upon the intellectual property rights of others. To ensure that Mister receives the benefit of work done by outside consultants, it is essential that an appropriate assignment agreement be in place before any work begins.

Security/Proper Use of Company Property

Our assets are the resources we use to conduct our business. You should use Mister assets only for legitimate Company business and appropriately safeguard them, including against theft, loss, waste, abuse, and cyber-related attack. By protecting our assets, we protect our competitive advantage in the marketplace.

It is not permitted to use Mister information technology and communications systems (including email, instant messaging, the Internet, or intranet) for activities that are harmful, unlawful, unethical, immoral, or otherwise contrary to this Code. See *Acceptable Use Policy* [IT.4000-MCW-POL] and *Password Policy* [IT.4205-MCW-POL] for more information.

Conflicts of Interest

Mister believes business decisions should be made with integrity and free from conflicts of interest. A conflict exists when your or a family member's personal, social, or financial interests, duties, obligations, or activities are or may be in conflict or incompatible with Mister's interests. Conflicts of interest expose our personal judgment and that of Mister to increased scrutiny and criticism and can undermine our credibility and the trust that others place in us. See *Conflicts of Interest Policy* [GRC.1111-MCW-POL] for more information.

Gifts/Entertainment

Modest gifts, favors, and entertainment are often used to strengthen business relationships. However, no gift, favor, or entertainment should be accepted or given if it obligates, or appears to obligate, the recipient, or if it might be perceived as an attempt to influence fair judgment.

In general, the following rules apply to giving or receiving any gift:

- Any business gifts given or received by a Mister employee must be reasonable in cost, quantity and frequency
- If you plan to give or accept a business gift of more than a nominal value, you must inform your manager
- Gifts of items that are marked with Mister promotional labeling are generally likely to be appropriate
- Giving or receiving money is always prohibited

When deciding whether to give or accept a gift, consider the following questions:

- Is the intent only to build a business relationship or offer normal courtesy, or is it to influence the recipient's objectivity in making a business decision?
- Is the gift modest and infrequent or could it place you (or the other party) under an obligation?
- Is the receipt of gift allowed by the recipient's organization?
- Would you be embarrassed if your manager, team members or anyone outside the Company became aware?

WE CARE ABOUT OUR COMMUNITY

Environmental/Health/Safety Commitment

We are committed to conducting business in an environmentally responsible manner and strive to improve our performance to benefit our employees, customers, communities, shareholders, and the environment. We use energy and natural resources wisely and efficiently and employ technology to minimize any risk of environmental impact.

Employees whose work involves environmental compliance must be completely familiar with applicable permits, laws, and regulations. However, all employees are responsible for making sure that Mister business is conducted in compliance with all applicable laws and in a way that is protective of the environment.

Public Communication

Mister places a high value on its credibility and reputation in the community. What is written or said about Mister in the news media and investment community directly impacts our reputation. Our policy is to provide timely, accurate, and complete information in response to public requests (from media, analysts, etc.) consistent with our obligations to maintain the confidentiality of competitive and proprietary information and prevent selective disclosure of market-sensitive financial data.

Mister has adopted guidelines to maintain the Company's credibility and reputation in the community, to maintain the confidentiality of competitive and proprietary information, and to prevent selective disclosure of market-sensitive financial data. See *Corporate Disclosure Guidelines* [GRC.1104.2-MCW-PRC] for more information.

Unless authorized, do not give the impression that you are speaking on behalf of Mister in any communication that may become public. This includes posts to online forums, social media sites, blogs, chat rooms, and bulletin boards. This applies also to comments to journalists about specific matters that relate to our businesses, as well as letters to the editor and endorsements of products or services. See *Social Media Policy* [HR.3404-MCW-POL] for more information.

Truth in Advertising/Marketing

It is our responsibility to accurately represent Mister and our products in our marketing, advertising and sales materials. Deliberately misleading messages, omissions of important facts or false claims about our products, individuals, competitors or their products, services, or employees are inconsistent with our values. Sometimes it is necessary to make comparisons between our products and our competitors. When we do, we will make factual and accurate statements that can be easily verified or reasonably relied upon.

Government Requests/Inspections

You are not required to disclose to Mister that any governmental or regulatory entity has contacted a team member regarding possible violation of any federal, state, or local law, rule, or regulation. You do not need the prior authorization of Mister to disclose to any governmental or regulatory entity information regarding possible violation of any federal, state, or local law, rule, or regulation, and you do not need to disclose to Mister that you have made such a disclosure.

Any information you provide to law enforcement or government officials must be completely honest and truthful. If you receive a subpoena related to Mister or your work, immediately contact the General Counsel. If you become aware of pending, imminent, or contemplated litigation or a government examination or investigation, you must immediately contact the General Counsel. You must also save all records and documents that may be relevant to the subpoena, litigation, or investigation, including any records that may otherwise be automatically destroyed or erased (such as e-mail, text messages, and voicemail messages).

Compliance with the Law

As members of the Mister team, we all have a personal responsibility to uphold and ensure the letter and spirit of this Code in our individual roles, every single day. It is important that you are aware of, and never intentionally violate, relevant laws and regulations. Violating relevant laws, regulations, or this Code, or encouraging others to do so, exposes Mister to risk, including risk to its reputation, and therefore may result in disciplinary action up to and including termination of employment. You should understand that violations of laws or regulations may also result in legal proceedings and penalties, including, in some circumstances, civil and criminal penalties that could affect you personally in addition to a

risk of adverse consequences to Mister. You should also be alert to changes in the law or new requirements that may affect Mister's business.

Compliance with Insider Trading Laws

Mister's employees, officers, and directors are prohibited from trading in the securities of Mister while in possession of material non-public information about the Company. In addition, Mister employees, officers, and directors are prohibited from recommending, "tipping", or suggesting that anyone else buy or sell Mister's securities on the basis of material non-public information. Employees, officers, and directors who obtain material non-public information about another company in the course of their duties are prohibited from trading in the securities of the other company while in possession of such information or "tipping" others to trade on the basis of such information. See *Insider Trading Compliance Policy* [GRC.1105-MCW-POL] for more information.

Political Involvement

Mister encourages personal participation in the political process in a manner consistent with all relevant laws. You may support the political process through personal contributions or by volunteering your personal time to the candidates or organizations of your choice. Your job will not be affected by your personal political views or your choice in political contributions.

However, political activities must not be conducted on Company time or involve the use of any Company resources such as telephones, computers, or supplies. If you express a personal view in a public forum (such as in social media), do not use Mister letterhead or Company e-mail and do not reference your business address or title.

Most importantly, you may not make or commit to political contributions on behalf of Mister. Doing so would expose Mister to civil penalties.

Compliance with Antitrust Laws

Antitrust laws of the United States and other countries are designed to protect consumers and competitors against unfair business practices and to promote and preserve competition. Our policy is to compete vigorously and ethically while complying with all applicable antitrust, monopoly, competition, or cartel laws. Violations of antitrust laws may result in severe penalties against Mister and its employees, including potentially substantial fines and criminal sanctions. The following are examples that constitute violations of applicable antitrust laws and regulations, and must not be engaged in under circumstances:

- Any behavior that could be construed as an attempt to monopolize
- Agreements with competitors to fix prices or any other terms or conditions of sale
- Agreements with competitors to boycott specified suppliers or customers
- Agreements with competitors to allocate territories or markets

You are expected to maintain basic familiarity with the antitrust principles applicable to your activities, and you should also consult the Compliance Officer with any questions you may have concerning compliance with these laws.

Anti-Bribery

The United States and many other countries have laws that prohibit bribery, kickbacks, and other improper payments. A bribe is defined as directly or indirectly offering anything of value (e.g., gifts, money, or promises) to influence or induce action, or to secure an improper advantage. No Mister employee, officer, director, agent, or independent contractor acting on our behalf may offer or provide bribes or other improper benefits in order to obtain business or an unfair advantage.

Anti-Money Laundering

Money laundering is defined as the process of converting illegal proceeds so that funds are made to appear legitimate, and it is not limited to cash transactions. Complex commercial transactions may hide financing for criminal activity such as terrorism, illegal narcotics trade, bribery, and fraud. Involvement in such activities undermines our integrity, damages our reputation and can expose Mister and individuals to severe sanctions.

Mister forbids knowingly engaging in transactions that facilitate money laundering or result in unlawful diversion. We take affirmative steps to detect and prevent unacceptable or illegal forms of payment and financial transactions. We are committed to full compliance with anti-money laundering laws and will conduct business only with reputable parties involved in legitimate business activities and transactions.

CONCLUSION

This Code contains general guidelines for conducting the business of Mister consistent with the highest standards of business ethics. Mister expects all employees, officers, and directors to adhere to these standards. If you have any questions about them, please contact your manager or the Compliance Officer.

This Code, as applied to Mister's principal financial officers, shall be our "code of ethics" within the meaning of Section 406 of the Sarbanes-Oxley Act of 2002 and the rules promulgated thereunder.

This Code and the matters contained herein are neither a contract of employment nor a guarantee of continuing Mister policy. Mister reserves the right to amend, supplement, or discontinue this Code and the matters addressed herein without prior notice at any time.

REVIEW

This procedure will be reviewed and updated as necessary by the Board of Directors.

APPROVAL

Name, Title, and Signature	Date (YYYY-MM)
<i>Lisa Funk</i> Lisa Funk, General Counsel	2021-06

HISTORY

Version	Issue Date	Updated by	Revisions
V.1	2021-06	Lisa Funk	Document approved by Board of Directors 6/2/2021.