

CODE OF CONDUCT













4 Who We Are and What We Value

Our Code, Our Foundation
About the Code

Our Responsibilities
Making Good Decisions
Speaking Up

11 Our Team

Safety, Security, and Health Respectful Workplace Diversity and Inclusion

16 Our Company

Conflicts of Interest
Accurate Records and Accounts
Company Assets
Proprietary Information
and Intellectual Property
Data Privacy
Responsible Communication
Insider Trading

28 Our Customers

Product Quality and Safety Fair and Honest Competition Government Customers Global Trade

37 Our Suppliers

Interactions with Business Partners Bribery and Corruption The Exchange of Business Courtesies Human Rights

45 Our Communities

Environmental Protection Community Involvement Political Activities

49 Our Destination

50 Our Policies

51 Where to Go for Help











"If I were in a different vehicle, I am not sure anyone would have survived. Thank you for building such tough and rugged trucks." - Marine Colonel

AM General Teammates,

For more than a century, AM General has helped keep customers around the world moving. Our task is to produce the best products for our customers. We also have a collective understanding that our purpose is to serve those who serve to protect us. To achieve our task and purpose we must practice daily our core R.I.D.E. values. **R.I.D.E.** stands for **R**esponsive, **I**ntegrity, **D**ynamic, and **E**xcellence. While each are ingrained in every facet of how we conduct ourselves, AM General is not sustainable without **Integrity**. My expectation is that we do the right thing in everything we do, all the time.

Our Code of Conduct ("Code") personifies the R.I.D.E. values and provides a guide for your journey with us. It spells out what's expected of us as members of the AM General team. It's invaluable for navigating critical workplace topics, pointing to resources, and explaining how to handle everything we do with integrity and respect for our customers, our Company, and everyone with whom we work.

While our Code covers many of the topics with which we're confronted in the workplace, not every scenario may be spelled out. The Code, however, acts as a north star, and if you follow the letter of the Code, you will not go wrong. We are on this journey together and understanding and living by the Code will help protect and enhance AM General's reputation as an ethical company operating at the highest standard.

AM General has built a tremendous legacy, and we honor it when each of us upholds that commitment to integrity. There are no shortcuts on the battlefield. We must remember that every job at AM General matters and contributes to our customers' mission and success, so each of us has the responsibility to follow the Code. If you have a question about the Code or our policies, ask your supervisor or contact one of the resources listed in the Code.

Thank you for all you do for AM General and everyone we serve.

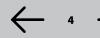
Jim Cannon

President & Chief Executive Officer









Who We Are and What We Value

We are one team dedicated to producing the best products for our customers. We have a collective understanding that at AM General our purpose is to serve those who serve to protect us.



OUR MISSION AND VISION

AM General develops and builds the specialized ground vehicle systems that will get you to and from your mission safely. Our innovative spirit delivers advanced, rugged, resilient, and dependable mobility solutions that will move you.

OUR CORE VALUES

We **R.I.D.E.** with Sgt. Smith!

We Are Responsive

Finding solutions, meeting requirements, and hearing the voice of the customer are what we're about.

We Have Integrity

Doing the right thing in everything we do!

We Are **D**ynamic

Developing and innovating products like lives depend on them, because they do!

We Exhibit Excellence

Operating at our absolute best because peak performance is always required in the field.







Our Code, **Our Foundation**

We strive to put the best of ourselves into every product we build. Our Code helps us build our Company the same way – on a solid foundation of excellence, accountability, and integrity.

In This Section

About the Code

Our Responsibilities

Making Good Decisions

Speaking Up





About the Code

Each day, somewhere in the world, someone is depending on AM General products and services to perform at the highest level. They can't afford to fail, and we won't let them down.



We understand the immense responsibility we have to our customers. For that reason, we serve them with a strong sense of pride in our products and a commitment to working ethically and in compliance with laws, rules, and regulations that apply to our business. We also recognize that these requirements can be complicated, and sometimes we need guidance.

That is why AM General has created this Code of Conduct – it's your best resource when ethical questions arise. Think of the Code as a roadmap, helping you navigate complex situations and find helpful resources along the way.

The Code can't answer every possible question you might have, but it will:

- Show you what's expected of you as an AM General employee
- Help you make decisions that align with our core values
- Help you interact with others respectfully and ethically
- Walk you through common ethical workplace situations
- Clarify key terms and how they apply to you
- Link you to Company policies and resources for more information

The Code is for all of us

Each of us has a responsibility to follow this Code, whether we're directors, officers, or fullor part-time employees of AM General. If we do any work on AM General's behalf, the Code applies to us – no matter what job we hold. That includes our consultants, suppliers, and other business partners – all are expected to share our commitment to the same high standards reflected in our Code. To ensure we all know what our obligations are, we will provide regular training on the Code, and we will conduct periodic compliance reviews to assess whether the Code is working as intended.

We take violations seriously

Our Code is the written expression of our long-standing commitment to integrity. Any violation, no matter how small, erodes the trust we have built with each other, our customers, and our Company. Anyone found to have violated our Code, policies, or the law can face serious disciplinary action, up to and including termination of employment. And if a law has been broken, both the offender and our Company could also face civil or criminal penalties.



Our Responsibilities

With every vehicle, engine, and component we produce, we put AM General's reputation on the line.



To protect our legacy and preserve the trust our customers place in us, we honor our responsibilities:



Leveraging our core values -

Keeping our core values top-of-mind and applying them to every action, interaction, and decision and following the laws and regulations that apply to our work



Seeking help and helping others -

Asking for guidance when it's unclear how a law or policy applies and sharing our knowledge with coworkers when they seem unsure



Speaking up – Watching for and **sharing concerns** if we ever see or suspect potential misconduct and cooperating in investigations

AM General managers have further responsibilities:



Creating a strong ethical culture -

Showing your team that integrity is your driving force by living our core values and talking about and following both the letter and spirit of our Code



Opening your door – Being available to your team when they need to share concerns and making sure they're comfortable doing so - confident that they'll be heard, and they won't face retaliation



Being proactive – Never turning a blind eye to misconduct - instead, staying alert for it and **speaking up** about it right away – before harm is done







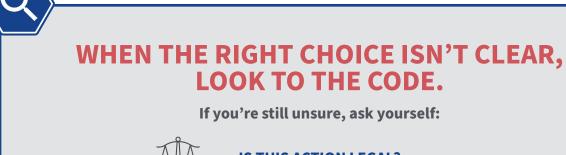


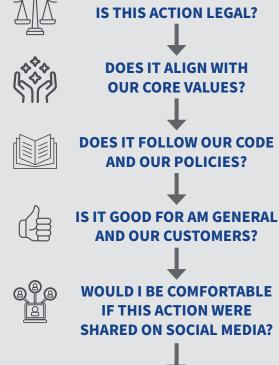
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Making Good Decisions

The choices we make at work matter more than you may think. Even the smallest decisions impact AM General. As a result, we must make sure they're good for our Company and our customers.







If you can answer "yes" to every question, the action is probably OK.

If there are any "no" or "maybe" answers, consider it a sign to stop and ask for help.









9



Speaking Up

As members of the AM General team, we recognize our duty to speak up whenever we have concerns about activity that could violate our Code, policies, or the law. Concerns like these can damage our Company and our customers' trust. Ignoring them is simply not an option.



Know your options

We know that discussing concerns isn't always easy, but it's critical that you do. It's also important that you feel comfortable and confident starting the conversation. That's why AM General offers several different ways to speak up:



Your direct supervisor or a member of senior management



Human Resources



Legal Department

Or, if you wish to remain anonymous, contact:



Ethics Hotline

Accessible by phone, the Ethics Hotline enables team members to share concerns 24 hours a day, seven days a week and is operated by an independent third-party provider. Anyone who calls the Ethics Hotline may do so anonymously. You can reach the hotline by phone:

1-800-344-6593



Department of Defense (DoD) Hotline

Alternatively, if you have questions or concerns about potential fraud, waste, or abuse involving AM General's interactions with our government customers, you may contact:

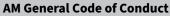
1-800-424-9098

NOTE: When reporting concerns, it's always best to identify yourself. This helps the Company conduct a more thorough investigation. But if you prefer to remain anonymous, we will do all we can to protect your confidentiality, in accordance with the law.



WHEN YOU SPEAK UP ...

- AM General will take your report seriously and respectfully when you've reported in good faith (meaning you have reported sincerely and haven't falsified any information).
- You will receive a Unique Report Key to check the status of your report or to answer any additional questions that arise.
- We will review your report thoroughly and promptly.
- If an investigation reveals a violation, we will take appropriate disciplinary action.



Speaking Up



Retaliation won't be tolerated

We understand you won't feel confident speaking up if you fear retaliation. For that reason, AM General takes a zero-tolerance stance on retaliation against anyone who shares a concern in good faith or cooperates with an investigation.

How do I recognize retaliation?

Retaliation can be any negative treatment, but it often looks like:

- Termination
- Demotion
- Reduced pay
- Exclusion

Any act of retaliation violates our Code, so **speak up** about it if it happens to you or someone else.

WHICH WAY?

I was going to report a concern, but a member of management urged me not to. What should I do?

Nobody at AM General, no matter his or her position, has the authority to ask you to violate our policies or our Code or to ignore misconduct by someone else. You should never ignore your concerns or fear retaliation. Remember that our Code, our policies, and the law apply equally to each of us, and we won't permit retaliation against you for speaking up.







Our unity is our strength. When we support each other, celebrate each other, and collaborate with integrity, we become a stronger team and a more successful company.

In This Section

Safety, Security, and Health

Respectful Workplace

Diversity and Inclusion













Safety, Security, and Health

At AM General, safety is a priority, both in our products and in our workplace. Ensuring a safe workplace is a responsibility we all share. We all contribute to a safe follow our policies, and look out for one another.



The Way We Work

We expect you to help keep our workplace safe, secure, and healthy by following all the policies and procedures we have in place. That includes:

- Using tools and equipment properly
- Completing required safety training
- Wearing personal protective equipment when required
- Following our policies to keep our facilities secure
- Watching for and speaking up about potential risks

It's also important that you come to work healthy and ready to work. Monitor your health and never attempt to work under the influence of alcohol, drugs (whether legal or illegal), or any substance that could impair your judgment or performance.

We also ensure that anyone who visits our facilities understands and complies with our safety requirements.

What about workplace violence?

AM General does not tolerate weapons in our workplace or in any of our facilities. We also prohibit threats of violence – with or without a weapon. Stay alert to what is going on around you, and never ignore potential signs of violence in our workplace. Notify the **Security (FSO) Office** or Human Resources immediately.



WHAT RISKS SHOULD I REPORT?

Report anything that could cause harm, such as:

- Malfunctioning equipment
- Unsafe facility conditions
- Safety rule violations
- Safety "shortcuts"
- Substance abuse
- A weapon at work
- Verbal or physical threats



POLICY TOOLBOX

Drug-Free Workplace and Work Force Policy

Pre-Employment Drug Screening

Health, Safety, Environmental and Sustainability Policy

Insider Threat Policy

Employee Assistance Program (EAP)

Weapon-Free Workplace and Workplace Violence Prevention Policy











Respectful Workplace

At the heart of any successful team is a shared sense of dignity and respect. When every decision and interaction we make is based on respect, it shows in our work and forms the foundation for AM General's success.



The Way We Work

We believe every employee should feel comfortable and safe in our workplace, never forced to endure intimidation, harassment, or bullying. This behavior violates our core values and damages our collaborative spirit. It won't be tolerated. Treat others the same way you would like to be treated – fairly and with respect.

If you experience harassment (whether it's visual, physical, or verbal in nature), or you see it happening to someone else, don't wait for it to happen again. **Speak up** about it and remember that AM General will not tolerate retaliation against you for sharing a good-faith concern.



WATCH FOR SEXUAL HARASSMENT

Sexual harassment is a form of harassment that can involve:

UNWELCOME PHYSICAL CONTACT OR SEXUAL SUGGESTIONS

DISPLAYING OR SHARING OF SEXUAL MATERIAL

MEMBERS OF THE SAME OR OPPOSITE SEX

FELLOW COLLEAGUES, CUSTOMERS, OR THIRD PARTIES

Watch for this behavior in others and in yourself. Be aware of how others might interpret the things you say and do.



COULD THIS BE HARASSMENT?

Behavior might be harassment if it involves:

- Unwanted physical contact
- Intimidating or degrading words or names
- Offensive remarks or jokes spoken or written in emails or on social media
- Physical gestures
- Sharing offensive materials
- Bullying or emotional abuse
- Sexual advances or requests



POLICY TOOLBOX

Sexual and Other Unlawful Harassment Policy

Equal Employment Opportunity Policy

Human Rights Policy

Open Door Policy









Diversity and Inclusion

Each employee plays a unique and important role at AM General. We're proud of the team we've built with a diversity of ideas, backgrounds, experiences, and perspectives.

Together, we will continue to work to strengthen our team each day by promoting an inclusive and welcoming environment.



The Way We Work

Developing AM General's products requires skill, experience, and innovative thinking – qualities on full display in our diverse workforce. We recognize and respect each person's unique contributions and perspectives and work to ensure that everyone has an equal chance to participate and succeed.

We expect every employee to support our efforts by being fair in our employment practices. If you make decisions affecting AM General employees or candidates, such as screening, hiring, firing, and promotions, follow equal employment laws and never allow discrimination to enter the process. If you believe discrimination is happening, **speak up** about it immediately.



NEVER base employment decisions on ...

Stereotypes or biases related to things like age, sex, race, color, religion, disability, national origin, veteran status, sexual orientation, gender identity, family status, citizenship status, genetic information, pregnancy, childbirth, or any other categories protected by federal, state, or local law.

ONLY base employment decisions on ...

Factors like job requirements, skills, qualifications, and performance.









Diversity and Inclusion



What does it mean to be inclusive?

It's all about seeking and welcoming new perspectives. When collaborating with others, be receptive to their viewpoints and respect their personal beliefs, cultures, and values. Also strive to make unbiased decisions, free of preconceived notions or personal assumptions.

WHICH WAY?

I feel like a job applicant was passed over due to his or her disability. But since this person isn't an employee, should I just let this go?

No, you shouldn't. We need to know about discrimination in our employment decision-making, no matter if it involves a current or prospective employee.



AM I MAKING UNBIASED DECISIONS?

Make sure you can agree with each of these statements:

- ✓ I'm recognizing the personal biases I may have.
- ✓ I'm avoiding "snap" judgments.
- ✓ I'm seeking input from new sources.
- ✓ I'm not minimizing anyone's contributions.



Equal Employment Opportunity Policy

Our Company

We take pride in our work and in the Company we're building. With every ethical action we take, we strengthen our foundation and our future.

In This Section

Conflicts of Interest

Accurate Records and Accounts

Company Assets

Proprietary Information and Intellectual Property

Data Privacy

Responsible Communication

Insider Trading



Conflicts of Interest

Each of us has interests and relationships outside of work, but we never allow them to undermine our Company or the decisions we make on its behalf.



The Way We Work

We always act in AM General's best interests and avoid situations that could compromise our judgment in the workplace, known as conflicts of interest. Even the appearance of a conflict could harm our reputation and the trust our customers place in us, so recognize and avoid these situations.

What do conflicts of interest look like?

Certain situations are more likely to lead to a conflict of interest:

OUTSIDE EMPLOYMENT: Accepting employment with or acting as a consultant for a competitor or any other organization that interferes with your ability to do your job at AM General or remain objective

PERSONAL RELATIONSHIPS: Supervising, hiring, or making employment decisions involving a family member or someone with whom you have a romantic relationship or giving business to a company owned by a family member

FINANCIAL INTERESTS: Owning or having a substantial investment in a supplier or any organization that does (or seeks to do) business with us

BUSINESS OPPORTUNITIES: Discovering an opportunity through your work at AM General but taking it for yourself

PERSONAL BENEFIT OR GAIN: Receiving improper personal gain because of your position with AM General

GIFTS OR OTHER OFFERS: Accepting improper **business courtesies** from suppliers or anyone who wants to do business with AM General

It's impossible to list every situation that could lead to a conflict. The most important thing is to consider how a situation could look to someone else. If it might look like a conflict, avoid it.

I think I have a conflict. What do I do?

Above all, think transparency. It's always best to be honest and open as soon as you think there may be a conflict. Disclose it right away to your supervisor and the **Legal Department** so we can manage it properly.



Conflicts of Interest



WHICH WAY?

My spouse just accepted a position at a company that is one of AM General's key suppliers. Since this situation involves my spouse and not me, do I need to disclose this to AM General?

Yes, you should. It's always best to let AM General know about situations like this. Similarly, your spouse should inform his or her employer. Both companies may be able to take proper action to address any potential conflicts and advise on how to proceed.



Gifts and Entertainment Policy



IS THIS A CONFLICT?

Conflicts can be hard to spot. Asking yourself some questions can help:



COULD I OR A FAMILY MEMBER BENEFIT FROM THIS SITUATION?



COULD IT INFLUENCE MY BUSINESS DECISIONS?





AM I CONCERNED THAT THIS MIGHT LOOK LIKE A CONFLICT?



Did you answer "yes" or "maybe" to any question? If so, you may be facing a conflict of interest. Before you act, ask the Legal or Human Resources Departments for help.











Accurate Records and Accounts

When we have a clear view of our finances, we make better decisions for our business and build stronger relationships. We manage our financial records with integrity and aligned with our mission and values.



The Way We Work

Our customers, suppliers, and stakeholders must be able to trust that we're doing business ethically. We earn their trust by being accurate and honest in every transaction and entry in our business records. That means never recording something you know is wrong or allowing someone to pressure you into falsifying a record.

Accurate recordkeeping is everyone's responsibility. When you contribute to our records, check to make sure they are:



Accurate



Complete



Understandable



Captured in the right period

Follow all applicable laws and our internal policies and processes when creating, maintaining, retaining, or destroying records. Keep supporting documentation like receipts and notes to support our records retention policy, and never destroy a record that's needed for a lawsuit, an investigation, or an audit.



BUSINESS RECORDS INCLUDE...



ACCOUNTING REPORTS



INVOICES



BILLING DOCUMENTS



TIMESHEETS



PERFORMANCE REVIEWS



CONTRACTS, BIDS, AND PROPOSALS



EMAILS AND OTHER CORRESPONDENCE

What if I see something suspicious?

Our records are everyone's responsibility, so stay alert and **speak up** immediately if you see anything unusual, which could indicate possible fraud, bribery, or money laundering.



Time Recording Policy

Business Expense (Travel) Policy











Company Assets

Being a part of the AM General team means being trusted with the things that help us do our job and run the Company. Whether it's our facilities, equipment, information, or electronic resources, we make sure our assets are properly used and protected.



The Way We Work

Whether you're working in one of our facilities or remotely at home, you're using AM General resources to do your job. Occasional use of assets for personal reasons is permitted, but your use of those assets should be occasional and never

interfere with your responsibilities at AM General. Always use good judgment with these resources, using them only for their intended purpose, as well as following both good cybersecurity and physical security practices.

What are our assets?				
Physical assets	Electronic assets	Information assets		
These are the things we can actually see and touch, such as: Facilities and furniture Tools and equipment Company vehicles Office supplies	These assets keep our systems and networks running, such as: Computer hardware and software Networks and databases Mobile devices Internet access	This includes the information we gather or create, such as: Proprietary information Intellectual property		
Prevent these assets from loss, harm, or damage. Never borrow or remove them without proper approval.	Keep these assets secure and minimize personal use.	Protect them from unauthorized use or disclosure. See Proprietary Information to learn more.		







Company Assets



How do I protect electronic assets?

Above all, practice good cybersecurity. To protect our systems from malware and other cyber threats, follow our IT policies and procedures and adopt these good security habits:

- Update your passwords and keep them secure.
- Never share passwords.
- Never open suspicious links.
- Stay alert for potential phishing scams.
- Never install unauthorized software or use unsecured networks, like a public WiFi.
- Secure Company devices and contact the <u>Global Information Security Office</u> or the <u>Security (FSO) Office</u> if you suspect something suspicious.



DID YOU KNOW?



TIME IS ACTUALLY ONE OF OUR ASSETS – YOUR WORK TIME, TO BE SPECIFIC. WHEN YOU'RE ON COMPANY TIME, YOU'RE EXPECTED TO DO COMPANY WORK AND NOT WORK FOR ANYONE ELSE.



POLICY TOOLBOX

Protection of Limited Rights/ Proprietary Data

Acceptable Use Practice

Information Systems Security Plan (ISSP)











Proprietary Information and Intellectual Property

We constantly challenge ourselves to remain innovative and resourceful. The information we create and gather at AM General is vital to our success and our relationships, and we recognize our duty to protect it.



The Way We Work

Our work at AM General can sometimes expose us to information related to our business that is sensitive, proprietary, and not available to the public. Whether it concerns our Company, employees, customers, or business partners, this information can be harmful if it's disclosed.

If you ever handle proprietary information – gathering it, accessing it, or sharing it – do so with care. Classify it properly and only share it with those who are authorized to see it and have a business need to know it – never with anyone who isn't authorized. Be careful not to discuss or disclose proprietary information publicly (like in an elevator or on social media),

as it could harm our reputation and those with whom we work.

We also have a responsibility to protect the information and ideas we create as a Company – our intellectual property. It's the proprietary information that makes us unique and competitive. It also represents a significant investment of time and resources, so keep it secure. We require that all third parties sign non-disclosure agreements before information is shared, so only share what is necessary to achieve the business goal. See **Company Assets** and **Data Privacy** for more information.

What should I protect?

Proprietary information, including:

- Potential acquisitions or investment plans
- Marketing plans
- Projected sales or earnings
- New product ideas or product specifications
- Manufacturing methods
- Distributor or customer lists
- Employee lists and salaries

Intellectual property, including:

- Trademarks and service marks
- Copyrights and patents
- Engineering and manufacturing ideas
- Proprietary technology and designs
- Marketing and creative materials
- Branding and logos
- Trade secrets
- Business plans
- Assets belonging to third parties



Proprietary Information and Intellectual Property



WHICH WAY?

☐ I used to work for one of AM General's competitors and recently joined the Company. Is it OK to share my knowledge about my old employer with my new team?

If any of the information you plan to share is proprietary or proprietary information about our competitor, it would be highly unethical to share it. We respect proprietary information belonging to anyone, including our competitors.



Protection of Limited Rights/ Proprietary Data



WHAT IF THERE'S A LEAK?

If you're aware that information may have been disclosed (either inadvertently or through a breach), let the Legal Department know immediately so we can take action and minimize any damage.













Data Privacy

Protecting privacy is essential to securing the trust of our customers, employees, and business partners. We handle the personal information they entrust to us with extreme care and follow the laws and regulations to secure it.



The Way We Work

Our Company collects, stores, and accesses a great deal of personally identifiable information (PII) to conduct our business. Each of us must help to keep this information private, whether we're accessing it, storing it, or disposing of it.

AM General complies with all data privacy laws where we operate. If you encounter PII through your job, exercise a high standard of care to protect it. (See **Company Assets** and **Proprietary Information** to learn more.) If you're ever unsure how a law applies, ask the **Legal Department** for guidance.

How can I help protect privacy?

There are simple things you can do each day to protect PII from possible misuse or disclosure:

- Only use PII for legitimate business purposes.
- Gather only the minimum amount of information you need.
- Never share it with unauthorized people.
- Never access it on unsecured networks.
- Never send it to unattended devices.
- Dispose of it securely and in line with our policies.

If you believe there has been a data breach or disclosure that violates our policies or the law, **speak up** immediately. This action will ensure we meet any legal obligations to report the breach to the proper authorities in a timely fashion.



WHAT IS PII?

It's personally identifiable information that could be used to identify someone, such as:

- · Name, address, or email
- Date of birth
- Phone number
- Social security number
- Banking information
- Location data



Proprietary Data

Acceptable Use Practice



We're proud of our Company.
When we talk about it, we act as ambassadors of our brand. To ensure consistent and positive messaging, we communicate carefully and respectfully.



The Way We Work

The things we say about our Company, whether in conversations, in writing, or online, impact our reputation. Saying something misleading or inaccurate (even if we don't mean it to be), could cause serious harm, so we make sure that only designated representatives speak on our behalf.

If you receive a request for comment or information and you're not authorized to respond, refer it to the Director of Marketing or another authorized AM General resource. For other inquiries:

Inquiries from:	Refer them to:
The media	Marketing
Investors	<u>Finance</u>
Congressional inquiries	Government Relations/Legal/ Contracts
Employees	Human Resources
The public	Marketing



Responsible Communication



What about social media?

AM General respects your right to use social media, but we expect you to be responsible and never suggest that you speak for our Company. Never use social media to harm our customers. our Company, or each other. Be professional and helpful in your postings, and never share anything offensive, illegal, or proprietary.



WHY SHOULDN'T I SPEAK FOR **AM GENERAL?**

You could run the risk of:

- Making promises we can't keep
- Making inaccurate or even illegal statements about our Company or our policies
- Leaking proprietary information or intellectual property
- Expressing views that conflict with our values or culture
- Posting things that are offensive or illegal
- Harassing, bullying, or defaming others

WHICH WAY?

I just read an article online that contained inaccurate information about AM General. It's something I could correct easily. If I am polite and accurate, may I respond in the comment section to correct it?

No, you may not. While we appreciate that you want to help, there's a chance that your reply could be inconsistent with our Company messaging. Let your supervisor know about the article so that the Company can take appropriate steps to respond.





Insider Trading

We believe everyone should play by the same rules in investing. To ensure our investments are legal, we never base them on nonpublic information that we learn through our work.



The Way We Work

As employees of AM General, we could learn information in the course of performing our work about companies (such as our customers, business partners, or subcontractors) that isn't known to the public. Having access to this material nonpublic information and using it to make investment decisions is an illegal practice called insider trading, and we are careful to avoid it.

Even though AM General is not a publicly traded company, we follow the laws designed to prevent insider trading. Never buy or sell securities (or "tip" someone else to do so) based on information you learn through your job. Make sure inside information stays inside – in other words, keep it proprietary.

Penalties for tipping or trading on material nonpublic information can be severe, including prison time, so avoid any activity that might even look like insider trading. Ask the **Legal Department** before trading if you're unsure if it's OK to trade.



IS THIS INSIDE INFORMATION?

Inside information can take many different forms, but it often includes:

- New or developing products
- Marketing strategies
- Financial earnings or losses
- Potential business deals
- Customer or third-party information
- Leadership changes
- Proposed mergers or acquisitions
- Potential legal action or investigations



WHEN DOES INFORMATION BECOME "PUBLIC"?

It's public when it's been made available through an official press release, government filing, or some other official communication.





Our Customers

Our customers are our highest priority, and they deserve our very best. Every day brings us new opportunities to meet their complex needs and exceed their expectations.

In This Section

Product Quality and Safety Fair and Honest Competition **Government Customers** Global Trade



Product Quality and Safety

The better and safer our products, the stronger the bond we forge with our customers. We never stop working to ensure that any product carrying the AM General name represents uncompromising quality and safety.

The Way We Work

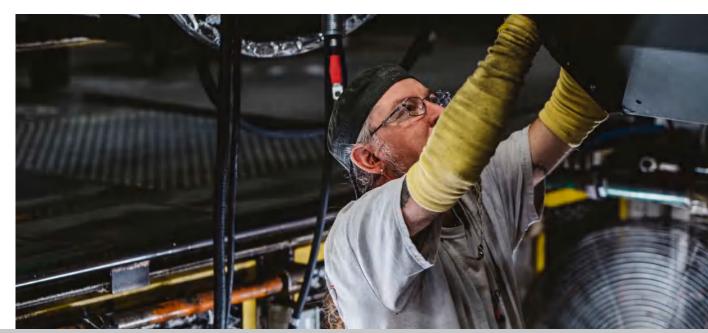
We are consistently looking for creative ways to innovate and design products with both a high standard of safety and quality. By following strict processes and procedures, we are able to meet or exceed our own internal standards as well as industry standards in order to maintain our customers' trust. Fach of us must insist on excellence from ourselves and our business partners, guided by our core values and our commitment to exceeding customer expectations.

A variety of complex laws, government requirements, and industry standards also apply to our work. Make sure you understand them and carefully follow them.

How can I help?

- Never take shortcuts in developing, manufacturing, or testing our products.
- Receive all required training and ask questions if something isn't clear.
- Follow our policies and manufacturing procedures to the letter.
- Stay alert for possible hazards or misconduct involving our products.
- Hold our vendors and suppliers to the same high standards.
- Keep quality and safety in mind with every innovation.
- **Speak up** immediately if you see any violation of our standards or other quality or safety concerns.













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WHICH WAY?

I work in manufacturing our products and noticed a more experienced colleague skipping a step in our process. When I pointed it out, this colleague said it was an unnecessary step that doesn't affect safety. Should I say something?

Yes, you should. We never let safety take a back seat to speed, convenience, or anything else. Even though your colleague is more experienced, it doesn't mean that your concerns about safety don't matter. Speak up immediately about your concerns.

Ensure quality and safety throughout our operations

Vendors and suppliers	If you work with anyone who contributes to our products, monitor the quality of their work, along with their policies, procedures, and safety records.
Manufacturing	If you help manufacture our products, know and follow our quality and safety standards as well as all legal requirements.
Supply chain	Monitor and ensure quality, safety, and security in every aspect of our distribution systems – watch for any lapses or potential risks.









1



Fair and Honest Competition

In a crowded marketplace, competition gets tough, but it also makes us better. We welcome competition and win business fairly and legally – through the strength of our products and our people.



The Way We Work

A variety of antitrust and competition laws apply to our business, wherever in the world we do business. We're committed to following these laws which help to ensure that everyone plays by the same rules – nobody is prevented from competing.

If your job with AM General puts you in contact with competitors, suppliers, or other business partners, make honesty and fairness your top priorities. Use good judgment and get to know the competition laws that apply to you. If you're ever unsure, **ask for help** before you act.



What's my role?		
Use care in conversations	If you interact with a competitor (like at a trade show), avoid even the appearance of a conversation about limiting competition.	
Gather information fairly	When trying to learn about the competition, only use public sources of information – never anything proprietary or obtained illegally.	
Advertise and market ethically	If you promote our Company, never make a claim you can't back up or a promise you can't keep. We're responsible for all claims we make.	

















IS THIS

When talking to a competitor, be sure you can answer "no" to each of the following:

Does it sound like you're discussing ...



SETTING PRICES?



PRODUCT VOLUMES OR SUPPLY?



DETERMINING WHICH SERVICES TO SELL?



DIVIDING MARKETS OR TERRITORIES?



BOYCOTTING OTHER COMPETITORS?



SHARING STRATEGIC INFORMATION?

Any "yes" or "maybe" answers are a warning sign to stop the conversation and go ask for guidance.



At an industry event, I found myself in a conversation with a competitor that suddenly turned to a discussion of prices. I made an excuse and left. Is that the right thing to do?

Partially. While it's good that you left the conversation, you should also let them know that it's inappropriate. Then after you leave, you should contact the Legal Department right away to let them know what happened.



Government Customers

AM General proudly serves a variety of customers, including governments. Having local, regional, and national government customers is both an honor and a serious responsibility, which we fulfill with integrity.



The Way We Work

We recognize that the way we serve government customers matters to them and the communities they serve, so we focus on honesty in every action and transaction. If you interact with our government customers, always provide accurate information and protect their classified information. Above all, know and follow the many special legal, regulatory, and contractual requirements that apply.

These requirements may affect:



Bidding



Accounting



Invoices and billing



Subcontracting



Employment practices



Contract performance



Gifts and entertainment



Purchasing

AM General is obligated to safeguard and protect any material, equipment, or other property (tangible and intangible) provided to us by our government customers, using the same reasonable standard of care we use to protect our own material and intellectual property.

What about hiring former government employees?

Because these situations could lead to conflicts of interest, special rules apply to hiring current or past military or government employees. Before you begin the process of hiring a candidate like this, make sure you're following all regulations and contact the **Legal Department** if you have questions.

Keep in mind that what's required of us may also be required of any individuals or companies who work on AM General's behalf.











Government Customers



WE MUST ALWAYS:

- Use current, accurate and certified cost and pricing data
- Provide accurate and truthful information (in proposals, quotes, invoices, reports and other certifications, representations, and communications)
- Protect classified information and government property

WE MUST NEVER:

- Seek source selection information or contractor bid or proposal information
- Try to obtain or use unauthorized information about our competitors
- Break the rules when it comes to hiring current or former government team employees – contact the <u>Legal Department</u> before entering into any discussions



WHICH LAWS APPLY?

We follow the procurement policies, processes, regulations, and laws of the countries where we operate. In the United States, that includes:

- The Federal Acquisition Regulation (FAR)
- The Defense Federal Acquisition Regulation Supplement (DFARS)
- The Truthful Cost of Pricing Data Act, formerly known as the Truth in Negotiations Act













Global Trade

We send our products to customers in locations all around the world and recognize our responsibility to honor the trade laws that apply while staying true to our values, our Code, and our policies.



The Way We Work

Global trade can sometimes present ethical challenges, especially when laws and cultural differences clash with our policies and our core values. We're committed to handling these challenges ethically, avoiding any illegal, or inappropriate deals.

Ensure you understand the laws that apply in the countries where we do business and follow them without exception. That includes:

- Understanding AM General's trade control obligations in every transaction
- Never offering products or services to a sanctioned or embargoed territory, entity, or individual

- Never participating in an unauthorized national boycott
- Complying with export controls
- Obtaining all required export licenses
- Classifying transactions accurately, showing who is involved throughout the transaction and clearly stating "end use."

If you have questions about how global trade laws apply, contact the <u>International Trade</u>

<u>Compliance Department</u>, the <u>Legal Department</u> or email <u>InternationalTradeCompliance@</u>

<u>AMGeneral.com</u>.

What are some laws that apply?		
The Foreign Corrupt Practices Act (FCPA)	Prohibits giving or offering anything of value to a public official to gain an improper advantage	
Export Administration Regulations (EAR)	Controls exports of commerce-controlled goods, software, and technology	
The International Traffic in Arms Regulations (ITAR)	Controls the import and export of defense articles, technology, and services	

















HAVE I COMPLIED?

To make sure a transaction is legal and ethical, check each of these items:

- ✓ All records are accurate, transparent, and complete.
- ✓ We aren't paying any facilitation fees.
- ✓ The proper declared value is being used.
- ✓ The final destination is shown and confirmed.
- ✓ No sanctioned countries or parties are involved.
- ✓ There is no participation in a boycott of any country.



Anti-Corruption Policy

Foreign Visitor Request Procedure

Our Suppliers

It takes more than tools and technology to build our products – it takes healthy and productive relationships. We nurture the people and partnerships that contribute to our success.

In This Section

Interactions with **Business Partners**

Bribery and Corruption

The Exchange of **Business Courtesies**

Human Rights













Interactions with Business Partners

We believe the more work we put into our relationships, the stronger our products and our business become. That's why we highlight mutual trust and respect in all aspects of our business partnerships.



The Way We Work

Our business partners contribute to the quality of our products and the results we achieve for our customers, so AM General holds them to the same high standards as our own employees. If your work involves selecting or interacting with suppliers, vendors, or other business partners, help us maintain positive and ethical relationships.

Be fair and honest in all dealings with business partners. Never try to influence them (or be influenced by them) with inappropriate offers. See **Bribery and Corruption** and **The Exchange of Business Courtesies** to learn more. Also monitor their work, making sure that they:

- Represent AM General with integrity
- Follow our policies and procedures, including those referenced on our <u>Supplier Website</u>
- Fulfill their contractual obligations
- Follow applicable laws

If your work involves selecting business partners, remember that AM General is committed to working with those who share our values and our dedication to doing what's right.

If you suspect unethical or illegal acts by a business partner, don't ignore them. **Speak up** right away.



AM I CHOOSING BUSINESS PARTNERS ETHICALLY?

You are if you base your choices only on:

- AM General's needs
- Services offered
- Price and value
- Quality of goods and services
- · Reputation and record

Never allow personal bias or personal gain to enter into the selection process, and never work with excluded parties.









Interactions with Business Partners





WHICH WAY

One of our customers mentioned a rumor they heard about one of our long-time suppliers – that they might be engaged in human rights violations. Since I don't know if this is true, should I wait until I find out more?

No, you shouldn't. We need to know if one of our suppliers could be violating the law. It doesn't matter how long they've been our partner – the things they do reflect on our Company. You don't have to confirm the rumor – just speak up about it right away.





WAYS TO BUILD STRONGER PARTNERSHIPS



ENSURE PROPER DUE DILIGENCE IS COMPLETED ON ALL BUSINESS PARTNERS.



MAKE SURE BUSINESS PARTNERS COMPLY WITH OUR ANTI-CORRUPTION POLICY.



AVOID BEHAVIOR THAT COULD SUGGEST A CONFLICT OF INTEREST.



ENSURE SUPPLIERS
UNDERSTAND THAT THE
REQUIREMENTS IN OUR
GOVERNMENT CONTRACTS
FLOW DOWN TO THEM.



PROTECT PROPRIETARY
INFORMATION AND
INTELLECTUAL PROPERTY
OF OUR BUSINESS
PARTNERS AND ENSURE
THEY PROTECT OURS.

Bribery and Corruption

Our Company's reputation is worth far more to us than anything we could gain through acts of bribery or corruption. When we succeed, it's because we've earned it.



The Way We Work

Bribery and corruption can cause us to make decisions for our own benefit and at the expense of AM General, our customers, and our communities. Laws exist around the world to prevent this activity, and we must uphold them wherever we do business. In short, when it comes to bribes, don't pay them and don't accept them.

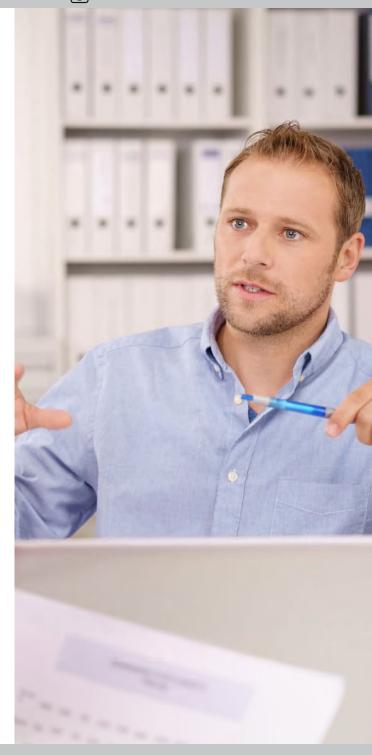
We do not make facilitation payments. These are payments made outside of normal business processes to expedite routine government actions such as clearing customs, obtaining permits, or visa processing.



WHAT DOES A BRIBE LOOK LIKE?

Bribes aren't always obvious, but they are often:

- Cash, gift cards, or special discounts
- Lavish gifts or entertainment
- Securities or stock options
- Charitable or political donations
- Employment offers
- Travel expense reimbursement













Bribery and Corruption



What to do	What NOT to do
Be ethical in all interactions with customers, suppliers, and other business partners and watch for possible bribery.	Never offer or accept anything that could look like a bribe, to gain an advantage or influence a decision (even if it's small or "customary").
Know the laws that apply to us and ask the Legal Department if you have questions.	Never give or accept anything of value if you're unsure if it violates the law or our policies.
Use extra care with government officials.	Never offer anything of value to a government official, including meals or entertainment without prior approval from the Legal Department . Also never agree to make "facilitation payments" to government officials (no matter how small) to speed up routine government action.
Work hard to win or retain business.	Never make inappropriate offers of gifts or entertainment to win business or gain favor. See The Exchange of Business Courtesies to learn more.
Make sure all customer invoices accurately reflect what was sold.	Never falsify invoices or accept payment that exceeds what is owed.
Speak up about potential acts of bribery.	Never ignore possible acts of bribery, whether it happens in our Company or with a third party.













The Exchange of Business Courtesies

We believe in building goodwill with customers and business partners, but our decision-making in these relationships should never be clouded by improper offers.



The Way We Work

Even when courtesies are exchanged with the best intentions, they could be interpreted as something improper and potentially a conflict of interest. We must never offer or accept anything that could call AM General's integrity into question.

Our policy with business courtesies is simple: We don't offer or accept business courtesies that could look like an attempt to influence someone or win business. Ensure you know and follow our policies, recognizing that some small gifts may be appropriate and should be properly documented.

Remember that special regulations apply when dealing with government employees. If you're ever unsure, ask the **Legal Department** for guidance.

WHICH WAY?

A supplier sent me a gift in the mail. I know it violates our policies, but I'm afraid that refusing it will insult them. What should I do?

It depends. First, you should notify your supervisor to determine the proper course of action. If the gift is something that can be shared with your team, it may be OK. If you feel you can't refuse it, the Human Resources or Legal Departments can help you take appropriate action (like distributing the gift or donating it to charity).









• Tickets to sporting events

giver's policy







What's appropriate?	What's not?		
With non-government officials:			
 Small gifts valued at less than \$100 A reasonable meal when business is discussed 	Anything illegal or solicitedLavish or inappropriate gifts or entertainment		
 Gift baskets or other food items 	 Cash, gift cards, stock, or special discounts 		

With government officials:

- Small gifts valued at less than \$20 (or less than \$50 per year), like promotional items
- Occasional small refreshments (soft drinks and snacks)
- Meals or transportation valued at less than \$20 (or less than \$50 per year)

Anything of value that exceeds these limits

• An offer that violates the recipient's or the



Gifts and Entertainment Policy











Human Rights

Our products impact people around the world – from those who use them to those who help build them. We're determined to protect them all with quality products and a commitment to preserving human rights.



The Way We Work

Nearly every aspect of our business can impact human rights. The way we source materials, manufacture our products, and sell and distribute them – they all affect people and communities, and it's up to each of us to play a positive and protective role.

AM General expects you, no matter what job you hold, to work ethically and help ensure that everyone who contributes to our products has the right to live and work freely and with dignity.

Remember, we prohibit human rights violations such as:

- Child labor
- Forced or compulsory labor
- Human trafficking
- Physical punishment
- Violence and human rights violations in connection with the mining of conflict minerals

How can I prevent human rights abuses?

Follow all human rights laws that apply to us. Remember, different laws may apply in different countries, so ask the **Legal Department** if you're unsure how a law applies.

Also ensure that our business partners share our commitment by providing high-quality, responsibly sourced products and safe and fair work environments and following applicable laws, including those aimed at providing conflict-free minerals.

Speak up if you become aware of a possible human rights violation.



WHAT MAKES A SAFE AND FAIR WORKPLACE?

When it gives employees:



SAFE WORK CONDITIONS



FAIR PAY



REASONABLE AND LEGAL WORK HOURS



Supplier Website





We're much more than a business – we're a responsible corporate citizen, holding ourselves accountable for the impact we have on our communities and our world.

In This Section

Environmental Protection
Community Involvement
Political Activities



Environmental Protection

We're aware of the impact our business can have on our world. In every decision we make, we strive to reduce our impact on the environment and build a cleaner, more sustainable future.



The Way We Work

We take our environmental responsibility seriously, going above and beyond what's legally required to protect our world. AM General relies on each of us to be good stewards of our resources and our environment.

How can I support our environmental commitment?

Stay aware of your own environmental impact and adopt these good habits:

- Whenever you can, conserve, recycle, or reuse resources to reduce the amount of waste and emissions we generate.
- Know and carefully follow environmental laws and regulations wherever we operate.
- Follow our Company's procedures to safely store, handle, and dispose of waste.
- Actively participate in Company-sponsored initiatives relating to recycling and waste reduction
- Promote our sustainability efforts by choosing cleaner, greener options if you're involved in purchasing for our Company.
- Share any ideas you have and support environmentally friendly initiatives in our communities and our operations.
- Speak up if you see or suspect any environmental violation involving the Company or its properties.

WHICH WAY?

☐ I have noticed an employee disposing of waste in a way that seems harmful to the environment, but it's not in my area, and I don't want to get involved. What should I do?

You should report your concern immediately. It doesn't matter that it's not in your area. All AM General employees are responsible for taking action if possible environmental harm is being done.



Community Involvement

We are active members of our communities, always willing to lend our support and establish meaningful connections with those in need.



The Way We Work

Helping our communities is a serious responsibility. It's also an opportunity for us to grow both as a company and as individuals to better understand our world and those we serve. Whether it's through volunteering or charitable giving efforts, each of us can make a positive and personal impact in our communities by supporting AM General's global and local initiatives.

What about the causes that are important to me?

The Company also encourages you to get involved with your own personal causes, but when you do something on your own, remember:

- Never let your independent volunteer activities interfere with your work – participate on your own time.
- Use your own money and resources, including printers, phones, and computers.
- Don't donate to a cause in AM General's name without prior approval. We cannot reimburse you for your donation. Remember, any corporate sponsorship requests must be sent to the office of the CEO.
- Never pressure colleagues to participate or donate to your cause.



SHOW YOUR COMMITMENT

YOU CAN HELP AM GENERAL GIVE BACK TO OUR COMMUNITIES. WATCH FOR EVENTS AND WAYS TO GET INVOLVED.





Political Activities

We believe in keeping the political process fair – every employee engaging freely in the process, but we never allow political activities to interfere in our workplace or influence an election.



The Way We Work

We believe every AM General employee has the right to hold his or her unique political opinions and support candidates of his or her choice, but we expect you to act responsibly and keep your activities separate from the workplace.

While we encourage you to get involved in a lawful manner, you should never act politically in our Company's name, including speaking for or donating to a candidate on AM General's behalf, whether on social media or in public. When you get involved, also be sure to:

- Use your own time and resources to support your activities.
- Be respectful and recognize that your coworkers have the same rights as you.
- Never post political signs or share political communications in the workplace.
- Respect the law and act in a lawful manner.



YOU CAN GET INVOLVED

AM GENERAL HAS FORMED ITS OWN POLITICAL ACTION COMMITTEE, AMGPAC, WHICH EDUCATES LAWMAKERS ON ISSUES IMPORTANT TO AM GENERAL. IF YOU WOULD LIKE TO CONTRIBUTE, DO SO WITH YOUR OWN FUNDS. YOU WILL NOT BE REIMBURSED.

WHICH WAY?

☐ I plan on speaking at a fundraiser for a candidate running for local office. Is it OK to mention my position at AM General if I don't use any Company funds or resources?

No. It would be inappropriate to associate our name in any manner with your political activities. Be sure that you make it clear that you are speaking only for yourself.

What should I watch for? Be careful that interactions **Improper** with government officials lobbying or regulators don't look like political lobbying. Talk to the **Legal Department** first. **Political** Never pressure a colleague to support or donate to your pressure chosen candidate or party. **Improper** Avoid making political contribuinfluence tions to seek favor or influence someone's decision-making. **Possible** Ensure that your campaigning or holding office doesn't conflicts appear to conflict with your of interest duties at AM General.



Our Destination





Now that you've reached the end of the Code, you've seen how the issues we face as a business can be challenging to navigate. You now have a better understanding of how to handle those issues – all while keeping our **R.I.D.E** values at the forefront of everything we do.

The end of the Code, however, is only the beginning of our journey together. Our destination is ours to determine.

Every step we take along the way – the things we say, the decisions we make, the interactions we have – brings us closer to or farther away from our goals and supporting Sgt. Smith. As a steward of AM General's legacy and reputation, you help determine which road we take. With the Code as your guide and our R.I.D.E. values to inspire you, you'll help take us in the right direction and show the world what it means to work the AM General way.

If you have a question about the Code or our policies, ask your supervisor or contact one of the resources listed in the Code.

Thank you for your commitment to AM General's Code of Conduct and Sgt. Smith.

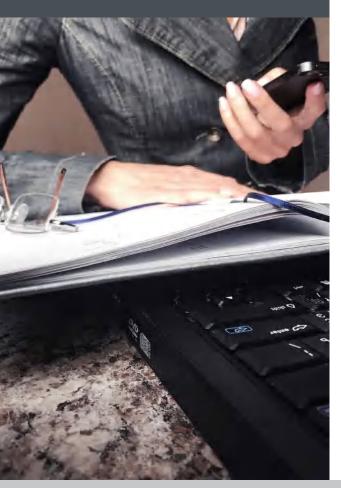


We reserve the right to modify this Code at any time, as necessary, along with our policies, procedures, and conditions of employment. The Code is not intended as a contract or guarantee of employment.

AM General supports employees' right to speak out publicly about matters of public concern and to participate in certain activities and communications related to the terms and conditions of their employment. Nothing in this Code or in any of our policies is intended to limit or interfere with that right. That includes activities protected under Section 7 of the U.S. National Labor Relations Act, such as discussions related to wages, hours, working conditions, health hazards, and safety issues.

Our Policies

The following is a list of policies and other resources referenced in the Code. Note that this is not an exhaustive list of AM General's policies.



Acceptable Use Practice

Anti-Corruption Policy

Business Expense (Travel) Policy

Contributions, Donations, and Sponsorships

Diversity and Inclusion Policy

Drug-Free Workplace and Work Force Policy

Employee Assistance Program (EAP)

Equal Employment Opportunity Policy

Fair Competition Policy

Foreign Visitor Request Procedure

Gifts and Entertainment Policy

Health, Safety, Environmental and Sustainability Policy

Human Rights Policy

Information Systems Security Plan (ISSP)

Insider Threat Policy

International Trade Compliance Policy

Lobbying Policy

Open Door Policy

Pre-Employment Drug Screening

Protection of Limited Rights/Proprietary Data

Records Management Policy

Sexual and Other Unlawful Harassment Policy

Social Media Policy

Supplier Website

Time Recording Policy

Weapon-Free Workplace and Workplace Violence Prevention Policy









51

Where to Go for Help

Do you need additional guidance?

AM General has a variety of resources to contact for help:



Issues or concerns	Contact
To ask questions, report potential misconduct or other ethical concerns	Your supervisor or a member of senior management Human Resources The Legal Department The Ethics Hotline, accessible by phone at 1-800-344-6593
For legal questions	Legal Department
To view Company policies	Visit the AM General Intranet site
For information about Company benefits	Human Resources
For media inquiries	Marketing
For sponsorships and endorsements	<u>Legal Department</u>
For analyst or investor inquiries	Investor Relations
For international trade inquiries	International Trade Compliance Department
For information security inquiries	Global Information Security Office
For general security concerns	Security (FSO) Office