

# AM GENERAL

MISSION READY ★ FUTURE DRIVEN



**INTEGRITY:  
OUR DRIVING FORCE  
CODE OF CONDUCT**

*Code of Conduct*





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## A MESSAGE FROM OUR CEO

**AM General Teammates,**

**Driving with integrity leads to success.**



No matter your job title, you are responsible for AM General's success — we all are. It's a responsibility rooted in our purpose, which is to serve those who serve to protect us, and guided by our shared R.I.D.E. values: **R**esponsive, **I**ntegrity, **D**ynamic, and **E**xcellence. And when we live these values in our

daily work and go out of our way to always do the right thing, we set ourselves and AM General up for continued growth and success.

But you never have to go it alone. Our Code of Conduct ("Code") is here to help you navigate the path forward. Based on the R.I.D.E. values, it lays out what's expected of us as members of the AM General team. It's a quick and reliable guide for understanding common workplace issues, identifying important resources, and figuring out how to apply respect and integrity in all aspects of our work.

The pages ahead cover many of the topics and dilemmas you may one day confront in the workplace, but it's impossible to predict every scenario. If you follow the letter and spirit of the Code and allow it to act as your north star, you will stay the course.

Moving the world is a big job — one we're accomplishing together at AM General. As we continue to grow the organization and serve Sgt. Smith, we do so in a way that preserves and honors the legacy we've built. Remember that every job at AM General matters, and we all have something to contribute on our shared journey. It is my honor to lead a team that's always ready for the next mission.

**Jim Cannon** President & Chief Executive Officer

**"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**



# 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. We are mission-ready and future-driven.

## 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 **R**ESPONSIVE

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

### WE HAVE **I**NTEGRITY

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 **E**XCELLENCE

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 AM GENERAL THE SAME WAY —  
ON A SOLID FOUNDATION OF EXCELLENCE,  
ACCOUNTABILITY, AND INTEGRITY.

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## 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's 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 will not 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*
- ▶ *Clarify key terms and how they apply to you*
- ▶ *Link you to AM General policies and resources for more information*

### **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 business partners, and our customers. 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 AM General could also face civil or criminal penalties.



**CODE OF CONDUCT** INTEGRITY: OUR DRIVING FORCE



# OUR RESPONSIBILITIES

With every vehicle 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:

**Leverage our core values** Keep our core values top-of-mind and apply them to every action, interaction, and decision and follow the laws and regulations that apply to our work role — whether we're working from one of our facilities or at a remote location.

**Seek help and help others** Ask for guidance when it's unclear how a law or policy applies and share our knowledge with coworkers when they seem unsure.

**Speak up** Watch for and share concerns if we ever see or suspect potential misconduct and cooperate in investigations.

**AM General supervisors have further responsibilities:**

**Create a strong ethical culture** Show 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.

**Open your door** Be available to your team when they need to share concerns and ensure they're comfortable doing so — confident that they'll be heard and they won't face retaliation.

**Be proactive** Never turn a blind eye to misconduct — instead, stay alert for it and speak up right away, before harm is done.

## The Code is for all of us

Each of us has a responsibility to follow this Code, whether we're directors, officers, or full- or 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 conduct periodic compliance reviews to assess whether the Code is working as intended.



**CODE OF CONDUCT** INTEGRITY: OUR DRIVING FORCE



# 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 AM General and our customers and in compliance with the law and our standards. When the right choice isn't clear, look to the Code. If you're still unsure, ask yourself:



**IS THIS ACTION LEGAL?**



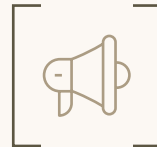
**DOES IT ALIGN WITH OUR CORE VALUES?**



**DOES IT FOLLOW OUR CODE AND OUR POLICIES?**



**IS IT GOOD FOR AM GENERAL AND OUR CUSTOMERS?**



**WOULD I FEEL COMFORTABLE IF THIS ACTION WERE TO BE SHARED ON SOCIAL MEDIA?**



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.



# 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 AM General 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 is available 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

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 AM General 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.

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



### POLICY TOOLBOX

**NON-RETALIATION AGAINST WHISTLEBLOWERS  
AND OPEN DOOR POLICY**



## OUR TEAM

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.

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# 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 environment when we stay alert, 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 Facility Security Officer (FSO) or Human Resources immediately.



### POLICY TOOLBOX

DRUG-FREE WORKPLACE  
AND WORK FORCE POLICY

PRE-EMPLOYMENT DRUG SCREENING

HEALTH, SAFETY, ENVIRONMENTAL  
AND SUSTAINABILITY POLICY

INSIDER THREAT PROGRAM PLAN

EMPLOYEE ASSISTANCE PROGRAM (EAP)

WORKPLACE VIOLENCE AND WEAPON-FREE  
WORKPLACE POLICY

# RESPECTFUL WORKPLACE

At AM General, we firmly believe that our differences power innovation and our inclusion drives performance. Each employee plays a unique and important role. 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 discrimination, intimidation, harassment, or bullying. These behaviors violate our core values and damage our collaborative spirit. It won't be tolerated.

Developing AM General's products requires skill, experience, and innovative thinking — qualities on full display in our 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. Treat others the same way you would like to be treated — fairly and with respect.

If you experience discrimination or 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.

### 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.

## COULD THIS BE HARASSMENT?

Behavior is likely harassment if it involves:

- ▶ Gestures
- ▶ Unwanted physical contact
- ▶ Intimidating or degrading words or names
- ▶ Offensive remarks or jokes spoken or written in emails or on social media
- ▶ 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

NON-RETALIATION AGAINST WHISTLEBLOWERS  
AND OPEN DOOR 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.

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**CODE OF CONDUCT** INTEGRITY: OUR DRIVING FORCE



# CONFLICTS OF INTEREST

Each of us has interests and relationships outside of work, but we never allow them to undermine AM General 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 or personal friend*
- ▶ **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:** *Pursuing opportunities with business partners with whom you have a personal relationship without conducting adequate due diligence*
- ▶ **Personal benefit or gain:** *Receiving improper personal gain or business courtesies because of your position 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. 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.

### IS THIS A CONFLICT?

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

- ▶ **1.** Could I or a family member benefit from this situation?
- ▶ **2.** Could it influence my business decisions?
- ▶ **3.** 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 Department for help.



### POLICY TOOLBOX

#### ANTI-CORRUPTION POLICY

#### GIFTS AND ENTERTAINMENT POLICY





# 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 and compliantly. 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.

## 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.

### BUSINESS RECORDS INCLUDE ...

- ▶ Accounting reports
- ▶ Performance reviews
- ▶ Invoices
- ▶ Contracts, bids, and proposals
- ▶ Billing documents
- ▶ Emails and other correspondence
- ▶ Timesheets



### POLICY TOOLBOX RECORDS MANAGEMENT POLICY

### 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 successfully do our job. 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 at a remote location, 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 and in compliance with cybersecurity and physical security best practices.

### What are our assets?



#### Physical assets

These are the things we can actually see and touch, such as:

- ▶ Facilities and furniture
- ▶ Tools and equipment
- ▶ AM General vehicles
- ▶ Office supplies

Prevent these assets from loss, harm, or damage. Never borrow or remove them without proper approval.



#### Electronic assets

These assets keep our systems and networks running, such as:

- ▶ Computer hardware and software
- ▶ Networks and databases
- ▶ Mobile devices
- ▶ Internet access

Keep these assets secure and minimize personal use.



#### Information assets

This includes the information we gather or create, such as:

- ▶ Proprietary information
- ▶ Intellectual property

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 IS&S policies and procedures and adopt these good security habits:

- ▶ *Update your passwords and keep them secure.*
- ▶ *Never use or type your AM General password on any external device or website.*
- ▶ *Never share passwords.*
- ▶ *Never open suspicious links.*
- ▶ *Stay alert for potential phishing scams.*
- ▶ *Never install unauthorized software or use unsecured networks, like public Wi-Fi.*
- ▶ *Secure AM General devices and contact the Enterprise Information Security Office or the Facility Security Officer (FSO) if you suspect something suspicious.*

## DID YOU KNOW?

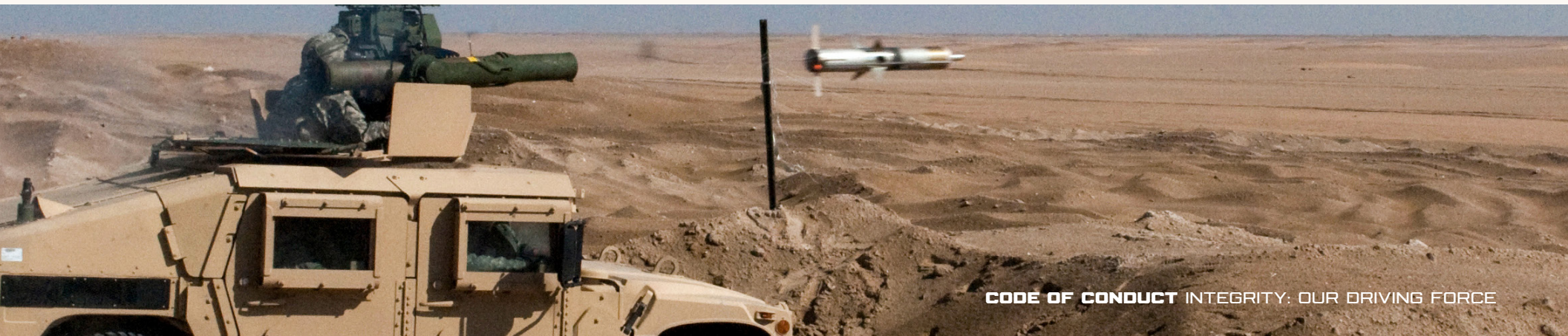
Time is actually one of our assets — your work time, to be specific. When you're on AM General time, you're expected to do AM General work and not work for anyone else.



## POLICY TOOLBOX

PROTECTION OF LIMITED RIGHTS/  
PROPRIETARY DATA

ACCEPTABLE USE PRACTICES





# 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 AM General, 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.



### AM I COMPLIANT WITH OUR POLICIES AND ADEQUATELY PROTECTING SENSITIVE INFORMATION?

**YOU ARE IF YOU CAN AGREE WITH THESE STATEMENTS:**

- ✓ I'm practicing good cybersecurity and following our IS&S policies.
- I never send Controlled Unclassified Information, confidential information, or sensitive information to personal email accounts.
- ✓ I never store CUI, confidential information, or sensitive information on personal devices.
- I do not take or share pictures of
- ✓ AM General facilities, equipment, data, or property without prior authorization.
- ✓ I only access sensitive information on secure networks.
- ✓ I never allow an unauthorized person to use AM General devices.





# PROPRIETARY INFORMATION AND INTELLECTUAL PROPERTY

We also have a responsibility to protect the information and ideas we create at AM General — 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. Share only what is necessary to achieve the business goal. See [Company Assets](#) and [Data Privacy](#) for more information.

## WHAT SHOULD I PROTECT?

Proprietary information, including:

- ▶ Project or operating plans and timelines
- ▶ Contract details
- ▶ Potential acquisitions or investment plans
- ▶ Marketing plans
- ▶ Projected sales or earnings
- ▶ New product ideas or product specifications
- ▶ Manufacturing methods
- ▶ Distributor or customer lists
- ▶ Product and customer pricing
- ▶ Controlled Unclassified Information (CUI)

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

## WHAT IF THERE'S A LEAK?

If you're aware that information may have been disclosed (either inadvertently or through a breach), inform the [Legal Department](#) and the Enterprise Information Security Office immediately so we can take action and minimize any damage.



**POLICY TOOLBOX**  
PROTECTION OF LIMITED  
RIGHTS/PROPRIETARY DATA



# ARTIFICIAL INTELLIGENCE

The rapid development of artificial intelligence offers a world of new possibilities – and plenty of risks. AM General welcomes the potential of AI tools, including generative artificial intelligence (gen AI), to better serve our customers. But as with any technological innovation, we approach it with caution and a focus on doing what's right.

## THE WAY WE WORK

Not everyone at AM General may use or develop AI tools as part of their work. If you are authorized to use AI in your role, it's critical that you only use accounts and programs that are approved by the Enterprise Information Security Office, and that your use reflects our values and complies with the law and AM General's policies.

Because AI and gen AI tools operate by consuming and analyzing large amounts of data, we are careful about what information we input. Make sure AI training information is accurate and reliable, and never feed proprietary information, intellectual property, or personal data into public AI tools, as they could then become visible to anyone.

## Check the results

Machines aren't perfect. Like how we assure the quality of every vehicle we produce, we must constantly evaluate and reevaluate the quality of what our AI tools produce. Human oversight helps ensure that AI outputs are accurate and free of bias.

### WHAT GEN AI CAN (AND CAN'T) DO

Generative AI can create original, creative content using computer algorithms and data. ***But it cannot replace human judgment or reasoning.*** That is why we only use AI tools to enhance our work at AM General — not to completely do it for us. We see gen AI as a supplement — not a replacement for people or human oversight.







# 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

AM General 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.

### WHAT IS PII?

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

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

## 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.



### POLICY TOOLBOX

PROTECTION OF LIMITED RIGHTS/  
PROPRIETARY DATA

ACCEPTABLE USE PRACTICES



# RESPONSIBLE COMMUNICATION

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

## THE WAY WE WORK

The things we say about AM General, 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	<b>Marketing</b>
Investors	<b><u>Finance</u></b>
Congressional inquiries	<b><u>Government Relations/Legal/Contracts</u></b>
Employees	<b>Human Resources</b>
The public	<b>Marketing</b>



**POLICY TOOLBOX**  
**SOCIAL MEDIA POLICY**

## What about social media?

AM General respects your right to use social media, but we expect you to use it responsibly, never forgetting that your actions online could end up reflecting onto our business.

Never post on behalf of AM General unless you have been designated a Social Media Spokesperson for your department and entrusted to comply with our Social Media Spokesperson Guidelines. And never use social media to harm our customers, AM General, or each other. Be professional and helpful in your postings, and never share anything offensive, illegal, or proprietary.

## THINK BEFORE YOU POST

Before publishing a comment, image, or video online, ask yourself:

- ▶ What is the purpose?
- ▶ Would I want this to be evidence in a lawsuit or reported in the news?
- ▶ Is there a better means of communicating?
- ▶ Am I being respectful?
- ▶ Am I revealing private or proprietary information?
- ▶ Would I say the same thing if I were speaking face-to-face to someone?
- ▶ Could my post harm AM General?

Even if you don't claim to speak for AM General, careless words and actions online can still harm AM General.



# 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 whether 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	25
Fair and Honest Competition	26
Government Customers	27
International Trade Compliance	28

# 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 high standards of both 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. Each 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. It is critical that you understand them and carefully follow them.

## How can I help ensure quality and safety?

There are things you can do every day to ensure quality and safety throughout our operations.

- ▶ *Never take shortcuts in developing, manufacturing, or testing our products.*
- ▶ *Receive all required training and ask questions if something isn't clear.*
- ▶ *Follow our quality and safety policies, manufacturing procedures and legal requirements to the letter.*
- ▶ *Stay alert for possible hazards or misconduct involving our products.*
- ▶ *Hold our vendors and suppliers to the same high standards. Monitor the quality of their work along with their policies, procedures, and safety records.*
- ▶ *Keep quality and safety in mind with every innovation.*
- ▶ *Monitor and ensure quality, safety, and security in every aspect of our distribution systems — watch for any lapses or potential risks.*
- ▶ **Speak up** *immediately if you see any violation of our standards or other quality or safety concerns.*



## 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 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 always comply with relevant competition laws as they apply to you. If you're ever unsure, ask for **help** before you act.

## IS THIS CONVERSATION OK?

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.

## 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 AM General, never make a claim you can't back up or a promise you can't keep. We're responsible for all claims we make.



## POLICY TOOLBOX

### FAIR COMPETITION POLICY





# 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:

- ▶ *Accounting*
- ▶ *Bidding*
- ▶ *Contract performance*
- ▶ *Employment practices*
- ▶ *Gifts and entertainment*
- ▶ *Invoices and billing*
- ▶ *Purchasing*
- ▶ *Subcontracting*

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.

## 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 Legal Department before entering 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*



### POLICY TOOLBOX

### GIFTS AND ENTERTAINMENT POLICY



# INTERNATIONAL TRADE COMPLIANCE

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

International 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 and avoiding any illegal or inappropriate deals.

### 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.



**CODE OF CONDUCT** INTEGRITY: OUR DRIVING FORCE



# INTERNATIONAL TRADE COMPLIANCE

Ensure you understand the laws that apply in the countries where we do business and comply 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"*
- ▶ *Involving ITC early in the project to ensure compliance*
- ▶ *Allowing ample time to ensure proper authorizations are in place for any activity*
- ▶ *Following the Foreign Visitor Process and providing ample notification to ITC and FSOs (minimum 5 days)*

## 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 the export 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

If you have questions about how international trade laws apply, contact the [International Trade Compliance Department](#), the [Legal Department](#), or email [InternationalTradeCompliance@AMGeneral.com](mailto:InternationalTradeCompliance@AMGeneral.com).



## POLICY TOOLBOX

INTERNATIONAL TRADE COMPLIANCE POLICY

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	31
Bribery and Corruption	33
The Exchange of Business Courtesies	34
Human Rights	35

# INTERACTIONS WITH BUSINESS PARTNERS

We believe the more effort we put into our relationships, the stronger our products and our business grow. 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 [Supplier Website](#)*
- ▶ *Fulfill their contractual obligations*
- ▶ *Follow applicable laws*

### 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 the selection process, and never work with excluded parties.





# INTERACTIONS WITH BUSINESS PARTNERS

If your work involves selecting business partners, remember that AM General always performs due diligence before entering a new business relationship. This includes a thorough and holistic assessment of prospective business partners to ensure not only success and stability within their operations, but alignment with our standards and values. See Source Evaluation and Selection to learn more. If you suspect unethical or illegal acts by a business partner, don't ignore them. **Speak up** 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 the proprietary information and intellectual property of our business partners and ensure they protect ours.



**POLICY TOOLBOX**  
**SUPPLIER WEBSITE**

**SOURCE EVALUATION AND SELECTION**



**CODE OF CONDUCT** INTEGRITY: OUR DRIVING FORCE





# BRIBERY AND CORRUPTION

AM General'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

#### What to do

Be ethical in all interactions with customers, suppliers, and other business partners and watch for possible bribery.

Know the laws that apply to us and ask the [Legal Department](#) if you have questions.

Use extra care with government officials.

Work hard to win or retain business.

Make sure all customer invoices accurately reflect what was sold.

[Speak up](#) about potential acts of bribery.

#### What NOT to do

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").

Never give or accept anything of value if you're unsure if it violates the law or our policies.

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.

Never make inappropriate offers of gifts or entertainment to win business or gain favor. See [The Exchange of Business Courtesies](#) to learn more.

Never falsify invoices or accept payment that exceeds what is owed

Never ignore possible acts of bribery, whether they happen in AM General or with a third party.



### POLICY TOOLBOX

#### ANTI-CORRUPTION POLICY

#### GIFTS AND ENTERTAINMENT POLICY



# 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 attempts 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.

### IS THIS OFFER OK?

If you're ever unsure about whether a business courtesy complies with our standards, ask yourself:

- ▶ Is this offer legal?
- ▶ Is it a customary part of doing business?
- ▶ Is it in line with our policies?
- ▶ Is it being offered without expectation of a certain outcome?
- ▶ Is it nominal in value?

Did you answer "yes" to all of these? If so, it may be appropriate, but ask for guidance if you're still in doubt.

## With non-government officials:

### What's appropriate?

- ▶ Small gifts valued at less than \$100
- ▶ A reasonable meal when business is discussed
- ▶ Gift baskets or other food items

### What's not?

- ▶ Anything illegal or solicited
- ▶ Lavish or inappropriate gifts or entertainment
- ▶ Cash, gift cards, stock, or special discounts
- ▶ Tickets to sporting events
- ▶ An offer that violates the recipient's or the giver's policy

## With government officials:

### What's appropriate?

- ▶ 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)

### What's not?

- ▶ Anything of value that exceeds these limit



### POLICY TOOLBOX

#### ANTI-CORRUPTION POLICY

#### 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*

### WHAT MAKES A SAFE AND FAIR WORKPLACE?

When it gives employees:

- ▶ Safe work conditions
- ▶ Fair pay
- ▶ Reasonable and legal work hours

## 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 to 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.



**POLICY TOOLBOX**  
**HUMAN RIGHTS POLICY**

[SUPPLIER WEBSITE](#)





# OUR COMMUNITIES

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	37
Community Involvement	38
Political Activities	39

# 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 planet, comply with laws protecting 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 re-use resources to reduce the amount of waste and emissions we generate.*
- ▶ *Know and carefully follow environmental laws and regulations wherever we operate.*
- ▶ *Follow AM General'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 AM General.*
- ▶ *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 AM General or its properties.*



**POLICY TOOLBOX**  
HEALTH, SAFETY, ENVIRONMENTAL  
AND SUSTAINABILITY POLICY



**CODE OF CONDUCT** INTEGRITY: OUR DRIVING FORCE





# 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 business 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?

AM General 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.*
- ▶ *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 in or donate to your cause.*

## How do I find the time?

We all want to give back to our communities, but often the hard part is making the time. That's why AM General offers each employee 16 hours of paid time off each year to participate in certain volunteer activities. These dedicated hours are separate from vacation, holiday, and other types of paid leave; employees are encouraged to use them to volunteer at any 501(c)(3) nonprofit community organization during regular working hours.

## SHOW YOUR COMMITMENT

You can help AM General give back to our communities. Watch for events and ways to get involved.



**POLICY TOOLBOX**  
CONTRIBUTIONS, DONATIONS,  
AND SPONSORSHIPS

COMMUNITY INVOLVEMENT  
PROGRAM (CIP)



# POLITICAL ACTIVITIES

We believe in keeping the political process fair, with 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 AM General'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 employee-run political action committee, AMGPAC , which educates lawmakers on issues important to AM General and our employees. If you would like to contribute, do so with your own funds. You will not be reimbursed.

## What should I watch for?

Improper lobbying	Be careful that interactions with government officials or regulators don't look like political lobbying. If you are not a registered lobbyist for AM General, you should never make requests of a member of Congress or their staff on behalf of AM General. Talk to the <a href="#">Legal Department</a> first.
Political pressure	Never pressure a colleague to support or donate to your chosen candidate or party.
Improper influence	Avoid making political contributions to seek favor or influence someone's decision-making.
Possible conflicts of interest	Ensure that your campaigning efforts or holding office doesn't appear to conflict with your duties at AM General.



## POLICY TOOLBOX LOBBYING POLICY



## THE ROAD AHEAD

This may be the end of our Code, but the journey is only beginning.

Each choice we make, interaction we have, or action we take drives us further down the road of success. While we may face challenges from time to time, if we stay true to our R.I.D.E. values and work as a team, we'll always find our bearings. We're counting on every member of the AM General team to do their part. And every member of the team can count on this Code. Return to it whenever you've lost your way or are simply uncertain of next steps. And if you have questions about the Code or our policies, ask your supervisor or contact one of the resources listed in the Code.

Remember, you are more than an employee. You are a steward of AM General, responsible for ensuring the ongoing growth and success of our business. It's not easy. But the fact that you're reading this Code means you're up for the challenge and ready to drive with passion.

**Thank you for your commitment to AM General, its Code of Conduct, and, of course, 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 PRACTICES

ANTI-CORRUPTION POLICY

BUSINESS EXPENSE (TRAVEL) POLICY

COMMUNITY INVOLVEMENT PROGRAM (CIP)

CONTRIBUTIONS, DONATIONS, AND SPONSORSHIPS

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

INSIDER THREAT PROGRAM PLAN

INTERNATIONAL TRADE COMPLIANCE POLICY

LOBBYING POLICY

NON-RETALIATION AGAINST WHISTLEBLOWERS  
AND 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

SOURCE EVALUATION AND SELECTION

SUPPLIER WEBSITE

TIME RECORDING POLICY

WORKPLACE VIOLENCE AND WEAPON-FREE  
WORKPLACE POLICY





## WHERE TO GO FOR HELP

Do you need additional guidance? AM General has a variety of resources to contact for help:



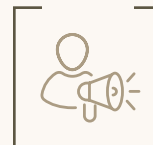
**To ask questions, report potential misconduct, or other ethical concerns**

Your supervisor or a member of senior management

Human Resources

**Legal Department**

The Ethics Hotline, accessible by phone at **1-800-344-6593**



**For media inquiries**

**Marketing**



**For sponsorships and endorsements**

**Legal Department**



**For analyst or investor inquiries**

**Investor Relations**



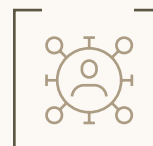
**For international trade inquiries**

**International Trade Compliance Department**



**To view Company policies**

**Visit the AM General Intranet site**



**For information security inquiries**

**Enterprise Information Security Office**



**For information about Company benefits**

**Human Resources**



**For general security concerns**

**Security (FSO) Office**



## PHOTO ATTRIBUTION

**Pg. 4:**

Photo by  
Maj. Joshua Frye, Military  
Intelligence Readiness Command.

**Pg. 6:**

U.S. Army photo by  
1st Lt. Brandon Miles,  
107th MPAD, FLARNG.

**Pg. 17:**

U.S. Army photo by  
Sgt. 1st Class Raymond Drumsta.

**Pg. 20:**

The 2-CT Ambulance is manufactured by AM General under a contract with the United States Army and built specifically in accordance with specifications provided to AM General by the U.S. Army. The red cross depicted in these materials is an independent licensed trademark of the International Red Cross and is applied to the vehicles manufactured by AM General in accordance with contract specifications.

**Pg. 23:**

U.S. Army photo by  
Staff Sgt. Jeffrey Smith/Released.

**Pg. 25:**

U.S. Air Force photo by  
Jeremy Larlee.

**Pg. 28:**

U.S. Army Reserve photo by  
Master Sgt. Michel Sauret.

**Pg. 32:**

U.S. Air Force photo by  
Senior Airman Joseph P. LeVeille.

**Pg. 33:**

U.S. Army National Guard Photo  
by Spc. Yancy Mendoza.

**Pg. 37:**

U.S. Navy photo by  
Photographer's Mate 1st Class  
(AW) Brien Aho.

**Pg. 43:**

U.S. Air National Guard photo by  
Senior Airman Dylan McCrink.

