

# AM GENERAL

MISSION READY ★ FUTURE DRIVEN

**SUPPLIER  
CODE OF  
CONDUCT**



**INTEGRITY:  
OUR UNIFYING FORCE**





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## WHO WE ARE: A MESSAGE TO OUR SUPPLIERS

At AM General, two core principals unite us all: a commitment to serve those who serve to protect us and a steadfast belief that integrity is the only road to success. These concepts are embodied in our **AM General Code of Conduct**. Our Code of Conduct articulates the core values that guide us and defines the high standards of professional conduct we expect from everyone who works with or for us—including our Suppliers.

To ensure our expectations are clear, we developed this **Supplier Code of Conduct (“Supplier Code”)**, applicable to suppliers, vendors, distributors, consultants, agents, and other third-party entities conducting business with us or on our behalf (“Suppliers”). Our Supplier Code highlights specific expectations and guidelines for all Suppliers of AM General. It also supports our commitments related to such things as regulatory compliance, product and service quality, anti-corruption, human rights, and responsible sourcing.

By adhering to our Supplier Code, you will do your part to make sure AM General is always mission-ready and future-driven. Together, we will accomplish many great things, bound by ***Integrity: Our Unifying Force***.



## WHAT WE VALUE

We are one team dedicated to producing the best products and providing the best services 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 and expect the same from our Suppliers.

## OUR MISSION AND VISION

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



## 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.



## COMPLIANCE WITH THE LAW

Each day, somewhere in the world, someone depends on AM General products and services to perform at the highest level. As you are a Supplier for AM General, they depend on you too. That is why we expect all our Suppliers to operate with integrity in every transaction.

Integrity begins with our shared commitment to following the law. We expect our Suppliers to meet all contractual obligations and to conduct business in full compliance with applicable laws, regulations, guidelines, industry standards, and this Supplier Code. This requires all our Suppliers to:

- ▶ *Train their employees on what is expected; and*
- ▶ *Communicate what is expected to their suppliers and other business partners.*

The expectations set forth in the Supplier Code are not intended to conflict with or modify the terms and conditions of your contracts with AM General. If a contract, legal, or regulatory requirement is more restrictive or conflicts with a requirement in the Supplier Code, Suppliers are expected to follow the more restrictive requirement. If it is not clear which requirement is more restrictive, Suppliers should seek guidance before proceeding.

We take non-compliance seriously and may pursue legal or other remedies against any Supplier who violates this Supplier Code or applicable laws when conducting business on our behalf.



# PRODUCT AND SERVICE QUALITY

AM General builds and maintains strong relationships with its customers by focusing on quality and safety. By following strict processes and procedures, AM General is empowered to meet or exceed our own internal standards as well as industry standards. To complement the quality of our products, AM General is committed to always providing service that is responsive, fair, and dependable. That is why we only partner with Suppliers who:

- ▶ *Understand and adhere to all applicable quality standards, regulations, and legal requirements, including the requirements outlined in the Supplier Quality Manual available at [AM General Supplier Resources](#);*
- ▶ *Follow all procedures and processes, updating when necessary and communicating changes;*
- ▶ *Commit to doing the right thing as part of their everyday routine;*
- ▶ *Never take shortcuts or make exceptions that could compromise the quality or safety of our products, services, and reputation;*
- ▶ *Identify and mitigate risks, address problems, and implement sustainable solutions;*
- ▶ *Maintain a focus on prevention, continuous improvement, and anticipation of customer needs;*
- ▶ *Deal honestly and fairly with all customers in every interaction, never seeking to manipulate or mislead;*
- ▶ *Make it easy for customers and other partners to work with them by removing obstacles to clear and effective communication; and*
- ▶ *Never make promises they don't intend to keep.*





# COMPANY ASSETS, CONFIDENTIAL INFORMATION, AND CYBERSECURITY



Trust is at the heart of all AM General's business relationships. As a Supplier, you may at times be entrusted with important AM General assets such as access to our facilities, equipment, or electronic systems. We expect Suppliers to always use good judgment with these resources, using them only for their intended purpose and in compliance with security best practices.

Your commitment to safeguarding AM General assets also applies to our intellectual property and other forms of confidential information. Whether this information concerns AM General, our employees, our customers, or other third parties, we expect our Suppliers to respect and protect it. Suppliers should only use confidential information for legitimate business purposes and disclose it only to those who have a right or business need to know the information. We require all Suppliers to sign non-disclosure agreements before any information is shared. Suppliers will help protect our information by:

- ▶ *Practicing cybersecurity measures and following all data protection laws;*
- ▶ *Reporting any data spills or breaches immediately to AM General;*
- ▶ *Only storing and sending Controlled Unclassified Information (CUI), Covered Defense Information (CDI), intellectual property, or data on secure and authorized devices and networks in accordance with applicable laws and regulations;*
- ▶ *Never allowing an unauthorized person to access or use AM General devices and information;*
- ▶ *Refraining from discussing AM General's confidential information in public places such as elevators, planes, and restaurants;*
- ▶ *Never inputting any confidential information belonging to AM General into unauthorized or public AI tools; and*
- ▶ *Never taking or sharing pictures of AM General facilities, data, or property without prior authorization.*



## HUMAN RIGHTS AND RESPONSIBLE SOURCING

Nearly every aspect of our business, from material sourcing to product distribution, can impact human rights. We are committed to playing a positive and protective role. We are determined to protect and uphold human rights and dignity everywhere we operate.

We expect our Suppliers to do the same by complying with all laws aimed at:

- ▶ **Upholding human rights**—Individuals within our supply chain should be paid a legal wage for hours worked, be assured of safe working conditions, and have the freedom to choose whether to work;
- ▶ **Providing conflict-free minerals**—Suppliers of raw materials, parts, and components will share our commitment to transparency and responsible sourcing; and
- ▶ **Counterfeit parts**—Suppliers must carefully vet and monitor their supply chain to verify the quality and authenticity of parts and materials used. Never attempt to misrepresent the quality or origins of parts through deception, misrepresentation, or fraud.

## RESPECTFUL WORKPLACE

We firmly believe that our unique differences and experiences power innovation and drive performance. That is why we are dedicated to making sure every employee feels comfortable and safe in our workplace, never forced to endure discrimination, intimidation, harassment, or bullying.

As one of our Suppliers, we expect an equal commitment to respect. We expect you to comply with all applicable laws and make employment decisions based on individuals' qualifications—never on protected characteristics, including gender, race, ethnicity, nationality, religion, age, military and veteran status, or physical or mental disability.



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## FAIR AND HONEST COMPETITION

AM General welcomes competition and wins business fairly and legally—through the strength of our products, services, and our people. Our Suppliers must also comply with antitrust and competition laws wherever they do business and avoid any conduct that could be construed to be anti-competitive. Never take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practices. Never enter into any kind of agreement with a competitor (formally or informally) that could restrict trade, limit production, or boycott others.

AM General is committed to treating people the way we want to be treated—fairly. Suppliers operating on AM General's behalf have an obligation to treat everyone—customers, employees, and other third parties—with honesty and fairness. Be open and transparent in every interaction on AM General's behalf.

## CONFLICTS OF INTEREST

We are committed to making business decisions that are objective and impartial, and we expect the same from our Suppliers. This means Suppliers must avoid any situation or relationship that creates—or appears to create—a potential conflict between their own interests and the interests of AM General. Conflicts can arise in a variety of situations but often occur in connection with employment or business opportunities, offers of gifts or entertainment, financial interests or investments, and outside board or advisory memberships. If you become aware of an actual or potential conflict of interest, disclose it immediately to your AM General contact or the [AM General Ethics Hotline](#) and seek guidance to determine the appropriate course of action.







## BRIBERY AND CORRUPTION

We conduct our business with integrity. We expect full compliance with anti-bribery and anti-corruption laws (including the U.S. Foreign Corrupt Practices Act) everywhere we operate. We strictly prohibit acts of bribery and corruption by our employees and by those acting on our behalf. Suppliers must never offer or accept anything of value to influence a decision or gain a business advantage. Ensure that you operate in accordance with the law, maintain accurate books and records, and choose third parties that do the same.

Suppliers prevent corruption by:

- ▶ *Ensuring gifts and other business courtesies are modest in value, infrequently offered, and related to legitimate business purposes;*
- ▶ *Reporting and documenting all business-related expenses;*
- ▶ *Using extra care with government and public officials, as the standards are more stringent; and*
- ▶ *Never paying facilitation payments to government officials.*

## INTERNATIONAL TRADE COMPLIANCE

We send our products to customers in locations all around the world and have a responsibility to honor all applicable trade laws—and we expect our Suppliers to share in this responsibility. All Suppliers must comply with trade laws and regulations, including export controls, economic sanctions, and import laws and regulations, in all jurisdictions where we do business. If you are someone who helps us conduct business across borders or with foreign nationals in the United States or abroad, know and comply fully with the requirements associated with the countries in which you operate. Screen customers, suppliers, and transactions to ensure compliance with all applicable requirements, obtain all necessary licenses and approvals, and always report complete, accurate, and detailed information.





# SAFETY, HEALTH, AND ENVIRONMENT

## ENVIRONMENTAL PROTECTION

We expect our Suppliers to act as responsible environmental stewards. This means complying with all applicable laws and regulations concerning environmental protection and waste disposal. It also means going above and beyond by continuously seeking new ways to reduce waste and increase sustainability. This commitment to stewardship includes holding your own suppliers and business partners accountable.

## WORKPLACE SAFETY

The safety and health of our people and our planet are top priorities at AM General. We expect our Suppliers to always provide safe, secure, and healthy work conditions by following all applicable health and safety laws, regulations, and policies. Suppliers can further our commitment to safety by:

- ▶ *Wearing personal protective equipment when required;*
- ▶ *Following our policies to keep our facilities secure; and*
- ▶ *Watching for and speaking up about potential risks.*

## RECORDS AND AUDITS

One of the ways AM General earns trust is through accurate and honest transactions and business records. Our Suppliers must also promote financial integrity by maintaining thorough and correct records, and by following all applicable laws and our internal policies and processes when creating, maintaining, retaining, or destroying records. Suppliers must promptly meet all payment and tax obligations related to their work with AM General.





## GOVERNMENT PROCUREMENT AND SPECIAL OBLIGATIONS

AM General proudly serves a variety of customers, including governments around the world. Our success in serving our customers stems from the products and services AM General and its Suppliers provide, and equally important, the way those products and services are delivered. Suppliers must share our commitment to procuring and fulfilling government contracts with integrity by meeting the many legal, regulatory, and contractual requirements that apply to our government work. That includes rules about bidding, accounting, invoices, subcontracting, employment practices, contract performance, protection of confidential and classified information, purchasing, and other matters.

Suppliers help AM General meet these requirements by always adhering to:

- ▶ *The Federal Acquisition Regulation (FAR);*
- ▶ *The Defense Federal Acquisition Regulation Supplement (DFARS);*
- ▶ *Applicable foreign government procurement regulations;*
- ▶ *International trade agreements;*
- ▶ *Import/export laws; and*
- ▶ *Industry regulations.*

## WORKING WITH YOUR BUSINESS PARTNERS

We carefully vet and monitor all Suppliers to ensure they share our core values and our commitment to conducting business with integrity and in compliance with the law. We expect our Suppliers to do likewise, by:

- ▶ *Basing sourcing decisions on objective criteria such as quality, price, service, delivery record, and the third party's reputation for operating ethically and lawfully; and*
- ▶ *Monitoring their performance to ensure the highest standards of integrity—including the avoidance of any conflicts of interest; compliance with anti-bribery and anti-corruption laws, and applicable acquisition regulations; and the protection of confidential information.*



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## RISK MANAGEMENT

AM General believes in proactively managing risk and encouraging every member of our team to stay vigilant and speak up about potential risks before issues arise. We do this by maintaining an open-door policy that includes a strict commitment to non-retaliation against whistleblowers, and we expect our Suppliers to do the same. Suppliers should create, promote, and maintain a culture of proactive risk management throughout their operations and across their own supply chains.



## CONSEQUENCES OF VIOLATIONS

Our Supplier 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 other third parties. Any Supplier who violates this Supplier Code, AM General policies, or the law will be subject to possible termination of their agreement with AM General, as well as potential civil and criminal penalties.



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# INCIDENT REPORTING AND SHARING CONCERNS

We encourage Suppliers to come forward with any questions about this Supplier Code or other concerns. We also expect them to come forward if they see or suspect a violation of the Supplier Code or the law in connection with the work they do for us.

Our Suppliers may report concerns to their AM General contact or through our Ethics Hotline.



## 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**.

