

# Standards of Business Ethics and Conduct

6th Edition, 2022



**GENERAL DYNAMICS**



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# Message from the CEO

Dear Fellow Employee:

Ethical business conduct isn't just a part of what we do — it is the heart of everything we do. Our culture of consistently doing the right thing for our employees, customers, and stakeholders has made General Dynamics what it is today, and it is what will continue to propel us forward in the future.

We are a global company of diverse people doing a broad range of business activities across different segments. Our ethos is what unites us and gives us a shared commitment to maintaining the highest standards of ethics and integrity in everything we do.

The intent of the General Dynamics *Standards of Business Ethics and Conduct*, which we call the *Blue Book*, is to give you the tools necessary to embed ethical decision-making into all aspects of your work, and to confidently address ethics-related questions as they arise. However, our ethos is about more than just following laws and policies. It is about relentlessly striving to adhere to our core values of transparency, honesty, trust and alignment.

Read the *Blue Book* carefully and refer to it regularly. These are the principles upon which this company is built, and which ensure we fulfil our duty to act responsibly towards our customers, investors, employees and communities. Each of us has a duty to uphold the high standards that made the company great.

Sincerely,



Phebe N. Novakovic  
Chairman and Chief Executive Officer

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# Our Ethos

Our ethos is our distinguishing moral nature.  
Our employees are a community of people dedicated to this ethos.

Each of us has an obligation to behave according to our values. In this way, we can ensure we continue to be good stewards of the investments in us by our shareholders, customers, employees and communities, now and in the future.

Our ethos underpins our culture, our business model, and our daily interactions. These values are a constant reminder of who we are and what we do, every single day.

## **They drive how we operate our business.**

We pursue operating excellence by anticipating customer needs; driving innovation; improving processes; and reducing waste, emissions and energy consumption. We believe in being wise stewards of capital and resources.

## **They govern how we engage with our employees, customers, partners and suppliers.**

We must be forthright and open to change. We seek employees, partners and suppliers that adhere to these values in their business activities and we hold them to the same high standards we have for ourselves.

## **They guide our interactions with each other.**

As a community of people, we are dedicated to our company's purpose and to promoting the health, wellbeing and safety of our employees. We treat each other with dignity and respect, celebrating

our similarities as well as our differences; by making an effort to understand and support one another by promoting inclusive work environments.

## **They ensure fair compensation and equal employment opportunity in principled and productive workplaces.**

Our values motivate us to promote strong organisational practises with diversity, opportunities for career development and training. We stand behind basic universal human rights, including that all employment must be voluntary. We unequivocally oppose human trafficking in all forms.

## **They connect us with our communities.**

Fulfilling our obligation to be a good corporate citizen means that we engage in actions that further the wellbeing of our communities. We do this by supporting participation in social welfare organisations; promoting volunteerism; and undertaking initiatives to mitigate climate change, drive out hazardous waste from our processes, and protect water resources.

RULES WE LIVE BY, IN ALL THINGS, AT ALL TIMES

Transparency

Honesty



Trust

Alignment

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# Business Ethics Principles

We are in business to earn a fair return on behalf of our shareholders.

## Use assets wisely

- How we manage assets reflects our personal values and our company's values, and determines our ability to earn a fair return.

## Offer a fair deal

- We offer the best products at a reasonable price.
- We make hard decisions and tackle tough choices.
- How we go about making these decisions reflects our values.

## Deliver on promises

- We're people of our word who deliver on our promises.
- We're responsible to our stakeholders and earn their trust every day.

## Earn a fair return

- Our reputation is based on our ability to use our values to generate profits.
- Because we deliver on our promises, we must endeavour to ensure a fair return.

Our business conduct reflects our business ethics principles.



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# Business Ethics Model



## We Are Responsible to Our Stakeholders

Shareholders • Customers • Each Other  
Suppliers • Communities • Countries

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# About This Booklet

## A Practical Reference

Each day you will face and make decisions that are critical to our success. This booklet is a practical reference that you can use to get the information you need to make good decisions. You will also learn when to contact your business unit's ethics officer and other helpful resources.

Over the years, this booklet has become known as the *Blue Book* after the colour of its cover. Use the *Blue Book* in conjunction with our ethos and the policies, procedures and work rules of your business unit to guide your actions as you do your job. While the *Blue Book* isn't an employment agreement, it is meant to set the basic expectations that this company has of your performance.

The *Blue Book* applies to all officers, executives, and full-time, part-time and temporary employees of General Dynamics. We expect our suppliers, vendors, contractors and joint venture and other business partners to behave ethically and to develop compliance programs which are consistent with our values in all material respects. Only the Board or an authorised Board Committee may grant an amendment or waiver of this *Blue Book* for executive officers of the Corporation. Any amendments or waivers will be publicly disclosed if required by law or applicable stock exchange regulations.

## Business Ethics and Compliance

When we talk about business ethics, we refer to the commitments that make our company great. We deal fairly with our company's customers, suppliers, and competitors, as well as with each other. Each of us should have these qualities.

- A law-abiding attitude;
- Honesty and trustworthiness;
- Responsibility and reliability;
- Fairness and cooperativeness.

When we talk about compliance, we refer to the laws, rules, regulations and policies that control and direct our actions as well as those of our company. The *Blue Book* includes information about the ethics and compliance aspects of business conduct.

## Global Reality of Our Work

We conduct business in numerous countries around the globe. Our employees are citizens of different countries and belong to diverse cultural groups. We are subject to the laws and regulations of all the countries, states, and municipalities where we have operations and do business. Our worldwide presence subjects us to the regulatory and legal control of many jurisdictions at the same time.

We must recognise the global reality of our work. In some instances, there may be a real or apparent conflict between the laws of two or more countries. In that event, you must obtain legal advice immediately to understand how to resolve the conflict properly.

## Getting Answers

This *Blue Book* doesn't contain an answer for every situation. Each of us has faced a time where the right course of action was hard to determine. Perhaps the facts were complex. Maybe many individuals could be affected by our decision. Perhaps a "good" choice was just not obvious, or our personal interests conflicted with the best interests of General Dynamics. We might not have had the information needed to make an informed choice.

You have many resources to help you with questions about ethics and compliance. If you know the answer to an ethics question and are comfortable with your decision, you can act with confidentiality. If not, you have several places where you may turn for advice and guidance:

- General Dynamics Standard Practises and Policies;
- Your supervisor or manager;
- Your local ethics office representative;
- Your business unit's ethics officer;
- The Human Resources Department;
- The Environmental, Safety, and Health representative;
- The Security Department;
- The Finance or Internal Controls Department;
- The Legal Department;
- The International Trade and Compliance Department;
- The General Dynamics Corporate Ethics Office;
- The General Dynamics Ethics Helpline.

Contact information for the business unit and corporate ethics officers is available on the Ethics Helpline website under Additional Resources at [www.gd.ethicspoint.com](http://www.gd.ethicspoint.com). On the website, you can also find toll-free Helpline telephone numbers from every country in which General Dynamics has employees. (A partial list appears at the back of this book.)

## Making Tough Decisions

The information in the *Blue Book* will help you work through most difficult business issues and dilemmas. However, the answers to some problems aren't obvious. Some things may feel right but may not actually be right, so take the extra time to think things through before you act.

Follow the steps in our Ethical Decision-making Model:

- Have I reviewed the facts carefully?
- Have I used the resources available to me?
- Have I considered all the issues?
- Have I thought carefully about my options?
- Have I considered the consequences of my choices?
- Do I need to consult with someone about the situation?
- Will my decision stand the test of time?

The Ethical Decision-making Model is a tool to help employees make good decisions. It can be found on the Ethics Helpline website at [www.gd.ethicspoint.com](http://www.gd.ethicspoint.com).

If you are still not sure what to do, speak up and get the advice you need. Keep asking questions until you are certain you are doing the right thing. General Dynamics will not retaliate against any person who brings to our attention in good faith an ethics or compliance issue.

**Remember: When in doubt, seek advice before you act.**

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# Conducting Our Business

Certain rules govern how we conduct our business every day.

## **Antitrust, Sales Practises, and Competitive Information**

Antitrust and competition laws prohibit agreements that eliminate or discourage competition. Violations of these laws carry stiff monetary fines and prison terms. We comply fully with the antitrust and competition laws of every jurisdiction where we do business.

We are committed to fair and competitive sales practises. We will not engage in practises which would unfairly limit trade or exclude competitors from the marketplace. We will not communicate formally or informally with competitors to fix or control prices, allocate markets, boycott customers or suppliers, or limit the sale of products.

We will not make false statements regarding our competitors, nor will we conspire to improperly gain or use their proprietary information.

Regarding antitrust laws and competitive practises, you have the following responsibilities.

- Avoid even informal or casual conversations with employees of our competitors regarding prices, products or customers;
- Never make inaccurate or malicious statements about our competitors.

## **Conflicts of Interest**

A conflict of interest occurs when your private interests interfere — or appear to interfere — with the interests of General Dynamics. You should base business decisions on our company's needs, rather than your own interests, the interests of family or friends, or your desire for personal gain. You should not do business with organisations in which you, or your family, have a substantial financial interest. Each of us should deal with suppliers, customers and others in ways that avoid even the appearance of a conflict between our personal interests and those of General Dynamics. Talk to your business unit's ethics officer and disclose any situation that presents or might present a conflict of interest.

The following situations can easily give rise to conflicts of interest:

### **PERSONAL BUSINESS RELATIONSHIPS**

You should disclose to your business unit's ethics officer any substantial interest that you or an immediate family member might have in our suppliers, customers or competitors. Ownership of stock in a publicly traded company which is a competitor could create real or potential conflicts of interest for you and our company. Be careful that your personal business relationships don't influence the decisions you make on behalf of General Dynamics.

ORGANISATIONAL RELATIONSHIPS

If you or an immediate family member serve as a director, officer or consultant for any company that does business with us, you must disclose these obligations to your business unit's ethics officer even if this service is unpaid.

OUTSIDE EMPLOYMENT

Before you accept outside employment, consider whether this second job could create a conflict of interest with your work here or negatively impact your ability to do your job. Taking a second job can be tricky because you may not always see clearly where your loyalties should lie. Do not accept outside employment with our competitors, suppliers, or customers.

**Gathering Competitive Information**

Properly gathered business information is valuable. However, you should only gather information about our competitors from public sources which are freely available to others. Never spy or steal in order to obtain competitive information. Likewise, we abide by all rules of integrity in procurement. We neither seek nor accept tender or bid information outside appropriate channels. Seek advice if you think someone is giving you confidential information that you should not have. Unless disclosure is authorised, protect all commercially sensitive information that you obtain through your work.

**Gifts and Hospitality – Commercial Customers**

GIFTS

We compete solely on the merits of our products and services. When people exchange gifts in

a business context, it can look as if favours were granted in order to influence business judgement. We may provide gifts, meals, refreshments, and entertainment of reasonable value in the course of doing business with commercial customers or non-government personnel, provided that this practise doesn't conflict with our standards or the standards of the recipient's organisation. You should not give or offer any gift, or anything of value, if such a gift might appear to be improper.

RECEIPT OF GIFTS

Generally, you should not accept gifts, meals, or entertainment from those with whom we do business unless this activity serves a legitimate business purpose and is appropriate for the relationship. You may accept small gifts that are of modest value only.

When conducting business in some countries, it may be customary to accept gifts of substantial value. These gifts are company property and must be reported to your business unit's ethics officer for disposition. For example, they can be purchased from the company at fair market value, or donated to an appropriate charity on behalf of General Dynamics.

Regarding the giving or receiving of gifts, you have the following responsibilities.

- Do not offer or provide gifts when prohibited by the recipient's rules, standards, and policies;
- Avoid giving or receiving gifts above modest value when dealing with commercial customers;
- Ensure meals and entertainment have valid business purposes;
- Before offering or retaining any gift of greater than nominal value, consult your business unit's ethics officer.

### Insider Information and Securities Trading

You may learn of material information related to General Dynamics or other companies before the general public knows about such information. This type of information is called “insider” information. You may not buy or sell stock based on such insider information, nor shall you pass insider information on to someone else who then buys or sells stock, until this information has been publicly released. These rules also apply to more complex transactions including options, puts and calls as well as to techniques such as selling short. The best way to know if information is public is if it is accessible through public channels to include newspapers, television or the internet.

To comply with the securities laws of the jurisdictions where we do business, you have the following responsibilities.

- Never make securities trades based on non-public information;
- Never tell others to make securities trades based on non-public information;
- Do not pass insider information to someone who has no need to know.

### International Business

General Dynamics is a global business, headquartered in the United States. We follow the laws and regulations of all of the countries and jurisdictions where we do business.

Outside of your home country, you may encounter unfamiliar rules, regulations, business customs, manners and cultures. Become familiar with other countries’ commercial practises, so we don’t embarrass our company, our business partners, or ourselves. If a conflict arises with respect to the laws of two or more countries, contact the Legal Department for assistance.

We abide by the laws and regulations regarding the import and export of our products, information (e.g., technology and technical data), and services, including the U.S. International Traffic in Arms Regulations (ITAR)

and the Export Administration Regulations (EAR). Nearly every country has laws and regulations that control the international movement (e.g., imports, exports, re-exports, and technology transfers) of certain products, information (e.g., technology and technical data) and services. These laws and regulations may also restrict the transfer of controlled information to certain people, whether inside or outside your country. In addition, there are laws and regulations that prohibit dealings with “sanctioned” or “embargoed” countries, governments, companies, and individuals. We also abide by all applicable anti-bribery laws and regulations. The Legal Department can provide additional assistance.

When doing business in any country, you have the following responsibilities.

- Keep current with all laws and regulations applicable to your work;
- Know and follow the laws regarding export and import of our products, information (e.g., technology and technical data), and services;
- Conduct careful due diligence before engaging third parties to represent our interests, and remember that third parties can't do anything which is prohibited. Working with international subject matter experts, take care to select consultants, sales representatives, distributors, and other international intermediaries which exhibit ethical and compliant behaviour

### Lobbying and Political Contributions

Lobbying and political contributions are highly regulated activities, and violations of these laws can include criminal penalties. Consequently, you must not contribute any company funds or other resources, either directly or indirectly, to any political candidate, party, or political advocacy group or to organisations associated with honouring a political figure without prior approval from the Corporate Government Relations Department, for U.S. political contributions, or the president of your business unit with notification to Government Relations, for non-U.S. political contributions. Similarly, all lobbying contacts with U.S. covered legislative

branch or covered executive branch officials on General Dynamics' programs or issues must be approved by the Corporate Government Relations Department. This includes urging third party groups such as chambers of commerce to lobby on behalf of General Dynamics. As a private citizen, we encourage you to participate individually in political affairs with your own time and resources.

### Obeying the Law

General Dynamics operates in a highly regulated environment. Many governmental entities direct how we conduct our business. We comply strictly with the requirements of all of the governments and agencies with whom we do business.

We cooperate with government inspections and are courteous to inspectors. Notify the Legal Department immediately if you learn about any inspection, investigation, or request for information from any outside organisation.

During an inspection, never destroy or alter any documents, lie to or mislead an inspector, or obstruct the collection of information. The Legal Department will assist you in reviewing any information requested by an inspector before it is released.

### Record Keeping

We keep accurate records of all financial and business transactions. Our record-keeping procedures are essential to ensure all costs are properly charged.

It is your responsibility to record all costs accurately and to follow all accounting procedures. No false or misleading entries should be made in our books and records.

You must carefully follow our policies on document retention, including electronic documents and e-mails. Never destroy any documents that you believe might be relevant as evidence in any civil, criminal, or regulatory proceedings. Doing so could expose you and the company to severe penalties.

### Quality and Testing

The quality of our products is crucial to our success. All of our products and services must meet appropriate inspection, testing, and quality criteria in accordance with contract and government requirements. You should complete all test documentation accurately and promptly. With respect to quality and testing, you have the following responsibilities.

- Take personal responsibility for ensuring product quality;
- Know which tests you must perform;
- Know how you should carry out these tests;
- Record test results accurately.

### Suppliers, Consultants, Part-time Employees, and Temporary Workers

We select our suppliers, consultants, part-time employees, and temporary workers based on objective criteria such as price, quality, and prior performance and expect them to exhibit ethical and compliant behaviour.

When dealing with suppliers or consultants, you have the following responsibilities.

- Require competitive bids where appropriate;
- Fairly evaluate all proposals for work;
- If dealing with suppliers or consultants in the United States, or if appropriate in other jurisdictions, investigate opportunities to encourage small or minority-owned businesses to work with us;
- Get legal advice regarding doing business with former employees or board members, or current or former government employees to include service members;
- Do not accept gifts of more than modest value;
- To ensure meals provided by a supplier or consultant serve a valid business purpose and are appropriate to the relationship.

As a condition of employment, part-time or temporary workers are required to follow the *Blue Book*, as well as corporate and business unit policies and practises.

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# Working with Government Customers and Public Officials

We are a leader in the defence industry. We provide services and products to many governments around the globe. The laws and regulations which pertain to doing business with government customers and public officials are complex. When working with government customers and public officials, you must be vigilant to ensure full compliance with all laws and regulations. This is critical to our company's reputation.

## **Bribes and Kickbacks**

We don't engage in bribery or kickbacks. A bribe or kickback is the giving or accepting of money, fees, commissions, credits, gifts, favours, or anything of value which is either directly or indirectly provided in return for favourable treatment of any kind. You must never offer, give, ask for, or receive any form of bribe or kickback. Favourable treatment often can appear innocent, such as paying an invoice earlier than we normally would. However, giving a gift or anything of value is illegal when offered in exchange for favourable treatment.

## **Billing and Pricing**

We are clear and accurate in every aspect of our billing and pricing. Our prices reflect the cost to design and produce our products, our level of effort, market conditions, and other relevant factors. Invoices must be clear and understandable. Overpayments will be returned promptly upon discovery.

Bills to customers must be timely, accurate, and honest. It is unlawful to present a false or fraudulent claim to any government customer. We must never improperly shift costs between contracts or projects.

When engaged in billing and pricing, you have the following responsibilities.

- Be accurate in pricing;
- Charge and bill appropriate projects;
- Do not split invoices to hide costs or avoid payment procedures;
- Ensure invoices are accurate, timely, and complete.

## **Contract Compliance**

We comply with all of the terms of our contracts. We deliver the goods and services as promised. We never substitute material, change testing, or alter quality control requirements except in accordance with applicable government procedures. We never certify that something has been tested when it has not been.

To comply with the terms of our contracts, you have the following responsibilities.

- Document how General Dynamics has met its contract obligations;
- Do not make substitutions without following government procedures;
- Perform all tests in accordance with the terms of the contract.

## **Gifts and Hospitality — Government Customers**

We compete solely on the merits of our products and services. We never try to influence a customer's decision to purchase from General Dynamics by offering gifts, meals, entertainment, or anything else of value. Most governments have regulations prohibiting their employees'



acceptance of items of value from contractors or suppliers. We carefully follow these regulations and policies when dealing with government officials and their representatives, both from the United States and around the world. These regulations can be complex, so make sure you understand them. Seek guidance from your business unit's ethics officer, who will consult the Legal Department as appropriate.

The giving of gifts, meals, or anything of value to government and public officials is almost always prohibited. Never give money or anything else of value to a government or public official for the purpose of improperly influencing an official decision or obtaining or retaining business. Consult your business unit's ethics officer before offering anything of value to a government or public official. Before making any payments to facilitate routine government action, you must get advance approval from the Legal Department. In addition, any gift given to a government or public official must be in compliance with General Dynamics' policies and be recorded accurately in our books and records.

### **Hiring Current or Former Government Employees**

In some of the countries where we do business, the law restricts the hiring or retaining of certain government employees who were involved in awarding or administering government contracts to General Dynamics. Get advice from the Legal Department before recruiting, interviewing, hiring, or assigning work to current or former government employees, to include military service members.

### **Mandatory Disclosure**

We comply with all applicable regulations that require us to disclose to a government customer suspected instances of misconduct involving fraud, conflict of interest, bribery, illegal gratuities, certain errors in billing and pricing, or customer overpayments. The consequences of

failing to disclose these types of violations may be grave. If you suspect any of these violations, seek advice promptly from your business unit's ethics officer or the Legal Department.

### **Procurement Integrity**

We follow our customers' procedures for awarding contracts. We will not ask for disclosure of the proprietary information of our competitors, nor will we ask for source selection material—the material used to evaluate competing bids. We neither seek nor accept confidential information regarding a tender or its process outside regular, approved channels. We are careful not to share any of our own proprietary information with government officials who aren't on the government's list of approved persons. We don't discuss employment or offer anything of value to those who participate in the procurement process for our goods and services.

### **Security of Government Information**

We have a continuing obligation to protect classified information. We will not seek access to information for which we don't have proper clearance and the need to know.

It is your responsibility to follow all company and government procedures for handling classified information and controlled unclassified information.

### **Time Charges and Expense Reporting**

We bill our customers honestly for our work. We charge our time and expenses consistently with company accounting procedures. It is your responsibility to record your time and expenses carefully, promptly, and accurately. Any employee, consultant, or contract labour personnel found to be mischarging is subject to disciplinary action up to and including termination of employment or termination of the assignment/engagement. If you knowingly make false time charges, you may be accused of a crime.

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# Working Together

We are proud of the commitment and dedication of our employees. We recognise that others depend on us to do our jobs as we count on them to do theirs. We take pride in the contributions we make to the communities where we live and work.

## Workplace Values

At the core of our belief system is a fundamental respect for human rights and the dignity of each individual. Each person makes a difference in our world, and we believe that diverse perspectives make us stronger. In our company, we strive to create an ethical and inclusive culture that treats people from all walks of life fairly and with dignity and respect. We compensate our employees fairly, based on market rates, and we value the contributions that they make to our company.

## Human Rights

We stand against human trafficking and exploitation of any kind. As a corporation with operations and suppliers around the world, we recognise the importance of ensuring that respect for human rights and dignity is embedded at all levels of our business. Strict adherence to these values, as well as to applicable laws, are expected by us everywhere we operate. General Dynamics doesn't tolerate human trafficking, child labour or forced labour anywhere within our businesses or supply chains.

## Equal Employment Opportunity

Our success depends in great part on our work environment. We support a positive environment in which all individuals may grow, contribute, and participate free from discrimination.

We are committed to legally compliant human resource policies and practises in all aspects of employment, including: recruiting, hiring, evaluation, training, discipline, and work opportunities, career development, compensation, promotion, and termination. We do not tolerate unlawful discrimination of any kind. We encourage and promote inclusive work environments.

To ensure respectful and fair treatment for all employees, you have the following responsibilities.

- Treat your fellow employees as equals, regardless of race, colour, religion, sex, pregnancy, national origin, mental or physical disability, age, veteran status, sexual orientation, gender identity or expression, transgender status, or marital status;
- Understand and abide by all corporate and business unit policies, procedures related to employment and workplace fairness.

## Workplace Harassment/Violence

Workplace Harassment includes statements and actions that denigrate or show hostility toward an individual or group because of race, colour, religion, sex, pregnancy, national origin, mental or physical disability, age, veteran status, sexual orientation, gender identity or expression, transgender status, or marital status. Each of us has the right to be free from improper or offensive conduct at work. Unwelcome, insulting, or offensive remarks or actions have no place at our company.

To maintain a workplace free of harassment, you have the following responsibilities.

- Understand and abide by all corporate and business unit policies, procedures, and work rules relating to workplace conduct;

- Exercise good judgement in professional and personal relationships with co-workers.

Sexual harassment can occur under many different circumstances. In general, sexual harassment occurs with the following.

- Requests for dates, sexual favours, or other verbal or physical conduct of a sexual nature serve as the basis for job benefits or employment decisions;
- An intimidating, offensive, or hostile work environment results from unwelcome sexual advances, offensive jokes, or other insulting verbal and physical behaviour.

We don't tolerate violent behaviour at any workplace, whether committed by or against our employees. The following behaviours are prohibited: making threatening remarks, causing physical injury to someone else, intentionally damaging someone else's property, or acting aggressively in a way that causes someone else to fear injury.

Use good judgement and promptly inform your supervisor, manager, Human Resources, or Security if you observe behaviour that could be dangerous or violent.

## Safety and Health

We follow the laws and regulations of the jurisdictions where we work regarding workplace safety and health. We take the necessary precautions to protect our colleagues and ourselves. To the extent consistent with law, we prohibit the possession of any firearm or weapon on company property without authorisation from the Security Office.

To maintain the safety of our workplace, you have the following responsibilities.

- Report all safety hazards, accidents, and work-related injuries;
- Follow the rules of your business unit concerning smoking during work hours while on company property;

- Report all suspected violations of safety procedures to your supervisor or safety and health department.

## Corporate Citizenship and Community Engagement

General Dynamics is committed to corporate citizenship and actively supports the communities where employees live, work, and do business. We want to support our communities and strive to do so through partnering with local service organisations and encouraging employee engagement in volunteer opportunities and community events on your own time or during work periods with management approval.

## Privacy and Personal Information

General Dynamics respects the privacy of its employees and the sensitivity of some information that we acquire from employees in the course of their employment or in the course of doing business. We use the personal information of employees only for valid business purposes in accordance with our written policies regarding specific categories of personal information. We use technology and robust standards to protect the security of that information against unauthorised use or disclosure.

## A Drug-free Work Environment

We strive to maintain a workplace which is free from the effects of drug abuse. Illegal drug use or abuse of controlled substances jeopardises our ability to serve our customers and can compromise the safety of our operations and the quality of our products and services. We don't tolerate any use of illegal drugs or abuse of controlled substances while employees are engaged in General Dynamics' business, or while working at a company location.

You should report all known or suspected violations to your supervisor or manager.

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# Protecting Our Resources

We are entrusted with the company resources and assets which are necessary in order to do our work. We are responsible for safeguarding company funds, information, records, tools, and property.

## **Company Resources, Proprietary Information, and Intellectual Property**

The assets, property, and resources of General Dynamics are chiefly intended for business purposes. Company resources include but aren't limited to telephones, electronic mail, Internet access, voice mail, faxes, computers, equipment, machinery, and vehicles. Subject to local requirements, we permit reasonable use of communication devices for appropriate personal use provided it doesn't interfere with job performance or compromise the security or integrity of our network or systems.

Managers may authorize personal use of company resources where such use doesn't occur during working periods. This use must not last long or occur frequently, nor may it consume a significant amount of company resources.

Business opportunities are also company assets. Do not take for yourself any business opportunities you discover through the use of company resources. It is everyone's duty to advance General Dynamics' legitimate business interests when we have the chance to do so.

Our intellectual property is a valuable asset. This includes copyrights, patents, trade secrets, trademarks, ideas, inventions, and processes. We respect and protect intellectual property, whether it belongs to us or to others. General Dynamics owns all inventions, discoveries, ideas, and trade secrets created by employees on the job or produced using company resources.

You may have access to proprietary or confidential information of the company or our customers that must be protected from unauthorized use or disclosure. The duty to keep information confidential continues even after you leave our company. You also have a duty to report instances when company proprietary information is compromised or misused by other employees or a malicious insider.

## **Data Privacy**

During the course of your work, you may handle data that may include personal and sensitive information about our employees, job applicants, shareholders, board members, customers, vendors and other third parties. Safeguarding this information is critical and must be taken very seriously. When collecting these data, collect the least amount of information necessary to meet our business needs and ensure the information collected and stored is used for valid business purposes only and in accordance with written policies and procedures which are updated regularly to maintain compliance with national and global data privacy laws and regulations. Contact your Privacy, Legal, and Security departments for guidance when collecting, using or storing personal and sensitive data and when entering into contracts with third party vendors doing this on General Dynamics' behalf.

## **Customer Privacy**

Our business is based on information. You may have access to sensitive, confidential, or proprietary information about our customers and others with whom we do business. We earn their trust by protecting the privacy of their information.

## Environmental Protection and Sustainability

We protect the environment of the communities in which we work. In all jurisdictions where we do business, we comply with environmental protection laws and regulations. We also have initiatives to cost-effectively minimise the environmental impact of our operations, maximise the efficiencies of our products, and reduce waste, emissions and energy consumption.

To protect the environment, you have the following responsibilities.

- Follow all environmental guidelines and procedures for handling and disposing of waste and hazardous materials in the workplace;
- Prevent and report any spills or leaks;
- Report to your supervisor or manager any actions that may adversely affect the environment.

## Information Technology

Like all of our other assets, our information technology is a company resource that must be used ethically and responsibly to further our company's business. You should never use our technology or systems to support a personal business or political venture. We protect our computer systems from access by unauthorised parties and count on your vigilance to identify and report suspicious activity on information systems.

Most of the software we use is licensed for business use only. Unless expressly permitted, software programs may not be copied for business or home use or shared with others.

When using information technology, you have the following responsibilities.

- Safeguard all computer equipment and information;
- Exercise vigilance when operating information systems, and report suspicious activity immediately;
- Do not use software without an appropriate license;
- Do not share computer passwords;

- Do not copy or distribute software in violation of license terms;
- Do not put anything in writing if you would regret seeing it in the media.

## Internet Use

Supervisors and managers may permit Internet use during non-working periods, for example, during breaks, lunch, etc. However, Internet access should not be used to support a personal business or political venture, violate any of the standards in this *Blue Book*, or embarrass General Dynamics. You may never use the company's Internet access or telecommunications services to download, view, send, or forward any information which is sexually explicit, discriminatory, derogatory, illegal, profane, or abusive.

## Our Name and Reputation

General Dynamics is proud of its name and reputation. Public perception is critical to our continuing success. We provide accurate and timely information about our business to our investors, the media and the general public. We are very thoughtful and deliberate about what we say when releasing information publicly.

If you receive an inquiry from the media, notify your respective business unit or Corporate Communications Department and let them respond.

Be cautious about identifying yourself as a General Dynamics employee on social media, and recognise that when you do, your actions could reflect on the company.

Always remember, you are a reflection of General Dynamics, in your action, your inaction, and in your words. You are entrusted with that responsibility which can impact our name and reputation.

## Right to Inspect

Where permitted by local laws and regulations, the company may exercise its rights to inspect its property, electronic communications, and all other resources and assets.

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# Taking Action

Each of us has a responsibility to act ethically. We must accept and fulfil our duties out of respect for each other.

## Our Ethics Program

At General Dynamics, our ethos underpins our culture, our business model, and our daily interactions. These values are a constant reminder of who we are and what we do, In All Things, At All Times. We believe that management and employees share accountability for business ethics. The company provides tools and resources to help all of us understand and maintain our standards of ethical business conduct. Aligned with our ethos, General Dynamics' managers, employees and resources form the foundation of our ethics program.

## Global Realities

In some jurisdictions there are different requirements and regulations for how we communicate and regulations for how we handle ethical concerns. Get guidance from your business unit's ethics officer or the Legal Department to learn the rules as they apply to your location.

## Managers and Supervisors

Managers and supervisors are expected to provide timely advice and guidance to employees on ethics and compliance concerns. The more openly we discuss business conduct and our standards, the clearer we'll be about what is expected. Managers and supervisors should:

- Lead by example;
- Read, understand, use, and conduct daily interactions in compliance with our ethos, the *Blue Book*, and company policies;

- Affirm the need to follow the laws, regulations, and policies concerning our business;
- Encourage employees to ask questions and get advice before they act;
- Consult with your business unit's ethics officer;
- Implement control measures to detect compliance risks of non-compliance;
- Listen attentively when employees raise ethics questions and concerns;
- Take prompt action to respond to questions and correct problems;
- Foster an environment of trust, in which employees can speak up without fear of retaliation;
- Update individuals who report concerns and provide closure to the greatest extent possible.

## Employees

As an employee, you have the following responsibilities.

- Read, understand, use, and conduct daily interactions in compliance with our ethos, the *Blue Book*, and company policies;
- Learn the details of the policies that specifically impact your work assignments;
- Use the resources available to you for guidance and assistance;
- Take the training required to do your job;
- Perform your job in accordance with our business ethics standards;
- Hold co-workers accountable for ethical work standards;
- Share concerns about possible ethical misconduct with your supervisor, ethics officer, another member of management, or the Ethics Helpline;

- Cooperate with any internal investigations about a reported ethics or compliance-related matter.

If you're uncertain about the right course of conduct, please ask questions and get answers before you act.

### Tools and Resources

General Dynamics updates and distributes the *Blue Book* to all employees. Through training and communication, we convey to employees our Standards of Business Ethics and Conduct. We enforce compliance with these standards.

We provide the following tools and resources.

- Policies and procedures;
- Training and education;
- Confidential resources where you can ask questions, get advice, and report concerns;
- The General Dynamics Ethics Helpline, available on the web at [www.gd.ethicspoint.com](http://www.gd.ethicspoint.com) or via toll-free numbers on page 24 of this book;
- Ethics and compliance offices in the business units and at corporate headquarters.

All questions, conversations, calls, and reports made in good faith will be taken seriously. We will investigate all reported concerns — promptly and with confidentiality — and resolve those concerns appropriately. If we find that our standards have been violated, we will take action, including imposing disciplinary action, implementing system-wide changes, or notifying the right government office or agency as appropriate. Not only will we deal with a specific situation, but we will also make changes so that similar problems don't occur.

### Confidential Conversations

Conversations with your business unit's ethics officer are treated confidentially, consistent with our legal obligations and policies. You will be told if your identity is needed to address your question or concern satisfactorily.

All calls or contacts made to our Ethics Helpline are confidential and won't be traced. We will attempt to protect the identity of anyone who makes a good faith report or inquiry consistent with our legal obligations.

### How the Ethics Helpline Works

While most questions and concerns can be resolved by discussing them with your manager, the Ethics Helpline provides an additional way to get help, should you feel uncomfortable talking to management about an issue. The helpline isn't intended to replace conversations between employees and managers, but rather to provide an additional resource to employees.

You can contact the Ethics Helpline at any time to ask a question, express a concern or report a possible violation of laws, regulations or policies.

Reports to the helpline may be made confidentially or anonymously. However, whenever possible, identify yourself when contacting the helpline. Anonymity may hinder our ability to obtain information needed to assist with our investigation and will limit our ability to provide updates as the investigation progresses.

When reporting a concern, you may be asked to provide the time, location, names of the people involved, and other details so we can investigate your concerns. Every report is handled promptly, discreetly, and professionally. You may access the helpline by visiting [www.gd.ethicspoint.com](http://www.gd.ethicspoint.com) or by using one of the toll-free numbers on page 24.

As a result of a call to the helpline, a report is communicated to an authorized General Dynamics ethics officer. Reports are forwarded to the most suitable functional area within General Dynamics for investigation and resolution. Reports will be reviewed and appropriate action will be taken.

All data transfers will be handled in accordance with the appropriate data protection laws.



Subject to local law, you have the right to access your personal data held by the helpline.

The helpline website offers resources to help employees and managers navigate ethics issues. Under "Additional Resources" you can find links to the following.

- The *Blue Book*;
- Directory of General Dynamics Ethics Officers;
- The Manager's Tool Kit;
- Our Ethical Decision-making Model.

### **Investigating Suspected Violations of Our Standards**

If you believe someone associated with General Dynamics has violated our standards, you're expected to bring the matter in good faith to the attention of your supervisor or manager, your business unit's ethics officer, Legal Department, or the Corporate Ethics Office so we can conduct a prompt and thorough investigation. You can make reports by telephone, through e-mail, by making an appointment, or by contacting our Helpline.

Web reports are accepted online at [www.gd.ethicspoint.com](http://www.gd.ethicspoint.com) or by using one of the toll-free numbers on page 24. You may also contact the Audit Committee of the General Dynamics Board of Directors to report concerns about accounting or auditing matters by writing to:

Chair, Audit Committee, General Dynamics  
Board of Directors  
c/o Corporate Ethics Office,  
11011 Sunset Hills Road, Reston, VA 20190  
United States of America

In many circumstances, you have a personal responsibility to report activity that appears to violate laws, regulations, policies, or this *Blue Book*.

### **Prohibition against Retaliation**

General Dynamics will not retaliate against any person who brings to our attention in good faith an ethics or compliance issue. Individuals who raise concerns or who help us resolve reported matters are protected against retaliation. Anyone who uses the ethics and compliance program to spread falsehoods, threaten others, or damage another person's reputation will be subject to disciplinary action.

Discouraging other employees from making a report or getting the help they need is prohibited and could result in disciplinary action.

### **Disciplinary Action**

Violations of laws, regulations, principles, this *Blue Book*, or our policies can have severe consequences for you and for General Dynamics. Some violations may be criminal in nature and punishable by a fine and/or imprisonment. Violations can jeopardise our relationships with our customers and suppliers, and could result in loss of the privilege to do business in the countries where we operate. Employees who violate the laws, regulations, this *Blue Book*, or our policies are subject to disciplinary action, in accordance with applicable laws, which may involve any of a variety of measures as appropriate, up to and including dismissal. All disciplinary action is decided on a case-by-case basis.



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# The General Dynamics Ethics Helpline

Call toll free 24 hours a day, 7 days a week

COUNTRY	TELEPHONE
Australia	1800518093
Austria	0800 017867
Canada	1-800-433-8442 1-855-350-9393
France	0-800-99-13-17
Germany	0800-1821157
Hong Kong	800930294
Italy	800909705
Kuwait	503-619-1815
Mexico	800-681-6728
Qatar	00800100326
Saudi Arabia	800-850-0454
Singapore	8008523887
South Korea	00798-14-203-0274
Spain	900876281
Switzerland	0800-000-617
United Arab Emirates	800-0320514
United Kingdom	0800-048-5503
United States	1-800-433-8442

Toll-free numbers are available from every country in which GD has employees. Go to [www.gd.ethicspoint.com](http://www.gd.ethicspoint.com) for a complete phone listing. Collect calls can also be made to 503-619-1815.



RULES WE LIVE BY, IN ALL THINGS AND AT ALL TIMES

**Transparency**

**Honesty**



**Trust**

**Alignment**