



**GENERAL DYNAMICS**

Standards of Business Ethics  
and Conduct

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## Message

Dear Fellow Employee:

This is the General Dynamics *Standards of Business Ethics and Conduct* handbook, which we call the *Blue Book*. The *Blue Book* lays the foundation for how we conduct ourselves as a corporation and as individuals representing the company. Every action we undertake reflects on us, our values and our character.

At our core, we are in business to earn a fair return for our shareholders. In doing so, we must use our company's assets wisely and we must deliver on our promises to our customers, our partners and our people. These are the ethics that guide our conduct and decisions.

Please read the *Blue Book* carefully and spend some time thinking about our commitment to do the right thing every day. General Dynamics has an excellent reputation for how we do business. It is our responsibility as employees of General Dynamics to preserve that reputation through our integrity, honesty and respect for others.

Sincerely,

A handwritten signature in cursive script, reading "Phebe N. Novakovic".

Phebe N. Novakovic

Chairman and Chief Executive Officer



# Business Ethics Principles

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*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, 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 are people of our word — we deliver on our promises.
  - We are responsible to our stakeholders and earn their trust everyday.
- **Earn a Fair Return**
  - Our reputation is based on our ability to use our values to generate profits.
  - As we deliver on our promises, we must contract for a fair return.

**OUR BUSINESS CONDUCT REFLECTS OUR BUSINESS ETHICS PRINCIPLES**

# General Dynamics Business Ethics Model



# 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.

Over the years, this booklet has become known as the *Blue Book* after the color of its cover. Use the *Blue Book* in conjunction with the policies, procedures, and work rules of your business unit to guide your actions as you do your job. The *Blue Book* is not an employment agreement.

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 partners to develop ethics and compliance programs that are consistent with our values in all material respects. Only the Board or an authorized 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 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 strive to be:

- Law abiding
- Honest and trustworthy
- Responsible and reliable
- Fair and cooperative

When we talk about compliance, we refer to the laws, rules, regulations, and policies that control and direct both our actions and those of our company. The *Blue Book* includes information about both 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 recognize 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* will not give you 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. Maybe we did not have the information we 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 confidence. If not, you have several places where you may turn for advice and guidance:

- 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 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.

## Making Tough Decisions

The information in the *Blue Book* will help you work through most difficult business issues and dilemmas. But the answers to some problems are not obvious. 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?
- 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.

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



# Conducting Our Business

*Regardless of who the customer is, certain rules govern how we conduct our business every day.*

## Antitrust, Sales Practices, and Competitive Information

Antitrust and competition laws prohibit agreements that eliminate or discourage competition. Violations of these laws carry both stiff monetary fines and jail 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 practices. We will not engage in practices that 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 conspire to gain or use their proprietary information improperly.

Regarding antitrust laws and competitive practices, 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 organizations 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 that is a competitor could create real or potential conflicts of interest for you and our company. Be careful that your personal business relationships do not influence the decisions you make on behalf of General Dynamics.

### **Organizational 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 if 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 that are freely available to others. Never spy or steal in order to obtain competitive information. Seek advice if you think someone is giving you confidential information that you should not have. Unless disclosure is authorized, 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 favors were granted in order to influence business judgment. 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 practice does not conflict with our standards or the standards of the recipient's organization. You should not give or offer any gift if, under the circumstances, 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, or policies
- Avoid giving or receiving gifts above modest value when dealing with commercial customers
- Ensure that 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, or 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, and techniques such as selling short. The best way to know if information is public is to see it in the newspaper or on television.

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 practices, so that 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 restrictions regarding the import and export of our products, information, and technical data, including the U.S. International Traffic in Arms Regulations (“ITAR”). Nearly every country has laws and regulations that control the international movement (e.g., imports, exports, re-exports, and technology

transfers) of certain products, technical data, and services. These laws and regulations may also restrict the transfer of controlled technical data to certain people, whether inside or outside your country. Some countries have laws and regulations that prohibit dealings with “sanctioned” or “embargoed” countries, governments, companies, and individuals. 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 that apply to your work
- Know and follow the laws regarding export and import of our products, technical data and services, including those restricting releases of technical data
- Be careful when using consulting services to represent our interests. Consultants, sales representatives, distributors, and contractors must comply with General Dynamics’ standards of conduct

## Lobbying and Political Contributions

Do not contribute any company funds or other assets directly or indirectly to any political party or to the campaign for or against any candidate for political office, if prohibited by law. Seek legal advice before contributing anything to a charity that is affiliated with a politician. 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 organization.

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 that 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 follow carefully 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. This 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 to carry out these tests
- Record test results accurately

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

We select our suppliers based on objective criteria such as price, quality, and prior performance.

As a condition of employment, all consultants and part-time or temporary workers are required to follow the *Blue Book* as well as corporate and business unit policies and practices. 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
- Do not accept gifts of more than modest value
- Ensure that meals provided by a supplier or consultant serve a valid business purpose and are appropriate to the relationship

# Working With Government Customers and Public Officials

*We are a leader in the defense industry. We provide services and products to many governments around the globe. The laws and regulations relating to doing business with government customers and public officials are complex. Follow these laws carefully to protect our company's reputation. When working with government customers and public officials you must be vigilant in complying fully with all laws and regulations.*

## Bribes and Kickbacks

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

## 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
- Bill appropriate projects
- Do not split invoices to hide costs or avoid payment procedures
- Ensure bills 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 do not try to influence a customer's decision to purchase from General Dynamics by offering gifts, meals, or entertainment. 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. 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 recorded properly in our books and records.

## **Hiring Former Government Employees**

In some of the countries where we do business, the law restricts the hiring 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 former government employees.

## **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, or 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 ethics officer or the Legal Department regarding mandatory disclosure requirements.

## **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 are careful not to share any of our own proprietary information with government officials who are not on the government's list of approved persons. We do not 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 do not have proper clearance and the need to know.

It is your responsibility to follow all company and government procedures for handling classified 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 labor personnel found to be mischarging is subject to disciplinary action up to and including termination of employment. If you knowingly make false time charges, you may be accused of a crime.

## Working With Others

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

### Community Relationships

General Dynamics actively supports the communities in which we do business. Our civic activities demonstrate good corporate citizenship. We encourage you to participate in volunteer opportunities and community events on your own time or during work periods with management approval.

### 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 practices in all aspects of employment, including: recruiting, hiring, evaluation, training, discipline, work and service assignments, career development, compensation, promotion, and termination. We do not tolerate unlawful discrimination of any kind.

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

- Treat your fellow employees equally, regardless of race, color, religion, sex, pregnancy, national origin, disability, age, veteran status, sexual orientation, gender identity, or other protected status
- Understand and abide by all corporate and business unit policies, procedures, and work rules relating to employment and workplace fairness

### Drug-Free Work Environment

We strive to maintain a workplace that is free from the effects of drug abuse. We do not 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. Illegal drug use or abuse of controlled substances threatens our ability to serve our customers. It compromises the safety of our people, products, and services.

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



## Harassment

Harassment is behavior that disrupts another employee in his or her work because of the person's race, color, religion, sex, pregnancy, national origin, disability, age, veteran status, sexual orientation, gender identity, or other protected 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 an atmosphere 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 judgment in professional and personal relationships with co-workers

Sexual harassment can occur under many different circumstances. In general, sexual harassment occurs when:

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

## Safety and Health

We follow the laws and regulations of the jurisdictions where we work regarding workplace safety and health. We prohibit the possession of any licensed or unlicensed firearm or weapon on company property without authorization from the security office.

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

- Report all safety hazards and accidents
- 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

## Workplace Violence

We do not tolerate violent behavior at any workplace, whether committed by or against our employees. The following behaviors 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 judgment and promptly inform your supervisor, manager, Human Resources, or Security if you observe behavior that could be dangerous or violent.



# Protecting Our Resources

*We are entrusted with company resources and assets to perform our work. We are responsible for safeguarding company funds, information, records, tools, and property.*

## Company Resources and Intellectual Property

The assets, property, and resources of General Dynamics should be used primarily for business purposes. Company resources include but are not limited to: telephones, electronic mail, Internet access, voice mail, faxes, computers, equipment, machinery, and vehicles. Subject to local requirements, we permit reasonable use of telephone and e-mail for appropriate personal communication.

Managers may authorize personal use of company resources where such use does not 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 that you discover using 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.

## Confidentiality

Employee information and data are confidential and are used only for valid business purposes. This includes personnel file information, medical records, and home addresses.

You may have access to customer, company confidential, or proprietary information that must be protected from disclosure. The duty to keep information in confidence continues even after you leave our company. Always follow the law when handling personal data of other people. Contact your Legal Department for help and advice.

## 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

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, including recycling and waste disposal requirements.

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 only 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 unauthorized access by outsiders.

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 data
- Do not use software for which we do not have a license

- Do not share computer passwords
- Do not copy or distribute software for business or home use unless specifically authorized by the software license

## Internet Use

Supervisors and managers may permit Internet use during non-working periods. 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 information that 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 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.

## 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.

## Taking Action

*We are all responsible for acting ethically. We must accept and fulfill our duties to each other.*

### Our Ethics Program

At General Dynamics, 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. These three pillars — management, 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 handle ethical concerns. Get guidance from your business unit's ethics officer or Legal Department to learn the rules that 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 we talk openly about business conduct and our standards, the clearer we will be about what is expected. Managers and supervisors should:

- Lead by example
- Affirm the need to follow the laws, regulations, and policies that govern 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
- 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

## Employees

As an employee, you are expected to:

- Read, understand, and use the *Blue Book*
- 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 matter

When you are uncertain about the right course of conduct, 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 make the following tools and resources available:

- Policies and procedures
- Training and education
- Confidential resources where you can ask questions, get advice, and make reports

- The General Dynamics Business Ethics Helpline, available via telephone or on the web at [www.gd.ethicspoint.com](http://www.gd.ethicspoint.com)
- 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 in confidence — 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 governmental office or agency as appropriate. Not only will we deal with a specific situation, but we will also make changes so that similar problems do not recur.

## 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 Helpline are confidential and will not 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 Helpline Works

Although 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 is not intended to replace conversations between employees and managers, but rather to provide an additional resource to employees.

You can call our Business Ethics Helpline at any time to express a concern or report a possible violation of law in the areas of finance, accounting, banking, bribery or corruption. If you have questions about other business conduct issues, contact your manager, your human resources representative, or your business unit's ethics officer.

Reports to the Helpline may be made confidentially or anonymously, though we do not encourage anonymous reports. Whenever possible, identify yourself when contacting the Helpline. Your identity will not be revealed unless your own vital interest is at stake.

When reporting a concern, you may be asked to provide the time, location, names of the people involved, and other details so that we can investigate your concerns. Every call is handled promptly, discreetly and professionally. As a result of a call to the Helpline, a report is communicated to the ethics officer at General Dynamics who is authorized to receive it. All data transfers will be handled in accordance with the appropriate data protection law. We will investigate reports received through the Helpline, and take appropriate action to resolve each reported matter. Subject to local law requirements, you have the right to access your personal data held by the Helpline.

If you are the subject of a Helpline report, an appropriate person at General Dynamics will contact you as soon as possible after relevant evidence is secured. You will be informed of the following:

- The substance of the allegation against you
- The individuals who may receive information or reports relating to the allegation
- Information on how you can exercise your rights to access data and information about you

In some jurisdictions, use of the Helpline is optional. There will be no negative consequences if you choose not to use the Helpline.

The Ethics Helpline website is also a resource to help employees and managers resolve ethics issues. Under "Additional Resources" you can find links to:

- The *Blue Book*
- A directory of General Dynamics Ethics Officers
- The Manager's Toolkit
- Our Ethical Decision-Making Model

### Call Toll Free 24 hours a day, 7 days a week

Country	Phone Number
Austria	0800-291870
France	0800-902500
Germany	0800-1016582
India	000-800-100-1071
Italy	800-786907
Mexico	001-8008407907
Republic of Korea	0030-811-0480
Spain	900-991498
Switzerland	0800-562907
United Kingdom	0800-032-8483
United States and Canada	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.

## Investigating Suspected Violations of Our Standards

If you believe that someone associated with General Dynamics has violated our standards, you are 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 that 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 at [www.gd.ethicspoint.com](http://www.gd.ethicspoint.com). 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: Audit Committee, General Dynamics, P.O. Box 2161, Merrifield, Virginia, 22116-2161, U.S.A.

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 fine or imprisonment. Violations can jeopardize 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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