

JOHN DEERE

Code of Business Conduct

How We Run

Message from John C. May

John Deere Team,

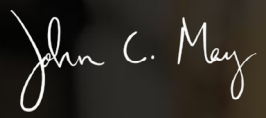
A company is only as healthy as its reputation and only as good as its word. Ultimately, a company is judged by its actions. At John Deere, we rely on our core values, a set of shared beliefs, to guide our behaviors. These values show that how we do business and treat others matters.

The Code of Business Conduct is foundational to how we interact with the world around us and to all we do as an enterprise. It provides specific guidance that applies to each of us, regardless of region, department, or facility. The Code also reflects our company's higher purpose of building a better way of life for people everywhere.

I urge you to read this document carefully and take its messages seriously. Consider how your actions and decisions affect others. Also be aware that while the Code provides guidance, it can't address every situation that might arise. So, reach out and ask for assistance if you are unsure about a decision or action to take.

If you know of any activity that appears to violate the Code or seems inconsistent with its spirit, please raise these issues using the tools or channels described in the document. Be aware, too, that the company does not tolerate retaliation against anyone expressing such concerns.

John Deere's name attracts esteem and trust around the world. Thoroughly understanding and adhering to this Code helps ensure this continues to be the case in the future. After all, it's how we run.



John C. May

Chairman of the Board of Directors
and Chief Executive Officer

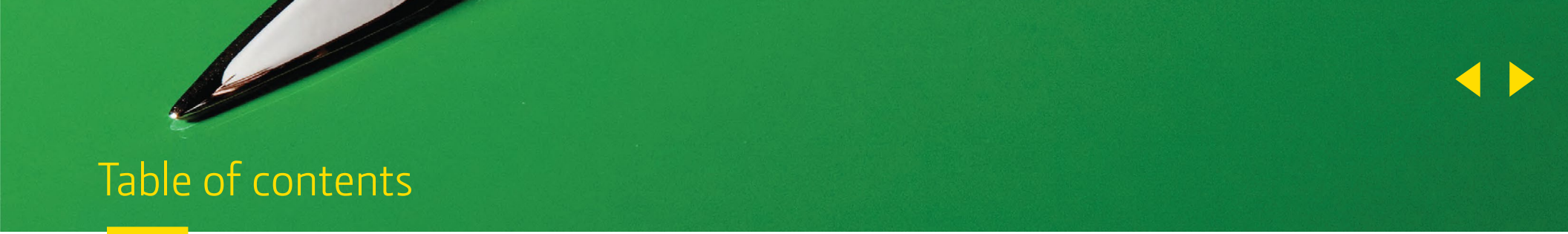


Table of contents

CEO message

Table of contents 3

How we run: Our values & our Higher Purpose 4
- Our values 5
- Our purpose 7

How we run: Living our values 8
- Our responsibility for values-based business conduct 9
- Responsibilities of all employees 9
- Crucial responsibilities of leaders 9
- Responsibilities of third parties 9
- How to use the Code 10
- Who must follow the Code 11
- Making ethical decisions 11
- Asking questions, raising concerns 12
- Zero tolerance for retaliation 12

How we run: Within our company 13
- We provide a safe, secure, and healthy workplace 14
- We foster a respectful environment 16
- We value every perspective 19
- We respect human rights 20
- We protect our reputation 21

How we run: With others 23
- We require ethical behavior from our suppliers and distribution channels 24
- We deal fairly and honestly 26
- We comply with international trade laws 28
- We comply with anti-bribery and corruption laws 29
- We work ethically with government officials 31
- We only give or accept appropriate gifts 33
- We respect people's privacy 35

How we run: Our company 36
- We avoid conflicts of interest 37
- We prevent insider trading 39
- We protect confidential information and intellectual property 41
- We use company property responsibly 43
- We protect the company from cybersecurity threats 44
- We create, maintain, and manage accurate records 47
- We value product safety and high quality standards 48

How we run: Our communities 49
- We protect the environment 50
- We responsibly participate in the political process 51

How we run: Conclusion & resources 52
- Final statement 53
- Consequences of non-compliance 53
- Policies, resources, and contacts 54-55

How we run: Our values & our Higher Purpose 4

Our values.....5

Our purpose.....7

How we run:
Our values & our Higher Purpose

Our world and business may change, but our core values are a constant in everything we do. Our values—Integrity, Quality, Humanity, Commitment, and Innovation—have shaped and guided our vision since 1837. They will lead us into the future and help us fulfill our purpose as a Smart Industrial company. We have been and will continue to be faithful to these values.

Our values

From how we operate our business to how we treat others, our core values guide everything we do. These values define us. They help us achieve our higher purpose. They differentiate us from our competition. They bring us together as a cohesive, global team.

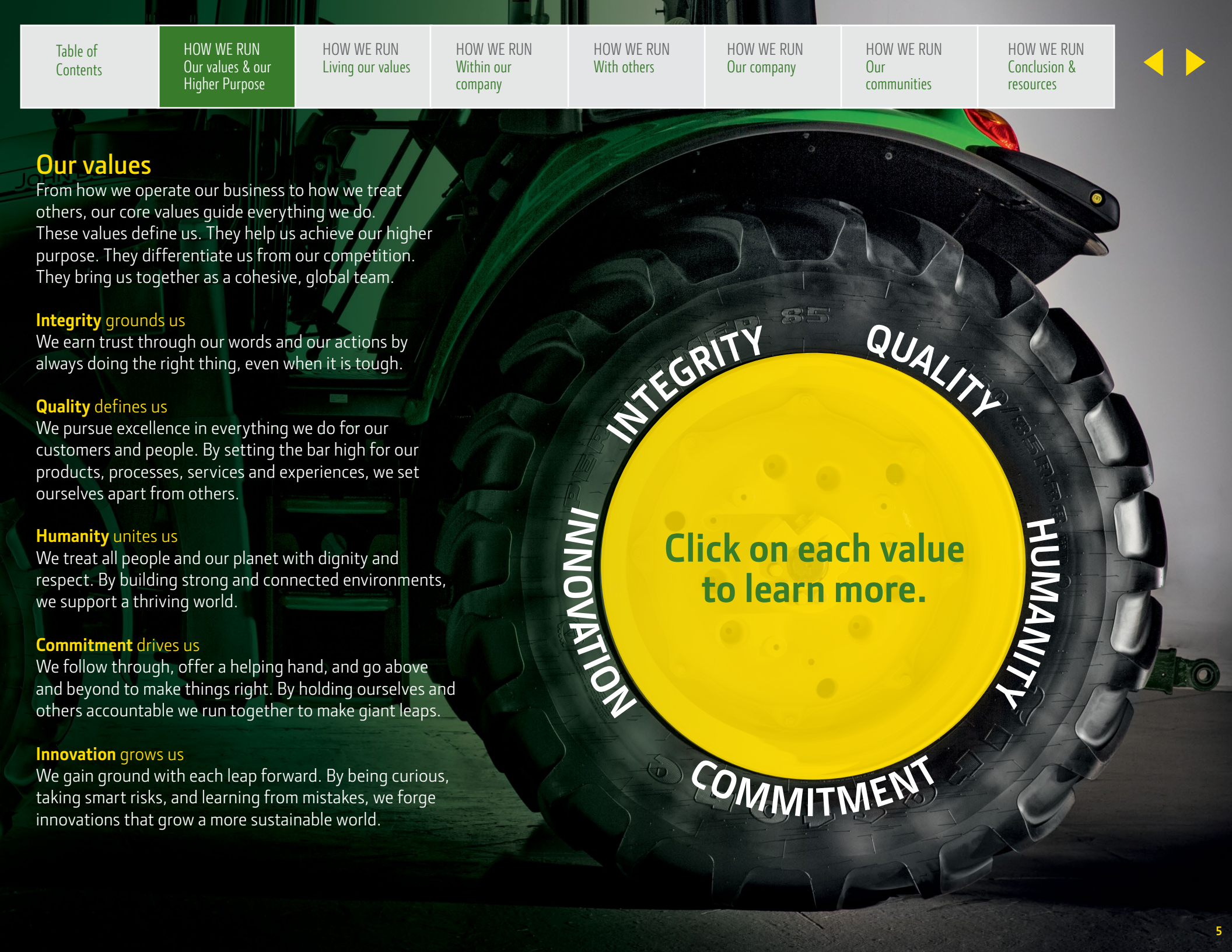
Integrity grounds us
We earn trust through our words and our actions by always doing the right thing, even when it is tough.

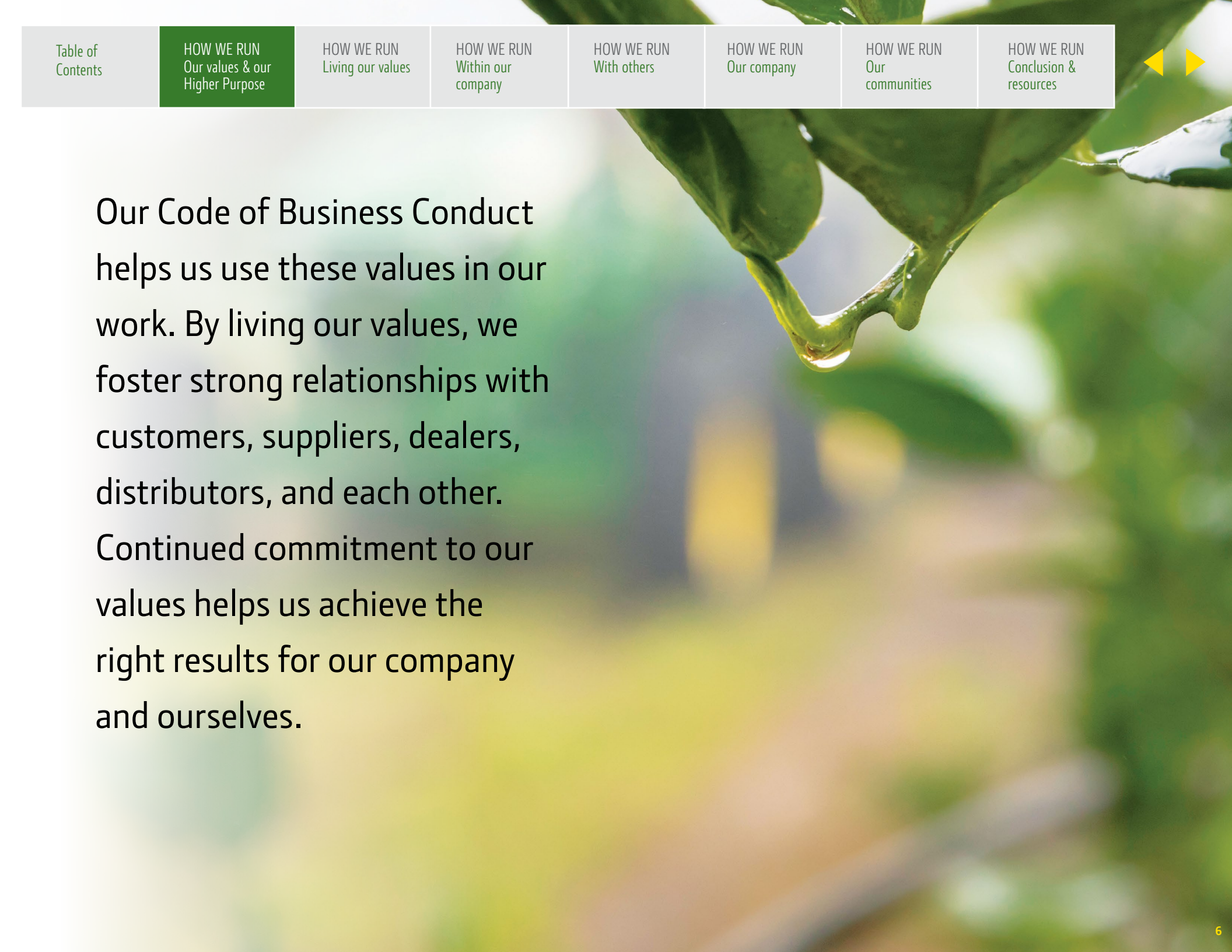
Quality defines us
We pursue excellence in everything we do for our customers and people. By setting the bar high for our products, processes, services and experiences, we set ourselves apart from others.

Humanity unites us
We treat all people and our planet with dignity and respect. By building strong and connected environments, we support a thriving world.

Commitment drives us
We follow through, offer a helping hand, and go above and beyond to make things right. By holding ourselves and others accountable we run together to make giant leaps.

Innovation grows us
We gain ground with each leap forward. By being curious, taking smart risks, and learning from mistakes, we forge innovations that grow a more sustainable world.





Our Code of Business Conduct helps us use these values in our work. By living our values, we foster strong relationships with customers, suppliers, dealers, distributors, and each other. Continued commitment to our values helps us achieve the right results for our company and ourselves.

Our Higher Purpose

We Run So Life Can Leap Forward.

This simple yet powerful purpose is our resolute promise to humankind. It is a pledge to everyone, everywhere, that John Deere will continue to dream, design, and deliver breakthrough products to advance life and sustain our world for generations to come.

We are uniquely positioned to meet the rapidly increasing global demand for food, housing, and infrastructure. By leveraging our distinct advantages in manufacturing, engineering, and technology, we are accelerating human progress and becoming better stewards of our planet.

Our Higher Purpose and core values of Integrity, Quality, Humanity, Commitment, and Innovation are constant reminders of why our work is so vital for those who rely upon our machines, services, and expertise to build a better future for all.





How we run: Living our values 8
Our responsibility for values-based business conduct 9
Responsibilities of all employees 9
Crucial responsibilities of leaders 9
Responsibilities of third parties 9
How to use the Code 10
Who must follow the Code 11
Making ethical decisions 11
Asking questions, raising concerns 12
Zero tolerance for retaliation 12

How we run: Living our values

We make a commitment to our stakeholders: that we will do business with integrity. We measure our accomplishments by how we achieve them as well as by the results themselves. Our Code expresses the values that shape our everyday interactions. It leads how we operate our business. The Code helps us run with Integrity, Quality, Humanity, Commitment, and Innovation in everything we do.

Sometimes, we need guidance in order to live our values. We can find that guidance in our Code. In this section, we will discuss how our Code applies to and affects all of us.

Our responsibility for values-based business conduct

Sustaining our reputation for integrity is everyone's job. We need to protect the company from unethical, improper, or illegal actions. This is true wherever those actions take place. As a United States-based company with global operations, we follow laws in the places where we do business. There may be situations where we must follow U.S. laws even outside the United States. Laws include legally binding regulations, directives, and codes. Where laws may conflict with each other or our Code, we are expected to contact the legal department so they may properly address the conflict.

Responsibilities of all employees

We're all responsible for living our core values and complying with our Code. This involves committing to do the following:

- Be professional, honest, and ethical in everything we do on behalf of the company
- Understand and abide by the laws applicable to your work
- Read and certify our commitment to the Code and company policies
- Complete required compliance training on time
- Seek guidance if unsure about a situation or decision
- Report concerns about possible violations of laws, regulations, the Code, or company policies
- Support company investigations and maintain confidentiality when involved in an investigation
- Not retaliate against anyone who reports a concern or participates in an investigation

Crucial responsibilities of leaders

Leaders at all levels of the organization must go beyond the important responsibilities mentioned. Whether they are a manager, a supervisor, or a knowledge leader, every leader must build a culture of trust and integrity. They must:

- Lead by example
- Be role models for ethical behavior
- Advocate for ethics and integrity with employees
- Set clear expectations that *how* work is done is as important as the work itself
- Ensure employees complete compliance training and understand the Code and company policies
- Encourage employees to share questions or concerns, and listen and respond appropriately
- Never retaliate, or allow retaliation, against anyone who raises concerns or supports an investigation

These responsibilities are listed in the Code so all employees will know the company's expectations for leaders.

Responsibilities of third parties

We do business with many third parties. These parties include our suppliers and distribution channels. While they're typically independent businesses, these parties' actions in relation to our company can impact our business and reputation. We expect them to do business in keeping with our values. Each of these parties must comply with all relevant laws and business regulations. Our suppliers must follow our **Supplier Code of Conduct** and company policies relevant to labor and human rights, health and safety, environmental sustainability, and ethics.

How to use the Code of Business Conduct

The **Table of Contents** is the best place to start when navigating the Code of Business Conduct. The Table of Contents lists each of the seven sections that make up the Code. The first two sections provide an overview of our values and how we approach compliance.

The next four sections look at major areas of compliance policy.
These are:

- Working with colleagues
- Working with our suppliers and distribution channels
- Protecting the company
- Helping our communities

Within these categories there are clear instructions on how each one of us is expected to act responsibly.

The Code ends with a conclusion and compilation of resources. **Policies, Resources, and Contacts** is a great place to check when we have questions about complying with the Code or company policies.

Additional help

Q: What if we face a situation that isn't covered by this Code of Business Conduct?

A: Our Code can't address every issue we may face at work.
If we're ever unsure about how to proceed, we should check our policies. If the answer still isn't clear, we should ask for help.
We can start with a manager or any of the resources listed in the Code.



Who must follow the Code

The guidance in our Code and company policies applies to each of us—all company employees. This includes our subsidiaries and controlled affiliates.

Making ethical decisions

We rely on one another to do the right thing. This includes making ethical decisions aligned with our core values. When faced with a difficult decision about business conduct, several resources offer guidance. We can consult this Code or company policies. We can also reach out to managers, Human Resources, the compliance or legal department, or our Compliance Ambassadors, who are typically the accounting managers or unit controllers.

Making ethical decisions: A framework

Use the following questions as guidance when trying to make a difficult decision about business conduct.

Is it consistent with our core values?

- Yes, it is.
- No, it isn't.

Am I following the strictest rule that applies to this situation? (We must always follow applicable law, but sometimes this Code or company policy are stricter.)

- Yes, I am.
- No, I am not.

Would this build or harm trust with other employees and our customers, shareholders, or communities?

- This decision would likely build trust.
- This decision might harm trust.

Would I feel comfortable if my actions became public?

- Yes, I would.
- No, I would not.

Would my decision uphold the company's reputation of integrity?

- Yes, my decision will uphold the company's reputation.
- No, my decision might harm the company's reputation.

Asking questions, raising concerns

It's essential we report potential violations of our Code, policies, or the law. We also need to report any actions that challenge our integrity. If we aren't sure whether something violates policy, we should ask about it. If we know about an issue and don't report it, we may make it worse.

If we have concerns about actual or potential misconduct, we shouldn't attempt to investigate it ourselves. Instead, we should report it immediately to at least one of the following:

- A manager
- A Human Resources or Labor Relations contact
- A member of the legal department
- The John Deere Compliance Hotline

The **John Deere Compliance Hotline** provides an avenue for confidential reporting. Anonymous reporting is available where allowed by law. The hotline is available 24 hours a day, seven days a week.

- Web: **https://johndeere.ethicspoint.com/**
- Telephone: **Find local country number**
- Mail: Compliance Hotline Committee, P.O. Box 1192, Moline, IL 61266-1192, USA

Information about reports or investigations is only shared with a limited number of people on a strict business need-to-know basis. When we participate in an investigation, we should always follow instructions we receive about protecting confidentiality.



Zero tolerance for retaliation

It takes courage to speak up when something's not right. It's understandable that we might be anxious or uncomfortable. We can be assured that the company does not tolerate retaliation of any kind against employees who report concerns of inappropriate conduct. Employees who support an investigation are also protected from retaliation. If we experience retaliation in any form, we should report it promptly.

For more details, see our Global Reporting Policy and our Global Policy Against Retaliation. Or review the Code's **Policies, Resources, and Contacts**.



How we run: Within our company 13

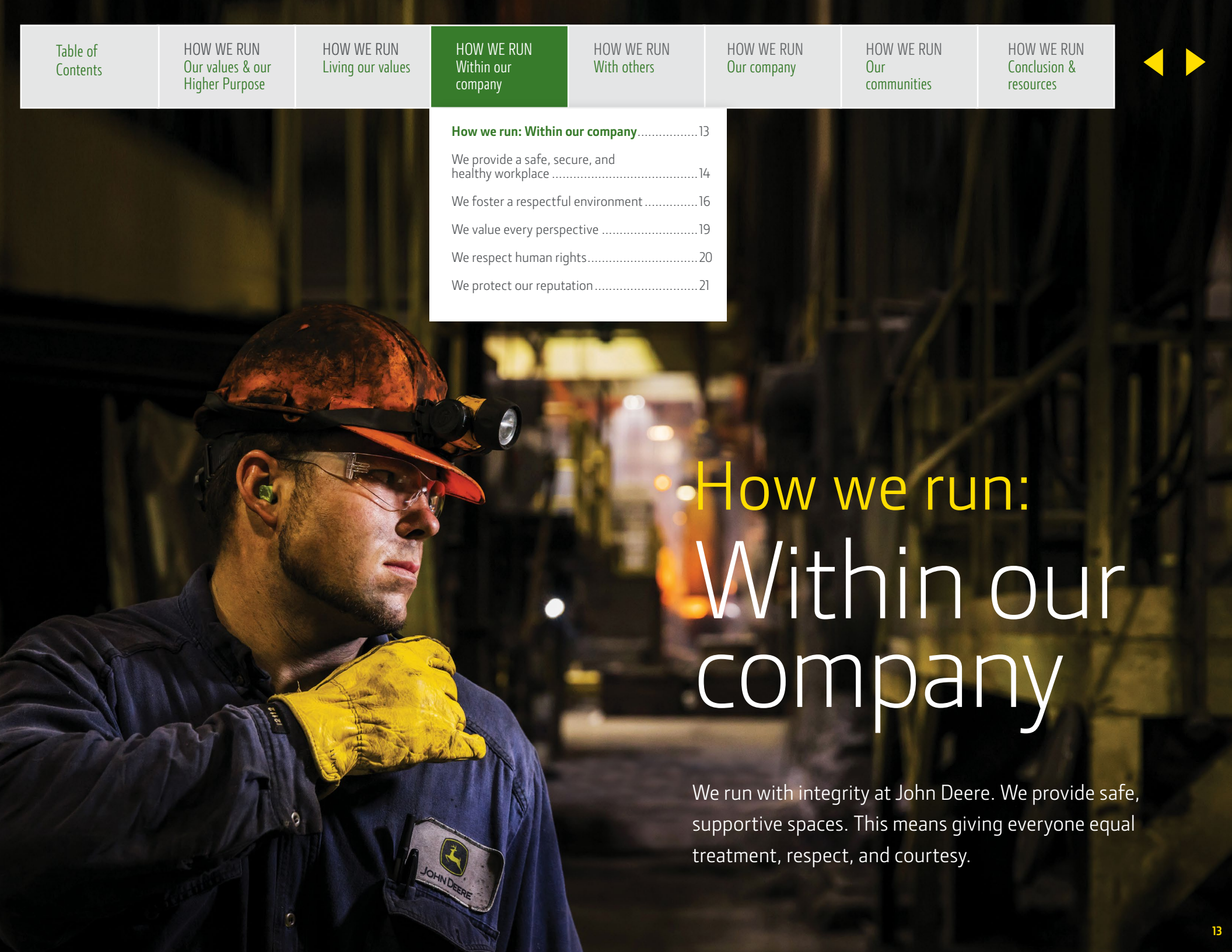
We provide a safe, secure, and healthy workplace 14

We foster a respectful environment 16

We value every perspective 19

We respect human rights 20

We protect our reputation 21



How we run: Within our company

We run with integrity at John Deere. We provide safe, supportive spaces. This means giving everyone equal treatment, respect, and courtesy.

We provide a safe, secure, and healthy workplace

Our responsibility

When we feel secure where we work, we can concentrate on working hard and with purpose.



Why we are responsible

Providing a safe, healthy workspace is one of our greatest priorities. We each contribute to—and need to protect—the overall environment in which we work. We are empowered to speak up if we see something or someone that poses a risk or danger to our employees. This includes threatening behavior, unsafe practices, or potential acts of violence.

Training to do our jobs safely, following health and safety protocols, and reporting related concerns as soon as possible all help us innovate and succeed.



How I act responsibly

I will fulfill my obligation to protect my colleagues and myself when at work in the following ways:

- I will abide by applicable safety policies and programs.
- I will complete safety training and use personal protective equipment (PPE) as required.
- I will follow the company's incident response plans in an emergency.
- I will not conduct work for the company while under the influence of alcohol or illegal drugs. I may drink alcohol in moderation at approved events, if I choose.
- I will not smoke on company property outside of authorized areas.
- I will not act violently or make any threats toward any individual connected with the company.
- I will not bring weapons inside company facilities.
- I will address any unsafe behavior with my coworkers and report any potential safety or health risks to my supervisor or manager.
- If I learn about or see an act of violence, I will make sure I am safe. Then I will immediately call emergency services and notify company security or Human Resources.
- I will use the company's approved processes and systems when scheduling and purchasing travel arrangements to ensure that the company is aware of my business travel plans.



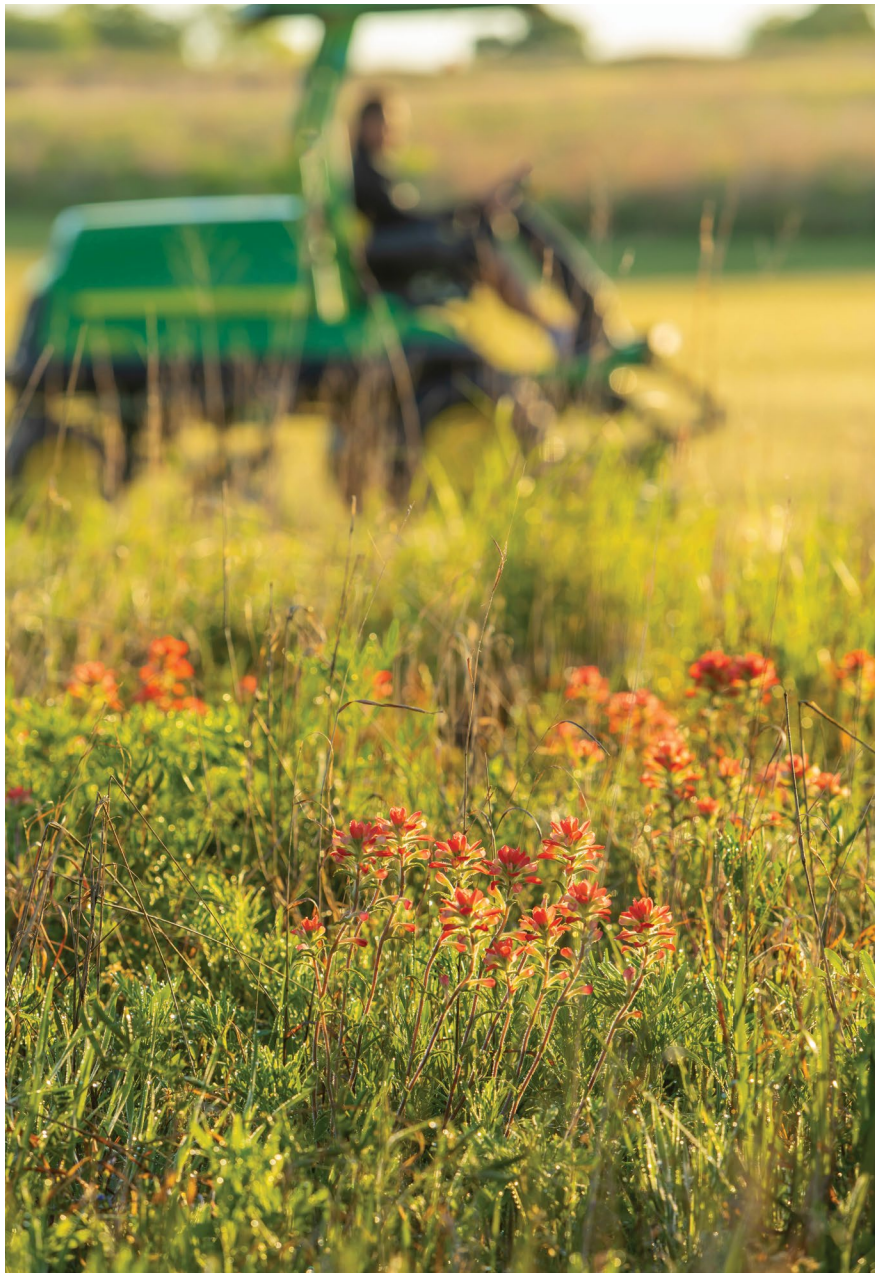
Q&A: Workplace violence

Q: I recently overheard an argument between two of my coworkers. At first, I didn't think much of it. As the argument became more heated, they started raising their voices. It became apparent there might be a fight. I wanted to step in, but I didn't know what to do. So, I ignored the situation. What should I have done differently?

A: Your reaction is understandable. However, your coworkers' behavior was unacceptable. Their heated words didn't just pose a risk to the two of them. They also endangered others around them. You should have ensured your safety, then called local company security or Human Resources. No matter how difficult or uncomfortable a situation may be, do not ignore it.

Our resources

Global Drug and Alcohol Policy
Global Environment, Health, and Safety Policy
Global Tobacco and Smoke-Free Workplace Policy
Global Travel Policy
Global Workplace Violence Prevention & Intervention Policy



We foster a respectful environment

Our responsibility

Our goal is to provide everyone with a positive, supportive workplace. We achieve this by removing fears about—and preventing—discrimination, harassment, and retaliation.



The importance of no retaliation

Q: My manager frequently makes negative comments about my disability. I've asked for this to stop multiple times, and it hasn't. I'd like to report these actions. I'm also about to apply for a promotion. I'm worried that if I make the report, I'll upset my manager, who will then deny the promotion. What should I do?

A: Report your manager's actions right away. Those actions violate company policy against harassment. You should always report potential policy violations. If your manager denied your promotion because you reported this behavior, your manager would be committing retaliation. The company does not tolerate any retaliation against those who report harassment. (The same applies for retaliation against reporting any other policy violation.) Trust the company to investigate all policy violations and protect you from retaliation.

Why we are responsible

None of us should worry about disrespectful treatment or retaliation anywhere we conduct business. In order to feel safe at each of our workplaces, we need to remove any concerns about improper conduct. This means discrimination, harassment, or retaliation of any kind is unacceptable.

Instead, we prioritize keeping our workplaces safe, positive, and respectful. This helps all of us focus on what matters—our work.

Q&A: Discrimination

Q: Last week, I overheard three of my employees talking. They said they didn't want a fourth employee to join our team because he's gay. I told them we don't accept such behavior here and it violates our Code. Should I have done anything else?

A: You did the right thing. But you should also report the behavior right away. An investigation helps us know if there is a broader issue and whether more action is needed. Think about your team's dynamics. Is the team inclusive of all employees? Do they need to be reminded of the Code or our policies? Do they understand how their comments went against our values? Strive to establish a tone of mutual respect.

How I act responsibly

Maintaining a respectful workplace requires everyone's participation. I will participate as follows:

- I will be courteous and respectful to all individuals within the company.
- I will treat others fairly.
- I will avoid making comments or taking actions that might seem hateful or hurtful.
- I will speak up when I see or hear others behaving improperly.
- I will not discriminate against anyone based on any classification stated in company policy or protected by law.
    - This means I will not discriminate based on a person's or group's race, color, religion, age, sex (including pregnancy, childbirth, breastfeeding, or related medical conditions), sexual orientation, gender, gender identity or expression, marital or partnership status, family status, citizenship, genetic information, national origin, ancestry, geographic background, military or veteran status, or disability (mental or physical).
- I will not harass anyone in the company verbally, visually, or physically.
    - This means I will avoid offensive jokes, inappropriate conduct, and threats.
- I will avoid retaliating against anyone in the company.
- I will promptly report any instances of discrimination, harassment, or retaliation according to the Global Policy Against Discrimination & Harassment.



Q&A: Impacting the workplace

Q: I'm connected with my entire work team on social media. Lately, my manager has been posting offensive content. It's sexist. I'm uncomfortable, and I think my teammates are too. At work, all I can think about is what my manager posted online. What can I do?

A: Your manager's behavior outside of work is impacting your team. The manager's conduct probably violates our Code and policies, no matter where it happened. That's because it affects you and others at work. In a situation like this, we rely on you to report what's going on. Then the company can investigate the situation and address it.

Q&A: After-work conduct

Q: I went on a business trip with my manager and a few colleagues. At dinner, they were loud and obnoxious. They also made racist comments. Their behavior offended me. I'm starting to dread having to work with them. What can I do?

A: If you were comfortable, you could have said something to them at the time. Then, they may have stopped the inappropriate behavior. Whether you do or don't feel comfortable saying something, let the company know by reporting. We should always use respectful, professional behavior while representing the company. This includes while traveling for business. Your colleagues' actions reflected poorly on the company, and they made you uncomfortable. The company will not tolerate any retaliation against you for making a report.



Our resources

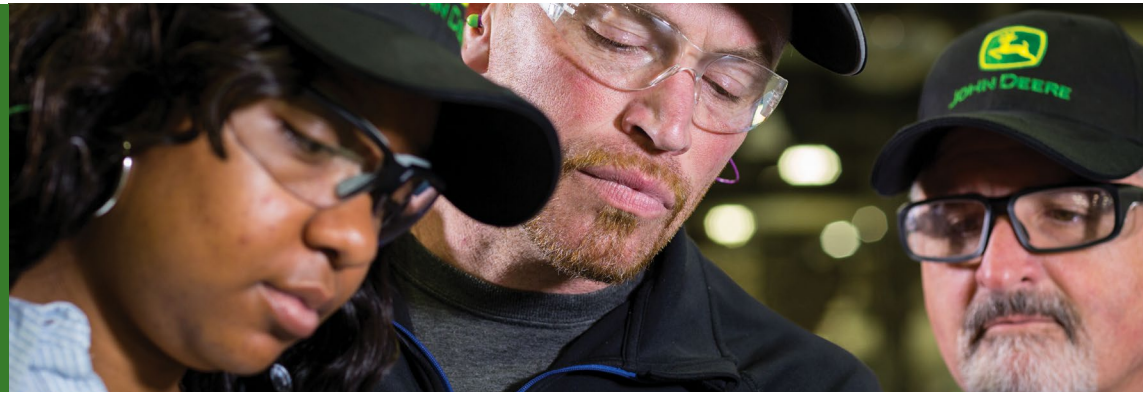
Global Policy Against Discrimination & Harassment

Global Workplace Violence Prevention & Intervention Policy

We value every perspective

Our responsibility

Rooted in the truth that progress and growth require a fair playing field, we foster an environment where every employee's viewpoint is considered, valued, and respected. We champion policies, practices, and behaviors that amplify innovation on behalf of people, community, and planet. Our unique backgrounds and talents fuel innovation and enable us to create groundbreaking, high-quality products and solutions for our customers.



Why we are responsible

Building the industry's top products requires the best talent. By prioritizing respect and fairness in our processes, we attract, engage, and retain top talent from all backgrounds. Our goal is to create an empowering environment where every perspective is valued, and every individual is inspired to contribute their best work. Together, we can achieve extraordinary outcomes and harness the full potential of our workforce to shape a brighter future for all.

Q&A: Welcoming new employees

Q: Mika just joined my work team. In welcoming Mika, I asked what I could do to facilitate her onboarding in our company. She told me she has low vision, and sometimes she will use her magnifying glass on the job. I've welcomed her as I would any other employee, but what else can I do to help Mika feel more included?

A: Asking new employees like Mika what you could do to facilitate their onboarding in our company shows you're already thinking about how to be welcoming and supportive. You can also ask her if we could provide other assistive technologies to guarantee her total accessibility. This way, she can get comfortable to ask you for any support she may need. Check in with Mika and ask about her early experiences at John Deere.

How I act responsibly

I will value every perspective by doing the following:

- I will acknowledge and respect the rights of other employees.
- I will treat all employees with courtesy, dignity, and respect.
- I will seek out varied points of view and advocate for each individual's opinion to be considered.
- I will treat all employees fairly, encourage advancement based on talent, contributions, and aspirations, and base any employment decisions on individual merit.
- I will behave in ways that promote fairness during work, at work functions on or off the work site, and at all events which the company sponsors or otherwise participates in.
- I will treat all applicants fairly when participating in the hiring process.
- I will report any disrespectful behavior to a manager, my Human Resources or Labor Relations contact, a member of the legal department, or the **John Deere Compliance Hotline**.

Our resources

Global Policy Against Discrimination & Harassment

We respect human rights

Our responsibility

At our company, we honor human rights. We admire people for who they are. We treat everyone with respect.



Why we are responsible

Preserving human rights is an essential part of adhering to our values. We do not tolerate human rights abuses, such as forced labor, unlawful child labor, or human trafficking. We are proud to contribute to the places where we work and support their residents. This ensures that we support others' rights and sustain our integrity.



How I act responsibly

I will support the company's efforts to honor human rights by doing the following:

- I will honor the rights of my colleagues, suppliers, customers, and our distribution channels. I will require them to do the same.
- I will require my colleagues, suppliers, and distribution channels to obey applicable labor laws, including child labor laws, and requirements related to conflict minerals.
- I will report concerns about or violations of human rights to the legal or compliance departments, or the **John Deere Compliance Hotline**.

Our resources

Dealer Code of Conduct
Global Conflict Minerals Policy
Supplier Code of Conduct
Support of Human Rights in Our Business Practices

We protect our reputation

Our responsibility

Our brand is our largest asset, and our name is highly respected. We need to preserve both through our actions and communications.



Why we are responsible

Communicating with care is how we protect our reputation. We must be honest and precise and communicate in a respectful manner. This is especially important when we identify ourselves as company employees on social media.

We must be careful about what we say and who says it. We must safeguard the company's confidential and non-public information in public communications. Official messages may only come from those who are approved to speak on behalf of the company.

Q&A: Endorsements

Q: One of the suppliers I work with asked me for a company endorsement. The supplier does great work, but I'm not sure I should be the one making this decision. What should I do?

A: Politely tell the supplier you're not authorized to give endorsements. You can refer this question to Global Brand Management. For more details, check our Global Supplier Communication Policy.

How I act responsibly

When communicating about the company (including through social media), I will do the following:

- I will ensure my communications align with our Code and core values.
- I will protect the company's non-public information.
- I will write precise and honest messages.
- I will not negotiate to allow supplier use of our company's trademarks in their advertising or promotion.
- I will remember that Global Brand Management manages endorsements. These must be approved by the vice president of supply management and the vice president of global brand and corporate communications.
- I will forward inquiries to the proper party if I do not have authorization to respond.
- I will refrain from using social media to do business on behalf of the company unless I am authorized.
- If and when I post about the company on social media:
    - I will clarify my relationship with the company.
    - I will separate my opinions from the company's opinions.
- I will report any communication concerns or policy violations to a manager, Public Relations, a member of the legal department, or the **John Deere Compliance Hotline**.



Q&A: External inquiries

Q: Someone from my local newspaper contacted me on a social networking site. The reporter wanted me to provide a quote about a new facility we're building. Is this okay for me to do?

A: Employees should not respond to news media or public inquiries unless their job is specifically authorized to do so. If you don't already have permission to speak for the company, check with **Public Relations**. If you don't get permission, politely decline. If you do get permission, you may make a tactful, appropriate statement approved by Public Relations. In some cases, media inquiries may be approved by divisional or regional public relations staff. Please see the Global External Communication Policy for more information.

Our resources

Global Email Creation and Retention Policy
Global External Communications Policy
Global Social Media Policy
Global Supplier Communication Policy



How we run: With others 23

We require ethical behavior from our suppliers and distribution channels..... 24

We deal fairly and honestly 26

We comply with international trade laws..... 28

We comply with anti-bribery and corruption laws..... 29

We work ethically with government officials 31

We only give or accept appropriate gifts 33

We respect people's privacy 33



How we run: With others

Following our values extends to how we act with customers, suppliers, competitors, and our distribution channels. We demonstrate our commitment to honesty and excellence whenever we represent our company or interact with others.

We require ethical behavior from our suppliers and distribution channels

Our responsibility

Our suppliers and distribution channels all have something in common. We expect them to conduct business ethically, with integrity and quality.



Why we are responsible

Our suppliers and distribution channels must adhere to all applicable laws and act ethically anywhere they do business. Because their behavior reflects on us and could impact our reputation, we maintain high standards for how they conduct business.

Suppliers and those who sell our products are required to demonstrate integrity and quality in their operations. It's especially important that they protect human rights, health and safety, and the environment. We expect them to behave legally and ethically.



How I act responsibly

I will uphold our high standards when I work with our suppliers and those who sell our products:

- I will act with integrity when interacting with our suppliers and distribution channels.
- I will treat our suppliers and distribution channels as independent businesses.
- I will follow our Global Gifts, Entertainment, & Meals Policy when working with those outside the company.
- I will expect suppliers to treat their relationships with us as confidential.
- I will expect suppliers to comply with our Supplier Code of Conduct.
- I will follow our Global Supplier Communication Policy.
- I will only propose business relationships for which I do not have a conflict of interest.
- I will avoid endorsing or publicly commenting about any supplier.
- I will protect and not share any private data or information belonging to our suppliers or distribution channels.
- I will report policy violations by any supplier or distribution channel to a manager, the legal department, or the **John Deere Compliance Hotline**.



Q&A: Choosing a new supplier

Q: One of our suppliers is discontinuing the products we purchase from them. These products are essential to the development of one of our technologies. We can't afford to have a gap in our supply. I want a replacement lined up before we get our last order. How should I choose a replacement supplier?

A: Unless the product being purchased from the original supplier is a design owned by our company, we can't share prints or design details of the part without the original supplier's consent. If we do not have consent, we must create specification drawings for the potential supplier to design or develop the part. We cannot provide any of the original supplier's intellectual property or design data.

Our resources

Dealer Code of Conduct

Global Conflicts of Interest Policy

Global Environment, Health, and Safety Policy

Global Gifts, Entertainment, & Meals Policy

Global Supplier Communication Policy

Supplier Code of Conduct



We deal fairly and honestly

Our responsibility

We strive to be a company with which others want to do business. Representing ourselves honestly is an important part of that. So is treating others—including competitors—with respect. We do not unfairly criticize the products or services of our competitors. In fact, we would much rather talk about the benefits of our own.



Why we are responsible

We make honest, factual claims when discussing our products, solutions, and services. We gather information about competitors or the market in an honest, legal manner. We do not use misleading or unfair comparative advertising or deceptive trade practices.

We commit to fair competition and abide by applicable competition laws. This protects us from the reputational, financial, and criminal consequences of violating these regulations.

This approach also places our solutions and services in a position to succeed due to their own merits. Customers appreciate our integrity as well as our high-quality, innovative solutions.

How I act responsibly

I will deal fairly with our competitors and customers by committing to the following:

- I will deal honestly with each individual with whom I do business.
- I will describe competitors and their products and services accurately and fairly.
- I will protect the company's confidential and competitively sensitive information.
- If I obtain another company's confidential information accidentally or without authorization, I will report it to the legal department.
- If I suspect or experience any anti-competitive behavior, I will report it to the legal department.



Q&A: Contact with a competitor

Q: I just met with a salesperson employed by a competitor. The salesperson asked me about pricing, future products, and dividing up sales opportunities. I politely said I couldn't discuss and then changed the subject to last night's sports match. Did I do the right thing?

A: Yes. If a competitor attempts to discuss these topics with you, immediately stop or walk away from the discussion. Do whatever you can to make it clear that you will not participate in a discussion on those topics or cooperate. Then, report the matter to the legal department immediately.



We comply with international trade laws

Our responsibility

Conducting business honestly is about more than being ethical. It's also about obeying applicable global regulations related to international trade.



Why we are responsible

We abide by applicable international trade-related laws and regulations wherever we do the following:

- Import or export our products or services
- Engage in transactions
- Have business operations

Because we do business in so many countries around the world, it's essential we follow all applicable global trade laws and regulations. Complying with these laws and regulations protects our brand. It also reduces our risk of penalty and enforcement action.

How I act responsibly

I will follow all international trade laws, including applicable U.S. regulations, when conducting company business. In particular:

- I will abide by regulations when exporting or importing goods, services, or technology.
- I will not do unauthorized business with countries subject to U.S. or other applicable embargoes regardless of the country where I work.
- I will verify that company transactions and activities are lawful under applicable sanctions and restricted or denied party laws.
- I will comply with applicable anti-boycott laws and regulations.
- I will observe the standards set forth in the Global Export Controls Policy.
- I will seek guidance from the legal and compliance departments to resolve any conflicts of law related to international trade.

Exports

Exports can include physical shipments, electronic transfers, downloads and emails across borders, and so-called "deemed exports" where a non-U.S. person accesses engineering technology while physically present in the United States.

Our resources

Global Export Controls Policy

We comply with anti-bribery and corruption laws

Our responsibility

We have a responsibility to do business ethically and in compliance with the law. This includes not engaging in bribery and other acts of corruption.

Why we are responsible

Bribery and corruption are unlawful and contradict our core values. Paying or accepting an improper payment, like a bribe, is unethical and dishonest. Getting business through such methods damages our reputation.

We're proud that we do business ethically and honestly. It's better to turn down a transaction or lose an account than to make an improper payment.

Note: The company wants us to be safe. If your health or safety is threatened in order to force you into making improper payments, you must exercise your best judgment to protect yourself. In such cases, you should report the situation to the Vice President and Chief Compliance Officer. If you are experiencing an immediate threat, contact local authorities.

Q&A: Interacting with government officials

Q: I am submitting a proposal to a government-owned business in a developing country. A public official suggested I pay a personal fee. This would ensure my proposal receives special consideration. The public official assured me this is a common practice. It doesn't feel right but I want my proposal to get the attention it deserves. Should I make the payment?

A: No, this is an improper payment. It is a violation of our Code and the law. Do not offer anything of value to anyone to improperly obtain a special preference. Report the request to the legal department right away.



How I act responsibly

In order to protect our company from corruption, I will commit to the following:

- I will comply with anti-corruption laws. Every country where we do business has anti-corruption laws. Examples of these laws include the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act, and the Brazil Clean Companies Act.
- I will not propose, give, or accept any improper payments or anything of value in order to gain or retain business. Such payments or things of value may include the following:
  - Money (bribes)
  - Gifts and favors
  - Travel and entertainment
  - Charitable donations
  - Job offers
  - Other means of gaining an improper competitive advantage
- I will not request, make, or accept any improper payments through a third party.
- I will maintain thorough and accurate books, records, and accounts.
- I will comply with our Global Anti-Bribery Policy.
- I will comply with our Global Gifts, Entertainment, & Meals Policy.
- I will report any payments or gifts that seem questionable or improper to a manager, a member of the legal department, or the **John Deere Compliance Hotline**.
- I will report any requests for improper payments to a member of the legal department.



Our resources

Global Anti-Bribery Policy

Global Gifts, Entertainment, & Meals Policy

Country and regional gift policies

We work ethically with government officials

Our responsibility

An essential part of doing business with integrity is obeying the law. Our commitment to ethical business practices is especially relevant when we work with government officials and government employees.



Why we are responsible

We interact with government officials and government employees in many capacities around the world. This includes interacting directly through our employees and indirectly through consultants and agents. It's important for our employees, consultants, and agents to behave ethically. It's also vital we know and comply with relevant laws.

When we work with the government, special laws apply, such as those relating to gifts, entertainment, and contributions. It's important to understand these rules and comply with them. If you aren't sure about the laws that apply, contact Public Affairs or the legal department.

Our resources

Global Anti-Bribery Policy

Global Gifts, Entertainment, & Meals Policy

Country and regional gift policies

How I act responsibly

When interacting with government officials, I will represent our company with integrity. For instance:

- I will abide by governing laws wherever I work.
- I will treat government officials fairly and honestly.
- I will comply with government requirements for competitive bidding, record keeping, recruiting, inspections, and product testing.
- I will comply with our Global Anti-Bribery Policy.
- I will comply with our Global Gifts, Entertainment, & Meals Policy.
- I will comply with country or regional gift policies wherever they apply.
- I will get the appropriate approval before exchanging anything of value with a government employee or official, as outlined in the above policies and procedures.
- I will get approval before making political contributions connected to the company, including through a non-Deere Political Action Committee (PAC).
- I will follow any requirements related to government business or funds.
- I will notify the legal department if I receive an information request from a regulator.
- If I suspect or experience any unethical or illegal interactions with government officials, I will report them to the legal or compliance departments, or the **John Deere Compliance Hotline**.



We limit the giving or receiving of gifts

Our responsibility

We make business decisions based on quality and merit. Occasionally, we may exchange small gifts or other courtesies as part of business relationships. We exchange them responsibly and transparently, avoiding any potential conflicts of interest.



Why we are responsible

We are committed to doing business ethically, transparently, and lawfully. We make sure that this commitment extends to giving and receiving business courtesies.

This means we exchange gifts and entertainment rarely and responsibly. We should not aim to influence or receive anything in return. All business courtesies we exchange must be unsolicited.

Following our policies helps us gain business based on the quality of the products, solutions, and technology we offer. We are careful in giving and receiving gifts so we can make the best decisions for our company. When giving any gift, consider all the policies that apply and follow the most restrictive applicable rule.

How I act responsibly

Exchanging business gifts

I will remember the following when I am offered a gift by a customer, supplier, dealer, or distributor:

- I will politely decline gifts whenever possible. I **must** refuse gifts offered by someone to whom the company might give business. If I am offered a gift, I will refer to our Global Gifts, Entertainment, & Meals Policy.
- I will not ask for gifts.
- I know cash and cash equivalents (including gift cards) are not acceptable gifts.

When I offer gifts:

- I know that gifts must be marked with company branding (if possible) and approved.
- I know cash and cash equivalents (including gift cards) are not acceptable gifts.
- I understand that gifts must be low in value, appropriate, and lawful.
- I will make sure gifts are approved and accurately recorded.
- I will make sure gifts do not create the appearance of inappropriate advantage or influence. I will also make sure that they do not violate recipient policies.
- I will refer to the Global Gifts, Entertainment, & Meals Policy for details on giving gifts.

Gift-giving guidance

Our best practice is to refuse gifts, but sometimes that may not be possible. Use these questions to ensure gift exchanges are handled with transparency and integrity. If any answer is unclear, check with your manager or a Compliance Ambassador.

Click through the following questions to ensure gift exchanges are handled with transparency and integrity.

Does exchanging this gift seem wrong or embarrassing?

YES NO

Could this gift be considered an improper payment or attempt to influence?

YES NO

Is this gift being exchanged with the expectation of a return?

YES NO

Is this gift being exchanged based on the strictest applicable policy?

YES NO

Have all necessary approval and reporting processes been followed?

YES NO

Exchanging business meals and entertainment

Part of making strong connections includes sharing meals and entertainment with customers, suppliers, dealers, and distributors. When exchanging these business courtesies, I will keep the following in mind:

- I will limit meals and entertainment to guests who have business reasons for attending.
- I will keep meals infrequent, reasonable, and reciprocal.
- I will keep entertainment appropriate and reasonable, according to the expectations of my manager, unit, or organization.
- I will pay for my own meals and entertainment when possible.
- I will seek approval for or report entertainment or business meals I give and receive as outlined in the Global Gifts, Entertainment, & Meals Policy.
- I understand that if a customer, supplier, dealer, or distributor offers entertainment without attending, it becomes a gift. I will then treat it according to the gift guidelines.
- I will refer to the Global Gifts, Entertainment, & Meals Policy for details on giving and receiving business meals and entertainment.

Our resources

Global Anti-Bribery Policy
Global Gifts, Entertainment, & Meals Policy
Country and regional gift policies
Global Travel Policy

We respect people's privacy

Our responsibility

The company is trusted with personal data from our customers, employees, and other stakeholders. We must live up to that trust by handling personal data appropriately.



Why we are responsible

Demonstrating our commitment to protecting the information entrusted to us ensures we earn that trust. Our company is committed to conducting global business in a way that supports and ensures the responsible use of personal data.

Privacy and AI (NIST/RISK) by Design Assessment (PANDA)

Q: I am developing a new company process that collects personal data from customers. What protections do I need to put in place to protect the personal data?

A: If your process collects personal data, the first step is to enter it into the Privacy and AI (NIST/RISK) by Design Assessment (PANDA) tool. This tool will document your process and assist in determining the appropriate measures needed to protect the personal data. This is especially important for any personal data that will be collected in the European Union, the United States, China, and Brazil. For further guidance, see the Privacy and AI (NIST/RISK) by Design Assessment (PANDA) site.

How I act responsibly

I will protect others' data by doing the following:

- I will follow the Global Privacy Policy, Binding Corporate Rules, company procedures, and regulations to ensure we meet our privacy and personal data obligations.
- I will be transparent when collecting, processing, and using personal data and consistent with any applicable notice provided, including the Enterprise Privacy Statement.
- I will complete all assigned privacy training to better understand our privacy obligations.
- I will safeguard personal data through appropriate security practices to prevent unauthorized access, use, or loss.
- I will act ethically and with integrity when handling personal data.
- I will report any potential data incident by clicking on the "Report an Incident" button at the top of the Global IT Security homepage. Employees in organizations not yet integrated with the Deere network should follow their organization's reporting procedures.

Our resources

Global Privacy Policy

Binding Corporate Rules

Enterprise Privacy Statement

How we run: Our company 36

We avoid conflicts of interest 37

We prevent insider trading..... 39

We protect confidential information and intellectual property 40

We use company property responsibly 43

We protect the company from cybersecurity threats..... 44

We create, maintain, and manage accurate records..... 47

We value product safety and high quality standards 48

How we run: Our company

Our company runs best when we are in alignment with our core values. This means we focus on quality and innovation while doing business with commitment and integrity.

We avoid conflicts of interest

Our responsibility

In any business matter, we do what's beneficial for the company—not ourselves. We avoid situations that may create or even appear to create a conflict of interest. A conflict of interest occurs when there are circumstances that might cause us to act in a way that benefits us instead of the company.



Why we are responsible

Our business is more productive when we maintain our objectivity without distractions or divided loyalties. These distractions or divided loyalties appear in situations involving conflicts of interest.

Conflicts of interest can harm the company even if we don't deliberately act on them. People may doubt our fairness based on even the appearance of a conflict of interest. And we want to both *be* fair and *appear* fair.

We should not hide a potential conflict of interest when it arises. We should be transparent and disclose the conflict through our online reporting system. By notifying the company, we receive help in handling the situation. Or together we may determine that the situation is not a conflict of interest and that no further action is required.

Conflicts of interest

Possible conflicts of interest might include:

- A close personal, family, or romantic relationship with someone in one's span of control at the company (a span of control includes the ability to influence within the same operating unit, functional area, and direct or indirect reporting chain.)
- A friendship or relationship with a supplier, dealer, distributor, customer, or competitor
- Investments in or work with another business based on company information
- Acceptance of an offer of employment from or work with a customer, competitor, supplier, dealer, or distributor
- A seat on another company or organization's board of directors
- Ownership of stock or other investments in a supplier, dealer, distributor, customer, or competitor

Conflicts of interest may appear in the following areas.
Click on each area for examples.



Be mindful that these potential conflicts of interest don't end with us. Family members or others close to us need to avoid situations that create conflicts of interest for us.

How I act responsibly

To help anticipate and address conflicts of interest, I will remember the following:

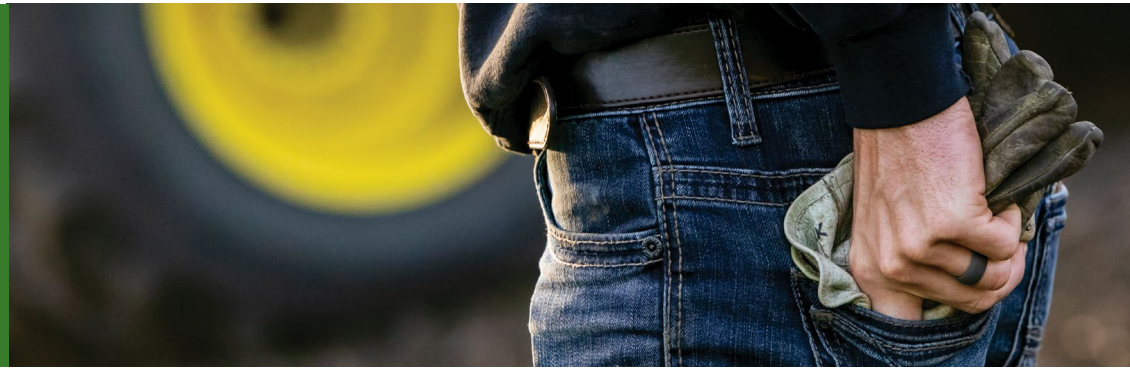
- I will avoid situations that create conflicts of interest.
- I will disclose my potential or actual conflicts of interest to my manager and report them through the company's online reporting system.
- I will follow company guidance regarding how to handle any conflicts of interest.
- I will report concerns regarding coworkers' potential conflicts of interest to a manager, a member of the legal department, or to the John Deere Compliance Hotline.

Our resources
Global Conflicts of Interest Policy
Conflict of Interest Online Reporting System

We prevent insider trading

Our responsibility

All of us are required to protect the company's confidential information in all contexts. This protection is especially necessary if and when we participate in trading stocks, bonds, or other securities.



Why we are responsible

Given our commitment to innovation, many of us may encounter information people outside the company don't know. Whether we work on new technologies or not, our priority is protecting material, non-public information (also known as *inside information*) related to us, our suppliers, distribution channels, peer companies, competitors, or others. Inside information is information that a reasonable investor would consider important when making an investment decision about securities. Some examples of this information include:

- Earnings and earnings forecasts not yet released
- Significant new product developments
- Merger, acquisition, or divestiture discussions
- Other significant events that could impact the securities price of the company, a supplier, a dealer or distributor, or another company

Inside information needs special protection because it affects which securities people purchase. Making an investment based on this information, or insider trading, is against the law. Providing inside information to others who use it to make investment decisions (also known as *tipping*) is also illegal. Both can result in severe sanctions, fines, and criminal penalties against the employee and the company. We always need to safeguard this kind of information, no matter who owns it.

How I act responsibly

I will honor the company's trust when accessing confidential information by observing the following:

- I will only trade securities based on public information.
- I will distribute public company information honestly.
- I will not trade any securities based on material, non-public information.
- I will not share inside information unless I have authorization.
- I will not disclose confidential information so someone can use it to buy or sell securities (i.e., *tipping*).



Q&A: Selling stock

Q: I recently heard about a new technology John Deere is implementing. Then a friend approached me asking for advice. My friend is thinking of investing in a company I know we'll be using as a supplier. What should I do?

A: You have inside information, and you may not reveal any of it to your friend. You may discuss this situation with your friend if you only talk about public information. Concerned keeping the inside information private would be too difficult? You could tell your friend you aren't allowed to discuss it at the current time or you aren't familiar with the other company. Or you can recommend your friend research it independently.

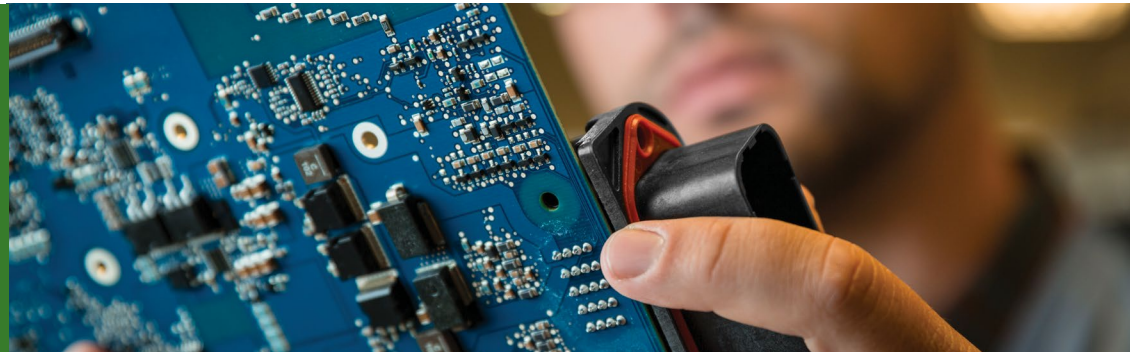
Our resources
Global Insider Trading Policy



We protect confidential information and intellectual property

Our responsibility

We work very hard to develop our intellectual property. We should work just as hard to protect it.



Why we are responsible

What if our intellectual property, such as details of our technology or confidential business plans, were taken or used, particularly by competitors? Our reputation for innovation could be damaged. We could lose exclusivity for our unique products and features. Alternatively, our fair pricing, promotions, or offerings might become less effective.

If we misuse others' confidential information, the same thing might happen to them. We don't want to cause that for anyone, such as suppliers who entrusted information to us or competitors with whom we want to compete ethically and legally. So, we safeguard all confidential information and intellectual property when doing business.

Our resources

Global Copyright Policy
Global Electronic Resources Policy
Global Information Classification Policy
Global Information Security Policy

How I act responsibly

To protect confidential information and intellectual property, I will do the following:

- I will protect the company's intellectual property, including copyrights, design rights, patents, trademarks, and trade secrets.
- I will use, share, and store confidential information per company policy.
- I will only access and distribute confidential materials necessary to my position.
- I will secure confidential information to which I have access.
- I will discuss and handle confidential information discreetly to protect it from being overheard or seen by others.
- I understand that intellectual property I create related to our business is owned by the company, and I will help the company protect and register it.
- I will not disclose any confidential information or intellectual property without permission.
- I will not misuse others' intellectual property.
- If I discover any confidential information has been improperly disclosed, I will report it to a manager, a member of the legal department, or the **John Deere Compliance Hotline**.

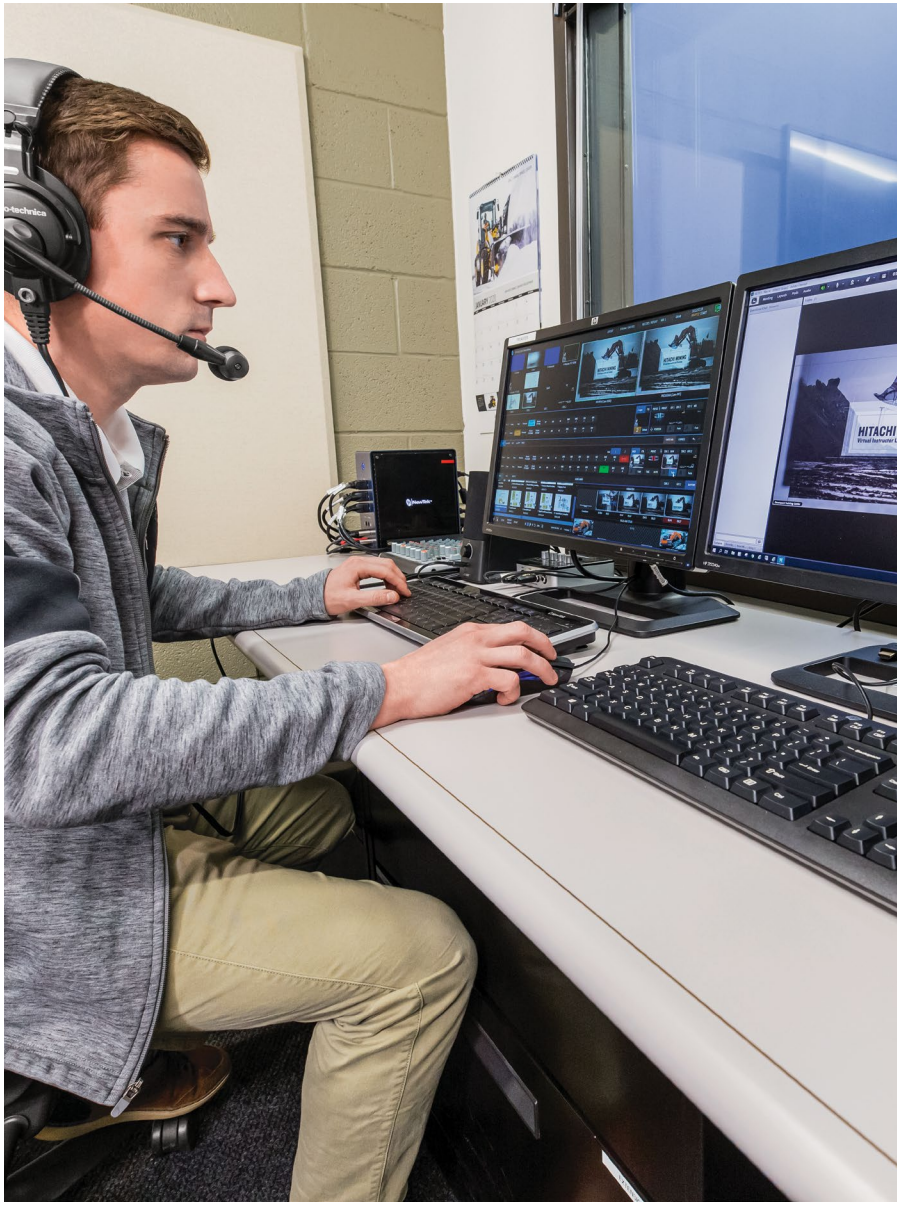


Q&A: Non-disclosure agreements

Q: I'm an engineer. Recently, I spoke with an engineer from a new supplier. The supplier asked me for certain specifications to help fill an order. I shared some information about our technical processes and our manufacturing site's design. Then a colleague asked me if I'd verified whether this supplier signed a non-disclosure agreement (NDA) first. I hadn't. What should I do now?

A: Immediately contact your manager or a member of the legal department. Hopefully, this supplier has signed an NDA and the information you provided is protected by that agreement. However, always confirm this before divulging what may be confidential information to a third party. This prevents any damage to our company's reputation or brand.

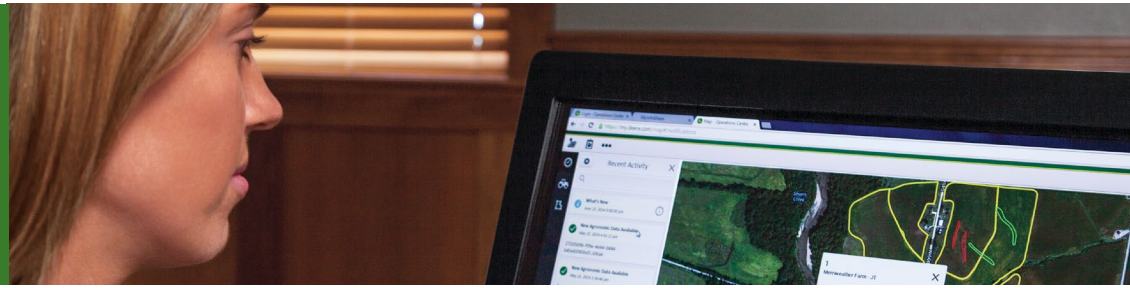
If it turns out that the supplier has not signed an NDA, contact Supply Management to ensure one is signed and to communicate to the supplier how the information you shared should be handled.



We use company property responsibly

Our responsibility

Consider how we use company property in some form every day. It's up to each of us to protect such assets and use them appropriately.



Why we are responsible

Much of what we do involves company property—from the brand logos we display proudly to our electronic devices and our workspaces. Company property also extends to travel and financial resources, like business credit cards. And don't forget our documentation. Even this Code belongs to the company.

Because our work depends on company property, we need to be careful with it and keep it secure. For example, company property, like computers, must be used appropriately, and travel expenses must be documented accurately.

By protecting and using company property appropriately, we maintain the high quality of our solutions and services.

Our resources

Global Electronic Resources Policy
Global Email Creation and Retention Policy
Global Information Security Policy
Global Travel Policy
Global Unmanned Aircraft Systems (UAS) Policy

How I act responsibly

I will do the following in order to treat each type of company property I use carefully:

- I will only use company property in a professional, authorized manner.
- I will secure and/or put away company property after using it.
- I will follow procedures when making purchases on the company's behalf.
- I will accurately record financial transactions and expenses.
- I will not misuse company computers, devices, or IT systems.
- I will not share business assets with those outside the company.
- I will not engage in communications that violate company policies.
- I will follow all rules related to company use of unmanned aircraft systems (drones).
- I will report any violations of these practices to a manager, a Human Resources or Labor Relations contact, a member of the legal department, or the John Deere Compliance Hotline.

We protect the company from cybersecurity threats

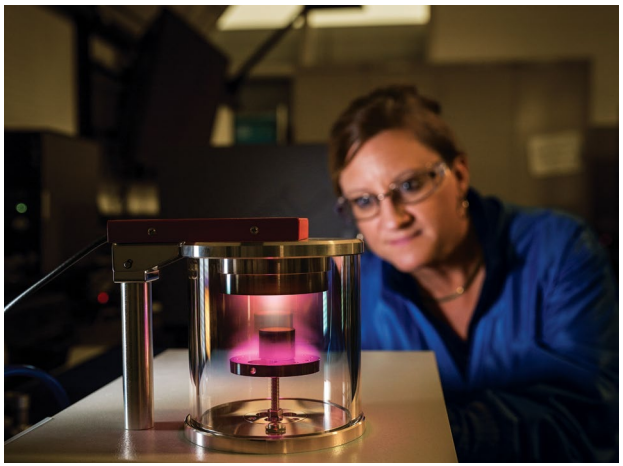
Our responsibility

We run our business using data and technology, which are increasingly important in the products we sell. This makes them valuable to others. We are all responsible for protecting these crucial assets and tools against threats.

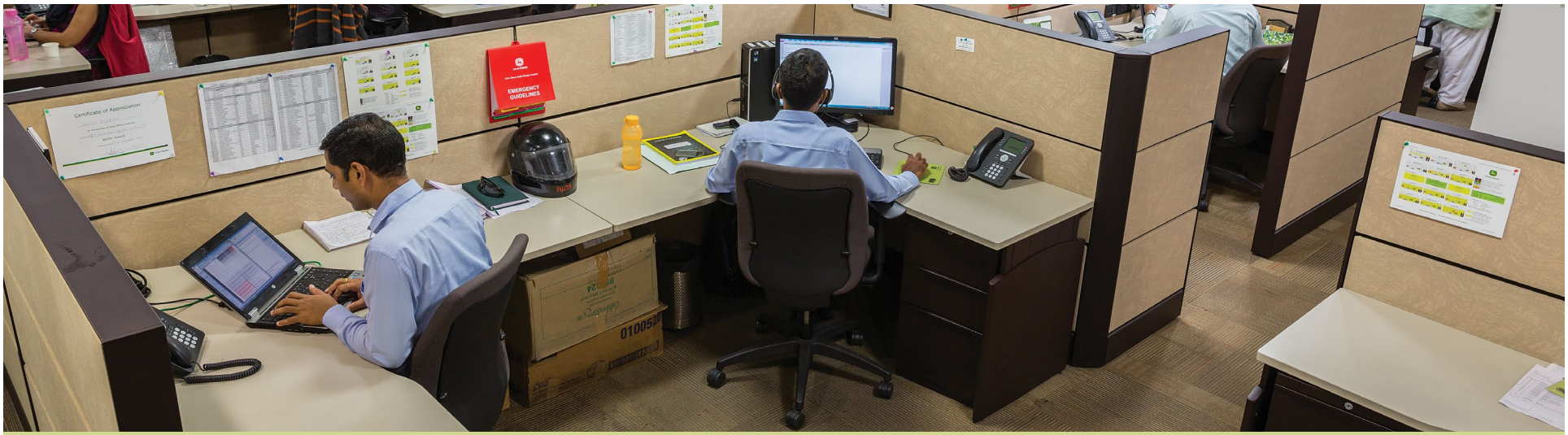
Why we are responsible

We must be cautious when using our information assets so they remain secure.

Unethical competitors, hackers, or others may use cybersecurity threats to try stealing our information or compromising our systems. We protect our data and assets when we use our systems and devices securely.







FAQ: Cybersecurity

We must stay alert and speak up if we see something that could be a cybersecurity incident.

Q: What does the company consider an *incident*?

A: An *incident* could be an action that potentially causes data exposure or loss and/or suspicious account activity. Examples include:

- Noticing an abnormal amount of data is being extracted from an application
- Discovering an application is providing access to data that it shouldn't
- Discovering data has been deleted from an application
- Noticing confidential company information is publicly exposed in a third-party application
- Discovering abnormal activity on a system
- Discovering company application credentials in a public repository
- Discovering an email account has been compromised
- Receiving a suspicious phone call, text, or email on your company asset/device

Q: How do I report an incident?

A: Click the "Report an Incident" button at the top of the Global IT Security homepage or report it through the John Deere Compliance Hotline. Employees in organizations not yet integrated with the Deere network should follow their organization's reporting procedures.

Q: What is *social engineering*?

A: *Social engineering* is the art of manipulating people so they perform actions or reveal confidential information. This can be done over the phone, via email or text messages, through social media or chat apps, or carried out in person.

Q: What is *phishing*?

A: *Phishing* is a form of social engineering that attempts to use email or malicious websites to acquire information by pretending to be a trustworthy source. One example is an email asking someone to respond with their account password so it can be reset. This tricks a user into revealing confidential information that may then be used for fraudulent purposes.

How I act responsibly

I will help protect the company from cybersecurity threats by doing the following:

- I will be vigilant against signs of cybersecurity threats, such as phishing emails and social engineering attempts.
- I will follow company information security policies and guidelines.
- I will create private, complex personal passwords and passphrases.
- I will avoid knowingly accessing or sharing sensitive electronic information, unless I have authorization.
- I will limit the sensitive information I send over email; if sending sensitive information, I will properly protect it.
- I will only use open-source software in accordance with company open-source procedures.
- I will refrain from interacting with emails that contain suspicious links or attachments.
- I will refrain from signing on to free or unsecured public networks with company devices or accounts without being logged on to the company virtual private network (VPN).
- I will report any potential cybersecurity threats, including attacks on our suppliers or other business partners, to my manager and Global Information Security.
- I will close and lock any company devices or accounts when not using them.
- I will ensure my company devices are physically secured whenever they are not in my possession.
- I will report any lost or stolen equipment to my manager and Global Information Security.



Our resources

Global Electronic Resources Policy
Global Email Creation and Retention Policy
Global Information Classification Policy
Global Information Security Policy

We create, maintain, and manage accurate records

Our responsibility

Our reputation is based on the safety, quality, and reliability of our products, technologies, solutions, and services.



Why we are responsible

We prepare and preserve records that relate to company finances and business activities. We excel by making responsible, lawful decisions that are based on accurate records. A fundamental part of meeting our legal obligations is creating records that precisely reflect the transactions we make.

Q&A: Maintaining records

Q: I took over for a colleague who's transferring to another department. During our transition, I found out this colleague kept a large number of files. Do I need to save them?

A: When transitions occur, it's especially important to identify and review both physical and electronic files. In this situation, if the colleague who is transferring is still with the company, then that individual should be heavily involved in deciding the files' status. You could also consult with your manager for guidance. Generally, deciding whether to save files depends on what types of files they are. If we need them for business operations or to show compliance with relevant laws, then you should keep them. The Global Records Retention Schedule guides our decisions on all records. We should refer to the schedule before disposing of records. Check with the legal department to see if any legal holds may apply or if you have questions.

How I act responsibly

I will do the following in order to document information with attention and precision:

- I will manage records in accordance with company policies and guidance.
- I will keep precise records, particularly financial ones.
- I will use the company's internal controls when managing records.
- I will refrain from misusing any company records, resources, or documents.
- I will store company records only at company-approved locations.
- I will classify information appropriately in order to protect company information and maintain the trust of stakeholders.
- I will contact the legal department if I have any questions about creating or disposing of company records.
- I will report any misuse of records to a manager, my Human Resources contact, a member of the legal department, or the **John Deere Compliance Hotline**.

Our resources

Global Electronic Resources Policy
Global Email Creation and Retention Policy
Global Information Classification Policy
Global Information Security Policy
Global Records Management Policy

We value product safety and high quality standards

Our responsibility

Our reputation is based on the safety, quality, and reliability of our products, technologies, solutions, and services.



Why we are responsible

Using our general rule for product safety as our guide, we strive to create safe and reliable products for our customers. In addition to complying with regulatory requirements, our designs meet or exceed the intent of relevant and applicable industry safety standards. We further support our customers by innovating and providing the best possible service and support.



How I act responsibly

I will uphold our commitments to safety and quality. In particular:

- I will continue to build my understanding of customer needs.
- I will be guided by our core values in all areas of my work, including safety.
- If I encounter a potential safety or quality issue, I will report it to a manager or the unit product safety representative.

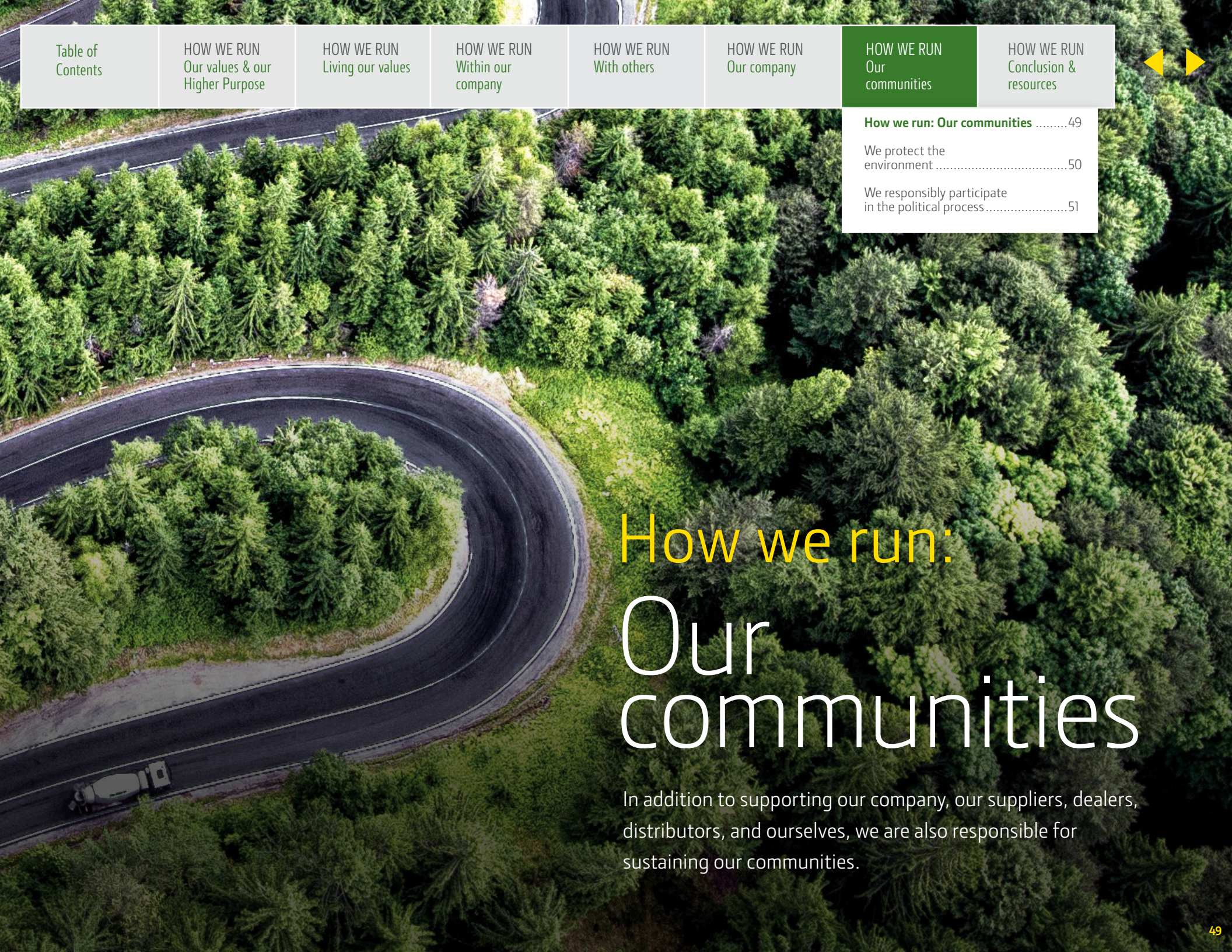
Our resources

Global Environment, Health, and Safety Policy

How we run: Our communities 49

We protect the environment 50

We responsibly participate in the political process 51



How we run: Our communities

In addition to supporting our company, our suppliers, dealers, distributors, and ourselves, we are also responsible for sustaining our communities.

We protect the environment

Our responsibility

Designing environmentally efficient workplaces and creating sustainable, environmentally sound products are among our biggest priorities.



Why we are responsible

Fundamentally, preserving the environment affects how we run at the unit level. In each unit, we strive for compliance, energy efficiency, and sustainability. We consider ecological impacts when making decisions. We report environmental incidents as required by local laws and regulations. Each of our manufacturing units also has a management system dedicated to the environment.

Environmental consciousness also matters when we develop new products and technologies. Our innovations balance compliance, safety, and sustainability. We address customers' needs while also respecting the natural world.



How I act responsibly

I will help protect and preserve the environment by doing the following:

- I will abide by applicable environmental legal standards and requirements.
- I will manage my resources responsibly at work.
- I will try to conserve my use of water and energy in the workplace.
- I will try to reduce the amount of waste I create at work.
- I will consider environmental factors when making decisions.
- I will report any violations of our Global Environment, Health, and Safety Policy to my manager, my Human Resources or Labor Relations contact, a member of the legal department, or the **John Deere Compliance Hotline**.

Our resources

Global Environment, Health, and Safety Policy

We responsibly participate in the political process

Our responsibility

Sustaining our societies also means taking part in the politics that govern them. We should always participate in the political process responsibly and with integrity.



Why we are responsible

As individual citizens, we have the right to add our voices to our government and stand up for what we think matters. We may contribute, if we wish, to the political causes we choose. The company respects and supports our right to participate in political causes as individuals, outside the workplace. Individual political action is up to us.

We do not, however, have the right to bring our personal political interests into the workplace. We also don't have the right to engage in politics on the company's behalf. Our personal politics should not mix with the company's business. It's important to not give the impression that our individual beliefs belong to the company.

Similar to engaging with media, we should never engage in political activity on behalf of the company unless authorized to do so. When questions arise, we should seek guidance from public affairs staff. It's their job to represent the company on policy and political matters that affect our business. We should also respect the ethical and legal restrictions that govern corporate political activity and guide the company's political engagement.

How I act responsibly

As an individual, I may take part in politics in any manner I choose consistent with the law and applicable company policies. However, I will consider the following before participating in political activity:

- I will only act on the company's behalf with respect to political issues if I am explicitly authorized to do so.
- I will ensure that any communications or statements I make are clearly identified as my personal views, not those of the company, unless expressly authorized by the company.
- I will refrain from using company time or resources to support a personal political cause, party, or candidate.
- I will check with a member of the public affairs staff or the legal department if I have any questions about participating in political activity.

Our resources
Global Anti-Bribery Policy
Global Conflicts of Interest Policy
Global Gifts, Entertainment, & Meals Policy

How we run: Conclusion & resources 52

Final statement. 53

Consequences of non-compliance.. 55

Policies, resources, and contacts. 54-55

How we run: Conclusion & resources

Our Code concludes with our thanks, a reminder of the importance of compliance, and a list of useful resources.

Final statement

Thank you for continuing to run with us.

Your integrity and commitment keep us in a position of strength. By following our Code, we continue to deliver the quality and innovation our customers rely on. We honor our commitment to support and provide them with value in the products, services, and technology we provide.

Consequences of non-compliance

Each of us must comply with the principles laid out in our Code and company policies. We should always do our best to live up to these standards and abide by applicable laws.

Should we have any doubts or concerns about how to achieve compliance, the best thing to do is ask. Depending on which area we have questions about, we can check with a manager or a member of the compliance department. The next section of the Code also provides links to policies, resources, and contacts to reference.

Complying and asking questions when necessary helps all of us avoid the unfortunate consequences that accompany non-compliance. Non-compliant actions can result in disciplinary action, fines, penalties, or termination. Following the law and acting ethically is good for employees and good for the company.

Policies

Visit the online **Compliance Hub** to view global compliance policies, including the following:

- Global Anti-Bribery Policy
- Global Conflict Minerals Policy
- Global Conflicts of Interest Policy
- Global Copyright Policy
- Global Drug and Alcohol Policy
- Global Electronic Resources Policy
- Global Email Creation and Retention Policy
- Global Environment, Health, and Safety Policy
- Global Export Controls Policy
- Global External Communication Policy
- Global Gifts, Entertainment, & Meals Policy
- Global Information Classification Policy
- Global Information Security Policy
- Global Insider Trading Policy
- Global Policy Against Discrimination & Harassment
- Global Policy Against Retaliation
- Global Privacy Policy
- Global Records Management Policy
- Global Reporting Policy
- Global Social Media Policy
- Global Supplier Communication Policy
- Global Tobacco and Smoke-Free Workplace Policy
- Global Travel Policy
- Global Unmanned Aircraft Systems (UAS) Policy
- Global Workplace Violence Prevention & Intervention Policy



Resources

Find further assistance and support via the resources below:

- Binding Corporate Rules
- Compliance Hub
- Conflict of Interest Online Reporting System
- Dealer Code of Conduct
- Gift Online Reporting System
- Sustainability
- Enterprise Privacy Statement
- John Deere Compliance Hotline
- Support of Human Rights in Our Business Practices
- Investor Relations
- Security.Deere.com
- Supplier Code of Conduct

Contacts

For any questions about the Code of Business Conduct or our policies, reach out to one or more of the below contacts.

- Global Ethics & Compliance
- **Deere & Company Vice President & Chief Compliance Officer**
- John Deere Compliance Hotline

  Compliance Hotline Committee
  P.O. Box 1192
  Moline, IL 61266-1192
  USA

- Legal Department
- Public Relations
- Supply Management Compliance
- **Your local Human Resources or Labor Relations Department**





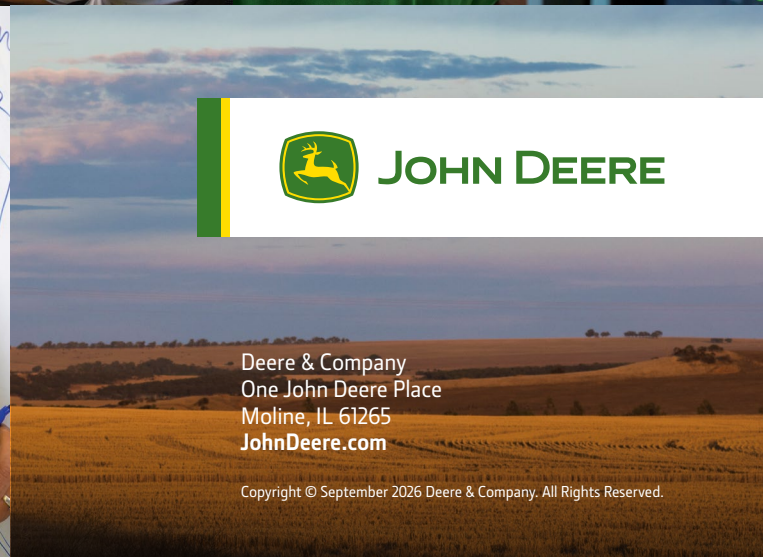










JOHN DEERE

Deere & Company
One John Deere Place
Moline, IL 61265
JohnDeere.com

Copyright © September 2026 Deere & Company. All Rights Reserved.