John Deere Colleagues:

Generations of hard work and honest achievement have made John Deere a name that attracts esteem and trust throughout the world. Our record of success is anchored by an unwavering commitment to ethical behavior and doing the right things in the right way. Deere’s dedication to integrity, nurtured over the course of almost two centuries, has helped build a brand that is widely known and revered.

Deere’s Code of Business Conduct spells out our commitment to ethical behavior. It ensures that our processes and approaches remain fresh and relevant. That’s especially important in today’s dynamic and ever-more-complex regulatory environment.

This is a time of change for our company. Competitive demands, legal requirements and customer expectations have never been greater. And the performance bar – whether in quality, innovation, profitability or growth – has never been higher. All that said, in spite of these pressures, our commitment to how we do business is not subject to revision or reconsideration.

Each of us has a responsibility to uphold the standards of honor and integrity that have defined Deere over its history. It is, in fact, our responsibility to safeguard those standards and make sure they are preserved for the benefit of future generations. For that reason, I urge you to read this document carefully and take its messages seriously. Consider how your actions and decisions affect others, including customers and colleagues. Don’t hesitate to raise concerns about activities or behaviors that seem inconsistent with this Code.

Thanks for placing your trust in John Deere and thanks for your efforts to ensure that our customers and others continue doing so as well.

Sincerely,

Samuel R. Allen
Chairman and Chief Executive Officer
Our company has a rich history upon which we’ve built our success. From our modest roots a one-man blacksmith shop where John Deere created his first self-scouring plow in 1837 to the global company you know today, we’re committed to those linked to the land.

We are also committed to doing business the right way. That means we act lawfully. It also means that how we conduct ourselves and our global work is more than just a matter of policy and law; it’s a reflection of our core values:

- Integrity
- Quality
- Commitment
- Innovation

As a company, these are the values in which we believe. By embracing our core values and putting them to work in our daily lives, we help maintain the confidence and support of our customers, shareholders, communities and others with whom we work.

Today, we are a company with employees around the world. While we have achieved tremendous global growth and aspire to sustain it, we must not lose sight of our commitment to our core values.
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How We Demonstrate Our Commitment

We all represent John Deere in everything we do. In doing so, we don’t just meet expectations. We go above and beyond. We act with integrity, accountability and honesty. This helps us grow as a company and earn the support of others.

Mary Jones, Senior Vice President and General Counsel

Applying our Code and shared expectations

At John Deere, we make a commitment to our stakeholders: that we’ll do business with integrity. This means telling the truth, keeping our word and treating others with fairness and respect. We conduct our business openly, honestly and fairly. We measure our accomplishments by how we achieve them as well as by the results themselves.

We honor human rights and respect the individual dignity of all persons globally. Our pledge to human rights requires that we understand and carry out our responsibilities consistent with company values and practices.

The John Deere Code of Business Conduct (our “Code”) outlines how we can and must demonstrate our commitment to integrity. As the laws that govern our global business evolve, our Code changes to accommodate new rules and policies.

It’s important that those doing business on behalf of John Deere do so in ways consistent with our values. As such, our Code, Our Guiding Principles and policies apply to all John Deere employees, subsidiaries and controlled affiliates. Relevant parts also apply by agreement to contingent workers, consultants, agents and independent contractors. Non-controlled affiliates are encouraged to comply as well.

If we learn of violations of our Code, policies, or the law, we will take prompt action. This may include terminating our business or employment relationship with the party or employee in question.
Section 1

Q: Who are “we”?
A: Throughout this Code, the term “we” is used to describe employees and officers of the company. We all share a responsibility to follow our Code, policies and the laws and regulations that apply to our work.

How We Demonstrate Our Commitment

As John Deere employees, we are required to:
- Read and understand our Code, work-specific policies, and Our Guiding Principles, and incorporate them into our work and behaviors
- Report potential illegal behavior, violations of our Code or referenced policies
- Not retaliate against an employee for making a report
- Fully cooperate with company investigations
- Complete all required training on time
- Ask questions when we’re unsure

If you are a manager at John Deere, you have additional responsibilities:
- Promote the Code, work-specific policies, and Our Guiding Principles, incorporating them into employees’ work
- Allow employees the time required to complete training on time and certify their compliance with the Code
- Set a positive example through your own behavior
- Make sure your employees know they can come to you with questions and concerns, and that you’ll listen and respond appropriately
- Do not make promises to employees beyond your authority, such as immunity or anonymity when they share a concern
- Do not create policies, rules or guidelines that are less restrictive than the Code

While circumstances may dictate otherwise, employees should generally keep investigations confidential unless prohibited by applicable law.

Complying with the law

John Deere is a United States-based company with global operations. This means we follow laws in the places where we do business. It also means there may be situations where we must follow US 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.
Understanding consequences for noncompliance

Remember: it is our responsibility to follow our Code, company policies and the law. Compliance is not optional. Failure to comply can carry serious consequences for the company. It can also carry serious consequences for you, including fines, civil and criminal penalties and termination. Disciplinary action will follow human resource policy and the data privacy, confidentiality, employment and labor laws of the country of employment. If you have questions or concerns about our Code or any of the rules, regulations, policies or laws that apply to your work, raise them with those individuals specified in the Code before taking action.

Making proper decisions and seeking assistance

Each of us must do the best we can to make good decisions. Even as capable individuals with good judgment and the best intentions, we may not always know the proper course of action to take. Our Code – along with other company policies, procedures, standards and resources – is designed to help us make proper decisions. You should follow the strictest applicable rule.

After reviewing the Code and related material, ask yourself a few questions to help make the right decision:

- Am I following the strictest rule in the Code or applicable policy?
- Am I being honest?
- What would others think?
- Would I feel comfortable if my actions were reported in the news?
- How might others be affected by my choice?
- How would my decision impact the John Deere reputation?

Sometimes it helps to talk through concerns to identify the problem and devise a solution. In these situations, you should talk with your manager and discuss your questions and concerns.

At times, we may need additional help to resolve a complex issue. If so, you may contact your Compliance Ambassador, Center for Global Business Conduct staff or someone else listed on the Code Resource Contact List.
Reporting and non-retaliation

We all share a responsibility to report concerns of actual or potential misconduct. This includes violations of the Code, referenced policies and the law. If you witness or otherwise learn about a potential violation or an illegal act, or are asked to commit one yourself, you must immediately, and without investigating, report it to one of the following:

- Your immediate manager
- Your manager’s manager
- Your Human Resources or Labor Relations contact
- Your Compliance Ambassador or Center for Global Business Conduct staff
- The Director of Finance/Accounting with responsibility for the area
- The Office of the General Counsel with responsibility for the area
- Deere & Company Vice President, Internal Audit
- Deere & Company Chief Compliance Officer
- Deere & Company Senior Vice President and General Counsel
- The John Deere Compliance Hotline

The John Deere Compliance Hotline is operated by an independent company. It is available 24 hours a day, seven days a week, in multiple languages. The Hotline can be used by anyone within or outside of John Deere to make a confidential report. To access country-specific Hotline information, see the posters on display at each unit or go to the John Deere intranet, which lists country-specific phone numbers. You also may access the John Deere Compliance Hotline website to make a report, or write to the John Deere Compliance Hotline at:

Compliance Hotline Committee
P.O. Box 1192
Moline, IL 61266-1192
USA
How We Demonstrate Our Commitment

Our company takes every report seriously. If you report a known or suspected violation, be assured it will be addressed thoroughly and promptly. After making a report to the Hotline by phone or internet, you will receive an access code you can use to view the status online, submit supplemental information or respond to requests for additional information.

John Deere will not tolerate anyone taking action against you for making a report. This is true even if an investigation does not uncover any actual misconduct. If you feel that you have experienced retaliation at John Deere because you submitted a report, you should discuss the issue immediately with any of the resources listed on the previous page.

For more information on making reports and what happens when a report is filed, please see the following policy found on the Global Policy Index:

– Global Reporting of Potential Business Conduct Violations and Anti-Retaliation Policy

Learning about compliance

Our Code is a valuable tool for making the right decisions, but it isn’t our only resource. Our company also provides various training courses dealing with the topics outlined in this Code, giving us more detail and direction in difficult areas. You must complete all required training courses on time.

Certifying our compliance

We are expected to complete a compliance certification annually. We are expected to report potential or existing conflicts of interest annually and also report conflicts immediately when they arise. The online Compliance Certification Process and Conflict of Interest Reporting system can be found at https://compliance.deere.com/coi/complianceLogin.do. Compliance with these processes serves two purposes:

– It lets our company know that we have read, reviewed and understood the expectations at John Deere
– It allows the company to maintain a record of potential and existing conflicts of interest, and gifts received
How We Treat Others in Our Workplace

At John Deere, we set ourselves apart from the competition through the contributions of our people. We foster a working environment that promotes respect and acceptance. Working together, we remain an employer of choice.

Max Guinn, President, Worldwide Construction & Forestry Division

Creating an inclusive environment

Having a diverse range of backgrounds, talents and perspectives puts our company in a unique position to understand customer needs across the globe. Our combination of cultures and experiences allows us to make key connections with our stakeholders and ensures the continued success of our brand. It is important that we maintain this balance by treating each other with respect, even when our differences set us apart. We work together to make sure our workplace is inclusive and productive. These same principles apply outside the office when on company business.

Acting with mutual respect

At John Deere, we strive to provide a positive work environment. This means that regardless of our differences, we can work without fear of discrimination, harassment or retaliation. Employment decisions – for example: hiring, promotions, terminations and transfers – are based on individual merit.

John Deere does not tolerate discrimination related to any of the following:

- Race
- Color
- Religion
- Age
- Sex, sexual orientation, gender, or gender identity or expression
- National origin or geographic background
- Disability
- Any other classification protected by applicable law
Section 2

Q: I had a recent business trip with my manager and a few of my colleagues. At dinner, they were loud and obnoxious, and told racist jokes. Their behavior made me uncomfortable, and I’m starting to dread having to work with them. What can I do?

A: Ideally, you would have said something to them at the time of the incident, and they would have stopped the inappropriate behavior. If you didn’t feel comfortable saying something at the time, or still feel uncomfortable with the situation, it’s time for you to let the company know. We are all expected to be on our best behavior while representing John Deere, including while traveling. Not only were your colleagues’ actions reflecting poorly on John Deere, they were also making you uncomfortable. You should report the behavior immediately. John Deere will not tolerate any retaliation against you for making a report.

How We Treat Others in Our Workplace

Similarly, John Deere does not tolerate harassment of any kind, whether written, verbal, physical or visual. Although laws and behavioral customs can vary from country to country, at John Deere, harassment is not accepted or tolerated. Some examples of harassing behavior include:

– Inappropriate or offensive jokes and comments
– Inappropriate conduct or contact
– Threats
– Sexually suggestive statements or actions

If you witness or experience any form of discrimination or harassment, you need to report it right away. John Deere will not tolerate retaliation against anyone making a report.

For more information, please see the following policy found on the Global Policy Index:

– Global Policy Against Discrimination & Harassment

Creating a safe and healthy place to work

We work hard and with purpose at John Deere. We strive to work as safely as possible. We avoid unnecessary risks to ourselves, others and the company. John Deere is committed to providing a safe and healthy work environment.

To do your part, you must complete applicable safety training. If your job requires you to use personal protective equipment, you must know how to use it properly. If you do not know how to use it, you must ask. Check your unit global policies and procedures to ensure you are following proper safety protocol.

Workplace violence

A safe and healthy environment is free from violence. An act of violence can take many forms. It can be a verbal, written or physical threat. It can be an act of intimidation or abuse. It can be a physical assault.

If you witness an act of violence in the work environment, between your coworkers or others, report it right away. If the situation escalates and there is a threat to your immediate safety or the safety of those around you, take action to ensure your own safety and contact local company security or Human Resources.
Section 2

Q: I recently overheard an argument between two of my coworkers. At first, I didn’t think much of it. But as the argument became more heated, they started raising their voices and being confrontational. At one point, it became apparent that there might be a fight. I wanted to step in, but at the time, 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 is unacceptable. Violence doesn’t just pose a risk to the two of them – it endangers 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.

How We Treat Others in Our Workplace

Use of alcohol, tobacco and illegal drugs
Drugs and alcohol may impair our judgment and motor skills, and put our coworkers, customers and others at risk of harm. Tobacco may harm our own health and the health of those around us.

We may not possess or use alcohol or illegal drugs while on company property or while conducting company business. The exception is that during business dinners and events, or in designated areas, we may provide and drink alcohol in moderation, where permitted by law. The use of any tobacco product while in a company facility or vehicle is prohibited, except in designated areas. Designated areas may be determined by business management, but must comply with local laws and regulations. Above all, we must be sure to act appropriately, professionally and safely when representing John Deere.

Safety and security
John Deere has established policies which help us know how to keep our workplaces and employees safe and secure. To enable safe travel we are required to follow the Global Travel Policy.

John Deere has established a Global Crisis Management Plan to deal with emergency situations. Each unit also has specific emergency planning and scheduled exercises to help us prepare for these situations. If you are unsure of the proper steps to take during an emergency, ask your manager to help you prepare.

For more information, please see the following policies found on the Global Policy Index:

- Global Travel Policy
- Environment, Health and Safety Policy
- Global Workplace Violence Prevention Policy
- Global Drug & Alcohol Policy
- Tobacco and Smoke-Free Workplace Policy
How We Work with Others

To sustain our long-term success, we need to have mutually beneficial relationships when conducting business. We actively seek to create and strengthen relationships with those who share a similar vision. The high level of integrity we maintain also ensures others want to work with us.

Jean Gilles, Senior Vice President, John Deere Power Systems, Worldwide Parts Services, Advanced Technology & Engineering, and Global Supply Management and Logistics

Working with others

At John Deere, we maintain high standards for the way we interact with others. We treat suppliers, members of our distribution channel, customers and government agencies fairly, openly and honestly. We choose to work with others who, like us, act with integrity.

John Deere does not use or condone the use of any form of forced or indentured labor or human trafficking in the supply chain, manufacturing or distribution of our products. We follow child labor laws in the locations where we work and expect others to do the same. Our work should not intentionally cause harm to individuals or communities.

Working with suppliers

Our suppliers help us meet our goals by providing products and services that are critical to our business. When choosing suppliers, we consider those who comply with laws and uphold values aligned with our own.

Suppliers are expected to comply with the Supplier Code of Conduct, which addresses the following key areas:

- Labor and human rights
- Health and safety
- Environment
- Ethics
Section 3

Q: In a recent discussion, a supplier contact told me about the great success her company is enjoying. She then mentioned that her organization and one of its competitors have been working together to divide the market and that it has had a significant impact on their business. Should I report what I’ve been told?

A: Yes. It sounds like this supplier may be engaging in activities that are restricting competition. This means our company may not be getting the best possible products and services for our money. It also means one of our suppliers may be engaging in illegal and improper behavior. You should immediately report what you heard to Supply Management, the legal department or Center for Global Business Conduct staff.

How We Work with Others

If you know or suspect that a supplier is violating company policies or applicable laws, immediately notify Supply Management, the legal department or Center for Global Business Conduct staff.

For more information on working with suppliers, please see the following policies found on the Global Policy Index:

– Supplier Code of Conduct
– Public Communications Policy
– John Deere Restricted Materials List (for suppliers)
– Global Reporting of Potential Business Conduct Violations and Anti-Retaliation Policy

Working within the distribution channel

Members of our distribution channel are a valuable part of our strategy. These members include independent dealers, distributors, merchants and agents. We recognize that distribution channel members (other than company-owned sales and service companies) are independent businesses and we treat them as such. We expect them to comply with laws and uphold values aligned with our own. If you have concerns, contact your Compliance Ambassador or Center for Global Business Conduct staff.

Working with customers

John Deere has earned a reputation with customers for making high-quality, dependable, safe products; and for responding to the unique needs of customers in various locations. To preserve this reputation and protect the brand, we have key responsibilities related to our customers. We strive to understand the specific needs of our customers and translate those needs into products and services better than any other competitor.

We design and manufacture safe and quality products by ensuring they meet our general rules for product safety found in the Environment, Health and Safety Policy. Wherever we sell our products, we strive to meet or exceed the intent of applicable industry safety standards and regulations. We also strive to provide quality customer service, product support and information needed to operate our products safely.

For more information on working with customers, please see the following policy found on the Global Policy Index:

– Environment, Health and Safety Policy
Working with governments

The global nature of our work puts us in contact with officials, employees and agencies of governments worldwide. In many of the countries where we operate, government officials and employees might work for universities, hospitals, energy companies, regulators or government-owned enterprises.

Whenever our jobs require us to interact with officials, employees or agencies of governments, we are responsible for knowing and complying with applicable laws. This includes laws that apply to giving gifts and entertainment to members of these groups. This also includes the use of current or former government officials or employees as consultants.

We respond to regulators’ requests for information, and comply with government testing and demonstration requirements. We ensure that the information we provide is current, accurate and responsive. We make certain that contract requirements are identified, communicated and fulfilled.

If a regulator requests information from you, notify the legal department or Enterprise Security & Preparedness before taking action on the request. Requests may be part of a lawsuit, search warrant or other legal process.

If you suspect that others with whom we do business are not upholding these principles in their interactions with the government, immediately contact your manager, Compliance Ambassador, Center for Global Business Conduct staff or the legal department.

For more information on working with governments, please see the following policies found on the Global Policy Index:

- Procedures with Respect to Visits by Non-US Government Officials
- Notice to Global Law Services of Litigation, Other Formal Proceedings, and Government Proceedings (B-1885)
How We Serve Our Communities

At John Deere, we know that being a good corporate citizen inspires employees, motivates customers and extends our competitive advantage. It’s also the right thing to do. We are committed to giving back to our communities and beyond through philanthropy and volunteerism.

Marc Howze, Senior Vice President and Chief Administrative Officer

Investing in our global communities
We work to inspire positive change by focusing our efforts on solutions for world hunger, community development and education. We do this to strengthen our global communities and improve our stakeholders’ quality of life.

Responding to charitable funding, donation and gift requests
If you are active in the community, you may be asked to provide company funding, a donation or a gift to a charitable cause or community event. All requests must meet Corporate Citizenship Center of Excellence guidelines and be approved by your local unit management.

Volunteering in the community
As a John Deere employee, you are encouraged to take an active role in your communities by volunteering. When volunteering on behalf of the company, you should follow the Global Employee Volunteerism Philosophy and Guidelines, and any supporting policies as established by business units.

For more information, please see the Global Policy Index:
– Global Employee Volunteerism Philosophy and Guidelines
Doing our part to preserve the environment

We place great value on environmental preservation, which is reflected in our operating processes. We work to reduce emissions, water usage and waste in our global operations. We strive to ensure our workplaces are energy efficient, environmentally sound, sustainable and compliant.

When investing in new products, approaches or technologies, we give preference to those that have the most favorable environmental impact. Significant resources and effort are dedicated toward designing innovative products that meet customer needs most effectively and efficiently. Our products are also designed toward meeting compliance requirements, minimizing environmental disruption and sustaining natural resources.

John Deere is subject to legal and regulatory standards for environmental protection that vary by country. We work to comply with these requirements everywhere we operate, often exceeding them.

We are expected to commit to sound environmental and safety practices. All units must incorporate environmental impacts and risks into management decisions, have an environmental management system, and report environmental incidents as outlined in compliance-assurance processes. Additional responsibilities are outlined in the Environment, Health and Safety Policy.

For more information, please see the Global Citizenship Report or the following policy found on the Global Policy Index:

– Environment, Health and Safety Policy

Q: I’m involved in volunteer efforts in my local community and I enjoy giving back. Sometimes, I participate in activities that John Deere sponsors. Other times, I opt to support activities that John Deere does not sponsor. Since John Deere is an avid supporter of volunteerism, is it appropriate for me to donate my time to a local charity on behalf of our company?

A: It depends on whether you followed the Global Volunteerism Philosophy and Guidelines and any supporting policy established by your business unit. Check with the Corporate Citizenship Center of Excellence or ask your manager. Keep in mind that in some countries you may need to obtain a government permit to volunteer for a local activity.
Recognizing and avoiding conflicts of interest

One of our primary responsibilities while working for John Deere is to act in our company’s best interest. When our self-interests interfere, or even appear to interfere, with those of our company, it creates what is known as a conflict of interest.

Conflicts of interest can make it difficult for us to perform objectively and effectively for John Deere. We need to avoid them wherever possible. When there is a potential or actual conflict of interest, we have a responsibility to disclose it immediately.

Any potential or actual conflicts need to be immediately disclosed to your manager and immediately reported through the company’s online reporting system. This provides transparency and enables possible additional approvals. If you do not have access to the online reporting system, report the potential conflict to your Human Resources representative.

Potential conflicts of interest might arise in a number of ways. This section explains some of the more common situations and how to address them.

Workplace reporting relationships

At times, our relationships with others in our span of control can lead to the appearance of favoritism or impropriety. These relationships may be ones with a relative or someone with whom we are romantically involved. Our span of control includes the ability to influence within the same operating unit, functional area, direct or indirect reporting chain.

Being open about our relationships with people within our span of control helps us avoid conflicts of interest. For this reason, if you find that you may be in such a situation, you must immediately report your relationship to Human Resources and through the online reporting system (unless such reporting is prohibited by local law).
Section 5

Q: My brother owns a trucking company and wanted to become a John Deere supplier. I am involved in the supplier selection process for trucking companies. I thought this company would be a good match for John Deere, but I knew my family relationship could make me look biased. Even though I felt confident that I could be objective, I thought I should let my manager know about the situation beforehand. My manager thanked me for telling her then removed me from the selection process. Did I do the right thing to avoid a potential conflict of interest in this situation?

A: Yes. Your manager removing you from the selection process was not a punishment. It was a way of ensuring that both John Deere and your brother’s company had a fair opportunity to assess each other’s needs. Although you may be able to make unbiased decisions when it comes to family members, your involvement can still create the appearance of favoritism. You did the right thing by telling her beforehand. You should also promptly report the matter through the online reporting system.

How We Maintain Integrity and Loyalty to John Deere

Business relationships
A potential or actual conflict may arise if an employee has a close friendship or family relationship with a supplier, dealer, customer or competitor. This relationship may improperly influence the employee’s decision making about ongoing or new business opportunities. For this reason, you must promptly report any potential conflict to your manager and through the online reporting system.

Personal business or investment opportunities
We must not use information that we learn about through our job at John Deere to take business or investment opportunities. We must not take the opportunities ourselves or help others to do so.

You may only take an opportunity if you disclose your interest and John Deere agrees there is no conflict. The key is seeking approval before acting in order to avoid creating a serious conflict. For this reason, you must promptly report the potential conflict to your manager and through the online reporting system.

Outside employment
Before taking on additional employment or doing any outside work, we need to consider how that work might affect our work for John Deere. Working for a business that could affect John Deere has an increased potential to create a conflict of interest. Such businesses include those involving customers, competitors, suppliers and dealers.

Prior to taking a job that may create a conflict of interest, you must disclose it to your manager and report it through the online reporting system. This rule also applies to your family members and members of your household. If they take such a job, you must disclose and report it the same way.

In addition to outside employment or work, you must not use company resources to conduct outside business or compete with John Deere. This includes time, funds, people and property.

Board membership
A conflict can also occur when we, a family member or a member of our household assumes a position on an outside board of directors. This includes corporations, trade associations, nonprofit organizations and more. All board memberships that are potentially related to John Deere’s business must be promptly disclosed and discussed with your manager and reported through the online reporting system.
Financial Interests
John Deere recognizes our right to manage our personal finances. We should be aware, however, that having investments in certain types of businesses could influence our judgment on company matters and appear improper. These types of businesses could include competitors, customers, suppliers and dealers. This potential conflict also applies to our family members and members of our household.

Where investments could appear to be a conflict of interest, you must promptly report them to your manager and through the online reporting system. Examples include:

– Owning more than one percent of the publicly traded stock of a competitor, customer, supplier or dealership
– Investing in a competitor, customer, supplier or dealership in a manner other than publicly traded stock
– Owning any individual share of stock in a company that we interact with through our job

Using company resources
In order to perform our daily jobs, we need access to the appropriate resources. Among other things, we use company equipment, facilities, vehicles, documents and money to do our work. We may also use the John Deere brand or logo. These assets must be used only for authorized activities, and not for personal or political purposes. We all have a duty to protect these corporate assets from loss, damage, theft and misuse. We should ensure their efficient use and avoid waste.

The Global Travel Policy outlines appropriate uses of travel resources, including proper uses of travel agencies and company credit cards.

We also must use John Deere’s computers, data and telecommunication resources lawfully, productively and in a security conscious manner. Our personal use should be reasonable and not interfere with our daily work. We should not use our company’s computer, phones or information systems to send or view statements or materials that are inappropriate, illegal, sexually explicit or otherwise offensive. We should be careful when writing emails, as electronic messages can easily be distributed to others and become a company record.

For more information on the use of company resources, please see the following policies found on the Global Policy Index:

– Electronic Resources Policy
– Email Creation & Retention Policy
– Global Information Security Policy
– Global Travel Policy
– Global Unmanned Aircraft Systems Policy

How We Maintain Integrity and Loyalty to John Deere
Avoiding bribery and corruption in government and non-government interactions

We will not make or receive improper payments. Improper payments compromise the John Deere brand and put our company and individuals involved at risk for criminal, administrative and civil penalties.

In many of the countries where we do business, laws have been enacted that strictly prohibit us from making or receiving improper payments anywhere in the world. Examples of such laws are the US Foreign Corrupt Practices Act, the UK Bribery Act and the Brazil Clean Companies Act.

Improper payments can take the form of bribes, kickbacks or facilitation payments. Improper payments might be offered as money, gifts, favors, honoraria, travel, entertainment or anything else of value. Examples of favors are donations to a charity supported by a third party or job offers to a relative.

To maintain our integrity, we will not:

- Offer, promise, authorize, give, request or accept a bribe, which is the giving or receiving of anything that may improperly influence individual decision-making, secure an improper advantage or improperly reward the recipient for past conduct
- Offer, promise, authorize, give, request or accept a kickback, which is the return of a sum paid or due to be paid as a reward for fostering business arrangements
- Make a facilitation payment, which is a payment made to an individual to speed up routine government actions, like issuing a permit

If anyone requests or offers a bribe or kickback, it should be refused and must be immediately reported to the legal department. As part of our compliance with these laws, we should not ask anyone to pay a bribe, kickback or facilitation payment on our behalf. Nor should we knowingly allow someone acting on our behalf to do so, or ignore signs that someone may be doing so. If you believe that someone acting on our behalf may be making or requesting an improper payment, you must immediately report it to the legal department.

How We Give and Receive to Avoid Improper Influence

We want to win business based on the quality of equipment, solutions and support we provide, and not based on any gift, entertainment or meal. As a normal expectation, we will fully adhere to the laws against bribery (and the intent of them) wherever we do business. Such practices will help us thrive sustainably in the long term.

Raj Kalathur, Senior Vice President and Chief Financial Officer
Section 6

Q: I am submitting a proposal to a government-owned business in a developing country. A public official implied that if I pay her a personal fee, she will ensure that my proposal receives special consideration. She assured me that this is a common practice. Although it doesn’t feel right, 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. You should not offer anything of value to anyone, including a government employee, in order to improperly obtain a special preference in the course of a business decision. Report the request to the legal department right away.

How We Give and Receive to Avoid Improper Influence

In certain rare instances, you may be put in a situation where your personal health or safety could be in jeopardy. Your health and safety is paramount to John Deere. While this Code cannot directly address every possible situation, you must use your best judgment and protect your health and safety. After any incident, you must immediately report the situation to the Deere & Company Chief Compliance Officer.

For more information, please see the following policy on the Global Policy Index:

– Global Anti-Bribery Policy

Interacting with officials or employees of governments

We must be aware that interactions with officials or employees of governments are closely scrutinized for improper payments. Various country laws may apply to our interactions. To ensure you follow the law when representing John Deere, you must have company approval prior to giving absolutely anything to an official or employee of a government. You must also obtain company approval prior to receiving absolutely anything from such an individual. Company approval means you will obtain prior approval from the Deere & Company Senior Vice President and General Counsel or delegate and the appropriate Deere & Company Senior Officer or delegate. You will be deemed to have obtained these approvals if you have followed the processes in an approved country or regional gift policy or the Procedures with Respect to Visits by Non-US Government Officials. If you have questions, please contact your country or regional legal counsel.

Keep in mind that these required company approvals also apply to political contributions connected to John Deere. This includes anything given in connection with a non-Deere Political Action Committee (PAC). Also, while you are encouraged to participate freely in the political process, you must obtain these required company approvals prior to using company time, funds, facilities or other resources in relation to a candidate, political party, non-Deere PAC or political cause.
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Q: An official who is up for re-election has asked me to make a contribution on behalf of John Deere to a local community center. This seems like a great idea and something John Deere would support. I also figure that helping this official may help John Deere with future business needs, so everyone wins. Is this contribution okay?

A: No. Even if the community center seems like a good program, John Deere’s support of the center could be seen as giving the official a personal benefit (an improved chance of being re-elected) in return for an improper business advantage (the official’s support). You may not make this donation on behalf of John Deere, since the payment may be improper.

How We Give and Receive to Avoid Improper Influence

It may be difficult to know ahead of time what an official or employee of a government may give you. You should understand, and gain company approval beforehand for, what could be acceptable under the circumstances.

In some countries, it may be difficult to determine if the government owns a business. It may also be difficult to determine if an individual is an official or employee of a government. In these situations, you must obtain the same company approvals as required for government officials or employees.

For more information, please talk with a Public Affairs Worldwide representative on the Code Resource Contact List and see the following policies found on the Global Policy Index:

– Country and regional gift policies
– Global Anti-Bribery Policy
– Procedures with Respect to Visits by Non-US Government Officials

Interacting with non-governmental businesses

Giving and receiving gifts and other business courtesies can be a normal part of business relationships and is customary in some cultures. Nonetheless, we wish to avoid conflicts of interest when giving and receiving during interactions with non-governmental businesses.

Policies with more restrictive rules than those below may be created by business operations for regions, countries, functions and business units. Prior to doing so, they must seek the express approval of the Deere & Company Senior Vice President and General Counsel or delegates and the appropriate Deere & Company Senior Officer or delegates.

When interacting with non-governmental businesses, a few general rules and principles apply:

– Be transparent
– Follow the most restrictive country, regional, functional or business unit policy that applies
– Avoid conflicts of interest
– Avoid improperly influencing or appearing to influence business decisions
– Giving or receiving gifts, meals, entertainment, honoraria and travel could be seen by others as a conflict of interest
– Do not accept cash or cash equivalents for personal use, such as coupons, vouchers or gift cards
Rules for receiving non-government gifts
Gifts are something given directly to a specific group or individual. When you receive a gift you should generally return it. However, if you accept a gift, you must follow all company gift and reporting rules.

John Deere does not want you to accept gifts and you should not accept cash or cash equivalents. If, however, there is a business or cultural need to accept a gift, and the gift cannot be considered an improper payment, then you can accept it.

If you accept a gift of more than nominal value, you must let your manager know that you accepted the gift, and jointly decide what to do with it. A gift of nominal value is defined as a gift having a market value of $75 US (or local currency equivalent) or less, or a lower amount if your business unit has a lower reporting threshold.

Possible options for gift disposition include:
- Transfer the gift to a designated company representative at your unit
- Donate the gift to charity
- Share the gift with other employees, such as in the case of a gift basket
- Keep the gift

The process for the CEO and the CEO’s direct reports is for them to discuss gifts and disposition with the Senior Vice President and General Counsel, Deere & Company.

Everyone must also immediately report all gifts of greater than nominal value through the online reporting system. The report should identify the gift, the circumstances in which the gift was accepted, and the disposition. If you do not have access to the online reporting system, report the gift to your Human Resources or Labor Relations representative.

For more information, please see the following policies found on the Global Policy Index:
- Country and regional gift policies
- Global Anti-Bribery Policy

Rules for giving non-government gifts
When giving gifts with a fair market value over $75 US (or local currency equivalent) per person per day, you must obtain management approval. When you give gifts of John Deere products or services, you must also follow additional approval processes, due to tax and other considerations. If you have questions regarding giving gifts of John Deere products or services, contact your Compliance Ambassador. In all gift giving, we will not give a gift that we know would violate the recipient’s gift policy.

Q: I recently attended a conference paid for by Deere. I received a call saying I had won a raffle drawing for a top-of-the-line iPad. Can I accept it?
A: No, you should politely refuse the iPad if possible. In the future, it would be best to refrain from entering any drawings for prizes at conferences or events if you are attending as part of your job.

Q: A customer has offered me tickets to a big soccer game and invited me to sit in his VIP box, including food and drinks. The face value of the tickets is over $200 US. Can I attend?
A: If you feel there is a legitimate business purpose for attending the game, you should review the invitation with your manager and offer to pay for your own tickets. In case you accept the gift after consulting your manager, please don’t forget to register the gift in the online reporting system.
Section 6

Q: A John Deere dealer recently sent me an invitation to attend an open house. The dealer offered to pay for my travel expenses, meals and entertainment. He often gives each attendee a John Deere toy tractor with a fair market value greater than $75 US (or local currency equivalent). How should I respond to this invitation?

A: You should review the Code and discuss the invitation with your manager. We should generally pay for our own travel expenses and entertainment. If you eat with the dealer, you may accept the meals with the understanding that you will reciprocate in the future. If you have a meal outside of the event, you should pay for the meal. You should politely refuse the toy tractor gift if possible. If you accept the gift, you need to immediately discuss disposition with your manager when you return; follow a country, regional, functional or unit gift policy (if one exists); and immediately report it through the online reporting system. Because this is a complicated area, you should generally discuss invitations such as these with your manager.

How We Give and Receive to Avoid Improper Influence

Rules for giving and receiving non-government business meals
Regardless of who pays for a business meal, meals should be reasonable in both frequency and cost. Business meals should be limited to people who have a business purpose for attending. If others attend without a business purpose, they should pay for themselves. We should generally reciprocate in hosting meals and pay for meal expenses on a similar number of occasions.

Rules for giving and receiving non-government business entertainment
Although business meals are not considered entertainment for the purposes of this Code, we should apply the same principles to entertainment as we do to meals. In addition, we must keep in mind the following rules when we entertain, or are entertained, by others:

- You should act with integrity when choosing or accepting entertainment for a business event
- You should pay for your own entertainment whenever possible, and submit for company reimbursement as appropriate
- To give or receive entertainment with a fair market value over $75 US (or local currency equivalent) per person per day, management approval is required. For non-government business entertainment, management approval can take the form of active expense account approval after the fact
- You should report any entertainment you receive, if it exceeds $75 US (or local currency equivalent) per person per day, and you must report the entertainment through the online reporting system (you do not need to report entertainment that you give if it has been properly approved by management)
- If you cannot obtain approval ahead of time, use your best judgment, discuss it with management afterwards, and realize that you may need to later reimburse the other business
- Including a family member in business entertainment is prohibited unless you personally pay for the family member, there is a management approved business purpose for that person to attend or it is a management approved, company-sponsored activity
- If someone from the other business simply pays for your entertainment and does not attend, then the entertainment provided is a gift and is subject to the gift rules described above

Rules for non-government sponsored transportation and hotels
We should pay for our own transportation and hotels whenever possible. Any transportation or hotel accommodations you give or receive should be reasonable in both frequency and cost. If the cost exceeds a total fair market value of $75 US (or local currency equivalent) per person per day, you must obtain management approval. When you receive these items, you must also report them through the online reporting system. Additionally, when you are offered air travel paid for or sponsored by another business, you must follow the Supplier Aircraft Policy, which generally prohibits travel on supplier aircraft, as well as other policies. When the policy allows such travel, you must obtain management approval, and report through the online reporting system if over $75 US (or local currency equivalent).
Section 6

Q: I work in direct sales with customers and we sometimes agree to provide extended warranty or other services free of charge in order to secure deals. Do I have to report this as a gift?

A: No, gifts are items given directly to specific groups or individuals, such as (for example) if you agreed to pave the driveway of the general manager of the customer in order to get a deal. Items or services that are negotiated as part of commercial transactions are typically not considered gifts.

How We Give and Receive to Avoid Improper Influence

For more information on travel, please see the following policy found on the Global Policy Index:

- Global Travel Policy
- Supplier Aircraft Policy

Making proper decisions when giving and receiving

When faced with a situation of giving or receiving, consider the following questions as a guide:

- Could this be considered an improper payment?
- Is this being given or received with the expectation of something in return?
- Were all necessary approval and reporting processes followed?
- Is there a country, regional, functional or business unit policy?
- Might this involve an employee or official of a government?
- Could this lead to embarrassment if others knew?
- Is it being given away from the office or in secret?
- Does it seem wrong?
- Could this be perceived as an improper attempt to influence?

If you are unsure of the answer, you should contact your Compliance Ambassador or Center for Global Business Conduct staff.
Dealing fairly with others

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 our 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. And, in discussing John Deere products and solutions, we make honest, factual claims. We do not use misleading or unfair comparative advertising, nor do we use deceptive trade practices.

Abiding by international trade law

As a global company, we export our goods around the world. Exporting our products and solutions subjects the company to various local and international rules and regulations that govern trade. Before sending any product, service, technology or information to another country, it’s crucial that we know and follow applicable international trade, export control and import laws for these items.

Exports should be licensed or exempt from licensing. Additionally, before an item is exported, we are expected to verify that:

- The item is eligible to be exported to the intended destination
- The recipient, or end user if known, is not on a government “denied-party list”
- The intended end use is for a permissible purpose
- The proper duties have been or will be paid

John Deere’s import activity is also subject to various laws. We import both John Deere items and items supplied by external sources. These imports are subject to import restriction, payment of customs duties and filing of required forms and documents.

How We Compete in the Global Marketplace

John Deere is a global competitor. How we do business around the world is important because it’s a demonstration of one of our core values: integrity. We aim to compete vigorously, but fairly, while protecting our credibility in the global marketplace.

Mark von Pentz, President, Agriculture & Turf Division – Europe, Asia, Africa and Global Tractor Platform
How We Compete in the Global Marketplace

Although we are a global business, we are based in the United States. This means we are required to follow US laws that prevent us from agreeing to unsanctioned boycotts or other restrictive trade practices. Requests to participate in illegal boycotts can be written or verbal, and sometimes can be difficult to identify. All such requests must be reported to the legal department.

For more information on global trade laws, please see the following policy on the Global Policy Index:

– Global Export Controls Policy

Competing fairly around the world

No matter what, we believe in competing fairly. It benefits our company, our customers and the global marketplace. It allows us to gain an advantage through our superior product offerings, and gives our customers access to high-quality solutions at reasonable prices. When we compete lawfully and with integrity, everyone wins.

In our company, we choose to aim for or sustain a “preeminent” position. In a preeminent position, our customers choose to do business with us because we provide service, equipment and solutions they value most.

We do our part to keep things fair by gathering competitive information through legal and honest means. We do not collect information about our competitors through deception, manipulation or misrepresentation, nor do we ask a third party to do so on our behalf. If a new employee comes to John Deere from one of our competitors, we welcome the addition, but not any confidential information that person may have about their former employer’s business. Similarly, we must protect John Deere’s confidential and competitively sensitive information, even after we leave the company.
In many of the places John Deere operates, laws exist to help preserve fairness. These laws are sometimes called antitrust, competition or trade regulation laws. These laws prohibit certain actions that restrict competition, including:

- Setting prices with a competitor
- Dividing sales opportunities or territories
- Agreeing with a competitor to split bids or otherwise “fix” a bid
- Boycotting or refusing to deal with a supplier or customer
- Abusing a powerful market position
- Demanding a reseller maintain a particular price or take a particular combination of products
- Setting prices artificially low to drive a competitor out of the market

If an employee from a competing company attempts to discuss these topics with you, don’t allow it. Walk away, end the conversation or do whatever else you can to make it clear that you do not want to cooperate. You should then report the matter to the legal department immediately.

Competition laws vary from country to country, but one thing remains the same: violations of competition laws carry serious consequences. Outside of John Deere Financial’s normal business operations, if you obtain any information marked “company confidential” from another company, or have any questions or concerns, contact the legal department immediately.

Q: I recently traveled to another country. I brought a couple of parts with me in my carry-on. I didn’t declare these items, but they were in my possession the entire flight. Is there something I should have done differently?

A: Yes. You should have declared the John Deere items in your luggage, or depending on the country, not put them in your luggage at all. The products you bring with you on your trip are subject to export and import controls. That includes any parts, tools or merchandise you bring along with you. It can also include technology, software, schematics, product manuals and even laptops containing confidential John Deere information. When you travel, it’s important to know the trade laws that apply. Some products might also be considered hazardous goods and subject to other rules and restrictions. Prior to traveling with anything mentioned above, check the Global Export Controls Policy on the Global Policy Index and contact the company export controls representative on Code Resource Contact List.
How We Manage Our Brand and Reputation

We have earned a reputation for our commitment to doing business the right way, living by our core values and our brand promise. We each have a responsibility to protect and strengthen that reputation to ensure our future success.

Renee Mailhot, Vice President and Chief Compliance Officer

Protecting our brand

The John Deere name is one of the most respected brands in the world and one of our most valuable company assets. All of us share the responsibility to protect and preserve the John Deere brand, just as we would any other significant asset.

Our brand is also a promise to serve our customers and a growing world in ways aligned with our core values. It sets us apart from our competition and helps us earn a strong position in markets where we do business.

We maintain guidelines, standards, and tools that help us protect and preserve the brand. This includes following a process for the purchase of promotional products which use the John Deere trademark. For more information and to learn about our brand promise and policies, visit the John Deere Brand Portal.

Aligning public communication

The way we communicate with the public is important. It sets the tone for our business and is essential to maintaining a positive reputation. Therefore, communication concerning our business must be honest, accurate and consistent.

We maintain a global policy to guide communication that could occur with news media or analysts, in social media and in response to supplier requests.

Publicly communicating company information is the responsibility of senior management and those whom they designate. Only those specifically authorized to speak on behalf of John Deere may do so.

In line with our global policy, we must ensure any information we plan to share externally is already public or that we have approval to share it publicly. We must protect non-public information from being shared with the news media, in social media, in other forms of public communication and in any setting that could result in news media or public dissemination.

In addition, we must ensure that all requests from suppliers to communicate about their relationship with John Deere are managed in accordance with the policy.
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Q: I read an unfavorable article online about one of John Deere’s competitors and decided to repost it on a couple of the social networking sites I use. The article sparked some conversation, and I took the opportunity to make comments about John Deere and our products. Is this okay for me to do?

A: That depends heavily on the kinds of comments you made. For example, sharing publicly available information through social media is acceptable, but making disparaging or untrue remarks about our competitors is not. If you clearly represent yourself as a John Deere employee, and acknowledge that your opinions are your own and not those of the company, you may make tactful, appropriate statements. You should never reveal information that is confidential or sensitive in nature, and should always remain professional in your communications. When in doubt, don’t make a comment.

How We Manage Our Brand and Reputation

If you are communicating publicly on behalf of John Deere, make sure that the information you present does not disclose confidential company information. Section 9 of this Code provides more information about the treatment of confidential information, including examples. If your public communication involves a formal presentation or paper, you must submit the materials for management review and approval to ensure accuracy and consistency.

Key considerations for public communication are outlined below.

Responding to media and public inquiries
- If you receive an inquiry from the news media, forward it to Public Relations
- If you receive an inquiry from an investor, direct it to Investor Relations
- Forward other public inquiries to Corporate Communications

Using social media responsibly
- Authorization in accordance with the Public Communication Policy is required to use social media to conduct company business
- If you can be identified as a John Deere employee when using social media, you should act with integrity and consistent with company policies
- If John Deere is a subject of the content you post online, be clear and open about the fact that you are an employee

Responding to supplier communication requests
- Consider details about our relationships with suppliers to be proprietary information
- You should not negotiate the use of any company trademarks or trade dress for discounts in contracts
- You should not provide endorsements on behalf of John Deere for other company’s products and services unless explicitly authorized
- All supplier communications that reference a relationship with John Deere or any subset of the company must be explicitly authorized according to the process in the Supplier Communications Appendix to the Public Communications Policy

For more information on handling public communication, please see the following policy found on the Global Policy Index:

- Public Communications Policy
Managing our records
Creating and maintaining accurate records is another way we demonstrate our integrity. Records may include inventory data, employment documentation, email or other correspondence, whether in paper or electronic format. We will maintain and dispose of records according to our company’s records management policies, legal holds and applicable laws. A legal hold is a directive issued by our legal department to keep certain records related to a matter that might be in litigation or under investigation.

Keeping accurate records
We comply with generally accepted accounting principles when creating and maintaining our financial records. The laws and regulations that govern our financial records require us to:

– Keep accurate records, including supporting documentation
– Maintain a system of internal controls
– Ensure that all transactions are reported in a timely manner
– Appropriately record all assets
– Not make false, artificial or misleading entries in our books and records

In some cases, we are required to disclose financial or other company information. We will follow our processes and procedures to ensure that the information we share is complete and accurate.

For more information on record keeping, please see the following policy on the Global Policy Index:

– Records Management Policy
Identifying and protecting confidential information

While doing work for John Deere, we may have access to confidential information. In general, confidential information is any non-public data that could harm John Deere if disclosed. It includes our trade secrets and certain intellectual property. It also includes information obtained from others that the company is obligated to keep confidential. Some examples of confidential information are as follows:

- Unreleased pricing information
- Non-public financial data
- Technical data and processes
- Equipment and machinery layout and design
- Product costs
- Manufacturing production schedules or volumes
- Budgets
- Sales and marketing strategies
- Distribution channel strategies
- Competitive information
- Customer lists, financial information and certain operational data
- Supplier lists, prices, and design or part prints
- Unreleased product forecasts
- Market share information
- Proprietary software
- Private information about customers or employees
Q: I’m an engineer at John Deere. Recently, I spoke with an engineer from a new company that supplies products to us. He asked me for certain specifications to help him fill an order. I shared with him some information related to our technical processes and design of our manufacturing site. I was later asked by a colleague if I’d verified that the supplier signed a non-disclosure agreement with John Deere before I provided him with information. I didn’t. What should I do now?

A: Immediately contact your manager or a member of the legal department. Hopefully, this supplier has signed an agreement and the information you provided is safe. However, you should always confirm this before divulging what may be confidential information to a third party to prevent any damage to our company’s reputation or the John Deere brand. If it turns out that the supplier has not signed a non-disclosure agreement (NDA), contact Supply Management to ensure a NDA is signed. Depending on the country and the type of information you provided, this also could violate export control laws so you also may need to consult with the legal department.

How We Manage Our Information

Properly managing confidential information is critical to our company’s success. You must adhere to the following rules when handling this information:

- Mark information appropriately so others know how to protect it
- Limit access and sharing to those with a business need to know
- Only look at information that you have a business need to know
- Share information outside the company only when a contract or confidentiality agreement with company-approved terms is in place
- Before sharing non-John Deere information, check to see if there is a contract in place that defines how we can share this information
- Secure and encrypt information according to company policies
- Do not collect or use any competitor’s documents marked with their confidential markings unless agreed to by the competitor and John Deere legal counsel
- Follow company processes for personal electronic device security, software and application downloads, and connecting electronic devices to the company network

Generally, you also should not communicate non-confidential information outside the company. You may, however, communicate this information if it is part of your job responsibility or you have appropriate management approval.

John Deere maintains a number of policies on how to communicate and store information. For more information, please see the Global Policy Index:

- Global Information Classification Policy
- Electronic Resources Policy
- Public Communications Policy
- Photographic Equipment Policy
- Intellectual Property Policies and Procedures
- Records Management Policy
- Computer Security Policies
- EPDP Confidentiality Statement
Managing personal information and privacy

As part of our employment, we provide personal information to John Deere. Customers also provide their personal information to John Deere to get information on products, to register purchases and to apply for financing and other services. Personal information is highly regulated and requires special attention to maintain confidentiality and to meet other regulatory requirements. This is true whether it’s our information or information about our customers and other individuals. Our company is committed to conducting global business in a way that supports and ensures personal privacy.

Complying with the following rules helps us ensure we meet our commitment to privacy:

– Collect, process and use personal information consistent with applicable notice and, where required, consent
– Work with Supply Management and the IT Global Hosting Office to ensure proper contractual terms, conditions and controls are in place before sharing personal data outside the company
– Use only authorized software acquired through an approved company process
– Remove or make personal information anonymous whenever legally required or otherwise appropriate under the circumstances
– Protect against misuse or unauthorized sharing of personal information by following information security policies and procedures
– Immediately report any suspected data security incident to security.deere.com

Personal data subject to European Union (EU) or European Economic Area (EEA) data protection law must be protected by complying with John Deere Binding Corporate Rules, in addition to:

– Register business processes containing EU personal data (or required by law)
– Complete a privacy risk assessment before modifying, acquiring or developing software, products or services
– Direct anyone requesting access to their personal data to www.Deere.com/Privacy

For questions or concerns regarding the handling, potential misuse or unauthorized sharing of personal information, contact Center for Global Business Conduct staff.

For more information on handling personal information, please see the following policies found on the Global Policy Index:

– Binding Corporate Rules
– Global Privacy Policy
– Global Electronic Resources Policy
– Global Unmanned Aircraft Systems Policy
Avoiding insider trading

In the course of our work, we also may become aware of important information about our company or other businesses before the information is shared with the general public. This information is known as material, non-public information.

Material, non-public information comes in various forms. Generally, it is information that a reasonable investor would consider important when making an investment decision, like buying or selling stock or other securities. Some examples of this information include:

- Earnings and earnings forecasts not yet released
- Significant changes in earnings patterns
- Merger or acquisition discussions
- Dramatic new product developments
- Other significant events that could impact the company's stock price

We may not disclose or use for our personal benefit any material, non-public or "inside" information we possess. Trading on material, non-public information is a violation of insider trading laws that subjects individuals involved and our company to legal risks. This can result in severe sanctions, fines and civil and criminal penalties. It is also illegal to provide inside information to others, or "tip" them, in making their investment decisions.

We should not discuss such information with anyone outside our company, including family members, unless approved by the legal department. This includes avoiding discussions in internet chat rooms, blogs or other social media settings in which our company stock is likely to be discussed.

For more information on inside information, please see the following policy on the Global Policy Index:

- Insider Trading Policy
Protecting intellectual property

Our intellectual property is an important asset and we take great care to secure it. Intellectual property includes patents, trademarks, copyrights and trade secrets. It also refers to any technical data and software developed by or for John Deere. John Deere is entitled to any intellectual property we create in relation to John Deere’s business.

We all have a role in protecting our company’s intellectual property. We take great care to secure our company’s intellectual property rights to maintain exclusive product features. We will help apply for and obtain or otherwise protect patents, trademarks, copyrights and trade secrets for John Deere.

However, our responsibilities regarding intellectual property don’t end there. We all have a role in respecting the intellectual property rights of others. Our shared role includes following intellectual property guidelines and processes as appropriate for respecting patents, trademarks, copyrights and trade secrets of others, to reduce the risk of infringement.

When we work with others, such as suppliers, we have a duty to ensure through contracts that the ownership of the intellectual property is clear and, where possible, held by John Deere. This applies to product development, production and quality methods, and software development.

For more information on intellectual property, please see the John Deere Brand Portal and the following policies found on the Global Policy Index:

- Intellectual Property Policies and Procedures
- Global Copyright Policy
- Electronic Resources Policy – Open Source Software Usage Appendix
- Supplier Code of Conduct
Conclusion

This Code covers a broad range of subjects that are critical to understanding how our company values interact with our global business. Our circumstances may change, but one thing does not: we are all working together toward a better company and improving the lives of those linked to the land. As our business continues to grow and the competitive landscape changes, we have a responsibility to speak up when something isn’t right. This enables John Deere to identify and address issues that could affect the integrity of our commitments.

Living by our values is critical to our company’s long-term success. Integrity, quality, commitment, and innovation are at the core of our work and of who we are. We all have a personal responsibility to adhere to these values, and to comply with our Code, as well as the policies, procedures and laws that support it. When questions arise, we have various ways to ask for help and support. John Deere does not allow retaliation against us for reporting our concerns. Similarly, we must never tolerate or engage in any retaliatory acts.

Our Code, along with our values, policies and the law, is our guide. It is up to each of us to follow this guidance and put it to good use while working for John Deere – no matter where we are, or whether or not anyone is watching.

To view the John Deere Code of Business Conduct online, go to http://www.johndeere.com/businessconduct