



# DEALER CODE OF CONDUCT



JOHN DEERE

*How We Run*



# Introduction

Since 1837, John Deere has focused on conducting business essential to life for our customers and the communities where we do business. John Deere is guided by its core values of integrity, quality, commitment, and innovation. Our dealers, distributors, and their sub-dealers (collectively, dealers) serve as the face of the John Deere family of brands to our customers. As such, John Deere expects dealers to conduct business ethically and in compliance with all applicable laws. To ensure that dealers conduct business with a high degree of integrity and in a socially and environmentally responsible manner, John Deere expects all dealers to adhere to this Dealer Code of Conduct.

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# Demonstrating Commitment

## **JOHN DEERE EXPECTS DEALERS TO:**

- Incorporate this Dealer Code of Conduct into dealer policies, work, and behaviors
- Comply with all applicable laws and regulations
- Ask questions when unsure
- Report to John Deere unethical behavior or potential conflicts with the Dealer Code of Conduct
- Fully cooperate with John Deere investigations regarding John Deere personnel
- Not retaliate against dealer employees who report potential violations of such dealer policies



# Conduct in the Workplace

## LABOR AND EMPLOYMENT PRACTICES

Provide equal opportunity for all workers and support diversity, equity, and inclusion in their dealerships. Dealers should also prohibit discrimination and harassment 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), or any other class or status protected by applicable country, state/province, or local law, rule, or regulation. Dealers should provide an environment that allows employees to raise concerns without fear of retaliation. In addition, dealers are encouraged to leverage best practices related to employee development, training, and benefits/compensation that drives a culture where every employee can make the greatest impact. Dealers' hiring practices should include verification of workers' legal right to work in the country.

## HEALTH AND SAFETY

Provide workers with a safe and healthy work environment. Dealers should develop and implement processes for worker safety and health to ensure legal and regulatory compliance. Dealers should also take proactive measures that promote worker health and safety, including safety training/education, use of personal protective equipment, and risk identification and mitigation.

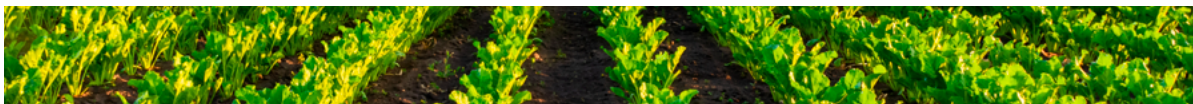
## HUMAN RIGHTS

Comply with applicable child labor laws. In the absence of local law, dealers should not employ workers under the age of 14. Workers under the age of 18 may not perform work likely to jeopardize their health, safety, or education.

Comply with applicable modern slavery and human trafficking laws. Dealers should not use forced, involuntary, or slave labor or purchase materials or services from companies that use forced, involuntary, or slave labor.

## ENVIRONMENT

Conduct their operations in a compliant and sustainable way that minimizes the negative impact on natural resources and protects the environment, customers, and employees. Dealers should develop and implement processes to ensure legal and regulatory compliance with environmental requirements, including those related to air emissions, water discharges, toxic substances, or hazardous waste disposal.





# How We Engage

## ENGAGING WITH OTHERS

- Operate in accordance with the highest standards of ethical conduct
- Treat each customer and prospective customer in a fair, open, and honest manner
- Treat all customers and prospective customers with dignity and respect in all aspects of dealer sales, financing, service, and support processes
  - Do not discriminate against customers or prospective customers on the basis of 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), or any other class or status protected by applicable country, state/ province, or local law, rule, or regulation
- Represent the John Deere family of brands, and advertise John Deere products clearly, accurately, and in a positive, informative manner
- Conduct careful review and consideration of all public relations and social media activity, including any influencer relationships, to protect the dealer and John Deere brand and goodwill
- Resolve customer and prospective customer concerns promptly and courteously



# How We Engage

## BRIBERY AND CORRUPTION

Comply with anti-bribery and anti-corruption laws of all countries where they do business and keep accurate records of expenses and payments to document compliance. Dealers should not seek to obtain an improper business advantage by offering, providing, promising, or accepting anything of value, including gifts, meals, or entertainment. Dealers should not make facilitation payments (*for example, nominal payments to expedite routine, non-discretionary government action*).

## FAIR COMPETITION

Comply with all applicable antitrust and competition laws and regulations. Dealers should not act dishonestly or engage in any unfair or anticompetitive practices. Robust and fair competition practices include:

- Not entering into agreements, coordinated pricing, bidding, or practices with competitors, including other John Deere dealers, that could restrict competition
- Not exchanging competitively sensitive information with competitors (including, pricing, costs, production data, inventory strategies, market data, sales territories, distribution channels, customer lists, or other non-public business information)
- Gathering information about competitors using only ethical and legal means





# How We Engage

## CONFLICTS OF INTEREST

Avoid conflicts of interest whenever possible. Potential conflicts of interest might arise in a number of ways. Some examples may include:

### Business / Governmental Relationships

A potential or actual conflict may arise if there is a close friendship or family relationship with a supplier (including John Deere), government official, customer, or competitor. This relationship may improperly influence an employee's decision making about ongoing or new business opportunities.

### Personal Business or Investment Opportunities

Do not use information learned through employment for personal business or investment opportunities and do not help others to do so.



## GLOBAL TRADE COMPLIANCE

Comply with all applicable laws and regulations, including those of the U.S. and other countries that govern the import, export, re-export, transfer, sale, rental, lease, use, and provision of John Deere goods, services, software, and technology. These laws include, but are not limited to, trade embargoes, economic sanctions, sanctioned and denied party lists, export control regulations, U.S. anti-boycott regulations, import/customs regulations, tax regulations, and cargo security requirements. Dealers shall also provide John Deere, when requested, with information and documentation necessary to ensure John Deere's compliance with these laws.

## FRAUD

John Deere will not tolerate theft, fraud, falsification, embezzlement, or misappropriation of any John Deere or customer asset. These dishonest acts are incompatible with John Deere's values and culture. Dealers must not engage in any such misconduct including, but not limited to:

- Theft of funds or property
- Forging invoices or creating fraudulent claims, reports, or documentation
- Intentionally filing false financial records or statements





# How We Engage

## CONFIDENTIAL INFORMATION, PRIVACY, AND DATA SECURITY

Proper management of confidential and personal information, including intellectual property, is critical to the success of both John Deere and dealers. Dealers must collect and process confidential and personal information in compliance with laws and regulations. This includes implementing appropriate administrative, physical, technical, and organizational measures designed to protect confidential and personal information. Dealers should regularly verify, evaluate, and assess the effectiveness of the administrative, physical, technical, and organizational measures implemented.

Dealers are trusted with confidential and personal information from our customers and other stakeholders. Dealers should act ethically and responsibly when handling personal information. This includes being transparent when collecting and processing personal information and appropriately safeguarding personal information from unauthorized access, use, transfer, or loss.

## REPORTING CONFLICTS WITH THE DEALER CODE OF CONDUCT

Dealer employees are expected to work through internal questions and issues within their dealership organization. However, behavior that conflicts with the John Deere Dealer Code of Conduct or unethical behavior by a John Deere employee may be reported confidentially to a John Deere manager or through the John Deere Compliance Hotline available online at <https://johndeere.ethicspoint.com>. Local country phone numbers can also be found by visiting the Hotline website. Anonymous reporting is available where allowed by law. The John Deere Compliance Hotline is available 24 hours a day, seven days a week.



**Dealers may direct questions or comments about this Dealer Code of Conduct to their John Deere field team.**

(UPDATED OCTOBER 2023)