

## Business Conduct and Ethics

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*Policy No. CP-1-4*

*Effective Date: 9/1/16*

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### PURPOSE

To affirm the strong dedication of Gulfstream Aerospace Corporation ("Gulfstream") that its affairs be conducted in accordance with the highest standards of integrity in the United States and every other country where Gulfstream conducts business. This policy is intended to provide an overview of expected conduct by each employee and to state the policies of Gulfstream concerning its ethical values, principles and legal standards of conduct in daily business activities, and to provide guidelines intended to avoid any unlawful conduct and prevent any conflict of interest or the appearance of a conflict of interest.

### POLICY

We will conduct business in accordance with federal, state and local laws and regulations and with the laws of other countries in which Gulfstream operates. In the course of conducting company business, integrity must underlie all stakeholder relationships, including those relationships with our customers, suppliers, employees and communities. Gulfstream will procure and provide goods and services on the basis of price, quality, schedule and compatibility with the needs and requirements of the company, not on the basis of personal relationships, friendships, favors, or other obligations. Gulfstream employees and representatives must avoid any activity or behavior that places the company's honesty, integrity or reputation in question or at risk. This policy also requires adherence to the principles published in the General Dynamics "Standards of Business Ethics and Conduct" (the "*Blue Book*").

#### A. Improper Payments

Employees and representatives of Gulfstream are prohibited from soliciting, accepting, offering, giving, negotiating or receiving bribes, kickbacks and other improper payments for themselves or other individuals or entities. No employee may enter into any arrangement to make a payment of any type, including commissions, rebates, consulting or service agreements, bribes and kickbacks, when the employee knows, or should suspect from the surrounding circumstances, that the intent or probable result is to improperly influence the recipient to make decisions or take action favorable to Gulfstream that may violate the recipient's fiduciary duty.

The Gulfstream Legal department may also determine whether disclosure of the payment arrangement would eliminate the impropriety of the payment arrangement. If there are any questions regarding proposed payment arrangements, contact the Gulfstream Legal department.

#### B. Gifts, Gratuities, and Entertainment -- COMMERCIAL ACTIVITY

##### 1. Business Gifts Given by Gulfstream

Gulfstream competes solely on the merits of our products and services. Gulfstream does not attempt to influence a customer's decision to purchase from Gulfstream by offering gifts, meals, entertainment or any item of value. This policy does not address every possible situation involving gifts, gratuities or entertainment. It is important to consider the facts, circumstances and context of each situation on a case-by-case basis. Any situations not addressed by the guidance provided in this policy or referenced materials should be carefully evaluated by consultation with the Gulfstream Ethics Officer who will consult with the Legal Department as necessary.

## **GULFSTREAM AEROSPACE CORPORATION CORPORATE POLICY MANUAL**

A gift, or payment of business entertainment expenses, of whatever value, can represent prohibited conduct if provided with corrupt intent to obtain or retain business, and not merely as an unconditional gift with the generalized hope that a favorable business climate will exist. Providing gifts intended as a quid pro quo, and providing frequent gifts to an official in exchange for a pattern of official actions benefiting the donor, would constitute corrupt intent.

Gifts containing the Gulfstream logo procured through Gulfstream-authorized sources or commemorating a company-related event are always acceptable (See also Section C below). Any other gift must be approved in advance by a Senior Vice President and comply with the following guidelines:

- a) The gift should be provided as a courtesy or token of regard or esteem, or in return for hospitality.
- b) A gift of cash, cash equivalents or investment interests, is prohibited.
- c) The gift should be permitted under the local laws of the foreign country and the policies and guidelines of the recipient's employer.
- d) The gift should be of a type or value that is unequivocally customary in the foreign country and appropriate for the occasion.
- e) The gift could not cause embarrassment to, or reflect negatively upon the reputation of, Gulfstream, the recipient, or the current or prospective customer.
- f) The gift should be of "nominal value," generally not to exceed \$250.
- g) The purchase of any gift item should be properly and accurately recorded as a "Promotional Expense - Material" or under "Marketing Programs" or "Trade Shows" if appropriate, on the company's accounting books and records, including initial check or reimbursement requests.
- h) Gifts given solely because of a pre-existing personal friendship or familial relationship and paid for with personal, not Company, funds, are not prohibited provided they do not create an actual or perceived conflict of interest.

### **2. Business Entertainment Expenditures by Gulfstream**

As with gifts, business entertainment expenditures provided as a quid pro quo to persuade the recipient to favor giving business to Gulfstream are prohibited. Business entertainment expenditures should be reasonable and made only to create a positive business environment with the customer, with only a generalized hope or expectation of ultimate benefit to Gulfstream.

Gulfstream employees should observe the following guidelines with respect to entertainment expenses:

- a) Reasonable and bona fide business entertainment during an official business trip would be appropriate.
- b) The business entertainment expenditure should be unequivocally reasonable.
- c) The expenditure should be permitted under local law and customer regulations and guidelines.
- d) The business entertainment expenditure should be commensurate with local custom and practice.
- e) The business entertainment expenditure should avoid even the appearance of impropriety.
- f) The entertainment expenditure should be properly and accurately recorded pursuant to the Company's CP-2-26 "*Gulfstream Global Travel and Entertainment Policy*".

### **3. Gifts to and Entertainment of Gulfstream Employees**

Employees and their immediate families shall not accept or solicit any gift or entertainment from any person or organization that does, or may seek to do, business with Gulfstream if that gift or entertainment could influence or appear to influence the employee in the performance of Gulfstream duties.

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Gifts from others to Gulfstream employees should not exceed a value of fifty dollars (\$50) at one time or two hundred and fifty dollars (\$250) in a calendar year. Gifts in excess of this value should be reported to the Ethics Officer to determine proper handling.

Notwithstanding the above, entertainment that does not fall in the nominal or inconsequential category may be accepted by a Gulfstream employee if these actions may be reciprocated by the employee using company funds. If the employee does not have the authority to reciprocate the entertainment using company funds, the employee may not accept it.

Notwithstanding any other provisions in this policy, no Gulfstream employee may accept a gift of cash or cash equivalents, including compensation, honoraria, funds, checks, gift certificates, or any other monetary instruments or investment interests, in any form or amount, from a current or prospective customer, subcontractor, supplier or vendor. Gifts received solely because of a pre-existing personal friendship or familial relationship and paid for with personal, not Company, funds, are not subject to this prohibition, provided that they do not create an actual or perceived conflict of interest.

In certain circumstances, where the refusal to accept a substantial gift may be impossible without injuring the legitimate business interests of Gulfstream, such gifts may be accepted, provided the gift inures to the benefit of Gulfstream and not the receiving employee. Acceptance and treatment of substantial gifts should be coordinated with the Legal Department.

#### **4. Gifts of Private Air Travel to Gulfstream Employees**

Gulfstream employees may from time to time be offered air transportation on aircraft owned or operated by customers or suppliers of Gulfstream. The following rules apply in this situation.

- a) Air travel for personal use (such as for vacations, family travel or the like) is prohibited.
- b) Air travel during a legitimate business trip, where the customer's aircraft is making the trip anyway, and the Gulfstream employee is merely offered the opportunity to ride along, is permitted with the prior written (email is acceptable) permission of the employee's immediate supervisor, so long as the opportunity does not increase the Company's travel expense.
- c) Air travel for a legitimate business purpose, where the aircraft is dispatched solely for the Gulfstream employee, may not be accepted as a gift and may only be accepted under one of the following two circumstances.
  - 1) It may be accepted only if the aircraft operator bills Gulfstream for the trip, and with the prior permission of the employee's Leadership Team member.
  - 2) Employees dispatched to assist a customer with an AOG situation may accept the customer's offer of speedier transportation both to and from the AOG service visit with the approval of the Manager, Technical Operations, or the AOG Duty Manager, and should be documented on the AOG work order.
- d) Air travel that is part of the employee's job duties, such as flight crew and maintenance personnel participation in maintenance check flights or entry-into-service operations, is not in the nature of a gift and is always permitted.

#### **C. Gifts, Gratuities, and Entertainment -- GOVERNMENT SALES AND SERVICE ACTIVITY**

In addition to the preceding guidance on Gifts, Gratuities and Entertainment in the context of the Company's commercial customers, other limitations apply to Gulfstream's dealings with government agencies and government employees, both domestic and foreign. Employees who transact business with any governmental agency should familiarize themselves with this section.

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CORPORATE POLICY MANUAL**

In addition to the policy set out below, the General Dynamics "Standards of Business Ethics and Conduct" (the "*Blue Book*") and General Dynamics' Corporate Policy (CP-02-101) *Gifts and Hospitality* both provide further specific guidance for the ethical practices expected of Gulfstream employees when dealing with US government or foreign government officials, and are adopted herein by reference. Gulfstream employees who interact directly with such government officials should familiarize themselves with such policies, and direct any questions or concerns they may have to Gulfstream's Ethics Officer, Gulfstream Anti-Bribery Compliance Officer or Gulfstream's Legal Department.

**1. US GOVERNMENT ACTIVITY:**

NASA and DOD regulations prohibit, among other things, entertainment by a contractor, even business lunches. Not all agencies are as restrictive though; so if you have dealings with other U.S. Government agencies (such as the FAA), you should become familiar with the regulations of such agencies and should conduct yourself accordingly. The Anti-Bribery Compliance Officer may be contacted for additional guidance. Gulfstream employees dealing with the US Government are specifically directed to General Dynamics' Corporate Policy (CP-02-101) *Gifts and Hospitality* and are required to comply with it in all aspects when dealing with the US Government. If issues of guidance or reporting are required under either this Gulfstream policy or the General Dynamics' Corporate Policy, Gulfstream employees may contact either the Gulfstream Ethics Officer or the General Dynamics' Corporate Ethics Officer.

**IN ADDITION TO THE ABOVE, EFFECTIVE 2008, THE FOLLOWING RESTRICTIONS APPLY SPECIFICALLY TO CONGRESSIONAL REPRESENTATIVE (U.S. SENATORS, U.S. REPRESENTATIVES, OFFICERS AND EMPLOYEES OF CONGRESS).**

- 1) Travel: May not be provided with reimbursement for travel or transportation of any kind. The only exception is that company vehicles can be used for ground transportation within the boundaries of company property.
- 2) Lodging: May not be provided with or reimbursed for lodging or hotel accommodations.
- 3) Meals/Food: May be provided with beverages or snacks only if they are nominal in value and are not offered as part of a meal. No meals may be provided. (Box lunches and pizza are viewed as a "meal").
- 4) Entertainment: Tickets to sporting events, shows, or other entertainment cannot be provided to any Congressional representative.
- 5) Gifts or other Items: The only gifts or other items that can be provided to Congressional representatives are as follows:
  - (a) Greeting cards, baseball caps, or T-shirts valued at no more than \$15.00
  - (b) Other items of nominal value of not more than \$10.00
  - (c) Informational material sent to a congressional office in the form of a book, article, periodical, audiotape, videotape, or other form of communication (gift subscriptions are NOT permitted)
  - (d) A plaque, trophy, or other item that is given as part of an in-person presentation and is substantially commemorative in nature (i.e., inscribed with the name and date of the event, etc.)

Except as outlined above no gratuity, favor, discount, hospitality, loan, loan forgiveness, or any other item of value may be provided to any congressional representative without documented approval by: the responsible business unit President, the Vice President of Government Relations and Communications and the General Counsel of General Dynamics. In addition, Law department guidance must be sought prior to reliance on exceptions (c) or (d) above, as they are subject to interpretation by the responsible House and Senate committees.

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### **2. FOREIGN GOVERNMENT ACTIVITY:**

Business conduct in foreign countries sometimes differs from that in the U.S., both in terms of common practice and legality. The simple overriding consideration is that if any unethical or illegal activity is necessary to obtain or retain any business, Gulfstream will not pursue or seek to retain that business.

Gulfstream will observe the laws of foreign countries in which it operates concerning payment of agents' fees and commissions, provided these laws are not in conflict with U.S. law. Employees and agents of Gulfstream are not to engage in activities designed to circumvent foreign laws concerning retaining or paying sales representatives and consultants.

Individuals who have international responsibilities must become familiar with the Foreign Corrupt Practices Act, a US law (the "FCPA"), together with international anti bribery legislation enacted in accordance with Organization for Economic Cooperation and Development "Convention on Combating Bribery of Foreign Public Officials in International Business Transactions" (the "OECD Convention"), which imposes criminal and civil sanctions on Gulfstream (and its employees who violate such laws) if it makes direct or indirect payments to any foreign government official to influence his/her actions or decisions or to induce him/her to use his/her influence to help Gulfstream. Anyone who willfully violates the FCPA or laws in various foreign countries adopted pursuant to the OECD Convention, may be fined and/or imprisoned in such countries. A copy of the FCPA or the OECD Convention and help in understanding them are available in the Gulfstream Legal department, which is the Anti-Bribery Compliance Office for Gulfstream.

Consistent with the FCPA and the OECD Convention, it is strictly prohibited for any Gulfstream employee to offer, pay, promise to pay, or authorize the payment of money or anything of value to any foreign government official for the purpose influencing any act or decision of such government official or securing any improper advantage in order to assist in obtaining or retaining business. A foreign official is any individual, regardless of rank or position, who is:

1. an officer or employee of a:
  - a. government department or agency
  - b. state-owned or state-controlled enterprise
  - c. public international organization
2. a non-U.S. political party, party official, or candidate, or
3. any person acting in an official capacity for or on behalf of any of the above, e.g., consultant for a non-U.S. government.

Cash advances to government customers, even when to support the operation of the aircraft being sold or serviced, or the purchase of items not related to the aircraft sold or serviced by Gulfstream, can lead to the appearance of impropriety under various laws, including the FCPA and the OECD Convention. Cash advances to government customers or the purchase of non-aviation items by Gulfstream for the benefit of government customers are prohibited unless the Anti-Bribery Compliance Officer grants a written exception.

#### Reimbursement of Expenses of Foreign Government Officials (FGO's)

In addition to the Foreign Government Sales activity addressed above, Gulfstream also frequently engages foreign government agencies for licensing issues (including Repair Station Licenses) and the like, and is required by the respective government agencies to reimburse expenses incurred by the government during the activity. Reimbursement of FGO's legitimate expenses should not be paid directly to foreign government officials. Instead, Gulfstream should direct payments to the relevant foreign government agency to reimburse it for the FGO's expenses. Gulfstream will secure and follow the written instructions of the foreign government agency.

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Similarly, a cash per diem should not be paid by Gulfstream directly to foreign government officials.

Notwithstanding the above, an advance or reimbursement of legitimate expenses incurred during the performance of an approved activity may be made by check directly to a foreign government official only if requested in writing by the foreign government agency, approved in writing by Gulfstream's Anti-Bribery Compliance Officer following a review of the pertinent factors, and a copy of such written requests and approval submitted and maintained with the payment request.

Making any Facilitating Payment as defined by the FCPA (also referred to as "Grease Payment") is prohibited unless prior approval has been received from the Anti-Bribery Compliance Officer.

### **3. GIFT AND ENTERTAINMENT LOG – FOREIGN AND DOMESTIC GOVERNMENT OFFICIALS**

In addition to the complying with all of the foregoing requirements of this Section C, Company employees who provide gifts, entertainment or business meals (other than Minor Gifts or Minor Business Meals, as defined below) to government employees are also required to promptly create and submit either via Concur or by email a detailed "Gift Log" (a version of which is at Attachment 1) of such activities to the Company's Ethics Officer. Meals provided to Congressional Representatives are generally prohibited with a few minor exceptions and must be reported on a Gift Log in all cases.

"Minor Gifts" are company logo items secured from the Company Store or the Company Sales Premiums Website if their cost to the Company is less than \$35.00 per item. (\$10.00 per item when provided to Congressional Representatives). Meals provided to Congressional Representatives are generally prohibited with a few minor exceptions, and are not included in the definition of Minor Meals.

"Minor Business Meals" are modest affairs, not involving entertainment, designed for the purposes of providing nourishment only, and the value of which is less than \$50 per person at such meal.

In addition to the requirement to report gifts, business meals and entertainment given to government employees on the Gift Log, employees giving gifts whose cost to Gulfstream is in excess of \$250.00 per person (or a cumulative amount per person in excess of \$500.00 in a given calendar year) shall secure written pre-approval for such gift giving from either Gulfstream's Ethics Officer or Gulfstream's Anti-Bribery Compliance Officer and document such approval on the Gift Log. On a quarterly basis the Ethics Officer shall review the company's gift logs to confirm compliance with these provisions.

#### **D. Protecting Information**

The protection and proper use of information in our possession is fundamental to Gulfstream's ability to carry out our business so that our investors, customers, subcontractors and business associates have confidence in the integrity of Gulfstream. Business, financial and technical information is valuable to us and must be protected from loss, theft, inadvertent disclosure or misuse. Such information may be categorized as classified, proprietary/inside private, or employee information.

Employees shall not engage in any business or professional activity that might reasonably require or induce them to disclose proprietary information acquired by them through their positions. Each employee has a continuing obligation, after separating from Gulfstream, not to disclose any Gulfstream proprietary/inside private information. Similarly, Gulfstream shall not solicit from a new employee information to which Gulfstream is not properly entitled.

In the case of classified information, we must operate in accordance with clearly established laws and regulations. Protecting such information requires not only the proper handling of documents (hard copy and electronic versions) but also restricting the disclosure of their contents only to individuals with a proper security or export clearance and a need-to-know status. Employees involved in dealings or potential dealings with foreign persons or entities, whether inside or outside the U.S., must consult in advance with the designated Export Control Coordinator (reference Export Regulations, International Traffic in Arms Regulation and the Bureau of Export Administration Regulations). The Security and Export/Import Compliance departments can provide details and guidance.

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Employees may not purchase or sell securities of General Dynamics, suppliers, customers or other companies with which Gulfstream has business or contractual relationships using insider information that is not available to the public. Employees are also prohibited from communicating insider information to others who might use it for trading securities in violation of law. Employees must preserve the confidentiality of such information by taking appropriate steps to protect against its inadvertent disclosure.

Proprietary/inside private information is information that, if made available to unauthorized persons, competitors, or to limited groups with resulting illegal use, could have an adverse legal, commercial, financial or securities-related impact on Gulfstream, its investors or its employees. In addition, Gulfstream and its employees must comply with all financial disclosure procedures and controls as set forth in General Dynamics Corporate Policy 08-101. A complete copy of the policy is available on Gulfstream's Intranet.

### **E. Conflict of Interest**

A conflict of interest is defined as a conflict between the private interests and the official responsibilities of a person in a position of trust. We should all consider ourselves as persons in a position of trust and conduct ourselves accordingly. A conflict of interest exists when an employee is in a position to influence a Gulfstream decision that may result in a personal gain for that employee. A conflict exists even if the benefit goes directly to a relative or friend instead of the employee and even if Gulfstream is not adversely affected by the action. Employees must be free from the influence of personal or financial interests when they represent Gulfstream in any business dealings or make any recommendations that may influence an action of Gulfstream. Employees are expected to avoid direct or indirect involvement in any situation in which they may have a conflict, real or apparent, with Gulfstream's business, including competing with Gulfstream or taking for themselves an opportunity that belongs to Gulfstream.

Employees specifically shall not participate in any Gulfstream dealings with any entity of which they are officers, agents, members or employees or in which they own a controlling interest. Employees may not serve on outside Boards of Directors, except local charities, not-for-profit organizations and family businesses, without the President's approval. Employees shall not accept outside employment that might impair their independence of judgment on behalf of Gulfstream or that might adversely affect Gulfstream's interests. Intellectual property developed during Gulfstream time, with Gulfstream resources or pertaining to Gulfstream business belongs exclusively to Gulfstream.

Revolving door laws and regulations pertaining to former government employees and former military personnel impose specific conflict-of-interest restrictions on the duties they may perform for the company. Gulfstream will honor those requirements. Prior to hiring or retaining former government officials or military personnel in positions related to their former responsibilities, the Ethics Officer and General Counsel must be consulted.

Employees who have or had any kind of financial or personal interest in an organization with which Gulfstream may do business or against which Gulfstream may compete must disclose the nature of such financial or personal interest. (See **Communication/Acknowledgement/Disclosure** Section below.)

### **F. Political Activities**

Neither Gulfstream nor any of its subsidiaries will make contributions to any U.S. federal or any foreign political candidate or party through any means, directly or indirectly. State and local contributions that are not prohibited by law may be made only with the approval of the Senior Vice President, Administration and General Counsel and of General Dynamics in accordance with its applicable policies and must be paid through the Gulfstream Corporate Accounting department in Savannah. Gulfstream encourages employees to participate individually in political activities with their own time and resources.

## **GULFSTREAM AEROSPACE CORPORATION CORPORATE POLICY MANUAL**

### **G. Antitrust**

In dealing with actual or potential competitors, Gulfstream must be careful not to take any action or enter into any discussion that might be interpreted as an effort to fix prices or otherwise restrain full competitive trade. Bid rigging, price fixing, defective pricing schemes, customer and supplier boycotting, allocating markets and limiting the sale of our product are attempts to restrict market conditions and are forbidden.

Gulfstream is committed to fair and competitive sales practices. Gulfstream will not engage in practices that would unfairly limit trade or exclude competitors from the marketplace. Employees must not communicate formally or informally with competitors to fix or control prices, allocate markets, boycott customers or suppliers or limit the sale of our products. Employees must not make false statements regarding our competition, nor improperly gain their proprietary information.

### **H. Record Keeping**

All company records and documents, including invoices, must be accurate and truthful, updated as appropriate and maintained in accordance with record-retention procedures. False or misleading records or documents are strictly prohibited. Gulfstream books, records and accounts must be maintained in conformity with generally accepted accounting principles and the standards established by the Foreign Corrupt Practices Act to provide an accurate and auditable record of all financial transactions. Requests for the production of bogus records of any kind must be immediately reported to the Company's Chief Financial Officer and Anti-Bribery Compliance Officer.

Each employee is responsible for safeguarding Gulfstream assets under his/her control and for maintaining an auditable record of financial transactions.

Everyone must take great care to personally ensure that labor and other costs are properly recorded and charged to appropriate accounts, regardless of the status of the budget for those accounts. Falsifying time cards, time reports, expense reports or other cost records will not be tolerated. Every manager is responsible for ensuring that work-time and expenses of employees are recorded accurately and promptly.

### **I. USA PATRIOT Act**

Gulfstream will fully comply with the USA PATRIOT Act, adopted by the U.S. Congress in 2001. Under this Act, Gulfstream is required to confirm that the Company does not sell aircraft to any individual whose name appears on various terrorist and other "watch lists" maintained by the U.S. Government, and that the Company actively preclude and identify unlawful money laundering. Gulfstream has adopted a specific USA PATRIOT Act compliance program, which provides for training of selected employees. Gulfstream has appointed the General Counsel's office as Compliance Officer for this program as an adjunct to its Anti-Bribery Compliance Program.

### **Communication**

- All employees will be issued a copy of the *Blue Book* and new employees will be introduced to the Ethics Hotline during initial orientation.
- All employees are charged with compliance with this policy. Certain employees in sales, sales support and finance positions will be further trained on particular aspects of this policy and be required to certify compliance.
- Information regarding the Company's Ethics program are contained on the company Intranet, bulletin boards and in Ethics Awareness Centers throughout the facilities.

# GULFSTREAM AEROSPACE CORPORATION

## CORPORATE POLICY MANUAL

### Reporting Procedures

- The company maintains an “Open Door” philosophy to provide all employees an open channel for confidential communication with management at all levels when following the traditional chain of command is impractical or uncomfortable.
- Any employee who believes that there may be a violation of Sections A, B, D, H or I should immediately disclose the issue to the General Counsel's office.
- Employees may also contact the Ethics Officer or Local Ethics Officers (LEOs) assigned to each facility to report suspected cases of misconduct to seek advice on conducting their business properly.
- The company provides an Ethics Hotline telephone reporting system 24 hours per day, 7 days per week, to accept confidential and anonymous reports and inquiries.
- Gulfstream has a structured resolution process in effect (*Dispute Resolution*, CP-6-56) for use in employment-related disputes.

### Enforcement

- Gulfstream promptly and effectively investigates allegations of misconduct.
- Behavior found to be inconsistent with expectations will be addressed either through training, counseling, formal disciplinary action, up to and including termination, or legal prosecution as appropriate.
- The Ethics Officer, or designee, is responsible for oversight of the investigative process and for ensuring an appropriate resolution of each allegation of misconduct.

### Applicants for Employment

- Job applications must contain a statement attesting to the applicant's willingness to abide by Gulfstream's policies and procedures.

## RESPONSIBILITY

### Management

- Support the implementation of Ethics and Business Conduct Programs
- Lead by setting the example of appropriate behavior and creating an environment where proper ethical conduct is the expected behavior
- Affirm the need to follow the laws, regulations and policies that control Gulfstream's business
- Create an open and honest environment in which employees feel comfortable bringing issues forward and asking for advice
- Implement control measures to detect and mitigate compliance risks
- Take prompt action to correct problems
- Ensure that employees who raise legitimate concerns are protected from retaliation
- Ensure all employees have been advised of and understand the principles set forth in these standards
- Ensure compliance with these standards
- Avoid placing or appearing to place subordinates under undue pressure that might cause them to deviate from standards of acceptable conduct
- Be accountable for their actions and for the actions of those under their direction

## **GULFSTREAM AEROSPACE CORPORATION CORPORATE POLICY MANUAL**

### **Human Resources**

- Ensures new employees receive a copy of the *Blue Book*, acknowledge receipt as a condition of employment and are instructed on how to use the Ethics Hotline
- Provides assistance as needed regarding the use and interpretation of policies and the *Blue Book*

### **Employees**

- Use available resources for guidance and assistance to understand policies which impact their work assignment and ask questions when unsure of appropriate conduct
- Report suspected violations of laws, regulations or policies
- Cooperate with any internal investigations about a reported ethics or compliance matter as a condition of continued employment

### **Purchasing**

- Ensures that consulting contracts contain a clause committing the prospective consultant to abide by Gulfstream's policies and procedures when representing Gulfstream
- Encourage suppliers to support the principles and values outlined in the *Blue Book* in their business relationship with Gulfstream

### **Gulfstream Ethics Officer**

- Is appointed by General Counsel with the concurrence of the General Dynamics Ethics Officer
- Reports to the Vice President of Employee Relations and to the General Dynamics Ethics Director when acting in the capacity of the Ethics Officer
- Has dotted line reporting to the President of Gulfstream
- Has the authority to report findings and allegations of misconduct directly to General Dynamics if deemed necessary

## **COMMUNICATION / ACKNOWLEDGEMENT / DISCLOSURE**

This policy will be communicated and the *Blue Book* will be distributed to all Gulfstream employees. New employees will sign the Business Conduct Policy Declaration Form GA 2069 as a part of employee orientation. Human Resources will communicate any disclosed items to the employee's supervisor, who then has the responsibility to review the disclosure and determine if there is a conflict of interest or if a corrective action needs to be taken. Documentation of the review and determination must be included in the employee file. The Gulfstream Legal department and/or Ethics Officer may be contacted for assistance. Failure to comply with the foregoing policy may result in corrective/disciplinary action up to and including termination, depending on management discretion.

Addendum I (Business Conduct Policy Declaration – GA 2069) may be obtained through the Forms Vault.

Addendum 2 (Gift and Entertainment Log – U.S. and Foreign Government Officials – GA 3834) may be obtained through the Forms Vault

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**REFERENCES**

- CP-2-26** Gulfstream Global Travel and Entertainment Policy
- CP-6-5** Equal Employment Opportunity and Affirmative Action Plans
- CP-6-56** Dispute Resolution
- CP-6-62** Acceptable Workplace Conduct and Harassment Prevention
- CP-8-4** USA PATRIOT Act Compliance
- CP-8-6** International Consultants and Sales Representatives
- CP-8-7** International Trade Compliance

GD CP 02-101 Gifts and Hospitality

GD CP 05-100 International Consultants and Sales Representatives Agreements

GD CP 05-102 Compliance with U.S. and International Anti-Bribery Laws

General Dynamics "Standards of Business Ethics and Conduct" (the "*Blue Book*")

**Issuing Organization: Corporate**

**Ira Berman**  
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**Approved by**

**GULFSTREAM AEROSPACE CORPORATION  
CORPORATE POLICY MANUAL**

**Figure 1. Addendum I. Business Conduct and Ethics Policy**

**GULFSTREAM AEROSPACE CORPORATION  
BUSINESS CONDUCT AND ETHICS POLICY DECLARATION**

I have reviewed Corporate Policy 1-4, "Business Conduct and Ethics" and the "Blue Book" and agree to abide by its requirements while employed or otherwise affiliated with Gulfstream Aerospace Corporation.

I understand that certain financial and personal relationships that I have may require disclosure under this policy and that management will determine whether any real or potential conflict resulting from that relationship is acceptable given my responsibilities with Gulfstream. I report the below items relating to me or any member of my immediate family that are required to be disclosed based on the policy, including but not limited to the following:

- Financial interest, including equity investments or loans in any concern doing business with or competing against Gulfstream. (Stock ownership of less than 5% of any publicly owned corporation need not be reported. Loans with a financial institution with which Gulfstream does business need not be reported.)

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- Service as officer, agent, member or employee of any concern doing business with or competing against Gulfstream.

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- Service on the Board of Directors for any organization, except not-for-profit organizations and family businesses.

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- Other personal or financial interest, including outside employment, that might be a potential conflict of interest.

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I will promptly disclose to senior management any financial or personal interest arising during the year that is required to be disclosed as well as any other actual or potential violation of any section of the Business Conduct and Ethics policy or the *Blue Book*. I will acknowledge compliance with the active version of the policy on an annual basis.

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Employee Number

\_\_\_\_\_  
Date

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Addendum 2 to CP-1-4

**GULFSTREAM GIFT AND ENTERTAINMENT LOG – U.S. AND FOREIGN GOVERNMENT OFFICIALS**

Per Gulfstream CP 1-4(C)(3), this log must be completed for all gifts, meals and entertainment provided to U.S. and Foreign Government Officials other than Minor Gifts (under \$35 per item, except under \$10 for Congressional Personnel) and Minor Business Meals (under \$50.00 per person, but see note below regarding prohibition of meals and entertainment for Congressional Personnel)

Employee Name: \_\_\_\_\_ Employee Telephone No.: \_\_\_\_\_

Date of Event: \_\_\_\_\_ Employee Email Address: \_\_\_\_\_

Date Gift(s) Planned to be Given: \_\_\_\_\_

Current Business with Recipient: \_\_\_\_\_

REF	NAME OF RECIPIENT	TITLE/RANK	GOV'T/GOV'T DEPT. NAME	DESCRIPTION OF GIFT	COST TO GAC	REIMBURSED BY RECIPIENT	QTY
1							
2							
3							
4							
5							
6							

Comments:

\_\_\_\_\_ Promptly email completed Gift Log to Tim Maguire – Ethics Officer, at [tim.maguire@gulfstream.com](mailto:tim.maguire@gulfstream.com)

Employee: \_\_\_\_\_  
Signature \_\_\_\_\_ Date \_\_\_\_\_

Received: \_\_\_\_\_  
Signature \_\_\_\_\_ Date \_\_\_\_\_

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