

# ETHICS & CONDUCT

STANDARDS OF  
**Business Ethics  
And Conduct**

**Fifth Edition**

## **Table of Contents**

**MESSAGE 1**

**BUSINESS ETHICS PRINCIPLES 3**

**BUSINESS ETHICS MODEL 4**

**THIS BOOKLET 5**

**CONDUCTING OUR BUSINESS 7**

**WORKING WITH THE GOVERNMENT 11**

**WORKING WITH OTHERS 13**

**PROTECTING OUR RESOURCES 15**

**TAKING ACTION 17**

**INDEX** Inside back cover

## Message

Dear General Dynamics Employee:

This is the Fifth Edition of the General Dynamics “*Blue Book*” – the name we give to our *Standards of Business Ethics and Conduct* handbook. As you know, much has changed over the past few years. We have grown here and abroad and have expanded in both the defense and commercial sectors. But, while we have experienced many changes, there are some things that do not change. One of these is how we conduct ourselves as a company and as individuals representing our company.

The *Blue Book* lays out the building blocks for our corporate behavior. At core, we are in business to earn a fair return for our shareholders. In doing so, we must use our company’s assets wisely and we must deliver on our promises to our customers, partners, and employees. These are the fundamental business ethics principles that guide our conduct and decisions.

Please read the *Blue Book* carefully. It calls on us to do the right thing for our shareholders, each other, and our country. We have earned an excellent reputation for the way we conduct business. Each of us needs to sustain that reputation by adhering to the principles of integrity, honesty, and respect articulated in this handbook.

Sincerely,



Nicholas D. Chabraja

Chairman and Chief Executive Officer



# Business Ethics Principles

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*We are in business to earn a fair return on behalf of our shareholders*

- **Use Assets Wisely**
  - How we manage assets reflects our personal values, our company's values, and determines our ability to earn a fair return.
- **Offer a Fair Deal**
  - We offer the best products at a reasonable price.
  - We make hard decisions and tackle tough choices.
  - How we go about making these decisions reflects our values.
- **Deliver on Promises**
  - We are people of our word--we deliver on our promises.
  - We are responsible to our stakeholders and earn their trust everyday.
- **Earn a Fair Return**
  - Our reputation is based on our ability to use our values to generate profits.
  - As we deliver on our promises, we must contract for a fair return.

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

# General Dynamics Business Ethics Model

## Talents and Assets

- People + Resources

## Values

- Truth telling
- Promise keeping
- Respect
- Trust
- Integrity
- Stewardship

**Growth  
and  
Profitability**

## Compliance

- Blue Book
- Policies
- Training
- Enforcement
- Oversight

## Business Ethics Principles

- Use assets wisely
- Offer a fair deal
- Deliver on promises
- Earn a fair return

**REPUTATION**

**We are responsible to our Stakeholders**

**Shareholders Customers Each Other Suppliers Communities Country**

# This Booklet

## A Practical Reference

Each day you will face and make decisions that are critical to our success. This booklet is a practical reference that you can use to get the information you need to make good decisions. You will also learn when to contact your business unit's ethics director.

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

The *Blue Book* applies to all officers, executives, and full-time, part-time, and temporary employees of General Dynamics. We expect our suppliers, vendors, contractors, and joint venture partners to develop ethics and compliance programs that are consistent with our values in all material respects. Any amendment or waiver of this *Blue Book* for executive officers of the Corporation may be made only by the Board or a committee of the Board that has been authorized to grant such amendments or waivers and will be publicly disclosed if required by law or stock exchange requirements.

## Business Ethics and Compliance

When we talk about business ethics, we refer to the commitments that make our company great. We deal fairly with our company's customers, suppliers, and competitors, as well as with each other. Each of us should strive to be:

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

When we talk about compliance, we refer to the laws, rules, regulations, and policies that control and direct both our actions and those of our company. The *Blue Book* includes information about both the ethics and compliance aspects of business conduct.

## Global Reality of Our Work

We conduct business in the United States as well as in foreign countries. Our employees are citizens of different countries and belong to diverse cultural groups. We are subject to the laws and regulations of the United States, its states and municipalities, as well as the laws of the countries where we do business. Our worldwide presence subjects us to the regulatory and legal control of many jurisdictions at the same time.

We must recognize the global reality of our work. In some instances, there may be a real or apparent conflict between the laws of two or more countries. In that event, you must obtain legal advice immediately to understand how to resolve the conflict properly.

## Getting Answers

This *Blue Book* will not give you an answer for every situation. Each of us has faced a time where the right course of action was hard to determine. Perhaps the facts were complex. Maybe many individuals could be affected by our decision. Perhaps a “good” choice was just not obvious, or our personal interests conflicted with the best interests of General Dynamics. Maybe we did not have the information we needed to make an informed choice.

You have many resources to help you with questions about ethics and compliance. If you know the answer to an ethics question and are comfortable with your decision, you can act with confidence. If not, you have several places where you may turn for advice and guidance:

- Your supervisor or manager;
- Your business unit’s ethics director;
- Legal Department;
- Equal Employment Opportunity/Affirmative Action officer;

- Environmental, safety, and health official;
- Security;
- General Dynamics Hotline.

## Making Tough Decisions

The information in the *Blue Book* will help you work through most difficult business issues and dilemmas. But if the answers to some problems may not be obvious, take the extra time to think through these questions:

Think of this as our Ethics Quick Quiz —

- Have I reviewed the facts carefully?
- Have I used the resources available to me?
- What are the issues?
- Have I thought carefully about my options?
- What are the consequences of my choices?
- Will my decision stand the test of time?

If you are still not sure what to do, speak up and get the advice you need. Keep asking questions until you are certain you are doing the right thing.

**Remember:  
When in doubt,  
always ask.**

# Conducting Our Business

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

## Antitrust, Sales Practices, and Competitive Information

Antitrust laws prohibit agreements that eliminate or discourage competition. Violations of these laws carry both stiff monetary fines and jail terms. We comply fully with all federal, provincial, and state anti-trust laws.

We are committed to fair and competitive sales practices. We will not engage in practices that would unfairly limit trade or exclude competitors from the marketplace. We will not communicate formally or informally with competitors to fix or control prices, allocate markets, boycott customers or suppliers, or limit the sale of products.

We will not make false statements regarding our competitors, nor conspire to gain or use their proprietary information improperly.

Regarding antitrust laws and competitive practices, you have the following responsibilities:

- Avoid even informal or casual conversations with employees of our competitors regarding prices or products;
- Never make inaccurate or malicious statements about our competitors.

## Conflicts of Interest

A conflict of interest occurs when your private interests interfere in any way—or appear to interfere—with the interests of our company. You should base business decisions on our company's needs, rather than your own interests, the interests of family or friends, or your desire for personal gain. You should not do business with companies in which you, or your family, have a substantial financial interest. Each of us should deal with suppliers, customers, and others in ways that avoid even the appearance of a conflict between our personal interests and those of General Dynamics. Talk to your business unit's ethics director and disclose any situation that presents or might present a conflict of interest.

The following situations can easily give rise to conflicts of interest:

### **Personal Business Relationships**

You should disclose to your business unit's ethics director any substantial financial interest that you or an immediate family member might have in our suppliers, customers, or competitors. You may own no more than 5% of the stock of a publicly traded company that is a competitor, supplier, or customer. Be careful that your personal business relationships never influence the decisions you make for our company.

### **Organizational Relationships**

If you or an immediate family member serve as a director, officer, or consultant for any company that does business with us, you must disclose these obligations to your business unit's ethics director even if the service is unpaid.

### **Outside Employment**

Before you accept outside employment, consider if this second job could create a conflict of interest with your work here or negatively impact your ability to do your job. Taking a second job can be tricky because you may not always see clearly where your loyalties should lie. Do not accept outside employment with our competitors, suppliers, or customers.

### **Gathering Competitive Information**

Properly gathered business information is valuable. Gather information about our competitors only from public sources that are freely available to others. Never spy or steal in order to obtain competitive information.

## **Gratuities, Gifts, and Entertainment**

### **Commercial Customers: Gifts**

We compete solely on the merits of our products and services. When people exchange gifts in a business context, it can look as if favors were granted in order to influence business judgment. We may provide gifts, meals, refreshments, and entertainment of reasonable value in the course of doing business with commercial customers or non-government personnel, provided that this practice does not conflict with our standards or the standards of the recipient's organization. You should not give or offer any gift if, under the circumstances, such a gift might appear to be improper.

### **Receipt of Gifts**

Generally, you should not accept meals from those with whom we do business unless this activity serves a legitimate business purpose. You may accept small gifts that are of modest value only.

Regarding the giving or receiving of gifts, you have the following responsibilities:

- Do not offer or provide gifts when prohibited by the recipient's rules, standards, or policies;
- Avoid accepting or giving gifts above modest value when dealing with commercial customers;
- Ensure that meals and entertainment have valid business purposes.

### **Insider Information and Securities Trading**

You may learn of material information related to General Dynamics or other companies before the general public knows such information. This type of information is called "insider" information. It is illegal for you to buy or sell stock based on such insider information, or to pass this information on to someone else who then buys or sells stock,

until that information has been publicly disseminated. These rules also apply to more complex transactions including options, puts and calls, and techniques such as selling short. The best way to know if information is public is to see it in the newspaper or on television.

To comply with U.S. Securities laws, you have the following responsibilities:

- Do not make securities trades based on non-public information;
- Do not pass insider information to someone who has no need to know.

## International Business

We follow United States law and the laws of the countries where we do business. We abide by restrictions regarding the import and export of our products, information, and technical data.

Overseas, we can encounter unfamiliar rules, regulations, business customs, manners, and cultures. Become familiar with other countries' commercial practices, so that we don't embarrass our company, our business partners, or ourselves.

When conducting international business, it may be customary to accept gifts of substantial value. These gifts are company property. They can be purchased from the company based on a fair assessment of value, or given to your business unit's ethics director for safekeeping on behalf of General Dynamics.

The U.S. Foreign Corrupt Practices Act ("Act") prohibits giving anything of value to a foreign official for the purpose of improperly influencing an official decision. It also prohibits unlawful political contributions to obtain or retain business overseas. Finally, this Act prohibits the use of false records or accounts in the conduct of foreign business. Before offering anything of value to foreign public officials,

including payments to facilitate routine government action, get advance approval from the Legal Department.

United States export control laws and regulations, including the International Traffic in Arms Regulations ("ITAR"), prohibit companies from exporting defense-related and certain commercial dual-use products and technology to foreign countries or releasing controlled technology to foreign persons, whether inside or outside of the U.S., without a license or other legal authorization. In addition, United States law prohibits (absent licenses) dealings with certain "sanctioned" or "embargoed" foreign countries, governments, companies and individuals.

When doing business overseas, you have the following responsibilities:

- Keep current with the applicable United States and foreign laws governing your work;
- Know and follow the laws regarding export and import of our products, technical data and services, including those restricting releases of technical data to foreign persons in the United States;
- Be careful when using international consulting services to represent our interests outside the United States. International consultants, sales representatives, distributors, and contractors must comply with General Dynamics' standards of doing business.

## Lobbying and Political Contributions

Do not contribute any company funds or other assets directly or indirectly to any political party or to the campaign for or against any candidate for political office, if prohibited by federal, state, or foreign law. We encourage every employee to participate individually in political affairs with his or her own time and resources.

## Obeying the Law

Our company operates in a highly regulated environment. Many federal, state, and foreign agencies direct how we conduct our business. We comply strictly with the requirements of these agencies.

We cooperate with government inspections and are courteous to inspectors. Notify the Legal Department immediately if you learn about any inspection, investigation, or request for information from any outside organization.

During an inspection, never destroy or alter any documents, lie to or mislead an inspector, or obstruct the collection of information. The Legal Department will assist you in reviewing any information requested by an inspector before it is released.

## Record-keeping

We keep accurate records of all financial and business transactions. Our record-keeping procedures are essential to ensure that all costs are properly charged.

It is your responsibility to record all costs accurately and to follow all accounting procedures. No false or misleading entries should be made in our books and records.

## Quality and Testing

The quality of our products is crucial to our success. All of our products and services must meet appropriate inspection, testing, and quality criteria in accordance with contract and government requirements. You should complete all test documentation accurately and promptly. With respect to quality and testing, you have the following responsibilities:

- Take personal responsibility for ensuring product quality;
- Know which tests you must perform;

- Know how to carry out these tests;
- Record test results accurately.

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

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

As a condition of their employment, all consultants and part-time or temporary workers are required to follow the *Blue Book* as well as General Dynamics and business unit policies and practices. When dealing with suppliers or consultants, you have the following responsibilities:

- Require competitive bids where appropriate;
- Fairly evaluate all proposals for work;
- Investigate opportunities to encourage small or minority-owned businesses to work with us;
- Get legal advice regarding doing business with former employees or board members;
- Do not accept gifts of more than nominal value;
- Ensure that meals provided by a supplier or consultant are associated with a meeting that serves a valid business purpose.

## Working With the Government

*We are a leader in the defense industry. One of our major customers is the government of the United States. The laws and regulations relating to doing business with the government are complex. Follow these laws carefully to protect our company's reputation.*

### **Bribes and Kickbacks**

We adhere to all aspects of the U.S. Anti-Kickback Act. Employees must never offer, give, ask for, or take any form of bribe or kickback. A bribe or kickback is the giving or accepting of money, fees, commissions, credits, gifts, favors, or anything of value that is either directly or indirectly provided in return for favorable treatment. Favorable treatment often can appear innocent, such as paying an invoice earlier than we normally would. However, favorable treatment is illegal when offered in exchange for a gift.

### **Billing and Pricing**

We are clear and accurate in every aspect of our billing and pricing. Our prices reflect the cost to design and produce our products, our level of effort, market conditions, and other relevant factors. Invoices must be clear and understandable. Overpayments will be returned promptly upon discovery.

Our bills to the government must be timely, accurate, and honest. The U.S. False Claims Act makes it unlawful to present to the government a false or fraudulent claim. We must never improperly shift costs between contracts or projects.

When engaged in billing and pricing, you have the following responsibilities:

- Be accurate in pricing;
- Bill appropriate projects;
- Do not split invoices to hide costs or avoid payment procedures;
- Ensure bills are accurate, timely, and complete.

## Contract Compliance

We comply with all of the terms of our contracts. We deliver the goods and services as promised. We never substitute material, change testing, or alter quality control requirements except in accordance with applicable government procedures. We never certify that something has been tested when it has not been.

To comply with the terms of our contracts, you have the following responsibilities:

- Document how General Dynamics has met its contract obligations;
- Do not make substitutions without following government procedures;
- Perform all tests in accordance with the terms of the contract.

## Gratuities, Gifts, and Entertainment; Government Customers

We compete solely on the merits of our products and services. We do not try to influence a customer's decision to purchase from General Dynamics by offering gifts, meals, or entertainment. Government agencies have regulations prohibiting their employees' acceptance of items of value from contractors or suppliers. We carefully follow these regulations and policies when dealing with agency representatives. These regulations are complex, so make sure you understand them. Consult with your business unit's ethics director or Legal Department.

## Foreign Government Personnel and Public Officials

The giving of gifts, meals, or anything of value to foreign officials may be prohibited. Employees must get advance approval from their business unit's ethics director or Legal Department before offering or giving any items to foreign public officials.

## Hiring Former Government Employees

Federal law restricts the hiring of certain government employees who were involved in awarding or administering government contracts to General Dynamics. Be careful to get advice from the Legal Department before recruiting, interviewing, hiring, or assigning work to former U.S. Federal Government employees.

## Procurement Integrity

We follow the government's procedures for awarding contracts. We will not ask officials to disclose the proprietary information of our competitors, nor will we ask for source selection material—the material the government has developed to evaluate competing bids. We are careful not to share any of our own proprietary information with government officials who are not on the government's list of approved persons. We do not discuss employment or offer anything of value to government employees who participate in the procurement process.

## Security of Government Information

We have an obligation to protect classified information. We will not seek access to information for which we do not have proper clearance and the need to know.

It is your responsibility to follow all company and government procedures for handling classified information.

## Time Charges and Expense Reporting

We bill our customers honestly for our work. We charge our time and expenses consistently with company accounting procedures. It is your responsibility to record your time and expenses carefully, promptly, and accurately. Any employee, consultant, or contract labor personnel found to be mischarging is subject to disciplinary action up to and including termination of employment. If you knowingly make false time charges, you may be guilty of a crime.

## Working With Others

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

### Community Relationships

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

### Equal Employment Opportunity

Our success depends in great part on our work environment. We support a positive environment in which all individuals may grow, contribute, and participate free from discrimination. We are committed to legally compliant human resource policies and practices in all aspects of employment, including: recruiting, hiring, evaluation, training, discipline, work and service assignments, career development, compensation, promotion, and termination. We do not tolerate unlawful discrimination of any kind.

To ensure lawful treatment for all employees, you have the following responsibilities:

- Treat your fellow employees equally, regardless of race, color, sex, national origin, age, religion, disability, or other protected status;
- Understand and abide by all corporate and business unit policies, procedures, and work rules relating to equal employment and affirmative action.

### Drug-Free Work Environment

We maintain a workplace that is free from the effects of drug abuse. We do not tolerate any use of illegal drugs or abuse of controlled substances while employees are engaged in General Dynamics' business, or while working at a company location. Illegal drug use or abuse of controlled substances threatens our ability to serve our customers. It compromises the safety of our people, products, and services.

We reserve the right to test employees who appear to be unfit for work due to suspected illegal drug use or abuse of controlled substances. We reserve the right to search company property at any time.

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

## Harassment

Harassment is behavior that disrupts another employee in his or her work because of the employee's race, color, religion, national origin, age, physical or mental disability, or gender. Each of us has the right to be free from improper or offensive conduct at work. Unwelcome, insulting, or offensive remarks or actions have no place at our company.

To maintain an atmosphere free of harassment, you have the following responsibilities:

- Understand and abide by all corporate and business unit policies, procedures, and work rules relating to workplace harassment;
- Exercise good judgment in professional and personal relationships with co-workers.

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

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

## Safety and Health

We follow all federal, provincial, state, and local laws regarding workplace safety and health. In addition, we prohibit the possession of any licensed or unlicensed firearm or weapon on company property without authorization from the security office.

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

- Report all safety hazards and accidents;
- Follow the rules of your business unit concerning smoking during work hours while on company property;
- Report all suspected violations of safety procedures to your supervisor or safety and health department.

## Workplace Violence

We do not tolerate violent behavior at any workplace, whether committed by or against our employees. The following behaviors are prohibited: making threatening remarks, causing physical injury to someone else, intentionally damaging someone else's property, or acting aggressively in a way that causes someone else to fear injury.

Use good judgment and promptly inform your supervisor, manager, Human Resources, or Security if you observe behavior that could be dangerous or violent.

## Protecting Our Resources

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

### Company Resources and Intellectual Property

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

Managers may authorize personal use of company resources where such use does not occur during working periods. This use must not last long or occur frequently, nor may it consume a significant amount of company resources.

Business opportunities are also company assets. Do not take for yourself any business opportunities that you discover using company resources. It is everyone's duty to advance General Dynamics' legitimate interests when we have the chance to do so.

Our intellectual property is a valuable asset. This includes copyrights, patents, trade secrets, trademarks, ideas, inventions, and processes. We respect and protect intellectual property, whether it belongs to us or to others. General Dynamics owns all inventions, discoveries, ideas, and trade secrets created by employees on the job or produced using company resources.

### Confidentiality

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

While we respect employees' privacy, we reserve the right to inspect our facilities and property, such as computers, telephone records, lockers, e-mail, files, business documents, and workplaces. Employees should not expect privacy when using company-provided services or equipment.

You may have access to customer, company confidential, or proprietary information that must be protected from disclosure. The duty to keep information in confidence continues even after you leave our company.

## Customer Privacy

Our business is based on information. You may have access to sensitive, confidential, or proprietary information about our customers, and others with whom we do business. We earn their trust by protecting the privacy of their information.

## Environmental Protection

We protect the environment of the communities in which we work. We comply with all federal, provincial, state, and local environmental regulations, including local recycling laws and waste disposal requirements.

To protect the environment, you have the following responsibilities:

- Follow all environmental guidelines and procedures for handling and disposing of waste and hazardous materials in the workplace;
- Prevent and report any spills or leaks;
- Report to your supervisor or manager any actions that may adversely affect the environment.

## Information Technology

Like all of our other assets, our information technology is a company resource that must be used only to further our company's business. You should never use our technology or systems to support a personal business or political venture. We protect our computer systems from unauthorized access by outsiders.

Most of the software we use is licensed for business use only. Unless expressly permitted, software programs may not be copied for business or home use or shared with others.

When using information technology, you have the following responsibilities:

- Safeguard all computer equipment and data;
- Do not use software for which we do not have a license;
- Do not share computer passwords;
- Do not copy or distribute software for business or home use unless specifically authorized by the software license.

## Internet Use

Supervisors and managers may permit Internet use during non-working periods. However, Internet access should not be used to support a personal business or political venture, violate any of the standards in this *Blue Book*, or embarrass General Dynamics. You may never use the company's Internet access to view, send, or forward information that is sexually explicit, discriminatory, derogatory, illegal, profane, or abusive. General Dynamics may monitor or filter Internet use in order to maintain and enforce our standards.

## Our Name and Reputation

General Dynamics is proud of its name and reputation. Public perception is critical to our continuing corporate success. We provide accurate and timely information about our business to our investors, the media, and the general public. We are very thoughtful about what we say when releasing information publicly.

If you receive an inquiry from the media, notify your respective business unit or corporate Communications Department and let them respond.

## Taking Action

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

### Our Company

General Dynamics updates and distributes the *Blue Book* to all employees. Through training and communication, we convey to employees our *Standards of Business Ethics and Conduct*. We enforce compliance with these standards.

We make the following available:

- Policies and procedures;
- Training and education;
- Confidential resources where you can get advice and make reports;
- Hotlines;
- Ethics and compliance offices in the business units and at corporate headquarters.

All conversations, calls, and reports made in good faith will be taken seriously. We will investigate all reported concerns—promptly and in confidence—and resolve those concerns appropriately. If we find that our standards have been violated, we will take action, including imposing disciplinary action, implementing system-wide changes, or notifying the right governmental agency. Not only will we deal with a specific situation, but we will also make changes so that similar problems do not recur.

## Managers and Supervisors

Managers and supervisors are expected to provide timely advice and guidance to employees on ethics and compliance concerns. The more we talk openly about business conduct and standards, the clearer we will be about what is expected. Managers and supervisors should:

- Lead by example;
- Affirm the need to follow the laws, regulations, and policies that control our business;
- Encourage employees to ask questions and get advice before they act;
- Consult with their business unit ethics director;
- Implement control measures to detect compliance risks;
- Take prompt action to correct problems.

## Employees

As an employee, you are expected to:

- Read, understand, and use the *Blue Book*;
- Learn the details of the policies that specifically impact your work assignments;
- Use the resources available to you for guidance and assistance;
- Take the training required to do your job;
- Cooperate with any internal investigations about a reported ethics or compliance matter.

When you are uncertain about the right course of conduct, ask questions and get answers before you act.

## Confidential Conversations

Conversations with your business unit's ethics director are treated confidentially, consistent with our legal obligations and policies. You will be told if your identity is needed to address your question or concern satisfactorily.

Calls to our employee Hotline are confidential and will not be traced. You may remain anonymous when you call. We will attempt to protect the identity of anyone who makes a good faith report or inquiry consistent with our legal obligations. Be advised that anonymous communications sometimes make it very difficult to report back to you and may limit the thoroughness of our investigation.

## How the Hotline Works

You can always call our Hotline to express a concern, or report a possible violation of laws, regulations, or policies. When reporting a concern, you may be asked to provide the time, location, names of the people involved, and other details so that we can investigate your concerns. Every call to the Hotline is handled promptly, discreetly, and professionally. We will investigate reports of illegal or unethical conduct received through the Hotline, and take appropriate action to resolve each reported matter.

**General Dynamics  
Business Ethics Hotline**

**800-433-8442**

24 hours a day, 7 days a week

From outside the U.S., call collect 770-613-6315

## Investigating Suspected Violations of Our Standards

If you believe that someone associated with General Dynamics has violated our standards, you are expected to bring the matter in good faith to the attention of your supervisor or manager, your business unit's ethics director, Legal Department, or the corporate Ethics Officer so that we can conduct a prompt and thorough investigation. You can make reports by telephone, through e-mail, by making an appointment, or by contacting our Hotline.

You have a personal responsibility to report activity that appears to violate laws, regulations, policies, or this *Blue Book*.

## Prohibition Against Retaliation

General Dynamics will not retaliate against any person who brings to our attention in good faith an ethics or compliance issue. Individuals who raise concerns or who help us resolve reported matters are protected against retaliation. Anyone who uses the ethics and compliance program to spread falsehoods, threaten others, or damage another person's reputation will be subject to disciplinary action.

Discouraging other employees from making a report or getting the help they need is prohibited and could result in disciplinary action.

## Disciplinary Action

Violations of laws, regulations, principles, this *Blue Book*, or our policies can have severe consequences for you and for General Dynamics. Some violations may be criminal in nature and punishable by fine or imprisonment. Violations can jeopardize our relationships with our customers and suppliers, and could result in loss of the privilege to do business in the United States or in other countries. Employees who violate the laws, regulations, these standards, or our policies are subject to disciplinary action up to and including dismissal.



- Accounting procedures, 10
- Anti-Kickback Act, 11
- Antitrust, 7
  
- Billing and pricing, 11
- Boycotts, 7
- Bribes, 11
- Business ethics model, 4
- Business ethics principles, 3
- Business opportunities, 15
  
- Chairman's message, 1
- Community relationships, 13
- Competitors, 7, 8
- Computers, 16
- Confidentiality, 15, 18
- Conflicts of interest, 7, 8
- Consultants, 5, 10
- Contract compliance, 12
- Contractors, 5, 12
- Corporate citizenship, 13
  
- Dilemmas, 6
- Disciplinary action, 19
- Documents, 9, 10
- Drug-free work environment, 13
  
- Employment agreement, 5
- Entertainment, 8, 12
- Environmental protection, 16
- Equal employment opportunity, 13
- Ethics quick quiz, 6
- Expense reporting, 12
  
- False Claims Act, 11
- Financial interests, 8
- Firearms, 14
- Foreign Corrupt Practices Act, 9
  
- Getting answers, 6, 17
- Gifts, commercial customers, 8
- Gifts, government customers, 12
- Government employees, former, 12
- Government inspections, 9
- Gratuities, 8, 12
  
- Harassment, 14
- Harassment, sexual, 14
- Hotline, 6, 17, 18
  
- Illegal drugs/controlled substances, 13, 14
- Import/Export, 9
- Information, classified, 12
- Information, competitive, 7, 8, 12
- Information, proprietary, 12
- Information technology, 16
- Insider information, 8, 9
- Intellectual property, 15
- International business, 6, 9, 12
- Internet, 16
- Investigation, 9, 19
- Invoices, 11
  
- Kickbacks, 11
  
- Lobbying, 9
  
- Meals, 8, 12
- Media, 16
  
- Outside employment, 8
  
- Political contributions, 9
- Privacy, 15, 16
- Procurement integrity, 12
  
- Quality, 10
  
- Record-keeping, 10
- Relationships,
  - organizational, 8
  - personal business, 8
- Reputation, 16, 19
- Resources, protecting company, 15, 16
- Retaliation, 19
  
- Safety and health, 14
- Sales practices, 7, 11
- Securities trading, 8, 9
- Source selection materials, 12
- Stock, 8, 9
- Substitutions, 12
- Suppliers, 5, 8, 10
  
- Testing, 10
- Time charges, 12
  
- Workplace violence, 14

GENERAL DYNAMICS