





# Making Good Decisions, The GEA Way.

# Our Code of Ethics



SECTION

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# A Message From Our Chief Compliance Officer

For more than 100 years, GE Appliances has made the world's best appliances that are trusted in more than half of all U.S. homes. We do this the GEA Way—we come together, we create possibilities and we always look for a better way. While what we do is important, how we do it is even more important. Integrity is doing the right thing even when no one is watching. Our stakeholders, such as owners, customers and suppliers, trust that GEA promotes a culture of compliance that's rooted in ethical decisions.

As you read the Code of Ethics, think about how your decisions, whether big or small, can impact our colleagues, business partners and the community. Every day you have the opportunity to make decisions that build trust within and outside of GEA. When faced with an uncertain situation, I encourage you to pause and think. Ask yourself, "Is this the right thing to do?"

The Code contains guidance to help you navigate decision making in a way that reflects the GEA Way. You should lean on this guide to ensure your decisions build trust in our company and enhance the reputation of GE Appliances. Now more than ever, our owners and customers want to know they are doing business with a company that has people and products they can trust.

Regardless of your role at GEA, it is your responsibility to represent the GEA Way in everything you do at work, to know and follow the Code of Ethics, and to report any possible violations. The Leadership team, along with the Compliance team, is here to answer any questions and provide guidance. Remember, when you make good decisions, everyone wins.

Jason L. Brown Chief Compliance Officer Vice President, Legal GE Appliances, a Haier company

"Now more than ever, our owners and customers want to know they are doing business with a company that has people and products they can trust."



01

# Introduction

Our Legacy of Integrity Our Code Our Culture Our Responsibilities Making Good Decisions



# **Our Legacy** of Integrity

At GE Appliances, a Haier company, we come together to make "good things, for life." We're creators, thinkers and makers who believe that anything is possible and that there's always a better way. We're a company powered by our people, made stronger through our diversity. Together, we're creating possibilities, growing closer to our owners, anticipating their needs and enhancing their lives, every day. We call it The GEA Way, and it's changing the way we think and do business.

We're on a mission to be and be recognized as the number one ecosystem appliance company in America-but we know this cannot be achieved through only the products we invent and create.

The decisions we make and the way we do business must connect us to our greater purpose and allow us to make a difference through our work, our relationships, our shared principles and our culture.

The world's best appliances are what we create, but the decisions we make define who we are as a business. To ensure that our culture of integrity only grows stronger, we've made Compliance and Ethics a key pillar of our Corporate Citizenship efforts, which are at the heart of our work at GEA.



# **Code of Ethics** Foundation



#### Integrity

Do the right thing, even when no one is looking and the decision isn't easy.

#### Accountability

Hold ourselves and others accountable for our words, choices and actions.



#### Inclusion & **Diversity** Be a force for good:

Citizenship

for our people,

Maintain a culture products, the planet where every person and communities. is welcome, valued and included.



#### Teamwork

Empower and support each other, from idea to invention.



#### Passion

Spark ideas, energy and excitement to help drive innovation.

# **Our Code**

# Why do we need the Code?

Everything we do is a reflection of our company and our brands, and every decision we make has the potential to affect others. We created our Code of Ethics to uphold our commitment to operating with the highest ethical standards—from the choices we make to the products we invent and build.

It anchors our culture of compliance—outlining the policies, procedures and guidelines that govern the way we do business.

# How can the Code help me?

Our Code of Ethics is here to help you:

- Act with integrity, honesty and the highest ethical standards.
- Uphold our principles through your work and actions.
- Make good decisions every day.
- Understand what GEA expects from you and what you can expect from GEA.
- Speak up, ask questions and raise concerns.
- Comply with laws, regulations, policies and standards that apply to our business.
- Seek guidance, assistance and support when needed.

# Who has to comply with the Code?

- Employees
- Subsidiaries
- Third parties

While each of our roles is different, we all play a part in upholding GEA's commitment to integrity and to maintaining the highest standards of business conduct.

# What happens when the Code is violated?

All reported instances of alleged violations to the guidance and policies set forth in the Code of Ethics will be investigated. If the allegations are confirmed, corrective actions will be implemented.

Any violation of our Code, our policies or the law is subject to disciplinary action up to and including termination. In the case of unlawful behavior, you may be subject to civil and/or criminal penalties imposed by a court or governmental agency.





# **Our Culture**

#### Driven to do what's right.

Our employees and our integrity are our most important assets, anchoring our commitment to create a culture of ethics and compliance that's rooted in good and responsible decisions. Our reputation has taken over a century to build, but it can be lost in an instant if we don't uphold the highest ethical standards every day, in everything we do. While our Code cannot answer every question you may have, it will empower you to make good choices and help point you in the right direction if you have questions or concerns.

#### **Speaking Up and Raising Concerns**

If you're concerned about something you see or experience, speak up. We're committed to maintaining an open culture where every question is answered and all voices are heard. All concerns and reports of possible violations will be investigated and resolved in a timely manner.



#### In-person

Contact your supervisor, Business Compliance leader, HR leader, Finance or <u>Legal business partner</u>, EHS, or an Ombudsperson.



#### Call

Anonymously report concerns by calling the toll-free hotline: **1-866-585-1263** 



#### Online

Submit a concern through any of the following channels:

#### **Ombuds Portal:**

Ways to anonymously report concerns on the Ombuds portal:

- 1. Click on the Ombuds icon on your desktop,
- 2. Access the <u>Ombuds Portal</u> from the ABC menu on GEA Connect, or
- 3. Visit ombuds.geappliances.com.

#### Managers' Concern Reporting Tool:

Access the <u>Managers' Concern Reporting Tool</u> from the ABC Menu on GEA Connect.

#### Text

Report an anonymous message by texting "**274637**" in the "to" field. Start your text with the word **OMBUDS** followed by a space, then type your text tip and send.



#### Zero Tolerance for Retaliation

All complaints will be responded to in a timely and supportive manner. If you believe you've been retaliated against for reporting a concern, please reach out using any of the contact methods mentioned on page 7. All claims will be investigated.

We do not tolerate any form of retaliation against anyone who raises a concern in good faith.

# What should you do during an investigation?

#### **Do Not Retaliate**

We have ZERO tolerance for retaliation against anyone raising a concern in good faith regarding this Code, or any law, policy or regulation. Retaliation claims can be made through the reporting channels and will be investigated thoroughly.

#### **Fully Cooperate**

All GEA employees are obligated to speak up when they see a possible violation, to cooperate fully in investigations of misconduct, to act with integrity and to foster an environment where compliance and ethics are integral to success.

#### **Tell The Truth**

All parties involved in a concern are expected to be truthful and honest in statements made about performing their jobs. This includes the preparation of company reports and documents of any kind, from expense reports to financial statements. Not only do false statements breach this commitment, they may also be illegal and carry consequences for both GEA and the individual employee, up to and including termination.

### What happens when a concern is raised?

We take concerns seriously and investigate all reports to the fullest extent. Once a concern has been raised, the following steps are taken. Confidentiality is maintained to the fullest extent possible.

#### 1. Intake

Ombudsperson meets with the individual raising the concern (if known) to obtain the facts.

#### 2. Investigate

Concern is investigated thoroughly and confidentially. Relevant documents are reviewed and investigative interviews are conducted with the key parties involved. All parties involved in the investigation are expected to fully and honestly cooperate throughout the process.

#### 3. Findings/Recommendations

Investigation findings are documented and reviewed. If the allegation is proven true based on facts obtained during the investigation, corrective actions are recommended. Proposed corrective actions are reviewed by GEA Legal to ensure consistency.

#### 4. Close-Out

After the investigation is complete, the individual raising the concern (if known) is notified.



#### What is workplace retaliation?

Workplace retaliation is when employees or leaders within organizations or companies take negative action against employees for exercising their rights under employment laws. These adverse actions may include:

- Termination
- Demotion
- Discipline
- Reassignment
- Harassment
- Reduction in pay,
- benefits or hours



### What does "in good faith" mean?

Acting in good faith is our implied duty to be fair and honest in all of our business dealings. Generally speaking, this means being sincere and without a desire to defraud, deceive, take advantage of or act maliciously towards others in any way.

# **Our Responsibilities**

#### What we expect of our employees.

The relationships we have with our owners, customers, suppliers, government stakeholders and communities set the tone for our entire business. Those relationships are all based on one thing—trust. Their trust in us is built on our products and the good decisions our employees make every day. By continuing to do the right thing, we're able to put our ethics into action and to build on our culture of integrity, which reflects who we are as a business.

#### **Employee Responsibilities:**

#### As an employee, you're expected to:

- Always speak up when you have a concern.
- Make all financial information and reports accurate and complete.
- Avoid conflicts of interest.
- Obey all laws and regulations.
- Handle government business with the highest ethical standards and in compliance with applicable laws.
- Compete fairly and provide fair treatment to our customers and suppliers.
- O not give, offer or take bribes.

- Safeguard employee, customer, supplier and product owner business and personal information.
- Make product safety a priority.
- Practice non-discrimination and value inclusion and diversity in employment decisions.
- Comply with workplace health, safety and environmental protection laws.
- Protect GEA's intellectual property (patents, trademarks, etc.) and secure access to our networks, devices, systems and business confidential information.

#### Leadership Responsibilities:

As a leader with managerial responsibilities, you're also expected to:

#### Be the example.

Lead by example, consistently demonstrating the principles and commitments set forth in this guide.

#### Prioritize ethics.

Hold yourself and others to the highest ethical standards, be transparent with your teams and set the tone for our expectations.

#### Empower others.

Foster an environment of trust and respect, where employees feel comfortable turning to you for help.

#### Never retaliate.

Address all employee concerns raised in good faith with zero risk of retaliation.

#### Recognize ethical dilemmas.

Know how to spot tough situations, analyze risks and listen to your gut if something doesn't seem right.

#### Important Reminder:

We count on *all* of our employees to demonstrate the strong sense of integrity that's built our business. Employees across all levels of GEA, including leadership, are held accountable for any violation of our Code, our policies or the law.

If someone violates our Code, neglects to report another employee's misconduct or supports an individual in a code violation, disciplinary action may be taken, which could include termination. In the case of unlawful behavior, you may also be subject to civil and/or criminal penalties imposed by a court or governmental agency.

# **Making Good Decisions**

#### How to navigate ethical dilemmas.

As leaders in our industry and communities, it's our responsibility to cultivate a highly ethical environment where every person is empowered to make good decisions. Our Code of Ethics can help you determine the best way forward in tough situations.

#### A Guide to Making Ethical Business Decisions

While acting ethically is always the right thing to do, it's not always easy. Before taking action, ask yourself:



#### What's the difference between personal ethics and business ethics?

As an employee, you have a right to your personal ethics, but GEA's ethics must guide your business-related decisions and conduct.

- Personal Ethics are the values, beliefs and judgments that YOU hold personally. For example, your stance on issues such as religion and politics are developed through your personal ethics.
- Business Ethics are GEA's policies and standards that must be followed by all employees. For example, accepting gifts from suppliers and engaging with governmental officials are governed by our GEA Code of Ethics.

# 02 Trust: Our Guiding Principle

Trust with Our Owners, Customers and Suppliers

Trust with Our Employees

Trust with Our Government Stakeholders and Communities

# Trust With Our Owners, Customers and Suppliers

The relationships we have with our owners, customers and suppliers set the tone for our entire business. Without their trust, GE Appliances would not have been in business successfully for more than 100 years, and we're dedicated to making their needs and interests top priorities.

We know that our reputation as one of America's most trusted brands depends on the integrity of not only our internal teams, but of our contracted agents and suppliers alike. Our trusted third-party representatives play a key role in promoting our highly ethical culture and are required to fully comply with the laws, regulations and policies that govern our business activities. To mitigate risks and ensure every individual working with GEA shares our commitment to operating with highest ethical standards, we hold all third parties to the same standards as our employees.

#### Protect Consumer Privacy and Personal Data

We protect the privacy of our owners and take active steps to ensure that all personally identifiable information is appropriately safeguarded. We provide our owners with the ability to opt-out of marketing, while retaining the right to inform them in the event of a necessary service or safety-related communication.

Before requesting access to consumer data or implementing new or significantly modified processes that use it, including new software, you'll need to consult with a Privacy Core team member or Legal business partner for a privacy review.

#### Learn More

- Privacy Policy
- Privacy and Data Protection
- <u>Privacy Core Team Roster</u>

#### What If?

I conducted a training session at a customer site and obtained an attendance sheet for documentation purposes. Can I use this attendance sheet to reach out to the attendees in the future on unrelated training topics?

No, the purpose of the attendance sheet was to document who was present at the training session. You should provide your contact information during the presentation if an attendee wants to proactively reach out to you in the future.

#### **Compete Fairly**

We compete in the global marketplace using ethical business practices. Antitrust and competition laws are designed to protect the free market by prohibiting unreasonable restrictions on competition. Mindful of the severe consequences to GEA and individual employees of violating these laws, we comply by engaging in fair competition against our competitors and fair treatment of our customers, and have established processes to promote compliance.

#### Ask Yourself:

- Could this negatively impact GEA's reputation?
- Could this make others inside or outside of GEA question my loyalty to GEA?

#### Learn More

- Fair Competition Policy
- <u>Competitor Contact Disclosure Tool</u>

# Be Truthful in Marketing and Advertising

We know that it's our responsibility to be transparent and truthful in the way we advertise our business, products and services. We're committed to keeping the trust of our owners and customers by being honest about our company and what we sell. Anyone promoting our products or services must:

- Follow all applicable advertising laws where we operate.
- Steer clear of unfair, deceptive or misleading practices.
- Avoid making unsubstantiated claims and erroneous comparisons between competitor products and ours.



#### What If?

I am at a trade show and ran into a competitor at dinner. We have known each other for years and it was good to catch up. We did not discuss business. Do I need to disclose this encounter to GEA?

Yes, you should disclose it. Even if business wasn't discussed, it's best to disclose the conversation through the <u>Competitor Contact</u>. <u>Disclosure Tool</u>. As a reminder, discussing business with a competitor can create significant legal risks for GEA, as well as for yourself individually. If a competitor tries to discuss business with you, STOP the conversation immediately and politely remove yourself from the situation.



- Employees of public schools and university staff
- Firefighters, police officers, EMTs
- Community agency staff
- Political candidates
- Military personnel







#### **Prevent Bribery and Corruption**

We do not seek competitive advantages through unethical business practices. We strictly prohibit giving, offering, authorizing or taking bribes in all business dealings. This includes bribery of or making facilitating payments to government officials. This conduct violates the laws of the U.S. and many other countries.

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### Gifts and Entertainment for Government Officials

Gifts and entertainment for government officials and employees are highly regulated by law and in many cases are completely prohibited or require a government filing. GEA prohibits facilitating payments to any government official, even if such payments are permitted by local anti-bribery law exceptions.

Before meeting with government officials, employees must obtain approval from Legal. This gives our attorneys a chance to review the complex laws related to the specific situation and help ensure compliance with these laws. For examples of government officials, please reference page 13 under "What is a Government Official?"

#### Learn More

<u>Government Courtesies</u>
 <u>Pre-Approval</u>



#### What is considered a gift?

All potential gifts to government officials must be approved by GEA Legal. A gift is defined as, but not limited to:

- Products
- Meals
- Entertainment
- Special pricing
- Consignment of GEA products
- Use or access to GEA resources, facilities or transportation

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#### Money Laundering

We understand that criminal activity, like money laundering, can often go unseen. To reduce our risk, we closely monitor customer and supplier transactions with appropriate due diligence and screenings.

#### What is Money Laundering?

Money laundering is a process that aims to conceal the origins of illegally-obtained money by making it appear to have come from a legitimate source. This is often done by transferring money through legitimate businesses or commodity purchases.

#### **Red flags**

Keep an eye out for the following warning signs, which may require further verification:

- Reluctance to provide information about ownership interests
- Credit reviews or financial statements that are too good to be true or with missing or incomplete information
- Frequent customer address changes
  Unknown final destination of product
- Change of shipping address after order placement
- Product shipping to a storage facility
- Requests to export outside of the U.S.
- Payments through unapproved/ unknown third parties
- Unacceptable forms of payments (cash, money order, cryptocurrency)



#### Handle Gifts, Business Entertainment Responsibly

All business transactions and relationships representing GE Appliances must be free from any perception that preferential treatment is being sought, received or offered in exchange for gifts, sponsorships, hospitality and/or other business courtesy.

Gifts and entertainment are considered to be anything of value, which includes but is not limited to: meals, lodging, loans, cash or cash equivalents, services, prices, products, tickets to entertainment events, gift cards, use of company vehicles and facilities, and more.



#### What If?

I received a gift card from our supplier to a local restaurant after the successful launch of a new product. How should I handle this?

Gift cards of any amount are a violation of GEA's Gift and Business Entertainment Standard. Employees cannot give or receive cash or cash equivalents (regardless of amount). Employees should immediately notify their manager and Legal partner of the improper gift so that the proper corrective actions can be taken.

#### Prevent Bribery and Corruption (Cont.)



#### **GEA Gift Giving Checklist**

Before participating in the exchange of any gift, hospitality or entertainment offering, ask yourself the following questions:

#### Is it legal and of good intent?

All gifts must be in compliance with local laws and be disclosed where legally required.

#### Is it appropriate and in good judgment?

All gifts must be appropriate in nature and align with GEA's, as well as the recipient's, standards of business conduct.

#### Is it of reasonable value?

All gifts must be purchased with discretion, modesty and in accordance with GEA's general business practices and policies.

#### Do I need approval from GEA to give or accept this gift?

Gifts over GEA's established <u>threshold</u> require management and Legal approval. All cash and cash equivalents (including gift cards) violate GEA's Gift and Business Entertainment Standard and should never be given or accepted as gifts.

#### Is the recipient a government official or employee, or the family member of one?

In compliance with the government's ethics rules, the exchange of gifts or services between local, state or federal officials or employees (or their family members) is prohibited.

#### Learn More

- <u>Anti-Bribery & Corruption Prevention Policy</u>
- <u>Gift & Business Entertainment Standard</u>



#### **Uphold Supplier Integrity**

We're committed to unyielding integrity and the highest standards of business conduct in everything we do, especially in our dealings with GEA suppliers, contractors and consultants.

All of our supplier relationships are based on lawful, efficient and fair practices. Suppliers must adhere to applicable legal and regulatory requirements in connection with their business activities in relation to GEA as outlined in our Integrity Guide for Suppliers, Contractors and Consultants.

Our Supplier Integrity Guide sets forth our commitment that our suppliers conduct their business operations appropriately. We globally survey and audit suppliers to assess their capabilities and commitment to maintaining lawful and fair business practices that meet our high expectations.

#### Learn More

 Integrity Guide for Suppliers, Contractors and Consultants



While visiting a prospective new supplier, I see what appears to be an adolescent working at the facility. How should I handle this?

You should immediately report the situation to your manager and GEA Legal. While this business is not a current supplier, we expect all suppliers who want to do business with GEA to adhere to Human Rights laws.



# Trust With Our Employees



The foundation of every successful relationship is trust. Only by building genuine trust with our teams can we earn the trust of our industry, owners, communities, suppliers, regulators and investors. We know that when people feel trusted, they do their best work. That's why we're committed to fostering a high-trust workplace where people are empowered and respected throughout all aspects of our business.

#### Foster Diversity and Inclusion

We believe in a culture where everyone is welcome, valued and included. This means making sure every employee is respected, treated fairly and given an equal opportunity to succeed. Creating, managing and valuing inclusion and diversity in our workforce is not an option at GEA—it's part of who we are.

#### We do not discriminate.

This means we do not make employment-related decisions based on a person's race, color, national origin, religion, sex, age, sexual orientation, gender identity or expression, marital status, veteran status, other characteristics protected by applicable law, and/or disability, where we make reasonable accommodations when appropriate.

#### We do not tolerate harassment.

Harassment includes any conduct that has the purpose or effect of creating an intimidating, offensive or hostile work environment for another person. Harassment can take many forms, including physical actions, written or spoken comments, videos or pictures, and innuendo. Sexual harassment can include unwelcome sexual advances, requests for sexual favors or other visual, verbal or physical conduct of a sexual nature. Harassment will not be tolerated in any circumstance.

#### We value every voice.

At GE Appliances, we believe in building a culture where everyone is welcome and every voice is heard. We're committed to continuing to invite hard conversations, learning to be comfortable in our discomfort, tearing down systemic barriers that separate us from equality and building a community and a company where inclusion is real, not a slogan. We expect all of our employees and suppliers to join us in this commitment.

#### Come Forward and Report Concerns

If you see or hear something that just doesn't seem right, the first step is to seek advice. The guidance and policies in our Code are here to help you determine the best path forward in difficult situations, but it's not always easy or clear. When in doubt, always speak up.

Remember, you are the eyes and ears of our company and are strongly encouraged to report all concerns. We strictly prohibit retaliation against anyone raising a concern in good faith regarding this Code of Conduct or any law or regulation.

#### Learn More

- Fair Employment Policy
- <u>Prohibiting Harassment</u>
   <u>Discrimination and Retaliation</u>



#### What If?

I recently interviewed for a new role. I have worked at GEA for 15 years, while the other candidates were just a few years out of college. During the interview, the hiring manager was complimentary of my experience, but commented that he was looking for someone that had a "longer runway." I did not end up getting the role. What should I do?

You should report this to your manager, HR manager, Legal or someone on the Compliance team so that the hiring process in this situation can be investigated further.

#### Maintain a Safe and Healthy Workplace

Having a safe and healthy work environment is a basic human right. To protect you, suppliers and customers who work at or visit our facilities, we operate with the highest standards of safety.



#### We protect our workplaces.

Within reasonable measures, we limit access to GEA workplaces to secure them from uninvited visitors or those seeking to harm our employees or facilities.



## We prioritize health and safety.

We're committed to fostering a safe and healthy working environment through programs that ensure compliance, eliminate hazards and reduce risks. Promoting health and safety is a collective effort and everyone at GEA plays an essential role. We provide processes for employees to report Environmental Health and Safety (EHS) concerns openly and receive timely feedback. Ongoing education supports our employees to execute their individual EHS responsibilities and maintain a safe environment.

#### Learn More

 Environmental Health & Safety Policy

#### We do not tolerate violence.

Violent conduct and threats of violence will not be tolerated. Anyone who engages in this kind of conduct or brings threatening materials or objects into the workplace will be subject to disciplinary action.

# We maintain tobacco-free

#### and drug-free working environments.

Possessing, using, selling, distributing or manufacturing illegal drugs or controlled substances on company premises or by anyone conducting company business is strictly prohibited.

#### A)

# We follow all applicable workplace health and safety laws.

This includes when operating company and personal vehicles. You're expected to follow all posted safety and emergency procedures, including reporting any unsafe conditions or activities.

#### Learn More

<u>Workplace Violence</u> <u>Prevention Policy</u>

#### What If?

I observed an employee from the Quality team cleaning off contaminated parts/units in the plant. When I asked the employee if they followed the chemical approval process prior to using the solvent on the parts, they simply shrugged and didn't comment. What should I do?

The purpose of our chemical approval process is to ensure we don't introduce new or increased health and safety risks to our employees, and ensure we are compliant with our environmental permits. You should report the situation to your manager, HR manager, ombudsperson, or EHS leader.

#### Did you know?

The following are examples of workplace violence red flag indicators:

- Diminished work performance
- Numerous conflicts and/or poor relationships with supervisors/ co-workers
- Repeated statements of being treated unfairly
- Resistance and overreaction to changes in policies/procedures
- Repeated violations of GEA policies
- Noticeable decrease in attention to appearance and hygiene
- Frequent unplanned absences/ tardiness

#### **Avoid Conflicts of Interest**

There may come a time when your personal activities and the work you do with GEA creates, or appears to create, a conflict of interest. In all situations, you're expected to do what's in the best interest of GE Appliances. It's all of our responsibility to act in the company's best interest and to avoid situations that create actual or potential conflicts of interest.

#### What's a Conflict of Interest?

A conflict of interest arises when a personal or family interest interferes with your ability to make sound, objective business decisions on behalf of GEA. Despite the best of intentions, even the appearance of a conflict can be harmful to our business. We all have a duty to disclose actual or potential conflicts of interest using the tools provided by GE Appliances.

#### **Outside Employment**

Some of our employees may choose to engage in outside employment or work activities in addition to their positions with GEA. While we understand and support the "side gig" economy, we must also consider how off-duty work can affect our company.

To ensure that your outside work does not interfere with your performance at GEA, our reputation or our business, please keep the following in mind:

#### "Side Gig" 101

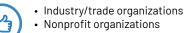
- **Do not** use GEA time or resources (laptops, phones, printers, etc.).
- **Do not** solicit GEA customers or suppliers for business.
- **Do not** share GEA confidential or proprietary information.
- **Do not** work for or with a competitor.
- **Do not** perform non-GEA work during your GEA business hours.

#### Learn More

- <u>Conflict of Interest Policy</u>
- <u>Conflict of Interest Disclosure Form</u>

#### **Board Memberships & Participation**

We encourage our employees to be active members in their communities through board participation. When committing to board memberships or affiliations with external groups and organizations, please be mindful of the following:



- Educational institutions
- Educational Institutions



 Competitor's Board of Directors

• Controversial organizations whose missions do not align with GEA's Code of Ethics What If?

A current GEA supplier offered me a paid, part-time consulting opportunity that would be weekend work only. Is that ok?

This depends on the type of work you would be doing for the supplier. As a GEA employee, you should never compromise GEA's confidential data or processes by sharing it with a supplier.

#### Ask Yourself:

- Could this make others inside or outside of GEA question my loyalty to GEA?
- Could my personal interests or relationships influence the decisions that I make or could it look that way to someone else?

#### What If?

I started a job at a national retailer that is also a GEA customer. I work in the Lawn and Garden department. Is that ok?

This is okay—as long as you're not working in the retailer's appliance department. Why? Because from an ethical standpoint, our employees may not be a neutral voice when interacting with retail consumers about an appliance purchase. Your work with the retailer should also not take place during your GEA business hours.

#### Ask Yourself:

• Could this negatively impact GEA's reputation?

#### **Communicate Responsibly**

At GEA, we're passionate about what we do and the products we make. While our solid reputation has taken more than 100 years to build, it can be damaged with a few untrue statements. To protect the integrity and reputation of our business, we have protocols in place for speaking and acting on behalf of GEA.

#### **Social Media**

Social media is a valuable resource that helps us connect with each other and grow our networks. We encourage a common-sense approach that is inclusive and reflects GEA's culture and Code of Ethics.

When posting on social channels, be mindful of your interactions and remember to:

- Speak for yourself. If you're posting about our company, a product or service, be sure to identify yourself as a GEA employee. It could be as simple as saying that you work for GEA or add a hashtag such as #GEAEmployee. Remember, an ambassador is not the same thing as an official company spokesperson, so pause and check before you post.
- Never disclose confidential information about GEA, our customers, owners, suppliers or competitors.
- Do not post anything that could be considered a threat, intimidation, bullying or harassment.
- If you receive a negative response to your social media post or people want to tell you about their product issue, forward the post to <u>eResponse@geappliances.com</u> and/ or share the eResponse email address with the individual so our business social media team can efficiently respond as appropriate.

#### External Communications

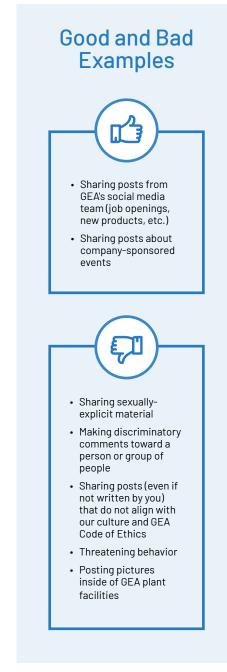
We refer any outside inquiries to our GEA Corporate Communications team to ensure all information pertaining to GEA is accurate, consistent and complete. We designate specific employees, who are trained to speak on behalf of GEA, to communicate with external parties.

If you're asked to present about the business or discuss GEA with members of the press, investors or market analysts, please:

- Remember that no GEA employee, outside of specific authorized individuals, is permitted to agree to an interview or external speaking engagement—whether it's business or personal—in which GEA will be discussed or referenced
- Channel all speaking and media inquiries through our Corporate Communications team.
- Inform the media representative that all media requests are handled by GEA's Corporate Communications team.

#### Learn More

• External Communications and Community Relations Policy



GEA Social Media Policy

Learn More

#### **Protect Our Assets**

Our company's assets are what allow us to successfully carry out our business. From the computers, mobile devices and facilities we use to do our jobs, to the ideas, emails and technology we share, these assets make it possible for us to not just work safely and securely today—but to continue operating with integrity tomorrow. Let's take a look at how we're all responsible for protecting GEA's assets from damage, loss, misuse or theft.

#### Confidential Information and Intellectual Property

One of our most valuable assets is our Intellectual Property. It's only through the ideas, inventions and knowledge of our teams that we're able to design and build the world's best appliances.

Intellectual Property results from the enormous dedication and effort of our employees, as well the huge financial expenditures and investments made by our business. It's protected by copyright, trade and service marks, patents and trade secrets.

- Never disclose GEA's intellectual property without authorization, unless the disclosure is made in accordance with federal law.
- Treat the confidentiality and intellectual property rights of others with the same respect that you would ours.
- Know that you're expected to honor confidentiality, even if you leave GEA.

Examples of intellectual property policy violations include the following:

- Downloading unauthorized software
- Unlicensed use of images, the likeness of a person, quotes, music or other copyrighted materials without permission
- Sharing confidential or proprietary information outside of GEA

Learn More

- <u>Acceptable Use of GEA</u>
   <u>Information and Resources</u>
- Software Governance
- Idea and Invention Submission (For Employees)
- Idea and Invention Submission (For All Others)





- Reaching out to Legal prior to using images or music in a customer presentation
- Follow the <u>Software</u> <u>Governance Process</u> before downloading copyrighted software
- Informing your neighbor of the <u>"Submitted Ideas"</u> program when they tell you about a new product idea



- Unauthorized downloading of data, especially when separating from GEA
- Emailing business documents to your personal email address
- Conducting GEA business via your personal email

#### Did you know?

All information collected and/or created by GEA and by you in your role with GEA, regardless of whether you are working in the office, from home or traveling, is considered GEA's information. This also applies if you are no longer working at GEA.

#### Protect Our Assets (Cont.)

#### Networks, Systems, and Products

Our networks, systems and products drive our business operations. By protecting them, we're able to work better, smarter and more efficiently. We practice excellent cybersecurity to safeguard our networks, systems, devices and information.

- Never download or copy written or digital materials without authorization and the intent to:
  - Maintain appropriate access controls.
  - Conduct security assessments on our products prior to release.
  - Monitor for cybersecurity threats and vulnerabilities.
- Limit access of GEA information to authorized individuals who need it for legitimate business purposes.
- Safeguard our resources by always using company email, telephone, computer and internet systems in an appropriate way. This means that all GEA devices, equipment, systems, services and other tools, materials and technology should be used for business purposes only and for personal purposes only on occasion.
- Respect the resources entrusted to you for business use. Use them the way they're intended and always do your best to protect them from damage, loss, theft and fraud.
- Keep your technology safe and secure. Practice excellent cybersecurity to avoid malware, ransomware, phishing and other forms of attacks that could compromise our systems.

#### Learn More

- <u>Employment Data Protection</u> <u>Standards</u>
- AUGIR—Acceptable Use of GEA Information and Resources

#### **Employee Privacy and Data**

Honoring the privacy of our employees is something we don't take lightly. GEA respects the privacy rights of all of our employees and uses, maintains and transfers personal and medical data only as permitted.

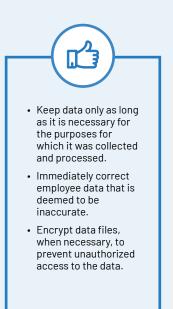
- Protect employee data from unauthorized disclosure by only using information for legitimate purposes.
- Consult with HR and Privacy Counsel before implementing new or significantly modified processes that use any personal information, including new software.

#### **Maintain Financial Integrity**

The accuracy of our accounting and reporting is hugely important to our business. In addition to helping us meet legal and regulatory requirements, it strengthens our reputation and credibility.

- Be timely, accurate and complete when preparing financial information used in reports to the board, management, regulators or other stakeholders.
- Always base management decisions on complete facts and sound economic analysis with appropriate consideration for short- and long-term risks.
- Manage records properly by following all policies, laws and regulations relating to the maintenance, storage and disposal of documents.
- Maintain integrity in all transactions by ensuring that all company expenses and payments are honest, reasonable and appropriate.
- Travel responsibly by making choices that reflect the guidance set forth in our Code and align with GEA's <u>Travel</u> <u>Expense Reimbursement Procedures</u>.

#### Good and Bad Examples





- Send a data file with employee name, SSO#, career level, and manager name to a large distribution group.
- Print employment data and leave it on the shared printer for an extended period of time.

#### Protect Our Assets (Cont.)

#### **Travel Expenses**

We reimburse staff for reasonable and necessary expenses incurred during approved work-related travel. All travel expenses must be documented with receipts and in accordance with <u>GEA's Travel</u> <u>Expense Reimbursement Procedures</u>.

GEA Travel Expense Checklist				
Has your travel been authorized and booked through the GEA Travel & Living system?	All employee travel plans must receive prior approval from a manager or leadership. Verify that your planned travel is eligible for reimbursement. Employees must use the <u>GEA Travel &amp; Living system</u> to make all air, car, and hotel reservations.			
Are your travel expenses reasonable and related to business?	Reimbursable travel expenses cover things like: airfare, transportation, conference registration fees, commercial lodging, meals, and parking.			
What travel expenses are considered nonreimburseable?	The following travel expenses are non-reimbursable: airline upgrades and club memberships; childcare, babysitting, house sitting or pet-sitting/kennel charges; laundry and dry cleaning; evening and formal wear expenses; haircuts and personal grooming; and personal entertainment.			
Did you submit expenses on time and with appropriate supporting documentation?	Expense reports must be completed within 30 calendar days of the date expenses are incurred and must include itemized receipts as support.			
Have you fully reviewed the Travel Policy?	The Travel Policy contains important guidance about employee responsibilities related to travel expenses, required approvals, and allowable expenses. It should be reviewed before traveling and referenced as needed.			

#### Learn More

• Travel & Living/P-Card Policy

# Trust With Our Government Stakeholders and Communities

We take great care in maintaining strong relationships with federal, state and local governments, as well as the communities where we do business. To protect the integrity of our government dealings, we hold our employees and suppliers to the highest ethical standards—obeying all laws and regulations.

#### **Respect Global Laws**

Being a good corporate citizen means complying with the laws, customs and regulations of every country and every community where we do business. In addition to operating with respect for international business ethics, we aim to contribute to and positively impact overseas nations through our work and our relationships.

#### Comply with Global Trade Laws and Sanctions

We diligently follow all global trade laws and sanctions. All GEA employees and suppliers involved in cross-border business must be aware of and comply with international trade sanctions and embargoes. To ensure compliance with laws and regulations, we require proper documentation of all products, materials and technologies that are imported or exported.

#### Learn More

- Global Trade Controls Policy
- List of Sanctioned Programs
- <u>CTPAT Supply Chain Security-</u> <u>Statement of Support</u>

#### Honor and Protect Human Rights

At GE Appliances, we strongly believe that it is our responsibility to protect human rights for the good of our employees, our communities and our business. We're committed to upholding laws and policies throughout our business operations and to help maintain an ethical supply chain.

- We abide by all local employment laws concerning pay, benefits and working conditions, and compensate our employees fairly and with great respect for their time, talents and commitment.
- We support the United Nations Universal Declaration of Human Rights, which is grounded in the belief that "all human beings are born free and equal in dignity and rights."
- We respect the communities in which we do business, making responsible decisions in the use of GEA resources and honoring the rights of local citizens.
- We provide fair working conditions and prohibit all forms of child labor, human trafficking and slavery—including involuntary, forced or prison labor.
- We expect all GEA suppliers, contractors and consultants to respect and honor internationally recognized human rights laws and provide safe, fair working conditions.
- We comply with environmental and health and safety laws.
- We are members of the UN Global Compact.

#### Did you know?

GEA has a dedicated Global Trade Control team that oversees compliance of import and export transactions.

#### Help Protect the Environment

At GE Appliances, we're taking active strides to reduce our environmental footprint, demonstrate good citizenship, and help our owners do the same.

Throughout our supply chain, we're always looking for a better way to minimize waste, reduce our carbon footprint and pave the way to a more sustainable future. Here are a few of the steps we're taking to create more environmentally-conscious products and manufacture them in a way that is better for our planet.

#### Reducing the Impact of Our Operations

- We follow all environmental protection laws that apply to our business and operations.
- We install, maintain and monitor environmental controls to ensure that any emissions meet legal limits.
- We assess the environmental risks of all new activities, whether designing a new product, adding a new process or building a new factory.
- We analyze and optimize energy needs in our factories, assess and continuously improve the efficiency of our supply chain.
- We recycle metal, plastic and cardboard in our manufacturing facilities.

#### **Making Our Products More Sustainable**

- We evaluate environmental impact throughout all phases of a product's lifecycle, seeking ways to optimize the resources used to manufacture, package, distribute, use, repair and recycle our appliances.
- We stay ahead of advances in technology to minimize water use and energy consumption, while integrating features that make life easier and simpler for our owners.
- We hold our suppliers accountable for traceable and responsibly-sourced raw materials used in our products.
- We require all of our suppliers to adhere to our restricted materials list and report on banned, restricted and monitored substances of concern.
- We have more than 550 ENERGY STAR® certified appliances.
- We create new features, like eWash, to help save owners time, energy and money.

#### Serve Our Communities

We believe that when our business thrives, so should the communities where we live and work. It's our responsibility to make a difference beyond the walls of GEA, and we do this by being proactive and empowering our employees to do the same.

- We engage responsibly in political activities. GEA supports your right to engage in political activities and encourages you to advocate for things you believe in. Just remember, your political beliefs are your own and should be kept separate from your work with GEA.
- When participating in political affairs, make it clear that your involvement is not on behalf of GEA. Whether you're volunteering for a campaign or lending your time or resources to support a political party or candidate, all efforts must be made personally, with no affiliation to GEA.
- In dealings with the government, we must conduct business with all governmental representatives with the highest ethical standards and in compliance with applicable laws. This includes the special requirements associated with product performance and content requirements, regulatory filings and laws affecting lobbying and election campaign finance.
- Disclose board memberships and affiliations. We love to see our employees engage in community and industry efforts outside of their roles with GEA. We support those who choose to participate in boards and have parameters in place to ensure all board memberships and affiliations with nonprofits, organizations and trade associations, align with our policies and ethical commitments. We ask that all employees disclose information on board involvement through our <u>COI Disclosure Tool</u>.

#### Did you know?

You can log your personal and business volunteer hours: Visit <u>geappliances.benevity.org</u>

- Be mindful of personal vs. **GEA-related volunteer activities** and charitable giving. As inventors and makers by nature, our employees are always looking for ways to build stronger, more vibrant communities. The causes that matter to you inspire us. We encourage you to volunteer personally and/or through GEA. Just remember-all volunteer activities you choose to participate in must be lawful and should never create a conflict of interest with your work at GEA. Personal volunteer activities should never involve the company's name, resources or funds, without prior approval from our Corporate Citizenship team.
- Charitable giving is one of the most meaningful ways we can invest to build stronger communities. It's our goal for GEA employees to help us increase our impact by participating in our Employee Giving Campaign, as well as contributing to causes that are special to them. However, we do expect that personal charitable endeavors will be made using your own time, funds and without the use of company assets.

#### Learn More

- GEA 2020 Citizenship Report
- GEA 2021 Citizenship Report



# 03

# Additional Resources

Key Contacts & Links



# **Key Contacts & Links**





**Questions?** Please send an email to <u>code.ethics@geappliances.com</u>

Career Information: careers.geappliances.com

Media Inquiries: media@geappliances.com



# Thank you for joining us in our commitment to always make good decisions.

#### **About GE Appliances**

Born in the U.S. and backed by the world's largest appliance brand, we're the fastest-growing appliance manufacturing company in the U.S., with more than a century of industry experience.

We build the world's best appliances that are in half of all U.S. homes, and we contribute to local economies in every state. With our global headquarters located in Louisville, Kentucky, our 16,000 employees create, design, build, deliver and service the most trusted and innovative products that make life better for the owners, customers and communities we serve. At GE Appliances, we build 2,333 units per hour, deliver an appliance every 4.5 seconds and ship 28.1 million parts and accessories.

#### Resources

Visit Our Corporate Website: geappliancesco.com Follow Us on Social Media!



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