# OUR CODE. URPROMISE **GE APPLIANCES** a Haier company





A message from

## **KEVIN NOLAN**

President & CEO, GE Appliances

We have made tremendous progress since June 2016 standing up GE Appliances as the North American arm of Haier. The systems, processes, Values, Guiding Principles and Purpose that we've created will help us achieve our goal of industry leadership. We are building on that strong foundation in our second year, taking action to make the owner boss and transform GEA to accelerate our growth and leadership and achieve our Purpose: **To Enable Happiness and Wellbeing in Every Home**.

Fulfilling our Purpose and business goals requires that we manage certain business risks and operate our business with the highest levels of compliance and integrity. Our Code of Conduct provides the underlying framework and a common sense approach for how we conduct business and manage these risks.

I am proud of our legacy of operating with integrity. Upholding the highest standards in all of our business interactions is essential to achieving a competitive advantage. We cannot accept any less from ourselves or each other. That includes maintaining an open environment where everyone is free to ask questions and raise concerns.

In situations involving a gray area, we want employees to use common sense and ask themselves:

- What's the right thing to do?
- How would my action or decision look to others?
- Could my action or decision withstand public or government scrutiny?
- Is my action or decision consistent with the GE Appliances Code of Conduct?

I expect each of you to be informed, understand the risks associated with your job, raise questions, and use your best judgment in making business decisions.

Kevin Nolan

President and CEO, GE Appliances, a Haier company



## OUR CODE IS OUR PROMISE

GE Appliances Code of Conduct and Policies

#### **PREAMBLE**

#### Who must follow our Code?

Our Code applies to all GE Appliances employees, officers, and members of the Board of Directors, subsidiaries and business partners, including third parties who can have a direct impact on our reputation through their behavior. We expect and encourage all our contractors and their employees to act in a way that is consistent with our Code. We will take appropriate measures where we believe they have not met our expectations or their contractual obligations.

In addition to the Code and Policies, the above are also responsible to follow any implementing procedures and compliance guidelines issued by the Compliance Review Board or the various business functions with lead responsibility for the area covered by the Policy.

IMPORTANT: This document is not an employment contract and GE Appliances does not create contractual rights by issuing it.

## OUR CODE OF CONDUCT

We act with integrity and promote a culture of compliance in performing our jobs

We obey all laws and regulations and deal honestly and openly with governments

We make the interests and needs of product owners top priorities and invest in our communities

We compete in the global marketplace using ethical business practices

We respect our fellow employees and maintain a safe and professional workplace

We protect Company intellectual property and respect that of others

We conduct our operations with due respect for the environment

#### **COMMON SENSE RULES TO REMEMBER**

- 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 that affect your job
- Conduct government business with the highest ethical standards and in compliance with applicable laws
- Compete fairly and provide fair treatment to our customers and suppliers
- Do 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 diversity in employment decisions
- Comply with workplace health, safety and environmental protection laws
- Protect Company intellectual property (patents, trademarks, etc.) and secure access to our networks, devices, systems and business confidential information

# All GE Appliances employees will acknowledge the following:

- 1. I confirm that I have read and understand the Code of Conduct and Implementing Policies and agree to comply with my obligations therein.
- 2. I understand that I am obligated to raise any questions and to promptly report concerns about compliance with laws, regulations or the Code and policies.
- 3. I will contact a manager, Business Compliance Leader, Legal Counsel, Human Resources, EHS or Finance representative or the Ombuds Network if I wish to remain anonymous, or when I have questions or concerns.
- 4. I understand that GEA prohibits retaliation for raising concerns and that concerns will be promptly investigated by impartial employees.



# We act with integrity and promote a culture of compliance in performing our jobs

#### **PROMOTING A COMPLIANCE CULTURE**

Ours is an open culture where asking questions and raising concerns are encouraged. We commit to the timely investigation and resolution of all concerns and reports of possible violations. We are committed to supporting our people in honoring their responsibilities under this Code. All GEA employees are expected to know and comply with this Code in the course of their work.

You can raise a concern or pose a question through any of the following channels:

- 1. In-person, by contacting your supervisor, Business Compliance Leader, HR leader, persons in Finance or Legal, EHS, or an Ombuds person.
- 2. Submit a concern through the Concern Reporting Managers tool, available on the GEA Today Homepage, My Links, "C".
- 3. Anonymously, via the Ombuds icon on your desktop, the GEA Homepage My Links "O" Ombuds Portal, or through the toll-free hotline at 1-866-585-1263.
- 4. Text message (North America only) To report an anonymous message, open a new text message on your cell phone, and enter "274637" in the "To" field, then start your text with the word OMBUDS followed by a space in the body of the message.
- 5. GEA's Secure Avenue for Everyone (SAFE) tool anonymously report concerns directly to your Ombuds person from any computer at any time via ombuds.geappliances.com.

We do not tolerate retaliation against anyone raising a concern regarding this Code of Conduct or any law or regulation. Retaliation claims can be made to the above compliance resources or directly to the Compliance Review Board, a committee created by the GE Appliances Board of Directors to oversee resolution of such claims and to enforce this Code of Conduct.

We maintain a comprehensive program to educate leaders and employees on this Code of Conduct and their obligation to speak up when they are concerned about a possible violation of law, to cooperate fully in investigations of misconduct and to act with and foster an open environment where compliance is integral to success.

We will be truthful and honest in all statements made in performing our jobs, including when preparing Company reports and documents of any kind, from expense reports to Company financial statements. Not only do false statements breach this commitment, they may also be illegal and carry severe consequences for both the Company and the individual employee.

#### INTEGRITY IN FINANCIAL REPORTING

Our accounting and reporting will faithfully reflect the Company's business activities consistent with generally accepted accounting principles, standards, and regulations for accounting and financial reporting.

- We will prepare timely, accurate and complete financial information for use in reports to the board, management, regulators and other stakeholders.
- We will ensure that management decisions are based on complete facts and sound economic analysis with appropriate consideration of short- and long-term risks.
- We will comply with all Company document retention policies and applicable laws and regulations relating to the preservation and proper disposal of documents and records.
- We will take care that all expenditures are reasonable and appropriate under Company guidelines and secure physical property and protect digital assets from misuse and loss.

#### **AVOIDING CONFLICTS OF INTEREST**

We are expected to act in the Company's best interests and avoid situations that create actual or potential conflicts of interest. A conflict of interest arises when a personal or family interest interferes with our ability to make sound, objective business decisions on behalf of the Company. Despite the best of intentions, even the appearance of a conflict can be harmful to the Company. We all have a duty to disclose actual or potential conflicts of interest using the tools the company has provided.





## We obey all laws and regulations and deal honestly and openly with governments

## UNDERSTANDING LAWS AND REGULATIONS THAT AFFECT OUR JOBS

Each of us is responsible for knowing and complying with the laws and regulatory requirements that affect our job responsibilities and to escalate any potential issues that may lead to a breach of laws or failure of regulatory compliance. Subject matter experts and other resources are available to help.

We will comply with all export control, economic sanctions and customs laws that regulate cross-border transfers of goods and technology.

We are committed to complying with applicable anti-money-laundering, corruption and terrorist financing laws and regulations and have established processes to assure compliance. For this reason, we conduct business only with customers involved in legitimate business activities, with funds derived from legitimate sources.

#### **WORKING WITH GOVERNMENTS**

In dealings with the government, we must conduct business with all governmental representatives with the highest ethical standards and in compliance with applicable laws, including the special requirements associated with product performance and content requirements, regulatory filings and laws affecting lobbying and election campaign finance. We must coordinate with business experts when working with or responding to requests from regulators. Doing business with the government is different from business dealings with commercial customers—do not pursue government sales without coordinating with the Government Sales Center.





### We make the interests and needs of our product owners top priorities and work to make our communities better

#### **CONSUMER SATISFACTION**

Our products are at the heart of the home. We make products that make life easier for product owners and we are dedicated to design and manufacture a broad range of products that enhance the quality of their lives.

We make product safety a priority in all aspects of the product lifecycle and ensure ongoing compliance.

#### **PROTECTING CONSUMER PRIVACY**

We protect the privacy of product owners and take care that personally identifiable information is appropriately safeguarded. We provide product 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 action.

Consult with the Privacy Committee or your function's Privacy Manager or Business Compliance Leader before requesting access to consumer data or implementing new or significantly modified processes that use it, including new software.

#### **INVESTED IN OUR COMMUNITIES**

Our people are part of the communities we call home. We are committed to and value our tradition of community involvement by providing financial and product donations, volunteering our business and technical knowledge to charitable institutions and our time on community development projects that help our neighbors and make their lives better.



# We compete in the global marketplace using ethical business practices

#### **FAIR COMPETITION**

Antitrust and competition laws are designed to protect the free market by prohibiting unreasonable restrictions on competition. Mindful of the severe consequences to the Company 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.

#### **CUSTOMER AND SUPPLIER RELATIONSHIPS**

We base our relationships with customers and suppliers on lawful and fair practices. Our customers, who help us build relations with people who purchase our products, are critical to our success. Part of building strong relationships is according similar treatment to similar customers.

We provide suppliers a fair opportunity to do business with us, including small businesses, and businesses owned by the disadvantaged, minorities, women and disabled veterans.

We only do business with suppliers that comply with all applicable legal requirements relating to labor, employment and environment, worker health and safety laws and norms.

#### **ANTI-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.

#### **CUSTOMER AND SUPPLIER INFORMATION**

We make every effort to safeguard information, including confidential and proprietary information and personal data, of customers and suppliers, and maintain systems to protect such information.

## We respect our fellow employees and maintain a safe and professional workplace

#### PROMOTING A DIVERSE AND RESPECTFUL WORKPLACE

Our employees are our most valuable asset. The Company is committed to a work environment where each employee is treated fairly and with respect, and where every employee is given an equal opportunity to succeed.

We are committed to creating, managing and valuing diversity in our workforce. 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's status, other characteristics protected by applicable law, and physical or mental disability, where we make reasonable accommodations when appropriate.

We also are committed to ensuring that our workplace is free from 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.

#### MAINTAINING A SAFE AND HEALTHY WORK ENVIRONMENT

We are committed to maintaining a safe and healthy work environment. We provide reasonable measures to limit access to workplaces and to secure them from uninvited visitors or others seeking to harm our employees or facilities. 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 workplaces. Possessing, using, selling, distributing or manufacturing illegal drugs or controlled substances on Company premises or by anyone conducting Company business is strictly prohibited.

We comply with all applicable workplace health and safety laws, including when operating Company and personal vehicles, follow all posted safety and emergency procedures, including reporting any unsafe conditions or activities.

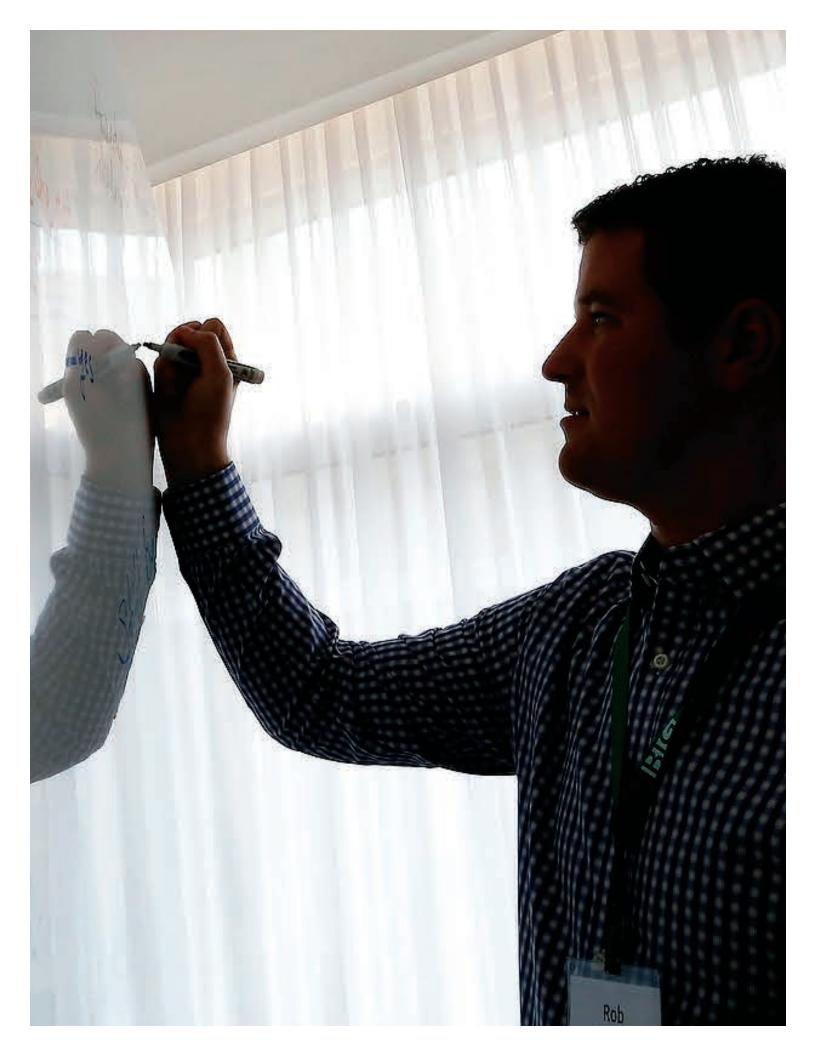
#### PROTECTING EMPLOYEE PRIVACY

We respect employees' privacy rights and will use, maintain and transfer personal and medical data only as permitted and protect it from unauthorized disclosure in accordance with the Company's standards, procedures and local laws.

It is our policy to use information only for legitimate purposes and to maintain appropriate access controls and endeavor to protect our networks, systems, devices and information in our possession.

Consult with HR and Privacy Counsel before implementing new or significantly modified processes that use Personal Information, including new software.





## We protect Company intellectual property and respect that of others

#### **INTELLECTUAL PROPERTY**

The products, the digital and logistics systems that we create are the heart of our business. Our Company's intellectual property (material protected by copyright, trade and service marks, patents and trade secrets) result from huge financial expenditures and the dedication and effort of our employees. We are committed to protecting our intellectual property and respecting the intellectual property rights of others. You may not disclose Company intellectual property without authorization, unless such disclosure is made in accordance with federal law.

#### **CYBER SECURITY**

We will protect our networks, systems, devices and information in our possession, not download or copy written or digital materials without authorization and to maintain appropriate access controls, conduct security assessments on our products prior to release and monitor for cyber security threats and vulnerabilities.

We limit access to Company information to authorized individuals who need it for legitimate business purposes.







# We conduct our operations with due respect for the environment

#### **RUNNING OUR OPERATIONS**

We strictly comply with all environmental protection laws that apply to our operations. That's why we install, maintain, and monitor environmental controls to ensure that any emissions meet legal limits.

We assess the environmental risks of any new activity, whether designing a new product, adding a new process or building a new factory.

#### **OUR PRODUCTS AND THE ENVIRONMENT**

We adhere to regulations that prohibit the use of banned substances in our products and go further by tracking substances of concern and limiting their use where alternatives are reasonably available. We are committed to minimizing impact on the environment throughout the life cycle of our products, including, where practicable and cost effective, consideration of end-of-life management as we design them.

These principles apply to everything we do—from making and servicing products to driving vehicles and managing waste.







