



**OUR SHARED COMMITMENT**  
GLOBAL CODE OF CONDUCT



## A MESSAGE FROM AGCO'S CHAIRMAN, PRESIDENT AND CEO

### DEAR AGCO COLLEAGUES,

It's an exciting time to be part of AGCO. Together, we're leading an agricultural revolution, with smart farming innovations that are not only yielding better crops, but a better, more sustainable world. I'm proud of our employees, our AGvance strategy, our world class brands, the work we are doing together and the difference we're making, but what gives me the greatest pride is that we never lose sight of where we started, with a deep respect for our customer, putting our farmers at the heart of everything we do.

Our Global Code of Conduct reflects our farmer-focused commitment.

It helps us put our Purpose and Vision into practice every day and guides our behavior on the job, wherever we may be. It doesn't cover every issue we may encounter at work — no code could do that — but it does provide us with the tools and resources we need to navigate everyday workplace challenges.

Our open-door environment means there are people who can help you when you have questions, and our anti-retaliatory culture means you can come forward and share concerns without fear. Look to the Code as your source for how you treat your colleagues, making business decisions ethically and upholding our high standards.

On behalf of AGCO's Board of Directors, I thank you for your continued dedication to AGCO's success and *Our Shared Commitment*.

*Eric Hansotia*

#### Eric P. Hansotia

Chairman, President and Chief Executive Officer



#### Our Code

expresses the commitment we make and the approach we take to doing business ethically and with integrity, around the globe.



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## POLICIES AND RESOURCES





# YOUR RIGHTS AND RESPONSIBILITIES

It's not enough just to know what's right. It's about doing what's right. It's also about speaking up when something stands in the way of our shared commitment to doing business the right way and treating our colleagues the right way. It's not always easy, but it's the only way to build a better AGCO, a better set of solutions for farmers, a better future for agriculture and a better tomorrow for everyone. Our culture focuses on:

**FARMER FIRST:**

I put farmers' success at the heart of everything I do.

**SPEAK UP:**

I raise challenging topics openly and debate respectfully.

**TEAM UP:**

I maximize AGCO's results through teamwork and aligned actions.

## YOUR RIGHTS AND RESPONSIBILITIES

**A. WHO MUST FOLLOW THE CODE**

This Code summarizes the principles for our business conduct and ethical behavior. All employees, officers and directors of AGCO and its subsidiaries are responsible for knowing and following the Code. Failing to comply with the Code may lead to disciplinary action, up to and including termination.

AGCO also requires its majority-owned affiliates and specific joint ventures to adopt this Code and even encourages non-controlled affiliates to adopt and follow it. AGCO may provide consultants, agents, sales representatives, distributors and independent contractors with a copy of this Code and encourage them to agree to comply with relevant aspects of it. The Company may take action, and even terminate the relationship, if one of those third parties does not comply with this Code.

**Key Point**

If there are **conflicts between this Code and any collective bargaining agreement in effect for represented employees, the collective bargaining agreement will apply.**

Also, this Code should not be construed as, and does not create, an employment agreement between the Company and any employee.

While AGCO is a U.S. company, we do business throughout the world, and our employees are citizens of many countries. As a result, our operations are subject to the laws and regulations of many countries, provinces, states, municipalities and organizations. Each of us is responsible for knowing and following the laws that apply to AGCO where we work.

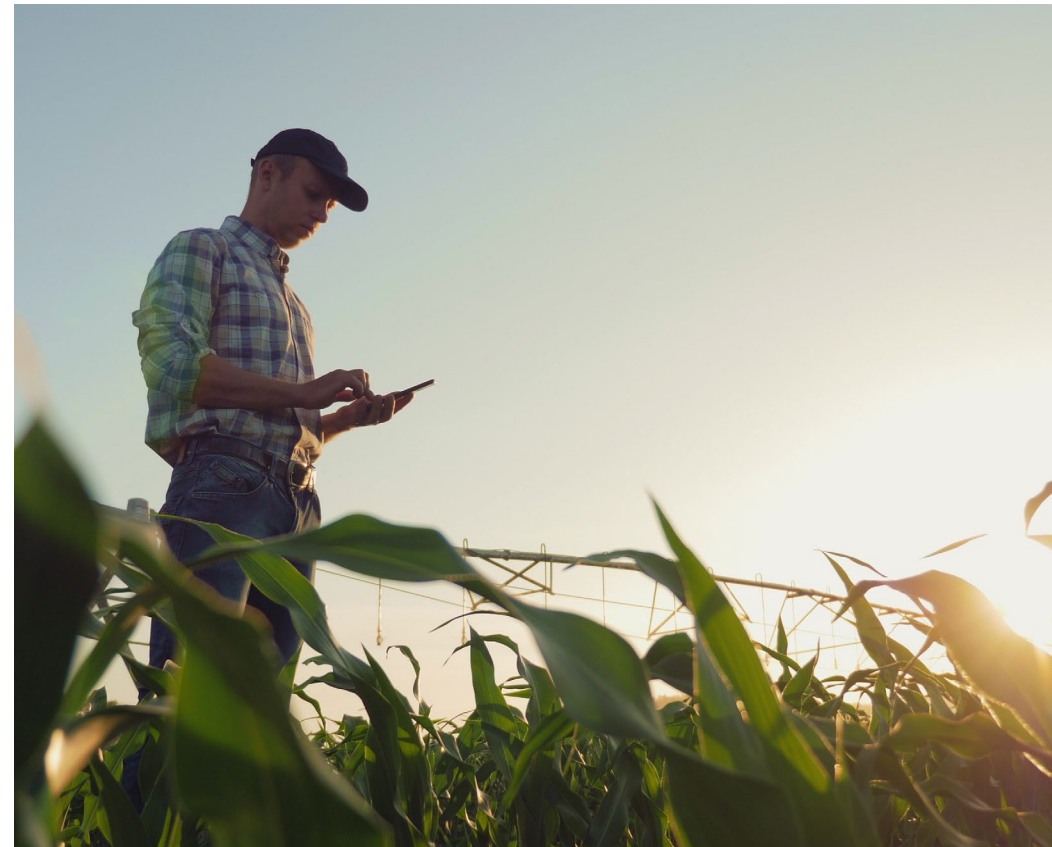
This Code establishes principles for our business conduct, regardless of location. Where differences exist between this Code and local customs, norms, laws or regulations, we are responsible for applying whichever guideline sets the highest standard of behavior. Sometimes, there may be a conflict between the laws of two or more countries. In that case, we should consult AGCO's [Chief Ethics and Compliance Officer](#) to understand how to resolve that conflict properly.

**ACCOUNTABILITY**

We take responsibility for our area of influence as if this is our enterprise. We commit to excellence.

**B. RELATIONSHIP OF THE CODE TO LAWS, REGULATIONS AND AGCO POLICIES**

To implement the standards of conduct we are expected to follow, AGCO has adopted a number of more specific policies in addition to the Code. Some of those policies are referenced later in this Code, while others may be specific to a location or a functional area at AGCO. Please be mindful that we are expected to comply with all AGCO policies as well as this Code.



YOUR RIGHTS AND RESPONSIBILITIES

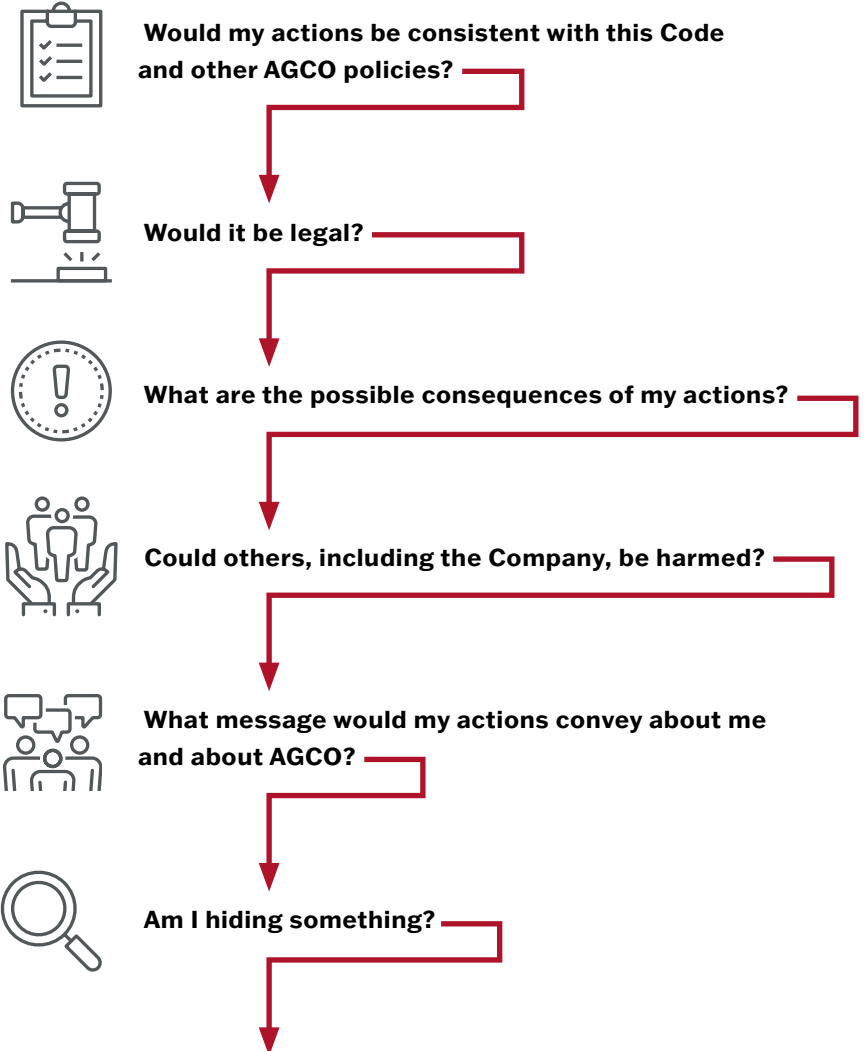
C. OUR PERSONAL COMMITMENT TO MAKING THE RIGHT DECISIONS

Each of us must commit to following the principles contained in this Code, and we may be asked to acknowledge that commitment on a periodic basis. We are also responsible for raising concerns about possible violations of the law, this Code or other AGCO policies.

Although our Code is a guide, it is not a substitute for sound decision making. If the Code does not cover an issue or answer a question, we should use good judgment and common sense when deciding upon a course of action. Stop and think before proceeding.



When faced with an ethical dilemma or a situation where the right choice may not be clear, ask yourself:



Remember that there are many resources available at AGCO. Often, we are better off discussing issues with others before making a decision.

## YOUR RIGHTS AND RESPONSIBILITIES

**D. HOW TO ADDRESS ISSUES AND RAISE CONCERNS**

Raise concerns early: The longer we wait to address an issue, the worse it may become. There are many resources available to answer questions and address concerns about potential violations of the law, this Code or other AGCO policies, including:

- AGCO's [Chief Ethics and Compliance Officer](#)
- Our immediate supervisors
- Anyone in our department's chain of command
- AGCO's Alertline: Administered by an independent third party and available 24/7, you may contact the Alertline via:



Web: <https://secure.ethicspoint.com/domain/media/en/gui/83584/index.html>



Phone: Phone numbers and dialing instructions for your location are listed at <https://secure.ethicspoint.com/domain/media/en/gui/83584/phone.html>.

AGCO will treat reports as confidentially as possible and will share the information only as necessary to facilitate a prompt and thorough investigation of our report.

**Key Point**

Depending on where you are located, you may make a report on an anonymous basis.

**Local laws vary regarding anonymous reports.** When you call AGCO's Alertline, the independent third-party administrator will ask where you are located. Your location will determine whether your report may be made anonymously.

**E. AGCO'S ANTI-RETALIATORY CULTURE**

Raising or helping to address an integrity concern takes courage. AGCO will not tolerate retaliation against anyone for reporting or providing information that he or she reasonably believes relates to a violation of law, this Code or AGCO policies. Retaliation is grounds for discipline, up to and including dismissal.

**What If?**

**Q:** *One of my co-workers recently raised a safety concern with our supervisor, and I've noticed that she's been treating him differently ever since, by criticizing him a lot in front of other people, "forgetting" to include him in staff meetings, things like that. Is she retaliating against him?*

**A:** Possibly, but it's not your responsibility to determine whether her actions rise to the level of retaliation. It is your responsibility to inform AGCO about your supervisor's behavior, however, since you suspect she may be violating the Code. Please contact the Company through one of the channels described in **"How to Address Issues and Raise Concerns."**

AGCO takes reports of retaliation very seriously and will investigate your report promptly and thoroughly, maintaining the confidential nature of what you share to the extent possible. Depending on where you are located, you may also make an anonymous report.





## YOUR RIGHTS AND RESPONSIBILITIES

### F. SUPERVISOR RESPONSIBILITIES

Supervisors have certain additional responsibilities related to this Code and the standards of behavior at AGCO. As supervisors, we should:

- *Make our own personal commitments to ensure that our units operate in accordance with the highest principles of business ethics.*
- *Ensure that our employees receive a copy of this Code.*
- *Periodically discuss the Code with our employees and review their knowledge and understanding of it.*
- *Stress to our employees the need for continuing commitment to the Code.*
- *Model the appropriate ethical behavior.*
- *Maintain a workplace environment that encourages frank and open communication.*
- *Support employees who may raise issues or concerns and never allow anyone to retaliate against them for their courageous actions.*



#### INTEGRITY

We walk the talk. We are committed to a consistent, honest and reliable way of action.

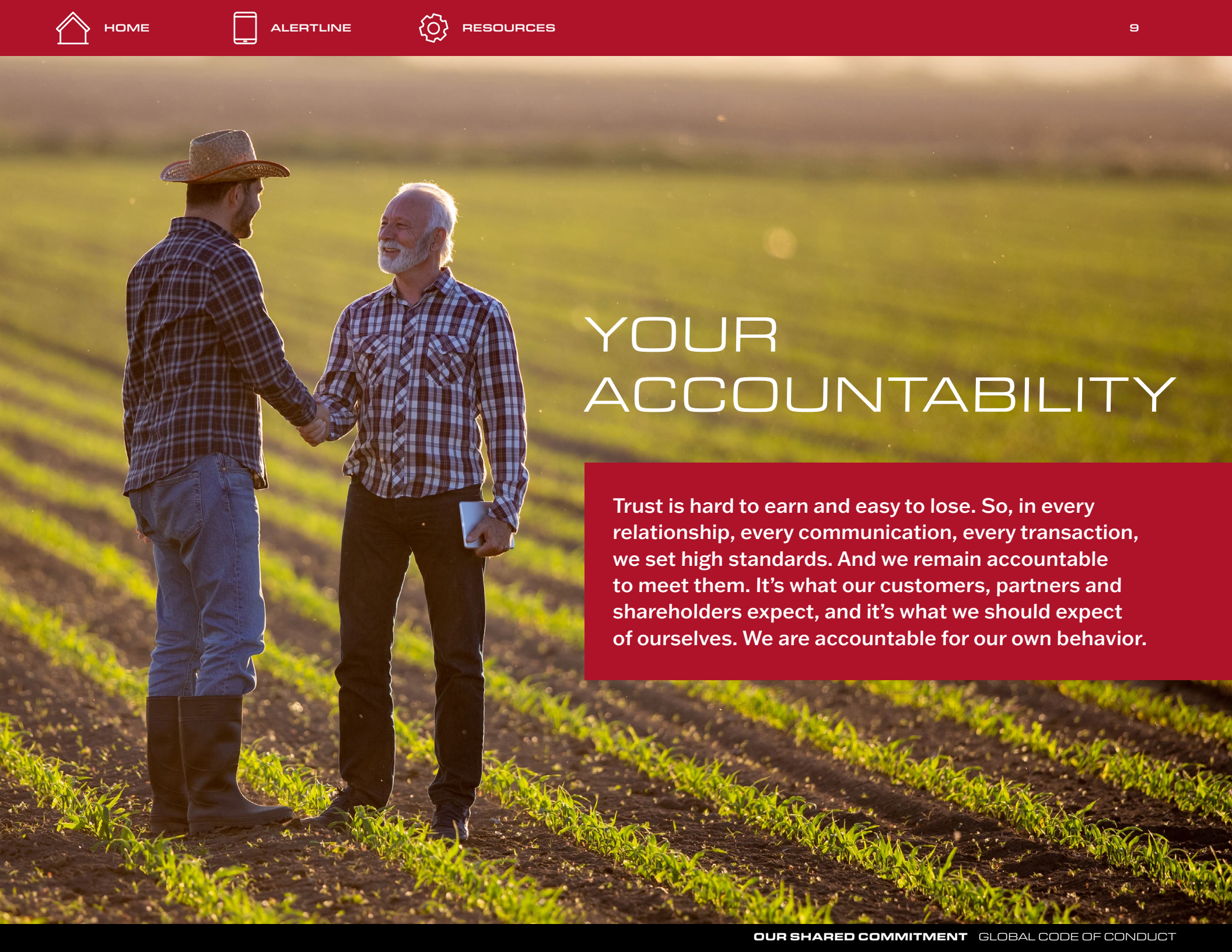
### G. CODE OVERSIGHT AND WAIVERS

AGCO may modify, change or alter any portion of this Code at any time. The Company will communicate significant changes to employees, and the Code will be updated on the Company's website.

In the rare circumstances where a waiver of the Code may be appropriate, waivers for executive officers will be considered by the Audit Committee of the Company's Board of Directors, and waivers for any other employee will be considered by AGCO's [Chief Ethics and Compliance Officer](#).







# YOUR ACCOUNTABILITY

Trust is hard to earn and easy to lose. So, in every relationship, every communication, every transaction, we set high standards. And we remain accountable to meet them. It's what our customers, partners and shareholders expect, and it's what we should expect of ourselves. We are accountable for our own behavior.

## YOUR ACCOUNTABILITY

### A. WE RESPECT EACH OTHER

At AGCO, we recognize that there is strength in our differences. We grow as individuals and as a company when we take the time to learn from one another, listen to different points of view and treat each other with mutual respect.

A diverse workforce helps us expand our skill sets, our knowledge base and our sensitivity to others' needs. Our customers are as diverse as we are, and we become a stronger global company when we better understand their circumstances and their points of view.

### B. WE DO NOT TOLERATE DISCRIMINATION OR HARASSMENT

Discrimination and harassment will not be tolerated at AGCO. We comply with the laws and regulations that provide for equal opportunities in employment, without discrimination or harassment on the basis of race, religion, color, national origin, ethnicity, sex, gender, gender identity or gender expression, age, disability, veteran status, sexual orientation, religion, family status, social origin or any other status protected by law.

Do your part to keep our workplace free from intimidation, harassment, bullying and abusive conduct. Think before you act or speak, and consider how your behavior would make others feel.

#### **Want to Know More?**

For additional information, please consult the anti-discrimination, equal employment opportunities or anti-harassment policies that may be applicable to your location.



#### Key Point

**Harassment can take many forms,** such as:

- Inappropriate physical contact including, for example, an unwanted “innocent” neck massage
- Derogatory comments or name-calling based on a person’s appearance, ethnicity or orientation
- Hostile, threatening or abusive behavior
- Offensive jokes, drawings, photos or emails, regardless of the intended audience

### C. WE CARE ABOUT SAFETY

Nothing is more important to AGCO than the safety and health of each employee and ensuring employees return home injury-free each day. In the interest of maintaining a safe and healthy workplace, we must all:

- *Conduct business in a way that protects each other, reporting any situation that may pose a health or safety risk.*
- *Maintain a neat, safe working environment, keeping aisles and workspaces free from obstacles, wires and other potential hazards.*
- *Wear personal protective gear when required.*
- *Know and comply with the safety and health requirements that apply to your job as well as applicable occupational health and workplace safety rules and industrial hygiene standards mandated by law.*

AGCO expects employees to be ready to carry out their work duties — never impaired. You must not use, possess or be under the influence of illegal drugs or any substance that could interfere with preserving a safe and effective work environment.

Workplace violence is not tolerated at AGCO, and weapons are prohibited in our facilities — any threats or violent behavior (including hostile behavior, inflicting physical injury or acts of vandalism) should be reported immediately.

#### **Want to Know More?**

For additional information, please see our Health and Safety Policy on InsideAGCO.



#### Key Point

As with any standard described in this Code, you are responsible for promptly **reporting health or safety or human rights violations** at AGCO.

Safety starts with you. Report accidents, unsafe conditions and potential unsafe conditions as soon as you become aware of them.

## YOUR ACCOUNTABILITY

**D. WE ACT RESPONSIBLY**

## GIFTS, ENTERTAINMENT AND HOSPITALITY

Our business decisions must be made solely on the basis of quality, service, price and similar competitive factors. We should avoid any decisions that are influenced by business courtesies or which give the appearance of such an influence.

From time to time, AGCO employees may offer or accept customary or modest business courtesies in connection with legitimate business discussions. While it is difficult to define “customary” and “modest” without stating a specific amount, common sense and reasonableness should dictate whether a gift or form of entertainment or hospitality would be considered extravagant or excessive.

You must not offer or accept anything that would influence or appear to influence the exercise of independent judgment in pursuit of the best interests of AGCO. All of our business dealings must be on arms-length terms and free of any favorable treatment resulting from the personal interest of our employees.

If offering or receiving a gift or a form of entertainment or hospitality could be construed as an improper inducement to perform services for the benefit of AGCO, it is not permitted. Gifts such as routine AGCO souvenir items are permitted to be offered to our customers and suppliers in accordance with AGCO procedures.

As discussed in more detail in the [We Do Not Tolerate Bribery](#) section, employees are strictly prohibited from offering or providing anything of value to government officials.

**Key Term**

A **business courtesy** is any form of gift, entertainment or hospitality for which the recipient does not pay fair market value.

**What If?**

**Q:** A contact at one of AGCO's largest vendors has invited me and several of my AGCO colleagues to join her for dinner at an expensive steakhouse before attending a concert at a nearby arena in the vendor's luxury suite. Are we allowed to accept the vendor's invitation?

**A:** The steakhouse dinner combined with the tickets to the concert could be considered lavish and extravagant, and could be construed as an improper attempt by the vendor to gain or retain AGCO business. Although we are sometimes permitted to offer or accept gifts, entertainment or hospitality that is modest and relevant to AGCO business discussions, depending on the circumstances, this vendor's offer could be considered exceptional. Before offering or accepting invitations such as this one, you should discuss the situation with your supervisor or seek guidance from AGCO's [Chief Ethics and Compliance Officer](#).

**Want to Know More?**

For additional information, please consult the AGCO Corporation Anti-Corruption Compliance Program Manual which is located on the Global Compliance site on InsideAGCO.



## YOUR ACCOUNTABILITY

## CONFLICTS OF INTEREST

Each of us has an obligation to perform our work for the Company effectively and objectively. We should avoid any situations or actions that could give rise to a conflict of interest or the appearance of a conflict of interest.

An actual or apparent conflict of interest may arise in many ways, including by:

- Having **ownership of, or an interest in, a competitor or a business with which AGCO has or is contemplating a relationship** (e.g., suppliers, customers, landlords, distributors, licensees/licensors, etc.)
- Having any **business, financial or other relationship** with suppliers or competitors that could impair, or even appear to impair, your independent judgment on behalf of AGCO
- Profiting or assisting others in **profiting from confidential information or business opportunities** that are available because of your role with the Company
- Serving as an **employee, director, officer, partner, agent or consultant at a current or prospective competitor, supplier or customer**
- **“Moonlighting” or providing services to another business** as an officer, director, employee, agent, representative or consultant where your participation could detract from your duties at AGCO
- Devoting work hours or AGCO resources to **activities other than those related to your role** at the Company
- **Influencing or attempting to influence any business transaction** between the Company and another entity in which you have a direct or indirect financial interest
- **Unauthorized selling, trading or bartering of merchandise** to others on Company premises or Company time



## Key Term

**Conflicts of interest** occur whenever our own personal interests — or the interests of our family members — interfere with or appear to interfere with the interests of AGCO.

- **Taking opportunities that are discovered through your role at AGCO for personal gain**
- **Distributing personal notices, pamphlets, advertising matter or any other kind of personal literature during work time or in any work area**
- **Participating in or soliciting for gambling, lotteries or any other game of chance**

Disclosure is the key.



## YOUR ACCOUNTABILITY

### CONFLICTS OF INTEREST continued

If you believe that you or a member of your family may have an interest that could interfere with your role for AGCO, you should discuss the situation promptly with your supervisor or AGCO's [Chief Ethics and Compliance Officer](#) to receive guidance on how best to proceed.

In many cases, the interest, relationship or transaction you disclose will not be considered harmful to the Company, and you may be allowed to pursue it. But by raising any potential conflicts of interest to your supervisor or to AGCO's Chief Ethics and Compliance Officer, you help advance AGCO's reputation for honesty, integrity and fair dealing.

If you are a supervisor at AGCO, you play a crucial role in helping the Company manage actual and apparent conflicts of interest. If an employee discloses a potential conflict to you, you are responsible for discussing the situation with AGCO's Chief Ethics and Compliance Officer and subsequently providing guidance to the employee on how he or she can best address the issue.

When in doubt, reach out for assistance and help us ensure that we avoid any conflicts of interest.



### TRANSPARENCY

We provide full information required. We communicate openly and sincerely. We appreciate feedback.



### What If?

**Q:** *My wife runs a business that provides information technology consulting services. When I mentioned her business to my colleague in IT, he expressed interest in having my wife's business do some work for the Company. Would this arrangement be okay?*

**A:** Probably not. The potential business relationship between your spouse and AGCO could be a conflict of interest, or at the very least, present the appearance of a conflict. By contracting with your spouse, AGCO may be providing an improper benefit to your spouse as a result of your role with the Company. You should disclose the arrangement to your supervisor or to AGCO's Chief Ethics and Compliance Officer who can then provide you with guidance on the proper course of action.



## YOUR ACCOUNTABILITY

**E. WE ARE COMMITTED TO OUR CUSTOMERS**

AGCO competes on the basis of product quality and reliability, employee integrity and customer demand for our products and services, which are the best in the industry. We are in business to satisfy our customer's needs with products and services that provide the highest possible value. Remember, we put our farmers first.

Careful attention to quality not only enables us to meet customer specifications, but it also has a direct effect on our operating costs and profitability.

We are all responsible for delivering quality products and service to our customers and to drive continuous improvement, whether we work in the front office or on the production line. Never ignore a defect, deficiency or error no matter how small or obscure. Product quality issues can lead to future breakdowns, which would damage AGCO's reputation and weaken our competitive position.

**Key Point**

**Product inspection and testing** are key parts of our commitment to product quality and vitally important to our business.

Failing to perform inspections and tests required by contract is not only dangerous but also unethical.

It is also imperative to provide the necessary documentation in support of inspection and testing. And never misinform a customer or the public about the nature of the inspection and testing performed by the Company.

**F. WE TREAT OUR SUPPLIERS FAIRLY**

AGCO's relationships with subcontractors, vendors and suppliers are vital to our business. Our dealings must be fair, reasonable and consistent with all applicable laws and regulations as well as good business practices.

If you have any responsibility for choosing suppliers, make that choice ethically and objectively.

AGCO promotes competitive procurement to the maximum extent practicable. We exercise due diligence and employ the highest ethical business practices in source selection, negotiation, determination of awards and the administration of all purchasing activities. We expect our business partners to do likewise with respect to their subcontractors, vendors and suppliers. That expectation is outlined in the [AGCO Supplier Performance & Relationship Excellence \(ASPIRE\) guidelines](#).

**Key Point**

**Selection of subcontractors, vendors and suppliers** should be on the basis of objective criteria such as:

- Quality
- Technical excellence
- Cost/price
- Schedule/delivery
- Services
- Maintenance of adequate sources of supply

## YOUR ACCOUNTABILITY

**G. WE FOLLOW THE RULES FOR POLITICAL AND COMMUNITY ENGAGEMENT**

Corporate political activity, including political contributions and lobbying by AGCO, is heavily regulated and subject to special rules. Business units must consult with AGCO's [\*Chief Ethics and Compliance Officer\*](#) prior to making any political contribution, hiring a lobbyist or engaging in any lobbying activity.

AGCO encourages employees — acting voluntarily in their personal capacities, on their own time and using their own resources — to become engaged in their communities and in the electoral process at the local, state, regional and national level.

There are some basic rules to follow when it comes to personal political activities and involvement in your community.



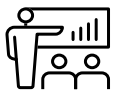
- > Do not use Company time, property, funds or equipment to carry out or support your personal activities — political or otherwise.



- > Always make it clear that your views and actions are your own and not AGCO's.



- > If you plan to seek or accept a public office, notify your supervisor in advance. Discuss whether your official duties might affect your work, and work constructively with your supervisor to avoid any adverse impact on carrying out your job responsibilities at AGCO.



- > Never pressure or coerce colleagues to support a political candidate or a political or charitable cause.



## YOUR ACCOUNTABILITY

**H. WE DO NOT TRADE ON INSIDE INFORMATION**

In our roles at AGCO, we may come across highly confidential information about our Company or about other organizations which is not yet available to the public. Non-public information that may affect a reasonable investor's decision to buy, sell or hold securities is considered "material inside information." As AGCO employees, we are prohibited under securities laws and AGCO policy from trading in the securities of a company while in possession of material inside information about that company.

In addition to our own legal obligation to avoid trading in securities based on material inside information, it is also against the law and AGCO policy to communicate or "tip" inside information to others, including our family members, friends or neighbors.

The ramifications of insider trading can be severe for both you and our Company, including significant fines, penalties and even imprisonment. If you ever have doubts or concerns as to the appropriateness of a securities trade, you should contact AGCO's [Chief Ethics and Compliance Officer](#) prior to trading. Likewise, certain employees are subject to additional insider trading requirements due to their roles at the Company and should confer with the Chief Ethics and Compliance Officer before trading in securities.

**Key Point**

Some examples of **material inside information** include:

- Research and development related to new products, services or business ventures
- Financial forecasts or unreleased results, such as revenue, profits and losses
- Potential acquisitions, divestitures or mergers
- Significant changes in management or Board oversight
- Legal or regulatory events, such as significant litigation, government investigations or potential fines
- New or lost contracts, suppliers, vendors or business partnerships

**What If?**

**Q:** *I learned this week from a contact at one of our biggest suppliers that his company is about to acquire another AGCO supplier. While I know I can't use this information to buy securities in our big supplier, can I tell my wife to invest?*

**A:** No. Your contact at AGCO's supplier has given you material inside information. As such, you are not only prohibited from trading in securities of that supplier, but you are also prohibited from communicating or "tipping" others to purchase that supplier's stock. Doing so would violate both securities laws and AGCO policy. Only after the information about the supplier's acquisition is released publicly can you or your wife purchase the stock.

**Want to Know More?**

For more information, please review AGCO's Insider Trading Policy which is located on the Global Compliance site on InsideAGCO.







# CORPORATE CITIZENSHIP

We understand the obligation we have — as a Company, as manufacturers and as members of the community — to not only follow the laws of the countries where we operate, but also to make a positive difference around the world, advancing initiatives aimed at feeding the world sustainably and in the best interests of our farmers and wider society.

## CORPORATE CITIZENSHIP

## A. WE ARE SOCIALLY RESPONSIBLE

Philanthropy is an integral part of our corporate culture. AGCO believes in making a positive difference in the world and engaging responsibly in charitable activities that benefit the communities where we live and work. We contribute funds, time and talent to support both AGCO-wide programs and local causes. We encourage (but do not require) employees to learn more and participate in the many initiatives we support.

AGCO also encourages employees to make a difference on a personal level as well, supporting charitable and civic causes that are important to them. Be sure any outside charitable activity in which you engage is lawful and consistent with our policies and that you participate on your own time and at your own expense.

**Want to Know More?**

For additional information, please visit the [Philanthropy](#) pages on our website.

**Key Point**

**The AGCO Agriculture Foundation (AAF)** supports a holistic approach to the prevention and relief of hunger and initiates programs to support food security and sustainable agriculture development in communities.

Efforts are focused on serving underserved communities around the world with resources to combat hunger and promote nutrition and health, agricultural education, community development and the ethical treatment of farm animals in the supply and value chain.

For more information, see the [AAF website](#).

## B. WE ARE COMMITTED TO THE ENVIRONMENT AND SUSTAINABILITY

We recognize that sustainable agriculture is fundamental to our shared future and is imperative for our farmers and our industry. We also recognize that climate change and extreme weather conditions can present perpetual challenges to the development and achievement of sustainability initiatives.

We are working to be a farmer's most trusted partner for industry-leading, smart farming solutions to help them sustainably feed our world, and we've developed a set of clear corporate commitments which are detailed in our Global Environmental and Climate Change Policy and include:

- *Product innovation – creating and investing in solutions that reduce agricultural equipment emissions, create environmental awareness, promote animal welfare and support practices that reduce farmers' carbon footprint*
- *Resource efficiency – implementing methods that reduce our own environmental footprint across our own operations, products and services*
- *Supply chain commitments – encouraging our supply chain partners to commit to shared principles*
- *Transparency in reporting – communicating with our Board, employees, regulators, customers, suppliers and other interested stakeholders to better understand and report on environmental requirements and initiatives*

**Want to Know More?**

For additional information, please see our Global Environmental and Climate Change Policy which is located on the Global Compliance site on InsideAGCO or visit the Sustainability page on our website.

**TEAM SPIRIT**

We actively contribute to overcome challenges as a team.

## CORPORATE CITIZENSHIP

## C. WE RESPECT HUMAN RIGHTS

AGCO is committed to respecting human rights and combatting all forms of slavery and human trafficking. Our commitment starts with those in our own operations and expands to include those in our global supply chain and in the communities where AGCO products and services are sold and used.

As a company, we strive for:

- *Conducting business in a way that respects the dignity of all people*
- *Promoting diversity, equal opportunity, non-discrimination and a workplace free from unlawful harassment and retaliation*
- *Complying with all applicable local health and safety laws and regulations*
- *Security for all employees*
- *Prohibiting child labor, human trafficking, slavery or any form of forced or involuntary labor*

We require our suppliers to comply with all applicable laws and regulations and to respect the human rights of their employees and the communities in which they operate. (For more information, see the [AGCO Supplier Code of Conduct](#)). We do not knowingly conduct business with any individual or company that participates in human rights abuses. And we encourage employees to come forward if they see or suspect human rights abuses in our operations or the operations of our suppliers.



## Want to Know More?

For additional information, please consult the modern slavery policies that may be applicable to your location and see our Global Human Rights Policy on InsideAGCO.



## Key Point

Our commitment to human rights extends to improving agricultural prosperity and supporting marginalized farmers and vulnerable populations in developing countries where our activities contribute to addressing adverse human rights impacts.

To learn more about our outreach, see our latest [Sustainability Report](#) and the [AAF](#) website.

## D. WE WORK RESPONSIBLY WITH GOVERNMENTS

When working with the government, AGCO abides by all applicable laws and regulations, particularly special requirements associated with government contracts and transactions.

If you have contact with government officials as part of your role at AGCO, or if asked to provide information in connection with a government or regulatory agency inquiry or investigation, you must:

- *Cooperate fully.*
- *Provide truthful and accurate information.*
- *Make sure AGCO's legitimate interests are protected.*

We should never mislead or attempt to obstruct a government or regulatory investigation. Likewise, neither AGCO nor our employees should ever retaliate against someone who cooperates with a government or regulatory agency.

Always seek advice from your supervisor or from AGCO's [Chief Ethics and Compliance Officer](#) before responding to a request for information from a government or regulatory agency.

Because of AGCO's heightened obligations when working with the government, it is critical that we adopt processes that help ensure that any reports, certifications, statements or proposals are current, accurate and complete and that contract requirements are adequately identified and communicated to the responsible parties.



## Key Point

AGCO must follow special rules when it comes to **recruiting or hiring government employees**. The Company cannot offer or discuss employment with someone who is currently working in a government position that has business with the Company or authority over business with the Company.

Even after individuals leave their government positions, there may be local restrictions on their ability to be employed in the private sector.

If in doubt, consult with AGCO's Chief Ethics and Compliance Officer.

## CORPORATE CITIZENSHIP

**E. WE COMPETE FAIRLY**

AGCO is committed to competing fairly, honestly and with integrity in all markets in which we operate. As employees, each of us is required to comply with applicable antitrust and competition laws. These laws are often complex and vary from jurisdiction to jurisdiction.

AGCO expects that you will not engage in any behavior or activities that could be considered anti-competitive. Such behavior could violate these laws or expose the Company to significant financial or reputational risk.

When in doubt, please consult your supervisor or AGCO's [Chief Ethics and Compliance Officer](#).

The appropriate gathering and use of competitive intelligence are important to AGCO's success. If you are ever offered a competitor's trade secrets or proprietary information, or if you have any question about the legitimacy of competitive information, you should immediately consult your supervisor or AGCO's Chief Ethics and Compliance Officer.

Likewise, as mentioned in the [We Respect Privacy and Confidentiality](#) section, you should be careful not to disclose proprietary information of AGCO to our competitors.


**What If?**

**Q:** *I am attending a trade association meeting later this year, and I expect that peers from several of AGCO's competitors will be in attendance. Am I permitted to speak with them?*

**A:** Conversations with contacts at AGCO's competitors may be permissible so long as those conversations do not pertain to AGCO business operations or involve sensitive or proprietary information. If a competitor tries to discuss things like pricing, territories, new products or other competitive or sensitive information, you should stop the discussion immediately and notify AGCO's Chief Ethics and Compliance Officer.

**Key Point**

Examples of **anti-competitive behavior** that we must avoid include:

- Entering into price fixing agreements with competitors
- Dividing customers, markets or territories with competitors
- Bid rigging with competitors
- Pressuring a dealer regarding resale prices for AGCO products
- Disclosing AGCO's trade secrets or proprietary information without authorization
- Using improper means to obtain competitive intelligence (including trade secrets or proprietary information)
- Agreeing to boycott a customer, supplier or region



## CORPORATE CITIZENSHIP

## F. WE DO NOT TOLERATE BRIBERY

AGCO has a long-standing policy prohibiting activities that could be construed as bribery or corruptive behavior. Bribery is defined as the direct or indirect offering, giving, demanding or receiving of an undue reward in order to influence the behavior of someone in government or to obtain a commercial advantage. Regardless of whether you are working with a government official or a private sector employee, bribery is strictly prohibited at AGCO.

Not only is bribery against Company policy, but it is also against the law. Most countries have laws that strictly prohibit bribing local or foreign officials, including the U.S. Foreign Corrupt Practices Act. A breach of any of these laws is a serious offense and could result in significant fines for AGCO and imprisonment for the individuals involved. These consequences are true even in countries where it may appear that payments to government officials or private sector employees are a normal part of doing business. In all cases, even the appearance of a violation of anti-bribery or anti-corruption laws could do significant damage to AGCO's reputation and negatively impact our global operations.

AGCO may sometimes partner with third parties who perform work on the Company's behalf as contractors, agents or distributors. You should be aware that the Company's anti-bribery and anti-corruption policies apply equally to these third parties. AGCO could be found liable for any potential violations of bribery or corruption laws by these third parties. As AGCO employees, we are all responsible for carrying out strong due diligence in selecting and monitoring the contractors, agents and partners with whom AGCO works.



## Key Point

**Government or public official** can include:

- Employees of a government or state-owned business
- Political candidates, parties or party officials
- Members of royal families
- Employees of government departments or agencies
- Employees of government-owned, joint-venture partnerships or government-owned banks (in certain countries)
- Individuals who are engaged contractually with any governmental entity



## What If?

**Q:** *My business unit works closely with agents and representatives in other countries to sell AGCO products and services. How can I ensure that these agents and representatives do not violate bribery or corruption laws?*

**A:** AGCO maintains a robust set of policies, processes and controls, which have been developed over many years. Any business with agents, representatives or distributors must follow the AGCO policies. These policies are located on the Global Compliance site on InsideAGCO.

To help us ensure that the Company's funds are not used for illegal purposes, we must all keep accurate books and records of any payments that we make on the Company's behalf.

AGCO strictly prohibits the use of "facilitation" or "grease" payments to secure or speed up routine legal government actions.



## Want to Know More?

Oversight and compliance with AGCO's bribery and corruption program is managed by AGCO's Legal and Compliance Function. In addition to this section of the Code, AGCO has several other resources that you can consult if you have questions or concerns about AGCO's policy regarding bribery and corruption. One of these resources is the AGCO Corporation Anti-Corruption Compliance Program Manual which can be found on the Global Compliance site located on InsideAGCO.



## INTEGRITY

*We walk the talk. We are committed to a consistent, honest and reliable way of action.*

## CORPORATE CITIZENSHIP

## G. WE DO NOT LAUNDER MONEY

AGCO conducts business only with reputable customers involved in legitimate business activities and with funds derived from legitimate sources. As a company, we are committed to complying with all anti-money laundering and anti-terrorism laws throughout the world.

Anyone who engages in money laundering not only damages the Company's reputation for integrity, but also subjects themselves and the Company to serious civil and criminal penalties.



## Key Term

**Money laundering** refers to transactions that are intended to conceal the illegal source of funds in order to make those funds appear legitimate.

## What If?

**Q:** *My team recently began working with a new overseas supplier. When we placed our initial order, the supplier requested that we direct our payment to the bank account of a third party with which AGCO does not do business. Is this payment arrangement okay?*

**A:** Probably not. The fact that this supplier is requesting that the payment be directed to a third party with whom AGCO does not work is troubling and could be indicative of illegal activity, such as money laundering. Inform the supplier that AGCO will only pay the supplier directly, and if the supplier refuses direct payment, discuss the issue with AGCO's [Chief Ethics and Compliance Officer](#).

## H. WE COMPLY WITH TRADE LAWS

AGCO conducts its business across the globe and must comply with the laws and regulations that govern its trading practices. These laws and regulations include export and import controls, sanctions, anti-boycott requirements and trade embargoes.

Regardless of our roles with the Company, we are responsible for ensuring that we comply with laws regulating the classification, licensing, end use, recipients and duties related to AGCO's exports.

Follow the rules. Violations of export control regulations could result in the Company losing the ability to export products, as well as in civil and criminal penalties. To help ensure our compliance with applicable export controls, you should always maintain complete and accurate records of AGCO's export activities.

AGCO is also committed to complying with the applicable import laws and regulations, including laws that regulate customs compliance.

As a U.S. company, AGCO is prohibited from participating in or condoning any economic boycotts of countries, groups or individuals, including the Arab League Boycott of Israel. If you receive a request to participate in such a boycott, you should immediately notify your supervisor or AGCO's Chief Ethics and Compliance Officer.

Similarly, AGCO is prohibited under U.S. law from conducting trade activities with certain sanctioned countries, people and products. The consequences of breaching sanctions laws are very significant. To verify the appropriateness of your relationships and activities, you should consult with your supervisor or AGCO's Chief Ethics and Compliance Officer.



## Key Term

An **export** is the transfer of AGCO goods, products, services or technology across a country's borders.



## Want to Know More?

For additional information, please see our Sanctions Policy on InsideAGCO.



# PROTECTING AGCO

Putting farmers at the center of everything we do. It starts with integrity and transparency and taking care of our assets — protecting what we've planted — so we can share our innovations and our insights with the world.

## PROTECTING AGCO

## A. WE MAINTAIN FINANCIAL INTEGRITY

The accuracy and completeness of AGCO's financial and accounting records is crucial to our shared success. All books, records and accounts of AGCO must be maintained in an accurate and auditable manner, as well as in conformity with generally accepted accounting principles.

No entries should be made which intentionally conceal or disguise the true nature of an AGCO transaction. Specifically, employees must adhere to the following important guidelines:



- > No funds or accounts should be established or maintained for a purpose that is not fully and accurately described in the relevant books and records.



- > No undisclosed, unrecorded or "off book" funds or assets will be established for any purpose.



- > No false or fictitious entries should be made or misleading reports issued. All entries will accurately and fairly describe the transaction they purport to cover.



- > Payments may be made only for actual services rendered or products delivered; false or fictitious invoices may not be paid.



- > No document will be dated as of any date other than the actual date of execution unless that document clearly states on its face that the date is to be regarded "as of" a different date.



- > Business expenses properly incurred in performing Company business must be documented promptly with accuracy and completeness on expense reports. The employee must distinguish between travel expenses, business conference expenses and business entertainment expenses.



## Key Point

**AGCO believes that ethics and behavior are individual responsibilities. The Company expects high standards of behavior from all of its employees, regardless of rank or position. Each of us has an obligation to conduct AGCO business fairly and impartially in an ethical and proper manner.**

If you have reason to believe that the books and records of AGCO are not being maintained in accordance with these requirements, you should report the matter directly to your supervisor or to AGCO's [Chief Ethics and Compliance Officer](#) or to the Chair of the Audit Committee of the Board of Directors.

Sound management of AGCO's cash and accounts helps prevent bribes, kickbacks and other illegal payments. Loosely controlled cash or other funds (i.e., "slush funds") can contribute to the improper use of AGCO's assets and make it possible to circumvent the controls established to prevent bribes, kickbacks or illegal or improper payments.

Here are some guidelines to keep in mind:

- All bank accounts containing AGCO funds, except accounts in the names of custodians of petty cash funds, should be established and maintained in the name of AGCO.
- All transactions containing AGCO funds should be clearly identified in AGCO books and records.
- All cash and bank transactions will be handled in such a manner as to avoid any grounds for question or suspicion. For example, all cash received by AGCO should be promptly recorded on its books and deposited in an AGCO bank account.
- No funds should be maintained by AGCO in the form of cash, except to the extent reasonably required for normal business operations.



## TRANSPARENCY

We provide full information required. We communicate openly and sincerely. We appreciate feedback.



## PROTECTING AGCO

### B. WE COMPLY WITH FINANCIAL REPORTING REQUIREMENTS

AGCO's shareholders and the investment community depend upon us to ensure the accuracy and completeness of any public filings or financial statements that AGCO makes with the U.S. Securities and Exchange Commission (SEC). Specifically, AGCO's financial and accounting staffs must exercise particular care in their preparation and filing of SEC reports and in preparing other financial statements or public announcements on behalf of the Company.

As a U.S. company, AGCO must comply fully with the U.S. Sarbanes-Oxley Act of 2002 and generally accepted accounting principles and to apply such principles in a consistent and conservative manner. It also is AGCO's policy to file timely, accurate and complete reports with the SEC and promptly to correct any misstatement made as soon as practicable upon confirming that a misstatement in fact occurred and that the misstatement is material.

### C. WE KEEP ACCURATE RECORDS

We create many different types of records and documents in our roles for AGCO which need to be maintained in compliance with the Company's records management policies. These Company records could play an important role in a government audit or investigation, or could be discoverable in litigation involving the Company. As such, we must never inappropriately alter or destroy Company records but should instead comply with applicable records retention schedules.

In certain situations, AGCO may issue a "legal" or "litigation" hold that requires employees to forego normal records destruction schedules in order to accommodate threatened or pending investigations, lawsuits or audits that involve AGCO. Each of us must identify all affected records within our control and retain them as required by law. You should also make sure that any automatic systems for record disposal are set to avoid destruction of applicable records and information.



## PROTECTING AGCO

## D. WE PROTECT COMPANY ASSETS

We all share an obligation to protect and properly use the property and funds that AGCO entrusts to us in our roles for the Company.

The Company encourages all of us to:

- *Be cost conscious on the job.*
- *Be alert to opportunities for improving performance while reducing costs.*

Conserving resources enables AGCO to compete more effectively, provide jobs and invest in the future.

From time to time, AGCO understands that some personal use of Company property may be necessary, such as personal use of communication systems. As a general rule, however, you should avoid personal use of Company property, whether it is office supplies or equipment of greater value like computers and vehicles.

Likewise, AGCO property should not be used for personal benefit or sold, loaned or given away, regardless of condition or value, unless you have authorization to do so.

In addition to the proper use of Company property, each of us is also personally accountable for the proper use of AGCO funds. Whether you are responsible for spending AGCO's money, or simply seeking reimbursement for the use of your own money for AGCO business, you should be sure that the Company receives good value in return.

If you review, approve or certify to the correctness of a voucher, bill or other financial statement as part of your role at AGCO, you should always first confirm that the purchases and amounts are appropriate.



## Key Point

**AGCO's property** includes physical property, such as:

- Facilities
- Equipment
- Vehicles
- Supplies

And communication systems, such as:

- Email
- Telephones
- Use of the internet

## E. WE PROTECT OUR COMPANY'S INTELLECTUAL PROPERTY

AGCO's intellectual property represents some of our most valuable assets and are the source of new product innovations for our farmers. Each of us must therefore comply with any intellectual property laws or regulations and help ensure the protection and proper use of AGCO's intellectual property. Do not permit unauthorized disclosure of AGCO's intellectual property.

Similarly, we must respect the intellectual property rights of others, including our competitors and former employers. Because AGCO's intellectual property may include anything that we design or create in our roles for the Company, we should be mindful that those designs and creations will remain both Company property and protected by law after we leave AGCO.

If you have any questions about your responsibilities for protecting the Company's intellectual property and respecting the intellectual property rights of others, contact AGCO's [Chief Ethics and Compliance Officer](#).



## Key Point

**AGCO's intellectual property** can include any of the following:

- Copyrights
- Trademarks
- Patents
- Trade secrets
- Designs
- Inventions
- Business processes
- Know how
- Technology



## PROTECTING AGCO

## F. WE RESPECT PRIVACY AND CONFIDENTIALITY

AGCO is committed to respecting the privacy and confidentiality of all employees, customers, vendors and other business partners for whom it collects, stores and processes personal or sensitive information.

In addition, the Company complies with all applicable laws and regulations governing privacy and confidentiality. Any information that AGCO collects is used only for legitimate business purposes, and any access to such information is limited to those employees who have a true business need for accessing it.

Unless required to disclose by law, all AGCO employees share an obligation to protect the privacy and confidentiality of information that is entrusted to the Company.

Employees must protect all proprietary information relating to AGCO or its business associates in a manner consistent with all applicable laws and AGCO's procedures and policies and any applicable agreements. In the course of daily activities, employees often are exposed to information about AGCO and other companies that is not generally available to outsiders or even to other employees.

The privacy of business communications is basic to our information systems.

It is AGCO's policy to minimize intrusiveness into its business records, such as employee records, payroll records, benefit plans, labor agreements and succession and career planning records. These records will contain only information necessary for business purposes and compliance with the law. The protection of our employees' rights to privacy is as important to AGCO as the protection of AGCO's proprietary information.

All emails and other materials generated using Company property are the sole property of the Company, and employees have no personal interest or right of privacy in those materials, including emails that they might send or receive from their computers that are of a personal nature.



### Key Term

**Confidential information** includes all non-public information that might be of use to competitors, or harmful to AGCO or its customers, if disclosed.

## COMMUNICATING ABOUT AGCO

If questions about AGCO come to you from someone outside of the Company, you should not attempt to answer the question unless you are authorized to do so. Instead, you should refer the person to the appropriate source within the Company who is authorized to speak on AGCO's behalf.

If you do not know to whom the question should be referred, ask your supervisor.

## SOCIAL MEDIA

Take care in your online activity. AGCO encourages its employees to avoid discussing Company business on social media or in chat rooms, message boards or other public forums. Never give the impression that you are speaking or posting on behalf of AGCO, and never disclose confidential business information or post anything about our business customers, employees or business partners that would constitute a threat, intimidation, harassment, bullying or discrimination.

If you believe a false statement about AGCO has been posted online, you should refrain from reacting, even if well-intentioned and meant to "set the record straight." Your post could be misinterpreted, start false rumors or even be inaccurate or misleading. Your best course of action would be to report the incident to Corporate Communications.





PROTECTING AGCO

**G. WE PROTECT OUR INFORMATION AND SYSTEMS**

Good cybersecurity practices support good data security. Be a responsible steward of our electronic resources and systems:

- *Do not share your passwords or allow other people, including friends and family, to use AGCO resources.*
- *Lock your workstation when you step away and log off our systems when you complete your work for the day.*
- *Beware of phishing attempts. Use caution in opening email attachments from unknown senders or clicking on suspicious links.*

**POLICIES AND RESOURCES**

AGCO maintains a Global Compliance intranet site with additional information about this Code, other policies and guidelines together with other ethics and compliance matters which can be located on InsideAGCO. If you do not have access to the intranet site, ask your manager, Human Resources or the Legal Function for more information.

**To contact the Chief Ethics and Compliance Officer, please use any of the following:**



**Email:** [roger.batkin@agcocorp.com](mailto:roger.batkin@agcocorp.com)



**Mail:** Roger Batkin  
Senior Vice President, General Counsel  
and Corporate Secretary  
AGCO Corporation  
4205 River Green Parkway  
Duluth, GA 30096, USA





**IF YOU HAVE QUESTIONS ABOUT:**

**CONTACT THE FOLLOWING RESOURCE(S):**

<b>Reporting Code of Conduct Concerns</b>	<b>Chief Ethics and Compliance Officer</b>
<b>Antitrust or Competition Issues</b>	<b>SVP, General Counsel, Chief ESG Officer and Corporate Secretary</b>
<b>Bribery or Corruption</b>	<b>Director, Global Compliance or Director, Global Internal Audit</b>
<b>Communicating on Behalf of AGCO</b>	<b>Corporate Communications</b>
<b>Conflicts of Interest</b>	<b>Chief Ethics and Compliance Officer</b>
<b>Data Privacy or Confidentiality</b>	<b>Director, Global Compliance</b>
<b>Environment and Sustainability Issues</b>	<b>Director, Global Sustainability</b>
<b>Financial Integrity or the accuracy of AGCO's Books and Records</b>	<b>SVP, Chief Financial Officer or Director, Global Internal Audit</b>
<b>Gifts, Entertainment or Hospitality</b>	<b>SVP, General Counsel, Chief ESG Officer and Corporate Secretary</b>
<b>Harassment or Discrimination</b>	<b>SVP, Chief Human Resources Officer</b>
<b>Health or Safety Issues</b>	<b>SVP, Chief Supply Chain Officer</b>
<b>Human Rights Violations</b>	<b>SVP, General Counsel, Chief ESG Officer and Corporate Secretary</b>
<b>Product Quality or Safety</b>	<b>SVP, Chief Supply Chain Officer</b>
<b>Political Activities or Lobbying</b>	<b>SVP, General Counsel, Chief ESG Officer and Corporate Secretary</b>
<b>Sourcing or Supplier Relations</b>	<b>SVP, Global Customer Experience</b>