

GENERAL DYNAMICS

Code of Ethics for Financial Professionals

At General Dynamics, our Ethos is our distinguishing moral character. It guides our behavior in all things, at all times. Following the principles of our Ethos will ensure that we live up to the high expectations we place upon ourselves, and which our customers and shareholders expect of us.

Consistent with these principles, I wish to highlight for you some specific obligations for the financial leadership of the Corporation and its Business Units which are mandated by our Ethos. These obligations apply in particular to me as Chief Executive Officer, as well as to the Chief Financial Officer, the Controller and any person performing similar duties for the Corporation and its subsidiaries. In the interest of transparency and clarity, these specific obligations mandated by our Ethos are set forth below. These obligations include:


- Avoiding conflicts of interest;
- Engaging in honest and ethical conduct, including the ethical handling of any actual or apparent conflicts of interest between personal and professional relationships;
- Producing full, fair, accurate, timely and understandable disclosure in all reports and documents that our company or its subsidiaries files with, or submits to, the Securities and Exchange Commission and other regulators, and in other public communications made by our company and its subsidiaries;
- Complying with applicable governmental laws, rules and regulations, as well as the rules and regulations of private and public regulatory agencies and organizations to which our company is subject; and
- Promptly reporting any failure to abide by these standards to our Legal Department or through any of the channels listed in the General Dynamics Standards of Business Ethics and Conduct handbook.

In addition, our Ethos requires that we neither directly nor indirectly take any action to fraudulently influence, coerce, manipulate or mislead the independent public auditors for our company for the purpose of rendering the financial statements of our company misleading.

Our colleagues, our shareholders and our customers expect the very best of us, and we expect it of each other. It is a responsibility of each of us to work to proactively promote ethical behavior and adherence to our Ethos. We are each accountable for violations of this code and our Ethos, and I know that we all understand well the grave consequences, including potential termination, for failing to live up to this expectation.

Because of the critical importance of the principles contained in this Code of Ethics for Financial Professionals, any amendment or waiver of this code may only be made by the board of directors of our company or a committee of the board, and will be publicly disclosed if required by law or stock exchange requirement. Similarly, because of the importance of this matter, I ask you to join me in signing and returning to your Business Unit Ethics Officer the attached acknowledgement of this Code of Ethics for Financial Professionals.

If you have any questions regarding the best course of action in a particular situation, you should contact our Legal Department. You may choose to remain anonymous in doing so if you wish.



10/20/18