

UNITED  
WE RIDE

**Harley-Davidson's  
Code of Conduct**







## THE RULES OF THE ROAD: A MESSAGE FROM OUR CEO

Over 120 years ago, the ingenuity, imagination and vision of our Company founders started something that still resonates today: conducting our business with integrity.

We do things the right way. Always.

We don't take shortcuts. We don't take the easy way out. We make the right choices—even if they are difficult—especially when they are difficult. We make ethical choices that are worthy of our iconic brand.

This Code of Conduct ("Our Code") is a guidepost for our work. It describes some of the risks and consequences we face and lays out the expectations for behavior that we all must follow. Our Code is for each and every one of us, no matter what our role is at Harley-Davidson. I encourage you to read Our Code and refer back to it when you have questions.

Our Code can't cover every situation, and you might have questions or concerns down the road. When you do, you should speak up and seek assistance from your manager or use one of the avenues listed below. Harley-Davidson does not tolerate retaliation against those who report concerns and will investigate each of those concerns appropriately.

As we continue our journey, we must maintain our well-deserved reputation for integrity. The decisions we make every day contribute to that reputation, so use Our Code in your daily work.

United We Ride.

**Jochen Zeitz**  
Chairman, President and CEO





## SPEAK UP RESOURCES

### You Can Get Answers or Report Concerns by:

- Speaking with your manager or Human Resources representative.
- Contacting the Legal Department, Harley-Davidson, Inc.'s Compliance Officer or Chief Legal Officer.
- Using the confidential Code of Conduct Helpline. The Helpline is available anytime, around the world, and if permitted by applicable laws, you can choose to report anonymously.
  - Online: [www.h-dcodehelpline.com](http://www.h-dcodehelpline.com).
  - Telephone: from inside the United States: 855-318-5389
  - Telephone: from outside the United States: Located under the [How We Speak Up](#) section of Our Code on page [48](#).





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# FAIR, HONEST, POSITIVE AND CREATIVE (FHPC)

## HARLEY-DAVIDSON'S MORAL COMPASS



**Fair Means Balanced.** It means we see both sides and resist the pressures that can push us into extreme ways of thinking, working or living. Being fair means listening as much as we talk and giving back as much as we take.



**Honest Means Sincere.** It means not faking it, rather walking the walk as much as we talk the talk. Being honest means admitting our mistakes and owning up to our responsibilities—something that applies to companies as much as it does to individuals.



**Positive Means Constructive.** It means building things—and people—up, not breaking them down. It means supporting others when they try, encouraging them when they fail and celebrating with them when they succeed.



**Creative Means Imaginative.** It means thinking outside the box. It means looking at new ways, listening to new ideas and trying new strategies. It means striving for the most innovative solution because just being good enough is never good enough.

FHPC gets to the heart of what we think is most important in the way we're creating the company we want to be. As we make decisions, execute plans and communicate with one another, we can use the four keys of FHPC to help guide us toward the best outcomes.





## OUR COMMITMENT TO EACH OTHER

We're in this together, and respect is  
our standard operating procedure.



# Culture

## Why This Matters

At Harley-Davidson we aspire to have an employee base that reflects our customers and the geographies in which we operate. It is critical to our business that we hire and retain the best talent and that all employees feel welcome.

## Avoiding Potholes and Navigating Ethically

**Fair Recruitment:** Make sure you undertake recruitment fairly.

**Unethical Conduct:** Don't be afraid to call out unethical conduct.

**Getting Involved:** Leverage the H-D#1 Leadership Principles in how you interact with your fellow employees, partners, customers and communities.

**Raise Your Hand:** If you have any questions relating to Company Culture or need help with a specific situation, please reach out to your manager or the Human Resources Department.

## WHAT'S UP AHEAD?

We embrace a culture that supports varying backgrounds, thoughts and perspectives. We believe that people can be more creative and innovative when they feel respected and included. We also believe that having varied perspectives helps generate better solutions to complex problems and helps us to better serve our partners, customers and communities.



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*For further information about Harley-Davidson's Culture, please speak to the Human Resources Department.*





**Q:** I am hiring for a role on my team. How can I help ensure that the recruitment process is fair and reflects the Company's culture?

**A:** To promote a recruitment process reflective of our culture and FHPC, focus on ensuring fairness and consistency while identifying the best candidate for the role. This starts with ensuring that the job postings are accessible, the role and responsibilities are clearly defined, job descriptions welcome candidates whose skills and experience align with the role's expectations and accommodations are available when needed. We must also focus on objective criteria for evaluating candidates and apply these consistently throughout the process. If you have specific questions, please contact your Human Resources representative.

**Q:** What should I do if my co-worker makes derogatory comments about people's personal characteristics?

**A:** Let them know their conduct is inappropriate and report it to a manager or a Human Resources representative.

**Q:** How can I get involved in promoting the Company's culture?

**A:** Promoting our culture starts with embodying FHPC in your daily actions at H-D. Leverage the H-D#1 Principles to set an example for others. Lead with respect, communicate with purpose, hold yourself accountable, and participate in initiatives that help enhance employee engagement. By living these principles, you help create a workplace where everyone feels empowered to contribute their best.

# Harassment and Discrimination

## Why This Matters

By maintaining a workplace that is free from harassment and discrimination, we are able to cultivate a culture where everyone feels welcomed and valued.

## Avoiding Potholes and Navigating Ethically

**Inappropriate Conduct:** Speak up about inappropriate conduct.

**Offensive Material:** Report inappropriate behavior.

**Show Respect:** Treat others how you would expect to be treated.

**Raise Your Hand:** If you believe you are experiencing or observing harassing or discriminatory behavior, please reach out to your manager or the Human Resources Department. Reports will be treated as confidential to the extent possible. We do not tolerate retaliation against employees who make reports in good faith. If you suspect that you or someone else is being retaliated against for making a report in good faith, please report the conduct to the Human Resources Department or the Legal Department.

## WHAT'S UP AHEAD?

We are committed to a workplace that is free from harassment and discrimination. Our Company provides equal employment opportunities for all employees and applicants, and we make employment decisions based on skill and experience, not on an individual's protected category.



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*For further information about Harley-Davidson's anti-harassment and discrimination procedures, please see our [Workplace Respect Policy](#).*





### What are Protected Categories?

They are categories protected by law such as race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression or any other characteristic protected by applicable federal, state or local law.

### What is Harassment?

Harassment is unwelcome conduct that creates an intimidating or hostile environment by targeting an individual's protected category. Harassment can be physical, verbal, nonverbal, electronic or online/social media behavior.

Examples of verbal harassment include insults, jokes, inappropriate remarks and teasing because of a protected category. Nonverbal harassment can include the distribution, display or discussion of material that insults or shows hostility or disrespect toward an individual because of their protected category.

### What is Sexual Harassment?

Sexual harassment includes unwanted sexual advances or propositions, offers of advancement or threats of employment consequences in exchange for sexual favors, lewd remarks or jokes, degrading or sexually suggestive comments, offensive gestures, unwelcome requests for sexual favors or dates and unwelcome physical contact.

**Q:** A co-worker talks to me about their new relationship and asks me questions about my relationship with my significant other that makes me uncomfortable. What should I do?

**A:** Speak up about their conduct and report it to your manager or a Human Resources representative.

**Q:** A tenured co-worker on our team has applied for a promotion. Some team members have commented that they should have retired by now instead of seeking a promotion. Should I do something?

**A:** Yes, speak up about the team members' conduct and report it to your manager or Human Resources representative.

**Q:** A co-worker prefers the pronouns "they/them," but I'm used to using "he/him" or "she/her." What should I do?

**A:** Respect your co-worker's choice of preferred pronouns and use it to refer to them.

# Workplace Safety

## Why This Matters

Safety is a 24/7 commitment and requires everyone's participation. By working together to provide a safe and secure workplace, we can ensure that we all have an environment where we can do our best work.

## Avoiding Potholes and Navigating Ethically

**Dangerous Work Practices:** Speak up about dangerous work practices.

**Hazards:** Report hazards.

**Raise Your Hand:** If you have any questions or need to report a safety concern, please reach out to your manager or the Human Resources Department.



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*For further information about Harley-Davidson's workplace safety procedures, please see our [Workplace Health & Safety Policy](#).*

## WHAT'S UP AHEAD?

We are committed to providing a safe and healthy work environment. Behavior that poses a risk to safety, health and security is not allowed. We have zero tolerance for violence or weapons in our workplace. We also prohibit working under the influence of any substance that impairs the ability to work safely.







**Q:** I've noticed that a co-worker at our manufacturing facility is not using appropriate personal protective equipment (PPE). Should I do something?

**A:** Yes. We all have a role to play in maintaining a safe environment. Remind your co-worker of the need to wear appropriate PPE and where they can obtain it. If they continue working without the required PPE, report this to your manager or to the Code of Conduct Helpline.

**Q:** Our work area lights intermittently flicker, and there is a buzzing sound near some of our plug sockets. What should I do?

**A:** Report any hazard, such as faulty plug sockets, to your manager. Safety requires everyone's participation. If you see something, say something.

# Human Rights

## Why This Matters

We want to bring the best products to market and meet our business goals, but we never let our goals lead to any mistreatment of people. We always support human rights and respect for all people.

Harley-Davidson is committed to respecting and promoting human rights and supports the [Universal Declaration of Human Rights](#), including the [UN Guiding Principles](#) and the [International Labor Organization \(ILO\) Declaration on Fundamental Principles and Rights at Work](#). These foundational principles include the prohibition of child labor, the prohibition of forced labor in all forms, freedom of association and the right to collective bargaining and protection from discrimination.

We are official signatories to the [UN Global Compact](#), and we are committed to treating all of our stakeholders – including our employees, customers, shareholders and suppliers, and the communities in which we operate – with dignity, respect and equality, and also to partnering with our stakeholders to help them to do the same. We believe in an inclusive stakeholder approach to business across our operations and value chain that balances people, planet and profit to deliver long-term value for ALL stakeholders.



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*For further information about Harley-Davidson's commitment to human rights, please see our [Supplier Code of Conduct](#) and the [UN Universal Declaration of Human Rights](#).*

## WHAT'S UP AHEAD?

Human rights are universal rights, and they include basic freedoms that are the same no matter who we are or where we are from.







### Avoiding Potholes and Navigating Ethically

**Protecting Human Rights:** We make sure that our operations are free of unsafe and unfair work practices, including slavery, forced labor, prison labor, human trafficking and child labor, and we respect our employees' freedom of association and right to collective bargaining.

**Working with Responsible Third Parties:** We strive to ensure that any third parties we work with, including suppliers, consultants, contractors and others, abide by the same principles we do.

**Raise Your Hand:** If you have any questions about human rights or need help with a specific situation, please reach out to the Code of Conduct Helpline or the Company's Compliance Officer.

**Q:** While touring a supplier's manufacturing facility, I noticed some employees who do not look to be the legal working age. What should I do?

**A:** You should contact the Code of Conduct Helpline or the Compliance Officer and report your concerns about the supplier's practices.



## OUR COMMITMENT TO HARLEY-DAVIDSON

We're accountable. We don't make excuses; we do the right thing and follow our rules.



# Conflicts of Interest

## Why This Matters

By avoiding conflicts of interest, we can make fair decisions, use sound judgment and let our values guide us. Unresolved conflicts can have a significant impact on the Company, resulting in loss of revenue, reputational damage, misuse of Company time or resources or inappropriate allocation of benefits. When conflicts arise, we disclose them and manage them properly to protect the best interests of Harley-Davidson, our customers and the people who rely on us. We must also avoid the appearance or perception of a conflict.

## Avoiding Potholes and Navigating Ethically

**Financial Interests:** Refrain from having any financial ties to companies that do business

or are seeking to do business with Harley-Davidson. Financial interests with such companies could make it hard for you to be objective when making decisions for Harley-Davidson.

## Dual Employment/Outside Engagements:

Business decisions and actions on behalf of the Company should be free from any conflicts of interest. Any employment, consulting, leadership role or board position that you or an immediate family member may have with any Harley-Davidson supplier, competitor, partner, dealer or customer constitutes a potential conflict of interest and must be reported. When fulfilling your job duties, you should act in the best interest of Harley-Davidson.

## WHAT'S UP AHEAD?

What is a conflict of interest?

Conflicts can happen when our personal interests or relationships clash with our responsibilities to Harley-Davidson, meaning our personal interests or outside activities affect, or could be perceived to affect, our ability to make objective decisions for the Company.



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*For further information about Harley-Davidson's procedure for examining potential conflicts, please see our [Conflict of Interest Policy](#) or the [Conflict of Interest Disclosure Report Form](#).*



**Personal Relationships:** Be careful about having personal relationships with people who could benefit from doing business with Harley-Davidson. It's important to make sure your decisions are objective and not influenced by personal connections.

**How to Disclose:** If you find yourself in a situation that could be a conflict of interest, it's important to be honest and let us know. Remember, the purpose of disclosing conflicts of interest is to handle them openly and manage them so that Harley-Davidson's best interests are protected. To inform us of a conflict or potential conflict, follow this link to our [Conflict of Interest Disclosure Report Form](#).

**Raise Your Hand:** If you have any questions about conflicts of interest, or need help with a specific situation, please reach out to the Human Resources Department.

**Q:** What's an example of a financial interest that could be a conflict?

**A:** If you or a family member has an ownership interest in a muffler manufacturing company that is looking to become a supplier of Harley-Davidson, it will make it difficult for you to make choices that are in the best interest for Harley-Davidson because of your financial interest in the muffler company.

**Q:** What's an example of a personal relationship that could create a conflict?

**A:** If you are a member of the team considering sourcing goods from a company that your friend owns, and you fail to disclose your relationship, a conflict could exist because you have the potential to influence the sourcing decision.



# Bribery and Corruption

## Why This Matters

By complying with anti-bribery and corruption laws and regulations, we adhere to the law and don't improperly influence any business decision-making. We also ensure that we interact ethically with our stakeholders—whether they are government employees, consultants or suppliers.

## Avoiding Potholes and Navigating Ethically

**Hosting a Government Official:** Be careful when hosting government officials.

**Inappropriate Practices:** Ensure you obtain approval from the Legal Department prior to providing anything of value to a government official and report inappropriate offers.

**Raise Your Hand:** If you have any questions regarding bribery or corruption, or need help with a specific situation, please reach out to the Legal Department.



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*For further information, please see our [Anti-Bribery & Anti-Corruption Policy](#) and [Gifts & Hospitality for Government Officials Policy](#).*

## WHAT'S UP AHEAD?

We never bribe or accept bribes—meaning we don't take or provide anything of value to influence anyone's business decision-making or to receive any benefit. It is against our policies and against domestic and international laws to either offer or accept bribes to influence decision-making.



### Gifts and Hospitality for Government Officials

When interacting with government officials, we don't offer, promise or provide anything of value to influence decision-making or to secure ourselves or the Company any benefit. We also do not make facilitation payments (small payments to expedite routine government actions, such as issuing permits). Aside from light refreshments at a business meeting or Harley-Davidson promotional merchandise (e.g., mugs, tote bags, pens), any gifts or hospitality offered to government officials must receive prior written approval from your functional leader and the Legal Department.

The actions of third parties taken on behalf of the Company or for the Company's benefit can expose the Company to civil and criminal penalties. Therefore, it is important that we conduct due diligence before engaging with them and evaluate the relationship throughout the engagement. Additionally, we must maintain accurate and complete records of all transactions with suppliers, vendors, customers and government officials.

### Who is a Government Official?

Anyone with any affiliation with a government agency, including politicians, government employees at any level, candidates for political office, employees of an international organization such as the World Bank, or directors, officers or employees of a government-owned or -controlled (in whole or in part) company.

### What Do We Mean By "Anything of Value"?

Just that: cash, gifts, favors, donations to a favorite charity, a job offer or anything else that could be valuable to the recipient.

**Q:** I'm meeting with a government official to discuss a Harley-Davidson event. The meeting takes longer than expected, so we plan to have lunch together to continue the discussion. Can I pay for the lunch?

**A:** No. Harley-Davidson's Gifts & Hospitality for Government Officials Policy requires pre-approval for any hospitality, including a lunch, that may be provided to a government official. For a business meeting, our policy allows for offering light refreshments, but taking the government official to lunch would require pre-approval from the Legal Department.

**Q:** A member of a Harley Owners Group (H.O.G.) who also holds public office was unable to register in time for a touring rally across three states. They've offered me two free tickets to a football game if I can add them to the registration list. Should I accept?

**A:** No. We must ensure that we interact ethically with our stakeholders. Accepting the tickets would be inappropriate as they are an attempt to influence your decision-making on registering the H.O.G. member for the event and would violate Our Code and potentially the law. Decline the offer, politely explain our policy and report this to the Legal Department.



# Gifts and Entertainment

## Why This Matters

Giving or accepting gifts and entertainment with current or potential business partners can be important for building and maintaining strong business relationships. However, the exchange of extravagant or inappropriate gifts and entertainment can suggest improper influence over our business decision-making, and we must ensure that there is no issue about the integrity of our decision-making.

## Avoiding Potholes and Navigating Ethically

**Gifts from Suppliers:** Make sure you follow Our Code and policies when dealing with gifts.

**Invitations to Events:** Ensure that your actions promote the integrity of our business decisions.

**How to Disclose:** Receipt of any gifts or entertainment must be disclosed in writing to your manager in accordance with the Gifts & Entertainment Policy. Employees may also use the [Conflict of Interest Disclosure Report Form](#) through the Code of Conduct Helpline.

**Raise Your Hand:** If you have any questions about whether a gift or entertainment is appropriate, or need help with a specific situation, please reach out to your manager or the Human Resources Department.

## What is a Gift?

A gift can be anything of value, for example, tangible items, entertainment, loans, favors and other benefits.

## WHAT'S UP AHEAD?

We don't offer, provide or receive gifts or entertainment for the purpose of securing a business advantage or influencing decision-making. We also don't offer or accept gifts in cash or cash equivalents such as gift cards. We ensure that gifts and entertainment have a legitimate business purpose and are appropriate and comply with our Gifts & Entertainment Policy. We never accept gifts or entertainment from government officials.



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*For further information about Harley-Davidson's gifts and entertainment procedure, please see our [Gifts & Entertainment for Employees Policy](#), [Anti-Bribery & Anti-Corruption Policy](#), [Gifts & Hospitality for Government Officials Policy](#) and [Travel & Expense Policy](#).*





### What is Business Entertainment?

Business entertainment includes meals or events such as sports competitions, concerts or other outings. We should only offer or accept appropriate business entertainment within our limits, use good judgment and make sure that the supplier or other provider is also participating.

**Q:** A supplier has given me an iPad Pro as a holiday gift. Can I accept it?

**A:** No. This is an expensive item that exceeds the permitted modest value limit for gifts. You should return it to the supplier and politely explain our policy.

**Q:** A supplier has invited me to an overseas conference and offered me and my family the use of their vacation home during the event. Should I accept this?

**A:** No. While we can accept invitations to attend certain conferences with business approval, you should politely decline the offer of the vacation home, as accepting it could be seen to have an improper influence on your business decision-making.



# Confidential Information

## Why This Matters

We all play an important role in protecting the Company's confidential information. Maintaining confidentiality supports our business success and protects the Company's legacy, and failing to do so could negatively affect our business, harm our reputation and lead to legal liability.

## Avoiding Potholes and Navigating Ethically

**Protecting Our Brand:** Speak up about unapproved, unlicensed use of our logo and other intellectual property.

**Confidential Information:** Safeguard our confidential information and patent registrations.

**Raise Your Hand:** If you have questions about confidential information or intellectual property, or need help with a specific situation, please reach out to the Legal Department.

## What is Confidential Information?

Confidential information refers to non-public information such as business or strategic plans, product information and designs, methods, marketing plans, financial information, customer and partner data, organizational charts, intellectual property and other information that is not known outside of an organization.

## What is Intellectual Property?

Intellectual property refers to creations of the mind such as brands and designs, patents, trademarks, copyrighted materials, trade secrets and software.

## WHAT'S UP AHEAD?

We protect Company confidential information and intellectual property. We share this information only with authorized people when there is a business need to do so. We also respect the confidential information and intellectual property rights of others.



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*For further information about Harley-Davidson's confidentiality procedures, please see our [Electronic Communications Policy](#) and [Employee Commitment](#). Sharing confidential information may also violate the [Insider Trading Policy](#).*





**Q:** I was shopping online and saw a range of clothes with our bar and shield logo, but the clothing isn't part of our brand. What should I do?

**A:** Report this to the Legal Department with information such as the name of the company, clothing range, website and the page link.

**Q:** A long-standing customer asked me for photos and confidential details of a new motorcycle platform in development. Should I share the information?

**A:** No, decline sharing the confidential information. Beware that in addition to violating confidentiality requirements, sharing the information could impact our ability to patent the new platform. Also inform the Legal Department about this request.



# Third Party Management

## Why This Matters

To meet our goals, we have to work effectively and ethically with third parties, and while we need these relationships to be successful, we never sacrifice integrity or cut corners when evaluating, onboarding or monitoring the work of current and potential third parties. Our third parties represent us, and we expect them to meet the same standards we require of ourselves.

## Avoiding Potholes and Navigating Ethically

**We Select the Best:** We select the third parties we work with based on performance and results and give qualified third parties a chance to compete for our work.

**Screen and Watch for Red Flags:** We conduct due diligence on the third parties we work with to ensure we've properly identified and mitigated red flags prior to their engagement. We also pay attention to our third parties and monitor their adherence to our agreements and compliance with our policies and procedures. If you believe one of our third parties is not acting in accordance with our agreements or our expectations, please speak up.

**Raise Your Hand:** If you have questions about working with third parties, or need help with a specific situation, please reach out to your manager or the Legal Department.

## WHAT'S UP AHEAD?

Third parties are individuals or entities, such as suppliers, dealers, distributors, consultants and contractors, that provide us goods or services or act on Harley-Davidson's behalf.



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*For further information about Harley-Davidson's third party management process, please see our [Procurement Policy](#).*





**Q:** My cousin just started a graphic design business, and I am thinking about helping her by throwing a bit of work to her from the Company. Is that OK?

**A:** We select our suppliers based on their skill and ability to perform. While your cousin may be qualified, the fact that she is related to you cannot be a factor in our decision-making, and you must disclose the relationship as a potential conflict of interest if she is seeking work from the Company.

**Q:** We urgently need to engage a vendor to assist with a project. Due to the urgency, we are going to bypass the due diligence process. Is that OK?

**A:** The due diligence process cannot be skipped when onboarding a third party. If your situation is urgent, contact the Legal Department.



# Data Security and Asset Protection

## Why This Matters

Harley-Davidson's assets are essential business tools, and we all have responsibilities when utilizing them. By safeguarding Company assets, systems and networks, we can help ensure they are not compromised and that we are able to conduct business efficiently and effectively.

To protect the Company's electronic assets and prevent data security breaches, we always maintain control of our laptops, devices and login credentials to avoid unauthorized use or loss. Company systems and networks include our email, shared drives, laptops, mobile devices and software applications. We are vigilant and don't click on suspicious files or links.

## Avoiding Potholes and Navigating Ethically

**Company Equipment:** Don't use Company tangible assets for excessive or unreasonable personal use.



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*For further information about Harley-Davidson's data security procedures, please see [the Corporate Information Security Office \(CISO\) page](#).*

## WHAT'S UP AHEAD?

To preserve the value of Company assets, we must ensure they are protected from loss and theft and utilized efficiently for business purposes. Assets include both tangible property (e.g., offices, equipment, computers, mobile phones, consumables, systems and networks, other technology resources) and intangible property (e.g., intellectual property rights and confidential information).





**Protect It and Use It Wisely:** We use Harley-Davidson assets in the manner they are intended to be used. That includes the responsible use of communication systems, including electronic assets like computers and other hardware, software, networks and other devices such as smartphones and tablets.

**Security Awareness:** Be vigilant to security issues and report them so that they can be managed.

**Raise Your Hand:** If you have any questions about data security, or need help with a specific situation, please reach out to the Corporate Information Security Office (CISO).

**Q:** I am on the board of a non-profit organization and need to print off some booklets for an upcoming meeting. While I'm in the office, I want to take advantage of the printer. Can I use the Company's printer to print off 30 copies of the booklets for my non-profit organization?

**A:** No. Company equipment should be limited to business use for the Company. While it may be reasonable to print a few pages periodically for personal use, printing 30 booklets for personal use is excessive.

**Q:** While on a personal vacation, I took my work laptop with me in case I was needed for any urgent matters. I rented a car and, since the trunk was full of my luggage, I threw my work laptop in the backseat. Is that OK?

**A:** No. You should never leave your work laptop unattended or unsecured. The best practice is to lock your work laptop in the trunk, so it is not visible in the vehicle.

**Q:** I received a work email requesting me to click on a link to reset my computer password. It looks like the email is from the IT Department, but when I hover over the email address, it's a non-work address that I don't recognize. Should I click on the link?

**A:** No. It could be a phishing attempt (where fraudulent emails are sent to obtain information such as passwords). Please use the Company-approved method for reporting suspected phishing attempts and, if you have any questions, contact the [Digital Office Help Desk](#).



# Insider Trading

## Why This Matters

We do not trade Harley-Davidson, Inc. securities while in possession of material non-public information about the Company. We do not tip family members, friends, relatives or anyone else by providing them with material non-public information for use in trading securities. We do not trade in the securities of other companies using material non-public information that we obtained through our affiliations with the Company, nor do we engage in any other action to take personal advantage of material non-public information.

## What is Material Non-public Information?

This is any information about the Company that has not been widely disseminated to the public that would reasonably affect an investor's decision to buy, sell or hold Company securities. Material information

may include financial results, guidance, earnings results, anticipated mergers and acquisitions, senior management changes, production forecasts, facility expansions or closings, pending recalls and new products or services.

## Avoiding Potholes and Navigating Ethically

### Take Care with Non-Public Information:

Handle requests for our Company information with caution.

**Trading:** Buy or sell Company securities in compliance with regulations and the fair disclosure of information.

**Raise Your Hand:** If you are unsure whether information is material non-public information, or need help with a specific situation, please reach out to the Legal Department.

## WHAT'S UP AHEAD?

We comply with regulations regarding insider trading and the fair disclosure of information. We are careful with confidential information and share it only with those who have a business need to know it. We do not use material non-public information to make trading decisions involving any companies' securities—including Harley-Davidson, Inc.'s—nor do we encourage others to do so.



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*For further information, please see our [Insider Trading Policy](#) and [Managing Disclosure of Material Information Policy](#).*





**Q:** My cousin asked me about a new manufacturing facility opening. This information has not been publicly released by the Company. Can I share the details?

**A:** No, this information is almost certainly Company confidential. It also may be material non-public information. In either case, you should share it only with authorized people to ensure compliance with Our Code and our policies.

**Q:** We are about to announce a major acquisition that I think will increase the value of the Company's stock. Can I immediately buy Harley-Davidson, Inc. stock?

**A:** No. You can't use material non-public information to make decisions to trade Company stock as this violates Our Code of Conduct and our policies and could violate the law. Once the announcement—the material information—has been fully disclosed to the public for a sufficient time (and if no other trading limitations apply), you can trade the stock.



# Accurate Financial Records and Recordkeeping

## Why This Matters

We act with integrity by keeping accurate, complete and objective records. Keeping our books transparent, correct and complete is the only way to do business. We do not mislead, unduly influence or obstruct authorized audits or investigations concerning our internal controls and financial records.

## Avoiding Potholes and Navigating Ethically

**Keep it Straight:** Any information we provide inside or outside the Company should always be accurate, timely and complete. We never conceal mistakes or errors or knowingly create false records.



MAP YOUR  
ROUTE

*For further information about Harley-Davidson's recordkeeping procedures, please see our [Records & Information Management Policy](#).*

## WHAT'S UP AHEAD?

Harley-Davidson has an obligation to keep up-to-date records in a manner consistent with our policies and applicable reporting requirements. We endeavor to comply with all laws, rules and regulations of federal, state, provincial and local governments.





**Follow the Rules:** We follow our procedures and internal controls for recordkeeping as well as any applicable regulations that apply to reporting information externally to the U.S. Securities and Exchange Commission (SEC), any stock exchange or other agencies.

**Raise Your Hand:** If you have questions or concerns about financial records, please reach out to the Finance Department. If you have questions about recordkeeping or external reporting, or need help with a specific situation, please reach out to the Legal Department or our [Code of Conduct Helpline](#).

**Q:** I noticed that a colleague has provided the same receipt for several different expenses on an expense report. When I mentioned this, she pointed out that the amount is the same and that she's lost the other receipts. What should I do?

**A:** You should contact your manager or report the conduct to the Code of Conduct Helpline. Our records must be complete and accurate, and we do not submit information that is false or misleading.



# Appropriate Communications

## Why This Matters

The way we communicate both inside and outside the Company impacts the way Harley-Davidson is viewed by our stakeholders and the public.

## Avoiding Potholes and Navigating Ethically

**Use Good Judgment:** When communicating publicly on social media or elsewhere, make sure to follow Our Code and our policies. Only authorized individuals may speak for Harley-Davidson and must clearly identify themselves as a Company spokesperson when doing so.



MAP YOUR  
ROUTE

*For further information about Harley-Davidson's communications, please see our [Electronic Communications Policy](#).*

## WHAT'S UP AHEAD?

Communication is integral to our business, but we must take care in how we use our communication resources and what messages we communicate.







**Raise the Alarm:** If you are aware of unauthorized public comments or of confidential information being communicated outside of the Company, please inform the Legal Department or the Communication and Corporate Relations Department.

**Send It On:** If you get an inquiry from someone in the media, an investor, an analyst or some other member of the public, refer the request to the Communication and Corporate Relations Department or Investor Relations.

**Raise Your Hand:** If you have questions about communication, or need help with a specific situation, please reach out to the Communication and Corporate Relations Department.

**Q:** A reporter I know from school contacted me about recent changes to our product lineup. What should I do?

**A:** You should refer the reporter to the Communication and Corporate Relations Department.





## OUR COMMITMENT TO CUSTOMERS AND COMMUNITY

We stand for the timeless pursuit  
of adventure. Freedom for the soul.  
We have a bond that brings our  
customers, employees, dealers and  
suppliers together.





# Product Quality

## Why This Matters

To deliver products and services that live up to the Harley-Davidson name and reputation, we rely on external and internal standards to create our quality and engineering processes and procedures. We have implemented systems to ensure that performance and safety are not compromised. We take quality concerns seriously and seek continuous improvement through multiple avenues, such as obtaining feedback from our employees, customers and dealers.

## Avoiding Potholes and Navigating Ethically

**New Ideas. New Improvements:** We strive for the most innovative solution because just being good enough is never good enough. We look to improve our products and services, devise new products and services and provide the systems and processes to make those improvements.



MAP YOUR  
ROUTE

*For further information about Harley-Davidson's product quality, please see our [Quality and Product Development & Operations](#) department pages.*

## WHAT'S UP AHEAD?

Customers for life—Harley-Davidson values the deep emotional connection to our customers created through our products, services and experiences. We are fueled by the brand loyalty and trust that our customers place in us to deliver quality and the promise of a fulfilling lifetime ownership experience. We exemplify this commitment by embracing a culture of personal responsibility and stewardship for quality in everything we do.







**Adherence to Process:** We always follow quality and safety procedures and processes.

**Learn and Grow:** Continuous improvement is a key aspect of our processes and procedures. We are always looking for new ways to improve our procedures, our processes and our product and service quality.

**Raise Your Hand:** If you have questions about product quality, or need help with a specific situation, please reach out to your manager, the Legal Department or the [Code of Conduct Helpline](#).

**Q:** We have an upcoming new clothing launch, but I have noticed some quality issues with the samples. Since everyone is so excited about the launch, should I do anything about my concerns?

**A:** Yes. We are all responsible for speaking up about quality issues, so please report this to your manager or the [Code of Conduct Helpline](#).

# Community Involvement and Corporate Social Responsibility

## Why This Matters

Seeking to improve the communities where we operate and live only helps our Company better accomplish our other objectives. A healthy and happy community supports our operations and creates new opportunities for both the Company and our employees. Through individual effort and the Harley-Davidson Foundation, we all seek to build a better world.

## Avoiding Potholes and Navigating Ethically

**Participate:** The Company supports

employees engaging in their communities year-round, via personal volunteering activities or through Company-organized volunteer activities.

**Support:** Harley-Davidson also supports local students through educational outreach and local revitalization efforts.

**Raise Your Hand:** If you have questions about community involvement, or need help with a specific situation, please reach out to the Human Resources Department.

## WHAT'S UP AHEAD?

Giving back to our communities fulfills a core tenet of Harley-Davidson's philosophy and exemplifies the kind of cooperative corporate responsibility our stakeholders expect and that we expect from ourselves.



MAP YOUR  
ROUTE

*For further information about Harley-Davidson's commitment to our communities please see [Our Social Impact page on The HUB](#).*



# Environmental Protection and Sustainability

## Why This Matters

By considering our environmental impact and providing sustainable products to the communities we serve, we can help protect our environment and adhere to applicable laws and regulations. As the world's largest producer of heavyweight gasoline-powered motorcycles, we are taking action to address climate change and its impact on our business by:

- Innovating the electrification of motorcycles.
- Improving the fuel economy of our motorcycles.
- Reducing the impacts from our products and operations.

## Avoiding Potholes and Navigating Ethically

**Protect the Environment:** Speak up about environmental issues.



MAP YOUR  
ROUTE

*For further information about Harley-Davidson's environmental and sustainability procedures, please see our [Environmental & Energy Policy](#).*

## WHAT'S UP AHEAD?

We are committed to complying with all applicable environmental laws and regulations, and we have set ambitious goals to minimize our environmental footprint by reducing greenhouse gas emissions, decreasing waste and limiting water and energy use at our facilities. We are committed to developing strategies that will help address the challenges that face our planet.





**Think Sustainably:** Seek ways to improve the health and welfare of our planet and our communities through the decisions you make every day. Consider sustainability in our processes, designs and products as part of our pursuit of innovation and desirability.

**Raise Your Hand:** If you have a question about environmental protection or sustainability, or need help with a specific situation, please reach out to the Human Resources Department or Inclusive Stakeholder Management Department.

**Q:** I've learned that one of our factories may be incorrectly disposing of waste material. What should I do?

**A:** Please report this to your manager, the Human Resources Department or the [Code of Conduct Helpline](#) so that we can take prompt, appropriate action to resolve the issue.



# Data Privacy

## Why This Matters

The foundation of our relationships with all our stakeholders, such as our fellow employees, applicants, customers and suppliers, is built on trust, and it is up to all of us to maintain that trust through our actions. We must also comply with our legal obligations to protect all personally identifiable information (PII) entrusted to us. If you have a new potential use for PII, you should contact the Data Privacy Office for review and guidance.

As employees, we may have access to PII of our fellow employees, customers and suppliers. It is important that we respect their privacy and use their data solely for business purposes and in a manner permitted by applicable laws and regulations. We shall

process their personal information lawfully, fairly and in a transparent manner.

## What Are Examples of PII?

PII is any information related to a person that could be used to identify that person, either directly or indirectly. It could be a person's name, photo, email address, Social Security number, phone number, date of birth, salary, bank account details, credit card details, account information or vehicle registration number. It can also include, for example, employee or applicant benefits selections, medical conditions, employment history, or other personal characteristics that could identify an individual when combined with other data. For more information, please see our [Data Classification and Handling](#) page.

## WHAT'S UP AHEAD?

We respect personal privacy and process PII lawfully and in a transparent and ethical manner. We secure the personal data entrusted to us using appropriate measures and store it only for as long as it is necessary to do so. Employee personal data can be accessed only by authorized people for business purposes or other purposes permitted by law.



MAP YOUR  
ROUTE

*For further information about Harley-Davidson's stakeholder privacy procedure, please see our [Privacy Policy for Employee & Applicant Data](#).*



### Avoiding Potholes and Navigating Ethically

**Authorized Data Use:** Make sure you properly handle customer data.

**Authorized Data Sharing:** Make sure only those with the necessary authorization can access PII.

**Raise Your Hand:** If you have any questions about employee, applicant, customer or partner personal information, or need help with a specific situation, please reach out to the Data Privacy Office.

**Q:** I saw an old high school friend at a Company event yesterday and would like to reconnect with them personally, but I didn't get their contact number. I know they are a customer, can I use our customer records to obtain their contact details?

**A:** No. You should not access customer information for personal use. The customer information we collect must be properly handled and used only for intended and disclosed business purposes.

**Q:** As part of a recent hiring process, the Human Resources Department has collected new employees' addresses and emergency contact details. Who can access the information?

**A:** Only authorized people, such as certain Human Resources representatives who need to know the information, should have access to it. If in doubt, contact the Data Privacy Office.



# Working with the Government

## Why This Matters

To meet our goals and complete our mission, we must work with and respond to government officials. When we deal with government officials, we always lead with respect, and we avoid any circumstances where we provide anything of value in exchange for government action ([see Bribery and Corruption](#)).

## Avoiding Potholes and Navigating Ethically

**Know the Rules:** We do not offer gifts or hospitality to government officials without pre-approval from the Legal Department,

except for light refreshments at a business meeting or Harley-Davidson promotional merchandise of insignificant value (e.g., coffee mugs, tote bags, pens, refrigerator magnets).

**Watch the Middlemen:** Our third-party partners', such as agents and consultants, are bound by the same rules as we are, and we can be liable for their misconduct. While we require due diligence on all third-party partners, we rely on employees to actively monitor and promptly report on any third parties that may be providing anything of value to government officials on our behalf.

## WHAT'S UP AHEAD?

As a global company, Harley-Davidson often works with government officials and organizations to execute our plans and run our operations.



MAP YOUR  
ROUTE

*For further information about Harley-Davidson's policies on government interaction, please see our [Gifts & Hospitality for Government Officials Policy](#).*





**Respond with Respect:** Operating our business can mean responding to government requests or navigating governmental processes. We always respond respectfully and accurately to government requests. We should seek guidance from the Communications and Corporate Relations Department before any non-routine interactions with government officials or when we have questions or concerns about any interactions, including any requests for information. We should seek guidance from the Legal Department prior to negotiating any terms or conditions with government officials or organizations, and prior to providing them with any information outside of an established, routine process.

**Government Work:** Before entering into any contract or agreement with a government entity or discussing any terms, please review the [Procurement Policy](#) and make sure you have consulted with the Legal Department.

**Raise Your Hand:** If you have questions about interactions with government officials or governmental organizations, or need help with a specific situation, please reach out to the Communications and Corporate Relations Department or the Legal Department.

**Q:** I've noticed that a consultant working for us overseas is billing for vague services such as "expediting fees." What should I do?

**A:** Billing for vague services is a red flag. If you notice red flags with third parties acting on behalf of Harley-Davidson, you should immediately contact the Legal Department.



# Fair Competition

## Why This Matters

Harley-Davidson is rightfully proud of our reputation, our products and services. We are in this for the long haul and don't need to take shortcuts to win business or succeed. We do not engage in non-competitive behavior and believe fair competition and antitrust laws are important to protect a functioning marketplace.

## Avoiding Potholes and Navigating Ethically

### Exercise Caution with Competitors:

Whenever we encounter our competition, whether that is in the marketplace or at industry events, we must be careful that our

engagement and conversations with them never involve discussing any agreements regarding pricing, terms or conditions of sale, production levels, suppliers, customers, market share, territories, quality, distribution or any other confidential information.

**Take Care with Competitor Data:** We make sure that we do not seek or use confidential and competitively sensitive competitor information or data, including obtaining any such confidential information from competitors directly or through unlawful means, like pressuring someone with confidentiality obligations.

## WHAT'S UP AHEAD?

What is antitrust? Antitrust or collusive behavior is when organizations make agreements or have an understanding with each other to divide markets, fix prices or otherwise engage in non-competitive behavior.



MAP YOUR  
ROUTE

*For further information about Harley-Davidson's competition policy, please see our [Antitrust Policy](#).*



**Be Mindful of Agreements and Understandings:** Our Company's relationships with dealers, distributors and suppliers can also present potential competition issues. We must avoid any agreements or understandings with our dealer network that seem to dictate resale prices, offer preferential terms or pricing, require purchasing one product to allow the sale of another product or otherwise appear to be an attempt to manipulate the marketplace.

**Raise Your Hand:** Competition law can be complex, so if you have questions about competition, or need help with a specific situation, please reach out to the Legal Department before you take any action.

**Q:** While I'm on a coffee break at a trade show, a competitor starts talking to me about a new market that both our companies are competing in. What should I do?

**A:** If you ever find yourself in a situation where the discussion with a competitor turns to information about markets, pricing or other competitive topics, end the conversation immediately and report the conversation to the Legal Department as soon as possible.



# Trade Compliance

## Why This Matters

By adhering to trade controls, we ensure that we conduct imports and exports within the requirements of the law. Violations of trade controls, sanctions and other restrictions aimed at protecting national security and foreign policy interests can lead to significant penalties, including the potential loss of export privileges, which could have a major impact on our global business.

## Avoiding Potholes and Navigating Ethically

**Trade Controls:** Ensure you comply with applicable trade controls.

**Economic Sanctions:** Ensure we don't do business with those who are subject to economic sanctions.

**Raise Your Hand:** Trade rules can be complex, so if you have any questions about trade controls, or need help with specific transactions, please reach out to the Legal Department.



MAP YOUR  
ROUTE

*For further information about Harley-Davidson's trade compliance requirements, please see our [Trade Compliance Policy](#).*

## WHAT'S UP AHEAD?

We are a global company based in the U.S. and as such, we comply with U.S. and other applicable laws and regulations for importing and exporting goods, services, software and technology. We adhere to U.S. economic sanctions and trade embargoes and other applicable international sanctions and trade embargoes. We also comply with U.S. anti-boycott laws that forbid compliance with unsanctioned foreign boycotts.





**Q:** We are considering contracting with an overseas cotton manufacturer that would produce clothing for us. Can we proceed with the deal and import the products into the U.S.?

**A:** It depends on the circumstances. As there are import restrictions on certain types of cotton (for example, based on where it is sourced), please speak with the Legal Department to review whether you can proceed.

**Q:** A prospective dealer wants to open a dealership, but I think they live in a country that is subject to U.S. economic sanctions. Can I proceed?

**A:** Please speak with the Legal Department before proceeding to confirm we can do business with the prospective dealer.



# Political Activities

## Why This Matters


Because the Company does not actively support political parties, we do not associate our personal political activity with Harley-Davidson. We also respect our co-workers by refraining from personal political activity in the workplace.

## Avoiding Potholes and Navigating Ethically

**Political Support:** Refer political queries to the Government Affairs Department.

**Political Activity:** Do not support political positions in the name of Harley-Davidson.

**Raise Your Hand:** If you have any questions about personal or corporate political activities, or need help with a specific situation, please reach out to the Government Affairs Department.



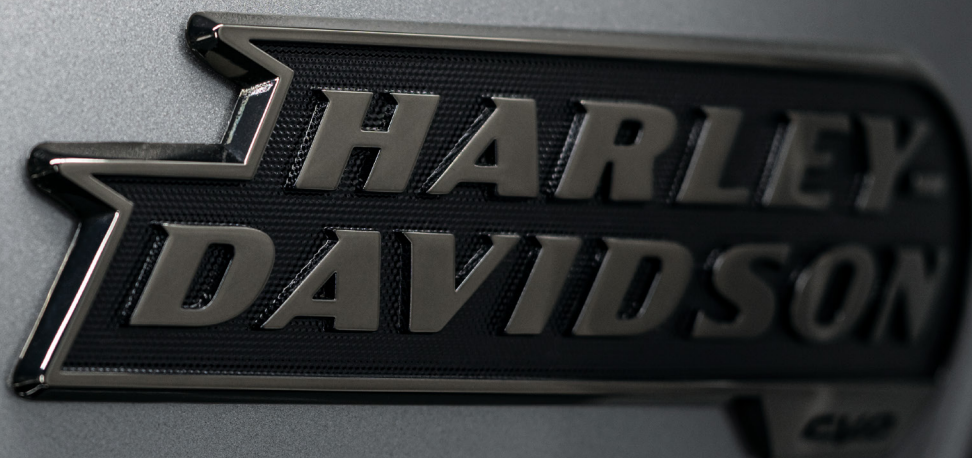
MAP YOUR  
ROUTE

For further information about Harley-Davidson's political activities procedure, please see the [Appropriate Communications](#) section.

## WHAT'S UP AHEAD?

We do not take personal political positions or support candidates in the name of Harley-Davidson or use Company funds to do so. We do not lobby on behalf of Harley-Davidson but rather support political activities on our own time with our own resources.





**Q:** What does the Government Affairs Department do?

**A:** The department builds relationships with government officials and organizations regarding laws, regulations, policies and issues that impact our business, in addition to approving certain politically related activities.

**Q:** I'm speaking at a local political rally. In my introduction, is it OK to mention that I work for our Company?

**A:** No. While we are all encouraged to get involved in our communities, it is important to show that we are expressing our personal views and carrying out political work on our own behalf, not in the name of our Company.





## SOLVING PROBLEMS ETHICALLY

Challenges are what this Company is built on. We've seen them before, and we will no doubt see them again, but we are always guided by our ethics.



# Our Code. Our Responsibilities.

Our Code applies to all employees of Harley-Davidson, Inc. and its subsidiaries, members of the Company's board of directors and third parties representing Harley-Davidson, Inc. and its subsidiaries.

We all play an important role in ensuring compliance at Harley-Davidson. We all must follow Our Code and policies, model ethical behavior, be prepared to ask questions and report any concerns.

Harley-Davidson complies with all applicable laws and regulations everywhere we do business. In countries where the applicable law is less restrictive than Our Code or our policies, we follow Our Code or our policies. Additionally, employees of Harley-Davidson Financial Services, Inc. and other affiliates must comply with any stricter provisions that

exceed what the Harley-Davidson Code or policies may provide.

Our reputation and our success are on the line when we fail to act ethically or we violate Our Code, our policies or the law—and violations can lead to severe consequences for both the Company and employees, including termination of employment and civil and criminal penalties.

Managers have special responsibilities to ensure that there is an open door that invites employees to discuss concerns, to convey and model our zero tolerance for retaliation and to educate employees on the resources available to them.

Our Code cannot be waived unless the Chief Legal Officer or the Company's board of directors approve such a waiver.

## WHAT'S UP AHEAD?

Our Code applies to all employees of Harley-Davidson, Inc. and its subsidiaries, members of the Company's board of directors and third parties representing Harley-Davidson, Inc. and its subsidiaries.

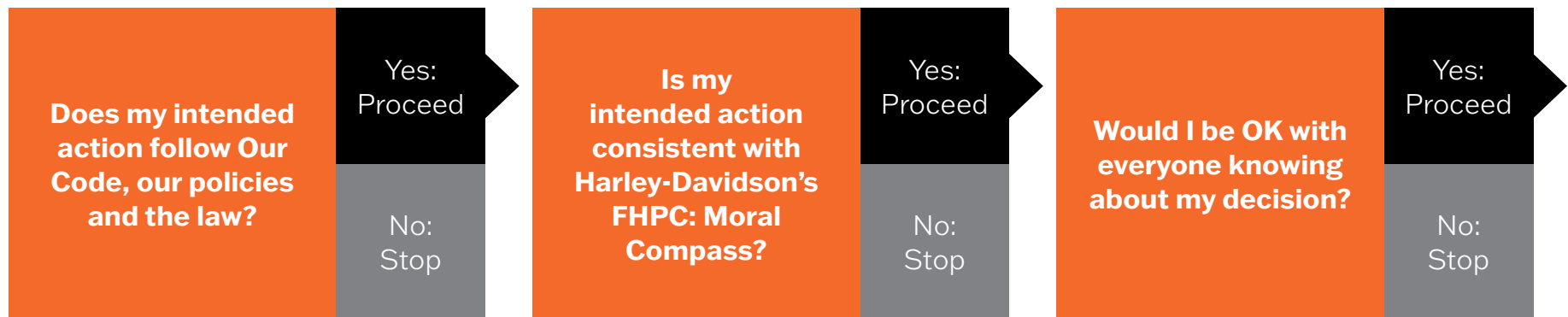




# Making the Right Move

While Our Code covers a lot of ground, it cannot possibly cover every possible issue or question we face. All of us have choices to make when we are working for Harley-Davidson, and sometimes those decisions don't have easy answers.

When faced with this situation, it is important that we always ask ourselves:



If you can answer “YES” to each of these questions, then you are probably on the right track. If you aren't sure the answer is “YES,” or if you think the answer might be “NO,” then you should seek guidance from your manager or one of the other resources listed in Our Code.

# How We Speak Up

We all have a responsibility to help protect our reputation and success. If you have questions or concerns or believe there has been a violation of Our Code or any Harley-Davidson policy, you should speak up.

## You Can Get Answers or Report Concerns by:

- Speaking with your manager or Human Resources representative
- Contacting the Legal Department, Internal Audit or the Harley-Davidson, Inc. Compliance Officer or Chief Legal Officer
- Using the Code of Conduct Helpline. The confidential Helpline is available anytime, around the world, and depending on the country in which you reside, you can choose to report anonymously.
  - Online: [www.h-dcodehelpline.com](http://www.h-dcodehelpline.com).
  - Telephone: from inside the United States: 855-318-5389
  - Telephone: from outside the United States: use the numbers on the right

REGION	CONTACT NUMBER
Australia	1-800-339276
Austria	0800-291870
Belgium	0800-77004
Brazil	0800-8911667
Canada	1-855-318-5389
China	4001205041
Czech Republic	800-142-550
England	0800-032-8483
France	0800-902500
Germany	0800-1016582
India	000-800-100-1071 000-800-001-6112
Italy	800-786907
Japan	00531-121520
Mexico	001-800-840-7907 001-866-737-6850
The Netherlands	0800-0226174
Singapore	800-1204201
Spain	900-991498
Switzerland	0800-562907
Thailand	ITFS: 1-800-011-772 AT&T Direct Dial Access: 1. Dial 1-800-000-133. 2. At the prompt dial 855-318-5389.
United States	1-855-318-5389

\*If you are unable to connect to the phone numbers listed, your mobile provider may not offer connectivity to the phone helpline. Please submit your concern using the "Report a Concern Online" intake form at [h-dcodehelpline.com](http://h-dcodehelpline.com).





# How We Investigate and Respond

Harley-Davidson, Inc. investigates every report fairly and appropriately and takes necessary action for any violations of Our Code or our policies. Investigations are confidential, and the Company expects all parties involved to maintain the confidentiality of the investigation. To preserve confidentiality to the greatest extent, managers are not typically informed that an investigation involving their direct report is underway. Furthermore, employees are not required to disclose any information related to an investigation to their managers and, in certain instances, may be prohibited from doing so if special confidentiality requirements apply to the investigation.

Employees shall cooperate fully and honestly with any Company investigation. Employees must never knowingly provide false or misleading information in connection with a report or investigation. Any employee who fails to cooperate with or provides false information during a Company investigation will be subject to discipline up to and including termination of employment.

We do not tolerate any retaliation against someone who makes a report in good faith about a concern, or who cooperates with or participates in any investigation. If you have been the subject of retaliation or have observed retaliation either in person or online, report it to your manager, a Human Resources representative or the Code of Conduct Helpline.





**Harley-Davidson, Inc.**  
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[harley-davidson.com](http://harley-davidson.com)