



Anti-Corruption Policy

Applies To

This policy applies to GATX, all GATX subsidiaries and affiliates worldwide, majority-owned joint ventures, and all GATX personnel and intermediaries.

Policy Statements

Anti-Corruption Compliance - It is the policy of GATX Corporation (“GATX” or the “Company”) to conduct all business transactions in an ethical and honest manner in every country where we operate. Bribery and corruption violate the public's trust, threaten national and international economic and social development and undermine security. GATX therefore takes a zero-tolerance approach to bribery and corruption. We do not pay or accept bribes, and we do not, directly or indirectly, authorize paying or accepting bribes. Accordingly, GATX personnel, global intermediaries, and any other third parties doing business on behalf of GATX shall not, in any way, participate in bribery or corruption in the conduct of the Company’s business activities.

Accurate Books, Records and Accounts – As a US public company, GATX is required to maintain accurate books, records and accounts. All GATX personnel shall ensure that all entries in the Company’s books, records and accounts accurately and fairly reflect the transactions and dispositions of the Company’s assets, in reasonable detail. In addition, all GATX personnel must ensure that all Company transactions are performed in accordance with management’s general or specific authorization, and are recorded both to permit preparation of financial statements in conformity with generally accepted accounting principles and to maintain accountability for GATX assets.

Key Concepts

Our Anti-Corruption Policy covers the following key concepts:

- Guidelines regarding gifts, business meals, and travel, lodging and entertainment for Government officials
- Guidelines for gifts, meals, and entertainment for private sector recipients
- Prohibition on making facilitation payments
- Global Intermediary retention and compliance with GATX Global Intermediaries Procedure
- Guidelines regarding non-U.S. charitable donations and political contributions
- Annual anti-corruption compliance training and certification of anti-corruption policy and related anti-corruption questionnaire to GATX employees
- Guidelines related to international joint ventures
- Mergers and acquisitions and due diligence required to address corruption risks
- Responsibilities of Chief Compliance Officer, General Counsel and Chief Financial Officer in connection with the GATX Anti-Corruption Policy
- Duty to report violations of the GATX Anti-Corruption Policy, process for reporting, and non-retaliation policy



GATX Corporation

Every employee at GATX has a duty to comply with the GATX Anti-Corruption Policy and to report any suspected violations to the Company. Reports can be made to Company management, the Legal or Compliance departments, the GATX Ethics & Compliance Portal (by telephone at 1-800-461-9330 or by internet at www.convercent.com/report), or the Audit Committee of the GATX Board of Directors, which has oversight over GATX's anti-corruption program. Where permissible under local law, the GATX Ethics & Compliance Portal permits reports to be submitted anonymously.

GATX prohibits retaliation against any employee who seeks advice, makes a good faith report of alleged wrongdoing or participates in an investigation. Suspected retaliation should be reported immediately. Individuals who retaliate will be disciplined, which could include termination of employment.