Anti-Corruption Policy

APPLIES TO

This policy applies to GATX, all of GATX's worldwide subsidiaries and affiliates, majority owned Joint Ventures, and all GATX personnel and intermediaries.

KEY CONCEPTS

GATX's 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 Procedures
- Guidelines regarding Non-U.S. Charitable Donations and Political Contributions
- Guidelines related to International Joint Ventures
- Mergers and acquisitions and due diligence required to address corruption risks
- Duty to report violations of the Anti-Corruption policy, process for reporting, and non-retaliation policy

POLICY STATEMENTS

Anti-Corruption Compliance - GATX Corporation ("GATX" or the "Company") conducts all business transactions in an ethical and honest manner in every country in which it operates. 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. GATX does not pay or accept bribes, or directly or indirectly authorize paying or accepting bribes. GATX personnel, 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.

GATX is a global company, and our business is subject to the laws of the countries where we operate. As a U.S. Company, we comply with the U.S. Foreign Corrupt Practices Act ("FCPA") wherever GATX does business. In addition, we are subject to various laws prohibiting GATX personnel and any other person or entity acting on GATX's behalf from paying bribes or kickbacks to the employees of private sector businesses in order to induce them to award business to GATX. Violations of these commercial bribery laws can result in criminal fines and penalties for GATX, GATX personnel, and/or others acting on behalf of GATX.

Accurate Books, Records and Accounts - As a U.S. Public Company, GATX is required to maintain accurate books, records and accounts. All Company transactions must be appropriately authorized and recorded to permit preparation of financial statements in conformity with generally accepted accounting principles and to maintain accountability for GATX assets.

Every employee at GATX has a duty to comply with the Anti-corruption Policy, and to report to the Company any suspected violations. Reports can be made to Company management, the Legal / Ethics & Compliance Departments, the Company's Ethics & Compliance Portal (or by telephone at 1-800-461-9330), and 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.