

Introduction

AGCO Corporation (the “Company”) seeks to facilitate disclosure regarding accounting and auditing matters or any other conduct that is in breach of the law or a violation of the Company's Global Code of Conduct (“Allegations”) while encouraging proper individual conduct. AGCO's Audit Committee has approved the following procedures for the receipt, retention and treatment of Allegations received by the Company, and for the confidential and anonymous submission by employees or external third parties of related concerns.

AGCO will not discriminate against or otherwise treat anyone less favorably for reporting Allegations in good faith, participating in an investigation, or otherwise engaging in conduct in respect of which they are protected by law.

Procedures for Allegations

A. Scope of Matters Covered

These procedures relate to Allegations, which can include, without limitation, the following:

- **Violation of the Supply Chain Due Diligence Act (LkSG)**
 - Human rights related risks or the violation of human rights related obligations in the context of supply chains: adverse effects of business activities on human rights, in particular human rights risks for those potentially affected by business activities.
 - Environmental risks or the violation of environmental obligations in the context of supply chain: in particular risks that lead to danger to people and the environment.
- **Financial and Business Integrity:**
 - **Accounting and Auditing Practices:** Statements or actions that violate or conflict with either internal policies, procedures, or practices or government regulations related to the detailed reporting of the financial state or transactions of an organization or the examination, verification, or correction of its financial accounts.
 - **Conflict of Interest – Financial:** Any financial interest, any business or professional activity, prior or current employment, or any obligation that may interfere with the ability to objectively perform job duties and responsibilities or impair independence and objectivity.
 - **Gifts, Bribes and Kickbacks:** Payments, payments in kind, gifts, bribes, extensions of credit or benefits extended to or received by customers, employees, suppliers, vendors, competitors, directors, officers, auditors, government employees, government officials or agencies, or other parties that are unlawful, improper, or designed to influence business decisions or political processes.
 - **Trading on Inside Information:** The purchase or sale of stock or other securities based on non-public and material information obtained during the course of employment or providing such information to another person who purchases or sells stock or other securities based upon that information.
- **Diversity, Equal Opportunity and Respect**
 - **Discrimination:** Statements or actions based on age, race, color, national origin, sexual orientation, gender, disability, religion, or any other characteristic protected by law.
 - **Harassment – Sexual:** Statements or actions expressing unwelcome sexual

advances, requests for sexual favors, unsolicited physical contact or propositions, unwelcome flirtations, or offensive verbal or visual expressions or physical conduct of a sexual nature.

- **Harassment:** Persistent statements, conduct or actions that are uninvited, degrading, offensive, humiliating or intimidating and create an unpleasant or hostile environment.
- **Retaliation or Retribution:** Statements or actions threatening, harassing or discriminating against a third party because of any lawful act taken by such a third party in connection with reporting a violation of law or policy, filing a complaint, or assisting with an investigation or proceeding.

- **Environmental, Health and Safety**

- **Environment, Health and Safety:** Conduct, actions, policies or practices that either violate local, provincial or federal environmental, health or safety laws or regulations or may cause or result in potentially hazardous conditions that impact the environment or health or safety.
- **Substance Abuse:** The unlawful use, possession, sale, conveyance, distribution, concealment, transportation or manufacture of illegal drugs, intoxicants, controlled substances or drug paraphernalia in the workplace or while conducting business.
- **Threats and Physical violence:** Statements or actions that threaten acts of violence or the presence of weapons, firearms, ammunition, explosives or incendiary devices in the workplace, on work premises or in work vehicles.

- **Human Rights**

- **Child labor, forced labor, slavery, or other cruel, inhuman or degrading treatment:** This includes any work, or services people are forced to do against their will, usually under threat of punishment or when a child is exploited for someone else's gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery.
- **Disregard of occupational health and safety obligations:** Long-term or short-term hazard experienced in the workplace that may lead to damage, including chemical hazards, biological hazards, psychical hazards and physical hazards. Examples include inadequate safety standards, the absence of protective measures, absence of measures to prevent physical and mental fatigue, and inadequate training and instructions.
- **Environmental pollution affecting human rights:** For example, causing harmful soil contamination, water or air pollution, harmful noise emission or excessive water consumption, in cases where these actions substantially impair the natural basis for the preservation and production of food, deny a person access to safe drinking water, impede or destroy a person's access to sanitary facilities or harm a person's health.
- **Excessive use of force by security forces:** If excessive force is used by security forces in violation with human rights.
- **Land deprivation:** Unlawful occupation and deprivation of land, forests or water bodies that serve to secure livelihoods, for the purpose of acquisition, construction or other uses.

- **Misuse or Misappropriation of Assets or Information**

- **Customer Relations:** Statements or actions that are negatively impacting or interfering with customers, customer relationships or customer agreements.
- **Disclosure of Confidential Information:** The unauthorized or illegal disclosure, copying, duplication, misuse or release of confidential or personal data including but not limited to employment, financial, medical and health, customer lists, contracts, business plans, personnel records or other property marked or generally regarded as confidential or trade secrets.
- **Fraud or Embezzlement:** Deliberate deception to obtain unfair or unlawful personal gain, including theft or diversion of funds by falsifying documents or accounting

- records.
- **Misuse of Resources:** The improper, unauthorized or unlicensed use of property or resources for non-business-related reasons or purposes including improper use of systems and timekeeping.
- **Theft:** The unauthorized removal or taking of supplies, equipment, furniture, fixtures, products, cash, merchandise or other tangible property.
- **Policy and Process Integrity**
 - **Antitrust or Fair Trading:** Discussions or agreements with competitors about prices or credit terms, submission of bids or offers, allocation of markets or customers, restrictions on production, distribution or boycotts of suppliers or customers that would result in monopolization or anticompetitive markets.
 - **Espionage or Sabotage:** Actions that result in the gathering, receipt or acceptance of non-public confidential information or trade secrets about competitors to gain a competitive advantage or the deliberate destruction, disruption or damage to a competitor's equipment or property for competitive advantage or gain.
 - **Falsification or Destruction of Information:** Statements or actions that encourage or result in unlawful, untimely, false or intentional misrepresentation, concealment or destruction of information in order to deceive or mislead.
 - **Quality Control:** Complaints about product or service quality or effectiveness; allegations of product tampering; violation of policies and practices for manufacturing controls; allegations of non-compliance with product standards or service delivery.
- **Other**
 - **Guidance Request:** Request for guidance, interpretation, or other information regarding matters of law, regulations, or policies.
 - **Other:** Statements actions or policies that concern the caller but are not currently resulting in harm, injury or corporate liability and cannot be included in any other category.

A person may also use the “Ask a Question” option instead of reporting an Allegation. In such case, the Company will assess the question and provide an answer. The Company may elect to reclassify the question as an Allegation if it raises a concern of inappropriate behaviors outlined above.

B. Submission and Receipt of Allegations

Anyone who has Allegations to raise may, submit them confidentially (and anonymously if they elect this option) by using the AGCO Alertline provided by NAVEX. The NAVEX Global Alertline webform and telephone numbers can be found at:

<https://secure.ethicspoint.com/domain/media/en/gui/83584/index.html>. NAVEX Global is an independent third party that the Company has hired to receive Allegations and coordinate the delivery of such Allegations to the appropriate company personnel.

C. Content of Allegations

To assist the Company in the response to or investigation of an Allegation, the Allegation should be factual rather than speculative, and contain as much specific information as possible to allow for proper assessment of the nature, extent and urgency of the matter that is the subject of the Allegation. It is less likely that the Company will be able to conduct an investigation based on an Allegation that contains unspecified wrongdoing or broad allegations without verifiable evidentiary support. Without limiting the foregoing, the Allegation should, to the extent possible, contain the following information:

- The alleged event, matter or issue that is the subject of the Allegation;

- The name of each person involved;
- If the Allegation involves a specific event or events, the approximate date and location of each event; and
- Any additional information, documentation or other evidence available to support the Allegation.

D. Treatment of Allegations

Once received, the Allegation will be assigned to the appropriate personnel for investigation.

The reporting individual will receive a system generated notification of the receipt of the Allegation and a numeric key that enables them to log into the Alertline to monitor the status of the Allegation. The reporter is recommended to maintain details of the key until the receipt of notice of closing the investigation as the investigator may send additional information requests using the Alertline functionality.

The following is a list of those functions within AGCO that have lead investigative responsibility (along with a description of their role):

- **Ethics and Compliance Department** - has overall responsibility for oversight of all inquiries; receives copies of all reports, leads the investigation of reports alleging criminal activities, price fixing, improper loans to executives, insider trading and release of proprietary information;
- **Human Resources** - receives and leads investigations of reports regarding customer relations, discrimination, employee retaliations, policy issues, retaliation against whistleblowers, safety issues and sanitation, sexual or other harassment, substance abuse and wage/hour issues;
- **Internal Audit** - receives and leads investigations of reports alleging financial irregularities, including accounting and audit concerns, conflicts of interest, falsification of Company records, fraud and theft of goods and services; and,
- **Quality** - receives and leads investigations of reports alleging product quality concerns.

E. Confidentiality/Anonymity

Allegations where the reporter has not chosen to report anonymously

The Company shall maintain the confidentiality of the person making the Allegation to the extent reasonably possible within the legitimate needs of law and of any ensuing evaluation or investigation. Legal or business requirements may not allow for complete confidentiality.

Allegations where the reporter has chosen to report anonymously

If reporter chooses to submit their Allegation anonymously, the Alertline is technically set up in a manner that does not enable identification through technical measures. NAVEX does not generate or maintain any internal connection logs with IP addresses, so no information linking Reporter PC to NAVEX is available. In addition, persons submitting Allegations anonymously should be cautioned that their identity might become known indirectly as a result of data they have share in their Allegation.

The identity of other persons subject to or participating in any inquiry or investigation relating to an Allegation shall be maintained in confidence subject to the same limitations set out above.

Please note that in some cases it may not be possible to proceed with or properly conduct an investigation unless the person reporting the Allegation identifies himself or herself due to the difficulty of interviewing anonymous complainants and evaluating the credibility of their Allegations.

F. Data Privacy and Data Transfer

The Company uses a third-party provider NAVEX for the Alertline services to ensure confidentiality. NAVEX is a United States based company and stores all of the information submitted to them in the United States, which means there will be a data transfer to the United States. This transfer is covered by Standard Contractual Clauses (SCCs).

G. Response time

The Company shall respond to any Allegations raised within a reasonable time, and in any event within the timeframes prescribed by applicable laws. Please note that investigation timelines are likely to vary depending on the complexity of the Allegation, the availability of witnesses/implicated and on how much evidence the reporter has been able to provide.

H. Protections from Retaliation

Raising or helping to address an integrity concern takes courage. AGCO will not tolerate retaliation against anyone for reporting in good faith what he or she reasonably believes to be a valid Allegation, or for assisting in the investigation of an Allegation. The Company shall not discriminate against or otherwise treat anyone less favorably for reporting Allegations in good faith, providing information or otherwise participating in a related investigation, or otherwise engaging in conduct in respect of which they are protected by law such as that specified in Section 806 of the Sarbanes-Oxley Act of 2002. An individual's right to protection from retaliation does not extend to immunity for any complicity in the matters that are the subject of the Allegation or an ensuing investigation.

I. Reports to governmental and regulatory authorities

These procedures are in no way intended to limit the rights of individuals to report alleged violations relating to accounting or auditing matters to proper governmental and regulatory authorities.