



Business Practice and Ethics

2.7 Anti-Corruption Policy

Purpose

To reduce the risk of corruption and bribery occurring in the operation of Rush Enterprises, Inc. and its subsidiaries (collectively, the “Company”).

Policy

The Company operates in a wide range of legal and business environments, many of which pose challenges to its ability to conduct business operations with integrity. The Company strives to conduct its operations in accordance with the Rush Driving Principles and the highest standards of ethical conduct. The Company seeks to avoid even the appearance of impropriety in the actions of its directors, officers, employees, and agents.

Accordingly, this Anti-Corruption Policy (this “Policy”) reiterates the Company’s commitment to always act with integrity and explains the specific requirements and prohibitions applicable to the Company’s operations under anti-corruption laws, including, but not limited to, the U.S. Foreign Corrupt Practices Act of 1977 (the “FCPA”) and Canada’s Corruption of Foreign Public Officials Act (“CFPOA”).

A. Definitions

1. “Government Official” means any of the following:
 - i. Officers or employees of a government or any department, agency, or instrumentality thereof.
 - ii. Officers or employees of a company or business owned in whole or in part by a government (a state owned or controlled enterprise).
 - iii. Officers or employees of a public international organization (such as the Red Cross, United Nations, World Bank, or the European Union).
 - iv. An official of a political party or candidate for political office.
 - v. Individual who is considered a Government Official under applicable local (non-U.S.) law.
 - vi. An individual acting on behalf of any Government Official.
2. “Anything of Value” means money or anything that has value to the recipient, such as:
 - i. Gifts;
 - ii. Travel, meals, lodging, entertainment, or gift cards;
 - iii. Loans;
 - iv. Charitable or political donations; or



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- v. Business, employment, or investment opportunities.
3. "Bribery" or "Bribe" means directly or indirectly making, promising, authorizing, or offering Anything of Value on behalf of the Company to secure an improper advantage, obtain or retain business, or direct business to any other person or entity.
4. "Kickback" means a scheme that arises when a third-party pays part of their fees to the individuals who give them the contract or some other business advantage.
5. "Facilitation Payment" means a payment to a low-level Government Official that is intended to encourage the Government Official to perform his or her duties.

B. Prohibited Payments

1. Directors, officers, employees, and agents of the Company are prohibited from engaging in Bribery. This prohibition includes payments to third parties where the Company director, officer, employee, or agent knows or has reason to know, that the third-party will use any part of the payment for a Bribe.
2. Examples of prohibited payments include but are not limited to:
 - i. Cash and cash equivalents (gift cards);
 - ii. Payments-in-kind (favors);
 - iii. Unofficial fees (fees not on a fee schedule);
 - iv. Kickbacks; and
 - v. Facilitation Payments.
3. On occasion, a Government Official may attempt to solicit or extort improper payments or anything of value from Company directors, officers, employees, or agents. Such directors, officers, employees, or agents must inform the Government Official that the Company does not engage in such conduct and immediately contact the Company's Ethics and Compliance or Legal Department.
4. If a Facilitation Payment is requested, report the request to the Ethics and Compliance or Legal Department.
5. Bribery involving commercial parties (non-governmental parties) is also prohibited under this Policy. To this end, employees and agents of the Company shall not offer, promise, authorize the payment of, or pay or provide Anything of Value to any employee, agent, or representative of another company to induce or reward the improper performance of any function or any business-related activity. Company employees and agents also shall not request, agree to receive, or accept Anything of Value from any employee, agent, or representative of another company or entity as an



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inducement or reward for the improper performance of any function or business-related activity. For more information, reference Section C.3 of the Employee Handbook 5.1 – Ethics and Conflicts of Interest.

C. Permitted Payments

1. *Promotional Hospitality and Marketing Expenses or Pursuant to a Contract.* The Company may pay for the reasonable cost of a Government Official's meals, lodging, or travel if, and only if, the expenses are bona fide, reasonable, and directly related to the promotion, demonstration, or explanation of the Company's products or services, or the execution of a contract with a government or government agency.
2. *Promotional Gifts.* Promotional gifts of nominal value may be given to a Government Official as a courtesy in recognition of services rendered or to promote goodwill. These gifts must be nominal in value and should generally bear the trademark of the Company or one of its products.
3. For more information, reference Section C.3 of the Employee Handbook 5.1 – Ethics and Conflicts of Interest.

D. Anti-Money Laundering

1. Money Laundering occurs when an individual knowingly takes money derived from illegal activity and converts it into some other form.
2. The Company prohibits the acceptance of money derived from illegal activity, regardless of the dollar amount, in any transaction.
3. Suspected money laundering should be reported to the Company's Ethics and Compliance Department.
4. Cash transaction reporting requirements must be followed as required by law.

E. Political and Charitable Contributions

Contributions to candidates for political office outside of the U.S. or Canada are prohibited unless the General Counsel, with the assistance of the Legal Department, pre-approves them in writing. Charitable contributions to charities located outside of the U.S. or Canada must also be pre-approved in writing by the General Counsel. For more information, refer to Company Policy 2.10 – Political Contributions.

F. Record Keeping

It is the Company's policy to implement and maintain internal accounting controls based upon generally accepted accounting principles. All accounting entries in the Company's books and records must be timely and accurately recorded and include reasonable detail to fairly reflect transactions. These accounting entries and the supporting documentation must be periodically



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reviewed to identify and correct discrepancies, errors, and omissions.

1. *Authorization for Transactions.* All transactions involving the provision of Anything of Value to a Government Official must occur only with appropriate authorization.
2. *Recording Transactions.* All transactions involving the provision of Anything of Value to a Government Official must be recorded in accordance with generally accepted accounting principles.
3. *Tracking Transactions.* All transactions involving the provision of Anything of Value to a non-U.S. or non-Canadian Government Official must be tracked by the Corporate Controller in a separate log or record, with supporting documentation identifying the following:
 - i. The name and position of the employee requesting and authorizing the transaction;
 - ii. The name and position of the non-U.S. or non-Canadian Government Official involved in the transaction; and
 - iii. A description, including the value, of the payment or provision of Anything of Value, and where applicable, a description of the Company's products or services being promoted or the relevant contractual provision if the payment was made pursuant to a contract.
4. *Recording Gift and Entertainment Transactions in Concur.* All gifts and entertainment involving Government Officials must be properly recorded in the Concur web portal using the appropriate designation for a Government Official. For more information, reference Section C.3 of the Employee Handbook 5.1 – Ethics and Conflicts of Interest and Employee Handbook 4.5 – Travel and Entertainment Expense.

G. Representatives

All third-party representatives of the Company must fully comply with the FCPA, CFPOA, and all other applicable laws.

H. Compliance

Directors, officers, employees, and agents of the Company must be familiar with and perform their duties according to the requirements set out in this Policy. Directors, officers, employees, or agents of the Company who violate this Policy are subject to disciplinary action, up to and including termination. Third-party representatives of the Company who violate this Policy may be subject to termination of all commercial relationships with the Company. To ensure that all directors, officers, employees, and agents of the Company are thoroughly familiar with the provisions of this Policy, the FCPA, CFPOA, and any other applicable anti-corruption laws, the Company shall provide anti-corruption training and resources to directors, officers, employees,



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and agents of the Company, as appropriate.

Any director, officer, or employee, or agent of the Company who suspects that this Policy may have been violated must immediately notify the Company as specified in the section entitled "Reporting Policy Violations" below. Any director, officer, employee of the Company who, in good faith, reports suspected legal, ethical, or violations of this Policy will not suffer any adverse consequence for doing so. When in doubt about the appropriateness of any conduct, the Company requires that you seek additional guidance before taking any action that may subject the Company to potential liability under the FCPA, CFPOA, or for violation of other anti-bribery laws.

I. Duty to Cooperate

The Company may undertake a more detailed review of certain transactions. As part of these reviews, the Company requires all directors, officers, employees, agents, and third-party representatives of the Company to cooperate with other employees of the Company conducting the review, including outside legal counsel, outside auditors, or other similar parties. The Company will view the failure of any director, officer, or employee to cooperate in an internal review as a breach of such person's obligations to the Company and will deal with this failure severely in accordance with any local laws or regulations.

J. Additional Resources

1. Employee Handbook 4.5
2. Employee Handbook 5.1
3. Company Policy 2.10 – Political Contributions

K. Guidance

For more information about this policy contact your supervisor or the Ethics and Compliance Department at EthicsandCompliance@RushEnterprises.com.

L. Reporting Policy Violations

Suspected violations of this Policy can be reported to your immediate supervisor, department manager, manager, or to the Company's Chief Compliance Officer. Suspected violations may also be reported to the Ethics and Compliance Department or anonymously via the Ethics Helpline at 844-825-9484 or via RushEthics.com.