



Business Practice and Ethics

2.10 Political Contributions

Purpose

To ensure that political and campaign contributions, including through industry associations and lobbying on behalf of the Company, are consistent with the Company's core values, are made only by authorized individuals, and meet the Company's internal guidelines and applicable legal requirements.

Definitions

1. A "Political Contribution" is any gift, loan, advance or deposit of money, or anything of value made: (i) for the purpose of influencing any federal, state, provincial, or local election for political office or ballot initiative in the United States or abroad; or (ii) to pay a debt incurred in connection with any election or ballot initiative.
2. An "Industry Association" is any trade and industry association or coalition that is engaged in political activity.

Policy

A. Political Activities of Employees

1. While Company employees may participate as individual citizens in the political process, decisions to do so are entirely personal and voluntary. Employees engaging in political campaign activities are expected to do so as private citizens. They must always make clear that their views and actions are their own, not those of the Company. Employees must not use their position with the Company to coerce or pressure other employees to contribute to, or support or oppose any political candidates, elections, or ballot initiatives.
2. Employees engaging in political activities must also adhere to the applicable provisions of the Rush Driving Principles.

B. Contacts with Government Representatives

1. Company employees must promptly consult the Company's Legal Department or the Ethics and Compliance Department on issues that involve federal, state, provincial, and local government. Only Company officers and those authorized by Company officers may express the Company's views on legislation, ballot initiatives, regulations, or government action. Other employees may communicate the Company's views only with the specific authorization of the Company's Chief Executive Officer, Chief Financial Officer, or General Counsel (collectively, the "Officers") and with the assistance of the Legal Department.

C. Corporate Political Contributions, Lobbying, and Industry Associations Philosophy



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1. Public policy issues have the potential to impact the Company's business, its employees, business partners, shareholders, and the communities in which the Company operates. The Company's management believes that in certain cases, it may be appropriate and in the Company's best interests to use its resources to:
 - i. Make Political Contributions to political parties, candidates for public office, or political organizations;
 - ii. Contribute or pay membership fees to Industry Associations; or
 - iii. Engage external registered lobbyists to assist the Company in monitoring governmental policy development, advising the Company, or communicating the Company's positions on various political issues.
2. The Company has adopted this Policy to ensure that Political Contributions, Industry Association contributions, and lobbying efforts are made in a manner consistent with the Company's core values to protect or enhance shareholder value, without regard to the private political preferences of Company officers. Any Company funds, regardless of the source of the funds, for Political Contributions or contributions to Industry Associations or lobbying must follow this Policy's approval guidelines.
3. *Independent Expenditures and Electioneering Communications.* In 2010, the United States Supreme Court ruled in Citizens United v. Federal Election Commission that U.S. corporations may not be prohibited generally from using their funds to pay for certain independently made partisan political advertisements and other political communications referred to as "independent expenditures" and "electioneering communications." Notwithstanding the Supreme Court's decision, the Company will not make direct independent expenditures or pay for any electioneering communication in federal campaigns, as those terms are defined by applicable law, without the approval of all the Officers.
4. *Political Contribution Approval Guidelines.*
 - i. Any Political Contribution made by the Company, regardless of the source of the funds, must be approved in advance by one of the Officers and must support a political candidate, political party, or ballot initiative that such Officer determines is beneficial to the long-term business interests of the Company. In determining whether or not to approve a request to make a Political Contribution, the Officer may examine many factors, including, but not limited to, the merits of the candidate, election or ballot initiative, the value of the contribution to the election or ballot initiative, the quality and effectiveness of the organization to which the contribution will be made, and the appropriateness of the Company's level of



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- involvement in the election or ballot initiative. Further, the Officer shall also, as may be appropriate, consult with the Company's legal counsel, compliance personnel, and members of management.
- ii. Company funds should not be used for contributions related to a U.S. federal election (whether to a candidate, political party, or political action committee) because it may be against the law. In some cases, Company funds may be used to support some federal political activity, but such contributions and expenditures must be approved in advance by the General Counsel.
 - iii. In addition to the approval by an Officer, any Political Contributions to a single candidate, political party, or ballot initiative that will aggregate to more than U.S. \$100,000 in a calendar year require the approval of the General Counsel.
 - iv. All Political Contributions must comply with:
 - a. this Policy;
 - b. the Rush Driving Principles;
 - c. the Company's Policy on Gifts and Entertainment;
 - d. the Foreign Corrupt Practices Act; and
 - e. all other applicable laws and regulations in the jurisdictions in which the contributions are made.
5. *Lobbying Oversight.* The Company may, from time to time, directly engage external registered lobbyists to assist the Company in monitoring governmental policy development, advising the Company, or communicating the Company's positions on various political issues that concern the long-term business interests of the Company. Only an Officer or the Legal Department may engage external registered lobbyists or firms who advise on governmental affairs issues. The Company will make all required public disclosures regarding lobbying activity.
6. *Industry Association Approval Guidelines.* Membership fees or contributions to an Industry Association engaged in political activities, including lobbying or an Industry Association Political Action Committee ("PAC") must be approved in advance by an Officer or the Legal Department and must support objectives that the Officer or Legal Department determines are beneficial to the long-term business interests of the Company.
7. *Payment and Documentation of Expenditures.* Approved payments of Political Contributions, fees, or contributions to Industry Association political activities or



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lobbying activities should be paid directly by Corporate Accounting and must accurately and with reasonable particularity describe the recipient and purpose of the expenditure. If pre-approved payments to an Industry Association are made directly by an employee, the submission of expenses for reimbursement must accurately and with reasonable particularity describe the recipient and purpose of the expenditure.

8. *Reporting.* The Company shall always comply with all current applicable laws and regulations relating to the reporting requirements of corporate Political Contributions.

D. Guidance

For more information about this policy contact the Legal or Ethics and Compliance Department.

E. How to Report Suspected Violation

Suspected violations of this policy can be reported to your immediate supervisor, department head or manager. Suspected violations may also be reported to the Legal or Ethics and Compliance Department, or anonymously via the Ethics Helpline at 844-825-9484 or via RushEthics.com.