



GATX Corporation

Code of Business Conduct and Ethics

Letter from the Chairman

Dear Colleague,

GATX Corporation has a long history of providing outstanding products and services with honesty and integrity. Operating our business with high ethical standards is extremely important as a reputation for integrity and fair dealing is a valuable asset. As GATX strives to be recognized as the finest railcar leasing company in the world by its customers, its shareholders, its employees and the communities where it operates, it is essential that each of us observe and abide by the policies set out in the Code.

The GATX Corporation Code of Business Conduct and Ethics (“the Code”) enables us to maintain high ethical standards by providing both clear guidance on how you should conduct business and mechanisms to assist in resolving ethical issues you may face. The principles of the Code apply to all employees, directors and officers of GATX Corporation and its subsidiaries worldwide.

If you have any questions or concerns about the Code or any activity at GATX, you should speak with your manager or other Company representative or if you prefer, you can speak confidentially by calling our hotline, the Network Hotline. Company representatives and Network Hotline contacts are listed in the Code. GATX will treat reports of violations confidentially, and no one who reports a suspected violation in good faith will be subject to retaliation for making such a report.

Please read the Code carefully. You will be asked to formally acknowledge that you have read the Code, understand it and agree to abide by it by signing and submitting your annual acknowledgement.

Please join me in maintaining our commitment to high ethical standards in the operation of our business.

Thank you.



Brian A. Kenney
Chairman, President and
Chief Executive Officer

INTRODUCTION	4
CONFLICTS OF INTEREST	5
CORPORATE OPPORTUNITIES	5
GIFTS AND ENTERTAINMENT	5
USE OF INSIDE INFORMATION	6
FAIR DEALING	6
CONFIDENTIALITY	7
PROTECTION AND USE OF COMPANY ASSETS	7
RECORDS RETENTION	7
WORK ENVIRONMENT	8
ANTITRUST AND COMPETITION	9
ANTIBRIBERY	9
POLITICAL CONTRIBUTIONS	11
USE OF INFORMATION TECHNOLOGY AND ELECTRONIC COMMUNICATION	11
PUBLIC COMMUNICATIONS	12
PRIVACY OF INFORMATION	12
DELEGATED AUTHORITIES	13
INVENTIONS, BOOKS AND PUBLICATIONS	13
REPORTING	13
RETALIATION	14
CONFIDENTIAL TREATMENT OF REPORTS	14
SCOPE	15
CONTACT INFORMATION	16
ANNUAL ACKNOWLEDGEMENT	17

Introduction

This *Code of Business Conduct and Ethics* (the “Code”) codifies the principles under which GATX Corporation and its consolidated subsidiaries (“GATX” or the “Company”) conduct business and applies to every officer, director and employee of GATX (for simplicity, hereinafter referred to as the “employees”). Where the Company invests in joint ventures, the principles set forth in the Code should be actively promoted. The principles set forth in the Code reflect the ethical values GATX seeks to uphold and are important in reinforcing legal compliance and in maintaining and strengthening the reputation of GATX as a responsible and trustworthy corporate citizen, employer and business partner.

The standards in the Code apply in all countries where GATX conducts business. The Company has adopted one Code, instead of regional codes, because it wants to embrace the same ethical values wherever it does business. All employees must comply with the laws and regulations of the country where they work, but because GATX is a U.S. company, U.S. law applies in all countries where the Company does business. Unlawful conduct under any relevant legal system will not be tolerated, even when the intent is to further legitimate corporate objectives.

This Code cannot cover every applicable law or provide answers to every question that might arise. Nevertheless, the principles set forth in this Code can and should serve as guidelines in dealings with customers, shareholders, fellow employees, business partners and all others with whom the Company has relationships. Policies adopted by the Company may also apply to various circumstances or situations, and employees should refer to these policies for further information. The Company must rely on each person's good sense of what is right, including a sense of when it is proper to seek guidance from others on the appropriate course of conduct.

A number of resources are available to an employee who needs clarification regarding the Code,

assistance in dealing with an ethical matter, or wants to report possible violations of our standards, laws or regulations. (For more information on how to use and contact these resources, please see the section entitled “Reporting” beginning on page 13 and “Contact Information” on page 16 of this Code.) The Company will investigate any matter reported and may take appropriate disciplinary and corrective action, including termination of employment. The Company forbids retaliation against employees who report violations of this Code in good faith.

The Code is a statement of goals and expectations for individual and business conduct. The contents of the Code do not create a contract of employment, and nothing contained in the Code should be considered a guarantee of continued employment.



CONFLICTS OF INTEREST

A conflict of interest is any interest, relationship or activity that is incompatible with the best interests of GATX or that has the potential to adversely affect an employee's objectivity in performing services for the Company. A conflict can arise when an employee takes actions or has interests that may make it difficult to perform his or her work objectively and effectively. Conflicts of interest may also arise when an employee, or a member of his or her family, receives improper personal benefits as a result of the employee's position in the Company.

Potential conflict situations may include, but are not limited to:

- Serving as a director, officer, employee, partner or consultant of a present or potential supplier, customer, competitor or other business partner of the Company unless the employee has made full disclosure and, where necessary, has obtained appropriate prior approval;
- Owning stock or other interests in a business described immediately above unless such business is a publicly-held and actively-traded company;
- Any other significant direct or indirect personal interest in a transaction involving the Company;
- Acceptance of any form of compensation or payment from a third party.

Many conflicts of interest can be resolved following full disclosure in a simple and mutually acceptable way. Any potential conflict of interest should be promptly disclosed by the employee to his or her manager who will work with the Law Department and others in the Company to resolve the issue. Any potential conflict should also be disclosed whenever an employee is asked to certify his or her understanding of, and adherence to, the standards set forth in this Code. Resolution of potential conflicts of interest involving executive officers or directors of the Company shall be made by the Board of Directors, acting through the Audit Committee, and is further subject to the Company's Related Person Transactions Approval Policy.

CORPORATE OPPORTUNITIES

No employee may, either directly or indirectly: (a) take personal advantage of business opportunities that are discovered or made available through his or her position with the Company or through information gained through such position, unless such opportunity has been presented to and rejected by the Company; (b) use Company property, information or position for personal gain; or (c) compete with the Company. Employees owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.

GIFTS AND ENTERTAINMENT

Employees must select and deal with current and prospective suppliers, customers and others doing, or wishing to do, business with GATX impartially and in consideration of the best interests of the Company. Modest gifts and reasonable entertainment may be received from business associates of GATX. No gift, favor or entertainment shall be of such a nature as might affect, or reasonably be perceived to affect, an employee's judgment or conduct in matters involving GATX.

Employees can accept only gifts or entertainment of modest value.

Q&A

My brother is Vice President of Marketing for a firm that is bidding on a vessel maintenance contract for ASC. Is this a matter that I should disclose?

Yes, this might be a conflict of interest depending on your position with the Company.

USE OF INSIDE INFORMATION

Employees are prohibited from buying or selling securities of GATX while in possession of material, non-public information or, for officers, directors and certain other employees, during an earnings blackout period. Information is “material” if it would have a significant impact on the market price of a company’s stock or if there is a substantial likelihood that a reasonable investor would consider it important in making a decision to buy, sell, or hold stock. Examples of material information include, among other things, facts concerning corporate earnings, material contracts, acquisitions or other significant transactions, changes in management and other important business developments. This prohibition also applies to trading in the securities of other companies about which an employee learns of material, non-public information through his or her employment with GATX and to trading by family members and family trusts or other entities controlled by an employee or his or her family. Employees are also prohibited from communicating or “tipping” third parties regarding material, non-public information.

Information is “material” if there is a substantial likelihood that a reasonable investor would consider it important in making a decision to buy, sell, or hold a security or where the information might have an effect on the market price of the security.

FAIR DEALING

Each employee shall endeavor to deal fairly and in good faith with GATX customers, suppliers, business partners and competitors. No employee shall take unfair advantage of anyone through manipulation, abuse of privileged or confidential information, misrepresentation, fraudulent behavior or any other unethical business practice.

It is sound business practice for the Company to obtain information about markets in which the Company does business, including information about the Company’s competitors, their products and services. However, employees may accept competitive information only when there is a reasonable belief that both the receipt and use of the information is lawful. Employees must never attempt to acquire a competitor’s trade secrets or other proprietary information through unlawful or unethical means.

CONFIDENTIALITY

GATX regards confidential or proprietary information as an important asset, and prohibits the unauthorized use or disclosure of such information by employees. Employees should maintain the confidentiality of business information entrusted to them by the Company, its business partners, suppliers, customers or other parties. Such information must not be disclosed to others, except when disclosure is authorized by GATX or legally mandated. Confidential information includes all non-public information that might be of use to competitors or investors or harmful to GATX, or its customers, if disclosed.

PROTECTION AND USE OF COMPANY ASSETS

Employees have a responsibility to protect the Company's assets from loss, theft or misuse. GATX seeks to preserve, protect and responsibly use all of its assets to remain competitive and to serve the interest of the Company's shareholders. This includes tangible as well as intangible assets such as trade secrets, business information and intellectual property. All Company assets should be used only for legitimate business purposes.



RECORDS RETENTION

GATX has records retention and disposal procedures to ensure that Company records are retained in accordance with the Company's needs and in compliance with applicable legal and regulatory requirements. These records include paper and electronic copies of documents. Each employee is expected to know the specific requirements applicable to his or her area of responsibility. Subject to local requirements and laws, employees may retain documents consistent with daily business needs. Historical documents or artifacts must be identified and stored in a reasonable manner intended to protect such documents from damage. An employee should contact the Director of Investor Relations with any questions on historical archiving.

The destruction, shredding, deleting or other alteration of documents or records in order to impede a governmental investigation, lawsuit, audit or examination can result in criminal liability. If an employee is not sure whether a document can be destroyed, he or she must consult a member of the Law Department before doing so.

WORK ENVIRONMENT

Equal Employment Opportunity

GATX's policies are intended to create an environment in which each employee may reach his or her highest potential. Consistent with its obligations under applicable laws and regulations, the Company's policies prohibit all form of unlawful discrimination against any employee or applicant for employment. The Company is committed to providing equal opportunity to all qualified individuals in its hiring and promotion policies. Employees of the Company are expected to adhere to all applicable laws, regulations and Company policies relating to equal opportunity and nondiscrimination.

Harassment Free Workplace

GATX wants to ensure a work environment free of harassing conduct or behavior. It is the policy of GATX that harassment is unacceptable conduct in the workplace and will not be tolerated. Harassment occurs from conduct directed at an employee that involves discriminatory treatment based on classifications including race, sex (with or without sexual conduct), gender identity, religion, national origin, ancestry, age, physical or mental disability, medical condition, sexual orientation,

marital status, veteran status, or other legally protected classification under local law. Employees of GATX should treat one another with courtesy, dignity and respect. All employees should recognize that there continues to be rapid social change as to appropriate conduct in the workplace, and workplace behavior should always reflect the high ethical principles set forth in this Code.

Workplace Violence

Employees should have a safe workplace. Workplace violence, including threats, threatening behavior, harassment, intimidation, assaults and similar conduct, will not be tolerated. Any threats or concerns about an employee's safety or the safety of others should be immediately reported to your manager.

Health, Safety and the Environment

Protection of health, safety and the environment is a primary goal of GATX. The Company is dedicated to continuous efforts to make its operations compatible with protecting people, property, and the environment. The Company is committed to working with its employees, customers, suppliers and business partners and with the communities in which it operates to achieve this goal. All GATX employees are expected to fulfill their duties and responsibilities in compliance with the law,

Company policies and industry standards applicable to health and safety in the workplace and protection of the environment.

Q&A

Employee: Can I place a pinup calendar at my work space?

Manager: No, employees at GATX are expected to treat one another with courtesy, dignity and respect. This type of calendar is offensive and does not belong in the workplace.

Employees must follow all Company safety rules and operating procedures to protect their safety and the safety of others.

ANTITRUST AND COMPETITION

Never engage in the following activities with competitors:

Set prices or create price ceilings or floors

Rig bids

Refuse to deal with third parties

Allocate customers or territories

Set quotas or limits on sales to or purchases from third parties

Payments to public officials may be made only with the specific written approval of the Law Department.

Most countries have competition laws known as antitrust, cartel and fair trade laws that are intended to maintain fair and competitive markets. These laws prohibit agreements among competitors on matters which may tend to undermine competition such as prices, terms of sale to customers, allocating markets or customers and boycotting suppliers and customers. These laws also regulate the behavior of dominant companies, and require prior review for mergers, acquisitions, and certain other transactions.

Many of these laws apply to conduct that occurs outside of a country's borders. GATX aggressively competes but will only do business according to the letter and spirit of all laws that govern and promote free and fair competition. The Company must strictly comply with the antitrust laws of the United States and, where applicable, the antitrust or related laws of any other country.

A violation of the antitrust laws is a serious offense. In the U.S., it is not uncommon for individuals to be criminally prosecuted. Prohibited activities include, for example, agreements with competitors to fix prices, boycotts of customers or third parties, or other agreements to restrain or restrict competition.

The antitrust laws are complicated and cannot be completely covered here. Any employee of the Company who has responsibility for business conduct that might be subject to antitrust laws must be guided by the Company's Antitrust Policy and the advice of the Law Department. Any questions about activities with antitrust implications must be referred to the Law Department before taking any action.

ANTIBRIBERY

Most countries in which the Company does business have adopted, or are in the process of adopting, laws and regulations that prohibit giving anything of value directly or indirectly to officials of foreign governments in order to obtain or retain business. GATX as a U.S. company must comply with all applicable local laws and the U.S. Foreign Corrupt Practices Act (FCPA) which prohibits such bribery wherever it does business.

The FCPA prohibits GATX, its subsidiaries, employees or representatives from making or offering to make a payment, promise or other benefit, directly or indirectly, to any government official outside the U.S. for the purpose of improperly causing the foreign official to act or cause an act for the benefit of the Company or a subsidiary. The term "government official" is defined broadly to include

officials or employees of any government or other public body, agency or legal entity, at any level, including officers or employees of state-owned enterprises and public international organizations. It also includes candidates for political office, political party officials and employees, as well as political parties. Further, GATX employees may not give money or anything of value to another party (for example, to a consultant, agent, intermediary, business partner or other third party) if any portion of the money or benefit may possibly be directly or indirectly passed on to a government official to influence official action or obtain an improper advantage. For that reason, employees responsible for hiring consultants, agents, partners in joint ventures or comparable entities must (a) ensure that those third parties understand and will comply with the Company's anticorruption policies and applicable law, (b) evaluate the qualifications and reputation of such third parties and (c) require written agreements and contracts approved by GATX's Law Department with appropriate provisions designed to protect the Company

Marketing consultants and sales agents can be retained only with written agreements approved by the Law Department.

The FCPA also requires the Company to maintain a system of internal accounting and books and records that accurately reflect each transaction. The purpose of these provisions is to prevent fraudulent accounting practices which help conceal bribes.

U.S. law and the laws of certain of its major trading partners have also criminalized commercial bribery. Employees are prohibited from making a bribe, directly or indirectly, to a private person with the intention that a function or activity will be performed improperly. Employees are also prohibited from accepting a bribe. Employees should avoid making or benefiting from excessive expenditures for entertainment with current or prospective private sector customers or suppliers that could be considered an attempt to induce improper performance.

In some cases, the laws of other countries are more restrictive than the U.S. law. Payments of minor amounts designed to expedite or secure the performance of routine government actions, known as "facilitating payments," are legal under a limited number of circumstances under U.S. law, but are often illegal under the laws of the country in which the payments would be made. The Company believes that every effort should be made to resist or minimize such payments. To

ensure that all payments comply with U.S. law and local law, facilitating payments to public officials may be made only with the specific written approval of the Law Department.

Violations of antibribery laws could result in criminal and civil liability for the Company, and for individual officers, directors, employees, and agents. The Company could also face fines and collateral consequences such as debarment from government business. Individuals risk imprisonment and the imposition of fines, which cannot be paid by the Company.

The Company expects employees to comply with the Company's Antibribery Policy and all applicable antibribery laws. Additionally, employees must not engage in any acts of bribery of domestic officials or private parties not otherwise regulated by the FCPA or similar local laws. In this regard, employees may not give or accept bribes and must immediately report any offer of a bribe.

Employees may not give or accept bribes and must immediately report any offer of a bribe.

POLITICAL CONTRIBUTIONS

Q&A

I have been elected to the town council. Can my administrative assistant prepare my council presentation materials?

No. You may not use Company resources to support your personal participation in the political process.

Most countries have laws governing GATX's actions in contributing, directly or indirectly, to any candidate for public office, political parties, or other political organizations. Employees are free to contribute to candidates or otherwise participate in the political process in their individual capacities. The Company encourages its employees to take part in the political process. However, employees may not be given time off with pay for political activity and may not use Company resources, funds or assets for contributions of any kind to an elected official, political party or candidate for elected public office. Political contributions may not be made, or have the appearance of being made with the Company's funds.

USE OF INFORMATION TECHNOLOGY AND ELECTRONIC COMMUNICATION

The computer, network, internet access and data (the "Systems") made available by the Company are provided to employees and other authorized users primarily for business use. Use of these resources for purposes other than the execution of GATX business, must be governed by good judgment and restraint. Users are responsible for the

professional, ethical and lawful use of the Systems.

The Company's Systems may not be used to access, disseminate, or store destructive software code, sexually explicit content, slanderous or libelous content, threatening or harassing messages, chain letters, content that could be considered as hostile or in poor taste or any other unauthorized materials. Occasional, limited appropriate personal use of the Systems is permitted if such use does not (a) interfere with the user's or any other employee's job performance, (b) negatively affect the Systems' performance or (c) violate any other policy of the Company. GATX Systems must never be used to perform commercial activities for a business owned by an employee and/or a third party.

Use of these Systems, whether in the office or at home, is not private. To the extent permitted by applicable law, all documents, including electronic communications, are the Company's property. GATX reserves the right, as permitted by local law, to access and review, (which may include monitoring, searching, inspecting, intercepting, filtering, copying, blocking and disclosing) any information contained in the Systems, for legitimate purposes, such as monitoring System performance and assuring compliance with GATX's policies and procedures. By accepting the

terms in this Code, an employee expressly consents, to the extent permitted by applicable law, to such access and review. Those who use the Company's Systems to access web sites containing sexually explicit material or other inappropriate content, or use the Systems in violation of this Code or applicable law, may be subject to discipline, including dismissal where permitted by applicable law. Employees who question whether accessing a particular web site is prohibited or their use of the Systems is appropriate should check with their manager.

PUBLIC COMMUNICATIONS

GATX is committed, consistent with legal and regulatory requirements, to delivering accurate and reliable information to the media, financial analysts, investors, brokers, and other members of the public. All public disclosures, including forecasts, press releases, speeches and other communications, will be honest, accurate, timely and representative of the facts. To ensure consistent, accurate delivery of Company information, employees, other than the Chief Executive Officer, Chief Financial Officer and Director of Investor Relations, are not authorized to answer questions from the news media, research organizations securities analysts, investors or other members of the public,

other than consistent with the requirements of the employee's job responsibilities. When approached for information, an employee must immediately notify the Director of Investor Relations. Any presentation made by any employee of GATX that contains Company financial information must be approved in advance by the Director of Investor Relations.

PRIVACY OF INFORMATION

The Company is committed to complying with the laws that govern the collection, use and management of personal information of current and former employees, directors, suppliers and customers in the countries where it does business. Laws in many countries govern how employees must handle personal information and health related information. Employees must collect, use, maintain, share and transfer personal information in compliance with Company policies and applicable law. Personal information in electronic or paper form must be kept confidential and held securely and disclosed only to others who have a legitimate business reason to access the personal information. Transfers of personal information between countries must comply with applicable legal requirements. Employees should report any concern that personal information might not be

properly protected or that protection of personal information has been compromised.

To ensure consistent, accurate delivery of Company information, when asked for information for public disclosure, immediately notify the Director of Investor Relations

Personal information in any form must be kept confidential and held securely and disclosed only to others who have a legally permitted and legitimate business reason to access the personal information.

DELEGATED AUTHORITIES

The Company's by-laws authorize its officers to make commitments on its behalf. The Company has also adopted detailed guidelines that specify which officers and employees are authorized to approve a commitment by the Company to specific undertakings. These guidelines, known as the Delegated Authorities, should be checked before making a commitment on behalf of GATX.

INVENTIONS, BOOKS AND PUBLICATIONS

Employees must receive written permission from senior management before developing, outside the Company, any products, software or intellectual property that is or may be related to the Company's current or potential business.

REPORTING

Duty to Report and Consequences

Every employee has a duty to adhere to the Code, and to report to the Company any suspected violations. Failure to comply with the Code can have severe consequences for both the Company and the people involved. Accordingly, GATX will impose discipline for violations of the Code, including termination of employment in appropriate

cases. In particular cases, the Company may refer individual misconduct to appropriate governmental authorities and seek payment for any monetary loss caused by the responsible individual.

GATX strongly encourages employees to voluntarily report their own violations of this Code. A voluntary report demonstrates the integrity and good character the Company values in its employees. If an employee is involved in a violation, the employee's reporting of it, and his or her cooperation, will be favorably considered by the Company in any resulting disciplinary action. An unintentional violation of the Code made in good faith that is voluntarily and promptly reported is unlikely to be punished, and an employee's prompt reporting of the same may avoid even more serious consequences.

Reports to Management

An employee's manager will usually be the employee's first contact for clarification of the Code, assistance in dealing with a specific ethical matter or reporting possible violations of GATX standards, laws or regulations, consistent with obligations that apply to that employee under local law. If the employee is unable or uncomfortable going to his or her manager, the employee should contact the next level of management within the management chain. If the

If you need clarification regarding the Code, assistance in dealing with an ethical matter, or want to report possible violations of our standards, laws or regulations, contact your manager or the resources identified in the section entitled "Contact Information" on page 16.

Retaliation against any employee who makes a good faith report of alleged wrongdoing is prohibited. Individuals who retaliate will be disciplined.

The Hotline can be accessed by dialing the 1-888 749 1947. Outside of North America you must also dial the country code identified on page 16.

employee is not comfortable contacting any of these managers, or the employee believes none of the individuals to whom he or she has reported a potential violation have taken appropriate action, the employee is encouraged to contact other resources listed on page 16 in the section entitled “Contact Information,” including the Law and Internal Audit Departments.

Reports using the Hotline

The employee also may report by using the Company’s Network Hotline (the “Hotline”). The Hotline is operated by specially-trained third-party representatives. Local laws affect the Hotline’s terms of use. In some countries, the Hotline can only be used to report serious financial and accounting fraud or concerns about senior management. Some countries permit anonymous reporting while others prohibit it. Hotline representatives will listen to an employee’s concerns, ask questions, and review the information provided. The Hotline representatives will explain any reporting limitations imposed by local laws and regulations and will forward the employee’s matter to the appropriate person, who will take appropriate action. The employee can arrange to receive information about the Company’s response to the call.

Reports to the Audit Committee

An employee may also choose to report a possible violation or express a compliance concern directly to the Audit Committee of the Board of Directors. To do so, please send the information to: Chairman, Audit Committee of the Board of Directors, c/o Corporate Secretary, GATX Corporation, 222 West Adams Street, Chicago, Illinois 60606; or by sending an e-mail to contactboard@gatx.com.

RETALIATION

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 to one of the Law or Internal Audit contacts or the Network Hotline. Individuals who retaliate will be disciplined, which could include termination of employment.

CONFIDENTIAL TREATMENT OF REPORTS

To encourage employees to come forward, reports of potential violations, including the identification of the reporting person, will be treated confidentially by the Company to the extent practical and permitted by the Company’s legal obligations.

SCOPE

This Code does not supersede, change or alter existing Company policies and procedures. As noted above, certain principles referred to in the Code are the subject of formal policies which have been adopted by the Company. In addition, the Company has a separate Code of Ethics applicable to its senior officers, which may contain standards of conduct applicable to those officers that may be stricter than those in this Code.

Only the Board of Directors, or a Board committee to which such responsibility has been delegated, may waive any applicable provision of this Code for a senior officer or director of the Company. Any such waiver shall be promptly disclosed to shareholders.

CONTACT INFORMATION

North America

Chief Compliance Officer (Internal Audit)	
Stephen Young	(312) 621-6481
General Counsel (Law)	
Deborah Golden	(312) 621-6240
Chief Commercial Officer - Rail	
Thomas Ellman	(312) 621-4560
Human Resources	
Katie Lawler	(312) 621-6220
The Network Hotline	
Toll free number	(888) 749-1947

Europe

President, GATX Rail International	
James Earl	(312) 621-4571
President-Rail Europe	
Johannes Mansbart	+(43) 1 86-56-686-17
Chief Operating Officer	
Johann Feindert	+(43) 1 86-56-686-13
Legal-Poland	
Agnieszka Lewocka	+(48) 22 697-92-21

Asia

President, GATX Rail International	
James Earl	(312) 621-4571
Country Head	
Saurabh Sood	91.124-4422999

The Network Hotline

Call the country access code and then the toll free number:

Austria	access code	+800.200.288	toll free number	1.888.749.1947
Germany	access code	+0.800.2255.288	toll free number	1.888.749.1947
India	access code	000-117	toll free number	1.888.749.1947
Poland	access code	+0.0.800.111.1111	toll free number	1.888.749.1947
Mexico	access code	01.800.288.2872 <u>or</u> 001.800.462.4240	toll free number	1.888.749.1947

GATX Code of Business Conduct and Ethics
ANNUAL ACKNOWLEDGEMENT

You are required to certify that you have read the GATX Code of Business Conduct and Ethics (the "Code") and that you will comply with it.

I have read and understand the Code, and I will comply with all statements included in the Code. I will report violations and suspected violations, including any unethical, illegal or unsafe behavior to my manager or another available manager, the compliance department, the law department, or any of the contacts listed in the Code. Consistent with obligations applicable to me under local law, I can also make a report by contacting The Network through their website (www.reportlineweb.com/GATX) or by calling toll-free (888-749-1947).

Print Name _____

Signature _____

Date _____