



CODE OF ETHICS

for CEO, CFO and OTHER SENIOR FINANCIAL EXECUTIVES

AAM's senior leaders serve an important function in corporate governance. They are vested with the responsibility and authority to protect the interests of AAM's stockholders and associates by enforcing the policies and procedures of AAM's financial organization. AAM's Chief Executive Officer, Chief Financial Officer and AAM associates designated by AAM's Chief Financial Officer shall exercise this responsibility and authority by adhering to the following principles and requirements:

1. Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
2. Avoidance of conflicts of interest, including disclosure of any material transaction or relationship that reasonably could be expected to give rise to such a conflict in accordance with AAM's Conflict of Interest Policy;
3. Maintain complete, accurate and timely records and accounts to reflect all business transactions;
4. Provide information, including forecasts and assessments to management, which is accurate, complete, objective, relevant, timely, candid and understandable;
5. Act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing independent judgment to be subordinated;
6. Respect the confidentiality of information acquired in the course of job duties except when authorized or otherwise legally obligated to disclose. Confidential information acquired in the course of work is not to be, and will not be, used for personal advantage;
7. Share knowledge with appropriate AAM associates and maintain skills important and relevant to job position and duties;
8. Proactively promote ethical behavior among peers in the work environment and community;
9. Safeguard and responsibly use and control all physical, financial, informational and other company assets and resources employed or entrusted to the associate;
10. Comply with AAM's accounting policies and practices, generally accepted accounting principles, governmental laws, rules and regulations designed to produce full, fair, accurate, timely, and understandable disclosure in the periodic reports and other documents AAM files with, or submits to, the SEC and in other public communications made by AAM; and
11. Promptly report any actual or suspected violations of this Code to the Chief Compliance Officer or by using any of the reporting methods described in AAM's Code of Business Conduct, including the Business Ethics Line.