



Martinrea International Inc.



HUMAN RIGHTS POLICY

Contents

1. Policy..... 3

1.1. Introduction 3

1.2. Applicability..... 3

1.3. Forced Labour 3

1.4. Child Labour..... 3

1.5. Compensation..... 3

1.6. Work Hours..... 3

1.7. Harassment and Discrimination and Diversity..... 4

1.8. Health and Safety 4

1.9. Freedom of Association and Collective Bargaining..... 4

1.10. Community Engagement and Indigenous Populations..... 4

1.11. Responsibility and Implementation 4

1.12. Duty to Accommodate 5

2. Contact information 5

1. Policy

1.1. Introduction

This Human Rights Policy (the “Policy”) describes Martinrea’s commitment to providing a workplace that is free from unlawful discrimination and harassment. All employees are entitled to a working environment where they are treated with respect and dignity and have equal opportunity to fully contribute.

The Policy sets out Martinrea’s guiding principles around, and our corporate commitment to, the protection of human rights, outlines prohibited behaviour and sets out the procedures to be followed when incidents arise.

Respect for the human rights of our employees and other stakeholders is important to our business. We intend to comply with all human rights laws and regulations that apply to us. We provide fair working conditions for our employees and do not tolerate the use of child labour or forced labour in our supply chain. We also expect any supplier or other company that we work with to act ethically and comply with the law. All employees have the right to a workplace free from discrimination and harassment based upon characteristics protected under human rights legislation, including race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, record of offences, marital status, family status and disability.

1.2. Applicability

This policy applies to Martinrea International Inc., its operating divisions, subsidiaries and sponsored joint ventures (collectively, “Martinrea” or the “Company”). This policy extends to all Directors, Officers, employees, agents and consultants of Martinrea. Additional legal requirements may apply in different jurisdictions.

Respect for the human rights of our employees and other stakeholders is important to our business. We intend to comply with all human rights laws and regulations that apply to us. We provide fair working conditions for our employees and do not tolerate the use of child labour or forced labour in our supply chain. We also expect any supplier or other company that we work with to act ethically and comply with the law. All employees have the right to a workplace free from discrimination and harassment based upon characteristics protected under human rights legislation, including race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, record of offences, marital status, family status and disability.

1.3. Forced Labour

The Company will not use forced labour in any form, and will not tolerate physically abusive disciplinary practices. Martinrea strictly rejects all forms of forced/compulsory labour, modern slavery, involuntary or exploitative prison labour, human trafficking, and other forms of exploitation. In particular, serious forms of human trafficking that involve the recruitment, transport, movement, accommodation, or reception of persons through the use of violence, coercion, abduction, deception, subterfuge, abuse of power or weakness, or the granting of payments or benefits to a person who has control over the victim are strictly prohibited.

1.4. Child Labour

The Company will not use child labour. In no event will the Company employ any person below the age of 15, or as otherwise required by local law, unless this is part of a government-authorized job training or apprenticeship program that would be clearly beneficial to the persons participating.

1.5. Compensation

The Company will promote our employees’ material well-being by providing compensation and benefits that are competitive and comply with applicable law.

1.6. Work Hours

The Company will comply with applicable laws regulating hours of work.

1.7. Harassment and Discrimination and Diversity

In addition to our Workplace Violence and Harassment Policy or applicable local policy, the Company aims to protect minority group rights' and women's rights, and will not tolerate harassment or discrimination on the basis of gender, race, colour, creed, religion, age, national origin, sexual orientation, gender identity, disability, or veteran status (if applicable). Furthermore, the Company is committed to promoting and encouraging diversity throughout the Company, including in its senior management and Board of Directors. The Company has a Diversity, Equity and Inclusion Policy adopted for the purpose of promoting diversity within the Company.

1.8. Health and Safety

As more fully provided in our Employee Handbook or applicable local policy, the Company will provide and maintain for all employees a safe and healthy work environment that meets or exceeds applicable standards for occupational health and safety.

1.9. Freedom of Association and Collective Bargaining

The Company recognizes and respects its employees' right to associate freely and bargain collectively. The Company will work constructively with recognized employee representatives, where applicable, to promote the interests of its employees. In locations where employees are not represented by unions, the Company will provide opportunities for employee concerns to be heard.

1.10. Community Engagement and Indigenous Populations

Local communities and indigenous people are important, and the Company will work constructively with recognized representatives of these groups who have an interest in the Company's projects and activities.

The Policy establishes Martinrea's guiding principles for labour and environmental standards, which are modified accordingly for local legal requirements, labour agreements and other contractual and non-contractual arrangements. The principles are consistent, as of the date of this Policy, with the following human rights frameworks and charters:

- The United Nations Universal Declaration of Human Rights
- The United Nations Global Compact
- The Organization for Economic Co-operation and Development
- The Global Sullivan Principles of Social Responsibility
- International Labour Organisation (ILO) Declaration of Fundamental Principles and Rights at Work

The diverse settings in which Martinrea operates require that a statement of our basic working conditions be general in nature. In certain situations, local legal requirements, labour agreements, and other contractual and non-contractual arrangements may modify portions of this Policy. Martinrea intends this to be an affirmation of basic guiding principles that should serve as the cornerstone of its relationship with employees.

1.11. Responsibility and Implementation

Martinrea expects all of our suppliers to adhere to these basic working conditions and to continue or build relationships with organizations that conduct their business consistent with these principles.

The Company will, where it determines appropriate, seek the assistance of independent third parties to assess compliance with this Policy.

This Policy is not intended to create or confer any third party rights.

All Company personnel must report known or suspected violations of this Policy through the established reporting channels, as more particularly set out in the Whistleblower Policy. The Company prohibits retaliation against anyone who in good faith reports a violation.

1.12. *Duty to Accommodate*

To ensure that persons who are otherwise able to work are not unfairly excluded from doing so based upon protected characteristics, Martinrea is committed to making every reasonable effort to accommodate the needs of employees related to the protected grounds of discrimination, short of causing undue hardship.

Accommodation requests should be directed to your immediate supervisor, manager or the Human Resources department in a timely manner. Martinrea is committed to responding to accommodation requests in a timely, confidential and sensitive manner.

Employment accommodation is assessed and provided on an individualized basis. Employees are expected to cooperate in the search for and implementation of reasonable accommodation.

2. *Contact information*

For further information, please contact the General Counsel and Corporate Secretary at 416-749-0314.

Martinrea International Inc.

3210 Langstaff Rd.
Vaughan, ON L4K 5B2 |
416.749.0314

Connect with Martinrea on Social!

