



MARTINREA INTERNATIONAL INC.

Responsible Function: MARTINREA LEGAL DEPARTMENT

Policy Name: SUSTAINABILITY POLICY

Policy No.: LP-4-V3-2020

Revision Number: 3

Last Revised: March 13, 2020

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Policy Scope: ALL LOCATIONS

ISSUED AND APPROVED BY:
CHIEF EXECUTIVE OFFICER and
EXECUTIVE CHAIRMAN

POLICY SUMMARY

1. **WHAT IS THIS POLICY?**

This Sustainability Policy (the “Policy”) supports and promotes the Company’s continued commitment to conducting its business in a way that aligns with internationally accepted principles for working conditions and corporate responsibility, including those established by the United Nations and the Organization for Economic Co-operation and Development.

2. **WHY IS THIS POLICY IMPORTANT?**

This 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. This Policy addresses important matters such as child and forced labour, compensation and work hours, freedom of association and collective bargaining, harassment and discrimination, health and safety, community engagement, bribery and corruption, and the environment and sustainability.

3. **WHAT YOU SHOULD DO?**

Follow all applicable rules and regulations of governments and respect all customs and business practices in the countries in which Martinrea operates. Report known or suspected violations of the Policy using the contact information provided at the end of this policy.

If you have any questions or are concerned that you or the Company may be negatively affected by any behavior that is contrary to the Policy, please contact the Legal Department using the contact information provided on the last page of this policy.

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1. **SCOPE**

- 1.1. This policy applies to all within Martinrea International Inc., its operating divisions, subsidiaries and sponsored joint ventures (collectively, “Martinrea” or the “Company”). This policy extends to Directors, Officers and Employees of Martinrea.

2. **PURPOSE**

- 2.1. The Company has developed and adopted this Sustainability Policy (the “Policy”) applicable to its Directors, Officers and Employees throughout Martinrea’s global operations for the purpose of supporting and promoting the Company’s continued commitment to conducting its business in a way that aligns with internationally accepted principles for working conditions and corporate responsibility. This policy supplements, and some of the principles may overlap with, the Company’s existing policies including the Company’s Policy *Anti-Bribery and Corruption of Foreign Public Officials (the “ABC Policy”)*, which shall continue to apply. This Policy also applies to all third parties that does business with the Company.

3. **POLICY**

3.1. **Child Labour**

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

3.2. **Compensation**

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

3.3. **Forced Labour**

The Company will not use forced labour in any form, and will not tolerate physically abusive disciplinary practices.

3.4. **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.

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3.5. **Work Hours**

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

3.6. **Harassment and Discrimination and Diversity**

In addition to our Workplace Violence and Harassment Policy or applicable local policy, the Company 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. 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 policy adopted for the purpose of promoting diversity within the Company.

3.7. **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.

3.8. **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.

3.9. **Bribery and Corruption**

In addition to the ABC Policy, employees must comply with all applicable rules and regulations of federal, provincial, state and local governments and respect the customs and business practices in the countries in which Martinrea operates. In addition to the requirements of the ABC Policy, employees are strictly prohibited from accepting or offering illegal payments, bribes, kickbacks or any other thing of value to secure a contract to our advantage or influence business decisions in the Company's favour.

3.10. **Environment and Sustainability**

As more fully stated in our Employee Handbook, or applicable local policy, the Company will conduct business in a manner that provides responsibly for the protection of health and the environment. The Company will as practicable continue to reduce and minimize the environmental impact of its operations in the short term, and work toward the implementation of environmentally-sustainable strategies in the long term. Specifically, the Company will strive to:

- improve the efficient use of natural resources, including energy;
- minimize waste streams and emissions;

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- implement effective recycling programs in its manufacturing operations, through the use of locally set continuous improvement targets; and
- utilize innovative design and engineering to reduce the environmental impact of its products during vehicle operation and at end of life.

4. **INTERNATIONAL STANDARDS**

4.1. 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

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.

5. **RESPONSIBILITY AND IMPLEMENTATION**

5.1. 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.

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

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

5.4. All Company personnel must report known or suspected violations of this Policy through the established reporting channels, noted below. The Company prohibits retaliation against anyone who in good faith reports a violation.

5.5. The Chief Executive Officer, the Executive Chairman and the General Counsel and Corporate Secretary are responsible for interpreting this Policy with the concurrence, as appropriate, of the Executive Vice President, Human Resources, and Executive Vice President, Procurement and Supply Chain Operations.

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5.6. All Martinrea subsidiaries and affiliates must adopt a similar directive.

Thank you in advance for your understanding and co-operation. If at any time you have any questions or concerns regarding this Policy, please contact me or General Counsel and Corporate Secretary so we can personally address your questions or concerns.

Sincerely,

Pat D'Eramo
President & Chief Executive Officer

Robert P. Wildeboer
Executive Chairman

Contact Information

**Executive Vice President, Procurement
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