



Martinrea International Inc.



SUSTAINABILITY POLICY

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1. Guidelines

1.1. Introduction

This Sustainability Policy (the “Policy”) establishes Martinrea’s guiding principles around sustainability including governance policies, social policies and environmental policies. This Policy addresses important social policies 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 governance.

The Board of Directors is committed to fostering a healthy governance culture at the Company. The Board of Directors oversees the Company’s sustainability strategy and has implemented various policies designed to promote good corporate governance and sustainability practices to ensure commitment across its global operations. The Company’s sustainability strategy is led by the President and CEO working with a Sustainability Steering Committee comprised of senior executives overseeing key functions responsible for environmental (including climate), social and governance related sustainability matters, and who are responsible for developing and implementing the Company’s sustainability strategy throughout the organization, including the day-to-day management of the strategy, training and stakeholder engagement.

1.2. Applicability

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. This Policy also applies to all third parties that do business with the Company.

1.3. 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.

1.4. Compensation

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

1.5. *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.

1.6. *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.

1.7. *Work Hours*

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

1.8. *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. 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.

1.9. *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.

1.10. *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.

1.11. *Bribery and Corruption*

In addition to the Anti-Bribery and Corruption of Public Officials Policy (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.

1.12. *Environmental Sustainability*

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 and water;
- utilize an internationally accredited Environmental Management System, such as ISO14001, to ensure continuous improvement;
- responsibly source materials;
- minimize waste streams and emissions through sustainable resource management and by implementing of greenhouse gas (GHG) emission reduction targets;
- 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.

1.13. *International Standards*

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 on 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.

1.14. *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.

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.

All Martinrea subsidiaries and affiliates must adopt a similar directive.

The Company provides training on the principles in this Policy.

2. *Contact Information*

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

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