



Ethics Policy

Setting the standard for doing what's right

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A Message from Jerome Dorlack, President and Chief Executive Officer



Dear Colleagues,

When I reflect on Adient’s Guiding Principles -- the touchpoints that help us focus on what is most important to our success -- one stands a bit above the rest. “We respect and empower our people, always acting with integrity.” If we commit to doing this every day, the others will fall into place – we’ll deliver our best to customers, suppliers and the communities in which we operate.



Since our founding, we have earned a strong reputation that is built on trust and reflected in our commitment to the highest standards of ethical conduct. The standards we set for ourselves are not only the right thing to do, but also create a competitive differentiator in the market.

As we conduct our business, it is important that each of us has a framework of professional standards, policies and behaviors to guide our day-to-day decision-making. Adient’s Ethics Policy provides this ethical framework for our business.

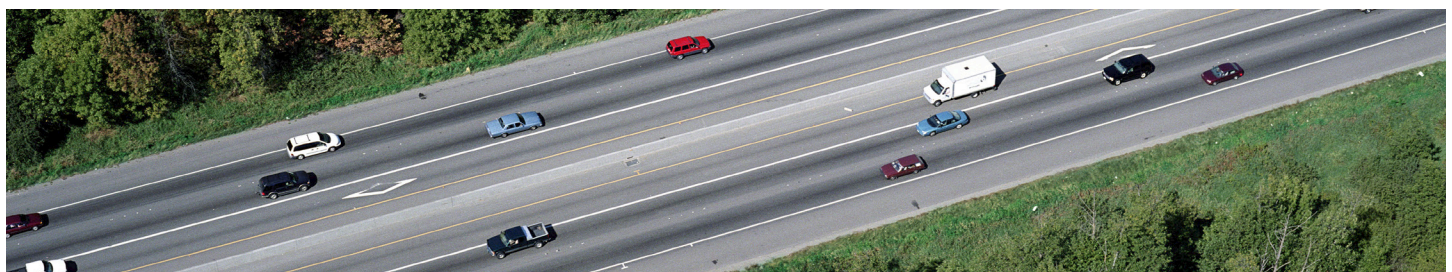
Following our Guiding Principles and committing ourselves to conducting business ethically will not only strengthen our reputation but is vital to ensuring our future success.

Thank you for upholding our commitment to integrity.

Sincerely,

A handwritten signature in black ink, appearing to be 'JD'.

Jerome Dorlack,
President and Chief Executive Officer



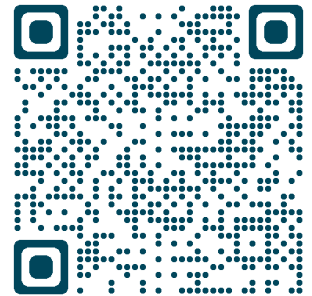
Reporting Concerns, Asking Questions

We are all responsible for protecting our culture of integrity. A potential violation is a serious matter. If you see something or are unsure if something potentially violates the Ethics Policy, speak up. We expect everyone to let us know about any suspected violation of our Ethics Policy. We do not tolerate retaliation against anyone for raising good-faith concerns.

How do I make a report or raise a concern about potential violations of the Ethics Policy?

If you have a question about the Ethics Policy or you are concerned about a potential violation of the Ethics Policy, you have a number of options:

1. Discuss the issue with your supervisor;
2. Discuss the issue with another supervisor or manager;
3. Contact the Human Resources or Legal Departments;
4. Contact the Adient 24-hour Integrity Helpline:
 - > **File a Report Online:** <https://adient.ethicspoint.com>
 - > **File a Report by Phone:** go to <https://adient.ethicspoint.com> for a free-phone number for your area. You may contact the Helpline to report concerns or ask questions confidentially, in your chosen language.
 - > **File a Report from your Mobile Device:** go to <https://adient.mobile.ethicspoint.com> or scan the QR code above



No Retaliation Policy

Adient does not tolerate retaliation for asking questions or raising good-faith concerns about possible violations of the Ethics Policy.

Violations of the Ethics Policy

Your concerns are taken very seriously. We will investigate reports of possible violations of the Ethics Policy. All employees are expected to fully cooperate with investigations conducted by the Company. Violations of the Ethics Policy are subject to disciplinary action up to and including termination.

Investigation Process

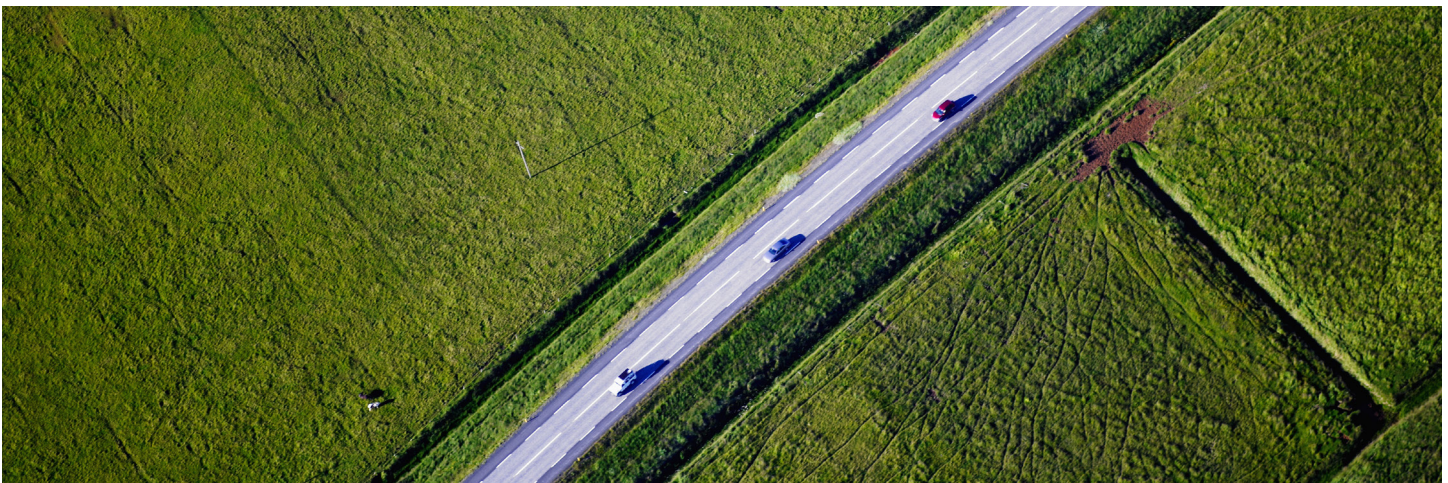
All good-faith reports are promptly and thoroughly investigated. While the investigative process may vary slightly depending on the nature of the complaint, the investigation typically involves gathering additional information from the reporter, interviews with relevant witnesses, review of relevant documentation, review of relevant policies and procedures, and other steps needed to conduct a thorough investigation.

For more information and guidance on these topics, please go to the FAQs on the Compliance and Ethics portal page on Adient Connect.

Adient's Guiding Principles:

Driving Forward with Focus

- > We deliver win-win solutions to our **customers**.
- > We approach our work with a **quality** mindset, driving operational excellence.
- > We respect and empower our **people**, always acting with integrity.
- > We support the **communities** in which we work, including being environmentally conscious globally.
- > We proactively manage costs, profitability and cash generation through our **financial discipline**.



Guiding Principle:

Our Ethics Policy applies equally to all



Applying the principle.

The Ethics Policy applies to everyone at Adient – including the Board of Directors, Company officers, employees, agents and contract workers. Adient’s suppliers must also adhere to the core principles in Adient’s Ethics Policy.

Remember:

- > Raise a concern if you believe there has been a violation of the Ethics Policy or of any law or regulation under which we operate.
- > Do not tolerate threats or retaliation. Adient does not tolerate threats, intimidation or retaliation against anyone who in good-faith raises a concern or reports a possible Ethics Policy violation.
- > Communicate to contractors, agents and other business partners that they are expected to uphold the standards of the Adient Ethics Policy when working with or on behalf of Adient.
- > We expect our suppliers to adhere to the principles in the Adient Ethics Policy and to comply with Adient’s Global Supplier Standards Manual at <https://www.adient.com/suppliers/supplier-expectations/>.

Ensuring compliance and accountability.

- > Employees are expected to follow the Ethics Policy and assist their co-workers and Adient suppliers and business partners in understanding and complying with the Ethics Policy.
- > Supervisors are expected to make employees aware of the Ethics Policy’s importance and requirements, and help to implement programs and procedures to promote ‘integrity every day, everywhere’.

Example

My co-workers and I follow company guidelines on travel expenses, but our supervisor does not appear to require the same of one of our co-workers. We don’t feel that we can change this situation because it is our supervisor.

What you should do

First, you should consider raising this issue with your supervisor. If you are uncomfortable raising the issue with your supervisor, contact the Legal Department, the Human Resources Department or use the confidential Integrity Helpline through one of the methods listed on page 5.



Guiding Principle:

Supervisors are responsible for helping their team members to comply with the Ethics Policy's core principles and its spirit

Applying the principle.

As an Adient supervisor, you have special responsibilities to promote and ensure ethical conduct in our organization. It's not enough for you to act with integrity yourself; you have a responsibility to inspire others to follow your lead. We expect you to:

Set an example.

- > Act with integrity and be a role model for your team. Demonstrate Adient values through your words and actions.

Promote an ethical culture.

- > Encourage employees to review our various policies and champion compliance. Help employees to understand their responsibilities.

Listen and offer guidance.

- > Be available and listen when employees come to you with questions or concerns. Discuss issues with them and assist them in making ethical decisions. Escalate issues to the Human Resources or Legal Departments.

Understand your duty to report.

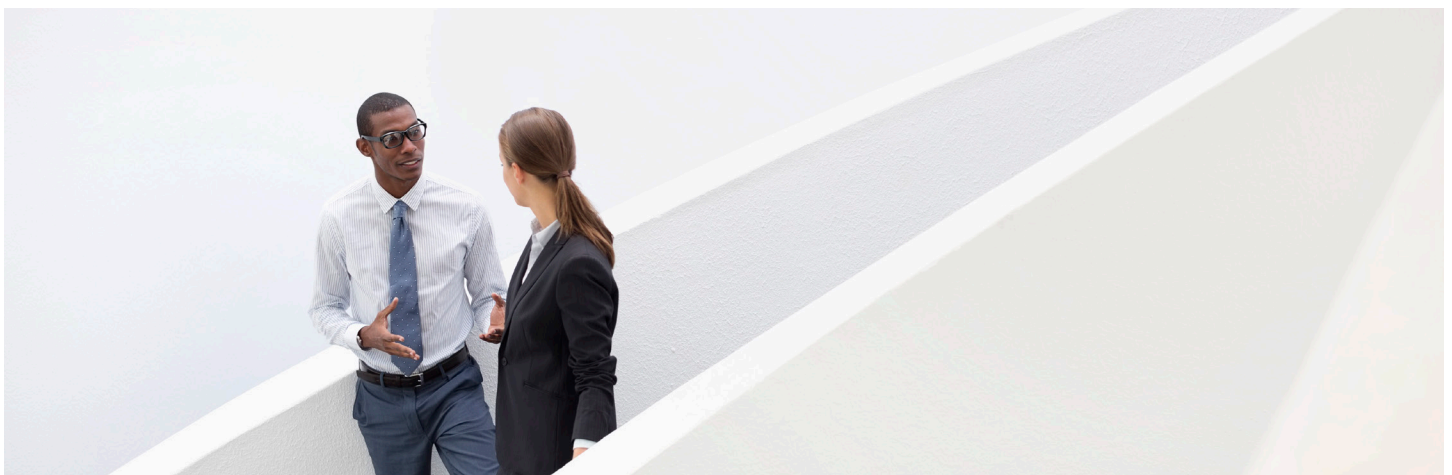
- > If you suspect behavior that is unethical or violates the law, Adient's Ethics Policy, or other Adient policies, report it immediately and encourage your employees to speak up.

Uphold Adient's no retaliation policy.

- > Take action to prevent retaliation against any employee who makes a good-faith report of a safety concern, violation of the law, Adient's Ethics Policy or other Adient policy.

Ask for help.

- > If you encounter a situation and you are unsure of the proper course of action, escalate to the Human Resources or Legal Departments for support.



Guiding Principle:

We safeguard the health and safety of our global team members



Applying the principle.

It is essential that our employees work in healthy and safe environments. Here's how you can help:

Always follow safety procedures and guidelines.

- > Understand and follow the safety policies and procedures related to your work.
- > Regularly look for ways to improve workplace safety.
- > Do your best to avoid accidents and to help others avoid them.
- > Report all accidents, near misses and safety issues.
- > Help to create a physically and emotionally safe workplace.

Do not commit or permit violence.

- > We do not tolerate violent behavior, threats to people or property, or physical intimidation or coercion.

Never be under the influence of drugs or alcohol at work.

- > At work, you must remain free from the influence of illegal drugs, alcohol or any substances that may impair your ability to work safely and effectively.
- > You must cooperate with any legal company searches of you or your workplace for alcohol or illicit drugs.
- > Report team members who work under the influence of alcohol or other substances that may impair their ability to work safely and effectively.

Example

I work in a plant where protective equipment is required. My co-worker never wears it. What should I do? Should I ignore it because it is his responsibility, not mine?

What you should do

Never ignore a safety issue. Employees are responsible for keeping a safe work environment. If you're uncomfortable reminding your co-worker that the safety rules protect everyone, talk with your supervisor or a member of the Human Resources Department.



Guiding Principle:

We are inclusive, value diversity and support team members in realizing their potential



Applying the principle.

Adient is committed to providing equal opportunities to all and provides equal opportunity in all employment actions such as recruitment, hiring, promotions, compensation, advancement, discipline, and termination. Here's how you can help:



Diversity Equity Inclusion

Respect equal opportunity.

- > Focus on the value that people add. We do not discriminate on the basis of race, creed, color, religion, sex, age, national origin, ancestry, citizenship, genetic information, pregnancy, sexual orientation, gender identity, marital status, familial status, disability status, status as a protected veteran, or any other factors protected by law.

Oppose harassment.

- > Do not tolerate physical or mental harassment or any other harmful behavior.
- > Harassment includes language or conduct that others may find derogatory, intimidating or offensive.
- > Immediately report all incidents of harassment to your supervisor, other members of management, the Human Resources Department or the Adient 24-hour Integrity Helpline.
- > Do not tolerate retaliation against anyone for raising a good-faith complaint of harassment or discrimination.

Value diversity and inclusion.

- > Hire and develop the best and brightest talent.
- > Create an environment where employees can be their authentic and best self.
- > Build an inclusive supply chain that fosters innovation and economic development through greater supplier choice.
- > Invest in the communities in which we operate.

Where can I find more information?

For more information and guidance, please go to Adient's Commitment to Diversity, Equity and Inclusion statement available at www.adient.com/about-us/sustainability or visit the Diversity, Equity and Inclusion portal page on Adient Connect.

Example

I overheard a new employee's co-workers make fun of his accent, and I can tell it makes him uncomfortable. What should I do?

What you should do

Do not join in or encourage this behavior. Words and actions need to express respect for each person's dignity. If you don't feel comfortable asking the co-workers to change their behavior, mention your concern to your supervisor or to a member of the Human Resources Department.

Guiding Principle:

We are committed to a sustainable future for our employees, customers and communities



Applying the principle.

We are committed to operating our business in an environmentally responsible manner. Adient’s annual Sustainability Report outlines our company’s ESG (Environmental, Social, Governance) actions, targets and performance. We recognize the importance of robust corporate governance policies, practices and processes in ESG. Here’s how you can help:



Creating
a sustainable future
together

Environmental

- > Take actions at work that help conserve natural resources and reduce energy use.
- > Follow the “Three R’s” — Reduce, Reuse, Recycle — whenever possible.
- > Inform your supervisor, or the Integrity Helpline, of any processes, policies or actions you encounter that do not promote environmental responsibility.

Social

- > Treat your colleagues the way you would like to be treated — with respect and dignity.
- > Use Adient’s Human Rights Policy Statement and Adient’s Commitment to Diversity, Equity and Inclusion statement to help guide your actions.
- > Report any violations of discrimination, harassment or other Adient policies to your supervisor, the Human Resources Department or the Integrity Helpline.
- > Ensure our company and our supply chain is free of forced, child or involuntary prison labor.

Governance

- > Follow all Adient policies that govern how we do business — e.g., this Ethics Policy, Adient’s Anti-Bribery and Anti-Corruption Standard, our Terms and Conditions, etc.

Where can I find more information?

The latest corporate Sustainability Report, along with Adient’s Human Rights Policy Statement and Commitment to Diversity, Equity and Inclusion statement, are available at www.adient.com/about-us/sustainability.



Guiding Principle:

We protect the privacy of all individuals



Applying the principle.

We use personal data only to support Adient operations and to provide employee benefits. We inform individuals about the collection and processing of their data, as well as their rights regarding their personal data. We have safeguards to protect personal data, we limit data access to employees who need it for business purposes, and we follow local data protection and privacy laws. Here's how you can help:

Follow data protection policies.

- > You're required to follow Adient policies to protect data and privacy. If you don't understand a policy or procedure, you're responsible for getting an explanation.

Be careful not to breach privacy.

- > Gather only the information that you need for your work.
- > Unless you have authorization, do not access any system or database containing private information, such as employee or personnel records, customer forms, email or your co-workers' personal messages.
- > Use data for the original business purpose only.
- > Make sure that you do not inadvertently disclose personal data by accessing or sending it.
- > Do not keep personal data for longer than required for the business purpose.
- > Immediately inform the Privacy Office or the Legal Department if you suspect that a potential privacy breach occurred or if you learn that an Adient vendor's data has been compromised.
- > Do not send personal data from Adient to suppliers or vendors without privacy terms in the contract and before a privacy assessment is completed.

Where can I find more information?

If you have any questions or concerns about data protection or privacy, talk with a member of the Privacy Office (ae-privacy@adient.com) or one of the other contacts listed on page 5, Reporting Concerns and Asking Questions, of this policy.

Example

I believe our new external data hosting provider did not sign a contract containing privacy clauses. What should I do?

What you should do

Reach out to the Adient business process owner. Ask if privacy clauses that permit personal data access for this supplier were included in the contract. Ask if the supplier successfully completed Adient's privacy due diligence process. Reach out to the Privacy Office for any questions about privacy terms or assessing suppliers for privacy compliance.

Guiding Principle:

We respect freedom of association and obey all the laws on working hours and compensation

Applying the principle.

Every employee has the right of association and to work within the limits established by law. We fairly compensate our employees. Remember:

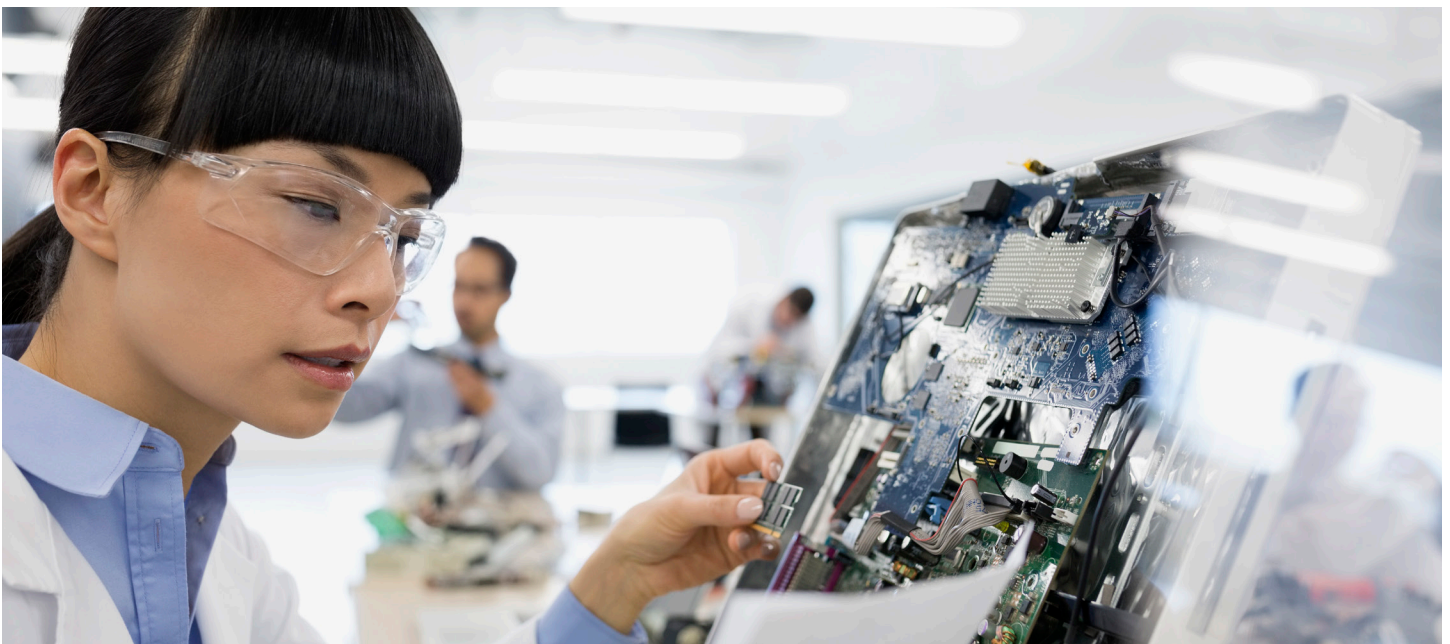
- > We respect the right to organize and bargain collectively.
- > We give workers' representatives the access necessary to carry out their required functions.
- > We do not discriminate against workers' representatives.
- > Our team members work within the limits established by law.
- > When circumstances require you to work beyond normal hours, we provide benefits or overtime compensation as required by law.
- > We will pay fairly in the market and meet or exceed all legal requirements related to compensation.
- > You will receive at least the legally required minimum wage or the prevailing industry wage, whichever is higher.
- > Adient will give you full details on payroll deductions for taxes and benefits.

Example

My supervisor occasionally asks me to work longer than the official working hours. He tells me that I need better time-management skills, so to make up for it I have to work longer without recording my extra hours. What should I do?

What you should do

Employees must receive compensation for work as local laws require. If you are not comfortable discussing your concerns with your supervisor, bring this issue to the attention of higher-level management or to a member of the Human Resources Department.



Guiding Principle:

We believe human rights are fundamental to society and imperative to the success of our business



Applying the principle.

We are committed to protecting the safety, well-being and rights of all people with whom we are in contact, including our employees, contractors, vendors, suppliers, customers and communities. We reinforce this commitment in our policies and supplier expectations. We expect you to:

- > Raise a concern if you believe there has been a human rights violation or any violation of law or regulation.
- > Ensure third parties have gone through proper due diligence and screening processes.

Remember:

- > All complaints of alleged human rights violations, ethical concerns or claims of harassment or discrimination are investigated and appropriate disciplinary action is taken.
- > We expect our suppliers to follow the principles of the UN Global Compact.
- > We are committed to a supply chain free of forced, child or involuntary prison labor.

Where can I find more information?

Additional information about our Human Rights Policy Statement, Sustainability Report and supplier requirements is available at www.adiant.com/about-us/sustainability and www.adiant.com/suppliers/supplier-expectations.



Guiding Principle:

We obey the laws, rules and regulations of all the countries in which we conduct business



Applying the principle.

As a global company, Adient must follow the laws and regulations of each country in which it operates.

Here's how you can help:

Follow Adient's policies and procedures.

- > Our policies reflect the laws of the countries where we do business, and they're often more demanding than some laws require.

Follow the laws that apply to your work.

- > If you're not sure which laws apply, or you think that the laws of two or more countries conflict, ask members of the Legal Department for help.
- > Ask questions and report any known or possible violations of the law by Adient's employees or its business partners to your supervisor, another supervisor, the Human Resources Department, the Legal Department, or the Integrity Helpline.
- > Do not tolerate retaliation against anyone for asking questions or raising good-faith concerns about possible Ethics Policy violations.

Example

I'm working on a project in another country. My co-workers are doing things that I think would be illegal in my country, but they assure me that this conduct is legal here. I don't want to get myself or Adient in trouble, but I also don't want to harm my relationship with my team or make a big deal out of nothing.

What you should do

You are responsible for seeking assistance in learning what is legal and for ensuring that your actions are legal. Promptly contact a member of the Legal Department.



Guiding Principle:

We protect Adient's confidential information and respect that of our customers

Applying the principle.

Sharing the Company's confidential information is not allowed. Remember:

Protect confidential information about Adient's products, activities, performance and plans.

- > Disclose confidential information only on a 'need-to-know' basis, even with other Adient employees.
- > Never disclose confidential information outside of Adient unless you already have a non-disclosure agreement or a confidentiality agreement approved by the Legal Department.
- > Secure confidential information where others cannot see when you are not reviewing it.
- > Report all suspected breaches of confidentiality.

Protect third-party, non-public information.

- > Do not seek or receive trade secrets or confidential information of customers or business partners unless the disclosure is covered by a non-disclosure or confidentiality agreement approved by the Legal Department.
- > Follow all customer confidentiality requirements.
- > We compete fairly and honestly. Do not use illegal or unethical means to learn a competitor's confidential information.
- > If you have non-public, confidential information from previous employment with a competitor, then you must continue to keep that information confidential, even from Adient.

Protect Adient's confidential information.

- > Safeguard all intellectual property, including copyrights, patents, licenses, trademarks and other trade secrets.
- > Protect all of Adient's confidential information even after you stop working with Adient.



Guiding Principle:

We act in Adient's best interests and do not put personal interests ahead of Adient's interests



Applying the principle.

- > Promote Adient's best long-term interests when making business decisions.
- > Do not seek or receive personal gain for yourself, your close family or friends, beyond your normal company pay, for being an Adient director, officer, employee or contract worker.
- > Disclose any potential situation in which your close family, friends, or business associates might profit based on your relationship with Adient. All potential, perceived or actual conflicts of interest must be disclosed to the Legal Department. To do so, use this form: <https://adientcoi.ethicspoint.com/>.
- > Report financial interests that you and your family have in entities that do business with Adient.
- > Do not pursue any business opportunity that you discover through your association with Adient for personal gain of yourself, close family and friends or the gain of any entity other than Adient.
- > Do not work for a customer, supplier or competitor of Adient while Adient employs you.
- > Use company funds prudently for the best business purposes of Adient only.
- > You are personally accountable for your use of company funds in any form.

Where can I find more information?

For more information and guidance on conflicts of interest, please go to the Conflicts of Interest Standard on the Compliance and Ethics portal page on Adient Connect. If you have any questions or concerns about possible conflicts of interest, talk with a member of the Legal Department, the Human Resources Department or one of the other contacts listed on page 5, Reporting Concerns and Asking Questions, of this policy.

Appearances matter!

Avoid even the appearance of impropriety. Although Adient encourages you to build strong relationships with customers and suppliers, avoid any situation that looks like it could affect your judgment. Examples include having an ownership interest in, or being a director of a firm that sells to, purchases from or competes with Adient. Report any such situations to a supervisor or to the Legal Department as soon as they occur via the conflict of interest on-line disclosure form and recuse yourself from the potentially conflicted activity until the conflict is resolved.



Guiding Principle:

We do not offer, give or accept gifts that violate our policies or create an appearance of impropriety

Applying the principle.

- > Think about how it will appear if you accept gifts or entertainment from potential or existing suppliers or customers wanting to do business with Adient. When possible, seek guidance before giving or receiving things of value, especially if you are in doubt whether the other party is a government employee or official. If you personally accept something of more than minimal value, you must keep a record of it and report it promptly to your supervisor.
- > Never offer a gift or entertainment to influence a business or government decision.
- > Never accept gifts or entertainment where doing so would make it difficult to exercise fair and unbiased judgment, where it exceeds modest value or is contrary to commonly accepted business practices.
- > It is never proper to provide or receive gifts or entertainment to/from a government official unless pre-approved by the Legal Department.
- > Understand that the definition of government official is broad and includes employees of government-owned entities.
- > Ensure that charitable donations are vetted with the Legal Department and that approved donations are, where possible, made to an organization and not to an individual.
- > Keep in mind that Adient employees are not permitted to purchase any type of gift or entertainment with their own money for business partners, suppliers, or customers.
- > When dealing with existing and potential commercial business partners, suppliers, or customers, ensure any gifts and entertainment are modest, occasional, and comply with applicable laws, regulations, local customs, and Adient's Gifts and Entertainment Standard.

Where can I find more information?

For more information and guidance on this topic, please go to the Gifts and Entertainment Standard on the Compliance and Ethics portal page on Adient Connect.

Can I accept gifts or entertainment from business partners or suppliers?

You may accept business gifts or entertainment of minimal value. You may not directly or indirectly offer, promise or accept gifts or entertainment as a condition or result of doing business with Adient. The test: could a reasonable person think that the gift or entertainment might influence your business judgment? If so, you must refuse it. If in doubt, seek guidance from the Legal Department.

Example

My co-worker is visiting a customer tomorrow, and asked if I could get an expensive watch in the customer's favorite style. My co-worker says he plans to use the watch to get some information from the customer on our biggest competitor. What should I do?

What you should do

Do not help your co-worker to use improper means to obtain a competitive advantage. If talking to your co-worker does not work, then promptly inform your supervisor or a member of the Legal Department.

Guiding Principle:

We do not engage in insider trading



Applying the principle.

Buying or selling stock, or telling others to buy or sell stock, on the basis of material, non-public information is called ‘insider trading’ and it is illegal. Accordingly, any Adient employee must avoid buying or selling any stock or securities of any company, including Adient, when he or she has ‘material’ and ‘non-public’ information about that company. ‘Material information’ is anything that a reasonable investor would consider important before investing in a company, such as information about financial results, strategic transactions, new products and similar types of information that have not yet been made public. Information is ‘non-public’ if it has not been broadly disseminated to the general public. Remember:

- > Do not engage in insider trading. This includes family members, relatives, and friends.
- > Do not buy or sell any company’s stock, including Adient’s stock, based on information that you learned in the course of your work for Adient if that information has not yet been made public.
- > Do not discuss non-public information about Adient, or about any other company, that you learned in the course of your work for Adient, with those outside the company, including through blogs or other social media, except as required by your regular employment duties. Rumors, even if accurate and reported in the media, are not considered public information.
- > Media or shareholder inquiries about the Company should be directed to the Communications or Investor Relations Departments.

Where can I find more information?

If you have any questions or concerns about possible insider trading please contact Adient’s Shareholder Services or one of the other contacts listed on page 5, Reporting Concerns and Asking Questions, of this policy.

When is information considered public?

Information is considered publicly available only when it has been released to the public through appropriate channels (such as a company press release or public filings required by law) and the investing public has had sufficient time to absorb and evaluate its impact. When in doubt, contact Shareholder Services.



Guiding Principle:

We are committed to complying with applicable laws and regulations aimed at combating money laundering and terrorist financing



Applying the principle.

Money laundering means exchanging money or assets that were obtained criminally for money or other assets that are 'clean'. The clean money or assets don't have an obvious link with any criminal activity. Money laundering also includes money that's used to fund terrorism, however it's obtained.

We will only conduct business with customers who are involved in legitimate business activity and whose funds are derived from legitimate sources. We expect you to:

- > Stay alert for signs of potential money laundering and other crimes.
- > Use good judgment and pay close attention when working with customers and third parties.
- > Always know who's behind every transaction and only conduct business with reputable third parties engaged in legitimate business activities.
- > Report suspicious activities and transactions to the Legal Department.

Remember:

- > We must make every effort to combat money laundering and terrorism financing.
- > We should verify the identity and economic background of our business partners.
- > We should check the origin of payments to ensure they come from legitimate sources.



Guiding Principle:

We are committed to providing safe, good-quality products and services; we address and do not hide risks or mistakes

Applying the principle.

The Ethics Policy includes our commitment to providing safe and good-quality products, services and solutions. Here's how you can help:

You should immediately contact quality management professional or your supervisor if you believe there is:

- > Any deficiency in product design, installation or maintenance that threatens anyone's health or safety.
- > Anything that may harm the quality of our products or services.
- > Anything that may harm Adient's reputation.
- > Anything that may harm Adient's financial interests.

Counterfeit parts.

- > We are committed to preventing the use of counterfeit parts.
- > We follow contractual and legal intellectual property rights and we require that the our suppliers warrant that their products are free from any intellectual property violation.

Where can I find more information?

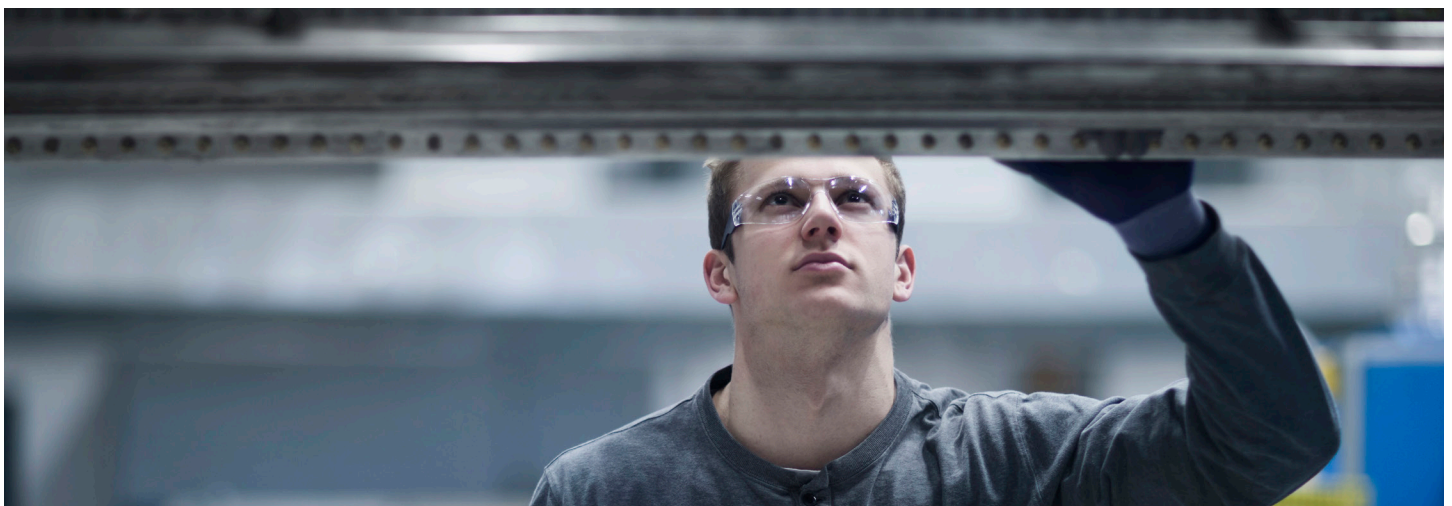
If you have any questions or concerns about possible risks, talk with a quality management professional or one of the other contacts listed on page 5, Reporting Concerns and Asking Questions, of this policy.

Example

I believe that our product's new design has a chance of making it unsafe. I reported this to my supervisor, who agrees but doesn't want to say anything because we've already manufactured this product, and the risk of causing harm seems small.

What you should do

Do not hide anything that you believe poses a reasonable risk to our quality, services, reputation or interests. Bring this issue to the attention of higher-level management or use the confidential Integrity Helpline through one of the methods listed on page 5.



Guiding Principle:

We use Adient assets such as email, Internet access, telephones and computers responsibly

Applying the principle.

Adient computing resources should be used for Company purposes. Information on Company computer systems, including email and other Internet-related systems, is the property of Adient, to be used for Company business. We expect you to:

- > Follow Adient's Acceptable Use Policy when using Company computer systems.
- > Do not use Company resources to offend, harass or threaten others or to access, send or store illegal or generally offensive material.
- > While you're at work or using a Company computer or mobile device, do not visit Internet sites with offensive content related to sex, race, religion or other protected categories.
- > Do not use Company resources to reproduce, display, distribute, or store materials that violate any party's trademark, copyright, licensing or other intellectual property rights.
- > Use assets such as Company vehicles properly and legally, for business purposes and for authorized personal use.
- > Limit use of non-Adient apps because of their lack of security and data protection. Non-Adient apps should only be used if the data exchanged does not include proprietary Adient, customer or personal information or any confidential or competitively sensitive information. Whenever possible, do not use a non-Adient app for the exchange of business-related data or attachments.

Remember:

- > Use electronic media properly.
- > Use Company equipment and resources for business purposes.
- > Use social media responsibly and in accordance with Adient's Social Media Policy.

Example

May I use my Adient email account for personal messages?

What you should do

Adient computers and email accounts, and the information they contain, are Adient property and should be used for work purposes and with limited personal use consistent with the Adient Acceptable Use Policy. Because Adient owns these assets, management may inspect and disclose the contents of Adient computers and work email accounts, subject to local laws. Management may do this for business purposes or to detect potential criminal conduct and protect Adient rights and property.

Guiding Principle:

We do not tolerate, and we actively oppose, bribery and corruption in our businesses



Applying the principle.

We win business with the integrity of our products, services and personal character. We do not seek business by trying to corrupt the judgement of our customers. We do not tolerate bribery of individuals or organizations. We neither provide nor receive lavish or extravagant gifts or business courtesies.

Remember:

- > Follow the gifts and entertainment requirements as explained on page 18 of this Ethics Policy and in Adient's Gifts and Entertainment Standard.
- > Do not offer, pay, give, authorize or promise any favor, service, entertainment, meal, gift or any other thing of value to any government employees, or political official, political party, candidate or their family members to get preferential treatment for Adient or influence a business decision.
- > Do not pay 'grease' or facilitation payments. These are small bribes to individuals to make them perform a government service to which you are already entitled.
- > Do not offer employment, benefits, other profitable opportunities or anything of value to government employees and officials, or to private citizens who can provide Adient with an economic advantage without first consulting with the Legal Department.
- > Obey all local anti-corruption and bribery laws.
- > Accurately record in Adient's systems all of your transactions including your expenses and any gifts, entertainment or donations that you provide.
- > Do not associate with business partners who engage in corrupt practices. Regularly screen business partners and stop working with them if you reasonably suspect corruption.

Example

A government official solicits a low dollar payment from you for a routine process that does not usually require a fee. You are skeptical that this is a required administrative fee and are unsure whether you should make the payment.

What you should do

Do not make the payment, despite the low amount, and contact your supervisor and the Legal Department. Always ensure that what you are being asked to pay by a government official is an appropriate fee and if you are unsure, question it and refuse to pay.

Doing business without integrity causes misery in the world

Bribery and corruption cause real economic harm and misery in many parts of the world, and contribute to social and political instability experienced in many countries. Adient believes that doing business with integrity enhances our business performance, our company's reputation, and is fundamental to our growth and long-term success. We believe that doing business with integrity is the only way to do business.

Guiding Principle:

We ensure that our books and records are accurate, complete and maintained according to the law and industry best practices

Applying the principle.

Keep accurate books, accounts and records. Remember:

- > Company books and records must be complete, accurate and reliable, following Generally Accepted Accounting Principles.
 - Be precise and complete when you record transactions.
 - Don't make false or misleading entries, or omit or conceal required information, such as the payment amount or its actual purpose.
 - Follow laws, regulations, industry standards and Company policies when you produce, store or destroy records and documents.
 - Do not keep hidden or unrecorded funds, accounts or assets.
 - Maintain the supporting documentation required by relevant policies.
- > Anyone who falsifies, hides or manipulates records faces disciplinary action, termination and personal liability.
- > If you find errors, or can't reconcile an account, notify management so the account can be corrected.
- > Follow the law and Adient policies on document and record retention.
 - When destroying records or documents, follow the procedures required by local law and Adient's document-retention policies.

Where can I find more information?

If you have any questions or concerns, you can get copies of finance and accounting policies that apply to your work from your supervisor, the Internal Audit Department, the Corporate Accounting Department, other members of the Finance Department or one of the other contacts listed on page 5, Reporting Concerns and Asking Questions, of this policy.



Guiding Principle:

We believe in vigorous competition and do not use illegal or unethical means to gain an advantage over a competitor



Applying the principle.

Using illegal or unethical means to obtain a competitive advantage is prohibited. Here's how you can help:

- > Follow all antitrust and competition laws in countries where Adient operates.
- > Follow Adient's Competitive Behavior Standard and applicable policies.
- > Do not join Adient competitors or business partners in agreements or understandings that limit competition.
- > For example, do not agree to fix prices, rig bids, divide up products, territories, customers or markets, or limit production or sale of products.
- > Do not make false, baseless or misleading remarks about Adient, its competitors or their products.
- > Do not share competitively-sensitive information with competitors.

Where can I find more information?

If you have any questions or concerns about possible violations of competition or antitrust laws, talk with a member of the Legal Department or one of the other contacts listed on page 5, Reporting Concerns and Asking Questions, of this policy.



Guiding Principle:

We comply with international trade laws



Applying the principle.

We follow the trade laws of all countries where Adient conducts business, including laws concerning:

- > Importing or exporting specific goods, services or technology.
- > Prohibiting transactions with specific countries, entities or people.
- > Participating in international boycotts.
- > Government approval, licenses or any other requirements necessary to complete a transaction or sale.
- > Product labelling.

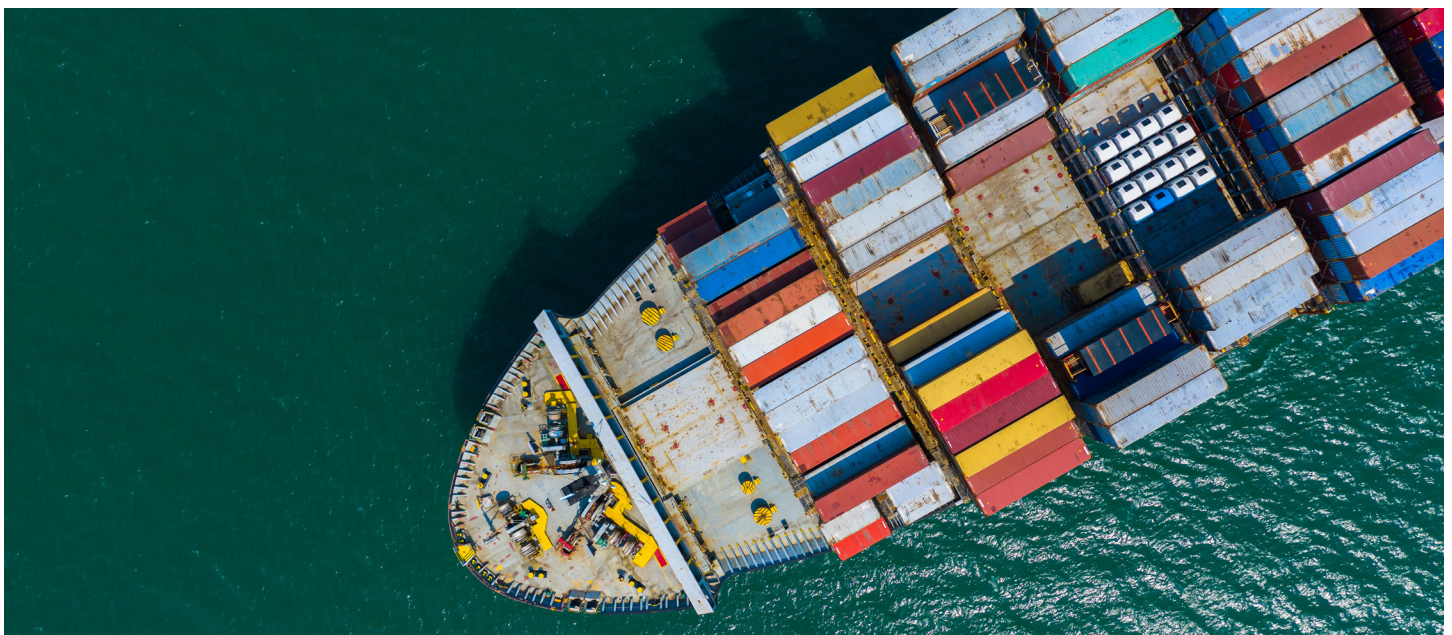
Here's how you can help:

- > Keep accurate records of all international transactions.
- > Follow all of Adient's policies and processes when selling, or delivering, shipping, receiving, importing or exporting products that involve other countries (the cross border movement of items).
- > Make efforts to ensure that customers, business partners, suppliers, service providers, agents, consultants and distributors follow Adient policies and procedures.
- > Engage companies and business partners that agree to comply with international trade laws.
- > Do not do business with prohibited countries or parties (including companies, entities, individuals, or governments).

Where can I find more information?

If you have any questions or concerns, you can get copies of policies that apply to your work from your supervisor, a member of Adient's Global Customs & Trade Compliance Department, or one of the other contacts listed on page 5, Reporting Concerns and Asking Questions, of this policy.

For more information and guidance on this topic, please go to the Global Customs and Trade Compliance (GCTC) portal page on Adient Connect.



Guiding Principle:

We collaborate with our suppliers to ensure compliance with all laws and adherence to the same ethical standards to which Adient holds itself

Applying the principle.

Adient sources from suppliers that meet our high standards and act in ways that positively reflect on our organization. We expect our suppliers to comply with the principles of Adient's Ethics Policy, our Global Supplier Standards Manual, our Terms & Conditions and our sustainability principles enunciated in our Sustainability Report. These principles include adherence to concepts of anti-bribery and anti-corruption, competition law, sanctions laws, responsible sourcing of materials, diversity, equity and inclusion, and environmentally sustainable practices, among others. We expect you to:

- > Consult with the Purchasing Department, the Legal Department and other subject matter experts when selecting third parties.
- > Ensure that third parties have received the appropriate due diligence.

Remember:

- > We require disclosures of potential conflicts of interest with our suppliers.
- > We do not permit improper gifts or entertainment with our business partners or any other activity that improperly influences business decisions or creates an appearance of impropriety.
- > Adient takes a risk-based approach to screening its supply base for compliance with laws and requirements.



Guiding Principle:

We strictly limit the use of Company resources to support political campaigns or causes



Applying the principle.

Generally, Adient does not get involved in political campaigns or political issues. Decisions on whether the company will support a political candidate or issue must be made at a high level within Adient. Here's how you can help:

- > Never offer contributions, payments or anything of value from Adient to government employees, officials or political candidates with the intent to influence them or gain an improper advantage for the Company.
- > Always get Legal Department approval before offering or using any Adient funds, services or other resources to support any official, political organization or candidate.
- > Accurately document in Adient's expense systems any donation or contribution to any campaign, political organization or candidate.

Example

My good friend is running for public office. He has asked me to distribute campaign material to my co-workers.

What you should do

Adient does not restrict your personal political activities away from the company using personal funds. But you cannot campaign during your work hours or use any company resources (such as materials, services, equipment or work time) to support such activity.



Guiding Principle:

We communicate accurately with the public



Applying the principle.

We ensure that our communications are truthful and accurate. We do not release misleading information.

Remember:

- > Do not speak to the media unless you have been specifically authorized by the Communications Department. Refer media questions about Adient to the Communications Department.
- > Take care when discussing Adient outside the company – in public places, with friends and family, and on the Internet, in public forums, blogs and social-networking sites.
- > Never disclose private company information without prior and proper authorization.
- > Neither say nor imply that you represent the Company unless you're actually authorized to do so.
- > Only those expressly authorized by the Communications Department may speak on behalf of Adient.
- > When speaking at conferences, industry meetings, etc., be sure to clarify that your remarks and comments are your own, unless you have been specifically authorized by the Communications Department to speak on behalf of Adient.
- > If you are authorized by the Communications Department to speak on behalf of Adient, you must provide accurate information and avoid speculating.

Where can I find more information?

If you have any questions or concerns, you can get copies of policies that apply to your work from the Communications Department or one of the other contacts listed on page 5, Reporting Concerns and Asking Questions, of this policy.



To make an ethical decision, ask yourself these questions:



1. Is the action or decision consistent with the letter and spirit of the Ethics Policy?

> When in doubt, ask – talk to your manager or supervisor, the Legal Department or contact the Integrity Helpline.

2. Is it legal?

> If it isn't, don't do it.

3. Does it follow Adient policies and procedures?

4. What would others think of my decisions or actions?

> How would it make me feel if my actions or decisions were known to my family? My friends?

> How would I explain to those affected by my actions or decisions?

5. How would I feel if my actions appeared in the news media, on television or on the Internet?

For additional resources, please visit the Compliance and Ethics portal page on Adient Connect to view applicable Compliance policies and procedures.

You may reach the Adient 24-hour Integrity Helpline:

> Via the Internet: <https://adient.ethicspoint.com>

> Free telephone numbers in most local languages can be found at:

<https://adient.ethicspoint.com>

> Scan the QR code below:



Effective date: October 2016/Updated June 2023. The June 2023 Ethics Policy supersedes all previous ethics policies. Adherence to this Ethics Policy is a condition of employment with Adient, but this behavioral requirement does not create an employment contract or an offer of employment. The Ethics Policy is not all-encompassing. Bring questions about situations not discussed here to your supervisor, the Legal Department, the Human Resources Department or the Internal Audit Department.

Waiver: Any waiver of this Policy for anyone covered by the Policy who is not an executive officer or director of Adient may only be made by the Adient Chief Executive Officer or a designated stand-in. Any waiver of this Policy for an Adient executive officer or director shall be made in writing pursuant to the Adient Corporate Governance Guidelines. Adient retains the right to modify this policy or any of its sections at any time, to make it more adaptable to the evolving needs of Adient, its employees, customers or applicable laws. Any alleged violation of the Ethics Policy by Adient executive officers should be reported to the Audit Committee of the Board of Directors or the Integrity Helpline. Reports of possible violations of financial or accounting policies may be sent to the attention of the chair of the Audit Committee at 49200 Halyard Drive, Plymouth, Mich. 48170.

Version Control: This document version and all printed versions of this policy are for reference only and are considered as uncontrolled. The controlled copy of the policy (latest approved version) is located in the online BOS document library under document number AE-LOS-PY-01. The Policy found at <https://ethics.adient.com> is also considered a reference copy.



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