



Response Regarding Bill S-211

1. Structure, Activities and Supply Chain

1-a Arvin Sango Canada, Inc. (ASCI) located at 2330 Discovery Drive London, Ontario

1-b ASCI is an automotive supplier of emissions and body products.

1-c ASCI produces, sells, and distributes good in North America to customers in Canada and the United States

1-d ASCI is wholly owned entity Arvin Sango, Inc. Madison, IN, USA, headquarters located at 2905 Wilson Ave Madison, IN

1-e Arvin Sango, Inc., is a member of the Sango Company Ltd. group, headquarters located in 1-3-1 Mutsuno, Atsuta-ku, Nagoya, Aichi, JAPAN

1-f ASCI's supply chain consists of suppliers located in North America and Asia

2. Single or Joint report

2-a Report in respect to the entity ASCI

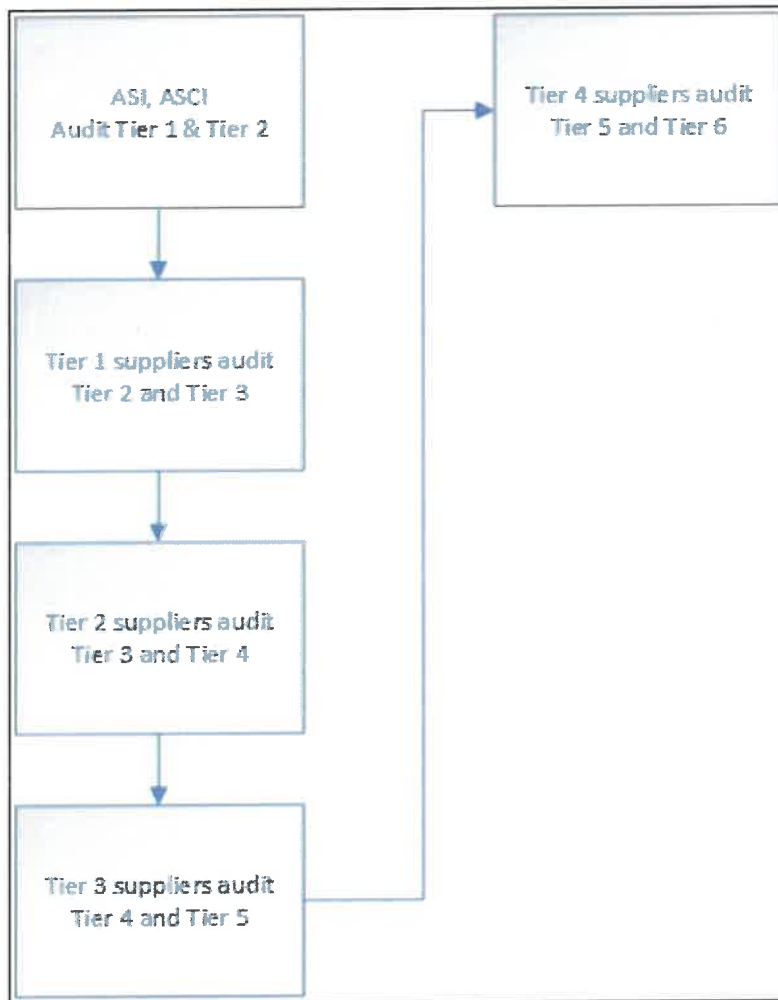
3. Supply Chain Maps

3-a

Tier 1 Commodity Name	Level of Lower Tier (2,3,4, etc.)	Lower Tier Component or Material Name	Lower Tier Supplier Corporate Name	Lower Tier Supplier Plant Name	Plant Country	Plant City	Plant Street Address	Plant Postal Code
Assembly Stampings	2	Nuts	INDIANA AUTOMOTIVE		United States	Greenfield	1300 Anderson Blvd	46140-7934
Assembly Stampings	2	Nuts	SUNRIGHT AMERICA, INC.		United States	Columbus	6205 S International Dr	47201-3034
Catalytic Converter	2	OCO	Arvin Sango, Inc.	TOYOTA TSUSHO AMERICA, INC.	United States	Madison	2905 Wilson Avenue	47250
Catalytic Converter	2	Seal	3M COMPANY	AUTOMOTIVE INNOVATION CENTER	United States	19460 Victor Pkwy	Livonia	48152-1061
Catalytic Converter	2	Catalyst	CATALER NORTH	CNA	United States	2002 Cataler Dr	Lincolnton	28092-6138
Door Side Impact Beam	3	Steel Slitting	TOYOTA TSUSHO	LOGISTICS WAREHOUSE	United States	Georgetown	702 Triport Rd	40324-8974
Door Side Impact Beam	2	Tubing	Arvin Sango, Inc.	TOYOTA TSUSHO AMERICA, INC.	United States	Madison	2905 Wilson Avenue	47250
Door Side Impact Beam	2	Tubing	Arvin Sango, Inc.	TOYOTA TSUSHO AMERICA, INC.	United States	Madison	2905 Wilson Avenue	47250
Exhaust Systems	2	Stamping	Millenia Metals LLC		United States	Itasca	1345 Norwood Ave	60143-1126
Exhaust Systems	2	Chrome Tip	Shanghai Baolong		China	SHANGHAI	5500 Shengyuanlu	200123
Exhaust Systems	2	Nuts	MacLean Fogg		United States	Mundelein	1000 Allanson Rd	60060-3804
Exhaust Systems	2	Stampings	DAE HAN MEXICO, S.A.	TOYOTA TSUSHO Mexico, INC.	Mexico	Monterrey	Priv Monterrey 1600	64268
Exhaust Systems	3	Steel Slitting	TOYOTA TSUSHO	LOGISTICS WAREHOUSE	United States	Georgetown	702 Triport Rd	40324-8974
Exhaust Systems	2	Tubing	Arvin Sango, Inc.	TOYOTA TSUSHO AMERICA, INC.	United States	Madison	2905 Wilson Avenue	47250
Exhaust Systems	2	Muffler	Arvin Sango, Inc.	TOYOTA TSUSHO AMERICA, INC.	United States	Madison	2905 Wilson Avenue	47250
Exhaust Systems	2	Muffler Inner Tubing	Fischer Tubetech Inc.	TOYOTA TSUSHO Mexico, INC.	Canada	Waterloo	190 Frobisher Dr	N2V 2A2
Exhaust Systems	2	Muffler Support Tubes	DAE HAN MEXICO, S.A. de C.V.	TOYOTA TSUSHO Mexico, INC.	Mexico	Monterrey	Privada Monterrey 1799	64268
Exhaust Systems	2	Sub-Muffler	Arvin Sango, Inc.	TOYOTA TSUSHO AMERICA, INC.	United States	Madison	2905 Wilson Avenue	47250
Exhaust Systems	3	Sub-Muffler Inner tube	Ditech	TOYOTA TSUSHO AMERICA, INC.	United States	Edinburgh	1151 S Walnut St	47250
Exhaust Systems	2	Weld Wire	National Standard		United States	3602 N Perkins Rd	Stillwater	74075
Exhaust Systems	2	Flex Tube	Witzenmann Group		United States	1201 Stephenson Hwy	Troy	48083-1105
Submuffler	2	Submuffler Wool	Arvin Sango, Inc.	Owens Corning	United States	Madison	2905 Wilson Avenue	47250

3-a cont.

ASI issues notification to the supply base for human rights, child labor monitoring expectations by the below flow chart



3-b Policies and due diligence processes

As a member of the Sango Ltd., Group, ASCI abides by the Sango Group Human Rights Policy



Sango Group Human Rights Policy

We, the Sango Group, wish to contribute to the sustainable development of a harmonious balance between society and the Earth through our corporate activity. At the same time, we recognize that this can only be achieved when all Sango Group activities respect human rights.

This philosophy is articulated in this "Sango Group Human Rights Policy" (hereinafter: "Policy").

In the development of a Sango Group global footprint, this Policy has been established as the top human rights policy within the Sango Group, and all members of the Group are expected to observe it.

1. Basic Policy

The Sango Group supports such international as the UN's "International Bill of Human Rights" and the "ILO Declaration on Fundamental Principles and Rights at Work" of the International Labour Organization (ILO). Along with respecting these norms, we also consider them to be a framework for the execution of the UN "Guiding Principles on Business and Human Rights" and we adhere to the laws of the countries and regions where business activities are conducted. In cases where international norms and a certain country's laws differ, we will follow whichever standard is higher, or, in the case where they conflict, we will seek ways to respect international human rights norms.

2. Scope

This Policy applies to all executives and employees of the Sango Group. In addition, we ask all business partners, including suppliers for their understanding and support of this Policy.

3. Responsibility for Respecting Human Rights

We are aware of the potential negative impact on society that Sango Group business activities could have. The Sango Group will strive to ensure that no infringement of human rights occurs to people affected by our business activities, and in the case where a negative impact on human rights occurs, we will respond appropriately to take corrective action.

<Priorities >

The Sango Group places the following themes as priorities with regard to respecting human rights.

- Forced labor
- Child labor
- Unfair treatment of foreign workers
- Harassment
- Discrimination, diversity

4. Human rights risk assessment, infringement prevention, and relief

The Sango Group will endeavor to construct a system of human rights due diligence, identify negative impacts on human rights, and strive to prevent or mitigate such negative impacts. In addition, if Sango Group business activities directly lead to a negative impact on human rights, or indirectly leads to a negative impact through business partners, etc., or a clear promotion of such a situation occurs, the Sango Group will take up relief measures and the prevention of recurrence through dialogue and appropriate procedures.

5. Training and awareness activities

To ensure that this Policy permeates both within the company and externally, the Sango Group will carry out appropriate training and awareness activities for all executives and employees, striving to mitigate or prevent any negative impact on human rights. In addition, the Policy will be reflected in any policy, guideline or work procedure related to this Policy.

6. Dialogue and discussion with stakeholders

In the process of executing this Policy, the Sango Group will hold sincere dialogue and discussions with stakeholders.

7. Confirmation of progress and disclosure of information

The Sango Group will monitor the status of adherence to this Policy and make improvements where necessary. In addition, the status of initiatives related to human rights will be disclosed on the Sango web site.

This Policy has been approved by the board of directors for Sango Co., Ltd. and signed by the President and CEO.

Established: July 28, 2023

Sango Co., Ltd.

Representative Director & Executive President

Sango Group supports international policies as indicated by the laws of the countries and regions where business activities are conducted.

ASCI ensures compliance with all applicable federal, state, and local laws and or regulations by ASI/ASCI Code of Conduct.

3-b cont. ASI/ASCI Code of Conduct



Arvin Sango, Inc. Code of Business Conduct and Ethics

INTRODUCTION

This Code of Business Conduct and Ethics (the "Code") describes the standard of ethical business conduct expected from all officers, directors, and members of Arvin Sango, Inc. ("ASI") and their affiliates (collectively, the "Company" or "ASI"). The Code explains who we are, what we do, what we believe, and what we plan to accomplish. It establishes a common understanding not only for those of us who work here but for all who interact with us.

THE SANGO WAY

The SANGO WAY lays down the principles of behavior for ASI members, describing the values shared by people working in the Sango Group and what actions or behaviors are expected of Sango Group members. The SANGO WAY is the background upon which our actions and behaviors are based (the foundation referred to when making a value judgment), meaning that when various judgments are made, it is necessary to confirm that this judgment corresponds with the principles of the SANGO WAY.

The five basic pillars of the SANGO WAY are:

- Fair and Conscientious Behavior
- Cultivating Skills and Building Strong Teams/ek
- The Spirit of Challenge
- Innovation and Creativity
- GENCHI GENBUTSU (Go and See)

The Code is based on our core values. The purpose of the Code is to set forth our commitment to high ethical standards. The Code highlights the values that guide our business conduct and lists resources for help or further information.

However, it is impossible for the Code to address every possible workplace situation or list every ASI policy and procedure. Use the Code for guidance about our ethical standards, where to take your questions or concerns, and where to review relevant company policies.

When each of us follows the Code, we "walk the talk" and communicate our commitment to the values that have made ASI admired both as a business partner and as an employer. It is important to note that violations of the Code, or the policies referred to in the Code, could result in consequences such as discipline, including termination of employment or criminal prosecution or both.

USING THE CODE

- Take the time to read through the entire Code and educate yourself about policies, procedures, and laws that apply to your work.
- Think about how the Code applies to your job and consider how you might handle situations to avoid improper, illegal or unethical actions.

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ETHICAL DECISION MAKING

Ethical decision making is essential to ASI's success. Some decisions are obvious and easy to make; others are not.

When faced with a difficult situation, asking ourselves the questions below can help us to make the right ethical decisions.

1. Is this action legal?

If you think an action may be illegal, do not proceed. If you have a question as to whether an action is legal talk with any member of senior management consistent with our "open door" culture or our Vice President of Human Resources.

2. Is this action consistent with ASI's expectations, policies, and guidelines?

If the proposed action does not comply with ASI policy, you should not do it.

3. Is this action consistent with the SANGO WAY and expectations?

If the proposed action is inconsistent with the SANGO WAY and expectations, do not proceed.

4. If this action were made public, would you be comfortable?

Ask yourself if you would make the same decision if you knew that it would be reported on the front page of tomorrow's newspaper or published widely online.

OUR ROLE AND DECISION MAKING

Each of us has a responsibility to speak up.

The history of ASI includes a long-standing commitment to its stakeholders to high business and ethical standards.

All of us must obey the law at all times, wherever we are. Each country where ASI does business has its own laws, regulations and customs. Though there can be significant differences from one country to another, no matter where we work, we are all responsible for complying with all applicable laws and following our Code.

As part of our continuing commitment to ethical business practices across all of ASI's operations, we also expect our business partners, including suppliers, distributors, vendors, and contractors, to abide by the ASI Vendor Code of Business Conduct, which can be viewed on ASI's external website.

AUTHORITY

In addition to knowing and understanding this Code, each of us must understand the level of authority included in our job. We must all be careful to act within the limits of that authority.

GUIDANCE

No code or manual can provide complete answers to all questions. We must rely on our good sense of what ASI's high standards require. This includes knowing when to seek guidance on the proper course of action. When in doubt, we err on the side of full disclosure and seeking guidance. We can expect timely and specific guidance from our supervisors, managers, and human resources department.

Some of us have jobs that require more detailed knowledge of particular compliance topics than this Code provides. In this case, our managers or supervisors will direct us to the appropriate information.

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COMPLIANCE

Each of us must comply with this Code and with all ASI policies. If we fail to do so, we may face disciplinary action, including termination. Likewise, any member, supervisor, manager, officer, or director who is aware of any violation and does not promptly report and correct it may be subject to similar consequences.

REPORTING POSSIBLE VIOLATIONS

Speak up promptly if there is any reason to suspect that anyone at ASI or its affiliates has violated Company policies or applicable law, including this Code of Business Conduct and Ethics. We must also report any activity that could damage ASI's reputation. Members may speak with any member of senior management consistent with our "open door" culture or our Vice President of Human Resources. You may also report concerns anonymously using the Confidential Concern box located in the plant entrance, or you can email the Human Resources Department at ASIEthicsreport@arviasatango.com for Ethics Reports.

NON-RETRIBUTION POLICY

ASI does not tolerate any form of retaliation for reports made in good faith. Retaliation includes blatant actions, such as firing, transferring, demoting, or publicly attacking someone, as well as more subtle retaliation, such as avoiding someone, leaving him or her out of professional or social activities, and so on. Both managers and members will be held to this principle.

THE ASI CODE

The Code explains who we are, what we do, what we believe, and what we plan to accomplish. It establishes a common understanding for our members and everyone we do business with.

ASI'S INTERNAL POLICIES

Compliance with the Code is enhanced when we all understand the underlying policies and procedures that govern specific conduct. These policies are accessible in the Member Handbook and as provided by the Company with respect to particular job functions and responsibilities.

REQUEST GUIDANCE OR VOICE CONCERNS

Contact any member of senior management consistent with our "open door" culture or our Vice President of Human Resources for guidance or to voice concerns. You may also report concerns anonymously using the Confidential Concern box located at the plant entrance, or you can email the Human Resources Department at ASIEthicsreport@arviasatango.com for Ethics Reports.

OUR COMMITMENT TO OUR MEMBERS

We value and respect the unique perspective and talents of each member

ASI is committed to providing a work environment where all members are treated fairly and with respect. Our members are our most valuable resource and are essential to our success. In the course of our daily work, we use knowledge, experience, creativity, technology, and perseverance to find innovative and practical solutions to challenges that arise. Our goals would be meaningless if we did not have a high-quality workforce and continually work to develop our members.

We Promote Diversity

Diversity is important to ASI. We believe diverse companies compete more successfully in today's global economy. We promote diversity within our workforce and have an inclusive environment that helps each of us to fully participate in and contribute to ASI's success.

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- Suppliers: We encourage and expect our suppliers to treat their members in a manner that respects human rights.

Your Responsibility

We must all conduct ourselves according to ASI Values, understanding and obeying local laws, reading and acknowledging this Code, and reporting violations of ASI policies and practices.

COMPANY RECORDS AND INTERNAL CONTROLS

Our Shared Responsibility

ASI's books and records must be prepared accurately and honestly, both by our accountants and by any of us who contribute to the creation of business records. Business records include expense reports, job logs, measurements, time sheets, and other documents. All books and records must be supported by sufficient documentation to provide a complete, accurate, valid, and auditable record of each transaction.

We rely on our accounting records to produce reports for our management, shareholders, creditors, governmental agencies, and others. Accurate books and records are essential for managing ASI's business and maintaining the accuracy and integrity of our financial reporting. Both Company policy and various laws require ASI to maintain complete and accurate financial records. Any attempt to conceal or misstate information in Company records is a serious offense and may result in disciplinary action and criminal prosecution. Our individual responsibilities in this area include ensuring that all inputs we prepare, including financial reports, travel and entertainment reports, job logs, time sheets, and business records are accurate.

Each of us is responsible for reporting any suspected violations of ASI's accounting policies and procedures. In this respect, the following guidelines must be followed:

- No undisclosed or unrecorded funds or assets may be established for any purpose.
- Assets and liabilities of ASI must be recognized and stated in accordance with our standard practices and Generally Accepted Accounting Principles ("GAAP").
- No false or artificial entries may be made, or misleading reports issued.
- No false or fictitious invoices may be paid or created.

Internal Controls

All ASI members must understand the internal controls relevant to their position and follow policies and procedures related to those controls. Members are encouraged to talk to a manager or supervisor immediately if they suspect that a control does not adequately detect or prevent inaccuracy, fraud, or waste.

Audits

All of us are required to cooperate fully with internal and external audits. Audits help ensure compliance with established policies, procedures, and controls and help identify potential weaknesses so they may be remediated promptly. Always provide clear and truthful information and cooperate fully during the audit process.

Fraud

Generally, fraud is the intentional use of false representations or deception to avoid an obligation or obtain an unjust advantage. Members must not engage in any scheme to defraud anyone of money, property or honest services. ASI relies on its internal controls and the personal integrity of all its members and contractors to protect our assets against damage, theft and other unauthorized use.

AVOIDING CONFLICTS OF INTEREST

We expect everyone to act in the best interest of ASI at all time.

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We Provide Equal Opportunity

It is the policy of ASI to hire, promote, transfer, terminate, discipline, and make all other employment-related decisions without regard to race, color, religion, ancestry or national origin, veteran status, gender, age, genetic predisposition or carrier status, physical or mental disability, or any other basis prohibited by local, state or federal law. It is also the policy of ASI to apply the same principles of equal employment opportunity to qualified disabled veterans and qualified veterans of the Vietnam era.

Compensation and Tenure

ASI pays for performance. We administer wages, salaries, and benefits to maintain our competitive position in the markets in which we do business. This allows us to attract and retain top-notch personnel, provide incentives, and reward excellence in the workplace.

ASI does not guarantee specific employment for any particular period of time to any member.

Drug and Alcohol-Free Workplace

A drug-free and alcohol-free workplace is vital to the Company, to workplace safety, to the quality of our services, and to the productivity of our members. ASI is committed to providing a safe, healthy and productive work environment for all of its members and others who may be affected by its activities; to providing products which operate safely; and to ensuring the integrity and security of its facilities. See our Member Handbook for further details.

Preventing Workplace Violence and Harassment

ASI strictly prohibits actual or threatened violence against co-workers, visitors, anyone on our premises, or anyone who has contact with members in the course of their duties. See our Member Handbook for further details.

HUMAN RIGHTS

ASI is committed to respecting Human Rights.

As part of our commitment to the global community and each other, ASI upholds individual human rights. We recognize the dignity of all human beings and the inalienable rights all people have to live their lives free from social, political, and economic discrimination or abuse. We condemn human rights abuses and operate safely and in compliance with applicable laws and regulations.

What Are Human Rights?

Human rights are basic standards of treatment to which all people are entitled, regardless of race, color, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status.

Although governments are primarily responsible for ensuring the fulfillment of human rights, ASI recognizes that companies also have a responsibility to respect human rights and can serve as positive role models in the communities they operate.

Our Commitment

We conduct our global operations in a manner that respects human rights. Our policies and practices address four areas:

- **Members:** We treat our members and clients with dignity and respect and promote diversity within ASI.
- **Security:** We protect personnel and assets in a manner consistent with security protocol and our Security Access Controls.
- **Communities:** We engage with communities to further our understanding of human rights issues in order to increase the benefits of our projects and operations.

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All ASI, we respect the right of members to manage these personal affairs and investments. At the same time, we expect one another to act in the best interests of the Company. Business decisions should be made free from any conflict of interest and should also appear impartial.

Conflicts of interest may occur when a member's private activities conflict or appear to conflict with his or her responsibilities to ASI. An outside activity would be considered a conflict of interest if it:

- Negatively affects our reputation or relationship with others.
- Interferes with a member's judgment in carrying out job duties.
- Has a negative impact on our business interests.
- Members and managers, as well as their close relatives, must never:
 - Use their position or influence to secure an improper benefit for themselves or others.
 - Use ASI information, assets or resources for their personal gain or the inappropriate benefit of others.
 - Take advantage of insider information at ASI.
 - Compete against ASI.

Actions that might involve a conflict of interest, or the appearance of one, should be fully disclosed in writing to the Vice President of Human Resources and/or by emailing the Human Resources Department at ASIEthicsreport@arviasatango.com for Ethics Reports for review as soon as the conflict is known. Members who knowingly fail to disclose conflicts are subject to discipline, including dismissal. Any continued conflict of interest that has not been approved by the Vice President of Human Resources is a violation of the Code. If any one of us becomes aware of a conflict of interest at ASI, we must report it.

Outside Employment

We realize that in some circumstances a member may need to take on additional part-time work outside the Company. Outside employment for certain members may be allowed, as deemed appropriate by the member's supervisor, provided that it:

- Does not present a conflict of interest.
- Does not interfere with your employment with us.
- Is not work for a competitor.

Avoid Accepting or Giving Gifts, Fees, Favors or Other Advantages

It is a conflict of interest for an ASI member to seek or accept for themselves or others any gifts, favors or entertainment without a legitimate business purpose, or to seek or accept loans from any person or business organization that does or seeks to do business with, or is a competitor of, ASI.

Gifts and entertainment can play an important role in business relationships in some cultures, and the refusal of a gift can result in an awkward business situation. Whether a member should keep a valuable gift for personal use versus turning it over to the Company or donating it to charity should be discussed with the Vice President of Human Resources on a case by case basis.

Accounting records and supporting documentation reflecting gifts, favors, and entertainment to others must be accurately stated and include appropriate, clear, and descriptive text. Advanced approval from the Vice President of Human Resources is required before giving or accepting gifts, favors, or entertainment of unusual monetary value in excess of \$250.00 per occurrence (note that U.S. tax law limits the deduction for business gifts to \$25 per recipient per year). Approval from the Vice President of Human Resources is required before any gift or payment can be made to a government or public official.

In case of doubt as to the legality of any gift, favor or entertainment proposed to be given by or on behalf of the Company, ASI's Vice President of Human Resources should be consulted in advance. We should always err on the side of disclosing to the Vice President of Human Resources any gifts, favors, or entertainment that we are not sure about.

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ANTI-BRIBERY, INTERNATIONAL TRADE, AND ANTIBOYCOTT LAWS

ASI does not condone bribery of any kind. Bribery is always prohibited.

As part of our commitment to winning business the right way, ASI does not and will not tolerate bribery in any form. Even if we lose business or encounter delays, we will never bribe any person, public or private, either directly or indirectly (such as through a third party). We comply with all applicable international laws, treaties, and regulations that forbid bribery, including the local laws where we conduct business and the U.S. Foreign Corrupt Practices Act ("FCPA"). Members with duties that involve transactions or travel outside of the United States must familiarize themselves with the FCPA. Information regarding the FCPA rules can be obtained from the Vice President of Human Resources. To be responsible members of our business communities, we must follow these laws wherever we do business, regardless of local custom. This means we may never offer, attempt to offer, authorize, or promise any sort of bribe or kickback for the purpose of obtaining or retaining business or for an improper advantage. Moreover, we may never solicit or accept a bribe or kickback.

A "bribe" is an offer or gift of anything of value or any advantage that is intended to improperly influence the actions of the recipient or other person(s). Bribes may include money, gifts, travel or other expenses, hospitalities, below-market loans, discounts, favors, business or employment opportunities, political or charitable contributions, or any benefit or consideration, direct or indirect. A "kickback" is the return of a sum already paid or due to be paid as a reward for awarding or fostering business.

Approval from the Vice President of Human Resources is required before any gift or payment can be made to a government or public official.

ASI members, agents, and contractors are prohibited from making payments or providing anything of value to government officials with the intent to improperly influence the performance of their official duties or gain any other improper advantage. ASI requires that internal controls be in place and functioning and that accurate and complete transaction records be kept by the Company.

Facilitating Payments and the FCPA

Facilitating payments are incidental payments or gratuities to foreign officials to expedite performance of a routine governmental action, such as: obtaining permits, licenses, or other documents to do business; processing government papers such as visas or work orders; providing police protection or mail services; providing telephone services, power, or water supply; and loading and unloading cargo. The term "routine governmental action" does not include any decision of whether to award new business or to continue business. Although facilitating payments are not prohibited by the FCPA, they are prohibited by Company policy. For more information, please contact the Vice President of Human Resources.

Wherever ASI operates, we respect and comply with the local laws and regulations.

Complying with International Trade Laws

Laws that apply to Company operations outside the United States include the local laws of countries where we operate, as well as certain U.S. laws that govern international operations of U.S. companies and U.S. persons. Many countries have laws that restrict or otherwise require licensing for the export or import of certain goods and services to other countries and to certain parties. Countries may also impose various kinds of trade sanctions or embargoes against other countries or persons.

The scope of these trade sanctions or trade embargoes may vary widely from country to country. They may range from specific prohibitions on trade in a specific commodity to a total prohibition of all commercial transactions. Due to the complexities of these international trade laws, we must seek guidance from the Vice President of Human Resources before exporting or importing goods or services or engaging in transactions that might be affected by trade sanctions.

Understanding Antiboycott Laws

Some countries have adopted laws prohibiting their people and businesses from participating in or cooperating with international trade embargoes or sanctions that have been imposed by other countries. For example, anti-boycott laws in the United States penalize U.S. companies, like ASI, if they or their subsidiaries or affiliates participate or cooperate with international boycotts not supported by the United States. U.S. anti-boycott laws also require these companies to report any request to participate or cooperate in such a boycott. Any member receiving a request of this sort should inform the Vice President of Human Resources immediately.

GOVERNMENT AFFAIRS AND POLITICAL INVOLVEMENT

ASI's participation in the political arena is conducted in accordance with the highest ethical standard.

ASI regularly interacts with government officials. How we conduct ourselves with governments and in the political arena can affect our reputation, our operations around the world and our ability to work with government officials and other stakeholders.

Our activities must meet the highest ethical standards and comply with both U.S. and local laws and regulations. In all instances, it is imperative that we seek proper guidance and obtain the required approvals before engaging in government or political activities.

Engaging in Lobbying Activities

Lobbying is seeking to influence public policy decisions by providing information to elected or appointed officials and their staff. These activities include both direct communication with public officials and providing support to any person who engages in such communication. Lobbying activities are strictly regulated and all members must obtain guidance from their supervisor or manager before beginning to lobby.

Making Political Contributions

Political contributions by ASI concerning elections of any kind, whether monetary or nonmonetary (such as allowing a member to work on a campaign while on ASI time) must be approved in advance by the Vice President of Human Resources.

Engaging in Political Activities on Your Own

ASI encourages us to participate in the political and governmental process and, when permitted by a country's laws and customs, to communicate our personal views to appointed and elected officials. However, we cannot identify ourselves as representatives of ASI or any of its affiliate companies. Under no circumstances will ASI reimburse any member for making a personal contribution.

Members must seek guidance from the Vice President of Human Resources before engaging in any personal political activity during paid working hours or while using Company resources, such as e-mail, phone, and meeting rooms, since such activities may be legal or illegal political contribution by the company.

Providing Gifts to U.S. Public Officials

Under certain circumstances, ASI may provide gifts to U.S. public officials. These include elected and appointed U.S. officials at the local, state and federal levels as well as government employees such as public safety officers and public university professors. "Gifts" are typically defined as anything of value, including meals, gift certificates, travel expenses, event tickets, or honoraria. Such gifts must always be in strict compliance with federal and state law and the guidelines provided in the Code.

ASI's Political Activities

ASI may sometimes express its views publicly and with elected officials on local and national issues that affect its operations. In such cases, Company funds and resources may be used, but only when permitted by law and in accordance with our Company guidelines, including approval from the Vice President of Human Resources. It also should be noted that meetings between ASI members and government officials may constitute lobbying, thus requiring special reporting of salary and other costs which may be considered non-deductible. The Company will

provide appropriate guidelines for such reporting. The Company does not have a Political Action Committee. However, ASI may make limited contributions to candidates and selected political parties or groups in jurisdictions where it is legal and customary to do so. No member may make or commit to political contributions on behalf of the Company without the approval of the Vice President of Human Resources.

Government Contracting and the Federal Acquisition Regulation (FAR)

ASI complies with all laws that involve working with government partners.

In pursuing business with governments of various countries, the standards of conduct and prohibited practices may be different from those adhered to in commercial business. For example, in the U.S., the giving of or offering to accept business courtesies from the government is severely limited. The U.S. Department of Defense guidelines limit a supplier's entertainment expenses for governmental members to a limit of \$20 per person per occasion, with a limit of \$50 per person per year.

When ASI accepts U.S. government contracts or subcontracts, we have an obligation to the public to ensure that we administer those contracts and deliver our products and services in a manner that fully complies with federal procurement laws and regulations, as well as our own high standards. We follow all Federal Acquisition Regulation ("FAR") guidelines that govern how the federal government purchases goods and services. This applies equally to direct contracts with the government and to subcontracts in which an ASI business is providing products and services that are procured by others under contract with the federal government. These laws are often complex and impose serious civil and criminal penalties for violations of both the Company and members participating in improper practices.

Those of us who work with government contracts have a responsibility to know and follow the particular laws and regulations that apply to government contracts and to conduct business with the highest ethical standards. If there is any question, contact the Vice President of Human Resources prior to taking any action that may compromise our compliance with FAR.

ANTI TRUST/FAIR COMPETITION LAWS

ASI operates according to all applicable laws.

Antitrust laws, also known as competition laws, outside of the United States, are designed to ensure a fair and competitive free-market system. We must all help ensure that ASI's business is always in compliance with these laws. This means that we will compete based on the merits of our products and services, our prices, and our customer loyalty.

Contracts with Competitors

Some of the most serious antitrust offenses occur between competitors, such as agreements to fix prices or to divide customers, territories, or markets. We do not want to even create the appearance that we've engaged in such an agreement. Even communications that feel completely innocent, such as loose talk or information discussions, might give rise to accusations.

It is therefore important to avoid discussions with competitors regarding price, terms and conditions, costs, production plans, marketing strategy, customers, and any other confidential or proprietary information. Before exchanging any information with a competitor, it is best to get advice from the any member of senior management consistent with our "open door" culture or our Vice President of Human Resources. Antitrust laws may also apply to trade association meetings, benchmarking efforts, or strategic alliances involving competitors.

Relationships with Customers and Suppliers

There are antitrust concerns related to our relationship with our customers and suppliers that could be identified as a restraint on trade. We must all be truthful with customers and take particular care when describing the quality, features, or availability of our products and services as well as our competitor's products and services.

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include taking an assigned ASI laptop or mobile device home or being granted access to specific computer systems or information. Members unsure of their authority should discuss this subject with local management for clarification.

Handling Information and Intellectual Property

We must protect and leverage our information and intellectual property, as well as sensitive information entrusted to us by others. Such information should be shared only with other ASI members who have a legitimate business reason to know. Outside parties should have access to such information only if they have a legitimate business reason to know and are subject to a binding nondisclosure agreement.

Examples of proprietary or confidential information include:

- Company objectives and strategies
- Business, research, and product plans
- Unpublished financial or pricing information
- Formulas and processes
- Salary, benefits, and member data
- Customer data
- Supplier and raw material data

ASI members must comply with all laws, regulations, and contractual commitments regarding the valid and enforceable intellectual property rights of third parties, including patents, copyrights, trade secrets, and other proprietary information.

We must protect ASI's intellectual property as well as proprietary and confidential information. We must avoid using such information for our personal benefit or for the benefit of any entity other than ASI.

Examples of misuse of confidential or proprietary information include unauthorized viewing, distributing, copying, removing from the premises, damaging, or altering information.

Our obligation to protect ASI's informational assets continues even after we leave the Company. We are all required to return to ASI any property, documents, and materials we have in our possession upon the end of our employment.

None of us may retain copies of information assets or intellectual property.

The protection of information assets is vital to ASI's interests and success. Any member who discloses or misuses proprietary information, intellectual property, or confidential information without authorization may be subject to discipline, including termination and legal action.

Follow all ASI policies regarding company records and protecting information

Retrieving Information for Litigation Purposes

During the course of litigation, we might be instructed by our lawyers to not delete records or to provide documents or other evidence. We must comply with these instructions. We all have a duty to report suspected incidents of noncompliance and to consult with our attorneys if we have questions.

USING COMPUTER SYSTEMS AND TECHNICAL RESOURCES

We are all responsible for helping to make sure that ASI's computer systems and other technical resources are used appropriately. Security Access Controls are the methods by which ASI aims to mitigate the risks to its computers, servers, networks, data, and devices. Unauthorized use of access codes, computer systems or programs may be grounds for disciplinary action, including termination of employment. For more information, please read ASI's Computer Systems Usage General Policy and Guidelines and its referenced policies.

Using E-mail and the Internet

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Consequences of Violations

The consequences of violating antitrust or competition laws can be extremely serious for ASI and its members such as fines and imprisonment for the individuals involved. In addition to criminal prosecution, we may be subject to very costly civil suits.

Whenever you have any doubt about whether an action you are considering raises issues under these laws, you should seek advice from a member of senior management or our Vice President of Human Resources.

DATA PRIVACY

Care and discretion must be exercised when handling personal data.

Personal data is information that can identify ASI members, contractors, directors, unitholders, clients, and anyone else we do business with. Personal data is an important asset and should be handled in a way that promotes trust. We must follow ASI policies and laws that govern how we collect, use, and dispose of personal data. While the policies reflect the general requirements of privacy laws around the world, remember that where privacy laws are stricter, ASI must also comply with those laws.

Proper Use of Personal Data

If your job responsibilities include handling personal data, you must take the necessary steps to protect it. Personal data should be collected only if there is a legitimate business reason to do so. You should collect and use only the personal data needed for the task at hand. Do not share personal data with anyone, including your coworkers, unless they have a business need to know it and you have the authority to do so. Protecting the personal data of our customers, suppliers, and coworkers increases the trusting and beneficial relationships we enjoy with our stakeholders.

PROTECTION OF INFORMATION AND INTELLECTUAL PROPERTY

We all have a responsibility to protect our information assets.

Our creativity and innovative ideas make significant contributions to ASI's success in the marketplace. ASI's ideas, innovations, and information are ASI's intellectual property and are valuable information assets. Company information includes ASI paper and electronic records as well as the systems that store, process, or transmit the information. Company intellectual property includes copyrights, patents, trade secrets, and trademarks.

Ownership

Information assets you create on behalf of the Company, or that relate to our business, belong to ASI as noted here and as stated in the Employee's Covenant. ASI must identify and protect our information assets to avoid losing our intellectual property rights and inherent competitive advantages.

We must honor our employment agreements and Employee Covenant and provide ASI with rights to any intellectual property, inventions, and other proprietary information we develop while working at ASI. Each of us must promptly disclose all inventions, developments, concepts, ideas, or other intellectual property we create or conceive, which are in the scope of our employment or related to ASI's business in any way.

Upon disclosure, ASI has a right to protect this intellectual property, and any unauthorized use of these information assets, either personally, or by assignment, disclosure, or sale to a third party, is a violation of the Code.

Access Control

ASI policies safeguard our information assets from theft, unauthorized disclosure, misuse, trespass, or careless handling. At times, ASI members may be authorized to view and handle particular information assets. Examples

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We must all ensure that computer and telecommunication systems are used only for ASI business. Access to either extranets or the Public Internet must always be achieved in a consistent and secure manner and should never expose ASI computing resources and information to unnecessary risk. We should not assume that any use of ASI's communications devices or systems is private. ASI, subject to applicable laws and regulations, reserves the right to monitor and disclose all ASI Network traffic, data transmitted and/or received, and websites accessed using ASI IT systems.

CLOSING NOTE

ASI's legal and ethical obligations go far beyond what is included in this Code of Business Conduct and Ethics. We must all work to ensure prompt and consistent action against violations of this Code and comply with the many laws that affect our business. However, in some situations it is difficult to know right from wrong. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. If questions arise about any matter of compliance or ethics, whether covered by this Code or not, speak with any member of senior management consistent with our "open door" culture or our Vice President of Human Resources. You may also report concerns anonymously using the Confidential Concern box located at the plant entrance, or you can email the Human Resources Department at ASIethicsreport@arvinstango.com for Ethics Reports. These are questions to keep in mind when analyzing a potential ethics or compliance problem:

- Do I have all the facts?
- What is my role and responsibility?
- What specifically am I being asked to do?
- Have I explored available Company resources such as reading Company policy, speaking to a member of senior management, or contacting the Vice President of Human Resources?

The responsibility for meeting our legal and ethical obligations cannot, however, be fully defined or guaranteed by any set of written rules. These will almost certainly be times when the best course of action can only be recognized by ensuring our actions are consistent with ASI values.

Our confidence must rest, as it always has, on the honesty, integrity and good sense within each of us.

ACKNOWLEDGMENT

This is to acknowledge my receipt of the Company's Code of Business Conduct and Ethics. I hereby certify that I have read the policy and agree to abide by the Code of Business Conduct and Ethics. I understand that adherence to the Code is a condition of continued employment and that I must report actual or suspected violations of the Code.

Date: _____ Member: _____

Date: _____ Witness: _____

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ASCI Membership Policy



*Policy Number: 700-023
Location: London, Ontario, Canada
Issue Date: August 2012
Revision Date: March 2021*

MEMBERSHIP POLICY

Purpose

To establish guidelines for the recruitment and hiring the most suitably qualified candidates for membership at Arvin Sango Canada, Inc. (ASCI).

Scope

This policy applies to all positions within ASCI.

Responsibility

It is the responsibility of Human Resource and management to ensure that the provisions of this policy are understood by all members and applied appropriately.

Policy

All employment selection activity will be performed in strict accordance with all applicable employment laws.

Applicants must be eighteen (18) years of age and have a High School diploma (or equivalent) to be considered for membership at ASCI.

Managers in need of additional salary members must complete a New Member Requisition Form which must be approved before the recruiting and selection process can begin.

ASCI will accept resumes from a variety of sources including internal candidates, member referrals, direct submission, professional placement firms, college, and university placement offices and those solicited through advertising.

Inaccurate and/or incomplete applications will not be considered for the selection process.

The selection process may involve application review, skills testing, reference checks, interviews, criminal background check, and any additional processes deemed necessary or helpful.

Applicants must be willing to participate in and successfully complete all phases of the selection process to be considered for membership.

Human Resources will direct the hiring process and will issue all offers of employment. Managers and Supervisors will assist in the selection process.

Human Resources will maintain all records of interviews conducted and offers extended and responses received and will maintain resumes and applications received for a period of three (3) years.

Applications and resumes received within the most recent six (6) month period will be considered "active".

Unsolicited applications and resumes will not be kept on file.

Reference

- New Member Requisition Form 003-01a
- 700-030 Criminal Background Policy
- 700-020 Internal Posting Promotion

Revision Record

Date	Revision Change
03/31/21	General review to address wording, grammar, spelling & punctuation. Added reference to Policy 700-030 and 700-020. Added where ASCI will select candidates. Policy Number 700-024 Membership Policy – Salary, has been amalgamated with Policy 700-023 Membership Policy – Hourly, to create this policy for all member 700-023 Membership Policy.

3-c None identified

3-d N/A

3-e N/A

3-f All applicable members receive training related to supply chain in new hire orientation

3-f ASI/ASCI Through supplier visits and communication from Sango and Toyota of any concerns

4. Approval of the report

The report has been reviewed by Arvin Sango, Inc. Company Officers



Scott Hubbard
Executive Vice President



Jon Bivens
Vice President