

Supplier Code of Conduct

Linamar's Supplier Code of Conduct outlines key principles for social responsibility, environmental responsibility and corporate governance. These principles align with relevant laws and international standards for both Linamar and its Suppliers, including but not limited to the UN Guiding Principles on Business and Human Rights, the United Nations Global Compact and the OECD Guidelines for Multinational Enterprises. These principles are also consistent with the policies Linamar complies with as outlined in our Global Operating System (GOS).

Linamar expects all Suppliers to adhere to the standards outlined in this Supplier Code of Conduct and encourages Suppliers to uphold these same principles in their own supply chain. Linamar believes this Code of Conduct will support the development of a responsible and resilient supply chain and foster strong business relationships.

Business Ethics

Anti-Corruption, Anti-Bribery & Anti-Money Laundering: Suppliers are expected to comply with all applicable laws and prohibit all forms of corruption, bribery and fraud (including money laundering).

Data Protection, Data Security & Intellectual Property: Suppliers are expected to comply with all applicable data protection and security laws and ensure the protection of intellectual property rights as well as the privacy of all employees and stakeholders.

Responsible Disclosure of Information: Suppliers are expected to ensure the reporting of all financial and other business information is accurate.

Conflicts of Interest: Suppliers are expected to avoid and disclose any conflicts of interests.

Counterfeit Parts: Suppliers are expected to take reasonable measures to minimize the risk of introducing counterfeit parts.

Responsible Trade: Suppliers are expected to comply with all applicable laws related to antitrust, competition, export controls and trade restrictions.

Grievance Mechanism & Non-Retaliation: Suppliers are expected to establish and maintain an effective grievance mechanism for stakeholders to report concerns without fear of retaliation.

Human Rights and Working Conditions

Human Rights Management: Suppliers are expected to establish and maintain policies and procedures related to basic working conditions and human rights that meet or exceed all applicable employment, labour and human rights laws, regulations and international standards. Suppliers are expected to take appropriate measures to ensure that private or public security personnel engaged on their behalf interact with stakeholders in a manner that respects and protects human rights.

Ethical and Inclusive Work Environments and Recruiting Processes: Suppliers are expected to ensure that their workplace and recruiting processes uphold the highest ethical standards, fostering an environment of inclusion, equal opportunity, and mutual respect. Suppliers must strictly prohibit any form of discrimination, violence and harassment, and ensure workers are provided with clear contractual agreements and freedom of movement.

Wages, Benefits & Working Hours: Suppliers are expected to ensure wages, benefits and working hours comply with local legal requirements.

Freedom of Association and Collective Bargaining: Suppliers are expected to respect workers' rights to associate and bargain collectively.

Child Labour, Forced Labour & Human Trafficking: Suppliers must prohibit child labour, forced labour and human trafficking within their own operations and their supply chain.

Rights of Indigenous Peoples & Local Communities: Suppliers are expected to respect the rights of local communities and indigenous peoples (which shall include land rights), ensuring free, prior and informed consent.

Health and Safety

Health and Safety Management: Suppliers must meet or exceed all applicable health and safety laws and regulations. They are expected to maintain health and safety policies and procedures conformant with ISO 45001, which shall include ensuring a safe work environment, ensuring the availability of PPE, providing adequate training, ensuring emergency preparedness, conducting risk assessments, maintaining an incident management program, ensuring contractor safety and working towards continuous improvement.

Environment

Environmental Management Systems: Suppliers are expected to meet or exceed all applicable environmental laws and regulations and maintain environmental policies and procedures conformant with ISO 14001.

Environmental Stewardship: Suppliers are expected to (a) minimize the use of resources including energy, water and raw materials by committing to responsible environmental practices such as energy efficiency, reuse and recycling, (b) manage releases to land, water and air (including noise) according to applicable regulatory requirements and (c) monitor and continuously work towards minimizing environmental impacts, such as those associated with emissions and waste.

Biodiversity, Land Use and Deforestation: Suppliers are encouraged to take reasonable measures to protect natural ecosystems from the impacts of their operations, as well as any construction or development.

Decarbonization: In order to align with Linamar's long term carbon neutral goals, Suppliers are expected to develop internal plans for decarbonization by 2050 or earlier. Suppliers are encouraged to track emissions and actively work towards decarbonizing their value chain in line with their commitment. Upon request, Suppliers are expected to share their strategies and relevant carbon emissions data with Linamar.

Responsible Chemical Management: Suppliers are expected to comply with all applicable regulatory requirements pertaining to hazardous substances, follow the hierarchy of controls and ensure there are practices in place to safely and responsibly handle, store, transport and dispose of hazardous materials.

Responsible Supply Chain Management

Suppliers must establish a responsible sourcing process which ensures compliance with environmental, social and governance laws and standards throughout the supply chain. This process must include prohibiting the use of Conflict Minerals as required by applicable laws such as the Dodd-Frank Act and SEC Regulations. Suppliers must ensure that the materials they purchase and supply to Linamar are comprised of "DRC conflict-free" minerals in accordance with the Responsible Minerals Initiative (www.responsiblemineralsinitiative.org). Suppliers must also ensure that the materials they purchase and supply to Linamar comply with applicable legislative requirements of the United Kingdom and European Union including but not limited to the REACH Regulation and WEEE Directive. Suppliers must reply promptly to Linamar's information requests pertaining to these requirements.

Monitoring and Compliance

Risk Management: Suppliers are expected to monitor and control business risks and ensure regulatory compliance.

Reporting Concerns & Remediation: Suppliers are expected to report any violations of this Code of Conduct or applicable laws to Linamar. Suppliers are encouraged to report concerns directly to their designated Linamar contact. Alternatively, anonymous reports can be made through EthicsPoint [linamar.ethicspoint.com]. Suppliers are expected to take remedial actions to address any violations and implement corrective actions to prevent reoccurrences.

Auditing: Upon request, Suppliers shall promptly provide any necessary documentation, records, or other pertinent information that Linamar may require to verify the Supplier's compliance with this Code of Conduct.