Nexteer Automotive

Forced Labor Policy

Nexteer supports the elimination of all forms of forced or compulsory labor, in compliance with the Organization for Economic Co-Operation and Development Guidelines. Forced or compulsory labor, as defined by the international Labor Organization Convention regarding forced labor, is work or service which is exacted from a person under the threat of penalty and for which that person has not offered them self voluntarily. Nexteer prohibits the use of forced or compulsory labor, as defined above, including prison, indentured, bonded or otherwise, in any Nexteer operation.

- Nexteer shall not use forced labor-prison, indentured, bonded or otherwise.

From time to time, certain prison systems worldwide may solicit Nexteer participation in voluntary prisoner training, rehabilitation, and/or skills enhancement efforts. Programs of this type that meet certain specified criteria, set forth below, do not constitute forced or compulsory labor, and Nexteer participation under those circumstances would not violate this policy. In order to assure that inadvertent violations of this policy do not occur, Nexteer participation in any program of this type must be approved in advance by both the President and the Vice President of Global Supply Management, or their designees. Approval is contingent upon meeting all the following requirements.

1. All work must be performed on a voluntary basis.

2. Working conditions must comply with applicable laws, including occupational, health, and safety laws.

3. Workers must be paid at a rate comparable to similar prison programs or operations, with reasonable administrative fees payable to the prison system or appropriate entity.

4. The Nexteer location participating in the program is responsible for monitoring compliance with these criteria on an annual basis, with findings reported to the Vice President of Global Supply Management.

Any questions regarding this policy should be directed to the Vice President of Global Supply Management.