Supplier Code of Conduct

Our commitment to doing things the right way has helped Visteon become the leading automotive technology company in our category. Our Supplier Code of Conduct reflects our values and culture, and establishes standards for doing good business. Our supplier partners and their contributors must also abide by these principles and operate with the same assurance to high standards. Our Supplier Code of Conduct includes:

- **A commitment to ethics and integrity** – Fair, honest and responsible behavior related to financial reporting, material sourcing, intellectual property and conflicts of interest including compliance with all applicable laws.

- **Human rights and working conditions** – Treating employees and suppliers with integrity and respect, providing a safe work environment and adhering to all applicable laws.

- **Environment and sustainability** – Proactively protecting the environment, conserving natural resources, and reducing the overall environmental impact of operations.

We believe these behaviors will lead to business success for all, while providing a safe, ethical and environmentally clean world in which to live and work.
Visteon is committed to maintaining the highest level of ethics and integrity, and we expect the same level of excellence from our suppliers.
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<tr>
<th>Ethics and Integrity</th>
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<tr>
<td><strong>Responsible Sourcing of Materials</strong></td>
<td>Suppliers shall demonstrate and document that raw materials used in their products are responsibly sourced.</td>
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<td><strong>Anti-Corruption</strong></td>
<td>Suppliers will work against corruption in all its forms, including extortion and bribery. Suppliers will maintain a zero-tolerance policy.</td>
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<td><strong>Privacy</strong></td>
<td>Suppliers shall implement appropriate measures to respect privacy, to protect personal data against loss and unauthorized access or use, and to comply with relevant privacy and information security laws and regulations.</td>
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<td><strong>Financial Responsibility / Accurate Records</strong></td>
<td>All business dealings will be transparently performed and accurately reflected on the company’s financial reports and filings.</td>
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<td><strong>Disclosure of Information</strong></td>
<td>Suppliers will disclose financial and non-financial information in accordance with applicable regulations and prevailing industry practices.</td>
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<td><strong>Fair Competition/Anti-Trust</strong></td>
<td>Suppliers will uphold standards of fair business and conduct themselves in accordance with all applicable anti-trust or anti-competition laws and regulations.</td>
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<td><strong>Conflicts of Interest</strong></td>
<td>Business dealings will be conducted in a manner that avoids any appearance of impropriety.</td>
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<td><strong>Counterfeit Parts</strong></td>
<td>Suppliers are required to minimize the risk of introducing counterfeit and/or diverted parts and materials into their products.</td>
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<td><strong>Intellectual Property</strong></td>
<td>Suppliers shall respect valid intellectual property rights and use commercially reasonable practices to protect the transfer of confidential technology and know-how.</td>
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<td><strong>Export Controls and Economic Sanctions</strong></td>
<td>Suppliers will comply with applicable restrictions on the export or re-export of goods, software, services and technology, as well as with applicable restrictions on trade involving certain countries, regions, companies or entities and individuals.</td>
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<tr>
<td><strong>Protection of Identity and Non-Retaliation</strong></td>
<td>Suppliers shall establish processes that allow concerns to be raised anonymously with confidentiality and without retaliation.</td>
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Visteon is committed to creating an environment where all employees and suppliers are treated with integrity and respect, and where differences are highly valued. All suppliers agree to observe international conventions aimed at promoting and protecting human rights including the Universal Declaration of Human Rights.
Human Rights and Working Conditions

Child Labor
Suppliers will not use child labor. The age of employment for young workers must meet or exceed company guidelines, legal regulations and local labor laws.

Wages and Benefits
Suppliers will provide compensation and benefits that comply with applicable local laws, including those relating to minimum wages, overtime compensation, and legally mandated benefits.

Working Hours
Suppliers shall comply with local law regarding working hours, including overtime.

Forced Labor
Suppliers will not use forced, bonded or compulsory labor, including human trafficking in any form.

Freedom of Association
Workers should be allowed to communicate openly with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment. Supplier employee should have rights to associate freely, to join or not join labor unions, bargain collectively, seek representation, and join workers’ councils in accordance with local law.

Health and Safety
Suppliers will provide workers a safe and healthy working environment that meets or exceeds applicable local laws and industry standards for safety and occupational health.

Harassment
Suppliers should provide their workers a workplace environment free of harassment in any form.

Non-Discrimination
Discrimination will not be tolerated in respect of employment and occupation. Suppliers will provide equal employment opportunities regardless of worker or applicant characteristics such as race, color, age, gender, sexual orientation, gender identity, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union association, covered veteran status, genetic information or marital status.
Environment and Sustainability

Energy Consumption and Greenhouse Gas Emissions
Suppliers will implement a comprehensive energy reduction strategy that includes increasing their use of renewable energy to support Visteon’s objective to reduce greenhouse gas and emissions through the entire supply chain. Suppliers will provide their scope 1 and 2 emissions reporting data, as requested.

Water Quality and Consumption
Suppliers will establish a program and systems that reduce, reuse, and recycle water with responsible treatment of wastewater discharges to protect the environment and improve overall water quality. Suppliers will provide water usage data upon request.

Air Quality
Suppliers will maintain emissions at regulatory compliance levels and routinely monitor, appropriately control, minimize, and to the extent possible, eliminate emissions contributing to local air pollution.

Natural Resources Management and Waste Reduction
Suppliers will support the use of sustainable, renewable natural resources while reducing waste and increasing reuse and recycling.

Responsible Chemical Management
Suppliers will identify, minimize or eliminate the use of restricted substances in manufacturing processes and finished products to ensure regulatory compliance. Suppliers should also be aware of, and communicate to Visteon, any use of reportable substances in processes and finished products, and actively investigate suitable substitutes.

Visteon suppliers are expected to support and share their approach to protect the environment, conserve natural resources and reduce the impact of their production, products and services throughout the entire life-cycle.
Reporting Mechanism for Suspected or Known Violations

Visteon suppliers will be requested to review and annually provide certification of their compliance with this Supplier Code of Conduct.

Visteon reserves the right to audit a supplier’s premises to confirm compliance with this Supplier Code of Conduct. Reports of violations or suspected violations of this Supplier Code of Conduct can be made anonymously by calling 1-855-266-7041 or via www.visteon.ethicspoint.com.

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