



SUPPLIER CODE OF CONDUCT



OVERVIEW

Our commitment to doing things the right way has helped Visteon become the leading automotive technology company in our category. Our Supplier Code defines the minimum environmental, social, and governance requirements for all supplier partners to Visteon. Our requirements include:

- A commitment to ethics and integrity – Suppliers are required to uphold the highest standards of ethics, integrity and legal compliance in all business dealings. Compliance with the law and conducting business in a fair, ethical and secure manner is essential to building trust with our customers, business partners, and the communities where we work and live.
- A respect for human rights – Suppliers are required to treat all people with respect and dignity and meet or exceed internationally recognized human rights standards. This includes safe and healthy working conditions for employees and respect for the rights of all external stakeholders, especially marginalized and vulnerable groups in the local communities where the Supplier operates and throughout their supply chains.
- A pledge of sustainability and to continuously improve the environment – Suppliers are required to fully support the transition to a low carbon footprint and continued reduction of greenhouse gas emissions. Additionally, Suppliers are required to continually evaluate their usage and consumption of all natural resources throughout the entire life cycle and conduct responsible supply chain management.

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.

GENERAL GUIDANCE

Suppliers shall comply with all applicable laws and this Supplier Code of Conduct. In the event there is a gap between the applicable law and Supplier Code, the stricter requirement offering the greatest protection shall apply. In the event there is a direct contradiction between the applicable law and the Supplier Code, the law shall apply, but the Supplier shall honor the spirit of the Supplier Code.

Suppliers shall have a formal and appropriate management system to oversee its full compliance with the Supplier Code, including a written policy commitment from its management.

Suppliers shall have a due diligence process to identify and mitigate risks for all areas of the Supplier Code. Due diligence processes shall align with internationally recognized standards and be prepared to report information related to all areas of the Supplier Code in industry formats, or Visteon directed formats, as needed.

Suppliers shall support Visteon's goals for continuous improvement in all areas of the Supplier Code.

Suppliers shall implement this Supplier Code throughout their organization, cascade to their direct suppliers, and require their direct suppliers to implement the requirements set forth in this Supplier Code and ensure cooperation from its supply chain.

ETHICS & INTEGRITY

Visteon is committed to maintaining the highest level of ethics and integrity, and we expect our suppliers to uphold these standards while operating honestly and equitably throughout their business operations and relationships.

Responsible Sourcing

Suppliers are required to exercise due diligence following the OECD Due Diligence Guidelines for Responsible Supply Chains from Conflict-Affected and High-Risk Areas. Specialized attention shall be focused on the required due diligence and reporting for Tin, Tantalum, Tungsten, Gold, Cobalt and Mica, as well as other materials as required by Visteon's customers or changing legislative requirements. Data shall be reported in the requested format, which includes the RMI Conflict Minerals Reporting Template, Cobalt Reporting Template, and other formats as released by the RMI or Visteon's customers. Suppliers are prohibited from procuring minerals or materials that contribute to or finance armed conflict, human rights abuses or violations. All reasonable efforts shall be used to procure materials from smelters and refiners who have been through third-party audit programs. Suppliers shall also ensure that the materials used in its products support biodiversity and are protective of the environment, ecosystems, land, soil quality, habitats and protect the rights of indigenous people where they are extracted or manufactured, and in no way contribute to illegal deforestation.

Financial Responsibility and Accurate Records

Visteon requires business partners who have a strong reputation of honesty and integrity. Suppliers shall conduct business transparently and are required to keep accurate records related to all business dealings, financial reports, and filings.

Anti-Bribery/Anti-Corruption

Suppliers are required to actively work against and have a zero-tolerance policy for corruption, in all forms, including but not limited to bribery and extortion. Suppliers shall not engage in any form of bribery or corruption and will not offer, promise, give, authorize or receive the payment of anything of value, directly or indirectly, to anyone for the purpose of influencing, obtaining, retaining, or giving an improper business advantage.

Data Privacy, Information and Cyber Security

Suppliers entrusted with personal data or information shall safeguard it from misuse, in compliance with all applicable data privacy laws. Appropriate steps shall be taken to protect the confidentiality, integrity and availability of this data, including implementing the best practices of an information security management system such as NIST, ISO 27001, SOC2, TISAX, or an equivalent standard. Suppliers shall also implement security controls and monitoring systems to protect and respond to security incidents and have a process to manage emerging and evolving cyber security risks. Suppliers shall minimize the risk of incidents that affect the products and services provided to Visteon and will notify Visteon within 24 hours of any incident suspected of impacting Visteon. Suppliers agree to communicate and work cooperatively with Visteon to mitigate the impact of any incident.

ETHICS & INTEGRITY

Disclosure of Information

Suppliers shall make full, fair, accurate, timely, and understandable disclosures in all public reports, filings, or relevant business to business requests made by Visteon. Information regarding financial and non-financial information shall be disclosed in the requested format, in accordance with applicable regulations, industry practices or Visteon customer requests.

Fair Competition/Anti-Trust

Suppliers shall comply with applicable anti-trust and anti-competition laws and regulations and will not discuss or enter any anti-competitive agreements, price fixing arrangements, market sharing or customer allocation agreements or engage in any other practice that may restrict competition at any level of the supply chain.

Conflicts of Interest

Suppliers shall conduct business in a transparent manner that avoids any appearance of impropriety. This includes disclosing any known situation where an employee of Visteon has a personal interest or economic tie with the Supplier's business. Similarly, suppliers shall disclose ownership or other financial interest held in the supplier by a government official.

Grievance Mechanism, Protection of Identity and Non-Retaliation

Suppliers shall implement and make available for all employees and third parties an anonymous grievance mechanism to raise concerns related to its own code of conduct, operations or supply chain, as well as ideas for improvement. Suppliers shall adopt a non-retaliation policy in connection with its grievance mechanism.

Intellectual Property

Suppliers shall respect the intellectual property rights of Visteon and any third party by safeguarding all confidential information and work products from misuse, mishandling, theft or other improper disclosure.

Export Control and Economic Sanctions

Suppliers shall 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, entities and individuals. This includes, but is not limited to, the sanctions and export control laws of the United States, the European Union, and the specific jurisdictions where business is conducted. Suppliers shall respond in a timely manner to requests for information related to its business dealings or transactions, and its corporate ownership structure.

Known Quality Problems and Counterfeit Parts

Suppliers who identify any quality problem with parts supplied by them to Visteon shall inform their buyer or quality engineer immediately and work cooperatively to resolve. Further, suppliers shall have appropriate controls in place to prevent the introduction of counterfeit and/or diverted parts and materials into their products or products sold to Visteon. If a supplier suspects that these parts or materials have been included in products sold to Visteon, it shall notify Visteon immediately.

Noise Emissions

Suppliers shall monitor and work to minimize the level of industrial noise pollution.

HUMAN RIGHTS & WORKING CONDITIONS

Visteon is committed to creating an environment where all employees and suppliers are treated with dignity and respect. All suppliers must observe international conventions aimed at promoting and protecting human rights included in the Universal Declaration of Human Rights.

Forced Labor

The use of forced, bonded, or compulsory labor, including human trafficking, in any form, at any place in the supply chain will not be tolerated by Visteon. Suppliers, their third-party recruiting agencies or service providers, and their sub-suppliers shall not tolerate or engage in restrictions of movement, involuntary transfer, excessive recruitment fees, confiscation of identity documents or passports, withholding of wages, unsafe or abusive working conditions, debt bondage, violence or any kind of exploitation, regardless of geographic region or local labor practices.

Child Labor

The use of child labor, at any place in the supply chain, will not be tolerated by Visteon. Suppliers shall prevent all forms of child labor, and support childrens' right to education. Suppliers shall implement and follow the recommendations of the OECD Guidelines for Multinational Enterprises.

Wages and Benefits

Suppliers will provide wages and benefits that, at a minimum, comply with applicable laws and collective bargaining agreements. Supplier shall provide employees with information about their employment terms and conditions via a written contract or handbook and will provide regular wage statements. Wage deductions are only allowed under applicable laws or collective bargaining agreements.

Working Hours

Suppliers will comply with applicable laws and bargaining agreements regarding working hours, resting periods, overtime, leaves of absence. Overtime work shall be on a voluntary basis and minimize strains on employees' physical and mental health.

Harassment

Supplier shall not tolerate physical or psychological punishment or abuse of any kind, including any type of sexual harassment or intimidation of any employee.

HUMAN RIGHTS & WORKING CONDITIONS

Health and Safety

Suppliers will ensure that employee exposure physical safety hazards, including machines, equipment, chemicals, substances or other physical agents are identified and controlled through proper safety procedures. Safety information shall be made available to everyone to educate and protect employees from workplace safety hazards. Additionally, employees shall have access to a safe and adequate working conditions that include free and safe drinking water, hygienic toilets, and proper lighting, ventilation, and protective equipment, if applicable.

Freedom of Association

Supplier shall allow workers to communicate openly with management regarding working conditions and management practices without fear of reprisal, intimidation, or harassment. Supplier employees should have rights to associate freely, to join or not join unions, bargain collectively, seek representation, and join workers' councils in accordance with local law. Where local law restricts the right to collective bargaining and freedom of association, suppliers shall allow alternative forms of worker representation, association and bargaining.

Non-Discrimination

Supplier will treat everyone with dignity and respect and shall not tolerate discrimination in any form with respect employment or 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, and will respect the rights of indigenous people.

Land Grabs, Land Rights and use of Security Forces

Suppliers shall not engage in illegal acquisition of property used to supply parts to Visteon. Suppliers shall seek to avoid deprivation of land, forests and waters related to parts supplied to Visteon. Further, suppliers shall not use public or private security forces to provide parts to Visteon if the deployment of security forces is intended to illegally violate human rights.

ENVIRONMENT & SUSTAINABILITY

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.

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 (GHG) emissions through its entire supply chain. Suppliers shall immediately implement the following:

1. Commit and demonstrate reasonable efforts to achieve 100% renewable energy in their business and supply chain.
2. Publicly disclose GHG targets (scopes 1, 2 and 3) which are recognized by initiatives such as the Science Based Targets initiative (SBTi) and aligned with the goals of the Paris Agreement.
3. Annually Provide GHG emissions data associated with Visteon's business and participate in the CDP Supply Chain Program or other data collection mechanism used by Visteon upon request.

Water Quality and Consumption

Suppliers shall monitor, track and document its water consumption to identify opportunities to minimize water consumption. Suppliers shall reuse and recycle water and shall treat all wastewater discharges from its operations to a minimum level, in accordance with applicable local legal requirements, and always to a level that protects the environment. Water usage data shall be provided to Visteon upon request.

Air Quality

Suppliers shall maintain the air emissions of its operations at a level that meet or exceed regulatory standards. Emissions shall be monitored to control, minimize and, to the extent possible, eliminate emissions contributing to air pollution.

Animal Welfare

Suppliers shall respect the five animal freedoms formalized by the World Organization for Animal Health (OIE) for parts supplied to Visteon. No animal should be raised for the exclusive purpose of being used in a part supplied to Visteon.

ENVIRONMENT & SUSTAINABILITY

Responsible Chemical Management

Suppliers shall disclose all materials, minerals and substances contained in their products delivered to Visteon, including production, service and spare parts in the International Material Data System (IMDS).

All materials, minerals and substances contained in products delivered to Visteon shall be compliant with the Global Automotive Declarable Substance List (GADSL), all relevant chemical legislation, and any applicable OEM standards, as well as the most current IMDS

Recommendations. Supplier shall have processes in place to monitor changes in legislation that may impact their products supplied to Visteon, and notify Visteon of its intention to change materials, minerals or substances to maintain compliance.

Supplier will submit updated reports reflecting these changes into IMDS.

Suppliers are required to ensure the registration of any critical chemicals or substances, as required, under various chemical and substance legislation.

Natural Resources Management and Waste Reduction

Suppliers shall continuously make efforts to move toward circular business models for all products delivered to Visteon, including packaging, seeking opportunities for improvement and minimized waste.

Suppliers shall monitor, track and optimize the composition of their disposable packaging material, utilizing non-complex materials or recyclable materials, as deemed appropriate for the type of product or material being transported.

REPORTING CONCERNS

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 declarations, data or 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 visteon.ethicspoint.com.



SUPPLIER CERTIFICATION

Certification Statement:

The undersigned confirms that it has received the Visteon Supplier Code of Conduct, and that my company (including its subsidiaries and affiliates) has adopted a Code of Conduct that complies with all the requirements contained within Visteon's Supplier Code of Conduct.

Further, my company will ensure that each of our suppliers will comply with the requirements set forth in our Code of Conduct, including the obligation to enforce these requirements with their suppliers.

To demonstrate this compliance, my company shall:

- 1) accurately and honestly report facts and data; and
 - 2) ensure appropriate contractual wording with its suppliers; and
 - 3) implement all necessary standards, policies, data collection and governance to meet the requirements of its Code of Conduct, in alignment Visteon's Supplier Code of Conduct.
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Suppliers shall be required to provide certification to the above statement at regular intervals, as deemed necessary by legislative requirements, Visteon, or its customers.

Visteon®