



CODE OF BASIC HUMAN RIGHTS AND WORKING CONDITIONS

Visteon is committed to creating and maintaining an environment in which all employees are treated with integrity and respect, and differences are highly valued. By creating a corporate culture in which harassment or discriminatory treatment of any form is not tolerated, we can give every employee the opportunity to contribute fully to the business success of Visteon. We respect international conventions aimed at promoting and protecting human rights including the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. This code of conduct supports our commitment to diversity, equality, and the recognition and protection of fundamental human rights in the workplace.

Child Labor

We will not use child labor and follow the recommendations of the OECD Guidelines for Multinational Enterprises. In no event will we employ any person below the age of 15, unless it is part of a government-authorized job training or apprenticeship program that would be clearly beneficial to the persons participating.

Compensation

We will promote our employees' material well-being by providing compensation and benefits that are competitive, fair and comply with applicable law. We employ business practices that support the right to a living wage.

Forced Labor

We will not use forced labor, regardless of its form, including human trafficking. We will not tolerate physically abusive disciplinary practices and will not use public or private security forces if such deployment could violate others' human rights.

Freedom of Association and Collective Bargaining

We recognize and respect our employees' right to associate freely and bargain collectively. We will work constructively with recognized representatives to promote the interests of our employees. In all locations, whether represented by unions or not, we will seek to provide opportunities for employee concerns to be heard.

Harassment and Discrimination

We will not tolerate harassment or discrimination on the basis of 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.

Environment, Health and Safety

We will provide and maintain for all employees a safe and healthy working environment that meets or exceeds applicable standards for occupational safety and health, and our operations will accomplish their functions in a manner that provides for protection of the world's environmental resource base. Visteon supports the basic human right for access to clean fresh water and sanitation where it has control and engages with its value chain partners on water-related issues.

Work Hours

We 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.

Responsibility and Implementation

The Board of Directors will have oversight and receive periodic reports from the Chief Legal Officer regarding compliance with this Code. We will provide training and make this Code of Basic Human Rights and Working Conditions available to all employees. As appropriate under local practice, we will seek the support and assistance of unions and employee representatives in this effort. We will require that our business partners throughout our supply chain also adopt and enforce similar workplace codes of conduct. We will seek to identify and utilize business partners who aspire in the conduct of their business to standards that are consistent with this Code. Reports of violations or suspected violations of this code of conduct can be made anonymously by calling 1-855-266-7041 or via www.visteon.ethicspoint.com. No negative action will be taken against any employee for providing information in good faith.