



# Supplier Code of Conduct

Initial Release - February 2026

*Integrity in Collaboration: Building a Better Future Together*

**At Adient, we hold our suppliers to the highest standards of integrity, sustainability, and excellence. We believe that integrity, transparency, and ethical practices are fundamental to building trust and fostering long-term partnerships. By upholding the highest standards of business ethics, we ensure sustainable growth and create value for our customers, suppliers, and communities.**

**Our Supplier Code of Conduct is not just a guideline, but a commitment to ethical practices, innovation, and mutual growth. Together, we can drive positive change and achieve unparalleled success.**

## Contents

<b>1. Introduction.....</b>	<b>2</b>
<b>2. Scope.....</b>	<b>2</b>
<b>3. Business Ethics.....</b>	<b>3</b>
<b>4. Human Rights and Labor Practices.....</b>	<b>4</b>
<b>5. Health and Safety.....</b>	<b>4</b>
<b>6. Environmental Responsibility.....</b>	<b>5</b>
<b>7. Responsible Sourcing.....</b>	<b>5</b>
<b>8. Compliance and Monitoring.....</b>	<b>6</b>
<b>9. Continuous Improvement.....</b>	<b>6</b>
<b>10. Enforcement.....</b>	<b>6</b>

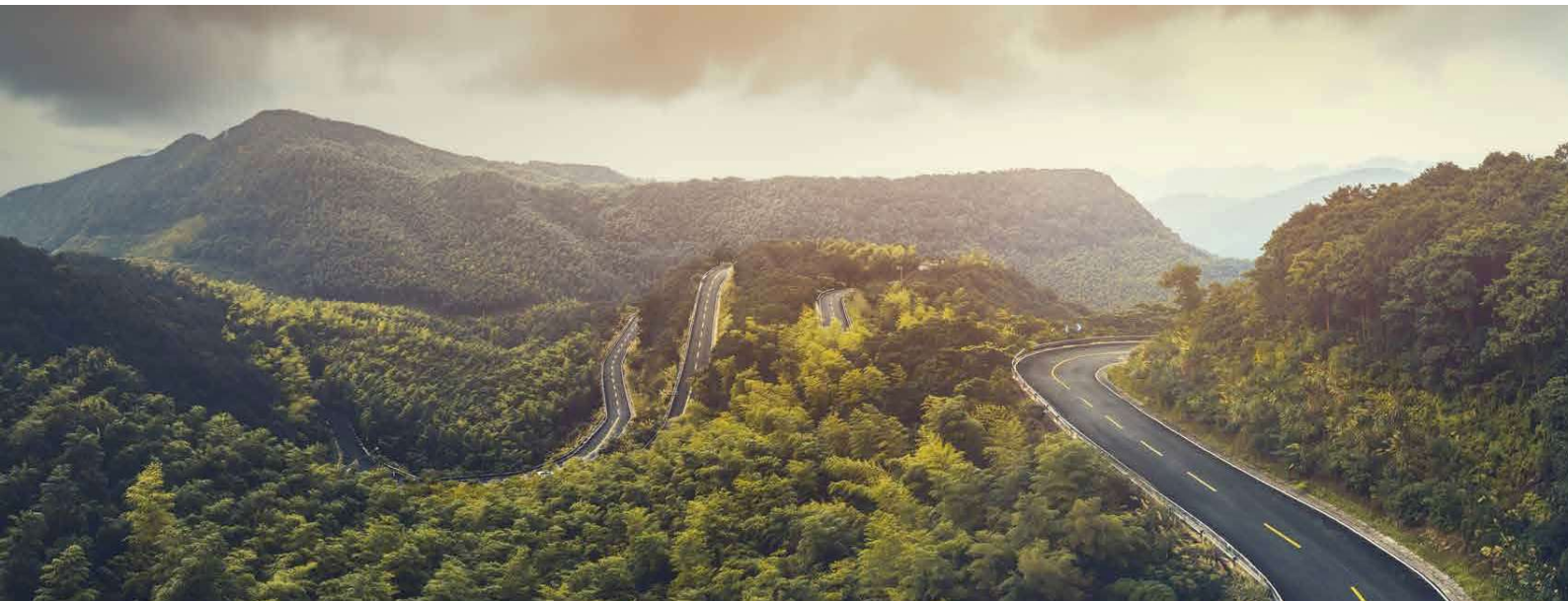
## 1. Introduction

This Supplier Code of Conduct provides an overview of the ethical, legal, environmental, and social standards expected of all suppliers, contractors, and business partners providing goods or services to Adient globally. It reflects our commitment to responsible sourcing, sustainability, and human rights across the supply chain.

## 2. Scope

This Code applies to all suppliers, their affiliates, subcontractors, and all sub-tier suppliers. Suppliers are expected to cascade these principles throughout their supply chains and ensure compliance through appropriate due diligence and monitoring mechanisms.

For detailed requirements and expectations please consult [Adient's Global Supplier Standards Manual](#).

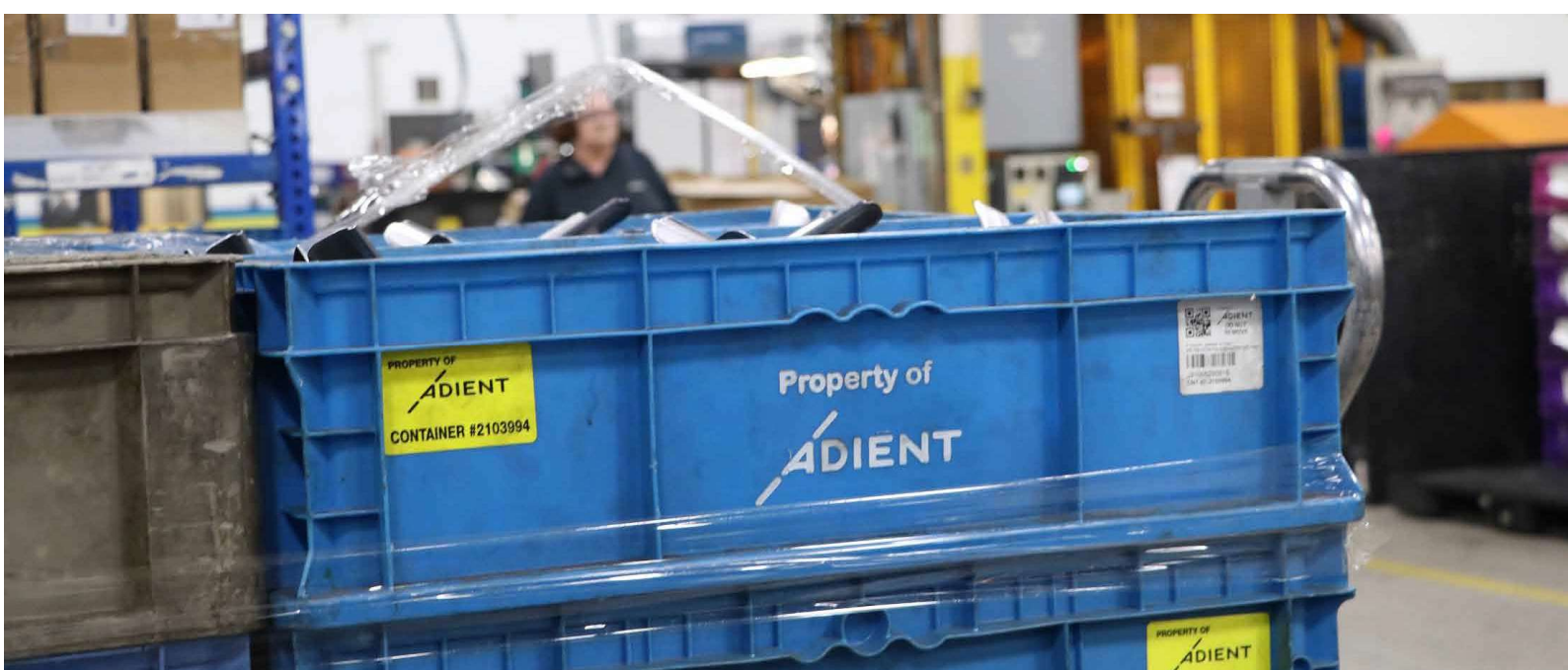


## 3. Business Ethics

Suppliers must:

- **Ethics Policy:** Adhere to Adient's Ethics Policy or an equivalent code of conduct and ensure their own suppliers comply as well.
- **Anti-Corruption and Anti-Bribery:** Comply with all anti-corruption and anti-bribery laws, including the US Foreign Corrupt Practices Act and local anti-corruption laws. Prohibit any form of bribery, extortion, embezzlement, money laundering, or other undue advantages.
- **Fair Business Practices:** Ensure fair business practices and comply with all applicable antitrust and competition laws.

- **Customs and Trade Compliance:** Comply with all applicable customs, import, export controls, international trade sanctions and embargoes imposed by the UN, US, UK, EU and the supplier's own country, and anti-boycott laws.
- **Privacy Laws:** Adhere to international privacy laws for data collection and processing, including requirements for international data transfers.
- **Data Protection:** Properly disclose conflicts of interest and protect business data, customer information, and intellectual property rights.
- **Violation Reporting:** Inform Adient promptly of any violations of the law, Adient's Ethics Policy, or the supplier's own code of conduct.
- **Non-Retaliation:** Prohibit retaliation against employees who raise compliance concerns in good faith within the supplier's own complaint mechanism or externally.
- **Compliance with Laws:** Comply to regulatory requirements applicable to the relevant region(s).
- **Due Diligence:** Participate and respond timely to Adient's requests for supplier and sub-tier supplier due diligence, certification, and supporting documentation.
- **Counterfeit Parts:**
  - **No Counterfeit Products:** Suppliers must not ship counterfeit items, defined as unlawfully reproduced or altered parts misrepresented as originals.
  - **Strict Procurement Policies:** Suppliers must maintain policies that ensure traceability of all product components.



#### 4. Human Rights and Labor Practices

Suppliers must:

- Treat workers with dignity and adhere to Adient's [Global Supplier Standards Manual](#) and [Ethics Policy](#) (or their own equivalent policy), which include more detailed requirements and expectations related to human rights and labor practices
- Prohibit child labor and comply with all applicable international, national and local laws regarding child labor.
- Prohibit all forms of forced, bonded, or involuntary labor.
- Ensure fair wages, working hours, and benefits in accordance with local laws.
- Respect freedom of association and collective bargaining rights.
- Provide a workplace free from discrimination, harassment, and abuse.
- Respect the rights of indigenous peoples and local communities, including land and water rights.



#### 5. Health and Safety

Suppliers must:

- Provide a safe and healthy working environment.
- Comply with all occupational health and safety laws and regulations.
- Conduct regular risk assessments and implement preventive and corrective measures.
- Provide appropriate training, personal protective equipment (PPE), and emergency preparedness plans.
- Ensure clean and sanitary facilities, including dormitories, if provided.

## 6. Environmental Responsibility

Suppliers must:

- Submit EcoVadis Sustainability Survey if requested.
- Comply with environmental laws and obtain necessary permits.
- Implement an Environmental Management System (e.g., ISO 14001).
- Minimize greenhouse gas emissions, energy use, and waste.
- Implement responsible water use.
- Avoid deforestation and protect biodiversity.
- Promote circular economy principles and sustainable product design.
- Report Scope 1, 2, and 3 emissions upon request.
- Provide product carbon footprints upon request.

## 7. Responsible Sourcing

Suppliers must:

- Ensure transparency and conduct thorough due diligence on all supplied parts, components, and raw materials, including conflict minerals (tin, tungsten, tantalum, gold), cobalt, lithium, and nickel.
- Source materials ethically, in compliance with sanctions regulations, and from conflict-free regions.
- Follow OECD Due Diligence Guidance for Responsible Supply Chains.

[OECD Due Diligence Guidance for Responsible Business Conduct | OECD](#)



## 8. Compliance and Monitoring

Suppliers must:

- Ensure they comply with all regulations and laws referenced in this Supplier Code of Conduct and must maintain appropriate documentation and demonstrate compliance upon request.
- Allow audits and site visits by authorized representatives.
- Implement grievance mechanisms and whistleblower protections.
- Implement appropriate remedial measures upon identification of any violations.

Cooperate with Adient in investigations and provide transparency in remediation efforts.

## 9. Continuous Improvement

Suppliers are encouraged to:

- Set measurable sustainability goals aligned with the Paris Agreement.
- Engage in innovation to reduce environmental and social impacts.
- Share best practices and collaborate on supply chain improvements.

## 10. Enforcement

Effective date: February 2026

Compliance with this Supplier Code of Conduct is required for suppliers to Adient; however, it does not establish a supplier relationship or constitute an offer, purchase order, award letter, or any form of contract. Failure to comply with this Code may result in corrective action, suspension, or termination of the business relationship. Suppliers are expected to proactively address risks and demonstrate commitment to ethical and sustainable practices.

The Supplier Code of Conduct does not address every possible situation. For questions about circumstances not covered within this document, contact your representative at Adient. Adient reserves the right to modify the Supplier Code of Conduct or any of its sections at any time to meet the changing requirements of Adient, its customers, or applicable laws.

