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Revision	Release Date	Description of Changes
8.0	01-October-2023	<ul style="list-style-type: none"> General expectations updated (4.1, 4.3.2) Responsibilities updated (4.3.1) Labor Requirements updated (4.3.3) Environmental Responsibility section updated (4.3.5) IMDS and CAMDS detailed under Environmental Responsibility (4.3.5) Conflict Minerals as a stand-alone section (4.5) Program Management and Engineering Requirements updated (4.6) Adient Data Exchange (AdientDX) and Taulia sections merged into Web Applications section (4.8) Wording updated
9.0	01-October-2024	<ul style="list-style-type: none"> Subject Matter Expert, Process Champion updated. Purpose updated (1.0) Responsibility updated (3.0) General Expectations section updated (4.1) Environmental, Social and Governance Responsibility section updated (4.3) Conflict Minerals section updated (4.5) External laboratory requirements section updated (4.7) Web Applications section updated (4.8) Records Retention section updated (4.9) Data protection and Cybersecurity section updated (5.0) References updated (7.0)

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1.0 Purpose

This standard communicates Adient's minimum set of requirements to the suppliers.

2.0 Scope

This standard applies to all Adient 3rd party suppliers.

3.0 Responsibility

All external suppliers (Direct Material and Indirect Material/ Services, Supply Chain and Tooling, Machinery & Equipment Suppliers) are expected to comply with all requirements and expectations documented in the Adient's Global Supplier Standards Manual (GSSM).

Suppliers are responsible for reviewing new and revised Adient Requirements including Customer Requirements and determining the impact on their Management System and promoting awareness of the GSSM at their locations.

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4.0 Process

The following supplier requirements and resources are outlined in this document:

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- 4.1 General Expectations: Adient expects from suppliers to demonstrate their commitment to create a sustainable future for their employees, customers, and communities, to quality and to the environment and to cascade the **Environmental, Social and Governance** related expectations to their supply chain. Key to this commitment is the implementation of appropriate Quality, Environmental and Health and Safety management standards, **considering different risk factors i.e. climate change aspects and conducting due diligence.**

Quality Requirements: Adient Quality requirements for all external suppliers can be found in the Global Supplier Standards Manual (GSSM) Quality chapter, which is available in the Adient Supplier Portal under [Supplier Expectations](#).

Supply Chain Management (SCM) and Packaging Requirements: Adient SCM requirements for all external suppliers can be found in the Global Supplier Standards Manual (GSSM) Supply Chain Management chapter and in Global Supplier Packaging Standards & Requirements, which are available in the Adient Supplier Portal under [Supplier Expectations](#).

Tooling Requirements: Adient Tooling requirements can be found in the Global Supplier Standards Manual (GSSM) Tooling chapter, which is available in the Adient Supplier Portal under [Supplier Expectations](#).

Failure to comply with **any Adient** requirements will impact the supplier's ability to continue business with Adient.

If you need more detailed information or have more specific questions, please contact your Adient Purchasing representative!

4.2 Global Terms and Conditions

4.2.1 Access to Global Terms and Conditions: Terms and Conditions may be reviewed by accessing: <http://www.adient.com/suppliers/legal>.

4.2.2 Adient Systems: The supplier is required to ensure to have all required access to the Adient system which can be found under <http://www.adient.com/suppliers/online-resources>.

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4.3 Environmental, Social, and Governance Responsibility

Two ways we live and demonstrate this value are by investing in businesses, people, and communities for the long term, and by taking personal responsibility for health, safety, and our environment. From this it becomes clear that Environmental, Social, and Governance Responsibility are foundational elements of who we are. Furthermore, since our supply base is an integral part of our business and team and is a reflection of Adient and the values we uphold, it is our expectation that our suppliers conduct their operations in a sustainable responsible manner. The goal is to work collaboratively with suppliers to ensure the following:

- Compliance with applicable laws, regulations, Adient's Ethics Policy or the supplier's own equivalent code of conduct and Adient's Environmental commitment.
- Required participation in Adient's sustainability and responsible sourcing initiatives, including the completion of surveys and any additional tasks that may be required.
- Integration of environmental, occupational health and safety, and human rights and labor policies into the decision-making process based on a sound management system.
- Obtaining of ISO 14001 or EMAS (Eco-Management and Audit Scheme) or RCMS (Responsible Care Management System) certification for their environmental management system, ISO 45001 or RCMS for their health and safety management system, ISO 50001 certification for their energy management system.
- Clear, accurate and appropriate reporting to Adient upon request.
- Conformance with any customer specific requirements or forms (check with your Adient Purchasing representative for the customer specific requirements that may be required).

Additional information related to Adient's commitment to sustainability maybe found at <https://www.adient.com/about-us/sustainability/>

4.3.1 Labor Requirements

Suppliers shall treat workers with dignity and respect and:

- Comply with internationally recognized human rights and ensure fair labor conditions and ethical recruiting.
- Prohibit the use of forced, bonded, indentured labor, involuntary, or prison labor.
- It is mandatory that all suppliers and vendors directly or indirectly exporting to Adient in the United States comply with the Uyghur Forced Labor Prevention Act (UFLPA) requirements, which prohibits the importation of goods into the USA sourced from China's Xinjiang Uyghur Autonomous Region; additionally, thoroughly screen and continuously monitor supply base down to the original raw material harvest or mining operation against UFLPA Entity list published by the U.S. Department of Homeland Security (DHS), every time is updated or amended, and hold suppliers to the same requirements. Send at Adient's request and with no delay any and all documents required to prove that the goods/ parts shipped to Adient are free of forced labor through the supply chain as required by the UFLPA and/or all applicable laws of the importing country or as requested by Adient (such as supply chain mapping).
- Comply with all principles enunciated in the UN Global Compact.
- Allow workers to leave employment upon reasonable notice and not require workers to hand over government-issued identification; passports or work permits as a condition of employment. Prohibit modern slavery and human trafficking.
- Comply with all applicable international, national and local laws regarding child labor.
- Set work hours to comply with local law. Limit a workweek to 60 hours or less, including overtime, except in emergency or unusual situations.
- Comply with applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Employees receive at least the minimum wage required by law or the prevailing industry wages whichever is higher. Workers receive full

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details regarding deductions for taxes, benefits, etc. Wages are not deducted for disciplinary purposes and are paid in cash, check form or by direct deposit.

- Maintain workplaces free of physical or mental harassment, abuse, or any other behavior that diminishes a person's integrity and self-esteem. This includes harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, verbal abuse of workers.
- Maintain workplaces free of unlawful discrimination and harassment in all of its forms, including that related to color, race, gender, sexual preference, age, pregnancy, caste, disability, union membership, ethnicity, and religious beliefs. This applies to hiring, salary, benefits, advancement, discipline, termination, and retirement.
- Prohibit the use of private or public security forces from engaging in activities that may lead to violations of human rights.
- Respect voluntary freedom of association, including the right to organize and bargain collectively in a manner that is legally compliant. Workers' representatives are not subject to discrimination and have access to workplaces necessary to carry out their respective functions. Where worker representation and collective bargaining are restricted by law, efforts should be made to facilitate open communication and direct engagement between workers and management as alternative ways of ensuring that workers' rights, needs and views are considered and acted upon appropriately and in good faith.

4.3.2 Health and Safety

Suppliers shall practice the following:

- Control worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, heat, vehicles, and fall hazards) through proper design, engineering and administrative controls, preventive maintenance and safe work procedures (including lockout/ tag-out). Where hazards cannot be adequately controlled by these means, provide workers at no cost as appropriate the proper personal protective equipment and ensure proper maintenance of the equipment. Workers are not disciplined for raising safety concerns.
- Maintain appropriate emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.
- Provide an organizational and technical fire protection (e.g. fire drill; regular check of fire protection equipment).
- Manage, track and report occupational injuries and illnesses, including provisions to a) encourage worker reporting; b) classify and record injury and illness cases; c) provide necessary medical treatment; d) investigate and implement corrective actions to eliminate their causes) facilitate return of workers to work.
- Assess the existing working conditions and health and safety risks on a regular base to define measures to reduce the identified risks.
- Identify, evaluate and control worker exposure to chemical, biological, radiological and physical agents as well as physically demanding tasks. Provide appropriate personal protective equipment when hazards cannot be otherwise controlled.
- Provide and properly maintain machine safeguards, interlocks and barriers.
- Provide clean toilet facilities, access to potable water and sanitary food preparation and storage facilities. Worker dormitories provided by the vendor, or a labor agent are to be clean, safe, and provide emergency egress, adequate ventilation and reasonable personal space.
- Allow Mandatory Health Setup Check (e.g. eye test; working at height; working with harmful substances).
- Ensure that the company Health & Safety policy covers also activities carried out by the subcontractors.

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4.3.3 Environmental Responsibility

Suppliers should implement environmental management system that involves following:

- Carbon Neutrality: As suppliers make up Adient's Scope 3 emissions, suppliers are expected to work towards net zero greenhouse gas (GHG) emissions and to follow Adient emission reduction/ decarbonization goals and renewable energy objectives.
- CO2 Reduction: Adient will reduce 75% of Scope 1&2 greenhouse gas emissions and 35% of Scope 3 greenhouse gas emissions by 2030. Adient expects its suppliers to take measures to reduce their greenhouse gas (GHG) emissions from their own operations and in their supply chain overall (carbon emissions in tons (scope 1, 2 and 3)). Adient requests its suppliers to implement initiatives to reduce Product Carbon Footprint from its product life cycle "cradle to gate" of their delivered products. The supplier must monitor and report on its progress to Adient during regular reviews. Adient encourages its suppliers to gain, at a minimum, limited assurance for the data that they report.
- Energy: Adient expects its suppliers to implement a system that monitors energy consumption with the focus to reduce it, and to improve energy efficiency. Adient strongly recommends its suppliers to convert to renewable electricity if it is an option within their region. Upon request it may be required from the supplier to support Adient in meeting renewable energy objectives mainly for renewable electricity (excluding fossil sources such as coal, natural gas or oil and switching to renewable sources either at site or through purchased certificates or similar).
- Water Quality, Consumption & Management: Adient expects its suppliers to introduce measures to reduce, reuse and recycle water. In addition, suppliers are expected to responsibly treat wastewater discharges to protect the environment as required and to continuously improve water management where possible. Suppliers are committed to identify and comply with all local legal requirements related to water and wastewater management. Supplier's water management should include regularly performed water risk assessments and to have a mitigation plan.
- Air Quality: Adient expects its suppliers to monitor, treat, control and minimize their air emissions such as volatile organic compounds (VOCs), corrosives, particulate matter (PM), ozone-depleting substances, air toxics and combustion by-products generated from business and manufacturing operations. Suppliers should do this as required by and in accordance with applicable law.
- Responsible Chemical Management: Adient expects its suppliers to manage chemical substances in a way to keep their employees and environment safe and not to use any prohibited substances in products and production processes. Suppliers must adhere to applicable laws and contract requirements regarding prohibition or restriction of specific substances, materials and waste, including compliance with the Minamata Convention on Mercury, the POPs Convention on Persistent Organic Pollutants, and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal.
- International Materials Data System (IMDS) - <https://www.mdsystem.com/>
IMDS is a global standard used by all automobile manufactures and we expect our suppliers to submit IMDS to meet customer and legal obligations (government and industry regulations, including environment, safety, corporate governance and product performance) for prohibited substances.

IMDS submissions shall include all materials present in the finished product and full disclosure of intentionally added substances. All materials and substances reports must follow customer reporting requirements in IMDS and the IMDS terms of use and recommendations.

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- Chinese Automotive Material Data System (CAMDS) - www.camds.org
CAMDS is the Chinese version of the IMDS. It is a web-based application. Upon agreement and when Adient has to comply with the Chinese material data reporting via CAMDS, suppliers shall report their material and substance content in compliance with the customer reporting requirements for CAMDS and to the CAMDS rules.
- Circularity: Adient encourages its suppliers to promote closed loop systems by supporting the use of sustainable, renewable natural resources over all operations while reducing waste and increasing reuse and recycling at disposal stage of end-of-life products. Adient requires its suppliers to report data on recycled or renewable content available to Adient via the IMDS system (according to the requirement of IMDS Recommendation 025) and any other agreed communication system.
- Animal Welfare: Adient recommends its suppliers to protect the welfare of animals and provide humane treatment in line with the five animal freedoms formalized by the World Organization for Animal Health (OIE). Suppliers will not supply any raw materials, components, parts, or assemblies to Adient involved testing on animals.
- Biodiversity, Land Use and Deforestation: Adient requires its suppliers to perform a due diligence on the following:
 - For cattle products such as the leather used in seat covers. Adient recommends its suppliers to obtain leather certifications like from the Leather Working Group (LWG), and Sustainable Leather Foundation (SLF).
 - For timber-based packaging such as wood pallets, cardboard, and paper packaging. Adient recommends its suppliers to obtain packaging certifications like Forestry Stewardship Council (FSC), Sustainable Forests Initiative (SFI), and Program for the Endorsement of Forest Certification (PEFC).
 - For soy and palm oil products, which are used as plant-based substitutes for polyols in less amounts in a limited number of foam products. Adient recommends its suppliers to obtain soy product and palm oil certifications like from Roundtable on Responsible Soy (RTRS) and Roundtable on Sustainable Palm Oil (RSPO).

See [Adient's Deforestation Policy](#)

- Soil Quality: Adient encourages its suppliers to monitor and control their impact on soil quality to prevent soil erosion, nutrient degradation, subsidence, and contamination.
- Noise Emissions: Adient encourages its suppliers to monitor and control the levels of industrial noise to avoid noise pollution.
- Oceans: Adient encourages its suppliers to take action to prevent and mitigate environmental risk to oceans.

4.3.4 Supplier Diversity

Adient recognizes the importance of diversity – in both the own workforce and the supply base – in driving strong business performance. Adient is committed to buying from diverse suppliers and growing their capacity and expects its suppliers to implement their own supplier diversity best practices. Suppliers invited to participate in the Tier 2 initiative are expected to:

1. Execute Diverse Business Initiatives (DBIs) outlined below; and
2. Report purchases with certified diverse-owned businesses. A minimum of 5%* of Adient sales purchased with certified-diverse suppliers (see preferred certifications listed below)

*Please note the 5% minimum is a standard and your goal may be increased to match the availability of diverse suppliers in your commodity. Spend targets will be communicated by Adient Purchasing.

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3. Report quarterly in our Tier 2 platform, iQuantum (<https://adient.quantumsds.com>)

Diversity Business Initiatives (DBI):

1. Designate a supplier diversity coordinator.
2. Support global, national and/or regional council (see certifying councils below)
3. Attend supplier diversity tradeshows or outreach events.

Certified-Diverse Supplier Definition:

A for-profit business that has been certified by at least one of the following certifying councils and is at least 51% owned, operated, and controlled by a diverse person or group.

Diverse Classification	Certifying Councils
MBE - Minority Business Enterprise which includes the ethnicities as defined by the certifying councils. In the U.S. ethnicities include African American, Hispanic American, Asian Pacific American, Asian Indian American, Native American	<u>NMSDC</u> National Minority Supplier Development Council <u>CAMSC</u> Canadian Aboriginal and Minority Supplier Council <u>MSDUK</u> Minority Supplier Development United Kingdom <u>SASDC</u> South Africa Supplier Diversity Council <u>MSD China</u> Minority Supplier Development China
WBE – Women business enterprise	<u>WBENC</u> Women’s Business Enterprise National Council <u>WBE</u> Canada <u>WEConnect International</u> (non-U.S.)
VBE – Veteran business enterprise DVBE – Disabled veteran business enterprise	<u>NVBDC</u> National Veteran Business Development Council
LGBT - Lesbian, gay, bisexual, and transgender business enterprise	<u>NGLCC</u> National LGBT Chamber of Commerce
DOBE – disability-owned business enterprise	<u>Disability: IN</u>

Additional information regarding our Global Supplier Diversity initiatives can be found at <http://www.adient.com/suppliers/supplier-diversity>.

4.3.5 Ethics and compliance with laws

Suppliers are expected to uphold the highest ethical standards to include:

- Abide by Adient’s Ethics Policy (available at <http://www.adient.com/ethics>) or the supplier’s own equivalent code of conduct. The supplier shall communicate the expectations in this Manual to its own suppliers and hold them accountable to comply with the same standards, laws and regulations.
- Comply with all anti-corruption and anti-bribery laws (the US Foreign Corrupt Practices Act, local anti-corruption laws and all other laws prohibiting any form of commercial or private bribery, extortion, embezzlement, -money laundering or other undue or improper

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advantages) and prohibit anything of value paid to a government official on behalf of Adient for an improper purpose. Follow all applicable laws that prohibit the giving of anything of value to any person or entity to obtain an improper business advantage.

- Prohibit any gift or entertainment to an Adient employee to induce or unduly influence a business decision (e.g. awarding business or favorable terms to the supplier).
- Ensure fair business and comply with all applicable antitrust and competition laws and don't engage in any act that improperly restrains competition.
- Comply with all applicable customs, import, supply chain security, export controls and anti-boycott laws and requirements, as well as laws that prohibit or restrict business relationships with embargoed countries and regions and sanctioned entities, persons and industry sectors.
- Comply with and apply all requirements from international applicable privacy laws of countries from which personal data is being collected and processed, including necessary due diligence for own processes and towards subcontractors. Furthermore, implement requirements from applicable privacy laws with regards to international data transfers.
- Properly disclose and protect business data, customer information, conflicts of interest and intellectual property rights in accordance with applicable privacy and information- and cyber-security laws and regulatory requirements and prevailing industry practices.
- Inform Adient promptly in the event of a violation of the law, Adient's Ethics Policy or the supplier's own equivalent code of conduct while working for Adient. To report suspected violations to Adient's Integrity Helpline visit <https://www.adient.com/suppliers/corporate-responsibility>.
- Prohibit retaliation against any employee who raises a compliance concern in good faith.
- Participate and timely respond to all Adient requests in connection with supplier due diligence, certification and statement requests, questionnaires and supporting documentation.

4.4 Counterfeit parts

The supplier ensures that there is no risk of counterfeit product being shipped to Adient. Counterfeit product is defined as items that are, or contain, unlawful or unauthorized reproductions, substitutions or alterations that have been knowingly mismarked, misidentified or otherwise misrepresented to be an original manufacturer's part. The supplier must have strict procurement policies in place to ensure traceability for all items incorporated in the product.

4.5 Conflict Minerals

Adient is required to comply with existing and future reporting requirements regarding the use of conflict minerals in its products under

- Section 1502 of the US Dodd-Frank Wall Street Reform and Consumer Protection Act and the U.S. Securities and Exchange Commission ("SEC") rules and regulations.
- reporting requirements of our customers under the EU non-financial reporting directive 2014/95/EU as laid down in the guideline published in the official journal of the EU (2017/C215/01) and the EU Conflict Minerals Regulation 2017/821 as laid down in the guideline published in the official journal of the EU (32017R0821).
- Adient must perform due diligence on and make disclosures concerning its use of conflict minerals originating in the Democratic Republic of the Congo and adjoining countries or any other high-risk country as defined by the legal authorities.
- All Adient suppliers are required to respond to information requests from Adient regarding the uses and sources of conflict minerals in their products including information about minerals that are recycled or scrap.
- In order to respond to Adient's information requests, suppliers will need to make similar inquiries of their suppliers as a means to investigate the source of materials in their products, and to provide Adient the requested information based upon the results of such inquiries (i.e. **supply chain mapping**).

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- Adient may be required, and may require its suppliers, to perform due diligence on the source and chain of custody of its conflict minerals in accordance with the “OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.” In addition, suppliers may be required to make certain representations/ certifications with respect to the use of conflict minerals/ **responsible sourcing**.
- Additional information on conflict minerals may be obtained through links on the SEC website (<http://www.sec.gov>) or the European Commission Trade website (<http://www.ec.europa.eu/trade/>) or the AIAG ([What are Conflict Minerals & Responsible Materials - \(3TG\) | AIAG](#)).

4.6 Program Management and Engineering Requirements

In regard to the Adient Program Management Expectations, the following summarizes the expectations and compliance with processes:

- Suppliers must comply with all program-specific requirements as outlined in the specific program Supplier Statement of Work (SSOW)
- Launch support is required by the supplier to engage in Simultaneous Development Teams (SDT) activities at ADIENT such as:
 - Supplier Kick-off Meetings
 - Design Reviews
 - SDT Meetings
 - Advance Quality Planning (AQP) activity
 - Build Events (technical centers and production plants)
 - Etc.
- Launch support is required by the supplier to engage in Simultaneous Development Teams (SDT) activities at the supplier facilities such as:
 - Supplier Build Events
 - Supplier Readiness Reviews
 - Supplier Process Sign-Off Reviews

In addition, suppliers are required to implement a design and development planning process according to IATF 16949.

Engineering support for product feasibility, product design and tooling design / approval may be required for a particular program. Suppliers will be expected to support design reviews and other collaborative efforts to support low-cost solutions for tools and products.

4.7 External laboratory requirements

All external/ commercial/ independent laboratory facilities used for inspection, test or calibration of Adient Inspection, Measuring and Test Equipment (IMTE) must comply with the following principles:

- The laboratory facility must be accredited to ISO/IEC 17025 or its national equivalent (e.g. CNAS-CL01 in China) by an accreditation body (Signatory) of the ILAC MRA (International Laboratory Accreditation Forum Mutual Recognition Arrangement www.ilac.org)
- Services provided (e.g. inspection, test, or calibration) must be included on the supplier’s scope of the accreditation (certificate). **The test or calibration certificate must include the mark of a national accreditation body or there must be evidence that the laboratory is approved by the customer (e.g. customer assessment or customer approved second-party assessment).**
- Services not accredited to ISO/IEC 17025 / where non-accredited laboratory is utilized (e.g., but not limited to: specialist or integrated equipment, parameters with no international traceable standard reference, or original equipment manufacturers), a special Adient approval is required to be ensured that there is evidence that the laboratory has been evaluated and meets the requirements of IATF 16949 section 7.1.5.3.1.

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- For IMTE used in A2LA accredited facilities, the calibration facility must be accredited by a mutually accrediting body (i.e. A2LA, NVLAP, IAS, or ACLASS).
- The facility must notify Adient, if being asked to calibrate an IMTE that they are not accredited to perform.
 - A facility cannot sub-contract or broker calibration without Adient permission.
 - Tolerance Uncertainty Ratios (TUR) shall meet or exceed 4:1 or be noted on the report.

4.8 Web Applications

4.8.1 Adient Data Exchange (AdientDX): An internally developed, web-based tool for secure exchange of data, both internally and with our suppliers/OEMS (AdientDX supports OFTP2 protocol for direct connectivity with OEM systems). Although it was originally intended for CAD/CAE data, AdientDX can transfer any large data files securely.

Supplier access to AdientDX – Suppliers can access the AdientDX site by going to the link below and following the instructions. If you have any issues or concerns, please contact CAD-EDI-GLOBAL@adient.com or your buyer.

To request an account and launch AdientDX select the following link: <https://cadx.adient.com/#Login>

4.8.2 Taulia: With Taulia, Adient suppliers have 24/7 online access to electronic communications, invoicing, PO and payment remittance details. Suppliers are able to maintain their company information, contact details and current certificates (i.e. QMS, EMS, HSMS, EnMS) via Taulia. Enrolling is free. And supplier's information and payment through Taulia is always secure. Further information about Taulia can be obtained on the Adient supplier portal: [Online Resources | Adient \(covisint.com\)](#).

Suppliers are expected to review and update their current valid contacts, certifications and payment details **at least once per year**, to ensure any such changes are submitted to Adient on time.

Note: Invoicing, PO and payment remittance is applicable for NA & EU only.

4.8.3 Process Unity: Suppliers must submit financial statements or any other financial information through ProcessUnity when requested, in accordance with the Terms & Conditions.

4.8.4 Issue Resolution Information System (IRIS)

Issue Resolution Information System (IRIS) is an Adient electronic system for supplier communication and resolving of Quality (SMRR) and Supply Chain (DMR) related incidents as well supplier charge backs (SCBs). IRIS is an online tool for problem-solving which provides standardized method for managing of Quality and Delivery issues to all suppliers.

Suppliers are expected to review and update their contact details in IRIS (e.g. Quality and Logistics representative) at least once per year to ensure proper management of SMRRs, DMRs and SCBs.

4.9 Records Retention

All suppliers must implement a records retention policy for all records and documentation in relation to business conducted with Adient.

Suppliers are expected to maintain audit results, records, and performance measures to share with Adient as appropriate.

Production part approvals, tooling records (including maintenance and ownership), product and process design records, purchase orders (if applicable), or contracts and amendments shall be

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retained for the length of time that the product is active for production and service requirements, plus one calendar year, unless otherwise required by applicable law or regulatory agency, or as otherwise specified by Adient.

Note: Production part approval documented information may include approved product, applicable test equipment, or approved test data.

5.0 Data Protection and Cybersecurity

- 5.1 Personal Data: "Personal Data" refers to Adient data regulated by applicable laws or regulations as personal data/personally identifiable information. However, Personal Data does not include anonymized/ de-identified information of Adient used in aggregate for data analytics or other lawful business purposes.
- 5.2 Data Processing: If Suppliers hold, retain, store, transmit, use and/or otherwise process Personal Data in connection with providing services to Adient, they must:
- Comply with applicable laws and regulations relating to data privacy (including but not limited to the Personal Information Protection and Electronic Documents Act ("PIPEDA"), the California Consumer Protection Act of 2018, the General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR") and any applicable national implementing laws);
 - Adhere to data protection terms and conditions approved by Adient, which include restricting access to Personal Data, applying appropriate security measures to protect Personal Data, not disclosing Personal Data to third parties without Adient's prior authorization.
- 5.3 Data Security. All Suppliers shall maintain appropriate logical, physical, technical and organizational security measures to prevent loss, destruction, or unauthorized access to any data. These measures must comply with all applicable laws, regulations, or industry requirements applicable to such data, including, without limitation, laws and regulations relating to data privacy and cybersecurity.

Suppliers shall utilize reasonable and appropriate practices and technologies common in their respective industries, including, but not limited to:

- Encryption,
- Firewall protection,
- Intrusion detection and prevention tools,
- Network management applications.

Additionally, Suppliers shall maintain a written, comprehensive information security plan. This plan must specify adequate and appropriate technological, physical and organizational security measures and standards for

- Cybersecurity,
- Configuration and anti-virus protection.

This applies to the Supplier's facilities, computer systems, employees, representatives and contractors, third parties under its control.

Suppliers shall regularly test or monitor the effectiveness of such security measures to ensure protection against cyber risks and treats.

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5.4 Data Security Incidents

5.4.1 “Security Incident” **refers to** the unauthorized access or acquisition of Personal Data, **compromising its** security, confidentiality, or integrity as defined by applicable breach notification laws or regulations.

5.4.2 **Supplier Responsibilities**

If a Supplier becomes aware of a Security Incident involving Personal Data in its possession or control, it shall immediately:

- Notify Adient of the Security Incident **unless** expressly prohibited by law, court order, and/or law enforcement officials;
- Provide a description **of the incident** and identify the types of Personal Data involved in the Security Incident, **to the best of its knowledge at the time**;
- Take all necessary steps to remedy the circumstances that **allowed** Security Incident to occur;
- Take all **measures** required by applicable law, regulation, **or customer** to minimize or mitigate the risk of harmful effects resulting from the Security Incident.

6.0 **Records/Logs**

Not applicable.

7.0 **References**

Adient Supplier Portal: <https://www.adient.com/suppliers>

Adient Sustainability and Diversity, Equity, and Inclusion: <https://www.adient.com/about-us/sustainability/>

International Labor Organization (ILO) Standards & Guidelines: <https://www.ilo.org/international-labour-standards>

United Nations Global Compact: <https://unglobalcompact.org/>

United Nations Sustainable Development Goals: <https://www.un.org/sustainabledevelopment/sustainable-development-goals/>

Uyghur Forced Labor Prevention Act (UFLPA) [UFLPA | Homeland Security \(dhs.gov\)](#)

Ethical Trading Initiative (ETI): <https://www.ethicaltrade.org/>

Responsible Minerals Initiative: <https://www.responsiblemineralsinitiative.org/>

Automotive Industry Action Group (AIAG): <https://www.aiag.org/>

ISO – International Organization for Standardization: <https://www.iso.org/home.html>