

## SUPPLIER CODE OF CONDUCT

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At Cooper Standard, we are more than just what we make. From the board room to the lunch room, our core values are the heart and soul of the company. Diverse Talent, Integrity, Community Partner, Total Safety Culture, Quality and Continuous Improvement are not just words on paper at Cooper Standard: they are how we work every day, everywhere.

Cooper Standard expects all of its suppliers to engage in responsible supply chain practices and to comply with this Supplier Code of Conduct (this "Code"). The provisions of this Code are in addition to, and not in lieu of, the provisions of any legal agreement or contract between a supplier and Cooper Standard or any of its subsidiaries or affiliates. We expect suppliers to hold their supply chain, including subcontractors, third party labor agencies and any contract and seasonal workers, to the same standards contained in this Code. This Code does not create any third-party beneficiary rights or benefits for suppliers, subcontractors, their respective employees or any other party.

Cooper Standard respects the law in its business operations and expects all of its suppliers to do the same by complying with all laws that apply to their respective businesses and their work with us, our subsidiaries and our facilities. In case of any conflict between what the law requires and the standards of this Code, each Supplier must meet the higher standard.

### INTEGRITY

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Everyone who works for and does business with Cooper Standard is expected to act with integrity, make the right decisions and take the right actions in compliance with applicable laws and regulations in the countries and jurisdictions in which they operate. Each supplier must be able to demonstrate compliance with this Code upon Cooper Standard's request and take action to correct any non-compliance. Cooper Standard, its subsidiaries and affiliates reserve the right to audit any supplier's compliance with this Code and to terminate any agreement or arrangement with any supplier who cannot or will not demonstrate compliance with this Code.

**Anti-Corruption and Anti-Bribery:** Suppliers shall comply with all anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act. Specifically, no supplier can offer or accept any bribe, kickback, favor or anything of value; engage in any extortion or embezzlement; or use any improper influence when dealing with government officials or in any business arrangements in order to obtain an improper advantage. In addition, Suppliers are prohibited from providing or offering gifts to Cooper Standard employees that could inappropriately influence Cooper Standard's business decisions or gain an unfair advantage.

**Books and Records:** Suppliers shall maintain accurate and transparent financial books, business records and accounts.

**Non-Retaliation:** Suppliers shall prohibit retaliation against employees who report a compliance or ethical issue learned during the course of work performed for Cooper Standard or who cooperate in good faith with the investigation of a complaint.

**Conflict Minerals:** To facilitate an assessment of upstream supply chain compliance, Suppliers must be

able to disclose supply chain mapping back to the primary origin associated with the products or services provided to Cooper Standard, its subsidiaries and affiliates for products which contain tin, tungsten, tantalum, gold or any other material or derivative designated by the U.S. State Department as a "conflict mineral". More specifically, suppliers are required to undertake reasonable due diligence with their supply chains to assure that conflict minerals are being sourced from mines and smelters outside the Democratic Republic of the Congo ("DRC") or an adjoining country (collectively, the "Conflict Region") or, if sourced within the Conflict Region, from mines and smelters that have been certified by an independent third party as DRC conflict free. To the extent any supplier does not currently have this capability, such a supplier is required to disclose its future plans to do so. Suppliers shall make all disclosures to Cooper Standard upon request within a timely manner.

**Confidentiality and Data Security:** Suppliers shall safeguard our information by keeping it secure (whether in paper, electronic or other media), limiting access and avoiding discussion or revealing such information in public places, even after our business relationship ends.

**Reporting:** Suppliers shall create internal programs, processes and procedures for handling reports of workplace grievances, including anonymous reports. Suppliers shall also promptly report actual or suspected violations of law or this Code to Cooper Standard. This includes actual or suspected violations by any employee or agent acting on behalf of either the supplier or Cooper Standard. To report a concern anonymously, visit <https://secure.ethicspoint.com/domain/media/en/gui/13016/index.html> for both online and international telephone options. Suppliers and their employees can also contact Cooper Standard at [ethicsandcompliance@cooperstandard.com](mailto:ethicsandcompliance@cooperstandard.com).

## HUMAN RIGHTS

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Cooper Standard requires each of its suppliers to conduct its activities in accordance with the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work and the United Nations Universal Declaration of Human Rights.

**Forced Labor:** Suppliers will not use any form of slave, forced, bonded, indentured or involuntary labor. Suppliers will not engage in human trafficking or exploitation or import goods tainted by slavery or human trafficking. Suppliers will not require payment of fees or the surrendering of government-issued identification, passports or work permits as conditions of employment.

**Child Labor:** Suppliers shall ensure that no underage labor has been used in the procurement, production or distribution of their goods or services. Suppliers will not employ children less than 15 years of age or 14 years of age where local law allows.

**Freedom of Association and Collective Bargaining:** Suppliers shall recognize and respect the rights of employees to associate or not to associate with any group, as permitted by law and in accordance with all applicable laws and regulations.

**Employment Status:** Suppliers shall employ only workers who are legally authorized to work in their location and facility and are responsible for validating employees' eligibility to work through appropriate documentation.

**Anti-Discrimination and Fair Treatment:** Suppliers shall encourage a diverse workforce and treat employees with fairness, dignity and respect. There will be no unlawful discrimination, harassment or abuse of any kind.

**Wages and Benefits:** Suppliers shall provide employees with compensation that includes wages,

overtime pay, premium pay and benefits that meet or exceed the legal minimum standards. Suppliers shall pay employees equal pay for equal work without discrimination. Suppliers shall pay employees in a timely fashion and make no deductions from pay for disciplinary reasons.

## TOTAL SAFETY CULTURE AND CORPORATE RESPONSIBILITY

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We ensure a safe and respectful environment with a focus on environmentally responsible materials, products and procedures.

**Health and Safety:** Suppliers shall provide employees with a safe, respectful, clean and healthy work environment. Each supplier is responsible for integrating comprehensive health and safety management practices and job-specific risk assessment, risk management and safety training into its business. Suppliers shall give their employees the right to refuse unsafe work and report unsafe or unhealthy working conditions. Each supplier will meet or exceed applicable laws and industry standards in this area. Suppliers will maintain a program to achieve continuous improvement in workplace safety. Suppliers will provide only products and services that are safe and in compliance with all applicable local and national laws.

**Environment:** Suppliers shall manage, measure and minimize the environmental impact of their facilities and demonstrate continuous improvement in areas such as air emissions; waste reduction, recovery and management; water use and disposal; energy usage; and greenhouse gas emissions.

**Chemical Compliance:** Suppliers shall maintain programs to actively participate in and comply with the requirements of all applicable chemical-related laws, such as Europe's REACH and RoHS and the automobile industry's International Material Data System.

By signing below, you agree that you have read this Supplier Code of Conduct and agree to abide by all its terms.

Supplier Company Name: \_\_\_\_\_  
Company Representative Signature: \_\_\_\_\_  
Company Representative Name (Printed): \_\_\_\_\_  
Date: \_\_\_\_\_