

INTEGRITY DRIVES US

GUIDING PRINCIPLES
FOR EVERY DECISION

Code of Conduct



LETTER FROM OUR CEO

Our Purpose: *Creating Sustainable Solutions Together* speaks to what we are trying to accomplish, but it is our values that speak to how we behave.

There are six values that we hold near and dear to our hearts. These are more than words that hang on the wall. They address how we conduct ourselves on behalf of Cooper Standard.

Our values define how we operate, and *Integrity Always* strengthens the foundation that supports how we live them every day. This is why we have a Code of Conduct to help guide our behavior so that we consistently act in a responsible and honest way. As a part of upholding integrity, we must also be willing to speak up when we see behavior that is not consistent with our Code of Conduct.

I encourage all team members to read and understand the Company's Code of Conduct and take it seriously, as this will help ensure that our Company is successful and sustainable.

When applied properly, our Code of Conduct benefits you, your family and all Cooper Standard stakeholders. It provides us with the guidance needed to ensure that our work is done in an ethical and legal manner at work and in the marketplace.

If you have any questions regarding our Code of Conduct or become aware of any violations, you should immediately contact one of the Company's [Ethics Reporting Resources](#) including your supervisor/manager, a member of the human resources team, the legal department, the Ethics and Compliance Office or any member of the Global Ethics and Compliance Committee.

The Cooper Standard IntegrityLine is also available to make a report, anonymously if desired*, at www.CSIntegrityLine.com. You can be assured that there will be no retribution or retaliation for asking questions, raising any concerns or reporting suspected violations of the Code of Conduct.

I encourage you to read our Code of Conduct and refer to it for guidance as needed. Our excellent reputation rests on how each of us conducts ourselves individually and together as a Company.

Sincerely,

Jeffrey S. Edwards

Chairman and Chief Executive Officer

*Please note that a few countries in which we operate do not allow anonymous reporting.



Jeffrey S. Edwards
Chairman and Chief Executive Officer

Our shared values make us who we are. And this is how we live them:

- We expect everyone to understand and follow this Code of Conduct.
- We count on each employee to make ethical choices in everything you do.
- We expect you to speak up for integrity and report anything that violates or appears to violate the Code.
- We will take your reports and questions seriously.
- We will not tolerate any kind of retaliation against people who raise concerns or make reports about behavior that appears to violate the Code.
- We strive to be world-class in everything we do, including conducting business with integrity.

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For more specific policies related to the topics addressed throughout our Code of Conduct, follow the hyperlinks provided or see the policy pages for each function on the [Cooper Standard Operating System](#) (CSOS) site, the [Global Policies](#) page on Enterprise Portal or the [Global Policies Hub](#) on CS Connect. At the time of publication, the Company's Chief Legal Officer (CLO) serves as the Company's Chief Compliance Officer (CCO). References in this Code and in our policies to the CCO include the CLO.

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INTEGRITY ALWAYS

At Cooper Standard, we work to fulfill our Purpose of *Creating Sustainable Solutions Together*. We strive for excellence in everything we do, and our Core Value of *Integrity Always* sets us apart. Our Code of Conduct defines what it means to act with integrity at Cooper Standard and provides guidance on our Company's policies and where to go for help. While one document cannot cover all the laws we must follow or all the choices we will face, it provides a roadmap for navigating those situations when business decisions might not be easy or obvious.

Integrity Drives Us to Be...

- **Honest** – We are truthful, trustworthy and transparent in all the work that we do.
- **Ethical** – We do business fairly, follow the laws, and hold ourselves and our team members to the highest standards of ethics.
- **Responsible** – We are driven by our responsibility to contribute to the good of our business and communities through ethical actions and speaking up when we see actions that do not reflect our values.





We Take Integrity Seriously

Cooper Standard takes the expectations laid out in this Code very seriously. Behavior that falls below the standards of conduct in this Code or violates our policies may result in disciplinary action, up to and including termination. Our Code and other Company policies are not intended to restrict communications or actions protected or required by applicable state or federal law.

INTEGRITY MUST DRIVE ALL OF US

Everyone's Responsibilities

Our Code applies to everyone at Cooper Standard - including the Board of Directors, Company officers, and team members worldwide, including part-time, temporary and contract personnel. Business practices may vary from country to country and culture to culture, but the standards of our Code apply universally, everywhere we do business. We are all responsible for protecting our culture of integrity. We must:

- **Act ethically.** Use good judgment and comply with the law and our Code. Seek guidance when faced with an ethical dilemma.
- **Understand our Code and related compliance policies.** Consult our Code and use it to help you make ethical decisions. For more details on a specific topic, review our policies on [CSOS](#), the [Global Policies](#) page on the Enterprise Portal, the [Global Policies Hub](#) on CS Connect or the links throughout the Code.
- **Speak up.** If you have questions, need advice or want to report a concern or possible violation of the law, our Code or our policies, contact your manager or one of our [Ethics Reporting Resources](#).
- **Cooperate fully.** Provide complete and accurate information if you are asked to participate in a misconduct investigation.
- **Never tolerate retaliation.** We do not tolerate threats or intimidation against anyone who in good faith raise a concern or reports possible misconduct.
- **Communicate our standards to business partners.** We expect suppliers, contractors, agents and anyone working on our behalf to uphold our standards. Suppliers must also comply with our [Supplier Code of Conduct](#), available on the Supplier Public Data page of the Company's website.

Further Responsibilities for Managers

While we are all responsible for upholding our values, team members often look to those in leadership roles to model and guide ethical behavior. Managers are often the first person team members turn to with questions and concerns about business conduct and have a profound effect on shaping a culture in which people feel comfortable raising concerns in the first place. Our managers have additional responsibilities to:

- **Set an example.** Act with integrity and respect, be a role model for your team. Demonstrate our values through your words and actions.
- **Promote a culture of integrity and respect.** Encourage your team to consult our policies and understand their responsibilities. Champion compliance.
- **Listen and offer guidance.** As one of our [Ethics Reporting Resources](#), it is your job to listen and respond appropriately when someone comes to you with a question or concern.
- **Understand your duty to report.** Certain matters must be escalated to the Ethics and Compliance Office*.
- **Honor and understand our [non-retaliation policy](#).** Take action to prevent it or to end it if you see it.
- **Ask for help.** If unsure of how to proceed, escalate the situation to your human resources representative or the Ethics and Compliance Office.

**Reports involving a financial, legal or regulatory matter must be escalated to the Ethics and Compliance Office by emailing ethicsandcompliance@cooperstandard.com prior to any action being taken. See our [Managers Guide](#) for responding to employee questions and concerns about business conduct for more information. When in doubt, managers should err on the side of caution and refer matters to the Ethics and Compliance Office for determination of whether the report qualifies as a financial, legal or regulatory matter.*



SPEAK UP FOR INTEGRITY

We expect team members to speak up, to both ask questions and raise concerns. We hope that ethical misconduct never happens at Cooper Standard, but if it does, we need to know about it so that we can work to resolve it. We depend on all our team members to recognize misconduct and expect them to report it to one of our [Ethics Reporting Resources](#). The sooner we learn about Code violations, the sooner we can end the behavior and work to resolve any issues.



Making Choices With Integrity

Integrity must drive how we do business every single day. While our Code addresses the most common legal and ethical questions you may encounter, not every situation can be addressed. When you face an ethical dilemma, ask yourself the following questions:

- **Is it legal?**
If it isn't, don't do it.
- **Does it reflect our values?**
Our values define who we are as a Company. Check out our [Purpose, Mission, Values and Capabilities](#).
- **Is it consistent with the letter and spirit of our Code and our other policies?**
When in doubt, check our policies sites located on [CSOS](#), the [Global Policies](#) page of the Enterprise Portal, or the [Global Policies Hub](#) on CS Connect.
- **Is this the best choice for the Company and for my team?**
We are responsible for each other, and we put the Company's interests before our personal interests.
- **Does this choice look right to someone else?**
We not only do the right thing, we avoid any appearance of wrongdoing as well.

If you answer "no" or "maybe" to any of these questions, you are expected to speak up and obtain guidance from one of the [Ethics Reporting Resources](#).



SPEAK UP FOR INTEGRITY

When Should You Speak Up?

When something doesn't seem right, we expect you to take action to address the issue and report it to Cooper Standard. You should report any suspected or actual violations of the law, our Code of Conduct, or our policies to one of the Company's [Ethics Reporting Resources](#).

Examples of issues that must be reported to an ethics reporting resource:

- Discrimination, harassment or bullying;
- Bribery or kick-back schemes;
- Inappropriate gifts or gratuities;
- Questionable accounting or auditing matters;
- Conflicts of interest;
- Product quality concerns;
- Regulatory violations;
- Insider trading;
- Disclosure of confidential information;
- Environmental, health, or safety concerns;
- Theft;
- Financial wrongdoing; and
- Inappropriate conduct with competitors.

Ethics Reporting Resources

To make a report, ask questions, or express a concern, contact one of our Ethics Reporting Resources:

- Your supervisor or manager
- Any member of the human resources team
- The legal department or the Ethics and Compliance Office (ethicsandcompliance@cooperstandard.com)
- Any member of the [Global Ethics and Compliance Committee](http://www.cooperstandard.com/ethics) (www.cooperstandard.com/ethics)
- The Cooper Standard IntegrityLine, anonymously if desired*, at www.CSIntegrityLine.com.

**Please note that a few countries in which we operate do not allow anonymous reporting.*

What Can You Expect When You Speak Up?

No matter how or when you make a report, you can expect to be treated with respect.

- We will take your report seriously and appreciate the integrity you show by coming forward.
- We will investigate all reports promptly, thoroughly and fairly. You are expected to participate in investigations when asked.
- While we will make reasonable efforts to safeguard confidentiality during and after the investigation, it might be necessary to disclose certain sensitive information on a need-to-know basis to conduct an effective investigation.
- Due to the confidential nature of any investigation, we are unable to share details of the investigation or any remedial actions taken as a result of your report. But we will take appropriate action to end unlawful or unethical activity. And we will not tolerate retaliation against you for your report.

INTEGRITY **LINE**

Cooper Standard IntegrityLine

We are committed to maintaining an environment where open, honest communications are the expectation, not the exception. We want you to feel comfortable approaching your supervisor or management with questions and concerns. At the same time, we understand there may be situations in which you prefer another option.

We established the Cooper Standard IntegrityLine, hosted by a third-party provider, NAVEX Global, to assist you in submitting reports related to violations of law or of our written standards and policies or seeking guidance related to ethics or compliance matters.

- **24/7.** The Cooper Standard IntegrityLine is available 24 hours a day, 7 days a week by telephone or internet at www.CSIntegrityLine.com.
- **Confidential.** The IntegrityLine is answered by people outside the Company at NAVEX Global who then forward reports to the Ethics and Compliance Office at Cooper Standard. Calls and online reports are not traced or recorded.
- **Anonymous — if you prefer.** You are encouraged to share as much information as possible, including your name and contact information, to assist in our investigation. However, if you are not comfortable sharing your name, your report is still valuable, and you may submit it anonymously, where allowed by local law.
- **Always investigated.** We take all reports about ethics and compliance matters seriously and will look into each report and follow up when further action is appropriate.
- **Interactive.** Our Company will do everything possible to respond to concerns in a timely manner. You will receive a reference number so that you can check the status of your report and, if you choose, communicate through IntegrityLine with the Ethics and Compliance Office while maintaining anonymity. You will not be provided with the details of resolution, but the status of your report will show “closed” when the investigation and all appropriate action are complete.



SPEAK UP FOR INTEGRITY

Open Door Policy

Our open door policy ensures that you receive the support you need when you have a question or need to report a concern. Your supervisor or manager is an important resource when you need help. Your supervisor is expected to listen and respond appropriately, including asking questions as necessary. Managers are expected to bring certain issues forward to human resources or the Ethics and Compliance Office.

If you don't feel comfortable going to your supervisor in the first place or you are not receiving the support you need, you are encouraged to take the matter to higher levels of management, to your human resources representative or to one of our other Ethics Reporting Resources.

Retaliation: What is it?

Treating someone differently because they made a report or participated in an investigation is retaliation. Retaliation can be obvious — for example, if a company demoted or fired someone for making a report, raising a concern or participating in an investigation in good faith. But it can also be more subtle.

Examples of retaliation also include:

- Moving someone's workspace to a less desirable location;
- Telling someone they are no longer needed in meetings where they have been active before;
- Threats of any nature;
- Denial of promotions or benefits; and
- Taking the whole department out to lunch except the person who made a report.

Non-retaliation Policy

At Cooper Standard, we do not tolerate retaliation in any form against anyone who makes a good faith report or participates in an investigation. Making a report in good faith means that the information you provided is complete and you believe it to be true. Individuals who are responsible for, or who participate in, retaliation could be subjected to disciplinary action, up to and including termination. If you believe you have experienced retaliation, report it to one of our [Ethics Reporting Resources](#) immediately. Anyone making a report not in good faith may be subject to disciplinary action.



INTEGRITY ALWAYS IN OUR WORKPLACE

- Mutual Respect
- Inclusion and Belonging
- A Safety First Workplace
- Fair Wages
- Protection of Assets
- Financial Records and Statements
- Records Management
- Information Systems
- Conflicts of Interest
- Confidential Information
- Intellectual Property and Trade Secrets
- Generative AI

INTEGRITY ALWAYS IN OUR WORKPLACE

Mutual Respect

Working for Cooper Standard means being part of a team of professionals who collaborate and treat one another with courtesy, dignity and respect. On our team, there's no place for bullying, harassment, or intimidation. By supporting and encouraging each other, we drive our Company forward.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Behave respectfully at all times.
- Do not act in a way that could make someone feel as if they are not part of the team.
- Speak up if someone is being treated disrespectfully or we observe acts that may be discriminatory or harassing.
- Do not tolerate retaliation against anyone for raising a good-faith report of harassment or discrimination.

Harassment: What is it?

Harassment is words or actions that someone would reasonably consider intimidating, hostile or abusive, or that create a situation that unreasonably interferes with someone's work. This includes behaviors like:

- Physical contact or touching the other person does not want;
- Racial, ethnic, or sexual innuendo or jokes;
- Offensive emails, photographs, or videos;
- Bullying a coworker; and
- Abusing a position of power for sexual favors.

Harassment can take many forms, including physical actions, spoken and written remarks, and videos or pictures.

While it can be sexual in nature, there are other types of harassment. For example, harassment may also be based upon race, pregnancy, age, ancestry, military or veteran status, color, religion, creed, disability, marital status, physical or mental disability, genetic information, national origin, gender, gender identity, sexual orientation, or any other characteristic protected by applicable laws.

Maintaining a respectful workplace means we do not allow harassment by any team member or by third parties such as customers, clients, suppliers, or visitors.

Inclusion and Belonging

Our world-class team thrives because we each bring our own unique experiences and perspectives to our work. *Diversity Makes Us Stronger* is one of our Core Values, and diversity of thought makes our Company stronger. At Cooper Standard, we provide equal opportunities to our team members and prohibit unlawful discrimination and harassment of any kind.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Make employment decisions, including performance evaluations or whom to hire and promote, based on skills and experiences.
- Never treat someone differently because of their looks, where they come from, their religion or any other characteristic protected by applicable law.
- Are inclusive and value the thoughts and opinions of coworkers who may have experiences and perspectives different from our own.

Characteristics Protected by the Law: What Are They?

There are laws that protect individuals from discrimination based on certain traits or characteristics. These characteristics should never come into play when we make employment-related decisions. They include:

- Race, skin color, or national origin;
- Sex, pregnancy, gender identity, or sexual preference;
- Religious beliefs or creed;
- Age;
- Physical or mental disability;
- Genetic information;
- Marital or civil partner status;
- Military or veteran status; and
- Any other characteristics protected by applicable state or local law.

INTEGRITY ALWAYS IN OUR WORKPLACE

A Safety First Workplace

Cooper Standard is committed to providing a safe, respectful and secure workplace for all team members. We will not tolerate violence, threats of violence, or physical intimidation in the workplace. We depend on our team members to be responsible, look out for their coworkers' safety, and support our Core Value of *Safety First* by maintaining a Total Safety Culture. We expect the same standard of safety from our suppliers.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Never treat someone in an intimidating, threatening, or physically aggressive way.
- Do not bring weapons, including lawfully licensed firearms, inside Company facilities or possess them while on Company business, attending Company-sponsored events or while in Company-provided vehicles. Except as expressly permitted by applicable law, do not store firearms in any vehicle located on property owned, leased, or controlled by the Company.
- Never cause physical injury to another person.
- Never come to work under the influence of impairing substances, including illegal drugs, alcohol, marijuana, controlled prescription drugs and non-prescription medications that could interfere with your ability to perform your job safely and efficiently.
- Understand that anyone suspected of possessing alcohol, a drug that is illegal under any applicable law, or a controlled substance during working hours is subject to inspection and search, with or without notice. This applies while on Company premises during work hours, or at any other location while conducting business on behalf of Cooper Standard.
- Report behavior that seems suspicious, unsettling, or threatening to one of our Ethics Reporting Resources. Even if made in a seemingly joking manner, words or actions that make you feel unsafe need to be disclosed. If you, or someone you know, is in immediate danger call local law enforcement authorities immediately. Then report the incident to your supervisor or manager, or by using any of the [Ethics Reporting Resources](#).



TOTAL
SAFETY
zero incidents **CULTURE**



TOTAL SAFETY CULTURE: IT'S WHAT WE DO

Our Total Safety Culture is everyone's responsibility. And working in this culture requires us to take actions even beyond following our policies and regulations.

- Watch for and report unsafe situations.
- Use tools and equipment safely.
- Follow work instructions, including use of required personal protective equipment.
- Report any behavior that seems suspicious or dangerous.
- Don't use, possess, or be under the influence of illegal drugs, alcohol, or any other substance that could impair your ability to perform your job safely and efficiently at work.
- Don't work while impaired.
- Don't attack, harm, or threaten others.

We are counting on you: If you see these or any other violations of our Code, please contact one of the [Ethics Reporting Resources](#).



INTEGRITY ALWAYS IN OUR WORKPLACE

Fair Wages

At Cooper Standard, we follow all laws and honor all agreements to which the Company is a party concerning working hours, wages and benefits, and we expect the same of everyone with whom we do business.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Make sure everyone working at Cooper Standard knows the terms of their employment, including what is expected of them and what rights they have.
- Never force people to work beyond the maximum hours as required by law.
- Ensure team members have the holiday and rest hours required by law.
- Ensure team members are paid wages in accordance with applicable law and meet the minimum wage as required by law.
- Ensure that our suppliers also follow the laws on hours and wages.

Protection of Assets

As a part of your job, you have access to many Company assets, including our facilities, equipment, materials, property, telephones, computers, email, the internet, information and intellectual property. Integrity requires that we use these assets for legitimate business purposes only.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Use Company assets for Company business.
- Never take, borrow, or knowingly misappropriate Cooper Standard assets, including any proprietary or confidential information of the Company, for our own use, the use by another, or for an improper or illegal purpose.
- Protect our assets from loss, damage, theft, unauthorized or improper use, and waste.
- Communicate professionally and thoughtfully.
- Complete expense reports accurately, honestly and timely.



INTEGRITY ALWAYS IN OUR WORKPLACE

Financial Records and Statements

Our customers, our shareholders, and the public at large trust us to report financial information about our Company truthfully and transparently. When we present financial information about the Company, we need to be sure that our reports accurately, fairly and completely reflect the financial state of our Company and its business transactions, while following all SEC requirements for disclosure and non-disclosure. At the same time, we must follow the principles of good accounting. Our Company has controls in place to ensure the integrity of our records and financial statements.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Record all transactions accurately, completely, and in a timely manner.
- Never intentionally make a false or misleading statement or require someone else to make a false statement on our behalf.
- Do not leave relevant information out of records.
- Report all expenses accurately and provide truthful supporting documentation.
- Cooperate fully with internal and external auditors, and report all required information fairly, completely and accurately.
- Never seek expense reimbursement for personal benefit or use Company accounts for personal purchases.
- Immediately report any concerns about expense reports, transactions and financial reporting to the legal department, internal audit or one of our [Ethics Reporting Resources](#).

Fraud: What is it?

Fraud is any action that is misleading or dishonest, either by team members or outsiders. Fraud destroys an individual's or company's reputation for trustworthiness. It can hurt our suppliers, our customers, our Company, and our team members. If you suspect fraud or are uncertain about the intent of a request from a supplier or customer, we need you to speak up immediately to internal audit or one of our Ethics Reporting Resources. The sooner we know about an issue, the sooner we can work to resolve it.

Fraud can take many forms, including:

- Creating false financial records or changing them dishonestly;
- Making it look like a product has been delivered when it has not, or making it look like more of a product was shipped than actually was;
- Claiming a product has a feature that's not fully developed or that does not really work as you describe it;
- Time reporting or payroll records manipulation;
- Representing that a quality check has been completed successfully when it has not;
- Completing an expense report and seeking reimbursement for a dinner with friends that did not involve work; and
- Submitting a fake receipt or supporting documentation with an expense report.

See our [Global Travel and Expense Reimbursement Policy](#), [Gifts and Entertainment Policy](#) and [Anti-Corruption Policy](#) for more information.

INTEGRITY ALWAYS IN OUR WORKPLACE

Records Management

The records we create must clearly and accurately reflect our intentions, decisions and transactions. We create professional records and manage them carefully, in accordance with Cooper Standard's record management policies and applicable law.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Remember that emails, texts, letters and other communications become part of the Company record. Communicate courteously and professionally.
- Use only Company-provided devices, messaging services and applications (together, "systems") when engaging in substantive business communications electronically.
- Follow our Company's records retention schedule, retaining records for the designated time period and disposing of them properly when the retention period has expired.
- Follow directions from the legal department if there is a request to hold records for a longer period than normal, such as when a litigation or legal hold is issued.



Substantive Business Communications: – What are they?

A Substantive Business Communication is any important business-related communication which contains business plans, decisions, policies or positions, documents a transaction or other Company business, and has business value, or is required to be retained due to legal, accounting or other regulatory requirements. Some examples include:

Internal Communications regarding:

- Employee performance and attendance matters
- Sensitive information about team members or applicants
- Company expenses, approvals, etc.
- Company financials, strategies, new business wins, budgets, settlements or new product lines

External Communications:

- With existing or potential customers, suppliers or other business partners regarding existing or new business, requests to quote, changes in price, delivery or other contract terms, etc.
- With vendors, consultants or advisors regarding projects, investigations and settlements
- With investors, shareholders or any external party requesting Company information.

Consult our [Record Retention and Destruction Policy](#) and [Electronic Business Communications Policy](#) for additional information.

INTEGRITY ALWAYS IN OUR WORKPLACE

Information Systems

Our information and communication systems are essential tools that help us work effectively and efficiently. It's especially important that we use good judgment and follow Company policies whenever we use these systems.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Conduct ourselves appropriately, ethically, and within the law when using our Company's information systems.
- Remember that our information technology systems, electronic communication systems, and all the data and information they contain are Company property. This includes all information, messages, and correspondence, including personal information and correspondence, which are created, sent through, received by, processed, accessed, or stored within our electronic mail or voicemail accounts. It also includes the information you create, send, receive, process, access, or store on Company systems or technology such as laptops, phones, and other systems and devices.
- Use Company systems primarily for business purposes and only for personal reasons when it does not impact your ability to do your job, interfere with Company business, or otherwise violate our Code of Conduct.
- Use only Company systems when conducting substantive (important) business communications and for the creation and retention of business records.
- Do not use personal email accounts, SMS/text messaging, or third-party messaging apps (such as WeChat, WhatsApp or equivalents) when conducting substantive business communications electronically.
- Use strong passwords, and never share them, not even with a coworker.
- Only click on links or open email attachments from senders you trust.
- Never use Company systems to review or send material that is inappropriate, harassing, or offensive; or to do anything that disparages the Company, its products or services, customers, or team members.
- Remember that the Company has the right to block access to websites, restrict the transmission of files, and may inspect or monitor all use of systems or devices owned, leased, or controlled by the Company, in accordance with applicable laws, and that you should have no expectation of privacy in information created, sent, received, processed, accessed, or stored on Company systems or devices.
- Follow our information security policies to protect our data and information systems

For more information on protecting our data and information systems, consult our [Acceptable Use Policy](#), [Electronic Business Communications Policy](#) and other IT policies located on the [IT CSOS page](#).

INTEGRITY ALWAYS IN OUR WORKPLACE

Phishing: What is it?

Protection of our critical infrastructure and technology is a responsibility we all share. Phishing is the fraudulent practice of sending emails pretending to be from reputable companies in order to trick individuals to reveal personal information, such as passwords and account numbers and can introduce malware into our Company computing networks. If you receive a suspicious email, immediately report it by clicking on the "Report Message" button on your Microsoft Outlook toolbar or forwarding to cybersecurity@cooperstandard.com.

Suspect a cybersecurity issue? Create a [CS Service Station](#) ticket and contact cybersecurity@cooperstandard.com and your local IT representative.

Conducting Electronic Business Communications the Right Way:

For legal or contractual reasons, or because it is valuable to the Company, important (substantive) business communications must be preserved and accessible by the Company. When such communications are conducted electronically, it is critical that team members use only Company-provided systems to ensure that the Company can secure, preserve, access and produce these communications.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Use only Company systems – devices, messaging services, and apps such as Teams, SharePoint, Outlook and CS Connect – when conducting substantive business communications electronically.
- Never use personal email accounts, SMS/text messages or third-party messaging apps (such as WhatsApp, WeChat or equivalents) when conducting substantive business communications electronically.
- In the event a substantive business communication is started on a non-Company system, team members must move such communication threads onto a Company system as soon as possible and retain those communications in accordance with our [Records Retention and Destruction Policy](#) and other legal obligations (such as legal holds).

For examples of substantive business communications and how to retain such communications, please consult our [Electronic Business Communications Policy](#).

Contact IT for guidance and approval if you have been asked to use a method of electronic communication that is not addressed in our Policy.

Conflicts of Interest

Integrity requires that directors, officers and team members should always act in the best interest of the Company. There may be times when our personal relationships, interests or activities can get in the way of the interests of Cooper Standard. These personal interests may be our own or those of our family members or close friends. Sometimes those personal interests may only appear to get in the way of the Company's interests. All of these can be conflicts of interest, and when they arise, it is very important that the Company know about them.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Understand how to identify and avoid conflicts of interest.
- Make business decisions based on the best interests of the Company.
- Do not allow relationships with suppliers, customers, competitors, or others involved in the business of Cooper Standard to affect our independent and sound judgment.
- Never accept lavish or inappropriate personal benefits beyond standard marketing items or hospitality (or allow your family members or close personal friends to accept such benefits) as a result of your job at Cooper Standard.
- Disclose any conflicts of interest or potential conflicts of interest to the Chief Compliance Officer immediately.

CONFLICTS OF INTERESTS: APPEARANCES MATTER

There are certain things we simply must not do because they create conflicts of interest, or they look like conflicts of interest.

- Accepting loans, for ourselves or our family, from the Company or from anyone who does business with or wants to do business with the Company.
- Supervising, indirectly or directly, family members or people with whom we are in a romantic relationship.
- Owning a company or part of a company or having a personal relationship with a company that does business with, wants to do business with, or competes with Cooper Standard.
- Taking personal advantage of opportunities that we learn about through working at Cooper Standard.
- Using Company property or information for personal benefit or outside activities, such as volunteer work or charitable board service, without specific prior authorization by the Chief Compliance Officer.
- Allowing outside work to interfere with our job responsibilities at Cooper Standard.

We're counting on you: If you see these or any other violations of our Code, please contact one of our [Ethics Reporting Resources](#).

For guidance and more information on how to recognize, disclose, or report an actual or potential conflict of interest, please review our [Conflict of Interest Policy](#). See also our [Anti-Corruption Policy](#) and [Gifts and Entertainment Policy](#) for additional information on properly offering or accepting gifts or other benefits.

INTEGRITY ALWAYS IN OUR WORKPLACE

Confidential Information

Our customers, our business partners, and our team members trust us to keep confidential information safe. This requires all of us to handle confidential information carefully and guard it diligently at all times.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- › Do not share confidential information with others who do not need it to do their jobs.
- › Contact the legal department or your local human resources department before sharing confidential information outside the Company.
- › Never leave confidential information where it can be seen by someone for whom it is not intended, such as on a computer screen or a photocopy machine, or in a shared area.
- › Do not discuss confidential information in a public place where someone could hear your conversation.
- › If you receive confidential information in error that is not intended for you, report it to the legal department as soon as possible, and do not forward or use such information in any way.
- › Immediately inform a supervisor or the legal department of any inadvertent disclosure of confidential information.
- › If you are working under a confidentiality (or non-disclosure) agreement, be sure to comply with the terms of that agreement and contact the legal department if you have questions or concerns.
- › Unless you have confirmed that you are permitted to do so, never disclose to business partners the names of our other customers or suppliers or the projects we are working on with other parties.
- › Do not share financial information that has not already been released publicly outside the Company.

Confidential Information: What is it?

Confidential information is any non-public, confidential, or proprietary information about the Company, our customers or our business partners that has not yet been released to the public. It includes, by way of example and without limitation:

- Business strategies or plans;
- The financial condition of the Company;
- Company financial information not formally published;
- Technology, processes, and systems;
- Intellectual Property – our own and our customers’;
- Contractor, vendor or supplier non-public information shared with the Company;
- Cost or pricing information;
- Information about our products and product strategies; and
- Personal non-wage information about team members.

Understanding Information Classification

Not all Company information is created equal; it must be handled according to its value and classification. At Cooper Standard, all Company information is classified into one of three different confidentiality levels (from least to most sensitive), with different labeling and handling requirements for each.

Our information classifications are:

- **Public:** Company information which may be broadly distributed without causing damage to the Company, team members or other stakeholders;
- **Internal:** All Company information that is not Public and is not Restricted; and
- **Restricted:** Sensitive or valuable Company information that is not otherwise publicly available, or which may cause serious and potentially irreparable harm to the Company, its customers, suppliers or team members if disclosed or used in an unauthorized manner.

At Cooper Standard, both Internal and Restricted information is considered “Confidential Information.”

See our [Confidentiality and Information Classification Policy](#) for examples and more details about classification criteria, labeling requirements and other handling protocols, and who to contact with questions.

INTEGRITY ALWAYS IN OUR WORKPLACE

Intellectual Property and Trade Secrets

When we innovate, we create the best products and services for our customers. Our intellectual property (IP) and trade secrets give us a competitive advantage, so it is vital that we safeguard and protect them at all times. We also need to protect the intellectual property rights of all third parties with whom we work.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- › Understand how to identify our intellectual property and trade secrets and how to protect each.
- › Treat all trade secrets as confidential and protect them from disclosure.
- › Do not share any trade secrets or confidential information outside of the Company unless an appropriate non-disclosure agreement is in place.
- › Protect our own intellectual property and that of our business partners.
- › Follow our branding policy when using Company trademarks and other brand identifiers.
- › Honor our obligations pursuant to any non-disclosure agreement or other contractual obligation, and follow similar procedures when handling our own information.
- › Use confidential customer information only for the purpose the customer specifies.
- › Purchase or license all commercial software, and do not copy commercial software unless the software license expressly permits copying.
- › Do not use unethical or illegal means to obtain a competitor's confidential information.
- › Keep confidential information learned from previous employment with a competitor confidential; continue to protect our confidential information even after your employment with Cooper Standard ends.
- › Seek guidance from the legal department if you have any questions about whether something should be treated as intellectual property or a trade secret.
- › Work with suppliers who also respect intellectual property.

Intellectual Property: What is it?

Our patents, copyrights and trademarks protect our innovations and maintain the reputation of our brand. A strong IP portfolio can also generate income for the Company through licensing rights, help us in negotiating collaborations and joint ventures, and attract investors.

By protecting our IP, we can stop others from stealing or copying:

- Our products;
- Our brand names;
- Our inventions;
- The design or specifications of our products; and
- Things we write, make, or produce.

INTEGRITY ALWAYS IN OUR WORKPLACE

Trade Secret: What is it?

Our trade secrets are any of our technical or other confidential information that is not generally known to our competitors and because of this, provides a competitive edge for the Company. To retain this business advantage, it is vital that we take steps to maintain their secrecy at all times. Some examples of our trade secrets include:

- Recipes of our material compounds;
- New product research and development;
- Customer lists;
- Confidential processes and know-how; and
- Strategic plans.

If you suspect any infringement on our intellectual property rights or unauthorized disclosure or misuse of our trade secrets, you must report it to your manager, the legal department or any of our [Ethics Reporting Resources](#).

For additional information on protecting our intellectual property and trade secrets, see our [Confidentiality and Information Classification Policy](#).

Generative AI

At Cooper Standard, we value the responsible use of Generative Artificial Intelligence (GenAI) as a tool that enhances our business operations, enables our team members to more efficiently perform tasks, and helps us to meet customer expectations. Our commitment to *Integrity Always* requires that our use of GenAI via platforms, tools, and software on behalf of the Company must be ethical and consistent with our Code, other Company policies, and applicable law.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Validate in meetings with an external host that no external note-taking bots are attending as meeting participants. Ask the meeting host to disable the bot, or reschedule the meeting to be hosted by Cooper Standard;
- Use only authorized GenAI tools for authorized use cases;
- Obtain written authorization from the IT department by contacting genai@cooperstandard.com before using other GenAI tools or using GenAI for other use cases;
- Use Company-authorized GenAI tools for business purposes only;
- Limit use of Company-authorized GenAI tools to Company devices;
- Never enter any Company confidential or proprietary information into the prompt of any non Company-authorized GenAI application;
- Never use GenAI tools to conduct illegal activities; and
- Thoroughly review all GenAI outputs before using them.

Please consult our [Generative AI in the Workplace Policy](#) and [Messaging Policy](#) for additional information on disclaimers, record-keeping and other requirements, and prohibited uses.

INTEGRITY ALWAYS IN THE MARKETPLACE

- Marketing Materials
- Personal Data Protection
- Careful Communications
- Social Media
- Product Quality
- Antitrust and Fair Competition
- Gifts and Entertainment
- Anti-Bribery and Anti-Corruption
- Trade Controls
- Anti-Money Laundering
- Insider Trading and Fair Disclosure

INTEGRITY ALWAYS IN THE MARKETPLACE

Marketing Materials

Our commitment to integrity requires us to always build and maintain trust with our customers. We never advertise our products in a way that is unfair, deceptive, or misleading.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Help our customers make informed decisions by sharing truthful and accurate information about our products.
- Never mislead a customer or hide information in order to win business.
- Never provide false information about our competitors' products and services.

Personal Data Protection

At Cooper Standard, we respect the privacy and data of our customers, suppliers, coworkers and everyone else with whom we do business, and we expect our suppliers to do the same. This means following the laws that tell us how we must handle personal information. It also means protecting all personal information that we collect, process, transfer and store.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Comply with all applicable data protection and privacy laws, including requirements to notify the right people of a data breach.
- Never share personal information about team members, customers, vendors, or other business partners without permission.
- Protect the personal information entrusted to us (such as performance management documents, salary information, expense reports, or medical information) and store it only in a secure location to prevent access by an unauthorized person.
- Never access personal information about anyone if you don't need it to do your job.

Personal Information: What is it?

Personal information is any information that can help identify an individual. It could be in any format — paper, electronic, or even spoken out loud — and can include full names, addresses, email addresses, telephone numbers, credit card information, birthdates, national identification numbers and more.

Non-Public Information: What is it?

Just as we need to protect the personal information of individuals, we need to protect nonpublic information about the Company, including intellectual property, financial information not formally released in our financial filings, and other material information about the business. For a detailed understanding, see the Code sections on [Confidential Information](#), [Intellectual Property and Trade Secrets](#) and [Insider Trading and Fair Disclosure](#) and consult our [Confidentiality and Information Classification Policy](#).

Do not share in any way, including on social media channels, the following without prior written authorization from the legal department or authorized Company representative, including the Global Communications Department:

- Business strategies or plans;
- The financial condition of the Company;
- Earnings figures and trends;
- Changes in key management;
- Important information on lawsuits;
- Acquisitions and sales;
- Technology, processes and systems;
- Information about our products and product strategies;
- Personal non-wage information about team members; and
- Confidential processes and know-how.



Careful Communication

Our customers, our investors, and the public count on us to share truthful and accurate information about our Company. That's why only certain individuals have the authority to speak on Cooper Standard's behalf. This ensures our messages will be accurate and consistent, and issued by an authorized Company representative.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Do not communicate with or send any information to the media, investors or the public, including on social media channels, without permission from the Global Communications Department to speak on behalf of Cooper Standard.
- Gain approval of the Global Communications Department to be included in supplier testimonial stories.
- When speaking at conferences, industry meetings, etc., be sure to clarify that your remarks and comments are your own, unless you have been specifically authorized by the Global Communications Department to speak on behalf of the Company.
- Follow our [Social Media Policy](#) when mentioning the Company on your personal accounts.
- Understand that the use of social media to disclose material, non-public information about the Company is considered selective disclosure, which is strictly prohibited by the law and our policies. See our Code sections on [Insider Trading and Fair Disclosure](#) for more information.

INTEGRITY ALWAYS IN THE MARKETPLACE

Social Media

In our professional and personal use of social media when it relates to the Company we need to be smart and thoughtful. Nothing we say or do online should harm our Company, customers, suppliers, or team members.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Communicate professionally and respectfully.
- Remember that you and only you are responsible for what you post online.
- Remember that you have no expectation of privacy when using Company systems and devices and that the Company may inspect and monitor all activity on its systems and devices.
- Use it responsibly: disparaging or offensive material is prohibited.
- Use it at work only if it does not interfere with our work or take up an unreasonable amount of time.
- Never share confidential or nonpublic information about Cooper Standard, our customers, or our suppliers. Respect others' privacy and do not share their records or documents online without permission.
- Never use non-Company provided apps such as WeChat or WhatsApp for exchange of business-related communications or attachments.
- When discussing Company or industry-related topics in your personal profile or posts, include a disclaimer that you are not speaking on behalf of the Company.
- Bring to management's attention any negative posting about the Company so we can protect our brand and customer relationships.
- Remember team members are not authorized to comment or post anything on behalf of Cooper Standard. Only the Global Communications Department and designated parties are allowed to post official Company communications. All Cooper Standard social media channels must also be approved by the communications department.

Social Media: What is it?

When we say "social media," we mean all online interactions, including social networks, blogs, comments, chatrooms, apps and websites. Our Code of Conduct applies to the words and images we post, as well as to reposts and reactions to other people's posts.

For a detailed understanding, please reference our [Social Media Policy](#).



SOCIAL MEDIA

BE RESPECTFUL, HONEST AND CAREFUL

Using social media responsibly means thinking about how your posts could affect those around you. Are your words rude, disparaging, or unbusinesslike? Could you carelessly disclose confidential or proprietary information? Never speak on behalf of the Company without permission from the Global Communications Department.



RED LIGHT NEVER SHARE

- Statements that are rude or discourteous.
- Confidential or proprietary information about the Company, its customers, or suppliers.
- Personal non-wage information about another team member or supplier.
- Intellectual property belonging to Cooper Standard or a third party.



YELLOW LIGHT THINK BEFORE SHARING

- Any post that might be perceived as reflecting poorly on the Company's brand or values or as harmful to the reputation of the Company, its customers, suppliers, or team members.
- Photos of you wearing Company merchandise or in a Company facility that might accidentally share confidential information.



GREEN LIGHT OKAY TO SHARE

- Personal stories that involve you alone.



INTEGRITY ALWAYS IN THE MARKETPLACE

Antitrust and Fair Competition

We earn business through the quality and value of our world-class products, not through unfair business practices. There are many laws around the world, including U.S. antitrust laws, which are designed to protect customers and keep markets competitive. These can be complex and can vary from country to country. We comply with these laws at all times, no matter where we are conducting business, and expect our suppliers to do the same.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Avoid contact with team members of our competitors, except in the limited situations where it is necessary and for reasons allowed by law.
- Never discuss competitively sensitive information with competitors, including prices or price-related information, information related to bids or proposals, the division or allocation of markets, or our business dealings with any third party.
- Honor non-disclosure agreements of team members who previously worked for a competitor.
- Never make an agreement with a competitor that could restrict competition.
- Gather information about competitors fairly and through the proper channels, never through bribery or theft.
- Be especially mindful of rules and policies that govern competition laws when attending trade association meetings.
- Contact the legal department if approached about entering into any agreement with a competitor.

Prohibited Agreements — What Are They?

Prohibited agreements aim to restrict fair competition, and violate international agreements and our Company's commitment to integrity. These include:

- Agreements to fix or maintain prices;
- Agreements about pricing terms or other conditions of sale;
- Agreements about who can sell to certain customers, in certain territories, or in certain product lines; and
- Agreements to refuse to deal with a certain supplier or customer.

Consult our [Antitrust Policy](#) for additional guidance on interacting with customers, suppliers and competitors.

Product Quality

At Cooper Standard, *Commitment to Excellence* is one of our Core Values. The integrity of our products is extremely important to us and to our success. We provide our customers and business partners with safe, high-quality products. We have procedures and controls in place to ensure that we comply with all applicable federal and customer safety and quality requirements. We will work only with suppliers that guarantee the quality of their products and services, and we hold our suppliers accountable to our high standards.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Understand and comply with the requirements and controls that apply to our job responsibilities.
- Follow all product specifications.
- Adhere to production processes and quality-control procedures.
- Prioritize our commitment to the integrity and quality of our products whenever we choose suppliers.
- Speak up if we have concerns that a product or service does not comply with applicable laws, procedures, or internal controls.
- Do everything in our power to keep counterfeit products out of our supply chain.
- Ensure the accuracy and integrity of all testing data.

Our [Quality Policy](#) summarizes our commitment to world-class quality.

INTEGRITY ALWAYS IN THE MARKETPLACE

Gifts and Entertainment

At Cooper Standard, we recognize that appropriate gifts and entertainment can help develop professional relationships, and we expect our team members to use common sense and good judgment. Giving or accepting gifts or entertaining people must never compromise or even appear to compromise our ability to make sound, objective business decisions.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Do not give or accept gifts or entertainment unless they are related to a clear business purpose;
- Do not give gifts to influence a business decision. Do not accept gifts if you suspect someone is trying to influence your decisions.
- Do not offer or accept gifts or entertainment during active negotiations with an existing or potential customer or supplier;
- Record all gifts provided in expense reports, in compliance with Company policy.
- If you feel uncomfortable declining a gift or worry that you might offend the person offering it, speak with your supervisor.
- Always ask your supervisor if you are unsure whether certain gifts or entertainment are appropriate.
- Disclose any offer or receipt of a gift or entertainment over a nominal amount to your functional leader, Vice President or direct supervisor for approval.
- Gifts and entertainment must:
 - Be legal under local law and consistent with accepted business practice;
 - Be of nominal value;
 - Be in good taste;
 - Be infrequent;
 - Be unsolicited;
 - Not be in the form of cash or cash equivalents; and
 - Not embarrass you or the Company if they were publicly disclosed.

Government Officials

Hospitality and gift-giving to Government Officials must be approached with caution, as such hospitality or gift-giving may be perceived as seeking to obtain an improper benefit from the Government Official (such as offering a bribe). Unlawful payments in the form of gifts or entertainment to Government Officials can result in severe consequences for both the Company and you. Unless a Company policy deviation in the country where you conduct business provides otherwise, any offer of a gift or entertainment to a Government Official requires the written pre-approval of the Company's Chief Compliance Officer.

The definition of Government Official is broad and includes:

- Elected officials;
- Any person acting on behalf of a Government Official, agency or enterprise that performs a government function;
- Any political party or person acting on its behalf;
- Any candidate for public office;
- Any person acting on behalf of a public international organization;
- Team members of wholly or partially government-owned or controlled entities; and
- The family members, relatives or close business associates of the above.

GIFTS AND ENTERTAINMENT

GIVE THE RIGHT GIFTS THE GREEN LIGHT

Seek guidance before giving or receiving things of value, especially if you are in doubt as to whether the other party is a Government Official or employee.

Consult our [Gifts and Entertainment Policy](#), [Anti-Corruption Policy](#), [Travel and Expense Reimbursement Policy](#) and any local policy deviations for additional guidance on providing gifts and entertainment, including monetary limits, required pre-approvals and proper recording of all gift and entertainment expenses.



RED LIGHT

THESE GIFTS ARE *NEVER* OK

- Cash or cash equivalents such as gift cards, loans, or stock;
- Luxury items of high value (such as designer brands, sporting equipment, and liquor);
- Extended trips or outings;
- Entertainment that could be perceived as inappropriate; and
- Gifts or entertainment that violate the recipient's gift policies.



YELLOW LIGHT

THESE GIFTS ARE GENERALLY *NOT* OK

- Expensive tickets to a sold-out concert or playoff sporting event;
- A basket filled with bottles of wine; and
- A luxurious weekend away for or with a customer.



GREEN LIGHT

THESE GIFTS ARE GENERALLY OK

- Reasonably priced meals where business is discussed;
- Promotional items such as pens, mugs, or calendars;
- Perishable items (such as gift baskets and holiday cookies) intended to be shared among team members; and
- A small flower arrangement to commemorate a holiday or special occasion.



INTEGRITY ALWAYS IN THE MARKETPLACE

Anti-Bribery and Anti-Corruption

We win business with the integrity of our products, services and team members. No matter where and no matter with whom we are doing business, we do not offer or accept bribes. This applies to our team members around the world, our suppliers, and to anyone doing business on our behalf.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Never offer payment, authorize a payment, or offer anything else of value to influence a business decision, obtain or retain business, or secure an unfair advantage.
- Follow the gifts and entertainment requirements as explained in the previous section and in our Gifts and Entertainment Policy.
- Never personally accept cash or cash equivalents from a supplier or customer.
- Ensure our team members never use their relationships with suppliers for their personal benefit.
- Monitor the people who work for us, including agents who aren't directly employed by Cooper Standard, and remember our Company can be held responsible for their actions.
- Record all transactions and payments accurately and truthfully. Never hide or attempt to hide a payment.
- Keep in mind that special rules apply when we deal with government team members and officials and seek guidance from the legal department when doing so.

Facilitation Payments: What Are They?

Facilitation payments are small sums of money paid to a lower-level government official to speed up or more easily facilitate certain routine business tasks, such as moving products through customs or obtaining a permit, license, or other official document. While legal and common in some countries, they are illegal in many others. Our Code and Anti-Corruption Policy prohibit these payments.

Our top priority is the health and safety of our team members. If extortion payments are demanded and there is a reasonable belief that the health and safety of Company personnel or others are at risk, such payments are permitted. Any such payments must be reported immediately to the Company's Chief Compliance Officer or Global Ethics and Compliance Committee and recorded accurately in the Company's books and records.

For additional information on our commitment to conducting business free of bribery and corruption, see our [Anti-Corruption Policy](#), [Travel and Expense Reimbursement Policy](#) and [Gifts and Entertainment Policy](#).

BRIBERY: WHAT TO WATCH FOR

Bribery is defined as giving or offering something of value to a decision maker in order to influence or reward a favorable business outcome. We always avoid any actions that could look like bribery — and that includes actions taken by third parties working on behalf of the Company in any capacity.

If you're working with a third party, watch for these bribery red flags:

- Evidence of personal connections to clients or prospects;
- Unclear expenditures that might be a way of disguising a personal benefit;
- An unexplained (or poorly explained) increase in “commissions” or “marketing fees”;
- Adding more people (like consultants or subcontractors) to a deal with no clear description of what they’ll be doing; and
- Contributions to local charities or the community (schools, parks, etc.).

We are counting on you: If you see these or any other violations of our Code, please contact one of the [Ethics Reporting Resources](#).

INTEGRITY ALWAYS IN THE MARKETPLACE

Trade Controls

Governments everywhere regulate how companies like ours buy and sell goods and services across international borders. As a global company, we and our suppliers need to understand and follow the rules about importing, exporting, and related activities everywhere we work. We honor our obligations under these rules and trade with integrity.

These rules can be complicated and fast-changing, and vary from country to country, but they are critical to protecting national security. Violating them can lead to heavy penalties for our Company and significant damage to our reputation. It's also important to remember that anyone working on our Company's behalf must also follow these rules.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Understand the rules related to importing and exporting when doing any work that moves goods, services, software or technology across country borders.
- Make sure any information provided to government authorities is truthful and accurate.
- Follow our due diligence process for screening potential customers, suppliers and other third parties.
- Do not conduct business with countries, regions, entities or individuals sanctioned by the U.S. government or other countries where we operate..
- Remain aware of the "restricted parties" lists that show us with whom we cannot conduct business.
- Watch for language in contracts, purchase orders, or shipping documents that may violate anti-boycott laws. If you see this language, report it to the legal department immediately.

Trade Controls: What Are They?

Import and Export Controls: There are many regulations and restrictions on the import and export of our products, services and technologies. Special restrictions apply to products that could be used by the military.

Anti-Boycott Laws: In the United States, it is illegal to support a boycott of a foreign country if the United States does not recognize the boycott.

Economic Sanctions and Embargoes: The laws of the United States and other countries where we work make it illegal to trade with certain countries and individuals. If you believe that you may be working with a restricted person or in a restricted country, contact the legal department immediately.

Anti-Money Laundering

Our commitment to integrity requires that we conduct business only with customers who are involved in legitimate business activity and whose funds originate from legitimate sources. Money laundering is the process of exchanging funds obtained criminally for funds that are "clean" in order to make the funds appear legitimate.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Comply with applicable laws that combat money laundering and terrorist financing.
- Know who is behind every transaction and practice due diligence about the identity and economic background of business partners.
- Pay close attention when the transaction involves cash payments.
- Ensure payments come from legitimate sources.
- Report any suspicious activities and transactions to the legal department.

INTEGRITY ALWAYS IN THE MARKETPLACE

Insider Trading and Fair Disclosure

There are many benefits and obligations that come with being a publicly traded company. Our legal and ethical obligations require us to ensure the proper disclosure of material Company information that is not yet known to the public. The law and our policies strictly prohibit insider trading and the selective disclosure of material, non-public information.

There may be times when you learn something about Cooper Standard or one of our business partners that is not public and is important in making an investment decision regarding the Company's stock. It is against the law to buy or sell stocks based on that information or to give someone else a tip based on that information. It is also against the law to disclose material non-public information only to certain individuals – such as stock analysts or institutional investors – before such information has been disclosed to the general public.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- › Understand the insider trading and selective disclosure laws as well as our applicable policies and procedures and know how they apply to you.
- › Do not purchase or sell stock if you have material, non-public information.
- › Do not provide a tip to anyone or encourage anyone to purchase or sell stock based on material, non-public information.
- › Understand that the use of social networks (such as blogs and social media) to disclose material, non-public information is considered selective disclosure.
- › Understand where to report any leak or disclosure (intentional or unintentional) of material, non-public information about the Company.
- › Direct all inquiries from securities analysts, broker-dealers or other investors to the Company's Director of Investor Relations.

Material Information: What is it?

Material information is any information that a reasonable investor would consider important when they are deciding whether to buy, sell, or hold stock. This includes information about:

- Unpublished earnings information, including annual or quarterly financial results and guidance or projections relating to future earnings performance;
- Significant changes in sales volumes;
- A significant pending or proposed merger, acquisition, divestiture or tender offer, or joint venture;
- A pending or proposed purchase or sale of a significant asset;
- Significant technological developments;
- The addition or loss of a major customer or supplier or product program;
- Changes in executive leadership;
- Significant litigation developments;
- Restructuring or layoffs;
- Changes in auditors; and
- Planned stock splits or dividends.

For questions regarding the materiality of certain information, or to report an intentional or unintentional disclosure, please contact the legal department. See our [Securities Trading Policy](#) and [Regulation Fair Disclosure \(FD\) Policy](#) for additional information.

INTEGRITY ALWAYS IN THE GLOBAL COMMUNITY

- Charitable Donations
- Care for Our Surroundings
- Respect for Human Rights
- Political Participation



Charitable Donations

At Cooper Standard, being a good community partner is an important part of our culture. We are driven by our desire and responsibility to support the communities where we work and live. As a responsible corporate citizen, we contribute to registered charitable organizations through our foundation. The [Cooper Standard Foundation](#) is governed by a philanthropic committee and board of trustees.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Ensure charitable contributions are not connected in any way to specific purchases or commitments.
- Ensure that all contributions are made ethically and responsibly.
- Ensure contributions are used to strengthen the communities where our team members work and live, especially in the areas of children's charities, education, health and wellness and community revitalization.

INTEGRITY ALWAYS IN THE GLOBAL COMMUNITY

Care for Our Surroundings

As a responsible corporate citizen, integrity drives us to respect not only the teams we work with but also our communities and the natural environment.

Consult our [Policy on Global Human Rights](#), [Diversity, Inclusion and Belonging Policy](#), and [Corporate Responsibility Report](#) for additional information on how you can contribute to ensuring a more sustainable future for our Company, team members, customers and communities.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Know and understand the environmental, health, and safety laws that apply to our work, wherever we do business.
- Work to ensure that our vendors, suppliers and contractors conduct their activities safely and responsibly and follow the [Supplier Code of Conduct](#). We may do this by providing them with education and training.
- Perform reasonable country of origin investigations (RCOI) as necessary to ensure the minerals in our products are responsibly sourced.
- Treat team members with respect and dignity, and report discrimination, harassment or any violation of Company policies to one of our [Ethics Reporting Resources](#).
- Follow the laws and our internal policies that govern how we do business — and encourage our coworkers to do the same.



INTEGRITY ALWAYS IN THE GLOBAL COMMUNITY

Respect for Human Rights

At Cooper Standard, we are committed to protecting the safety, well-being and rights of all people with whom we interact, including our team members, communities, suppliers, customers and other business partners. We reinforce this commitment in our policies and our supplier expectations.

Additional information about our human rights commitments can be found in our [Policy on Global Human Rights](#), [Supplier Code of Conduct](#) and [Corporate Responsibility Report](#).

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Act with integrity in all our business transactions and have policies and controls in place to ensure that forced labor does not take place anywhere within our business transactions or relationships.
- Support freedom of association and the right to collective bargaining and expect our suppliers to do the same.
- Make sure to include language that prohibits all types of forced labor whenever we enter agreements with suppliers and business partners.
- Ensure third parties have gone through our due diligence and screening processes.
- Monitor these relationships and speak up when something doesn't seem right.

Political Participation

We encourage team members to participate in the political process by registering to vote and educating themselves about the issues. At the same time, individual team members must keep their political activity separate from their work at Cooper Standard. The Company also participates in the political process through advocacy and lobbying work and follows all the laws that apply.

INTEGRITY AND OUR CODE REQUIRE THAT WE:

- Obtain approval from the Global Communications Department and comply with all lobbying laws and regulations if undertaking political activity on the Company's behalf.
- Keep your personal political participation separate from your job at Cooper Standard and do not solicit political support or contributions for such causes.
- Do not use Company funds, facilities, or any other assets to support non-Company approved political candidates, parties, organizations, or other political causes.

INTEGRITY DRIVES US FORWARD

At Cooper Standard, our success — as a Company and as individuals — depends on our dedication to integrity. It defines how we do business, how we treat our coworkers and business partners, and how people see us around the world. You can do your part by following this Code of Conduct and speaking up if you see behavior inconsistent with the Code.

Ethics Reporting Resources

To make a report, ask questions, or express a concern, contact one of our Ethics Reporting Resources:

- Your supervisor or manager
- Any member of the human resources team
- The legal department or the Ethics and Compliance Office (ethicsandcompliance@cooperstandard.com)
- Any member of the Global Ethics and Compliance Committee (www.cooperstandard.com/ethics)
- The Cooper Standard IntegrityLine, anonymously if desired*, at www.CSIntegrityLine.com

**Please note that a few countries in which we operate do not allow anonymous reporting.*

Compliance with our Code of Conduct

At Cooper Standard, our commitment to our Core Value of Integrity Always, our Code of Conduct, Company policies, and the laws and regulations of the countries in which we conduct business is a competitive advantage that we are proud of.

Violations of any Company policy or the law may carry serious consequences. These include disciplinary action, up to and including termination, and possible civil or criminal liability. Our Company retains the right to administer disciplinary action in response to acts of misconduct. All officers and managers are responsible for the enforcement of our Code of Conduct, and for ensuring team members' knowledge of and compliance with its requirements. All team members, directors, and agents have the responsibility to fully comply with our Code. We also expect everyone working on our Company's behalf to adhere to our Code of Conduct, including consultants, agents, suppliers, and business partners. Our Chief Compliance Officer holds ultimate responsibility for the interpretation of this policy.

INTEGRITY DRIVES US

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