

Adient Germany Ltd & Co. KG. and its German subsidiaries (hereinafter „Adient“)

Human Rights Policy Statement for Germany Supply Chain Due Diligence Act

Adient is a global leader in automotive seating.

At Adient, we believe human rights are fundamental to society and imperative to the success of our business. We are committed to protecting the safety, well-being and human rights of all our people - including women, minorities and other protected groups. We value diversity and do not tolerate discrimination or harassment. We also believe access to clean water is a fundamental human right, and we are actively working to decrease our greenhouse gas (GHG) emissions and protect our natural resources, including our forests and water supply. We reinforce these commitments in our policies and in our supplier expectations.

Adient follows the Ten Principles of the UN Global Compact on human rights, labor, environment and anti-corruption, and we are committed to making the UN Global Compact and these principles part of the strategy, culture and day-to-day operations of our company.

This policy statement describes the essential steps and measures we take in the course of our business activities to identify and avoid potential human rights and environmental risks as defined in Sec. 2 (2) and (3) of the German Act on Corporate Due Diligence Obligations in Supply Chains (hereinafter "LkSG") (the "Risks").

We are committed to driving a safe, respectful, diverse and inclusive work culture where all our employees are valued, respected and empowered to always act with integrity. Our Ethics Policy is the foundational document that sets the standard for how we operate and how we reach our goals; it contains, among many things, our commitment to non-discrimination and freedom from harassment.

Adient employees are trained on our Ethics Policy and educated on how to report potential ethical violations or claims of harassment or discrimination without fear of retaliation. All complaints of alleged human rights violations, ethical concerns or claims of harassment or discrimination are investigated and appropriate disciplinary action is taken if necessary.

Each year, 99+ percent of our salaried employees in all our regions voluntarily certify their compliance with our Ethics policy. Additionally, policies such as our Competitive Behavior Standard and Anti-Bribery and Anti-Corruption Standard help guide our business partners.

We have implemented internal rules that integrate this commitment into our daily business.

Our publicly available policies and procedures reflect our commitment to respecting human rights:

- Ethics Policy and Integrity Helpline
- Global Supplier Standards Manual
- Supplier Code of Conduct
- Privacy Policy and Terms of Use
- U.K. Modern Slavery Disclosure Statement
- Conflict Mineral Policy Statement
- Sustainability Report

Whenever possible and applicable, we work with our stakeholders (e.g., employees, customers, investors, suppliers, etc.) to develop, implement and evaluate our policies.

Adient conducts appropriate risk analyses relating to human rights and our environment-related obligations in its business activity throughout all of its business areas and within its supply chain in order to identify, evaluate and prevent potential and actual negative impacts.

Overall responsibility pursuant to Section 3 (1) No. 2 LkSG is incumbent on the Operations Team with respect to Adient's own operations and on the Supplier Risk Management Team with respect to suppliers.

This responsibility includes, in particular, the monitoring, assessing, and mitigating of Risks and reporting and overall coordination within the scope of the own operations and supplier due diligence activities, respectively.

In addition to the Operations Team and the Supplier Risk Management Team, the Company has identified individuals and departments that have responsibilities that are relevant for the compliance with the due diligence obligations under the LkSG. Each of these work closely with the Operations leaders and the Director of Supplier Chain Risk Management on the areas of Sustainability (including Human Rights), Legal Compliance, Purchasing, and Health and Safety, for example.

Risk analysis of Adient's business operations and its supply chain is based on a multi-stage analysis of active suppliers, i.e., suppliers that Adient contract directly with.

If the analysis reveals an increased human rights or environmental Risk, the suppliers concerned are subject to a more in-depth review and, if necessary, appropriate remedial and preventive measures are taken.

In case any Risks are identified, they are assessed in further detail, weighed in their impact and scope. The mitigation measures are balanced on the degree of Risk identified and accordingly prioritized. In light of Adient's supply chain risk profile, we prioritized occupational health and safety, forced labor and child and labor as the most significant potential risks.

The outcome of the risk analysis is communicated to the Vice President EMEA Purchasing and Supply Chain and the Vice President JIT EMEA, respectively. They report the outcome of the risk assessment to the management.

The risk assessment with respect to Adient's own operations and its direct suppliers is conducted on an annual basis and additionally in the event of any indication of a Risk or a change in the risk profile of its supply chain.

In case Adient has any concrete indications of a violation of obligations or a Risk at indirect suppliers, for example, sub-suppliers, etc, we conduct an inquiry into the situation and, if applicable, work together with them to remedy the violation.

When we review answers received from our suppliers relating to our questions about these risks, we establish whether they report any actual breach of the legal and contractual obligations in these areas.

If a human rights or environmental violation is discovered, we take appropriate remedial action without undue delay. Depending on the severity of the violation, these measures may extend to the termination of business relations.

Complaint mechanisms are of particular importance in the detection and prevention of human rights and environmental risks and violations.

Adient's complaint procedure, known as the Integrity Helpline, available at, <https://adient.ethicspoint.com>, has been assessed against the requirements of the LkSG and has been found to meet these requirements. This complaint procedure is available 24 hours a day/7 days a week in 27 languages. It enables both our employees and third parties to submit anonymous reports of any potential violations of law or Adient's Ethics Policy, including but not limited to human rights and environmental violations, and Risks.

The Legal Department is responsible for executing and overseeing the complaint procedure. The reporter may communicate anonymously through the Integrity Helpline tool at any time through the complaint procedure. The Legal Department furthermore directly informs the Operations Team and the Supplier Risk Management Team of any input into the complaint procedure indicating a Risk.

We strongly encourage and promote this reporting culture and enforce a strict policy of non-retaliation for issues raised in good faith. To ensure transparency, Adient reports its Integrity Helpline statistics to the Board Audit Committee twice a year.

Any preventive or remedial measures that may become necessary in the course of the risk analysis are formulated and initiated by the persons responsible for the subject.

Documentation and reporting are carried out on an ongoing basis in accordance with legal requirements.

To ensure that our business partners meet these obligations, we require all our employees and external suppliers to comply with the expectations in our Global Supplier Standards Manual and Adient's Supplier Code of Conduct, which is publicly available on our website.

We expect our suppliers to demonstrate their commitment to human rights and creating a sustainable future for their employees, customers, communities, and the environment. More information about our supplier expectations is available in our most recent Sustainability Report and on the Supplier Portal.

We are committed to the continuous development of our human rights and environmental due diligence processes. For this purpose, we will review and – if applicable - optimize the implementation of these principles in the course of our activities on a regular and ad hoc basis.

For additional information about our human rights commitment, Ethics Policy, Sustainability Report or supplier requirements, visit www.adient.com or email sustainability@adient.com.

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Adient Germany Ltd. & Co. KG