



## **Adient Binding Corporate Privacy Rules**

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## 1. Introduction

These Binding Corporate Privacy Rules (“Rules”) outline how the Adient group treats personal data of current, past and prospective employees and contractors, customers, consumers, suppliers and vendors (“Individual(s)”) and set out its approach to privacy and data protection compliance. An overview of the Adient group members that have committed to respect these Rules (collectively referred to as “Adient”, “We”, “Our” or “Adient Companies”, and each individually as “Adient Company”) can be found in Annex II to these Rules.

The Rules are binding on all Adient Companies and their employees when Processing and transferring personal data as follows:

- Adient Companies are bound by an Intra-group Agreement to respect the BCRs.
- Adient Companies’ employees are bound by the BCRs via the employment agreement or various Adient policies.

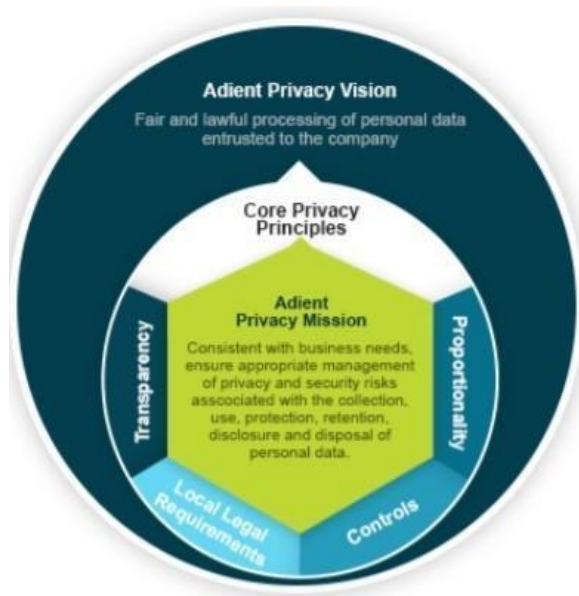
Personal data means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Adient’s privacy mission is:

**Consistent with business needs, ensure appropriate management of privacy and security risks associated with the collection, use, protection, retention, disclosure and disposal of personal data (“Processing”, “Process” or “Processed”).**

That mission in turn supports Adient’s privacy vision:

**Fair and lawful Processing of personal data entrusted to the company.**



Adient has a Privacy Office that is comprised of a multi-disciplinary team that is active throughout the world. The Privacy Office is led by the Director Global Privacy, reporting to the Senior Vice President Legal and Deputy General Counsel, who is the enterprise lead of Our global privacy program and enjoys the highest management support for monitoring compliance with the Rules. The Privacy Office is tasked with the enforcement of these Rules and ensures effective communication mechanisms are maintained to allow consistent governance of these Rules across Adient, regardless of business unit or geography. Adient maintains a privacy communications and awareness program to train Our employees globally and across all lines of businesses. We also conduct trainings on privacy and data protection topics on an at least annual basis, including Adient's policies and procedures as well as these BCRs. Trainings are aimed at certain functions that access personal data, are involved in its collection, or in the development of tools or systems used in Processing.

## 2. Scope and Application

As a global company, Adient Processes and transfers personal data between Adient Companies, a list of which, including their address, can be found in Annex II to these Rules, for normal business purposes, including workforce planning, talent acquisition, on-boarding, performance management, succession planning, learning and development, compensation and benefits, payroll, maintenance of employee data and other HR operational processes. Additionally, Adient Processes supplier data, such as contact information, relationship management information, transaction information, and security and compliance information, for relationship management and the administration of its contractual obligations. Adient will also Process personal data to fulfill its reporting duties, for legal defense and compliance purposes and to facilitate internal communications.

Purposes	Types of personal data	Categories of Individuals
Managing communications, facilitating collaboration and addressing queries	Contact information (e.g., business email address, business title); communications content and attachments.	Adient employees, contractors, suppliers

Company asset management, including allocation, maintenance administration and fleet management	Contact information (e.g., name, address, email address, telephone number, date and place of birth, national identification number)	Adient employees
Compensation, benefits and payroll management, talent acquisition and performance management, and workforce planning (incl. on-boarding, travel & expenses, succession planning, learning and development, compensation and benefits and other HR operational processes)	Contact information (e.g., name, address, email address, telephone number, date and place of birth, national identification number); payroll data (e.g., banking details, corporate credit card number, and transaction details); information on an individual's position; talent management information (e.g., CV, previous employment background); compensation information (e.g., base salary, bonus, benefits, performance reviews); internal; management records	Adient employees
Finance, accounting and tax administration and management	Contact information (e.g., name, address, email address, telephone number, date and place of birth, national identification number); bank account and billing information (e.g., tax identification number)	Adient employees, business customers, suppliers and vendors
Information security (incl. identity management, end-user support and troubleshooting)	Contact information (e.g. business email address, telephone number, unique ID or job title); electronic identification data (e.g. username, password, security questions, IP address) and IT usage information	Adient employees and contractors
Legal and compliance (incl. managing supplier due diligence, our ethics helpline, internal investigations and facility access and security management and internal	Information relating or required to establish, exercise and defend our legal rights, comply with our legal obligations, industry standards and enforce our	Adient employees, contractors, business customer, suppliers and vendors

audit)	internal policies (incl. where applicable, whistleblowing reports)	
Supplier management	Contact information of persons at suppliers and vendors (e.g., business email address, business title)	Suppliers and vendors

These Rules apply to the Processing of personal data collected and Processed by Adient Companies in the EEA and transferred to non-EEA based Adient Companies or onward transferred to other non-EEA based Adient Companies. These Rules also apply when an Adient Company Processes personal data on behalf of other Adient Companies.

At any given time, Adient Germany Ltd. & Co KG, a German private limited partnership, acts as the affiliate with delegated data protection responsibility. It is responsible for taking the necessary actions to remedy any breach of the Rules by an Adient Company and for paying compensation for material or non-material damages resulting from such breach.

### 3. Transparency and Accountability

We maintain and provide transparent notices to Individuals about why and how We collect and Process their personal data. These notices include clear information on the identity and the contact details of the Adient Company Processing the personal data, the contact details of Adient's Director Global Privacy, the use of personal data including the purposes for which personal data is Processed, the legal basis for the processing, Adient's legitimate interests where it bases Processing of personal data on such interests, other recipients of the personal data, and the fact that Adient intends to transfer personal data to third countries. Consistent with legal requirements, notices will also include any other information to ensure that Processing is fair and transparent, in particular information on data retention, Individuals' rights, the right to withdraw consent, the right to lodge a complaint with an EEA Supervisory Authority, and whether the provision of personal data is mandatory or optional and the possible consequences of failure to provide such data. Occasionally, as for example in precontractual scenarios, providing notice immediately at the time

of collection may not be possible. In such situations, We will do so as soon as possible thereafter, and at the latest (i) within one month, (ii) at the time of the first communication to the Individual if the personal data are to be used for communication purposes, or (iii) at the latest when the personal data are first disclosed to another recipient, except if there is an exemption under Local Law for not doing so.

In addition, these Rules inform Individuals about: (i) the scope of the Processing under these Rules, (ii) the data protection principles We apply when processing their personal data, including the lawfulness of the Processing, the security and data breach notification principles, restrictions on onward transfers and Individuals' data protection rights; (iii) the liability regime applicable to such Processing and (iv) their beneficiary rights with regard to such Processing and how to exercise those rights. All Individuals have the right to easily access these Rules.

We regularly assess Our privacy accountability. Adient considers privacy as an integral component of the design, development, implementation and management of Processing activities, and will implement the privacy-by-default and privacy-by-design principles for its Processing activities to facilitate compliance with the requirements of the Rules and applicable laws.

To that effect Adient will maintain a record of processing activities ("Record") carried out on personal data transferred under the Rules, and further requirements in accordance with local applicable (privacy) laws in their respective jurisdictions, where applicable. The Record we maintain as a controller contains the following information: (i) name and contact details of the controller and, where applicable, joint controller, data protection officer and representative; (ii) purposes of the Processing; (iii) a description of the categories of Individuals and of personal data; (iv) categories of recipients; (v) transfers of personal data; (vi) where possible, the envisaged time limits for erasure of the different categories of personal data; and where possible, (vii) a general description of the technical and organizational security measures. The Record that we maintain as a processor contain the following information: (i) the name and contact details of the processor and of each controller on behalf of which we are acting, and, where applicable, of the representative and data protection officer; (ii) the categories of Processing carried out on behalf of the controller; (iii) transfers of personal data; and where possible (iv) a general description of the technical and organizational security measures. Adient will maintain this Record in writing, including in electronic form, and will make it available to the Competent EEA Supervisory Authority on request.

Adient will carry out data protection impact assessments (“DPIA”) prior to Processing where a type of Processing is, taking into account the nature, scope, context and purpose of the Processing, likely to result in a high risk to the rights and freedoms of Individuals. Adient will consult with the Competent EEA Supervisory Authority prior to Processing if the DPIA indicates that the Processing would result in a high risk in the absence of measures taken by Adient to mitigate such risk.

#### **4. Fairness, Lawfulness and Purpose Limitation**

Personal data will be Processed in a fair and lawful manner. Adient Processes personal data for legitimate business purposes, such as the management and administration of human resources, customers, consumers, vendors and suppliers or to pursue compliance with legal requirements. Personal data will be collected for specific and legitimate purposes and not further Processed in a way incompatible with those purposes. Adient ensures that all Processing is based on a legal basis for Processing as stipulated in Article 6(1) and (3) GDPR, or as laid down in EEA or Member State law, as permitted by the GDPR, including:

- Individuals have given their consent to the Processing;
  - The Processing is necessary for the performance of a contract to which the Individual is a party or in order to take steps at the request of the Individual prior to entering into a contract;
  - The Processing is necessary for compliance with a legal obligation;
  - The Processing is necessary to protect the vital interests of the Individual or of another natural person;
  - The Processing is necessary for the performance of a task carried out in the public interest; or
- The Processing is necessary for the purposes of the legitimate interests pursued by the Adient or a third party to whom personal data is disclosed, except where such interests are overridden by the interests or fundamental rights and freedoms of the Individual.

#### **5. Data Quality and Proportionality, Limited Storage Period**

Personal data Processed by Adient will be:

- Adequate, relevant and as required by the data minimization principle not excessive in relation to the purposes for which it is collected and used.
- Accurate and, where necessary, kept up to date. Every reasonable step will be taken to ensure that personal data that are inaccurate are erased or rectified without delay, having regard to the



purposes for which they are Processed, unless erasure would conflict with other legal requirements.

- Not Processed or retained in an identifiable format for longer than necessary to achieve the purposes.

## **6. Rights of Individuals**

In addition to Our commitment to transparency and notice to Individuals, Adient respects and complies with Individuals' Right of Access to personal data relating to them.

- Right of Information for personal data collected directly from the Individuals and personal data not collected directly from Individuals: Confirmation to the Individual as to whether or not personal data relating to him/her is being Processed, the purposes of Processing, categories of personal data concerned, any recipients or categories of recipients to whom the personal data is disclosed, where possible the envisaged period for which the personal data will be stored or, if not possible, the criteria used to determine that period, communication to him/her in an intelligible form about the personal data Processed and any available information as to the source, and information about the right to lodge a complaint with a Competent EEA Supervisory Authority. Where personal data are collected directly or indirectly from Individuals and transferred to a third country or international organization and the existence or absence of an adequacy decision by the Commission, Individuals can ask to be informed about the appropriate safeguards that Adient uses for these data transfers by the means of a copy of them or information about where they have been made available.
- Right to Rectification: Individuals also have a right to request the correction of inaccurate personal data without undue delay and, taking into account the purposes of the Processing, to have incomplete personal data completed, including by means of providing a supplementary statement.
- Right to Erasure: Individuals can also request that Adient erases the personal data concerning them without undue delay, (i) when it is no longer necessary for the processing purposes it was collected and no legal obligations for the Adient Company acting as controller exist to retain the personal data, (ii) when individuals withdraw previously given consent, and where no other legal grounds for the processing exist, (iii) when there are no overriding legitimate grounds for the processing, (iv) when the personal data has been unlawfully processed, (v) when the

personal data has to be erased for compliance with a legal obligation to which the Adient Company acting as controller is subject.

- **Right to Restriction of Processing:** Individuals can request restriction of the processing of their personal data, if (i) the accuracy of the personal data is contested by the data subject, for a period enabling the Adient Company acting as controller to verify the accuracy of the personal data, (ii) the processing is unlawful and the data subject opposes the erasure of the personal data, requesting the usage restriction instead, (iii) the Adient Company acting as controller no longer needs the personal data for the purposes of processing, but the individual requires them to exercise or defend legal claims, (iv) the individual has objected to the processing for the time period where the processing based on the legitimate grounds of the controller are assessed against those of the individual. Such rectification, erasure, or restriction will be communicated to any recipient to whom the data was disclosed, unless this proves impossible or involves disproportionate effort.
- **Right to Data Portability:** Individuals can request to port the personal data they have provided in a structured, commonly used and machine-readable format, if the rights and freedoms of others are not affected, and if it was collected and processed based on the consent of the individual, or for the performance of a contract between the individual and the controller. This right does not apply if the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Adient Company acting as controller.
- **Right to Object:** Individuals can, by detailing the grounds related to their particular situation, object to the processing of their personal data based on legitimate interest at any time, or withdraw consent previously given, unless the Adient Company acting as controller demonstrates compelling legitimate grounds for the processing, which are essential for the Company, such as the exercise or defence of legal claims.

Individuals can exercise these rights without constraint and without expense, unless where requests are manifestly unfounded or excessive, in particular because of their repetitive character.

## **7. Beneficiary Rights for Individuals**

Individuals may seek enforcement of the Rules (other than Sections 1, 13 and 17 of these Rules covering training, audits, Our compliance network and mechanisms for updating of these Rules) by:

- lodging a complaint with each Adient Company that Processes their personal data or by contacting the Adient Privacy Office as set forth in Section 16 of these Rules;
- lodging a complaint with the Competent Supervisory Authority, in particular in the country of the Individual's habitual residence, place of work, or place of the alleged infringement or
- bringing proceedings against (i) Adient Germany Ltd. & Co KG in the courts in Germany or (ii) each Adient Company that transferred the personal data in their respective jurisdictions or in the jurisdiction of the Individual's habitual residence.

#### Liability, Jurisdiction & Burden of Proof

As part of the remedies set forth in this Section 7 of these Rules, Individuals may seek appropriate redress from Adient Germany Ltd. & Co KG before the courts in Germany, or of the location of the data exporter, to remedy any breach of the Rules by any Adient Company and, where appropriate, receive compensation for damages, suffered as a result of such breach, in accordance with a decision of a court. Individuals may choose to be represented by a not-for-profit body, organization or association, which have been constituted with statutory objectives to protect the rights and freedoms of Individuals with regards to the protection of their personal data to lodge a complaint on their behalf, or to exercise their rights, or seeking judicial remedy against a Supervisory Authority, or a Controller or Processor, if such rights are in accordance with applicable laws.. . If such Individual demonstrates that he or she has suffered damage and that such damage likely occurred due to a breach of the Rules by an Adient Company, the burden of proof to show that this entity is not responsible for the breach or that no such breach took place will rest with Adient Germany Ltd. & Co KG.

#### **8. Compliance with Local Laws**

Adient will only use personal data in accordance with these Rules, Local Privacy Laws, and any additional laws that may relate and apply to the Processing of personal data. Where Local Law requires a higher level of protection of personal data than the Rules, the law will take precedence over the Rules. Adient will only Process Sensitive Data with the Individual's explicit consent, unless Adient can rely on an alternative legal basis, permission, or requirement under of the country of

origin of the data for such Processing without consent, including: (i) the Sensitive Data is manifestly made public by the Individual; (ii) the Processing is necessary for the establishment, exercise or defense of legal claims by Adient; (iii) the Processing is necessary for the purpose of carrying out the obligations and specific rights of Adient or the Individual in the field of employment and social security and social protection law; (iv) the Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) GDPR based on EEA or Member State law; or (v) the Processing is necessary to protect the vital interests of the Individuals or another person where the Individual is legally or physically incapable of giving his or her consent. Adient will only Process personal data relating to criminal convictions and offenses, if such Processing is carried out under the control of a competent authority and in accordance with European Union or Member State law, and Local Laws to ensure appropriate safeguards for the rights and freedoms of the Individuals impacted by such Processing. .

## **9. Automated Decision Making**

We ensure that Individuals are not subject to a decision which produces legal effects or that similarly significantly affects them and is based solely on automated Processing, including profiling, except where this decision (a) is necessary for entering into, or performance of a contract to which the Individual is party, (b) is required or authorized by applicable law which also lays down suitable measures to safeguard the Individual's rights and freedoms and legitimate interests or, (c) is based on the Individual's explicit consent. If Adient implements Processing that employs such automated decision-making, it will provide suitable measures to safeguard Individuals' rights and freedoms and legitimate interests. For this purpose Adient will provide Individuals with the opportunity to receive information on the logic involved, the right to obtain human intervention on Adient's part, to express the Individual's point of view and to contest the decision.

## **10. Direct Marketing**

When Processing personal data for direct marketing purposes, Adient provides measures for Individuals to opt-out from receiving marketing free of charge. This can be done by clicking on relevant website links, following the directions contained in an email or by contacting Our Privacy Office at [ae-privacy@adient.com](mailto:ae-privacy@adient.com).

## 11. Security, Confidentiality and the Use of Third Parties

Adient applies appropriate technical and organizational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access, in particular where personal data is transferred over an IT network, such as the Internet, and against all other unlawful forms of Processing. We maintain a comprehensive information security program that is proportionate to the risks associated with the Processing. The program is continuously adapted to mitigate operational risks and to ensure the protection of personal data taking into account best practices. Adient will also use enhanced security measures when Processing any Sensitive Data. Adient maintains a data privacy incident and breach management procedure, which requires notification without undue delay of any reportable personal data breach to (i) Adient's affiliate with delegated data protection responsibilities, (ii) the liable BCR member, (iii) the Adient Privacy Office, (iv) the Adient Company acting as a controller when an Adient Company acting as a processor becomes aware of a personal data breach (if any), (v) the Competent EEA Supervisory Authority (where feasible, not later than 72 hours after having become aware of the personal data breach) where the personal data breach is likely to result in a risk to the rights and freedoms of natural persons, and (vi)- to Individuals where the personal data breach is likely to result in a high risk to their rights and freedoms. Adient also documents any such personal data breach, including the facts, its effects, and remedial actions taken, and makes such documentation available to the Competent EEA Supervisory Authority on request.

We conduct third party security reviews to ensure third parties to whom We entrust personal data offer adequate protection. Whenever Adient relies on Adient Group companies acting as processors for other Adient Group companies, or on third parties that may have access to personal data, We enter into contractual arrangements with them to protect the personal data in accordance with all requirements of the GDPR, including to. (i) provide sufficient technical, organizational and legal measures to protect the security and confidentiality of the personal data; (ii) only processes the personal data on documented instructions from the controller, including with regard to transfers of personal data to a third country or an international organisation; (iii) inform Us if it cannot comply with its data protection obligations, when there is a personal data breach, or when it receives requests from Individuals or from a public authority; (iv) only transfer personal data out of the EEA in compliance with the requirements for transfers of personal data to third countries or international organisations of the GDPR, in particular as under Articles 44, 45, 46 and 47 of the

GDPR; (v) only sub-contract the Processing with Our authorization and under an agreement that imposes on the same data protection obligations as set out in the contract between Us and the processor; (vi) ensure that persons authorized to process the personal data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality; (vii) assist Us to ensure compliance with its obligations pertaining to the security of the personal data, data protection impact assessments and related prior consultations; (viii) at the choice of the controller, delete or return the personal data after the end of the provision of the services; (ix) make available information necessary to demonstrate compliance with its obligations under the agreement and inform Us if, in its opinion, an instruction infringes the GDPR and (x) remain liable for the performance of their data protection obligations.

Where an Adient Company Processes personal data on behalf of another Adient Company it will adhere to these Rules and act only upon the instructions of the Adient Company on whose behalf the Processing is carried out. Adient maintains processes to ensure that prior to the transfer of personal data to another Adient Company, the receiving Adient Company (Data Importer) is bound by the Rules and abides by Local Laws.

## **12. Onward Transfers**

Adient maintains an inventory of key Processing systems, storage locations, third party service providers and data flows. We ensure this information is kept up-to-date to reflect any change to Processing activities. We also maintain processes to ensure that personal data transferred will be treated in accordance with these Rules, regardless of their location. Personal data may be transferred to Our non- EEA Adient affiliates as listed in Annex II.

Furthermore, when We do rely on third parties outside of Adient, We maintain procedures to ensure protection for personal data and compliance with Local Laws. If personal data is disclosed to third parties located outside the EU/EEA, We take measures to ensure that any personal data transferred receives adequate protection in accordance with EEA data protection rules, such as through contractual clauses, or other data transfer mechanisms as described in Chapter V of the GDPR.

### **13. Monitoring Compliance through Audits**

In addition to the work of Our Privacy Office, We maintain processes to assess Our compliance with the Rules at least every three years, or on specific request by Our Privacy Office, such as if there are indications of non-compliance with the Rules. Our audit program is set up and conducted by our Privacy Office in collaboration with the Adient's internal audit department (Internal Audit) and covers all aspects of the Rules, including the methods for ensuring compliance. The Internal Audit department itself is independent and not part of the Privacy Office. BCR audits will be carried out always by independent internal or external parties to avoid any conflict of interest. Audits may be carried out by external auditors, if the Internal Audit department assessed that they may not be able to perform the audits themselves in a timely manner and in accordance with these Rules, or if planned audits or findings will require additional competencies. Audit findings are reported to the management of Adient Germany Ltd. & Co KG, the Privacy Office and where appropriate, Our ultimate parent's audit committee, and include follow up action plans to ensure corrective measures are taken. Adient will make available the audit findings to the Competent EEA Supervisory Authorities upon their request, and will give the power to the Competent EEA Supervisory Authorities to carry out a data protection audit of any member of the Rules.

### **14. Cooperation with EEA Supervisory Authorities**

Adient will cooperate with the Competent EEA Supervisory Authorities and will respond to requests and questions about the processing operations covered by these Rules and any issue related to the Rules. When personal data is transferred between Adient Companies, the importing and exporting entities will cooperate with inquiries and (where necessary, on site) audits conducted by the Competent EEA Supervisory Authorities and take into account the advice of these Supervisory Authorities and abide by its decision on any issue related to these Rules. Any dispute related to the Competent EEA Supervisory Authority's supervision of compliance with the Rules will be resolved by the courts of the Member State of that Supervisory Authority, in accordance with that State's procedural law. The Adient Companies agree to submit themselves to the jurisdiction of these courts.

### **15. Conflicts with Local Law**

#### **Local Law Assessments**

Adient Companies will rely on the Rules as a tool for transfers only where they have assessed that the law and practices in the country of destination applicable to the Processing of the transferred



personal data, including any requirements to disclose personal data or measures authorizing access by public authorities, do not prevent them from fulfilling their obligations under these Rules. The latter is based on the understanding that laws and practices that respect the essence of the fundamental rights and freedoms, and do not exceed what is necessary and proportionate in a democratic society to safeguard one or more legislative measure<sup>1</sup>, are not in contradiction with the Rules. In assessing the laws and practices of the third country, Adient takes into account the following elements: (i) the specific circumstances of the transfers or set of transfers, and of any envisaged onward transfers within the same third country or to another third country, including purposes for which the data are transferred and processed, types of entities involved in the processing (the Data Importer and any further recipient of any onward transfer), economic sector in which the transfer or set of transfers occur, categories and format of the personal data transferred, location of the processing, including storage, and transmission channels used.; (ii) the laws and practices of the third country, including those authorizing access, or requiring to disclose data, to public authorities as well as the applicable limitations and safeguards and (iii) any relevant contractual, technical or organizational safeguards to supplement the Rules. Adient Companies will document such assessment, as well as the supplementary safeguards implemented and will make the assessment available to the Competent EEA Supervisory Authority upon request. If additional safeguards are put in place, the affiliate with delegated data protection responsibility and the Privacy Office will also be informed thereof and involved in the assessment.

The Data Importer will promptly notify the Data Exporter and the affiliate with delegated data protection responsibility if it has reasons to believe that it is or has become subject to laws or practices that would prevent it from fulfilling its obligations under the Rules. Upon verification of such notification, the Data Exporter, along with the affiliate with delegated data protection responsibility and the relevant Privacy office will promptly identify appropriate supplementary measures. The same applies if a Data Exporter has reasons to believe that a Data Importer can no longer fulfil its obligations under the Rules. Where the Data Exporter assesses that the Rules cannot be complied with even if accompanied by supplementary measures are put in place, or if instructed to do so by the Competent EEA Supervisory Authority, it will suspend any relevant transfers until compliance is again ensured or the transfer is ended. Following such a suspension, the Data Exporter has to end the transfer if compliance is not restored within one month of

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<sup>1</sup> Exemplary list of legislative measures (not exhaustive): National security, defence, public security, prevention and prosecution of criminal offences including threats to public security, public health, protection of the individuals or the rights and freedoms of others, the enforcement of civil law claims, or other measures.



suspension. In this case, personal data that have been transferred prior to the suspension, and any copies thereof, should, at the choice of the Data Exporter, be returned to it or destroyed in their entirety. The affiliate with delegated data protection responsibility and the Privacy office will ensure that the identified supplementary measures will be applied in case the same type of transfers is carried out by any Adient Company or, where effective supplementary measures could not be put in place, the transfers at stake are suspended or ended. Data Exporters must monitor in collaboration with Data Importers, developments in the relevant third countries that could affect the initial assessment and decisions taken.

#### Access requests

In addition, a Data Importer will inform promptly a Data Exporter and the Individual if it (i) receives a legally binding request by a public authority under the laws of the third country for disclosure of personal data. Such notification will include information about the personal data requested, the requesting authority, the legal basis for the request and the response provided; or (ii) becomes aware of any direct access by public authorities to personal data transferred. Such notification will include all information available to the Data Importer. Where Local Law prohibits such notification, Adient will use its best efforts to waive this prohibition and communicate as much information as possible and as soon as possible, and will document its best efforts in order to be able to demonstrate them upon request of the Data Exporter. The Data Importer will provide the Data Exporter, at regular intervals, with as much relevant information as possible on the requests received. If the Data Importer is prohibited from providing such information to the Data Exporter it will, without undue delay, inform the Data Exporter accordingly. The Data Importer will preserve the information and make it available to the Competent EEA Supervisory Authority, upon request.

The Data Importer will review the legality of the request for disclosure, in particular whether it remains within the powers granted to the requesting public authority, and will challenge the request if, after careful assessment, it concludes that there are reasonable grounds to consider that the request is unlawful under the laws of the country of destination, applicable obligations under international law, and principles of international comity. The Data Importer will, under the same conditions, pursue possibilities of appeal. When challenging a request, the Data Importer will seek interim measures to suspend its effects until the competent judicial authority has decided on its merits. It will not disclose the personal data requested until required to do so under the applicable

procedural rules. The Data Importer will document its legal assessment and any challenge to the request for disclosure and, to the extent permissible under the laws of the country of destination, make the documentation available to the Data Exporter and the competent Supervisory Authority upon request. The Data Importer will provide the minimum amount of information permissible when responding to a request for disclosure, based on a reasonable interpretation of the request.

The Privacy Office or its local data privacy contact will report such conflicts to the Competent EEA Supervisory Authorities upon request. Notwithstanding the above, any transfer of data from Adient to a public authority cannot be massive, disproportionate and indiscriminate in a way that is unnecessary in a democratic society.

## **16. Complaints and Inquiries**

Any Individual whose personal data is subject to these Rules may raise concerns that Adient is not complying with them or Local Law by contacting the Privacy Office:

By email to: [ae-privacy@adient.com](mailto:ae-privacy@adient.com) and [co-general.counsel@adient.com](mailto:co-general.counsel@adient.com)

Or in writing to:

Adient Privacy Office

c/o Adient Germany Ltd. & Co KG,

Industriestrasse 20-30

51399 Burscheid

Germany

All complaints will be handled by the Privacy Office in an independent manner. Furthermore, all individuals are welcome to communicate with Adient regarding privacy issues (including questions on how to exercise individual rights per Sections 6, 9 and 10) or with questions or comments through one of the means above. All Adient employees are responsible for reporting any complaints or privacy incidents that are brought to their attention. Adient's Privacy Office will respond to individuals' rights requests or complaints and inform them on actions taken without undue delay, and in any event, within one month from the date of receipt or in accordance with Local Laws, in case a shorter timeframe is imposed by such Laws. Taking into account the

complexity and number of requests, that one-month period may be extended by us for maximum by two (2) further months, in which case the complainant will be informed accordingly. If the complaint is upheld, Adient will take appropriate remedial measures as necessary to resolve the complaint and ensure compliance with the Rules as appropriate. If an Individual is not satisfied with the response (including in case of unjustified delays), then that Individual can lodge a complaint with the relevant EEA Supervisory Authority, or lodge a claim with a court of a competent jurisdiction. The Individual's right to lodge a complaint before the relevant EEA Supervisory Authority or lodge a claim with a court of a competent jurisdiction is not dependent on the Individual having used the above complaint handling process beforehand.

#### **17. Effective Date and Changes to the Rules**

The Rules became effective on June 20, 2025 and apply to all Processing of personal data by Adient Companies on or after that date. The Rules may be modified as necessary, for example to ensure compliance with changes in Local Law or regulations, binding formal decisions of Competent EEA Supervisory Authorities, as well as alterations to Adient processes or its internal organization.

The Privacy Office will promptly communicate any modification of the Rules that may affect the level of protection offered by the Rules or significantly affect the Rules (i.e. changes to the binding character), to the Competent EEA Supervisory Authorities via the North Rhine-Westphalia Commissioner for Data Protection and Freedom of Information. Adient will communicate any changes to the Rules to Adient Companies bound by them without undue delay.

Adient will take measures to ensure that new Adient Companies are bound by the Rules and the Privacy Office will maintain an updated list of the Adient Companies bound by the Rules and will keep track of and record updates to the Rules, and will provide the necessary information to Competent EEA Supervisory Authorities and Individuals. Personal data transfers to new Adient Companies will not take place before they are effectively bound by the Rules and able to comply. Adient will communicate whether any changes have been made to the Rules or to the list of Adient companies bound by them once a year to the Competent EEA Supervisory Authorities, via the North Rhine-Westphalia Commissioner for Data Protection and Freedom of Information, with a brief explanation of the reasons justifying the update (if any).

## **18. Publication of the Rules**

These Rules will be made publicly available in full on Adient's dedicated webpage ([www.adient.com/privacy](http://www.adient.com/privacy)) and on its Intranet. The Privacy Office will ensure that any update of the Rules and the list of Adient Companies is published without undue delay. For more information, please see [www.adient.com](http://www.adient.com). Individuals can obtain a copy of the intra-group agreement implementing the Rules by contacting the Privacy Office at the contact details provided in Section 16 above.

## **19. Termination and Non-Compliance**

A Data Importer, which ceases to be bound by the Rules may keep, return, or delete the personal data received under the Rules. If the Data Exporter and Data Importer agree that the data may be kept by the Data Importer, protection must be maintained in accordance with Chapter V GDPR. A Data Importer should promptly inform the Data Exporter if it is unable to comply with the Rules. Where the Data Importer is in breach or unable to comply with the Rules, the Data Exporter should suspend the transfer. The Data Importer should, at the choice of the Data Exporter, immediately return or delete the transferred personal data where: (i) the Data Exporter has suspended the transfer, and compliance with the Rules is not restored within a reasonable time, and in any event within one month of suspension; (ii) the Data Importer is in substantial or persistent breach of the Rules or (iii) the Data Importer fails to comply with a binding decision of a competent court or Competent EEA Supervisory Authorities regarding its obligations under the Rules. The same commitments apply to any copies of the data. The Data Importer should certify the deletion of the data to the Data Exporter. Until the data is deleted or returned, the Data Importer will continue to ensure compliance with the Rules. In case of local laws applicable to the Data Importer that prohibit the return or deletion of the transferred personal data, the Data Importer should warrant that it will continue to ensure compliance with the Rules, and will only process the data to the extent and for as long as required under Local Law.

## **Annex I - Glossary**

**Adient, We, Our or Adient Company/ies** – means Adient group members that have committed to respect the Rules.

**BCR Member(s)** – Group members which are bound by the BCR.

**Commission** – The EU Commission.

**Competent Supervisory Authority** - means the EEA Supervisory Authority competent for the Data Exporter.

**Data Exporter** - means an EEA-Adient Company that transfers personal data to a non-EEA-Adient Company.

**Data Importer** - means a non-EEA-Adient Company that receives personal data from an EEA-Adient Company.

**DPIA** – means Data Protection Impact Assessment.

**EU** – European Union.

**EEA** – means European Economic Area.

**General Data Protection Regulation or GDPR** – means the EU Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (amended or replaced from time to time).

**Individuals** – means current or past employees and contractors, customers, consumers, suppliers and vendors.

**Intragroup Agreement (IGA)** – Agreement by which Adient affiliates commit to the Rules of the IGA and this BCR.

**Local Law** - means any federal, state, or local applicable data protection law, constitution, treaty, convention, ordinance, code, rule, regulation, order, injunction, judgment, decree, ruling or other similar requirement enacted, adopted, promulgated or applied by an authority that is binding upon Adient.

**Member State** - means an EU Member State or EEA member country.

**Non-EEA** – means non-European Economic Area.

**Rules** – means these Binding Corporate Privacy Rules that outline how the Adient group treats personal data of current, past and prospective employees and contractors, customers, consumers, suppliers and vendors and set out its approach to privacy and data protection compliance.

**Sensitive Data** - means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric

data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

**Supervisory Authority** - means an independent public authority established by a Member State.

## Annex II

### Adient Legal Entities under the BCR (by Oct. 2024)

EEA	
Austria	
Adient Automotive Holding GmbH	1, Helmut Naue Platz, Mandling, Austria, 8974, Austria
Belgium	
Adient Belgium BVBA	1, Paul Christiaenstraat, Assenede, 9960, Belgium
Czech Republic	
Adient Czech Republic k.s.	Dubicka 1800, Ceska Lipa, 47000, Czech Republic
Adient Strakonice s.r.o.	1111, Heydukova, Strakonice, 38601, Czech Republic
France	
Adient France SAS	6 Rue Schertz, F-67100, Strasbourg-Meinau, France
Adient Holding France	6, Rue Schertz, Strasbourg, F-67100, France
Adient Interiors France SAS	48, rue de l'Industrie, Conflans, 70800, France
Adient Seating SAS	6 Rue Schertz, Strasbourg Meinau, F-67100, France
Adient Strasbourg	6, Rue Schertz, Strasbourg, F-67100, France
Germany	
Adient Automotive Components GmbH	Rothenberger Strasse 55, Hilchenbach, 57271, Germany
Adient Beteiligungs GmbH	167, Merscheider Str., Solingen, Germany
Adient Components Ltd. & Co. KG	Hertelsbrunnering 2, Kaiserslautern, 67657, Germany
Adient Engineering and IP GmbH	20-30, Industriestr., Burscheid, Germany, 51399, Germany
Adient Germany Ltd. & Co. KG.	20-30, Industriestr., Burscheid, Germany, 51399, Germany
Adient Interiors Engineering Europe GmbH	20-30, Industriestr., Burscheid, Germany, 51399, Germany
Adient Interiors Ltd. & Co. KG	20-30, Industriestr., Burscheid, Germany, 51399, Germany
Adient Ltd. & Co. KG	20-30, Industriestr., Burscheid, Germany, 51399, Germany
Adient Metal Forming Technologies GmbH	Muhlenstrasse, 21, Solingen, 42699, Germany
Adient Metals & Mechanisms GmbH	Merscheider Str., 167, Solingen, 42699, Germany
Adient Real Estate Holding Germany GmbH	Industriesstrasse 20-30, Burscheid, 51399, Germany
Adient Saarlouis Ltd. & Co. KG	Ford Industrial Supplier Park, Saarlouis, 66740, Germany
Adient Seating Ltd. & Co. KG	Industriesstrasse 20-30, 51399 Burscheid, Germany
Adient Zwickau GmbH	Industriepark, 08393 Meerane, Germany
Hungary	
Adient Hungary Kft.	2, Hammerstein utca, Mór, 8060, Hungary
Adient Mezölak Korlátolt Felelősségű Társaság	92/a, Petőfi Sandor u., Mezölak, 8514, Hungary
Ireland	
Adient Automotive Ireland Limited	3, North Wall Quay, IFSC, Dublin 1, Ireland
Adient Holding Ireland Limited	3, North Wall Quay, IFSC, Dublin 1, Ireland
Adient International Ireland Limited	3, North Wall Quay, IFSC, Dublin 1, Ireland
Italy	
Adient Italy S.r.l.	CORSO Fratelli Cervi 27, Collegno (TO), 10093, Italy
Luxembourg	
Adient Financial Luxembourg S.a r.l.	35F Avenue John F Kennedy, L-1855, Luxembourg
Adient Interiors Holding EU S.a.r.l.	35F Avenue John F Kennedy, L-1855, Luxembourg
Adient Interiors Holding Luxembourg SCS	8-10, Avenue de la gare, Luxembourg, 1610, Luxembourg
Adient Luxembourg Asia Holding S.a.r.l.	35F Avenue John F Kennedy, L-1855, Luxembourg
Adient Luxembourg China Holding S.a.r.l.	35F Avenue John F Kennedy, L-1855, Luxembourg
Adient Luxembourg Holding S.a.r.l.	35F Avenue John F Kennedy, L-1855, Luxembourg
Adient Luxembourg Poland Holding S.a.r.l.	35F Avenue John F Kennedy, L-1855, Luxembourg
Poland	

Adient Foam Poland Spolka z ograniczona odpowiedzialnoscia	6, ul. Wygoda, Zory, 44-240, Poland
Adient Poland Sp. z o.o.	78, ul. Swierczewskiego, Swiebodzin, 66-200, Poland
Adient Seating Poland Spółka z ograniczona odpowiedzialnoscia	93, ul. H. Krupanka, Siemianowice Slaskie, 41-100
Romania	
Adient Automotive Romania S.R.L.	65B, National Road, Commercial Zone Geamana, Bradu, no 16 Arges County, Romania
Adient SRL	Room 24, 1 Hammerstein Street, Jimbolica City, Timis, Romania
Slovakia	
Adient Innotec Metal Technologies s.r.o.	2740, Zvolenska cesta, Lucenec, 98401
Adient Slovakia s.r.o.	4, Sturova, Bratislava, 81102, Slovakia
Trim Leader, a.s	Kostany nad Turcom 337, Martin, 036 01, Slovakia
Slovenia	
Adient Novo mesto, proizvodnja avtomobilskih sedežev, d.o.o.	Kandijska 60, Novo Mesto, Slovenia
Spain	
Adient Automotive S.L.	Carrera de Caballos 53, Zaragoza, Alagon, 50630, Spain
Adient Real Estate Holding Spain SL	C/ General Motors, numero 10, Parcela 30, Pedrola (Zaragoza), 50690, Spain
Adient Seating Holding Spain, S.L.	C/ General Motors, numero 10, Parcela 30, Pedrola (Zaragoza), 50690, Spain
Adient Seating Spain S.L.	C/ General Motors, numero 10, Parcela 30, Pedrola (Zaragoza), 50690, Spain
Sweden	
Adient Sweden AB	Hamneviksvägen 101, 418 79 Göteborg, Sweden
United Kingdom	
Adient Holding Germany Ltd.	120, Demise C, Ground Floor, Longwood Close, Westwood Business Park, Coventry
Adient Holding Ltd	120, Demise C, Ground Floor, Longwood Close, Westwood Business Park, Coventry
Adient Ltd	120, Demise C, Ground Floor, Longwood Close, Westwood Business Park, Coventry
Adient Properties UK Ltd	120, Demise C, Ground Floor, Longwood Close, Westwood Business Park, Coventry
Adient Seating UK Ltd	120, Demise C, Ground Floor, Longwood Close, Westwood Business Park, Coventry
Adient UK Pension Scheme Trustee Limited	120, Demise C, Ground Floor, Longwood Close, Westwood Business Park, Coventry
CR Hammerstein Limited	3, c/o Scott Moncrieff, Exchange Place, Edinburgh, EH3 8BL, Scotland
Non-EEA	
Argentina	
Adient Automotive Argentina S.R.L.	Ruta A0 12 Km 2.85 Pueblo Esther. CP: 2126 Santa Fe, Argentina. (Plant Address)
Brazil	
Adient do Brasil Bancos Automotivos Ltda.	Avenida Robert Kennedy, 925, parte, Vila Beatriz, Sao Bernardo do Campo, State of Sao Paulo, 09860-000, Brazil, Intern
China	
Adient (China) Investment Co., Ltd.	Room 4501-4503, No.1601 Nanjing West Road, Jing'an District, Shanghai, China
Adient (Chongqing) Automotive Components Co., Ltd.	No.99, Pingtai Road, Huangmaoping, Liangjiang New Area, Chongqing, China
Adient Yufu (Chongqing) Automotive Components Co., Ltd.	No.109, Yucang Avenue, Fusheng Town, Liangjiang New Area, Chongqing, China
Adient (Taizhou) Automotive Components Co., Ltd.	No.5988, Dongfang Avenue, Pengjie Town, Luqiao District, Taizhou City, Zhejiang Province, China
Adient (Chengdu) Automotive Components Co., Ltd.	No. 199, Long'an Road, Chengdu Economic and Technological Development Zone (Longquanyi District), Sichuan Province, China
Adient (Hangzhou) Automotive Components Co., Ltd.	No.599, Lvyin Road, Dajiangdong Industrial Cluster, Hangzhou, Zhejiang Province, China
Adient (Nanchang) Automotive Components Co., Ltd.	No.26, Xiongxi 1st Road, Xiaolan Economic and Technological Development Zone, Nanchang County, Jiangxi Province, China
Adient (Daqing) Automotive Components Co., Ltd.	No.13, Woqing Road, High-tech Zone, Daqing City, Heilongjiang Province, China
Adient (Hefei) Automotive Components Co., Ltd.	1# Chenying Road, Feixi Economic Development Zone, Hefei City, Anhui Province, China
Adient (Wuhan) Automotive Components Co., Ltd.	No.1906, 19F, No.9 Legend West Road, Jiuhua Economic Development Zone, Xiangtan City, Hunan Province, China
Adient (Nantong) Automotive Seating Components Co., Ltd.	No. 19 Chenyang Road, Economic and Technological Development Zone, Nantong City, Jiangsu Province, China



Hong Kong	
Adient Asia Holdings Co., Limited	Unit 1812A, 18/F., Exchange Tower, No. 33 Wang Chiu Road, Kowloon Bay, Kowloon, Hong Kong
India	
Adient India Private Limited	Plot No. 1, S. No. 235/245 Hinjewadi, Taluka Muishi. District Pune, State Maharashtra, 411 027, India
ISRI Adient Automotive Seating Limited	PLOT NO. 1, SURVEY NO. 235/245, HINJWADI, TAL-MULSHI, PUNE, 411057, India
Indonesia	
PT Adient Automotive Indonesia	Kawasan Industri Kota Bukit Indah Blok H II No. 6-11, Kabupaten Purwakarta 41181, Jawa Barat, Indonesia, 41181
Japan	
Adient GK	1-2-7 Sachiura, Kanazawa-ku, Yokohama
Adient Holding GK	1-2-7 Sachiura, Kanazawa-ku, Yokohama
Kinryo Kogyo Co., Ltd.	3 Kokubu, Miyako-cho, Miyako-gun, Fukuoka
Jersey	
Adient Global Holdings Ltd	2nd Floor, Gaspe House, 66-72 Esplanade, St Helier, JE1 1GH
Adient International Ltd	2nd Floor, Gaspe House, 66-72 Esplanade, St Helier, JE1 1GH
Korea	
Adient DongSung Inc	1518, Songjeong-dong, Gngseo-gu, Busan, 618-817, Korea
Adient Korea Inc	45, Tangjeong-ro, Tangjeong-myun, Asan-city, Chungnam, 336-841, Korea, Korea, Republic of
North Macedonia	
Adient Automotive Dooel Strumica	TDIZ, R-605, Strumica, Strumica, 2400, North Macedonia
Adient Seating Dooel Stip	14, Technological Industrial Development Zone (TDIZ), Stip, North Macedonia
Malaysia	
Adient Automotive Components (M) Sdn. Bhd.	Lot 5, Persiaran Sabak Bernam, Section 26, (Hicom) 40000 Shah Alam, Ehsan, Selangor Darul, Malaysia
Adient Automotive Holding (M) Sdn. Bhd.	Lot 5, Persiaran Sabak Bernam, Section 26, (Hicom) 40000 Shah Alam, Ehsan, Selangor Darul, Malaysia
Adient Automotive Seating (M) Sdn. Bhd.	Lot 5, Persiaran Sabak Bernam, Section 26, (Hicom) 40000 Shah Alam, Ehsan, Selangor Darul, Malaysia
Tarumas Padu Sdn. Bhd.	Lot 5, Persiaran Sabak Bernam, Section 26, (Hicom) 40000 Shah Alam, Ehsan, Selangor Darul, Malaysia
Mexico	
Adient Industries Mexico S. de R.L. de C.V.	David Alfaro Siqueiros #104, Col. Valle Oriente, C.P 66269, San Pedro Garza Garcia, Nuevo Leon, Mexico
Adient Leasing Mexico S. de R.L. de C.V	David Alfaro Siqueiros #104, Col. Valle Oriente, C.P 66269, San Pedro Garza Garcia, Nuevo Leon, Mexico
Adient Mexico S. de R.L. de C.V.	David Alfaro Siqueiros #104, Col. Valle Oriente, San Pedro Garza Garcia, Nuevo Leon, Mexico, 66269
Adient Queretaro S. de R.L. de C.V.	David Alfaro Siqueiros #104, Col. Valle Oriente, C.P 66269, San Pedro Garza Garcia, Nuevo Leon, Mexico
Adient Servicios S. de R.L. de C.V.	Epsilon No. 6525, Parque Industrial Omega, CD. Juarez, Chihuahua, 32320, Mexico
Adient Shared Services Mexico S. de R.L. de C.V.	David Alfaro Siqueiros #104, Col. Valle Oriente, San Pedro Garza Garcia, Nuevo Leon, Mexico, 66269
Adient Subholding Leasing S. de R.L. de C.V.	David Alfaro Siqueiros #104, Col. Valle Oriente, C.P 66269, San Pedro Garza Garcia, Nuevo Leon, Mexico
Ensamble de Interiores Automotrices, S. de R.L. de C.V.	David Alfaro Siqueiros #104, Col. Valle Oriente, San Pedro Garza Garcia, Nuevo Leon, Mexico, 66269
Serbia	
Adient Interiors d.o.o.	4, Kosovska, Building 1A, Kragujevac, 34000, Serbia
Adient Seating d.o.o.	Oktobarski Zrtava bb, Groznica, Kragujevac, 34000, Serbia
South Africa	
Adient South Africa (Pty) Ltd.	79, Waltloo Road, Samcor Park, Silverton, 0127

Thailand	
Adient (Thailand) Co., Ltd.	No. 49/68, Moo 5, Thungsukla Sub-District, Sriracha District, Chonburi Province, Thailand
Adient & Summit Corporation Ltd.	64/25 Moo 4, Eastern Seaboard Industrial Estate. T.Pluakdaeng A.Pluakdaeng Rayong, Thailand, 21140
Turkey	
Adient Turkey Seating Otomotiv Limited Sirketi	4, 1. Cadde 11 Sok, Tosb Taysad Organize Sanayi Bolgesi, Cayirova Kocaeli, Turkey
Diniz Adient Oto Donanim Ticaret ve Sanayi A.S.	Organize Sanayi Bolgesi, San Cad #25, Bursa, Turkey
United States	
Adient Clanton Inc.	Two North Jackson Street, Suite 605, Montgomery, AL, 36104
Adient Eldon Inc.	49200 Halyard Dr., Michigan, Plymouth, 48170
Adient European Holding LLC	c/o The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE, 19801
Adient Holding Brazil LLC	c/o Corporation Trust Company, Corporation Trust Center, 1209 Orange St., Delaware, Wilmington
Adient Holding International Ireland LLC	833 E. Michigan Street, Suite 1100, Milwaukee, WI, 53202
Adient Holding Mexico LLC	c/o Corporation Trust Company, Corporation Trust Center, 1209 Orange St., Delaware, Wilmington
Adient Holding Slovakia LLC	c/o Corporation Trust Company, Corporation Trust Center, 1209 Orange St., Delaware, Wilmington
Adient Holding South Africa LLC	c/o Corporation Trust Company, Corporation Trust Center, 1209 Orange St., Delaware, Wilmington
Adient Holding Turkey LLC	c/o Corporation Trust Company, Corporation Trust Center, 1209 Orange St., Delaware, Wilmington
Adient Inc.	c/o The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE, 19801
Adient Systems Engineering LLC	49200 Halyard Drive, Plymouth, MI, 48170, United States
Adient US LLC	49200 Halyard Drive, P.O. Box 8010, Plymouth, MI, 48170, United States
TechnoTrim, Inc.	49200 Halyard Drive, Plymouth, MI, 48170, United States