



CORPORATE POLICY

Subject	Department		Number
Human Rights and Sustainability & Social Responsibility	Dana Worldwide		
	Responsible Officer: Chief Compliance Officer	Date of Last Revision: March 2020	Approved By: Executive Leadership Team

1.0 Statement of Policy

- 1.1 Dana's Standards of Business Conduct require that the company and its subsidiaries conduct its business in a legal, ethical and responsible manner with a respect for human rights. Basic human rights are inherent to mankind and Dana will respect such fundamental rights at all times.
- 1.2 Dana's commitments to human rights and corporate social responsibility are embodied in its Standards of Business Conduct, its related corporate policies, and the commitment of its employees to "do the right thing" for Dana, its people and the communities where we work and live.

2.0 Purpose and Scope

- 2.1 The purpose of this Human Rights and Sustainability & Social Responsibility Policy ("Policy") is to reinforce the commitments of Dana in its Standards of Business Conduct, and to amplify Dana's commitments to human rights and corporate social responsibility.
- 2.2 This Policy is intended to apply harmoniously with Dana's other corporate policies.
- 2.3 This Policy is intended to apply to Dana Incorporated, the entities that we own, the entities in which we hold a majority interest, and the facilities that we manage. The Company also requires its suppliers to uphold these principles and to adopt similar policies within their own businesses.

3.0 Dana's Responsibilities: Dana recognizes that societal well-being is fundamentally linked to healthy economic conditions with the prospect of gainful employment and financial opportunity. Therefore, our first objective to our shareholders, our employees and our communities is to manage our business successfully to contribute to society's overall economic development and security. In so doing, Dana will:

- 3.1 *Respect People.* Dana will abide by its principles set forth in its Standards of Business Conduct, including its obligation to promote a safe and positive

workplace. Therefore we:

- 3.1.1 Prohibit forced or involuntary labor of all kinds including any form of slavery or human trafficking. We also prohibit child labor as defined in our Standards of Business Conduct.
 - 3.1.2 Work to maintain workplaces that are inclusive and free from discrimination or harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion, or any other status protected by applicable law. We value the diverse backgrounds of our people and work to create an open atmosphere of trust, honesty, and respect.
 - 3.1.3 Work to assure a safe workplace. Our commitment is that our employees return home as healthy as when they arrived at work which is reflected in our health and safety policies. In addition, we are committed to maintaining a workplace that is free from violence, unsafe or disruptive conditions.
 - 3.1.4 Support freedom of association and collective bargaining rights as required by applicable law. Wages and working conditions will be competitive and comply with applicable law.
- 3.2 *Respect the Environment.* Dana's Standards of Business Conduct require Dana to minimize waste, prevent pollution, and conserve energy. In addition to complying with applicable laws concerning the safeguarding of our environment, Dana focuses on environmental sustainability and innovative environmental management in its product design, development and manufacturing activities.
- 3.3 *Respect Communities.* Dana will be a responsible corporate citizen in the communities where we do business and where we live, and we engage with communities on relevant human rights matters such as Dana's utilization of natural resources and health impacts of our operations. We recognize value in communicating with the people who live in our communities, including indigenous peoples as well as other vulnerable and disadvantaged groups. We will contribute to community causes, particularly those focused on education, and encourage our employees to play an active role in bettering our society through individual participation in charitable and humanitarian endeavors.
- 3.4 *Respect Law, Ethics and Fairness.* As required by our Standards of Business Conduct, Dana will abide by the laws and regulations applicable to our activities in all locations where we conduct business. Dana acknowledges that business ethics and a commitment to fair dealing are essential to creating and establishing respect for our company and our business reputation. Ultimately, our company's very existence depends on the reputation that we earn. Therefore, our Standards of Business Conduct, this Policy and other related corporate policies will be regularly reviewed by our leadership and communicated to our employees to help assure that Dana's commitment to business ethics and fairness is understood and appreciated. Dana maintains a

business conduct compliance program that includes training, awareness building, and procedures for reporting possible business conduct violations.

4.0 Communication and Coordination

- 4.1. Human Rights and Sustainability & Social Responsibility matters shall be coordinated through Dana’s Office of Business Conduct. Dana’s Chief Compliance Officer shall regularly assess Dana’s Human Rights and Sustainability & Social Responsibility performance and communicate Dana’s efforts in support of this Policy to Dana’s leadership including to the Dana Board of Directors.
- 4.2. Respect for Human Rights and Sustainability & Social Responsibility are consistent with Dana’s operating philosophy. Dana communicates notable illustrations of our human rights and sustainability & social responsibility to our employees. Such illustrations will serve to honor the commitment of the Dana people and operations engaging in good corporate citizenship efforts and motivate additional activities among others.
- 4.3. Dana will cooperate with reasonable customer and investor requests for information concerning Dana’s Human Rights and Sustainability & Social Responsibility efforts.

Version	Issue/ Revision Date	Description	Approved By
1.0	September 2014	Initial Release	Strategy Board
2.0	May 2017	Update to reflect “ELT” and remove CAO	Executive Leadership Team
3.0	September 2018	Integration of Human Rights and CSR policies	Executive Leadership Team
4.0	March 2020	Policy name change to “Human Rights and Sustainability & Social Responsibility Policy” and modification to Section 4.1	Chief Compliance Officer