

Dana 2024 Joint Modern Slavery Report

1. Introduction

In accordance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, as well as the UK *Modern Slavery Act 2015*, this joint report is made on behalf of the Canadian and UK reporting entities listed in Section 3 below, which are all under the common control of Dana Incorporated ("Dana"), for the financial year ending December 31, 2024 (the "Reporting Period").

Respect for human rights is a fundamental Dana policy. In this joint report, we address the steps we take to prevent and reduce the risks of forced labour and child labour in any part of our business or supply chain, including steps taken during the Reporting Period.

2. Steps to Prevent and Reduce Risks of Forced Labour and Child Labour

Dana recognizes that societal well-being is fundamentally linked to healthy economic conditions with the prospect of gainful employment and financial opportunity. To that end, Dana's policies expressly prohibit forced or involuntary labour of all kinds including any form of slavery and human trafficking and child labour. These expectations apply throughout Dana's entire business and supply chain.

Steps we've taken to prevent and reduce risks of such prohibited activities occurring include:

- Implementing and enforcing internal policies, procedures, and guidelines articulating Dana's human rights commitments and expectations;
- Using a Corporate Supplier Sustainability scorecard for all direct material suppliers to measure safety, diversity, compliance, human rights, and security;
- Utilizing an extensive third-party survey with our top suppliers allowing for deep visibility and analysis of our supply chain, with a specific focus on human trafficking and slavery; and
- Monitoring lists such as the U.S. Department of Homeland Security's Uyghur Forced Labor Prevention Act (UFLPA) Entity List and other published lists of companies identified as potentially having operations in areas known to be at high risk for use of forced and/or child labour, focusing specifically on automotive supply chains, and checking these against our tier 1 direct material suppliers.

During the Reporting Period we took the following steps to further prevent and reduce risks of forced labour and child labour within our supply chains we:

- Collected, reviewed, and analyzed detailed updated ESG data from our top 500 suppliers utilizing the third-party survey tools.
- Replaced some TOP500 suppliers who rated very well in the previous survey with some suppliers based on elevated risk commodity/country combinations.

- Launched a global pilot ESG training program for a test group of suppliers.

Details of the above actions are set out in this report.

3. Structure, Activities and Supply Chains

Dana Incorporated (NYSE: DAN), is a U.S. based company with a history dating back to 1904. It is a world leader in providing power-conveyance and energy-management solutions for vehicles and machinery. The company's portfolio improves the efficiency, performance, and sustainability of light vehicles, commercial vehicles, and off-highway equipment. From axles, driveshafts, transmissions, sealing and thermal products to electrification products including motors, inverters, controllers, e-sealing, e-thermal and digital solutions, Dana supplies nearly every major vehicle manufacturer in the world. As of December 31, 2024, Dana employed approximately 39,600 people and operated in 30 countries. In this Report, references to "Dana", "we", "our" and "us" are references to Dana Incorporated and the reporting entities listed below, collectively.

Within Canada, the following Dana entities are reporting entities under the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act*:

- **Dana Canada Corporation:** with facilities in Cambridge, Chatham, Mount Forest, and Oakville, Ontario, providing manufacturing and assembly of various thermal products for engine transmission oil cooling, charged air cooling, and active warm up applications.
- **Dana TM4, Inc.:** a joint venture between Dana and Hydro-Quebec, with a facility in Boucherville, Quebec, designs and manufactures low and high voltage electric motors, generators, power electronics, and control systems suitable for the automotive, commercial, off-highway, marine, rail, motorsports, and recreational vehicles markets.
- **Dana Laval Technical Center ULC:** located in Laval, Quebec, is a technology center focused on electrification technologies.

Within the UK, the following Dana entities are reporting entities under the UK *Modern Slavery Act of 2015*:

- **Dana SAC UK Limited:** with facilities in Warrington and Scunthorpe and providing complete electro-mechanical and hydraulic solutions for machine drive systems.
- **Dana UK Axle Limited:** based in Birmingham, West Midlands, and producing axles primarily for light vehicle applications.
- **Dana UK Driveshaft Limited:** based in Wellingborough, Northamptonshire, and manufacturing Spicer® brand prop-shafts and drive-shafts and related components for use on commercial and off-highway vehicles.

- **Dana Lindley Technology Centre Limited:** based in Nuneaton, Warwickshire, specializing in transmission and driveline control system engineering; software, hydraulic and electrical actuation systems.
- **Dana TM4 UK Ltd:** based in Chudleigh, Devon, focusing on research and development into hybrid and electric power technology.

The listed Dana entities receive regular support from many Dana business functions, including audit and compliance, finance, human resources, procurement, research and development, and sales. Dana's global business functions set the strategic direction of the Dana group as a whole, and also develop and implement standardised global initiatives, policies and procedures throughout the Dana group. Dana also has regional initiatives, policies, and procedures, to supplement and complement Dana's global activities.

Our Business

Throughout the Reporting Period, Dana's organization was aligned around four operating segments: Commercial Vehicle Drive and Motion Systems, Light Vehicle Drive Systems, Off-Highway and Motion Systems, and Power Technologies. These operating segments maintained global responsibility and accountability for business and commercial activities and financial performance.

Commercial Vehicle Drive and Motion Systems

Dana is an industry leader in the supply of traditional and electrified systems for medium- and heavy-duty commercial vehicles. We help original-equipment manufacturers and end-market customers achieve the best weight, performance, and efficiency, as well as the lowest cost of ownership, no matter the powertrain configuration.

Light Vehicle Drive Systems

Dana is a leading supplier of fully integrated drivetrain and electrified propulsion systems for all passenger vehicles. Working collaboratively with original-equipment manufacturers and the aftermarket, we focus on delivering best-in-class efficiency, maximum durability, and superior ride and handling across the globe.

Off-Highway Drive and Motion Systems

Dana delivers mobile drivetrain and motion solutions for construction, agriculture, material handling, and mining equipment, as well as motion systems for a wide variety of mobile and stationery industrial applications. These customized solutions support vehicles and machines with both conventional and electrified power sources and are designed to deliver innovative technologies that meet customer demands and goals worldwide.

Power Technologies

Dana provides advanced thermal-management and sealing solutions to all end markets in support of conventional, electrified, and fuel-cell platforms. Leveraging the most cutting-edge technology and manufacturing processes, we deliver custom-engineered solutions designed to optimize efficiency and performance.

Our Supply Chains

The Dana entities in Canada and the UK purchase parts, assemblies, components, services, supplies and raw materials from a significant number of suppliers, split across a number of locations and countries. For example, Dana UK Axle Limited primarily obtains products and components from the EU and UK regions and obtains gears and castings from its sister companies in India, Mexico and Hungary, for incorporation into its end product. It also uses a range of suppliers including professional services firms, in the UK. Dana's Canadian operations primarily obtain their products and components from Canada, the US and the EU.

Dana provides suppliers with access to Dana supplier information through its website at www.dana.com/suppliers/. This specifically includes Dana's expectations of its suppliers when doing business with Dana, as well as ethics and business conduct issues more generally. Dana expects all suppliers to familiarize themselves with and adhere to these expectations regarding business conduct.

Our supplier portal "DANA1Source" can be reached at www.dana.livesource.com. This portal allows our suppliers to register as prospective suppliers and it also acts as our internal network for managing existing suppliers and sourcing potential suppliers. In addition, it serves as the direct communication line between Dana and suppliers.

4. Policies, Governance and Due Diligence Processes

We have policies, processes, and governance mechanisms in place that apply to our activities, as well as those of our supply chain.

DANA'S STANDARDS OF BUSINESS CONDUCT outlines Dana's expectations for all employees of Dana, directors, and anyone acting on its behalf, including contractors, consultants, and other third parties, including everyone with whom we conduct business.

In addition to standards addressing health and safety, respect in the workplace, and prohibitions on harassment, Dana's Standards of Business Conduct specifically explains:

"Respect for basic human rights and dignity runs through every aspect of Dana's business. It is a part of who we are and how we conduct business. We are committed to following the laws that ensure fairness and dignity in employment and prohibit abusive employment practices."

Dana employees are responsible for knowing and complying with human rights laws relating to fair employment practices and the prohibition of child labour, forced or compulsory labour, employment discrimination, human trafficking, and sources of minerals from banned countries (i.e., "conflict minerals").

Dana is committed to assessing, preventing, and mitigating the risk of modern slavery (which includes forced labour and child labour) and human trafficking in our business and in any part of our supply chains.

The following policies and procedures demonstrate this commitment:

- [**Human Rights, Sustainability & Social Responsibility Policy**](#) – reinforces the commitments of Dana to amplify Dana’s commitments to human rights and social responsibility and states that we “*prohibit forced or involuntary labor of all kinds including any form of slavery or human trafficking,*” and “*child labor as defined in our Standards of Business Conduct.*”
- [**Supplier Code of Business Conduct**](#) - highlights our ethical approach to our supply chain and expectations for business conduct. Compliance with Dana’s Supplier Code of Business Conduct is a mandatory component of all Dana purchase contracts. This code states that Dana believes that each individual person should determine whether employment is in their best interest, and that children should not be placed in a position of making this determination.

Our Supplier Code of Business Conduct provides: “*Our suppliers may not use, facilitate, or participate in any forced or involuntary labor in any form, including human trafficking or physically abusive disciplinary practices. Dana’s suppliers must strive to respect human dignity and never engage in human rights abuses.*”

- [**Conflict Minerals Policy**](#) – as a company with sales and manufacturing operations throughout the world, we support the sourcing of minerals responsibly, and support ending the violence and human rights violations in the mining of certain minerals from a location described as the “conflict region.”

In addition, Dana respects human rights in all our activities, and we conduct supply chain due diligence, provide grievance mechanisms and remedies. Aligned with the UN Guiding Principles on Business and Human Rights, we are committed to respecting these widely accepted international human rights frameworks and charters and expect suppliers to adhere to the same standards:

- UN Guiding Principles on Business and Human Rights
- UN Declaration of Human Rights
- OECD Guidelines for Multinational Enterprises

Dana has a broad spectrum of policies and procedures relating to grievances, ethics, disciplinary issues, and whistleblowing. We remain confident that these policies are sufficient to allow and encourage any employee, supplier, or agency worker with relevant information about modern slavery or human trafficking issues to come forward without fear of retaliation or reprisal and will allow us to take any necessary corrective action immediately.

Dana maintains a global Ethics and Compliance Helpline, accessible by telephone or online, allowing employees to share their concerns, including anonymously where permitted by law, 24 hours a day, seven days a week, with an independent third-party interview specialist or via a web form. Apart from Dana employees, suppliers are able to bring questions or concerns about Dana’s standards or any matters related to the Supplier Code of Business Conduct to

a specific purchasing email account, or by contacting Dana's Office of Business Conduct by telephone or via email.

All of these Dana policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our business or supply chains.

Due Diligence Processes for Modern Slavery and Human Trafficking

As part of Dana's initiative to identify and mitigate risk, we ensure that, wherever judged appropriate, new suppliers are visited on site to ensure adherence to Dana's strict standards of ethically transparent supply chains.

Further, as stated above, all Dana suppliers must comply with our Supplier Code of Business Conduct as well as our contractor control procedures, which require conducting certain risk assessments.

We also have in place systems to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of modern slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chain; and
- Protect whistle-blowers.

The nature and extent of the information requested of our suppliers will be proportionate to the perceived risk, considering various factors including the volume, frequency, and value of the goods and/or services to be supplied, any unusual time or cost pressures to be imposed by us, the nature of the goods or services and their geographical origin, the supplier's market reputation, and the history of Dana's prior dealings with the supplier.

We use this information to assess the extent of any risk of modern slavery, child labour, or human trafficking in our suppliers' supply chain. As of the date of this statement, these processes have not given us any reason to suspect the existences of child labour, modern slavery, or human trafficking issues in our direct supply chain.

Compliance with these terms and the absence of any grounds for suspicion of such issues are fundamental pre-conditions for any supplier's proposals being taken forward through our procurement processes.

Supplier Adherence to Our Values and Ethics

Our websites and supplier review processes assist us in ensuring that our suppliers understand and abide by our expectations, policies, and procedures from the outset, which include modern slavery and human trafficking issues.

Where appropriate, we also expect suppliers to work with us to address areas where there is perceived to be an unusually high risk of modern slavery or human trafficking, and to take steps to implement remedial action where such issues have been identified in their businesses or supply chains. This is on the understanding always that if we cannot satisfy ourselves that reasonable steps to address those risks or specific instances of modern slavery or human trafficking have been taken, it may be necessary for Dana to sever (or not enter or renew) any contract with that supplier.

Further, Dana expects our suppliers to continually engage with us constructively and responsibly, and to demonstrate their willingness and ongoing commitment to remedy modern slavery and human trafficking risks in a timely way.

5. Assessing and Managing Our Risk

Dana uses a risk-based approach to assess and manage its risk of forced labour and child labour.

We use audits, questionnaires, scorecards, and metrics to prohibit, monitor and follow-up to assess if there are risks in our operations or in our supply chain. Within our operations we have determined that the risks are low, given the locations in which we have operations. Therefore, we have focused our risk mitigation efforts on our supply chains.

The main purpose of our Supplier Sustainability Scorecard, which is what drives a supplier's Sustainability score in its overall Supplier Scorecard, is to collect information on relevant environmental, social, and governance ("ESG") risks in Dana's supply chain, and to prioritize those for further processing. Supply chain ESG risks and opportunities are identified, and more transparency is created through reported qualitative and quantitative data and third-party risk alerts.

Dana uses a Supplier Scorecard for all direct material production suppliers which measures each supplier in areas including performance, cost, financial strength, and partnership criteria, as well as sustainability. The sustainability criteria of the scorecard (the "Supplier Sustainability Scorecard") measures environmental, safety, diversity, compliance, human rights, and security risks through a questionnaire with 40 data points (YES/NO response options). The feedback received through the Supplier Sustainability Scorecard is a key factor in Dana's sourcing decisions. Existing suppliers which do not provide feedback in line with Dana's Standards of Business Conduct are subject to follow-up actions to correct identified deficiencies.

Suppliers are also expected to improve year-over-year on these metrics. The scorecard is used in supplier meetings as a basis for discussion on performance, expectations, and future business opportunities.

In addition to the Supplier Sustainability Scorecard, Dana launched new detailed ESG data collection activity through a third-party partner during 2024. Dana's TOP500 suppliers represent all regions, countries, and commodities within our global supply chain. The TOP500 also includes key steel and aluminum suppliers. Steel and aluminum are considered high risk commodities because of the long supply chains, as well as processing including mining, smelting and manufacturing operations. The TOP500 also covers Aftermarket suppliers with long supply chains and limited visibility. Dana's 2024 survey substituted some TOP500 suppliers who rated very well in the previous survey with some suppliers based on elevated risk commodity/country combination, such as Chinese electronics suppliers, and aluminum suppliers. The data collection activities included surveys specifically focusing on human trafficking and slavery, labour rights, diversity, organizational compliance, climate impact, and resource use. The 2024 survey package included two new surveys; human rights and data protection and privacy.

The overall response rate from our top suppliers in this focus group in 2024 was approximately 57%. The data collected includes information about the supplier's goods produced, locations of operations (with particular emphasis on known high risk regions), relationships with suppliers, worker populations and ages, policies and practices in place to prohibit and combat child labour, and other practices that may demonstrate a potential risk of human trafficking or slavery within its organization and within its supply chain. The additional new human rights survey assesses whether the supplier has appropriate policies around human rights, whether those expectations are communicated, whether systematic procedures to respect human rights are implemented, whether risks are properly identified, assessed, mitigated and documented, whether stakeholders are appropriately trained, and whether grievances are effectively managed. The information is then used to calculate a score of low, medium, or high risk for human trafficking or slavery and for human rights. In 2024, survey results were received and evaluated. We continue to validate and review the data collected in 2025.

Our Canadian facilities purchase flat rolled aluminum for use in our products. We have identified aluminum as a raw material used within our supply chain that carries a potential risk of being sourced from a location considered to have higher risks of forced and/or child labour. Therefore, we have focused our detailed surveys on these suppliers, covering 96% of our spending on such materials, so that we can gain deeper insights and transparency into these suppliers.

We follow up on any concerns arising from the data collection, scorecard, questionnaire and surveys, and determine appropriate follow up measures and corrective actions.

During the Reporting Period, we did not identify any forced labour or child labour in our operations or within our supply chains. We are continuing to evaluate and analyze the data collected through the third-party survey of our TOP500 suppliers initiated in 2025 for potential risks.

During the Reporting Period, Dana has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains and consequently, we have not taken any responsive remediation measures.

6. Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and within our business, Dana continues to provide training and information to our employees, where appropriate. This forms part of the onboarding process for all new employees to ensure they are aware of our stance on preventing modern slavery and human trafficking within our business and our supply chains, and particularly for those employees involved in and at the forefront of the supply chain process and risk, such as procurement and sales, for example. Such training on these and other ethics and compliance issues is also provided from time to time to our human resources, purchasing and senior management teams, both from a business and supply chain perspective. On an annual basis, all salaried employees are required to certify their abidance by our Standards of Business Conduct.

During 2024 Dana launched a global pilot ESG training program for a test group of suppliers. These suppliers were selected based on their ESG responses provided to Dana.

We will continue to evaluate our policies, procedures and practices with respect to modern slavery and human trafficking risks within our business and our supply chains. If our experience or perception of the extent of the present internal or external risks changes, then we will revisit our existing practices. We will review and update this statement to reflect any issues and/or changes made to our policies and procedures in our next annual disclosure.

7. Assessing Effectiveness

Through our Supplier Scorecard and third-party data collection platform, we continue to improve our visibility into our supply chain practices and risk areas, which enables us to assess the effectiveness of our program through score improvements and higher response rates. Through these efforts we are able to assess progress over time with increased visibility into our supply chain practices.

We also continuously assess our program utilizing various industry standards and benchmarking tools, such as:

- The Organization for Economic Cooperation and Development (OECD), United Nations and International Labour Organization guidelines, global reporting standards such as Global Reporting Initiative, Institutional Shareholder Services ESG ratings, The Dow Jones Sustainability Indices, and EcoVadis
- Industry best practices such as Automotive Industry Action Group (AIAG) Guidelines for Automotive

8. Approval and Attestation

Dana UK Entities:

SECTION 54 STATEMENT

This statement has been duly approved by the governing bodies of the Dana UK entities. This statement is issued on their behalf and with their consent. The boards of directors of Dana UK have accordingly delegated authority to the respective signatories, immediately below to sign this statement on their behalf.

Signed by:

Russell Anthony Marsh

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Russell Marsh

Director

Dana SAC UK Limited

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Dale Chiles

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Dale Chiles

Director

Dana UK Axle Limited

DocuSigned by:

Ross Nicholas Brown

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Ross Brown

Director

Dana UK Driveshaft Limited

DocuSigned by:

R. Taylor

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Richard Taylor

Director

Dana Lindley Technology Centre Limited

Signed by:

Seth Metzger

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Seth Metzger

Director

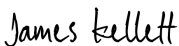
Dana TM4 UK Ltd

Dana Canadian Reporting Entities:

In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the Canadian Reporting Entities listed in this report above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind **Dana Canada Corporation**

Signed by:



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Full Name: James D. Kellett

Title: Director

Date: May 31, 2025

I have the authority to bind **Dana TM4, Inc.**

Signed by:



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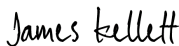
Full Name: Seth Metzger

Title: Director

Date: May 31, 2025

I have the authority to bind **Dana Laval Technical Center ULC**

Signed by:



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Full Name: James D. Kellett

Title: Director

Date: May 31, 2025