



## CORPORATE POLICY

Subject	Department	Number
Political Contributions	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 encourages all employees to vote and be active in the political process. However, you may not use any Dana property or facilities, or the work time of any Dana employees, for political activity, except as outlined in this policy. You should not give gifts or favors to any public officials or conduct politically related activities on Dana's behalf without prior consultation with the Office of Business Conduct. Of course, you may volunteer your services for political purposes, but these services must be rendered outside normal working hours.
- 1.2. This policy defines the limits of Dana's activity in election campaigns, and it imposes limits on employees when they act in the name of the Company. Since the freedom to address political issues affecting Dana varies by country, Dana's policies regarding political contributions are outlined by region.

### 2.0 United States

- 2.1 In the United States, federal law regulates corporations which seek to support a party or candidate in an election involving federal office. Laws governing state and local election practices vary.
- 2.2 If a Dana employee is solicited for a Company contribution to support a candidate, political party or political committee, the following policy shall apply. For purposes of this policy, the term "contribution," includes, but is not limited to: direct financial support; the lending of Dana owned or leased equipment; the use of Dana funds to host functions for candidates or for the purchase of tickets to a fundraising dinner or event; the cost of postage for mailings; and other use of corporate facilities or employee services to benefit a campaign, political party or political committee.
  - 2.2.1 Dana may make corporate contributions to state and local candidates and political parties or political action committees, as approved by the Chief Compliance Officer, provided that the contribution serves the Company's interest and is permissible under applicable federal, state, or local law.
  - 2.2.2 Federal candidates may be invited to Dana facilities or functions to address Dana employees, provided that (1) all applicable Federal Election Commission rules are satisfied and (2) such an event is authorized by the Chief Compliance Officer.

2.2.3 The Company may make “independent expenditures” and fund “electioneering communications”, as these terms are defined and permitted by federal law, in order to advocate the election or defeat of clearly identified federal candidates for office if authorized by the Chief Compliance Officer.

2.2.4 Individual Contributions by Employees – The viability of representative government depends on participation in the political election process. Dana encourages its employees, as individual citizens, to make personal political contributions, within the limits provided under law, to candidates, parties, and committees of their choice. Under no circumstances, however, shall any employee be compensated or reimbursed in any way for any personal political contribution.

### 3.0 International

The political contribution regulations of countries other than the United States are diverse and complex. Therefore, you may not make a political contribution in any country outside of the United States without the advance approval of the Office of Business Conduct who will consult with the Law Department to assure compliance with all applicable national and local political regulations. It should be noted that payments to political candidates, political parties, or “foreign officials” may also be regulated by the U.S. Foreign Corrupt Practices Act (FCPA) and other corruption laws around the world. For more information on these laws, see the Anti-Corruption Policy.

### 4.0 Compliance

4.1 Dana’s Chief Compliance Officer and Office of Business Conduct shall regularly assess that the measures in use to achieve compliance with Dana’s Standards of Business Conduct and this policy are sufficient and sustainable. These measures may include periodic employee certifications of policy compliance and requests for disclosures of non-compliance.

4.2 If you believe that you have violated this policy, or you observe other Dana employees in violation of this policy, you should report this immediately to your Manager, Human Resources representative or to the Office of Business Conduct hotline.

4.3 Any employee who fails to comply with this policy may be subject to discipline.

Version	Issue/ Revision Date	Description	Approved By
1.0	September 2012	Initial Release	Executive Committee
2.0	June 2017	Revision	Executive Leadership Team
3.0	March 2020	Revised to add Section 4.3	Chief Compliance Officer