	<b>CORPORATE POLICY</b>	<b>NO:</b> ADM-1110
	<b>ISO REFERENCE</b>	<b>REV.</b>
<b>TITLE: HUMAN RIGHTS</b>		<b>DATE:</b> 1/17/2019
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<b>ORIGINATED BY:</b> Senior Manager, HR Compliance	<b>FINAL APPROVAL:</b> Vice President, Human Resources	

## 1.0 PURPOSE:

- 1.1 AAM understands that long-term success starts with our values and principled approach to conducting business. This policy strives to make clear and transparent on how we define, approach, govern and support universal human rights and dignity of people throughout our operations, our communities in which we operate, and our global supply chain.

## 2.0 SCOPE:

- 2.1 This policy applies to all of American Axle & Manufacturing, Inc. and its affiliates (collectively, “AAM”). AAM also expects our suppliers and other business partners to uphold these principles and adopt similar policies within their own businesses.

## 3.0 REFERENCE:

- 3.1 United Nations Guiding Principles on Business and Human Rights.

## 4.0 RESPONSIBILITIES:


- 4.1 The Vice President, Human Resources and/or his/her designee to monitor this policy and to ensure compliance.
- 4.2 All Associates are responsible for compliance with this policy.

## 5.0 GENERAL:

### DEFINITIONS

- 5.1 The terms “**Corporation**” or “**AAM**” means American Axle & Manufacturing, Inc., and its affiliates.

- 5.2 The term “**Associate**” means any employee of the Corporation.

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## 6.0 POLICY:

### 6.1 Respect for Human Rights


6.1.1 This policy reinforces our values, principles, policies and practices. This policy is guided by internationally recognized human rights principles and is informed by the United Nations Guiding Principles on Business and Human Rights and its foundational principles for business enterprises, including those expressed in the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

### 6.2 Community and Stakeholder Engagement

6.2.1 We recognize that we are part of the communities in which we operate. AAM Associates are expected to conduct themselves in a socially responsible manner by respecting the cultures and traditions of indigenous people in each country where we operate and by acting with integrity and in good faith in order to merit the trust and support of the community. Our aim is to ensure through open dialogue that we are listening to, learning from and considering their views as we conduct our business. We believe that local issues are most appropriately addressed at the local level. We look to partner with companies and organizations that share our values and position on human rights.

### 6.3 Diversity and Inclusion

6.3.1 We value and advance the diversity and inclusion of the people with whom we work. We are committed to equal opportunity and are intolerant of discrimination and harassment. We work to maintain workplaces that are free from discrimination or harassment on the basis of age, race, color, gender, religion, marital status, sexual orientation, genetic history or information, gender identity or expression, disability, protected veteran status, national origin, or other characteristic protected by law. AAM is

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committed to providing a work environment that is free from all forms of unlawful or unwanted harassment or discrimination.

We do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment is prohibited in the workplace and in any other work-related activity.

#### 6.4 Freedom of Association and Collective Bargaining

6.4.1 We respect our associates' right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment. Where associates are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. AAM is committed to bargaining in good faith with such representatives.


#### 6.5 Health and Safety in the Workplace

6.5.1 The health and safety of our associates is the paramount importance. Our policy is to provide a safe and healthy workplace and comply with applicable health and safety laws and regulations, as well as internal requirements. We work to provide and maintain a safe, healthy and productive workplace in consultation with our associates, by addressing and remediating identified risks of accidents, injury and health impact. Our open door policy provides associates with a means of airing concerns with management, fostering a climate of openness, responsiveness, and a free exchange of views.

#### 6.6 Workplace Security

6.6.1 The safety and protection of our associates is our highest concern. AAM has taken steps to help prevent incidents of violence from occurring in the workplace. Prompt and remedial action will be taken against anyone who engages in any inappropriate and/or unlawful act or behavior.

#### 6.7 Forced Labor and Human Trafficking

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6.7.1 We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking.

6.8 Child Labor

6.8.1 We prohibit the employment of children where the age of employment is not in accordance with applicable laws.

6.9 Work Hours, Wages and Benefits

6.9.1 The work hours, wages and benefits of our associates are comparable with those paid and offered by other employers in our industry, and also in accordance with applicable collective bargaining agreements. We monitor these matters throughout the industry and comply with applicable laws.

6.10 Monitoring and Reporting

6.10.1 We maintain several reporting mechanisms and have strong anti-retaliation policies. We monitor our operations for potential violations and take action if violations occur, up to and including termination of employment. Should we become aware of violations among our supply base or other business partners, we will take appropriate action, up to and including termination of employment or contract. Associates, suppliers, contractors, or others can report any incidents or concerns using AAM's toll-free Business Ethics Line and speaking to trained, non-AAM personnel who are available 24 hours a day, seven days a week, or via our web-based reporting system. We disclose on our website and elsewhere our values, principles, policies and practices that this policy reinforces.

**7.0 ACCOUNTABILITY:**

7.1 All Officers, Vice Presidents, Directors and Managers are responsible for the monitoring and maintenance of this policy.