

	CORPORATE POLICY	NO: ADM-1110
	ISO REFERENCE	REV: 4
TITLE: HUMAN RIGHTS		DATE: 11/27/2024
		PAGE: 1 of 4
ORIGINATED BY:  Director, HR Compliance		FINAL APPROVAL:  Senior Vice President, Human Resources & Sustainability

1.0 PURPOSE:

- 1.1 AAM understands that long-term success starts with our values and principled approach to conducting business. This policy outlines 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 American Axle & Manufacturing, Inc. and its affiliates (collectively, "AAM"). AAM also expects our suppliers and other business partners to adhere to the standards outlined in this policy and adopt similar policies within their own businesses.

3.0 REFERENCE:

- 3.1 United Nations Guiding Principles on Business and Human Rights, International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the Organisation for Economic and Co-operation Development (OECD) Guidelines for Multinational Enterprises.

4.0 RESPONSIBILITIES:

- 4.1 The Senior Vice President, Human Resources & Sustainability and/or his/her designee is responsible for monitoring and ensuring compliance with this policy.
- 4.2 All Associates are responsible for compliance with this policy.

5.0 GENERAL:

DEFINITIONS

- 5.1 The terms "**Corporation**" means American Axle & Manufacturing, Inc., and its affiliates.
- 5.2 The term "**Associate**" means any employee of the Corporation.

	CORPORATE POLICY	NO: ADM-1110
	ISO REFERENCE	REV: 4
TITLE: HUMAN RIGHTS		DATE: 11/27/2024
		PAGE: 2 of 4
ORIGINATED BY: Director, HR Compliance		FINAL APPROVAL: Senior Vice President, Human Resources & Sustainability

6.0 POLICY:

6.1 Respect for Human Rights

6.1.1 AAM is committed to respecting the universal human rights of individuals throughout our operations and in the communities where we operate. This commitment is aligned with the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the Organisation for Economic and Co-operation Development (OECD) Guidelines for Multinational Enterprises.

6.1.2 Rights of Minorities and Indigenous Peoples: We respect the rights of local communities to decent living conditions, education, employment, social activities and the lands on which they live, with consideration for the presence of vulnerable groups.

6.1.3 Land Rights and Forced Eviction: We avoid forced eviction and the deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters.

6.2 Community and Stakeholder Engagement

6.2.1 We respect the cultures and traditions of indigenous people in each country where we operate. We act with integrity and in good faith to gain the trust and support of the communities where we operate. We look to partner with companies and organizations that share our values and position on human rights.

6.3 Diversity and Inclusion, Harassment and Discrimination

6.3.1 We value and advance the diversity and inclusion of the people with whom we work. We are committed to providing a work environment that is free from all discrimination or harassment, including that based on age, race, color, sex, religion, marital status, sexual orientation, genetic history or information, gender identity or expression, disability, protected veteran status, national origin, ethnicity, or other characteristic protected by law. We are committed to the protection of women's rights and providing equal opportunities for all Associates.

	CORPORATE POLICY	NO: ADM-1110
	ISO REFERENCE	REV: 4
TITLE: HUMAN RIGHTS		DATE: 11/27/2024
		PAGE: 3 of 4
ORIGINATED BY: Director, HR Compliance		FINAL APPROVAL: Senior Vice President, Human Resources & Sustainability

We do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind.

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 bargaining in good faith with their union representatives.

6.5 Health and Safety in the Workplace

6.5.1 The health and safety of our Associates is of paramount importance. We are committed to providing and maintaining a safe and healthy workplace, including safe drinking water and sanitation, that complies with applicable health and safety laws and regulations. We encourage Associates to raise any health or safety workplace concerns with management, fostering a climate of openness, responsiveness to, and remediation of health and safety issues.

6.6 Workplace Security

6.6.1 The safety and protection of our Associates is our greatest 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

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.

	CORPORATE POLICY	NO: ADM-1110
	ISO REFERENCE	REV: 4
TITLE: HUMAN RIGHTS		DATE: 11/27/2024
		PAGE: 4 of 4
ORIGINATED BY: Director, HR Compliance		FINAL APPROVAL: Senior Vice President, Human Resources & Sustainability

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 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 mechanisms for reporting potential issues and suspected violations. These include a toll-free business ethics hotline operated by an independent third party, which provides Associates, suppliers, contractors, or others with a 24/7, confidential means to report any incidents or concerns by phone or our web-based reporting system. Should we become aware of violations among our Associates, supply base, or other business partners, we will take appropriate action. We maintain strong anti-retaliation policies that prohibit retaliation against any individual who, in good faith, reports a suspected violation.

7.0 ACCOUNTABILITY AND TRAINING:

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

7.2 All new and current salaried associates must complete annual Code of Conduct training, which covers human rights topics.

8.0 REVISION HISTORY:

Date	Revision #	Reason for Revision	AAM Associate	Approver
10/31/2024	3	Section 6.3.1. Update Diversity and Inclusion, Harassment and Discrimination language. Section 3.1 Update references to include OECD	Jackie Jones	Terri Kemp
11/27/2024	4	Section 6.1.1 Included OECD commitment	Jackie Jones	Terri Kemp