



CODE OF BUSINESS CONDUCT





#TeamAAM:

'Doing What's Right' has been our guiding principle for long-term success since Richard E. Dauch co-founded AAM in 1994. Upholding this mindset through both our actions and words has allowed us to grow quickly and profitably into the global company we are today — and it's just as important now as it was at the beginning.

Delivering POWER. It's what we stand for and who we are. Our Code of Business Conduct is based on these two words and includes our Cultural Values, our Strategic Principles and our Compliance Policies. Each and every one of us is accountable to uphold them every day in the work we do.

This Code is intended to give you guidance, but it is only a starting point. If you are ever uncertain of the right course, talk to your manager, our General Counsel or contact the [AAM Business Ethics Line](#). As you know, our culture of Teamwork means you should never feel alone when facing an ethical dilemma.

At AAM, Integrity — the Power of Doing What Is Right — is paramount. As many of you have heard me say, I would much prefer that you do the more difficult right than the easier wrong. Doing what is right is not always the easiest choice, nor the most popular, but it is the AAM way, and it's one that we should all be proud of.

Please review the contents of our Code and continue to apply it to your work. Please also consider the important role your actions play in upholding AAM's reputation of integrity, quality, technology leadership and operational excellence.

Sincerely,

A handwritten signature in black ink that reads 'David C. Dauch'.

David C. Dauch
Chairman & Chief Executive Officer





TABLE OF CONTENTS

1: OUR CODE

6

- Responsibilities of all Our Associates and Leaders
- Asking Questions, Raising Concerns
- Zero Tolerance for Retaliation

2: HOW WE WORK

7

- The Health, Safety and Well-Being of Our Associates
- We Embrace Diversity, Equity and Inclusion
- DEI Statement
- Mutual Respect
- DEI Strategic Pillars
- AAM's 2+1 Global DEI Program
- Associate Resource Groups
- Call to Action
- Respect for Human Rights
- We Prevent Violence
- We Prevent Cybersecurity Incidents

3: DOING WHAT'S RIGHT

10

- We Avoid Conflicts of Interest
- We Provide High-Quality Products and Services
- Sustainability Priority Topics
- We are Committed to Honest and Ethical Business Practices
- We Conduct Reasonable Hospitality
- Working Ethically with Government Officials
- We Prevent Bribery

3: DOING WHAT'S RIGHT (continued)

14

- We Comply with International Business Regulations
- Export Controls and Customs Laws
- Insider Trading
- We Comply with all Applicable Laws
- We Respect Political Process

4: PROTECTING OUR COMPANY

16

- We Create Business Records that Reflect the True Nature of Transactions and Events
- We Use Our Resources Responsibly
- Company-Supplied Communication Assets
- We Value Product Integrity
- We Do Not Tolerate Possession or Use of Alcohol, Illegal Drugs or Controlled Substances
- We Respect Associate Privacy
- We Promote the Safe Use of Technology
- We Value and Protect Our Ideas
- Intellectual Property Rights of Others
- Industrial Espionage
- Business Ethics Line
- We Expect Ethical Behavior from Our Suppliers
- We Use Social Media Responsibly
- Speaking on Behalf of AAM

5: RESOURCES

22

- Closing Thoughts
- Ethics Line Contacts

[OUR CODE](#)[HOW WE WORK](#)[DOING WHAT'S RIGHT](#)[PROTECTING OUR COMPANY](#)[RESOURCES](#)

BRINGING THE FUTURE FASTER

AAM was built to deliver POWER, but we live to create opportunity – within our company and in the world around us. We don't stand still and let the market come to us, we innovate new ways to drive, forge and engineer it.

We create opportunities for you to succeed, to learn, to grow, and to be your authentic self. Across 18 countries, 4 continents, over 80 facilities and with over 20,000 Associates, every one of us is a part of this story.

We go beyond specs, measuring ourselves against our own higher standards. We've never met crisis, only moments of golden opportunity. If you're here, you know what we mean.

We'll never stop seeing opportunities others don't. And we'll never stop doing things that make us a better company, for anyone who works with us, or for us.

Most of all, we'll never stop Bringing the Future Faster.



BRINGING THE FUTURE
FASTER



CULTURAL VALUES

The Cultural Values of AAM are what we expect each Associate to embrace. These Values are what drive performance in all that we do at AAM.

INTEGRITY

POWER OF DOING WHAT IS RIGHT

TEAMWORK

POWER OF WORKING TOGETHER

RESPONSIBILITY

POWER OF ACCOUNTABILITY

EXCELLENCE

POWER OF DRIVING PERFORMANCE

LEAN

POWER OF EFFICIENCY

EMPOWERMENT

POWER OF LEADERSHIP

STRATEGIC PRINCIPLES

The Strategic Principles of AAM are the foundation of our business model. These Principles build value and collectively position AAM as a global leader.

QUALITY

POWER TO EXCEED EXPECTATIONS

TECHNOLOGY

POWER TO INNOVATE

GLOBAL

POWER TO PARTNER

BALANCE

POWER TO SUSTAIN

COMPETITIVENESS

POWER TO GROW

PROFITABILITY

POWER TO INVEST



RESPONSIBILITIES OF ALL ASSOCIATES AND LEADERS

Making a difference from day one with #TeamAAM starts and ends with our valued Associates and leaders. Our Core Values and Strategic Principles provide the guideposts for all AAM Associates to follow, but beyond that, we all play an incredibly important role in how we conduct ourselves in the course of doing business.

This Code of Conduct is designed to help ensure all AAM Associates are aware of and comply with company policies and applicable laws. Your continued commitment in adhering to this Code of Conduct ensures AAM continues to deliver the quality, innovation and excellence that our customers and stakeholders expect. Some of these responsibilities are outlined below:

- Lead by example. Act with integrity at all times.
- Understand AAM's policies and procedures pertinent to your responsibilities.
- Act within the law at all times. If you are not sure, ask. In particular, members of our General Counsel are always available to help you understand the law as it applies to any question you may have.
- Encourage reporting of all violations of the Code and assist fully and timely in any investigations, as requested.

ASKING QUESTIONS, RAISING CONCERNS

If you suspect that there has been a violation of AAM's policies, the Code or the law, report it by contacting your manager, our General Counsel or your Human Resources representative. For those who may be uncomfortable reporting through established internal channels, reports can be made by calling 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. Most countries encourage anonymous reporting; therefore, our systems allow for anonymous reporting where permitted. Contact information for the toll-free number and web-based reporting system may be found on page 22. Unless it is part of your assigned job function, do not conduct your own



investigation. All investigations are confidential and conducted on a “need to know” basis.

In some locations outside of the United States, anonymous reporting may not be allowed or reporting of suspected violations may be limited to certain areas of concern. If there are limitations that exist in your location, our Ethics Line complies with the requirements of local laws. If you have any doubts about local requirements or making a report in general, please contact our General Counsel.

ZERO TOLERANCE FOR RETALIATION

AAM will not tolerate retaliation against Associates who act in good faith by reporting suspected illegal acts or unethical behavior. Retaliation is a violation of the AAM Code of Conduct. Individuals who retaliate will be subject to discipline and possible termination.

THE HEALTH, SAFETY AND WELL-BEING OF OUR ASSOCIATES IS OUR FIRST RESPONSIBILITY

Every day, in every AAM facility, we strive to create a safe workplace that protects the physical and psychological health of our Associates. AAM's commitment to safety is unwavering and is upheld by our facilities across the globe. Our Associates work diligently every single day to create and maintain safe working environments for everyone. We extend this commitment to our subsidiaries, suppliers and contractors.

AAM's S⁴ Safety program (S⁴), an integral part of our Safety Policy, is a comprehensive Environmental, Health and Safety (EHS) program that powers our safety culture with the primary goal of achieving compliance with all internal and external requirements and regulations. S⁴ focuses on developing, engaging, monitoring and continuously educating #TeamAAM and all customers, visitors and guests on the standardized procedures that are vital to our workplace safety. S⁴ also provides a structured, data-driven approach toward continuous improvement as it drives the key themes of our safety program: Personal, Positive and Proactive.

Q & A

How can I recognize if someone's behavior is actually a form of intimidation or harassment?

Intimidation and harassment can include any behavior that creates an intimidating, hostile or offensive work environment and is based on protected personal characteristics. Examples include, but are not limited to:

- Derogatory comments, including gestures or jokes, based on legally protected characteristics
- Sexual advances
- Verbal or physical threats
- Offering employment benefits in exchange for sexual favors
- Actual or threatened retaliation for opposing intimidation or harassment or for reporting violations of the Code or other company policies





OUR CODE

HOW WE WORK

DOING WHAT'S RIGHT

PROTECTING OUR COMPANY

RESOURCES

WE EMBRACE DIVERSITY, EQUITY AND INCLUSION

In 2020, we elevated our commitment to diversity, equity and inclusion by creating and publishing our DEI Statement, and in 2022, we established our Mutual Respect Statement. Both statements have been translated into 17 languages for our Associates around the world. These statements were the first steps in our efforts to promote a deeper commitment to DEI — one that we hope to convey through ongoing actions, initiatives and programs.

By fostering a safe work environment where everyone feels comfortable bringing their whole selves to work, we will strengthen relationships and build trust.

DEI STATEMENT

At AAM, we believe diversity drives creativity. We believe an equitable and inclusive culture encourages, supports and celebrates the unique voices of our global workforce. AAM is committed to listening, learning and taking action that will move the company and our communities forward.

MUTUAL RESPECT

This statement is reviewed at the start of meetings to reaffirm our commitment to positive, collaborative relationships and to encourage and welcome all voices during our business discussions. Read our statement in the image on the right.

DEI STRATEGIC PILLARS FOR BUILDING AN INCLUSIVE CULTURE

AAM has developed a comprehensive Strategic Roadmap for DEI. This roadmap includes five pillars that focus on our initiatives for building a safe and inclusive culture.

AAM's Strategic Pillars:

- DEI Upskilling
- Safe and Inclusive Environment
- Equitable Talent Management and Inclusive Benefits and Policies
- External Engagement
- Leadership Ownership and Accountability Measures



DEI Strategic Pillars



AAM's Leadership Team reports progress on the pillars to our Board of Directors quarterly. 8

AAM'S GLOBAL DEI 2+1 PROGRAM

AAM launched our Global DEI 2+1 Program to enable global participation in our DEI journey. All Associates are asked to help improve our representation of women in our global workforce and to work on valuing our differences. In addition to the global topics, each country selected a third country-specific topic to help guide their DEI journey.

To drive accountability, AAM publishes updates to our 2030 DEI Demographic Goals in our sustainability report annually.

ASSOCIATE RESOURCE GROUPS

Associate Resource Groups (ARG) are Associate-led networks within AAM that are formed based on shared experience, characteristics or backgrounds. ARGs focus on four core impact areas — Career, Culture, Community and Company — to create impact at AAM and in the communities where we live and work.

CALL TO ACTION

At AAM, we expect our Associates and suppliers to exhibit inclusive behaviors and engage in mutual respect during business interactions. Associates should participate in DEI learning opportunities and are encouraged to participate in ARGs. Our strength in driving innovation is POWERed by diversity. That includes valuing differences, respecting each other and supporting those Associates that may have different opinions and perspectives. Together, it makes us an even stronger AAM.

RESPECT FOR HUMAN RIGHTS

Our policies and programs related to human rights are guided by internationally recognized human rights principles and are 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.

2 - Global DEI Topics

Valuing Differences

Gender

1 - DEI Country Topic

Age / Generation

Communication Style

Physical / Mental Ability

Sexual Orientation / Gender Identity

Race and Ethnicity

Religion and Spirituality

Each Country selected one DEI Country Topic and established 2030 goals

AAM's Current Associate Resource Groups



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. 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. We also prohibit the employment of children. We look to partner with companies and organizations that share our values and position on human rights.



WE PREVENT VIOLENCE

Acts or threats of violence are not tolerated. Weapons are prohibited within our facilities, including in parking lots and in Associate vehicles while on AAM property or at any AAM-sponsored event.

WE PREVENT CYBERSECURITY INCIDENTS

Our internal computer systems and networks are a vital part of how we run our business. Hackers, unethical competitors and others are continually trying to gain access to our systems to steal confidential information and disrupt our business. AAM employs sophisticated software, hardware, processes and third parties to protect our systems, but one click on a malicious link by an AAM Associate can render even the most sophisticated defenses useless. AAM Associates should always follow company policies regarding the use of company computer systems and best practice recommendations regarding cybersecurity from the IT organization.

WE AVOID CONFLICTS OF INTEREST

Sometimes our personal circumstances can inadvertently affect our objectivity in performing our duties and responsibilities to AAM. Even the perception of a conflict could negatively affect you and our company, causing severe reputational harm. You are expected to disclose any potential conflicts to ensure transparency and to determine whether there is an actual conflict. Your disclosure of a potential conflict provides your management with information to clarify potential conflicts and resolve as appropriate.

All salaried Associates are required to complete the Conflict of Interest Acknowledgement annually (notification will be sent to you via email). Associates must also advise management whenever there is a change in condition that may indicate a conflict of interest.

Generally, a potential conflict falls into one of several categories:

- Financial (e.g., financial interest in a company that does business with AAM)
- Professional (e.g., hiring a family member as an Associate or a supplier)



- Personal (e.g., a personal relationship with a subordinate, or accepting employment or compensation that is inconsistent with AAM's interests)
- Misuse of property (e.g., using AAM property for personal benefit)

WE PROVIDE HIGH-QUALITY PRODUCTS AND SERVICES

Our reputation for excellence is in part derived from the high-quality products and services we provide. Our business, reputation and success depend on our commitment to quality and regulatory compliance. We make sure that issues related to quality are addressed timely, including escalation, when appropriate, to the executive team member responsible for quality and customer satisfaction.

SUSTAINABILITY PRIORITY TOPICS

At AAM, we are focused on driving continuous improvement in the sustainability areas most important to our company, our stakeholders and our communities. We actively review and update our goals and progress in these key areas, ensuring they reflect our current business profile, industry norms and stakeholder expectations.

We strive to create sustainable long-term value for our shareholders and other key stakeholders by delivering high-quality products on time and managing the profitable growth of the company in balance with critical environmental, social and governance objectives. These include fully integrating climate strategy objectives into our strategic business planning process, achieving net zero carbon in our global operations (by 2040) and promoting a more diverse, equitable and inclusive workplace for all Associates.

With the support of a third-party sustainability advisor, AAM completed a Sustainability Materiality Assessment in the fourth quarter of 2022. The results of the assessment determined material and priority topics we will focus on in 2023 and beyond as we evaluate our strategy, develop additional long-term commitments and prioritize our sustainability-related initiatives.

The methodology we used to select these topics is described in our [2022 Sustainability Report](#).



ENVIRONMENTAL

- Energy and Emissions*
- Water and Wastewater Management
- Waste and Hazardous Materials Management
- Sustainable Product Development
- Climate-Risk Management



SOCIAL

- Associate Health, Safety and Wellbeing*
- Talent Attraction and Retention*
- Diversity, Equity and Inclusion*
- Human Rights
- Community Engagement



PRODUCT

- Innovation Technology and Electrification*
- Product Safety and Quality



SUPPLY CHAIN

- Supply Chain Engagement and Resiliency*



GOVERNANCE

- Ethics and Compliance*
- Governance and ESG Oversight

*Priority Topics





WE ARE COMMITTED TO HONEST AND ETHICAL BUSINESS PRACTICES

We win business by competing lawfully in the marketplace. Our reputation as an honest competitor is very important. Our commitment to fairness includes respecting the rights of our competitors, as well as the expectation that our competitors will respect our rights. We compete aggressively based on the merits of our products and services. We do not make misleading statements about our competitors' products or services, but rather focus our efforts on the benefits our customers receive by partnering with AAM.

Competition laws regulate our relationships with our customers as well as our competitors. As a general rule, we limit our contact with competitors. We do not discuss our pricing, bids, terms of sale or territories with any competitor. Collusion among competitors is illegal in almost all countries and violations carry serious penalties such as fines and imprisonment. Suppliers can also be competitors. Use extra caution in such situations. The laws related to fair competition are many, complicated and vary by region. Questions about compliance should be directed to our General Counsel.

WE CONDUCT REASONABLE HOSPITALITY

Hospitality in the form of gifts and entertainment is common in the business setting. We use moderation and discretion when giving or accepting them. Items of nominal value, such as cab fare, reasonable meals and entertainment expenses or company promotional items are generally acceptable. The larger the gift, however, the more likely it will be viewed as given with an improper purpose. We may not give or accept any gift if it is intended, or could be perceived, to influence business or governmental decisions or actions. For example, payment of travel costs associated with training or facility inspections are generally viewed as appropriate, even where modest entertainment is provided. However, including the travel costs of accompanying family members or friends, or payment for lavish meals or sightseeing trips, would not be appropriate. We also take it upon ourselves to understand any limitations placed on our customers or others with whom we interact to be sure we abide by their policies as well. For more detailed guidance on our rules regarding hospitality, please review the Gifts & Entertainment attachment to our Conflict of Interest Policy.

Q & A

I invite a customer to a sporting event every year in his hometown. This year, I thought it would be fun to take him to a different event that is out of town, over a weekend. Some travel, lodging and meals would be involved. I know he would appreciate it, and the extended time together would allow us to really build a good relationship. Is this acceptable?

No. Such hospitality goes beyond what is deemed "reasonable" under normal business conditions. You should also be aware that such hospitality is against the rules of many of our customers. Not only do we want to follow our own rules, we want to honor the rules on hospitality established by our customers. Know them and abide by them.



WORKING ETHICALLY WITH GOVERNMENT OFFICIALS

If any disclosure about AAM is requested by a government or law enforcement officer, you must promptly notify and consult with our General Counsel. It is our policy to deal honestly with government representatives and to comply with reasonable and valid government requests for information and processes. Associates must be truthful in their dealings with the government and must not direct or encourage anyone to give false or misleading information to any government representative. If you believe that AAM records are being altered, destroyed or otherwise handled inconsistently with the applicable record retention policy, you should report this immediately to our General Counsel. If any government official seeks to inspect an AAM facility, you should notify your supervisor or manager immediately.

WE PREVENT BRIBERY

We never offer or make bribes to secure business. Anything of value can be considered a bribe if it is intended or could be perceived to influence a business or governmental decision or action. Bribes are not just money. Trips, jobs, favors and similar valuable considerations can be bribes.

We are committed to complying with anti-corruption laws that prohibit bribes, kickbacks or other corrupt actions to obtain or retain business or obtain improper advantage. Many countries in which we do business have specific laws against bribery. The United States Foreign Corrupt Practices Act, UK Bribery Act, Brazilian Clean Companies Act and Indian Prevention of Corruption Act are prominent examples of such laws. All AAM Associates, as well as our Board of Directors, are expected to comply with applicable anti-corruption laws.

Our Supplier Requirements Manual mandates that third parties are expected to follow our Code of Business Conduct when acting on our behalf. Suppliers, agents and consultants hired to act on AAM's behalf are prohibited from directly or indirectly receiving or offering any form of bribe, kickback or other corrupt payment, to or from AAM Associates, public officials or other private or public actors, with the intention to obtain or retain business or any other improper advantage.

Q & A

Who are government officials?

Examples of government officials include, but are not limited to:

- Employees of government agencies — for instance, tax and customs inspectors and police officers
- Employees of government-owned or government-controlled companies or public international organizations
- Political parties, officials, candidates and office holders



WE COMPLY WITH INTERNATIONAL BUSINESS REGULATIONS

As our business becomes more global and complex, full compliance with import and export regulations becomes a common issue. Accurate classification, value and country of origin documentation is required for all cross-border transactions.

Many countries maintain trade sanctions restricting with whom we may do business or where we may do business. We should never engage in a cross-border transaction without first having a full understanding of how these trade laws affect us. Even the shipment of test parts, software or data across a border is highly regulated. Depending on the circumstances, an export license may be required before we can:

- Conduct a plant tour with a foreign national present.
- Provide training courses or materials overseas or to foreign nationals visiting your location (for example, a foreign national visiting in the U.S.).
- Send electronic information to a foreign national.
- Present at a meeting with a foreign national present.

From time to time, the U.S., the European Union, and other countries will impose trade embargoes and other trade restrictions against specific countries. We will abide by all such restrictions.

U.S. law also prohibits us from participating in any foreign boycott or embargo that is not approved by the U.S. government. We must report any requests to participate in boycotts or embargoes to the U.S. authorities. Not doing business with a “blacklisted” company is one example. Another is the Arab League boycott of Israel. Any such request must be reported immediately to our General Counsel.

Sales of products or services intended for military purposes receive special attention. If any such transaction is contemplated, prior review is required before any discussions are conducted or actions taken. Please contact our General Counsel for guidance.





WE COMPLY WITH EXPORT CONTROLS AND CUSTOMS LAWS

The ability to ship internationally is critical to our success. The United States and other governments impose legal restrictions on exports, re-exports and imports of goods. Accordingly, we comply with all U.S. export control laws, as well as applicable laws of countries in which we do business.

Export controls apply not only to the physical shipment of goods, but also to the transfer or release of technical information, software or source code to foreign nationals in the U.S. or abroad. We always obtain export licenses when required by U.S. law or by the laws of countries in which we do business.

The U.S. and other governments impose trade sanctions or embargoes on certain countries and regions as a matter of foreign policy. We will not conduct business with any sanctioned or embargoed regions unless the transactions are permissible under the laws of the U.S. and other applicable jurisdictions. Governments also prohibit business transactions with certain restricted parties that have been identified as being involved in terrorist and other illegal activities. We will not conduct business with any restricted parties.

WE DO NOT PERMIT INSIDER TRADING

Insider trading can be defined as:

- Trading stock (or encouraging another to do so) while possessing “material non-public information” about AAM.
- Disclosing “material non-public information” about AAM to others in violation of the law.
- Acting in a manner which is likely to manipulate the market price of AAM stock or related financial instruments or which otherwise misleads purchasers or sellers of such instruments.

Insider trading is illegal in most countries. Even if you do not personally benefit from the violation, the penalties can be severe to both you and AAM. “Material non-public information” is information that is not publicly available and that a reasonable investor would likely consider important to know before making an investment decision or would likely have a substantial effect on the price of a company’s securities.





WE COMPLY WITH ALL APPLICABLE LAWS WHEREVER AAM DOES BUSINESS

We operate businesses in many countries and are subject to the laws of many jurisdictions. Some laws extend beyond the border of a specific country. For example, U.S. laws concerning imports and exports, bribery and trade sanctions apply not only to our U.S. operations, but to our operations around the world. We are each responsible for following all of the laws that apply to our businesses. This obligation extends to our activities with others. At no time will we act in a manner that would assist another party to engage in illegal activity. We cannot take actions which we know, or ought to know, will assist others in violating the law. If at any time you have any concerns whether a certain activity is legal, contact our General Counsel.

WE RESPECT THE POLITICAL PROCESS

Campaign finance laws in the U.S. and other countries restrict the ability of companies like AAM to support political candidates and causes. While our Associates may personally support political candidates and causes as they see fit, AAM Associates and Board members may not commit AAM to contribute money, services, use of facilities, fundraising sponsorships or support a political candidate or cause without prior written approval, nor must any such support be provided on behalf of AAM.

WE CREATE BUSINESS RECORDS THAT REFLECT THE TRUE NATURE OF TRANSACTIONS AND EVENTS

We create thousands of business records every day. We rely on their accuracy to analyze and report our operations and make sound business decisions. It is also possible that our business records could end up being disclosed through litigation, government investigation or stories in the media.

We never deliberately create a false record, falsify an existing record or try to disguise what really happened. We also stick to the facts we know. Exaggeration, speculation and legal conclusions should be avoided. If you have concerns regarding legal or financial exposure, it is best to first speak with your supervisor and get legal guidance from our General Counsel before you commit your opinions to print.

We also follow lean principles and act in accordance with applicable record retention schedules and policies. If there is a lawsuit or investigation, you may be required to produce documents for a specified period of time, and it is important that you follow any instructions in such an event.





Our business records are used when we file our financial statements, tax returns and other regulatory and statistical reports. We comply with U.S. Generally Accepted Accounting Principles (GAAP) and local accounting rules for our non-U.S. financial reporting requirements. Any Associate who supplies information for financial or tax purposes must provide it in a timely manner and certify the accuracy of the information and compliance with AAM policies. Integrity in financial reporting and public disclosure reinforces our reputation for honesty in the financial community.

We have a system of internal controls designed to monitor the integrity of our business records and, in turn, our financial reporting. These internal controls require Associates to:

- Maintain adequate documentation to provide a complete, accurate, timely and auditable record of each transaction.
- Safeguard all physical, financial, informational and other assets.
- Provide timely reviews, forecasts and assessments to management.

Although the Ethics Line can be used to report concerns of many kinds, it is specifically intended to allow for the confidential and anonymous reporting of financial irregularities.

WE USE OUR RESOURCES RESPONSIBLY

We must all protect and use our AAM assets responsibly. These assets include, but are not limited to, financial assets, property, equipment inventory, supplies, information, computers, internet services, telephones and e-mail systems. These assets are provided to us so that we may do our jobs, and they should be used within authorized limits for that purpose. When using company-provided assets off-site, care must be taken to protect such assets from damage or theft. We should use strong passwords and follow all AAM security policies and procedures.



Q & A

A customer asked us to change an invoice to make it look like a sale took place on an earlier date than it actually did. The change is easy to make and it will really help our customer. Can I go ahead and make the change?

No, you cannot. Our invoices are business records and should reflect the actual date on which the sale took place. Changing the date on the invoice would create a false and misleading record, and your actions may assist the customer in breaking the law.



WE USE COMPANY-SUPPLIED COMMUNICATION ASSETS FOR COMPANY PURPOSES

Our electronic communications systems, including the equipment and all stored data, are the property of AAM. These resources are provided to allow us to perform our jobs efficiently. In order to protect the integrity of AAM's information technology systems and the data contained therein, all messages transmitted through the company's internet connections and messaging systems are AAM's property and are subject to monitoring by authorized Associates. You should have no expectation of privacy in connection with the use of these systems and the information transmitted through such systems or stored therein.

We do not use these systems or equipment to access or create material that is illegal, offensive, threatening or obscene. We use such systems and equipment for business purposes. Any incidental non-business uses must not interfere with work responsibilities or productivity and must not conflict

with applicable AAM policies. AAM reserves the right to delete any information from AAM-owned systems and equipment without advance notice to the extent permitted by law.

WE VALUE PRODUCT INTEGRITY

It is our job, every day, to produce high-quality vehicle components for our customers. Ensuring product integrity is an essential part of AAM's Cultural Values. Our expectation is that you will speak up when becoming aware of a concern regarding AAM's product. Ensuring we have a culture in which Associates know they can bring such issues forward is an essential part of our role in putting the highest quality vehicles on the road.

You can bring product integrity concerns to the attention of AAM's Product Integrity Committee for further analysis and investigation. If you feel that your concern is not being addressed through this established process, you may report your concern via our Business Ethics Line.



Reports can be made by calling 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. Both systems allow for anonymous reporting where permitted by local law. Contact information for the toll-free number and web-based reporting system may be found on page 22.

WE DO NOT TOLERATE POSSESSION OR USE OF ALCOHOL, ILLEGAL DRUGS OR CONTROLLED SUBSTANCES

For everyone's safety, using, possessing or being under the influence of alcohol, illegal drugs or controlled substances without a prescription on AAM property or while engaged in any job-related activity is strictly prohibited. Being at work in an unfit condition due to misuse of legal drugs is also unacceptable. At our discretion, we may require Associates who violate this policy to successfully complete a drug abuse assistance or rehabilitation program as a condition of continued employment.

WE RESPECT ASSOCIATE PRIVACY

We are committed to protecting Associates' confidential, personal information as defined by applicable law. Access to confidential, personal information and records is limited to AAM Associates whose function and responsibilities include the handling of such personal data, and who have a business need for that information.

WE PROMOTE THE SAFE USE OF TECHNOLOGY

We discourage the use of any phone or other handheld electronic device or any other object if it will distract you from driving, operating equipment or otherwise acting in a safe and responsible manner.

WE VALUE AND PROTECT OUR IDEAS

Innovation is a differentiator in our industry. We will win new business when we have products that our competitors cannot offer due to intellectual property that we have developed and protected with patents, copyrights and trademarks where appropriate and available. To protect our intellectual property, never disclose it to anyone outside of AAM unless you have prior, written approval and it is covered by a non-disclosure agreement. Even within AAM, disclosure should be limited to those in

a need-to-know position based on their job duties. This can be difficult to remember when working collaboratively with an Associate, customer or supplier. Keep in mind that the person who first thinks of the idea does not always have the rights to the idea. Many times, the first person to make a formal application to procure a patent obtains the rights to the idea. Any new ideas about products, processes or systems need first to be disclosed internally as part of our innovation development process, and the company will decide if the idea has commercial value. Keep accurate records about when and where any novel ideas were created to support any future application for patent rights.

Trademarks are distinctive symbols, words or phrases, colors or shapes that identify a company's products in the marketplace. For example, AAM's distinctive company logo represents who we are and the quality of our products and services. Consistent and careful usage of AAM's trademarks is critical. Permission to use them is given only to authorized individuals, and it must be done in accordance with established protocols. Examples of correct trademark usage can be seen on POWERhouse, AAM's intranet portal under Logo and Brand Guidelines.





WE RESPECT THE INTELLECTUAL PROPERTY RIGHTS OF OTHERS

Intellectual property includes trademarks, copyrights, patents and trade secrets. Trade secrets can include proprietary information and know-how. We will not use the intellectual property of another without the right to do so. If a customer or other party entrusts us with their intellectual property, we will comply with all contractual commitments and restrictions regarding its use. We do not attempt to obtain the confidential intellectual property of another for inappropriate use.

WE TAKE INDUSTRIAL ESPIONAGE SERIOUSLY

Industrial espionage can take many forms. At its most basic, it is the theft of our valuable information by someone working for the benefit of oneself or a third party, including a competing company. Examples include unauthorized computer access or infiltrating our workforce. We all need to be aware that industrial espionage is real, and we need to be watchful and protective of AAM. We are prohibited from using the unauthorized, confidential information of any third party.

BUSINESS ETHICS LINE

At AAM, quality begins with integrity. It applies to each and every one of us, and everything that we do. Our ethical code maintains that our integrity must never be compromised.

Help us maintain a safe and ethical workplace. AAM Associates should immediately report any of the following concerns:

- Bribery, fraud, theft or any illegal or unethical activity
- Violations of AAM's Code of Conduct or other AAM Policies
- False financial reporting
- Behavior which causes a hostile work environment
- Product integrity or safety concerns



Q & A

If I make a report by calling the Ethics Line, can I remain anonymous?

Most countries encourage anonymous reporting; therefore, our systems allow for anonymous reporting, where permitted. Regardless of anonymity rules, all calls to the Ethics Line are confidential. Trained, non-AAM personnel are available 24 hours a day, seven days a week. Calls to this line may be made without fear of retaliation. Additional contact information may be found on page 22.

To report any of these concerns, you are encouraged to talk to your immediate supervisor or Human Resources representative. For those who may be uncomfortable reporting through established internal channels, reports can be made by calling 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. Most countries allow for anonymous reporting; therefore, our systems allow for anonymous reporting, where permitted.



WE EXPECT ETHICAL BEHAVIOR FROM OUR SUPPLIERS

AAM's suppliers are essential partners in our success. The quality of our supplier relationships affects the quality of our customer relationships. Supplier relationships must be honest and fair. Accordingly, we select suppliers, subcontractors and vendors on the basis of quality, technical excellence, price, delivery, service, maintenance of adequate sources of supply and sustainability performance. We also expect our suppliers to comply with laws and AAM standards relating to labor, environment, health and safety, intellectual property rights, anti-corruption and other matters. Consistent with our values and this Code of Business Conduct, we have adopted a Supplier Requirements Manual to explain how our Supplier Code of Conduct specifically relates to those who perform services for and on behalf of AAM. We consider the Supplier Code of Conduct and the Supplier Requirements Manual in all sourcing processes and expect all suppliers to adhere to the requirements of both.

WE USE SOCIAL MEDIA RESPONSIBLY

We have the ability to connect with everyone everywhere throughout the world. We can communicate and share ideas with the touch of a button. We should always ensure that our participation in online social networking shows professional judgment, responsibility and consideration for others. Do not let it interfere with your productivity. Before posting anything online, consider if you would find it acceptable if the information were published in a major newspaper. Never imply that you have the authority to speak for AAM. And never disclose company confidential information in social media.

SPEAKING ON BEHALF OF AAM

We all have an obligation to protect and enhance AAM's reputation in our decision-making and conduct, and certain Associates have specific responsibilities connected with our corporate reputation.

You should refer all inquiries from the media, financial analysts or other outside parties to our Corporate Communications Department. No statements or representations regarding AAM should be made unless you have been specifically authorized to do so.





CLOSING THOUGHTS

Thank you for taking the time to read and understand AAM's Code of Business Conduct. When you face difficult decisions in your work, use the Code and the company's policies and procedures to guide you. The failure to comply with the Code, company policies and applicable laws can have severe consequences for the company and for you. Your continued commitment to integrity allows AAM to deliver the quality, innovation and excellence that our customers and stakeholders expect.

The Ethics web addresses are:

For Associates in Europe: <https://aameu.alertline.com>

For Associates outside of Europe: <https://aam.alertline.com>

Please contact the HR Department and/or our Legal Department should you have questions or need clarification about the Code of Business Conduct.

HR Department: aamcorphr@aam.com

Legal Department: legal.department@aam.com

ETHICS LINE CONTACTS

ASIA

CHINA	Dial 400-120-5061
INDIA	Step 1 Dial 000-117 Step 2 Dial 877-846-8912
JAPAN	Dial 0120502157
SOUTH KOREA	Step 1 Dial (Dacom) 00-309-11, (Korea Telecom) 00-729-11, (ON SE) 00-369-11, (U.S. Military Bases Dacom) 550-2872, (U.S. Military bases Korea Telecom) 550-4663 Step 2 Dial 877-846-8912
THAILAND	Step 1 Dial 1-800-0001-33 Step 2 Dial 877-846-8912

EUROPE

CZECH REPUBLIC	Step 1 Dial 00-800-222-55288 Step 2 Dial 877-846-8912
FRANCE	Step 1 Dial (FT) 0-800-99-0011 or (TD) 0805-701-288 or (Paris) 0-800-99-0111 or 0-800-99-1011, 0-800-99-1111, or 0-800-99-1211 Step 2 Dial 877-846-8912
GERMANY	Step 1 Dial 0-800-225-5288 Step 2 Dial 877-846-8912
POLAND	Step 1 Dial 0-0-800-111-1111 Step 2 Dial 877-846-8912
ROMANIA	Dial 0800-890-484
SPAIN	Step 1 Dial 900-99-0011 Step 2 Dial 877-846-8912
SWEDEN	Step 1 Dial 020-799-111 Step 2 Dial 877-846-8912
UNITED KINGDOM	Step 1 Dial (British Telecom) 0-800-89-0011 Step 2 Dial 877-846-8912

NORTH AMERICA

MEXICO	Dial 001-877-563-6599
UNITED STATES	Dial 877-846-8912

SOUTH AMERICA

BRAZIL	Step 1 Dial (Cellular) 0800-888-8288 or 0-800-890-0288 Step 2 Dial 877-846-8912
--------	--