

# Code of Conduct and Ethics Policy on Anti-Retaliation

ETHICS & LEGAL COMPLIANCE | ISSUED: June 1, 2014 – REVISED: April 3, 2024

Magna is committed to supporting a culture in which legal and ethical concerns may be raised without fear of retaliation. Magna provides multiple channels for its employees and other stakeholders to report such concerns, and prohibits retaliation against employees and other stakeholders who, honestly and in good faith, raise such concerns.

This policy applies to Magna International Inc. and all of its operating Groups, Divisions, joint ventures and other operations globally (collectively, “Magna”). This policy also applies to all persons who have a relationship with Magna or who act on Magna’s behalf, including employees, independent contractors, officers, directors, suppliers, consultants, and agents.

## INTRODUCTION

It is important that legal and ethical concerns be identified and resolved at the earliest possible opportunity. Magna therefore supports a work environment in which our employees and other stakeholders may report legal and ethical concerns without fear of retaliation (which includes being penalized, discharged, demoted, suspended, threatened, or harassed). Magna does not tolerate retaliation against those who report legal and ethical concerns honestly and in good faith.

## STANDARDS

Magna encourages its employees and other stakeholders to report any credible concerns regarding legal and ethical issues. The prompt identification of such issues gives Magna the best opportunity to be proactive, confirm facts while they are “fresh”, and minimize any potential impact by addressing and mitigating concerns.

Magna will not tolerate retaliation (or any threat of retaliation) against anyone who raises a legal or ethical concern honestly and in good faith (a “Reporter”), or against any person who assists the Reporter or is related to the Reporter. Efforts to discourage or prevent anyone from raising such concerns, or any act of retaliation against a person for raising such concerns will not be tolerated and will be treated as a serious matter and sanctioned with disciplinary action up to and including termination of employment or other business relationship with Magna. Retaliation may also be prohibited by local law and may be punishable as a criminal offense.

This Policy applies to all legal and ethical concerns raised or reports made (anonymously or not), including those communicated anonymously via the Magna Hotline, to a supervisor or manager, or to a member of the Human Resources Department, Legal Counsel, the Ethics & Legal Compliance Department, Internal Audit, or other appropriate methods (the “Reporting Channels”). This Policy also applies to concerns raised or reports made externally to a regulatory agency.

## EXAMPLES OF RETALIATION

Retaliation can take many forms and can include subtle action. Suspected instances of retaliation should be reported (see section on “Reporting Concerns”, below), including any of the examples listed below. Examples of retaliation may include:

- Reduction, addition or change of duties or hours
- Verbal abuse or conduct intended to embarrass or humiliate an employee
- Physical abuse or threats
- Termination, demotion, or threats to terminate or demote
- Denial of a promotion, increase in wages, assignment, transfer, or overtime opportunities
- Other actions adverse to Magna’s Employee’s Charter or Magna’s Operational Principles

## PERSONNEL DECISIONS AND COOPERATION

Nothing in this Policy should be interpreted as preventing Magna from making personnel decisions based on legitimate business reasons that are not retaliatory (for example, a personnel decision based on breach of contract).

Legal and ethical issues and investigations are often complex with many different facets. It is important that all employees and other stakeholders contacted with respect to such issues and investigations fully cooperate so that Magna can obtain the information needed to respond to these matters promptly and appropriately.

## REPORTING CONCERNS INTERNALLY<sup>1</sup>

Concerns about retaliation or other legal or ethical concerns reported internally via one of the Reporting Channels will be reviewed in a timely manner.

At Magna, we expect our managers and supervisors to maintain an Open Door process. Supervisors and managers at Magna must ensure that they are approachable, take legal and ethical concerns seriously, and are familiar with the process for referring such concerns for handling by Legal, Ethics & Legal Compliance, Human Resources, or Internal Audit, as appropriate. It is important that Magna employees and other stakeholders understand that their concerns will be addressed. It is also important that such concerns be raised, reviewed, and referred for handling promptly. After a concern is first raised, the opportunity to be proactive and promptly address the matter can disappear rapidly.

Employees and other stakeholders should also be aware that Magna’s reporting systems must be respected and not abused for any reason. Persons who are found to have filed reports dishonestly or with inappropriate intentions (for example, to punish or harass a fellow employee) will be sanctioned with disciplinary action up to and including termination of employment or other business relationship with Magna.

## FOR FURTHER INFORMATION:

For further information or advice, please contact your Group or Regional Legal Counsel, a Regional Compliance Officer or Magna’s Vice-President, Ethics and Chief Compliance Officer.

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<sup>1</sup> This section applies only to reports made internally within Magna. You are encouraged to report concerns internally via one of the Reporting Channels discussed above. However, in some countries, violations can be reported externally through a government or regulatory agency’s whistle-blowing mechanism. Nothing in this policy stops you from using a regulator’s whistle-blowing mechanism where it is permitted by law in your home country.