# Linamar Corporation Code of Conduct

### Human Rights

Linamar expects all employees to be treated with dignity and respect, and that their human rights and privacy will be respected. This applies to all employees regardless of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, record of offences (pardoned), marital status, family status or disability. Linamar does not tolerate harassment of, or retaliation against, any person in the workplace as outlined in the Company Workplace Harassment Policy included in the employee handbook.

Linamar is committed to conducting business in compliance with applicable laws governing the jurisdictions in which we operate.

#### **Relations with Suppliers**

Employees are not permitted to receive or solicit personal benefits from suppliers, dealers, customers, competitors or other third parties that relate to their employment at Linamar.

All unsolicited gifts not meeting the above criteria must be shared fairly with other employees as applicable (i.e. door prizes at employee meetings / functions).

#### **Personal Interest**

In general, employees must disclose personal and / or business interests that may appear to conflict with Linamar's interests or that may influence, or may appear to influence an individual's judgment or actions in performing duties as a Linamar employee.

## Disclosure of Information – Confidential and Otherwise

The disclosure of confidential information regarding Linamar or its products that could harm the Company's interests, if disclosed in an untimely or unauthorized manner is prohibited.

Confidential information is to be held in strict confidence during and after the term of an individual's employment.

#### **Use of Company Property**

Employees have a responsibility to protect Linamar property against loss, theft, abuse, unauthorized use, access or disposal. "Linamar property" refers to assets and other resources provided by Linamar for use by its employees in the course of their employment whether tangible, intangible or electronic form (internet, phone, etc).

#### **Conflict of Interest**

Due to the demands and competitive nature of its business, Linamar has a special concern with regard to a potential conflict of interest that arises mostly through additional employment ("moonlighting"). While Linamar recognizes an employee's right to engage in other activities outside of his / her job at Linamar, it is expected that an employee will devote his / her full attention to carrying out their job responsibilities during their scheduled hours of work.

An employee should discuss all possible conflicts of interest with Human Resources.



Linda Hasenfratz Chief Executive Officer



Jim Jarrell President and Chief Operation Officer



