WORKING TOGETHER & WINNING TOGETHER...as ONE LEAR

Lear Corporation
Code of Business Conduct and Ethics
# Lear Corporation Code of Business Conduct and Ethics

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A Message from Ray Scott

At Lear, we have a long-standing commitment to conduct our business with integrity and in compliance with all applicable laws and regulations. A commitment to integrity is critical to how we conduct business and maintain our outstanding reputation in the communities in which we do business. We all need to understand our responsibilities and ensure we are meeting them.

I ask each of you to join me in making a commitment to comply with our Code of Business Conduct and Ethics and to always demonstrate the highest standards of integrity and ethical conduct in all business activities. These standards are clearly explained in Lear Corporation’s Code of Business Conduct and Ethics.

Your responsibilities under the Code include:
- Understand the standards contained in the Code
- Comply with all standards contained in the Code
- Notify the Company if you believe a violation of the law or standards has occurred

It is my hope that the Code will reinforce the importance of compliance and ethics issues and provide guidance to help make better ethical decisions each and every day. Strict compliance with the Code is required by all employees. Those who violate the standards of the Code will be subject to disciplinary action up to and including dismissal.

Sincerely,
Ray Scott
President and CEO
Company Overview

Lear was founded in 1917 in Detroit as American Metal Products, a manufacturer of seating assemblies and other components for the automotive and aircraft industries. Lear completed an initial public offering in 1994 and developed into a global supplier through organic growth and a series of acquisitions.

Lear is a leading Tier 1 supplier of two critical systems to the global automotive industry – Seating and Electrical Power Management Systems. We supply our products to virtually every major automaker in the world, and Lear content can be found on more than 300 vehicle nameplates worldwide.

The Lear team is driven to succeed by an unrelenting focus on serving our customers and maintaining excellence in all of our operations globally.
Vision and Values

Making every drive better™

At Lear, we are driven by the possibilities that we see, but we are even more excited about our vision to take those possibilities to the next level: to make every product, every experience, and every drive better. This vision statement describes our purpose, serves as an operational map to the future, and reminds each of us what we're working towards.

Our values, found below, are the underpinnings of our company culture. They describe how we operate, how we expect every employee to conduct business, and how we treat one another.

**Be Inclusive**

**Be Inventive**

**Get Results the Right Way**

To achieve these values – and our overall vision – we will:

• Treat all individuals with dignity and respect
• Conduct our business ethically
• Continually strive for excellence
• Provide our employees, our most important resource, with an environment that:
  • Allows individuals to reach their full potential through education and career opportunities,
  • Encourages active participation, and
  • Is safe and clean
• Continually focus on our customers' needs and expectations
• Treat our suppliers with respect and encourage long-term relationships
• Be good corporate citizens, value the environment and actively participate in our community
• Balance resources to maximize shareholders' return on investment
Introduction to Our Code

WHY DO WE HAVE A CODE?
Lear’s Code of Business Conduct and Ethics (the “Code”) is the foundation of our commitment to act with integrity and in compliance with the laws and regulations that apply to our worldwide operations. It is designed to assist you in recognizing and dealing with ethical issues and guide you to the right course of action.

While the Code sets forth general guidelines of business practices and procedures, it does not purport to capture every law or policy that applies to each of us. We are responsible for knowing the laws and regulations of the jurisdictions in which we operate and for understanding the basic principles of the Code and conducting ourselves accordingly.

WHO MUST FOLLOW OUR CODE?
All employees, officers, directors or agents of Lear Corporation (“Lear”), or its subsidiaries and/or controlled affiliates, (individually, a “Company” and collectively “Companies”) and any other person or entity acting on behalf of the Companies (collectively referred to as “employees” in this Code), must know and comply with all of the Company policies and legal requirements as it relates to your job. As a global business, we are subject to the laws and regulations of all the countries in which we operate, and each of us has a responsibility to know and follow the local laws that apply. In cases where local laws differ from our Code, you are encouraged to ask for guidance from Corporate Compliance or the Legal Department.

WHAT YOU SHOULD DO IF YOU KNOW OR SUSPECT A VIOLATION OF OUR CODE?
All Employees have an obligation to report any potential or suspected violation of the Code. Please refer to Lear’s Complaint Reporting Policy for guidance on how to make a report.

Lear does not tolerate retaliation against any Employee who reports a complaint in good faith. Any Employee who retaliates against someone who has reported a Complaint in good faith, or made a statement in good faith in a complaint investigation process, is subject to disciplinary action up to and including termination of employment. Should you or any Employee feel you have experienced retaliation, please refer to the Company’s Anti-Retaliation Policy for guidance.

EMPLOYEE RESPONSIBILITY
All employees have a responsibility to:

• Conduct business fairly and honestly
• Report any violations or potential violations of the Code without fear of retaliation
• Prevent compliance violations and protect Lear’s reputation by acting in an ethical manner
• Comply with all laws, regulations and policies applicable under the Code and the locations where we operate
Compliance with Laws and Regulations

As an international company with relationships in many countries around the world, Lear is committed to maintaining high standards of business conduct in all regions in which Lear operates. We expect all Employees to conduct our business in accordance with applicable laws, rules and regulations and in an ethical manner. Obeying the law, both in letter and in spirit, is the foundation on which our ethical standards are built. You must respect and obey the laws of the cities, states and countries in which the Companies operate. Although you are not expected to know the details of all applicable laws, it is important to know enough to determine when to seek advice from your supervisor, Human Resource representative or other appropriate department. All transactions between Lear and any of its subsidiaries, or between subsidiaries, must meet all applicable legal requirements. Violations of these laws can result in substantial fines, imprisonment and severe restrictions on the Company’s ability to do business.

If a law conflicts with a policy in this Code, you must comply with the law; however, if a local custom or practice conflicts with this Code, you must comply with this Code. If you have any questions about potential conflicts, please seek assistance from your supervisor or other appropriate Lear personnel. Any questions regarding applicable legal requirements should be referred to the Legal Department.

The U.S. Foreign Corrupt Practices Act (FCPA) prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business. Lear strictly prohibits the making of illegal payments to government officials. The Act applies to all United States organizations, public or private, regardless of where they operate, and any entity, including a foreign person or firm, found in violation of the FCPA in the United States. Any entity may be held liable under the FCPA for the improper activities of its foreign subsidiaries and controlled affiliates if the entity authorized or participated in the illegal conduct.

In addition, governments in regions in which the Companies operate have a number of additional laws and regulations regarding business gratuities to United States government personnel. The promise, offer or delivery to an official or employee of the United States government of a gift, favor or other gratuity in violation of these rules would not only violate Lear policy but may also be a criminal offense. Many state and local governments, as well as foreign governments, have similar rules.

The United Kingdom Bribery Act (UK Bribery Act) prohibits anything of value being paid to any person, not just foreign government officials, to induce them to act improperly. Facilitating payments are prohibited under this Act. “Facilitating payments” are defined as payments made to a government official to facilitate approval of some type of business transaction or activity. The UK Bribery Act applies to UK citizens, residents and companies established under UK law. In addition, non-UK companies can be held liable for a failure to prevent bribery if they do business in the UK.
Reporting Concerns

Integrity is at the core of Lear’s identity and reputation, and we are all responsible for performing with integrity in everything we do. We are also responsible for raising concerns about risks to the Company — ideally, before these risks become actual problems.

As part of Lear’s ongoing commitment to conduct business with integrity and compliance with all applicable laws and regulations, Lear implemented a Compliance and Ethics Line to allow for anonymous reporting. This toll-free, local phone number allows any Employee to call 24 hours a day, any day of the week, and speak with a third party in his or her local language. The purpose of the Compliance and Ethics line is to solicit Compliance and Ethics concerns related to potential violations of our Code of Business Conduct and Ethics and/or potential violations of applicable laws and regulations. We encourage you to review and familiarize yourself with the Complaint Reporting Policy and immediately report a concern if you suspect a violation.

At Lear, many options exist for reporting compliance issues. While we hope that Employees feel comfortable discussing any matter with his or her manager(s), there may be times when Employees prefer to use another alternative for addressing Compliance and Ethics issues. In these cases, an Employee may use one of the following to report his or her concern:

| Compliance and Ethics Line | Reports can be made anonymously, toll-free, in your local language |
| Online Lear Complaint Web Form | Reports can be made anonymously, online, in your local language |
| Mailing | details to the Chief Compliance Officer at Lear Corporation, 21557 Telegraph Rd, Southfield, MI 48033 |
| Email | Lear Compliance at Compliance@lear.com |
| Calling | Lear’s Chief Compliance Officer or General Counsel at 248-447-1500 |

Anti-Retaliation

No one who reports a Compliance and Ethics issue in good faith shall suffer harassment, retaliation or adverse employment consequence as a result of reporting the issue. This includes any attempt to prevent an employee from reporting a concern or participating in an investigation.

Lear will not tolerate retaliation against anyone who in good faith raises a concern, reports misconduct or participates in an investigation.

You are required to strictly adhere to the Company’s Anti-Retaliation Policy to encourage:

- The reporting of any suspected illegal or unethical behavior
- The full cooperation and participation in the investigation of any reported concern
- Full compliance with the Code and all applicable laws and regulations
Conflict of Interest

All Employees are expected to avoid engaging in activities that conflict with, or have the appearance of conflicting with, the best interests of the Company and its shareholders. A conflict situation can arise when an employee takes actions or has interests that may make it difficult for the individual to perform work for the Company objectively and effectively.

Examples of potential conflicts of interest include:

- An Employee, or immediate family member, which includes your spouse (even if he or she does not live with you); parents and stepparents; children and stepchildren; siblings; mothers and fathers-in-law; sons and daughters-in-law; and brothers and sisters-in-law and any other person (other than tenants or employees) sharing your household, receives improper personal benefits as a result of such individual's position in or relationship to the Company
- Loans to an Employee and/or his or her immediate family members by a supplier or customer of the Company
- An Employee works simultaneously as an employee of a competitor, customer or supplier of the Company
- An Employee works for a competitor as a consultant or board member (or in an equivalent position)
- An Employee attempts to influence the selection of a particular vendor or supplier where a family member has a financial interest in such vendor or supplier

Conflicts of interest are not always apparent. You should consult with your supervisor, local Human Resource representative, Corporate Compliance or the Legal Department if there is any question about a potential conflict. Prompt and full disclosure is always the appropriate first step towards identifying and resolving any potential conflict of interest problem. If you become aware of an actual or potential conflict of interest, you should bring it to the attention of your supervisor and Corporate Compliance or the Legal Department.

QUESTIONS & ANSWERS

Q: My spouse works in the Sales department of one of Lear’s suppliers. Do I need to report this to my supervisor?

A: Yes, if you are in a position that would influence the business Lear directs to this supplier. In most cases no additional action is required by the employee or the Company to avoid the appearance of a conflict.
Gifts and Entertainment

Gifts and entertainment in a business environment may sometimes be appropriate to promote good working relationships. However, you cannot give or accept gifts, credits, payments, services, excessive entertainment or anything else of value from an actual or potential competitor, supplier or customer unless such gift is in compliance with Lear’s Global Gifts and Entertainment Policy.

If you have any questions about a gift given or received, you are encouraged to refer to the Global Gifts and Entertainment Policy which describes, in detail, Lear’s guidelines and procedures on the giving, accepting and reporting of gifts and entertainment. Further, gifts given or accepted and entertainment accepted should be logged in the Gifts and Entertainment Log.

The key provisions of this Policy are:

- Cash gifts are prohibited
- Gifts cannot exceed USD $50 or a comparable value in your local currency, per person, per occasion
- The appropriateness of giving or receiving entertainment must be approved in advance by your divisional or functional Leadership
- Under no circumstances should any gift or entertainment given or received violate this Code or applicable laws and regulations
- All Gifts and Entertainment to any government official must be pre-approved by the Legal Department

While the Global Gifts and Entertainment Policy is intended to provide guidance on the giving, accepting and reporting of gifts and entertainment, it cannot specifically address all possible situations. Always consider the context, nature and intent of the gift or entertainment when determining what is appropriate, reasonable and justified.
Political Contributions

No Employee may make any political contribution of any kind in the name of the Company or by utilizing Lear funds, assets, services or facilities. Furthermore, you cannot require, nor should you request, a supplier or vendor of Lear to make a political contribution of any kind as a condition of doing business with the Company. As an Employee, you are free to make a personal political contribution or engage in personal political activities so long as such contributions or activities are lawful, do not interfere with your work responsibilities or give the appearance of a conflict of interest.

Corporate Opportunities

No Employee may use Company assets, property, information, or position for improper personal gain, including the gain of family members or friends. We all owe a duty to the Company to advance the Company’s legitimate interests whenever the opportunity to do so arises.

QUESTIONS & ANSWERS

Q: I am aware of a business opportunity that the Company did not pursue, would I be permitted to pursue this opportunity for myself?

A: No, this would not be permitted, as this was an opportunity that you became aware of in the course of your employment through the use of company property, information or position.
Insider Trading

Insider trading, insider dealing and stock tipping are criminal offenses in most countries where the Company does business. Insider trading or dealing means personally buying or selling securities of any company while in possession of material, non-public information about the company. Stock tipping means disclosing inside information about a company to a family member or friend, to enable the person to buy or sell securities of the company on the basis of such information.

If you become aware of material information about Lear or any other company which has been available to the public for less than two (2) full business days (the timing of which may vary by jurisdiction), you are prohibited by law as well as by Company policy from (a) using that information for securities trading purposes or for any other purpose except for use in the regular conduct of Lear’s business, (b) directly or indirectly disclosing such information to any other persons (including family members or friends) so that they may use that information for securities trading purposes or for any other purpose, or (c) recommending or suggesting that anyone else buy, sell or retain securities of Lear or any other company.

It is difficult to describe exhaustively what constitutes “material” information but you should assume that any information, positive or negative, which might be of significance or important to an investor in determining whether to purchase, sell or hold a security would be material. Information may be significant for this purpose even if it would not alone determine the investor’s decision. You should consult with the Legal Department should you have questions. We emphasize that the following list is merely illustrative.

Examples of Material Information may include:
- Company earnings
- Significant gains or losses
- Potential business acquisition, merger or disposition
- Internal financial information
- The win or loss of a major contract
- New product innovations

Q: I am aware of a deal that Lear will soon be announcing. I tell my friend about it and she buys stock based on this information. Is this considered insider trading?

A: Yes, the rules on “inside” information apply if you buy or sell stock or if you provide information to someone who buys or sells stock. This would be a violation of federal securities laws and both of you could be charged.

Each Employee of Lear is expected to comply with applicable securities laws. Ignorance of the law is not a defense.
Competition and Antitrust

Competition and Antitrust laws protect free enterprise and encourage fair and honest competition. At Lear, we seek competitive advantages through superior performance, never through unethical or illegal practices. Stealing or illegally appropriating proprietary information or inducing disclosures by past or present employees of other companies is prohibited. If you improperly obtain proprietary information from competitors, suppliers or other third parties, you should treat that information as confidential and not use it for improper business purposes. In addition, you should promptly report the situation to the Legal Department.

You are expected to comply with applicable domestic and international antitrust and competition laws. Engaging in, conspiring to or agreeing to do any of the following actions may be prohibited:

- **Price Fixing** - communicating with competitor(s) regarding prices, terms or conditions of sale, output or production
- **Bid Rigging** - agreeing with competitor(s) regarding bids to be submitted
- **Group Boycott** - agreeing with competitor(s) not to deal with vendors or distributors, other competitors or customers
- **Territory or Customer Allocation** - agreeing with competitor(s) to split territories or customers
- **Bribes or Kickbacks** - offering to pay bribes or kickbacks in an attempt to do any of the above

The above list is not intended to be exhaustive but, rather, an illustration of certain types of conduct that constitute illegal antitrust behavior.

QUESTIONS & ANSWERS

Q: What if I meet up with a competitor at a conference and we discuss what we believe would be a fair market price for a part we both supply. Neither one of us put anything in writing, would this be a Competition concern?

A: Yes, it would be a concern and you should immediately share your discussion with the legal department. “Agreeing” includes stated or implied, formal or informal, oral or written understandings.
Exporting and Prohibited Transactions

Any activity that involves exporting commodities or transmitting technical data or software to another country may require a valid export license. An “export” is defined as any method of conveying products or data to foreign individuals or companies, verbally or in writing, including with respect to sales, training and consulting and product promotion. Regardless of the country in which you are working, the United States Export Control Regulations apply to the following:

• Direct exports from the United States
• Re-exports of certain United States-origin commodities and technical data from countries outside the United States to third countries
• United States-origin parts and components used in the manufacture of a non-United States end-product for export or re-export
• Non-United States produced direct products that result from United States-origin technical data

A valid license may be needed even if a product is freely available in the United States or if technical data or software is not proprietary.

Various countries worldwide, as well as the European Union, maintain strict embargoes prohibiting, and lesser sanctions limiting, commercial transactions with specified countries, business entities, organizations and individuals. There are various embargo laws that place restrictions on trading with certain countries. It is your responsibility to ensure that we are not violating any of these laws or restrictions.

In the European Union these regulations and their application to foreign subsidiaries vary depending on the entity involved and the type of transaction. Their application is not limited to high technology trade but can extend to all types of transactions with listed countries, entities and individuals.

If you become aware of possible violations of applicable export control or embargo laws or have a concern regarding a particular country, individual or organization with which the Company is conducting business, you should seek advice from the Legal Department.
Confidential and Proprietary Information

During your employment with Lear, you may obtain confidential and/or proprietary information about the Company, its customers or suppliers.

Confidential information includes, without limitation, all non-public information such as:

- Financial Results
- Prospects
- Agreements
- Commodity price forecasts
- Potential corporate transactions
- Commercial terms and conditions

Proprietary information, which includes know-how and other intellectual property, business, sales, marketing and service plans, engineering and manufacturing ideas and practices, designs, databases, records, salary and other compensation and benefit information, as well as any unpublished financial data and reports, must be protected from unauthorized use or disclosure. Unauthorized use or disclosure of Lear’s proprietary information may be illegal and could result in the imposition of civil or criminal penalties.

It is the responsibility of every Employee during and subsequent to their employment period to protect and not disclose confidential information except when disclosure is authorized by the Company or legally required. You should not discuss internal Company matters or developments with anyone outside of the Company except as required in the performance of your regular Company duties or under applicable laws. Employees are encouraged to review the Company’s Regulation FD Disclosure Policy for more details regarding the protection of the Company’s information.

This prohibition applies specifically (but not exclusively) to inquiries about the Company which may be made by:

- The media
- Investors
- Potential investors
- Financial analysts

We must always respect and protect the information of our customers, suppliers and other Employees with the same level of care that the Company take to ensure the confidentiality of its own proprietary information.

Failure to follow these procedures could result in severe penalties to both the Employee involved and Lear. Unless you are expressly authorized to make a comment, all inquiries of this nature should be referred to our Investor Relations and Communications Department at Lear Corporation, 21557 Telegraph Road, Southfield, Michigan, 48033 or by telephone at (248) 447-1500.

Q: I am working with one of the Company’s commercial business partners and they would like us to share some of our new designs as they relate to our upcoming products. Is it ok for me to provide them with this information?

A: No, never disclose any proprietary information without the approval of management and a written confidentiality agreement.
Protection and Proper Use of Company Assets

You have an obligation to protect the Company’s assets and ensure their efficient use. Company assets should be used for legitimate business purposes although reasonable personal use may be permitted. Company assets include both tangible assets, such as office equipment, telephone and copy machines and intangible assets, such as intellectual property, trademarks, patents and trade secrets.

Employees are provided with computers, electronic resources and other equipment to do their jobs. Lear’s electronic and computing resources are Lear’s property and should primarily be used for Company purposes. Equipment such as computers and other electronic media must not be used for unlawful purposes or for accessing or distributing pornographic or illegal materials or other materials that might create a hostile work environment for others.

Accordingly, any suspected incident of fraud, theft, waste or misuse of the Company’s assets should be immediately reported as described in Lear’s Complaint Reporting Policy.
Information Technology Compliance and Security

General
- Engaging in activity that might be harmful to Lear assets or resources is prohibited.
- Ethical and legal use of Lear-provided internet access is required.
- Do not use public internet email services (e.g., Gmail, Yahoo, etc.) for sensitive Lear communications.
- The use of Lear email systems to transmit any message or attachment whose content violates any Lear policy, local, state or country laws or regulations is prohibited.
- Do not use email as a replacement for file transfer utilities.
- File transfers must take into consideration the 'Confidential and Proprietary Information' section of the Code of Business Conduct and Ethics.
- Critical, important, or sensitive data files must be stored using Corporate IT approved services.

Computing Device Security (mobile phone, laptop, desktop, storage, etc.)
- Computing devices must be secured to prevent loss of the equipment and the sensitive information contained within.
- Users must lock their computing device display or logout when leaving it unattended.

User Credentials
- Users will be held accountable for actions performed under the user ID/account assigned to them.
- Using another person’s name, password, files, data or otherwise misrepresenting personal identity is prohibited.
- User passwords must be kept confidential.
- Passwords must be changed immediately when directed to do so by a security administrator or if it is suspected that the password has been compromised.

Software Management
- Software installed on Lear assets must be properly approved as communicated in the Global Software List.
- Compliance with copyright & software licensing laws is required.
- Personally-owned software shall not be installed on company-owned computers.

Virus Protection/Patches
- Users must not bypass or disable information security measures.
- Users must restart their computer at least one time per month to ensure that security patches are installed.
- Computing devices remotely connected to the Lear network must operate with up-to-date anti-virus and patches.

Monitoring
- To the extent permitted by local, state or country laws and regulations, communications and activities on Lear-owned systems, equipment and devices can be monitored.

REPORTING and INFORMATION
Report questionable computer behavior or the loss of Company devices to:
Lear Global Service Desk
+1 248 447 1008

Visit the Computer User Guidelines (for additional information regarding IT Compliance & Security)
Accurate Business and Financial Records

Accurate business and financial records are critical to meeting our financial, legal and business obligations. The Company’s financial books, records, accounts and financial statements must be timely maintained in reasonable detail and must completely and accurately reflect the Company’s assets, liabilities and transactions, conforming to applicable legal requirements, financial policies and procedures of the Company’s internal controls systems and generally accepted accounting principles. These business and financial records not only include financial statements and accounts but also other records such as time reports, expense reports and claim forms. All of us, not just Lear’s accounting and finance personnel, are responsible for ensuring accurate and complete business and financial records. No transaction may be carried out in a manner such that the substance of the transaction is obscured or recorded improperly.

We have a responsibility to maintain the accuracy of the Company’s records. False or misleading information should never be provided to any department. If an Employee has any concerns with accounting or auditing matters, such as inaccurate, false or misleading information, the Employee should promptly report them according to the Company’s Complaint Reporting Policy.

Examples of inaccuracies include:

- Exaggeration of financial transactions
- Guesswork
- Improper characterizations of people, events and companies

This prohibition applies to, but is not limited to, e-mail, electronic media, internal memoranda, formal reports as well as business letters. E-mail systems and information technology systems provided by Lear should be used only to advance the Company’s legitimate business purposes.

Records should always be retained or destroyed according to the Company’s Record Management Policy. Under no circumstance should records be destroyed that relate to an existing dispute or investigation, unless directed by the Legal Department.
Environmental, Health and Safety

Lear is committed to complying with all applicable environmental legal requirements and protecting the environment. Employees are expected to comply with all applicable environmental legal requirements and report any incidents or conditions that might result in a violation of law or Company policy. Employees are also encouraged to support environmental programs in communities where we do business.

The Company strives to provide each Employee with a safe and healthful work environment. Each Employee has responsibility for maintaining a safe and healthy workplace for all Employees by following health and safety rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions as stated in the Company’s Environmental, Health and Safety Policy.

Violence or threatening behavior is not permitted under any circumstances in the workplace. Employees should report to work in condition to perform their duties and must be free from the influence of illegal drugs and alcohol. The use of illegal drugs or the misuse of alcohol or legally prescribed drugs in the workplace will not be tolerated.

In addition, Employees are required to adhere to all other health and safety policies including the prohibition of weapons on any of the Company’s premises. Employees can find copies of the Company’s health and safety policies on Lear’s Intranet or can obtain a copy from the local Human Resources representative.

Sustainability

Sustainability is widely defined as “meeting the needs of the present without compromising the ability of future generations to meet their own needs.” At Lear, this means acknowledging that our decisions about what we consume, produce and waste has environmental and social impacts on today’s society, as well as on future generations. Lear’s sustainability initiative centers around finding better and smarter ways of doing things, while ensuring the health and vitality of our communities.
Diversity, Equal Opportunity and Respect

At Lear our objective is to create and maintain an environment that fosters collaboration, interaction, tolerance and respect. We believe the best way to deliver the highest quality products and services is to cultivate a strong, diverse team made up of the best possible employees. We value our diverse experiences, backgrounds, ethnicities, cultural orientation and beliefs and promote respectful and mutually beneficial relationships with customers, suppliers, employees and others.

The Company has adopted Global Labor Standards which prohibits the Company from using any type of forced labor or child labor or engaging in abusive or corrupt business practices. In addition, the Company’s Global Purchasing Terms and Conditions prohibit all of its suppliers and their subcontractors from using any type of forced labor or child labor or engaging in abusive or corrupt business practices for all regions in which Lear has operations.

It is the Company’s policy to not interfere with its Employees’ rights to freedom of association. Further, the Company’s posture with respect to labor relations is that Employees have the right to choose (or not) to affiliate with legally-sanctioned organizations without unlawful interference. Where trade unions are present, it is the Company's policy to deal with them fairly and conduct negotiations in a purposeful and non-adversarial manner.

We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any discrimination or harassment of any kind as stated in the Company’s Harassment Free Workplace Policy.

EXAMPLES OF DISCRIMINATION OR HARASSMENT

- Derogatory comments based on race, gender or ethnicity
- Unwelcome sexual advances
- Unwanted physical contact
- Visual displays of derogatory or sexually-oriented pictures or gestures
- Intimidating or demeaning comments/jokes
Waivers of the Code

A waiver of compliance with this Code for executive officers or directors of the Company may be made only by the Company’s Board of Directors or a Board committee acting on behalf of the Board and will be promptly disclosed to the extent required by law and the listing requirements of the New York Stock Exchange. A waiver of this Code for all other Employees may be made only by the Company’s Legal Department.

Compliance Program Monitoring

The Company monitors and enforces the Code and other policies affecting workplace human rights through a compliance program that includes oversight by a Compliance Committee that reports directly to the Company’s Audit Committee of the Board of Directors. The Company also regularly assesses the effectiveness of its compliance programs.
Your Pledge to Do the Right Thing

Lear’s Code represents a commitment to doing what is right. When you work at or represent Lear you agree to uphold this commitment, understand the standards and guidelines that apply to your job and always follow them. Employees who fail to follow these standards, or who fail to abide with applicable laws, rules and regulations in all regions in which Lear operates, put themselves and Lear at risk.

If you have questions about the laws that apply to your activities, contact your supervisor, your local Human Resources member, legal department or Corporate Compliance.

Effective October 5, 2020