

# Code of Conduct and Ethics Policy on Careful Communication

ETHICS & LEGAL COMPLIANCE | ISSUED: May 1, 2014 – REVISED: December 13, 2021

This policy is intended to help employees and other persons who act on Magna's behalf, including officers, directors, consultants and agents, understand the importance of being careful and professional in all communications. Doing so will help to protect you and Magna from potential negative consequences of poor communications.

This policy applies to Magna International Inc. and all of its operating Groups, Divisions, joint ventures and other operations globally (collectively, "Magna").

## INTRODUCTION

At Magna, we encourage our employees to be professional and clear in all communications and to carefully consider the best way to communicate. Depending on complexity, urgency and sensitivity, different matters will require different ways to communicate, such as in person meetings, as well as telephone, electronic, or virtual communications on different platforms. Each type of communication may be suitable for certain purposes. You should take the time to consider what type best fits the situation.

When you communicate in writing, ensure that the communication is appropriate for the issue and audience. When creating a written communication in any format, think through the topic and anticipate how the words could be interpreted (from a reputational standpoint, in legal proceedings, or otherwise). Use care, be professional, and avoid exaggeration or inappropriate speculation

## STANDARDS OF COMMUNICATION

When you send out a written communication, make sure you:

- Know and verify your audience. Check the recipients of the communication – review email addresses carefully and be mindful of using the "Reply All" feature. Understand the role of each recipient of the message, and don't send any more information (including attachments) than necessary. Keep internal messages within Magna.
- Be professional in all your communications. Ensure that the content and tone of the message are appropriate. Provide all necessary context and consider what the reaction might be if your communication were disclosed in a newspaper or on the Internet.
- Exercise extreme caution when communicating with competitors. For more information on this topic, please refer to Magna's Policy on Antitrust & Competition.
- Respect privacy, confidentiality and legal privilege (where applicable). A legally privileged communication is one between you and an in-house or external lawyer that could relate to litigation or legal advice.

## HELPFUL TIPS

### BE CAUTIOUS OF...

- Any communication that includes competitively sensitive information or that may be interpreted as an attempt to coordinate with competitors in a way that lessens competition, such as communications about pricing, bids, allocating markets or customers, or other topics that might violate Magna's Policy on Antitrust & Competition.
- Providing opinions outside your area of knowledge or expertise – do not speculate or assume! Clearly state information of which you have first-hand knowledge. Involve others to address areas outside your area of knowledge or expertise.
- Legal Issues - if you are uncertain whether the topic you are communicating about raises legal issues, involve

your Group, Regional and/or Corporate Legal Counsel, and mark your communications with them as “privileged and confidential”.

- Communications made via social media - Employees and other persons who act on Magna’s behalf are expected to refrain from disparaging Magna or disclosing any confidential information - this duty extends to social media. Communications made via social media should not be considered private, regardless of the user’s settings. For more detailed information, please refer to Magna’s Global Email, Internet and Social Media Policy.

## NEVER...

- Overpromise - be factual.
- Send messages when upset; rather, save a draft of the message for a period of time and then review it before sending. Consider obtaining a second opinion.
- Discuss other stakeholders in a negative manner - be professional.
- Send or forward any communications that are discriminatory or harassing in nature. If you receive such a communication, seek assistance from your Supervisor or Manager, Human Resources Department, Group, Regional or Corporate Legal Counsel, Internal Audit or a member of the Ethics & Legal Compliance Department. Please refer to Magna’s Harassment and Discrimination Policies for more information.

## COMPANY INFORMATION

Remember that almost any form of communication pertaining to Magna or your work may be considered company information (regardless of whether it is in paper, electronic, audio, or other format). Company information is critical to Magna’s business – it may be subject to review internally and externally (including by internal and external auditors, government agencies or investigators, and lawyers reviewing evidence in lawsuits and other legal proceedings).

Assume that there are no “off-the-record” conversations or communications and that anything which is deleted can be recovered.

By communicating carefully, you help to protect not only Magna’s reputation but your own as well.

## CORPORATE DISCLOSURE

Except as required in the performance of their duties, Magna employees should not discuss company matters which constitute “material non-public information” with any person (including friends, relatives and other Magna employees who do not need to know the information). In addition, Magna employees are not authorized to discuss company matters with the media, industry professionals or Magna’s shareholders unless they are “authorized spokespersons”. For more detailed information, please refer to Magna’s Corporate Disclosure Policy and Magna’s Media Policy.

## DATA PRIVACY AND PROTECTION

Keep in mind that communication often includes personal information which must be protected by Magna. Disclose personal information only to the amount necessary for the purpose and only to authorized personnel. Comply with Magna’s security protocols to reduce risk of any data security incidents from happening. For more guidance, please refer to Magna’s Data Privacy Policy and related procedures.

## FOR FURTHER INFORMATION

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

---

Issued:	May 1, 2014
Revised:	December 13, 2021
Next Review:	Q4 2024
Issued By:	Ethics & Legal Compliance
Approved By:	Chief Compliance Officer, on behalf of Magna Compliance Council