

# Code of Conduct and Ethics Policy on Sanctions & Trade Embargoes

ETHICS & LEGAL COMPLIANCE | ISSUED: April 1, 2017 – REVISED: April 14, 2025

Magna is committed to ensuring that it complies with the laws of all jurisdictions in which it does business, including economic sanctions laws and regulations. This Policy applies to all employees of Magna International Inc., and its operating Groups, Divisions, joint ventures and other operations globally (collectively, “Magna”). This Policy also applies to all persons who act on Magna's behalf, including employees, officers, directors, consultants and agents.

- You must comply with all applicable laws and regulations (“**Sanction Laws**”), including Sanction Laws that place restrictions on engaging in business with:
  - countries and/or regions of countries that are subject to comprehensive sanctions imposed by countries in which Magna operates (collectively, “**Sanctioned Countries**”); and
  - persons, companies or entities, including representatives and agents thereof, that are domiciled in Sanctioned Countries or are listed on national or international trade control and/or sanction lists (collectively, “**Sanctioned Persons**”).

## WHAT ARE SANCTIONS?

Sanctions (sometimes referred to as trade embargoes) are measures implemented by governments or international organizations (such as the United Nations) that restrict or outright prohibit business activities in or with certain countries (Sanctioned Countries), sectors, or persons (Sanctioned Persons). They are often intended to pressure governments of the Sanctioned Countries or Sanctioned Persons to change policies or practices considered by the sanctioning government to be harmful to international peace, security, or human rights.

## WHAT DO SANCTION LAWS PROHIBIT?

Sanction Laws restrict or prohibit different business activities, depending on the Sanctioned Country and Sanctioned Person involved. Sanction Laws often place restrictions on the provision or movement of goods, services, or funds. Sanction Laws may, but do not necessarily, restrict or prohibit the:

- Sale or purchase of goods, services, or technical information to or from anyone in a Sanctioned Country;
- Sale or purchase of goods, services, or technical information to or from a Sanctioned Person wherever that person may be located;
- Transfer of funds to or through any Sanctioned Country or Sanctioned Person, as well as receipt of funds from a Sanctioned Person (e.g. a sanctioned bank); or
- Sale of any goods, services, or technical information to a permitted person in a permitted country, if the seller knows that the goods, services, or technical information are intended for a Sanctioned Country or to a Sanctioned Person.

## HOW DOES A COUNTRY OR PERSON BECOME A SANCTIONED COUNTRY OR SANCTIONED PERSON?

Typically, a country, individual or company faces sanctions or embargoes because it is alleged to engage activities such as terrorism, human rights violations, unlawful exports, nuclear proliferation, and other criminal actions. Certain countries and regions where Magna operates (i.e. Canada, the United States and the European Union) prepare and publish lists of Sanctioned Countries and Sanctioned Persons. For example:

Canada: [https://www.international.gc.ca/world-monde/international\\_relations-relations\\_internationales/sanctions/consolidated-consolide.aspx?lang=eng](https://www.international.gc.ca/world-monde/international_relations-relations_internationales/sanctions/consolidated-consolide.aspx?lang=eng)

United States: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx>

European Union: <https://www.sanctionsmap.eu/#/main>

United Nations: <https://www.un.org/securitycouncil/content/un-sc-consolidated-list#composition%20list>

## POLICY

Magna will not enter into business transactions with or involving any Sanctioned Country or Sanctioned Person. If you become aware of an existing or possible business transaction with or involving any Sanctioned Country or Sanctioned Person, promptly contact a Group, Regional or Corporate lawyer. You may also contact your supervisor, a Regional Compliance Officer, or report your concern through the Magna Hotline.

## SANCTIONED COUNTRIES

You must comply with the Sanction Laws that are applicable in any country where you conduct business on Magna's behalf and, to the extent required by applicable Sanction Laws, with the laws of the country of your shareholding entity. In addition, Magna's policy is to generally comply with the Sanction Laws of the United States and Canada in all of its global operations, unless such compliance is not permitted under local law.

Please note that Sanction Laws are complex, vary by country, and change frequently. If you have questions about the application of Sanction Laws to any Magna business activity, please consult with a Group, Regional or Magna Corporate lawyer for advice.

## VIOLATIONS

Magna has no tolerance for compliance violations. Any violation will be treated as a serious matter and will be sanctioned with disciplinary action up to and including termination of employment.

If you are aware of or suspect that anyone is in violation of Magna's Code of Conduct and Ethics or this policy, you should report your concern by informing a Group, Regional, or Corporate lawyer. You may also contact (i) your manager, (ii) a Regional Compliance Officer, (iii) our Ethics & Chief Compliance Officer or (iv) the Magna Hotline.

Magna is also committed to supporting a culture in which concerns about potential violations may be raised without fear of retaliation. For that reason, Magna's [Policy on Anti-Retaliation](#) prohibits retaliation against anyone who raises a concern honestly and in good faith.

## FOR FURTHER INFORMATION

For further information or advice, please contact a Group, Regional, or Corporate lawyer, a Regional Compliance Officer or our Vice-President, Ethics and Chief Compliance Officer.

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