

Code of Conduct and Ethics Policy on Careful Communication

ETHICS & LEGAL COMPLIANCE | ISSUED: May 1, 2014 – REVISED: December 4, 2024

This policy is intended to help employees and other persons who act on Magna's behalf understand the importance of being careful and professional in all communications. Doing so protects against the 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"). This policy also applies to all persons who act on Magna's behalf, including employees, officers, directors, consultants and agents (collectively, "Magna Persons").

INTRODUCTION

At Magna, we encourage all Magna Persons to be professional and clear in all communications and to carefully consider the most effective method of communication based on factors such as complexity, urgency and sensitivity. For the purposes of this Policy, communication methods include in-person and virtual meetings, phone calls, emails, and other virtual communications on different electronic platforms. Each type of communication may be suitable for certain purposes. Please 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. Take the time to think through the topic and anticipate how the words could be interpreted (from a reputational standpoint, in legal proceedings, or otherwise). Be professional, use discretion and avoid exaggeration or inappropriate speculation.

WRITTEN COMMUNICATION

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

- Know and verify the intended audience. Double-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 communications. Ensure the content and tone of the message are appropriate. Consider what the reaction might be if communications were disclosed externally, including if messages were taken out of context.
- Exercise extreme caution when communicating with competitors. Do not discuss pricing, bids, market or customer allocation, or other topics that violate Magna's Policy on Antitrust & Competition. Refer to Magna's [Policy on Antitrust & Competition](#) for more information.
- Respect privacy, confidentiality, and legal privilege (or other immunity from disclosure) when applicable. Although it varies from jurisdiction to jurisdiction, a legally privileged communication is, generally, one between you and an in-house or external lawyer that could relate to potential or ongoing litigation or to requesting or receiving legal advice. For more information on what constitutes Confidential Information, please refer to Magna's [Confidential Information Policy](#).
- Use appropriate communication platforms. Only engage in electronic business communications over company email accounts. Do not engage in substantive business communications over personal email accounts, text messaging, SMS or messaging apps (such as WhatsApp, Viber, LINE or equivalents), social media accounts (such as Facebook, LinkedIn, or equivalents), or any ephemeral communications platforms (such as SnapChat,

Telegram, Messenger, Wickr, or equivalents). For more information, please refer to Magna's Records and Information Governance Policy.

COMPANY INFORMATION

Remember that almost any form of communication pertaining to Magna or Magna Person's work is considered company information (regardless of whether it is in paper, electronic, audio, or other format). Company information is critical to Magna's business and 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 anything that is deleted can be recovered.

CORPORATE DISCLOSURE

Except as required in the performance of their duties, Magna Persons should not discuss company matters which constitute "material non-public information" with any person (including friends, relatives and other Magna Persons who do not need to know the information). Additionally, only authorized Magna spokespersons should engage with the media, industry professionals or Magna's shareholders. For more detailed information, please refer to [Magna's Corporate Disclosure Policy](#) and [Magna's Media Policy](#).

DATA PRIVACY AND PROTECTION

Protect personal information shared in communications, disclosing only what is necessary and only to authorized personnel to reduce the risk of data security incidents, as set out in Magna's Data Privacy Policies. For more information, please refer to Magna's [Data Privacy and Protection Policy](#) and related procedures.

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.
- Communications that could raise legal issues. If you are uncertain whether the topic you are communicating about raises legal issues, involve 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, including on 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/Intranet and Social Media Policy](#).

NEVER...

- Overpromise, speculate or exaggerate. Be factual and do not assume!
- Provide opinions outside your area of knowledge or expertise. Clearly state information of which you have first-hand knowledge. Involve others to address areas outside your area of knowledge or expertise.
- 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.
- 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 or Regional Legal Counsel, Internal Audit or a member of the Ethics & Legal Compliance Department.

FOR FURTHER INFORMATION

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

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