



CODE OF BUSINESS CONDUCT





WE ARE AAM. WE ARE DELIVERING POWER.

Dear AAM Associates:

Since 1994, when Richard E. Dauch co-founded our company, AAM has acted on the belief that doing what is right sets the foundation for long-term success. This legacy allowed us to quickly and profitably grow into the worldwide company that we are today and is vital to our continued success.

Delivering Power is what we stand for and what we believe. It is through our cultural values and strategic principles that AAM Delivers Power. Every one of us is accountable for understanding these values and principles, as well as our compliance policies, which together make up our Code of Business Conduct.

This Code is intended to give you guidance, but it is only a starting point. If you are ever uncertain of the right course, talk to your manager, our General Counsel or contact the AAM Business Ethics Line. Our culture is built on teamwork so you should never feel alone when facing an ethical dilemma.

At AAM, Integrity—the Power of Doing What Is Right—is paramount. As many of you have heard me say, I would much prefer that you do the more difficult right than the easier wrong. Doing what is right is not always the easiest choice, nor the most popular, but it is the AAM way, and it is how we Deliver Power.

Please review the contents of our Code and think about how it applies to your work. Please also consider the important role your actions play in upholding AAM's reputation of integrity, quality and excellence.

Sincerely,

A handwritten signature in black ink that reads 'David C. Dauch'.

David C. Dauch
Chairman & Chief Executive Officer





WE ARE AAM. WE ARE DELIVERING POWER.

CULTURAL VALUES

The cultural values of AAM are what we expect each associate to embrace. These values are what drive performance in all that we do at AAM.

STRATEGIC PRINCIPLES

The strategic principles of AAM are the foundation of our business model. These principles build value and collectively position AAM as a global leader.



DELIVERING POWER.

This is what AAM stands for, what we believe. Through these cultural values and strategic principles, AAM Delivers Power.



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INTRODUCTION



In our pursuit of excellence in all that we do, ethics and integrity are integral to our daily work lives. Our hard-earned reputation for excellence can be damaged due to unethical or illegal business conduct. Such conduct destroys trust and incurs legal liability and financial losses. There is no place for such conduct at AAM.

AAM has experienced dramatic global growth. For us to continue as a strong, vibrant and competitive organization, it is important that we all operate in accordance with a consistent set of global standards. The AAM Code of Business Conduct (the “Code”) provides a framework for decision making and conduct in key areas. It applies to all associates and agents of AAM, as well as to our Board of Directors. The Code is a business document that you should consult regularly to help guide you as needed.

Failure to follow the Code is a serious matter and may result in action being taken that could affect your continued employment consistent with local laws. Our Delivering Power® cultural values begin with Integrity – the power of doing what is right. We must all embrace this value in order to succeed as an organization. No exceptions.

LEADERS AND MANAGERS MUST MODEL EXPECTED BEHAVIOR AND DEMONSTRATE ETHICAL LEADERSHIP

- Lead by example. Act with integrity at all times.
- Understand AAM’s policies and procedures pertinent to your responsibilities.
- Act within the law at all times. If you are not sure, ask. In particular, members of the Legal team are always available to help you understand the law as it applies to any question you may have.
- Encourage reporting of all violations of the Code and assist fully and timely in any investigations as requested.

RAISE CONCERNS

If you suspect that there has been a violation of AAM’s policies, the Code or the law, report it by contacting your manager, our General Counsel or your Human Resources representative. For those who may be uncomfortable reporting through established internal channels, reports can be made by calling AAM’s toll-free Business Ethics Line and speaking to trained, non-AAM personnel who are available 24 hours a day, seven days a week, or via our web-based reporting

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INTRODUCTION

system. Most countries encourage anonymous reporting, therefore our systems allow for anonymous reporting where permitted. Contact information for the toll-free number and web-based reporting system may be found on page 20. Unless it is part of your assigned job function, do not conduct your own investigation. All investigations are confidential and conducted on a “need to know” basis. We do not allow retaliation or adverse action against any associate who reports a suspected violation in good faith or cooperates in an investigation. Retaliation itself is a violation of the Code, and AAM will respond accordingly. In some locations outside of the United States, anonymous reporting may not be allowed or reporting of suspected violations may be limited to certain areas of concern. If there are limitations that exist in your location, our Ethics Line complies with the requirements of local laws. If you have any doubts about local requirements, or making a report in general, please contact our General Counsel.

Q & A

Q: If I make a report by calling the Ethics Line, can I remain anonymous?

A: Most countries encourage anonymous reporting, therefore our systems allow for anonymous reporting where permitted. Regardless of anonymity rules, all calls to the Ethics Line are confidential. Trained, non-AAM personnel are available 24 hours a day, seven days a week. Calls to this line may be made without fear of retaliation.

Additional contact information may be found on page 20.

INVESTIGATIONS

When you come forward, you make a difference. All reports are followed up promptly, professionally and diligently with the highest degree of confidentiality possible. Every reported concern is investigated, and each investigation is reviewed by a committee made up of senior managers from internal audit, legal, compliance and human resources. Corrective action is taken as appropriate. Reports should only be made in good faith. This means that you believe the information provided is truthful and you are not intentionally making any false or misleading statements. Like any other misconduct, intentionally filing a report in bad faith may result in disciplinary action.



AMENDMENTS TO THE CODE

The Code does not create any individual rights or privileges, nor is it intended to create any rights greater or lesser than the law applicable or any contract to any associate at AAM. AAM retains the right to amend the Code at any time without prior notice.

WE SUCCEED AS AN ORGANIZATION WHEN WE FOLLOW THE CODE

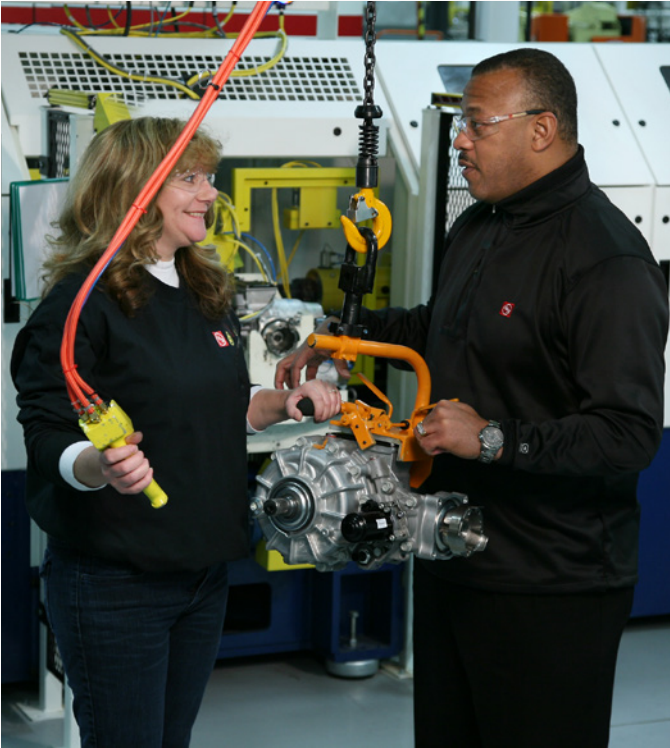
The Code protects and promotes all of us acting as one in the pursuit of the success of AAM. We must all embrace the principles of the Code if we are to succeed as an organization.

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WE CONDUCT OUR BUSINESS WITH INTEGRITY

SECTION 1



WE ARE COMMITTED TO HONEST AND ETHICAL BUSINESS PRACTICES

We win business by competing lawfully in the marketplace. Our reputation as an honest competitor is very important. Our commitment to fairness includes respecting the rights of our competitors, as well as the expectation that our competitors will respect our rights. We compete aggressively based on the merits of our products and services. We do not make misleading statements about our competitors' products or services, but rather focus our efforts on the benefits our customers receive by partnering with AAM.

Competition laws regulate our relationships with our customers as well as our competitors. As a general rule, we limit our contact with competitors. We do not discuss our pricing, bids, terms of sale or territories with any competitor. Collusion among competitors is illegal in almost all countries and violations carry serious penalties such as fines and imprisonment. Suppliers can also be competitors. Use extra caution in such situations. The laws related to fair competition are many, complicated and vary by region. Questions about compliance should be directed to our General Counsel.

We never solicit employees of competitors or other companies for the purpose of gaining access to their proprietary information. Associates joining AAM from other companies are expected to keep proprietary information of their prior employers confidential. Similarly, we expect AAM associates to keep our proprietary information confidential should they leave AAM.

We support human rights around the world, and will comply with all applicable laws regarding the treatment of our associates and other stakeholders. We will not tolerate child or forced labor anywhere and we will not do business with any company that does. We respect associates' freedom of association and all other workplace rights.

AAM's suppliers are essential partners in our success. The quality of our supplier relationships affects the quality of our customer relationships. Supplier relationships must be honest and fair. Accordingly, we select suppliers, subcontractors and vendors on the basis of quality, technical excellence, price, delivery, service and maintenance of adequate sources of supply. We also expect our suppliers to comply with laws and AAM standards relating to labor, environment, health and safety, intellectual property rights, anti-corruption and other matters. Consistent with our values and this Code of Business Conduct, we have adopted a Supplier Requirements Manual to explain how the Code of Business Conduct specifically relates to those who perform services for and on behalf of AAM. We consider the Code of Business Conduct and the Supplier Requirements Manual in all sourcing processes, and expect all suppliers to adhere to the requirements of both.

WE RESPECT THE INTELLECTUAL PROPERTY RIGHTS OF OTHERS

Intellectual property includes trademarks, copyrights, patents and trade secrets. Trade secrets can include proprietary information and know-how. We will not use the intellectual property of another without the right to do so. If a customer or other party entrusts us with their intellectual property, we will comply with all contractual commitments and restrictions regarding its use. We do not attempt to obtain the confidential intellectual property of another for inappropriate use.

WE TAKE INDUSTRIAL ESPIONAGE SERIOUSLY

Industrial espionage can take many forms. At its most basic, it is the theft of our valuable information by someone working for the benefit of oneself or a third party including a competing company. Examples include unauthorized computer access or infiltrating our workforce. We all need to be aware that industrial espionage is real and we need to be watchful and protective of AAM. We are prohibited from using the unauthorized, confidential information of any third party.

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WE CONDUCT OUR BUSINESS WITH INTEGRITY

WE PREVENT BRIBERY

We never offer or make bribes to secure business. Anything of value can be considered a bribe if it is intended or could be perceived to influence a business or governmental decision or action. Bribes are not just money. Trips, jobs, favors and similar valuable considerations can be bribes.

We are committed to complying with anti-corruption laws that prohibit bribes, kickbacks or other corrupt actions to obtain or retain business or obtain improper advantage. Many countries in which we do business have specific laws against bribery. The United States Foreign Corrupt Practices Act, UK Bribery Act, Brazilian Clean Companies Act and Indian Prevention of Corruption Act are prominent examples of such laws. All AAM associates, as well as our Board of Directors, are expected to comply with applicable anti-corruption laws.

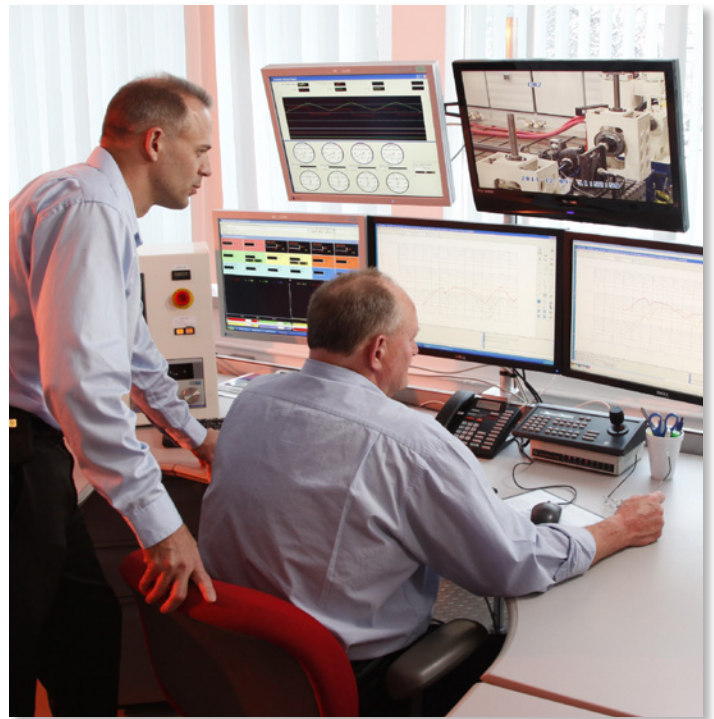
Our Supplier Requirements Manual mandates that third parties are expected to follow our Code of Business Conduct when acting on our behalf. Suppliers, agents and consultants hired to act on AAM's behalf are prohibited from directly or indirectly receiving or offering any form of bribe, kickback or other corrupt payment, to or from AAM associates, public officials or other private or public actors, with the intention to obtain or retain business or any other improper advantage.

WE CONDUCT REASONABLE HOSPITALITY

Hospitality in the form of gifts and entertainment are common in the business setting. We use moderation and discretion when giving or accepting them. Items of nominal value, such as cab fare, reasonable meals and entertainment expenses, or company promotional items are generally acceptable. The larger the gift, however, the more likely it will be viewed as given with an improper purpose.

We may not give or accept any gift if it is intended, or could be perceived, to influence business or governmental decisions or actions. For example, payment of travel costs associated with training or facility inspections are generally viewed as appropriate, even where modest entertainment is provided. However, including the travel costs of accompanying family members or friends, or payment for lavish meals or sightseeing trips would not be appropriate.

We also take it upon ourselves to understand any limitations placed on our customers or others with whom we interact to be sure we abide by their policies as well.



For more detailed guidance on our rules regarding hospitality, please review the Gifts & Entertainment attachment to our Conflict of Interest Policy.

Q & A

Q: I invite a customer to a sporting event every year in his hometown. This year I thought it would be fun to take him to a different event that is out of town over a weekend. Some travel, lodging and meals would be involved. I know he would appreciate it, and the extended time together would allow us to really build a good relationship. Is this acceptable?

A: No. Such hospitality goes beyond what is deemed "reasonable" under normal business conditions. You should also be aware that such hospitality is against the rules of many of our customers. Not only do we want to follow our own rules, we want to honor the rules on hospitality established by our customers. Know them and abide by them.

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WE CONDUCT OUR BUSINESS WITH INTEGRITY

WE AVOID CONFLICTS OF INTEREST

Sometimes our personal circumstances can inadvertently affect our objectivity in performing our duties and responsibilities to AAM. Even the perception of a conflict could negatively affect you and our company, causing severe reputational harm. You are expected to disclose any potential conflicts to ensure transparency and to determine whether there is an actual conflict. Your disclosure of a potential conflict provides your management with information to clarify potential conflicts and resolve as appropriate.

All salaried associates are required to complete the Conflict of Interest Acknowledgement annually (notification will be sent to you via email). Associates must also advise management whenever there is a change in condition that may indicate a conflict of interest.

Generally a potential conflict falls into one of several categories:

- Financial (e.g. financial interest in a company that contracts with AAM)
- Professional (e.g. hiring a family member as an associate or a supplier)
- Personal (e.g. a personal relationship with a subordinate, or accepting employment or compensation that is inconsistent with AAM's interests)
- Misuse of property (e.g. using AAM property for personal benefit)

For complete information on how to identify and handle a potential conflict, please review the Conflict of Interest Policy.



WE COMPLY WITH EXPORT CONTROLS AND CUSTOMS LAWS

The ability to ship internationally is critical to our success. The United States and other governments impose legal restrictions on exports, re-exports and imports of goods. Accordingly, we comply with all U.S. export control laws as well as applicable laws of countries in which we do business.

Export controls apply not only to the physical shipment of goods, but also to the transfer or release of technical information, software or source code to foreign nationals in the U.S. or abroad. We always obtain export licenses when required by U.S. law or by the laws of countries in which we do business.

The U.S and other governments impose trade sanctions or embargoes on certain countries and regions as a matter of foreign policy. We will not conduct business with any sanctioned or embargoed regions unless the transactions are permissible under the laws of the U.S. and other applicable jurisdictions. Governments also prohibit business transactions with certain restricted parties that have been identified as being involved in terrorist and other illegal activities. We will not conduct business with any restricted parties.

Q & A

Q: I mentioned to a friend of mine who works for a supplier to AAM that my son is just out of college and trying to find a job. My friend told me that her company is hiring and asked for my son's resume. If my son is hired by this supplier, is this a conflict of interest?

A: Maybe. Are you in a position to be able to affect how the supplier is treated within AAM? This is a typical situation where you need to speak up and ask. Do not just assume there is no conflict. If you have any doubts, contact our General Counsel for guidance.

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WE KEEP ACCURATE AND HONEST RECORDS



WE CREATE BUSINESS RECORDS THAT REFLECT THE TRUE NATURE OF TRANSACTIONS AND EVENTS

We create thousands of business records every day. We rely on their accuracy to analyze and report our operations and make sound business decisions. It is also possible that our business records could end up being disclosed through litigation, government investigation or stories in the media.

We never deliberately create a false record, falsify an existing record, or try to disguise what really happened. We also stick to the facts we know. Exaggeration, speculation and legal conclusions should be avoided. If you have concerns regarding legal or financial exposure, it is best to first speak with your supervisor and get legal guidance from the General Counsel's office before you commit your opinions to print.

We also follow lean principles and act in accordance with applicable record retention schedules and policies. If there is a lawsuit or investigation, you may be required to produce documents for a specified period of time, and it is important that you follow any instructions in such an event.

Our business records are used when we file our financial statements, tax returns and other regulatory and statistical reports. We comply with US Generally Accepted Accounting Principles (GAAP) and local accounting rules for our non-US financial reporting requirements. Any associate who supplies information for financial or tax purposes must provide it in a timely manner and certify the accuracy of the information and compliance with AAM policies. Integrity in financial

reporting and public disclosure reinforces our reputation for honesty in the financial community.

We have a system of internal controls designed to monitor the integrity of our business records and, in turn, our financial reporting. These internal controls require associates to:

- Maintain adequate documentation to provide a complete, accurate, timely and auditable record of each transaction.
- Safeguard all physical, financial, informational and other assets.
- Provide timely reviews, forecasts and assessments to management.

Although the Ethics Line can be used to report concerns of many kinds, it is specifically intended to allow for the confidential and anonymous reporting of financial irregularities.

Q & A

Q: A customer asked us to change an invoice to make it look like a sale took place on an earlier date than it actually did. The change is easy to make and it will really help our customer. Can I go ahead and make the change?

A: No, you cannot. Our invoices are business records and should reflect the actual date on which the sale took place. Changing the date on the invoice would create a false and misleading record, and your actions may assist the customer in breaking the law.

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WE PROTECT OUR INFORMATION AND PROPERTY

SECTION 3

WE USE OUR RESOURCES RESPONSIBLY

We must all protect and use our AAM assets responsibly. These assets include, but are not limited to, financial assets, property, equipment, inventory, supplies, information, computers, Internet services, telephones and e-mail system. These assets are provided to us so that we may do our jobs, and they should be used within authorized limits for that purpose. When using company-provided assets off-site, care must be taken to protect such assets from damage or theft. We should use strong passwords and follow all AAM security policies and procedures.

WE VALUE AND PROTECT OUR IDEAS

Innovation is a differentiator in our industry. We will win new business when we have products that our competitors cannot offer due to intellectual property that we have developed and protected with patents, copyrights and trademarks. To protect our intellectual property, never disclose it to anyone outside of AAM unless you have prior written approval and it is covered by a non-disclosure agreement. Even within AAM, disclosure should be limited to those in a need-to-know position based on their job duties. This can be difficult to remember when working collaboratively with an associate, customer or supplier. Keep in mind that the person who first thinks of the idea does not always have the rights to the idea. Many times the first person to make a formal application in terms of procuring a patent obtains the rights to the idea. Any new ideas about products, processes or systems need to first be disclosed internally as part of our innovation development process, and a determination will be made to decide if the idea has commercial value. Keep accurate records about when and where any novel ideas were created to support any future application for patent rights.

Trademarks are distinctive symbols, words or phrases, colors or shapes that identify a company's products in the market place. For example, AAM's distinctive company logo represents who we are and the quality of our products and services. Consistent and careful usage of AAM's trademarks is critical. Permission to use them is given only to authorized individuals, and it must be done in accordance with established protocol. Examples of correct trademark usage can be seen on the AAM Portal under Logo and Brand Guidelines.



WE USE COMPANY-SUPPLIED COMMUNICATIONS ASSETS FOR COMPANY PURPOSES

Our electronic communications systems, including the equipment and all stored data, are the property of AAM. These resources are provided to allow us to perform our jobs efficiently. In order to protect the integrity of AAM's information technology systems and the data contained therein, all messages transmitted through the company's Internet connections and messaging systems are AAM's property and are subject to monitoring by authorized associates. You should have no expectation of privacy in connection with the use of these systems and the information transmitted through such systems or stored therein.

We do not use these systems or equipment to access or create material that is illegal, offensive, threatening or obscene. We use such systems and equipment for business purposes. Any incidental non-business uses must not interfere with work responsibilities or productivity and must not conflict with applicable AAM policies.

AAM reserves the right to delete any information from AAM-owned systems and equipment without advance notice to the extent permitted by law. Associates who utilize the mobile phone stipend program understand that AAM reserves the right to delete information off of associate-owned phones pursuant to the agreement between the associate and the company.

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WE PROTECT OUR INFORMATION AND PROPERTY



WE DO NOT PERMIT INSIDER TRADING

Insider trading can be defined as:

- Trading stock (or encouraging another to do so) while possessing “material non-public information” about AAM;
- Disclosing “material non-public information” about AAM to others in violation of the law;
- Acting in a manner which is likely to manipulate the market price of AAM stock or related financial instruments or which otherwise misleads purchasers or sellers of such instruments.

Insider trading is illegal in most countries. Even if you do not personally benefit from the violation, the penalties can be severe to both you and AAM. “Material non-public information” is information that is not publicly available and that a reasonable investor would likely consider important to know before making an investment decision or would likely have a substantial effect on the price of a company’s securities.

Q & A

Q: What are some examples of “material non-public information” about AAM?

A: Examples of material non-public information about AAM include, but are not limited to, the following type of information:

- Merger, acquisition or divestiture activity
- New product development
- Major litigation
- Sensitive information covered by confidentiality agreement
- Significant gains or losses of business
- Earnings or earnings estimates
- Board or officer changes

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WE VALUE A POSITIVE, HEALTHY WORK ENVIRONMENT

SECTION 4

WE RESPECT EACH OTHER

Our global workforce allows us to compete in a global marketplace. The full value of each associate's contribution can be achieved when we appreciate and recognize the importance of our collective backgrounds, experiences and perspectives. The Delivering Power® cultural value of Teamwork – the power of working together, can be fully achieved only if we respect each other's contributions.

We value a work environment that is free from intimidation or harassment. Harassment can take many forms, such as sexual advances or inappropriate comments, jokes, language or gestures. Harassment may also occur when the behavior of one or more associates creates a hostile or offensive work environment for others. Any form of harassment is unacceptable and must be reported immediately so corrective action can be taken.

Q & A

Q: How can I recognize if someone's behavior is actually a form of intimidation or harassment?

A: Intimidation and harassment can include any behavior that creates an intimidating, hostile or offensive work environment and is based on protected personal characteristics. Examples include, but are not limited to:

- Derogatory comments including gestures or jokes, based on legally protected characteristics
- Sexual advances
- Verbal or physical threats
- Offering employment benefits in exchange for sexual favors
- Actual or threatened retaliation for opposing intimidation or harassment or for reporting violations of the Code or other company policies

WE VALUE EQUAL OPPORTUNITY

We select and place associates based on their qualifications for the work to be performed, considering accommodations as appropriate and needed, without regard to characteristics protected by law. We prohibit unlawful discrimination in full compliance with applicable laws.



WE PREVENT VIOLENCE

Acts or threats of violence are not tolerated. Weapons are prohibited within our facilities, including parking lots and vehicles, or at any AAM-sponsored event.

WE PROMOTE HEALTH AND SAFETY

We are committed to providing a reasonably safe and healthy work environment for our associates and visitors at all AAM facilities. Our health and safety programs are based on the following principles:

- An active commitment to health and safety excellence.
- A business strategy using health and safety to create a competitive advantage.
- Compliance with all applicable laws and regulations and implementing prudent standards where none exist.
- Requiring each associate, contractor and visitor to take reasonable care of their own health and safety as well as that of others and to cooperate with health and safety programs that are in place.
- Striving for continuous improvement in our health and safety programs.

Smoking is not allowed on the premises of any AAM facility.

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WE VALUE A POSITIVE, HEALTHY WORK ENVIRONMENT



WE VALUE PRODUCT INTEGRITY

It is our job, every day, to produce high-quality vehicle components for our customers. Ensuring product integrity is an essential part of AAM's Cultural Values. Our expectation is that you will speak up when becoming aware of a concern regarding AAM's product. Ensuring we have a culture in which associates know they can bring such issues forward is an essential part of our role in putting the highest quality vehicles on the road.

You can bring product integrity concerns to the attention of AAM's Product Integrity Committee for further analysis and investigation. If you feel that your concern is not being addressed through this established process, you may report your concern via our Business Ethics Line.

Reports can be made by calling AAM's toll-free Business Ethics Line and speaking to trained, non-AAM personnel who are available 24 hours a day, seven days a week, or via our web-based reporting system. Both systems allow for anonymous reporting where permitted by local law. Contact information for the toll-free number and web-based reporting system may be found on page 20.

WE DO NOT TOLERATE POSSESSION OR USE OF ALCOHOL, ILLEGAL DRUGS OR CONTROLLED SUBSTANCES

For everyone's safety, using, possessing or being under the influence of alcohol, illegal drugs or controlled substances without a prescription on AAM property or while engaged in any job-related activity is strictly prohibited. Being at work in an unfit condition due to misuse of legal drugs is also unacceptable. At our discretion, we may require associates who violate this policy to successfully complete a drug abuse assistance or rehabilitation program as a condition of continued employment.

WE RESPECT ASSOCIATE PRIVACY

We are committed to protecting associate's confidential, personal information as defined by applicable law. Access to confidential, personal information and records is limited to AAM associates whose function and responsibilities include the handling of such personal data, and who have a business need for that information.

WE PROMOTE THE SAFE USE OF TECHNOLOGY

We discourage the use of any phone or other handheld electronic device or any other object if it will distract you from driving, operating equipment, or otherwise acting in a safe and responsible manner.

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WE FOLLOW THE LAW

SECTION 5



WE COOPERATE RESPONSIBLY WITH LAW ENFORCEMENT AND GOVERNMENT

If any disclosure about AAM is requested by a government or law enforcement officer, you must promptly notify and consult with our General Counsel. It is our policy to deal honestly with government representatives and to comply with reasonable and valid government requests for information and processes. Associates must be truthful in their dealings with the government and must not direct or encourage anyone to give false or misleading information to any government representative. If you believe that AAM records are being altered, destroyed or otherwise handled inconsistently with the applicable record retention policy, you should report this immediately to our General Counsel. If any government official seeks to inspect an AAM facility, you should notify your supervisor or manager immediately.

WE COMPLY WITH ALL APPLICABLE LAWS WHEREVER AAM DOES BUSINESS

We operate businesses in many countries and are subject to the laws of many jurisdictions. Some laws extend beyond the border of a specific country. For example, US laws concerning imports and exports, bribery and trade sanctions apply not only to our US operations, but to our operations around the world. We are each responsible for following all of the laws that apply to our businesses. This obligation extends to our activities with others. At no time will we act in a manner that would assist another party to engage in illegal activity. We cannot take actions which we know, or ought to know, will assist others in violating the law. If at any time you have any concerns whether a certain activity is legal, contact our General Counsel.

Q & A

Q: Who are government officials?

A: Examples of government officials include, but are not limited to:

- Employees of government agencies—for instance, tax and customs inspectors and police officers
- Employees of government-owned or government-controlled companies or public international organizations
- Political parties, officials, candidates and office holders

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WE FOLLOW THE LAW



WE COMPLY WITH INTERNATIONAL BUSINESS REGULATIONS

As our business becomes more global and complex, full compliance with import and export regulations becomes a common issue. Accurate classification, value and country of origin documentation is required for all cross-border transactions.

Many countries maintain trade sanctions restricting with whom we may do business or where we may do business. We should never engage in a cross-border transaction without first having a full understanding of how these trade laws affect us. Even the shipment of test parts, software or data across a border is highly regulated. Depending on the circumstances, an export license may be required before we can:

- Conduct a plant tour with a foreign national present.
- Provide training courses or materials overseas or to foreign nationals visiting your location (for example, a foreign national visiting in the US).
- Send electronic information to a foreign national.
- Present at a meeting with a foreign national present.

From time to time, the U.S., the European Union, and other countries will impose trade embargoes and other trade restrictions against specific countries. We will abide by all such restrictions.

US law also prohibits us from participating in any foreign boycott or embargo that is not approved by the US government. We must report any requests to participate in boycotts or embargoes to the US authorities. Not doing business with a “blacklisted” company is one example. Another is the Arab League boycott of Israel. Any such request must be reported immediately to our General Counsel.

Sales of products or services intended for military purposes receive special attention. If any such transaction is contemplated, prior review is required before any discussions are conducted or actions taken. Please contact our General Counsel for guidance.

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WE VALUE OUR REPUTATION

SECTION 6



WE CAREFULLY MANAGE ALL MEDIA REQUESTS

We all have an obligation to protect and enhance AAM's reputation in our decision making and conduct, and certain associates have specific responsibilities connected with our corporate reputation. You should refer all inquiries from the media, financial analysts or other outside parties to our Corporate Communications Department. No statements or representations regarding AAM should be made unless you have been specifically authorized to do so.

WE USE SOCIAL MEDIA RESPONSIBLY

We have the ability to connect with everyone, everywhere throughout the world. We can communicate and share ideas with the touch of a button. We should always ensure that our use of personal wireless devices and the participation in online social networking show professional judgment, responsibility and consideration for others. Do not let it interfere with your productivity. Before posting content, consider if you would find it acceptable if the information was published in a major newspaper. Never imply that you have the authority to speak for AAM. And never disclose company confidential information in social media.

WE PROVIDE HIGH-QUALITY PRODUCTS AND SERVICES

Our reputation for excellence is in part derived from the high-quality products and services we provide. Our business, reputation and success depend on our commitment to quality and regulatory compliance. We make sure that issues related to quality are addressed timely, and if not, that it is reported to the executive team member responsible for quality and customer satisfaction.



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WE VALUE OUR REPUTATION



WE RESPECT THE POLITICAL PROCESS

Campaign finance laws in the US and other countries restrict the ability of companies like AAM to support political candidates and causes. While our associates may personally support political candidates and causes as they see fit, AAM associates and Board members may not commit AAM to contribute money, services, use of facilities, fundraising sponsorships or support a political candidate or cause without prior written approval, nor must any such support be provided on behalf of AAM.

WE DO WHAT IS RIGHT

This is the essence of the Delivering Power® cultural value of Integrity. Our reputation is only as good as the last experience one has in dealing with us. Everything we do or say can potentially help, or hurt, us all. Maintaining our reputation as an ethical organization requires more than simply doing the minimum that is required by law. It means doing what we know is right, even if those situations are not governed by specific regulations or policies. If at any time you believe that the Code is in conflict with local laws or regulations, follow the binding provisions of the law and inform our General Counsel about such conflict immediately.

**DELIVERING
POWER.**



WE ARE COMMITTED TO BEING A RESPONSIBLE CITIZEN

SECTION 7



WE SUPPORT THE COMMUNITIES WHERE WE LIVE AND WORK

By working together with public and private organizations, we can partner to make a difference in the communities where we live and work. The contribution of our time, talent and resources can assist in making measurable progress against difficult issues. We hold ourselves to high standards and encourage others to do the same.

WE STRIVE TO REDUCE THE ENVIRONMENTAL IMPACT OF OUR OPERATIONS

We go beyond environmental compliance. We help conserve natural resources and act to continuously improve our performance through waste minimization, efficient resource usage and other measures relevant to our business. We make sure that associates have the training and resources to meet these goals.

**DELIVERING
POWER.**



CONTACT INFORMATION

BUSINESS ETHICS LINE

At AAM, quality begins with integrity. It applies to each and every one of us, and everything that we do. Our ethical code maintains that our integrity must never be compromised.

Help us maintain a safe and ethical workplace. AAM associates should immediately report any of the following concerns:

- Bribery, fraud, theft or any illegal or unethical activity
- Violations of AAM's Code of Conduct or other AAM Policies
- False financial reporting
- Behavior which causes a hostile work environment
- Product integrity or safety concerns

To report any of these concerns, you are encouraged to talk to your immediate supervisor or human resources representative. For those who may be uncomfortable reporting through established internal channels, reports can be made by calling AAM's toll-free Business Ethics Line and speaking to trained, non-AAM personnel who are available 24 hours a day, seven days a week, or via our web-based reporting system. Most countries allow for anonymous reporting, therefore our systems allow for anonymous reporting where permitted.

AAM will not tolerate retaliation against associates who act in good faith by reporting suspected illegal acts or unethical behavior. Retaliation is a violation of the AAM Code of Conduct. Individuals who retaliate will be subject to discipline and possible termination.



Toll-free from outside the United States

Asia	
China	Step 1 Dial (Southern) 10-811 or (Northern) 108-888 Step 2 Dial 877-846-8912
India	Step 1 Dial 000-117 Step 2 Dial 877-846-8912
Japan	Dial 0120502157
South Korea	Step 1 Dial (Dacom) 00-309-11, (Korea Telecom) 00-729-11, (ON SE) 00-369-11, (US Military Bases Dacom) 550-2872, (US Military bases Korea Telecom) 550-4663 Step 2 Dial 877-846-8912
Thailand	Step 1 Dial 1-800-0001-33 Step 2 Dial 877-846-8912
Europe	
Czech Republic	Step 1 Dial 00-800-222-55288 Step 2 Dial 877-846-8912
France	Step 1 Dial (FT) 0-800-99-0011 or (TD) 0805-701-288 or (Paris) 0-800-99-0111 or 0-800-99-1011, 0-800-99-1111, or 0-800-99-1211 Step 2 Dial 877-846-8912
Germany	Step 1 Dial 0-800-225-5288 Step 2 Dial 877-846-8912
Poland	Step 1 Dial 0-0-800-111-1111 Step 2 Dial 877-846-8912
Spain	Step 1 Dial 900-99-0011 Step 2 Dial 877-846-8912
Sweden	Step 1 Dial 020-799-111 Step 2 Dial 877-846-8912
United Kingdom	Step 1 Dial (British Telecom) 0-800-89-0011 Step 2 Dial 877-846-8912
North America	
Mexico	Dial 001-877-563-6599
United States	Dial 877-846-8912
South America	
Brazil	Step 1 Dial (Cellular) 0800-888-8288 or 0-800-890-0288 Step 2 Dial 877-846-8912

The Ethics web addresses are:
 For Associates in Europe: <https://aameu.alertline.com> and
 For Associates Outside of Europe: <https://aam.alertline.com>

Please contact the HR Department and/or the General Counsel should you have questions or need clarification about the Code of Business Conduct.

HR Department: aamcorphr@aam.com
 General Counsel: general.counsel@aam.com

