

CONFLICT MINERALS POLICY STATEMENT

The Conflict Minerals Disclosure Rule

The U.S. Securities and Exchange Commission (SEC) rule (the **“Rule”**) under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the **“Dodd-Frank Act”**) requires publicly traded companies subject to Securities Exchange Act of 1934 reporting requirements, to report annually on the use and source of ‘conflict minerals’ in their products. Conflict minerals are defined in the Rule as Gold, as well as, Tin, Tantalum and Tungsten (and their derivatives Cassiterite, Columbite-Tantalite and Wolframite), which originate in the Democratic Republic of Congo or an adjoining country specified in the Rule (collectively the **“Covered Countries”**). The Rule was implemented to increase supply chain transparency with the aim of ending ongoing violent conflict in the Covered Countries that the U.S. Congress determined is being partially financed by revenues generated from the mining and transport of conflict minerals.

Our Commitment

We are committed to taking necessary steps to comply with the Rule and have implemented a global process to meet our obligations, and reporting to the SEC. We support industry-wide efforts to identify the source of conflict minerals and certify mines and smelters as “conflict free”.

Our Objectives and Actions

As required by the Rule, Magna is using the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from High Conflict Areas (the **“OECD Guidance”**), as an international due diligence framework for meeting the requirements of the Rule. Magna is taking a number of actions in accordance with this framework, including:

- Supporting the requirements of the Rule, which requires the annual reporting of our reasonable country of origin inquiry with respect to conflict minerals, and if applicable, supply chain due diligence measures taken;
- Involvement as a member of industry associations in efforts to improve supply chain transparency and compliance with the Rule;

- Involvement as a member of the Responsible Minerals Initiative (RMI) which operates a program to improve, over time, the ability of companies to track and trace conflict minerals in their supply chain back to the smelter and mine of origin; and
- Strengthening our due diligence program and processes to identify the source of the minerals used in our products in accordance with the OECD Guidance.

Our Expectations of Suppliers

Magna is committed to sourcing components and materials from companies that share our values and commitment to human rights, ethics and environmental responsibility. We require our direct suppliers to: (i) support our efforts to comply with the Rule by taking appropriate due diligence measures to determine the origin of minerals used in products supplied to Magna; (ii) increase awareness of the Rule's reporting requirements among their suppliers; and (iii) obtaining information from their suppliers with respect to the origin of minerals used in products ultimately supplied to Magna.

COMMUNICATING WITH MAGNA REGARDING CONFLICT MINERALS

Questions regarding Magna's Conflict Minerals Program can be sent to our dedicated email address: conflictminerals@magna.com. Concerns regarding this Policy Statement or Magna's Conflict Minerals Program can be communicated by phone or online through our confidential and anonymous Hotline by visiting magnahotline.com. Submissions to the Hotline are received and tracked by an independent third-party provider, and will be reported to members of our Conflict Minerals team for review and appropriate action.

This Policy Statement is available on our corporate website for reference by our customers, suppliers and other stakeholders.

Originally Enacted: May 30, 2014

Revised: August 22, 2023

Next Review: May 2025

Owner: Conflict Minerals Working Group

