

MAHLE

Driven by performance



CODE OF ETHICS OF
MAHLE METAL LEVE S.A.
AND ITS SUBSIDIARIES
IN BRAZIL



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Message of the President

This is the Code of Ethics of MAHLE Metal Leve S.A. and its subsidiaries in Brazil. In addition to outline the principles that guide both work and relations at the company, this document also defines the ethical behavior expected from each employee in the exercise of their activities, in order to strengthen the corporate policies and values, as well as our participation in communities in which we operate.

We aim to lead in performance and encourage the creation of competitive advantages, such as innovation, technology, knowledge, operational effectiveness, intelligent marketing, efficient distribution channels, cost rationalization, risk management, healthy working environment and good corporate governance practices.

According to the *Instituto Brasileiro de Governança Corporativa* (Brazilian Institute of Corporate Governance -IBGC), corporate governance concerns the way companies are managed and monitored, in a system that involves the relationships between shareholders, Board of Directors, management and controlling bodies. Good practices in the area increases the value of society, by making the access to capital easier and contributing to the business longevity.

Ethics permeates the whole process. The same happens with the social responsibility, which is part of our culture and is fundamental to the relationship between the company, employees and society. Through continuous actions, MAHLE promotes practices regarding people and the adoption of socially responsible actions, contributing to the improvement of social welfare and community life.

In order to clarify the duties and shared obligations and warn about ethical and legal issues, we have developed this Code of Ethics, which outlines the responsibilities of the company and its employees regarding the several strategic public or stakeholders, the so-called client stakeholders, consumers, shareholders, suppliers, banks, investors, unions, public authorities, distributors, regulatory bodies, media, competing companies, community, professional associations, non-governmental organizations, scientific communities, environmentalists and so on.

MAHLE establishes in this document, objectively and straightforwardly, the company positioning facing matters subject to moral evaluation. Therefore, MAHLE allows employees to be clear about expected behaviors and attitudes when facing controversial situations, herein treated in complete transparency, in order to avoid misunderstandings.

The Code of Ethics is a behavior guideline, a reference text for the decisions made on a daily basis, from the simplest to the most complex ones. Spreading this Code for all employees allows achieving the principles, policies and values of the company, preserving the corporate image and ensuring the continuity of a corporate group that knows how to value the leadership position in the company's target markets and its importance in the society.

This document may not contain all the answers to everyday work situations, due to the relations dynamic. Nevertheless, it contains the behavior guidelines expected of each employee in the conduct of his/her activities, helping them to discern which attitudes need to be taken when facing issues involving ethical aspects.

We expect that this Code of Ethics can be an inspiration to each employee, so they can convert their own conduct as an example to be followed by everyone else.



Claus Hoppen
CEO of MAHLE Metal Leve S.A.

Key Points

- All employees should be treated fairly.
- No one, regardless of hierarchical position, has the right to request an employee to do something or take an action contrary to the laws in force of the country or disrespect MAHLE's values, policies and procedures.
- There is zero tolerance for any kind of harassment
- Employees are assured that their personal information is handled and protected in accordance with applicable laws.
- Suspicious situations involving persons and activities of the company should be reported by employees, which can contact the direct managers or use the communication channels that MAHLE provides for this purpose.

Code of Ethics of MAHLE Metal Leve S.A. and its Subsidiaries in Brazil.

1. Code of Ethics

MAHLE Metal Leve S.A. is aware of its role in the economic development and the communities well being where it operates. Managing business with integrity, according to the law in force and in accordance with the regulations that govern the corporate activities is the moral value rooted in the company and in the other subsidiaries, from the earliest times.

For Grupo MAHLE, the concept of sustainability is related to how the company is integrated in the society. The three sustainable development dimensions - economic development, social development and environmental management - are vital to add value to the business and ensure its continuity. In this respect, there is awareness of the impact generated in the communities where the company has operations and concentrate efforts to promote prosperity and sustainability, considering all the concerned public, including employees, suppliers, customers, community, shareholders, government and business associations.

2. Definition

The Code of Ethics of MAHLE Metal Leve S.A. is the set of rights, duties and corporate

responsibilities towards all stakeholders, reflecting the company's principles, policies and values, as well as environmental management and the set of professional and personal behavior standards involving employees, service providers, consultants and members of the productive chain. These are standards that act as assumptions to enrich the decision-making processes and guide behavior.

3. Scope.

The Code of Ethics covers the relationship among all stakeholders from MAHLE Metal Leve S.A. and its Subsidiaries in Brazil, including management bodies, committees, executive boards, managers, employees and other members of the productive chain.

4. Functions

Guiding the actions of all personnel and basing on moral principles, the Code of Ethics of MAHLE has three basic functions:

4.1. Moral Legitimacy - The Code of Ethics deals with the rights and responsibilities that the company and its stakeholders establish among themselves. The document establishes the conditions and terms that are recognized by common consent, legitimate expectations and ensure equal treatment rights.

The criteria for balancing the expectations becomes the basis for a mutually advantageous agreement and cooperation.

4.2. Preventive Function - The Code of Ethics allows, through the enunciation of abstract and general principles, recognizing opportunistic behavior and clarify the non-abusive but proper exercise of authority, in order to prevent arbitrariness. It also addresses the delegation and decision-making autonomy of each employee of the company and stakeholders.

4.3. Incentive Function - The Code of Ethics generates incentives for the compliance of principles, corporate policies and behavior standards contained herein. The company's reputation and the establishing of mutual beneficial reliable relationships depend on the compliance of it. Managers and leaders of MAHLE Metal Leve S.A. and its subsidiaries are responsible to encourage the open and honest dialogue with employees, play a positive agent role and serve as an example, by showing respect and consideration for everyone.

5. As Parameter for Conflict Resolution

5.1. The adoption of this Code of Ethics is a good opportunity to increase the integration

between the employees and stimulate commitment. It allows the criteria management standardization, giving support to those who are in charge of making decisions.

5.2. The document serves as parameter for the conflicts resolution, supporting the involved parties. On the one hand, the employee finds support in the corporative culture reflected in the dispositions of this Code; on the other hand, the company gives support solving matters involving misconduct of any employee, shareholder, supplier or other stakeholder. There can even be considered the Code of Ethics as an extension of the Work Contract, i.e., an additional "clause" that establishes reciprocal rights and duties.

5.3. MAHLE expects from its employees the ethical behavior described in this Code, which becomes part of work contracts in force and to be established, what will also happen with contracts with suppliers and service providers.

6. Ethical Principles

6.1. Honesty, dignity, respect, loyalty, decency, diligence, efficiency, transparency and awareness are the ethical principles that guide the relationship of MAHLE Metal Leve S.A. and its subsidiaries with the interested public.

6.2. The company performance aims at achieving increasing levels of competitiveness and profitability, without neglecting social responsibility, which results in the valuing of employees as human beings, in the prioritization of issues regarding health, safety and environmental preservation, as well as the contribution of MAHLE with the development of regions it operates.

6.3. The information published internally or externally by MAHLE Metal Leve S.A. and the controlled units should be guided by transparency and truth, in view of the respect relationship between the company and its stakeholders.

6.4. MAHLE believes that the private lives of its employees is a matter of their own interest, unless attitudes may harm the interests of the company and its corporate image.

6.5. Justice, legality, competence and honesty should be the basis for decision making in the company.

6.6. in their management practices, MAHLE also promotes initiatives to strengthen the motivation, satisfaction and commitment of its employees.

6.7. For MAHLE, the errors should be used as a source of learning,

in order to generate opportunities to eliminate its causes and prevent recurrence.

6.8. Based on the company's ethical principles, this Code guides the personal and professional behavior of all employees, regardless of position or function they have. Regulates yet, the relationship between co-workers and relationships with customers, suppliers and other public of contact.

The Code in practice

Situation: The supervisor requests the subordinated to release a product before the laboratory tests conclusion, aware that the request is in discordance with the MAHLE's standard procedure, what action to take?

Behavior: the employee should ask the boss who will explain the standard procedure because, it may have been some changes that it might not be of his/her knowledge. If the sending instruction is in discordance with the standard procedure, the leadership is able to understand and correct the error. If proven to be a diversion, the fact should be reported to a higher level. MAHLE assures to the employee that he/she will not suffer reprisals for his/her actions according to the Code of Ethics.

Situation: An employee takes ownership of the company's supply.

You do not agree with the attitude, you know that goes against the ethical principles of the society and laws of the country and, therefore, goes against the Code of Ethics of MAHLE. What to do?

Behavior: MAHLE does not allow this type of procedure and puts its communication channels available to receive information in order to curb abuses. All proven fact will cause the respective sanctions.

7. Relationship with the Market

7.1. All MAHLE activities and business are founded on ethical principles, since the company believes that this is the basis for establishing lasting relationships with its stakeholders.

7.2. The company applies the best practices of corporate governance, with transparency and equal treatment for its stakeholders.

7.3. MAHLE respects the competitors, following the rules and laws in force.

The Code in practice

Situation: the employee has a friend who works for a competitor and sometimes comments about the MAHLE sales plans and marketing. Is there a problem with that?

Behavior: it is a strategic issue and, when making comments, the employee will be disclosing confidential information, which violates the Code of Ethics.

In addition, it may violate antitrust laws, prohibiting discussion marketing and pricing.

8. Conflict of Interest

8.1. All employees should focus on the interests of MAHLE Metal Leve S.A. and its subsidiaries. There will not be allowed situations which characterize conflict of interests, particularly those of personal or family that may influence certain decision criterion rather than the interests of the company.

8.2. Are considered inconsistent with the principles of business of MAHLE Metal Leve S.A. and its subsidiaries either seeking or accepting, offering or concordance, facilitation or concealment of improper payments or obtaining of benefits or favors to and/or third party, even if only one of the involved commits abuse of trust or executive authority, whether public or private.

8.3. It is forbidden to offer or acceptance of goods or services of a personal nature, as well as from any financial assistance, whatever its nature,

from/to business partners or from/to holding positions in public administration.

8.4. The employee may not offer to business partners or accept from them, meals, gifts, personal services or travel and overnight stays with the purpose of leisure. The only plausible exceptions occur when observing the following situations:

8.4.1. When meals are part of an initiative that legitimate objective of business development and integrate the work agenda. Examples: lunch during seminars and meetings, cocktail receptions or subsequent to a journey of meetings and dinners included in a continuous period of work.

8.4.2. When participating in sporting events, concerts, entertainment activities or social, at the invitation of business partners, always with the presence of a representative of the host at the event, if approved by its Board of Directors. When the promotion is a MAHLE initiative, a representative of the company must also be present, greeting the guest.

8.4.3. Promotional material or gifts worth up to 25% of the federal minimum wage may be offered or accepted, provided it is clear that these gifts

will not come to influence the trial or the actions of employees in the performance of his/her obligations.

8.4.4. It is allowed to participate in technical events (conferences, fairs, symposia and others) at the invitation of business partners, noting the prior approval of the Board of Directors, provided that such participation does not involve airfare and lodging. As a consequence of the definitions above, no cash balance in no circumstances, will be accepted and allowed if not properly registered in accordance with the regulatory procedures for the preparation of financial reports, using the principles of comprehensiveness, used by the accounting department to companies of the Grupo MAHLE.

The Code in practice

Situation: visiting a trade fair, can employees visit the competitor's booth?

Behavior: the visit to the competitor's booth and collection of material for public distribution are free. However, if someone will talk to the booth, visitors must be identified as a contributor to MAHLE, with the responsibility to not provide confidential information about the company.

Situation: are there any restrictions on accepting a second job outside MAHLE?

Behavior: any other employment must not create - or give the impression of creating - conflict of interest with the responsibilities of MAHLE employee. The second job should be kept completely independent, being forbidden to use the name or the MAHLE or information or property of the company in order to implement the second job activities.

Situation: bearing the cost of fuel, the developer can use one of MAHLE's fleet vehicles for the weekend or after working hours to carry items that do not fit in his/her own car?

Behavior: It is forbidden to use the vehicle under the conditions described, since MAHLE only offers its fleet for commercial purposes.

Situation: in a conference, MAHLE's representative makes a presentation and the sponsor of the event, as a sign of appreciation, offers a check or other form of thanks.

Behavior: MAHLE's employees are not allowed to receive gifts in cash or equivalent means as retribution for activities performed on behalf of the company. Without being aggressive and thanking the intention of the act, the professional should decline the offer and politely explain the policy MAHLE these cases.

Situation: a supplier sends a gift at the end of year celebrations for his contact at the company. Can the employee keep the gift?

Behavior: no problem in accepting the gift, provided that the value of the gift does not exceed the limits of MAHLE's policy.

Situation: on the need to release a specific request made to the public organs or government bodies, an employee from MAHLE face a public server that offers ease the process by paying a personal bonus. What the company's guidance in these cases?

Behavior: MAHLE does not condone this practice, and does not tolerate any kind of corruption or bribery from public officials or companies. All payments made by MAHLE should be directly related to products and/or services specified in contracts or statements of costs, with payment being made directly to the Corporations or the Government, never to Individuals related to any of these instances.

9. Confidentiality/Access to Intranet and Internet

9.1. Computing resources, such as internet, intranet, email and management system (SAP),

among others, should be used exclusively for the execution of work activities, not being allowed to use contrary to the purposes for which they were deployed .

9.2. It is clear that MAHLE has the right to perform the monitoring of technology resources being provided to its employees seeking the uses within the law and in accordance with the provisions stipulated in the previous item. It is dispensed the need of prior authorization of the employee, not setting the referred monitoring violation of privacy act.

9.3. The entire security system of access to information is based on passwords that are confidential, personal and non-transferable. Are expressly forbidden the following practices for employees:

- a) disclose to the other employees and third parties under any pretext, the password assigned to him/her;
- b) allow unauthorized access to information and resources under his/her responsibility, and
- c) use the password of another employee, with or without permission.

9.4. The employee undertakes to keep confidential any information of technical,

commercial or industrial property of MAHLE, its customers or suppliers, not disclosing, under any circumstances or by any means, whether verbal, electronic or print .

9.5. The employee is responsible for the safekeeping of the information obtained from MAHLE due to the exercise of their activities, and knowledge of such information does not give you the right to act as spokesperson for the company regarding the disclosure to the market.

9.6. The confidentiality obligations do not end with the termination of employment, and the use and/or disclosure of information in a non-authorized way may result in legal action for damage to MAHLE.

9.7. The maintenance of backups with stored information in computers (desktops, laptops and workstations) is the responsibility of the users themselves. For the business strategic information, the IT area has available, under the employee's own request, storage space in central resources such as servers and storage (server for data storage). In these cases, the area of Information Technology is responsible for the backup process (backups).

9.8. At MAHLE, the installation of software is the sole responsibility of the Information Technology area. Exceptional cases may only take place prior written permission from the area of Technology management information.

9.9. The installation of any computers or network components at MAHLE is the sole and strictly responsibility of the Information Technology area, and cannot be performed by users areas in any case. For questions within this area, the user must request the Help Desk services from his/her unit.

9.10. At MAHLE, the acquisition and installation of software can only occur when the purchase is approved by the Information Technology area and the product is accompanied by its license, legally acquired. It is expressly prohibited the use of illegal software, also known as "software piracy".

9.11. There will not be allowed to use illegal, unethical, unauthorized or harmful equipment and information systems from MAHLE. The ban includes the transmission and the storage of inappropriate material, pornographic, obscene, offensive, and discriminatory and derogatory content in relation to age, race, color, religion national origin, disability or sexual orientation. It

is expressed that such conduct will not be tolerated.

The Code in practice

Situation: the employee is leaving the company. There are restrictions on speaking about MAHLE after leaving the company?

Conduct: the responsibility is the same as when the employee was still working for MAHLE, in other words, he/she cannot address or share confidential information, proprietary and that are relevant and which have not yet been officially disclosed by the company.

Situation: an outsourced consultant needs to use company's computers to carry out his/her work, having access to electronic files with confidential information. Must he sign a confidentiality agreement?

Behavior: contracts with companies or consultants should include confidentiality clauses. The legal department should ensure that all contracts must feature confidentiality clauses.

Situation: the employee received an Email from a friend outside MAHLE containing a "chain letter". Can he use the emails system of the company to pass it on to other friends who certainly would like to receive it?

Behavior: The MAHLE mailing system must be used responsibly and professionally focused. Improper use impairs performance and availability of network computers, which are important resources for the company's business. Thus, MAHLE's e-mail should not be used to start or continue the "chain letter", neither as a vehicle to spread messages that are in discordance with the guidelines for using the system.

10. Political Involvement

MAHLE follows the principle of neutrality regarding to political parties and candidates.

The Code in practice

Situation: the employee is engaged in the campaign of a friend who is running for political office. Is there a problem with that?

Behavior: It is forbidden the use of assets/resources from MAHLE for political support. as a citizen, the individual is free to support the candidate of his/her choice. as an employee, he must be aware of restrictions, aware that the schedule of work, location and the name of MAHLE represent assets/resources of the company.

11. "Money Laundering" Prevention.

11.1. MAHLE and its employees do not engage in any circumstances, in activities involving the hiring or accepting entries for cash or species through any kind of criminal acts.

11.2. In preventive nature and even before establishing commercial ties, the company and its employees must collect general and financial information and from suppliers and business partners in order to meet the respectability and legitimacy of their activities.

11.3. MAHLE has as its principle the application of laws against "money laundering" in any jurisdiction.

12. Integrity of Financial Statements

12.1. All financial transactions must be recorded by MAHLE so it meets the principles and accounting standards and tax laws.

12.2. The employees responsible for the financial information from MAHLE must comply with laws and regulations and internal procedures of the Group, in order to ensure that financial information is complete, consistent and recorded according to the accrual period.

The Code in practice

Situation: someone asks the employee to change the financial information to hide a situation. aware that the attitude is not in accordance with the company policies, what should the professional do?

Behavior: the employee must not, under any circumstances, alter or falsify any register of the company. The thing to do is have the information channel to report the occurred.

13. Corporate Communications and Information

13.1. MAHLE Metal Leve S.A. recognizes the importance of clear and efficient communication in internal and external relations.

13.2. before that, it is necessary that the communication actions are organized according to clear, homogeneous criteria, taking into account both the needs of business and the various product lines as the economic and social role of the company as a whole. The dissemination of information should always be carried out in a fast and coordinated manner.

13.3. employees in charge of disseminating information about the company's departments, product lines, profit centers or

markets of operation, through interviews, speeches, participation in seminars, publications or any other form of presentation, must comply with the specific rules of the company, in line with Grupo MAHLE' provisions. When necessary, they must obtain prior authorization from the communications committee, composed by members from the Board of Directors and corporate areas, including the Legal and Investor Relations.

13.4. The communication with the economic markets, financial and regulatory bodies is managed exclusively by the Investor Relations area, according to the information Disclosure Policy and procedures established by the communication committee.

13.5. The whole communication process from the Investor Relations area with the economic and financial markets, as well as with supervision authorities and vigilance, must be done fast, accurate, complete, correct, clear and understandable, always in accordance with the laws that apply the jurisdictions of operation.

The Code in practice

Situation: If approached by a journalist to give an interview on aspects of the company, which procedure to adopt?

Behavior: the employee must forward the request to the area of Relations with investors, which centralizes the communication actions.

14. Labor Relations

14.1. The relations in the workplace, in all units where the company develops its activities, should be guided by valuing human life, respecting the individual, by moral integrity, transparency and collaboration, always considering the development of all.

14.2. MAHLE proposes to be impartial in providing opportunities, not protectionism. The company respects the free trade union and the right to collective bargaining, meeting the agreements with organizations legitimately representing employees.

14.3. MAHLE does not tolerate the following practices by its employees and other members of the productive chain:

- direct and indirect involvement in situations characterized by child labor or forced labor;
- discriminatory behavior, such as jokes, threats and other undesirable behavior involving issues of race, creed, age, geographic origin, sexual orientation,

disability or possession of sexually transmitted diseases (HIV/AIDS);

- bullying, sexual, offensive, intimidating or humiliating,
- verbal or physical conduct that disturbs the performance of another employee, or to create fear or hostility in the workplace.

14.4. MAHLE observes the commitments made with the Fundação Abrinq in the areas of education, health, civil rights and investments in child and Adolescent.

14.5. MAHLE has signed the National Pact for the Eradication of Slave Labor. In the face of a proven charge of forced or child labor involving suppliers, the company will immediately break the established business relationship.

The Code in practice

Situation: You're embarrassed, because in the workplace you are the butt of jokes and unpleasant comments, creating some unease between you and your co-workers.

Behavior: MAHLE does not condone any form of provocation, nor with hostile work environments in which the employees feel in some way threatened or intimidated.

The employee must have a dialogue with the manager, and a candid conversation, to say how he/she feels. If the employee feels comfortable talking directly, they can use the communication channels available.

Situation: during a meeting, the employee makes a point and receives an offensive response, feeling humiliated. He/she suffers, yet with the reaction of other people present, who amused the confrontation.

Behavior: MAHLE encourages open communication and recognizes the positive side of difference of opinions and healthy debate. However, the company argues that all decision-making processes should be conducted with courtesy and professionalism, respecting the differences of opinions. The employee who did not feel respected in his dissent should seek to establish an honest dialogue with those who caused the discomfort. He/she can also talk to his/her manager directly, or even use the existing communication channels.

Situation: participating in an internal recruitment process, the employee is disappointed by not being chosen, because the place was destined to an external candidate.

Behavior: when the emergence of a vacancy, MAHLE's policy prioritizes the assessment of their internal talent. It does not mean, however, that all vacancies necessarily have to follow this procedure. There are cases that involve specific knowledge and the realization of external recruitment. Any way, if the employee wants to ask questions or express their opinion, may do so through the communication channels specified in the end of this publication.

15. Health, Safety and Environment

15.1. It is MAHLE's principle; to always act with environmental responsibility, and employees must respect the interests of the communities where the company operates.

15.2. The commitment to health, occupational safety and environment is a continuous process. MAHLE provides all employees the tools and the necessary resources to improve performance and perform activities in a healthy work environment.

15.3. Ensure effective management of health, occupational safety and environment represents a decisive factor of success to MAHLE.

15.4. For profit or increase production, MAHLE will not endanger,

under any circumstances, the health or safety of employees. Each business unit has the duty to promote and preserve the safety of the workplace. The rules and procedures established shall be compulsorily followed. It is up to each of the execution of their work in accordance with the rules of health and safety, the employee should immediately report any incidents to the manager and report situations of concern or even disregard for safety standards.

15.5. It is forbidden to use, possess or transfer illegal drugs within MAHLE facilities. It is forbidden to work under the influence of alcohol or illegal drugs, as well as using drugs in the workplace. MAHLE will not allow anyone to work under the influence of drugs that may create unsafe conditions.

15.6. Employees are forbidden to act violently or make threats, being absolutely prohibited the possession or use of any types of weapons in the workplace.

The Code in practice

Situation: The employee notes that a colleague, sometimes, comes to work under the influence of alcohol, and he/she is not sensitive to the warnings of the danger of such behavior. How should the professional act before the

situation as he is concerned with the health and safety of friends and workplace?

Behavior: drunkenness during the workday brings risk for the drinker and for others. MAHLE does not allow the professional activity under the influence of alcohol and drugs and is strongly opposed to this type of conduct. In situations like the one described, the path is to inform the manager so he can take the necessary steps, involving qualified professionals to lead the issue and provide necessary assistance.

Situation: The employee notes that some activities are endangering the safety of persons or the environment, but the problem occurs in other work area and he is afraid to get involved.

In this case, should he report the problem? What is the best channel?

Behavior: safety and environment are issues that concern everyone, and do not allow omission, under penalty of harmful consequences for the community. The employee must share the concern with the manager or in his/her absence, the professional responsible for the areas of safety, health and environment.

Situation: the employee suffers a slight injury in the course of work and the manager says that,

due to the insignificance of the fact, there is no need to report the incident. Corporate standards predict that any injury or incident must be reported.

Behavior: No matter how small, any incident of injury or work accident should be informed to the areas of Workplace Safety and Health at Work. Only then the company is able to ensure the highest standard of safety in all its activities.

16. Obligations and Sanctions

16.1. All employees must:

- Comply with the provisions and policies of this Code of Ethics regarding their specific functions, participating in eventual suggestions for improvement.
- Adopt consistent and behave actions with the Code of Ethics, refraining from positions that contradict the principles of MAHLE or that may harm its reputation and compromise the integrity and impartiality of the company.

16.2. Violations of this Code of Ethics may lead to the termination of the relationship of trust between MAHLE and the employee, with possible contractual and law consequences concerning the relations provided by the law in force, including dismissal.

16.3. MAHLE does not accept that anyone of its staff, regardless of position or function, take action against an employee who in good faith, use the channels available to report a concern or an event that contravenes the provisions of this Code of Ethics. The company will not tolerate acts which may

embarrass or hurt people who are so legitimately, fulfilling their duty.

16.4. Employees who contravene the explicit ethical business practices within this Code of Ethics or who, knowingly and intentionally, provide false information will be subject to appropriate disciplinary action, including dismissal.

17. Communication Channels

This Code of Ethics does not cover all possible situations, since the dynamics of human action in society is comprehensive and diversified. In case of questions or even suggestions to improve the content of this Code, the employee should contact to present his/her contributions.

MAHLE encourages employees to dialogue with their superiors and representatives of the Human Resources area of their unit.

If the employee wants to express otherwise, he/she can also use the e-mail: etica@br.mahle.com, addressed to the areas of Corporate Human Resources and Internal Controls (Audit).

All referrals must contain identification data so MAHLE can give feedback on the resolution of the manifestations sent.

MAHLE is committed to examine and investigate all reported events, taking appropriate actions in different situations. Cases that require a more careful analysis will be discussed by the Ethics Committee, composed of members from the Board of Directors and corporate areas, such as Human Resources, Legal and internal controls. Complaints will be treated confidentially, looking to protect their authors and the necessary care needed to adequately address the problem.

The Code in practice

Situation: The developer faces a specific situation, not mentioned in this document. Does it mean that the Code does not apply to the problem he is experiencing?

Behavior: As this document provides a general guideline, not specifying

all possible situations, any time the employee may clear out

doubts and share their concerns through the channels of communication previously

mentioned.

LIABILITY AGREEMENT AND ACCESSION COMMITMENT TO THE CODE OF ETHICS OF MAHLE METAL LEVE S.A. AND SUBSIDIARY IN BRAZIL

I, _____ the undersigned, as _____, declare to be aware of the assumptions of the Code of Ethics of MAHLE Metal Leve S.A. and its subsidiaries. Performing the function mentioned above, I agree to comply with the provisions of the document herein, and:

- Act with honesty and integrity, avoiding conflicts, although potential between MAHLE's interests and my personal and business relations.
- Act according to the standards and legal provisions in which the company is subjected to.
- Comply with the utmost confidentiality in the use of company information that is not in the public domain and may be known by virtue of position held, avoiding any use of such information in order to obtain personal advantages or in benefit of others.
- Act according to standards of integrity and ethics, inspired by my behavior and other employees.
- Use the assets and resources of the company in the most correct and professional way.

I declare that I have received, hereby, a copy of the Code of Ethics. I have read, understood and have knowledge about the full content of the document. I am in full agreement with the standards, committing myself to follow them faithfully for the entire duration of my work contract.

Date: ____/____/____ Signature: _____

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