

MODERN SLAVERY ACT STATEMENT

At Stoneridge we are committed to operating with the highest level of integrity. We refer to this as "**Doing the right thing, always.**" We believe in protecting the human rights of all people and will not tolerate slavery and human trafficking in our business or supply chain. We are also committed to compliance with all laws and regulations wherever we do business.

Our Business and Organizational Structure

Stoneridge, Inc. is an independent designer and manufacturer of highly engineered electrical and electronic components, modules and systems principally for the automotive, commercial vehicle, motorcycle, agricultural and off-highway vehicle markets. Headquartered in the USA, Stoneridge's global footprint encompasses 25 locations in 15 countries. The global annual turnover last financial year was £627 million. For more information please visit: www.stoneridge.com.

Our business is organized into three divisions:

- Control Devices:
Our Control Devices division is a leading designer and manufacturer of devices that control, actuate, and connect key vehicle systems including emissions, powertrain, driveline, exhaust, seating, lighting, security, convenience and more.
- Electronics:
Stoneridge's Electronics division is a global designer of highly engineered electrical and electronic components, modules and systems for the commercial vehicle, automotive, off-highway and agricultural vehicle markets. Our aftermarket electronics products are designed and manufactured by Stoneridge Electronics Limited, which is a wholly owned subsidiary of Stoneridge, Inc.
- PST/Positron:
Stoneridge's PST Electronics division designs, manufactures and sells electronics systems for automotive and motorcycle markets in South America. PST Electronics aftermarket products are sold under the Positron brand name.

Our Supply Chains

Stoneridge engages suppliers who are aligned with the company's goals to consistently exceed customer expectations in the planning, execution, and delivery of solutions for the mobility industries we serve. Suppliers who focus on creative solutions, quality, cost and operational excellence are of special interest. These characteristics are the foundation of a successful, long-term partnership.

Our supply chains are based throughout the world and include suppliers of direct materials (see Supplier page on www.stoneridge.com for top 10 commodities), suppliers of indirect materials and services and distributors of our products.

Stoneridge expects that our suppliers will satisfy contractual requirements, understand, and act consistent with Stoneridge's approach to integrity, responsible sourcing, and supply chain management using the principles and values of our Stoneridge Code of Conduct and our Global Quality Agreement (for more details visit: www.stoneridge.com/suppliers/). Any concern our due diligence uncovers is reported to the relevant authorities.

Policies relevant to fighting slavery and human trafficking

Our Core Values reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our business or our supply chains.

- **Code of Conduct** – Our Code applies to all of our employees (full-time, part-time, and temporary), directors, and contractors. It sets forth our fundamental standards of legal and ethical behavior. We expect that suppliers, agents, and others acting on our behalf will act in accordance with the spirit of our Code as well. The Code contains a forced labor/human trafficking clause (see page 38 of the Code at: www.stoneridge.com).
- **Whistleblowing** – Our whistleblowing policy ensures that all employees know they can raise concerns regarding potential ethical or compliance violations within our business or supply chain without fear of retaliation. The Stoneridge Integrity Helpline is operated by an independent third-party and is available to everyone. Reports may be made anonymously, where allowed by local law. For more information visit: www.stoneridgeintegrityhelpline.com.
- **Pay Practices** – We pay our employees in compliance with applicable local law in their country of operation and observe all local labor laws in our hiring practices.

Communication and Training

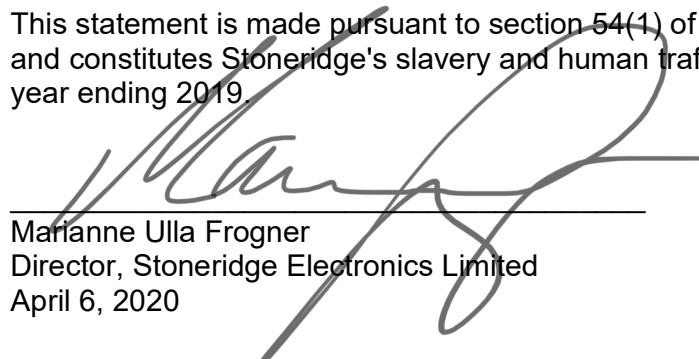
To ensure our employees understand our expectation of being a company that operates with integrity, all new hires are given a Code of Conduct along with our eight global policies when they join the company. All employees are required to attend mandatory Code of Conduct training. Violations of our Code or a company policy may result in disciplinary action, up to and including termination.

Further steps

Moving forward we intend to implement further measures to combat slavery and human trafficking. Those measures include, but are not limited to:

- Provide training to relevant employees to ensure they are alert for any signs of human rights violations such as forced labor, child labor, or human trafficking.
- Invite first-tier suppliers to complete a Supplier Compliance Assessment and confirm their compliance with sustainability standards. The questionnaire specific to this topic will include questions regarding the management of human rights and working conditions (slavery, servitude, forced or compulsory labor, and human trafficking).
- Expand the Supplier Code of Conduct section in our Global Quality Agreement to include stronger language and specific requirements to ensure our trading partners share our value for being a company that operates with integrity.
- Develop a more robust third-party due diligence program to understand and identify risk in our supply chain in relation to slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Stoneridge's slavery and human trafficking statement for the financial year ending 2019.



Marianne Ulla Frogner
Director, Stoneridge Electronics Limited
April 6, 2020