



CORPORATE POLICY

Subject	Department	Number
Global Antitrust and Competition Law	Dana Worldwide	
	Responsible Officer: Chief Compliance Officer	Date of Last Revision: March 2020

1.0 Statement of Policy

Dana people must not collaborate with competitors to restrain competition in areas such as price, credit terms, discounts, service, delivery, production capacity, product quality, or costs. Avoid unnecessary contacts with competitors. Always obey the local laws when pricing the same goods to competing customers or requiring that a customer charge a certain price in reselling a product (including service, warranty, and credit terms).

2.0 Responsibilities

- 2.1 All employees must strictly comply with applicable antitrust/competition and trade practice laws.
- 2.2 Many business arrangements could raise antitrust or competition law issues, including:
 - 2.2.1 Exclusive sale or purchase arrangements;
 - 2.2.2 Selective discounting;
 - 2.2.3 Bundling of goods or services;
 - 2.2.4 Restrictions on resellers;
 - 2.2.5 Technology licensing agreements that place restrictions on the licensee or licensor; and
 - 2.2.6 Any business discussions or agreements with competitors.
- 2.3 Because antitrust and competition laws are not identical in every country, it is important that Dana employees consult their assigned Dana legal counsel as early as possible when planning the types of commercial transactions outlined in this policy.
- 2.4 It is also the responsibility of each employee and in particular those employees who regularly deal with suppliers, sales and marketing, strategic planning, pricing, acquisitions or divestitures, to have a good understanding of how to operate in compliance with applicable antitrust and competition laws.

- 2.5 Employees who are involved in these types of business activities should review the online presentation: [Compliance with Competition Laws](#). In all other regions, the best compliance resource is the Dana legal counsel assigned to the region.
- 2.6 If you are involved in these types of business arrangements, or if you have any questions concerning this policy, please contact the Dana Law Department.

3.0 Prohibited Activities

- 3.1 Antitrust and competition laws generally prohibit certain activities, such as:
 - 3.1.1 Reaching an understanding or agreement with a competitor to restrain trade, for example, by fixing prices, allocating customers or coordinating bidding activities;
 - 3.1.2 Reaching an understanding or agreement with other companies that requires Dana not to do business with another company, for example, an agreement with major distributors not to do business with a discounting distributor.
 - 3.1.3 Abusing a large market-share position by engaging in below-cost pricing in order to harm competitors.

4.0 Compliance

- 4.1 Dana’s Chief Compliance Officer shall regularly assess that the measures in use to achieve compliance with Dana’s Standards of Business Conduct and this policy are sufficient and sustainable. These measures may include periodic employee certifications of policy compliance and requests for disclosures of non-compliance.
- 4.2 If you believe that you have violated this policy, or you observe other Dana employees in violation of this policy, you should report this immediately to your Manager, Human Resources representative, or to the Office of Business Conduct Helpline.
- 4.3 Any employee who fails to comply with this policy may be subject to discipline.

Version	Issue/ Revision Date	Description	Approved By
1.0	June 2012	Initial Release	Executive Committee
2.0	August 2015	Revision	Strategy Board
3.0	October 2016	Revision	Executive Leadership Team
4.0	May 2017	Revision	Executive Leadership Team
5.0	March 2020	Revision adding Section 4.3	Chief Compliance Officer