



MOTORCAR PARTS OF AMERICA, INC.
SUPPLIER CODE OF CONDUCT
REVISED V.5 August 24, 2026

Statement of Policy

The Supplier Code of Conduct (the "Supplier Code") reflects the commitment of Motorcar Parts of America, Inc. ("MPA") to the highest standards of quality products, starting with quality sourcing. In doing business with MPA, foreign and domestic suppliers are expected to meet these standards and comply with the Supplier Code.

The Supplier Code supplements, but does not modify or supersede, any rights or obligations established in the purchase order terms and conditions or in any agreement MPA may have with any of its suppliers. MPA reserves the right to terminate its relationship with a supplier due to its failure to comply with the Supplier Code.

Suppliers shall comply with the principles set forth in MPA's Environmental Policy, Human Rights Policy, and Sustainable Procurement Policy, as applicable to the supplier's operations, and shall maintain policies and practices consistent with those principles.

The Supplier Code of Conduct Policy is available on the MPA corporate website
<https://motorcarparts.com/governance/>

Ethics

MPA expects its suppliers to read and comply with its Code of Business Conduct and Ethics (the "Code of Ethics"), which is available on the MPA corporate website at
<https://motorcarparts.com/governance/>

- Known or suspected violations of the Supplier Code will be reported in the manner set forth in the Code of Ethics
- MPA has adopted an ethics reporting policy for all concerns regarding financial improprieties and unethical activities and has implemented an ethics phone line as one method for reporting these concerns. MPA's suppliers may report their concerns via this phone line, which is administered by an outside, independent service provider. Contact information for the ethics phone line is listed in the Code of Ethics.
- MPA does not currently make any political contributions and does not plan to make any in the future.
- Suppliers shall conduct business with integrity and comply with all applicable anti-corruption and anti-bribery laws, including, without limitation, the U.S. Foreign Corrupt Practices Act and other applicable anti-corruption laws, and shall maintain accurate books and records and avoid conflicts of interest.



Monitoring

- Suppliers shall provide reasonable access to information, documentation, and facilities as necessary for MPA to assess compliance with this Supplier Code of Conduct. Subject to reasonable notice and appropriate confidentiality protections, MPA may conduct, or recognize the results of, third-party social responsibility audits, including assessments of labor practices, human rights, and working conditions, to evaluate supplier compliance with this Code.
- If MPA, its Audit Committee, or its designee determines that this Supplier Code has been violated in any manner by a supplier, such supplier will be re-evaluated and its relationship with MPA may be terminated by MPA.

Quality

- MPA is committed to providing the highest-quality products to its customers.
- To establish and maintain a supply chain quality management system, MPA strongly encourages its suppliers to have the ISO 9001:2015 certification, and or the IATF-16949:2016 certification is preferred.
- Suppliers will undergo monthly performance evaluations that specifically evaluate on-time delivery and quality performance. If MPA determines that a supplier is not performing as required, MPA reserves the right to suspend all orders until corrective actions are taken.

Compliance with Laws, Rules, and Regulations

Suppliers shall comply with all applicable laws, rules, and regulations in the jurisdictions in which they operate or provide products or services, including but not limited to anti-corruption laws, trade compliance requirements, and sanctions regulations.

Suppliers shall comply with all applicable U.S. sanctions laws and regulations administered by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC), including applicable sanctions programs.

Due to the diversity among sanctions, we advise visiting

<https://home.treasury.gov/policy-issues/financial-sanctions/sanctions-programs-and-country-information>

Supply Chain Transparency

Suppliers should promote transparency in their supply chains by providing accurate and reliable information about the origin, quality, and safety of their products.

Suppliers shall communicate and cascade the principles of this Supplier Code of Conduct to their own suppliers and subcontractors and shall implement risk-based due diligence procedures reasonably designed to identify and address legal, ethical, labor, human rights, environmental, trade compliance, and sanctions-related risks within their supply chains.



Conflict of Interest

- Suppliers should avoid even the appearance of a conflict of interest.
- Suppliers should avoid any conflicts of interest that may compromise their objectivity or ability to fulfill their contractual obligations. Disclosures of any such conflicts should be addressed with any necessary or appropriate measures.

Data Protection and Confidentiality / Information Security

Suppliers shall develop and implement a cybersecurity program designed to provide structured and thorough cybersecurity risk management and governance. Such a program should prioritize, among other things, prevention of unauthorized access; protection of sensitive information; detection, assessment, and response to cyber threats; and continuous improvement of the supplier's cybersecurity measures. The cybersecurity program should be aligned with recognized industry standards, such as the NIST Cybersecurity Framework, ISO/IEC 27001, or an equivalent framework.

Responsible Minerals Due Diligence

Pursuant to Rule 13p-1 of the Securities Exchange Act of 1934 (the "Rule"), MPA has adopted a Policy Statement on Conflict Minerals that is available on its corporate website:

- https://s25.g4cdn.com/348864144/files/doc_governance/2024/s-policy-statement-on-conflict-minerals-updated.pdf
- https://s25.g4cdn.com/348864144/files/doc_document_list/2026/Jun/03/s-Conflict-Minerals-Disclosure-May-2026-a7ddeb.pdf

Responsible minerals refer to minerals that are sourced and produced in a manner that respects human rights, avoids contributing to conflict, and minimizes negative environmental degradation. Suppliers are specifically encouraged and expected to conduct due diligence by tracing the origin of minerals in their supply chains and promote conflict-free sourcing.

Customs-Trade Partnership against Terrorism/Importer Security Filing

MPA is a certified member of CTPAT and encourages all its business partners, including suppliers of tangible goods, to adopt security-minded strategies and procedures that meet the CTPAT Minimum Security Criteria (MSC).

All MPA's qualified foreign suppliers, logistics service providers, U.S. Customs Brokers, and U.S. suppliers that source from abroad must either be:

- (1) CTPAT Certified; If your company is a certified member of CTPAT, please send us a request to monitor your company's certification via the Status Verification Interface (SVI) page of your CTPAT Portal account.



(2) A certified member of a foreign supply chain security initiative that has a Mutual Recognition Arrangement (MRA) with U.S. Customs and Border Protection (CBP) listed below:

- Brazil - Operador Econômico Autorizado (OEA)
- Canada – Partners in Protection (PIP)
- Colombia – Operador Económico Autorizado (OEA)
- Dominican Republic – Operador Económico Autorizado (OEA)
- Guatemala – Operador Económico Autorizado (OEA)
- Israel – Authorized Economic Operator (AEO)
- Japan – Authorized Economic Operator (AEO)
- Jordan – Golden List
- Korea – Authorized Economic Operator (AEO)
- Mexico – Operador Económico Autorizado (OEA)
- New Zealand – Secure Export Scheme (SES)
- Peru – Certified Customs User (UAC-OEA)
- Singapore – Secure Trade Partnership (STP)
- Taiwan – Authorized Economic Operator (AEO)
- European Union – Authorized Economic Operator (AEO)
- United Kingdom – Authorized Economic Operator (AEO)
- Uruguay - Operador Económico Calificado (OEC)

If your company is certified in a supply chain security initiative listed here, please provide us with proof of certification.

These countries including the countries in the European Union have a Mutual Recognition Arrangement (MRA) with U.S. Customs and Border Protection (CBP).

(3) or complete the PUFM-0011 MPA CTPAT Re-Evaluation Questionnaire.

Any highway carrier that will transport cargo within Mexico and/or from Mexico into the U.S. must be CTPAT Certified.

If your company is not a certified member of CTPAT or any of the above programs, we are obligated by CBP to ensure that each of our supply chain business partners complies with the CTPAT Minimum Security Criteria (MSC).

- [CTPAT - Minimum Security Criteria - Foreign Manufacturers \(cbp.gov\)](#)
 - [CTPAT - Minimum Security Criteria - Consolidators \(cbp.gov\)](#)
 - [CTPAT - Minimum Security Criteria for 3PLs \(cbp.gov\)](#)
 - [CTPAT - Minimum Security Criteria - U.S. Customs Brokers \(cbp.gov\)](#)
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- International suppliers must provide MPA with Importer Security Filing (ISF) information no later than 72 hours before cargo is laden aboard a vessel destined for the United States.
 - MPA will invoice its suppliers for any fines or penalties received relating to non-compliance with the ISF.



Health and Safety

Suppliers shall comply with all applicable health, safety, and chemical regulatory requirements, including, where applicable to the supplier's products, services, operations, or geographic markets, REACH, RoHS, TSCA, Proposition 65, and other applicable laws and regulations.

Suppliers shall provide material disclosures, safety data sheets (SDS), and regulatory compliance information upon request, subject to applicable confidentiality obligations, trade secret protections, and applicable law.

- MPA encourages its suppliers to meet or exceed all applicable environmental laws and standards, including, but not limited to, OSHA's Hazard Communication Standard (HCS) 29 CFR 1910.1200, revised in 2012, which requires that the chemical manufacturer, distributor, or importer provide Safety Data Sheets (SDSs) for each hazardous chemical to downstream users to communicate information on these hazards.
- MPA strongly encourages Full Material Disclosures to be available as requested or required, and for material composition declarations to meet the regulatory requirements, as listed below.
- Certain MPA's suppliers may supply products containing chemicals subject to CA Proposition 65. Accordingly, to ensure its compliance with CA Proposition 65, MPA may require its suppliers to declare, at the times and in the manner it deems necessary, if their products will expose consumers to all chemicals known to the State of California to cause cancer (see <http://oehha.ca.gov/proposition-65> ; <https://oag.ca.gov/prop65/faqs-view-all#businesses> ;
- EPA (United States Environmental Protection Agency) - Regulation of Chemicals under Section 6 (a) of the Toxic Substances Control Act (TSCA). <https://www.epa.gov/assessing-and-managing-chemicals-under-tscaregulation-chemicals-under-section-6a-toxic-substances#tsc> Suppliers shall comply with applicable restrictions and requirements under the Toxic Substances Control Act (TSCA), including applicable regulations promulgated pursuant to TSCA Section 6, <https://www.epa.gov/pcbs>
- EU REACH (Registration, Evaluation, Authorization and Restriction of Chemicals, EC 1907/2006) is the European Union's chemical regulation that requires that chemical substances on their own, in preparations and all intentionally released substances from articles must be registered with the European Chemicals Agency (ECHA). The regulation applies to substances manufactured in or imported to the EU in annual quantities of one ton or more. According to the REACH requirements on Substances of Very High Concern (SVHC), a supplier of manufactured and imported articles shall provide customers with information on SVHC if they are present above a concentration limit of 0.1% on an article level. SVHC will be defined through the list of candidate substances for authorization that is produced by the European Chemicals Agency.

<https://www.echa.europa.eu/candidate-list-table> link for the REACH chemical substances.



- RoHS Compliant? "Restriction of Hazardous Substances in Electrical and Electronic Equipment" (RoHS). Also, an EU Regulation and worldwide, see the following link for these restricted substances. <https://www.rohsguide.com/rohs-substances.htm> ; <https://www.rohsguide.com/rohs-future.htm> for Worldwide RoHS Initiatives.
- **For Packaging Suppliers** - are you compliant with heavy metals content? <https://echa.europa.eu/heavy-metals-packaging-waste> and [Toxics in Packaging | Department of Toxic Substances Control \(ca.gov\)](https://www.cdpr.ca.gov/Programs/OPA/Pages/NR2019-0001.aspx) DTSC limits the content of heavy metals such that the sum of concentration levels of lead, cadmium, mercury and hexavalent chromium present in the packaging or packaging components shall not exceed 100 ppm by weight.
- IPPC ISPM-15 International Standard for Wood Packaging (Pallets) and Mexican Official Standard NOM - 144 aligns with ISPM-15. MPA requires this standard to be in place and use of the HT marking must be on pallets. Specifically, wood pallets must be Heat Treated (HT) with required marking, as this applies to all our facilities, and specifically any domestic shipments from the USA to Mexico. Suppliers providing wood packaging materials or pallets shall ensure compliance with ISPM-15 and any applicable national implementing regulations, including required heat-treatment markings where applicable.

ENVIRONMENTAL – SOCIAL – GOVERNANCE

Our Supplier Code of Conduct is a set of responsible business standards we use and expect our suppliers to put in place, if not already done so. Sustainable procurement means sustainable initiatives that are implemented, and where the achievements are tracked and reported upon using specific social and environmental standards.

Our Supplier Code of Conduct helps strengthen the relationship with our valued suppliers and encourages innovation, communication, and shared investment, by aligning internal and external stakeholders for forward-looking progress in our sustainability initiatives.

Environmental Sustainability

- Suppliers are expected to minimize their environmental impact by implementing sustainable practices. This includes reducing greenhouse gas emissions, conserving resources, managing waste responsibly, and complying with environmental regulations.
- Review the use of natural resources and raw materials such as water, chemicals, land, and clean air to meet sustainable targets and goals.
- Suppliers are encouraged to establish environmental management systems (e.g., ISO 14001) and to monitor and reduce environmental impacts including greenhouse gas emissions, energy use, water use, and waste.



Management Systems and Compliance

Suppliers shall establish and maintain management systems appropriate to the size and complexity of their operations to ensure compliance with this Code.

These systems should include policies, procedures, training, monitoring, and corrective action processes.

Documentation and Evidence

Suppliers shall maintain appropriate documentation and, upon request, provide evidence demonstrating compliance with this Code, including policies, procedures, training records, and performance data, subject to confidentiality obligations, protection of proprietary information, and applicable law.

Labor and Human Rights

Corporate Sustainability is essential to gain long-term corporate success. We ask you to join MPA in following the Ten Principles of the UN Global Compact:

[The Ten Principles | UN Global Compact](#)

Human Rights

1. Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
2. Principle 2: make sure that they are not complicit in human rights abuses.

Labour

3. Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
4. Principle 4: the elimination of all forms of forced and compulsory labour;
5. Principle 5: the effective abolition of child labour; and
6. Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

7. Principle 7: Businesses should support a precautionary approach to environmental challenges;
8. Principle 8: undertake initiatives to promote greater environmental responsibility; and
9. Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

10. Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.



International Labor Organization ILO Declaration on Fundamental Principles and Rights at Work, see link <https://www.ilo.org/ilo-declaration-fundamental-principles-and-rights-work>; this was adopted in 1998 and amended in 2022 to respect and uphold basic human values.

MPA adheres to the [Universal Declaration of Human Rights | United Nations](#) This link provides 30 article agreements stated in the declaration written in 1948 by the UN General Assembly. The UDHR is recognized worldwide and is available in translations all over the world.



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SUPPLIER ACKNOWLEDGMENT FORM

Supplier Information	
Supplier Name	
Supplier Address	
Contact Name	
Contact Title	
Telephone	
E-mail Address	
Supplier Acknowledgement	<p>As a supplier of MPA, I have read the following MPA policies:</p> <p>https://investors.motorcarparts.com/governance/governance-documents/default.aspx</p> <ul style="list-style-type: none">▪ MPA Code of Business Conduct and Ethics▪ MPA Supplier Code of Conduct Policy <p>https://investors.motorcarparts.com/esg/default.aspx</p> <ul style="list-style-type: none">▪ MPA Policy Statement on Conflict Minerals▪ MPA Global Sustainable Procurement Policy▪ MPA Environmental Policy▪ MPA Human Rights Policy <p>The undersigned acknowledges and agrees to comply with the requirements of this Supplier Code of Conduct and confirms that the information provided is accurate to the best of knowledge and based on reasonable inquiry.</p>
	<p>(Company Name)</p>
Signature Block	
Supplier Signature	
Print Name	
Title	
Signature Date	