

**CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT DISCLOSURE**  
**April 28, 2015**

The California Transparency in Supply Chains Act of 2010 requires manufacturers doing business in California to provide information about their efforts to address the issue of slavery and human trafficking within their supply chain.

Delphi fully supports these efforts, which align with our core values and beliefs. Delphi's Code of Ethical Business Conduct plainly states ***"We do not use forced or slave labor."*** And we require the same of our suppliers – our Supplier Code of Conduct (which all of our key suppliers agree to follow) makes clear that suppliers (and their suppliers) will not ***"use or tolerate forced or involuntary labor."***

Our efforts to address slavery and human trafficking in our supply chain include:

- Verification of Product Supply Chain: Delphi's Supplier Code of Conduct requires suppliers (and their suppliers) to refrain from the use of forced labor or involuntary labor. We work with external stakeholders that advance the goal of building a more transparent supply chain. Delphi also participates in industry groups that allow us to share best practices and obtain information that can help improve operations and the supply chain.
- Supplier Audits: We reserve the right to conduct unannounced audits of our suppliers, including inspection of facilities and review of documentation, to ensure compliance with our standards. As part of Delphi's Manufacturing Capability Assessment audit process, Delphi auditors inspect supplier records and observe operations. If any inappropriate conditions are observed or suspected, the situation is reviewed for appropriate action.
- Certification: Delphi's key suppliers are required to agree to the principles articulated in our Supplier Code of Conduct. In addition, Delphi's General Terms and Conditions require suppliers to commit that they will not utilize "slave, prisoner or any other form of forced or involuntary labor or engage in abusive employment in the supply of Goods under this Contract." Our purchase orders contain similar language prohibiting suppliers from utilizing forced or slave labor.
- Accountability: If Delphi learns of suppliers or sub-suppliers who utilize forced or involuntary labor, we will take appropriate action to remedy the situation, including terminating business relationships where necessary.
- Training: All Delphi salaried employees receive training regarding our Code of Ethical Business Conduct, which includes prohibitions on slavery and human trafficking. In addition, Delphi's purchasing professionals receive training that specifically addresses the issue of forced or involuntary labor in the supply chain.