

ADIENT PLC

REGULATION FD POLICY

Adient plc (“Adient”) is committed to the fair disclosure of accurate information about Adient to the public on a timely and consistent basis without advantage to any member of the investment community consistent with legal and regulatory requirements, including Regulation Fair Disclosure (“Regulation FD”) adopted by the U.S. Securities and Exchange Commission (the “SEC”). It is imperative that the disclosure practices in this Policy are consistently applied by Adient, and that all members of the investment community, including individual investors, have prompt and simultaneous access to information disclosed by Adient. This Policy confirms Adient’s commitment to provide investors material information when required or otherwise deemed appropriate by management in a broad, non-exclusionary fashion.

I. Scope of this Policy. This Policy covers all employees of Adient, its subsidiaries and majority-owned affiliates, the members of Adient’s Board of Directors and consultants to Adient (the “Covered Individuals”). It covers disclosures of material, nonpublic information in documents filed with the SEC, news and earnings releases, speeches and other presentations by senior management as well as information provided by Adient on its website. In addition, this Policy covers statements of material, nonpublic information made in group and individual meetings, phone calls, webcasts and events with analysts and investors, and interviews with the media, as well as press conferences and all other forms of communication of material information, including those made via social media, reasonably likely to be transmitted directly or indirectly to the public.

II. Prohibition on Selective Disclosure of Material, Nonpublic Information. Covered Individuals are prohibited from selectively disclosing material, nonpublic information about Adient to securities market professionals (including analysts, broker-dealers and investment advisers), investors (current and potential) or anyone else that is not subject to a confidentiality agreement or does not otherwise owe a duty of trust or confidence to Adient, unless the Covered Individual is authorized to do so by this Policy and the information is simultaneously disclosed to the general public.

A. What is “Material” Information. Information is material if there is a substantial likelihood that a reasonable investor would consider it important in making an investment decision. There must be a substantial likelihood that such information would have been viewed by a reasonable investor as having significantly altered the “total mix” of information available. Both positive and negative information can be material. The types of information or events that the SEC has indicated are likely to be considered material include (but are not limited to) the following:

- projections, guidance or forecasts regarding future earnings or losses;
- significant mergers, acquisitions, tender offers, joint ventures or changes in assets;
- default on debt obligations;
- new products or discoveries, or developments regarding customers or suppliers, such as the acquisition or loss of a significant customer or contract;

- changes in ownership control or in key management;
 - a change in auditors or an auditor's notification that Adient may no longer rely on the auditor's reports;
 - cybersecurity risks and incidents, including vulnerabilities and breaches;
 - events regarding Adient's securities, such as calls of securities for redemption, repurchase plans, stock splits or changes in dividends, changes in the rights of security holders, or public or private sales of additional securities by Adient;
 - bankruptcies, receiverships, insolvency or other significant liquidity events;
- and
- significant actual or threatened litigation, or the resolution of such litigation.

B. What is Nonpublic Information. "Nonpublic" information is any information that has not been disseminated in a manner reasonably designed to make it generally available to investors. Information is no longer considered to be nonpublic after it has been released broadly to the marketplace and the investing public has had time to fully absorb the information.

III. Designated Spokespersons. The Chief Executive Officer, the Chief Financial Officer, and the Vice President – Investor Relations (or the equivalent position) are designated as the Primary Spokespersons to financial audiences, the financial media and the investment community (e.g., securities market professionals and investors) for Adient. In certain circumstances, a Primary Spokeperson may designate others within or serving Adient as Authorized Spokespersons to speak on behalf of Adient or to respond to specific inquiries from the financial media or the investment community. Any Authorized Spokesperson will be notified in advance and will be provided appropriate training by the Director – Corporate Governance & Securities (or the equivalent position) regarding compliance with this Policy. Only a Primary or Authorized Spokesperson is authorized to talk to investors or the investment community, including analysts, on behalf of Adient.

The Vice President – Investor Relations shall be primarily responsible for scheduling and developing presentations for all meetings and communications with investors or the investment community. All inquiries from such sources must be immediately referred to the Vice President – Investor Relations.

IV. Disclosure Committee. Adient has established a Disclosure Committee, which assists Adient in ensuring that (i) all disclosures and forward-looking statements made by Adient to investors and the investment community are accurate and complete; (ii) all disclosures fairly present Adient's financial condition and results of operations in all material respects; and (iii) all disclosures are made on a timely basis. The Disclosure Committee assists the Chief Executive Officer and Chief Financial Officer in fulfilling their responsibility for oversight of the accuracy and timeliness of disclosures made by Adient. The Disclosure Committee's members, duties and responsibilities are detailed in its charter. The Disclosure Committee will review and update this Policy at least annually, if necessary.

It is essential that the Disclosure Committee be fully apprised of all Adient developments that may be material. The Disclosure Committee will evaluate those events to determine the appropriateness and timing for public release, or whether the information should remain confidential. In addition,

the Disclosure Committee may involve one or more key executives from Adient's operating subsidiaries or divisions to discuss and gain a better understanding of material operational developments in the course of carrying out its responsibilities.

V. Responding to Inquiries. Covered Individuals (other than the Primary or Authorized Spokespersons) are not authorized to respond, under any circumstances, to inquiries from the investment community or investors. Covered Individuals are instructed to immediately refer all such inquiries to the Vice President – Communications and Investor Relations.

VI. Methods for Public Disclosure. Adient will disseminate material information only through one or more methods reasonably designed to provide simultaneous broad, non-exclusionary distribution of the information to the public. The only exceptions to this provision are when the recipient of the information has expressly agreed in writing to keep it confidential pursuant to a non-disclosure or confidentiality agreement or has a duty of trust or confidence to Adient (e.g., outside auditors or legal counsel). In addition to Adient's SEC filings, all news releases and other material written public disclosures will be made available on Adient's website.

Under normal circumstances, the release, filing or disclosure containing the material information about Adient will be reviewed and approved by the Disclosure Committee in advance; provided, however, that an exception may be made in the case of an inadvertent disclosure of material, nonpublic information on a selective basis, where the need for immediate release would require that the normal review and approval process be abbreviated.

VII. Inadvertent Disclosures. Should a Covered Individual make an inadvertent or unintentional disclosure of material, nonpublic information on a selective basis (e.g., at an analyst or investor meeting), Adient will promptly (but in no event after the later of 24 hours or the commencement of the next day's trading on the New York Stock Exchange (the "NYSE")) broadly disseminate that information publicly. If a Covered Individual believes that an inadvertent disclosure of material, nonpublic information about Adient has been made, such disclosure must be immediately reported to a Primary Spokesperson, typically the Chief Financial Officer or the Vice President – Communications and Investor Relations and to the General Counsel.

VIII. Responding to Market Rumors. So long as it is clear that Adient is not a source of the market rumor (in which case the General Counsel should be consulted to determine an appropriate response), Adient's Primary and/or Authorized Spokespersons will respond consistently to market rumors by saying, "It is our policy not to comment on market rumors or speculation." Should the NYSE request that Adient make a definitive statement in response to a market rumor that is causing significant volatility in Adient's stock, the Disclosure Committee will consider the matter and make a recommendation to the Chief Executive Officer regarding an appropriate course of action.

IX. Forward-Looking Statements and the PSLRA of 1995. Adient may, from time to time, make forward-looking statements using the safe harbor provided in the Private Securities Litigation Reform Act of 1995 (the "PSLRA") to enable the investment community to better evaluate Adient and its prospects for performance, provided that Adient will not do so on a selective basis and will otherwise comply with this Policy. Adient will review its cautionary language regarding forward-looking statements on a regular basis.

All material, forward-looking statements made in Adient's written or oral disclosures must be identified as such and accompanied with meaningful cautionary language that warns investors that actual results could vary from such statements. A Primary or Authorized Spokesperson may refer in oral statements to a readily available written document (e.g., Adient's latest earnings release or the risk factors from Adient's most recent Form 10-K) for appropriate cautionary language.

The treatment of forward-looking statements during conference calls is discussed in this Policy under Section XI.A.3.

X. Quiet Periods. Without limiting the prohibitions contained in Section II of this Policy, in general, Primary or Authorized Spokespersons will not communicate with any securities market professionals or shareholders during the period beginning with the 15th day of the last month of each calendar quarter and ending with the issuance of a normal quarterly earnings release (the "Quiet Period") and will not otherwise comment on our financial or business performance or prospects during the Quiet Period. If circumstances are such that any of the Primary Spokespersons believes it is necessary or desirable to communicate with such persons or to comment on such matters during the Quiet Period, then Adient will do so in a manner that complies with Regulation FD. Further information regarding Adient's actions during a Quiet Period are contained in Appendix A.

Any exceptions to these Quiet Period policies may be made only with the prior approval of the General Counsel.

XI. Common Situations

A. Quarterly Earnings Conference Calls

1. Webcasts. Adient anticipates that it will webcast conference calls with analysts and investors on a quarterly basis, normally the day of or the day after the quarterly earnings release has been issued.

2. Notice. Adient will announce, via press release, the date and time of its quarterly earnings conference call, and will post information regarding the call on its website, at least several days in advance of the call, unless special circumstances require a shorter period. Individual investors or media not invited to participate on an interactive basis will be able to listen to the webcast or conference call on a real-time basis. A recording of the call will be available for at least one week after the call on Adient's website and retained for one year as part of Adient's disclosure record.

3. Cautionary Statements under the PSLRA of 1995. At the beginning of the conference call or webcast, an Adient spokesperson will make a statement that forward-looking information may be discussed during the course of the call and will also refer the audience to appropriate cautionary language or reference cautionary statements contained in readily available (publicly-released) documents.

4. Scripts, Outlines and Presentations. A script, outline and/or other presentation will be prepared for any conference call, as well as for any other group presentation to securities market professionals or investors. Adient will identify beforehand those issues that are anticipated to be raised during such calls or presentations, and the appropriate responses thereto, so as to avoid accidental disclosure of material, nonpublic information. All Primary or Authorized Spokespersons who might be involved in responding to those issues will be briefed before any such call or presentation.

5. Monitoring. At a minimum, the General Counsel or Director – Corporate Governance & Securities, will listen to each conference call to ensure compliance with this Policy.

B. Industry and Investor Conferences. Primary or Authorized Spokespersons may speak at industry or investor conferences provided that each such person’s presentation and any related question and answer period will be simultaneously webcast or otherwise simultaneously broadly disseminated. At a reasonable time prior to the conference, ideally at least three business days in advance, a press release should be issued by Adient that sets forth the time and date of the conference and the access information, including webcast instructions. Replays will be available for at least one week following the day of the presentation on Adient’s website, or via a link on Adient’s website to the website of the webcast, and will then be removed.

The Vice President – Investor Relations will ordinarily pre-brief Adient participants before such a conference to insure that material, nonpublic information is not disclosed. However, if Adient expects to deliver material, nonpublic information during the conference, a press release must be issued immediately prior to or simultaneously with the start of the conference that describes the information being disclosed.

C. Meetings with Analysts and Investors

1. Types of Meetings. Historically, meetings with analysts and investors have taken many forms, including “one-on-one” and small group discussions with analysts and investors, as well as group presentations and similar sessions at industry and issuer conferences, or at Adient’s or investors’ offices. These meetings can present significant disclosure risks. Any such meeting should be held as close in time as possible following the public release of information by Adient, such as shortly after the quarterly earnings release.

2. Precautions. The Vice President – Investor Relations will ordinarily pre-brief Adient participants before a meeting with analysts or investors one-on-one, a group meeting or a financial media interview to ensure that material, nonpublic information is not disclosed. One or more members of the Disclosure Committee or Adient’s Investor Relations department will also be part of any such meeting or interview. External (i.e., non-Adient) participants in such a meeting or interview should be asked to provide an agenda in advance of any discussion to allow consideration of potential questions and areas of particular sensitivity. If, during any such discussion, material, nonpublic information is inadvertently provided, the Adient participants should attempt to obtain an express confidentiality agreement before the discussion concludes; if a confidentiality agreement cannot be obtained, the General Counsel should be immediately contacted.

The Vice President – Investor Relations will also meet with Adient participants after such a meeting or interview to determine whether material, nonpublic information about Adient was disclosed and, if so, what remedial actions should be taken.

The General Counsel will periodically attend scheduled meetings and conferences with analysts and investors to assure compliance with this Policy.

D. Providing Guidance with Respect to Earnings per Share Estimates and Reviewing Analysts' Draft Models or Reports

1. Guidance. Adient will not comment on or confirm its “comfort level” with analyst projections except through broadly disseminated, public disclosure.

2. Review of Analyst Reports or Models. Adient will not comment on analyst reports or models, other than to correct information in the reports or models based on previously disclosed public or historical information, or to correct factually inaccurate non-material qualitative information. Analysts requesting a review of draft reports or models should be informed of the limits governing Adient’s review.

3. Referring to or Distributing Analyst Reports On Adient. Adient regards analyst reports as proprietary information belonging to the analyst's firm and will not provide such reports on Adient’s website or through any other means to persons outside of Adient. Analyst reports on Adient and available industry reports may be provided periodically to the Board of Directors, senior management and other employees. Distribution of these reports internally is for informational purposes only and shall not be represented as an endorsement of the analyst’s opinion.

XII. Questions About this Policy. All questions and inquiries regarding this Policy should be addressed to the General Counsel or the Vice President – Communications and Investor Relations, and, in their absence, to a member of the Disclosure Committee.

Effective: January 2019

APPENDIX A

As a general rule, Adient will not communicate with any securities market professionals or investors regardless of format during the Quiet Period regarding Adient's financial or business performance or prospects. If Adient believes that it is necessary or desirable to communicate with such parties during the Quiet Period, any such communication will be made in a Regulation FD compliant manner.

By way of example, the following table outlines the types of events and communications that are allowed and not allowed during Adient's Quiet Period. This list does not address all possible communication scenarios and each scenario will be addressed on a facts and circumstances basis subject to the terms of Adient's Regulation FD Policy.

<u>Event</u>	<u>Rules</u>
<ul style="list-style-type: none">• One-on-one meetings with any securities market professionals or shareholders• Securities firm conferences and other investor presentations	<ul style="list-style-type: none">• Prohibited during the Quiet Period• Allowed during the Quiet Period; provided, however, that no discussions of earnings, earnings estimates, quarterly and annual financial results, or other material, nonpublic information will take place and any such conferences or presentations will be conducted in a Regulation FD compliant manner

<u>Types of Communications</u>	
<u>Allowed</u>	<u>Not Allowed</u>
<ul style="list-style-type: none">• Information of a historical nature that has already been publicly disclosed, including high level strategy, so long as the communication is not for the purpose of directing the recipient in any way as to material, nonpublic information• Communications of an administrative nature, such as scheduling calls or events	<ul style="list-style-type: none">• Any discussion or other communication regarding earnings, earnings guidance or estimates, quarterly or annual financial results or forecasts, or other material, nonpublic information