



**Dana Incorporated
U.S. Economic Sanctions Compliance
Corporate Policy Statement**

Statement of Policy

This statement supplements the Dana Incorporated ("Dana") U.S. Export and Foreign Trade Controls Compliance Corporate Policy Statement issued in February 2010. As noted in that document, the United States maintains economic sanctions against several countries, and it is Dana's policy to comply with those sanctions. In the past, it had been the policy of Dana that non-U.S. Dana subsidiaries could engage in certain transactions with these sanctioned countries so long as the transactions were consistent with U.S. laws. The scope of U.S. economic sanctions, however, has been changing rapidly. To ensure Dana's compliance, Dana has chosen to simplify its approach by prohibiting all new business with any sanctioned country, even where the business may be legal for non-U.S. Dana subsidiaries.

The policy stated here means that no Dana entity subject to this policy, as noted below, may pursue, or engage in new transactions with countries subject to U.S. economic sanctions. Those countries currently are Burma, Cuba, Iran, North Korea, Sudan, and Syria, but this list could change in the future.

Scope

This policy is to be observed by Dana, its U.S. subsidiaries, and their branches worldwide. The policy is also to be observed by Dana's non-U.S. subsidiaries. For the purposes of this policy, a "subsidiary" means any entity that is majority-owned or managerially controlled by Dana.

If you have any questions concerning this policy, please raise them with your supervisor or contact Joseph Heckendorn, Senior Counsel, at 419-887-5215 or joseph.heckendorn@dana.com. You may also submit a concern about this policy anonymously at mydana.ethicspoint.com. No adverse action will be taken against a Dana person for raising a concern about compliance with this policy provided the concern is raised in good faith.