

Insider Trading Policies

ArvinMeritor's corporate policies prohibit improper use of company information and require compliance with laws. To further these policies, the general counsel's office has developed practices to ensure that insiders are not using stock trades to benefit from knowledge gained in their positions. In general, these practices consist of the following:

- All officers and directors receive written compliance information and counseling on the requirements in this area when they assume their roles. This information is updated periodically to reflect changes and developments, and periodic reminder letters are sent to each individual.
- All officers are required to get clearance from the general counsel prior to engaging in any discretionary transaction in ArvinMeritor securities. Directors are strongly encouraged to consult with the general counsel prior to engaging in any trades.
- All employees are prohibited from trading in ArvinMeritor securities when they are in possession of material non-public information. Employees are also prohibited from trading in securities of any other company, when they possess material non-public information about a transaction between that company and ArvinMeritor. Each officer is provided written information on this subject and is charged with sharing with his subordinates information on the importance of this prohibition.
- Trading stops are in place with the trustee for ArvinMeritor's savings plans and the administrator for the option and restricted stock plans, which prevent trades by officers and directors without prior approval of the general counsel.
- The general counsel's office is available to counsel insiders on permitted and prohibited activities.
- The general counsel uses a calendar of trading windows and blackouts to advise all officers and any employees with access to earnings information as to the timing of trades in relation to the availability and release of corporate earnings.

Use the link below to view reports of Forms 3 and 4 filed with the Securities and Exchange Commission, reporting transactions by insiders in ArvinMeritor securities.

[Section 16 filings](#)