

APPENDIX A:
ADDITIONAL CORRECTIVE MEASURES

Defendants shall undertake additional corrective measures, as specified below, to change their testing and training processes for purposes of certifying their motor vehicles in the United States automotive market pursuant to 40 C.F.R. Part 86. Defendants shall comply with the requirements of this Appendix A and Section VII of the Consent Decree (collectively, "Corrective Measures").

1. Independent Certification Group

By no later than the Effective Date of the Consent Decree, Defendants shall form an independent certification group ("Independent Group" or "Group") for the purpose of performing and managing Corrective Measures by no later than the dates set forth in this Appendix A. The members of the Independent Group shall have no role in Defendants' vehicle development. At least one representative of the Independent Group shall be from HATCI. The HATCI representative in the Group shall be a HATCI Senior Manager of Certification and Compliance or a direct report to that manager.

2. Certification Training

By January 1, 2016, the Independent Group shall train all managers, engineers, technicians, contractors and other persons responsible for the certification of motor vehicles for the United States market ("Certification Personnel") in the relevant procedures and methods before they engage in certification testing. Certification Personnel shall receive training sessions on aspects of certification for which they are responsible, which may include one or more of the following sessions:

- (a) certification (including coastdown) testing;
- (b) 4,000 mile certification vehicle preparation;
- (c) emission test cell maintenance and calibration procedures;
- (d) emission regulations; and
- (e) test data management systems.

After January 1, 2016, the Independent Group shall provide periodic training updates to Certification Personnel.

3. Establishment of a Certification Testing Program

By January 1, 2016, the Independent Group shall manage, supervise and conduct certification testing. The Independent Group may utilize testing facilities and technicians

assigned to other organizations provided that the Independent Group controls the certification testing.

4. Obtaining and Testing of the Certification Test Vehicle

By January 1, 2016, the Independent Group shall be responsible for obtaining and testing of the certification test vehicles, specifically:

- (a) taking custody of the certification vehicles;
- (b) confirming that the configuration of the certification vehicles is representative of the relevant production vehicles; and
- (c) testing the certification vehicles.

5. Review of Certification Test Data for Accuracy

By January 1, 2016, the Independent Group shall confirm the accuracy of all certification test data, including all data submitted to the EPA.

6. Supervision of Certification Personnel

By January 1, 2016, the Independent Group shall supervise all Certification Personnel, providing appropriate training as prescribed in this Appendix A, and control access to certification vehicles.

7. Enhanced Data Management and Review of Coast Down Data

By January 1, 2016, the Independent Group shall oversee a centralized database to ensure quality and control of coast down data from testing of the Defendants' vehicles. The Independent Group shall periodically perform a quality check of Defendants' coast down data, including analyzing coast down data from comparable vehicles to determine whether Defendants' data is consistent with results expected for vehicles of that type.

8. Annual Progress Reports

As specified in Paragraph 19 of Section VII (Corrective Measures) of the Consent Decree, Defendants shall submit annual progress reports that provide information describing the progress toward meeting the requirements of this Appendix A.

9. Revised Coast Down Testing Protocol

Defendants' first progress report pursuant to Paragraph 19 of Section VII (Corrective Measures) shall include their current written coast down testing protocol and an explanation of the material changes made to the current protocol since November 2, 2012.

10. Completion Report

No later than April 1, 2018, Defendants shall submit to the Plaintiffs a Corrective Measures Completion Report. The report shall provide sufficient information to verify the completion of the measures in Section VII of the Consent Decree (Corrective Measures) and the additional measures set forth in this Appendix A.