

Anti-Harassment Policy

1. Policy Summary

Every employee has the right to be treated with dignity and respect and to work in an environment free of discrimination and harassment. We can create a harassment-free environment as long as everyone at Aptiv understands what harassment is. Supervisors have the extra responsibility to create an environment where harassing behavior is not part of the culture.

2. Why Do We Have this Policy?

At Aptiv, we are committed to providing all employees with a safe workplace that is free from discrimination and harassment.

Your first priority as a Aptiv employee is to behave in a manner consistent with our DRIVE principles (Diversity, Respect, Integrity, Value, and Excellence) and company policies. This includes treating everyone at our company with respect and dignity. As an employee, you must be aware of and follow this Anti-Harassment Policy.

This policy applies to everyone at Aptiv, including all employees, senior leadership, and management worldwide.

3. What are the Key Principles of this Policy?

A. Always Act Professionally and Treat Others with Respect

Professional, respectful behavior is expected of every employee--regardless of job category or level. Each of us should behave in a manner consistent with our ethical principles and Aptiv company policies, and work to create a workplace that promotes personal fulfillment and satisfaction.

We must always maintain a professional work environment and understand discrimination and harassment so we can avoid it. Harassment is behavior that is based upon or relates to a person's protected status and has the purpose or effect of creating a hostile, offensive or intimidating workplace environment. Harassment can come in many forms, including unwelcome verbal, physical, or visual conduct.

At Aptiv, we should understand that protected status can encompass any of the following and we do not harass or discriminate based on any of them:

- Race
- Ethnicity
- Color
- Gender

Contact the Aptiv DRIVE Line at <http://driveline.aptiv.com/> to report an issue online or by phone

- Sexual orientation
- Religion
- Age
- Union activities
- Political beliefs
- National origin
- Disability / Handicap
- Genetic information
- Veteran status or disabled veteran status
- Marital status
- Pregnancy status
- Any other status that is protected by law in a particular jurisdiction

Question and Answer

Q: One of my customers seems to tell a lot of inappropriate stories and jokes. It makes me feel really uncomfortable and I've tried to politely tell him that he isn't funny but he continues to act this way. What can I do? I'm trying hard not to offend a customer.

A: Aptiv expects our outside contractors and all other non-employees including agents, suppliers, business partners, and customers to conduct business in a professional manner, and to adhere to our standards and policies while on Aptiv premises or conducting business with us or on our behalf. You should immediately report this inappropriate behavior to your supervisor or a member of the Human Resources staff. You may also contact the Aptiv DRIVE Line. And you should know that we do not retaliate in such circumstances. Doing the right thing is never wrong.

B. Sexual Harassment Has No Place at Aptiv

One particularly serious form of inappropriate behavior is sexual harassment. It not only violates Aptiv's policy, it is disrespectful, and (in many locations) illegal. Aptiv expects the work environment to be harassment-free, and wants all employees to feel comfortable at work and at work-related events.

Behavior such as sharing obscene material or any unwelcome physical contact is clearly inappropriate at work. But less extreme behavior can also create an uncomfortable environment that violates company policy, and may also violate the law. Sexual harassment can occur in subtle and obvious behaviors, and may involve individuals of the same or different gender. Behavior that one employee may regard as "harmless" or "fun" may be offensive to another employee.

Remember that sexual harassment does not always involve supervisors and subordinates. Anyone whose behavior affects someone else's ability to do his or her job by creating a

hostile work environment through sexually-oriented comments or behavior can be a harasser – whether it’s a supervisor, coworker, or even a non-employee, like a vendor or contractor.

The best course of action is for employees to avoid all sexual comments, behavior, and materials at work.

Unacceptable behaviors include, among others:

- Unwelcome sexual advances
- Discussing sexual activities
- Telling off-color jokes (orally or in writing, including by e-mail)
- Unwelcome touching
- Commenting on physical attributes
- Making or using derogatory comments, epithets, slurs, or jokes
- Leering, making sexual gestures, or displaying sexually suggestive objects, pictures, cartoons, or posters
- Sexual comments including graphic comments about an individual’s body, sexually degrading words used to describe an individual, or suggestive or obscene letters, notes, or invitations
- Using demeaning or inappropriate terms
- Granting job favors to those who participate in consensual sexual activity

These types of behaviors have no place at work or at work-related social events, business meetings or business trips.

Question and Answer

Q: My supervisor has asked me out on a date several times, and I’ve always refused. This time, he told me that if I go out with him he’ll make sure I move to the front of the line for an upcoming promotion. Does that constitute sexual harassment?

A: Yes. Sexual harassment occurs not only when a hostile work environment is created through sexually-oriented comments or images, but also when employment decisions or expectations such as hiring decisions, promotions, wage increases, shift or work assignments, and performance expectations are based on an employee’s willingness to grant sexual favors (this is sometimes referred to as “quid pro quo” harassment).

Some examples of prohibited employment decisions or actions could include:

- A supervisor or manager promises a promotion, raise, or favorable review in exchange for sex.
- An employee is discharged or subject to other adverse employment action because she ended a romantic relationship with her boss.
- An employee is reassigned after refusing to begin a romantic relationship with a supervisor or manager or complaining about the manager’s overtures.

You should immediately report your supervisor's behavior to a member of the Human Resources staff or the Aptiv DRIVE line.

C. Supervisors Have Special Responsibilities

If you are a supervisor or manager, you have a special responsibility to ensure a harassment-free work environment. You are required to take immediate action if you witness harassment or if an employee informs you about alleged harassment, even if the involved employee does not report to you. Report the allegation or incident immediately to a member of the Human Resources staff.

Supervisors who violate our Aptiv's harassment policy---or who fail to act---will be disciplined up to, and including, termination of employment. Retaliation against an employee who reports harassment or participates in an investigation is prohibited.

Question and Answer

Q: I'm a supervisor. What can I do to help in this area?

A: Supervisors can follow these steps to eliminate sexual harassment and prevent it in the future:

1. Know and follow Aptiv's Anti-Harassment Policy
2. Be a role model for your staff
3. Be aware of the work environment -- identify potential problems and address them promptly
4. Create an open door policy where people feel comfortable confiding in you
5. Maintain confidentiality to the extent possible
6. Take immediate action on all complaints, even if the complaining employee asks you not to

D. How to Report Harassment

If you experience any inappropriate behavior or any form of harassment in the workplace you should immediately speak to your supervisor, a member of the Human Resources staff, or the Aptiv DRIVE Line.

If a coworker raises a concern with you regarding inappropriate behavior or material in the workplace, you should take the concern or complaint seriously, listen to the coworker, and then immediately speak to your supervisor, a member of the Human Resources staff, or contact the Aptiv DRIVE Line.

Everyone should feel comfortable about reporting improper behavior. This will help to ensure that harassment will be dealt with properly, resulting in a harassment free workplace for all Aptiv employees. If you are hesitant to talk to your manager or supervisor, you can contact

another member of management, Human Resources, or the Aptiv DRIVE Line. There are many channels you can use to speak up -- but be sure to speak up!

E. Harassment Investigations

Aptiv handles concerns as respectfully and confidentially as possible and those who report misconduct in good faith are protected from retaliation.

We will conduct a full, prompt, and fair investigation of all harassment complaints. The alleged harasser will not have any direct or indirect control over the investigation. Before completing our investigation we will take steps to make sure that any harassment does not continue.

All employees have a responsibility to cooperate fully with any investigation of a sexual harassment complaint. Investigations will vary from case to case, depending on a variety of circumstances.

While not every investigation will follow the same format, please keep the following in mind if you are involved in a harassment investigation:

- 1. Keep It Confidential.** First, whether you are the accused employee, the person making a report of harassment, or a potential witness, know that confidentiality is crucial. In the typical situation, Aptiv will keep the information it gathers as confidential as possible, consistent with all applicable laws. Both the accused and the complainant will have a chance to present their sides of the story.
- 2. Don't be Afraid to Cooperate.** There can be no retaliation against anyone for complaining about harassment, for helping someone else make a complaint, or for providing information regarding a complaint. We will protect employees who participate in investigations in good faith.
- 3. Answer All Questions Completely and Honestly.**

Question and Answer

Q. What does it mean for an employee to act in "good faith"?

A: In general terms, an employee is acting in good faith if he or she honestly reports his or her understanding of the facts for the purpose of ensuring that Aptiv's Anti-Harassment Policy is upheld in the workplace.

If it turns out that the employee's information is incorrect, or if his or her objections are determined to be unwarranted, that does not necessarily mean his or her complaint was not made in good faith.

F. Non-Retaliation

Retaliation is never permitted in response to a problem or complaint. Retaliation can take many forms, including:

- Harassment or demotion
- Firing, laying off, or transferring an individual to another department
- Passing over an individual for a promotion
- Creating a hostile work environment

Do not retaliate or permit retaliation against anyone who reports harassment or cooperates in an investigation regarding possible harassment.

Individuals engaging in retaliatory conduct will be subject to disciplinary action, which may include termination. If you suspect that you or someone you know has experienced some form of retaliation for raising a compliance or ethics related issue, immediately contact the Aptiv DRIVE Line or Aptiv's Regional or Chief Compliance Officer.