

Anti-Harassment Policy

1. Summary

Aptiv strives to create an inclusive environment free of discrimination and harassment. Every employee has the right to be treated with dignity and respect and to work in an environment free of discrimination and harassment.

2. Why Do We Need This Policy?

At Aptiv, each of us is responsible for promoting a culture that results in a safe, positive, diverse and inclusive work environment where people can flourish. The purpose of this Policy is to create and maintain a safe work environment where our employees are treated with dignity and respect and free from all forms of harassment.

3. Who Must Follow This Policy?

This Policy applies globally, to all Aptiv employees and those acting on Aptiv's behalf. Each of us has a responsibility to make sure that our practices are ethical, reasonable and consistent with the law and this Policy.

4. 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 and those acting on behalf of Aptiv, regardless of job category or level. Each of us should behave in a manner consistent with our ethical principles as well as Aptiv's values and policies, and work to create a workplace that promotes personal fulfillment and satisfaction.

Aptiv prohibits harassment of any kind. Harassment is a form of discrimination and includes any inappropriate conduct that creates a disrespectful, intimidating, hostile, or offensive workplace environment and is based on a protected category such as race, ethnicity, religion, color, national origin, gender, age, union activities, disability, genetic information, pregnancy, marital status, veterans status, sexual orientation, gender identity or any other status protected by the laws or regulations of your particular jurisdiction.

Examples of harassment include:

- Derogatory or insensitive jokes, pranks, images or comments (orally or in writing, including by e-mail, text, chat or social media)
- Racial slurs, derogatory remarks about a person's accent, display of racially offensive symbols
- Ridiculing or demeaning comments
- Innuendos or veiled threats

- Unwillingness to train, evaluate, assist or work with an employee
- Physical assault or stalking
- Intimidating acts, such as bullying or threatening
- Any other conduct that shows hostility toward, disrespect for or mistreatment of an individual based on a protected category

This list of examples is not exhaustive, and there may be other behaviors that constitute harassment.

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

Keep in mind that harassment does not always involve supervisors and subordinates. Anyone whose behavior impacts the ability of others to do their jobs by creating a hostile work environment can be a harasser – whether that person is a supervisor, coworker, or even a non-employee, such as a vendor or contractor. In addition, the victim does not have to be the individual who is the target of the harassment – it can be anyone affected by the conduct can be a victim.

B. Sexual Harassment Has No Place at Aptiv

There are two types of sexual harassment. Quid Pro Quo (Latin for “this for that”) sexual harassment occurs when someone in a position of authority (such as a manager or supervisor) makes express or implied demands for sexual favors from a subordinate in exchange for some form of job benefit, such as a raise or a promotion, or to avoid some sort of detriment such as termination or demotion.

Hostile environment sexual harassment, on the other hand, is harassment that has the effect of interfering with the victim’s work performance or creating a work environment that a reasonable person would consider intimidating, hostile or abusive.

Examples of hostile environment sexual harassment include:

- Unwelcome sexual advances
- Discussing sexual activities
- Unwelcome touching
- Making or using inappropriate or 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 sexual terms

This list of examples is not exhaustive, and there may be other behaviors that constitute sexual harassment.

Sexual harassment can occur in subtle and obvious behaviors and may involve individuals of the same or different gender.

Keep in mind that behavior that one employee may regard as “harmless” or “fun” may be offensive to another employee. The best course of action is for employees to avoid all sexual comments, behavior, and materials at work.

Sexual harassment of any kind 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.

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. Immediately report any allegations or incidents (see Section 5. Policy Violations / Questions Regarding Policy).

Supervisors who violate this Policy – or who fail to act – will be disciplined up to, and including, termination.

D. Retaliation

Retaliation against any employee who engages in protected activity is prohibited. Protected activity includes making a good faith complaint of harassment or discrimination, opposing such behavior or participating in an investigation of a complaint of such behavior. 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
- Or any other adverse action that would discourage a reasonable person from reporting perceived harassment or discrimination.

Individuals engaging in retaliatory conduct will be subject to disciplinary action, up to and including 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 report it (see Section 5. Policy Violations / Questions Regarding Policy).

E. Investigations

Aptiv takes the prevention of harassment very seriously and all complaints of harassment will be promptly investigated.

Aptiv handles concerns as respectfully and confidentially as possible.

The Company will conduct a full, prompt, and fair investigation of all harassment complaints. 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 harassment complaint.

5. Policy Violations / Questions Regarding Policy

All employees should feel comfortable about reporting improper behavior. This will help to ensure that harassment is dealt with properly, resulting in a harassment free workplace for all Aptiv employees.

If you experience any inappropriate behavior or any form of harassment in the workplace you should immediately report it.

If a coworker raises a concern with you regarding inappropriate behavior or any form of harassment in the workplace, you should take the concern or complaint seriously, and encourage your coworker to report it immediately and/or report it yourself.

Employees found to have violated this policy will be subject to disciplinary action, up to and including termination.

If you suspect any potential violations of this Policy, or if you have any questions about this Policy, please contact any member of the Legal & Compliance Team or email ethicsandcompliance.feedback@aptiv.com. You can also contact the Aptiv Drive Line – our Ethics Helpline – to report your concern, and you have the option of reporting concerns anonymously. You can contact the Drive Line electronically, at <http://driveline.aptiv.com>, or via telephone. Aptiv will not tolerate any retaliation against anyone who has made a report in good faith.

6. Do We Have Any Related Policies?

Yes. For additional information, please review Aptiv's [Speak Up & Anti-Retaliation Policy](#) and [Appropriate Workplace Conduct Policy](#).

For additional Ethics and Compliance policies visit the Ethics and Compliance site at <https://spo.aptiv.com/sites/0110-EthicsAndCompliance>.

7. Frequently Asked Questions

Q1: 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?

A1: Yes. Sexual harassment occurs not only when a hostile work environment is created through sexually-oriented comments or images, but also when employment decisions, such as promotions are based on an employee's willingness to have a romantic relationship or grant sexual favors. This is considered "quid pro quo" harassment and it should be reported immediately.

Q2: My supervisor makes inappropriate sexual comments and gestures to my co-worker who sits next to me. He doesn't make comments to me, but it is affecting my ability to do my job and makes me not want to come to work. Should I report the issue even if the harassment isn't directed at me?

A2: Yes. The victim of sexual harassment does not have to be the person being harassed – it can be anyone affected by the offensive conduct.

Q3: I'm a supervisor. What can I do to help in this area?

A3: 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

Take immediate action on all complaints, even if the complaining employee asks you not to.

Q4. What does it mean for an employee to act in "good faith"?

A4: In general terms, employees are acting in good faith if they honestly report their 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 an employee's information is incorrect or complaint is not substantiated, that does not necessarily mean that the employee was not acting in good faith.