

Anti-Retaliation Policy

1. Policy Summary

Aptiv strictly prohibits any form of retaliation against anyone who makes a complaint, raises a concern, or provides information in good faith regarding any actual or potential violation of Aptiv's Code of Ethical Business Conduct or policies, or applicable laws, rules or regulations.

2. Why Do We Have this Policy?

Aptiv encourages its employees and other stakeholders to report concerns regarding legal and ethical issues. Identifying such issues promptly allows Aptiv to conduct a timely investigation and minimize any potential impact by addressing and mitigating concerns.

This policy is designed to ensure that all employees feel comfortable speaking up when they see or suspect illegal or unethical conduct without fear of retaliation. It is also intended to encourage all employees to cooperate with Aptiv in the internal investigation of any matter by providing honest, truthful and complete information without fear of retaliation.

This Anti-Retaliation Policy applies to everyone at Aptiv, including all employees, senior leadership, and management.

3. What are the Key Principles of this Policy?

A. Aptiv Employees Have an Obligation to Raise Concerns

Aptiv depends on its employees to notify the company of any potential legal or ethical violations so it can take appropriate action. You are required to report any suspicion of improper or wrongful activity. Several different channels for reporting are available, which are explained in detail in the Code of Ethical Business Conduct. Reports of suspected improper or wrongful activity will be treated confidentially, and you have the option of reporting concerns anonymously.

B. All Forms of Retaliation are Strictly Prohibited

Retaliation can take many forms. No employee may be discharged, demoted, suspended, threatened, harassed, intimidated, coerced, or retaliated against in any other manner as a result of his or her making a good faith complaint or assisting in the handling or investigation of a complaint concerning a Aptiv policy, the Code of Ethical Business Conduct, or any applicable law, rule or regulation. However, employees who make a complaint or participate in an investigation or proceeding under this policy remain subject to the same standards of performance and conduct as other employees.

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

Question and Answer

Q: I thought my supervisor was failing to follow a safety rule, and reported my concern to the plant manager. It turns out that I misunderstood the rule, and the supervisor wasn't doing anything wrong. However, I think my supervisor was angry that I went to the plant manager, because a few days later I was given a more difficult job assignment. Since I wasn't terminated and didn't lose any pay, is there anything I can do?

A: Any adverse action that affects your terms and conditions of employment can constitute retaliation. You should notify a member of management about your supervisor's actions. If you don't feel comfortable notifying management, you should contact the DRIVE Line.

C. Complaints Must Be Made In Good Faith

Aptiv protects employees from retaliation even if their complaints are ultimately proven unfounded, unless the employee knowingly made a false allegation, provided false or misleading information in the course of an investigation, or otherwise acted in bad faith. Employees have an obligation to participate in good faith in any internal investigation.

D. We Take Violations Of This Policy Seriously

Aptiv takes all complaints of retaliation very seriously. All such complaints will be reviewed promptly and, where appropriate, investigated. Any Aptiv employee who retaliates against an employee or who otherwise violates this policy is subject to disciplinary action, up to and including termination of employment.