

## **Equal Employment Opportunity and Anti-Discrimination Policy**

### **1. Summary**

Aptiv values its dedicated global workforce, which is committed to excellence and fostering a collaborative culture where individual strengths drive our mutual success. We believe that different perspectives contribute to innovation and creativity, which are essential to our success. Consistent with our values of Operating with Respect and acting as One Team, Aptiv has a longstanding commitment to equal employment opportunity and non-discrimination, and we strictly prohibit discrimination and harassment, including sexual harassment, of any kind.

This Policy prohibits employment discrimination because of race, ethnicity, religion, color, national origin, gender, age, union activities, disability, genetic information, pregnancy, marital status, veterans status, sexual orientation, gender identity, gender expression or non-binary status, or any other status protected by the laws or regulations of your particular jurisdiction. It is a violation of this Policy to engage in discrimination of any kind. Employment decisions are based on merit, qualifications and business needs.

### **2. Why Do We Need This Policy?**

Every employee has the right to work in a professional environment where their knowledge, skills and abilities are the critical factors in their success. Aptiv expects its employees to deal fairly and honestly with one another, promote equal opportunity, treat everyone professionally and act without bias.

### **3. Who Must Follow This Policy?**

This Policy applies globally to all employees, applicants, contractors, interns and any other individual performing work on behalf of Aptiv.

Supervisors and managers are expected to uphold Aptiv's commitment to maintaining a respectful, inclusive workplace and ensuring compliance with equal opportunity and non-discrimination policies. Supervisors and managers are responsible for addressing employee concerns and complaints fairly and promptly, and for fostering an environment where all employees are treated with dignity and respect.

### **4. What are the Key Principles of This Policy?**

#### **A. Discrimination Has No Place at Aptiv**

Aptiv prohibits discrimination of any kind. Discrimination is the unfair denial of equal employment opportunities to all qualified individuals without regard to the terms, conditions or privileges of employment, including but not limited to, hiring, firing, promoting, disciplining, scheduling, training or deciding how to compensate that employee. Protected categories include:

- Race
- Ethnicity
- Religion or Philosophical Beliefs
- Color
- National Origin
- Citizenship status
- Sex or Sexual Orientation
- Gender or Gender Identity or Expression
- Age
- Union activities
- Disability
- Genetic Information
- Pregnancy
- Marital Status
- Veterans Status
- Any other category protected by the laws or regulations of your particular jurisdiction.

This list is non-exhaustive, and there may be other circumstances in which employees are unfairly denied equal treatment that would violate this Policy. Aptiv strictly prohibits any form of discrimination, harassment or retaliation. This includes, but is not limited to:

- Unwelcome conduct, comments, or actions based on protected characteristics.
- Verbal or physical harassment that creates an intimidating, hostile or offensive work environment.
- Retaliation against any individual who reports discrimination, harassment, or participates in an investigation.

## **B. Supervisors Have Special Responsibilities**

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

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

## **C. Retaliation**

Retaliation against any employee who engages in protected activity is prohibited. Protected activity includes making a good faith complaint of discrimination, opposing such behavior or participating in an investigation of a complaint of such behavior. Retaliation occurs when an adverse action is taken against an individual for engaging in protected activity and can take many forms, including:

- Harassment or demotion
- Firing, laying off, or transferring an individual to another department
- Passing over or delaying an individual for a promotion
- Exclusion from meetings and team outings
- Changes in work schedule or reduced hours
- Changes or removal of job responsibilities
- Creating a hostile work environment
- 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 / Speak Up).

#### **D. Investigations**

Aptiv takes the prevention of discrimination very seriously and all complaints of discrimination will be promptly investigated. 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 complaints of discrimination. Before completing our investigation, we will take steps to make sure that any discrimination does not continue. All employees have a responsibility to cooperate fully with any investigation of a discrimination complaint.

### **5. Policy Violations / Questions Regarding Policy / Speak Up**

Everyone should feel comfortable reporting improper behavior. This will help to ensure that discrimination will be dealt with properly, resulting in a discrimination-free workplace for all Aptiv employees. If you experience any inappropriate behavior or any form of discrimination in the workplace, you should immediately report it. Additionally, Employee Assistance Programs (EAP) or counseling services are available to employee who have experienced discrimination. Please contact your local human resource for more information on EAPs and counseling services.

If a coworker raises a concern with you regarding inappropriate behavior or any form of discrimination 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 GLC Team or email us at [ethicsandcompliance.feedback@aptiv.com](mailto:ethicsandcompliance.feedback@aptiv.com). You can report your concern or ask any questions through the [Aptiv Drive Line –our Ethics Helpline](#), and you can do so anonymously. You can contact the Drive Line electronically or via telephone. Aptiv will not tolerate any retaliation against anyone who has made a report in good faith. There are many channels you can use to speak up—but be sure to speak up!

## 6. Do We Have Any Related Policies?

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

## 7. Frequently Asked Questions

**Q1:** My team is currently hiring for a position, and I will be conducting the first round of interviews. While my manager and I were reviewing applications, my manager made a comment that implies younger candidates are more innovative and adaptable. I received two resumes—one from an applicant in their 50s with extensive experience and a successful track record, and another applicant in their mid 20s with less experience, but fits the stereotype of being more in touch with current trends. Should I screen out the candidate in their 50s?

**A1:** No, you should consider all qualified candidates. This could be a form of age discrimination, as the older applicant's capabilities are unfairly judged because of their age rather than their skills and experience.

**Q2:** An employee who practices a specific religion requests time off for a significant religious holiday. The supervisor responds with skepticism, saying "I'm not sure this holiday is really that important; we have deadlines to meet." Did the supervisor handle the situation appropriately?

**A2:** No, the supervisor did not handle the situation appropriately. By questioning the importance of the religious holiday and prioritizing deadlines over the employee's request, the supervisor dismissed the employee's rights and beliefs. A more appropriate approach would involve acknowledging the employee's request, discussing potential solutions and respecting the religious practices while also considering the team's needs.

**Q3:** An employee recently developed a physical disability that requires them to use a wheelchair. After returning to work post-recovery, the employee begins to notice subtle changes in how colleagues and managers interact with them. For instance, the employee is not invited to certain meetings or team outings and is not given high-profile projects. Colleagues, while polite, seem to be overly focused on the employee's disability, often making assumptions about what tasks might be "too difficult" or "burdensome" for them. Some even offer unnecessary help, treating the employee differently than before. What should the employee do?

**A3:** The employee should speak up. They should reach out to another manager, to Human Resources or a member of the GLC Team or call the Aptiv Drive Line—our Ethics Helpline. It may also be helpful for the other employees to attend a training on disability inclusion, emphasizing that individuals with disabilities are fully capable of performing their roles. Additionally, the employee's supervisor should ensure that all employees are invited to meetings, team outings and high-profile projects, regardless of their physical abilities. Managers should ensure they consider employees for projects based on their qualifications, and not their disability.