

Political Participation, Interacting With Government Officials and Lobbying Policy

1. Summary

Corporate political participation is heavily regulated in every country in which we operate. Employees must understand the types of political activity that are permissible, as well as the types that are prohibited or require Aptiv approval.

All strategic or policy discussions with Government Officials on behalf of Aptiv must be approved in advance by Aptiv's Government Affairs Team who can be reached at governmentaffairs@aptiv.com.

2. Why Do We Have this Policy?

Aptiv encourages employees to be personally involved in the political process in the country in which they live, but also to be aware of the specific and numerous laws that regulate Corporate political activities. This Policy will help guide you through the general principles regarding political activities, provide you with the appropriate resources to contact if you have any questions about engaging in political activities, and present some examples of the types of political activities that are permissible and the types that are not.

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. Personal Political Activity

Employees should follow their own values in the selection of political candidates, political parties, political interests and/or political beliefs. However, employees may never represent their personal political beliefs or activities as being those of Aptiv. All political activities must occur on employees' personal time and with their personal resources. For example, employees should never:

- Use corporate letterhead or stationery to support a candidate,
- Volunteer for a campaign fundraiser during scheduled work time, or
- Campaign for a political candidate or interest while on company property.

Remember this basic guideline: Never participate in any political activity that might create the impression that Aptiv is also involved in that activity.

B. Corporate Political Activity

Aptiv itself does not make any direct or indirect contributions or support political candidates or parties anywhere in the world, even where it is legal to do so. Aptiv policy prohibits corporate contributions such as:

- buying tickets for a political fundraising event,
- providing goods or services,
- assigning Aptiv personnel for fundraising activities during working hours, and
- paying for advertisements or other campaign expenses.

C. Aptiv Political Action Committee

Although there are broad restrictions on corporate political activity, U.S. law does allow associations, corporations, labor unions and issue-oriented groups to form Political Action Committees (PACs) to support political activity.

Aptiv has a PAC, to which employees may contribute funds. The Aptiv PAC may use such funds for contributions and expenditures in connection with certain political or legislative campaigns without violating U.S. law. Aptiv itself may not contribute directly to the PAC, but it can fund the administrative costs of the PAC.

All employee contributions to the Aptiv PAC are completely voluntary. Employees will not be favored or disfavored based on their decision to contribute or not to the PAC. More information about Aptiv PAC is available by contacting the Aptiv Government Affairs Team.

D. Strategic Discussions with Government Officials Must Be Pre-Cleared by Aptiv's Government Affairs Team

All activities that seek to engage Government Officials in policy or strategy, as opposed to operational activities, such as requesting permits or discussing government audits, must be pre-cleared by Aptiv's Government Affairs Team. A "Government Official" includes, for example, any officer or employee of a government department or agency or any person acting in an official capacity for or on their behalf.

E. Lobbying Coordinated by Aptiv's Government Affairs Team

Lobbying involves interacting with Government Officials in an attempt to impact legislation or regulatory activity. Lobbying is a part of our business at Aptiv, and we follow the rules carefully. Lobbying requires disclosure and reporting of any lobbying activities, is subject to specific rules, and covers many kinds of activities. You may be engaged in lobbying if your work involves:

- contact with legislators or regulators or their staffs,
- government contract sales, or
- efforts to influence legislative or administrative action.

Lobbying practices vary around the world and are often highly regulated. We must comply with all lobbying laws and regulations, worldwide. In addition, uncoordinated or unauthorized contacts with officials regarding public policy (e.g., legislative and regulatory matters) can have unanticipated negative results that jeopardize carefully developed Company strategies and/or can result in violations of law or regulation.

All lobbying activity must be coordinated through the Aptiv Government Affairs Team. You should never have discussions about legislation, regulatory activity or policy development with a Government Official unless you have received pre-approval from the Government Affairs Team. Even if you believe your job requires you to engage with a Government Official, you should be sure to contact the Government Affairs Team first.

Aptiv, and employees of Aptiv who communicate with governments concerning legislative matters, may be required by law to register as lobbyists and file reports concerning their activities. This is especially true in the U.S. In some instances, lobbying laws also apply to certain administrative matters, such as rulemaking and rate-making. Failure to comply with these requirements may result in criminal penalties. Therefore, you must discuss these activities with the Government Affairs Team to determine whether disclosure and other rules apply.

F. Gifts, Entertainment or Meals Involving Government Officials

Aptiv's Anti-Corruption, Gifts & Entertainment Policy provides guidance on how, under limited circumstances and with the pre-approval of the Global Legal and Compliance Team, employees may be able to give or receive gifts, entertainment or meals with Government Officials. For further details, please refer to the [Anti-Corruption, Gifts & Entertainment Policy](#).

5. Reporting Potential Violations / Questions Regarding Policy

Violations of applicable laws regarding lobbying or political participation can result in penalties for both Aptiv and the individuals involved. In addition, failure to adhere to this Policy may result in disciplinary action up to, and including, termination of employment.

If you suspect any potential violations of this Policy, or if you have any questions, please contact the Government Affairs Team at governmentaffairs@aptiv.com or any member of the GLC Team or email us at 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.

6. Do We Have Any Related Policies?

Yes. For additional information, please review the [Anti-Corruption, Gifts and Entertainment Policy](#) and [Speak Up and Anti-Retaliation Policy](#).

7. Frequently Asked Questions

Q1: Would it be acceptable to send an email supporting a candidate from my company email account, as long as I do the work at home during non-scheduled work time?

A1: No, this would not be acceptable. Any time you participate in any sort of individual political activity, you must do so on your own time and you may not use company resources to do so. In this case, your company email account is considered a company resource.

Q2: Can the Company contribute to labor organizations or veterans' organizations? Do these groups count as political parties?

A2: These types of contributions may be permissible in certain circumstances, but only when contributions are made to benefit the community at large, not members of the organizations. As it depends on the circumstance, you should always seek guidance and approval from the Government Affairs Team before proceeding with a contribution on behalf of Aptiv to this type of organization.

Q3: How can I tell if my interaction with a Government Official is strategic as opposed to operational?

A3: Purely operational interactions, such as the filing of paperwork with a Government Official or responding to an audit, will typically be brief or very focused. If you need to engage with the Government official in a prolonged discussion or multiple interactions, your activity is probably strategic. If you are not sure, contact Aptiv's Government Affairs Team.