



FREQUENTLY ASKED QUESTIONS & RULES OF PROCEDURE

The Aptiv Drive Line – Our Ethics Helpline

The Aptiv Drive Line – our Ethics Helpline – is a confidential reporting tool that you can use to raise any concerns about conduct you believe may be improper, unethical, or illegal.

Who can use The Drive Line?

Aptiv encourages its current and former employees and any current and former Aptiv stakeholders, such as agents, contractors, customers, suppliers, or any other third-parties, 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.

What type of situations should I report?

You should use the Drive Line to make Aptiv aware of any conduct that may potentially violate or create risks under our Code of Ethical Business Conduct, our policies, government regulations, product safety requirements, or the law. This includes but is not limited to:

- Workplace Harassment
- Theft
- Fraud
- Bribery, Corruption or Kickbacks
- Improperly sharing confidential information
- Inaccurate Financial Reporting
- Anticompetitive Conduct
- Human rights issues, e.g., the prohibition of forced and child labor
- Environmental issues, e.g., improper handling of waste or hazardous substances
- Concerns about Aptiv's suppliers business partners
- Any conduct you believe, in good faith, to be improper.

Reports to the Drive Line must be made in good faith. Employees have an obligation to participate in good faith in any investigation. Aptiv will not tolerate employees knowingly making reports based on false information, providing false or misleading information in the course of an investigation or otherwise acting in bad faith.

May I report using either the Internet or the telephone?

Yes. You can access the Drive Line online via computer or mobile device. You can also access the Drive Line via local toll-free telephone numbers. The Drive Line is available 24/7 (anytime, anywhere).





Are translations available?

Yes, translations are available in multiple languages, both online and via telephone.

Who handles the Drive Line reports and investigations?

Calls and online reports to the Aptiv Drive Line are handled by an independent, impartial third-party vendor (NAVEX) staffed by non-Aptiv employees.

The Aptiv Legal & Compliance Team is responsible for overseeing the assignment of Drive Line reports to the appropriate personnel to conduct a thorough and impartial investigation. Investigators will not be assigned to a case if they have a close relationship with any of the parties involved. For example, if a report alleges that local site leadership or Human Resources may be involved, then a case investigator outside of the site will be assigned.

Will the information in my report be kept confidential?

Information about Drive Line reports and investigations is kept strictly confidential. It is discussed only with those directly involved in the investigation and those with a specific need to know. There are consequences for failure to preserve confidentiality. Aptiv complies with applicable data privacy laws and regulations.

Am I permitted to report anonymously?

It is your choice whether to report using your name or to remain anonymous. You will be asked to provide enough detail so your report can be fully investigated. No one can or will pressure you to reveal your identity.

Am I protected from retaliation if I make a report to the Drive Line or serve as a witness in an investigation?

Aptiv's Speak-Up and Anti-Retaliation Policy strictly prohibits retaliation. We are committed to maintaining a culture in which everyone feels free to share concerns and speak up without fear of retaliation. No reporter can be discharged, demoted, suspended, threatened, harassed, intimidated, coerced, or retaliated against in any other manner because of making a good faith complaint or assisting in the handling of an investigation.

This Policy also applies to Aptiv's suppliers, as specified in Aptiv's Supplier Code of Conduct. Aptiv will not tolerate any form of retaliation against anyone or any Supplier who makes a complaint, raises a concern, or provides information in good faith about actual or potential misconduct.

If you feel that you have been retaliated, please report this via the Aptiv Drive Line or any other reporting channel.





Is the Drive Line the only way to report a concern?

Staying silent when you know there is a potential problem is never the right choice; if you are unsure, just ask. There are additional reporting channels available for Aptiv employees, which include raising any questions or concerns directly with your manager or supervisor, local leadership, Human Resources, or the Global Legal & Compliance Team. Third-parties can also raise concerns through additional channels, such as their Aptiv contact (i.e., an Aptiv Buyer or any member of the Supply Chain Management Team) or any member of the Global Legal & Compliance Team, which can be reached via email at <u>ethicsandcompliance.feedback@aptiv.com</u>.

Investigations Process

Receipt of Report

Once you have submitted a report through the Aptiv Drive Line or through any other channels, the Aptiv Legal & Compliance Department reviews the report and confirms receipt. Reports received through the Drive Line receive immediate confirmation. The reporter is provided with a report number, a key, and password to access their report.

Review of Report Information

The Legal & Compliance Team reviews the information and verifies that the report contains sufficient information to proceed with the case assignment and investigation. Once the Legal & Compliance Team obtains enough information, the case will be assigned to an investigator within the appropriate department within Aptiv, according to the subject matter of the report, to handle the case and commence an investigation.

Case Assignment to Investigator

The Legal & Compliance Team is responsible for overseeing the assignment of Drive Line reports to the appropriate personnel to conduct a thorough, independent and impartial investigation. Drive Line case investigators have been trained on investigations guidelines, best practices and using the EthicsPoint tool. When handling and investigating the case, the case investigator responsible is bound by Aptiv's policies, procedures, investigations training and the law.

Obtaining Additional Information for Investigation

When possible, the case investigator will contact the reporter to obtain additional details. Contact can be made directly with the reporter if they provide contact information. Reporters who have submitted a Drive Line report anonymously can be contacted through the Drive Line tool, EthicsPoint. Reporters can remain anonymous throughout the investigation's lifecycle and after its conclusion.

If the reporter provides additional information, or if there is sufficient information to proceed, the case investigator will conduct a thorough investigation. If, however, the reporter does not reply to the request





for additional information after repeated attempts by the case investigator, the case will be closed, and the reporter will be informed of the case closure.

Action for Substantiated Reports

Appropriate action will be taken for substantiated reports. The issues identified will be remediated by the appropriate department, escalated, and communicated to management and any other stakeholders as applicable.

Case Closure

Reporters will be informed once the case is closed. If possible and appropriate, the reporter will be asked to provide input on appropriate action and feedback regarding the action implemented.

Questions

For any additional questions, please contact the Aptiv Legal & Compliance Team at <u>ethicsandcompliance.feedback@aptiv.com.</u>