

Speak Up & Anti-Retaliation Policy

1. Policy Summary

At Aptiv, we are counting on you to speak up if something does not seem right or you think that something might violate our Code of Ethical Business Conduct, our policies, or the law. We are committed to maintaining a culture where everyone feels free to share concerns and speak up without the fear of retaliation.

Aptiv will not tolerate any form of retaliation against anyone who makes a complaint, raises a concern, or provides information in good faith about actual or potential misconduct.

2. Why Do We Have this Policy?

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.

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

This Policy applies to everyone who works or has worked at Aptiv as well as to stakeholders who interact or have interacted with Aptiv.

3. What are the Key Principles of this Policy?

A. Your Obligation to Speak Up and Raise Any Concerns

Aptiv is counting on you to notify the company of any potential legal or ethical violations so we can take appropriate action. You are required to report any suspicion of improper or wrongful activity, including but not limited to any concerns you have about misconduct or unethical behavior in the following areas:

- Fraud
- Theft
- Corruption or bribery
- Inaccurate financial reporting
- Workplace harassment
- Product safety and compliance

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

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

- Anticompetitive conduct
- Environmental, health, or employee safety
- Privacy or data protection or the security of network and information systems
- Any other potential or actual violations of Aptiv's Code of Ethical Business Conduct, policies, or the law

Several different channels for reporting are available, which are explained in detail below and in Aptiv's 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. How to Speak Up

Our Speak Up & Anti-Retaliation Policy allows you to raise any concerns through a variety of channels, via email, telephone, or an in-person meeting. As a general guideline, the first person to approach when raising a concern is your supervisor. If you would prefer, please feel free to raise questions or concerns to your local leadership, your HR contact, or any member of the Legal & Compliance Team. You can also email the Compliance Team at ethicsandcompliance.feedback@aptiv.com.

If you are uncomfortable reporting through any one of those channels, you can contact Aptiv's compliance hotline, the Aptiv Drive Line, 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, using any of the phone numbers listed on the last page of this Policy.

C. All Forms of Retaliation are Strictly Prohibited

Retaliation can take many forms. No reporter 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 an Aptiv policy, the Code of Ethical Business Conduct, or any applicable law, rule or regulation. However, reporters 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.

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, any member of the Legal & Compliance Team or the Compliance Team (email: ethicsandcompliance.feedback@aptiv.com).

D. Complaints Must Be Made In Good Faith

Aptiv protects reporters from retaliation even if their complaints are ultimately proven unfounded, unless the reporter 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.

E. 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 a reporter or who otherwise violates this policy is subject to disciplinary action, up to and including termination of employment.

4. Do We Have Any Related Policies?

Yes. For additional information, please review Aptiv's Anti-Harassment Policy, Fair Competition Policy, and Non-Discrimination, Diversity and Workforce Labor Policy.

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

DRIVE LINE TELEPHONE NUMBERS

<p>• APTIV • THE RIGHT THING THE RIGHT WAY</p>		
Country		Drive Line Number
Australia	Australia	1800 819 282
Austria	Österreich	0800 002113
Belgium	Belgien	0800 12 596
Brazil	Brasil	0800 729 2256
Canada	Canada	833-942-0972
China	中國	400 120 1877
Czech Republic	Ceská Republika	800 701 041
France	France	0 805 11 96 64
Germany	Deutschland	0800 182 0283
Honduras	Honduras	2217-0414
Hungary	Magyarország	06 80 088 052
India	भारत	00080005 03544
Indonesia	Indonesia	(021) 50996973
Ireland	Ireland	1800 335 511
Italy	Italia	800 725 992
Japan	日本	0800-300-3365
Korea, Republic of South	대한민국	080-880-0445
Macedonia	Македонија	0800 8 05 31
Malaysia	Malaysia	1800816138
Mexico	Méjico	800 077 0786
Morocco	Morocco	0530-456052
Netherlands	Nederland	0800 0222196
New Zealand (not on website)	New Zealand	0800 450 310
Poland	Polska	00 800 005 282
Portugal	Portugal	800 815 006
Romania	Roménia	0800 890 512
Russia	Россия	8 (800) 707-29-64
Serbia	Србија	0800 800684
Singapore	Singapore	800 492 2561
Slovak Republic	Slovensko	0800 002 656
South Africa	South Africa	080 098 3099
Spain	España	900 751 014
Sweden	Sverige	020-043 95 38
Thailand	ไทย	1800 014 754
Tunisia	تونس	31 365 967
Turkey	Türkiye	00800 492408 80035
Ukraine	Україна	0800 801 489
United Kingdom & Northern Ireland	United Kingdom	0800 066 8691
United States	United States	833-942-0916

The Aptiv Drive Line – Our Ethics Helpline

- ✓ Easy to use & available 24/7
- ✓ Reports received by impartial third party
- ✓ Anonymous reporting option
- ✓ Reports handled confidentially
- ✓ Reporters protected against retaliation