



PROTECTION OF WHISTLEBLOWERS AND REPORTED PERSONS

The current **Procedure** aims at ensuring **confidentiality** and respecting the rights of the Whistleblower and the Person Reported or Accused.

You cannot under any circumstances be subject to retaliation, reprimands or pressure of any kind whatsoever for submitting an Alert in good faith, even if the facts later prove to be incorrect or do not result in any form of action. **Any person responsible for retaliation shall be subject to disciplinary measures.**

Conversely, an Alert submitted in bad faith, with the intent to harm or damage the reputation of the Person Reported, may expose the Whistleblower to disciplinary measures or even prosecution, depending upon the applicable legislations.

Whistleblower's and Reported Person's identification information are treated confidentially and will be disclosed to the Designated Contacts or in accordance with the law.

Confidentiality measures will be more effective where Whistleblowers will:

- **Use the Whistleblowing System** to submit an Alert or any information relating to an Alert,
- **Be particularly vigilant** about the way you communicate,
- **Specify that you are submitting an Alert.**

ALERT LINE - INTERNATIONAL TOLL-FREE NUMBERS

Argentina	0800 6662603	Latvia	8000 26 70
Australia	1800 121 889	Lithuania	8800 30 444
Austria	0800 281700	Luxembourg	8002 4450
Bahrain	80004475	Malaysia	1800 807055
Bangladesh	157001	Malta	800 62404
Belgium	0800 71025	Mexico	01800 123 0193
Brazil	0800 891 8807	Netherlands	0800 022 9026
Bulgaria	00800 110 44 74	New Zealand	0800 443 816
Canada	1888 268 5816	Norway	800 14870
Chile	123 002 004 12	Pakistan	00800900 44181
China Netcom (North)	00800 3838 3000	Peru	080053611
China Telecom (South)	10800 441 0078	Philippines	1800 1442 0076
Croatia	0 800 222 845	Poland	00800 441 2392
Columbia	01800-944 4796	Portugal	800 880 374
Costa Rica	08000440101	Puerto Rico	1866 293 1804
Cuba	2935	Romania	08008 94440
Cyprus	800 95207	Russia	810 800 2058 2044
Czech Republic	800 142 428	Saudi Arabia	800 844 0172
Denmark	8088 4368	Singapore	800 4411 140
Egypt	0800 000 00 23	Slovakia	0800 004461
Eire (Ireland)	1800 567 014	Slovenia	0800 80886
Estonia	800 00 44 265	South Africa	0800 990520
Finland	0800 116773	Spain	900 944401 011 244 5413 (from Colombo omit 11)
France	0800 900240	Sri Lanka	0200 285415
Germany	0800 182 3246	Sweden	0800 563823
Greece	00800 441 31422	Switzerland	0080 10 44202
Hawaii	1866 293 2604	Taiwan	001 800 442 078
Hong Kong	800 930770	Thailand	0080044632066
Hungary	06800 14863	Turkey	0800 374199
Iceland	800 82 79	United Kingdom	8000 44 138 73
India	000 800 440 1286	UAE	1877 533 5310
Indonesia	001803 04411201	USA	0800 100 3199
Israel	1809446487	Venezuela	120 11527
Italy	800 783776	Vietnam	
Japan	00531 78 0023		
Korea (South)	00308 442 0074		

WHISTLEBLOWING PROCEDURE



In addition to the possibilities offered by Valeo to report conducts or practices that appear to be contrary to current regulations or its Code of Ethics, Business Partners Code of Conduct and/or its compliance policies and procedures, Valeo has set up a **Whistleblowing System** which consists of:

- ▶ The Alert Line,
- ▶ Designated Contacts appointed by Valeo,
- ▶ Direct or Indirect line managers.

This System enables the Whistleblower to submit an Alert that will be treated as confidential.

The current document describes the procedure to follow in order to submit your Alert through the Whistleblowing System.

THE WHISTLEBLOWER

A **Whistleblower** refers to any person permitted by Law to submit an Alert to Valeo using the Whistleblowing System.

It may be:

- ▶ A Valeo employee,
- ▶ A contractor,
- ▶ A casual worker,
- ▶ A third party authorized by law.

THE ALERT

An **Alert means the reporting of:**

- ▶ Suspected or proven acts of corruption or influence peddling or suspected/proven breaches of the Valeo Anti-Corruption Policy or program,
- ▶ Acts of corruption or influence peddling,
- ▶ Suspected or proven acts likely to constitute:
 - A crime or an offence,
 - A serious and obvious breach of an international agreement that has been duly ratified or approved by France, or of a unilateral decision of an international body based on such an agreement, or of a law or regulation,
 - A serious threat or harm to the public interest,
 - Anti-competitive practices.

- ▶ The existence of the risk, or the actual occurrence of serious infringements of human rights and fundamental freedoms, and harm to the health and safety of individuals as well as the environment.

THE WHISTLEBLOWING SYSTEM

To report a conduct or practice that is believed to be contrary to the law or to one of Valeo's procedures or policies, you can submit a confidential Alert through the Whistleblowing System which includes:

- ▶ The **Alert Line**, a system made available by Valeo through a service provider. You can submit your Alert and the supporting documents as follows:
 - **Verbally:** A toll-free number may be used to call an operator and be connected to a contact person who speaks your language. The list of international toll-free numbers is available at the end of this document. Otherwise, the following number, charged at standard rates, may be called from anywhere **+44 1249 661 808**.
 - **In writing:** A website made available free of charge allows you to complete a predefined questionnaire and place a detailed and documented Alert, properly described in your preferred language. You can upload supporting documents via the portal available here: www.expolink.co.uk/valeo.
 - **By e-mail:** valeo@expolink.co.uk.
 - ▶ The **Designated Contacts**, appointed by the Group to receive, analyze and process the Alerts that are submitted to them, directly or via the Alert Line or a manager. The **2 Designated Contacts** are :
 - ▶ The Group Chief Ethics & Compliance Officer
 - ▶ The Group Internal Audit & Internal Control Director
- You can contact any of them as follows:
- **By phone** at **+33 1 40 55 20 20**,
 - **By post** to the following address: 43 Rue Bayen 75017 Paris.
- ▶ Your **direct or indirect manager or your usual point of contact**, to whom you can turn.

SUBMITTING AN ALERT

Whatever means you chose to use to submit an Alert, you must:

- Mention if you are a Valeo employee, a contractor or a casual worker,
- **Specify that you are submitting an Alert** as defined in the current Procedure, particularly in case of direct communication, either verbal or written,
- Describe the facts that are directly linked to the Alert, in a precise, objective, pertinent and factual manner,
- Submit any supporting documents by e-mail or, if you wish to remain anonymous, by uploading them to the Alert Line website. These documents are considered as confidential.

If you need advice, please contact your Compliance Champion, the Legal Department or the Chief Ethics and Compliance Officer.

NB - Under several legal regimes, Whistleblowers are advised to identify themselves.