



SPEAK

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WHISTLEBLOWING
PROCEDURE



AT VALEO WE ARE SERIOUS ABOUT PREVENTING ISSUES, MANAGING RISKS AND REDUCING OUR EXPOSURE TO NON-COMPLIANCE WITH LAWS AND REGULATIONS.

WE ENCOURAGE OUR INTERNAL AND EXTERNAL STAKEHOLDERS TO HELP US PREVENT AND DETECT ISSUES BY SPEAKING UP WHEN THEY WITNESS OR SUSPECT AN ACTIVITY IN VIOLATION OF OUR ETHICS & COMPLIANCE PROGRAMS OR THE LAWS.

THE VALEO WHISTLEBLOWING SYSTEM DESCRIBED BELOW OFFERS WHISTLEBLOWERS VARIOUS AVENUES TO PLACE AN ALERT.

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 authorised as per laws and regulations.

ALERT

An **ALERT MEANS THE REPORTING OF:**

- ➡ Suspected or proven acts of corruption or influence peddling, Antitrust practices, Export Control and Economic Sanction, and Data protection regulations, such as a 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.
- ➡ Suspected/proven breaches of the Valeo Code of Ethics and Business Partner Code of Conduct, and of any Valeo Compliance Programs.
- ➡ 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.

WHISTLEBLOWING SYSTEM

The Valeo **WHISTLEBLOWING SYSTEM** encompasses the following options:

1/ THE ALERT SYSTEM

The **Alert System** is a dedicated and secured platform, available 24/7, free of charge that allows you to place a detailed, confidential and documented Alert by completing, in your preferred language, a predefined questionnaire. The System is made available by Valeo through a European service provider based in Europe:



<https://valeo.whistleblownetwork.net/>

2/ TWO DESIGNATED CONTACTS APPOINTED BY VALEO

The **Designated Contacts** are appointed by the Group to receive, analyze and process the Alerts that are submitted to them, directly or via the Alert System or a manager. The **2 Designated Contacts** who can be contacted by phone (at **+33 1 40 55 20 20**) or by post (43 Rue Bayen 75017 Paris) are:

- ➡ The Group Chief Ethics & Compliance Officer,
- ➡ The Group Internal Audit & Internal Control Vice-President.

3/ DIRECT OR INDIRECT VALEO EMPLOYEES' MANAGERS

Your **manager** refers to your direct report **whether hierarchical or functional**, or his/her manager.

4/ THIRD PARTY KEY CONTACT AT VALEO

Your **key contact** refers to your primary contact at Valeo.

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WHATEVER OPTIONS YOU CHOSE TO USE
TO SUBMIT AN ALERT, YOU MUST:

- ➔ Mention if you are a Valeo employee, a contractor or a casual worker,
- ➔ 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 choose options 2, 3 or 4, make sure to Specify, in your oral or written communication that you are submitting an Alert as defined in the current Procedure.

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

NB/

An alert can be anonymous, although Whistleblowers are generally advised to identify themselves.

To know more about the way Valeo protects personal data, please read the
WHISTLEBLOWING SYSTEM DATA PROTECTION NOTICE

PROTECTION OF WHISTLEBLOWERS AND REPORTED PERSONS

The current **PROCEDURE** aims at ensuring **CONFIDENTIALITY** and respecting the rights of the Whistleblower, the Person Reported or Accused and interested parties.

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 they communicate about the reported facts,
- ➔ **Specify that they are submitting an Alert.**