



SPEAK



WHISTLEBLOWING POLICY

in a nutshell



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.

TO THIS END, VALEO OFFERS A SECURE AND EFFECTIVE INTERNAL WHISTLEBLOWING SYSTEM THAT COMPLIES WITH THE NUMEROUS REGULATIONS ON THE PROTECTION OF WHISTLEBLOWERS AND THE PEOPLE CONCERNED.

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:

- A suspected, real or proven act and attempts to conceal such an act, that has occurred or is very likely to occur,
- resulting from Valeo's activities, directly or indirectly, as well as from the activities of subcontractors or suppliers when they are linked to an established commercial relationship with Valeo,
- likely to characterise:
 - ✓ A crime or an offence,
 - ✓ a threat or harm to the public interest,
 - ✓ a violation of an international agreement duly ratified or approved by a country in which Valeo operates,
 - ✓ serious infringements of human rights and fundamental freedoms, and harm to human health and safety of individuals as well as to the environment,
 - ✓ a breach of European Union law under Art. 2 of the European directive on the protection of persons who report breaches of Union law (hereinafter the EU Directive on whistleblowers) and any subsequent local Whistleblower protection legislation,
 - ✓ a violation of Valeo's Code of Business Ethics and/or Valeo's Business Partner Code of Conduct and/or its compliance program.

INTERNAL WHISTLEBLOWING SYSTEM

The **VALEO INTERNAL WHISTLEBLOWING SYSTEM** encompasses the following elements:

1/ THE PLATFORM

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

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

The Platform enables whistleblowers to place a report at the local or at the global level, as they see fit, to specifically appointed employees (Authorised persons).

2/ DESIGNATED CONTACTS APPOINTED BY VALEO AT GROUP AND AT LOCAL LEVEL

Authorised persons are designated either at Group level (**Group Authorised persons**) or at local level (**Entity Authorised persons**) to receive and/or process reports. They are chosen for their ability to perform their duties impartially, objectively and confidentially, and with sufficient authority and resources to perform their duties.

3/ EXTERNAL REPORTING CHANNELS

Alternatively and depending on local legislation, Whistleblowers may place their report with external designated authorities.

Authorised persons and external authorities are listed on the Platform (<https://valeo.whistleblownetwork.net/> - section To whom you can report)



WHATEVER THE OPTION YOU CHOSE TO PLACE AN ALERT ON THE VALEO PLATFORM, YOU MUST:

- Use only one internal reporting channel and give preference to the Group reporting channel for Alerts of an urgent or significant nature,
- Specify in what capacity you are acting (a Valeo employee, a contractor, a casual worker, a business partner's employee...),
- Describe the facts that are directly linked to the Alert, in a precise, objective, pertinent and factual manner,
- Upload supporting documents on the Platform. These documents are considered as confidential,
- Create a secure Inbox in order to communicate with the Authorised persons and investigators in a secure, confidential and even anonymous way if this is your preference.

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

NB/

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

PROTECTION OF WHISTLEBLOWERS AND REPORTED PERSONS

The **POLICY** describes the **CONFIDENTIALITY** and **PROTECTION** measures applicable to Whistleblowers, Reported persons and other Third parties mentioned.

Their identification information is considered **highly confidential**, treated accordingly and potentially disclosed only to the relevant persons as authorised by the policy, the law or the Whistleblower.

It is strictly forbidden to retaliate, reprimand or pressurize in any way a Whistleblower 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 Reported person, may expose the Whistleblower to disciplinary measures or even prosecution, depending upon the applicable legislation.

**CONFIDENTIALITY
MEASURES WILL BE
EVEN MORE
EFFECTIVE WHERE:**

➡ Whistleblowers will use the Platform to submit a report

➡ they refrain, as far as possible, from talking about their Alert

To know more about the way Valeo protects personal data, please read the **WHISTLEBLOWING SYSTEM - PRIVACY NOTICE**