

Political Participation and Lobbying Policy

1. Policy Summary

Corporate political participation is heavily regulated in every country in which we operate. Employees must understand not only the types of political activity that are permissible, but also – just as importantly – the types that are prohibited or require Company approval.

2. Why Do We Have this Policy?

Aptiv encourages employees to be personally involved in the political process in the country in which they live, but also to be aware of the specific and numerous laws that regulate Corporate political activities. This Policy will help guide you through the general principles regarding political activities and will:

- Provide you with the appropriate resources to contact if you have any questions about engaging in political activities
- Present some examples of the types of political activities that are permissible, and the types that are not

This policy applies to everyone at Aptiv, including all employees, senior leadership and management, worldwide.

3. What are the Key Principles of this Policy?

A. Personal Political Activity

At Aptiv, we encourage all employees to follow their own values in the selection of political candidates, political parties, political interests and/or political beliefs. However, employees may never represent their personal political beliefs or activities as being those of Aptiv. All political activities must occur on an employee's personal time and with his or her personal resources. For example, employees should never:

- Use corporate letterhead or stationary to support a candidate
- Volunteer for a campaign fundraiser during scheduled work time
- Campaign for a political candidate or interest while on company property

Remember this basic guideline: Never participate in any political activity that might create the impression that Aptiv is also involved in that activity.

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

Questions and Answers

Q: Would it be acceptable to send an email supporting a candidate from my company email account, as long as I do the work at home during non-scheduled work time?

A: No, this would not be acceptable. Any time you participate in any sort of individual political activity, it not only has to be on your own time, but you also have to be sure that you are not using any company resources. In this case, your company email account is considered a company resource.

B. Corporate Political Activity

Aptiv does not make any direct or indirect contributions or support political candidates and parties anywhere in the world, even where it is legal to do so. Aptiv policy prohibits corporate contributions such as:

- Buying tickets for a political fundraising event
- Providing goods or services
- Assigning Aptiv personnel for fundraising activities during working hours
- Paying for advertisements or other campaign expenses

Aptiv Political Action Committee

Although there are broad restrictions on corporate political activity, U.S. law does allow associations, corporations, labor unions, and issue-oriented groups to form Political Action Committees (PAC). “Aptiv Political Action Committee” is among approximately 4,000 PACs registered with the Federal Election Commission.

Under certain circumstances, members of a company may contribute funds to their company’s PAC, and the company may use such funds for contributions and expenditures in connection with federal election campaigns without violating the U.S. law. Company resources may also be used on limited occasions to support the Company’s PAC.

It is essential to remember, however, that all contributions to a company’s PAC must be voluntary. Neither the Company nor any employee of the Company will ever favor or disfavor an employee based on their decision to contribute or not to contribute to the PAC.

Questions and Answers

Q: Can the Company contribute to labor organizations or veterans' organizations? Do these groups count as political parties?

A: These types of contributions may be permissible in certain circumstances, but only when contributions are made, not to benefit members of the organizations, but rather to benefit the community at large. As it depends on the circumstance, you should always seek guidance and approval from Corporate Affairs before proceeding with a contribution on behalf of Aptiv to this type of organization.

C. Lobbying

Lobbying involves interacting with government officials in an attempt to impact legislation or regulatory activity. Lobbying is a part of our business at Aptiv, and we follow the rules carefully. Lobbying requires disclosure and reporting of any lobbying activities, is subject to specific rules, and covers many kinds of activities. You may be engaged in lobbying if your work involves:

- Contact with legislators or regulators or their staffs
- Government contract sales
- Efforts to influence legislative or administrative action

Compliance With Laws No Matter Where We Do Business

Lobbying practices vary around the world and are often highly regulated. We must comply with all lobbying laws and regulations, worldwide.

Coordination Through Corporate Affairs

As a general rule, all lobbying activity must be coordinated through Corporate Affairs. You should never have discussions about legislation, regulatory activity, or policy development with a government official unless you are a registered lobbyist or have received approval from Corporate Affairs. Uncoordinated or unauthorized contacts with officials regarding public policy (e.g., legislative and regulatory matters) can have unanticipated negative results that jeopardize carefully developed Company strategies and/or can result in violations of law or regulation. If at any time you believe that your job requires you to engage with a government official, you should be sure to contact the Corporate Affairs staff.

Aptiv, and employees of Aptiv who communicate with governments concerning legislative matters, may be required by law to register as lobbyists and file reports concerning their activities. This is especially true in the U.S. In some instances, lobbying laws also apply to certain administrative matters, such as rulemaking and rate-making. Failure to comply with these requirements may result in criminal penalties. You must discuss these activities with the Company's Chief Compliance Officer, Corporate Affairs or the Legal Staff to determine whether disclosure and other rules apply.

Questions and Answers

Q: We have an extra seat at the Company table for an upcoming charity event. Can I invite a friend of mine who happens to be on a local city council?

A: You must receive approval from Corporate Affairs prior to inviting a government official to any sort of company-sponsored event.