

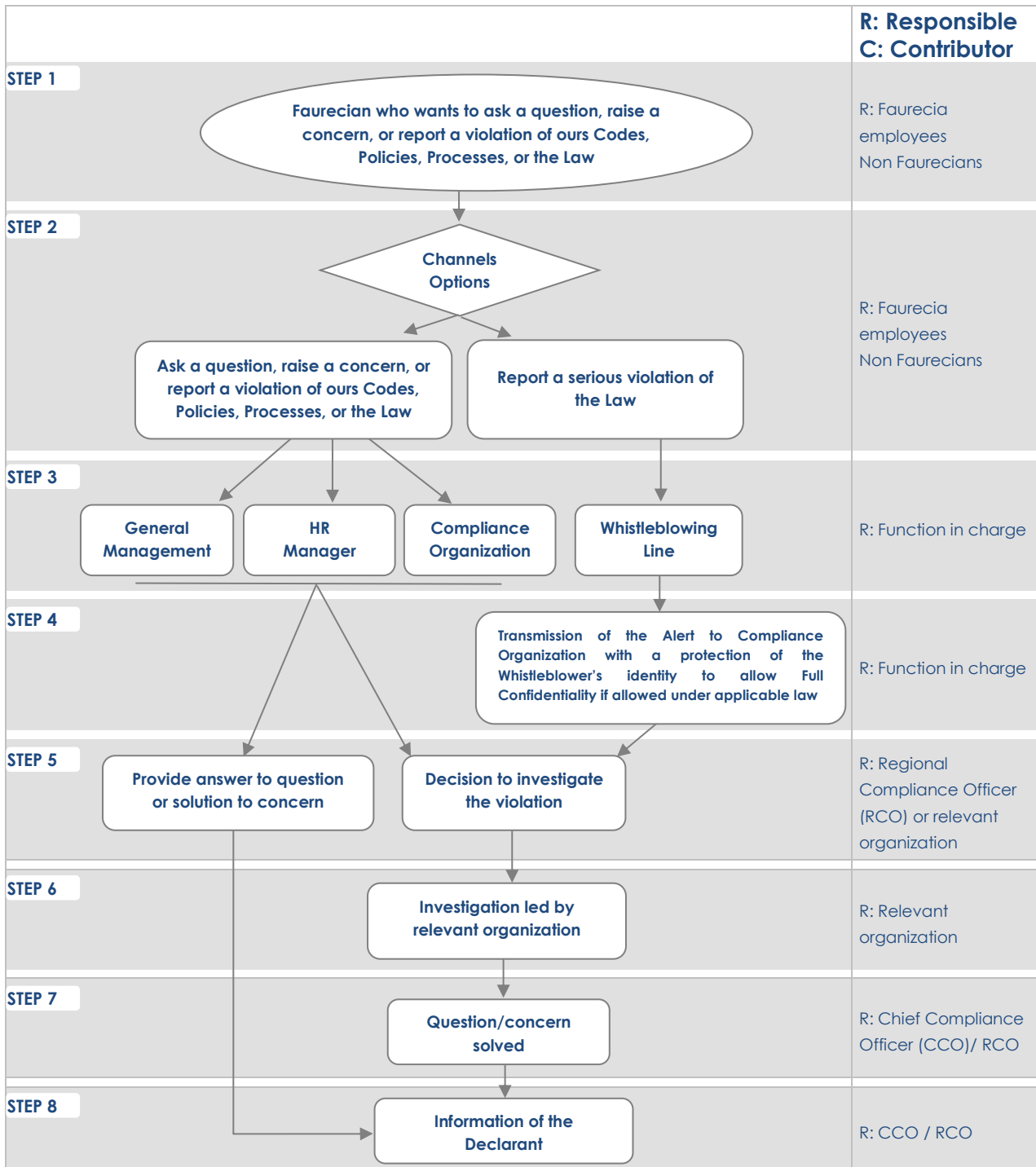


Title of the document	Speak Up
Reference	FAU-C-LSG-2402
Purpose	Encourage Faurecians and Non-Faurecians to ask questions on, raise concerns about, or report violations of our Code of Ethics or our Code of Conduct for the Prevention of Corruption, our Policies and Processes, and applicable Laws, to improve our way of working and allow full compliance
Scope	All Faurecia controlled entities
Related documents	FAU-C-LSG-2400 Code of Ethics FAU-C-LSG-2401 Code of Conduct for the Prevention of Corruption
Issue n°	01
Description of changes	N/A
Cancel and replaces	FAU-S-LSG-2599 Infringement Report Procedure Supersedes any existing internal policies on the same topic
Author	Compliance Organization
Owner	Houda DAMON, Deputy Chief Compliance Officer
Approved by	Nolwenn Delaunay, Chief Compliance Officer

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I. SPEAK UP as a PROCESS



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II. INTRODUCTION: SPEAK UP AS A CULTURE

a. Purpose of the policy

Every Faurecian is accountable for playing an active role in making our company better day after day, especially by improving the way people work and behave.

This process of continuous improvement is well known at Faurecia and has proven itself fruitful in quality and safety, for both our products and our workplace.

Likewise, we need to seek continuous improvement in the way we abide by our own rules as set in our Code of Ethics, in our Code of Conduct for the Prevention of Corruption, in our Policies and Processes, and by the law in all countries in which Faurecia operates.

As we thrive for total quality and zero defect in safety, we need to thrive for total quality and zero breach in Compliance.

To make sure Faurecia does it right, and be right the first time, our Compliance program has developed training and communication tools and is encouraging employees to ask questions, raise concerns in case of doubt, or report a violation of our Code of Ethics, our Code of Conduct for the Prevention of Corruption, our Policies and Processes, or the Law.

To go further, we need to detect earlier breaches of these rules to be able to correct them better.

Each Faurecian should feel comfortable asking questions on, raising concerns about, or reporting a violation of our Code of Ethics, our Code of Conduct for the Prevention of Corruption, our Policies and Processes, or the Law ("Speak Up").

This Policy aims at encouraging Faurecians to ensure compliance by speaking up and provides appropriate reporting procedures based on the following principles:

- Confidentiality;
- Presumption of innocence;
- Protection from retaliation, and
- Personal data protection.

b. Role of the management

Our "Being Faurecia" Culture, our Code of Ethics, our Code of Conduct for the Prevention of Corruption and our Code of Management give to every Faurecian Manager a role to play in Compliance by fostering a Speak Up Culture.

This is why Management needs to take concrete actions to encourage Speak Up within their team. Management needs to actively listen to Faurecian speaking up and to effectively address the matter, either directly or with the help of the Compliance organization or any other functions.



Protection of good faith speakers

Management is also responsible to protect the person who speaks up in good faith. A Faurecian speaking up in good faith may ask that her/his identity be kept confidential.

A Faurecian speaking up in good faith shall not be retaliated against, whatever forms it may take (being ostracized, discriminated, disciplined, or dismissed). This no-retaliation principle applies whatever channel to Speak Up was used by the Faurecian.

Management may recourse to the Compliance organization if an Investigation needs to be carried out in a confidential manner to root cause the matter and remediate it.

III. CHANNELS TO SPEAK UP

Channels 1, 2 and 3 are the standard ways of speaking up that every Faurecian is free to use. In addition to these Channels, a Faurecian may also choose to use the specific Whistleblowing Line to report Serious Violation(s) as described in subsection b.

a. Standard ways of speaking up

Channel 1: General Management

Every Faurecian, irrespective of her/his position, location, and seniority may freely ask question(s) on, raise concern(s) about, or report violation(s) of, our Code of Ethics, our Code of Conduct for the Prevention of Corruption, our Policies and Processes, or the Law, to her/his Supervisor or Management, orally or in writing, in the language that suits her/him better.

Channel 2: HR Manager

In addition, every Faurecian, irrespective of her/his position, location, and seniority may freely ask question(s) on, raise concern(s) about, or report violation(s) of, our Code of Ethics, our Code of Conduct for the Prevention of Corruption, our Policies and Processes, or the Law, to the HR Manager, orally or in writing, in the language that suits her/him better.

Channel 3: Compliance Organization

In all cases, every Faurecian, irrespective of her/his position, location, and seniority may freely ask question(s) on, raise concern(s) about, or report violation(s) of, our Code of Ethics, our Code of Conduct for the Prevention of Corruption, our Policies and Processes, or the Law, to the Compliance Organization, at Division level (Compliance Leader); Regional level (Regional Compliance Officer) or Corporate level (Chief Compliance Officer or Deputy Chief Compliance Officer); orally or in writing, in the language that suits her/him better.

b. Specific Whistleblowing Line (Faurecia EthicsPoint)



It may be difficult sometimes to report a violation if such a violation may expose to disciplinary or legal sanctions, peers, colleagues, or people we like. Conversely, sometimes we could fear retaliation by peers, colleagues, or people who would not understand why we reported a violation.

Not only Faurecians but also Non-Faurecians, irrespective of their position, location, and type of relationship with Faurecia, are offered to use a specific channel, called the Whistleblowing Line, to report Serious Violation(s) of the Law as further described below. This Channel is more restrictive in terms of scope but offers extra protection through “Legal Confidentiality”.

The use of the Whistleblowing Line is not mandatory and remains complementary to other ways of reporting such as Channels 1, 2 and 3. Therefore, Faurecians and Non-Faurecians would not be sanctioned for not using the specific Whistleblowing Line.

This Channel must be used in good faith and in a disinterested manner. Moreover, the restricted scope of reporting as set forth below must be respected. Under these conditions, the person using the Whistleblowing Line is called a “Whistleblower”.

The facts as reported by a Whistleblower are considered allegations until proven by an Investigation. They constitute what is called an “Alert” and must be reported objectively.

How to place an Alert?

The Whistleblowing Line “www.Faurecia.ethicspoint.com” is a web-based application. It is managed by NAVEX Global, an independent third-party provider (the “Provider”). It can be accessed from any internet browser, 24/7/365, in a variety of languages.

The Whistleblowing Line may only be used by a Faurecian or Non-Faurecian who has “Personal Knowledge”, and who would like to report issues (“Serious Violations”) related to:

- Corruption; or
- Anti-competitive practices; or
- Violation of fundamental human rights; or
- Harassment in the workplace; or
- Accounting irregularities; or
- Breach of confidentiality; or
- Protection of environment; or
- Other serious crimes constituting a threat or serious harm to public interest.

When a Whistleblower reports an Alert, the Provider transmits the Alert to the Chief Compliance Officer and the Deputy Chief Compliance Officer. They can decide to assign the Investigation of the Alert to a Regional Compliance Officer if the Alert relates to a specific region.

To allow Faurecia to investigate the violation, the Whistleblower needs to include in its Alert as much information she/he has in its possession. Faurecia and the Provider are



allowed to process this information only according to the provisions of the Annex 1 hereto.

Communication with the Whistleblower and the person(s) object of the Alert

The Whistleblower also needs to keep in contact with Faurecia through the Provider to allow Faurecia to:

- (i) acknowledge that it received the Alert, and
- (ii) inform the Whistleblower whether an Investigation has been opened, and
- (iii) allow a dialogue with the view to prove or disprove the violation, and
- (iv) more generally, give feedback on the status of the Investigation.

In any case, Faurecia will keep the Whistleblower informed of the processing of her/his Alert in compliance with applicable laws.

Faurecia will inform the person(s) who allegedly are responsible of the violation that she/he/they are the subject(s) of an Alert. When conservatory measures are necessary, in particular to prevent the destruction of evidence or for Investigation purposes, this information may intervene after the adoption of the relevant measures, in accordance with applicable laws.

Legal Confidentiality

The identity of the Whistleblower and any identifying details are protected and kept confidential by the individuals specifically in charge of within Faurecia and the Provider. Those individuals are in limited number, specifically trained to receive and investigate those Alerts, and subject to strong confidentiality obligations.

The Whistleblower can ask the Provider for the Alert to be cleansed, i.e. her/his identity or any identifying details are removed.

If the Whistleblower consented that the Provider discloses her/his name, she/he is deemed to have consented that her/his name is disclosed to the person(s) appointed by the Chief Compliance Officer or the Deputy Chief Compliance Officer to conduct the Investigation of her/his Alert.

The Alert, its content and the Whistleblower are protected by Legal Confidentiality.

The Legal Confidentiality gives a very strong protection to the Whistleblower: its identity and any identifying details must be kept confidential and any breach thereof could be a criminal offense, in particular in France.

This Legal Confidentiality applies to the following persons ("Protected Persons"):

- (i) the identity and any identifying details of the Whistleblower even if she/he agreed that the Provider discloses it to the Chief Compliance Officer; and
- (ii) the identity and any identifying details of the person(s) alleged to be responsible or accomplice of the violation ("Target(s)").



The Legal Confidentiality may be lifted by the express consent of the Protected Persons.

The Legal Confidentiality only protects one person until the Investigation concludes that she/he was responsible for or accomplice of the violation of the law.

However, the Legal Confidentiality cannot be opposed to Police investigators.

Because the protection that is given to Whistleblowers is very strong, anonymous reports are not favored and may be discarded as deem fit by the Chief Compliance Officer or the Deputy Chief Compliance Officer.

IV. ADJUSTING THE POLICY

This policy does not disengage Faurecia from its local legal obligations wherever the Group operates. Regional Compliance Officers are responsible for adapting this Policy to the local regulations.

V. REPORTING

The Chief Compliance Officer regularly carries out an analysis of the Alerts received, which is the subject of a consolidated reporting to the Group Compliance Committee of Faurecia SE.

VI. KEY TERMS AND DEFINITIONS

Alert: The facts as reported by a Whistleblower.

Code of Conduct for the Prevention of Corruption: Internal policy with the aim of familiarizing all of the Group's managers and employees worldwide with the basic principles of the prevention of corruption, enabling them to resist attempts at corruption, protecting them, and the Group and its subsidiaries, from the risk of prison sentences, fines, and harm to reputation and integrity.

Code of Ethics: Internal document defining the rules of business conduct that must be applied by Faurecians in their day-to-day relations both internally and externally.

Code of Management: Behavioral guide describing the values managers should have toward all stakeholders and illustrates how managers should be exemplary in acting in accordance with our values through examples of behaviors in different daily situations.

Compliance Organization: The Chief Compliance Officer (CCO), the Deputy CCO, the Regional Compliance Officers (RCOs) and the Compliance Leaders.

Investigation: A formal fact finding inquiry to determine whether allegations of misconduct are substantiated.

Legal Confidentiality: Special protection that is granted by law to Whistleblowers. The Legal Confidentiality gives a very strong protection to the Whistleblower: its identity and any identifying details must be kept confidential and any breach thereof is a criminal offense.

Non-Faurecians: Faurecia's customers, suppliers, and other third parties to whom Faurecia provides goods or services / from whom Faurecia receives goods and services.



Personal Knowledge: It means that you personally witnessed what happened, as opposed to hearsay, opinion, or argument. You actually saw it or heard it or have in your possession direct evidence.

Policies and Processes: Refer to Faurecia Core Procedures (FCPs) and any related internal rules.

Protected Persons: Faurecians and Non-Faurecians covered by the Legal Confidentiality.

Provider: The independent third-party managing the Whistleblowing Line allowing Faurecians and Non-Faurecians to place Alerts (NAVEX Global).

Retaliation: The act of ostracizing, discriminating, sanctioning or dismissing against someone in revenge.

Serious Violations: Violations of Law related to Corruption, Anti-competitive practices, Violation of fundamental human rights, Harassment in the workplace, Accounting irregularities, Breach of confidentiality, Protection of the environment and other serious crimes constituting a threat or serious harm to public interest.

Speak Up: Asking questions on, raising concerns about, or reporting a violation of, our Code of Ethics, our Code of Conduct for the Prevention of Corruption, our Policies and Processes, or the Law.

Whistleblower: Faurecians and Non-Faurecians using the Whistleblowing Line in good faith and in a disinterested manner.

Whistleblowing Line: A specific channel offered to Faurecians and Non-Faurecians to report Serious Violations of the Law they have personal knowledge of.



Annex 1 – Additional details on the Whistleblowing Line

All personal data collected in the Whistleblowing Line will be managed as follows:

- i. When the Alert is outside of the scope of the Whistleblowing Line, all personal data shall be destroyed without delay.
- ii. When the Alert triggered an Investigation, all personal data shall be destroyed within 2 months after the close of the Investigation except if (iii) applies.
- iii. When the Investigation triggered disciplinary or legal proceedings, all personal data may be kept on a separate system, with restricted access, until the proceedings are over (appeals exhausted, execution over).
- iv. Any data once anonymized may be archived without restriction.
- v. The Whistleblower can ask the Provider for the Alert to be cleansed, i.e. her/his identity or any identifying details are removed. In France, anonymous Alerts are only allowed as an exception, on an occasional basis, when the seriousness of the fact has been established, the Alert is sufficiently documented and is handled with special care.
- vi. The data controller of the Whistleblowing Line is Faurecia SA.
- vii. Only the following personal data will be processed:
 1. identity, function and contact information of the Whistleblower (unless he or she wishes to remain anonymous provided it is allowed under applicable law);
 2. identity, function and contact information of the individual(s) concerned by the Alert;
 3. identity, function and contact information of the individual(s) collecting or processing the Alert;
 4. reported facts;
 5. information collected during the verification of the reported facts;
 6. written report on the operations of verifications;
 7. decisions taken further to this Alert.
- viii. Only events objectively reported (with, if possible, detail about dates, names and roles of the persons involved) in direct connection with the scope and strictly necessary to the verification of the alleged information will be taken into consideration. The description of the reported events should explain the nature of the allegations in accordance with the principle of presumption of innocence.

Rights of the data subjects

Any person identified within an Alert has a right of access to, and to require the rectification or deletion of, her/his data when such data is inaccurate or out-of-date,



pursuant to the French Data Protection Act (French law n°78-17 of 6 January 1978 as amended) or any similar applicable national legislation providing for the same or similar rights, and from the date that it enters into force, to the General Data Protection Regulation 2016/679.

Any such request for access, rectification or deletion shall be sent to the Compliance Organization, either by email to dpo@faurecia.com.

An individual identified within any Alert will under no circumstances be informed, on the basis of his right of access, of the identity of the Whistleblower.