



Policy

ALL-ETH-LEG-046

**Speaking Up & No
Retaliation Policy**

Owner

Chief Compliance Officer

Ethics & Compliance

Other Functions

**Human Resources,
Operational Excellence,
Legal**

Original Issue Date

JULY 2023

Revision Effective Date

31 JULY 2024

Policy Summary

This policy:

- Describes how maintaining a thriving speak-up culture at PHINIA cultivates a feeling of safety and shared responsibility for the ethics of the organization.
- Requires that violations of PHINIA's Code of Ethical Conduct, company policies, and the law be reported.
- Emphasizes that reporting concerns benefits our work.
- Describes our prohibition on retaliation.
- Provides examples of actions and behaviors that could be considered retaliatory.

Speaking Up & No Retaliation Policy

Purpose / Scope

At PHINIA, we conduct our business with fairness and integrity in all circumstances. By acting in this manner, we earn the trust of coworkers, customers, shareholders, suppliers, and the communities in which we live and work.

We rely on our people to act courageously to share questions and to raise issues about behavior, ethical choices, misconduct, and potential violations of laws, rules, or regulations (**Requirements**), our Code of Ethical Conduct, or our company policies. When people choose to speak up, we are better able to conduct our business in an ethical and compliant way, address concerns effectively, reduce risks associated with wrongdoing, prevent future misalignment, promote a culture of openness and transparency, and create a sense of shared ownership for the ethics of the organization.

This policy describes options for speaking up and raising questions or ethical concerns; documents our processes for reporting, investigating, and improving as a result of reports; and emphasizes PHINIA's policy against retaliation.

This policy applies to all PHINIA **Team Members** (includes all PHINIA employees, directors, officers, consultants, agents, apprentices, co-ops, and contract workers) and suppliers.

A thriving speak-up culture cultivates a feeling of safety and shared responsibility for the ethics of the organization.

Policy and Responsibilities

Reporting Requirements

Integrity goes beyond just following the Requirements. Acting with integrity means treating others with fairness, respect, transparency, and honesty. We count on each other to speak up when we feel something is wrong or even questionable. Each of us at PHINIA has a responsibility to speak up.

When we speak up, it benefits the individuals choosing to come forward with concerns and PHINIA as a whole. We protect any individual who raises concerns in good faith. This means that the person raising the concern does so sincerely, out of a belief that it is or could be true. Speaking up allows PHINIA to address and resolve issues, make meaningful changes, and apply the learnings for continuous improvement in our business. As diligent employees, compassionate colleagues, and thoughtful leaders, it is our responsibility to lend our voices to the conversation.

Even if all the facts are not available, we immediately raise potential issues about misconduct through one of the available options. The sooner we speak up, the sooner our concerns are addressed and the risks to PHINIA – and to each other – are reduced.

At PHINIA, we:

- Immediately raise concerns which:
- Involve any kind of actual or suspected misconduct including any activity that may be unethical, illegal, or inappropriate at PHINIA.
- Relate to any potential violation of Requirements.
- Communicate our concerns truthfully, providing as much detail as possible.
- Make our reports in good faith, never making false or inaccurate accusations.
- Understand that raising concerns in a timely manner allows them to be addressed sooner.
- Do not investigate reports or concerns on our own.

What Happens When Questions and Concerns Are Raised

We know that it takes courage to speak up about concerns. And, when we feel uncertain about an action or decision made at work, it can be helpful to walk through questions and concerns with a supervisor, the Compliance Office, or another PHINIA resource for support. No matter how it is conveyed, when we speak up about misconduct or a potential violation, PHINIA takes it seriously.

Any report, concern, or question raised in accordance with the Asking Questions and Reporting Concerns section below, whether local, regional, or at a corporate level, will be kept confidential to the greatest extent possible. PHINIA will address or escalate the information immediately so that it is handled by the right internal channel and designated individuals, each of whom have been informed about the need to ensure confidentiality and non-retaliation.

With our Compliance Hotline system, questions and concerns are received through a web intake form or by a person working for our third-party service provider. The Compliance Office reviews reports, conducts or manages necessary investigations, and helps implement appropriate actions while keeping matters as confidential as possible and complying with Requirements.

No matter what method is chosen to let PHINIA know about concerns, the company promptly, thoroughly, and impartially conducts investigations. When possible, the company follows up with the reporting party about status and the results of an investigation. Additionally, PHINIA considers corrective and preventative actions to address the concerns and mitigate problems in the future.

At PHINIA, we:

- Realize sharing concerns and making reports about inappropriate behavior improves PHINIA and our culture.
- Raise questions and concerns to a supervisor, site lead, functional leader or vice president, the Compliance Office, Human Resources, the Legal Department or the PHINIA Compliance Hotline.

- Know that anonymous reporting is available through the PHINIA Compliance Hotline.
- Understand appropriate actions are taken when investigations indicate further action is necessary, and that a person who reports a concern might not know, see, or hear about those actions, especially when others are involved.
- Recognize that disciplinary actions for misconduct may include dismissal.
- Refuse to retaliate against anyone for making a report in good faith or participating in an investigation, and report any signs of retaliation to the company.

Open Door Policy and No Retaliation

Bringing questions and concerns forward supports a culture that values and maintains high ethical standards. At PHINIA, we want each person to feel comfortable speaking up without fear of retaliation. We expect the entire PHINIA team to cultivate an open and transparent environment, where people feel comfortable raising questions and concerns about any activities or behaviors that might be unethical, illegal, or improper. We value the opportunity to raise questions and concerns without fear of retaliation.

Retaliation is treating someone unfairly because of their action. At PHINIA, we prohibit retaliatory behavior. Examples of conduct that might be considered retaliatory include:

- Withholding information, communication, tools, or support needed to perform a job function
- Firing or dismissing someone
- Demoting, delaying a promotion, or reducing compensation
- Requiring an undesirable assignment or work schedule
- Preventing opportunities for new assignments
- Giving an inappropriate or unwarranted performance review
- Verbal or physical abuse, including insults
- Threatening any of the above actions

Retaliation does not depend on whether a report or concern is substantiated. We do not tolerate retaliation against people who make reports in good faith or participate in investigations. If retaliation is suspected, contact the Compliance Office immediately.

Violations of this Policy

Violation of this policy by any Team Member or supplier may result in disciplinary action, up to and including termination of employment or other engagement. PHINIA may also pursue civil or criminal actions.

Asking Questions, Reporting Concerns and No Retaliation

Bring questions or concerns to:

- A supervisor, site lead, functional vice president
- Human Resources

- Compliance Office (complianceoffice@phinia.com)
- Legal Department
- PHINIA Compliance Hotline (where anonymous reporting is available, subject to local law), using the web form online or by phone
 - **Online:** compliancehotline.PHINIA.com
 - **By Phone:** There is a number for every country where we operate. Find your country's specific phone number on <http://www.convercent.com/report>.
- Audit Committee of the Board of Directors (mail directed to their attention at PHINIA Headquarters, care of the Corporate Secretary)

All concerns and questions are taken seriously, kept confidential to the greatest extent possible, and handled promptly and professionally.

PHINIA does not tolerate retaliatory behavior. A finding of retaliation may result in disciplinary action up to and including dismissal, even if the underlying report or concern was not supported.

Resources

- [Code of Ethical Conduct](#)
- Respect & Dignity Policy, ETH-LEG-010

Policy Administration

Policy Title Speaking Up & No Retaliation Policy

Policy Owner(s), Titles, & Function Chief Compliance Officer, Ethics & Compliance

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Revisions

Date	Version	Description	Approver
31 July 2024 Review due July 2026	1	Title and content update to reflect PHINIA; replaces former BorgWarner/PHINIA Compliant Submission and Handling Policy	PHINIA Strategy Board; subsequently Ethics & Compliance Committee