

CentroMotion is committed to lawful and ethical behavior in all of its activities and requires directors, officers and employees to act in accordance with applicable laws, regulations and policies and to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

CentroMotion encourages its employees and stakeholders to share their questions, concerns, suggestions, or complaints with someone who can address them properly. CentroMotion values open and honest communications and encourages employees and stakeholders to bring potential issues to the attention of their supervisor, Executive Committee member, Human Resources or the appropriate CentroMotion representative. However, whenever this is not feasible, CentroMotion provides employees and other stakeholders with other methods to communicate concerns while remaining anonymous. CentroMotion has engaged an independent company called Convercent to provide a platform to report potential issues while remaining anonymous.

This policy outlines CentroMotion’s expectations and reporting processes for employees and external stakeholders to report on suspected wrongdoing including, but not limited to: violations of business ethics, discrimination, harassment, human and labor rights, violation of law, conflicts of interest, environmental issues, financial misconduct, etc.

### Reporting Violations

Employees and stakeholders may contact Convercent confidentially via telephone or internet. Convercent service is available 24 hours a day, seven days a week.

Telephone Reporting:

<u>Country</u>	<u>Number to Dial</u>	<u>Country</u>	<u>Number to Dial</u>
Brazil (Rio)	+55.212018111	Japan	0800.170.5621
Brazil	0.800.892.2299	Korea	080 880 0476
Canada	1.800.017.6302	Mexico	800.681.6945
China	+400-120-3062	Netherlands	0.800.022.0441
Finland	0800.07.635	Spain	900-905460
France	0805.080339	Sweden	020.889.823
Germany	0800.181.2396	Turkey	+90-850-390-2109
Hungary	+36.21211440	UK	0-808-189-1053
India	000.800.100.3428	US	800-461-9330
Italy	800.727.406		

Internet Reporting:

- [www.convercent.com/report](http://www.convercent.com/report)
- [www.ethics.centromotion.com](http://www.ethics.centromotion.com)

Both sites will direct users to the same Ethics and Compliance Helpline webpage managed by Convercent. Any submission (using either the phone or internet) will receive an Access Number. The use of an access number allows employees and other stakeholders to remain anonymous during the review process.

## Review and Investigation Process

Once a report is submitted, the Chief Human Resource Officer (CHRO) will review the concern within 7 days with a goal to provide feedback and any corrective actions within 90 days. It is the CHRO's responsibility to facilitate any investigation and the appropriate corrective action. If the report is not submitted anonymously the complainant or their identified representative may be consulted during remediation/resolution process. CentroMotion may also retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation. Any HR-related concerns will be reviewed by the Chief Financial Officer (CFO). Employees or other stakeholders can either call or log onto the webpage using this Access Number to follow-up on the issue and review current status of the investigation. Additionally, during the submission process employees and stakeholders can select to be automatically notified of changes to the status of an incident or issue submitted.

## Good Faith

A person reporting concerns under this policy must act in good faith and have reasonable grounds for believing that the information reported indicates that suspected wrongdoing has occurred. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be subject to disciplinary action, up to and including termination of employment.

## Confidentiality and Non-Retaliation

Violations or suspected violations may be submitted on a confidential basis. Reports of violations or suspected violations will be kept confidential and anonymous to the extent possible, consistent with the need to conduct an adequate investigation and to adhere to any legal obligations. CentroMotion will not tolerate retaliation against any employee or stakeholder who raises a concern in good faith or provides information to an inquiry or investigation. Any such retaliation is a violation of this Policy and any employee or stakeholder who believes he or she is retaliated against for taking one of these actions is encouraged to report the matter immediately to HR or the Executive Committee. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

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## Policy Review and Maintenance

This policy and procedure is owned by the CHRO. The CHRO will review and update this document and the effectiveness of the policies and procedures annually or as appropriate. Any changes to the policies and procedures will be reviewed and approved by the CentroMotion Chief Executive Officer (CEO).

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