

V O L V O

Tell Us reporting line

Introduction

FAQ and tips for making a report

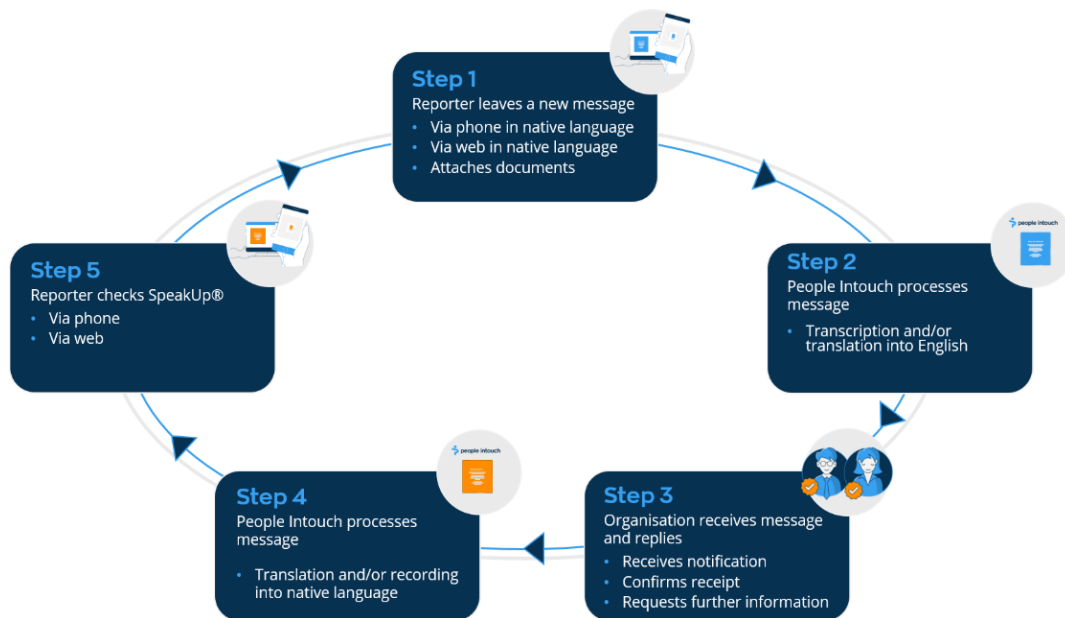
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1 How to leave a message using the Tell Us reporting line



Leaving a message

In the Tell Us reporting line you can choose to leave a (new) message via the SpeakUp® phone or web system – the SpeakUp® system is provided by People Intouch, an independent third party.

We advise that you write down your message beforehand; this way you are sure about the information you are about to give and that your message is comprehensive and to the point.

When making a report, please include a detailed description of your concern (including what has happened, when did it happen, where did it take place, who are involved) and supporting information (e.g. copies of documents or screenshots), if available.

If you provide information about a person, you should refrain from including sensitive personal information which is clearly part of that person's private life (e.g. mental or physical condition or religious beliefs).

When accessing the Tell Us reporting line and the SpeakUp® system you will be given the option to report by phone or by web. After you have made your choice, you will be asked to enter the country specific access code. This code will be clearly provided to you in the system. Finally, select the language in which you would like to leave your message.

Have a pen ready when leaving the message. You will receive a personal six-digit case number, which is randomly generated. It is very important that you **write this down**, as you need it to check the response from Volvo Cars when you come back to the Tell Us reporting line/SpeakUp® later.

If you choose to report using SpeakUp® phone system, make sure to pronounce clearly, and ideally spell out names and locations. When you are finished, simply hang up.

If you use the SpeakUp® web system, you can type in or simply copy/paste your message. It also allows you to upload documents to your message. When you are finished, you can press the 'send message' button; a screen with your case number and message will appear, which can be easily printed out.

What happens in the meantime...

The moment you hang up the phone or you have sent your message, the independent third-party provider, People Intouch, starts the translation of the message into English (if necessary). If it is a phone message, the recorded sound file will be written down word by word. **The recorded sound file will never be handed over to Volvo Cars.**

Once the transcription and translation is done, the exact message - both in the original language as in English - will be sent to dedicated personnel in Volvo Cars' Compliance Investigations Unit (a unit established in the Compliance & Ethics Office). The Compliance Investigations Unit will evaluate the message and send a response to you in the SpeakUp® system.

People Intouch will translate the response and post it in the SpeakUp® system. For phone, People Intouch will also record the response.

Reading your response from Volvo Cars

Within a week, an initial response will generally be ready for you in SpeakUp® system. In general, you can find this response via the same way you have left your message, either by phone or web. Note that it is possible to switch from **phone to web** at a later stage, but you can never switch from web to phone.

To check your reply by telephone, you will be asked to press 1 if you already have a case number. To hear your response, press 1 and enter your case number. After you have heard your response, you can immediately post a new follow-up message; if you need some additional time to think, you can simply hang up/log out and come back another time.

If you notice that a response has not been left for you yet, please be assured that the message is being reviewed and that a response will be available for you in due course. We recommend that you check for a response regularly.

2 Frequently Asked Questions about the Tell Us reporting line and the SpeakUp system

2.1 What is the Tell Us reporting line?

It is a central internal reporting channel enabling all employees within Volvo Cars and any third party to report misconduct that would otherwise not be reported in complete anonymity. The Tell Us reporting line utilizes the SpeakUp® system, which allows you to make a report either by phone¹ or via a secure website, without the interference of a human operator.

2.2 What is the Tell Us reporting line intended for?

The Tell Us reporting line is intended for reports of suspected or observed incidences of misconduct or concerns related to our Code, corporate policies or directives or of laws or regulations².

Examples of misconduct that can be reported include, but are not limited to:

- (i) any act of bribery or corruption (for example collusion with third parties, giving or receiving kick-backs, bid rigging, conflicts of interest, improper sponsorships, donations, gifts & entertainment, illegal or improper gratuities, or facilitation payments)
- (ii) irregularities concerning bookkeeping and financial reporting (including internal accounting controls and auditing matters)
- (iii) financial fraud (for example expense fraud, embezzlement or accounting manipulation)
- (iv) tax evasion
- (v) money laundering
- (vi) violations of competition law (for example price fixing, exchange of price sensitive information, exchange of technically sensitive information or collusion with competitors)
- (vii) violation of trade sanctions or export control
- (viii) potential or actual human rights violations (for example use of child labour, forced labour, structural discriminatory practices, or other human rights violations) linked to Volvo Cars' own operations, value chain or other business relationships
- (ix) any other activities, which by law or regulation amount to serious misconduct (for example violations of environmental regulations)

Note that the Tell Us reporting line is not intended for general concerns about poor or unfair management, workplace bullying, harassment, inefficient systems or other operational feedback or issues. If you wish to raise a concern relating to these areas you should firstly do so through the normal channels, either by contacting your immediate manager or your local People experience (HR) representative.

¹ There are a few countries in which telephone reporting is not available. In these cases, please use the web reporting.

² This includes reports of human rights-related concerns. We have a commitment to respect and promote internationally recognised human rights and international guidelines on business and human rights. These commitments further include respecting human rights when investigating and resolving grievances.

2.3 How does the Tell Us/SpeakUp system work?

Phone: You dial the phone number, enter your access code and leave your message. During your call you will not talk to an operator. All instructions have been pre-recorded and will guide you through the process easily. Within one week you can call back to listen to the company's response. You can post a new follow-up message to this response. This conversation cycle can be repeated endlessly.

(Tip: write down your message before you make the call.)

Web: Proceed to the SpeakUp Web Service page (through a hyperlink or by entering the URL), choose your location, enter the relevant access code and leave your message. Within one week you can return to the Web Service and read a response. You can reply to this response. This communication cycle can be repeated endlessly.

2.4 Who operates the SpeakUp system?

The service is operated by a third party, People Intouch, an independent Dutch company. People Intouch is responsible for processing all messages. Founded in 2004, the company is based in Amsterdam.

2.5 Is it difficult to make a telephone report in the system?

Not at all: straightforward voice prompts guide you through the simple process and phone menu.

2.6 Will my voice be heard by Volvo Cars?

No. The SpeakUp system is operated by People Intouch, an independent company that transcribes and translates your message and sends Volvo Cars a typed word-for-word transcript of what you have said.

(Tip: if you do not feel comfortable leaving a phone message, have someone else read out your message on the phone system or leave a message on the web system)

2.7 Can I file a report anonymously?

Yes. You can file a report anonymously and your confidentiality will be respected. However, we encourage you to identify yourself as it is more difficult, and in some instances even impossible, to investigate reports that are made anonymously.

2.8 What if I want to be identified with my report?

You may identify yourself in your message by stating your name, if you wish. We encourage you to identify yourself for creating best possible conditions for an effective investigation.

2.9 Can my identity be discovered?

Volvo Cars will receive a typed word-for-word transcript of your report. You are in total control of the content of the message you leave: if **you** leave your contact details in your message, the SpeakUp system will forward it to Volvo Cars; if you do **not** leave your contact details, the SpeakUp system and Volvo Cars will not know who you are.

2.10 Can the company trace my connection data?

No, the SpeakUp system is operated by People Intouch. Volvo Cars has no access to the connection data. Phone details or IP-addresses will never be handed over to Volvo Cars.

2.11 What happens with the recording of my message?

Upon confirmation of receipt of the transcribed and/or translated message by Volvo Cars, the recording of the voice message will be erased immediately by People Intouch.

2.12 Will confidentiality ever be broken?

The exception to the afore mentioned: if the SpeakUp system receives a message whereby the reporter is threatening violence or a criminal act, Volvo Cars can request People Intouch to retain the recording to hand it over to the authorities. Still, the voice file and/or connection data will never be handed over to Volvo Cars.

2.13 Who is paying for my call?

Access is generally via a free phone number so you will call at no cost. However, it can be that in exceptional cases (for some mobile operators for instance) local costs will apply.

2.14 Is there a limit on the length of message I can leave?

No. However, after seven minutes you will get a notification followed by an option to continue.

(Tip: try to be as comprehensive and to the point as possible in your message)

2.15 What do I need to do when the SpeakUp Phone system is not accessible?

If you have tried calling from a mobile phone, then please try again using a fixed land line, we have experienced that this is the best way to reach the SpeakUp phone system. If you still encounter problems accessing the SpeakUp phone system, you can file a report using the SpeakUp Web Service page instead.

2.16 How quickly will my message be passed on to Volvo Cars?

Your transcribed message will be sent to Volvo Cars, in principle, within one working day.

2.17 Who at Volvo Cars receives my message?

A limited number of dedicated personnel in the Compliance Investigations Unit, an independent function established in the central Compliance & Ethics Office.

2.18 I want to remain anonymous, but would like to receive a response; how can I manage?

The SpeakUp system will give you a unique case number. Please make sure to write this down carefully. This case number enables you to listen to or read the response from Volvo Cars when you return to the system.

2.19 How quickly can I check for a response?

Volvo Cars strives to respond within one week. If no answer is available after a week, we advise you to try once more after a few days, or you can choose to leave a new message in the same case.

2.20 Can I call SpeakUp at any time?

Yes, the SpeakUp phone service is available 24 hours per day and 365 days a year from every telephone. Each country has its own phone number and access code.

2.21 Can I leave a message in my native language?

Yes, you can generally leave a message in your native language. There are specific language options available for each country. When leaving your message, you can simply choose one of these languages. Responses will be in the same language as well.

2.22 Can I leave documents?

Yes, the SpeakUp Web Service enables you to attach (electronic) documents.

When you left a message on the phone system, you can log on to the web system using the same case number. Press on the button 'if you already have a case number'. Here you can leave your (electronic) documents.

If you would like to stay anonymous, please make sure your contact details are not mentioned in the attachments or in its properties.

2.23 What if I don't remember my case number?

If you have lost your case number, we ask you to leave your message again with a new case number. If you had written down your message for your first call, this will not take up much of your time. Use the new case number for all further communication.

2.24 What happens once I file a report?

The Compliance Investigations Unit will carefully review and assess the information provided in your message. If your initial report does not include enough information/evidence, we will get in touch to ask you to provide more information/evidence.

A case file will be opened if your report includes minimum actionable information and evidence.

Any investigation as a result of your report will be professionally and confidentially handled– we will only involve people who need to be involved depending on the nature of the matter at hand. Volvo Cars investigators may conduct confidential interviews with employees, contractors or anybody they consider is relevant to the investigation.

After reviewing all the findings of our investigation, we will decide if a violation has occurred, and action will be taken as appropriate. You will be informed accordingly.

Information on ongoing and closed cases will be reported to the Global Compliance Committee consisting of members from the Executive Management Team, reporting directly to the Audit Committee of the Volvo Cars Board of Directors.

2.25 Why should I report what I know? What's in it for me?

Volvo Cars is committed to conducting business with honesty, openness and integrity. Our integrity and good reputation depends on employees and others representing Volvo Cars acting according to the highest standards of ethics and in accordance with our Code of Conduct and our corporate policies. That is why we all need to act on violations.

2.26 I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

It is our shared responsibility to live and practice our values. All unethical conduct, at any level, ultimately hurts Volvo Cars and our employees. So if you know of any incidents of misconduct or ethical violations, consider it your duty to report it.

2.27 Does management really want me to report?

We certainly do. In fact, we need you to report. We support a culture of openness, integrity and accountability. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on Volvo Cars and our employees.

2.28 I am not sure if what I have observed or heard is a violation, but it just does not look right to me. What should I do?

As an employee you should initially discuss your concern with your manager or local People Experience (PX) representative. You may also consult a manager of higher rank, the Compliance & Ethics Office or the Legal Department. The Tell Us reporting line can also be used to seek guidance regarding potential misconduct an without fear of retaliation.

We'd rather you inform and ask about a situation that turns out to be harmless, than let possible unethical behaviour go unchecked.

2.29 How are conflicts of interest and other imbalances prevented in investigations?

Compliance Investigations must always be conducted independently and in line with the principles of impartiality, without any conflicts of interests arising from the relation between persons carrying out the Compliance Investigation and anyone involved in the Compliance Investigation. This, for example, means that a direct supervisor of a Compliance Investigator should not investigate a Compliance Investigator under his supervision, and vice versa.

To ensure an impartial and unbiased review of information and evidence, only impartial persons may be responsible for conducting Compliance Investigations.

A Compliance Investigator is not impartial when he/she has a relation, that goes beyond merely being colleagues working for Volvo Cars, to anyone directly or indirectly part of the Compliance Investigation at hand, or if a Compliance Investigator is in any way involved in the matter under investigation, for example as a witness.

Further, there should not be any imbalances between the Compliance Investigator and anyone directly or indirectly involved in the Compliance Investigation. When there is a suspicion that a potential conflict of interest or imbalance exists in respect of a Compliance Investigator, the Chief Compliance & Ethics Officer (CCEO) shall be informed and decide whether the relevant Compliance Investigator can continue to carry out parts of the Compliance Investigation or not. Until a decision is made by the CCEO, the relevant Compliance Investigator must be informed and is not allowed to continue carrying out parts of the relevant Compliance Investigation.

2.30 How long does a Compliance Investigation take?

All reports will be assessed carefully to determine the appropriate course of action. If it is determined that an investigation is required, a Compliance Investigation shall be completed within the shortest timeframe possible – bearing in mind that each Compliance Investigation is unique. The time needed for reaching a closure of a Compliance Investigation can vary from a week up to a few months, or even longer if local authorities or any law enforcement party is involved.

2.31 Are there other channels available to report a compliance concerns?

For reasons of confidentiality, we encourage the use of the Tell Us line for reporting of serious compliance matters. If it is not available or acceptable to you, the Compliance Investigation Unit can be further contacted via:

EMAIL:

codeofconduct@volvocars.com

POSTAL MAIL:

Volvo Cars
Compliance Investigation Unit
Compliance & Ethics Office
Torslanda HABVS
SE-405 31 Göteborg, Sweden

TELL US REPORTING LINE:

<https://www.volvocars.com/intl/v/legal/tell-us-reporting-line>

3 Tips for leaving a message

- ✓ Write down your message before leaving it. When using the web system you can copy/paste the message. When using the phone system you can simply read your message out loud.
- ✓ If you do not feel comfortable leaving a phone message, ask somebody else to read out your message in the phone system or leave a web message.
- ✓ If you are concerned about being traced: use an unidentifiable phone or computer, like a pay phone or an internet cafe.
- ✓ Anyone with access to the PC can view the contents of the web browser cache and find out what web sites and pages have been viewed on that PC recently. Therefore, it is advisable to clear the browser cache memory after using the SpeakUp system.
- ✓ Leave your message on your best suitable time and place. The system is available 24/7 from every telephone or computer.
- ✓ Make sure to write down or print (in case of using the web system) the case number and keep it in a safe place.
- ✓ Remember that the case number is a personal case number. Only you know this number. So, if you want to refer to another case in your message, you should not use this number. You can e.g. instead use the exact date/time with a clear description of the content of the other case.
- ✓ When you leave your message, make sure you have thought about the amount and type of information you want to include in your message.
- ✓ It is helpful to receive as much facts as possible. (for example a clear location, invoice numbers and exact dates).
- ✓ Personal names can also be vital, but please make sure to only include personal names if these are truly needed for the purpose of addressing and solving the matter you report. Keep it factual if you provide information about a person and do not include sensitive information which is clearly part of that persons private life (e.g. mental or physical condition or religious beliefs). If you decide to add names, preferably spell them out.
- ✓ If you have proof of your case in electronic form, please use the upload document facility of the SpeakUp web system. You can even use this web facility when leaving a message by phone, by using the case number you received.
- ✓ Always call back (phone) or log in again (web) to check whether a response was left for you.