

Frequently Asked Questions

About Volvo Group Whistle

What is the Volvo Group Whistle?

The Volvo Group Whistle is a comprehensive and confidential reporting tool utilizing the EthicsPoint software solution provided by NAVEX Global to make it easy and safe for employees, contractors, consultants, suppliers, dealers, business partners, or any other third party to voluntarily report suspected violations of the Volvo Group Code of Conduct, all while cultivating a positive work environment.

Reporting – General

I have a concern. How can I raise it?

If you know about something that doesn't seem right, or which may violate the Volvo Group Code of Conduct, we want you to speak up. Oftentimes, early reporting can help resolve an issue quickly and minimize harm.

To express a concern, you can:

- Talk to your manager, or your manager's manager.
- Talk to a relevant functional group, like HR, Finance, Legal & Compliance or Security.
- Access the Volvo Group Whistle at: www.volvogroup.com under "About Us" or on Violin under "About Volvo Group".
- Write a letter to the Chief Compliance Officer at:

Chief Compliance Officer
AB Volvo
Department AA14100, VGHQ6C
SE-405 08 Göteborg
Sweden

For additional information and guidance, Volvo Group employees can refer to the Volvo Group Whistleblowing and Investigation Policy.

What type of situations should I report?

The Volvo Group Whistle is designed for employees, contractors, consultants, or any other third parties to report concerns regarding possible irregular or questionable accounting practices, purchasing practices, corruption, human and labor rights violations, and other suspected violations of the Volvo Group Code of Conduct.

In particular we would like you to report a concern related to:

- **corrupt practices, including offering or accepting bribes, kickbacks, excessive gifts or hospitality, or facilitation payments – directly or indirectly, such as through a third party;**
- **unfair competition, anti-trust law, export control and trade sanctions violations;**
- **accounting or auditing matters, like error in a financial record, false/inappropriate expense claims or suspected fraud;**
- **non-disclosed conflicts of interest;**
- **theft or misuse of company inventory, cash, equipment, supplies, or other assets;**
- **unauthorized disclosure of confidential information;**
- **discrimination in respect of age, race, gender, religion, nationality, disability, sexual orientation, or any other nature;**
- **harassment and threats, including power and sexual harassment;**
- **signs of modern slavery, including human trafficking or forced, bonded or compulsory labor, or child labor related to Volvo Group operations or any business partner;**
- **employment practices that are not in line with applicable laws or Volvo Group policies and directives;**
- **unpermitted use of intellectual property of the Volvo Group or of a third party;**
- **insider dealing;**
- **money laundering and terrorist financing;**
- **hazards regarding health, safety and security at the workplace;**
- **hazardous waste spills, discharges, or environmental concerns;**
- **product safety;**

- **non-compliance with Volvo Group policies and local or international law.**

Reports made through the Volvo Group Whistle are voluntary and must be made in good faith. The information provided should be as accurate and complete as possible to the best knowledge of the person filling the report.

What companies are in the Volvo Group portfolio? Which companies are in the scope of the Volvo Group Whistle?

Volvo Group comprises of many entities around the globe, which are organized into three Truck Divisions (Group Trucks Operations, Group Trucks Technology and Group Trucks Purchasing), nine Business Areas (Volvo Trucks, Mack Trucks, Renault Trucks, Volvo Buses, Volvo Construction Equipment, Volvo Penta, Arqus, Volvo Financial Services, Volvo Autonomous Solutions) and six Group Functions (Deputy CEO Office, Group Communications, Group Finance, Group Human Resources, Group Legal & Compliance, and Group IT).

If your report or a question relates to any of above-mentioned Truck Divisions, Business Areas or Group Functions, feel free to use Volvo Group Whistle to send them.

If I have a concern, shouldn't I just report it to my manager, or Security, or Human Resources and let them deal with it?

When you have knowledge of or observe behavior you suspect violates our Code of Conduct, we expect you to report it to your manager, or your manager's manager, or a relevant functional group (like HR, Finance, Legal & Compliance or Security).

We recognize, however, that there may be circumstances when you are not comfortable reporting your concern via these channels and third parties may not have access to these options. That is why we have made available alternative options for you to share your concerns or file a report either by using the Volvo Group Whistle or by contacting the Chief Compliance Officer at AB Volvo. Your report helps us proactively identify, address and resolve Code of Conduct related issues.

If your complaint pertains to a matter that, under local law, may not be accepted through the Volvo Group Whistle and this has been verified during the initial review of the complaint, you will be duly notified thereof. In such case, you will need to contact your manager, or your manager's manager, a relevant functional group (like HR, Finance, Legal & Compliance or Security), or write a letter to the Chief Compliance Officer (contact information provided above).

Why should I report what I know?

We all should strive to create a positive workplace environment where we trust each other. This means we are all responsible for behaving in an ethical manner and informing the appropriate people if someone is not acting according to the Volvo Group Code of Conduct or laws. By working together, we can maintain a healthy, passionate, and trustworthy environment. Corporate misconduct can threaten the future of our entire company and wellbeing of all of us.

Does management really want me to report?

We certainly do. In fact, we need you to report. You know what is going on in our company - both good and bad things. You may have initial knowledge of an activity that may be cause for concern. Your report may minimize the potential negative impact on the company and our people. Also, the information you provide may help identify issues that can improve corporate culture and performance. The sooner we know, the earlier we can act to minimize potential negative impact.

Where do these reports go? Who can access them?

Complaints are entered directly onto a secure EthicsPoint server which is hosted by a third party outside the Volvo Group Corporate Network environment. Our service provider, NAVEX Global with their EthicsPoint system, makes these reports available only to a limited number of authorized Volvo Group employees working at Corporate Compliance, who are responsible for assessing the reports and taking appropriate action.

Reports are stored on servers located in the European Union and managed by GCS Compliance Services a sister company to NAVEX Global. These third-party

partners are contractually prohibited from accessing our report data except as needed for translation services.

Can I still file a report if I don't have access to the Internet?

The use of the Volvo Group Whistle requires an Internet connection. If you do not have internet access at home or wish to file a report or ask a question away from the office, you can do it from public locations. Many public locations including public libraries or internet cafes have computers with Internet access. The Volvo Group Whistle is available 24 hours a day, 365 days a year. You do not need to log in to your Volvo account (if you have one) to send a report, you can access the Volvo Group Whistle from the external Volvo Group web page (www.volvogroup.com under "About us").

In addition, you can contact your manager, or your manager's manager, or a relevant functional group (like HR, Finance, Legal & Compliance, Security), or contact the Volvo Group Chief Compliance Officer in writing.

Reporting Security & Confidentiality

Can I file the report anonymously?

Every report or question submitted via the Volvo Group Whistle will remain secure and permit anonymity unless prohibited by local law (in such instance, the system will automatically inform you that anonymous reporting for your country is prohibited). If anonymous reporting is prohibited in your country, your identity will still remain strictly confidential within the Volvo Group.

Volvo Group default preference is for you to identify yourself to increase the quality of the investigation into your report because we can easier communicate with you, in a confidential basis, as the investigation moves forward.

If you feel uncomfortable making a report from your corporate computer, laptop or phone, you have the option of using any other device outside your work environment by accessing the Volvo Group web site, at www.volvogroup.com, and then the Volvo Group Whistle link under "About us".

It is my understanding that any information I send from a company computer generates a server log that shows every web site that my

device connects with, so won't this log identify me as a report originator?

EthicsPoint (the system used for the Volvo Group Whistle) does not generate or maintain internet collection logs containing Internet Protocol (IP) addresses; so, no information linking you or the device you use to access EthicsPoint is available. If you chose to make an anonymous report, it is not technically possible to identify you.

I am concerned that the information I provide to EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?

If you decide to remain anonymous, the EthicsPoint system is designed to protect your anonymity. Where remaining anonymous is permitted, you - as a reporting party and if you so desire - need to ensure that the content of your report does not reveal your identity by accident (for example, do not provide details which can easily identify you, such as "From my cube next to John Smith...").

If you chose to identify yourself or are required to do so by local law, Volvo Group will make every reasonable effort to hold your identity in strict confidence. Please carefully read Data Protection and Privacy Notice for further information.

Why is it better to identify myself when I make a report?

You are strongly encouraged to identify yourself when reporting a concern. By identifying yourself, you allow the company to enter into a confidential dialogue with you and obtain all important details and facts to conduct a better investigation. It is usually easier to express and discuss the concern you have rather than put them in writing. Also, for the investigator, it is a very valuable opportunity to ask questions and better understand the situation. Knowing your name can also help investigators to properly manage the investigation, in particular, in investigations regarding discrimination or harassment.

If you identify yourself when making a report, every effort will be made to keep your identity strictly confidential within the company. For example, in a situation where further investigation may reveal your name to persons who are engaged in

the wrongdoing, the investigator can contact you to ask if you are comfortable with continuing the investigation.

Reporting Tips & Follow Up

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

Our company chooses to promote ethical behavior and to always conduct business according to our Code of Conduct. All unethical conduct, at any level, ultimately hurts the company, all employees, customers and business partners, including you. Simply consider what has happened in recent corporate scandals around the world to see the disastrous effects a seemingly harmless lapse in ethics can have on an otherwise healthy company. So, if you know of any incidents of misconduct or suspect a violation of the Code of Conduct, consider it your duty to yourself and your coworkers to report it.

I am not sure if what I have observed or heard is a violation of the Code of Conduct, or involves unethical conduct, but it just does not look right to me. What should I do?

You can submit a question via the “Ask a Question” function in the Volvo Group Whistle web portal. If you are a Volvo Group employee, you can also discuss your concern directly with your manager, managers of your manager or a relevant functional group (like HR, Finance, Legal & Compliance or Security).

In any case, you can always directly access the “File a Report” function in the Volvo Group Whistle web portal. We'd rather you file a report that after investigation turns out to be unsubstantiated, than let possible unethical behavior go unchecked.

What if my manager or other managers are involved in my concern? Won't they get the report and start a cover-up?

The EthicsPoint software and whistleblower investigation process are designed so that individuals identified in the concern are neither notified nor granted access to reports in which they have been named.

Access to information submitted via the Volvo Group Whistle is limited to a dedicated team within Corporate Compliance and handled on a strictly confidential basis. In case any of these persons are named in your report, they too will be blocked from seeing it.

What if I remember something important about the incident after I file the report? Or what if the investigation team has further questions for me concerning my report?

When you ask a question or file a report via the Volvo Group Whistle you receive a unique key report number and you are instructed to choose a password. This allows you to return to the Volvo Group Whistle web portal any time and access your original report by using the “Follow Up on a Report” option.

PLEASE NOTE: Keep the report key number and the password you created in a safe place. Your report key number and password cannot be restored by anyone (including the EthicsPoint system administrator).

By following up on your report, you can add more information, respond to questions posed by the investigation team, or even ask questions. You can also upload additional files.

The “Follow Up on a Report” option is also available if you have reported anonymously, and you can communicate with the investigation team without disclosing your identity.

We strongly recommend you return to the Volvo Group Whistle regularly and to check for correspondence from the company. You and the company now have entered into a “confidential dialogue”, where situations are not only identified, but can also be resolved.

Are these follow-ups on reports as secure as the first one?

Yes. All communication through the Volvo Group Whistle is technically protected in the same way as the initial report and is handled with the same strict confidentiality.