

Data Protection and Privacy Notice

The data protection and privacy laws and regulations (the “Local Data Privacy Laws”) of certain countries may require that a person making a report containing personal data must be notified and provided with information concerning the information and personal data submitted by that person and must accept the terms and conditions for the use of this helpline service.

You are being requested to read and accept the terms contained below. If you do not wish to accept the terms below and thereby consent to the processing of personal data, we are unable to accept any information through the Volvo Group Whistle web portal and suggest you report the matter to your manager, or your manager’s manager, or a relevant functional group (like HR, Finance, Legal & Compliance, or Security).

If those options are unacceptable or you are a third party, you can contact the Volvo Group Chief Compliance Officer (contact information provided below, under the heading “General”). For additional information and guidance, employees can refer to the Volvo Group Whistleblowing and Investigation Policy.

1. General

The Volvo Group Whistle is a web based intake system provided by AB Volvo, Göteborg, Sweden (“Volvo Group” or “AB Volvo” or “us” or “we”) to its employees, vendors, suppliers, and business partners (“Reporters”) for filing concerns of suspected violations of the Code of Conduct to the extent allowed by the Local Data Privacy Laws (the “Misconduct”, such as violations of laws or regulations; violations of company policies related to the Code of Conduct; offences relating to financial, accounting, auditing, bribery, competition law, and discrimination and harassment).

You may contact AB Volvo with any questions relating to this Notice or this service as follows:

**Group Privacy Officer
AB Volvo
Department AA14110, VGHQ6C
SE-405 08 Göteborg, Sweden
gpo.office@volvo.com
or by phone at: +46 (0)31 66 00 00**

In order to proceed further and for the Volvo Group to be able to receive and process reports or questions via the Volvo Group Whistle, you must confirm that you have read this Data Protection and Privacy Notice in its entirety, and expressly consent to the processing of the reports and/or questions and your personal information if you agree to the terms set forth herein, please by checking the “I CONSENT” box that follows. You will then be able to file a report or ask a question.

You may withdraw your consent at any time, without affecting the lawfulness of the processing prior to such withdrawal.

If you do not wish to provide your consent, you will not be able to file a report or ask a question through the Volvo Group Whistle web portal. Instead, please contact your manager, or your manager’s manager, or a relevant functional group (like HR, Finance, Legal & Compliance, or Security), or the Chief Compliance Officer at AB Volvo (contact information provided above, under the heading “General”) to submit your report or ask a question.

2. Use of the Volvo Group Whistle

Use of the Volvo Group Whistle is completely voluntary and is intended to supplement the other reporting options stated in the procedure for reporting suspected violations of the Code of Conduct. Volvo Group employees are first encouraged to report violations or suspected violations to their manager, or manager’s manager, or a relevant functional group (like HR, Finance, Legal & Compliance or Security). If you feel that you are unable to do so, are uncomfortable with those options, or are a third party, you may submit your report to the Volvo Group Chief Compliance Officer contact information provided above, under the heading “General”) or via the Volvo Group Whistle, in all cases only to the extent allowed by and subject to Local Data Privacy Laws.

In certain countries, AB Volvo may only accept reports through the Volvo Group Whistle that relate to accounting and auditing matters; anti-trust or Unfair Competition; Kickbacks, Bribes, or Improper Gifts; Money Laundering; Misuse of Assets; Insider Trading; or Discrimination or

Harassment. If your complaint pertains to a matter that, under Local Data Privacy Laws, may not be accepted by AB Volvo through the Volvo Group Whistle, you must contact your manager, or your manager's manager, or a relevant functional group (like HR, Finance, Legal & Compliance, or Security), or the Volvo Group Chief Compliance Officer contact information provided above, under the heading "General") to submit your report.

Please be aware that the information you supply about yourself or Volvo Group employees, or any aspect of Volvo Group operations may result in decisions that affect others. Therefore, we ask that you only provide information in good faith that to the best of your knowledge is true. You will not be subject to retaliation from Volvo Group for any report of a suspected Misconduct that is made in good faith, even if it later turns out to be incorrect or unsubstantiated. On the other hand, knowingly providing false or misleading information or otherwise making a complaint in bad faith ("Bad Faith Complaint") will not be tolerated and may expose you to disciplinary measures as well as prosecution or to civil claims by the person who is the subject of the Bad Faith Complaint. The information you submit will be treated confidentially except in cases where this is not possible because of legal requirements or in order to conduct an investigation, in which case the disclosure of information will be limited to the extent necessary pursuant to the applicable local laws.

Certain Local Data Privacy Laws may enable anonymous reporting, however, as the default way of reporting, we encourage you to identify yourself in order for us to follow up with questions we may have. Please note that, in accordance with the above, we shall not disclose your identity unless it is required in order to conduct an investigation, limited to the purposes of such investigation, or in case you have submitted a Bad Faith Complaint, we may disclose your identity to the person reported via the Bad Faith Complaint in order to enable such person to enforce his or her rights arising out of or in connection to the Bad Faith Complaint.

3. What personal data and information is collected and processed?

The Volvo Group Whistle may collect the following personal data and information that you may submit via the tool:

- **your name, your contact details and whether you are employed by Volvo Group,**
- **the name and other personal data of the persons you name in your report if you provide such information (i.e.: description of functions and contact details),**
- **a description of the alleged Misconduct as well as a description of the circumstances of the incident.**

While filling your report via the Volvo Group Whistle, please consider which personal data, both about yourself and about other individuals, is needed for your report to be properly understood and for the investigation team to act. We ask you not to provide personal data of individuals unnecessarily (e.g. data that is not relevant to the reported situation, events or behaviors).

Please note that certain Local Data Privacy Laws may enable anonymous reporting, however, as the default way of reporting, we urge you to identify yourself. However, the personal data relating to you will be treated confidentially and will only be disclosed as set out in this Data Protection and Privacy Notice.

4. How will the personal data and information be processed after your report and who may access personal data and information?

The personal data and information you provide will be stored in a database which is located on servers hosted and operated by GCS Compliance Services Europe Limited (“GCS EU”) in the European Union, a subcontractor of NAVEX Global. AB Volvo has entered into contractual commitments with NAVEX Global, to secure the information and the personal data you provide in accordance with applicable laws. NAVEX Global is committed to maintaining stringent privacy and security practices including those related to notice, choice, onward transfer, security, data

integrity, access and enforcement. The transfer of the personal data of European citizens or residents to NAVEX Global is based on standard contractual clauses issued by the European Commission.

For the purposes of processing your report or question, conducting investigations, and if necessary, initiating disciplinary procedures and imposing sanctions, the personal data and information you provide will be accessed by authorized Volvo Group personnel (the “Authorized Persons”) at Corporate Compliance. The Authorized Persons will evaluate the information provided and conduct a preliminary assessment of the report or question. For the purposes of processing your report or question and subject to the provisions of applicable laws and Local Data Privacy Laws, the personal data and information may be accessed, processed and used by the relevant personnel of AB Volvo and your local Volvo Group company, including but not limited to Corporate Compliance, Human Resources, Finance, Legal, Security, management, external advisors (e.g. legal advisors), or by technical staff at NAVEX Global. Those individuals may be located in the European Union or elsewhere and transfers of personal data to such persons are always secured by safeguards required by the Local Data Privacy Laws.

Personal data and information may also be disclosed, if required by applicable law, to the police and/or other enforcement or regulatory authorities or courts. The relevant bodies that may receive and process personal data may be located in the US or in another country that may not provide the level of data protection available in the EU.

The personal data you provide will be kept, subject to the Local Data Privacy Laws, as long as necessary to process your report or question, initiate proceedings or complete the investigation, or if data must be preserved due to a legal requirement. The personal data will be erased without delay in the event the complaint falls outside the scope of the Volvo Group Whistle as defined by the Local Data Privacy Laws or if the report is found not relevant for AB Volvo (e.g. a report concerns Volvo Car Corporation from Geely Group). In the event a report is considered substantiated, partially substantiated, unsubstantiated and / or closed with insufficient information, the personal data will be erased within two (2)

months from case closure date, unless they are required for disciplinary proceeding, and/or actual or potential judicial/legal/employment proceedings.

Notwithstanding the above, the personal data may be stored for archiving purposes if required by applicable laws.

5. Rights of data subjects

Volvo Group will notify any person who is the subject of a report made via the Volvo Group Whistle, except where, if and to the extent allowed by Local Data Privacy Laws, notice is required to be delayed in order to ensure the integrity of the investigation (such as to prevent the destruction or alteration of evidence).

Subject to the possibility of delay as set out above, the person who is subject of a report made through the Volvo Group Whistle may access the personal data relating to him or her in the Volvo Group Whistle (with the exception of the identity of the reporter) and may request correction or deletion of personal data as well as restriction and objection in accordance with the Local Data Privacy Laws.

The person who has made a report through the Volvo Group Whistle may access the personal data relating to him or her in the Volvo Group Whistle and may request correction or deletion of personal data as well as restriction, portability and objection in accordance with the Local Data Privacy Laws.

In order to exercise the rights set forth in this section 5, please contact the Group Privacy Office at AB Volvo (contact information provided above, under the heading “General”).

You also have a right to lodge a complaint to a supervisory authority in relation to our processing of your personal data.

6. Special Country Regulations

In certain Member States of the European Union or of the European Economic Area, complaints may only be made relating to certain Misconducts, such as Auditing and Accounting Matters; Antitrust or Unfair Completion; Kickbacks, Bribes, or Improper Gifts; Money Laundering; Misuse of Assets; Insider Trading; or Discrimination or Harassment. Furthermore, Local Data Privacy Laws may restrict reports such that only employees in key or management functions may be the subject of a report.

Any concern relating to topics not permitted by law to be reported via the Volvo Group Whistle should be reported directly to your manager, or your manager's manager, or a relevant functional group (like HR, Finance, Legal & Compliance, or Security), or the Volvo Group Chief Compliance Officer contact information provided above, under the heading "General".

- I have read and expressly consent to the processing of my personal data as set forth above, in particular in sections 3 and 4, and I accept the terms of the Volvo Group Whistle. I am aware of the possibility to report anonymously.**