

	Global Anti-Retaliation Policy	GPM 22.2
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Key Takeaway

A Lear Representative shall **not** retaliate against an individual who either reports a Concern or participates in an investigation regarding a Concern.

1.0) Scope/Purpose:

A “speak up” culture is essential to an ethical business culture. Individuals must feel safe to come forward and report suspected unethical or illegal behavior without fear of retaliation. Individuals must also feel safe to assist with inquiries and investigations without fear of retaliation.

Retaliation is any adverse employment action against a reporter, subject, or witness because they have reported a Concern or participated or assisted with an investigation regarding a Concern. Examples of retaliation are listed in Section 6.0 and include termination, demotion, or threats.

This Policy applies to all Lear Representatives worldwide. Capitalized terms are defined below.

2.0) Responsibility

2.1) All Lear Representatives must report any suspected behavior that violates this Policy. Violations of this Policy can be reported in your local language via the [helpline](#), the [webform](#), email (compliance@lear.com) or to the Legal Department or Ethics & Compliance. Reporters may choose to remain anonymous.

2.2) All managers must supervise and monitor their team to ensure compliance with this Policy. Managers may not willfully ignore conduct by anyone on their team that violates this Policy.

2.3) Lear Representatives who violate or who deliberately ignore facts or circumstances that put them on notice of a likely violation of this Policy may face disciplinary action, including dismissal. Managers who explicitly or implicitly condone a team member’s policy violation may also face disciplinary action, including dismissal.

2.4) Lear Representatives may submit any questions about this Policy to the Legal Department or Ethics & Compliance. They may also contact Ethics & Compliance via email (compliance@lear.com), the [helpline](#), or the [webform](#).

2.5) Lear Corporation’s General Counsel and Chief Compliance Officer shall communicate and periodically update this Policy and take appropriate steps to prevent retaliation.

3.0) Definitions

Lear Representative: an employee, seconded employee, intern, temporary or agency worker, officer, director, or agent of Lear Corporation, its subsidiaries, or its JVCOs.

Concern: a sincere belief that a Lear Representative has engaged in, or will engage in, illegal, unethical, or unsafe conduct, or conduct that otherwise violates a Lear policy or the Code of Business Conduct & Ethics.

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Joint Venture Company (JVCO): a joint venture company that is controlled and/or consolidated by Lear Corporation.

4.0) Procedure

A Lear Representative shall **not** retaliate against an individual who either reports a Concern or participates in an investigation regarding a Concern.

5.0) Required Quality Record(s)

N/A

6.0) Forms / Examples

Examples of prohibited retaliation include:

- Exclusion from work-related decisions and activities,
- Verbal abuse by a supervisor or other member of management,
- Termination, demotion, or threats to terminate or demote,
- Denial of promotion, raise, assignment or transfer,
- Suspension or reassignment of job responsibilities,
- Threats of or actual physical harm to persons or property, or
- Any other actions that would have the effect of discouraging a reasonable Lear Representative from reporting a Concern or participating in an investigation regarding a Concern.

Please also refer to the Global Anti-Retaliation Policy FAQs (Appendix, below) for helpful information.

7.0) Reference

7.1) [Code of Business Conduct & Ethics](#)

8.0) Related Documentation

8.1) Complaint Reporting Policy ([GPM 22.1](#))

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9.0) Revision History

Next Schedule Review: 01/03/2028

Revision Date	Description of Revision	Approved By
02/28/2022 Version 1.0	Initial release	A. Pontes
06/25/2025	Policy reviewed, no updates made, and policy re-issued.	J. Gilhool, VP & Chief Compliance Officer

APPENDIX

FREQUENTLY ASKED QUESTIONS

1. What is considered retaliation?

Retaliation is any materially adverse action taken or threatened against an employee because the employee filed a complaint or grievance; sought the aid of Ethics and Compliance; cooperated in an internal investigation, compliance review, spoke up against actual or perceived violations of policy or unlawful acts.

A. Examples of behavior protected from retaliation may include, but are not limited to:

- Refusing to obey an instruction reasonably believed to be in violation of policy or law.
- Complaining about alleged harassment or discrimination against oneself or others.
- Providing information in an internal investigation of alleged misconduct.
- Resisting unwanted sexual advances or intervening to protect others from unwanted sexual advances.
- Requesting reasonable accommodation for disability or religion.

B. Examples of retaliation may include, but are not limited to:

- Unsubstantiated adverse performance evaluations or disciplinary action.
- Unfounded negative job references.
- Arbitrary denial of salary increases, promotions, or other job benefits.
- Unfounded transfer to a less desirable position.
- Bullying, including repeated intimidation or humiliation, derogatory or insulting remarks, or social isolation.
- Physical threats and/or destruction of personal or state property.
- Any unfounded action taken or threatened that would dissuade a reasonable individual from reporting alleged misconduct.

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2. How can I report retaliation?

A. Lear Ethics & Compliance

- compliance@lear.com
- Employee Webform available at everyone.lear.com and click on “[Webform](#)”

B. EthicsPoint / Helpline

- EthicsPoint is a third-party vendor available 24/7 that allows confidential or anonymous reporting. Use this URL to file a report: reportlineweb.com/Lear

C. Lear Human Resources

- HRConcerns@lear.com

3. What can I expect after I report retaliation?

A Lear employee who reports retaliation to the Ethics and Compliance Department through any of the available reporting channels can expect a thorough and timely investigation.

4. What is my duty to report misconduct at Lear?

Lear’s [Code of Business Conduct and Ethics](#) requires employees to report actual or suspected misconduct involving violations of policy or the law. Employees are required to cooperate in internal investigation regarding these reports.

5. Will Lear protect me from retaliation if I report misconduct?

Lear takes reports of retaliation very seriously. Lear has a responsibility to protect its employees from unlawful retaliation. Any employee found to have retaliated against another employee at Lear will be subject to disciplinary action up to and including termination.

6. What if I want to report misconduct anonymously?

Where permitted by law, Lear employees can report misconduct anonymously through EthicsPoint. EthicsPoint is a third-party vendor available 24/7 that allows for anonymous or confidential reporting. Reports of misconduct can be made online at the EthicsPoint webpage here: reportlineweb.com/Lear.