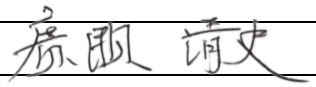
HONDA MOTOR EUROPE LIMITED

EUROPEAN REGION

“HME SPEAK UP”

External Whistleblower Policy

HME/LEGAL/POL/001 V1

Approved by	
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Date	12 October 2026

Policy Document Contents

1. **Policy introduction and purpose** 3
2. **Scope and Application** 3
3. **How to report a concern via HME Speak Up** 3
4. **What concerns can be reported via the HME Speak Up portal** 4
5. **Protection for Reporters (and associated persons)** 5
6. **Handling of Reports** 6
7. **Honda Corporate Governance requirements** 8
8. **Policy Review** 8

Appendix 1: Product or Services Helpline and Breakdown Assistance details in Europe 9

Appendix 2: Revisions for external stakeholders based in Spain 13

External Whistleblower Policy

1. Policy introduction and purpose

1.1 About this Policy

Honda is committed to conducting its business in accordance with the Honda Philosophy and Honda personnel are required to comply with the Honda Code of Conduct and to uphold high ethical standards. Within Honda, a culture of openness and accountability is essential to ensure that concerns about wrongdoing are effectively and appropriately addressed – safeguarding our values and protecting our people, business and "**External Stakeholders**" (including, for example, shareholders, customers, retailers, dealers, distributors and business partners).

To support this, Honda provides its External Stakeholders with a means to "whistle-blow" by reporting any concerns of actual, suspected or planned wrongdoing in or by a Honda Group Company within the Honda Europe, Africa and Middle East Region ("**Honda EAME**") via a Honda whistleblower line using the "**HME Speak Up**" portal (see Section 3 below).

1.2 Policy Purpose

The purpose of this External Whistleblower Policy ("**Policy**") is to:

- explain how concerns can be reported to HME Speak Up;
- clarify what type of concerns can be reported via HME Speak Up;
- describe how individuals are protected when reporting concerns;
- outline how concerns will be investigated and concluded; and
- confirm Honda corporate governance requirements.

2. Scope and Application

This Policy governs the reporting by External Stakeholders of concerns relating to actual, suspected, or planned wrongdoing in or by a Honda Group Company within Honda EAME.

3. How to report a concern via HME Speak Up

3.1 HME Speak Up portal

External Stakeholders may choose to report a concern as a whistleblower ("**Reporter**") by accessing HME Speak Up via a Honda customer website in the relevant country or directly at: https://eu.deloitte-halo.com/whistleblower/website/hondamotoreurope/. HME Speak Up is operated by an independent company.

Reports can be made anonymously, confidentially or openly. Further information concerning protections for Reporters is set out in Section 5 below.

A report can be made in any language supported by HME Speak Up, including a range of European languages.

If a Reporter prefers to report a concern orally rather than in writing via the portal, they may request a meeting by submitting a request to the HME Speak Up portal.

3.2 Reporting manner

When reporting a concern, Reporters should:

- provide as much **relevant information** as possible to enable a full investigation;
- exercise **due care** to ensure the accuracy of the information; and
- reasonably **believe** that the information being disclosed is **true**.

4. What concerns can be reported via the HME Speak Up portal

4.1 External stakeholders should raise a concern to HME Speak Up where they have a **genuine suspicion** of **actual or planned wrongdoing** (including omissions) concerning a Honda Group Company in Honda EAME.

4.2 Examples of **wrongdoing may include**:

- Criminal activity
- Failure to comply with legal, professional or regulatory obligations
- Breach of legislation across areas such as financial services, anti-money laundering, product and transport safety, public health, consumer and data protection, cybersecurity, and competition law
- Non-compliance with internal policies and procedures (including the Code of Conduct)
- Conduct inconsistent with the Honda Philosophy
- Harassment or discrimination (including sexual harassment)
- Financial misconduct (including embezzlement, misreporting, or misuse of funds)
- Impropriety, corruption, fraud or bribery
- Conduct likely to damage Honda's reputation or financial wellbeing
- Unauthorised disclosure of confidential information
- Conflicts of interest
- Danger to health and safety
- Environmental harm
- Deliberate concealment of any of the above.

4.3 Concerns that should not be reported via HME Speak Up but through alternative channels

HME Speak Up is not designed to receive reports relating to the areas set out below.

Emergency services: HME Speak Up is not an emergency service. Please do not report events presenting a threat to life or property. If emergency assistance is required, please contact the relevant emergency service.

Product or service complaints and enquiries: For complaints, enquiries, billing concerns or feedback relating to a Honda product or service, please use the contact details in Appendix 1 for "Europe" (including the UK, EU, Switzerland and Norway), or otherwise consult the Honda customer website in your relevant country.

Honda Breakdown assistance: If Honda break down assistance is required, please use the contact details in Appendix 1 for Europe, or otherwise consult the Honda customer website in your relevant country.

Honda dealer or distributor complaints or feedback: For any complaints or feedback regarding a Honda authorised dealer or distributor*, please use the contact details in Appendix 1 for Europe, or otherwise consult the Honda customer website in your relevant country. (*Honda

authorised dealers and distributors are independent companies that do not form part of the Honda Group of Companies).

Honda supplier concerns: To raise concerns regaining Honda suppliers, please contact the Honda Supplier Ethics Line at SupplierEthicsLine@honda-eu.com

5. Protection for Reporters (and associated persons)

5.1 Choice of disclosure method

It is understandable that Reporters might be concerned about possible repercussions. Reports may therefore be made **anonymously* towards Honda** or **confidentially but on a named basis**.

(**Anonymous disclosures are not encouraged**. *A proper investigation may be more difficult or impossible if Honda cannot obtain further information from a Reporter. It is also more difficult to establish whether any allegations are credible*).

5.2 Protection for Reporters

Reporters shall **not suffer any negative consequences** (e.g. threatening behaviour, unfavourable treatment, disputes etc.) as a result of raising a **genuine ethics concern**, **even if** the concern is **not substantiated** following investigation. This protection extends to Reporters (anonymous or not) who have: (a) communicated (or publicly disclosed) genuine ethical concerns, and (b) subsequently been identified. Any concerns regarding negative treatment should be **raised immediately** via HME Speak Up.

A "**genuine ethics concern**" is one where: (a) there are reasonable grounds to believe that information provided is true at the time of disclosure, even if the Reporter is unable to provide conclusive evidence; (b) the concern falls within the scope of the Policy (as set out under Section 4); and (c) the Reporter has followed the relevant reporting procedure (as referred to under Section 3).

5.3 Protection for associated persons

Protection from retaliation (negative consequences) also extends to the following categories of individual:

(a) **individuals who have assisted the Reporter** during the process of raising a genuine ethics concern;
(b) **persons who are connected to the Reporter** and who may suffer retaliation, such as co-workers, relatives or employees of a Honda Group company; and
(c) **legal representatives** who have acted as advisors or provided support to the Reporter.

5.4 Protection following public disclosure

Public disclosures shall be protected from retaliation if they fall within the scope of this Policy and one of the following conditions is met:

(a) the Reporter has first communicated their concern through HME Speak Up, and appropriate action has not been taken within the prescribed time limits; or
(b) the Reporter has reasonable grounds to believe that ethical concerns falling under the scope of this Policy (as set out under Section 4) may constitute an imminent or manifest danger to the public interest – particularly in emergency situations such as risk of irreversible damage, including to personal safety.

5.5 Reservation of action

Notwithstanding sections 5.2 to 5.4, Honda Group companies reserve their rights (including but not limited to notification to police, or relevant regulatory bodies, or initiating or continuing a court action or other dispute) where:

(a) a reported concern is found to be malicious or vexatious; and/or
(b) the Reporter's actions could be considered to victimise or deter others from raising concerns.

5.6 Confidentiality

Whilst measures shall be taken to protect the confidentiality of all concerns reported to HME Speak Up (including the identity of a Reporter, the subject matter of the report, the investigation process and the outcome report), it may be necessary to disclose certain information if we are required to do so by law e.g., by a Court order. The Reporter shall be informed before their identity is disclosed, unless doing so risks the investigation or breaking the law.

6. Handling of Reports

6.1 Initial Review and Response

All reports received by the HME Speak Up portal are initially reviewed by a trained professional at an external and independent company (currently Deloitte LLP) (the "**External Facilitator**").

Within one (1) full business day of receiving a report sent during office hours (excluding public holidays in the country in which the External Facilitator is based), the External Facilitator will provide a summary report to **HME Compliance Management** via a secure online portal. This summary will take into consideration requests for anonymity and confidentiality and will be translated into English, where required.

HME Compliance Management is comprised of the senior management members of Honda Motor Europe Limited with responsibility for legal and compliance.

HME Compliance Management will consider the report and make an initial determination regarding: (a) whether the concerns raised fall within the scope of this Policy and warrant further investigation; and (b) whether the concerns are admissible, meaning that they are not clearly implausible, manifestly unfounded, obtained through potentially unlawful means, or merely repeat previously reviewed matters without providing new and significant information.

An initial response will usually then be sent to the Reporter within two (2) full business days (excluding public holidays in the UK) following receipt of the report from the External Facilitator. If the report is unclear, additional information may be requested to clarify the concerns raised.

6.2 Establishing the Case Team

The "**Case Team**" shall consist of:

- **HME Compliance Management** (as detailed above);
- **The Decision Maker**;
- **The Case Advisor(s)** (where strictly necessary); and
- **The Investigator**.

A. **The Decision Maker**

If any reports raised via HME Speak Up are deemed by HME Compliance Management to require investigation, HME Compliance Management will inform the **Regional (or Deputy Regional) Compliance Officer** for Honda EAME.

The Regional (or Deputy Regional) Compliance Officer(s) will act as "Decision Maker" following the investigation.

B. **The Case Advisors**

Where **strictly necessary**, the Decision Maker and the HME Compliance Management may request the support of **independent senior managers** having **relevant expertise** to advise on the scope of the investigation ("**Case Advisors**").

C. **The Investigator**

The Decision Maker and HME Compliance Management (taking into consideration the views of the Case Advisors, where applicable) will appoint an independent senior manager to investigate the concerns raised by the Reporter (the "**Investigator**"). The Investigator will be selected based on factors such as their impartiality, specialist knowledge, relevant experience and language capabilities.

6.3 Case Team: Professional standards and addressing any concerns

A. **Case Team professional standards**

Members of the **Case Team** will be subject to high professional standards of independence and confidentiality and will undergo (or have already undertaken) **specialist training** in responding to whistleblower claims.

B. **Reporter concerns regarding the Case Team**

If a Reporter has concerns about individuals who may form part of the Case Team, they should specify and justify their concerns when first raising their report to HME Speak Up. The decision as to the Case Team will ultimately rest with the Decision Maker.

6.4 Investigation

The Case Team will agree on the most appropriate way to investigate concerns raised.

The investigation may take many forms involving e.g., an interview with the Reporter and other persons to whom a report might concern or who may have witnessed events, reviewing policies, procedures, documents, accounts etc.

The HME Compliance Management will aim to keep the Reporter informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent HME Compliance Management from giving specific details. Any information about the investigation should be treated as confidential.

The Reporter may, if they wish, be accompanied by a companion to any interview. This companion should be unconnected to the subject matter of the report. The Reporter should provide details of the companion to the HME Compliance Management (via the HME Speak Up) in advance of an interview.

6.5 Decision

Following investigation, the Regional (or Deputy Regional) Compliance Officer for Honda EAME will decide what action needs to be taken.

The action to be taken will vary, depending on the nature of the concerns raised, but may include a range of responses including (but not limited to):

(a) invoking the Honda disciplinary procedure, or terminating the contract of a contractor;
(b) providing training or guidance to a member of Honda personnel or a contractor (being the subject of a whistleblowing concern);
(c) appointing a senior manager or external consultant to review a process; and/or
(d) immediately reporting issues of a criminal nature to the police or other regulatory body as is deemed appropriate.

6.6 Outcome report

If appropriate, upon the conclusion of the investigation, the outcome will be confirmed to the Reporter. Sometimes the need for confidentiality may prevent HME Compliance Management from giving specific details of any action taken. In addition, due to data protection, Honda will not be able to inform the Reporter of any action taken against Honda personnel.

6.7 Appeal

While the outcome sought by the Reporter cannot be guaranteed, Honda is committed to addressing reports fairly and in an appropriate way. If a Reporter is dissatisfied with the way in which a concern has been handled, s/he can request that this is communicated to the Decision Maker.

7. Honda Corporate Governance requirements

7.1 Regional Compliance and Ethics Committee

To ensure appropriate corporate governance, all concerns reported via HME Speak Up shall be notified to the Regional Compliance and Ethics Committee ("**RCEC**") on a confidential and anonymised basis.

The RCEC meets quarterly and reviews a summary report which includes: (a) the category of each concern raised; (b) whether the concern was substantiated following investigation; and (c) any general countermeasures implemented in response.

7.2 Concerns of Fraud

Concerns reported to HME Speak Up relating to fraud shall be reported to the parent company of Honda Motor Europe Limited, Honda Motor Co., Ltd in Japan (on an anonymised and confidential basis) in accordance with Honda's Regional Anti-Fraud Policy.

8. Policy Review

This Policy is reviewed every 2 years to ensure that it meets legal requirements and industry standards.

Appendix 1: Product or Services Helpline and Breakdown Assistance details in Europe

Country	Honda Roadside Assist	Product or Services Helpline
Austria	+431206093010	**Address**: Customer Relations, Branch of Honda Motor Europe Ltd, Wienerbergstraße 3-5, 5th floor, 1100 Vienna **Telephone**: +43 1 42 411-00 **URL**: https://www.honda.at/cars/useful-links/contact-us.html
Belgium	+3225855433	**Address**: Customer Relations, Honda Motor Europe Ltd. Belgian Branch, Wijngaardveld 1, B-9300 Aalst **Telephone**: 00800 7007 0000 **Email**: cco@honda-eu.com
Czech Republic	+420 239 050 398	**Address**: Customer Relations, Honda Motor Europe Limited, organizační složka Česká republika, Bucharova 2641/14, 158 00 Praha 5 **Telephone**: +420 257 100 111 **Email**: info.cz@honda-eu.com
Denmark	+4547372512	**Address**: Customer Relations, Honda Motor Europe Denmark Branch of Honda Motor Europe Ltd., Kokholm 1C, 6000 Kolding **Telephone**: +45 80 25 46 02 **URL**: https://www.honda.dk/cars/useful-links/contact-us.html
France	+33173431039	**Address** : Customer Relations, Honda Motor Europe Ltd – Succursale France, 3 rue de la Galmy – 77700 Chessy **Telephone**: +331 60 37 30 48 **Email** : contact.hondafrance@honda-eu.com

Germany	+496938078773	**Address**: Customer Relations, Niederlassung der Honda Motor Europe Ltd., Postfach 10 32 33 D-60102 Frankfurt am Main **Telephone**: +49 69 83 00 60 **URL**: https://www.honda.de/cars/useful-links/contact-us.html
Hungary	+3617799111	**Address**: Customer Relations, Honda Motor Europe Ltd., Magyarországi Fióktelepe, 2040 Budaörs, Puskás Tivadar út 1. **Telephone**: +36 23 506 406 **Email**: *info.hu@honda-eu.com*
Italy	+39223312006	**Address**: Customer Relations, Honda Motor Europe Ltd – Italia, Via della Cecchignola, 13, 00143 - Roma, Italia **Telephone**: 800 88 99 77 **URL**: https://www.honda.it/cars/useful-links/contact-us.html
Luxembourg	+3523420809288	**Address**: Customer Relations, Honda Motor Europe Ltd. Belgian Branch, Wijngaardveld 1 B-9300 Aalst **Telephone**: 00800 7007 0000 **Email**: cco@honda-eu.com
Norway	+4724004628	**Address**: Customer Relations, Honda Motor Europe Ltd Norge Norsk Avdeling Av Utenlandsk Foretak, Postboks 664, 3003 Drammen **Telephone**: +47 32 25 48 00 **Email**: honda-norway@honda-eu.com

Netherlands	+31707006448	**Address**: Customer Relations, Honda Motor Europe Limited, Crystal Building B-unit B11.2, Rivium Boulevard 222A, 2909 LK Capelle aan den IJssel **Telephone** : 00800 7007 0000 **Email**: customer.service@honda-eu.com
Poland	+48223065243	**Address:** Customer Relations, Honda Motor Europe Ltd Odział w Polsce, ul. Domaniewska 50, 02-672 Warszawa (Tulipan house) **Telephone**: +48 22 545 7 999 **Email**: honda.pl@honda-eu.com
Portugal	N/A	**Address:** Customer Relations, Honda Motor Europe Limited - Sucursal em Portugal, Rua do Centro Empresarial, Lote 310, Edificio 13, Escritório 2.16, Quinta da Beloura 2710-444 Sintra **Telephone**: **+351** 808 910 911 **Email**: honda.motos@honda-eu.com
Slovakia	+421268623263	**Address:** Customer Relations, Honda Motor Europe Limited Slovensko, organizačná zložka, Cesta na Senec 2/A, 821 04 Bratislava **Telephone**: +421 232 131 111 **Email**: info.sk@honda-eu.com
Spain	+39223312006	**Address**: Customer Relations, Honda Motor Europe Ltd., Sucursal en España, trading as Honda (Spain), C/ Mar del Nord, 1 Polígono Industrial " La Torre del Rector ", 08130 Santa Perpétua de Mogoda, Barcelona, España **Telephone**: +34 902424646 **Email**: atencionalcliente.auto@honda-eu.com

Sweden	+46858771108	Honda Motor Europe Ltd Branch Sweden Box 31002, 200 49 Malmö **Telephone**: +46 771 18 04 10 **URL**: https://www.honda.se/cars/useful-links/contact-us.html
Switzerland	+41445299205	**Address**: Customer Relations, Honda Motor Europe Ltd, Bracknell, Vernier/Geneva branch Route de Meyrin 123 CH-1219 Châtelaine **Telephone**: 0800 036 036 **Email**: Info.ch@honda-eu.com
UK	+442079493185	**Address**: Customer Relations, Honda Motor Europe Limited, Cain Road, Bracknell, Berkshire RG12 1HL **Telephone**: +44 345 200 8000 **URL**: https://www.honda.co.uk/cars/contact-us.html

Appendix 2: Revisions for external stakeholders based in Spain

This **Appendix 2** sets out amendments to Sections 3 and 6 of the External Whistleblower Policy which are applicable to Reporters in Spain only. Insertions compared to the main body of the External Whistleblower Policy are set out in *blue italics*. Deletions are shown as text with "strikethrough".

Amendments to Section 3

3. How to report a concern via HME Speak Up

3.1 HME Speak Up portal

External stakeholders may choose to report a concern as a whistleblower ("**Reporter**") by accessing HME Speak Up via a Honda customer website in the relevant country or directly at: https://eu.deloitte-halo.com/whistleblower/website/hondamotoreurope/. HME Speak Up is operated by an independent company.

Reports can be made anonymously, confidentially or openly. Further information concerning protections for Reporters is set out in Section 5 below.

A report can be made in whichever European language a Reporter feels most comfortable using.

If a Reporter prefers to report a concern orally rather than in writing via the portal, they may request a meeting by submitting a request to the HME Speak Up portal. *These meetings will be conducted within seven (7) business days of the request submission, excluding UK and Spanish public holidays.*

External reporting channels

Instead of, or in addition to, reporting a concern via HME Speak Up, Reporters in Spain can also report concerns externally. A list of competent Spanish and EU authorities is set out below. Please note that we strongly encourage reports to be made via HME Speak Up, so that any concerns can be efficiently resolved.

- *Autoridad Independiente de Protección del Informante: Canales de presentación de informaciones - proteccioninformante.es*
- *Antifrau de Cataluña: Solicitud o instancia genérica | Oficina Antifraude de Catalunya*
- *Autoridades locales en materia de protección al consumidor*
- *Para denuncias sobre seguridad del transporte (aviación civil y trabajo marítimo): Buzón inspección transportes*
- *Para informaciones sobre fraude, corrupción o cualquier otra actividad ilegal que afecte a fondos europeos: Servicio Nacional de Coordinación Antifraude (SNCA)*
- *Servicio Ejecutivo de la Comisión de Prevención del Blanqueo de Capitales e Infracciones Monetarias (SEPBLAC)*
- *Agencia Española de Protección de Datos (AEPD)*
- *Comisión Nacional del Mercado de la Competencia (CNMC) y Canal de informantes Anónimos de Competencia (SICA)*
- *Comisión Nacional del Mercado de Valores*
- *Banco de España*
- *European Commission*
- *European Anti-Fraud Office (OLAF)*

- *European Maritime Safety Agency (EMSA)*
- *European Union Aviation Safety Agency (EASA)*
- *European Securities and Markets Authority (ESMA)*
- *European Medicines Agency (EMA)*

3.2 Reporting manner

When reporting a concern, Reporters should:

- provide as much **relevant information** as possible to enable a full investigation;
- exercise **due care** to ensure the accuracy of the information; and
- reasonably **believe** that the information being disclosed is **true**.

Amendments to Section 6

6. Handling of Reports

6.1 Initial Review and Response

All reports received by the HME Speak Up portal are initially reviewed by a trained professional at an external and independent company (currently Deloitte LLP) (the "**External Facilitator**").

Within one (1) full business day of receiving a report sent during office hours (excluding public holidays in the country in which the External Facilitator is based), the External Facilitator will provide a summary report to **HME Compliance Management** via a secure online portal. This summary will take into consideration requests for anonymity and confidentiality and will be translated into English, where required.

HME Compliance Management is comprised of the senior management members of Honda Motor Europe Limited with responsibility for legal and compliance.

HME Compliance Management will consider the report and make an initial determination regarding: (a) whether the concerns raised fall within the scope of this Policy and warrant further investigation; and (b) whether the concerns are admissible, meaning that they are not clearly implausible, manifestly unfounded, obtained through potentially unlawful means, or merely repeat previously reviewed matters without providing new and significant information.

An initial response will usually then be sent to the Reporter within *a maximum of seven (7) calendar days following its submission via HME Speak Up to acknowledge its receipt, unless this could jeopardise the confidentiality of the communication* ~~**two (2) full business days (excluding public holidays in the UK) following receipt of the report from the External Facilitator.**~~ If the report is unclear, additional information may be requested to clarify the concerns raised.

6.2 Establishing the Case Team

The "**Case Team**" shall consist of:

- **HME Compliance Management** (as detailed above);
- **The Decision Maker**;
- ***The System Responsible;***
- **The Case Advisor(s)** (where strictly necessary); and
- **The Investigator**.

A. **The Decision Maker**

If any reports raised via HME Speak Up are deemed by HME Compliance Management to require investigation, HME Compliance Management will inform the **Regional (or Deputy Regional) Compliance Officer** for Honda EAME.

The Regional (or Deputy Regional) Compliance Officer(s) will act as "Decision Maker" following the investigation.

B. ***The System Responsible***

If any reports raised via HME Speak Up which are deemed to require investigation relate to Honda entities in Spain, the HME Compliance Management will also inform the "System Responsible", being a Honda manager located in Spain.

Acting independently, the System Responsible shall ensure that this Policy (including the operating framework set out within this Section 6) is complied with.

C~~B~~. **The Case Advisors**

Where **strictly necessary**, the Decision Maker and the HME Compliance Management may request the support of **independent senior managers** having **relevant expertise** to advise on the scope of the investigation ("**Case Advisors**"). *The System Responsible may also act as Case Advisor provided that the requirements and obligations associated with its role as a System Responsible continue to be met and there is no conflict of interest.*

D~~C~~. **The Investigator**

The Decision Maker and HME Compliance Management (taking into consideration the views of the Case Advisors, where applicable) will appoint an independent senior manager to investigate the concerns raised by the Reporter (the "**Investigator**"). The Investigator will be selected based on factors such as their impartiality, specialist knowledge, relevant experience and language capabilities. *The System Responsible may act as Investigator (if not also a Case Advisor) provided that the requirements and obligations associated with its role as a System Responsible continue to be met and there is no conflict of interest.* There may be more than one investigators.

6.3 Case Team: Professional standards and addressing any concerns

A. **Case Team professional standards**

Members of the **Case Team** will be subject to high professional standards of independence and confidentiality and will undergo (or have already undertaken) **specialist training** in responding to whistleblower claims.

B. **Reporter concerns regarding the Case Team**

If a Reporter has concerns about individuals who may form part of the Case Team, they should specify and justify their concerns when first raising their report to HME Speak Up. The decision as to the Case Team will ultimately rest with the Decision Maker.

6.4 Investigation

The Case Team will agree on the most appropriate way to investigate concerns raised.

The investigation may take many forms involving e.g., an interview with the Reporter and other persons to whom a report might concern or who may have witnessed events, reviewing policies, procedures, documents, accounts etc.

The HME Compliance Management will aim to keep the Reporter informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent HME Compliance Management from giving specific details. Any information about the investigation should be treated as confidential.

The Reporter may, if they wish, be accompanied by a companion to any interview. This companion should be unconnected to the subject matter of the report. The Reporter should provide details of the companion to the HME Compliance Management (via the HME Speak Up) in advance of an interview.

6.5 Decision

Following investigation, the Regional (or Deputy Regional) Compliance Officer for Honda EAME will decide what action needs to be taken.

The action to be taken will vary, depending on the nature of the concerns raised, but may include a range of responses including (but not limited to):

(e) invoking the Honda disciplinary procedure, or terminating the contract of a contractor;
(f) providing training or guidance to a member of Honda personnel or a contractor (being the subject of a whistleblowing concern);
(g) appointing a senior manager or external consultant to review a process; and/or
(h) immediately reporting issues of a criminal nature to the police or other regulatory body as is deemed appropriate.

In all cases in Spain, the individual subject of any report will have the right:

(a) to be informed of the acts or omissions attributed to them at such time and in such manner as is considered appropriate to ensure the integrity of the investigation;
(b) to, following point (a), be heard at any time, upon request – retaining their right to defence;
(c) to be presumed as innocent in the absence of evidence to the contrary and to maintain their honour;
(d) to access the investigation file under the terms regulated by Spanish law;
(e) to benefit from the same protection as established for Reporters under Section 5.2 of the Policy,
(f) to confidentiality of the facts and data of the investigation, subject to Section 5.6 of the Policy.

6.6 Outcome report

If appropriate, upon the conclusion of the investigation, the outcome will be confirmed to the Reporter. Sometimes the need for confidentiality may prevent HME Compliance Management from giving specific details of any action taken. In addition, due to data protection, Honda will not be able to inform the Reporter of any action taken against Honda personnel.

*The conclusion of the investigation (including the decision and outcome report) will not exceed the maximum term of **three (3) months** from acknowledgement of receipt of the report via HME Speak Up or, if no acknowledgement of receipt was sent to the Reporter, three (3) months from the expiry of the seven-day (7-day) period following the submission of a report. Notwithstanding the above, in cases of particular complexity, the time limit may be **extended** by **up to a maximum of a further three (3) months**.*

6.7 Appeal

While the outcome sought by the Reporter cannot be guaranteed, Honda is committed to addressing reports fairly and in an appropriate way. If a Reporter is dissatisfied with the way in which a concern has been handled, s/he can request that this is communicated to the Decision Maker.

--End of Policy--