

T E S L A

# Guideline for Tesla Integrity Line



## Let Us Know!

Tesla strives to be a company that does the right thing. If Tesla, or someone representing Tesla, violates the laws or regulations of the European Union (“EU”), national laws (together referred to as “Applicable Laws”), or Tesla’s internal policies, we want to know so that we can investigate and take appropriate action. This Guideline incorporates the protections of the laws and regulations governing companies that conduct business in the EU, including but not limited to the EU Whistleblower Directive and data protection regulations.

**1. What types of issues does this Guideline cover?**

- a. Applicable Laws violations** - This Guideline covers violations of Applicable Laws by Tesla or its employees, directors, contractors, suppliers in the course of their work for Tesla, particularly in the following areas:
- i. Public procurement;
  - ii. Financial services, products, and markets, prevention of money laundering and terrorist financing;
  - iii. Product safety and compliance;
  - iv. Transport safety;
  - v. Protection of the environment;
  - vi. Radiation protection and nuclear safety;
  - vii. Food and feed safety, animal health, and welfare;
  - viii. Public health;
  - ix. Consumer protection;
  - x. Protection of privacy and personal data, security of network and information systems;
  - xi. Breaches affecting the financial interests of the EU (as referred to in Article 325 Treaty on the Functioning of the European Union ("TFEU"));
  - xii. Breaches relating to the internal market including violation of EU competition and State aid rules, and corporate tax law (as referred to in Article 26(2) TFEU).
- b. Tesla's Code of Business Ethics and Tesla's Supplier Code of Conduct** - This Guideline applies to serious violations of [Tesla's Code of Business Ethics](#) and [Tesla's Supplier Code of Conduct](#), by Tesla or its employees, directors, contractors, suppliers in the course of their work for Tesla. This includes but is not limited to concrete indications of:
- I. Accounting/Audit Irregularities
  - II. Anti-Corruption & Bribery
  - III. Antitrust Violations
  - IV. Code of Conduct Violations
  - V. Conflicts of Interest
  - VI. Data Privacy or Data Security Breaches
  - VII. Discrimination
  - VIII. Environmental Protection
  - IX. Fraud
  - X. Excessive Gifts and Entertainment
  - XI. Harassment
  - XII. Import/Export Issues
  - XIII. Insider Trading
  - XIV. Procurement Issues
  - XV. Production Safety
  - XVI. Retaliation
  - XVII. Securities Violations
  - XVIII. Theft
  - XIX. Unauthorized Discounts
  - XX. Sales Practices
  - XXI. Workplace Violence

**2. What types of issues does not this Guideline cover?**

- a. Customer service issues** - Customer service issues (e.g., questions or inquiries regarding individual Tesla products, feedback, or complaints about monitoring, remote diagnostics, software updates, annual inspections, and general services provided by Tesla or our business partners) are generally not covered by this Guideline. Customer service questions and comments should be directed to the local service center.
- b. Data protection violations** - If you are reporting a violation of data protection regulations (such as a personal data breach that requires an immediate response), please contact Tesla's Data Protection Officer at [privacy@tesla.com](mailto:privacy@tesla.com) immediately.

### 3. How can I make a report?

- a. If you have a concrete indication of a violation of any Applicable Law or serious violation of Tesla's Code of Business Ethics or Supplier Code of Ethics, you have reporting options:
  - i. **Secure portal:** You can click [here](#) to submit a report via our secured reporting portal.
  - ii. **Email:** You may send an email to [compliance@tesla.com](mailto:compliance@tesla.com).
  - iii. **Telephone:** You can [click](#) here to see your country's hotline number

If you are a Tesla employee, your options for reporting are:

- i. Your manager
  - ii. Legal or Compliance Department,
  - iii. The Internal Audit or
  - iv. Human Resources teams
  - v. Employee Relations
- b. You will be asked to provide pertinent facts (who, what, when, where, how) and upload any supporting evidence you may have.
  - c. It will be helpful to provide your name and contact information so that the assigned investigator can follow up with you if needed. However, Tesla's concern is identifying and remedying violations of law and Tesla's internal rules, not discovering your identity if you do not want to disclose it. Therefore, unless prohibited by law, you may make a report of a violation of law anonymously and will not need to disclose your name or identifying information, however, anonymity may limit the ability to fully and thoroughly investigate a claim.

### 4. Will my report be handled with confidentiality?

- a. YES!
- b. It will be helpful to have your contact information but if you choose to report anonymously, be very careful not to divulge your name, contact information, or any other details that may inadvertently expose your identity.
- c. The reporting platform and the information you provide will be secure, compliant with data privacy law and regulations and the principles set forth by Tesla Privacy Policies, and accessible only to those individuals who have a need to know the information to facilitate investigation and action. The necessary steps will be taken to reasonably protect your confidentiality and other associates involved in the investigation (such as the subject of the investigation and witnesses). However, this cannot be ensured in all cases, e.g., when the investigation reveals conclusions that Tesla determines should be disclosed to an authority such as a government agency. In such cases, you will be informed before your identity is disclosed, unless such information would jeopardize the related investigations or judicial proceedings.

### 5. What can I expect during this process?

- a. You should expect to receive confirmation that your report has been received within seven days.
- b. A qualified investigator will review the report carefully and will determine appropriate next steps (e.g., internal investigation, engagement of ombudsperson or law firm, report to law enforcement, referral to another appropriate Tesla department for handling, or other resolution).
- c. During the course of the investigation, the party against whom an allegation is made will be treated with respect and the presumption of innocence. Investigations will comply with local labor and employment laws.
- d. Investigators may need to follow up with you following your report to clarify matters and ask for additional details. Please note that due to legal reasons (including privacy rights), we may not share details about the investigation with you. We will generally be able to let you know that an investigation has been finalized.

**6. What if I'm retaliated against?**

- a. Tesla takes seriously your rights to raise concerns in good faith without fear of retaliation, discrimination, or harassment. Any form of retaliation, including threats of retaliation and attempts of retaliation, discrimination, and harassment are prohibited. If you believe you have been retaliated against because you submitted a report of unlawful activity related to Tesla's work, please report it here via the web portal, email to [compliance@tesla.com](mailto:compliance@tesla.com), or telephone to [phone number]. Tesla will investigate claims of retaliation, discrimination, or harassment and, if substantiated, will take corrective action
- b. False allegations not made in good faith, e.g., with malicious intent to harm another associate, are prohibited.
- c. Self-reporting will not immunize you from the consequences of your own misconduct. However, the act of voluntarily coming forward and self-reporting may be considered when determining appropriate sanctions or remedial actions (e.g., mitigation of or

**7. Who is responsible for this Guideline?**

Tesla's Legal Compliance department is responsible for this Guideline and its implementation. For any questions about this Guideline, please contact [compliance@tesla.com](mailto:compliance@tesla.com).