

Integrity Helpline – Whistleblowing Policy

Version V2

Date of approval: April 22, 2022

If you see anything that you think may be a violation of the Code, it is your responsibility to speak up to support the highest levels of integrity and ethical behavior.

There should be no doubt that reporting these matters is safe. The Company will always protect you from any kind of retaliation if you report matters in good faith.

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1. Purpose

At Stellantis we are committed to **complying with applicable laws as well as with the Group's principles and regulations**. This is fundamental to the way we do business and is not negotiable.

To fulfill this responsibility and protect our Company, **we must speak up when we observe conduct that is inconsistent with Stellantis's standards**.

In line with local legal requirements as well as in order to incorporate the **culture of integrity** into the day-to-day operations, Stellantis has developed this **Integrity Helpline Policy ("Policy")**.

The **purpose of this Policy** is to define the applicable rules for the **receipt and management of any concerns regarding potential violations of the Code, reported via the Integrity Helpline and all other available channels described in the Stellantis Code of Conduct**.

The Integrity Helpline allows the Stellantis workforce and stakeholders to communicate **potential violations of the Code of Conduct, other instances of non-compliance, potential conflicts of interest, or questions on compliance**.

Moreover, the Integrity Helpline will track all cases reported via all the available channels, up to completion.

2. Scope

The application of these rules applies to everyone in Stellantis, at every level, including **employees, supervisors, contractors and board members**.

3. Definitions

The Code of Conduct (Code) sets Principles, which are core statements that express the Stellantis's commitment to integrity in business and personal conduct.

Group Compliance Policies provide expanded guidance on some of the Principles of the Code. The Group Policies give real life examples of how to apply the Principles in daily activities and foreseeable situations.

Compliance Procedures provide detailed information, process and operating modes to apply the related Policies. Some Procedures apply globally, while others apply only to certain geographical or specific business areas.

Good Faith - A genuine belief that a potential code of conduct violation exists or that possible misconduct has occurred. Good faith requires that a complete and accurate report is given.

Retaliation - Any negative action taken against a person for reporting a concern or misconduct in good faith or participating in an investigation regarding reported conduct. Such actions include threats, intimidation, exclusion from team events, harassment, discrimination, limiting career opportunities, reassignment, negative performance feedback independent of actual performance deficiencies, or termination.

4. Responsibilities

Stellantis **Audit and Compliance** Department (“A&C”) has responsibility for the Integrity Helpline as well as investigations related to ethics and compliance concerns.

Incoming reports are routed, based on **geographical location**, to **certain expressly authorized and specially trained** employees of A&C.

Only A&C and any other department that may be authorized for this purpose, shall conduct investigations regarding concerns about potential violations to the Code. **No other** personnel, including supervisors, may conduct this kind of investigation independently.

A&C shall report cases and the investigation results to **Regional or Global E&C Committees (ECC)**, who are in charge of **reviewing and approving the case outcomes, including the actions taken by management**, and shall assist in the Program’s delivery of efficient mechanisms, such as the whistleblower system.

Moreover, the ECCs shall receive and review statistical reports regarding the functioning of the Group compliance program, including the number and types of allegations or questions collected through the Integrity Helpline and any disciplinary or mitigating measures taken.

Stellantis Technical Compliance Committee has oversight responsibility for vehicle safety, emissions and regulatory issues that may be raised through the Integrity Helpline.

5. Channels

Any concerns or potential violations of the Code **must be reported through one of the available channels: the Integrity Helpline, the direct supervisor, the Human Resources, Compliance or Legal Departments.**

It is the responsibility of supervisors, Human Resources, Compliance or Legal Departments to immediately direct any reports received to the Audit Regional Head.

6. Anonymity, No Retaliation and Data Privacy

The policy permits anonymous reporting, unless local law provides otherwise; however, it is recommended for the reporter to identify themselves. All reports received will be treated confidentially.

Reporting is safe and Stellantis will always protect the reporting person from any kind of retaliation if reported in good faith.

Anyone who retaliates against a person who reports a concern in good faith will be subject to disciplinary action.

A&C, in conjunction with the Stellantis Data Privacy Office, shall ensure that the Integrity Helpline is compliant with applicable data privacy laws. For example, when privacy laws so require, the data subject (i.e. reporting person) will be given the right to update, change or delete their data - any information relating to an identified or identifiable natural person - (hereinafter the "Data") by directing their request to the following addresses:

- All regions: privacyoffice@stellantis.com
- North America: dprivacy@stellantis.com
- South America: privacidade@stellantis.com

7. Case Management

All reports received through any of the available reporting channels will create a **case number** in the Integrity Helpline and will be reviewed by A&C.

A reporter will be able to require information, provide more details or track the progress of a case by accessing the Integrity Helpline (Follow up section).

Confirmation of receipt is provided to the reporter. Furthermore, information concerning the status of the investigation and the final outcome are communicated to the reporter.

8. Case Evaluation and Resolution

Reports will be investigated at regional level by trained investigators or subject matter experts in a manner that maximizes confidentiality relying on the assistance of Human Resources or other relevant groups.

As already detailed in Section 4 above, the Stellantis Regional Ethics and Compliance Committees will be responsible for evaluating and resolving all ethics and compliance cases arising within their respective regions and for escalating salient cases to the Global Ethics and Compliance Committee.

Regional Committees may, however, delegate resolution responsibility to subcommittees or other departments (e.g., Human Resources) as necessary to

achieve an effective and efficient resolution of cases, while continuing to escalate cases to the Global Ethics and Compliance Committee.

The Global Ethics and Compliance Committee is in charge of identifying cases to be escalated to the Stellantis Audit Committee.

The same structure/process is applied to the Stellantis Technical Compliance Committee for concerns regarding vehicle safety, emissions or regulatory compliance.

9. Data retention

Data processed in accordance with this Policy will be retained for the period deemed strictly necessary to fulfil the Policy's purposes, in accordance with local laws.

However, the data may be stored for a longer period of time in cases of potential and/or actual claims or in cases of Stellantis legitimate interests relating to the purpose of this Policy.

10. Disclosure of Conflicts of Interest

The Stellantis workforce is required to disclose, through the Integrity Helpline, actual or potential conflicts of interest, as defined in the Stellantis Code of Conduct, and as set forth in the Stellantis Conflict of Interest Policy. For questions regarding Conflict of Interest disclosures, please refer to the Conflict of Interest Policy.

11. Advice

The workforce can ask questions or seek advice on compliance matters via the Integrity Helpline or to the direct supervisor, Human Resources, Compliance or Legal Departments.

Requests for advice will be reviewed by the Compliance department, relying on the support of other relevant groups.

12. Version history

Version	Approval	Description
V1	December 13, 2021	Initial version
V2	April 22, 2022	Change in the paragraph 5 to specify that reports received by the Supervisors, Human Resources, Compliance or Legal Departments should direct to the Audit Regional Head immediately.