

## Ethics Helpline Procedure

1. Scope. This Ethics Helpline Procedure (the “Procedure”) applies to Fiat Chrysler Automobiles N.V. (the “FCA”) and its majority-owned or controlled subsidiaries (collectively the “FCA Group” or “FCA”).
2. Purpose. FCA is committed to hearing from its full time or part time employees, its contractors (employees and contractors are hereafter referred to as the “**Workforce**”), and business partners, to create a positive working environment and ensure that all levels of the organization comply with the law, the FCA Code of Conduct and FCA policies. In fact, the Workforce is required to report a violation of law, FCA Code of Conduct and FCA policies. Thus, FCA implemented the Ethics Helpline to establish a permanent open channel of communication to serve such groups.
3. Oversight and Management Responsibility. FCA’s Audit and Compliance Department (“**Audit**”) has management responsibility over the Ethics Helpline as well as investigations related to ethics and compliance concerns. Audit reports to the FCA Ethics and Compliance Committee (the “**Committee**”), who has oversight responsibility for the Ethics Helpline. FCA’s Technical Compliance Committee has oversight responsibility for vehicle safety, emissions and regulatory issues that may be expressed through the Ethics Helpline.
4. Channels, Reports. The Ethics Helpline is available by phone or internet at [www.ethicshelpline.fcagroup.com](http://www.ethicshelpline.fcagroup.com). Both web and phone access are available in multiple languages. People making a report to the Ethics Helpline (“**Reporters**”) may:
  - a. report potential violations of law, regulation, the FCA Code of Conduct, or FCA Policies;
  - b. ask questions or seek advice regarding the interpretation of law, regulation, the FCA Code of Conduct, or FCA Policies;
  - c. disclose actual or potential conflicts of interest; or
  - d. express any concern with any aspect of vehicle safety, emissions and regulatory issues

If employees are approached about a situation involving ethical misconduct, we expect that the employee will take immediate action to address the issue. It is important that employees understand the essence of the Code and are able to comfortably respond to day to day questions. If employees are asked to interpret or apply the Code or any of the associated laws or regulations, and are uncertain how to respond, they should immediately escalate the matter by contacting any of the individuals or groups provided in the Code of Conduct’s “FCA Group’s Worldwide Ethics and Compliance Contact List”. Under no circumstance should employees independently investigate suspected or known violations of the code.

5. Anonymous, No Retaliation. Anonymity, confidentiality and non-retaliation are the cornerstones of the Ethics Helpline. Where the law allows, a Reporter may make a report

through the Ethics Helpline anonymously, if desired. Where Reporters do not seek anonymity, their identity will be treated confidentially. FCA does not allow any retaliation against a Reporter who makes a report in good faith, even if the report is later found not to be correct or accurate. Where required by data privacy laws, the data subject (i.e. Reporter or the subject of an investigation) 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:

- a. for all countries, excluding North America, [privacyoffice@fcagroup.com](mailto:privacyoffice@fcagroup.com);
- b. for North America: [dprivacy@fcagroup.com](mailto:dprivacy@fcagroup.com).

6. Case Management. Every report to the Ethics Helpline will create a case number. All cases will be appropriately analyzed and/or investigated until their conclusion. A Reporter will be able to require information, provide more details or track the progress of a case by accessing the Ethics Helpline portal.

7. Case Evaluation and Resolution. FCA’s Regional Ethics and Compliance Committees will be responsible for evaluating the resolution of all ethics and compliance cases arising within their respective regions, relying on the assistance of Audit, human resources, or other relevant groups, and for elevating to the Committee cases that are of material importance to the FCA Group. FCA’s Regional Technical Compliance Committees will evaluate and resolve vehicle safety, emissions and regulatory cases arising within their respective regions, relying on vehicle safety personnel or other relevant groups, and elevating cases that are of material importance to FCA’s Technical Compliance Committee.

8. Data Retention. The Data processed in accordance with this Procedure will be retained for the period deemed strictly necessary to fulfil the Procedure’s purposes. However, the Data might be stored for a longer period of time in case of potential and/or actual claims or in case of FCA Group legitimate interests relating to the Procedure’s purposes.

9. Disclosure of Conflicts of Interest. A Workforce member must disclose a potential or actual conflict of interest, as defined in FCA’s Code of Conduct, through the Ethics Helpline. Such conflicts typically include activities or interests that compromise the interests of FCA, either because they interfere with the performance of work-related duties, or because they compromise objective business decision-making. Unless otherwise determined by the Chief Human Resources Officer, disclosures will be reviewed by the HR department, with the exception of disclosures of material importance or which involve HR representatives. Such disclosures will be directly evaluated by the Regional Ethics and Compliance Committees.