

Anti-Corruption Policy

Version V1

Date of approval: December 13, 2021

Stellantis is committed to the highest level of integrity in the marketplace and in its interactions with government personnel.

Stellantis workforce must refuse all forms of corruption whether private or public. It is strictly forbidden to offer, promise or give any gifts, payments or anything of value, directly or through third parties, with the purpose of causing officials and business partners to act in violation of his or her duties and grant the Company any improper benefit or advantage.

Transparency is the golden rule.

Table of contents

1.	INTRODUCTION.....	3
1.1.	PURPOSE.....	3
1.2.	SCOPE.....	3
1.3.	SUPERSEDED DOCUMENTS.....	3
1.4.	DEFINITIONS.....	3
2.	ROLES AND RESPONSIBILITIES.....	4
3.	REQUIREMENTS.....	5
4.	TRANSPARENCY.....	6
5.	AWARENESS AND TRAINING.....	6
6.	CONSEQUENCES OF NON-COMPLIANCE.....	6
7.	REQUEST FOR ADVICE AND REPORTING POTENTIAL VIOLATIONS.....	6
8.	VERSION HISTORY.....	6

1. Introduction

1.1. Purpose

This Anti-corruption Policy (“the Policy”) sets the standards to be followed by the Stellantis workforce to prevent any form of corruption at Stellantis.

1.2. Scope

The Policy applies to all the Stellantis workforce, as defined in the Stellantis Code, including all individuals who work for Stellantis anywhere in the world: full-time or part-time employees, temporary workers, contract workers, officers and the members of the Stellantis Board of Directors. We also expect our business partners including suppliers, dealers, distributors, intermediaries and Joint Venture partners, to act with integrity and in keeping with the spirit of this Policy.

1.3. Superseded documents

This Policy replaces the following former Fiat Chrysler Automobile (FCA) and former Groupe PSA (PSA) documents:

- FCA Practice: Anti-bribery and Anti-corruption
- FCA Practice: Business Entertainment, Gifts and Meals
- PSA Anti-corruption code

Please note that:

- PSA’s Rule “How to work with intermediaries” is to be replaced by a Stellantis Procedure
- PSA’s “Vehicle loan rules Prevention of corruption” is to be replaced by a Stellantis Procedure
- PSA Support against COVID19 derogation rule AND
- PSA Educational contributions pre-approval process are replaced with the Stellantis Philanthropy policy.

1.4. Definitions

- **Corruption:** a form of dishonesty or a criminal offense which is undertaken by a person or an organization which is entrusted with a position of authority, in order to acquire illicit benefits or abuse power for one's private gain. Proposing an advantage with an improper purpose is already a corruption, even if it was never acted upon. Active corruption consists of offering an advantage. Passive corruption consists of accepting an advantage.

- **Private Corruption:** refers to corruption in the context of commercial business between private parties.
- **Public Corruption:** refers to corruption in the context of interactions between a private business and government officials.
- **Bribery:** act of giving, promising, offering of money, favor or something valuable to a person or authorizing such an act in order to influence the judgment or conduct of that person, procure services, or gain influence. A bribe can be commercial (that involves corrupt dealing with agents or employees of private third parties, such as suppliers or dealers, to secure, supply, or gain an advantage over business competitors) or public (that involves government officials).
- **Facilitation payments:** money provided to government employees whose duties are usually ministerial or clerical to facilitate or expedite a service that the payer is legally entitled to.
- **Government officials:** employees of (a) official government agencies; (b) government owned or controlled businesses or enterprises; and (c) publicly funded organizations such as the United Nations, the European Parliament, Red Cross etc. (local or national). Government officials also include political party officials, candidates for public office and members of royal families when performing governmental functions.

2. Roles and Responsibilities

2.1. Stellantis sets up anti-corruption rules to be followed by the workforce and will provide its workforce advice on interpretation of the rules, as well as, trainings and the means to report misconduct (including Integrity Helpline).

2.2. Stellantis will not tolerate retaliation against anyone who in good faith reports a concern about Stellantis operations.

2.3. Stellantis will support employees who resist paying bribes and will forego contracts, sales or other business advantages to ensure compliance with anti-corruption laws and this Policy.

2.4. It is the responsibility of each Stellantis workforce member to read, understand, and comply with this Policy, and to complete any required anti-bribery and corruption training, as prescribed, in a timely manner.

2.5. Workforce is required to act with transparency, avoid any activities that could lead to, or imply, a breach of this Policy. If you have reason to believe or suspect that an act of corruption has occurred or will occur in the future, you must report it as provided in Section 7 below.

2.6. The Stellantis workforce must abstain from offering, promising or giving gifts to Government officials and external partners in a manner that would constitute bribery or corruption (see definition above). If you are in doubt as to whether any proposed course of action may constitute corruption, you must contact the

Compliance Department before you act. Corruption of any kind will not be tolerated and will result in disciplinary action, up to and including termination.

2.7. A workforce member may not do indirectly what the member may not do directly. Accordingly, the prohibition of the previous section (2.6) extends to any attempt to offer, promise or give an improper gift through third parties such as agents or anyone acting on behalf of Stellantis. Knowing the business partners you are dealing with and recognizing signs of corruption can help to stay compliant with the Stellantis ethical standards.

2.8. When on boarding third parties, the relevant business function must ensure third parties are made aware of this Policy and any related procedures.

3. Requirements

3.1. Stellantis prohibits Corruption, both Public or Private.

3.2 It is strictly forbidden to offer, promise or give any gifts, payments or anything of value to a government official, directly or through third parties, with the purpose of causing the official to act in violation of his or her duties and grant the Company any improper benefit or advantage.

3.3. All of the workforce members must ensure that any gifts or invitations they give out are given in a manner that would not improperly influence the judgement or the conduct of any external party. For detailed guideline, see Gift giving and receiving Procedure.

3.4. Stellantis also prohibits the receiving of gifts, invitations, advantages or payments between private parties according to the requirements specified in the Gift giving and receiving Procedure.

3.5. Stellantis prohibits Facilitating payments whether directly made by Stellantis or indirectly through an intermediary.

3.6. All interactions with unions or their leadership must be ethical, transparent and in compliance with the applicable collective bargaining agreement, labor law, and this Policy.

3.7. It is workforce members' responsibility when interacting with a Government official, to ensure compliance with The Code of conduct and the Anti-corruption Policy. Any Stellantis participation in the development of future regulations and standards applicable to the entire automotive industry is conducted in a manner that guarantees transparency and compliance with the law. No company funds or assets may be used for contributions to any political party or candidate.

3.8. Charitable donations may be considered as a Bribe if it is given or received with the intention of influencing someone to act improperly, or as a reward for having acted improperly. Consult the dedicated Stellantis policy before giving or promising.

3.9. Corruption often starts with a conflict of interest. A conflict of interest exists where one abuses his or her position for private gain. Stellantis requires its workforce to declare a conflict of interest as provided by the Conflict of interest Policy.

4. Transparency

Every workforce member is responsible for accurately maintaining and reporting records of expenditures relating to gifts or travel in accordance with the applicable procedures. If a payment or other transaction is not reflected in Stellantis's records in a manner that accurately and transparently reflects the nature and purpose of the payment or other transaction, that inaccurate record may be a violation of the law.

5. Awareness and Training

Stellantis will provide training on this Policy as part of the induction process for all new hires. Workforce members will also receive periodic training on this Policy, and will be asked to formally certify that they are in compliance with this Policy.

6. Consequences of non-compliance

Failure to comply with this Policy may, in accordance with the severity or frequency of such a breach, result in heavy sanctions and potential criminal liability for the company, management, and the workforce involved. In addition, personnel involved in the non-compliance are subject to disciplinary sanctions up to and including dismissal.

7. Request for advice and reporting potential violations

If you have any doubt or if you suspect that a transaction might involve corrupt payments, immediately report this to the Compliance Department, your direct superior or via the Integrity Helpline. The whistleblowing system offers reporters strong protection and confidentiality.

8. Version history

Version	Approval	Description
V1	December 13, 2021	Initial version