

Global Responsible Purchasing Guidelines

Foreword

The group Stellantis (“Stellantis”) considers collaboration with the supply chain an integral part of its success and, therefore, strives to operate as an integrated team with suppliers. The selection of suppliers is based not only on the quality and on competitiveness of their products and services, but also their adherence to social, ethical and environmental principles. By signing below, you acknowledge your understanding that you have not yet been appointed as a supplier to Stellantis, but that your agreement to comply with these Guidelines is a prerequisite to becoming a supplier (a “Supplier”) and developing a lasting business relationship with Stellantis or its affiliates.

Stellantis takes the 2030 United Nations Sustainable Development Goals as a framework for our actions in the transition to a more sustainable future.

Stellantis commits to contributing to a decarbonized economy by engaging our talents and assets on our road to carbon neutrality across our products, plants and other facilities. Stellantis is strongly involved in environmental issues (greenhouse gas and pollutant emissions, recycling, the use of natural resources, circular economy, etc.) and expects not only a support from suppliers along the entire lifecycle of a vehicle but also innovative proposals contributing to our ambitions announced publicly.

Stellantis regards the principles of the Global Compact and International Labor Organization conventions as key elements in the development of its purchasing policy and undertakes to consider the objectives of the OECD Guidelines for Multinational Enterprises adopted in 2011 as well as the Guiding Principles on Business and Human Rights (“Ruggie Principles”) approved in 2011 by the United Nations Human Rights Council.

The Supplier selection and retention in the Stellantis Supplier panel are guided by corporate and social responsibility (CSR) criteria

- *Assessing, Monitoring and Remedial Actions*

The Supplier social and environmental performance is regularly assessed by a third party. This assessment covers, amongst others, the following topics:

environment, labor practices, working conditions, business ethics and sustainable procurement. This assessment is used for the risk identification and for the selection of sites to be audited. Each supplier assessed receives a scorecard covering all relevant aspects of the evaluation.

In the event of non-compliance of the principles set forth in these Guidelines:

- the non-compliance will be considered a material breach that may justify termination under the applicable terms and conditions of purchase;
- Stellantis shall require that Suppliers implement an action plan to put in place corrective actions to bring their performance into line and shall provide Suppliers technical support to jointly define the required remedies;
- Stellantis reserves the right to conduct a follow up audit to verify implementation of the planned remedial actions. If such remedial actions are not implemented, Stellantis reserves the right to early terminate the business relationship.

- *Reporting Non Compliance to Stellantis*

Stellantis’ Suppliers must report any non-compliance with these guidelines to Stellantis. The preferred method for reporting non-compliance is the Stellantis Ethics Helpline, which is available to employees and business partners worldwide, via telephone or web. Web access is available at the following link:

www.integrityhelpline.stellantis.com

Compliance with social principles

- *Support and respect the protection of internationally-proclaimed human rights*

The Supplier respects human rights in all countries in which it operates, including in geographical areas where human rights may not yet be sufficiently protected.

The Supplier agrees to work towards preventing situations of complicity or acts of collusion concerning fundamental human rights violations.

The Supplier pledges its commitment to fulfill its responsibility toward respecting human rights and promotes their respect throughout its entire supply chain.

- *Uphold freedom of association and the effective recognition of the right to collective bargaining*

The Supplier shall: (i) support its workforce's freedom of association and the right to be represented by trade unions or other representatives, in accordance with applicable local legislation and consistent with the spirit underlying the ILO recommendations (ILO Convention 87); and (ii) abstain from forms of anti-union activity that are not consistent with local legislation. The supplier is committed to good faith collective bargaining, a key aspect of relations between labor and management (ILO Convention 98).

- *Eliminate all forms of forced labor and child labor*

No form of labor practice involving forced, compulsory or child labor is tolerated. The Supplier recognizes the principle of the freedom of choice of employment. Labour is deemed to be forced or compulsory when it is imposed by means of a threat (withholding of food, confiscation of land, non-payment of salary, physical violence, sexual abuse, or non-voluntary prison labor, etc.) (ILO Conventions 29 and 105).

The Supplier is prohibited from employing children in violation of the stipulations of the International Labour Organization's conventions (ILO Convention 138 and 182).

- *Eliminate discrimination in respect of employment and occupation*

Supplier's employees must be treated in a fair and non-discriminatory manner, with the guarantee of equal opportunity and the absence of any policy aimed at, or indirectly resulting in, discrimination toward them on any basis prohibited by law, including, as applicable, but not limited to, race, gender, sexual orientation health condition, disability, age, nationality, or religion (in accordance with applicable laws and regulations and consistent with the spirit underlying ILO Convention 111).

- *Remuneration*

The Supplier is committed to ensuring that remuneration is at least equal to the minimum amount mandated by applicable laws and regulations (and legally guaranteed minimum for a profession, if any) or as set forth in the relevant collective bargaining agreements. The Supplier is committed to the principle

that its compensation should seek to provide its workers and their families decent wages to afford reasonable and adequate shelter, food and other necessities.

The Supplier acknowledges the principle of equal pay for equally valued and productive work, in particular between men and women (ILO Convention 100).

- *Working hours*

The Supplier is committed to ensure that: (i) working hours and compensation must be fair and comply with applicable laws, regulations, standards, collective bargaining and practices applicable in those countries where it operates; and (ii) break times and periodic days off correspond at the very least to the minimum requirements of applicable law.

- *Respect for health and safety at work*

Stellantis strives for an accident-free workplace. The Supplier is committed to ensuring that effective occupational health and safety policies consistent with applicable laws and regulations and based on prevention are applied at its various sites in the form of concrete action plans that involve each employee at their level of responsibility in the company, including labour and management representatives (ILO Convention 155).

Environmental protection

- *System of environmental quality management*

To minimize the impact of production processes and products on the environment, Suppliers should: (i) make every effort to optimize the use of resources and minimize pollution and greenhouse gas ("GHG") emissions; (ii) design and develop products taking into account the impact they have on the environment and the potential to reduce, re-use and recycle them; (iii) properly manage, in compliance with any applicable laws, air emissions, water discharges, and waste treatment and disposal; (iv) avoid the use of potentially dangerous substances (as defined by current legislation); and (v) apply a logistics management that takes environmental impacts into consideration.

The Supplier must have an Environmental Management System (EMS) that complies with local law. Certification of the EMS according to international standards (i.e. ISO14001, EMAS or equivalent) is strongly recommended for manufacturing processes of large scale or having a significant influence on the environment

- *Research and environmental policy*

Stellantis endeavors to research and promote innovative technical solutions contributing toward lowering the environmental impact of the vehicles it manufactures. Consequently, the Supplier is committed to adopting a policy in the field of research in order to develop its products and bring them up to a still higher standard in terms of respect for the environment.

The Supplier is committed to meet the commitment of Stellantis to green materials by proposing solutions integrating recycled materials and / or materials of natural origin. Moreover, it is committed to contributing to the objective of recyclability of vehicles through its material proposals. The Supplier must produce a complete material itemization of his goods.

The Supplier undertakes to implement a policy to reduce GHG emissions in order to contribute to Stellantis commitments made in line with the Paris agreement. To this end, it will communicate each year to Stellantis the GHG emissions related in particular to the production, upstream and downstream transport of the goods and services purchased by Stellantis.

Compliance with ethical principles

- *Prohibited substances and materials*

The supplies, products or goods bought from the Supplier by Stellantis, whether they are standard or specifically developed by the Supplier for Stellantis, must respect legislations or regulations applicable in the production countries and the areas/ countries where the product is sold or used (European Union, etc.), including laws and regulations that require traceability of substances of concern for the protection of health or the environment.

- *Fight against the use of conflict minerals*

Stellantis intends to exercise its duty of vigilance and participate in the development of responsible procurement.

Stellantis' policy is to establish transparency with Suppliers on the origin of minerals used in particular from conflict affected and high risk areas (CAHRA) (including but not limited to, tungsten, tantalum, tin and gold known as "3TG"). The Supplier will refer to any recommendation from the legislators about the extension of the list of materials or risk areas

The Supplier undertakes to submit in writing the results of efforts that comply with legally applicable standards regarding:

- the detailed composition of the materials used in the manufacturing of the goods supplied as well as any changes in this composition;
- any information necessary to comply with the enforced legislation (Dodd Frank Act, EU conflict mineral regulation) via the latest version of the CMRT form;
- the smelter from whom where raw materials are supplied either directly or through subcontractors.

The Supplier will: (i) make reasonable efforts, and no less than required by law, to achieve compliance in its operations, to support Stellantis' commitment to use risk identification analysis to support prioritizing the origin tracing activities for additional materials and work to implement processes and tools to reach this objective; and (ii) undertake remedial measures that Stellantis deems adequate to cease sourcing from channels that are determined to be non-compliant.

- *Animal Welfare*

As part of its supply, the Supplier undertakes to respect and to ensure that its own suppliers respect the five animal rights formalized by the World Organization for Animal Health (OIE) concerning animal welfare.

- *Export Controls*

Supplier agrees to become knowledgeable of and comply with all applicable export control and sanctions laws and regulations, including those of the EU, the United States and any other applicable jurisdiction (the "Export Control & Sanctions Laws"). Supplier will not violate, and will not cause Stellantis to violate, any Export Control & Sanctions Laws (e.g. by transshipping goods through, or supplying goods or services from, sanctioned countries, or with the assistance of any individuals or entities appearing in export-restricted or sanctions lists). Supplier is aware of the constant change of countries, entities and persons mentioned in export-restricted and sanctions lists and has taken steps to keep up to date with such changes.

With respect to the goods or technology that Supplier sells or licenses to Stellantis, Supplier will provide to Stellantis the information necessary to ensure compliance with Export Control & Sanctions Laws, including any potential military use or military end-user of such goods, Export Control Classification Number (ECCN), percent (%) of U.S. content, or if requested, of other country or regional content prior to the sale or Supplier's start of real production ("SORP"), whichever is

earlier. Licenses or other authorizations required for the export of goods or services, or to conduct business in sanctioned countries or with sanctioned entities or persons, will be the responsibility of Supplier unless otherwise agreed in the contract entered into with Stellantis, in which event Supplier shall provide all necessary information as may be requested by Stellantis to request such licenses or authorizations.

Compliance with Laws

Stellantis expects its Suppliers to be fully compliant with all laws and regulations applicable in the countries in which they operate.

- *Fair trade practices*

If not specifically covered under the terms and conditions applicable to Supplier's sale of goods or services to Stellantis, contracts, purchase orders or other contractual instruments, the Supplier agrees to conduct the following activities.

The Supplier agrees to comply with all applicable anti-corruption laws, including, without limitation, the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act and the French Loi Sapin 2. Accordingly, the Supplier will not engage in any form of commercial bribery, nor directly or indirectly provide or offer to provide, anything of value to or for the benefit of, any official or employee of a governmental authority or of any government-owned, government-controlled or government-affiliated entity to induce such person(s) to violate their official duties in order to grant the Supplier any benefit, including obtaining or retaining any contract, business opportunity or other business benefit. Supplier will adopt appropriate measures to promote similar compliance amongst its subcontractors, vendors, agents or other associated third parties.

The Supplier agrees to know about and comply with any applicable rule relating to competition, and will implement any anti-competitive practices (cartels, etc). The Supplier must independently determine its behavior and its commercial policy on the market in order to maintain healthy competition between all players. The Supplier undertakes to have processes to prevent, detect and remediate any conflict of interest, especially any conflict of interest that may influence its business with Stellantis.

The Supplier undertakes to respond diligently and transparently to requests for information from Stellantis, whether financial or non-financial.

The Supplier will apply appropriate protections for the confidential information it receives from Stellantis, consistently with non-disclosure agreements, terms and conditions or contractual requirements that Stellantis may require for that purpose. The Supplier will also respect the intellectual property rights of other parties.

The Supplier will prohibit any activity that facilitates the production or trade of counterfeit products or components throughout its supply chain, and will cooperate with Stellantis in any investigation related to suspected counterfeit activity.

The Supplier will prohibit any activity that facilitates money laundering or the funding of terrorist or other criminal activities.

- *Retention and use of personal data*

The Supplier undertakes to comply with the regulations in force concerning the collection and use of personal data. No use and treatment other than those provided for in the contracts and applicable laws and regulations may be implemented by the Supplier.

Training & support to small and local suppliers

- *Training and development*

The Supplier undertakes to provide appropriate tools for the development of skills and capabilities have to all its employees. Through the offer of technical support, Stellantis encourages Suppliers to establish training programs for their employees to enhance the level of their professional skills.

Lay-off practices. In dealing with redundancies, Supplier's responsible behavior is expected so that, where possible and within the applicable legal framework, the effects are mitigated. Each employee affected is to receive appropriate information and assistance in line with local legislation.

- *Support of small and local suppliers*

In specific circumstances, Stellantis is also committed to supporting small and local suppliers, helping to facilitate technological upgrades and acquisition of long-term assets.

