



## Human Rights Policy

Version V2  
Date of approval: December 8th, 2022

We endorse, among other declarations, the United Nations (“UN”) declaration on human rights and the International Labor Organization declaration on fundamental principles and rights at work. We expect our workforce to be respectful in all their professional interactions with co-workers, customers, visitors and other business partners. Appropriate discipline will be taken whenever a violation occurs.

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## 1. Purpose

Stellantis is firmly committed to respect and support human rights in all of our activities, in all of the countries in which we operate. Stellantis pledges its commitment to respecting human rights throughout its entire supply chain detailed in the Responsible Purchasing Guidelines. As stated in the Duty of Vigilance report, Stellantis requests its suppliers, contractors and other business partners and stakeholders with whom it does business to commit to integrating the same or similar principles within their own policies and operations.

Our approach is compliant with the spirit and intent of the United Nations Guiding Principles, United Nations Universal Declaration of Human Rights, United Nations Sustainable Development Goals, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Companies, the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO), the United Nations Guiding Principles on Business and Human Rights and the Modern Slavery Act 2015 with respect for the human rights, fundamental freedoms, democratic principles and standards established in the International Bill of Human Rights.

## 2. Scope

In support of its commitments to human rights, Stellantis seeks to apply standards that protect our workers, enhance our integrity across the organization and provide effective grievance mechanisms to employees and stakeholders. Human Rights are the foundation of our diversity and inclusion policy, and we don't tolerate any harassment or discrimination based on differences, including, but not limited to race, ethnicity, gender, sexual orientation, age, marital status, parental status, religion, political opinions, trade union activities, national origin, disability status, genetic information or any other basis protected by applicable law.

Stellantis expects the commitment of our suppliers, contractors and other business partners with whom we do business, to adopt standards in line with internationally accepted principles regarding human rights, labor practices, occupational health and safety, and other measures that contribute to an overall improvement in occupational health and safety performance throughout the value chain. This expectation is set out in Stellantis [Responsible Purchasing Guidelines](#).

Stellantis' employees are asked to behave in a socially responsible manner by respecting the rights of local communities and indigenous people including their cultures and traditions in each country in which Stellantis operates and by acting with integrity and good faith in order to merit the trust of the community.

### 3. Definitions

	Definition
United Nations Guiding Principles	A set of guidelines for States and companies to prevent and address human rights abuses committed in business operations.
United Nations Universal Declaration of Human Rights	It is a milestone document in the history of human rights. Drafted by representatives with different legal and cultural backgrounds from all regions of the world,
United Nations Sustainable Development Goals	Stellantis takes the 2030 United Nations Sustainable Development Goals as a framework for our actions in the transition to a more sustainable future.
Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Companies	This report covers the activities undertaken to promote the effective implementation of the Guidelines by the OECD, adhering governments and their National Contact Points from July 2014 to December 2015.
Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO)	Adopted in 1998 and amended in 2022, it is an expression of commitment by governments, employers' and workers' organizations to uphold basic human values - values that are vital to our social and economic lives.
United Nations Guiding Principles on Business and Human Rights	Apply to all States and to all business enterprises, both transnational and others, regardless of their size, sector, location, ownership and structure.
Modern Slavery Act 2015	An Act that gives law enforcement the tools to fight modern slavery, ensure perpetrators can receive suitably severe punishments for these appalling crimes and enhance support and protection for victims.
International Bill of Human Rights	Consists of the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights and its two Optional Protocols.
ILO-OSH 2001	It is the only international standard adopted by the State, employers and employees. It contains concrete recommendations to implement and improve your occupational health and safety management system.

## 4. Roles and Responsibilities

The Stellantis Code of Conduct and Stellantis Corporate Social Responsibility report detail standards for ethical behavior and how Stellantis conducts business respecting the human rights principles, guidance and goals noted above.

- a. **Right to privacy and employee personal data protection.** Stellantis is committed to respecting and protecting the privacy rights of our employees, customers, business partners and other persons or entities with whom Stellantis does business, and to establishing appropriate controls to safeguard personal data.
- b. **Anticorruption.** Stellantis is a strong advocate against corruption and supports the prevention of conflict of interests. Corruption is one of the root causes of human rights violations and unequal treatment that Stellantis will not tolerate under any circumstances.
- c. **Respect for the individual.** At Stellantis, all employees are treated equally, with respect for their rights and dignity. Stellantis protects employees against human rights violations, by fostering a diverse and inclusive global policy with **non-discrimination** in employment and equal pay, e.g., between women and men. Around the world, Stellantis strives to ensure **equal** employment opportunities for employees based on merit in accordance with applicable laws. Stellantis actively commits itself to improving gender balance, providing women with access to more opportunities, ensuring professional equality for all employees and preventing sexism and all forms of violence.
- d. Stellantis **does not tolerate any form of labor practice involving forced, compulsory or child labor.** The Company expects its stakeholders to commit to adopting policies against the use of all forms of child labor, forced labor, modern slavery and **human trafficking**.
- e. Stellantis recognizes the importance of a workplace based on mutual respect and dignity of the human being to prevent violence and harassment. The Company practices an environment of **zero tolerance of violence and harassment in the workplace**.
- f. **Workers' rights.** Stellantis seeks to adopt standards that protect its employees and is committed to observing all applicable employment, wage, and working hours' laws; honoring our collective labor agreements; and offering compensation and benefits to all members of our workforce in **a fair, decent, objective and equitable manner** in full respect of local legislation. Stellantis offers benefit plans to cover risks related to death, disability, and health care. Stellantis undertakes to keep **working hours equal to or less than**

**the maximum hours allowed by law**, and to respect rest time and periodic vacations corresponding at least to the conditions established by the applicable legislation or by collective bargaining agreements of the countries affected. Stellantis ensures the availability of employee training and skills development during their time with the Company.

- g. Stellantis respects workforce members' **freedom of association and right to collective bargaining**. Employees are free to choose to join any trade union in accordance with local and applicable laws. Stellantis recognizes and respects the rights of employees to be represented by trade unions or other representatives established in accordance with the applicable legislation and practice. When engaging in negotiations with such representatives, Stellantis seeks a co-constructive approach and a respectful relationship. Where the right of freedom of association and collective bargaining is restricted, we seek ways to have a dialogue with employee representatives, without breaking local law.
- h. **Stellantis Occupational Health and Safety Policy** supports the ILO recommendations, such as ILO-OSH 2001, and fulfills its obligations in all countries. Continuous improvement in working conditions is ensured through the appropriate identification and assessment of risks, the definition and implementation of preventive and corrective action plans, if appropriate, and continuous monitoring of occupational health and safety. The levers of wellbeing and motivation at work are based particularly on the proper health care, human relations within the Company, professional development, and working conditions. A safe work environment means not only preventing injuries and occupational diseases, but also improving the working environment and workplace conditions. Stellantis supports the wellbeing of each of its employees through a dedicated "We All Care" Program that focuses on the **physical, social, professional, emotional, and financial** aspects of our employees' wellbeing. Stellantis pays particular attention to availability of water, sanitation and hygienic (WASH) conditions for employees as they are crucial for a minimum level of wellbeing.

## 5. Requirements

Our due diligence processes include actions to safeguard against human rights abuses in any part of Stellantis' business and in its supply chain. As part of our initiative to internally identify and mitigate any related risks, the following tools have been developed to be aligned with the five steps defined in the Duty of Diligence report:

1. Stellantis performs a global risk mapping to identify the entities that represent the highest risk to the Company from a compliance and reputational perspective, including from the perspective of human rights compliance, and has a structured due diligence program to obtain information regarding those entities that are deemed to constitute the highest risk. Any adverse information is provided to the business function that has operational responsibility, and mitigation steps are undertaken in conjunction with such entity, when necessary.
2. The Audit and Compliance Department performs an annual audit of compliance with this Policy and actions taken to prevent any deviations, as well as investigating any allegations or violations.
3. As a baseline prevention measure Stellantis rolls out a mandatory training on human rights.
4. The Stellantis Code of Conduct informs employees of their responsibility to report any violations of the Code that they become aware of, which would include any violations of human rights. Employees may, at their election, report a concern to their immediate supervisor, Human Resources representatives, the Compliance or Legal Departments or via a dedicated channel called the Integrity Helpline. Anonymous reporting is possible where allowed by local law. The Integrity Helpline provides a common, worldwide, and independent intake via telephone at local numbers and web. Web access is available at <http://www.integrityhelpline.stellantis.com>

Reports to the Integrity Helpline are tracked, investigated when appropriate by trained investigators, adjudicated, and reported to appropriate Ethics and Compliance Committees. Stellantis does not tolerate any retaliation against a person or member of our workforce who reports an issue in good faith. The Company protects employees reporting cases of unethical behavior or non-compliance with the principles of the Code of Conduct as well as the confidentiality of the provided data in accordance with its whistleblowing and non-retaliation policy.

5. Stellantis' "Always with Integrity" approach means zero-tolerance for non-compliance with applicable laws and violations of human rights. If confirmed, a violation of human rights would result in discipline proportional to the gravity of the violation, up to and including termination. Remediation takes place commensurate with the action. The respective management is responsible for implementing action plans and the Compliance Champions Network verifies such implementations.

## 6. Awareness and Training

Respect for human rights is a fundamental requirement that applies in every department and every function in the Company. No circumstance justifies disregarding this Policy. Involving Stellantis workforce in the implementation of this Policy is a critical factor in the Company's success, as responsibility for continuous improvement of working conditions and respect of fundamental rights rests with the entire Stellantis workforce. To do so, relevant communications regarding these principles are provided to employees, the employees' representatives and other stakeholders.

As a baseline prevention measure Stellantis rolls out a mandatory training on human rights.

## 7. Consequences of non-compliance

Stellantis' "Always with Integrity" approach means zero-tolerance for non-compliance with applicable laws and violations of human rights. If confirmed, a violation of human rights would result in discipline proportional to the gravity of the violation, up to and including termination. Remediation takes place commensurate with the action. The respective management is responsible for implementing action plans and the Compliance Champions Network verifies such implementations.

## 8. Request for advice and reporting potential violations

The Stellantis Code of Conduct informs employees of their responsibility to report any violations of the Code that they become aware of, which would include any violations of human rights. Employees may, at their election, report a concern to their immediate supervisor, Human Resources representatives, the Compliance or Legal Departments or via a dedicated channel called the Integrity Helpline. Anonymous reporting is possible where allowed by local law. The Integrity Helpline provides a common, worldwide, and independent intake via telephone at local numbers and web.

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## 9. Reference documents

Stellantis Code of Conduct  
Global Responsible Purchasing Guidelines  
Stellantis - 2021 Vigilance Plan  
Integrity Helpline - Whistleblowing Policy  
Anti-Retaliation Procedure  
[www.integrityhelpline.stellantis.com](http://www.integrityhelpline.stellantis.com)

## 10. Version history

Version	Approval	Description
V1	November 07, 2022	Initial version
V2	December 08, 2022	Update on paragraph 2 Scope