



ALWAYS
WITH
INTEGRITY

CODE OF CONDUCT
February 2024

**“TOGETHER,
OUR CODE OF CONDUCT
ALONG WITH
THE TRANSPARENCY
AND ACCOUNTABILITY
OF OUR EMPLOYEES
EARN THE TRUST OF
ALL OUR STAKEHOLDERS.”**

John Elkann
Chairman



A Message from our Chairman



When Stellantis was founded in January 2021, we reviewed the standards of behavior by which we would act and hold each other accountable. One of the first things we did was define our Purpose: “Powered by our diversity, we lead the way the world moves.” Then, we created the four Stellantis Values that have carried over to our Dare Forward 2030 strategic plan: “We Are Customer Centric, We Win Together, We Are Agile & Innovative, We Care for the Future.”

Stellantis employees are the most visible representation of all our values. Whether it's how we engage with each other or our external stakeholder network, our actions directly impact the reputation and credibility of our Company.

Our Code of Conduct provides guidance on what is expected of each of us and reflects our commitment to a culture dedicated to integrity, responsibility, and ethical behavior in all areas of our business and along the entire value chain, complying with applicable laws, regulations, and policies.

Together, our Code of Conduct along with the transparency and accountability of our employees earn the trust of all our stakeholders. That's why we must all know and apply the rules.

It is your responsibility to speak up when you observe conduct that is inconsistent with Stellantis' Code of Conduct. There should be no doubt that the reporting of concerns is safe. The Company will always protect you from any kind of retaliation if you report matters in good faith. We owe Stellantis exemplary behavior because we are the guardians of our Company's reputation.

By supporting this commitment, you ensure that together we can honor our Dare Forward 2030 strategic plan and continue our transformation to a sustainable mobility tech company.

Compliance is not an option; it is imperative. Whatever we do, we always do it with integrity. We rely on each one of you to apply the Code with integrity every day.

Thank you.

John Elkann
Chairman



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Why do we have a Code of Conduct?

Welcome to our Code of Conduct. At Stellantis integrity is essential to our business. Our Code of Conduct expresses this vision to our employees, business partners and all other stakeholders. The Code reflects the core values to inspire us to do the right thing in all circumstances. Detailed guidance on how the Code applies in specific situations will appear in the Principles that follow and related Company policies and procedures.



The Code of Conduct and all related documents are available in the “**Code of Conduct and Ethics**” area in **The Hub, the Company intranet**.

The Code applies to our workforce, which includes for the purpose of this Code all individuals who work for us 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 stakeholders, including suppliers, dealers, distributors, and Joint Venture partners, to act with integrity and in accordance with our Code, and in some cases we may require express adoption of our Code.



What are our Responsibilities?

As a Stellantis employee

Be Informed, Understand and Adhere

- Carefully read the Code of Conduct and any other Company policies and procedures that relate to your job responsibilities.
- Comply with the Code in any setting that may affect the Company, either at work or outside working hours (e.g., conduct on social media).

Be Responsible

- Complete the training courses prepared for you and confirm your understanding of, and adherence to the Code.
- Speak up and report any conduct inconsistent with our principles without fear of retaliation.

Be Compliant

- Violations of the law, this Code or any other Company policies and procedures may result in disciplinary action up to and including termination of employment.

As a Stellantis supervisor

Be Exemplary and Lead by Example

- Make sure your team knows and understands the Code.
- Encourage your team to comply with the Code on a permanent basis and in all circumstances.
- Foster and maintain a culture of integrity in the objectives and activities of your team.
- Report any misconduct of which you are aware.

Be the One who Sets the Tone

- Openly discuss the importance of business ethics and integrity.
- Listen without expressing any judgement when an employee in your team has a concern.
- Provide your team your support and encourage them to report any violations of the Code.
- Immediately direct to the Audit Regional Head any reports received.

How does the Code Fit with the Law?

At Stellantis we are committed to comply with applicable laws. This is fundamental to the way we do business and is not negotiable. In some cases, our Code may require that we do more than what the law requires. In such cases, we expect our workforce to comply with the more stringent standard set forth by the Code.

When to Report Code Violations and What Happens Next?

If you have questions about the Code, or become aware of a potential violation of the Code, or have any other concerns including Vehicle Safety, Emissions and Regulatory Compliance, or any conduct that is inconsistent with our standards, you can report your questions or concerns through the [Integrity Helpline](#) or speak to your direct supervisor, Human Resources, Compliance or Legal Departments. It's your responsibility to report suspected or potential violations of the Code.

Employees and stakeholders can contact the [Integrity Helpline](#) alternatively by phone, via web or by [scanning QRCode](#).
➤ It's also available for the Stellantis workforce members in the "Code of Conduct and Ethics" area in The Hub, the Company intranet, and in the [Stellantis corporate website](#).



Through our internal controls and with the services of specialized, independent service providers, our [Integrity Helpline](#) is designed to protect the confidentiality of who makes a report. Reports may be made anonymously unless local law provides otherwise.

Reports will be investigated as appropriate by trained investigators or subject matter experts in a manner that maximizes confidentiality. No other personnel, including supervisors, should conduct this kind of independent investigations.

All reported cases will be tracked until their completion. We will apply corrective actions to confirmed violations of the Code.

At Stellantis we do not allow any retaliation against any person who makes a report in good faith, or who cooperates in an investigation. Anyone who retaliates against a person who reports a concern in good faith will be subject to disciplinary action.



How Is the Code Enforced?

We expect our workforce to do the right thing and comply with the Code. Where we confirm a violation of the Code, we will take steps to apply the appropriate disciplinary measures that could include termination of employment or business relationships.

If you are not sure about what your compliance obligations may be in a particular situation, contact your direct supervisor, Human Resources, Compliance or Legal Departments, or ask your question through the [Integrity Helpline](#). Preventive guidance could protect you and the Company.

How is the Code Changed?

Changes to the Code require the approval of the Stellantis Board of Directors. The Code was first adopted in 2021, and revised in 2023.





PROTECTING OUR WORKFORCE

- > Commitment to Diversity, and Maintaining a Fair and Inclusive Workplace
- > Ensuring Health and Safety



**PRINCIPLE:**

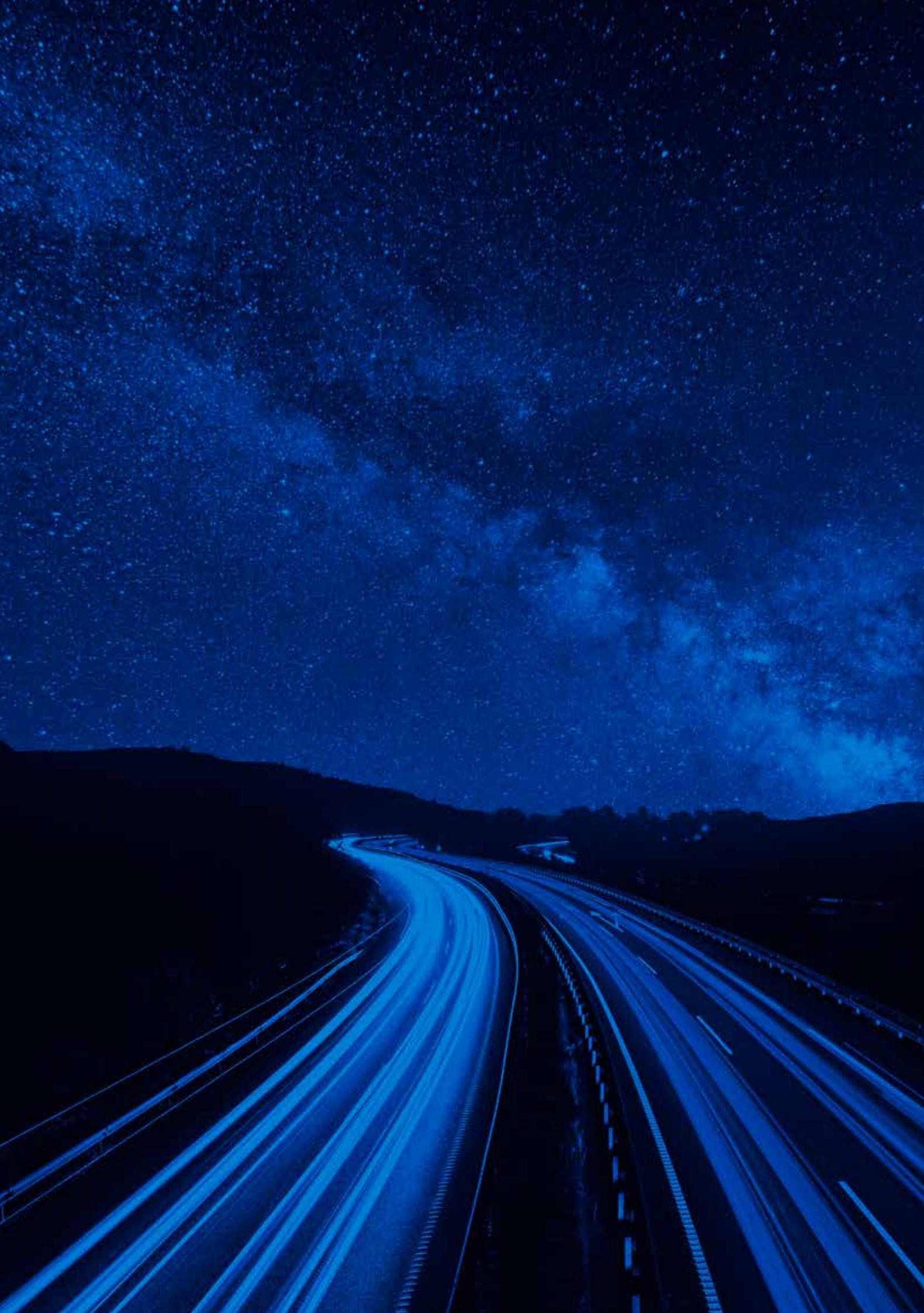
Commitment to Diversity, and Maintaining a Fair and Inclusive Workplace

Stellantis is committed to diversity, a fundamental strength. We are also committed to maintaining a fair, and inclusive workplace, free from favoritism, violence, harassment, or any kind of discrimination including based on age, race, gender, sexual orientation, or religion. Stellantis promotes equal employment opportunity and diversity, where everyone is valued for their contributions to the Company. 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 and the UN Women’s Empowerment Principles which outlines areas of commitment, measurement and transparency on gender gaps in the workforce. 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.

PRINCIPLE:

Ensuring Health and Safety

Stellantis promotes and encourages a culture of accident prevention, health protection and risk awareness at work. We require our workforce to strictly apply safety rules and remain vigilant at all times to identify potential risks and address them immediately. We also require our visiting business partners to follow the same rules while at our facilities. Stellantis strives to provide our workforce additional programs designed to promote and support individual safety, wellbeing and a healthy lifestyle.





CONDUCTING BUSINESS

- > Engaging In Sustainable Practices
- > Our Respect for the Law
- > Respecting Human Rights

PRINCIPLE:

Engaging In Sustainable Practices

Conducting our business with sustainable business practices is a core value at Stellantis. We seek to meet business demands while minimizing any adverse impact on current and future generations' communities and resources.

Stellantis is firmly committed to act in a socially responsible manner and in line with sustainable practices that include ensuring the health and safety of its workforce, prohibiting child labor and forced labor, and complying with conflict minerals and environmental protection regulations.

Environmental Protection

Environmental protection, and notably contributing to a decarbonized economy on our road to carbon neutrality, is one of our top priorities. Stellantis is committed to continuous improvement of the environmental performance of its operations, and to complying with all relevant legal and regulatory requirements. We strive to develop and implement innovative technical solutions that minimize environmental impacts and maximize safety in all our business activities.

To encourage the safe and eco-friendly use of our products, we provide customers and dealers with information regarding the use, maintenance and dismantling of our vehicles and other products.

Customers, Suppliers and Business Partners

Stellantis also encourages the adoption and sharing of sustainable practices among our business partners, suppliers and dealers. Stellantis is committed to sustainable practices in its procurement activity. The selection of suppliers is based not only on the quality and on competitiveness of their products and services, but also on their adherence to social, ethical and environmental principles, maintaining the highest standards of quality, and taking care of the communities in which we do business.

**PRINCIPLE:**

Our Respect for the Law

At Stellantis, it is our collective responsibility to do the right thing. We begin doing so by understanding and complying with the laws and regulations that apply to us.

Compliance with the Laws

Stellantis is committed to complying with all applicable laws and regulations. To further that objective, Stellantis has adopted a comprehensive compliance program, which includes guidelines, periodic training, awareness and advice. While it is impossible to mention all applicable laws and regulations in this Code, it is worth emphasizing our obligations to comply with the following laws:

Vehicle Safety and Emissions Laws and Regulations. Workforce members contribute, in the course of their duties, to achieve compliance with regulatory standards ensuring that the Group delivers quality products and services with a high level of safety, reliability and environmental performance. In particular, workforce members are expected to comply with the implemented safety and emissions standards, taking appropriate steps to prevent, identify and correct any non-compliance with such standards. Any vehicle safety and emissions issues encountered must be immediately reported to supervisors, the Compliance or Legal Departments, or through the [Integrity Helpline](#).

> EXAMPLE

The local vehicle environmental regulatory authority requires manufacturers to disclose software features that modulate the operation of the vehicle emission control system. An engineer chose not to disclose a relevant software feature because he was afraid the regulatory authority would not approve it. **This is a violation of the Code of Conduct and local law and could lead to fines and criminal penalties (depending on the jurisdiction). It could also jeopardize the Company's ability to operate the facility moving forward.**

Anti-Money Laundering. Stellantis prohibits money laundering and the funding or facilitation of any criminal activity. Stellantis has a process to investigate and detect suspicious transactions and business partners, and will take appropriate actions in the event that we detect any improper course of business.

Competition. Stellantis prohibits any anti-competitive business practices, recognizing the paramount importance of a competitive market and is committed to fully comply with any antitrust and other pro-competition legislation in force in the countries where it operates. The Stellantis workforce members will work vigilantly to avoid business practices that represent an antitrust violation.

> EXAMPLE

During a professional association meeting, it is proposed to share information including pricing. **The Stellantis employee should leave the meeting and request that their departure be reported in the meeting minutes.**

Export and Trade Regulations. Certain laws restrict the export of certain goods or technology to specific countries or individuals. Other laws prohibit doing business of any kind with certain individuals or legal entities. Stellantis requires the entire workforce to respect international and local requirements including customs and tax regulations, embargoes and export control measures.

Insider Trading. No Stellantis workforce who possesses material non-public information should trade securities of any legal entities of the Stellantis group of companies, or disclose this information to others. Material non-public information is information that a reasonable investor would consider important in a decision to buy, hold or sell a security. This includes, for example, non-public information about financial or operating results, possible mergers or acquisitions, marketing plans or new product launches.

Data Privacy and Protection. Local laws and regulations cover the protection of personal and private information. Stellantis is committed to respecting the privacy rights of our workforce members, customers, business partners and other persons or entities and to establish appropriate controls to safeguard personal data.



Private Corruption. Besides prohibiting bribery of government officials (see the anti-bribery provision below), Stellantis also prohibits private corruption, namely the receiving of gifts, invitations, advantages or payments between private parties according to the requirements specified in the related policy. All of the workforce must ensure that any gifts or invitations they give out are appropriate and reasonable, in a manner that would not influence improperly the judgement or the conduct of any external party. Transparency is the golden rule.

Please consult our detailed policies on these subjects and bring to the attention of the Compliance Department any doubts or concerns.

Working with Governments

Providing Information. All the information we provide to government agencies must be transparent, honest and responsive to any government requests. Our workforce members may be required to preserve information related to government inquiries, as well as litigation that is pending or that is reasonably anticipated.

Anti-bribery. Workforce members must refuse all forms of corruption. 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. To ensure your compliance with the law and the Code, please consult with the Compliance Department before giving anything of value to a government official.

Lobbying and Political Contribution. 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. Our workforce is free to participate in partisan political activities in a personal, private capacity, and outside of working hours, but may not represent the Company, nor give the impression that they are representing the Company, in such activities. Any efforts to interact with the government on other than routine matters, requires the approval of the department in charge of government affairs or the Compliance Department.

> EXAMPLE

A government approval for a facility expansion is needed and it does not look like you will be able to obtain it on time to meet the project deadline. **The right approach is to contact the department in charge of Government Affairs who can help you to obtain the approval legally. No other option is allowed.**



HUMAN
RIGHTS

**PRINCIPLE:**

Respecting Human Rights

Stellantis respects the Human Rights of all individuals and groups that may be affected by our operations. As a signatory of the UN Global Compact and supporter of the ILO Principles, Stellantis considers environmental and societal impacts in its decision-making processes in a 360-degree approach, sharing values and requirements with workforce members, suppliers, subcontractors, dealer networks and business partners.

We are committed to protecting Human Rights by aligning with internationally recognized Human Rights and labor standards, including the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the OECD Due Diligence Guidelines for Responsible Conduct.

We respect the Human Rights and dignity of people throughout our operations and global supply chain. We comply and expect our suppliers to comply with our Global Responsible Purchasing Guidelines as detailed in our Company disclosures.

Please consult our detailed [Human Rights Policy](#) on these subjects and report any concerns through the Company reporting channels.

> EXAMPLE

You are a Stellantis Purchaser conducting a Request for Proposals. You receive information that a business candidate may be using children in their production process. **If confirmed, this would violate our Code and our commitment to the respect of Human Rights. You must elevate the issue immediately and suspend consideration of the candidate's proposal until the matter is investigated and resolved.**





INTERACTING WITH EXTERNAL PARTIES

- Avoiding Conflicts of Interest
- Supporting our Communities

PRINCIPLE:

Avoiding Conflicts of Interest

Our workforce is expected to always maintain the highest degree of integrity when dealing with our business partners and to act solely in the best interest of the Company. A conflict of interest arises whenever employee's personal interests compromise that employee's ability to fully and objectively perform their responsibilities for the benefit of the Company. The situations that generate this type of conflict usually involve an effort to obtain some sort of personal or family benefit, or the pursuit of an outside business interest, in a way that conflicts with the economic or reputational interests of the Company. Our workforce is required to disclose actual or potential conflicts of interest to the Company thereby allowing the Company to evaluate the situation. The [Integrity Helpline](#) offers a dedicated channel for conflict of interest disclosure.

> EXAMPLE

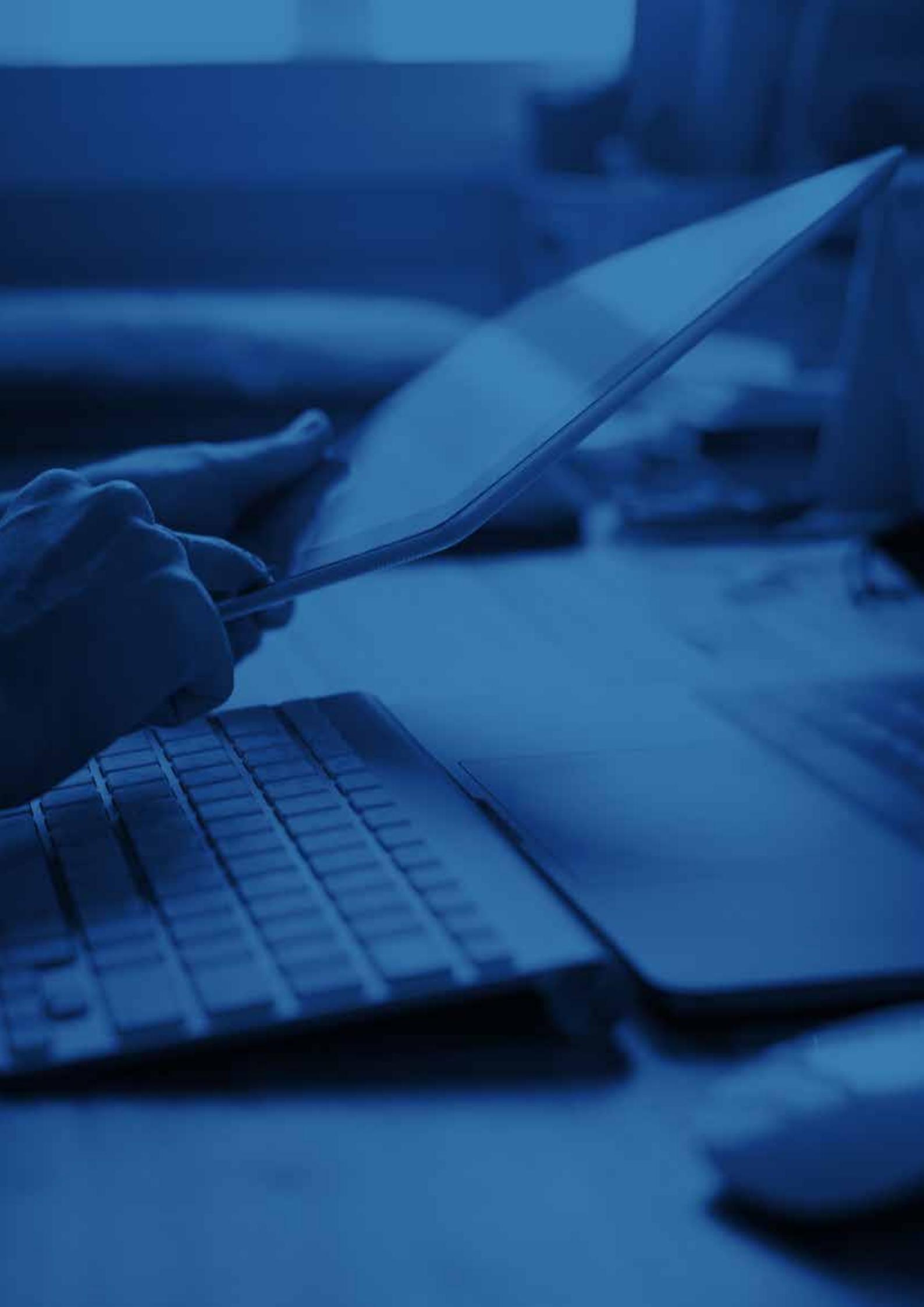
An employee is looking for an external provider for a project and one of his family members takes part in the tender. **The employee should disclose the potential conflict of interest to their manager and should not participate in the selection process.**

**PRINCIPLE:**

Supporting our Communities

Stellantis understands its key role in supporting the communities where we are present. Any organization within the Stellantis Group that wishes to make a donation for charity, educational or other purposes, or is engaged in voluntarism must ensure that such activities are in accordance with the Group's Code of Conduct, local regulations and prohibitions in this Code against contributions to political parties or candidates for public office.







MANAGING OUR ASSETS AND INFORMATION

- Communicating Effectively
- Protecting our Assets and Information
- Maintaining Appropriate Records

PRINCIPLE:

Communicating Effectively

Stellantis values honest and clear communication with our workforce, customers, stakeholders and the communities where we conduct business. We are committed to ensuring customers and consumers are provided with accurate and trustful information about our products and services. To ensure that information about the Company is accurate and effective, only Company spokespersons and members of senior management are entitled to speak on behalf of the Company. We expect our workforce to abide by the policies concerning confidential information and social media expressions.



**PRINCIPLE:**

Protecting our Assets and Information

Workforce members are responsible for the protection and proper usage of assets and should take steps to avoid their damage, theft or unauthorized use. This includes all types of assets, including physical, intangible and financial assets, as well as intellectual property such as patents, trademarks, copyrighted works and trade secrets.

Stellantis workforce must protect non-public confidential information that, if disclosed, would cause harm to the Company, as well as the confidential information of third parties in our possession.

It is imperative that we also protect personally identifiable information, and that we comply with all applicable data protection legislation.

> EXAMPLES

- An employee is asked to share on social media confidential information (photos or other details) regarding a Stellantis vehicle model with a very innovative design not yet launched.
- An employee steals confidential information and trade secrets related to autonomous-driving technology before leaving the Company for creating a startup that develops advanced automotive systems, in violation of the Stellantis Fraud Prevention Policy.
- During interactions with a generative Artificial Intelligence tool, an employee unintentionally shares proprietary software code, trade secrets, and other confidential information related to newly developed advanced technology.

The three above are examples of unauthorized disclosure of confidential information which is strictly prohibited as it may compromise Stellantis business information and intellectual property, as well as its competitive position. In case of any doubt, employees are encouraged to contact their supervisor for guidance.

PRINCIPLE:

Maintaining Appropriate Records

The orderly conduct of our business requires that each member of our workforce appropriately manages the business records that our customers, investors, business partners and governmental agencies rely on.

Stellantis maintains a Records Management process that meets legal and regulatory requirements, satisfies the information retention needs of our business, and ensures that outdated or unnecessary records and other documents are appropriately discarded.

A fundamental piece of our business is the proper maintenance of accounting records. Stellantis has internal controls to ensure that its records and financial statements provide a fair picture of the Company in compliance with applicable accounting and legal standards.

> **EXAMPLE**

An employee has stored on the laptop business records that should be retained for 10 years according to regulatory requirements, instead of moving them into Stellantis approved repositories.

Failing to adhere to our Records Management Policy and Procedures may result in Stellantis' inability to demonstrate compliance with regulations, and potentially lead to penalties or legal issues due to improper record-keeping practice.



