



# Group Public Affairs Charter Procedure

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## 1. Purpose

The purpose of this document is to set out the main principles of reference and roles and responsibilities of Public Affairs towards Public Institutions.

## 2. Scope

This is applicable to all Stellantis employees involved in Public Affairs Globally.

## 3. Definitions

Public institution means any entity established or controlled internationally or by government, state or regional government, or a local government or municipality.

## 4. Processes or Operating modes

STELLANTIS maintains relations with public institutions to support economic, social, environmental, scientific and cultural developments as a part of a transparent and democratic debate. We monitor relevant legislation and regulations, and we associate our expertise with the development of regulations and standards responsive to the needs of our customers, employees, and society.

To regulate its practices and make them clear to external contacts, STELLANTIS has adopted this charter for relations with public institutions, in addition to the existing code of conduct, to which all employees are subject. This charter applies to employees of STELLANTIS who interact with public authorities such as governments, parliaments, administrations, and local authorities. They are to carry out their activity with probity and integrity and to respect the following principles of transparency, confidentiality, and ethics.

### PRINCIPLES OF REFERENCE

#### 1. Transparency

STELLANTIS respects the institutional rules governing influential practices and business relationships. It applies the most demanding international standards (OECD, ILO, Global Compact). Listed on the New York Stock Exchange NYSE, the Italian Stock Exchange (MTA) and Euronext, Paris, it has signed the applicable registers of interest, which are made public on the Internet. A strict Delegation of

Authority process is applied to ensure that the positions taken by the Public Affairs department are aligned with the publicly available Company Strategy.

STELLANTIS reports as required by law the activities of, and interactions between, its employees and local, national, and international public bodies and institutions. A list of professional associations and other trade bodies to which the Group participates is maintained. Those employees or third-party representatives carrying out relations with public institutions must indicate that they are speaking on behalf of STELLANTIS when meeting institutional contacts.

The main positions promoted or defended by the Group are consistent with the Group's sustainable development commitments and are published each year in the Corporate Social Responsibility (CSR) report. Records of hearings with parliamentary committees and bodies are kept.

## **2. Control of practices**

The General Counsel of STELLANTIS, who is a member of the Top Executive Team and reports directly to the Chief Executive Officer, supervises the activities of the Public Affairs Department. The positions taken on the most significant topics are approved by the Chief Executive Officer and debated in the Strategy Council. The Delegation of Authority document sets out the levels of authority for the taking of important decisions for the Company. Positions taken on topics by STELLANTIS are recorded in electronic files.

Coordination meetings take place between the public affairs department and the departments in charge of Communication, CSR, Planning, Engineering and Manufacturing and other applicable departments.

## **3. Confidentiality**

Without prejudice to the transparency of the activities performed and the disclosure obligations established by applicable legislation, including those regarding the keeping and updating of the register of persons with access to inside information, those involved in the institutional relations process shall ensure the required levels of confidentiality for the protection of the business interests of STELLANTIS. Any former employee of another entity is expected to respect their legal and ethical obligations, including confidentiality, to their previous employer.

## **4. Political neutrality**

STELLANTIS works transparently with public authorities in the countries where it operates, following the code of conduct. It does not make financial contributions to political parties and prohibits any financial relationship with an elected official or a public service representative within the framework of their employment.

STELLANTIS does not take positions for any political party in election campaigns and does not allow visits of any of its sites for the purpose of campaign activities. Employees engaged in public affairs activities are expected to refrain from holding any national or supra-national political office.

## 5. Dialogue

STELLANTIS maintains relations with public institutions, as well as non-governmental stakeholders (trade unions, NGOs, citizens' associations, etc.) by responding to their requests for information and advocating, both as a company and as a member of various trade associations worldwide, for the position of STELLANTIS on issues of importance. This dialogue is open based on expertise and is not the subject of any financial or in-kind contribution. Stellantis employees are expected to act with integrity providing complete and accurate information as well as avoiding obtaining information or any decision through dishonest actions.

STELLANTIS employees who are not part of the Public Affairs Department must report to the Department the need to interface with institutions upon the receipt of a request for information and/or dialogue from institutions on matters with a potential strategic, financial, legislative, or reputational impact on the activities and markets of interest. Employees acting as representatives towards the public authorities must adhere to the principles of this charter.

## 6. Traceability

Those involved in the institutional relations process shall guarantee within their scope of responsibility the traceability of activities and documents related to their role. In addition, they shall ensure that the related documentation is retained in accordance with company policy and any legal requirements, using the dedicated information systems, where available. All donations to charitable organisations are recorded by the philanthropy department and are subject to annual review and approval.

### SCOPE

The Group General Counsel is responsible for the oversight of the Public Affairs departments' strategy and activities. The public affairs strategy aligns with the Company's public positions. The regional heads of the Public Affairs department, who report to the General Counsel, supervise the work of their team members.

### ROLES AND RESPONSIBILITIES

The Public Affairs Function shall operate in all major markets where STELLANTIS is present with the following responsibilities, which it may delegate where appropriate:

- formulate guidelines regarding local, national and international institutional relations
- support the development of business opportunities and preparation of instruments to drive performance in the countries in which it is present, including;
- large publicly funded strategic projects intended to develop the industrial sector;
- negotiations with public officials for incentives for industrialisation projects;
- support the creation, maintenance, development and coordination of relations and interaction with international, national and local public bodies and institutions representing STELLANTIS' interests where appropriate;

- conduct legislative analysis and sharing within the various company areas of critical risks and opportunities with respect to company strategy;
- update the business on the state of progress of legislative, regulatory, governmental activities and/or relations where appropriate and relevant; and
- ensure timely and accurate reporting, as required by law, of interactions between STELLANTIS employees and local, national, and international public bodies and institutions.

Subject to internal approvals, the Public Affairs Function may provide support to other group companies and Joint Ventures with their institutional relations activity.

## 5. Request for advice

Contact details of the Public Affairs team are available via the group intranet.

## 6. Reference documents

N/A

## 7. Version history

Version	Publication	Description
V1	December 13, 2022	Initial version