

Company Name Stellantis
Industry Automotive (Own Operations and Supply Chain)
Overall Score 17.9 out of 100

Theme Score	Out of	For Theme
1.7	10	A. Governance and Policies
7.7	25	B. Embedding Respect and Human Rights Due Diligence
3.5	20	C. Remedies and Grievance Mechanisms
2.5	25	D. Performance: Company Human Rights Practices
2.5	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: General HRs commitment: The Company states in its Code of Conduct: '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'. [Code of Conduct, 03/2021: stellantis.com] • Not Met: Universal Declaration of Human rights (UDHR) • Not Met: International Bill of Human Rights <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to the UNGPs: The Company highlights the FCA Human Rights Guidelines, that reads: 'These Guidelines are consistent with the spirit and intent of the United Nations Universal Declaration of Human Rights, [...] the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Companies, [...], the United Nations Guiding Principles on Business and Human Rights [...]'. However, this document does not cover the whole Stellantis Group, it is not a policy document and the expression "to be consistent" is not considered a formal statement of commitment according to CHRB wording criteria. No evidence of statement committing to respect UNGP or OECD Guidelines was found in a policy document from Stellantis (or Group companies covering all operations). [FCA Human Rights Guidelines, 2018: stellantis.com]

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			<ul style="list-style-type: none"> • Not Met: Commitment to the OECD Guidelines for Multinational Enterprises: The Company states in its Global Responsible Purchasing Guidelines: '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.' However, no formal statement of commitment to the OECD Guidelines according to CHRB wording criteria was found in a suitable source for policy statements, including commitment for own operations. On the other hand, the Company indicates in its CSR Report 2021: 'The Guidelines for Suppliers and Stellantis Human Rights Policy are consistent with the spirit and intent of the United Nations Universal Declaration of Human Rights, the 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 Labor Organization (ILO), the United Nations Guiding Principles on Business and Human Rights and the Modern Slavery Act 2015.' However, the CSR Report is no longer considered a suitable source for policy statements under CHRB's revised approach, and the Human Rights Policy has not been found in publicly available sources. Evidence needs to refer to commitments regarding owned operations. [Global Responsible Purchasing Guidelines, 12/2021: stellantis.com] & [CSR Report 2021, 02/2022: stellantis.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company has a commitment to the ILO Core: The Company states in its Code of Conduct: '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'. [Code of Conduct, 03/2021: stellantis.com] • Not Met: Company has an explicit commitment to All four ILO Core: The Company highlights the FCA Human Rights Guidelines, that includes provisions with respect ILO Core. Including: 'FCA respects workforce members' freedom of association. Workforce members are free to choose to join a trade union in accordance with local law and the rules of the various trade union organizations. FCA recognizes and respects the right of employees to be represented by trade unions or other representatives established in accordance with the locally applicable legislation and practice. When engaging in negotiations with such representatives, FCA's actions and behavior seek a constructive approach and relationship'. However, this document does not seem to cover the whole Stellantis Group, it is not seem to be a policy document and it is not clear whether it is committed to respect these rights in all contexts and locations (i.e alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'in accordance with the locally applicable legislation and practice'. No evidence of statement committing to respect each one of the ILO core areas was found in a policy document from Stellantis (or Group companies policies covering all its operations). [FCA Human Rights Guidelines, 2018: stellantis.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company expect suppliers to commit to ILO Core: The Company indicates in its Global Responsible Purchasing Guidelines: 'Stellantis regards the principles of the Global Compact and International Labor Organization conventions as key elements in the development of its purchasing policy'. However, no formal requirement of commitment to the ILO Declaration for suppliers, according to CHRB wording criteria, was found. [Global Responsible Purchasing Guidelines, 12/2021: stellantis.com] • Not Met: Company explicitly list All four ILO for suppliers: The Company's Global Responsible Purchasing Guidelines outline all Core ILO that suppliers are bound to in making business with the Company. With respect the rights to freedom of association and collective bargaining, the Company states: '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).' However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'in accordance with applicable local legislation'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require

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			alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Global Responsible Purchasing Guidelines, 12/2021: stellantis.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to respect H&S of workers: The Company states in its Code of Conduct: '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'. [Code of Conduct, 03/2021: stellantis.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The Company highlights the FCA Human Rights Guidelines, that reads: 'FCA is committed, among others, to: observing all applicable employment, wage, and working hours laws; [...]'. However, this document does not seem to cover the whole Stellantis Group, does not seem to be a policy document and no evidence found in it of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. [FCA Human Rights Guidelines, 2018: stellantis.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: The Company's Global Responsible Purchasing Guidelines reads: '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)'. [Global Responsible Purchasing Guidelines, 12/2021: stellantis.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: With respect working hours the Global Responsible Purchasing Guidelines indicates: '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'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Global Responsible Purchasing Guidelines, 12/2021: stellantis.com]
A.1.3.a.MO	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (MO)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Responsible mineral sourcing: The Company states in its CSR Report 2021: 'We acknowledge the necessity to comply with rules for the responsible sourcing of materials, such as in the global battery value chain'. However, 'to acknowledge the necessity to comply' is not considered a formal statement of commitment according to CHRB wording criteria, and, in addition, this document is no longer considered a suitable source for policy statements. On the other hand, its Global Responsible Purchasing Guidelines reads: '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").' However, 'to intend to exercise' is not considered a formal statement of commitment according to CHRB wording criteria. [CSR Report 2021, 02/2022: stellantis.com] & [Global Responsible Purchasing Guidelines, 12/2021: stellantis.com] • Not Met: Based on OECD Guidance: Its CSR Report 2021 reads: 'We follow the OECD Due Diligence Guidance for our supply chain which comprises reasonable due diligence measures to identify risks and prevent serious infringements of human rights and fundamental freedoms, and personal and environmental health and safety, arising from the activities of subcontractors or suppliers with whom there is an established business relationship'. However, no evidence found of the Company explicitly committing to follow OECD Due Diligence for at least 3TG in a formal policy document. CSR reports are not considered a suitable source for policy statements under CHRB revised approach. [CSR Report 2021, 02/2022: stellantis.com] • Not Met: Requires suppliers to commit to responsible mineral sourcing: The Global Responsible Purchasing Guidelines indicate: 'The Supplier undertakes to

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			<p>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.' However, no requirement to formally commit to responsible mineral sourcing was found. [Global Responsible Purchasing Guidelines, 12/2021: stellantis.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commits to follow OECD Guidance for all minerals • Not Met: Suppliers expected to make similar requirements of their suppliers
A.1.3.b.MO	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (MO)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Women's rights: The Company states in its CSR Report 2021: 'Committed to strengthening diversity and inclusion, Stellantis became a signatory to the UN Women's Empowerment Principles (UN Women)' [CSR Report 2021, 02/2022: stellantis.com] • Not Met: Expects suppliers to respect these rights: As stated in the Responsible Purchasing Guidelines: '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).[...] The Supplier acknowledges the principle of equal pay for equally valued and productive work, in particular between men and women'. However, no requirement found of a formal statement of commitment to respect women's rights. [Global Responsible Purchasing Guidelines, 12/2021: stellantis.com] & [Responsible Purchasing Policy, 05/2017: groupe-psa.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: CEDAW/Women's Empowerment Principles: See above. The Company became a signatory to the Women's Empowerment Principles. [CSR Report 2021, 02/2022: stellantis.com] • Not Met: Expecting suppliers to respect these rights
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: The Company commits to remedy: No evidence was found of a statement committing to provide remedy to victims (individuals, workers and communities) of adverse impacts that it has caused or contributed to cause in a policy document. Remedial actions focused on causes (such as corrective measures in suppliers responding to non-compliances found in audits) is not sufficient. • Not Met: Company expect suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact
A.1.5	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Zero tolerance attacks on HRs Defenders (HRDs): The Company has provided an additional source to this indicator but no material evidence was found. No evidence of statement committing to neither tolerate nor contribute to threats, intimidation and attacks (both physical and legal) against human rights defenders was found in a policy document. • Not Met: Company expect suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Board level responsibility for HRs: The CSR Report 2021 states that 'CSR IN THE BOARD OF DIRECTORS. [...] the Board of Directors is responsible for the management and strategic direction of the Company and has control and oversight responsibilities on the topics which impact the Company's sustainability and long term performance. Board structure, composition and related committees, are aligned with shareholders' long-term interests, which include CSR related matters. The function of the ESG Committee is to assist and advise the Board of Directors and act under authority delegated by the Board of Directors with respect to monitoring, evaluation and reporting on the sustainable policies and practices, management standards, strategy, performance and governance globally of the Company and its subsidiaries'. CSR matters include human rights. [CSR Report 2021, 02/2022: stellantis.com] • Met: Describe HR expertise of Board member: The Company discloses information about the skills of its Board members in its CSR Report 2021, according the matrix presented, several Board members have experience in: Diversity and Human Rights and Corporate Social Responsibility. [CSR Report 2021, 02/2022: stellantis.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Speeches/letters by Board members or CEO: The Company has provided an additional source to this indicator but no material evidence was found. No evidence of speech or communication letter from a Board Member discussing why human rights matter to the business or any challenges to respecting human rights encountered by the business was found.
A.2.2	Board responsibility	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board/Committee review HRs strategy: The Company indicates that: 'For human resources and labor relations at Stellantis, the Chief Human Resources and Transformation Officer sets and enforces a global strategy. The Stellantis Social Relation strategy is approved by the Top Executive team. [...] The Chief Human Resources and Transformation Officer is involved in strategic decisions in order to take the human factor into account. This is a necessary condition to establish a quality and proactive social dialogue [...] The Global Diversity Council is chaired by the Chief Executive Officer (CEO) and composed of the Stellantis Top Executive Team, some of whom also have the responsibility of Chairs of the Regional Diversity Councils for their region. The Council has the responsibility for setting the Company's Diversity and Inclusion strategy in alignment with the overall business strategy and objectives. It provides governance and oversight on the delivery of the key Diversity and Inclusion actions and the effectiveness of the Diversity and Inclusion function. [...] The governance process is overseen by the Strategy Council. In monthly Business Reviews the results related to Health and Safety are presented and discussed with the analysis of the impact on operations.' However, no information describing the processes it has in place to discuss and regularly review its human rights strategy or policy or management processes at board level or a board committee was found. The information presented in the CSR Report focused on the Executive team and no direct mention to human rights is made. [CSR Report 2021, 02/2022: stellantis.com] • Not Met: Examples/trends re HR discussion in the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Incentives for at least one board member: The Company indicates in its Annual Report 2021: 'The Remuneration Policy and a new LTI plan design was approved by shareholders at the April 15, 2021 Annual General Meeting. [...] The LTI plan covers approximately 1,600 employees, including our Executive Directors [CEO]. [...] The actual payout of performance share units depends on meeting strategic, long term Company performance goals: • Relative Total Shareholder Return (TSR) - weighted 40% • Merger synergies less implementation costs – weighted 40%, and • CO2 emissions reduction – weighted 20%'. No evidence of a human rights related incentive was found. [Annual Report 2021, 2022: fcagroup-preview.gcs-web.com] • Not Met: At least one key HR risk, beyond employee H&S: The Company has provided additional comment/source to CHRB regarding this indicator. However,

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			evidence was not material. No evidence of a human rights related factor considered one of the key sector risks the company considered salient taken into account in the incentive mechanism for at least one Board Members. Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Board process to review business model and strategy: The Company has provided additional comment/source to CHRB regarding this indicator. However, evidence was not material. No information describing the process(es) it has in place to discuss and review its business model and strategy for inherent risks to human rights at board level or a board committee was found. • Not Met: Describe frequency and triggers for reviewing Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Senior responsibility for HR implementation and decision making: The Company indicates in its CSR Report 2021: 'Stellantis CSR Global Office reports directly to the Executive Vice President (EVP) – Chief Communications and CSR Officer, who is a member of the top executive team and reports to the Chief Executive Officer'. [CSR Report 2021, 02/2022: stellantis.com] Score 2 <ul style="list-style-type: none"> • Met: How it assigns Day-to-day responsibility: In addition, the Company reports: 'The role of the CSR Global Office is to: ensure that Stellantis N.V. makes necessary corporate CSR public disclosures; support dialogue with stakeholders (including investors) on ESG matters; engage in assessment processes with CSR rating agencies; watch CSR disclosure related legal requirements and stakeholders expectations, applicable to Stellantis N.V. Stellantis CSR Global Office oversees a CSR network composed of subject matter experts: the CSR Champions and CSR Correspondents, who represent the global functions of the Company. The CSR Champions work to ensure that the CSR issues under their responsibility are considered appropriately in the decisions of their Division. [...] The CSR Correspondents focus on proper and reliable disclosure of qualitative and quantitative information for the CSR issues under their responsibility'. [CSR Report 2021, 02/2022: stellantis.com] • Not Met: Day-to-day resources and expertise allocation in own ops • Not Met: Resources and expertise allocation in the supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Senior manager incentives for human rights: The Company indicates in its CSR Report 2021: 'Top Management incentives are set to align as much as possible with the diverse stakeholders' interests'. However, no further evidence found describing the human rights factors considered in the incentive mechanism for senior managers. • Not Met: At least one key HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: HR risks is integrated as part of enterprise risk system: The Company indicates in its CSR Report 2021: 'The Chief Audit and Compliance Officer periodically conducts a Compliance Assessment to ensure that the Ethics and Compliance Program identifies compliance risks, takes proper steps to mitigate such risks, and does so in an efficient manner. The identification of compliance risks includes communication and collaboration with the ERM and Audit functions, as well as the integration of information from various relevant sources, including the Integrity Helpline channel'. However, no further information describing how human

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			<p>rights risks are integrated in the ERM system was found. [CSR Report 2021, 02/2022: stellantis.com]</p> <ul style="list-style-type: none"> • Not Met: Provides an example: The Company includes a human related risk in its Risk Factors listed in its Annual Report 2021: 'We are subject to laws and regulations relating to corruption and bribery, as well as stakeholder expectations relating to human rights in the supply chain and a failure to meet these legislative and stakeholder standards could lead to enforcement actions, penalties or damage awards and may also adversely affect our reputation with consumers.' No further details found of how this is integrated in the risk management system. [Annual Report 2021, 2022: fcagroup-preview.gcs-web.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a: See A.1.2.a • Not Met: Communicates its policy to all workers in own operations: The Company indicates in its CSR Report 2021: 'In 2021, the Company produced and released an online training on the Code of Conduct. The training is designed to be user-friendly and viewable on mobile devices. Close to the end of 2021, 77,285 people had individually completed the Code of Conduct online training and confirmed their acknowledgment of the Code of Conduct, comprising 88% of targeted employees.' The Code of Conduct includes human rights commitments. However, it is not clear if policy commitments have been communicated to all workers, including in appropriate languages. [CSR Report 2021, 02/2022: stellantis.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder • Not Met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a • Met: Requires suppliers to communicate policy requirements: The Responsible Purchasing Guidelines state that 'The Supplier pledges its commitment to fulfil its responsibility toward respecting human rights and promotes their respect throughout its entire supply chain'. In addition, the Company indicates in its CSR Report 2021: 'Stellantis pays particular attention to supplier training and provides them with tools that enable them to rapidly identify and react to risk situations. Suppliers have access to e-learning on CSR principles to evaluate and improve their CSR performance and how to build robust internal processes supporting CSR . [...]' The supplier training curriculum covers subjects related to purchasing, quality, supply chain management, manufacturing, finance and engineering. There are dedicated classes on sustainability-related topics such as responsible working conditions, environmental impacts, ethics and conflict minerals. The Company's ambition is to train 90% of the suppliers in CSR risks and the Stellantis requirements by 2025'. The purchasing guidelines state that 'Stellantis asks its Suppliers to accompany the deployment of the above principles throughout their supply chain. The supplier therefore undertakes to: (i) raise its own supplier's awareness on CSR issues; (ii) establish a responsible procurement policy respecting these principles; and (iii) implement all due diligence measures with respect to its own subcontracting'. [CSR Report 2021, 02/2022: stellantis.com] & [Global Responsible Purchasing Guidelines, 12/2021: stellantis.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: The Company indicates in its CSR Report 2021: 'The Responsible Purchasing Guidelines addresses topics focused on; compliance with laws, regulations, social and ethical principles, environmental protection and sustainable procurement including training and support for small and local suppliers. Stellantis requests supplier signatures and ensure that they are aware of the expectations necessary to maintain the status of a Stellantis supplier'. [CSR Report 2021, 02/2022: stellantis.com] • Not Met: Company requires suppliers to cascade down to their suppliers
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Met: How workers are trained on HR policy commitments: The Company indicates in its CSR Report 2021: 'In 2021, the Company produced and released an online training on the Code of Conduct. The training is designed to be user-friendly and viewable on mobile devices. Close to the end of 2021, 77,285 people had individually completed the Code of Conduct online training and confirmed their acknowledgment of the Code of Conduct, comprising 88% of targeted employees'.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>The Code of Conduct includes human rights commitments. [CSR Report 2021, 02/2022: stellantis.com]</p> <ul style="list-style-type: none"> • Not Met: Trains relevant managers including procurement: In addition, it indicates: 'In 2021, buyer training included two training events covering human rights topics.' However, no further details found on whether procurement teams, including managers receive specific human rights training relevant to their role. [CSR Report 2021, 02/2022: stellantis.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Not Met: Meets both requirements under score 1 • Met: Trains suppliers to meet company's HR commitment: The Company indicates in its CSR Report 2021: 'Stellantis pays particular attention to supplier training and provides them with tools that enable them to rapidly identify and react to risk situations. Suppliers have access to e-learning on CSR principles to evaluate and improve their CSR performance and how to build robust internal processes supporting CSR . [...] The supplier training curriculum covers subjects related to purchasing, quality, supply chain management, manufacturing, finance and engineering. There are dedicated classes on sustainability-related topics such as responsible working conditions, environmental impacts, ethics and conflict minerals. The Company's ambition is to train 90% of the suppliers in CSR risks and the Stellantis requirements by 2025'. [CSR Report 2021, 02/2022: stellantis.com] • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: With respect supply chain monitoring process, the Company indicates that 'To support the supplier assessment process on CSR criteria and make it more robust, Stellantis has embarked on an assessment of its Tier 1 supply base using criteria related to the environment, workforce, ethics and subcontracting chain. It has outsourced this assessment to an independent external company, EcoVadis. The first step was to identify supplier risks more precisely. Stellantis informed its suppliers that this evaluation was a prerequisite for the placement of future business, and to remain on the supplier panel. Stellantis requires its existing suppliers to be reassessed each year to continuously improve their CSR performance [...] In addition to the CSR assessment, on-site audits are performed. These audits are conducted for suppliers identified as risky according to three CSR criteria: [...] ' However, no similar information with respect own operations monitoring process was found. [CSR Report 2021, 02/2022: stellantis.com] • Met: Proportion of supply chain monitored: The Company indicates: '93% of suppliers approved during sourcing for CSR compliance. More than 2,561 supplier groups were assessed by EcoVadis and NQC, which accounts for more than 83% of the value of direct purchases'. [CSR Report 2021, 02/2022: stellantis.com] • Not Met: Describe how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Met: Describes corrective action process: The Company reports: 'A corrective action plan is automatically required for suppliers that do not receive a score that meets the standards set by Stellantis. [...] The external auditor creates an audit report for each audit. The report describes noncompliance and grades them according to four classifications; critical, core, minor and observations only, each requiring corrective action plans. If no satisfactory solution can be found to a critical or core noncompliance, a disengagement plan may be put in place after consultation with internal individuals affected by the decision. If necessary, an audit may be conducted to verify that action plans were implemented.' [CSR Report 2021, 02/2022: stellantis.com] • Met: Disclose findings and number of corrective action: In addition, the Company discloses information about the percentage of suppliers with Core non compliance, and Minor Non-Compliance in Labor and Human Rights (1% and 24% respectively) and also it presents a Summary of 2021 Critical Supplier Audits, specifying the number of non compliance in 5 CSR Categories, including: Human Rights (Uphold freedom of association and the effective recognition of the right to collective bargaining; Elimination of any forms of forced or compulsory labor; Zero-tolerance of child labor; Elimination of discrimination in terms of employment and occupation; Anti-corruption measures and the prevention of conflicts of interest; Labor organization and disciplinary practice), Working conditions (Remuneration; Working hours), Workplace health and safety (Organization; Buildings; Fire

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Prevention; Machines/electrics; Hazardous substances; Canteen; Dormitories). Finally it reports: '464 suppliers with corrective action plans which is 18% of the total assessed suppliers'. [CSR Report 2021, 02/2022: stellantis.com]
B.1.7	Engaging and terminating business relationships	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: HR affects selection of suppliers: According to its CSR Report 2021: 'The selection of suppliers is based on their adherence to social, ethical and environmental principles while maintaining high standards of quality and taking care of the communities where we do business.[...] The Stellantis sourcing process includes supplier CSR performance as a critical evaluation factor. If the supplier performance is below the acceptable level a deviation with an action plan to correct issues is required'. The Global Purchasing Guidelines indicates that '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 pre-requisite to becoming a supplier'. [CSR Report 2021, 02/2022: stellantis.com] & [Responsible Purchasing Policy, 05/2017: groupe-psa.com] • Met: HR affects on-going supplier relationships: The Company states in its CSR Report 2021: 'The suppliers questioned or audited systematically receive an analysis of their performance. For suppliers who do not achieve the required standard, a corrective action plan is put in place. Suppliers that do not improve or collaborate with Stellantis might ultimately be excluded from the Stellantis's supplier panel.' [CSR Report 2021, 02/2022: stellantis.com] Score 2 <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights • Met: Working with suppliers to meet HR requirements: In addition, it indicates: 'Supplier briefings are held each month to provide suppliers with CSR updates, communicate the Company's CSR expectations and inform them of legal and regulatory developments in CSR matters. Risk prevention takes place in the day-to-day relationship between buyers and suppliers. Stellantis pays particular attention to supplier training and provides them with tools that enable them to rapidly identify and react to risk situations. Suppliers have access to e-learning on CSR principles to evaluate and improve their CSR performance and how to build robust internal processes supporting CSR. Training for buyers and suppliers. The supplier training curriculum covers subjects related to purchasing, quality, supply chain management, manufacturing, finance and engineering. There are dedicated classes on sustainability-related topics such as responsible working conditions, environmental impacts, ethics and conflict minerals.' [CSR Report 2021, 02/2022: stellantis.com]
B.1.8	Approach to engagement with affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company reports: 'The Company has identified its main stakeholder categories and has engaged with them in ongoing dialogue through dedicated channels[...] Through effective dialogue with its stakeholders at the local and global levels, Stellantis works to ensure that: there are opportunities to gain mutual understanding with the society and its constituents; the most material environmental, social or economic risks are identified and addressed and better prevention measures are taken; actions are taken to reduce the negative effects of the Company's operations and to develop opportunities for value-creation; the Company remains attentive to sociological and technological changes; the Company is able to adapt its business model and propose new efficient solutions that meet changing expectations and needs of the society'. Its stakeholder groups include: employees, civil society, partners (suppliers). However, no further information describing the process or system to identify and engage with affected or potentially affected stakeholder, including a human rights context was found. [CSR Report 2021, 02/2022: stellantis.com] • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders Score 2 <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company indicates in its CSR Report 2021: 'Pursuant to French Act No. 2017-399 of 27 March 2017 on the duty of vigilance, the vigilance plan set out in this section includes reasonable measures of vigilance designed to identify risks and prevent serious breaches of human rights and fundamental freedoms, and to ensure the health and safety of persons and of the environment, arising from: the activities of subcontractors or suppliers (supply chain), the operation of the Company and its subsidiaries, the use of products and services marketed by the Company. While building its materiality matrix, the Company identified 6 macro-risks, divided into 22 CSR issues. The Company relied on an external third party to ensure fair and rigorous rating of each of the 22 CSR issues according to a uniform methodology. Analysis of CSR risks were carried out with a double materiality approach: both potential impacts of the Company's activity on the stakeholders (including the environment) and impacts of external environmental and social factors on the Company's activity were considered and assessed. The findings were submitted to Company's stakeholders' appraisal through interviews of a representative sample of our customers, employees, investors, suppliers and communities, identified based on their credibility and relevance toward our activities'. [CSR Report 2021, 02/2022: stellantis.com] & [Universal Registration Document 2019 - Groupe PSA, 04/2020: groupe-psa.com] • Met: Identifying risks through relevant business relationships: See above [CSR Report 2021, 02/2022: stellantis.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: The Company's Vigilance Plan serves 'to identify risks and prevent serious breaches of human rights and fundamental freedoms, and to ensure the health and safety of persons and of the environment, arising from: the activities of subcontractors or suppliers (supply chain), the operation of the Company and its subsidiaries, the use of products and services marketed by the Company.' In addition, it indicates: 'The findings were submitted to Company's stakeholders' appraisal through interviews of a representative sample of our customers, employees, investors, suppliers and communities, identified based on their credibility and relevance toward our activities'. However, no evidence of consultation with human rights experts was found. [CSR Report 2021, 02/2022: stellantis.com] • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describe process for assessment of HR risks and discloses salient HR issues: The Company discloses the following information: 'Analysis of CSR risks were carried out with a double materiality approach: both potential impacts of the Company's activity on the stakeholders (including the environment) and impacts of external environmental and social factors on the Company's activity were considered and assessed. The findings were submitted to Company's stakeholders' appraisal through interviews of a representative sample of our customers, employees, investors, suppliers and communities, identified based on their credibility and relevance toward our activities. 12 out of the 22 CSR issues were selected to be included in the vigilance plan, according to the following rule. A CSR issue is included in the vigilance plan if: it has an impact on human rights and fundamental freedoms HR and/or on the health and safety of persons H&S and/or on the environment ENV, in compliance with the French law on the Duty of vigilance; and it is classified as "Strategic CSR issue" or "Significant CSR issue" in Stellantis' materiality matrix' [CSR Report 2021, 02/2022: stellantis.com] • Met: How process applies to supply chain: See above [CSR Report 2021, 02/2022: stellantis.com] • Not Met: Public disclosure of the results of HR assessment: Although the Company discloses a list of 12 CSR issues, including human rights topics, there is no details about specific human rights risks identified. For supply chain it summarizes the risks identified as: CSR Issue #20: Responsible purchasing practices to support the company's development in host territories, CSR issue #21: Human rights in the supply chain CSR; while for own operations it indicates: CSR Issue #4: Management of company transformation and social dialogue, CSR Issue #6: Diversity and equal opportunity' [CSR Report 2021, 02/2022: stellantis.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Action Plans to mitigate risks: Although the Company presents a list of measures put in place to face the CSR issues identified, no specific human rights risks is mentioned. For example, to face CSR ISSUE #21: Human rights in the supply chain, the Company presents 5 measures, including: Risk mapping designed to identify, analyse and classify risks, Procedures for regular assessment of the situation in connection with risk mapping, Appropriate actions to mitigate the risk of or to prevent serious breaches, A mechanism for alerting and for gathering reports on the existence or materialisation of risks and A system for monitoring measures implemented and for assessing their effectiveness'. This indicator looks for evidence of a system to take those appropriate actions to mitigate the risk or prevent it. [CSR Report 2021, 02/2022: stellantis.com] • Not Met: Description of how global system applies to supply chain: See above [CSR Report 2021, 02/2022: stellantis.com] & [Responsible Purchasing Policy, 05/2017: groupe-psa.com] • Met: Example of actions decided on at least 1 salient HR issues: The Company states: 'Groupe PSA policy on the fight against forced or compulsory labour practices and modern slavery is applied jointly by the Purchasing Division with regards to the supply chain and by the HR division to reinforce the effectiveness of Group requirements within its areas of responsibility. HR managers of all countries have been requested to check the practices under their control regarding the at-risk points related to temporary workers and recruitment consultancy, such as wages paid to temporary workers in accordance with the law and reference wages agreed, the invoicing for services provided in a suitable manner, and the absence of fees or financial burdens imposed on workers or applicants'. [CSR Report 2019 - Groupe PSA, 03/2020: cotecorp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: System for tracking or monitor if actions taken are effective • Not Met: Lessons learnt from checking system effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company states in its CSR Report 2021: 'The Whistleblowing system ensures that any violation of Stellantis compliance rules can be reported and received securely and confidentially and processed and managed properly. This system is open to employees, suppliers and other stakeholders'. [CSR Report 2021, 02/2022: stellantis.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Channel is available in all appropriate languages and workers aware: With respect awareness, the Company indicates in its CSR Report 2021: 'In 2021, the Company produced and released an online training on the Code of Conduct. The training is designed to be user-friendly and viewable on mobile devices. Close to the end of 2021, 77,285 people had individually completed the Code of Conduct online training and confirmed their acknowledgment of the Code of Conduct, comprising 88% of targeted employees.' The Whistleblowing Policy is available in 7 languages. However, the Company's Integrity Line website is available only in English, French and Italian. It is not clear whether grievance mechanism is available in all appropriate languages. [CSR Report 2021, 02/2022: stellantis.com] & [Ethics Point, N/A: secure.ethicspoint.eu] • Met: Describe how workers in the supply chain have access to grievance mechanism: The Company indicates in its Responsible Purchasing Guidelines: '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'. [Global Responsible Purchasing Guidelines, 12/2021: stellantis.com] • Met: Expect Suppliers to convey expectation to their own suppliers: In addition, it indicates: 'Stellantis asks its Suppliers to accompany the deployment of the above principles throughout their supply chain. The Supplier therefore undertakes to: (i) raise its own supplier's awareness on CSR issues; (ii) establish a responsible procurement policy respecting these principles; and (iii) implement all due diligence measures with respect to its own subcontracting chain'. [Global Responsible Purchasing Guidelines, 12/2021: stellantis.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company states in its CSR Report 2021: 'The Whistleblowing system ensures that any violation of Stellantis compliance rules can be reported and received securely and confidentially and processed and managed properly. This system is open to employees, suppliers and other stakeholders'. [CSR Report 2021, 02/2022: stellantis.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness • Not Met: Communities access mechanism direct or through suppliers: Although the mechanism is available to suppliers' employees, it is not clear if this availability is made extensive to suppliers' external stakeholders. [Responsible Purchasing Policy, 05/2017: groupe-psa.com] • Not Met: Expect supplier to convey expectation to their own suppliers
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engages users to create or assess system • Not Met: Examples (at least two) of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Response timescales and how complainants will be informed: The Company indicates in its Integrity Helpline FAQ document: 'Once you have finished reporting your concern, you will be provided with a report key and asked to create a password. With these two pieces of identification, you will be able to follow up on a report, either by visiting the "Integrity Helpline" portal or contacting the telephone helpline. You may need to wait a few days after your submission before you can monitor progress and check whether you are being asked for any additional information. To allow for protection of the matter and any parties involved, details of the case cannot be provided.' However, evidence with respect response timescales was found. [Code of Ethics, 11/2019: groupe-psa.com] • Not Met: Describe support (technical, financial,etc) available for equal access by complainants <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Escalation to senior/independent level

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.5	Prohibition of retaliation for raising complaints or concerns	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: The Company states in its Code of Conduct: '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.' A similar provision is included in the Whistleblowing Policy: 'Reporting is safe and Stellantis will always protect the reporting person from any kind of retaliation if reported in good faith. Anyone who retaliates against a person who reports a concern in good faith will be subject to disciplinary action.' [Code of Conduct, 03/2021: stellantis.com] & [Whistleblowing Policy, 12/2021: stellantis.com] • Met: Practical measures to prevent retaliation: Its Whistleblowing Policy reads: 'The policy permits anonymous reporting, unless local law provides otherwise; however, it is recommended for the reporter to identify themselves. All reports received will be treated confidentially. Reporting is safe and Stellantis will always protect the reporting person from any kind of retaliation if reported in good faith. Anyone who retaliates against a person who reports a concern in good faith will be subject to disciplinary action'. As indicated in previous indicators, training on the code is being conducted. [Whistleblowing Policy, 12/2021: stellantis.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes how remedy has been provided • Not Met: Says how it would provide remedy for victims if no adverse impact identified <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Number grievances filed, addressed or resolved and outcome achieved • Not Met: How lessons from mechanism improve management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

D.5 Automotive Manufacturing

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.1.a	Living wage (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Pays living wage or sets target date: The Company indicates in its CSR Report 2021: 'Stellantis has a strong commitment to fundamental human rights, based both on the principles formulated in the "PSA Global Framework Agreement on Social Responsibility" (GFA) and in the "FCA human rights guidelines". In 2021, the Company continued strongly to exercise vigilance in this area within its various activities and subsidiaries, by carrying out internal audits and monitoring the application of the GFA. In addition, we have begun working to define a merged framework of human rights principles and tools for their adoption and control.' In addition, the FCA Human Rights Guidelines, that reads: 'FCA is committed, among others, to: observing all applicable employment, wage, and working hours laws; honoring our collective labor agreements; offering compensation and benefits to all members of our workforce in a fair, objective, and equitable manner.' However, this document does not include the whole group, as it is focused on Fiat - Chrysler Automobiles only. In addition, no living wage reference was found. [FCA Human Rights Guidelines, 2018: stellantis.com] & [CSR Report 2021, 02/2022: stellantis.com] • Not Met: Describes how living wage determined <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Paying living wage • Not Met: Definition of living wage reviewed with unions
D.5.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Discloses living wage requirements in supplier code or contracts: The Company requires in its Responsible Purchasing Guidelines: '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.' However, no evidence was found on discretionary income for employees and their family/dependents [Responsible Purchasing Practices, N/A: stellantis.com] • Not Met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.5.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Avoids business model pressure on HRs (purchasing practices) • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices
D.5.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company indicates on its website that it has 'mapped and audited the refiners in the supply chain for our high-voltage battery suppliers.' However, no evidence was found on a information regarding the rest of direct suppliers and indirect suppliers. [Responsible Purchasing Practices, N/A: stellantis.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why: The Company discloses its List of Refiners, with the results of its refiners mapping process. However, no further information found, including names and locations of both direct and indirect suppliers for, at least, the most significant part of the supply chain (to be defined by the Company) [List of Refiners, 2021: stellantis.com] • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Does not use child labour: The Company states in its Code of Conduct: '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'. [Code of Conduct, 03/2021: stellantis.com] • Not Met: Age verification of workers recruited: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. No evidence indicating that it verifies the age of workers recruited in its own operations to ensure that they are not engaged in child labour was found <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remediation if children identified
D.5.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Child Labour rules in codes or contracts: The Company states in its Responsible Purchasing Guidelines: 'The Supplier is prohibited from employing children in violation of the stipulations of the International Labour Organization's conventions (ILO Convention 138 and 182).' However, no requirements found regarding age verification and remedial plans in case child labour was found. [Global Responsible Purchasing Guidelines, 12/2021: stellantis.com] • Not Met: How working with suppliers on child labour <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made: The Company discloses information on compliance audits in the CSR Report 2019 from Groupe PSA, with a section dedicated to Child Labour among other human rights violations. However, no specific number of 'child labour' non-compliances was found, and no year-on-year data found in the same report to allow comparison. [CSR Report 2019 - Groupe PSA, 03/2020: cotecorp.com]
D.5.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Job seekers and workers do not pay recruitment fee: The Company indicates in its CSR Report 2021: 'Stellantis has a strong commitment to fundamental human rights, based both on the principles formulated in the "PSA Global Framework Agreement on Social Responsibility" (GFA) and in the "FCA human rights guidelines". In 2021, the Company continued strongly to exercise vigilance in this area within its various activities and subsidiaries, by carrying out internal audits and monitoring the application of the GFA. In addition, we have begun working to define a merged framework of human rights principles and tools for their adoption and control.' However, no evidence indicating that job seekers and workers do not pay any recruitment fees or related costs to secure a job (Employer Pays Principle) was found. [CSR Report 2021, 02/2022: stellantis.com] • Not Met: Commits to fully reimbursing if they have paid <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters
D.5.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Debt and fees rules in codes or contracts: The Company requires in its Responsible Purchasing Guidelines: '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).' As indicated, non-payment of salary is included among considerations. However, no evidence found of requirement for the supplier to pay, as employees, all costs or charges involved in the recruitment process. [Global Responsible Purchasing Guidelines, 12/2021: stellantis.com] • Not Met: How working with suppliers on debt & fees <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Pays workers in full and on time: The Company indicates in its CSR Report 2021: 'Stellantis has a strong commitment to fundamental human rights, based both on the principles formulated in the "PSA Global Framework Agreement on Social Responsibility" (GFA) and in the "FCA human rights guidelines". In 2021, the Company continued strongly to exercise vigilance in this area within its various activities and subsidiaries, by carrying out internal audits and monitoring the application of the GFA. In addition, we have begun working to define a merged framework of human rights principles and tools for their adoption and control.' However, no evidence indicating that it pays workers in full and on time was found. <ul style="list-style-type: none"> Not Met: Payslips show any legitimate deductions Score 2 <ul style="list-style-type: none"> Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.5.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Requirement for suppliers to pay workers in full and on time in codes or contracts Not Met: How working with supply chain to pay workers regularly and on time Score 2 <ul style="list-style-type: none"> Not Met: Assessment of the number affected by failure to pay directly Not Met: Provides analysis of trends demonstrating progress
D.5.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Does not retain documents or restrict movement: Although the Company prohibits forced labor, no specific reference found to non-retaining workers' personal documents or restricting workers freedom of movement. [Code of Conduct, 03/2021: stellantis.com] & [Code of Ethics, 11/2019: groupe-psa.com] Score 2 <ul style="list-style-type: none"> Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.5.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Free movement rules in codes or contracts: The Company requires in its Responsible Purchasing Guidelines: '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).' However, no specific requirement found regarding freedom of movement, including withholding personal identifications, travel documents, or other measures that restrict movement. [Global Responsible Purchasing Guidelines, 12/2021: stellantis.com] <ul style="list-style-type: none"> Not Met: How working with suppliers on free movement Score 2 <ul style="list-style-type: none"> Not Met: Assessment of the number affected by retaining docs or restricting movement Not Met: Provides analysis of trends demonstrating progress
D.5.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The Company states in its CSR Report 2021: 'The company fully complies with both legislation and Collective Bargaining Agreements. Stellantis promotes and implements exchange with social partners regarding any significant operational changes to find the most appropriate way out in a responsible manner. As part of this policy the Freedom of Association is respected, protects and promotes the fundamental labor rights of their employees namely, and the right to collective bargaining. [...] free exercise of the right to organize the efficiency of this organization is represented by 91.5% of employees who are represented by trade unions or employee representatives - 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.' [CSR Report 2021, 02/2022: stellantis.com] <ul style="list-style-type: none"> Met: Discloses % total direct operations covered by collective CB agreements: The Company indicates that '87% of the workforce are covered by collective agreement'. [CSR Report 2021, 02/2022: stellantis.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Met: Meets both requirements under score 1
D.5.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: FoA & CB rules in codes or contracts: The Company requires in its Responsible Purchasing Guidelines: '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).' However, no evidence found in relation alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Global Responsible Purchasing Guidelines, 12/2021: stellantis.com] • Not Met: How working with suppliers on FoA and CB Score 2 • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.5.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Describes process to identify H&S risks and impacts: The Company indicates in its CSR Report 2021: 'Stellantis is committed to prevent health and safety risks at work of employees by preventing fatality, disability, injury and illness; by completing risk analysis to identify workplace hazards and potential exposures, implementing containment and countermeasures to permanently reduce the identified risks; by promoting health and safety to support and enhance a healthy and engaged workforce; by empowering everyone, so that each contributes to improving the workplace and by deploying an effective management system to provide strong standards, measure our results and impacts and support our continuous improvement. [...] The SPW Health and Safety applies risk identification and assessment, both on a routine and non-routine basis, with the purpose of singling out major risk areas and implementing preventive action plans. Risk areas include physical, ergonomic, chemical and psychosocial risks. The Hierarchy of Controls methodology is then used to determine the proper countermeasures'. [CSR Report 2021, 02/2022: stellantis.com] • Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: The Company reports its Lost Time Injury Rate for 2021: 1. [CSR Report 2021, 02/2022: stellantis.com] • Met: Discloses Fatalities for last reporting period: The Company reports 1 fatal accident during 2021. [CSR Report 2021, 02/2022: stellantis.com] • Not Met: Occupational disease rate for last reporting period Score 2 • Not Met: Set targets for H&S performance: The Company indicates that: 'We target to achieve every year a Lost-time injury frequency rate <1'. No further details found in relation to targets to fatalities and occupational disease rates for the last reporting period. [CSR Report 2021, 02/2022: stellantis.com] • Not Met: Met targets or explain why not or what is doing to improve management systems: The Company reports: 'We target to achieve every year a Lost-time injury frequency rate <1. In 2021, we reach 1.' However, no further analysis of its performance was found. [CSR Report 2021, 02/2022: stellantis.com]
D.5.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Sets out clear Health and Safety requirements: The Company requires in its Responsible Purchasing Guidelines: '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).' However, no specific health and safety requirements were found in its contractual arrangements with suppliers or supplier code of conduct. [Global Responsible Purchasing Guidelines, 12/2021: stellantis.com] • Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Fatalities disclosures for lasting reporting period • Not Met: Occupational disease rates for the last reporting period Score 2 <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provide analysis of trends in progress made [CSR Report 2019 - Groupe PSA, 03/2020: cotecorp.com]
D.5.8.a	Women's rights (in own production or manufacturing operations)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Process to stop harassment and violence against women: The Company reports in its CSR Report 2021: 'Within PSA organization, a new training program was deployed globally to address the issue of stereotypes and discriminatory behavior, which was a commitment of the "Motivation and Well-being at work" agreement with social partners. Using augmented reality technology, the key themes of sexism, working parents, age and invisible disabilities were addressed'. In addition, Groupe PSA CDR 2019 indicated: 'Groupe PSA has long been committed to fighting sexism and violence against women. As early as 2006, the Group's Global Framework Agreement on Social Responsibility has firmly demonstrated that the Group has a zero tolerance policy on sexism. Since 2006, measures have been taken to support employees who are victims of domestic violence. In Spain, a company agreement signed in 2006 strengthens victim rights and protection measures. In France, since 2007, a system for reporting cases of harassment in the workplace has been in place, which includes a special email address, harcelement@mpsa.com, and the appointment of equality and diversity advisers. This system has been supplemented in 2018 by the "Speak4Compliance" whistleblowing system (see 6.1.3.1). In March 2017, Groupe PSA kicked off a mobilisation campaign to instil a corporate culture that is free from sexism and that safeguards good working relationships between women and men, as well as improving well-being and collective performance. It is the outcome of a task force that includes members of the "Women Engaged for PSA" women's network that has collected testimonials of experiences. This led to the production and release of a film to raise awareness and change behaviours. This action plan also includes an action guide, "Groupe PSA Committed to Fighting Sexism", which provides key information on the realities of sexism, legislation and sanctions, information for victims of and witnesses to sexist behaviour, and encouragement to report any misconduct. [CSR Report 2019 - Groupe PSA, 03/2020: cotecorp.com] & [CSR Report 2021, 02/2022: stellantis.com] • Not Met: Working conditions take account of gender • Met: Measures and steps to address gender pay gap at all levels of employment: In addition, the Company indicates: 'Stellantis is aligned with the vision of the United Nations Sustainable Development Goal on Gender Equality, and committed to following the UN Women's Empowerment Principles, which encourages companies to promote gender equality and the empowerment of women in the workplace, industry, and community. With this commitment, the Company shares its intention to adopt business practices that support gender equality and empower women within the Stellantis organization, globally and across the automotive industry. These include, among others, processes to ensure equity and fairness in the determination of compensation levels (Blue Collars average wages for women is 94% of average wages for men and 91% for White Collars), annual salary reviews and promotions; provision of flexible working opportunities to support work-life balance arrangements; and events to foster interest in technical careers among women'. [CSR Report 2021, 02/2022: stellantis.com] Score 2 <ul style="list-style-type: none"> • Not Met: Meet all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap
D.5.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Women's rights in codes or contracts: The Company requires in its Responsible Purchasing Guidelines: 'The Supplier acknowledges the principle of equal pay for equally valued and productive work, in particular between men and women (ILO Convention 100).' However, 'to acknowledges' is not considered a commitment statement according to CHRB wording criteria. No further evidence related to women's rights was found in the Supplier Code. [Global Responsible Purchasing Guidelines, 12/2021: stellantis.com] • Not Met: How working with suppliers on women's rights Score 2 <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Provide analysis of trends in progress made
D.5.9.a	Working hours (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Respects max hours, min breaks and rest periods in its own operations: The Company indicates in its CSR Report 2021: 'Stellantis has a strong commitment to fundamental human rights, based both on the principles formulated in the "PSA Global Framework Agreement on Social Responsibility" (GFA) and in the "FCA human rights guidelines". In 2021, the Company continued strongly to exercise vigilance in this area within its various activities and subsidiaries, by carrying out internal audits and monitoring the application of the GFA. In addition, we have begun working to define a merged framework of human rights principles and tools for their adoption and control.' However, no evidence indicating that it respects applicable international standards concerning maximum hours and minimum breaks and rest periods in its own operations was found. [CSR Report 2021, 02/2022: stellantis.com] • Not Met: Assesses ability to comply with its commitments when allocating work/targets <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How it implements and checks this in its operations
D.5.9.b	Working hours (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Working hours in codes or contracts: The Company requires in its Responsible Purchasing Guidelines: '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.' No specific requirement found, however, in relation to maximum standard weekly hours. [Global Responsible Purchasing Guidelines, 12/2021: stellantis.com] • Not Met: How working with suppliers on working hours <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by excessive working hours • Not Met: Provide analysis of trends in progress made
D.5.10.a	Responsible Mineral Sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Due diligence in accordance with OECD Guidance in supplier contracts: The Company requires in its Responsible Purchasing Guidelines: '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 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.' However, no evidence found of contractual requirements to carry out due diligence in accordance with the OECD Guidance for at least 3TG. [Global Responsible Purchasing Guidelines, 12/2021: stellantis.com] • Not Met: Works with smelters/refiners and suppliers to build capacity <p>Score 2</p> <ul style="list-style-type: none"> • Met: Contractual requirement to disclosure smelter/refiner information: As indicated above, suppliers are required 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'. [Global Responsible Purchasing Guidelines, 12/2021: stellantis.com] • Not Met: Contractual requirement covers all minerals

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.10.b	Responsible Mineral Sourcing: Risk identification in mineral supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Risk identification and disclosure in line with OECD Guidance • Not Met: Identification of smelter/refiners and OECD Guidance Score 2 <ul style="list-style-type: none"> • Not Met: Discloses smelters/refiners judged in line with OECD Guidance: The Company discloses its Refiners List in its direct material supply chain for high voltage Batteries, indicating that 'Audits are conducted based on the OECD Due Diligence Guidance.' However, this list is focused only in direct material for high voltage batteries, no further information was found regarding the rest of its supply chain [List of Refiners, 2021: stellantis.com] • Not Met: Risk identification and disclosure covers all minerals
D.5.10.c	Responsible Mineral Sourcing: Risk management in the mineral supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes mineral risk management plan for supply chain • Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time • Not Met: Disclose better risk prevention/mitigation over time Score 2 <ul style="list-style-type: none"> • Not Met: Suppliers and stakeholders engaged in risk management strategy • Not Met: Risk management and response processes cover all minerals
D.5.11	Responsible Materials Sourcing	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Due diligence for raw materials in supplier code/contracts • Not Met: Works with suppliers to build capacity in risk assessment and due diligence Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Identify the sources of high-risk raw materials in its supply chain

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Child labour • Headline: Mica mineral suppliers of CRRC MA, Panasonic, and others accused of using child laborers in Madagascar • Story: On Monday, November 18, 2019, Dutch NGO Terre des Hommes released a report documenting the widespread use of child labor at mica mining sites in Madagascar. According to the human rights advocates at Terre des Hommes, at least 11,000 children between the ages of five and 17 are employed in quarrying and processing mica. Mining mica is dangerous work, with children complaining of aching muscles, headaches, dehydration, open sores, and respiratory problems, according to The Guardian. Mica is used in a range of common products, including cosmetics and paints, with 87 percent of the mineral mined in Madagascar shipped to China. NBC News points out that as Madagascar is one of the largest exporters of mica, then the material origin of mica used by companies that rely on the mineral, such as Fiat-Chrysler, is questionable. [NBC NEWS, 18/11/19, "‘Zone Rouge’: An army of children toils in African mines How mica mined by kids in Madagascar ends up in products used by millions of Americans.": nbcnews.com] [Terre des hommes, 14/11/19, "CHILD LABOUR IN MADAGASCAR’S MICA SECTOR": assets.documentcloud.org] [Africa Times, 20/11/19, "Report: Madagascar’s mica mines rely on child labor": africatimes.com] [The Guardian, 21/11/19, "Children as young as five make up most of Madagascar’s mica mining workforce": theguardian.com]
E(1).1	The company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public response: In response to the allegation, Fiat-Chrysler said it “engages in collaborative action with global stakeholders across industries and along the value chain to promote and develop our raw material supply chain.” [NBC NEWS, 18/11/19: nbcnews.com] Score 2 <ul style="list-style-type: none"> • Not Met: Detailed response: Although Fiat Chrysler provided a response outlining their actions taken to ensure standards are being met in mica mining, it did not respond directly to the child labour abuse occurring in Madagascar at mica mining sites. [NBC, N/A, "Company Responses": documentcloud.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).2	The company has investigated and taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders • Not Met: Identified cause Score 2 <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: The company stated it will continue to enhance its internal processes and evaluate additional alliances with existing consortiums to drive positive impact in the community, however, there is no evidence suggesting it did review its management systems. [NBC, N/A, "Company Responses": documentcloud.org] • Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provided remedy: Although Fiat Chrysler stated it will continue to enhance its internal processes and evaluate additional alliances with existing consortiums to drive positive impact in the community, it is not clear whether these efforts are enough to ensure that the company will no longer import minerals originating from sites where children are forced to work or reduce the likelihood of child labor occurring in the company's supply chain. • Not Met: Evidence for lack of Impact or link Score 2 <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and

governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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