

FAQ Ethical Channel

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ETHICAL CHANNEL

1.1. What is the Ethical Channel?

The Ethical Channel is the means that the entities included in this Internal Reporting System (the Entity hereinafter) have to report, confidentially and anonymously -if so wished-, any conduct in breach of legal or internal regulations provided that it takes place in the professional sphere, without the person who reports such breaches through Ethical Channel being subject to reprisals, among other guarantees and rights of the reporter that are included in the Policy that regulates the Channel.

1.2. What are its characteristics?

The Ethical Channel's key characteristics are as follows:

- Open door policy: This channel can be used by any active employees, suppliers, customers, shareholders, member of the Board of Directors, intern, or any third party related to the entity.
- The Ethical Channel's access platform will be managed by an external provider (NAVEX); any reported situations will be handled and investigated by the corresponding internal teams.

The strict prohibition of reprisals or any type of negative consequence for having reported a situation, except for any disciplinary measures which may have to be applied if the internal investigation determines that the situation was reported in bad faith.

1.3. Why is the Ethical Channel needed?

Stellantis Financial Services Europe (SFSE) and Santander Consumer Finance (SCF) Groups have agreed on a common Ethical Channel for the Joint Ventures they are managing jointly. The Ethical Channel aims for detecting and acting on conducts related to breaches of legal or internal regulations and/or breaches of the Code of Ethics, while fostering an atmosphere where you can speak up and be truly listened.

Additionally, the legal regulations which apply to each entity demand that they have specific reporting channels in place to notify misconduct in terms of serious or very serious administrative or criminal offences, breaches of European Union Law, accounting or auditing, internal control or inappropriate influence on external auditors, as well as any breaches of the regulations on anti- money laundering and the financing of terrorism.

Furthermore, an effective communication system such as the Ethical Channel reinforces our commitment to promoting an ethical and honest culture, to which SFSE and SCF Groups are strongly committed.

2 REPORTING – General

2.1. How can I access the channel?

The Ethical Channel allows for confidential or anonymous reporting via the online platform. Go to the web:

- https://stellantisfinancialserviceseurope.ethicspoint.com (PC)
- stellantisfinancialserviceseuropemobile.ethicspoint.com (Mobile).

You can also request a face-to-face meeting with the Compliance function.

2.2. What type of situations should I report?

Through the Ethical Channel you can report conduct which breaches the applicable legal regulations and/ or the Code of Ethics that take place in the professional sphere, in accordance with paragraph 1.1 of the Ethical Channel Policy.

No commercial complaints or queries, as well as communications that lack credibility, are based on mere subjective opinions or unsubstantiated rumors, will be accepted through this channel.

2.3. What information shall I be requested when I report any irregularity?

When you access the Ethical Channel, you need to provide your personal and contact details unless you wish to report anonymously. You will also need to identify the entity where the events took place and the date on which they occurred. It is also important that you identify the people involved as either the person responsible for or the witnesses to the events. The more information you provide, the easier it will be to investigate and resolve the facts.

2.4. Why should I report what I know?

SFSE and SCF Groups promote ethics, responsibility, and transparency. With initiatives such as the Ethical Channel, they foster an environment in which to speak out. This is key to detecting and preventing conduct which may harm the employees, customers or other third parties, as well as both Groups themselves.

2.5. Where do the notifications go? Who may have access to them?

Any incidents directly reported through the Ethical Channel go to a secure EthicsPoint server (NAVEX), which is not part of SFSE or SCF's websites or intranets. This information is accessed by Compliance in each entity who receives and analyses the reports for subsequent management and investigation. Depending on the type of breach, Compliance would assign or work together with relevant area (i.e., HR function).

All employees who are informed of the situations reported through the Ethical Channel are obliged to keep the identity of the person reporting the presumed irregularity strictly confidential.

In case you receive a communication that is subject to the Ethical Channel and you are not authorized to handle it, please note that you should immediately forward it to Compliance, which coordinates the management of the Ethical Channel.

2.6. Do I need to supply evidence of the situation I wish to report?

Even though this is not mandatory, you can include any documents, images, videos or any other information you may have about the reported situation. This will be extremely useful for its management and investigation.

2.7. How is my notification handled after I have sent it? What are next steps?

After you report the situation online, the incident is registered in EthicsPoint's secure server and will be received by Compliance who will designate the person in charge of the investigation.

If the team in charge of the investigation needs further information about the reported situation, you will receive a message through the online platform or in your email (if you provided it to received alerts anonymously) where your notification was registered. Enter your username and password to respond. It is very important that you save the code key and the password to follow up the report since you can use this platform to access and check the status of your notification and to supply new information.

If you have chosen to send your communication by means of a face-to-face meeting with the Ethical Channel managers, please note that they will subsequently include it in the EthicsPoint platform, so that it has all the guarantees of the Ethical Channel, and therefore the above paragraphs will apply.

2.8. How long will the investigation phase take?

Cases received through Ethical Channel must be processed within a maximum of 60 days from receipt of the communication unless the case is especially complex or there are valid reasons to justify extending this deadline by a further 30 days.

If the person in charge of the investigation deems it necessary to gather further information, they will contact you through the Ethical Channel's online platform.

2.9. Should I be worried about reprisals for reporting through the Ethical Channel?

The entity does not tolerate any type of reprisals or threats to the people who, in good faith, use the Ethical Channel to report a fact they become aware of. If the company verifies that an employee was not to observe this commitment, he/she may be subjected to the appropriate measures, including disciplinary penalties.

2.10. For how long will I be able to access the notification I submitted through the Canal Abierto's online platform? If my notification is closed, can I still access it?

You can access your notification at any time. You will be informed about the progress and when it is closed by the person in charge of the investigation.

2.11. Will I be informed of the investigation's result? How?

Enter your code key and password in the Ethical Channel's online platform to view any updates and the status of your notification.

At all events, since this is confidential information, you will not receive any details about the resolution to the reported situation or the potential disciplinary measures, if any, which may have been taken.

3

SECURITY AND CONFIDENTIALITY OF REPORTING

3.1. Every time we report a situation from a work computer a log is generated and archived in the entity's servers. Can I be identified as the person who reported the situation?

The Ethical Channel system uses the EthicsPoint website and does not generate or keep any type of internal connection log with IP addresses. As such, no information will link your computer to the Ethical Channel.

Please bear in mind that you can also access the Ethical Channel from a different computer outside the entity's network using the Ethical Channel's web address.

4 TIPS AND BEST PRACTICES

4.1. Confidentiality or anonymity?

In confidential reporting, you provide details about your identity solely to the people specifically appointed to receive your notification, as well as to the person in charge of the investigation. Your identity may be disclosed to other people when you have given prior consent thereto as part of the internal investigation.

If you are reporting anonymously, we may not have sufficient information to conduct a full investigation. As such, it is important that you supply as many details as possible about the situation or behavior in question. Please bear in mind that you can access the platform and check for messages requesting further information for the internal investigation.

4.2. I'm aware that some people are involved in unethical conduct, but it does not affect me. Why should I bother to report this?

The entity promotes a positive work environment dominated by business ethics, accountability, and transparency.

To uphold these principles, it is essential that you collaborate by reporting situations you become aware of and which breach the legal or internal regulations, including the Code of Ethics.

Reporting this type of situation is vital to detect and prevent conduct which may harm not only the entity, but also its employees, customers and other related third parties.

4.3. What happens if I remember something important about the incident once I have reported it? And what if the entity wishes to ask me further questions?

When you report a situation through the Ethical Channel's website, you receive a unique code key and must enter a password. You can then use these credentials to access to your original notification to the Ethical Channel if you wish to add new details or answer questions requested by the investigators.

4.4. Is my notification followed up on as securely as it was initially reported?

All communications made through the Ethical Channel are as confidential as the initial notification. Also, if you prefer to report the situation anonymously, all your communications through the Ethical Channel will be anonymous unless you say otherwise.