



Code of Ethics

STELLANTIS
FINANCIAL SERVICES

 Santander Consumer Finance

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1/ Our Corporate culture

In the goodness of the Partnership between SFSE and SCF¹, a set of values have been determined to promote responsible business and development.

This ambition is reflected in collective commitments to key stakeholders, including customers, employees, shareholders, partners and the community.

To fulfill the objectives set out in these commitments, all of us must comply with the rules of ethical conduct presented in this Code of Ethics.

These rules cover: 

- Respect for the law.
- Respect for people and the environment.
- Respect for customers.
- Respect for the Joint Ventures and their shareholders.

All employees are expected to apply these rules of ethical conduct in performing their duties. Breach of this Code of Ethics may lead to labour offence sanctions, notwithstanding any sanction under administrative or criminal law that may also result from such breach.



What happens if it is breached?



Failure to comply with any provision of this Code or its implementing regulations may result in disciplinary actions, in addition to administrative or criminal sanctions.

In your day-to-day work, there might be situations where you don't know how to behave. If you need guidance or have any questions relating to any section of the code, please contact Compliance.

If you detect any breaches or irregularities, speak up: you should tell your manager or the appropriate person: Compliance or Human Resources. We are also here to listen to you on the [Ethical Channel](#), which we will explain in further detail in section 3.



2/ Respect for the law

Compliance with laws and regulations

All employees must comply with the laws and regulations of the country in which they work. In particular:

- Abstain from any type of anticompetitive business practice, including cartel arrangements, abuse of dominant position and abuse of economic dependence.
- Refuse all forms of corruption, such as paying or accepting bribes or facilitation payments or granting unwarranted benefits to a public official or private individual.
- Set up the necessary measures to combat money laundering in the financial subsidiaries.
- Comply with international and local tax and customs regulations.
- Comply with labor, environmental and consumer protection laws and regulations.

Non-disclosure of Inside Information

All employees with access to confidential information are expected to keep this information confidential.

Confidential information is specific information about their Joint venture or any of the shareholders group companies that has not been made public and that could have a material influence on the price of the shares of any of the shareholders or on their reputation. This includes information about specific events, as well as financial, strategic or other types of information.

Employees may not use such information for personal gain.

Sincerity of Accounting Data, Information and Indicators

All employees who, in the course of their duties, record or submit accounting or financial data, calculate and transmit indicators or manage and circulate any other type of information **are expected to ensure that are reliable and sincere.**

Reporting of this data must **comply with the Partnership's accounting principles and management standards.**

3/ Respect for the People and the Environment

Respect for fundamental Human Rights

All employees contribute to the Partnership's commitments regarding fundamental human rights. They undertake to prohibit child labor and forced labor and to respect freedom of association and the right to representation.

Employees are expected to respect these rights in their areas of responsibility and require the same level of respect from their partners and suppliers.



Respect for the Environment

While performing their duties, all employees contribute to the environmental policies and commitments agreed by both shareholders. They are expected to comply with those guidelines on preserving natural resources and managing waste and are asked to ensure that partners and suppliers comply with similar requirements.

Ethical Channel - Communications

Any Joint venture's employee who becomes aware of the committing of an allegedly unlawful act or a breach of this Code of Ethics or of the sectoral codes or manuals may use the whistleblowing process implemented at each unit and notify the officer designated for managing Whistleblowing alerts.

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Compliance with Workplace Health and Safety Rules

All employees are expected to be familiar and comply with applicable safety rules and ensure that others comply as well, in accordance with the requirements of the Workplace Health and Safety System.

Special care should be given to the working conditions and wellbeing of all persons present at the Joint Ventures sites. As concerns prevention, employees are expected to

- 1) set an example, by strictly applying safety rules themselves and ensuring that others do the same,
- 2) remain vigilant at all times, to identify and manage risks
- 3) act swiftly, to ensure that risky situations are addressed immediately.

Speak up!!



Prohibition of discrimination, harassment and disrespectful behaviour, respect for private life

All employees are expected to act respectfully towards their team members, other employees and, more generally, all individuals with whom they are in professional contact.

They are expected to respect the private lives of other individuals and refrain from spreading information they may have gained by chance or in the course of their work.

All managers should respect their team members' private lives.

The Partnership **prohibits all types of discrimination** based on age, gender, nationality, marital status, sexual orientation, lifestyle, genetic characteristics, real or supposed belonging to an ethnic group, nation or race, physical appearance, pre-existing health conditions or disability, pregnancy, name, political opinion, religious conviction or union activities.

Employees shall uphold a working environment which is compatible with personal development, helping the people in their teams to balance in the best way possible their work requirements with their personal and family needs.

Both shareholders consider that the occupational health and safety of the employees of each of the Joint ventures are fundamental to achieve a comfortable and safe working environment, the constant improvement of working conditions being a priority objective.

4/ Respect for Customers

Sincerity of Consumer Information

All employees are expected to provide customers and consumers with truthful, non-misleading information about the features of the Joint Ventures products and services. This rule applies to advertising, marketing and sales.



Confidentiality of Customer Data

Employees must never disclose or use any private information about customers or prospective customers that they may obtain in the course of their work for any purpose other than that authorized by said customers or prospective customers.

Employees are expected to comply with current laws and regulations in processing customer data and ensure data security and respect for individuals.

5/ Respect for the Joint Ventures and their Shareholders

Limits on Gifts and Invitations

Employees may not solicit gifts directly or indirectly. They must **refuse all gifts with a value that exceeds what is generally accepted or that could compromise their independence**. All gifts with a value exceeding €50 must be approved by a supervisor and employees must report any gifts received to their supervisors on a regular basis. This rule also applies to invitations to non-job-related seminars or trips.

The handing-over, promise or offer of any type of payment, commission, gift or remuneration to any authorities, public officials or employees or officers of Government owned companies or public bodies is forbidden, whether made to them directly or indirectly through persons or companies related to them and where the public official or public employee in question, or another person indicated by the latter, is the intended recipient. This prohibition refers to authorities, public officials or employees in any country.

The use of agents, intermediaries or advisors in transactions or contracts involving any government department, public body or other Government owned company in any way shall require the adoption of the following measures:

1. Whenever possible, institutions of renowned prestige in the market or sector in question **shall be used as agents, intermediaries or advisors**, and if possible, first-rate companies, especially when the remuneration of the agent, intermediary or advisor is linked to the success of the transaction or contract.
2. **Due diligence mechanisms** will be implemented to become acquainted, as far as is reasonably possible, with the participating persons and their associates, for the most suitable to be chosen, reasonably ensuring that they are trustworthy and therefore do not undertake any activity that could involve risk or economic prejudice or could compromise the Joint ventures or their shareholder's reputation and good image.
3. **The agent, intermediary or advisor finally selected will be informed of the prohibitions established in this chapter**. The agreements signed with agents, intermediaries or advisors will include clauses which expressly and specifically state such prohibitions.

Transparent relations with competitors, customers and suppliers

All employees are expected to **avoid conflicts of interest**. A conflict of interest arises when an employee, one of his or her family members or friends is in a position to benefit personally from a transaction carried out in a Joint Venture's or shareholders' name, notably with customers or suppliers.

Employees are barred from acquiring interests in suppliers or customers, unless the acquisition consists in the purchase of listed shares as part of a managed portfolio, in compliance with the **rules prohibiting the use of inside information**.

Suppliers are to be selected based on clear decision-making procedures and objective criteria. Employees are expected to put the Joint venture's interests first in negotiations with suppliers, in compliance with the law and principles of fairness.



Use and Protection of Corporate assets

All employees are responsible for using corporate assets and resources properly and exclusively in connection with their professional duties. Corporate assets are to be used in compliance with the company's current rules and procedures and all necessary measures are to be taken to prevent any damage, theft or unauthorized use by a third party.

Employees are expected to protect the Joint Venture from the risk of fraud or misappropriation of assets by implementing the requisite controls within their area of responsibility. All employees are barred from using their status or authority to benefit from any type of favoritism or special advantages.

Respect for Confidentiality

All employees are expected to take the necessary measures, in accordance with the company's current rules and procedures, to protect the confidentiality of professional information in their possession.

Examples include information on new vehicle projects; strategic, industrial, financial or labor data; and, more generally, any information whose disclosure could be harmful to the Partnership or to any of the shareholders's interests.

Representative of the Company

All employees represent the Joint Ventures image and shareholders brands. As a result, they are expected to refrain from disparaging the partnership, its strategies, executives and products. They are expected to conduct themselves in a way that reflects the Partnership values during conversations, seminars and other events at which they represent the JV Company, Partnership, or the respective Shareholders and their Brands.

Presentations prepared for events should provide truthful information while complying with confidentiality requirements and promoting the company's image.

Clear separation between work and political activities

All employees involved in political activities do so as private citizens during their free time and away from the workplace.

If, as part of those activities, they mention their employment by the JV Company, Partnership, or the respective Shareholders and their Brands, they must make it clear that they do not represent it in any way.

The Joint Ventures should not make financial contributions to political parties.

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