



## **Fiat Group Export Controls Compliance Guidelines**

### **Forward**

It is the policy of Fiat to fully comply with EU, U.S. and other laws and regulations governing international trade as they apply to Fiat. It is the responsibility of all Fiat employees to ensure that under no circumstance transactions occur contrary to Fiat's policy of full compliance. Fiat employees are required to seek advice from the Legal Department if they have any questions or concerns about compliance with the applicable export control laws and regulations.<sup>1</sup>

### **Exports**

International trade controls, including export regulations, are designed to protect the national security and foreign policy interests of governments that impose export control requirements. These laws and regulations cover the export and re-export of products, services, software, technology, and technical data, sanctions, and antiboycott requirements. Exports include physical exports as well as electronic exports of data, software, and technology. Additionally, certain transits, brokering activities and technical assistance (trainings, repair, etc) can be subject to export controls. In the context of U.S. export control law, exports also include technical data transfers to foreign nationals in the United States, disclosures of U.S. technical data in a foreign country to persons of a third country nationality, re-exports of U.S. origin items from one foreign country to another, and exports of foreign-made items that incorporate more than 10% U.S. content. Certain U.S. trade controls apply not only to Fiat's U.S. operations but also to Fiat's non-U.S. businesses.

### **Country Prohibitions**

The export controls of the European Union (EU) and the Member States apply to transactions involving certain countries subject to embargoes and controlled individuals.

Restrictive measures imposed by the EU may target governments of third countries. These prohibitions also apply to undertaking work in or selling products to any entity that is located in any of these countries, or to any entity that is owned or controlled by the government of any of these countries, regardless of where the entity is located. They may include arms embargoes, other specific or general trade restrictions (import and export bans), financial restrictions, restrictions on admission (visa or travel bans), or other measures.

For the current status of EU sanctions:

<http://www.ec.europa.eu/externalrelations/cfsp/sanctions/docs/measuresen.pdf>

For the EU consolidated list of persons, groups and entities subject to EU financial sanctions:

<http://www.eeas.europa.eu/cfsp/sanctions/consol-listen.htm>

Violations of these controls can result in heavy financial penalties and severe reputational damage for business, coupled with the risk of criminal sanctions being imposed against management and executives.

The U.S. imposes sanctions on a number of countries in which U.S. persons and companies or companies controlled by U.S. entities or individuals located in the territory of the U.S. may not do business. The Office of Foreign Assets Control (OFAC) of the United States Department of Treasury frequently modifies the list of countries and/or the degree of restrictions in place with respect to any such country.

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<sup>1</sup> Chrysler Group LLC has adopted its own Export and Sanctions Compliance Policy, designed to ensure full compliance with applicable laws and regulations



Updated information in this respect can be found at:

<http://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx>.

From time to time, other countries may be added to the OFAC list, and accordingly, it shall be the responsibility of each employee to consult with the Legal Department if there are any questions in respect to a particular jurisdiction.

It is FIAT's policy that FIAT shall not, in any form, do business in violation of U.S. embargoes or sanctions applicable to Fiat's activities.

In addition, other countries in which Fiat conducts business may impose similar trade sanctions and restrictions with respect to one or more of the same or other countries.

### **Entity Prohibitions**

The EU and the U.S. and other governments maintain several lists of entities with whom their companies cannot do business, and Fiat employees involved in international trade should routinely check those lists when doing international trade business (please refer to the links in point "Country Prohibitions"). If any employee or agent of the Company has reason to believe that any export or re-export may be intended for an inappropriate end-use, end-user, or destination, or the consummation of such export or re-export may be in violation of applicable EU or U.S. or any other export control laws, such person shall halt the transaction and contact Legal Department in order that the Company may conduct due diligence.

### **Antiboycott Regulations**

In addition, the U.S. enforce anti-boycott regulations, which prohibit the transaction of any business that would support the Arab boycott of Israel. While not as common, the U.S. antiboycott regulations also prohibit the transaction of business that would support any country's boycott of any other country unless the underlying boycott is consistent with U.S. law.

### **Employee Responsibilities**

Strict compliance with international trade controls applicable to Fiat's activities is a priority for Fiat. Violations of the legal requirements could subject Fiat and its employees to criminal penalties, civil penalties, including large fines, the loss of export privileges and debarment. Non-compliance with the applicable rules by Fiat employees could result in corporate discipline, including dismissal.

Each employee is required to understand and comply with the export laws and regulations as they apply to his or her job activities. The Legal Department is available to provide guidance, and Fiat employees should contact this office if they have any questions or concerns about compliance with applicable export control laws and regulations.

The Legal Department shall establish and maintain a continuing program to keep employees advised of the applicable provisions of the export control laws, regulations and requirements. Any employee with a question concerning applicable export control laws and regulations shall refer the question to the Legal Department.

This policy shall be reviewed by the Legal Department on an annual basis and amended as necessary.

Approved: Board of Directors Meeting of 2 May 2014