

Speak-up Policy

1. PURPOSE / SCOPE	2
1.1. Purpose	2
1.2. Scope.....	2
2. ORGANIZATION UNITS AFFECTED	2
3. POLICY STATEMENT.....	2
4. GENERAL PRINCIPLES.....	3
4.1. Reference	3
4.2. Definitions.....	3
4.3. Principles.....	4
4.3.1. Open door policy.....	4
4.3.2. Reporting channels	4
4.3.3 Anonymous reporting	5
4.3.4 Confidential information.....	5
4.3.5. Non retaliation policy.....	5
4.3.6. Data privacy	6
4.3.7. Data retention.....	6
5. PRACTICE	6
5.1. Case management system	6
5.2. Allocations of cases to authorized organizations	6
5.3. Assessments and Internal Investigations.....	7
5.4. Assessments and Internal Investigations of Company Officers.....	8
5.5. Investigation Report.....	8
5.6. Disciplinary measures	8
6. VIOLATION OF THIS POLICY.....	9

1. PURPOSE / SCOPE

1.1. Purpose

ST is committed to conduct business with integrity, respect, and fairness, in line with the values and principles described in its Code of Conduct and applicable laws.

Any ST Employees or Interested Third Parties (as defined in Section 4.2 below) who observe a conduct that seems to (or does) violate or deviate from the values and principles set forth in ST's Code of Conduct, policies, procedures and/or applicable laws (together a "Concern") are encouraged and expected to raise the issue forward and speak up, as described in this policy. By doing so, ST Employees and/or Interested Third Parties will give the Company an opportunity to identify and address the issue (whereas remaining silent about it may worsen the situation, undermine trust, and expose the Company and/or its employees to liabilities).

With the above in mind, the purpose of this policy is to:

- explain how ST Employees' and/or Interested Third Parties may report any Concerns;
- describe the process which will be followed by the Company when receiving such Concerns (including case management and allocation, assessment, investigation, and associated outcomes); and
- ensure that ST Employees and/or Interested Third Parties who speak up pursuant to the principles set out in this policy are protected against any forms of retaliation.

1.2. Scope

This policy applies to all reported Concerns worldwide, as may be received from time to time by the Company, as well as related Assessments and Investigations in relation thereof.

2. ORGANIZATION UNITS AFFECTED

STMicroelectronics N.V. and its affiliated companies worldwide (together "the Company" or "ST").

3. POLICY STATEMENT

- a. The Company's management strives for the cultivation of a "speak up" culture among ST Employees and Interested Third Parties, allowing everyone to express any Concerns they might have that any of the Company's employees, officers, managers and/or business partners might not be adhering to the Company's standard of business ethics, as expressed in ST's Code of Conduct, policies and/or applicable laws.

- b. The Company encourages and expects ST Employees and Interested Third Parties to raise any Concerns, using one of the channels made available by the Company, as described in Section 4.3.2 below.
- c. The Company prohibits any forms of retaliation against anyone reporting Concerns and/or becoming a witness in, or otherwise contributing to, any Assessment and/or Internal Investigation pursuant to this policy.
- d. The Company shall take all Concerns received pursuant to this policy seriously, and appropriate confidentiality measures shall be undertaken when dealing with any such Concerns (in order to protect legitimate interests of all involved individuals and the integrity of the investigation).
- e. After a Concern is reported, regardless of the reporting channel chosen by the Whistleblower, the Chief Compliance & Ethics Officer (“CCO”) and the Chief Audit & Risk Executive (“CA&RE”) shall be immediately informed and will ensure that: (i) an Assessment of the reported situation is conducted promptly, and (ii) when deemed appropriate following such Assessment, an Internal Investigation will be opened; all as further described in Section 5 below.

4. GENERAL PRINCIPLES

4.1. Reference

ST Code of Conduct

4.2. Definitions

“**Concern**” refers to any observed or reported behavior and/or practice that seems to (or does) deviate from or violate the values and principles described in ST’s Code of Conduct, policies, procedures, and/or applicable laws (i.e., a suspected misconduct or possible breach), which is raised by any ST Employees or Interested Third Parties using any one of the reporting channels made available by the Company.

“**Assessment**” means preliminary high-level investigation steps, focusing on factual elements of the case, which is meant to determine: (a) the likely nature of the case, (b) whether a formal Internal Investigation needs to be opened, and (c) whether any immediate protection and/or conservatory measures need to be taken.

“**Internal Investigation**” means formal inquiry and related investigation steps, conducted by duly authorized personnel of either the office of the Company’s CCO or CA&RE. Internal Investigation(s) may also, from time to time, be assigned to and conducted by another ST organization or, whenever a specific situation so requires (e.g. required skills, resource constraints, independence, etc.) the Internal Investigation may be outsourced to an independent third party expert, provided in all cases that a formal delegation, on a case-by-case basis, has been provided by CCO and /or CA&RE to such other organization or third party expert.

“**ST Employee**” means an employee of ST, whether permanent, contract workers or temporary, regardless of their positions and/or seniority in the Company.

“**Interested Third Parties**” means any persons, other than ST employees, raising a Concern through any of the reporting channels described in this procedure. Interested Third Parties may include employees of business partners such as vendors, customers, distributors, JV partners, etc.

“**Whistle-blower**” means any ST Employees or Interested Third Parties raising a Concern through any of the reporting channels described in this policy.

4.3. Principles

4.3.1. Open door policy

The Company’s officers and managers shall at all times maintain a working atmosphere within their teams in which employees feel comfortable speaking up, asking questions and expressing their Concerns freely.

All Concerns reported pursuant to this policy shall be taken seriously. The Company expects and values the help of ST Employees and/or Interested Third Parties to report such Concerns.

As long as an ST Employee and/or an Interested Third Party has a reasonable ground to believe that the information concerning the reported Concern is true, then he/she will be covered by the non-retaliation protection set out in Section 4.3.5 below, regardless of whether he/she is mistaken, or whether the matter cannot be substantiated. Any forms of retaliation against a Whistle-blower shall be treated as a violation of ST Code of Conduct and, as such, will lead to appropriate disciplinary measures against the involved wrongdoer(s).

4.3.2. Reporting channels

ST Employees and Interested Third Parties are encouraged to share their Concerns using one of the following channels:

- a. **Ethics hotline:** The ethics hotline is available 24 hours a day and 7 days a week. The link to the ethics hotline can be found among others on the Compliance, Ethics & Privacy webpage available on the Company’s intranet be.ST (<https://stmicroelectronics.sharepoint.com/sites/Compliance>) and website ST.com (https://www.st.com/content/st_com/en/about/st_company_information/code-of-conduct.html).

The ethics hotline is managed by an independent qualified third party on behalf of ST. When a report is received on the ethics hotline, the ethics hotline operator will promptly notify both CCO and CA&RE of the received Concerns, and the procedure described in Section 5 below will then apply.

- b. **CCO and CA&RE:** ST Employees and Interested Third Parties can always choose to report confidentially their Concerns directly to the Chief Compliance & Ethics Officer (CCO) and/or Chief Audit & Risk Executive (CA&RE), or their respective regional delegates, and the procedure described in Section 5 below will then apply.

- c. **Selected Managers:** Alternatively, ST Employees can also report their Concerns to either the relevant: (i) country manager; (ii) site manager; and/or (iii) regional, country or site Human Resources manager. In that case, the manager(s) receiving such Concern(s) shall report any such Concern(s) without delay to the CCO and CA&RE and the procedure described in Section 5 below will apply.

Any Concerns regarding either the President and Chief Executive Officer, the Chief Financial Officer, any member of the Executive Committee (Presidents), the CCO and/or the CA&RE should be reported directly through the ethics hotline referred to in (a) above. In these cases, the ethics hotline operator will promptly notify the Chair of the Supervisory Board and the Chair of the Audit Committee of the received Concerns, and the procedure described in Section 5.3 below will then apply.

4.3.3 Anonymous reporting

ST Employees and/or Interested Third Parties who wish to report any Concerns but who also wish to remain anonymous, are invited to use the ethics hotline referred to in Section 4.3.2(a) above.

Anonymous reporting is available through the ethics hotline, upon request by the Whistleblower. When an anonymous report is made, the ethics hotline's operator is contractually committed and will not disclose the identity of the Whistleblower to CCO nor CA&RE (nor otherwise to the Company) and the Company will not attempt to discover the identity of the Whistleblower.

4.3.4 Confidential information

To protect ST Employees and/or Interested Third Parties, and to preserve the integrity of related investigations, the Company and all involved personnel shall apply - at all applicable times - the highest standards of confidentiality in the handling of all reports, related assessment and investigation steps.

All communication and information received in connection with any Concerns reported pursuant to this policy, including all information obtained during the Assessment and/or Internal Investigation, shall be treated as strictly confidential and may be shared only on a strict need-to-know basis.

4.3.5. Non retaliation policy

It is the Company's policy to ensure that no retaliation or adverse action may be taken against any Whistleblowers who report Concerns, whether such Concerns ultimately prove to be substantiated or not.

Any forms of retaliation (including, but not limited to, intimidation, mobbing, bullying or adverse employment consequences) shall be covered by the foregoing general prohibition.

Any ST Employee or Interested Third Party who believes he/she is being retaliated against should promptly inform the Company, using one of the reporting channels described in Section 4.3.2 above.

Retaliation shall always be deemed a serious violation of ST's Code of Conduct and will be investigated as such and, if confirmed, concerned wrongdoers will be subject to appropriate disciplinary measures, up to and including termination of employment.

4.3.6. Data privacy

In line with applicable privacy laws, Whistleblowers have a right of access, rectification, erasure, restriction of processing (and notification in relation thereto) of their personal data. Nevertheless, Whistleblowers are informed that by virtue of data privacy laws and this Policy, one or several of these rights may be restricted for a temporary period, as may be necessary to protect the integrity of any applicable Assessments and/or Internal Investigations. Any restrictions, as applicable, will be limited in time, proportionate and respectful of Whistleblowers' and other individuals' privacy rights. The restrictions, if any, will be lifted as soon as the circumstances justifying such restrictions are no longer applicable.

4.3.7. Data retention

When targeting one or more identified ST Employee(s), Concerns reported through any of the channels described in Section 4.3.2 above should not be recorded in the concerned ST Employee's HR records or "personal file" (together the "employee file"), unless the following 3 cumulative conditions are met:

- such Concerns are found to be substantiated by the corresponding Internal Investigation(s);
- the findings of the Internal Investigation(s) are serious enough to trigger disciplinary sanction(s) against the targeted ST Employee(s), which sanction(s) will be recorded in the employee file; and
- recording in employee files are allowed by applicable local laws.

The Company may store the case related data as long as it is necessary for the processing of the reported Concern(s) or when it is required by applicable laws or regulations (e.g., to fulfil legal obligations, such as retention obligations). At the end of the retention period, such data will be deleted, blocked, or anonymized.

5. PRACTICE

5.1. Case management system

- a) Every and all Concerns received through the channels described under Section 4.3.2(c) above, shall be immediately reported by the concerned manager(s) to CCO and CA&RE;
- b) Every and all Concerns received through one of the channels described under Section 4.3.2(a), 4.3.2(b) or 4.3.2(c) above, shall be logged without delay in the dedicated and secured case management platform managed by CCO and CA&RE (or their delegates); and
- c) An acknowledgement of the receipt of the reported Concern(s) shall be given to the Whistleblower within 7 days following such report.

5.2. Allocations of cases to authorized organizations

All reported Concerns shall trigger the opening a "case" in the dedicated case management platform referred to in Section 5.1 above.

Unless duly authorized in advance by CCO and/or CA&RE, Whistle-blowers and/or ST Employees shall never conduct themselves (directly or indirectly) any form of assessment or investigation steps in relation to any Concern(s). However, Whistleblowers are expected to report and share as much specific information as

possible and, as applicable, any evidence in their hands to ease and/or allow a proper Assessment of the reported Concern(s).

The allocation of a case will trigger and provide clear mandate to the authorized ST organization in order to perform the corresponding Assessment and/or Internal Investigation, as described in Section 5.4 below. It is based, inter alia, on the anticipated nature and suspected impact of the reported Concern(s).

The cases are usually allocated to, and associated Assessments and Internal Investigations are conducted by trained employees of either the Corporate Compliance & Ethics or the Corporate Audit functions within the CCO or the CA&RE organizations, respectively, which are deemed adequately skilled with investigative techniques and data protection rules.

- a) Concerns having an impact on the Company's reporting and disclosure obligations, including misappropriation of tangible and/or non-tangible assets (including confidential and proprietary information) and fraudulent statements (including financial and non-financial information) will usually be allocated to the Corporate Audit function;
- b) Except for (a) above, Concerns related to breaches of the Code of Conduct will usually be allocated to the Corporate Compliance & Ethics function, unless otherwise agreed between CCO and CA&RE;
- c) Cases may also be delegated to duly trained personnel(s) of another ST organization, provided that a formal delegation, on a case-by-case basis, has been entrusted by CCO and/or CA&RE to such other organization;
- d) Finally, CCO and/or CA&RE may outsource (in whole or in part) the Assessment and/or Internal Investigation to an independent third-party expert.

5.3. Assessments and Internal Investigations

(a) Assessments:

All reported Concerns shall be taken seriously and assessed prior to the opening of an Internal Investigation.

The Assessment shall be done promptly and will consider the circumstances of the case, factual elements available, as well as the information (and related evidence, if any) provided by the Whistle-blower or otherwise collected.

The Assessment phase shall determine: (i) the nature of the case; (ii) whether an Internal Investigation needs to be conducted; and (iii) whether immediate and interim protection and/or conservatory measures need to be taken.

(b) Internal Investigations:

The purpose of the Internal Investigation is to determine whether the reported Concerns (including associated allegations and/or red flags) can be substantiated and consequences thereof (as further described in Sections 5.5 and 5.6 below).

Internal Investigations shall be conducted in a fair, fact-based, objective, and professional manner. Internal Investigations shall not be used for any other purpose than to ascertain the credibility of reported Concerns.

Internal Investigations shall be completed within a reasonable time frame (generally within a period of 3 months).

(c) Information:

The Whistle-blower shall be informed of the status of the Assessment and/or Internal Investigation.

5.4. Assessments and Internal Investigations of Company Officers

Whenever the Chief Financial Officer, , the General Counsel, the President Human Resources, any other member of the Corporate Executive Committee, the Chief Compliance Officer and/or the Chief Audit & Risk Executive is (are) the subject of a reported Concern, the associated Assessment and/or Internal Investigation shall be led by the Chairperson of the Audit Committee of the Supervisory Board (who may decide to delegate the Assessment/Internal Investigation to an independent third-party expert or, if appropriate, to either the CCO or CA&RE if they are not themselves the subject of the reported Concern).

Whenever the Chief Executive Officer is the subject of a reported Concern, the associated Assessment and/or Internal Investigation, shall be led by the Chair of the Supervisory Board of STMicroelectronics N.V. (who may decide to delegate the Assessment/Internal Investigation to an independent third-party expert).

5.5. Investigation Report

The outcome of Internal Investigations shall be formalized in a written and documented investigation report, which shall include at least the following information:

- a. Scope and objectives of the investigation,
- b. Timing and summary description of the procedures conducted,
- c. Findings from the investigation,
- d. Recommendations and proposed follow-up action plan (including suggested disciplinary measures, where applicable).

5.6. Disciplinary measures

Disciplinary measures shall be proportionate to the misconduct at stake, based on the circumstances of the case, nature of the misconduct, consequences thereof and other relevant considerations (such as severity, intention, past cases, seniority of the wrongdoer, etc.). Disciplinary measures may include, without limitations, oral warning, written warning, mandatory training, demotion, termination of employment, and/or any other measure(s) deemed appropriate given the circumstances of the case.

Based on findings and recommendations included in the Internal Investigation report, whenever appropriate, disciplinary measures, as described above, shall be taken against individual employees and/or third parties involved in substantiated wrongdoing(s).

6. VIOLATION OF THIS POLICY

The provisions and principles included in this policy are mandatory. Any violation of this policy will result in appropriate disciplinary measure(s), up to and including termination of employment.