



1. APPLICATION

The Electronic Monitoring Policy (the "Policy") applies to all Vari-Form Manufacturing Inc. Canada Inc. ("Vari-Form") (the "Company"), employees, full time, part time, casual, fixed term, remote, probationary, on leave of absence, or layoff.

2. PURPOSE

The purpose of this Policy is to provide all employees with details as to how the company may monitor employees electronically, and the purposes for which applicable information collected through electronic monitoring may be used.

3. SCOPE

This policy applies to all components of FCA Canada Inc.

4. DEFINITIONS

- "ICT Devices" includes all the information and communication technology assets (e.g. computers, tablets, cellular phones, printers, etc.) made available to users by the Company for performing their professional activities and extends to authorized access to online workspaces, messaging, intranet, internet, ICT applications and files of the Company.
- "Company Communications" means any communications sent or received (i) on a Company Device or (ii) via any channel connected to an employee's employment including their Company email address, any account associated with a Company email address, a Company phone or fax number, and any internal messaging systems used by the Company. As the list of work-related communications is inclusive, and not exhaustive, other types of work-related communications could also fall under this definition.
- "Electronic Information" means any information or document created by an employee using a company device, including but not limited to, data, internet history, digital archives, messages, multimedia data, and files.

5. POLICY STATEMENT

- 5.1 To ensure appropriate and proper use of ICT devices, Company Communications, and Electronic Information the Company reserves the right to carry out checks and investigations to ensure compliance.

The Company may probe and examine the nature of the information circulating on its networks and hardware that are provided to its employees. In the presence of indications of use of ICT Devices that do not comply with the provisions of existing policies/procedures (see related policy statements below), the Company may proceed to a detailed examination of the content of the information and software present on the ICT Device. Since this information is presumed to be professional, an examination may be carried out without the employee's presence except in cases where the employee has explicitly identified the information as personal. In the latter case, an examination will be done in the presence of the user unless there is a particular risk or special event. In the event Vari-Form determines there is non-compliance with company policies, a disciplinary process may be brought against the user concerned.

- 5.2 The Company reserves the right from time to time to install and operate such surveillance systems in our facilities, including cameras, that it from time to time deems appropriate in order to ensure the safety and security of its employees and property.
- 5.3 The Company reserves the right to use electronic timecard monitoring for security, threat detection, attendance management and in ensuring employee safety.



5.4 Expectation of Privacy

- Subject to 5.1 through 5.3 above, all Company Communications and Electronic Information are subject to monitoring and review without notice and employees should not have any expectations of privacy when sending or receiving Company Communications or creating, preparing, saving or otherwise using Electronic Information.
- The Company reserves the right to access a Company Device, either directly or remotely, for the purpose of monitoring or reviewing any Company Communications and Electronic Information.
- Any personal information obtained by electronic monitoring will be treated and used in accordance with applicable privacy laws.

6. REFERENCE

- Vari-Form’s Internet, E-Mail, Computer and Cell phone use policy
- Vari-Form’s Standard of Conduct
- Stellantis Corporate Information Protection Policy
- FCA Canada Inc. Privacy Statement

7. REVISION CONTROL

REV. DATE	REV. LEVEL	DESCRIPTION OF CHANGE
Oct 11, 2022	A	New policy