

Stellantis N.V.
Taurusavenue 1
2132 LS Hoofddorp
Netherlands

Brussels,

Re: Demand for compensation on behalf of consumers in Euroconsumers countries following admissibility order by the Tribunal of Turin

Dear Mr. Zimmermann,

We are writing to you on behalf of the consumers in the Euroconsumers¹ countries, namely Italy, Belgium, Spain, and Portugal, concerning the widespread issues arising from defective Takata airbags installed in Citroen C3 and DS3 vehicles produced between 2009 and 2019.

We refer to the Admissibility Order (see attached) issued by the Tribunal of Turin on April 14, 2025 against Groupe PSA Italia Spa, Stellantis N.V., and Automobiles Citroen SA, registered under No. R.G. 13711/2024. This order has declared admissible the class action lawsuit in Italy concerning the aforementioned defective airbags and the handling of the subsequent recall campaign.

The Tribunal of Turin has acknowledged the non-manifest unfoundedness of the claim, highlighting that Stellantis (and its related entities) were aware of the risks associated with the Takata airbags since at least 2019 but initiated the recall campaign in Italy with significant delay, only commencing in May 2024. Furthermore, the Tribunal noted the inadequacies in the execution of the recall campaign, including insufficient information provided to consumers regarding replacement vehicles and repair timelines.

The Euroconsumers group represents a substantial number of consumers across Italy, Belgium, Spain, and Portugal who have been directly affected by the issues identified in the Admissibility Order. These consumers have suffered considerable inconvenience, potential safety risks, and financial losses due to the delayed and inadequate handling of this critical safety issue.

¹ Gathering five national consumer organisations and giving voice to a total of more than 1,5 million people in Italy (Altroconsumo), Belgium (Test Aankoop), Spain (OCU), Portugal (DecoProteste) and Brazil (Proteste), Euroconsumers is the world's leading consumer cluster in innovative information, personalised services and defence of consumer rights. Our European member organisations are part of the umbrella network of BEUC, the European Consumer Organisation. Together we advocate for EU policies that benefit consumers in their daily lives

In light of the Admissibility Order from the Tribunal of Turin, we hereby formally demand that Stellantis N.V. take immediate steps to provide fair and adequate compensation to all affected consumers within the Euroconsumers countries. This compensation should address the damages incurred due to the delayed recall and the disruption caused by the unavailability of their vehicles.

Notwithstanding this formal demand, and in the supreme interest of the consumers we represent, we express our willingness to engage in an amicable meeting with your representatives to explore the possibility of reaching a resolution to this matter without further protracted legal proceedings. We believe that a constructive dialogue can lead to a mutually acceptable solution that prioritizes the rights and interests of the affected consumers.

We look forward to your prompt response to this letter and your proposal for a meeting at your earliest convenience.

Yours faithfully,

Marco Scialdone
Head Of Litigation
Euroconsumers

Exhibit 1: Tribunal of Turin, April 14, 2025 R.G. 13711/2024, admissibility order .