# IVECO•GROUP

Company Iveco Group	lveco Group N.	Iveco Group N.V. Conflict Minerals Policy	
Function	Version	Effective Date	Pages
Legal & Compliance	1.0	May 2023	2

**Scope:** This Policy applies to Iveco Group N.V. and its subsidiaries (collectively, "Iveco Group" or the "Company") and the directors, officers and employees of such entities as well as those acting for or on behalf of such entities (collectively, "Covered Persons"). For avoidance of any doubt, this Policy applies to Iveco Group and its business relations with suppliers, sales representatives, consultants, distributors, joint ventures, and joint venture partners ("Commercial Intermediaries")

**<u>Purpose</u>**: This Policy assigns responsibilities and establishes procedures designed to ensure full compliance with Conflict Mineral Regulation (EU) No. 2017/821.

**Definitions:** "**3TG**" means tin, tantalum, tungsten and gold.

## Policy:

## <u>Background</u>

Concern that proceeds from mining and trade of certain minerals in certain politically unstable areas of the globe can be used to finance armed groups, lead to forced labour and other human rights abuses, and support corruption and money laundering led the European Union to enact Regulation (EU) No. 2017/821 (the "Conflict Mineral Regulation") requiring European companies to report publicly on their use of "conflict minerals" (and namely 3TG) in the products they manufacture.

The Conflict Mineral Regulation requires the Company to conduct an inquiry into the origin of 3TG sourced from its supply chain; if 3TG come from Conflict-Affected and High-Risk Areas ("CAHRA"; ref. https://www.cahraslist.net/), or if their country of origin is uncertain, then the Company will have to conduct a more thorough review of its supply chain in an attempt to determine whether such minerals used by the manufacturer support armed groups in any CAHRA.

This policy is not intended to ban procurement of 3TG or other products from a CAHRA, but to promote sourcing from responsible sources in the region.

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#### Iveco Group's Commitment:

1. To carry out its supply chain due diligence consistent with the international responsible sourcing standards set by the Organization for Economic Cooperation and Development (OECD) guidelines.

2. To make reasonable efforts: a) to know, and to require each lveco Group supplier to disclose, whether 3TG are contained in the products it supplies to the Company; b) if 3TG are contained in the products purchased from such suppliers, to identify the source of 3TG, c) to eliminate procurement, as soon as commercially practicable, of products containing 3TG obtained from sources that fund or support inhumane treatment in a CAHRA.

3. To require lveco Group suppliers to assist the Company to comply with the supply chain due diligence obligations set forth in the Conflict Minerals Regulation also by providing the needed information via the Conflict Minerals Reporting Template set forth by RMI (https://www.responsiblemineralsinitiative.org/).

In order to meet their requirements under this policy, Iveco Group expects that its suppliers perform a reasonable inquiry into the existence and origin of 3TG in their supply chains and provide written evidence of the due diligence performed.

lveco Group will avoid future business with suppliers which are non-compliant with this policy.

### Additional Information

Concerns and violations of this policy can be reported to Iveco Group using Iveco Group's Compliance Helpline

https://www.ivecogroup.com/group/governance/compliance\_helpline,

through which any person may make an anonymous report of any ethical or compliance concern.