

# I V E C O • G R O U P

<b>Company</b>  Iveco Group	<b>ANTI-HARASSMENT POLICY</b>	
<b>Function</b> Legal & Compliance Human Resources	<b>Effective Date</b> January 2022	<b>Pages</b> 3

**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”).

This Policy applies to both on-site and off-site locations, such as at clients’ offices, events and travel locations, and is applicable in all work-related settings, including business trips, meetings, events, and social events related to the Company and Company business.

**Purpose:** Iveco Group is committed to provide a safe and inclusive work environment where everyone is treated with dignity, fairness and respect and can develop to their best potential.

This Policy is intended to supplement our Iveco Group Human Rights Policy helping Covered Persons in creating and maintaining a positive culture of inclusivity and respect in the work environment. This Policy also is intended to increase Covered Persons’ awareness about workplace harassment, discrimination, bullying and retaliation so they are able to recognize its different forms, work to prevent it, and promptly react to any instances of suspected harassment.

**Policy:** Iveco Group prohibits any form of workplace harassment, sexual or otherwise, discrimination, bullying or retaliation. This includes, but is not limited to, harassment and discrimination based on race, color, age, sex, religion or beliefs, national origin, ancestry, sexual orientation, gender identity, reassignment, or expression, marital or civil partnership status, mental or physical disability, or any other characteristics protected by applicable law.

Our Policy of non-discrimination in employment applies to recruitment, hiring, compensation, promotions, transfers, discipline, demotions, terminations, layoffs, access to benefits and training and all other aspects of employment.

Harassment - which can take many forms - is defined as any unwelcome conduct (physical, psychological, verbal or non-verbal) toward an individual that creates an intimidating, hostile or

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offensive or abusive environment, or any situation where enduring such conduct is a condition of employment. Harassment can be one severe incident or a series of less severe incidents.

Understand that what may be acceptable behavior to some people may not be acceptable to others and what you may consider to be a harmless joke or prank may be offensive and degrading to a colleague.

Harassment may include the following types of conduct:

- unwelcome sexual advances or invitations;
- threats or demands that a person submit to sexual requests as a condition of continued employment, more favorable work conditions or to avoid some other loss,
- offers of employment-related benefits in return for sexual favors;
- derogatory or insensitive jokes, pranks, or comments;
- slurs or epithets;
- nonverbal behavior such as staring, leering, or gestures;
- ridiculing or demeaning comments;
- innuendos or veiled threats;
- displaying or sharing offensive images such as posters, videos, photos, cartoons, screensavers, emails, memes, social media posts, or drawings that are derogatory or sexual;
- offensive comments about appearance, or other personal or physical characteristics, such as comments on someone's physical disability or religious attire; or
- unnecessary or unwanted bodily contact such as preventing normal movement, or physically interfering with the work of another individual.

This list of examples is not exhaustive, and there may be other behaviors that constitute unacceptable harassment under the Policy.

Iveco Group respects and abides by the laws in all countries in which we operate. Covered Persons are required to understand and adhere to the Company's policies. Policies and approved practices may differ based on the country in which the employee is from and/or working. Covered Persons are expected to review and/or seek understanding of the policies as well as any local policies of the specific locations in which they and their employees are from and/or work.

**Responsibilities and mechanism to report harassment:** Covered Persons have an obligation to comply with this Policy. Any employee who believes he/she has been subjected to harassment by a Iveco Group employee or third parties, or who has witnessed harassment of or by another Iveco Group employee, has a responsibility to promptly report the matter to his/her manager or to his/her HR representative or through the Iveco Group Compliance Helpline ([ivecogroupcompliancehelpline.com](http://ivecogroupcompliancehelpline.com)). Iveco Group strictly prohibits any type of retaliation against

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any employee who, in good faith, reports a potential matter (see Anti-Retaliation Policy). Retaliatory treatment of any employee for reporting discrimination, harassment or other prohibited behavior or for cooperating in an investigation is strictly forbidden. Violations of this Policy may result in disciplinary action up to and including (without limitation) termination of employment.

**Additional Information:** This Policy supplements the information contained in our Code of Conduct and our Corporate policies including:

Iveco Group's Human Rights Policy

Iveco Group's Compliance Helpline Policy

Iveco Group's Anti-Retaliation Policy