IVECO • GROUP

Company Iveco Group	ANTI-RETALIATION POLICY	
Function Legal & Compliance	**Effective Date** January 2022	**Pages** 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 Individuals").

Purpose: Iveco Group's Code of Conduct states that all employees who report suspected violations of the law, Code of Conduct, or Company policies or procedures in good faith, or have requested information or clarification regarding the proper interpretation of law, the Code of Conduct or Company policies are protected from any form of retaliation for doing so.

This Policy reinforces the Company's commitment to protect all employees reporting potential issues in good faith. The aim is to ensure a safe reporting environment that encourages employees to speak-up and raise issues and concerns without fear of being retaliated against for doing so.

What is retaliation?

For purposes of this Policy, "retaliation" means an adverse action or threat of adverse action against an employee because such employee in good faith does or is about to do any of the following: makes a complaint; raises a concern, provides information; or otherwise assists in an investigation or proceeding regarding any conduct that he or she reasonably believes to be in violation of Iveco Group's Code of Conduct or policies, or applicable laws, rules or regulations.

Retaliation can take many forms and creates a hostile, threatening or uncomfortable environment negatively affecting employment conditions. Some adverse actions are more overt (e.g. termination, transfer, reduction of job responsibilities, harassing e-mails, or receiving a negative performance evaluation as a result of reporting a concern in good

faith) while others may be more subtle (e.g. exclusion from business meetings and social events or professional opinion no longer being requested as a result of reporting a concern in good faith).

But remember, not all adverse actions are necessarily retaliation. For example, it is not necessarily retaliation if an employee who reports a matter in good faith, but has performed poorly, and receives a negative performance review as a result of that poor performance.

Policy

Iveco Group prohibits and will not tolerate any form of retaliation. Retaliation seriously damages Iveco Group's ethical culture and it is contrary to the Company's core values.

The Company and Covered Individuals will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee in the terms and conditions of his or her employment based upon any lawful action of such employee with respect to:

- good faith reporting of possible violations or violations of applicable law or the Code of Conduct or Company policies
- good faith participation in any investigation, audit or other proceeding related to such reports, or
- objecting to conduct that reasonably appears to be a compliance violation

Iveco Group prohibits retaliation against employees even if their concerns are ultimately found to be unsubstantiated after investigation, unless the employee knowingly made a false allegation, provided false or misleading information in the course of an investigation, or otherwise acted in bad faith.

Mechanism to report retaliation

Employees who believe in good faith they have experienced retaliation, or have questions concerning this Policy, should report the matter immediately using any of the available reporting channels including the Compliance Helpline (ivecogroupcompliancehelpline.com). Any employee who files a report of retaliation may be asked to cooperate in the investigation of such claim.

All Managers/Supervisors or members of Company control functions including Internal Audit, Human Resources and Legal & Compliance who receive a report related to acts of

potential retaliation (or any other kind of violations) must report the details of the complaint received in a timely manner through use of the Manager Report Form (available on the Company's intranet) or the Compliance Helpline.

The Company takes seriously all reports received - including reports of potential violations of this Policy. All reports will be investigated thoroughly in a professional manner and treated as confidential to the extent possible.

Any employee who violates this policy is subject to disciplinary action, up to and including termination, to the extent permitted by local law.

Responsibilities

All Managers/Supervisors are responsible for:

- Maintaining an "open-door policy"
- Educating their staff and encouraging the reporting of potential compliance violations through leading by example in demonstrating a culture that values and addresses employee concerns regarding potential violations of the law and a commitment to preventing retaliation.
- Promptly reporting any act of retaliation taken against an individual for reporting a potential compliance violation

All employees are responsible for:

- Promptly reporting any potential violation of the law, Code of Conduct or Company policies through the reporting channels made available by the Company
- Promptly reporting acts of retaliation they become aware of either against them or taken against another employee

Additional Information:

This Policy reinforces and supplements the information contained in our Code of Conduct and in our Compliance Helpline Policy.