

I V E C O • G R O U P

Company Iveco Group	ANTI-RETALIATION POLICY		
Function Legal & Compliance	Version 2.0	Effective Date May 2023	Pages 4

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

Retaliation seriously damages Iveco Group’s ethical culture, and it is contrary to the Company’s core values.

This Policy reinforces the Company’s commitment to protect whistleblowers supporting them in reporting potential offences or irregularities in a safe way. The aim is to ensure a secure reporting environment that encourages and enables whistleblowers to speak-up and raise issues and concerns without fear of being retaliated against for doing so.

Definitions

For the purpose of this Policy:

What is a whistleblower?

A whistleblower is a person who informs and shares his/her knowledge on any wrongdoing which he/she thinks is happening within the Company.

A whistleblower can be a Company stakeholder, such as an employee, a former employee, a supplier, a consultant, a client, a candidate for employment, etc.

What does good faith mean?

It means that the reporting persons should have reasonable grounds to believe, in light of the circumstances and the information available to them at the time of reporting, that the matters reported by them are true (even if the report results inaccurate or not true).

What is retaliation?

Retaliation is an adverse action or threat against a whistleblower because such whistleblower in good faith does or is about to do any of the following:

make a complaint; raise a concern, provide information; or otherwise assist in an investigation or proceeding regarding any conduct that he or she believes in good faith 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 whistleblowers conditions. Some adverse actions as a result of reporting a concern are more overt, such as, for example:

- employee termination
- reduction in wages
- imposition of any disciplinary measure
- reprimand or other penalty, including a financial penalty
- transfer, reduction of job responsibilities
- harassing e-mails
- negative performance evaluation
- cancellation of a supplier contract for goods or services
- cancellation of a license or permit to a business partner

while others may be more subtle such as for example:

- exclusion from business meetings and social events
- professional opinion no longer being requested
- withholding of promotion
- withholding of training
- change in working hours
- a negative employment reference
- coercion, intimidation, ostracism, discrimination, disadvantageous or unfair treatment
- financial loss, including loss of business and loss of income
- blacklisting based on a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry

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But remember, not all adverse actions are necessarily retaliation. Nothing in this Policy should be interpreted as preventing Iveco Group from taking business decisions based on legitimate reasons. For example, it is not retaliation a negative performance feedback given to an employee as a result of his/her poor performance or a partnership termination with a business partner as consequence of a relevant contractual breach, even in case they reported a matter in good faith.

Policy

Iveco Group prohibits and will not tolerate any form of retaliation.

The Company also prohibits retaliation against whistleblowers even if their concerns are ultimately found to be unsubstantiated after investigation.

Mechanism to report retaliation

Whistleblowers who believe 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 whistleblower 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 the use of the Manager Report Form or the Compliance Helpline (both available on the Company's intranet).

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.

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

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addresses whistleblowers concerns regarding potential violations of the law and a commitment to preventing retaliation.

- Promptly reporting any act of retaliation taken against a whistleblower 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 any other whistleblower

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

Additional Information:

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