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Company Iveco Group	ARTIFICIAL INTELLIGENCE USE - COMPANY POLICY		
Function Legal, Compliance and Corporate Governance	<b>Version</b>	Effective Date	Pages
	1.0	March 2024	4

The adoption and/or use of Artificial Intelligence (as defined below) comes with risks to our Company.

These may include: 1) performance risks, e.g., errors and biases; 2) security risks, e.g., false, deceptive, misleading, "deepfakes" data and information; 3) business and reputational risks and misalignment with our Values and Behaviors; and 4) loss of control of valuable data (e.g., intellectual property), inability to detect unintended outcomes, loss of privacy data.

This Policy contains the key principles that frame and guide the use of Artificial Intelligence at work.

<u>Scope:</u> This Policy applies to Iveco Group N.V. and its subsidiaries (collectively, "Iveco Group", "IVG" or the "Company") and the directors, officers and employees of such entities as well as those acting for or on behalf of such entities who adopt and/or use Artificial Intelligence.

<u>Purpose:</u> The purpose of this Policy is to provide a guide for the appropriate use and governance of Artificial Intelligence (AI) within Iveco Group, including machine learning, generative AI, natural language processing, and computer vision. The use of AI technologies should take into account the need to protect intellectual property and ensure compliance with data privacy and all applicable laws, ethical practices and high standards, in line with the Company's Code of Conduct.

## **Definitions:**

**Artificial Intelligence** (**AI**) includes technologies like generative AI, machine learning (algorithm-based predictions or decisions), natural language processing (computer understanding of human language) and computer vision (computers interpreting visual information). All can range from simple rule-based systems to advanced autonomous systems.



## Policy means this policy.

Al Tool means any application, software, system, process incorporating or making use of Al.

## Al Acceptable Usage - Principles:

#### Responsible Al Use

Our commitment to responsible AI use extends beyond compliance with laws and regulations. We strive to prevent any harm for the Company and the people, privacy violations, or malicious use of AI. This involves rigorous testing, ethical considerations, and continuous monitoring to ensure that the use of AI is safe, secure, and intended for beneficial purposes. Any person at Iveco Group shall collaborate to ensure responsible use of AI and AI Tools for work purposes, whether on Company or private devices.

## Transparency and Accountability

We recognize the importance of transparency and accountability in AI decision-making processes. To this end, we will maintain clear documentation and communication regarding the role of AI in critical decisions. Responsibility for outcomes generated by AI shall be clearly defined, to the extent they can be detected and/or anticipated, to maintain trust and integrity in our operations with any and all our stakeholders.

#### **Bias Mitigation and Fairness**

We acknowledge the potential for bias in AI when it comes to applying the same to our business purposes and activities and commit to actively identifying and mitigating these biases. Our goal is to develop and use AI that are inclusive and fair, providing equal opportunities and outcomes for all users, irrespective of their background. Any Iveco Group employee and collaborator shall collaborate in these efforts.

#### **Human-Al Collaboration**

Our approach to AI emphasizes its role as a tool to augment, and not to replace, human expertise and decision-making. We will focus on leveraging AI to enhance human capabilities, ensuring that our employees understand the limitations and strengths of AI technologies. Employees shall devote an appropriate amount of time, as the Company will request, to training in order to develop the level of proficiency required to understand and properly manage AI Tools and contribute to minimizing negative effects of their use for work purposes.

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## **Central Role of the IT Department**

The Company promotes and utilizes a cross-functional risk-based approach to identifying, assessing, addressing, documenting, and managing AI risks and potential negative impacts.

The IT department is designated as the central coordinating body for Al-driven or Al-focused projects, ensuring technological alignment with business strategies and policy compliance. IT department shall also play a leading role in identifying proper training and awareness initiatives (in collaboration with HR and with advice on relevant implications from Legal & Compliance Department) for Iveco Group employees, consultants and collaborators involved or in any way impacted by Al or Al Tools.

## **Detailed Policy for Al Use**

Al must be used in accordance with high ethical standards, data protection and other applicable laws, and ensuring responsible management of sensitive and confidential data.

This Policy ensures that AI is employed to drive innovation within ethical and legal boundaries.

## Alignment with the Company's Code of Conduct

Al initiatives must be in line and strictly adhere to the Company's Code of Conduct and our Policies, reflecting a commitment to ethical business practices, corporate responsibility, and social accountability.

In particular, use of Al and creation, dissemination and application of any Al Tool should align with ethical standards, fairness, and avoids biases or discrimination. We are all committed to prevent Al is used to engage in illegal activities, harass individuals, or infringe upon others' rights in and outside Iveco Group.

#### Intellectual Property Management and Respect for Third-Party Rights

Intellectual property management is a critical component of all AI-related endeavors, ensuring proper prevention of infringements upon third-party intellectual property rights, as well as protection of our Company's intellectual property and rights related to AI use and/or AI Tools.

#### **Data Protection and Privacy**

We are committed to ensure Al use meets the highest personal data protection standards. Al Tools shall always be managed in compliance with any applicable laws, regulations and best practices for data management and security.

#### Third-Party Al Management

Third-party AI, including cloud-based services and analytics tools, will undergo rigorous vetting for security, privacy and compliance with intellectual property, in accordance with our internal policies and procedures and we will

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always ensure that agreements with AI providers include adequate provisions on personal data protection, security, intellectual property protection, along with provisions to allow for effective auditing.

When engaging with third-party AI service providers, we will ensure they adhere to our contractual terms, ethical standards and applicable legal requirements. Regular assessments will be conducted to evaluate their compliance with our AI policies.

## **Training and Education**

Employees shall receive appropriate training on how to use AI responsibly and effectively. They should also stay informed about progresses in AI technology and potential ethical concerns that may impact on the Company and our business and lives. IT department shall be the owner of these awareness and training initiatives, to be construed and deployed in collaboration with other departments such as HR, Legal & Compliance and IA/ERM.

## **Compliance**

We strive for responsible adherence to this Policy: as a consequence, any misconduct (by way of breaches of data security or misuse of Al Tools, without limitation) will be investigated and properly disciplined in accordance with Company's policies and procedures; if misconduct will be factually established appropriate actions will be taken, up to termination of employment and including legal action if necessary.

We will conduct regular audits internally and with our partners and suppliers to ensure compliance with this Policy.

#### **Additional Information**

This Policy supplements the information contained in our Code of Conduct and ranks in all respect as all our other Company policies, including ICT policies. In case of conflicting provisions in respect of other Company's guidelines, this Policy shall prevail.