

<p style="text-align: center;"><b>Company</b></p> <p style="text-align: center;">I V E C O • G R O U P</p>	<p><b>COMMUNICATIONS POLICY</b></p>	
<p style="text-align: center;"><b>Function</b></p> <p style="text-align: center;">Communications</p>	<p style="text-align: center;"><b>Effective Date</b></p> <p style="text-align: center;">1<sup>st</sup> March 2022</p>	<p style="text-align: center;"><b>Pages</b></p> <p style="text-align: center;">11</p>

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### 1. GENERAL PRINCIPLES

As a publicly traded company on the Euronext Milan stock exchange (MI: IVG), Iveco Group N.V. (the "Company") must always be prudent when communicating information externally. Moreover, Iveco Group's reputation is one of the Company's key assets which contributes to its business success. For these reasons, the following principles apply:

- a) The release of information to external audiences must be managed in such a way to: (i) comply with legal requirements and (ii) avoid disclosure of Inside Information (as defined in section 4 below) that could impact the Company's competitive positioning or lead to legal liability for Iveco Group or its employees and officers.
- b) Communicating to external audiences in a coordinated manner is critical to Iveco Group's business success, and therefore, must only be undertaken by designated authorized "spokespeople" within the Company (i.e., Communications, Investor Relations, and Iveco Group Executives).
- c) Communication must be consistent across the Company and its functions worldwide and aligned with Company policies and data/information that have been officially released through Iveco Group's major communication channels (press releases, Iveco Group website, legal filings, etc.; see also section 5 below). With the goal of presenting a unified Company image, it is imperative that Iveco Group avoid issuing communications that are inconsistent or that present contradictory representations of the Company and its position.

For the regulation of issues concerning (i) the internal management and external communication of Inside Information (as defined under paragraph 3.1 of this Policy) and (ii) the management of the list of persons who have or may have access to Inside Information ("**Insider List**"), please refer to the Procedure for management of Inside Information ("**Inside Information Procedure**").

### 2. SCOPE

This policy applies to all Iveco Group directors, officers and employees worldwide as well to those working for or on behalf of Iveco Group.

### 3. COMMUNICATION RULES

As a general rule, Iveco Group employees should not disclose any Inside Information (as defined in paragraph 4.1. of this Policy) or communicate externally about or on behalf of the Company. When communication is necessary, employees should seek prior approval from

Communications or Investor Relations. With particular regard to the disclosure and external communication of Inside Information, the Inside Information Procedure will apply.

### **3.1 Communication with the Media**

All media requests must be directed immediately to Communications, or to those responsible for communications within each brand, business or country. These may include formal requests for interviews, as well as inquiries, and relate to all media, including television, radio, newspapers, magazines, local/national and trade media and internet sites. It is the duty of Communications, or those responsible for communications for a specific brand, business or country, to respond to the request on behalf of Iveco Group, or to otherwise assist in identifying the appropriate person from the Company to handle the response.

#### **3.1.1 Press Releases**

Should a Company message be communicated by means of a press release to the general public, Communications should always be involved prior to its distribution for support and guidance in the related process. Firstly, Communications should involve Finance and Legal & Compliance Functions to evaluate whether or not the press release involves the dissemination of “sensitive information” (see section 4 below). Important to such evaluation is whether, on the basis of the circumstances known, the dissemination of the information would be likely to have a material impact on the price of the Company’s shares or other financial instruments (for example, public debt).

If the press release is determined not to include dissemination of Inside Information, the following steps are to be followed:

- 1) The release is to be drafted by the applicable functional area using the standard template;
- 2) Issuance of the release is to be approved by Iveco Group Communications and, to the extent appropriate, by Legal & Compliance and Investor Relations, with the involvement of other functions as appropriate. Considering the substance of the proposed press release, consider whether senior management (or the CEO and Chair) should be informed and/or consent to the issuance of the proposed release;
- 3) If a press release mentions or is a joint press release with a third party, preliminary internal review and approval shall occur prior to external/third party review.

The process of draft, approval and dissemination of a press release which contains Inside Information is governed by the Inside Information Procedure, to which you are referred.

### **3.2 Company Spokespeople**

Without prejudice to the provisions of the Inside Information Procedure in the occasion of external communication of inside information, all Company communications with external audiences is organized as follows:

- a) Communication with the media is solely managed by Iveco Group Communications staff (generalist media) and Brand Communications staff (trade media). No employee is authorized or permitted to communicate with the media without the approval of Iveco Group Communications, Brand Communications, or Regional communicators with responsibilities for communicating externally.
- b) Iveco Group Communications or Brand/Business/Country Communications representatives may at times ask persons other than those with communications responsibilities to serve as company spokespeople. The communication professionals will provide them with the necessary preparation and materials, and may also attend the subsequent interviews. Designated spokespeople should not comment on matters other than those agreed upon with Company communication professionals.
- c) If Iveco Group executives are requested to speak on behalf of the Company, they will be supported by either Group Communications, Brand/Business/Country communication representatives or Investor Relations professionals, who will provide the necessary preparation and materials, as well as coordinate and or attend any subsequent interviews or meetings.
- d) Brand and Business Unit Presidents and their designated spokespeople are authorized to comment on their Brand's or Business Units activities, but should refrain from commenting on Iveco Group as a whole, unless otherwise directed.
- e) Communication with financial analysts and the investor community is managed by the Investor Relations department. Investor Relations is responsible for Iveco Group's communication with financial analysts, investment banks, investors and similar groups. Other than the Chair, CEO, Chief Financial Officer and Investor Relations management, no Iveco Group employee may speak to the investment community on behalf of Iveco Group without prior approval by Investor Relations. Employees should direct to Investor Relations all requests to present to the investment community.

## **4. SENSITIVE INFORMATION**

### **4.1 Inside Information**

As indicated in the Inside Information Procedure, the term "Inside Information" refers to information of a precise nature which has not been made public, relating, directly or indirectly, to the Company or to its financial instruments and which, if it were made public, would be likely to have a significant effect on the prices of those financial instruments. Information are material ("*would be likely to have a significant effect on the prices of those*

*financial instruments*”) if a reasonable investor would be likely to use it as part of the basis of his or her investment decisions.

The term “Inside Information” used in this Policy has the same meaning as the term “Material Non-Public Information” used in the Insider Trading Policy.

By way of example, it is likely that the following information, whether relating to actual occurrences or to plans or risks relating thereto, in most circumstances would be deemed “material”:

- earnings reports, estimates or projections;
- an actual change in earnings or in forecasted earnings that is higher or lower than the forecast;
- commercial strategies or major changes in marketing strategies;
- award of a significant supply contract;
- capital expenditure projections;
- decrease or increase in dividend rate;
- significant acquisition or disposition of assets or businesses;
- formation of a joint venture or merger;
- significant labour problems;
- discovery of a new invention or development of a new product;
- proposal to offer or the issuance of additional securities;
- incurrence of significant new indebtedness;
- changes to the Board of Directors;
- significant changes in management;
- proposed tender offer for another company's securities;
- significant litigation or government investigations;
- future company strategies.

The above indications are provided here for ease of reference, and without limitation they don't substitute or supersede regulation provided in the Inside Information Procedure. For further clarifications and details about the management and disclosure of Inside Information please refer to the Inside Information Procedure.

## **4.2 Other Sensitive Information**

Certain information shared widely within the Company cannot be shared outside the Company, as it would impact the Company's competitive positioning. Such information includes without limitation:

- production volumes or production costs;
- forecasts of future production, or future revenues, future market share growth, or any numbers or amounts concerning the future that are not included in the most recent quarterly results press release and analysts' conference call slides;
- information regarding planned future investments;
- information about the Company's future product strategy and future product launches;
- past, present or future margins on products;
- differentiation levels between products of a similar platform;
- percentages of Iveco Group growth or decline when talking about industry trends.

### **4.2.1 Communicating commercially sensitive information**

In most countries, there are severe legal restrictions or prohibitions with respect to information sharing among market operators competing in the same product and/ or geographic market, especially in relation to certain types of data (such as, without limitation, commercial strategies, sales volumes, market shares, production plans, discounts or rebates etc.) when these data that are recent – i.e. less than 12 months old. In some cases, industry associations and trade groups, as well as certain third parties collect sales data or other commercially sensitive information from various participants or members thereof and from market operators, consolidate the data and provide participants or clients with their particular market share data (but not with respect to other market participants). In these situations, particular care should be put in liaising with these subjects since also said practices can be sensitive from a legal perspective. Please refer to the Legal Department for further advice in case of doubts.

The assessment as to whether publishing or exchanging commercially sensitive data may create a risk from a competition law perspective depends also on various specific facts, including market power of the subjects involved, scope and contractual context - if any - of the exchange, granularity of the data and whether the data published or exchanged are or may be deemed to be already in the public domain. In any case competitive sensitive information should be shared inside and outside the company in such a way as to always ensure clear context and reasoning, evidence of sources, aggregation of the data and a cautious approach. It should also be remembered that competition law authorities have the power to investigate at all times not only company premises, but also company cars, electronic devices and under certain conditions also private houses to detect and retrieve information in relation to anticompetitive allegations or behaviours. The reputational risk, on top of financial risks for the Company of these investigations,

are very relevant: every employee and officer of the company should collaborate to prevent this risk exposure. Use of socials, private mails and other tools may also be in scope for these investigations. For any questions or for the analysis of specific situation, please consult with Communications and Legal & Compliance Functions representatives.

#### **4.2.2. Information on Competitors**

Iveco Group does not comment on its competitors' data (market share, production, etc.). This includes written or spoken communication.

It is strictly prohibited to make negative comments, or to speculate about a competitor's strategy, results or future plans.

### **4.3 Financial Information**

Iveco Group presents financial information four times a year through its quarterly earnings reports and communicates financial data for the entire Company. Employees should never break down or otherwise provide financial data by any other than the segments already established in the Iveco Group official publications and materials. The Company has established a specific process pursuant to which quarterly earnings reports will be prepared and distributed outside of the Company. For questions, please contact Investor Relations or Communications.

### **4.4 Updating Information**

Information included in a press release is considered valid as of the date of its release. Only the competent Communications Function is entitled to put in place actions intended to amend/ modify information.

Employees should never update the information in the press release or confirm its validity; such data should always be quoted as valid as of the date of the release.

Requests for updates should be referred to Iveco Group Communications.

### **4.5 Selective Disclosure and Omission of Material Facts**

#### **4.5.1 Selective Disclosure**

Selective disclosure is the release of certain non-public information only to a select group or individual.

Without prejudice to the provisions (i) of the Inside Information Procedure with regard to the dissemination of Inside Information and (ii) of the Insider Trading Policy regarding the prohibited conducts under the market abuse regulations (e.g. "insider trading", "insider

tipping”, “insider tayautage”), management, or other members of the Company who interact with external audiences, may not disclose to selective audiences Inside Information without simultaneously disseminating the same Information to the public at large, in the manner and within the terms established by the abovementioned Procedure.

Disclosure only to a particular individual or group, allowing that person or group to make investment decisions on the basis of information superior in quantity or quality to that generally available to the public, would qualify as “tipping” and would violate insider trading procedure and applicable laws and regulations. Evidence of favoured treatment given to a particular person or group may be drawn not only from the timing of the disclosure, but also from the frequency of granting interviews.

#### **4.5.2      *Avoiding Selective Disclosure***

In order to avoid selective disclosures, press releases and presentations to analysts will be scripted by the Company’s officials and reviewed by the Company’s lawyers prior to releases and conferences and the process and scope of distribution will be approved by Iveco Group Communications, Investor Relations and Legal & Compliance.

The responsibility for such presentations will be placed upon a limited number of officials within the Company.

Any anticipated sensitive issue shall be banned from discussion by stating at the beginning of the presentation that the corporate official is not at liberty to discuss it. A “no comment” position is permissible.

Less formal communications with the analysts will be conducted according to procedures established by the Communications and Investor Relations functions, which will be intended to reduce the likelihood of inadvertent or inaccurate disclosures.

#### **4.5.3      *Misleading Material Statements – Omission of Material Facts***

Misleading Material Statements and Omission of a Material Fact may result in a violation of civil, administrative and criminal provisions under applicable laws and regulations, with consequent imposition of sanctions against both the single person operating on behalf of the Company and the Company itself.

Therefore, all communications must be carefully drafted and reviewed to avoid the omission of a material fact. All communications must be accurate, complete, and balanced in their presentation of applicable information.

#### **4.5.4      *Subsequent Measures***

If, notwithstanding precautions, an unintentional disclosure of material and non-public information has occurred, the Company policy shall be as follows:



- the party making the unintentional disclosure shall notify Investor Relations, Communications and Legal & Compliance immediately and provide relevant details;
- a press release concerning the selectively disclosed information will be promptly prepared and disseminated pursuant to the Inside Information Procedure; that is, within twenty-four (24) hours or before the commencement of the next day's trading on Euronext Milan;
- the selective audience will be immediately requested to refrain from using the information and to keep it confidential and registered in the Insider List according to the Inside Information Procedure.

## **5. SOURCES OF OFFICIAL IVECO GROUP DATA**

In general, material and other non-public information will be considered to be publicly available when it is widely known to the investing public and the public has had a chance to absorb the information and act upon it.

Iveco Group officially releases data to the public through a variety of means:

- Iveco Group Publications and Presentations
- Iveco Group Press Releases
- Iveco Group Website [www.ivecogroup.com](http://www.ivecogroup.com)
- Iveco Group Videos

Those who refer to information publicly released by the Company must make sure that the messages communicated are strictly aligned with the official source in order to avoid any distortion in its transmission.

## **6. INSIDER TRADING**

The following information is provided here for ease of reference, but it doesn't substitute or supersede the information provided in the aforementioned Insider Trading Policy.

The Italian securities laws (and the laws of other relevant countries) sanctions individuals who have access to Inside Information that engage in specific conducts, such as insider trading", "insider tipping" and "insider tuyautage". These conducts can result in a governmental investigation of the individual as well as the Company and can result in material fines and even imprisonment of convicted individuals.

For specific details and explanations about the conducts above, please refer to the already mentioned Insider Trading Policy.

## **6.1 Blackout Periods**

A “regular blackout period” is the period commencing 30 (thirty) days immediately prior to the date of the announcement of quarterly earnings reports or the year-end results and ending 2 (two) business days after the earnings release date for the quarter. During such regular blackout periods, “insiders” (i.e., directors, officers, employees, family members, etc.) are prohibited from trading in Iveco Group securities. In the event of a material transaction or event, the Company may implement a “special blackout period”, notice and the details of which would be distributed by Communications. For further details please refer to the Insider Trading Policy.

## **6.2 Quiet Periods**

At the end of each quarter, the Company will observe a “quiet period” with respect to communication with the investment community commencing at the close of the quarter. During this quiet period, the Company, including any employees of the Company, will refrain from providing any information and guidance on matters potentially impacting earnings outlooks. Similar quiet periods may apply prior to the issuance of public debt or the sale of securities by the Company.

## **7. USE OF THE IVECO GROUP LOGO**

Permission to use the Iveco Group and/or brand logos by external parties must be approved by Iveco Group Communications, assisted by Legal & Compliance’s Intellectual Property department. Permission to use trademark rights will not be given to third parties without evaluating the possible consequences of permitted use by others and the effect such use may have on the ownership, enforceability, and maintenance of the Company’s registered trademark rights.

External parties who are granted usage of one of Iveco Group’s trademarks may be required to sign a limited license agreement, dependent upon an evaluation undertaken by Iveco Group’s Communications, assisted by Legal & Compliance.

Iveco Group does not generally grant permission to use its trademark to companies, of which the Company is a client, whose intentions are to use the trademark as an advertisement for their commercial gain.

Iveco Group may grant permission for one-time requests or limited quantities for non-profit or educational uses.

## **8. INTERNET COMMUNICATION**

Without prejudice to the provisions of the Inside Information Procedure with regard to the dissemination of information that may be qualified as “Inside Information”, employees are prohibited from publishing information on behalf of Iveco Group or from disclosing

information regarding any aspect of the Company's business on the Internet (as well as on any other media or channel), unless otherwise authorized. Publication on the Internet includes, but is not limited to, social media sites (e.g., Facebook, Twitter, LinkedIn, Instagram), chat rooms, bulletin boards, blogs and wikis. Communications within the organization, for example by means of WhatsApp messages, texts, emails, sharing services or internal social networking services, must remain internal to the Company and may not be shared externally.

Information about Iveco Group posted on the Internet by employees or other parties is not to be considered information made publicly available by the Company or otherwise attributable to the Company.

Employee disclosure of Inside Information about Iveco Group through the Internet could result in prosecution and dismissal for the individual and force the Company to issue a press release in compliance with the provisions set forth under the Inside Information Procedure.

Use of social media "on behalf" of Iveco Group is allowed only to and by the Group's Communications representatives, who must do it in full compliance with this Communications Policy.

## **9. VIOLATION OF THE POLICY**

Violation of this Policy (even if unintentional) can have material adverse consequences on the Company as well as the individual(s) involved. Accordingly, violations of this Policy may result in discipline up to and including termination of employment. In addition, violations of this Policy may also constitute violations of applicable law which could result in civil or criminal prosecution by governmental authorities.