

I V E C O • G R O U P

Company Iveco Group	GIFTS, ENTERTAINMENT & TRAVEL COMPLIANCE POLICY	
Function Legal & Compliance	Effective Date January 2022	Pages 9

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. For avoidance of doubt, this Policy applies to Iveco Group and its business relations with, among others, sales representatives, consultants, distributors, joint ventures, and joint venture partners (collectively, “Covered Persons”).

Purpose: This Policy provides principles and criteria Covered Persons must consider when accepting/providing gifts, entertainment or travel from/to third parties in order to avoid even the appearance of making business decisions in exchange for personal gain or improperly influencing the judgment of third parties in doing business. The principles in this Policy apply with respect to both government and private sector third parties.

Definitions – for purposes of this Policy:

“**Cash or cash equivalents**” shall mean money or items that are easily converted to cash including, but not limited to, bank checks and drafts, travelers’ checks, treasury bills, short term government bonds, gifts cards, and fuel vouchers.

“**Criteria**” shall mean those criteria listed herein which must be satisfied as a prerequisite for any Gift or Entertainment to be considered permitted under this Policy.

“**Entertainment**” shall mean meals, drinks, special events, attendance at social, cultural or sporting events with third parties (or tickets, passes or something similar to attend any such events) in order to facilitate the creation or continuance of a business relationship with the Company.

“**Gift**” shall mean anything of value. This does not include charitable contributions or sponsorships properly approved by the Company (e.g. pursuant to the Iveco Group Community Investment Policy).

I V E C O • G R O U P

“Government Official” shall mean any officer or employee of any public international organization (e.g., the United Nations, the World Trade Organization) or a government or any government department, agency, or instrumentality (which includes a state-owned commercial enterprise) or any person acting in an official capacity for, or on behalf of, any such government or department, agency, or instrumentality, including a government's consultants or any entities subject to government procurement regulations. “Government Official” also includes a political party, party official or candidate for office.

“Third Parties” shall mean any persons or entities, including both Government Officials as well as private individuals, that are not a Iveco Group employee or legal entity.

“Travel” shall mean transportation by any means and overnight accommodations.

Criteria:

1. Intent. No Gift or Entertainment may be offered or accepted in exchange for or as a reward for any action or inaction (past, present or future) and may not be intended to improperly influence the judgment or decision making of the receiver; and
2. Legality. The Gift or Entertainment is permitted under local laws and by the recipient’s employer’s policy (Government Officials and employees of government instrumentalities may be subject to stricter Gift policies); and
3. Materiality. It is not lavish, but rather, is of reasonable value consistent with modest local standards or has been pre-approved in writing in accordance with the Approval matrix below (please note specific lower thresholds apply in certain countries. Please see Annex “A”) Holiday gift baskets or flowers or promotional items bearing a brand logo such as calendars, hats, t-shirts, coffee mugs are typically acceptable; and
4. Approval. The table below sets the threshold and pre-approval requirements (must be in writing) for Gifts and Entertainment:

Threshold € Euro (or local equivalent)	Approval Required?	Pre-Approver	
		Requestor's supervisor	Country Legal Counsel
Any amount in connection with a	Yes	X	X

I V E C O • G R O U P

Government Official			
≤ 50(*) Non-Government Official	No		
50 ≤ 100(*) Non-Government Official	Yes	X	
>100 Non-Government Official	Yes	X	X

(*) Specific lower threshold values apply in certain countries. Please see annex “A” for such countries.

5. Frequency. Gifts and Entertainment may only be given or accepted occasionally and not repeatedly; and
6. Transparency. Gifts and Entertainment must be presented or accepted with complete transparency in the name of the Company and not on behalf of any particular individual employee and must be accurately and properly documented including accurate details about the Gift or Entertainment, to be provided to the Company, and/or to regulators and the public if required; and
7. Appropriateness. It is appropriate and does not reflect negatively on the reputation of the Company. Entertainment of a sexual nature and gambling are prohibited forms of Gifts and Entertainment and are not allowed. Cash or cash equivalents (including “per diems” are never permitted in connection with any Entertainment nor as Gifts).

Policy:

- A. Giving Gifts: A Gift may be given to a Third Party if such Gift meets **all** the above Criteria and:

Gifts to fellow team members. Gifts from managers to his/her team members for occasions such as completion of a large project, retirement, work anniversaries, or administrative professionals’ day are allowed if given through the Company’s Reward and Recognition System. Gifts from one employee to another are allowable if paid for by the employee and not expensed to the Company. If you collect funds for a group Gift, be sure participation is strictly voluntary. Gifts given to employees at Company expense as part of Company-sponsored initiatives, contests or team-building exercises are allowed as long as they are reasonable in value and

I V E C O • G R O U P

approved by the applicable member of management through the applicable business expense approval process.

Commemorative gifts. Gift limits do not apply to certain commemorative gifts provided by the Company to third parties or received by the Company from third parties in recognition of certain milestones such as major contract signings or safety and service awards; however, such commemorative gifts must follow applicable approval processes.

- B. **Receiving Gifts:** Covered Persons should never solicit Gifts from Third Parties. A Gift may be accepted from a Third Party if such Gift meets **all** the above Criteria and:

Gift Baskets. Employees accepting a Gift basket from a Third Party are required to accept the Gift on behalf of the Company as a whole and not as a personal or individual Gift. All such Gift baskets must be shared with Company employees at that location (e.g. set out in a Company break or coffee room for all employees to share).

Refusing a Gift. If an employee has reason to believe or is concerned they are being offered a Gift that does not meet the Criteria, they should politely refuse the Gift. There are countries where refusing a Gift could be considered improper or impolite. In those situations, the employee may accept the Gift but must also, as soon as is practicable, contact his/her legal/compliance representative for advice. Any Gift accepted by an employee which does not meet the Criteria set forth above, shall become Company property. The employee must turn the Gift over to the Company to be handled appropriately (e.g. donated to charity).

- C. **Providing Entertainment to Third Parties:** Providing Entertainment to Third Parties is an acceptable business practice so long as it meets all the above Criteria and:

If Entertainment is to be provided to Government Officials, prior written approval from local legal counsel is always required. Pre-approvals must be given in writing.

- D. **Accepting Entertainment from Third Parties:** Covered Persons should never solicit Entertainment from a Third Party. Entertainment received from Third Parties may be an acceptable business practice so long as the Entertainment meets all the above Criteria and:

Entertainment must always be offered voluntarily and intended to provide an opportunity to discuss business matters, build business relationships and should not in any way be perceived as improperly influencing the judgment of the Company employee. A representative of the hosting

I V E C O • G R O U P

company must be present at the event. Entertainment activities are considered Gifts when the party offering the Entertainment does not attend the event.

For **meals**, the standard of the meal should be commensurate with the standard of meals permitted for Company employees on a Company business trip. Business meals should not be accepted more than one time per month from the Third Party, unless there are extenuating circumstances.

Sport events, shows and other social/cultural/entertainment activities should not be accepted more than twice in a twelve-month period as guest of the same Third Party;

If the employee has reason to believe or is concerned the Entertainment being offered is not in alignment with the requirements of this Policy, he/she should politely refuse the offer of Entertainment.

E. Providing Travel to Third Parties: Travel expenses may take various forms, including direct payment by the Company, reimbursement of expenses (actually incurred) to a Third Party who sustained such cost on behalf of the Company (e.g. a dealer, a distributor) for the benefit of a Third Party, or as direct reimbursement of expenses to the Third Party. In all cases, Travel provided to Third Parties may be an acceptable business practice so long as it meets **all** the above Criteria and:

There must be a valid business purpose for the Travel. The Company will not pay for any non-business-related travel or related events undertaken by a Third Party (e.g. sightseeing, museums, amusement parks, tours, movies, shows or other entertainment).

The standard of the Travel and accommodations should be commensurate with the standard of Travel and accommodations permitted for Company employees on a Company business trip in accordance with the Company Travel Policy. The length and the timing of the trip must be commensurate with the business purpose. The itinerary must not include more than one non-business day (other than for travel) in each work week. The reimbursement of Travel expenses must be pre-approved by the traveler's employer.

Providing Travel to Dealers as Part of Sales Incentive Programs - Travel provided by the Company to dealers in recognition of the

I V E C O • G R O U P

achievement of certain performance targets is allowable but must be appropriately documented and must follow the applicable approval processes.

Travel Visas –Third parties often require an invitation from a host country sponsor in order to obtain a visa to visit a foreign country. Request for a visa invitation letter must be approved by the director of the Company department sponsoring the visit. The visa invitation letter must include the purpose of the trip, proposed visit dates, duration of the stay and whether the Company will be paying for the trip.

F. Receiving Travel from Third Parties: Travel and related expenses (e.g. overnight accommodations) paid by a Third Party are not allowed. Exceptions are permitted for business travel in an aircraft owned by a Third Party with prior written approval of an immediate supervisor and the applicable Human Resources representative. If a Third Party pays for accommodations or provides “in-house” accommodations, Covered Persons should determine the fair market value, make appropriate payment to the Third Party and arrange for reimbursement through the Company’s expense reporting mechanism.

G. Accurate books and records: All expenditures for Gifts, Travel and Entertainment must be identified separately, accurately and completely on all expense reports and submitted to the requestor's supervisor for review and approval before payment or reimbursement will be considered and paid. The detail of expenditures for Gifts, Travel and Entertainment expenses must include the names of all Third Parties and for Entertainment also the name of each participating Company employee.

For all expenditures made to or on behalf of Third Parties, the Legal Entities on whose behalf the expenditure is made is responsible for verifying the appropriateness of the expenditure, as well as maintaining adequate and accurate records to document the factual basis for the request and written evidence of required approvals.

Each department should maintain appropriate records of Gifts given and the recipients of each Gift.

H. Reporting Violations: any employee or other Covered Person to whom this Policy may apply, who has knowledge of information which he or she reasonably believes may violate this Policy, should report the matter promptly to the Legal & Compliance Manager or through the Company Compliance Helpline.

I V E C O • G R O U P

Additional Iveco Group policies and procedures addressing matters covered under this Policy include, without limitation:

- Iveco Group Code of Conduct
- Iveco Group Investment Policy
- Iveco Group Anti-Corruption Policy
- Iveco Group Conflict of Interest Policy

I V E C O • G R O U P

ANNEX “A” THIRD PARTY – GIFTS AND ENTERTAINMENT COUNTRY THRESHOLDS

IMPORTANT NOTE: Given that Iveco Group operates globally, please note that allowable Gift and Entertainment valuation thresholds provided below are based on the currently available country standards and currency valuations. These values are provided for reference only as they are likely to change over time - local laws, standards and customs shall always prevail. Please also remember the value of a specific Gift is not the only consideration. Even Gifts of very small amounts (lower than the stated threshold) may be inappropriate in some circumstances. It is always best to seek guidance from your Legal & Compliance Department representative prior to the giving of any Gift or Entertainment to any Third Party.

Country	Gift	Local meals and Entertainment
Africa (All countries)	30 Euro	30 Euro
Belgium	gifts should not exceed, on a cumulative basis per year and per recipient 50 Euro	Meals in the amount of 40 Euro would usually be considered as acceptable, with a cumulative calendar year limit of 125 Euro
Brazil	R\$ 120 (approx. 20 Euro)	
China	RMB 100 (approx. 14-Euro)	
Croatia	67 Euro	
Germany	25 Euro	25 Euro
India	INR 500 (approx. 6 Euro)	INR 500 (approx. 6 Euro)

I V E C O • G R O U P

Korea	KRW 50,000 (approx. 37 Euro) KRW 100,000 (approx. 75 Euro) if the gift relates to agricultural and fishery goods and processed agricultural and fishery goods.	KRW 30,000 (approx. 22 Euro) per meal
Lithuania	Euro 29	
Russia	RUB 3,000 (approx. 36 Euro)	
Spain	The Criminal Code does not establish quantitative nor qualitative limitations on hospitality expenses but in Spain it should be prohibited to offer, grant, promise or deliver, directly or indirectly, gifts, benefits or advantages of any nature (whether financial or not) to government officials in consideration of their position or function, regardless of the amount or value of the gift.	Invitations to public events such as a new facilities inauguration, anniversary or an award could be done. In those case, the invitations should be recorded in a register under the compliance officer in which the following information should be recorded: • Name of the government official. • Value and nature of the benefit granted. • Place and date. • Reason why the benefit has been granted. • Person who has granted the benefit. Cash and cash equivalent in never allowed.
Thailand		THB 3,000 (approx. -80 Euro) per occasion and per person.
Turkey	Any present or donation with a value exceeding ten (10) times the net minimum wage amount in Turkey as of the date of granting thereof (approx. 44 Euro) is prohibited.	