

I V E C O • G R O U P

Company Iveco Group N.V.	RESPONSIBLE LOBBYING POLICY	
Function Public Affairs and Sustainability	Effective Date February 2025	Pages 3

SCOPE

This Policy applies to Iveco Group N.V. and its subsidiaries (collectively, “Iveco Group” or the “Company” or “We”) and the directors, officers, and employees of such entities as well as those acting for or on behalf of such entities.

PURPOSE

The purpose of this document is to set out main principles, standards and rules to be followed in order to ensure that our Public Affairs activities are being performed in full compliance with the applicable laws and in line with the Iveco Group Code of Conduct.

The Policy also defines key roles and responsibilities for its effective implementation.

This document takes into consideration OECD *“Recommendation of the Council on Transparency and Integrity in Lobbying and Influence”*.

POLICY

Iveco Group promotes and supports active dialogue and cooperation with international, national, and local authorities, institutions, and stakeholders, including through memberships in different associations.

Iveco Group is committed to contributing to the constructive development of policies, regulations, and standards for its industry, transparently participating in the institutional and public debate around main issues of interest.

Guiding Principles

All interactions with public authorities are guided by transparency, integrity, and neutrality, ensuring that exchanges remain unbiased and sincere.

Interest representation is conducted only when permitted and in strict compliance with applicable laws, including anti-corruption and antitrust regulations, and in adherence to Iveco Group Code of Conduct and related policies and procedures.

To this end, the following measures apply:

Authorised representation and compliance

- Only designated departments and representatives manage relations with public institutions, in compliance with local laws and standards.
- Authorized representatives are registered with relevant transparency registers where required, adhering to all local regulations on representation of interests.
- Communication and accreditation channels are transparent, legitimate, and clearly identify the organization and the interests represented.

Integrity and Ethical Standards

- Ethical-professional due diligence is conducted on intermediaries, who are required to uphold Company standards and follow the Responsible Lobbying Policy.
- The Company respects statutory waiting periods before hiring former public decision-makers.
- The independence of experts is maintained to protect the integrity and objectivity of scientific and technical opinions.

Political Neutrality and Restrictions

- The Company is committed to political neutrality, avoiding any contributions to political parties, politicians, or related fundraising activities.
- Charitable donations and philanthropy are managed transparently to avoid hidden contributions.
- Employees engaged in public affairs are prohibited from holding national or international political office.

GOVERNANCE, ROLES AND RESPONSIBILITIES

The highest responsibility for Iveco Group's Public Affairs lies with the Senior Leadership Team (SLT), and specifically in the Chief Public Affairs and Sustainability Officer.

The Public Affairs function is responsible at global level for overseeing advocacy activities and the engagement with institutions and stakeholders.

MONITORING AND IMPLEMENTATION

Iveco Group is committed to monitoring and implementing its lobbying activities in line with regulatory requirements and internal standards. Regular evaluations shall be conducted to ensure compliance. Iveco Group provides regular updates on its lobbying activities through public reporting when required by law. This commitment to monitoring, transparent reporting, and continuous improvement ensures that Iveco Group's Public Affairs align with both ethical standards and strategic objectives.

GRIEVANCE MECHANISM AND ANTI-RETALIATION

Iveco Group has implemented the Compliance Helpline as a mean for Iveco Group employees, customers, suppliers, and other third parties to report potential violations of applicable laws, Company policies, or the Code of Conduct. Matters may be submitted to the Compliance Helpline anonymously (to the extent legally permitted). Iveco Group also has an Anti-Retaliation Policy that prohibits retaliation of any kind against any person who submits a matter in good faith or participates in an investigation.

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DISSEMINATION

This Policy shall be disseminated among all employees and made available on the Iveco Group website to all stakeholders.

Iveco Group will take adequate disciplinary measures in relation to Iveco Group personnel (i) whose actions are shown to violate this Policy (ii) who unreasonably fail to detect or report any violations or who threaten or carry out retaliatory actions against others who report such violations.

Disciplinary measures may include termination of employment.

ADDITIONAL INFORMATION

This Policy supplements information in our Code of Conduct and should be read in conjunction with other Company Policies, including:

- Iveco Group Anti-Corruption Policy
- Iveco Group Conflicts of Interest Policy
- Iveco Group Speak Up Policy
- Iveco Group Anti-Retaliation Policy