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# IVECO GROUP N.V. STAKEHOLDER DIALOGUE POLICY ON SUSTAINABLE STRATEGY

### 1. INTRODUCTION AND GOVERNANCE

- 1. Iveco Group N.V. (*Iveco Group* or the *Company*) has adopted a robust governance model to oversee and implement its commitment to sustainable long-term value creation, complementing and supporting the overarching responsibility of the Board of Directors of the Company (the *Board*) through the appointment of an ad-hoc Board committee (the ESG Committee, operating as per the specific Charter) as well as entrusting the Company's Senior Leadership Team with the role of Sustainability Committee.
- 2. Specifically, the SLT Sustainability Committee is responsible for: providing leadership, identifying the sustainability strategy, integrating the sustainability strategy with business needs. Through its monthly meetings the SLT Sustainability Committee ensures regular updates on Iveco Group's sustainability performance and a continuous focus on sustainability priorities and targets at top management level.
- 3. In the meantime, an activity of day-by-day coordination and overview of the Company's sustainability efforts is performed across Iveco Group on an ongoing basis by Institutional Relations & Sustainability and within such corporate function by the Sustainability department.

# 2. SCOPE AND PURPOSE

- 1. Consistently with the governance approach described above, the Company has adopted this policy to govern the dialogue with its relevant stakeholders on the sustainability aspects of the Company's strategy in accordance with section 1.1.5 of the Dutch Corporate Governance Code (the *Policy*). This Policy has been adopted by the Board on October 31, 2023.
- In pursuing the creation of long-term value that is truly sustainable, the Company cherishes among its priorities due consideration of its relevant stakeholders' interests. Iveco Group is aware that different stakeholders are motivated by equally legitimate, but different (possibly conflicting) interests and concerns, among which it is its responsibility to mediate in the definition of its strategy, while simultaneously complying with applicable and evolving rules and regulations and abiding by its values, in the legitimate enhancement of its own legitimate interests, including continuity.
- 3. The Company engages with its stakeholders at multiple levels and in a variety of ways, depending on the purpose of the engagement, the matter to be addressed, the nature of the stakeholder. This includes where appropriate accepting and/or promoting an open and constructive dialogue in respect of the sustainability aspects of the Company's strategy.

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#### 3. STAKEHOLDER INTELLIGENCE

- 1. The Company is committed to take into account how its activities, products and services affect people (including its own workforce) and the environment. In order to weigh their interests in an appropriate manner, Iveco Group strives to identify, evaluate, understand and respond to its different stakeholders, as it believes this is conducive to sustainable long-term value creation.
- 2. To this end, with a view to the definition (as well as the monitoring and assessment) of the sustainability aspects of the Company's strategy and performance, the Company identifies, maps, prioritizes and selects key stakeholders that are relevant to the specific aspect to be addressed.

#### 4. SUSTAINABILITY DISCLOSURE

- 1. The foundation of the Company's engagement policy towards its stakeholders vis-à-vis sustainability issues is a transparent communication of the Company's sustainability goals, concerns, priorities, risks and achievements, subject to the Company' commitment to strict compliance with its legal obligations relating to confidentiality and the disclosure of inside information as well as the Company's legitimate pursuing of its legitimate interests.
- 2. Sustainability disclosure is part of the overall corporate disclosure and is enacted through the same channels and instruments, subject to the direction and overview of the Head of Sustainability, who liaises if need be with the managers in charge of the relevant aspects, primarily the Chief Accounting Officer, the Head of IR and the Head of Communications.
- 3. The purport and extent of the sustainability disclosure beyond applicable legal and/or regulatory disclosure requirements are the responsibility of the Board, which is supported and advised in its choices as above.

### 5. BILATERAL CONTACTS WITH STAKEHOLDERS

- 1. The Company engages in bilateral contacts with relevant stakeholders on the sustainability aspects of its strategy through the departments and managers in charge of the relevant profiles, subject to the overview of the Head of Sustainability. These bilateral contacts and the subsequent dialogue take place either at the initiative of the Company or at the initiative of stakeholders.
- 2. During these interactions the Company is generally represented at a managerial level. However, in certain circumstances either the Executive Directors or the Chair of the ESG Committee may lead the discussion with qualified stakeholders. As a rule, the request of a stakeholder to meet with one or more members of the Board on the sustainability aspects of the Company's strategy shall be assessed by the Chair of the ESG Committee jointly with the Senior Non-Executive Director, in liaison with the Executive Directors.
- 3. Depending on the sustainability aspect of its strategy at stake, the Company will select the appropriate stakeholder(s) to engage in a proactive way. The discretionary selection

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will consider – inter alia – the stakeholders' influence, authoritativeness, representativeness, expertise, expectations, commitment and willingness to engage in an open and effective dialogue, as assessed internally, based on available information gathered from public sources or provided on request.

- 4. The Company will determine at its sole discretion whether to accept invitations to engage in bilateral contacts with stakeholders and it reserves the right to accept invitations only for those conversations where this is considered in the Company's interest.
- 5. The Company can request stakeholders to provide certain written information in order to assess whether entering into a dialogue with them would be in the interest of the Company. This information can include the objectives of the conversation, the matters to be discussed and the stakeholder's view on these matters, and/or further clarification of the stakeholder's objectives and engagement intentions.
- 6. The ultimate decision whether to enter into a bilateral conversation with a specific stakeholder (or class of stakeholders) on a specific sustainability aspect is the responsibility of the Board, that is supported and advised in its choices as above and will take into account the interests of the Company and all stakeholders when making its decisions.

## 6. INSIDE INFORMATION

- 1. The Company is committed to providing high quality, clear, accurate and timely disclosure to the general public in compliance with applicable standards, rules and regulations, in particular those concerning selective disclosure and inside information.
- 2. The Company is committed to adhering to its legal obligations relating to confidentiality and the disclosure of inside information and strives to disclose in bilateral contacts only information that does not qualify as inside information. In the event that non-public inside information is inadvertently disclosed during any bilateral contact, the Company will publicly announce such information as prescribed by applicable law.

### 7. MISCELLANEOUS

- 1. For any further information or questions with respect to this Policy, please contact the Company's Head of Sustainability, Ms. Annalisa Citterio (ivgsustainability@ivecogroup.com).
- 2. A copy of this Policy is published on the Company's website (<a href="www.ivecogroup.com">www.ivecogroup.com</a>). This Policy may be amended by a resolution of the Board. Any amendments will be published on the Company's website.
- 3. This Policy enters into effect on November 1, 2023.

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