

# HUMAN RIGHTS STATEMENT **2023**

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**INTEGRITY**  
ALWAYS,  
EVERYWHERE.



HUMAN RIGHTS  
STATEMENT 2023  
OF IVECO GROUP N.V.  
AND ALL ITS SUBSIDIARIES <sup>(\*)</sup>

<sup>(\*)</sup>This Statement sets out the steps taken by Iveco Limited, Iveco Holdings Limited, IC Financial Services UK Limited all of which fall within the scope of Section 54(2) of the Modern Slavery Act 2015



## OUR ORGANIZATIONAL STRUCTURE

Iveco Group N.V. is a global automotive leader active in the Commercial & Specialty Vehicles, Powertrain and related Financial Services arenas. The Company's statutory seat is in Amsterdam, the Netherlands, its headquarters are in Turin, Italy, and its common shares are listed on Euronext Milan.

## OUR BUSINESS

Each of Iveco Group's 8 brands is a major force in its specific line of business: IVECO, a pioneering commercial vehicles brand that designs, manufactures and markets heavy, medium and light-duty trucks; FPT Industrial, a global leader in advanced powertrain technologies, offering a vast array of solutions in the agriculture, construction, marine, power generation and commercial vehicles sectors; IVECO BUS and HEULIEZ, both premium mass-transit bus and coach brands; IDV, for highly-specialised defence and civil protection equipment; ASTRA, a leader in large-scale heavy-duty quarry and construction vehicles; MAGIRUS, industry-renowned firefighting vehicle and equipment manufacturer; and IVECO CAPITAL, the finance arm supporting them all.

## OUR COMMITMENT ON RESPECT OF HUMAN RIGHTS

Iveco Group is committed to creating long-term sustainable value for all our stakeholders and believes that upholding fundamental human rights and ensuring decent working conditions is a prerequisite for achieving such results. We uphold the protection of these rights in all our operations and seek to promote respect for the same principles by others over whom we have influence, including our contractors, suppliers and all other entities and individuals with whom we have a business relationship. Furthermore, we will not establish or continue a relationship with any counterpart that refuses to respect the principles of the **Iveco Group Code of Conduct**, which explicitly endorses the protection of human rights.



## OUR CODE OF CONDUCT

The Code of Conduct summarises the values we recognise, adhere to and promote, in the belief that integrity and fairness are important drivers of long-term value creation and social and economic development.

The Iveco Group Code of Conduct is an integral part of our internal control systems. It applies to all Iveco Group directors, officers and employees, as well as to those acting for or on behalf of any Iveco Group Company worldwide (including all joint ventures in which the Company holds a controlling interest).

Among other things, the Code of Conduct addresses the ethical aspects of economic, social and environmental issues. Explicit reference is made to the UN Declaration of Human Rights, the relevant International Labour Organization (ILO) Conventions, and the OECD<sup>1</sup> Guidelines for Multinational Companies.

In July 2023, the Iveco Group Board of Directors approved a revised version of our Code of Conduct, containing an updated message from our Chairperson and CEO, as well as our new corporate purpose and values. It also emphasises our commitment to tax compliance through the design and implementation of a Tax Control Framework and the promotion of a cooperative and transparent approach to tax authorities. Furthermore, it outlines our commitment to fostering diversity, equity and inclusion (DEI) in the workplace and using inclusive language, consistent with our DEI Playbook.

Our **2023 Code of Conduct training course** which includes 3 modules – Anti-Bribery and Anti-Corruption, Antitrust and Competition Law, and Speaking Out and Preventing Retaliation (regarding the Compliance Helpline) – was made available to approximately 12,415 employees worldwide (salaried and above), for a total of 4,553 hours<sup>2</sup>.

Click here [link ↗](#) to view our **Code of Conduct**.

(1) Organisation for Economic Co-operation and Development.

(2) Data as of 31 January 2024.

## OUR SUPPLIER CODE OF CONDUCT

Alongside the Iveco Group Code of Conduct, the Company has issued a Supplier Code of Conduct that provides a framework for responsible supply chain management. Compliance with the Supplier Code of Conduct is a mandatory requirement for continuing business relations with the Company. In addition to compliance with local legislation, the Supplier Code of Conduct calls for observance of human rights, decent working conditions and respect for the environment, trade restrictions/export controls and business ethics, including prohibiting all forms of human trafficking (whether by force, fraud or coercion), all forms of involuntary servitude, slavery, forced labour, sex trafficking and commercial sex activities.

As highlighted in the Supplier Code of Conduct, Suppliers must work with Iveco Group to enforce the Code itself and are required to transfer its principles to their employees, subsidiaries, affiliates and subcontractors. To ensure the consistent alignment of our supply chain and purchasing practices with the Supplier Code of Conduct, suppliers undergo an Ethical Check every three years. This assessment is conducted by an external third party using a dedicated reporting system that allows us to monitor any potential issues that may require further clarification or investigation. This periodic monitoring is regulated by Company policies and procedures designed to ensure supplier compliance.

In 2023, a training module on Iveco Group's Supplier Code of Conduct was developed and delivered to our supplier base and our employees.

All suppliers must comply with applicable laws (including, but not limited to, anti-corruption and antitrust regulations) and with our Supplier Code of Conduct and are obliged to report any suspected violations thereof to the Company. To this end, they have access to an operational grievance mechanism, the Compliance Helpline (details of which are available in the Supplier Code of Conduct), to report potential violations of corporate policies, the Code of Conduct or applicable laws. Any violation by suppliers may result in the termination of the business relationship with Iveco Group.

Supplier Code of Conduct training materials were made available to our suppliers through the Supplier Portal.

Click here [link ↗](#) to view our **Supplier Code of Conduct**.

# OUR HUMAN RIGHTS POLICY

Our commitment to Human Rights is also specified in our **Human Rights Policy**, which supplements the Iveco Group Code of Conduct, and in the Supplier Code of Conduct.

The human rights principles included in the aforementioned documents are consistent with the spirit and intent of the United Nations (UN) Universal Declaration of Human Rights, the OECD Guidelines for Multinational Companies, and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

Our Human Rights Policy outlines Iveco Group's commitment to preventing human trafficking and slavery, including in its supply chain, in compliance with, among others, the California Transparency in Supply Chains Act, the Human Trafficking Prevention Act, the UK Modern Slavery Act 2015 and similar laws such as the Australian Modern Slavery Act 2018 and the 2022 Norwegian Transparency Act. As outlined in our Human Rights Policy, Iveco Group does not tolerate the use of forced or mandatory labour, slavery, human trafficking or sex trafficking by any covered person<sup>3</sup>. Human trafficking is defined as arranging or facilitating the recruitment, transportation, transfer, harbouring or receipt of people through force, fraud or deception with the aim of exploiting them for profit. It is immaterial whether these people are coerced or deceived into consenting to such activities.

For more information please refer to the **Human and Labour Rights Management section** on page 113 of our **2023 Sustainability Report** [↘](#)

Please **visit** our **Human Rights Policy** at this **link** [↘](#)

(3) Covered persons collectively include Iveco Group N.V. and its subsidiaries; the directors, officers and employees of such entities; and those acting for or on behalf of such entities, comprising all parties with whom the Company conducts business, including, but not limited to suppliers, service providers, sales representatives, agents, consultants, dealers, distributors, importers, resellers and joint venture partners.

# OUR SUPPLY CHAIN

Iveco Group manages purchases worth almost €10.4 billion, with a total network of 1,926 direct material suppliers. In 2023, 19 new eligible suppliers were added to our network, while there were no significant changes to the supply chain structure and no additional outsourcing of activities. Our top 150 suppliers are considered strategic not only because they generate 79% of the total value of our purchases, but also due to the longevity of our relationships with them and the extent of their production capacity and capability for handling spare parts.

The targets we have set ourselves include developing local skills, transferring our technical and managerial expertise and strengthening local businesses. We strive to build strong long-term relationships with local suppliers as this leads to fewer risks associated with business operations and optimises costs. Significant amounts are spent with local suppliers<sup>4</sup>: in 2023, the contracts signed with them accounted for 97% of Iveco Group’s procurement costs. Furthermore, 97% of these contracts were signed in Europe, our primary location of operation<sup>5</sup>.

## Suppliers in Numbers

Iveco Group worldwide

|   | 2023  |
|---|-------|
| Direct and indirect material purchases <sup>a</sup><br>(% of the total volume of Iveco Group purchases) | 85    |
| Direct material suppliers (no.)   | 1,926 |
| Value of purchases from direct material suppliers <sup>b</sup> (€billion)                               | 7.6   |
| Value of purchases from indirect material suppliers <sup>c</sup> (€billion)                             | 1.2   |
| Local suppliers (%)   | 97    |

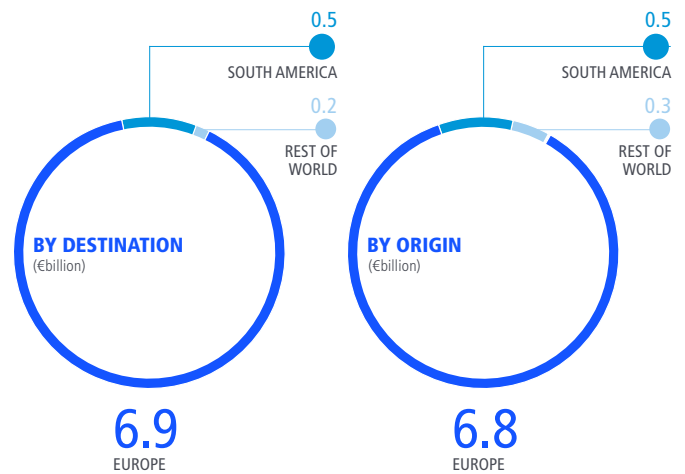
<sup>(a)</sup> Refers to the value of purchases.

<sup>(b)</sup> Direct materials are preassembled components and systems used in assembly. The value of raw material purchases is considered marginal.

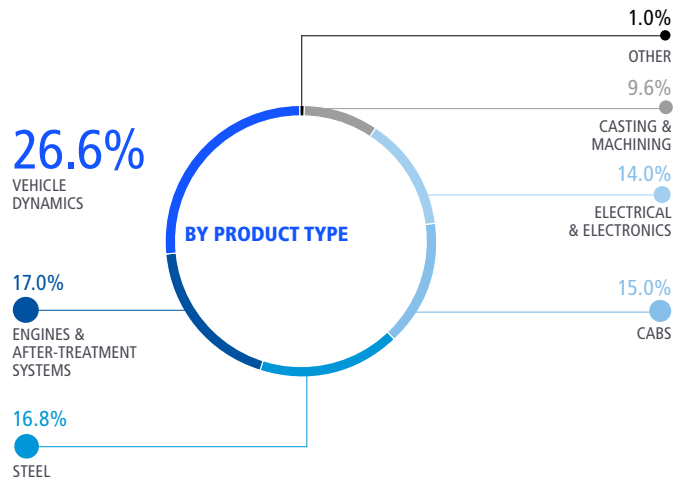
<sup>(c)</sup> Indirect materials are services, machinery, equipment, etc.

## 2023 Purchases<sup>a</sup>

Iveco Group worldwide



<sup>(a)</sup> Refers to the value of direct material purchases.



For more information, please refer to the [Supplier Profile](#), on page 156 of our [2023 Sustainability Report](#), [link ↗](#)

<sup>(4)</sup> Local suppliers are those operating in the same country as the Iveco Group plant in question.

<sup>(5)</sup> The significant locations of operation are defined by total direct material purchases. Europe represents our primary location of operation as its direct material purchases account for 88% of the total value of our purchases.

## SUPPLIER SELECTION

Supplier selection is not only based on the quality and competitiveness of the supplier's products and services, but also on compliance with our social, ethical and environmental principles. The supplier assessment process is built on objective criteria and tools designed to ensure fairness and equal opportunities for all involved parties. New suppliers are required to sign a formal **Commitment Declaration** through which they agree to comply with both our Company's Code of Conduct and Supplier Code of Conduct. Specific contractual clauses require our suppliers to provide references and demonstrate abilities relating to fighting corruption, safeguarding the environment, promoting health and safety at work, ensuring non-discrimination, prohibiting forced and/or child labour, and recognising freedom of association.

If a supplier fails to adhere to these principles, the Company reserves the right to terminate the business relationship or instruct the supplier to implement an acceptable corrective action plan.

For more information, please refer to the **Supplier Selection section** on page 159 of our **2023 Sustainability Report**, [link ↘](#)



## CONFLICT MINERALS

Another demonstration of Iveco Group's respect for human rights is its stand against the use of natural resources extracted in conflict zones. To this end, we have adopted a compliance programme and a Conflict Minerals Policy intended to promote the responsible sourcing of tin, tantalum, tungsten and gold (referred to as conflict minerals or 3TG) from the Democratic Republic of Congo (DRC) and other countries or areas considered at high risk of conflict<sup>6</sup>, where revenues from their extraction have historically funded armed conflict and human rights abuses.

The Conflict Minerals Policy and General Purchasing Terms and Conditions (GPTC) require affected suppliers to conduct a reasonably comprehensive enquiry into the existence and origins of any 3TG in their respective supply chains and to provide written evidence of due diligence by completing the Conflict Minerals Reporting Template (CMRT), in line with Regulation (EU) 2017/821 and subsequent amendments. The Company's due diligence process and measures have been designed to conform, in all material respects, with the due diligence framework presented by the Organisation for Economic Co-operation and Development (OECD) in its 2016 publication *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*<sup>7</sup>, including its Supplements on gold, tin, tantalum and tungsten. This due diligence framework is also known as the OECD Guidance. We are committed to making every reasonable effort to establish, and require affected suppliers to disclose, whether purchased products contain 3TG obtained from sources that fund armed conflict or support inhumane treatment in the DRC or other countries or areas considered at high risk of conflict<sup>8</sup>.

We have processes in place to record and act on concerns expressed by employees and others about possible improper or unethical business practices or violations of Company policies (including our Code of Conduct, Supplier Code of Conduct and Conflict Minerals Policy) or applicable laws. This grievance mechanism is described in our Conflict Minerals Policy.

Iveco Group implements the globally recognised Compliance Data Exchange (CDX) software for conflict mineral management. We chose CDX because it interfaces directly with the International Material Data System (IMDS) that we have used for years to manage Substances of Concern (SoC) in our vehicles. Through the CDX software, we are able to evaluate the conflict minerals report templates (CMRT) submitted by about 100 suppliers for a sample of products, and to automatically verify and file the subsequent reports. This setup also enables suppliers' direct involvement in a qualitative crosscheck analysis of CMRT templates against the chemical compositions stated in the respective Material Data Sheets (MDS). Of the suppliers requested to complete the CMRT in 2023, 90% did so as per OECD guidelines, and our Procurement Department

will chase up the others. If the products sold to Iveco Group do contain 3TG, suppliers must identify their sources and eliminate procurement, as soon as commercially feasible, of products containing 3TG obtained from sources that fund or support inhumane treatment in the DRC or other countries or areas considered at high risk of conflict. We reserve the right to reassess future business dealings with suppliers that fail to comply with this policy.

### RESPONSIBLE USE OF COBALT

Cobalt is becoming an important material for Iveco Group, being a key element in the lithium-ion rechargeable batteries used in electric vehicles that, as we know, play a significant role in reducing greenhouse gas and polluting emissions. Cobalt is also used in the production of magnetic, wear-resistant, and high-strength engineering alloys, properties that are critical in efficient vehicle design.

The world's largest producer of cobalt is the Democratic Republic of the Congo (DRC), holding more than 50% of global cobalt reserves. In recent years, annual cobalt consumption globally has trended upwards and is expected to rise significantly over the medium term. However, many reports have highlighted concerns over the social and environmental impacts of cobalt extraction, including the use of child labour and unsafe working conditions in artisanal cobalt mining operations.

Having previously benchmarked various companies' best practices under our former corporate structure, in 2023, we surveyed key lithium-ion battery suppliers on their sourcing information in light of our plan to implement a wider due diligence process on the responsible sourcing of cobalt throughout our supply chain.

Furthermore, in light of the recently published EU Regulation 2023/1542 on batteries and waste batteries that introduced a new due diligence policy for several raw materials contained in batteries – cobalt, natural graphite, lithium and nickel – we have readied ourselves to work with our supply chain and all other stakeholders to evaluate the social and environmental risks of using them.

For more information, please refer to the [Supplier Conflict Minerals section](#) on page 116 of our [2023 Sustainability Report, link ↘](#)

(6) See CAHRA's list

(7) See OECD *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*

(8) See OECD *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*



## RISK ASSESSMENT, DUE DILIGENCE AND STEPS TO MITIGATE RISKS

Iveco Group monitors respect for human rights across its internal operations and throughout its supply chain and customer base by means of dedicated processes for each area.

Iveco Group carried out a materiality analysis, applying the revised approach to materiality introduced by the GRI Universal Standards<sup>9</sup> published in 2021. This new approach focuses on the identification of topics that are likely to be material for an organisation based on the latter's most significant impacts (whether positive or negative, actual or potential) on the economy, the environment and people (including on human rights). This inside-out perspective, which considers the impacts that are or could be generated by a company, was adopted when performing Iveco Group's impact materiality analysis, as per the GRI requirements.

Iveco Group handles the risks associated with human rights violations through its Enterprise Risk Management (ERM) system. Based on our ERM methodology, a risk is defined as any event that could affect our ability to meet our objectives. This approach enables us to identify risks and evaluate their significance in a timely manner, giving us the ability to take action to mitigate and, where possible, eliminate them.

*(9) The Global Reporting Initiative (GRI) is a multi-stakeholder association for the development and disclosure of standards for reporting on an organisation's economic, environmental and/or social impacts.*



## OUR SUPPLY CHAIN

As regards suppliers, it is important to prevent or minimise any environmental or social impact arising from or related to the supply chain. To do so, Iveco Group assesses its suppliers on sustainability issues by means of sustainability self-assessments, risk assessments and sustainability audits, and implements a specific operational procedure to monitor their compliance and risks.

The assessment process involves 3 consecutive steps over a 1-year period. During the first step of the evaluation, suppliers are asked to fill out a sustainability self-assessment questionnaire. Iveco Group uses Open-es, a digital platform designed to engage companies on a shared journey towards sustainability performance improvement. The platform is an interactive ecosystem in which Iveco Group serves as a Value Chain Partner, playing an active role alongside its suppliers. All companies within this ecosystem collaborate and compete on sustainability matters with a sense of purpose to create tangible, long-term value across the entire production chain.

In 2023, we identified 77 suppliers globally as potentially posing risks based on the following criteria:

- supplier turnover
- risk associated with the supplier's country of operation
- supplier financial risk /
- level of participation in the assessment process
- risk associated with the purchasing category.

These suppliers were subsequently audited by independent third-party auditors. Issues were identified for 11 of them, and a total of 15 corrective action plans were agreed upon to address human rights issues in need of improvement.

The improvement measures included:

- promoting internal communication and engagement
- facilitating consultations and providing up-to-date guidelines and operating instructions to all employees
- formalising processes and/or procedures for managing the risk of child labour and human rights violations.

Action plans are monitored through follow-up meetings between each supplier and the Company auditor. In cases of defaulting suppliers, further corrective actions are defined and implemented in agreement with the relevant internal departments.

According to the assessment process, in 2023, no suppliers were considered at risk in terms of child labour, forced or compulsory labour, or violation of either freedom of association or collective bargaining. To the Company's knowledge, there is no use of child or forced labour at its suppliers' plants.

To monitor our suppliers' ESG performance, we ask them to register on the Open-es platform and complete the questionnaire on the ESG Profile section. This is based on the 4 pillars of the World Economic Forum's non-financial sustainability reporting framework, and its questions cover People, Prosperity, Planet and Principles of Governance.

The self-assessment questionnaires are then analysed and used in-house to perform a sustainability risk assessment, which enables the identification of critical suppliers whose compliance with sustainability criteria needs to be addressed. These suppliers are identified based on specific criteria, such as whether or not they have shared their Open-es ESG score and relevant evaluation with Iveco Group.

Supplier monitoring uses a comprehensive dashboard that contains all relevant KPIs, organised in weighted, normalised clusters that are grouped into two categories: Performance and Reliability. These KPIs enable us to evaluate each supplier in terms of their quality, delivery behaviour, ESG performance and business relevance. Monitoring all KPIs through a single dashboard provides a comprehensive overview of a supplier's performance, ultimately optimising our decision-making. The main risks we consider in our screening process for significant suppliers are sector- and commodity-specific.

This centralised approach allows for the prompt identification of trends and potential issues across different sectors, and areas for improvement, enabling proactive management and the swift implementation of corrective measures where needed.

Sustainability audits are organised in agreement with the suppliers and performed by independent third-party auditors at their plants. The aim is to check the information submitted via the self-assessment questionnaires and define possible improvement plans where necessary.

In 2023, the sustainability audits were performed throughout the second half of the year.

Each supplier selects a manager and other representatives (usually from Human Resources, Safety, Environment, and Quality) to take part in the audit. If these reveal critical issues that need addressing, joint action plans are drawn up with the suppliers to define:

- improvement areas (e.g., implementation of internal procedures in line with sustainability principles)
- responsibilities (which could entail organisational changes)
- corrective measures (e.g., targeted training programmes)
- timeframes for action plans.

Action plans are monitored through follow-up meetings between the supplier and auditor, under the supervision of our Supply Chain Sustainability function. At the end of the follow-up period, action plan results are collected and analysed for compliance, following a dedicated operational procedure. In cases of defaulting suppliers, further corrective actions are defined and implemented in agreement with the relevant internal departments.

Sustainability performance, along with each supplier's financial, technical and logistics data, make up the Summary by Plan document that we use to assign new orders. Open-es memberships are tracked via the platform itself. The sustainability score is not a determining factor for supplier qualification yet; however, the Company will make it a mandatory prerequisite for new product sourcing by year-end 2024.

In 2023, we continued to encourage our direct material suppliers to join the Open-es platform as primary initiative for increasing supplier engagement and awareness on sustainability matters.

We organised 4 digital workshops around the Open-es platform for our supplier base worldwide, with two held for the onboarding of new suppliers and two to provide updates on the new features of the platform. On each occasion, we also provided information and training on our supplier ESG programme, processes, and requirements. The combined sessions involved more than 500 participants. We also launched a further onboarding campaign focused on the platform's many useful functions and features, delivered via ad hoc communications, user manuals, and targeted meetings with suppliers.

The suppliers that registered on the platform represent approximately 82% of direct material purchases. Moreover, their average progress in completing the Open-es questionnaire (78%) is a clear reflection of their willingness to join us on our path and to share their progress with us.

In 2023, sustainability audits were conducted at 77 supplier plants worldwide, involving 77 suppliers.

Globally, the total number of audits covered approximately 7% of our total purchase value. In 2023, 40 suppliers were involved in creating corrective action plans (against 144 findings) for areas in need of improvement. No critical issues emerged from the audits and therefore no contracts were suspended or terminated.

For more information, please refer to the [Supplier Evaluation section](#) on page 116 [link ↘](#), and the [Supplier Assessment section](#) on page 159 [link ↘](#) of our 2023 Sustainability Report.



## ONGOING DIALOGUE WITH SUPPLIERS

We are firmly convinced that suppliers are key to our sustainable growth, which is why we

do our best to keep them engaged and informed at all times. This continuous dialogue and

exchange allows us to strengthen supplier relationships, providing fertile ground for shared goals and strategies, and thriving collaborations and joint projects – as evidenced by our

many long-standing and mutually beneficial alliances.

In 2023, several initiatives promoting the exchange of ideas and information with suppliers continued, as in previous years.

In May, we held our first-ever Iveco Group Supplier Convention in **Turin** (Italy), themed 'Connecting the dots', where we presented the Company, its challenges and strategic priorities. Above all, it gave us the opportunity to emphasise the importance of our supplier relationships, and their influence in generating synergies, support and proactivity. The event, attended by almost 300 participants from around the world, sparked significant interest and debate during the Q&A session.

In July, we organised a Supplier Meeting in **Belo Horizonte** (Brazil) to share strategies and reinforce alliances with our suppliers. During the event, the best performers from the 84 attending companies were presented with awards in 5 categories for their contributions to: Customer Services, Technology and Innovation, Business Relationships, Quality and ESG. We also hosted a dedicated event to showcase our ESG projects, inviting all suppliers from South America to participate and share their own initiatives, which led to the registration and presentation of 29 projects.

In November, we invited our suppliers to our 1st Latin America Sustainability Meeting, held at our plant in Sete Lagoas (Brazil). Our Head of Sustainability presented Iveco Group's sustainability strategy to the 56 attending companies, highlighting the importance of partnership projects to create a positive impact. It was also an opportunity to share the best practices implemented by the Company and suppliers.



# HUMAN RIGHTS ASSESSMENTS

To monitor human rights across internal operations, we have set up a structured process that helps us identify potential risk/non-compliance areas in need of further assessment and implement mitigation measures accordingly.

The initial self-assessment phase of this process, overseen by the HR Department in the country of reference, covers compliance with our Human Rights Policy and international human rights standards. A second phase of on-site audits analyses any critical issues that emerged from the self-assessments and defines any required remedial actions, with a view to continuous improvement.

The Company also conducts detailed human and labour rights risk assessments when acquiring significant new businesses, operations, and projects. Such assessments may be conducted during the relevant due diligence process and often with the assistance of specialised external law firms or other professional advisors.

To monitor respect for human rights within our internal operations, each year, the Company conducts an impact assessment survey involving several countries selected in rotation to cover 100% of internal operations every 3 years. The aim of the survey, which is based on self-assessment questionnaires filled out by Iveco Group's HR country managers, is to identify and prevent any adverse corporate impacts on the following human rights aspects:

- non-discrimination and the right to equal remuneration (also covering the rights of women, indigenous people and migrants)
- child labour and young workers
- forced labour (including human trafficking)
- harassment
- freedom of association (including the right to collective bargaining)
- occupational health and safety.

The impact assessment also focuses on the promotion of local communities' social and economic development based on their specific needs.

In both of the past 2 years, and in each geographic area evaluated, the assessment confirmed the presence of policies and controls designed to ensure respect for human rights, in line with local legal requirements, and did not identify any particular concerns or issues, including in relation to child or forced labour and freedom of association. The assessments complied with the requirements of Art. 17 and 18 of the Guiding Principles on Business and Human Rights, 2011<sup>11</sup> (the Ruggie Framework).

Every year, we also perform a specific assessment of the entire workforce on the presence of child labour across Iveco Group's legal entities and the level of compliance with our Code of Conduct's child labour principles. The survey conducted in 2023 on 100% of our total workforce<sup>12</sup> confirmed that none of our legal entities employed individuals under the statutory minimum age for

employment or apprenticeship set by local legislation. The survey also showed that no minor under the age of 18 employed by Iveco Group under a regular employment or apprenticeship contract was exposed to hazardous working conditions<sup>13</sup>.

For more information, please refer to the [Internal Operations section](#) on page 117 of our [2023 Sustainability Report, link ↗](#)

As per our risk management process, initial self-assessments of our performance in terms of respect for human rights across our legal entities and internal operations are subsequently verified by our Internal Audit Department through specific audit engagements, conducted either on-site or remotely (the latter when in-person audits are unnecessary or unsuitable). The areas posing a potential risk to human rights are identified based on the outcomes of the specific self-assessments, or of the periodic Risk Assessment (RA) performed by Internal Audit. The RA entails examining and evaluating the risk associated with each of the Company's auditable legal entities, units, functions, processes and cross-functional projects or activities.

It also considers significant risk information that may emerge from aligned assurance<sup>14</sup> activities conducted with Iveco Group's Senior Management and relevant functions (Enterprise Risk Management - ERM; Compliance; Energy, Environment, Health and Safety - EEHS; and Sustainability). Additional risks to human rights may also be identified through complaints or whistleblowing reports received via the Compliance Helpline. On-site audits are then planned accordingly.

On-site audits involve verifying the accuracy and completeness of the information disclosed by Iveco Group's HR country managers, reviewing any documents and interviewing the managers of the areas under audit. A report is created to keep track of all relevant information on human rights issues and any improvement measures identified by the audits. The report is subsequently passed on to the relevant corporate functions, along with any required mitigation measures.

In 2023, our Internal Audit Department conducted a human rights compliance audit at our Bus plant in Vysoke Myto (Czech Republic) to assess the condition of its facilities and production lines. The audit confirmed that the plant adheres to the human rights principles outlined in our Code of Conduct and Human Rights Policy and local regulations. It also suggested the plant should renovate some ageing facilities to ensure excellent working conditions are maintained, and to discourage workers from smoking in common areas near the welding shop and assembly line.

(11) United Nations' Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework 2011.

(12) Survey conducted on the total workforce as of 31 October 2023

(13) For the purposes of the assessment, hazardous working conditions include work with dangerous machinery, equipment or tools; the manual handling or transport of heavy loads; exposure to hazardous substances, agents or processes; exposure to health-damaging temperatures, noise levels, or vibrations; and work under particularly difficult conditions (long hours or night shifts).

(14) A coordinated and collaborative approach to evaluating and ensuring the effectiveness of risk management and control processes across various functions or units within an organisation.



# INTEGRITY ALWAYS, EVERYWHERE.

## COMPLIANCE HELPLINE

We have established a Compliance Helpline, a global reporting tool available in 15 languages and managed by an independent third party.

This communication channel provides our employees, customers, suppliers and other third parties with a dedicated means to report potential violations of applicable laws, the Code of Conduct, the Supplier Code of Conduct or Company policies.

Reports may also be submitted anonymously, where allowed by the law. The Company takes all reports seriously. All reports are investigated thoroughly, professionally, and as confidentially as possible. Iveco Group does not tolerate any form of retaliation against anyone who has reported possible violations in good faith.

For more information please [visit our Compliance Helpline](#)  
[www.ivecogroupcompliancehelpline.com](http://www.ivecogroupcompliancehelpline.com) ↴

and refer to the [Iveco Group Anti-Retaliation Policy link](#) ↴

This statement was approved by Iveco Group N.V.'s Board of Directors on June 19, 2024



**GERRIT MARX**  
**EXECUTIVE DIRECTOR**  
**AND CHIEF EXECUTIVE OFFICER**

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