POLICY ON COMPLIANCE WITH REGULATIONS GOVERNING ECONOMIC SANCTIONS AND EXPORT CONTROL
JUNE 2026

All those working for the Pirelli Group, both in Italy and abroad, and/or who act for and/or on behalf and/or in the interests of the Group must comply with all applicable laws and regulations and maintain the highest professional and ethical standards in all their business.

Such applicable laws and regulations include, amongst others, commercial and financial restrictions such as sanctions, embargoes and laws governing imports and exports, as well as customs rules, wherever such may apply to the Group's business and regardless of where such business is conducted.

In line with these principles, Pirelli intends to act in compliance at all times with all rules and regulations issued by national, international and supranational authorities imposing total or partial restrictions on commercial and financial relations with certain countries and/or specific subjects and entities (governments, organizations, groups, political entourages, enterprises or natural persons). This includes the continuous monitoring of regulations, the implementation of internal controls and employee training to prevent risks of non-compliance and ensure transparent and compliant operations by all Group companies, regardless of their country of establishment.

Merely by way of example, such authorities include: the US Treasury Department Office of Foreign Assets Control (OFAC); the United Nations Security Council; the bodies of the European Union (EU); and the UK Office for Financial Sanctions Implementation (OFSI), as well as any other competent national, international or supranational authority.

In light of this Policy, the Pirelli Group and competent local departments are called to carefully monitor, before signing any agreements, any potential application of commercial and/or financial restrictive measures or sanctions with respect to the type of product or service supplied/purchased and the specific country/ies involved in the transaction, as well as to carefully select their contractual counterparties, only making commitments with those permitted by the above regulatory framework.

The Chief Financial Officer (CFO) of each individual Pirelli Group company is obliged to ensure compliance with any restrictions that may impact the management of banking and treasury services (e.g. through the blocking or suspension of payments to such certain natural persons or legal entities by the central and/or local treasury services) as well as, without delay, to inform the Local or Group Compliance Department and the Group CFO of any violations or suspected violations of the provisions of this Policy, to allow for the necessary and appropriate checks and consequent action; this is without prejudice to the civil, administrative and criminal liability of the party violating such provisions.

The principles and rules set forth in this Policy are further detailed in the "Trade Compliance Handbook", implementation of which under the scope of routine corporate business is the responsibility of the Group Compliance & Rules Department. Where necessary, a similar document may also be fully or partially adopted on a local level, particularly with reference to those countries in which Pirelli operates that are subject to specific regulations governing sanctions and commercial restrictions.

June 2026

AUDIT, RISKS AND CORPORATE GOVERNANCE COMMITTEE

PIRELLI & C. S.P.A.