



RESPONSIBLE ARTIFICIAL INTELLIGENCE POLICY

The Pirelli Group (Pirelli & C. S.p.A. and its subsidiaries, hereinafter referred to as “Pirelli” or the “Group”) recognises the strategic importance of investments in the technological and digital sector. It is committed to adopting innovative technologies to constantly improve operational effectiveness and efficiency, while fostering new opportunities for growth and development. It also prioritises respecting the rights of third parties and individual rights and freedoms, which it sees as a fundamental value, essential to its corporate identity.

For this reason, the Group is committed to using Artificial Intelligence (hereinafter “AI”) in full compliance with EU Regulation 2024/1689¹ (known as the “Artificial Intelligence Act” or “AI Act”) where applicable under the same Regulation, as well as with any other locally applicable relevant legislation.

This Policy applies to all Pirelli Group activities involving the development by Pirelli or by third parties, on its behalf, or the use by Pirelli of its own or third-party Artificial Intelligence systems. All business partners (e.g. joint ventures, suppliers, etc.) are required to comply with the principles set out herein.

This Policy will be updated from time to time to reflect developments in regulations and new technologies and is intended to establish the core principles for the responsible management of AI.

The principles herein are transposed and set out in the Group’s corporate regulations, particularly concerning IT systems, IT security, business continuity, personal data protection, data governance and intellectual property.

KEY PRINCIPLES

In the context of the aforementioned development and use of AI systems, Pirelli (also in compliance with the provisions of the AI Act where applicable) is committed to assessing any risks associated with their development and use, and to adopting measures proportionate to the respective risk level.

With this in mind, the Group adopts a “Responsible AI” approach in accordance with the following principles:

- **Accountability:** Pirelli has established a governance framework that sets out the scope, roles and responsibilities of the departments that, in various capacities, are involved in the lifecycle of an AI system, as well as the boundaries and purposes of its use, in order to prevent misuse while at the same time promoting training and/or initiatives to raise awareness of the responsible use of AI systems.

¹ European Regulation (entered into force on 2 August 2024) establishing harmonised rules for the adoption of AI in the European Union. The objective of the Regulation is to create a uniform legal framework for the EU, with harmonised rules on AI, in order to facilitate its development, use and adoption in the internal market, while ensuring a high level of protection of public interests, such as health, safety and fundamental rights. The Regulation takes a risk-based approach and establishes appropriate safeguards based on the possible negative impact on individuals caused by using an AI system. The AI Act classifies AI systems as follows, based on their purpose of use:

- Prohibited Practices (see Article 5)
- High-risk AI systems (see Article 6 and Annexes I and III)
- Systems with Transparency Requirements - Limited Risk (Article 50)
- Not High Risk (by exclusion, these are the cases not covered by the previous classes)

- **Human oversight:** AI systems are designed to operate and produce outputs subject to human review and oversight. Each user shall act in accordance with this Policy and report any malfunctions or anomalies to those responsible for oversight, who are authorised to take appropriate action – including stopping the system – to ensure that AI systems do not make irreversible decisions that could cause harm, including to people's health, safety and fundamental rights.
- **Technical robustness and security:** AI systems ensure adequate levels of robustness and cybersecurity to thwart attempts to alter their use, and to minimise the possibility of intentional or unintentional harm.
- **Transparency:** AI systems intended to interact with natural persons shall be designed and developed in such a way that the individuals interacting with those systems are adequately informed about how they function, their capabilities and limitations, and are enabled to correctly interpret their output.
- **Non-discrimination and fairness:** AI systems are designed, developed and used inclusively, avoiding discriminatory effects and ensuring the fairness and impartiality of outcomes.
- **Privacy and data governance:** AI systems are designed in compliance with appropriate levels of data protection, including personal data protection, throughout the entire lifecycle of those systems, through effective data governance mechanisms that ensure the quality, integrity, confidentiality and lawful access to such data.
- **Safeguarding the environment:** Pirelli designs, develops and uses AI systems in line with its values and environmental protection objectives, which include, among other things, climate change mitigation, energy efficiency and the responsible use of resources, while monitoring their impact on the Group's sustainability objectives.
- **Social impact:** Pirelli, aware that AI systems may have a significant impact on people and society, encourages the use of such systems as tools made available to people with the ultimate aim of improving their wellbeing, while ensuring that individuals remain at the centre.
- **Performance measurement:** To ensure the effectiveness of its AI systems, Pirelli implements an approach to measuring and improving the performance of the AI systems.
- **Risk monitoring:** Pirelli assesses the risks associated with the use of AI systems, including the possibility that AI systems may be subject to cyber attacks, infringe third-party rights, including intellectual property rights and data protection rights, including personal data protection, and adopts the most appropriate strategies to mitigate any vulnerabilities in order to protect the integrity of people, data and systems throughout the relevant AI lifecycle.

GOVERNANCE AND DISCLOSURE

Pirelli's Top Management, supported by the Digital department and the relevant corporate departments, plays a strategic role in the full implementation of this Policy, ensuring the involvement of all Pirelli employees and collaborators so that they act in a manner consistent with the values set out in this Policy.

REPORTING, CONFIDENTIALITY, NON-RETALIATION AND CONSEQUENCES IN CASE OF VIOLATION

The Pirelli Group encourages the Recipients of this document to report in good faith, even anonymously, any act or omission by anyone at Pirelli, in relations with it or on its behalf, which constitutes or may constitute a violation, or inducement to violate the principles contained in this Policy. The [Whistleblowing Policy](#), published at www.pirelli.com in multiple languages, sets out the procedure for submitting reports, how they are managed and how confidentiality and non-retaliation are guaranteed.

Pirelli shall take appropriate action in the event of a breach of this Policy, whether it is discovered through the Whistleblowing Procedure or other means. Depending on the severity, this may include corrective action (including but not limited to: communicating with the offending employee, establishing a specific action plan with the relevant managers, etc.) and/or disciplinary actions (including but not limited to: verbal and/or written reprimands, negative performance reviews or termination), all in compliance with the applicable contractual, disciplinary, legal and regulatory system.

CORPORATE DOCUMENTATION REFERRED TO IN THIS POLICY

- [CODE OF ETHICS](#) and [CODE OF CONDUCT](#)
- [GLOBAL INFORMATION SECURITY POLICY](#)
- [GLOBAL PERSONAL DATA PROTECTION POLICY](#)
- [INTELLECTUAL PROPERTY POLICY](#)
- [GLOBAL HUMAN RIGHTS POLICY](#)
- [DIVERSITY, EQUITY & INCLUSION GLOBAL POLICY](#)
- [HEALTH, SAFETY AND ENVIRONMENT POLICY](#)
- [WHISTLEBLOWING POLICY](#)

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PIRELLI & C. S.p.A.
BOARD OF DIRECTORS