



Piaggio Group

Tax Strategy

(Updated 16/01/2026)

Tone at the top

The Piaggio Group (hereafter “Piaggio” or the “Group”) intends to manage tax matters within the framework outlined in this Tax Strategy document. This framework is based on the Code of Ethics, which defines the values and principles that Piaggio recognises, promotes and undertakes to respect and enforce in all areas, including taxation. This is because the Group recognises that it contributes to the needs and well-being of the communities in which it operates through taxation.

The Tax Strategy forms the cornerstone of the integrated system for identifying, measuring, managing and controlling tax risks. It is also a prerequisite for accessing the **collaborative compliance** regime with the Revenue Agency, pending the Risk and Sustainability Control Committee's approval. Approval of the strategy is granted by the Board of Directors of Piaggio & C. S.p.A., who also ensure its dissemination to all Group companies.

The Tax Strategy outlines the rules for managing Piaggio's tax affairs. It is divided into **Values**, **Principles** and **Guidelines**, and it incorporates the commitments set out in the Code of Conduct for taxpayers who adhere to collaborative compliance (MEF Decree of 29 April 2024).

This document, updated following organisational, regulatory and governance changes, fully replaces the previous document adopted by resolution of the Board of Directors of Piaggio & C. S.p.A. on 23 February 2024.

Values

Piaggio's tax management is carried out in accordance with the following values. These values must be respected by all corporate bodies, management, employees and external collaborators within the Group, as well as by all third parties.

Integrity

Piaggio is committed to maintaining and promoting the highest standards of integrity in tax compliance. This involves determining, paying and declaring taxes in accordance with the deadlines set in each jurisdiction and in compliance with the relevant legislation.

All Group companies primarily operate in the countries and markets in which they are established. The income taxed corresponds to the place where the value is produced, ensuring that the taxes due are paid in the correct jurisdiction.

Piaggio's internal control system is designed to ensure the integrity and accuracy of all business transaction records and reports, on which the relevant tax data is based.

Dismissing and condemning unlawful or improper behaviour

In order to achieve its economic objectives, the Company rejects and condemns the use of illegal or otherwise improper tax practices and undertakes to do whatever is necessary to prevent the organisation from being involved in tax fraud, including as a result of the conduct of third parties.

This commitment is given tangible form through the rigorous application of the Tax Strategy and the adoption of appropriate organisational and internal control structures.

Sustainable growth

In line with the objective of ensuring sustainable growth for the Group, aimed at creating lasting value over time – for customers, shareholders, employees and, in general, all stakeholders - the Piaggio Group intends to contribute to the economic well-being of the communities in which it operates, including through the management of the tax variable as a factor of sustainability, both because the taxes paid and collected represent a fundamental contribution to the public resources of the countries in which the Group operates and with a view to safeguarding the company's reputation over time.

Consequently, Piaggio does not engage in aggressive tax planning. Instead, the Group makes use of the tax incentives made available by the relevant tax regulations, adopting them in a manner that is consistent with the purpose and spirit of the laws.

Relationships with tax authorities

Piaggio maintains proactive relationships with tax authorities in all jurisdictions in which it operates. These relationships are based on full and effective cooperation, transparency and compliance with applicable laws, as well as the values and principles set out in this Tax Strategy.

Transparency

Acknowledging the social significance of tax matters and their role in fostering sustainable development, Piaggio is dedicated to disclosing fiscal information, encompassing public contributions and tax relief received. This transparent disclosure aims to illustrate to stakeholders the company's stance on tax-related issues and its contribution to public finances through taxes paid and collected. This approach aligns with the highest international standards for sustainability reporting.

Principles

In accordance with the values expressed in Piaggio's Code of Ethics, as referred to in the Tax Strategy, tax management is carried out in such a way as to fully implement the principles set out below.

Full compliance with applicable tax laws and regulations – fulfil tax payments, tax returns and any other tax obligations imposed by the relevant legislation correctly, accurately and promptly.

Sustainable taxation – ensuring ethical tax management to guarantee the Group's sustainable growth and create long-term value for stakeholders. This is achieved by applying legitimate and appropriate taxation. Piaggio recognises that its tax payments contribute to economic growth and strengthen social cohesion in the jurisdictions in which it operates. To this end, Piaggio discloses data relating to the breakdown by tax jurisdiction of the consolidated data required by international standards.

Tax risk management – minimising tax risk exposure and continuously implementing compliance controls to mitigate tax risk factors that may result in violations or abuse of the principles or objectives of applicable tax legislation.

Relationship with tax authorities – base relationships with tax authorities on transparency, good faith and loyal cooperation, with the aim of establishing prior consultation with all relevant institutions, ensuring certainty regarding the tax positions adopted and avoiding disputes.

Tax culture – promoting the Company's tax culture both internally and with third parties. This is inspired by the principles, values and guidelines on which the Piaggio Tax Strategy is based. The aim is to ensure the correct application of current tax legislation and appropriate sharing of the approach to taxation. This is achieved through training courses and information sessions for all employees, including those working outside the Legal and Tax department.

Guidelines

The Group's Tax Strategy is divided into the following guidelines that Piaggio intends to adopt in its daily tax practices in order to achieve the strategic objectives it has committed to pursuing.

Tax uncertainty

Piaggio always strives to reduce tax uncertainties and applies tax regulations in accordance with the letter, spirit and purpose of the provisions.

Where tax legislation is unclear or open to interpretation, Piaggio conducts an in-depth tax analysis to identify a reasonable interpretation based on the principle of legality. Where necessary, external consultants are brought in to support this process. The aim is to ensure that, in the event of a dispute, the position taken is the one most likely to be resolved in the Company's favour.

In this regard, and given its reduced appetite for risk, Piaggio is taking measures to avoid or reduce the risk of disputes with the tax authorities and any tax litigation. The Company acts with full transparency towards the tax authorities, working with them to achieve the most appropriate level of taxation using the tools made available by the legal system.

Agree to disagree

Following the audit and verification carried out by the competent tax authority, the Piaggio Group assesses whether to accept the findings and methodologies adopted in the relevant documents, with regard to the initiation of litigation or the adoption of dispute resolution instruments (e.g. Mutual Agreement Procedures).

In its own interest and that of its shareholders, Piaggio maintains the reasonableness and validity of its technical position in the event of tax disputes or differences of interpretation with the competent tax authorities.

Collaborative approach with tax authorities

The Group promotes the establishment of a collaborative, constructive and transparent dialogue with the tax authorities, based on the principles and values set out in this Tax Strategy. This includes adhering to the collaborative compliance regime to ensure the Piaggio Group obtains certainty in exchange for transparency.

The Legal and Tax department will handle requests and checks from the tax authorities, ensuring that the relevant information is collected for analysis by the public authorities.

In line with the relevant OECD Guidelines, Piaggio applies the provisions relating to documentation requirements set out in transfer pricing regulations to further improve transparency with the tax authorities.

Related-party transactions

Cross-border transactions between group companies are governed by the arm's length principle. This principle requires that transactions with related parties be conducted under conditions of free competition, as set out in the OECD Model Tax Convention on Income and Capital and the OECD Transfer Pricing Guidelines, which aim to prevent tax evasion and avoidance.

In relations with Group entities operating in countries or territories that do not adopt OECD rules, the transfer pricing policies adopted ensure consistency between the place where value is produced and the place where the related income components are taxed.

Aggressive tax planning

The Piaggio Group takes a rigorous, prudent and fair approach to economic decision-making. It does not engage in aggressive tax planning schemes involving the creation of artificial corporate structures for the purpose of obtaining undue tax advantages.

The Group has no entities located in non-cooperative countries for tax purposes or in countries considered by Italian tax legislation to have preferential tax regimes, unless this is required by unavoidable industrial or commercial needs. Where this occurs, the Parent Company adopts and complies with the relevant regimes provided for by international and domestic legislation (e.g. CFC rules, Pillar 2).

All tax incentives and concessions are used in full compliance with the rationale that drives individual countries to adopt them and, in any case, through a transparent approach. In fact, the tax variable exclusively supports industrial and commercial plans and objectives, and never represents their main or prevailing cause.

To eliminate or limit economic and legal double taxation, the Group applies the relevant international conventions on income and capital, as interpreted by the OECD, where permitted. These conventions are designed to prevent tax evasion and avoidance.

Internal controls on tax risks

In order to ensure sustainable growth, Piaggio is committed to adopting and maintaining adequate organisational structures, as well as an effective internal control system. This system is designed to identify, measure, manage and monitor the main business risks.

In this context, an integrated internal control system for the detection, measurement, management and control of tax risks has been adopted for the Group's most significant entities, including those arising from the application of accounting standards ("Integrated Group TCF"), in accordance with the OECD guidelines as implemented by the Revenue Agency in the collaborative compliance regime.

The Integrated Group TCF is divided into three lines of defence, pursuing the objective of ensuring adequate safeguards for the proper management of tax risk. This is understood in two senses: risk of non-compliance with regulations (i.e. compliance and tax fraud risk), and risk related to the interpretation of tax regulations (i.e. interpretative risk).

In the context of the Integrated Group TCF, the Board of Directors of Piaggio & C. S.p.A. defines the guidelines and governance of the control system in the Tax Compliance Model document. As the company that exercises management and coordination over the tax risk control system, it does so in line with this Tax Strategy, after consulting with the Risk and Sustainability Control Committee. It also periodically assesses the adequacy and effectiveness of the TCF itself and tax risk management, based on the report presented on the TCF. With regard to tax compliance, the report illustrates the checks carried out, the results obtained, the measures adopted to remedy any identified shortcomings, and the planned activities. The Board of Directors receives the report through the Risk Control and Sustainability Committee and takes note of it for subsequent assessment.

Furthermore, the Board of Directors defines the principles governing coordination and information flows between the various parties involved in the internal control system, including the Tax Control Framework, in order to maximise the system's efficiency, reduce duplication of activities, and ensure

the control body performs its tasks effectively. These principles are set out in the Tax Compliance Model document.

Piaggio's Internal Audit department acts as the third line of defence with regard to the Tax Control Framework. Its role is to periodically assess the adequacy of the risk control system in general, and the tax control system specifically, in terms of its design and effective functioning, through independent assessments.

In accordance with the principles of proportionality and materiality, as well as on the basis of appropriate organisational measures, the Integrated Group TCF may be gradually extended to other Group entities.

Whistleblowing

The Company is committed to fully implementing and maintaining a global whistleblowing policy. This policy provides anonymous channels, made available by Piaggio, to encourage reporting of any illegal or suspicious fiscal conduct, as well as communication of any fiscal issues. Reports may also be sent to the Supervisory Body referred to in the Organisation, Management and Control Model of Piaggio, via the designated channels. Through the establishment of mechanisms to protect whistleblowers, Piaggio does not tolerate any form of discrimination or retaliation against those who report issues in good faith.

Soft Controls

Aware of the importance of tax policy for the countries in which it operates, as well as the potential economic and reputational risks associated with incorrect tax management, Piaggio has established a Legal and Tax department at its Parent Company to coordinate global taxation.

Reporting to the Chief Executive Officer and under the supervision of the Board of Directors, the Legal and Tax department acts as an effective control point for identifying, managing and containing the risk of tax regulation violations or abuses. The department is also responsible for providing support, guidance and strategic coordination to subsidiaries.

The Legal and Tax department has a sufficient number of professionals who have the appropriate knowledge and experience of tax matters.

The Legal and Tax department is responsible for promoting a culture of tax compliance. This includes organising training initiatives for all employees, even those outside the department.

The remuneration policy for directors, members of the supervisory body and top management is designed to promote the Group's sustainable growth. Therefore, it does not include bonus schemes for top management that are linked to an excessive reduction in the tax burden.

Adoption and transposition

The Tax Strategy is prepared by Piaggio & C. S.p.A., acting as the parent company. Following the Risk Control and Sustainability Committee's review, the Board of Directors approves the strategy. The Board is ultimately responsible for its implementation, promoting a corporate culture based on its underlying values and overseeing the tax risk control system.

As part of the gradual extension of the Tax Control Framework, Group companies are adopting a tax strategy to raise awareness of, and promote compliance with, tax legislation and to encourage staff at all levels of the company to be aware of tax risks.

Following approval, the Tax Strategy is made available on the Group's institutional website.

Everyone who works at or collaborates with Piaggio is required to comply with the Tax Strategy. Any violation may result in sanctions under the company's disciplinary system, or termination of the contract for collaborators.

Interpretation of the Tax Strategy is the responsibility of the Parent Company's Legal And Tax department. This department reviews the strategy periodically and proposes any updates.