



# CERTIFICATIONS

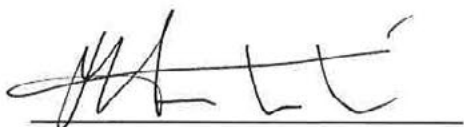
**CERTIFICATION OF THE CONSOLIDATED FINANCIAL STATEMENTS  
PURSUANT TO ARTICLE 154-BIS OF LEGISLATIVE DECREE 58 OF  
FEBRUARY 24, 1998, AND PURSUANT TO ARTICLE 81-TER OF CONSOB  
REGULATION NO. 11971 OF MAY 14, 1999, AS AMENDED**

1. The undersigned Marco Tronchetti Provera, in his capacity as Executive Vice Chairman and Chief Executive Officer, and Fabio Bocchio, in his capacity as Corporate Financial Reporting Manager of Pirelli & C. S.p.A. hereby certify pursuant to, *inter alia*, Article 154-bis, clauses 3 and 4, of Legislative Decree 58 of February 24, 1998:
  - a. the adequacy in relation to the characteristics of the company and
  - b. the effective application of the administrative and accounting procedures for preparation of the consolidated financial statements, during the period January 1, 2022 – December 31, 2022.
2. In this regard it should be noted that the adequacy of the administrative and accounting procedures for preparation of the consolidated financial statements for the year ended December 31, 2022 was determined on the basis of an assessment of the internal control system. This assessment was based on a specific process defined in accordance with the criteria laid down in the “Internal Control – Integrated Framework” guidelines issued by the “Committee of Sponsoring Organizations of the Treadway Commission” (COSO), which is a reference framework generally accepted at the international level.
3. We also certify that:
  - 3.1. the consolidated financial statements:
    - a. were prepared in accordance with the applicable international accounting standards recognised in the European Union under the terms of Regulation (EC) 1606/2002 of the European Parliament and Council, of July 19, 2002;
    - b. correspond to the information in the account ledgers and books;
    - c. give a true and fair view of the assets, liabilities, income, expenses and financial position of the reporting entity and of the Group of companies included in the scope of consolidation.

3.2. The report on operations includes a reliable analysis of the performance and results of operations, and of the situation of the reporting entity and of the Group of companies included in the scope of consolidation, together with a description of the principal risks and uncertainties to which they are exposed.

April 5, 2023

The Executive Vice Chairman and  
Chief Executive Officer

A handwritten signature in black ink, appearing to be 'MTP', written over a horizontal line.

(Marco Tronchetti Provera)

The Corporate Financial Reporting Manager

A handwritten signature in blue ink, appearing to be 'Fabio Bocchio', written over a horizontal line.

(Fabio Bocchio)



**PIRELLI & C SPA**

**INDEPENDENT AUDITOR'S REPORT IN ACCORDANCE  
WITH ARTICLE 14 OF LEGISLATIVE DECREE 39/2010 AND  
ARTICLE 10 OF REGULATION (EU) 537/2014**

**CONSOLIDATED FINANCIAL STATEMENTS AS OF 31 DECEMBER 2022**



## **Independent auditor's report**

*in accordance with article 14 of Legislative Decree 39/2010 and article 10 of Regulation (EU) 537/2014*

To the shareholders of Pirelli & C SpA

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### **Report on the Audit of the Consolidated Financial Statements**

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#### **Opinion**

We have audited the consolidated financial statements of Pirelli & C SpA and its subsidiaries (Pirelli group), which comprise the statement of financial position as of 31 December 2022, the income statement, the statement of comprehensive income, the statement of changes in equity and the statement of cash flows for the year then ended, and the notes to the consolidated financial statements, including a summary of significant accounting policies.

In our opinion, the consolidated financial statements give a true and fair view of the financial position of Pirelli group as of 31 December 2022, and of the result of its operations and cash flows for the year then ended in accordance with International Financial Reporting Standards as adopted by the European Union, and with the regulations issued to implement article 9 of Legislative Decree 38/2005.

#### **Basis for Opinion**

We conducted our audit in accordance with International Standards on Auditing (ISA Italia). Our responsibilities under those standards are further described in section Auditor's Responsibilities for the Audit of the Consolidated Financial Statements of this report. We are independent of Pirelli & C SpA (the Company) based on ethic and independence regulations and standards applicable to audits of financial statements under Italian law. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

#### **Key Audit Matters**

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the consolidated financial statements of the current period. These matters were addressed in the context of our audit of the consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

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#### **PricewaterhouseCoopers SpA**

Sede legale: **Milano** 20145 Piazza Tre Torri 2 Tel. 02 77851 Fax 02 7785240 Capitale Sociale Euro 6.890.000,00 i.v. C.F. e P.IVA e Reg. Imprese Milano Monza Brianza Lodi 12979880155 Iscritta al n° 119644 del Registro dei Revisori Legali - Altri Uffici: **Ancona** 60131 Via Sandro Totti 1 Tel. 071 2132311 - **Bari** 70122 Via Abate Gimma 72 Tel. 080 5640211 - **Bergamo** 24121 Largo Belotti 5 Tel. 035 229691 - **Bologna** 40126 Via Angelo Finelli 8 Tel. 051 6186211 - **Brescia** 25121 Viale Duca d'Aosta 28 Tel. 030 3697501 - **Catania** 95129 Corso Italia 302 Tel. 095 7532311 - **Firenze** 50121 Viale Gramsci 15 Tel. 055 2482811 - **Genova** 16121 Piazza Piccapietra 9 Tel. 010 29041 - **Napoli** 80121 Via dei Mille 16 Tel. 081 36181 - **Padova** 35138 Via Vicenza 4 Tel. 049 873481 - **Palermo** 90141 Via Marchese Ugo 60 Tel. 091 349737 - **Parma** 43121 Viale Tanara 20/A Tel. 0521 275911 - **Pescara** 65127 Piazza Ettore Troilo 8 Tel. 085 4545711 - **Roma** 00154 Largo Fochetti 29 Tel. 06 570251 - **Torino** 10122 Corso Palestro 10 Tel. 011 556771 - **Trento** 38122 Viale della Costituzione 33 Tel. 0461 237004 - **Treviso** 31100 Viale Felissent 90 Tel. 0422 696911 - **Trieste** 34125 Via Cesare Battisti 18 Tel. 040 3480781 - **Udine** 33100 Via Poscolle 43 Tel. 0432 25789 - **Varese** 21100 Via Albuzzi 43 Tel. 0332 285039 - **Verona** 37135 Via Francia 21/C Tel. 045 8263001 - **Vicenza** 36100 Piazza Pontelandolfo 9 Tel. 0444 393311

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**Key audit matter****Audit procedures to address the key audit matter**

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**Recoverability of brands with indefinite useful life and goodwill***Note 10 “Intangible assets”*

As of 31 December 2022 the indefinite-lived intangible assets Pirelli brand and goodwill amount to € 2,270 million and € 1,885 million, respectively.

Recoverability of the carrying amount of Pirelli brand and goodwill were tested for impairment at the year-end, in accordance with IAS36 – “Impairment of Assets”.

The recoverable amount of Pirelli brand is measured using its fair value less cost to sell, based on an income approach. This requires the use of estimates of future earnings attributable to the brand, net of the contribution assigned to the other operating assets (multi-period excess earnings method) and discount rate.

The recoverable amount of goodwill, entirely allocated to the the group of cash generating units (“CGU”) “Consumer segment”, which represents the sole sector of activity of Pirelli group, is measured using its value in use, calculated based on the expected future cash flows of the Consumer segment.

The recoverable amount of Pirelli Brand is compared with its carrying amount. The recoverable amount of the Consumer segment is compared with the carrying amount of segment assets and liabilities, including brand and goodwill.

Considering the magnitude of the carrying amounts and the subjective judgment in some of the assumptions used for the calculation of the recoverable amounts, the impairment test of the carrying amounts of Pirelli brand and goodwill represented a key matter in the audit of the consolidated financial statements.

We have performed an understanding and evaluation of the internal controls in place over the impairment testing of brand and goodwill.

We have tested the operating effectiveness of such controls.

We have performed, with the support of PwC experts, the following audit procedures:

- assessment over the adequacy of the impairment testing process in accordance with the requirement of the accounting standard;
- assessment of the key assumptions used when determining the fair value of Pirelli brand, with focus to future earnings attributable to the brand, net of the contribution assigned to the other operating assets (multi-period excess earnings method) and discount rate, including benchmarking and sensitivity analysis;
- assessment of the allocation of goodwill to CGUs;
- assessment of the key assumptions used when determining the value in use of the Consumer segment, to which the goodwill is allocated, with focus to expected cash flow projections and discount rate, including benchmarking e sensitivity analysis;
- testing of the accuracy of the carrying amounts of assets and liabilities directly attributable to the Consumer segment;
- testing the mathematical accuracy of the calculation model used;
- assessment of variances between projections used in previous years and actual results to evaluate reliability and coherence with market trends.

We have tested the accuracy and completeness of the disclosure presented in the notes to the consolidated financial statements.

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**Key audit matter**

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**Audit procedures to address the key audit matter**

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**Revenue recognition**

Note 3 “Adopted Accounting Standards”

The recognition of revenues, amounting to € 6,616 million in 2022, represented a key matter in the audit of the consolidated financial statements, also considering the magnitude and the high volume of sales transactions carried out through a global distribution network, different sales channels and logistic platforms.

We have carried out our procedures to verifying existence, completeness, accuracy and cut off of sales transactions.

We have performed, with the support of PwC specialists, the following audit procedures:

- for the main revenue streams identified using the requirements of IFRS15, we have performed an understanding and evaluation of the internal controls over the revenue recognition process and a validation of relevant controls;
- we have tested the proper recognition of revenue through testing samples of sales transactions, obtaining appropriate supporting evidence with specific attention to key contractual terms regulating the various performance obligations;
- we have performed external confirmation procedures over accounts receivable balances with the objective of validating trade receivable balances recorded in the consolidated accounts;
- we have tested samples of sales returns transactions, credit notes and year-end accruals.

We have tested the accuracy and completeness of the disclosure presented in the notes to the consolidated financial statements.



### ***Responsibilities of Management and Those Charged with Governance for the Consolidated Financial Statements***

Management is responsible for the preparation of consolidated financial statements that give a true and fair view in accordance with International Financial Reporting Standards as adopted by the European Union, and with the regulations issued to implement article 9 of Legislative Decree 38/2005 and, in the terms prescribed by law, for such internal control as management determines is necessary to enable the preparation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

Management is responsible for assessing the group ability to continue as a going concern and, in preparing the consolidated financial statements, for the appropriate application of the going concern basis of accounting, and for disclosing matters related to going concern. In preparing the consolidated financial statements, management uses the going concern basis of accounting unless management intends either to liquidate Pirelli & C SpA or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing, in the terms prescribed by law, the group financial reporting process.

### ***Auditor's Responsibilities for the Audit of the Consolidated Financial Statements***

Our objectives are to obtain reasonable assurance about whether the consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with International Standards on Auditing (ISA Italia) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the consolidated financial statements.

As part of an audit conducted in accordance with International Standards on Auditing (ISA Italia), we exercise professional judgment and maintain professional scepticism throughout the audit. Furthermore:

- we identify and assess the risks of material misstatement of the consolidated financial statements, whether due to fraud or error; we design and perform audit procedures responsive to those risks; we obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;



- we obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the group internal control;
- we evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management;
- we conclude on the appropriateness of management use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the group ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the group to cease to continue as a going concern;
- we evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation;
- we obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the group to express an opinion on the consolidated financial statements. We are responsible for the direction, supervision and performance of the group audit. We remain solely responsible for our audit opinion on the consolidated financial statements.

We communicate with those charged with governance, identified at an appropriate level as required by ISA Italia regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we complied with the regulations and standards on ethics and independence applicable under Italian law and communicate with them all relationships and other matters that may reasonably be thought to bear on our independence and, where applicable, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that are of most significance in the audit of the consolidated financial statements of the current period and are therefore the key audit matters. We describe these matters in our report.

***Additional Disclosures required by article 10 of Regulation (EU) 537/2014***

We were appointed by the shareholders of Pirelli & C SpA at the general meeting held on 1 August 2017 to perform the audit of the Company consolidated and separate financial statements for the years ending 31 December 2017 through 31 December 2025.



We declare that we did not provide any prohibited non-audit services referred to in article 5, paragraph 1, of Regulation (EU) 537/2014 and that we remained independent of the Company in conducting the audit.

We confirm that the opinion on the consolidated financial statements expressed in this report is consistent with the additional report to those charged with governance, in their capacity as audit committee, prepared in accordance with article 11 of the aforementioned Regulation.

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### ***Report on Compliance with other Laws and Regulations***

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#### ***Opinion on compliance with the provisions of Commission Delegated Regulation (EU) 815/2019***

Management of Pirelli & C SpA is responsible for the application of the provisions of the Commission Delegated Regulation (EU) 815/2019 concerning the regulatory technical standards for the specification of a single electronic reporting format ESEF – European Single Electronic Format (Commission Delegated Regulation) to the consolidated financial statements, to be included in the annual report.

We have performed the procedures required under auditing standard (SA Italia) 700B to express an opinion on the compliance of the consolidated financial statements with the provisions of the Commission Delegated Regulation.

In our opinion, the consolidated financial statements have been prepared in XHTML format and have been marked up, in all significant respects, in compliance with the provisions of the Commission Delegated Regulation.

Due to certain technical limitations, some information included in the notes to the consolidated financial statements when extracted from the XHTML format to an XBRL instance may not be reproduced in an identical manner with respect to the corresponding information presented in the consolidated financial statements in XHTML format.

#### ***Opinion in accordance with article 14, paragraph 2, letter e), of Legislative Decree 39/2010 and article 123-bis, paragraph 4, of Legislative Decree 58/1998***

Management of Pirelli & C SpA is responsible for preparing a report on operations and a report on the corporate governance and ownership structure of the Pirelli group as of 31 December 2022, including their consistency with the relevant consolidated financial statements and their compliance with the law.

We have performed the procedures required under auditing standard (SA Italia) 720B to express an opinion on the consistency of the report on operations and of the specific information included in the



report on corporate governance and ownership structure referred to in article 123-bis, paragraph 4, of Legislative Decree 58/1998 with the consolidated financial statements of the Pirelli group as of 31 December 2022 and on their compliance with the law, as well as to issue a statement on material misstatements, if any.

In our opinion, the report on operations and the specific information included in the report on corporate governance and ownership structure mentioned above are consistent with the consolidated financial statements of the Pirelli group as of 31 December 2022 and are prepared in compliance with the law.

With reference to the statement referred to in article 14, paragraph 2, letter e), of Legislative Decree 39/2010, issued on the basis of our knowledge and understanding of the group obtained in the course of the audit, we have nothing to report.

***Statement in accordance with article 4 of Consob Regulation implementing Legislative Decree 254/2016***

Management of Pirelli & C SpA is responsible for the preparation of the non-financial disclosure in accordance with Legislative Decree 254/2016. We have verified that the non-financial disclosure was approved by the board of directors.

In accordance with article 3, paragraph 10, of Legislative Decree 254/2016, the non-financial disclosure is subject to separate audit reporting by our firm.

Milan, 6 April 2023

PricewaterhouseCoopers SpA

*Signed by*

Paolo Caccini  
(Partner)

*This report has been translated into English from the Italian original solely for the convenience of international readers*

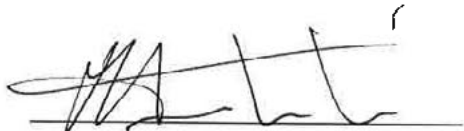
**CERTIFICATION OF THE SEPARATE FINANCIAL STATEMENTS  
PURSUANT TO ARTICLE 154-BIS OF LEGISLATIVE DECREE 58 OF  
FEBRUARY 24, 1998, AND PURSUANT TO ARTICLE 81-TER OF CONSOB  
REGULATION NO. 11971 OF MAY 14, 1999, AS AMENDED**

1. The undersigned Marco Tronchetti Provera, in his capacity as Executive Vice Chairman and Chief Executive Officer, and Fabio Bocchio, in his capacity as Corporate Financial Reporting Manager of Pirelli & C. S.p.A. hereby certify pursuant to, *inter alia*, Article 154-bis, clauses 3 and 4, of Legislative Decree 58 of February 24, 1998:
  - a. the adequacy in relation to the characteristics of the company and
  - b. the effective application of the administrative and accounting procedures for preparation of the separate financial statements, during the period January 1, 2022 – December 31, 2022.
2. In this regard it should be noted that the adequacy of the administrative and accounting procedures for preparation of the separate financial statements for the year ended December 31, 2022 was determined on the basis of an assessment of the internal control system. This assessment was based on a specific process defined in accordance with the criteria laid down in the “Internal Control – Integrated Framework” guidelines issued by the “Committee of Sponsoring Organizations of the Treadway Commission” (COSO), which is a reference framework generally accepted at the international level.
3. We also certify that:
  - 3.1. the separate financial statements:
    - a. were prepared in accordance with the applicable international accounting standards recognised in the European Union under the terms of Regulation (EC) 1606/2002 of the European Parliament and Council, of July 19, 2002;
    - b. correspond to the information in the account ledgers and books;
    - c. give a true and fair view of the assets, liabilities, income, expenses and financial position of the reporting entity and of the Group of companies included in the scope of consolidation.

3.2. The report on operations includes a reliable analysis of the performance and results of operations, and of the situation of the reporting entity, together with a description of the principal risks and uncertainties to which they are exposed.

April 5, 2023

The Executive Vice Chairman and  
Chief Executive Officer

A handwritten signature in black ink, consisting of stylized initials and a surname, written over a horizontal line.

(Marco Tronchetti Provera)

The Corporate Financial Reporting Manager

A handwritten signature in blue ink, consisting of a stylized first name and a surname, written over a horizontal line.

(Fabio Bocchio)



**PIRELLI & C SPA**

**INDEPENDENT AUDITOR'S REPORT IN ACCORDANCE  
WITH ARTICLE 14 OF LEGISLATIVE DECREE 39/2010 AND  
ARTICLE 10 OF REGULATION (EU) 537/2014**

**SEPARATE FINANCIAL STATEMENTS AS OF 31 DECEMBER 2022**



## **Independent auditor's report**

*in accordance with article 14 of Legislative Decree 39/2010 and article 10 of Regulation (EU) 537/2014*

To the shareholders of Pirelli & C SpA

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### **Report on the Audit of the Separate Financial Statements**

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#### **Opinion**

We have audited the separate financial statements of Pirelli & C SpA (the "Company"), which comprise the statement of financial position as of 31 December 2022, the income statement, the statement of comprehensive income, the statement of changes in equity and the statement of cash flows for the year then ended, and the notes to the separate financial statements, including a summary of significant accounting policies.

In our opinion, the separate financial statements give a true and fair view of the financial position of the Company as of 31 December 2022, and of the result of its operations and cash flows for the year then ended in accordance with International Financial Reporting Standards as adopted by the European Union, and with the regulations issued to implement article 9 of Legislative Decree 38/2005.

#### **Basis for Opinion**

We conducted our audit in accordance with International Standards on Auditing (ISA Italia). Our responsibilities under those standards are further described in section Auditor's Responsibilities for the Audit of the Separate Financial Statements of this report. We are independent of the Company based on ethic and independence regulations and standards applicable to audits of financial statements under Italian law. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

#### **Key Audit Matters**

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the separate financial statements of the current period. These matters were addressed in the context of our audit of the separate financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

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#### **PricewaterhouseCoopers SpA**

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**Key audit matter**

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**Audit procedures to address the key audit matter**

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**Recoverability of brands with indefinite useful life**

Note 9 “Intangible assets”

As of 31 December 2022 the indefinite-lived intangible asset Pirelli brand amounts to € 2,270 million.

Recoverability of the carrying amount of Pirelli brand was tested for impairment at the year-end, in accordance with IAS36 – “Impairment of Assets”.

The recoverable amount of Pirelli brand is measured using its fair value less cost to sell, based on an income approach. This requires the use of estimates of future earnings attributable to the brand, net of the contribution assigned to the other operating assets (multi-period excess earnings method) and discount rate.

The recoverable amount of Pirelli brand is compared with its carrying amount.

Considering the magnitude of the carrying amount and the subjective judgment in some of the assumptions used for the calculation of the fair value less cost to sell, the impairment test of Pirelli brand represented a key matter in the audit of the separate financial statements.

We have performed an understanding and evaluation of the internal controls in place over the impairment testing of the Pirelli brand. We have tested the operating effectiveness of such controls.

We have performed, with the support of PwC experts, the following audit procedures:

- assessment over the adequacy of the impairment testing process in accordance with the requirement of the accounting standard;
- assessment of the key assumptions used when determining the fair value of Pirelli brand, with focus to future earnings attributable to the brand, net of the contribution assigned to the other operating assets (multi-period excess earnings method) and discount rate, including benchmarking and sensitivity analysis;
- testing the mathematical accuracy of the calculation model used;
- assessment of variances between projections used in previous years and actual results to evaluate the reliability and coherence with market trends.

We have tested the accuracy and completeness of the disclosure presented in the notes to the separate financial statements.



### ***Responsibilities of Management and Those Charged with Governance for the Separate Financial Statements***

Management is responsible for the preparation of separate financial statements that give a true and fair view in accordance with International Financial Reporting Standards as adopted by the European Union, and with the regulations issued to implement article 9 of Legislative Decree 38/2005 and, in the terms prescribed by law, for such internal control as management determines is necessary to enable the preparation of separate financial statements that are free from material misstatement, whether due to fraud or error.

Management is responsible for assessing the Company ability to continue as a going concern and, in preparing the separate financial statements, for the appropriate application of the going concern basis of accounting, and for disclosing matters related to going concern. In preparing the separate financial statements, management uses the going concern basis of accounting unless management intends either to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing, in the terms prescribed by law, the Company financial reporting process.

### ***Auditor's Responsibilities for the Audit of the Separate Financial Statements***

Our objectives are to obtain reasonable assurance about whether the separate financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with International Standards on Auditing (ISA Italia) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the separate financial statements.

As part of an audit conducted in accordance with International Standards on Auditing (ISA Italia), we exercise professional judgment and maintain professional scepticism throughout the audit. Furthermore:

- we identify and assess the risks of material misstatement of the separate financial statements, whether due to fraud or error; we design and perform audit procedures responsive to those risks; we obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;
- we obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company internal control;



- we evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management;
- we conclude on the appropriateness of management use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the separate financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern;
- we evaluate the overall presentation, structure and content of the separate financial statements, including the disclosures, and whether the separate financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance, identified at an appropriate level as required by ISA Italia regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we complied with the regulations and standards on ethics and independence applicable under Italian law and communicate with them all relationships and other matters that may reasonably be thought to bear on our independence and, where applicable, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that are of most significance in the audit of the separate financial statements of the current period and are therefore the key audit matters. We describe these matters in our report.

***Additional Disclosures required by article 10 of Regulation (EU) 537/2014***

We were appointed by the shareholders of Pirelli & C SpA at the general meeting held on 1 August 2017 to perform the audit of the Company consolidated and separate financial statements for the years ending 31 December 2017 through 31 December 2025.

We declare that we did not provide any prohibited non-audit services referred to in article 5, paragraph 1, of Regulation (EU) 537/2014 and that we remained independent of the Company in conducting the audit.

We confirm that the opinion on the separate financial statements expressed in this report is consistent with the additional report to those charged with governance, in their capacity as audit committee, prepared in accordance with article 11 of the aforementioned Regulation.



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## ***Report on Compliance with other Laws and Regulations***

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### ***Opinion on compliance with the provisions of Commission Delegated Regulation (EU) 815/2019***

Management of Pirelli & C SpA is responsible for the application of the provisions of Commission Delegated Regulation (EU) 815/2019 concerning the regulatory technical standards for the specification of a single electronic reporting format ESEF - European Single Electronic Format (Commission Delegated Regulation) to the separate financial statements, to be included in the annual report.

We have performed the procedures required under auditing standard (SA Italia) 700B to express an opinion on the compliance of the separate financial statements with the provisions of the Commission Delegated Regulation.

In our opinion, the separate financial statements have been prepared in XHTML format in compliance with the provisions of the Commission Delegated Regulation.

### ***Opinion in accordance with article 14, paragraph 2, letter e), of Legislative Decree 39/2010 and article 123-bis, paragraph 4, of Legislative Decree 58/1998***

Management of Pirelli & C SpA is responsible for preparing a report on operations and a report on the corporate governance and ownership structure of Pirelli & C SpA as of 31 December 2022, including their consistency with the relevant separate financial statements and their compliance with the law.

We have performed the procedures required under auditing standard (SA Italia) 720B to express an opinion on the consistency of the report on operations and of the specific information included in the report on corporate governance and ownership structure referred to in article 123-bis, paragraph 4, of Legislative Decree 58/1998 with the separate financial statements of the Company as of 31 December 2022 and on their compliance with the law, as well as to issue a statement on material misstatement, if any.

In our opinion, the report on operations and the specific information included in the report on corporate governance and ownership structure mentioned above are consistent with the separate financial statements of the Company as of 31 December 2022 and are prepared in compliance with the law.



With reference to the statement referred to in article 14, paragraph 2, letter e), of Legislative Decree 39/2010, issued on the basis of our knowledge and understanding of the Company obtained in the course of the audit, we have nothing to report.

Milan, 6 April 2023

PricewaterhouseCoopers SpA

*Signed by*

Paolo Caccini  
(Partner)

*This report has been translated into English from the Italian original solely for the convenience of international readers*



GRI CONTENT INDEX

<b>STATEMENT OF USE</b>	Pirelli has reported in accordance with the GRI Standards for the period 01/01/2022 - 31/12/2022.
<b>GRI 1 USED</b>	GRI 1: Foundation 2021
<b>APPLICABLE GRI SECTOR STANDARD(S)</b>	NA

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	PAGE	OMISSION		
				REQUIREMENT(S) OMITTED	REASON	EXPLANATION

**GENERAL DISCLOSURES**

<b>GRI 2: GENERAL DISCLOSURES 2021</b>	2-1 Organizational details	Corporate website (www.pirelli.com) Pirelli and its Management Model Report on the Corporate Governance and Share Ownership of Pirelli & C SpA - Glossary Company Profile Significant shareholdings of capital Scope of consolidation - Companies consolidated line-by-line	Corporate website (www.pirelli.com) 99-100, 228-229, 229-230, 231, 416-421	A gray cell indicates that reasons for omission are not permitted for the disclosure or that a GRI Sector Standard reference number is not available.		
	2-2 Entities included in the organization's sustainability reporting	Methodological note Scope of Reporting Scope of consolidation - Companies consolidated line-by-line	98-99, 154, 416-421			
	2-3 Reporting period, frequency and contact point	Methodological note	98-99			
	2-4 Restatements of information	Methodological note	98-99			
	2-5 External assurance	Methodological note Independent auditor's report on the consolidated non-financial disclosure	98-99, 553-557			
	2-6 Activities, value chain and other business relationships	Corporate website (www.pirelli.com) Company Profile Pirelli and its Management Model Our customer Trend of Purchases	Corporate website (www.pirelli.com) 229-230, 99-100, 121-127, 137-139			
	2-7 Employees	Pirelli employees around the world Diversity, equity and inclusion	179-185, 185-190			
	2-8 Workers who are not employees	Pirelli employees around the world	179-185			
	2-9 Governance structure and composition	Model of Corporate Governance Role of the Board of Directors Functioning of Committees Pirelli and its Management Model Diversity Policies Diversity, equity and inclusion	230, 236, 246-247, 99-100, 240, 185-190			
	2-10 Nomination and selection of the highest governance body	Corporate website (www.pirelli.com) Pirelli and its Management Model Appointment and Replacement Induction Program	Corporate website (www.pirelli.com) 99-100, 236-237, 241			
	2-11 Chair of the highest governance body	Composition	237-239			
	2-12 Role of the highest governance body in overseeing the management of impacts	Pirelli and its Management Model Stakeholder Engagement Impact Materiality Sustainability of the Natural Rubber Supply Chain Policy on Conflict Minerals	99-100, 110, 101-108, 132-133, 134-136			
	2-13 Delegation of responsibility for managing impacts	Pirelli and its Management Model Impact Materiality	99-100, 101-108			

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	PAGE	OMISSION		
				REQUIREMENT(S) OMITTED	REASON	EXPLANATION
<b>GRI 2: GENERAL DISCLOSURES 2021</b>	2-14 Role of the highest governance body in sustainability reporting	Pirelli and its Management Model Impact Materiality Role of the Board of Directors	99-100, 101-108, 236			
	2-15 Conflicts of interest	Interests of the Directors and related-party transactions	257			
	2-16 Communication of critical concerns	System of Internal Control And Risk Management - Audit, Risks, Sustainability And Corporate Governance Committee	252		Confidentiality constraints	Pirelli do not disclose this information for Business related constraints
	2-17 Collective knowledge of the highest governance body	Corporate website (www.pirelli.com) Pirelli and its Management Model Induction Program	Corporate website (www.pirelli.com) 99-100, 241			
	2-18 Evaluation of the performance of the highest governance body	Board of Directors Self-Assessment Process	242-243			
	2-19 Remuneration policies	Remuneration Policy For The 2023 Financial Year Elements of the 2023 Policy Compensation in the event of resignation, dismissal or termination of relations Clawback Clauses Office Termination Payment and non-monetary benefits Diversity, equity and inclusion Remuneration and Sustainability	283-286, 288, 302-303, 302, 298, 185-190, 190-191			
	2-20 Process to determine remuneration	Report on the Remuneration Policy and Compensation Paid Remuneration Policy For The 2023 Financial Year	279-282, 283-286			
	2-21 Annual total compensation ratio	NA		a;b;c	Confidentiality constraints	Pirelli do not disclose this information for Business related constraints
	2-22 Statement on sustainable development strategy	Corporate website (www.pirelli.com) Sustainability Area/ Pirelli's Model	Corporate website (www.pirelli.com)			
	2-23 Policy commitments	Main Policies Compliance Programmes, Anti-Corruption, Privacy, Trade Compliance, Antitrust, Compliance with Laws And Regulations Supply Chain Sustainable Management System Policy on Conflict Minerals Respect for Human Rights Diversity, equity and inclusion Training on Sustainability and Corporate Governance	110-111, 111-112, 127-128, 134-136, 176-177, 185-190, 194			
	2-24 Embedding policy commitments	Sustainability of the Natural Rubber Supply Chain The "Green Sourcing" Policy Supplier award Respect for Human Rights	132-133, 134, 137, 176-177			
	2-25 Processes to remediate negative impacts	Grievance Mechanism - Natural Rubber Materiality of ESG Impacts on the Supply Chain Sustainability of the Natural Rubber Supply Chain Focus: Reporting Procedure - Whistleblowing Policy Diversity, equity and inclusion	115, 131, 132-133, 113-115, 185-190			
	2-26 Mechanisms for seeking advice and raising concerns	Focus: Reporting Procedure - Whistleblowing Policy	113-115			



GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	PAGE	OMISSION		
				REQUIREMENT(S) OMITTED	REASON	EXPLANATION
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	2-28 Membership associations	Main International Commitments for Sustainability Contributions for the benefit of the External Community Respect for Human Rights Tyre Wear and TRWP	210-219, 116-117, 176-177, 152-153			
	2-29 Approach to stakeholder engagement	Stakeholder engagement Policy for managing dialogue with Shareholders and the main Financial Market Stakeholders	110, 260			
	2-30 Collective bargaining agreements	Industrial Relations Unionisation Levels and Industrial Action	198-200, 199			
<b>MATERIAL TOPICS</b>						
<b>GRI 3: MATERIAL TOPICS 2021</b>	3-1 Process to determine material topics	Methodological note	98-99	A gray cell indicates that reasons for omission are not permitted for the disclosure or that a GRI Sector Standard reference number is not available.		
	3-2 List of material topics	Methodological note	98-99			
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<b>GRI 3: MATERIAL TOPICS 2021</b>	3-3 Management of material topics	Presentation of 2022 integrated Annual Report Sharing of Added Value Relations with Investors and the Financial Market Consolidated Financial Statements at December 31, 2022	56-57, 116-117, 118-119, 325-424			
<b>GRI 201: ECONOMIC PERFORMANCE 2016</b>	201-1 Direct economic value generated and distributed	Sharing of Added Value Relations with Investors and the Financial Market Consolidated Financial Statements at December 31, 2022	116-117, 118-119, 325-424			
	201-2 Financial implications and other risks and opportunities due to climate change	Risk factors and uncertainty Emerging risks related to Climate Change and Water Stress Joining the Task Force on Climate-Related Financial Disclosures (TCFD) Management of Greenhouse Gas Emissions and Carbon Action Plan	83-90, 89, 141-143, 156-158			
	201-3 Defined benefit plan obligations and other retirement plans	Supplementary Pension Plans, Supplementary Health Plans and other Social Benefits Employee Benefit Obligations Personnel Costs	199-200, 462-463, 468			
	201-4 Financial assistance received from government	Loans and Contributions received from the Public Administration	118			
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<b>GRI 3: MATERIAL TOPICS 2021</b>	3-3 Management of material topics	Diversity, equity and inclusion Focus: The Figures on Diversity	185-190, 186-187			
<b>GRI 202: MARKET PRESENCE 2016</b>	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	Diversity, equity and inclusion	185-190			
	202-2 Proportion of senior management hired from the local community	Diversity, equity and inclusion Focus: The Figures on Diversity	185-190, 186-187			

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	PAGE	OMISSION		
				REQUIREMENT(S) OMITTED	REASON	EXPLANATION
<b>CORPORATE CITIZENSHIP</b>						
<b>GRI 3: MATERIAL TOPICS 2021</b>	3-3 Management of material topics	Sharing of Added Value Company initiatives for the external community	116-117, 215-219			
<b>GRI 203: INDIRECT ECONOMIC IMPACTS 2016</b>	203-1 Infrastructure investments and services supported	Sharing of Added Value Company initiatives for the external community Fondazione Pirelli Pirelli Hangar Bicocca	116-117, 215-219, 219-220, 221-224			
	203-2 Significant indirect economic impacts	Sharing of Added Value Company initiatives for the external community Fondazione Pirelli Pirelli Hangar Bicocca	116-117, 215-219, 219-220, 221-224			
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<b>GRI 3: MATERIAL TOPICS 2021</b>	3-3 Management of material topics	Our Suppliers	127-139			
<b>GRI 204: PROCUREMENT PRACTICES 2016</b>	204-1 Proportion of spending on local suppliers	Trend of Purchases	137-139			
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<b>GRI 3: MATERIAL TOPICS 2021</b>	3-3 Management of material topics	Pirelli and its Management Model Main Policies Compliance Programmes, Anti-Corruption, Privacy, Trade Compliance, Antitrust, Compliance with Laws And Regulations Focus: Reporting Procedure - Whistleblowing Policy Respect for Human Rights	99-100, 110-111, 111-112, 113-115, 176-177			
<b>GRI 205: ANTI-CORRUPTION 2016</b>	205-1 Operations assessed for risks related to corruption	Focus: Reporting Procedure - Whistleblowing Policy	113-115			
	205-2 Communication and training about anti-corruption policies and procedures	Main Policies Compliance Programmes, Anti-Corruption, Privacy, Trade Compliance, Antitrust, Compliance with Laws And Regulations Induction Program	110-111, 111-112, 241		Information unavailable/ incomplete	% of employees trained on anti-corruption currently not disclosed by category and region
	205-3 Confirmed incidents of corruption and actions taken	Compliance Programmes, Anti-Corruption, Privacy, Trade Compliance, Antitrust, Compliance with Laws And Regulations Focus: Reporting Procedure - Whistleblowing Policy	111-112, 114-115			
<b>BUSINESS ETHICS &amp; INTEGRITY</b>						
<b>GRI 3: MATERIAL TOPICS 2021</b>	3-3 Management of material topics	Pirelli and its Management Model Main Policies Compliance Programmes, Anti-Corruption, Privacy, Trade Compliance, Antitrust, Compliance with Laws And Regulations Focus: Reporting Procedure - Whistleblowing Policy Respect for Human Rights	99-100, 110-111, 111-112, 114-115, 176-177			
<b>GRI 206: ANTI-COMPETITIVE BEHAVIOR 2016</b>	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Compliance Programmes, Anti-Corruption, Privacy, Trade Compliance, Antitrust, Compliance with Laws And Regulations	111-112			

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	PAGE	OMISSION		
				REQUIREMENT(S) OMITTED	REASON	EXPLANATION
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<b>GRI 207: TAX 2019</b>	207-1 Approach to tax	Taxes	401-403			
	207-2 Tax governance, control, and risk management	Taxes	401-403			
	207-3 Stakeholder engagement and management of concerns related to tax	Taxes	401-403			
	207-4 Country-by-country reporting				Information unavailable/incomplete	information provided by Region
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<b>GRI 3: MATERIAL TOPICS 2021</b>	3-3 Management of material topics	Product Safety, Performance and Eco-Sustainability Product: Research and Development of Raw Materials Product: Eco & Safety Performance Targets Tyre Wear and TRWP Management of End-of-Life Tyres Pirelli's approach to the Circular Economy: the 5 Rs	123-125, 148-149, 149-152, 152-153, 153, 148			
<b>GRI 301: MATERIALS 2016</b>	301-1 Materials used by weight or volume	Product: Research and Development of Raw Materials	148-149			
	301-2 Recycled input materials used	Product: Research and Development of Raw Materials	148-149			
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	302-2 Energy consumption outside of the organization	The Pirelli Group Environmental Strategy and Footprint	144-147			
	302-3 Energy intensity	Energy Management	154-156			
	302-4 Reduction of energy consumption	Energy Management	154-156			
	302-5 Reductions in energy requirements of products and services	Product: Eco & Safety Performance Targets	149-152			

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	PAGE	OMISSION		
				REQUIREMENT(S) OMITTED	REASON	EXPLANATION
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<b>GRI 3: MATERIAL TOPICS 2021</b>	3-3 Management of material topics	Sustainability of the Natural Rubber Supply Chain Biodiversity Pirelli's approach to the Circular Economy: the 5 Rs Product: Research and Development of Raw Materials Water Management	132-133, 143-144, 148, 148-149, 161-163			
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	303-2 Management of water discharge-related impacts	Water Management	161-163			
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<b>GRI 304: BIODIVERSITY 2016</b>	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Biodiversity	143-144			
	304-2 Significant impacts of activities, products and services on biodiversity	Biodiversity Water Management	143-144, 161-163			
	304-3 Habitats protected or restored	Management of Greenhouse Gas Emissions and Carbon Action Plan Biodiversity	156-158, 143-144			
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	Biodiversity	143-144			

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	PAGE	OMISSION		
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<b>CLIMATE CHANGE AND GREENHOUSE GAS EMISSIONS REDUCTION</b>						
<b>GRI 3: MATERIAL TOPICS 2021</b>	3-3 Management of material topics	Joining the Task Force on Climate-Related Financial Disclosures (TCFD) The Pirelli Group Environmental Strategy and Footprint Energy Management Management of Greenhouse Gas Emissions and Carbon Action Plan	141-143, 144-147, 154-156, 156-158			
<b>GRI 305: EMISSIONS 2016</b>	305-1 Direct (Scope 1) GHG emissions	Scope of Reporting Management of Greenhouse Gas Emissions and Carbon Action Plan	154, 156-158			
	305-2 Energy indirect (Scope 2) GHG emissions	Scope of Reporting Management of Greenhouse Gas Emissions and Carbon Action Plan	154, 156-158			
	305-3 Other indirect (Scope 3) GHG emissions	CDP supply chain Environmental Dimension The Pirelli Group Environmental Strategy and Footprint Management of Greenhouse Gas Emissions and Carbon Action Plan	136, 140-175, 144-147, 156-158			
	305-4 GHG emissions intensity	Management of Greenhouse Gas Emissions and Carbon Action Plan	156-158			
	305-5 Reduction of GHG emissions	Management of Greenhouse Gas Emissions and Carbon Action Plan	156-158			
	305-6 Emissions of ozone-depleting substances (ODS)	Other Emissions and Environmental Aspects	166			
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<b>GRI 306: WASTE 2020</b>	306-1 Waste generation and significant waste-related impacts	The Pirelli Group Environmental Strategy and Footprint Waste Management	144-147, 163-165			
	306-2 Management of significant waste-related impacts	Pirelli's approach to the Circular Economy: the 5 Rs Waste Management Other Emissions and Environmental Aspects	148, 163-165, 166			
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	306-5 Waste directed to disposal	Waste Management	163-165			
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<b>GRI 308: SUPPLIER ENVIRONMENTAL ASSESSMENT 2016</b>	308-1 New suppliers that were screened using environmental criteria	The ESG Elements in the Procurement Process Focus: ESG On-Site Audits	128-129, 129-131			
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	401-3 Parental leave	Diversity, equity and inclusion	185-190			
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<b>GRI 403: OCCUPATIONAL HEALTH AND SAFETY 2018</b>	403-1 Occupational health and safety management system	Model Management System	200, 201-202			
	403-2 Hazard identification, risk assessment, and incident investigation	Safety Culture and Training Monitoring of Health and Safety Performance and Main Indicators	202-203, 203-207			
	403-3 Occupational health services	Safety Culture and Training Monitoring of Health and Safety Performance and Main Indicators	202-203, 203-207			
	403-4 Worker participation, consultation, and communication on occupational health and safety	Model Management System	200, 201-202			
	403-5 Worker training on occupational health and safety	Safety Culture and Training	202-203			
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	403-8 Workers covered by an occupational health and safety management system	Model Management System	200, 201-202	a. iii	Information unavailable/incomplete	number of contractors not available
	403-9 Work-related injuries	Monitoring of Health and Safety Performance and Main Indicators	203-207	a. v, b. v	Confidentiality Constraints	Pirelli do not disclose this information for Business related constraints
	403-10 Work-related ill health	Monitoring of Health and Safety Performance and Main Indicators	203-207			

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	PAGE	OMISSION		
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	404-2 Programs for upgrading employee skills and transition assistance programs	Talent Development Training	192, 195			
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<b>DIVERSITY, EQUITY AND INCLUSION &amp; HUMAN RIGHTS</b>						
<b>GRI 3: MATERIAL TOPICS 2021</b>	3-3 Management of material topics	Impact Materiality Diversity, equity and inclusion Main Policies Respect for Human Rights Our Suppliers Compliance with Legislative- Contractual Requirements on Overtime, Rest Periods, Association and Bargaining, Equal Opportunities and Non- Discrimination, Prohibition of Child and Forced Labour	101-108, 185-190, 110-111, 176-177, 127-139, 198-199			
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GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	PAGE	OMISSION		
				REQUIREMENT(S) OMITTED	REASON	EXPLANATION
<b>HUMAN RIGHTS &amp; RESPONSIBLE MANAGEMENT OF THE SUPPLY CHAIN</b>						
<b>GRI 3: MATERIAL TOPICS 2021</b>	3-3 Management of material topics	Main Policies Respect for Human Rights Diversity, equity and inclusion Our Suppliers Compliance with Legislative- Contractual Requirements on Overtime, Rest Periods, Association and Bargaining, Equal Opportunities and Non- Discrimination, Prohibition of Child and Forced Labour	110-111, 176-177, 185-190, 127-139, 198-199			
<b>GRI 407: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING 2016</b>	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	The ESG Elements in the Procurement Process Focus: ESG On-Site Audits Respect for Human Rights Compliance with Legislative- Contractual Requirements on Overtime, Rest Periods, Association and Bargaining, Equal Opportunities and Non- Discrimination, Prohibition of Child and Forced Labour	128-129, 129-131, 176-177, 198-199			
<b>HUMAN RIGHTS &amp; RESPONSIBLE MANAGEMENT OF THE SUPPLY CHAIN</b>						
<b>GRI 3: MATERIAL TOPICS 2021</b>	3-3 Management of material topics	Main Policies Respect for Human Rights Diversity, equity and inclusion Our Suppliers Compliance with Legislative- Contractual Requirements on Overtime, Rest Periods, Association and Bargaining, Equal Opportunities and Non- Discrimination, Prohibition of Child and Forced Labour	110-111, 176-177, 185-190, 127-139, 198-199			
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<b>HUMAN RIGHTS &amp; RESPONSIBLE MANAGEMENT OF THE SUPPLY CHAIN</b>						
<b>GRI 3: MATERIAL TOPICS 2021</b>	3-3 Management of material topics	Main Policies Respect for Human Rights Diversity, equity and inclusion Our Suppliers Compliance with Legislative- Contractual Requirements on Overtime, Rest Periods, Association and Bargaining, Equal Opportunities and Non- Discrimination, Prohibition of Child and Forced Labour	110-111, 176-177, 185-190, 127-139, 198-199			
<b>GRI 409: FORCED OR COMPULSORY LABOR 2016</b>	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	The ESG Elements in the Procurement Process Focus: ESG On-Site Audits Respect for Human Rights Compliance with Legislative- Contractual Requirements on Overtime, Rest Periods, Association and Bargaining, Equal Opportunities and Non- Discrimination, Prohibition of Child and Forced Labour	128-129, 129-131, 176-177, 198-199			
<b>GRI 410: SECURITY PRACTICES 2016</b>	410-1 Security personnel trained in human rights policies or procedures				Information unavailable/incomplete	% of security personnel trained on human rights currently not available



GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	PAGE	OMISSION		
				REQUIREMENT(S) OMITTED	REASON	EXPLANATION
<b>HUMAN RIGHTS</b>						
<b>GRI 3: MATERIAL TOPICS 2021</b>	3-3 Management of material topics	Main Policies Respect for Human Rights Diversity, equity and inclusion Our Suppliers Compliance with Legislative- Contractual Requirements on Overtime, Rest Periods, Association and Bargaining, Equal Opportunities and Non- Discrimination, Prohibition of Child and Forced Labour	110-111, 176-177, 185-190, 127-139, 198-199			
<b>GRI 411: RIGHTS OF INDIGENOUS PEOPLES 2016</b>	411-1 Incidents of violations involving rights of indigenous peoples	Focus: Reporting Procedure - Whistleblowing Policy	113-115			
<b>CORPORATE CITIZENSHIP</b>						
<b>GRI 3: MATERIAL TOPICS 2021</b>	3-3 Management of material topics	Sharing of Added Value Company initiatives for the external community	116-117, 215-219			
<b>GRI 413: LOCAL COMMUNITIES 2016</b>	413-1 Operations with local community engagement, impact assessments, and development programs	Stakeholder engagement Respect for Human Rights Sustainability of the Natural Rubber Supply Chain Water Management Compliance with Legislative- Contractual Requirements on Overtime, Rest Periods, Association and Bargaining, Equal Opportunities and Non- Discrimination, Prohibition of Child and Forced Labour Biodiversity, The Pirelli Group Environmental Strategy and Footprint External Community, Company initiatives for the external community	110, 176-177, 132-133, 161-163, 198-199, 143-144, 144-147, 208-215, 215-219		Information unavailable/ incomplete	information currently unavailable
	413-2 Operations with significant actual and potential negative impacts on local communities	Respect for Human Rights Sustainability of the Natural Rubber Supply Chain, Biodiversity, The Pirelli Group Environmental Strategy and Footprint, Water Management, External Community, Company initiatives for the external community	176-177, 132-133, 143-144, 144-147, 161-163, 208-215, 215-219			
<b>RESPONSIBLE MANAGEMENT OF THE SUPPLY CHAIN</b>						
<b>GRI 3: MATERIAL TOPICS 2021</b>	3-3 Management of material topics	Our Suppliers Respect for Human Rights Policy on Conflict Minerals	127-139, 176-177, 134-136			
<b>GRI 414: SUPPLIER SOCIAL ASSESSMENT 2016</b>	414-1 New suppliers that were screened using social criteria	The ESG Elements in the Procurement Process Focus: ESG On-Site Audits	128-129, 129-131			
	414-2 Negative social impacts in the supply chain and actions taken	Risk factors and uncertainty Focus: ESG On-Site Audits	83-90, 129-131			
<b>GRI 415: PUBLIC POLICY 2016</b>	415-1 Political contributions	Contributions for the benefit of the External Community	116-117			

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	PAGE	OMISSION		
				REQUIREMENT(S) OMITTED	REASON	EXPLANATION
<b>BUSINESS ETHICS AND INTEGRITY &amp; PRODUCT QUALITY AND SAFETY</b>						
<b>GRI 3: MATERIAL TOPICS 2021</b>	3-3 Management of material topics	Product Safety, Performance and Eco-Sustainability Product: Research and Development of Raw Materials Product: Eco & Safety Performance Targets Tyre Wear and TRWP Management of End-of-Life Tyres Pirelli and its Management Model Main Policies Compliance Programmes, Anti-Corruption, Privacy, Trade Compliance, Antitrust, Compliance with Laws And Regulations Compliance Focus: Reporting Procedure - Whistleblowing Policy	123-125, 148-149, 149-152, 152-153, 153, 99-100, 110-111, 111-112, 127, 113-115			
<b>GRI 416: CUSTOMER HEALTH AND SAFETY 2016</b>	416-1 Assessment of the health and safety impacts of product and service categories	Product Safety, Performance and Eco-Sustainability The ESG Elements in the Procurement Process	123-125, 128-129			
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	Compliance	127			
<b>GRI 417: MARKETING AND LABELING 2016</b>	417-1 Requirements for product and service information and labeling	Transparency, Information and Customer Training Quality and Product Certification Product: Eco & Safety Performance Targets Management of End-of-Life Tyres Product: Research and Development of Raw Materials	121-122, 126-127, 149-152, 153, 148-149			
	417-2 Incidents of non-compliance concerning product and service information and labeling	Compliance	127			
	417-3 Incidents of non-compliance concerning marketing communications	Compliance	127			
<b>CYBERSECURITY</b>						
<b>GRI 3: MATERIAL TOPICS 2021</b>	3-3 Management of material topics	Information and Cyber Security	112-113			
<b>GRI 418: CUSTOMER PRIVACY 2016</b>	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Compliance Programmes, Anti-Corruption, Privacy, Trade Compliance, Antitrust, Compliance with Laws And Regulations	111-112			

SASB CONTENT INDEX  
 SUSTAINABILITY ACCOUNTING STANDARDS BOARD (SASB) - AUTO PARTS

TOPIC	ACCOUNTING METRIC	PAGE NUMBER	SASB CODE
Energy Management	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable	154-156	TR-AP-130a.1
Waste Management	(1) Total amount of waste from manufacturing, (2) percentage hazardous, (3) percentage recycled	163-165	TR-AP-150a.1
Product Safety	Number of recalls issued, total units recalled	127	TR-AP-250a.1.
Design for Fuel Efficiency	Revenue from products designed to increase fuel efficiency and/or reduce emissions	56	TR-AP-410a.1.
Materials Sourcing	Description of the management of risks associated with the use of critical materials	134-136	TR-AP-440a.1.
Materials Efficiency	Percentage of products sold that are recyclable	153	TR-AP-440b.1.
	Percentage of input materials from recycled or remanufactured content	158	TR-AP-440b.2.
Competitive Behavior	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulations	112	TR-AP-520a.1.

ACTIVITY METRICS	PAGE NUMBER	SASB CODE
Number of parts produced	NA	TR-AP-000.A
Weight of parts produced	154	TR-AP-000.B
Area of manufacturing plants	56	TR-AP-000.C

UNGC PRINCIPLES SUMMARY TABLE

AREAS OF THE GLOBAL COMPACT	GLOBAL COMPACT PRINCIPLES	DIRECTLY RELEVANT GRI INDICATORS	INDIRECTLY RELEVANT GRI INDICATORS
HUMAN RIGHTS	<b>Principle 1</b> – Business should promote and respect internationally proclaimed human rights in their respective spheres of influence.	Disclosure 407: Freedom of Association and Collective Bargaining Disclosure 408: Child Labor Disclosure 409: Forced or Compulsory Labor Disclosure 410: Security Practices Disclosure 411: Rights of Indigenous Peoples Disclosure 414: Supplier Social Assessment Disclosure 2-25: Processes to remediate negative impacts	Disclosure 413: Local Communities
	<b>Principle 2</b> – Business should ensure that they are not, albeit indirectly, complicit in human rights abuses.	Disclosure 410: Security Practices Disclosure 414: Supplier Social Assessment	
LABOUR STANDARDS	<b>Principle 3</b> – Businesses should uphold the freedom of association of workers and recognise the right to collective bargaining.	Disclosure 402: Labour/Management Relations Disclosure 403: Occupational Health and Safety Disclosure 407: Freedom of Association and Collective Bargaining Disclosure 410: Security Practices Disclosure 2-23: Policy commitments Disclosure 2-30: Collective Bargaining Agreements	
	<b>Principle 4</b> – Business should uphold the elimination of all forms of forced and compulsory labour.	Disclosure 409: Forced or Compulsory Labor Disclosure 410: Security Practices	
	<b>Principle 5</b> – Business should uphold the effective elimination of child labour.	Disclosure 408: Child Labor Disclosure 410: Security Practices	
	<b>Principle 6</b> – Business should uphold the elimination of discrimination in respect of employment and occupation.	Disclosure 401: Employment Disclosure 404: Training and Education Disclosure 405: Diversity and Equal Opportunity Disclosure 406: Non-Discrimination Disclosure 410: Security Practices Disclosure 2-7: Employees	Disclosure 202: Market Presence Disclosure 401: Employment Disclosure 414: Supplier Social Assessment Disclosure 2-30: Collective Bargaining Agreements
ENVIRONMENT	<b>Principle 7</b> – Businesses should support a precautionary approach to environmental challenges.	Disclosure 2-23: Policy commitments Disclosure 201: Economic Performance	Disclosure 301: Materials Disclosure 302: Energy Disclosure 303: Water and Effluents Disclosure 304: Biodiversity Disclosure 305: Emissions Disclosure 306: Effluents and Waste Disclosure 307: Environmental Compliance
	<b>Principle 8</b> – Business should undertake initiatives to promote greater environmental responsibility.	Disclosure 301: Materials Disclosure 302: Energy Disclosure 303: Water and Effluents Disclosure 304: Biodiversity Disclosure 305: Emissions Disclosure 306: Effluents and Waste Disclosure 308: Supplier Environmental Assessment Disclosure 2-25: Processes to remediate negative impacts	Disclosure 201: Economic Performance
	<b>Principle 9</b> – Businesses should encourage the development and diffusion of environmentally friendly technologies.	Disclosure 301: Materials Disclosure 302: Energy Disclosure 303: Water and Effluents Disclosure 305: Emissions	
ANTI-CORRUPTION	<b>Principle 10</b> – Businesses should work against corruption in all its forms, including extortion and bribery.	Disclosure 205: Anti-Corruption Disclosure 2-23: Policy Commitments Disclosure 2-26: Mechanism for seeking Advice and raising Concerns	Disclosure 205: Anti-Corruption Disclosure 2-23: Policy Commitments Disclosure 2-26: Mechanism for seeking Advice and raising Concerns

SDGs SUMMARY TABLE

SUSTAINABLE DEVELOPMENT GOALS (SDGs)	PARAGRAPHS DESCRIBING THE GROUP'S ACTIVITIES IN SUPPORT OF THE SDGs AND RELEVANT TARGETS (FROM SUSTAINABILITY PLAN 2025-2030)
<b>1 - NO POVERTY</b>	Company Initiatives for the External Community (Social Solidarity pp. 217-218)
<b>2 - ZERO HUNGER</b>	Company Initiatives for the External Community (Social Solidarity pp. 217-218)
<b>3 - GOOD HEALTH AND WELL-BEING</b>	Welfare and Initiatives for the Internal Community (pp. 197-198) Occupational Health, Safety and Hygiene (pp. 200-207) Company Initiatives for the External Community (Road Safety pp. 215-216, Sport and Inclusion pp. 217, Health p. 218)  Target: → Accident Frequency Index: ≤ 0.1 by 2025
<b>4 - QUALITY EDUCATION</b>	Training (pp. 192-195) Company Initiatives for the External Community (Training pp. 216-217, Culture and Social Value pp. 218-219)  Target: → Training: training on Diversity, Equity and Inclusion and Human Rights
<b>5 - GENDER EQUALITY</b>	Diversity, Equity and Inclusion (pp. 185-190)
<b>6 - CLEAN WATER AND SANITATION</b>	Water Management (pp. 161-163)  Target: → Specific water withdrawal: -43% by 2025 compared to 2015
<b>7 - AFFORDABLE AND CLEAN ENERGY</b>	Joining the Task Force on Climate-Related Financial Disclosures (TCFD) (pp. 141-143) Energy Management (pp. 154-156) Management of Greenhouse Gas Emissions and Carbon Action Plan (pp. 156-158)  Targets: → Specific Energy Consumption: -10% by 2025 compared to 2019 → Renewable Electricity purchased at Group level: 100% by 2025 → Group Carbon Neutrality by 2030
<b>8 - DECENT WORK AND ECONOMIC GROWTH</b>	Our Suppliers (pp. 127-139) Internal Community (pp. 179-207)
<b>9 - INDUSTRY, INNOVATION AND INFRASTRUCTURE</b>	Company Initiatives for the External Community (Training pp. 216-217)  Target: → For new product segments, by 2025: > 40% renewable materials, > 8% recycled materials and < 40% fossil-based materials; by 2030: > 60% renewable materials, > 12% recycled materials and < 30% fossil-based materials
<b>10 - REDUCED INEQUALITIES</b>	Diversity, Equity and Inclusion (pp. 185-190)
<b>11 - SUSTAINABLE CITIES AND COMMUNITIES</b>	Main International Commitments for Sustainability (WBCSD pp. 212-213) Company Initiatives for the External Community (Road Safety pp. 215-216, Social Solidarity pp. 217-218)  Targets: → Absolute CO <sub>2</sub> Emissions: -42% by 2025 compared to 2015 → Group Carbon Neutrality by 2030 → Eco & Safety Performance Revenues: > 66% on total car tyres revenues e > 71% on High Value revenues by 2025 → Raw Materials Suppliers Absolute CO <sub>2</sub> Emissions: -8.6% by 2025 compared to 2018 → Evolution of the total product range, by 2025: → more than 70% of new products will be in Rolling Resistance Class A/B; → more than 90% of new products will be in Wet Grip Class A/B.
<b>12 - RESPONSIBLE CONSUMPTION AND PRODUCTION</b>	Joining the Task Force on Climate-Related Financial Disclosures (TCFD) (pp. 141-143) Energy Management (pp. 154-156) Management of Greenhouse Gas Emissions and Carbon Action Plan (pp. 156-158) Water Management (pp. 161-163) Waste Management (pp. 163-165) Company Initiatives for the External Community (Environmental Initiatives p. 218)  Targets: → Specific Energy Consumption: -10% by 2025 compared to 2019 → Absolute CO <sub>2</sub> Emissions: -42% by 2025 compared to 2015 → Renewable Electricity purchased at Group level: 100% by 2025 → Group Carbon Neutrality by 2030 → Water Specific Withdrawal: -43% by 2025 compared to 2015 → Waste Recovery: ≥ 98% by 2025

SUSTAINABLE DEVELOPMENT GOALS (SDGs)	PARAGRAPHS DESCRIBING THE GROUP'S ACTIVITIES IN SUPPORT OF THE SDGs AND RELEVANT TARGETS (FROM SUSTAINABILITY PLAN 2025-2030)
<b>13 - CLIMATE ACTION</b>	<p>CDP Supply Chain (pp. 136)            Joining the Task Force on Climate-Related Financial Disclosures (TCFD) (pp. 141-143)            Management of Greenhouse Gas Emissions and Carbon Action Plan (pp. 156-158)            Main International Commitments for Sustainability (International Commitments against Climate Change pp. 214-215)</p> <p><b>Targets:</b></p> <ul style="list-style-type: none"> <li>→ Specific Energy Consumption: -10% by 2025 compared to 2019</li> <li>→ Absolute CO<sub>2</sub> Emissions: -42% by 2025 compared to 2015</li> <li>→ Renewable Electricity purchased at Group level: 100% by 2025</li> <li>→ Group Carbon Neutrality by 2030</li> <li>→ Eco &amp; Safety Performance Revenues: &gt; 66% on total car tyres revenues e &gt; 71% on High Value revenues by 2025</li> <li>→ Evolution of the total product range, by 2025:               <ul style="list-style-type: none"> <li>→ more than 70% of new products will be in Rolling Resistance Class A/B;</li> <li>→ more than 90% of new products will be in Wet Grip Class A/B;</li> </ul> </li> </ul>
<b>14 - LIFE BELOW WATER</b>	Water Management (pp. 161-163)
<b>15- LIFE ON LAND</b>	Sustainability of the Natural Rubber Supply Chain (pp. 132-133) Company Initiatives for the External Community (Environmental Initiatives p. 218)
<b>16- PEACE, JUSTICE AND STRONG INSTITUTIONS</b>	Compliance Programmes, Anti-Corruption, Privacy, Trade Compliance, Antitrust, Compliance with Laws And Regulations (pp. 111-112)
<b>17 - PARTNERSHIPS FOR THE GOALS</b>	Sustainability of the Natural Rubber Supply Chain (pp. 132-133) Main International Commitments for Sustainability (WBCSD pp. 212-213) Company Initiatives for the External Community (Road Safety pp. 215-216)

## CORRELATION TABLE WITH TOPICS LISTED IN ART. 2, D. LGS 254/2016

	TOPICS FROM D. LGS 254/2016	REFERENCE PARAGRAPH	PAGE NUMBER
<b>ENVIRONMENTAL ASPECTS</b>	<b>Use of Energy Resources (from renewables and non-renewables)</b>	<ul style="list-style-type: none"> <li>Risks Related To Environmental Issues</li> <li>Energy Management</li> </ul>	87, 154-156
	<b>Use of Water Resources</b>	<ul style="list-style-type: none"> <li>Risks Related To Environmental Issues</li> <li>Emerging risks related to climate change and water stress</li> <li>Water Management</li> </ul>	87, 89, 161-163
	<b>Greenhouse Gas Emissions and Air-Polluting Emissions</b>	<ul style="list-style-type: none"> <li>Emerging risks related to climate change and water stress</li> <li>Joining the Task Force on Climate-Related Financial Disclosures (TCFD)</li> <li>Management Of Greenhouse Gas Emissions and Carbon Action Plan</li> <li>Solvents</li> <li>NO<sub>x</sub> Emissions</li> <li>Other Emissions and Environmental Aspects</li> </ul>	89, 141-143, 156-158, 165, 165-166, 166
<b>SOCIAL ASPECTS</b>	<b>Health and Safety</b>	<ul style="list-style-type: none"> <li>Employee Health and Safety Risks</li> <li>Occupational Health, Safety and Hygiene</li> </ul>	87, 200-207
	<b>Training and Development</b>	<ul style="list-style-type: none"> <li>Risks associated with Human Resources</li> <li>Development</li> <li>Training</li> </ul>	86-87, 191-192, 192-195
	<b>Welfare</b>	<ul style="list-style-type: none"> <li>Welfare and Initiatives for the Internal Community</li> </ul>	197-198
	<b>Dialogue with Employees</b>	<ul style="list-style-type: none"> <li>Litigation Risks</li> <li>Listening &amp; Engagement</li> <li>Industrial Relations</li> </ul>	87, 195-197, 198-200
	<b>Actions for Gender Equality</b>	<ul style="list-style-type: none"> <li>Diversity, Equity and Inclusion</li> <li>Diversity Policies</li> </ul>	185-190, 240
	<b>Respect for Human Rights: Measures Taken and Prevention</b>	<ul style="list-style-type: none"> <li>Risks relative to Corporate Social and Environmental Responsibility, and Business Ethics</li> <li>Respect for Human Rights</li> <li>Diversity, Equity and Inclusion</li> </ul>	88-89, 176-177, 185-190
<b>GOVERNANCE ASPECTS</b>	<b>Fight against Active and Passive Corruption</b>	<ul style="list-style-type: none"> <li>Risks Relative to Social and Environmental Responsibility and Business Ethics</li> <li>Compliance Programmes, Anti-Corruption, Privacy, Trade Compliance, Antitrust, Compliance with Laws And Regulations</li> </ul>	88-89, 111-112



**PIRELLI & C SPA**

**INDEPENDENT AUDITOR'S REPORT ON THE CONSOLIDATED  
NON-FINANCIAL DISCLOSURE IN ACCORDANCE WITH  
ARTICLE 3, PARAGRAPH 10, OF LEGISLATIVE DECREE  
254/2016 AND ARTICLE 5 OF CONSOB REGULATION  
20267/2018**

**CONSOLIDATED NON-FINANCIAL DISCLOSURE FOR THE YEAR  
ENDED 31 DECEMBER 2022**





## **Independent auditor's report on the consolidated non-financial disclosure**

*In accordance with article 3, paragraph 10, of Legislative Decree 254/2016 and article 5 of CONSOB regulation 20267/2018*

To the board of directors of Pirelli & SpA

In accordance with article 3, paragraph 10, of Legislative Decree 254/2016 (the Decree) and article 5 of CONSOB Regulation 20267/2018, we have performed a limited assurance engagement on the consolidated non-financial disclosure of Pirelli & C SpA and its subsidiaries (the Pirelli group) for the year ended 31 December 2022 prepared in accordance with article 4 of the Decree, and included in section "Report on Responsible Management of the Value Chain" of the Pirelli annual report 2022 (NFD). The NFD was approved by the board of directors on 5 April 2023.

Our review does not extend to the information set out in the paragraph "The European Regulation on the Taxonomy of sustainable economic activities" of the NFD, required by article 8 of European Regulation 2020/852.

### **Responsibilities of the directors and the board of statutory auditors for the NFD**

The directors are responsible for the preparation of the NFD in accordance with articles 3 and 4 of the Decree, with the "Global Reporting Initiative Sustainability Reporting Standards" defined in 2021 by the GRI - Global Reporting Initiative (GRI Standards) and with the SASB indicators (Sustainability Accounting Standards), international standards issued by the International Sustainability Standards Board, with reference to the "Auto-parts" industry, identified by them as the reporting standards, and with the process suggested by AA1000APS (AccountAbility Principles Standards).

The directors are also responsible, in the terms prescribed by law, for such internal control as they determine is necessary to enable the preparation of a NFD that is free from material misstatement, whether due to fraud or error.

Moreover, the directors are responsible for identifying the content of the NFD, within the matters contained in article 3, paragraph 1, of the Decree, considering the activities and characteristics of the group and to the extent necessary to ensure an understanding of the group's activities, its performance, its results and related impacts.

Finally, the directors are responsible for defining the business and organisational model of the group and, with reference to the matters identified and reported in the NFD, for the policies adopted by the group and for the identification and management of risks generated and/or faced by the group.

The board of statutory auditors is responsible for overseeing, in the terms prescribed by law, the compliance with the Decree.

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### **PricewaterhouseCoopers SpA**

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### ***Auditor's Independence and Quality Control***

We are independent in accordance with the principles of ethics and independence set out in the Code of Ethics for Professional Accountants published by the International Ethics Standards Board for Accountants, which are based on the fundamental principles of integrity, objectivity, competence and professional diligence, confidentiality and professional behaviour. Our audit firm adopts International Standard on Quality Control 1 (ISQC Italia 1) and, accordingly, maintains an overall quality control system which includes processes and procedures for compliance with ethical and professional principles and with applicable laws and regulations.

### ***Auditor's responsibilities***

We are responsible for expressing a conclusion, on the basis of the work performed, regarding the compliance of the NFD with the Decree, with the GRI Standards and SASB and with the process suggested by AA1000APS. We conducted our work in accordance with International Standard on Assurance Engagements 3000 (Revised) – Assurance Engagements Other than Audits or Reviews of Historical Financial Information (“ISAE 3000 Revised”), issued by the International Auditing and Assurance Standards Board (IAASB) for limited assurance engagements.

The standard requires that we plan and perform procedures to obtain limited assurance that the NFD is free from material misstatement. The procedures performed in a limited assurance engagement are less in scope than those performed in a reasonable assurance engagement in accordance with ISAE 3000 Revised, and, therefore, do not provide us with a sufficient level of assurance that we have become aware of all significant facts and circumstances that might be identified in a reasonable assurance engagement.

The procedures performed on the NFD were based on our professional judgement and consisted of interviews, primarily of company personnel responsible for the preparation of the information presented in the NFD, analyses of documents, recalculations and other procedures designed to obtain evidence considered useful.

In detail, we performed the following procedures:

1. analysis of the relevant matters reported in the NFD relating to the activities and characteristics of the group, to assess the reasonableness of the selection process used, in accordance with article 3 of the Decree and with the reporting standard adopted and considering AA1000SES (Stakeholder Engagement Standard);
2. analysis and assessment of the criteria used to identify the consolidation area, to assess the compliance with the Decree;
3. comparison of the financial information reported in the NFD with the information reported in the consolidated financial statements of Pirelli group;
4. understanding of the following matters:
  - a. business and organisational model of the group with reference to the management of the matters specified by article 3 of the Decree;
  - b. policies adopted by the group with reference to the matters specified in article 3 of the Decree, actual results and related key performance indicators;
  - c. key risks generated and/or faced with reference to the matters specified in article 3 of the Decree.



With reference to these matters, we compared the information obtained with the information presented in the NFD and carried out the procedures described under point 6 a) below;

5. understanding of the processes underlying the preparation, collection and management of the significant qualitative and quantitative information included in the NFD.

In detail, we held meetings and interviews with the management of Pirelli & C SpA and with the personnel of Pirelli Deutschland GmbH and Pirelli Neumáticos SA de CV and we performed limited analyses of documentary evidence, to gather information about the processes and procedures for the collection, consolidation, processing and submission of the non-financial information to the function responsible for the preparation of the NFD;

6. analysis of policies and procedures in place and of the coherence of the sustainability management model compared to UNI ISO 26000 principles, among which: governance, human rights, relationship and work conditions, and environment.

Moreover, for material information, considering the activities and characteristics of the group:

- at a group level,
  - a) with reference to the qualitative information included in the NFD, and in particular to the business model, the policies adopted and the main risks, we carried out interviews and acquired supporting documentation to verify its consistency with available evidence;
  - b) with reference to quantitative information, we performed analytical procedures as well as limited tests, in order to assess, on a sample basis, the accuracy of consolidation of the information.
- for the industrial sites located in Breuberg (Germany) and Silao (Mexico), which were selected on the basis of their activities, their contribution to the performance indicators at consolidated level and their location, we carried out site visits during which we met local management and gathered supporting documentation regarding the correct application of the procedures and calculation methods used for the key performance indicators.

### **Conclusion**

Based on the work performed, nothing has come to our attention that causes us to believe that the NFD of Pirelli group for the year ended 31 December 2022 is not prepared, in all material respects, in accordance with articles 3 and 4 of the Decree, with the GRI Standards and with the SASB selected indicators with reference to the “Auto-parts” industry, and with the principles of inclusivity, materiality and responsiveness of AA1000APS, as described in the Methodological note of the “Report on the Responsible Management of the Value Chain”.



Our conclusions on the NFD of Pirelli group do not extend to the information set out in paragraph “The European Regulation on the Taxonomy of sustainable economic activities” of the NFD, required by article 8 of European Regulation 2020/852.

Milan, 6 April 2023

PricewaterhouseCoopers SpA

*Signed by*

Paolo Caccini  
(Partner)

Paolo Bersani  
(Authorized signatory)

*This report has been translated from the Italian original solely for the convenience of international readers.*