

Anti_bribery policy

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Italtel S.p.A. (hereinafter, "Italtel" or the "Company") has always carried out its business activities with correctness, loyalty, transparency and integrity, even through its subsidiaries, in full compliance with the laws and regulations applicable in all markets in which it operates.

Italtel therefore intends to reaffirm this commitment through this anti-bribery policy, in compliance with the ISO 37001 standard.

Specifically, Italtel prohibits any form of active and passive, direct and indirect bribery, and is strongly determined to counteract any violation of the anti-bribery laws that may involve its staff, the staff of its subsidiaries and anyone who operates on its behalf.

For this reason, Italtel has created an anti-bribery management system, in compliance with the ISO 37001 standard, through which, the suitable measures have been defined aimed at monitoring the effectiveness of the related prevention system and its continuous improvement.

To achieve this objective, Italtel is committed to promoting and strengthening an anti-corruption culture at all levels of the organization by raising awareness among all its personnel. In particular, those in managerial roles are expected to communicate ethical values to their staff and to foster ethical behaviour by setting a good example.

To oversee this system, Italtel has established a dedicated function, called the "Corruption Prevention Function," which coincides with the Legal & Compliance function. It also constitutes the main point of reference to which staff can turn for any questions relating to anti-corruption issues, by writing to the email address anticorruzione@italtel.com.

Therefore, this policy, together with the Company's Code of Ethics, the Model of Organization, Management and Control pursuant to the Italian Legislative Decree 231/2001 and laws in force, represent principles and guidelines to which all personnel of Italtel and its subsidiaries shall comply by adopting behaviours consistent with them, in the awareness that any violation regarding bribery could generate not only criminal offenses but also disciplinary sanctions at company level. Specifically, every employee of Italtel and its subsidiaries, in carrying out their activities, complies with ethical principles of transparency, loyalty, correctness and integrity.

With reference to business relationships, collusive behaviour, bribery attempts and favouritism, direct or indirect, solicitations of personal and career advantages for oneself or others and, more generally, acts contrary to applicable laws and regulations are forbidden.

At the same time, third parties with whom the Company has commercial relationships through which it may be exposed to the risk of bribery (the so-called "business associates") are also required to comply with the aforementioned regulations and their non-compliance may lead to the termination of the respective contractual agreements.

Particular attention must be paid to ensuring the absence of any conflict of interest in business activities. All personnel and third parties are required to promptly disclose any situation—including potential ones—that could compromise the impartiality and transparency of decisions, so that such circumstances may be appropriately assessed and managed.

Italtel encourages employees, collaborators and all those who, in any capacity, operate on its behalf to report any bribery, active and passive, even suspected in good faith, using the



whistleblowing platform (<https://www.italtel.com/it/about/whistleblowing/>); in such circumstances, Italtel guarantees the absence of any retaliation that may result from the report.

Italtel commitment is also expressed by sharing, at all levels of the organisation, the anti-bribery system through the steady verification of the correct application of anti-bribery regulations, the definition of objectives and the identification of initiatives aimed at the continuous improvement of the effectiveness of the system.

The awareness of the subjects involved and the dissemination of the elements of the anti-bribery system are the fundamental requirement for the effective prevention of bribery in all its forms; its assumptions are based on an accurate identification of potential bribery risks within company processes. Italtel periodically conducts a corruption risk assessment, considering the internal and external context and factors—such as climate change—that could impact its business processes, with the aim of identifying and implementing the measures and actions necessary to mitigate those risks.

Each subject, employee, collaborator or who operates on behalf of Italtel and its subsidiaries, is required to respect and apply this policy in the execution of their own activities and in relationship with the business associates with whom he interacts.

ITALTEL S.P.A.
Carlo Filangieri
Chief Executive Officer
and General Manager