
Anti-bribery Policy Italtel S.p.A.

Issued by:	Human Resources & Organization
Edited by:	Internal Audit & Compliance, Human Resources & Organization
Approved by:	CEO

Milan, 1st February 2024

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, suitable measures have been defined aimed at monitoring the effectiveness of the related prevention system and its continuous improvement, in order to promote the strengthening of the corporate culture based on correctness, transparency and integrity of every commercial relationship.

To monitor this anti-bribery system, Italtel has established a specific function which acts as a point of reference for all employees regarding any anti-bribery issue.

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 behaviors 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 behavior, 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.

Italtel encourages employees, collaborators and all those who, in any capacity, operate on its behalf to report any bribery, 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 and on the identification and implementation of actions suitable for reducing the risks themselves.

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. – Chief Executive Officer
(Benedetto Di Salvo)