

# **Governance and Responsible Use Policy ON ARTIFICIAL INTELLIGENCE**

## **AI Governance and Responsible Use Policy**

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## **1 PURPOSE OF THE POLICY**

Artificial Intelligence represents a strategic driver of innovation, digital evolution, and growth for Italtel, contributing to the improvement of business processes, the development of innovative products and services, the enhancement of operational efficiency, and the creation of value for customers, partners, and other stakeholders. At the same time, Italtel recognizes that the use of Artificial Intelligence systems can entail ethical, regulatory, organizational, technological, and reputational risks that require appropriate governance safeguards.

This Policy defines the principles, rules, and responsibilities guiding the development, acquisition, integration, use, and commercialization of Artificial Intelligence systems within the Italtel Group, with the aim of ensuring that the use of AI is safe, reliable, transparent, responsible, and oriented towards protecting individuals' fundamental rights.

The Policy aims to integrate the adoption of Artificial Intelligence into the corporate governance system, ensuring the alignment of AI initiatives with the corporate strategy, the Italtel Group's values, the Code of Ethics, the Organization, Management, and Control Model pursuant to Legislative Decree 231/2001, and applicable corporate procedures regarding information security, cybersecurity, risk management, and personal data protection.

Specifically, the Policy aims to:

- define the ethical principles and behavioral criteria that must guide the entire life cycle of Artificial Intelligence systems;
  - ensure compliance with the applicable regulatory framework, including the provisions of the AI Act, national legislation on Artificial Intelligence, the GDPR, and other relevant standards and guidelines;
  - promote an AI governance approach based on accountability, human oversight, transparency, security, and risk management;
  - ensure that AI solutions are developed, purchased, and used according to criteria of reliability, robustness, data quality, non-discrimination, and protection of fundamental rights;
  - define roles, responsibilities, and organizational controls for the management, control, and monitoring of AI initiatives;
  - encourage the use of Artificial Intelligence that generates value for the company and stakeholders, while ensuring the mitigation of legal, ethical, operational, and reputational risks.
- Through this Policy, ITALTEL intends to promote a model of adoption of Artificial Intelligence based on the principle of responsible innovation, in which technological evolution is constantly accompanied by the protection of people,

regulatory compliance, system security, and safeguarding the trust of customers, employees, partners, and the market.

## **2. SCOPE OF APPLICATION**

This Artificial Intelligence Policy applies to Italtel S.p.A. and the companies of the Italtel Group, forming an integral part of corporate governance, internal control, and risk management system.

This does not preclude the possibility that, at the local level, Group companies may adopt local documents, procedures, or implementing provisions that supplement the content of this Policy to address specific organizational, operational, or regulatory requirements applicable to their respective contexts, provided that such measures are consistent with the principles, objectives, and governance safeguards defined in this Policy.

This Policy applies to all employees, collaborators, consultants, suppliers, business partners, and any other party acting on behalf of or in the interest of Italtel (the "Addressees") who are involved in the lifecycle of AI system; it serves as a binding reference for all Addressees, aimed at ensuring that Artificial Intelligence systems are used and managed in a safe, responsible, and transparent manner and in compliance with applicable regulations, thereby preventing legal, ethical, operational, reputational, and security risks.

## **3. DEFINITIONS**

For the purposes of this Policy, the following definitions apply.

### **AI System**

An automated system designed to operate with varying levels of autonomy and which, based on the inputs received, generates predictions, recommendations, content, or decisions that can influence physical or virtual environments.

### **Provider**

A natural or legal person who develops or has developed an AI system and places it on the market or puts it into service under their own name or trademark.

### **Deployer**

A natural or legal person who uses an AI system under their own authority during professional activities.

### **Distributor**

An entity in the supply chain that makes an AI system available on the market without being the Provider.

**System Integrator:** an entity that integrates and configures third-party AI systems within the client's environment, ensuring their proper functioning and interoperability with existing systems and processes.

ITALTEL can operate as a Deployer, Provider, Distributor, or System Integrator.

#### **4. PRINCIPLES AND VALUES FOR RESPONSIBLE AI**

ITALTEL recognizes that Artificial Intelligence must be developed, acquired, used, and governed based on an approach rooted in responsible innovation, the protection of the individual, and respect for fundamental rights. Indeed, the adoption of AI technologies is not an end in itself, but a tool aimed at generating sustainable value for the business, customers, employees, partners, and the community.

##### **4.1 Human-centricity and human oversight**

Artificial Intelligence must be used as a tool to support human capabilities, not as a substitute for human judgment, responsibility, and discretion. Decisions that may have significant effects on individuals, organizations, or stakeholders must therefore remain subject to adequate human oversight.

##### **4.2 Legality and regulatory compliance**

AI systems must be used in full compliance with applicable legislative and regulatory provisions, including the AI Act, Law No. 132/2025, the GDPR, and regulations concerning cybersecurity, intellectual property, worker protection, and the protection of fundamental rights.

##### **4.3 Transparency and explainability**

The use of Artificial Intelligence must be transparent, fostering an understanding of the purposes, operating mechanisms, and key decision-making logic of the systems adopted.

##### **4.4 Equity, inclusion, and non-discrimination**

It is essential that Artificial Intelligence be used in a manner that respects human rights, equal opportunities, and inclusion, while avoiding any potential discriminatory bias.

##### **4.5 Safety, robustness, and resilience**

Artificial Intelligence systems must be designed, implemented, and managed throughout their lifecycle in such a way as to be technically robust, safe, and resilient.

#### **4.6 Data protection and confidentiality**

The protection of personal data, corporate information, and information assets is a fundamental requirement for any use of AI. Italtel adopts an approach based on the principles of privacy by design and by default, data minimization, proportionality, integrity, and confidentiality, ensuring that AI systems are used in compliance with internal rules and applicable data protection regulations.

#### **4.7 Output quality**

Results generated by AI systems must undergo appropriate checks before use. Users must critically verify the accuracy, completeness, and reliability of AI-generated outputs before utilizing them.

#### **4.8 Accountability and risk management**

The use of AI must be accompanied by a clear assignment of roles, responsibilities, and control measures. Italtel promotes a governance model that ensures decision traceability, documentation of activities performed, continuous system monitoring, and proactive management of the legal, ethical, operational, reputational, and security risks associated with Artificial Intelligence.

#### **4.9 Training and awareness**

Fostering a culture of responsible Artificial Intelligence requires adequate levels of competence and awareness. Italtel promotes training and continuous professional development initiatives so that employees, collaborators, and other involved parties can understand the opportunities, limitations, risks, and responsibilities associated with the use of AI systems, and operate in an informed, secure, and ethical manner.

### **5. ARTIFICIAL INTELLIGENCE GOVERNANCE**

The implementation of this Policy is supported by an Artificial Intelligence governance model designed to ensure that the development, acquisition, use, and commercialization of AI systems take place in a coordinated, responsible manner that complies with applicable regulations and aligns with Italtel's values, strategic objectives, and internal control system.

#### **5.1 Board of Directors and Chief Executive Officer**

The Board of Directors, within the scope of its supervisory functions, acknowledges this Policy and the Artificial Intelligence governance model adopted by the Company.

In particular, the Board of Directors:

- receives, at least on a semi-annual basis, a report from the Chief Executive Officer, who chairs the AI Compliance Committee, regarding the implementation status of the Artificial Intelligence strategy and governance, key ongoing initiatives, significant risks, and any critical issues that have arisen;

- assesses, based on the information received, the adequacy of the safeguards adopted by the Company regarding Artificial Intelligence;
- promotes, within the scope of its corporate governance functions, a culture oriented towards responsible innovation, informed risk management, and the reliable use of Artificial Intelligence.

The definition and implementation of corporate strategy and initiatives regarding Artificial Intelligence are managed through the AI Compliance Committee (as defined below), which is chaired by the Chief Executive Officer, who approves AI-related policies and procedures.

## **5.2 AI Compliance Committee**

The AI Compliance Committee, chaired by the Chief Executive Officer, represents the core of ITALTEL's Artificial Intelligence governance and serves as the corporate body responsible for directing, coordinating, and supervising AI-related initiatives.

In accordance with the relevant corporate organizational directive, the AI Compliance Committee:

- defines strategic guidelines for the adoption and use of Artificial Intelligence within the Group;
- implements and oversees regulatory compliance measures (AI Act and/or other applicable regulations);
- promotes and approves projects involving the use of AI within the company and/or the sale of AI technologies to customers;
- defines the periodic audit plan for AI systems and verifies updates to the risk map;
- promotes and oversees staff training;
- receives and evaluates reports regarding incidents, anomalies, malfunctions, or critical issues related to AI systems, directing the resulting corrective and mitigation actions;
- reports periodically through the Chief Executive Officer to the Board of Directors on activities performed and the overall status of Artificial Intelligence governance.

## **5.3 Relevant Corporate Functions**

The relevant corporate functions support the AI Compliance Committee in implementing this Policy and contribute, each within its own area of competence, to the responsible and compliant management of Artificial Intelligence systems.

In particular, they:

- provide regulatory, legal, ethical, and technical support for AI initiatives;
- contribute to the assessment and management of risks associated with AI systems;
- oversee information security, cybersecurity, and personal data protection aspects;
- support the classification of AI systems in accordance with the AI Act and other applicable regulations;
- collaborate in defining measures for risk control, monitoring, and mitigation;
- contribute to verifying the regulatory and procedural compliance of adopted solutions;
- support the management of incidents and reports related to AI systems;
- promote the dissemination of skills and corporate culture regarding Artificial Intelligence.

#### **5.4 Integrated governance principle**

ITALTEL's Artificial Intelligence governance is based on an interdisciplinary and collaborative approach involving relevant corporate functions throughout the entire lifecycle of AI systems. This approach ensures that decisions regarding the adoption and use of Artificial Intelligence are made by jointly considering business needs, technological aspects, regulatory compliance, security, data protection, sustainability, and the protection of fundamental rights.

### **6. GOVERNANCE TOOLS**

To ensure effective, controlled, and compliant management of Artificial Intelligence, ITALTEL maintains an AI Systems Register. This serves as a corporate tool for the governance, monitoring, and traceability of Artificial Intelligence solutions present within the organization or offered as part of its business activities.

The Register lists all AI systems for which Italtel acts —depending on the specific case — in one or more of the roles defined by applicable regulations.

For each system, essential information for governance and compliance purposes is recorded and kept up to date, including:

- use case and scope of application;
- responsible corporate function;
- role played by Italtel;
- risk level;
- type of system;
- categories of data processed;
- human oversight and control measures adopted;

The Register serves as a supporting tool for governance, risk management, audit, and continuous monitoring activities, ensuring adequate levels of transparency, accountability, and control regarding the use of Artificial Intelligence within the Group.

## **7. AI LITERACY**

ITALTEL recognizes that the dissemination of appropriate Artificial Intelligence skills is essential to ensure the safe, responsible, effective, and informed use of AI systems. In compliance with the AI Act, ITALTEL promotes training and awareness-raising initiatives for the Addressees of this Policy, tailored to their respective roles, responsibilities, and methods of using AI systems.

## **8. REPORTING**

The Addressees of this Policy are required to promptly report any non-compliant use, anomalies, incidents, or risks associated with Artificial Intelligence systems through the designated corporate channels, including whistleblowing channels where applicable.

In this regard, reports may be sent to the AI Compliance Committee at the following e-mail address: [aicompliancecommittee@italtel.com](mailto:aicompliancecommittee@italtel.com)

Violation of this Policy may result in the adoption of corrective measures and the application of disciplinary actions in accordance with applicable regulations and company procedures.

ITALTEL monitors the reports received and takes the necessary actions to ensure the continuous improvement of its Artificial Intelligence governance system.

## **9. REVISIONS**

This Policy is subject to periodic review to ensure it remains aligned with evolving applicable regulations, Artificial Intelligence technologies, the corporate operating environment, and the governance model adopted by ITALTEL.

The Policy may be updated at any time in the event of significant regulatory changes, new guidelines from competent authorities, organizational shifts, or the introduction of new AI systems that necessitate a revision of corporate rules and controls.

The relevant corporate functions ensure continuous monitoring of regulatory and technological developments and propose the updates required to maintain an adequate level of compliance, security, and reliability in the use of Artificial Intelligence.

ITALTEL SPA  
CEO & GENERAL MANAGER  
Eng. Carlo Filangieri