Integrated Policy

Wind Tre S.p.A. intends to formally express its commitment to customer satisfaction and privacy, environmental protection, rational energy use and the improvement of its energy performance and the health, safety and human rights protection of workers. Under the Master/Child certification model, the commitments set out in this Policy relating to the ISO 9001, ISO 14001 and ISO 45001 schemes also apply to OpNet S.r.l., insofar as relevant to the respective certification scopes, processes and responsibilities.

The Policies relating to the other management systems apply to Wind Tre S.p.A.

To this end, the company has identified the primary objectives for corporate activities:

- ❑ to comply with applicable local, national and international laws and the voluntary standards adopted
- ❑ to meet the expectations of customers and corporate stakeholders through engagement, dialogue and searching for the best solutions
- ❑ to effectively apply specific policies and procedures for quality, the environment, energy, social responsibility, health and safety at work and information security
- ❑ to continuously improve the integrated management system, which can be measured through performance and achieved objectives

In keeping with the principles of the Code of Ethics and the Organisational Model, Wind Tre considers its Integrated Management System, extended to OpNet under the Master/Child model for the ISO 9001, ISO 14001 and ISO 45001 schemes, to be a fundamental tool for supporting and improving business activities.

Wind Tre's staff, customers, suppliers and other stakeholders and, for the applicable areas, those of OpNet, share these principles in the knowledge that compliance with them is essential for achieving and maintaining the objectives relating to quality, social responsibility, environmental protection, and health and safety.

Wind Tre Management recognises the strategic value of the Integrated Management System and is actively involved in complying with and implementing the commitments it contains, ensuring and periodically verifying that this Policy is documented, implemented, maintained, periodically reviewed, distributed to all personnel and made available to the public. For the ISO 9001, ISO 14001 and ISO 45001 schemes, OpNet Management adopts this Policy and ensures, within its area of responsibility, the implementation of the commitments applicable to the Child company.



*The Policies within the **Environmental** dimension define the organization's commitments to environmental protection and energy efficiency.*

ISO 14001 Policy

Wind Tre S.p.A. Management, aware of the need to develop its business in compliance with the principles of environmental sustainability established at international level and inspired by the 17 United Nations Sustainable Development Goals, considers environmental protection and preservation a key element of its business strategy. Under the Master/Child model, this Environmental Policy is also adopted by OpNet S.r.l. and applies, insofar as relevant, to its certification scope.

The Environmental Strategy developed by Wind Tre and adopted by OpNet for its certification scope aims to:

- ❑ make it clear to management and all personnel that environmental protection activities against all forms of pollution are a top priority for the company
- ❑ ensure compliance with local, national and international laws and regulations concerning environmental protection
- ❑ evaluate the risks and opportunities related to environmental aspects, related regulatory obligations and sustainability requirements expressed by stakeholders
- ❑ manage the network technological equipment to limit energy consumption and promote the replacement of end-of-life components with more environmentally efficient products, thanks to the simultaneous integration of sustainability criteria and requirements in the corporate procurement process
- ❑ redefine the scope of work environments with a view to flexible work, in order to reduce the environmental footprint linked to water and energy consumption and the production of waste by personnel
- ❑ invest in the modernisation of work environments and services to staff by applying environmental protection criteria, encouraging the use of automatic devices for the management of lighting and air conditioning systems and ensuring the availability of comfortable and sustainable alternatives to the use of single-use plastic
- ❑ contribute to the fight against climate change and global warming by reducing climate-changing gas emissions, to be achieved by measures aimed at improving energy efficiency and reducing energy consumption within the framework of

management and reporting systems to be certified according to the ISO 50001 and ISO 14064 standards

- ❑ require stakeholders to understand the principles expressed in this Environmental Policy and encourage them to share and comply with them with particular regard to the supply chain, of which Wind Tre intends to raise the sustainability rating
- ❑ set up the Environmental Management System to continuously improve its performance and constantly monitor its adherence to the targets set in order to correct any deviations

This Policy sets out the values at the core of the company's management system and constitutes a formal commitment that must be shared and disseminated at every level in order to guide the daily work of Wind Tre personnel and, insofar as applicable to its certification scope, OpNet personnel.

ISO 50001 Policy

Wind Tre S.p.A. Management, aware of the need to develop its business by promoting actions to combat climate change and global warming, at all levels, through the reduction of climate-changing gas emissions, has decided to integrate the commitment to rational energy use and the continuous improvement of its energy performance into its corporate strategy.

For Scope 1 and Scope 2 emissions, Wind Tre S.p.A. undertakes to become 100% Carbon Neutral by 2030 through an organised process of quantification, reduction and compensation of CO2 emissions generated by its products and services.

The Energy strategy developed by Wind Tre aims to:

- ❑ make it clear to management that activities to combat climate change, including actions aimed at energy efficiency, are of the highest priority for the company
- ❑ ensure compliance with local, national and international laws and regulations relating to energy efficiency, energy use and energy consumption
- ❑ evaluate the risks and opportunities related to energy aspects, related regulatory obligations and relevant requirements expressed by stakeholders
- ❑ consider the optimisation of energy performance in the design phase of new assets and renovation of existing assets
- ❑ support the purchase of green energy and energy-efficient products, equipment and services, informing suppliers that energy performance is one of the criteria for assessing supplies
- ❑ inform and make workers aware of the need to support effective energy management

- require stakeholders to understand the principles expressed in this Energy Policy and encourage them to share and comply with them
- set up the Energy Management System to continuously improve energy performance and constantly monitor its adherence to the targets set in order to correct any deviations

This Policy sets out the values at the core of the company's management system and constitutes a formal commitment that must be shared and disseminated at every level in order to guide the daily work of each worker.



SOCIAL

*The Policies within the **Social** dimension define the organisation's commitments to people, safety, inclusion and social responsibility.*

ISO 45001 Policy

Wind Tre S.p.A. Management, aware of the need to develop its business in compliance with legislation on workers' health and safety considers the protection of workers' health and safety a key element of its business strategy. Under the Master/Child model, this Occupational Health and Safety Policy is also adopted by OpNet S.r.l. and applies, insofar as relevant, to its certification scope.

The Occupational Health and Safety Strategy developed by Wind Tre and adopted by OpNet for its certification scope aims to:

- ❑ make it clear to management and all personnel that protecting them against risks associated with work is a top priority for the company
- ❑ ensure compliance with local, national and international laws and regulations concerning the health and safety of workers
- ❑ assess the risks and opportunities related to risk factors, legal requirements and those arising from stakeholder expectations
- ❑ ensure the creation of a software platform that allows the authorisation and compliance documentation of each company office to be shared, improving document availability and the control of the legal deadlines
- ❑ redefine the scope of the work environment with a view to flexible work, in order to improve the balance in the relationship between work and personal commitments and reduce the risks of accidents when reaching the workplace
- ❑ increase and improve participatory and sharing processes between the Safety Management System and the 231 organisational model
- ❑ improve the company car fleet by replacing existing one with vehicles equipped with advanced safety systems
- ❑ set up the Safety Management System to continuously improve performance and constantly monitor its adherence to the targets set in order to correct any deviations

This Policy sets out the values at the core of the company's management system and constitutes a formal commitment that must be shared and disseminated at every level in

order to guide the daily work of Wind Tre personnel and, insofar as applicable to its certification scope, OpNet personnel.

SA8000 Policy

Wind Tre S.p.A. Management, aware of the fundamental importance of human and relational capital in the achievement of business and sustainability objectives, integrates a Management System for Social Responsibility compliant with the SA8000 standard among the tools available to its corporate strategy.

- Wind Tre is committed to ensuring that all activities comply with:
- the SA8000 standard
- current national laws
- ILO (International Labour Organization) and UN conventions concerning Human Rights

voluntary commitments adopted by the company.

- ❑ Management guarantees:
- ❑ not to use or support the use of child labour
- ❑ not use or support forced or compulsory labour
- ❑ to ensure a safe and healthy workplace
- ❑ to respect the right to collective bargaining and protect the freedom of association
- ❑ not to adopt or support any form of discrimination
- ❑ to treat all staff with dignity and respect by carrying out proper management of disciplinary procedures
- ❑ to comply with industry laws and standards on working time
- ❑ to pay employees in accordance with their contracts

to regularly review this policy and ensure the continuous improvement of its Management System for Social Responsibility.

- ❑ To champion its commitment, Management undertakes to:
- ❑ ensure respect for equal opportunities, introduce measures to promote gender equality and promote women's access to management positions,
- ❑ assess the risks associated with any misalignment between wages paid and the living wage

- expand the synergy with the Occupational Health and Safety Management System to improve document availability and control of regulatory compliance,
- disseminate and communicate, without distinction of level, knowledge on the subject of respect for Human and Workers' Rights and the ethical principles of Social Responsibility.
- strengthen communications related to Wind Tre's expectations about the respect of Human Rights by contracted and subcontracted companies and their workers
- facilitate the exercise of the right to whistleblowing and lodging complaints also in an anonymous form, in order to extend the company's monitoring capacity

generate greater trust on the part of users and social organisations, demonstrating respect for ethical and social principles.

In order to improve the relationship with all stakeholders, Wind Tre S.p.A. wishes the principles of the standard to be understood not only by the organization itself, but also by all suppliers/sub-suppliers and contractors/sub-subcontractors involved in the activities provided.

Aware of the commitment undertaken, Wind Tre undertakes to communicate its social benefits with appropriate tools.

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UNI/PdR 125 Policy

1. Introduction

The Wind Tre Group (Wind Tre Italia S.p.A. and all companies directly and/or indirectly wholly owned by Wind Tre Italia S.p.A.) promotes the workplace inclusion of all its people, recognises its importance and value, and ensures respect for their rights and dignity. The company has always been committed to ensuring equal professional opportunities for all its people and to fostering an inclusive culture that values individuality, respect, a sense of belonging, dialogue, listening and fair participation. WINDTRE is actively committed to promoting an open, respectful and inclusive culture inspired by the Corporate Purpose "We exist to eliminate any distance between people" and by the values of Courage, Trust, Responsibility and Inclusion. Furthermore, for many years it has been committed to implementing its ESG plan, particularly Goal #6 dedicated to gender equality.

2. Commitment and scope

This Gender Equality Policy was developed by the Human Resources Department of Wind Tre S.p.A. in cooperation with the Steering Committee established for this purpose, in harmony with the WINDTRE Code of Ethics and consistently with the guiding values set out in the "CK Hutchison Human Rights Policy". The Gender Equality Policy defines Wind Tre's principles, objectives and commitments regarding gender equality, the enhancement of differences and women's empowerment.

Wind Tre undertakes to:

- promote a culture focused on diversity, equity and inclusion in a working environment free from stereotypes, discrimination and any form of physical, verbal or digital abuse, ensuring respect for the constitutional principle of equality within the organisation and in day-to-day work;
- ensure that all stages of its people's life cycle (recruitment, training, growth and development paths, remuneration, benefits and welfare plans) are based on the principles of equal opportunity, inclusion and meritocracy;
- increase awareness of gender equality, diversity and inclusion through the development of training programmes, communication campaigns and specific projects;
- ensure fair gender representation in the performance of different company activities, working to prevent any form of discrimination;
- draw up the Gender Equality Strategic Plan in line with the purpose, values and sustainability plans, consistently with the guidelines defined by the Group and with the principles of equity and equal opportunity;
- ensure effective cooperation with trade associations and trade unions in order to provide for and safeguard employees' rights and protections against all forms of discrimination;

The Gender Equality Policy applies to the Wind Tre Group (Wind Tre Italia S.p.A. and all companies directly and/or indirectly wholly owned by Wind Tre Italia S.p.A.) and to stakeholders, also guiding business relationships with suppliers and partners.

3. Gender equality objectives and commitments

Wind Tre promotes the integration of Gender Equality Principles throughout its organisational structure at all levels and, with specific reference to its people, intends to oversee the following areas of action:

- **Recruitment and hiring**: Wind Tre is committed to attracting and hiring people with different backgrounds and abilities, pursuing gender equality by identifying, as far as possible, a gender-balanced pool of candidates and valuing merit, experience, abilities and skills. It also ensures that the recruitment process is free from discrimination and gender stereotypes and that job descriptions and vacancy notices use inclusive language.
- **Career management**: Wind Tre ensures equal opportunities in professional development and career progression, basing assessment processes on objective and transparent criteria, merit, skills and performance. It promotes balanced gender representation in roles of responsibility and supports the development and empowerment of women.
- **Pay equity**: Wind Tre ensures fair and equitable remuneration in compliance with the law and the applicable National Collective Labour Agreement. To this end, it has implemented policies and procedures designed to ensure equal pay for people performing similar or equivalent roles, regardless of gender, ethnicity or other personal characteristics.
- **Parenthood and care**: with full respect for the individual, Wind Tre protects parenthood and caregiving by recognising the full exercise of maternity and paternity leave rights and supporting care activities through targeted welfare initiatives. Furthermore, including in the event of prolonged absence due to illness or maternity, the working conditions in place before the leave are maintained and the individual is supported during the return-to-work phase.
- **Work-life balance**: Wind Tre develops concrete measures to ensure work-life balance for its people, continuously providing flexible and hybrid working arrangements based on individual responsibility (Human Working), as well as the possibility of using flexible working-time solutions (Time4Me).
- **Prevention of abuse and harassment**: Wind Tre is committed to preventing abuse and harassment in the workplace by raising awareness of gender-based violence and harassment in order to build awareness among its people. Any form

of discrimination, physical, verbal or psychological abuse in the workplace, and any form of sexual harassment against people of any gender, is prohibited. All Wind Tre people are required to report any non-compliant conduct by referring to the Whistleblowing reporting procedure.

- **Communication**: Wind Tre communicates internally and externally in a careful and transparent manner, using inclusive and respectful language and promoting a positive image of women and young women in the workplace. It is also committed to avoiding gender stereotypes in internal communications and in its advertising and press activities.

With reference to the areas listed above, Wind Tre adopts a management and monitoring system to verify that the various company processes, both at the design and implementation stages, comply with international gender-equality practices, using key performance indicators (KPIs) consistent with UNI/PdR 125:2022 and related actions. A Steering Committee is established to achieve the equality objectives identified in the Strategic Plan, which must be achievable, specific and measurable. The Steering Committee is responsible for implementing this Policy and reviewing it annually, where necessary. HR functions are provided with adequate resources, authority and organisational independence to identify, propose and manage, together with the relevant functions, the maintenance of the Gender Equality Management System and solutions aimed at correcting gender-inequality issues.

4. Communication and dissemination

Wind Tre undertakes to ensure the widest possible internal and external dissemination of this Policy by communicating it to the entire company population and to stakeholders and by providing information and awareness-raising activities on gender equality.

5. Monitoring, reporting and updating the Policy

Wind Tre undertakes to periodically verify the adequacy of this document and to update it in the event of significant regulatory changes or whenever necessary.



GOVERNANCE

*The Policies within the **Governance** dimension define the organisation's commitments to effective, secure, resilient and ethical management.*

ISO 9001 Policy

Wind Tre S.p.A. Management, aware of the need to develop its business in compliance with the requirements expressed by customers, has decided to integrate this commitment into its corporate strategy by ensuring that high-quality, reliable and sustainable products and services are offered on the market. Under the Master/Child model, this Quality Policy is also adopted by OpNet S.r.l. and applies, insofar as relevant, to its certification scope and Wholesale processes.

The Quality Strategy developed by Wind Tre and adopted by OpNet for its certification scope aims to:

- ❑ Periodically assess and review the reference business context in order to prevent risks and seize any opportunities that may arise
- ❑ ensure the quality of products and services offered, by understanding and meeting the needs of both external and internal customers, continuously improving the effectiveness and efficiency of processes
- ❑ gather and manage suggestions for improvement
- ❑ guarantee compliance with the legislative requirements applicable to the product and service offered, as well as instructions from the Telecommunications Guarantee Authority
- ❑ guarantee the service standards set out in the WINDTRE Service Charters, where applicable, and those defined in the agreements and contractual requirements relating to OpNet Wholesale services
- ❑ guarantee constant improvement in the quality of the services offered and their adaptation to the technological evolution of the market by implementing investment programmes
- ❑ ensure that its personnel are always adequately trained in their areas of remit
- ❑ appropriately monitor suppliers involved in business processes in order to ensure that their operations are compliant with quality requirements

This Policy sets out the values at the core of the company's management system and constitutes a formal commitment that must be shared and disseminated at every level in

order to guide the daily work of Wind Tre personnel and, insofar as applicable to its certification scope and Wholesale processes, OpNet personnel.

ISO/IEC 27001 Policy

Wind Tre S.p.A. Management, aware of the need to develop its business while safeguarding the continuity of the services provided (within the certification perimeter) and of the requirements of confidentiality, integrity and availability of the information processed (IT and non-IT), has decided to integrate this commitment into its corporate strategy by implementing an Information Security Management System (ISMS), in accordance with the ISO/IEC 27001:2013 standard concerning:

- "Provision of Security Management services and management of the SOC (Security Operation Center)"
- "Provision of Cloud Services (IaaS), Housing and Physical Security of supporting Data Centres"
- "Provision of Cloud Backup and Disaster Recovery Protection Services (SaaS)"

with extension to the use of the ISO/IEC 27017:2015 and ISO/IEC 27018:2019 guidelines for the IaaS and SaaS perimeters.

The Information Security Strategy aims to:

- ensure compliance with the requirements of confidentiality, integrity and availability of the information managed within the perimeters relating to the services indicated in this policy
- apply appropriate encryption solutions based on the business vulnerability of the information managed and in compliance with the applicable regulatory requirements
- ensure compliance with company policies and strategies
- set up and maintain an internal department to support the ISMS
- provide the following activities, considering the presence of third parties involved in the supply of key activities to support the provision of services:
  - manage third parties through appropriate procedures and control measures to be agreed and established
  - review existing contracts with the main third parties, in order to verify that appropriate security clauses are in place
- identify SOC and IaaS/SaaS service continuity requirements, and design/implement related processes, procedures and technology solutions to support them
- raise awareness and adequately train internal/third-party staff on information security issues, including ethical and behavioural principles

- ❑ increase the value and quality of the services offered, as perceived by customers.

Aware of the commitment made, and certain that a clear and transparent operational policy is a useful tool to convey the principles related to proper management of information security, Wind Tre is committed to:

- ❑ circulating and communicating this policy to all the internal personnel involved by posting it on the company intranet, and to the third-party personnel involved by means of the appropriate communication channels
- ❑ reviewing this policy approximately once a year and in any case following changes linked to both internal and external factors.

ISO/IEC 20000-1 Policy

Wind Tre S.p.A. Management, aware of the need to develop its business while safeguarding the continuity of the services provided within the certification scope, has decided to integrate this commitment into its corporate strategy by implementing a Service Management System (SMS), in accordance with ISO/IEC 20000-1:2018, for the following scope:

WIND TRE S.p.A. IT service management system supporting Corporate Companies and Public Administrations for:

- ❑ *telecommunications and technology infrastructure services, telecommunications products and services;*
- ❑ *provision and after-sales support of fixed and wireless telecommunications, data transmission and related value-added services;*
- ❑ *IT solutions.*

Management undertakes to:

- ❑ continuously ensure compliance with applicable laws and other regulations;
- ❑ ensure the appropriate and proper use of the technologies adopted and, where possible, pursue their improvement or the adoption of more advanced technologies;
- ❑ seek effective cooperation with all interested parties to improve the business processes supporting IT services;
- ❑ optimise business processes in order to maximise their effectiveness and efficiency in line with the state of the art;
- ❑ make all personnel aware of their responsibilities in the delivery of IT services;

- analyse Customer needs and monitor, continuously and effectively, the fulfilment of Customer expectations;
- exercise appropriate managerial and financial control over service performance;
- analyse actual service results against the initial assumptions in order to validate them;
- select and promote relationships with suppliers involved in the delivery of IT services in accordance with the principles of this Policy, requiring them to maintain conduct consistent with it.

Aware of the commitment made, and certain that a clear and transparent operational policy is a useful tool for conveying the principles of proper management of the services provided, Wind Tre undertakes to:

- circulate and communicate this Policy to all internal personnel involved by publishing it on the company intranet, and to the third-party personnel concerned through the appropriate communication channels;
- review this Policy approximately once a year and, in any case, following changes linked to internal or external factors.

ISO 22301 Policy

Wind Tre S.p.A. Management, aware of the need to develop its business while safeguarding the operational continuity of the services provided within the certification scope, has decided to integrate this commitment into its corporate strategy by implementing a Business Continuity Management System (BCMS), in accordance with ISO 22301:2019, for the following scope:

- Provision of ICT Security Management services and management of the SOC (Security Operations Center)

The Business Continuity Strategy aims to:

- define and implement continuity measures proportionate to the identified risk levels;
- strengthen the organisational, technological and physical resilience required to ensure service continuity in the event of disruptive incidents;
- ensure that services are maintained and restored within the timeframes and service levels defined by the organisation on the basis of Business Impact Analyses and the continuity strategies adopted;
- meet the business continuity requirements defined by customers, regulatory bodies and other relevant interested parties;

- ensure that contracts with key third parties include appropriate business continuity clauses consistent with the service levels defined by the organisation;
- raise awareness and adequately train internal and third-party personnel on business continuity matters, including ethical and behavioural principles;
- periodically plan and perform business continuity tests and exercises in order to verify effectiveness and identify opportunities for improvement;
- adopt solutions aimed at continually improving the effectiveness of the Business Continuity Management System;
- establish and maintain an appropriate corporate function supporting the Business Continuity Management System;
- ensure compliance with corporate policies and strategies.

Aware of the commitment made, and certain that a clear and transparent operational policy is a useful tool for conveying the principles of sound business continuity management, Wind Tre undertakes to:

- circulate and communicate this Policy to all internal personnel involved by publishing it on the company intranet, and to the third-party personnel concerned through the appropriate communication channels;
- review this Policy approximately once a year and, in any case, following changes linked to internal or external factors.

ISO 37001 Anti-Bribery Policy

1. FIELD OF APPLICATION

This Policy, approved by the Board of Directors of Wind Tre S.p.A., is an integral part of the Anti-Bribery Management System (SGPC, from the Italian Sistema di Gestione per la Prevenzione della Corruzione), adopted by Wind Tre S.p.A. in accordance with the UNI ISO 37001 international standard and is intended to prevent, detect and respond promptly to any act of bribery.

Wind Tre S.p.A. is a member of the Wind Tre Group, which also includes Wind Tre Italia S.p.A., Wind Tre Retail S.r.l., 3Lettronica Industriale S.p.A., Opnet S.r.l. and Wind Tre Gas e Luce S.r.l. (hereinafter, “Wind Tre Group” or “Group”).

This Policy applies to Wind Tre S.p.A. and to all Companies within the Wind Tre Group, which transpose and adopt its contents whilst adapting them, where necessary, to the specificities of their business, corporate governance and organisational structure as well as to the specific regulations applying thereto. It is the guiding framework for bribery prevention throughout the Group.

The Wind Tre Group believes that reputation and professional integrity are essential for building relationships based on trust and generating sustainable value over time; for this

reason, both Wind Tre S.p.A. and all Group Companies undertake to ensure their adequate supervision while acting as responsible and ethical suppliers of products and services in the telecommunications, energy and insurance industries.

Wind Tre S.p.A., which adopted the Anti-Bribery Management System pursuant to ISO 37001, ensures that this Policy is duly incorporated by all Group companies by carrying out regular audits as well as communication and training activities.

2. PURPOSE

This document is intended to give a clear and systematic picture to be used as reference for bribery prevention management, summarising the principles and rules of conduct set out in Wind Tre Group Policies and Procedures, which all Recipients must adopt to ensure full compliance with anti-bribery regulations.

Specifically, the Group has endorsed a “zero tolerance” approach toward any form of bribery and undertakes:

- to prohibit any form of bribery and ensure compliance with all applicable national and international anti-bribery regulations;
- to ensure the sustainability, honesty and transparency of its business, combating all illegal activities;
- to spread a corporate culture based on loyalty, integrity, honesty, free competition and transparency as its core values;
- to promote and develop ethics in economic relations to protect the market, combating any form of unlawfulness;
- to adopt an Anti-Bribery Management System as a tool that can actually respond to bribery, requiring the constant engagement and leadership of its Management Body, Top Management and Anti-Bribery Function and strengthening its control system at all organisational levels;
- to increase all stakeholders' awareness with regard to preventing and fighting bribery;
- to promote an integrated control system that can be easily acquired and understood, implemented and monitored, ensuring efficacy and effectiveness in its preventive function;
- to encourage the reporting of any act of bribery, even if only suspected or potential, through appropriate channels and dedicated procedures which, whilst protecting the reputation and image of Group Companies, allow for checks and controls to be made to assess whether such reports are grounded and possibly adopt measures against such acts whilst also protecting whistleblowers against any retaliation;
- to adopt rules that protect and ensure the protection of whistleblowers.

3. REFERENCES AND ASSOCIATED DOCUMENTS

The documents underpinning this Policy are:

Internal references

- ❑ Code of Conduct adopted by Wind Tre Group Companies (“Code”)
- ❑ Organisational, Management and Control Model pursuant to Italian Legislative Decree 231/2001 adopted by Wind Tre Group Companies (“Model 231”)
- ❑ Supplier Code of Conduct
- ❑ Whistleblowing Policy of W3 Companies (Wind Tre S.p.A; Wind Tre Italia S.p.A and 3lettronica Industriale S.p.A)
- ❑ Whistleblowing Policy of Wind Tre Retail S.r.l.
- ❑ Whistleblowing Procedure of Opnet S.r.l.
- ❑ Conflict of Interest Procedure
- ❑ Donations and Sponsorships Procedure
- ❑ Gifts and Hospitality Procedure
- ❑ Business Partner Due Diligence Procedure
- ❑ Human Resources Search and Recruitment Procedure
- ❑ Procurement Procedures
- ❑ Relations with Institutions, the Public Administration and Inspections Procedure
- ❑ CKH Group Antifraud and Antibribery Policy
- ❑ Any other procedure regulating processes that are deemed relevant to the risk of bribery

External references

- National and international anti-bribery regulations, including:

❑ Italian Criminal Code (Art. 317 extortion; Art. 318 bribery for the exercise of one's duties; Art. 319 bribery for an act contrary to one's public duties; Art. 319 ter bribery in judicial proceedings; Art. 319 quater undue influence to give or promise a benefit; Art. 320 bribery of a public official; Art. 321 punishments for the bribe payer; Art. 322 incitement to bribery; Art. 322-bis – embezzlement, extortion, bribery or incitement to bribery of members of European Community bodies or foreign countries; Art. 346 bis – influence peddling)

❑ Italian Civil Code (Art. 2635 bribery between private parties; Art. 2635 bis – incitement to bribery between private parties; Art. 2653 ter ancillary punishments)

❑ Italian Presidential Decree 62/2013 - Civil Service Code

❑ Italian Law 136/2010 Traceability of financial flows

❑ Italian Legislative Decree 36/2023 New Code of public contracts (Public Procurement Code)

❑ Italian Legislative Decree no. 231 of 8 June 2001 – "Administrative liability of legal persons, companies and associations, even without legal personality, in accordance with art. 11 of Italian Law no. 300 of 29 September 2000";

❑ UK Bribery Act, issued in the UK in 2010.

❑ Foreign Corrupt Practices Act (FCPA) – United States, 1977, Italian Law 190/2012, Provisions for the prevention and suppression of corruption and illegality within the Public Administration.

❑ Italian Legislative Decree 24/2023 - Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and on the protection of persons who report breaches of national laws.

- International technical standards:

❑ UNI ISO 37001:2016 "Anti-Bribery Management Systems".

4. DEFINITIONS AND ABBREVIATIONS

Management Body	The Board of Directors of Wind Tre S.p.A., in charge of the final supervision of the Anti-Bribery Management System adopted by Wind Tre S.p.A. and of approval of this Policy.
Top Management	The Chief Executive Officers of Wind Tre S.p.A., in charge of reviewing and updating this Policy and of implementing and actually enforcing the Anti-Bribery Management System of Wind Tre S.p.A.
Anti-Bribery Function (FCPC, from the Italian Funzione di Conformità per la Prevenzione della Corruzione)	A figure within the company who is appointed by the Board of Directors of Wind Tre S.p.A. and who, among other things, is required and has authority to ensure that the Anti-Bribery Management System of Wind Tre S.p.A. is planned, implemented and maintained in accordance with ISO 37001.
Third Parties / Business Partners	Entities and/or organisations not owned or controlled by the Group, or individuals who are part of a (commercial) transaction with the Group or who are otherwise engaged to provide services or goods or take part in commercial activities on behalf of the Group. For example, business partners may include all types of suppliers, retailers, professional service providers (including lawyers and accountants), agents, business sponsorship partners and other third parties working with the Group. Customers (including B2B customers) are not considered partners for the purposes of this Procedure.
Bribery	Offering, promising, providing, accepting or demanding an undue advantage of any value (which may be financial or non-financial), directly or indirectly, and regardless of location, in violation of applicable law, as an incentive or reward for a person to act or omit action in

	connection with the performance of that person's duties, whether in the private or public sector.
Recipients	Members of management and control bodies within the company, all staff members within the Group, Third Parties (e.g. suppliers, subsuppliers, advisors, representatives, business partners, etc.) and anyone collaborating with or acting in the name or on behalf and/or in the interest of the Group.
Facilitation Payments	Payments, commissions or other benefits not provided by law or regulation and which are offered to or requested by private individuals, Public Officials or Persons in Charge of a Public Service for their own personal benefit in order to expedite or facilitate the performance of an ordinary act to which the payer is entitled under law or contract (such as the issuance of a visa or customs clearance).
Public Official	A person exercising a legislative, judicial or administrative public function. This category includes: (i) any elected or appointed official (in the executive, legislative or judicial branch of the Government) associated with public entities of a local, provincial, regional, state or national nature (or any department or agency of such bodies); (ii) any civil servant, part-time government employee, unpaid government employee, or any person who “acts in an official capacity” (or rather who is vested with the power to perform administrative functions by a public body); (iii) any political party, party official or candidate for political office; (iv) any official or employee of an international public organisation, such as, by way of example, the World Bank or the United Nations, or any department or agency of these types of organisations; (v) any

	official, representative or employee of a company controlled or owned by the State or any other public body, even only partially; (vi) any official who performs legislative, judicial or administrative functions.
Person in Charge of a Public Service	Any subject who, in any capacity, provides a public service, or rather "an activity regulated in the same manner as the public function, but in the absence of the powers typical of the latter (such as decision-making, authoritative and certifying powers) and with the exclusion of the performance of simple tasks and the performance of merely material work activities".
Object of Value	Any object that has value for the recipient. This may include: money; transfers of shares, bonds or any property; payment of expenses; provision of services of any kind; gifts; employment opportunities; cancellation of debts; any other transfer of goods, services, tangible or intangible assets for the benefit of the recipient.
Gifts	Any goods and/or services provided free of charge as part of the business activity.
Supervisory Body	An internal body appointed by the Board of Directors of each Group Company, endowed with independent powers of action and control and entrusted with overseeing the operation of and compliance with Model 231 and with updating it.
Hospitality	The provision of reception and entertainment services, such as meals, invitations or tickets to social, entertainment, cultural or sporting events. Hospitality may also include travel and accommodation.
Anti-Bribery Management System (SGPC)	The Anti-Bribery Management System of Wind Tre S.p.A., prepared in accordance

	with ISO 37001:2016, which is an integral part of the Company's internal control system.
Whistleblowing	For the purposes of this Policy, the process implemented by Wind Tre Group companies, in accordance with Italian Legislative Decree no. 24/2023, to report in good faith any case of suspected or actual bribery.

5. KEY STANDARDS

The Recipients of the Anti-Bribery Policy act in accordance with the Group's regulations, organisational system, internal powers, assignments and proxies and are required to comply with current laws and regulations as well as with the principles set out below:

- Traceability: all the activities performed and the corresponding controls must be documented, traced and open to ex-post assessment. The documents produced must be filed and be easily accessible in accordance with applicable laws.
- Segregation of duties and activities: all activities must be managed in accordance with the principle of segregation of responsibilities. The person responsible for carrying out an activity must always be someone other than the person who controls that activity (and/or, where applicable, authorises it). To this end, operations and controls must be adequately segregated. The persons involved in the process are required to promptly report any case of non-compliance with this principle.
- Compliance with the law and with the general regulatory framework: the Anti-Bribery Policy is in accordance with applicable laws and consistent with the internal general regulatory framework consisting, but not only, of: the articles of association of Group companies, the Code of Conduct, Model 231 adopted by Group Companies, the certification standard, the organisational system, the system of powers and assignments, etc.
- Signing authority: signing authority must be suitably formalised, clearly defined and assigned in accordance with the proxy's specific organisational and management responsibilities. Such authority must be exercised within the applicable limits, in terms of either value or subject-matter, and in accordance with company directives and rules as well as applicable laws. It is the primary responsibility of all company managers who, within their remit, prepare the document to be signed and/or propose the document for the proxy's signature, to ensure that the document is lawful and in accordance with this Policy as well as with any other applicable statutory or procedural provision.

- Confidentiality: the Recipients of the Anti-Bribery Policy ensure the confidentiality required by the circumstances of the case with respect to any information acquired in the course of their duties, without prejudice to the transparency of their activities and the disclosure obligations laid down by current law.
- Conflict of Interest: when dealing with counterparties, the Recipients of the Anti-Bribery Policy are required to act according to the highest ethical standards and in full compliance with the Code of Ethics, Model 231 of each Group company and, in general, to duly perform their duties and responsibilities. Any situation or activity that might give rise to an actual or potential conflict of interest with Group companies or that might compromise one's ability to make impartial decisions in the best interests of the Group should be avoided. Any possible conflict of interest must be reported as instructed in company regulations.

6. RECIPIENTS

The Policy applies to and is binding on all company bodies, directors and employees, acting at any level and in any role, as well as to suppliers, advisors, business counterparties and, in general, all Third Parties acting in the name or on behalf of Group companies within the scope of contractual and business relationships.

7. ROLES AND RESPONSIBILITIES

- The Board of Directors of Wind Tre S.p.A. is the Management Body and, in accordance with requirement (5.1.1.) of ISO 37001:2016, must demonstrate leadership and commitment to the Anti-Bribery Management System, ensuring it is incorporated into company processes and strategic decisions. It is ultimately responsible for the implementation and effectiveness of the Anti-Bribery Management System and for approving the Anti-Bribery Policy.

- The Chief Executive Officers of Wind Tre S.p.A. represent Top Management and, in accordance with requirement (5.1.2.) of ISO 37001:2016, must demonstrate leadership and commitment to the Anti-Bribery Management System. Top Management is responsible for implementing and actually enforcing the Anti-Bribery Management System of Wind Tre S.p.A. as well as for reviewing and updating this Policy.

- Wind Tre S.p.A. has set up a specific Anti-Bribery Function entrusted with overseeing and ensuring the implementation and operation of the Anti-Bribery Management System. This Function is vested with specific powers and resources for the effective performance of such role and acts independently to ensure that the Function's impartiality and autonomy are not compromised.

Specifically, the Function is responsible for:

- overseeing the design and implementation of the Anti-Bribery Management System by the organisation;
- providing advice and guidance to staff with regard to the Anti-Bribery Management System and bribery-related issues;
- ensuring that the Anti-Bribery Management System is in accordance with the law;
- duly reporting the results of the Anti-Bribery Management System to the Management Body, Top Management and other functions.

The Anti-Bribery Function is suitably funded and assigned in order to ensure the Function's appropriate expertise, status, authority and independence.

The Function has direct access to the Management Body and to Top Management where any bribery-related issue or suspicion needs to be reported thereto.

Wind Tre S.p.A. actively promotes the constant improvement of the Anti-Bribery Management System by regularly reviewing it.

8. WIND TRE GROUP GENERAL PRINCIPLES OF COMMITMENT 9. COMMUNICATIONS AND TRAINING

Wind Tre Group adopts a zero-tolerance approach toward any form of bribery, interpreted in its broadest sense. Bribery is understood as the promise, offer, request, or acceptance—whether direct or indirect—of money or any other benefit capable of influencing the recipient, with the purpose of inducing, obtaining, or rewarding the performance, facilitation, or omission of a function or activity.

To pursue its values, the Group adopts and expects all Recipients to comply with the principles of control/guidance and the rules of conduct designed to monitor the risk of bribery.

Wind Tre rejects any form of bribery, whether active (offering, promising, or giving) or passive (requesting or accepting), including so-called “facilitating” or “unofficial” payments (Facilitation Payments), as well as the granting or receipt of other benefits—such as material goods, advantages, or any other economic or financial gain—whether involving public officials (public-sector bribery) or occurring in relationships between private parties (private-sector bribery).

Acts aimed at inducing a person to perform conduct contrary to their official duties (proper bribery) or intended to expedite, favor, or otherwise facilitate the handling of routine activities or the adoption of official acts (improper bribery) are likewise prohibited.

Prohibited conduct includes, but not only:

• offering/promising/authorising, or requesting/accepting gifts, objects of value, advantages or other benefits that might be regarded as exceeding normal business

practices or acts of courtesy or that are otherwise aimed at obtaining benefits and/or favourable treatments;

• giving undue incentives to predetermined parties to obtain advantages in any activity connected with the Group;

• making facilitation payments to a Public Official and/or Person in Charge of a Public Service to speed up, favour or, in general, facilitate the performance of a routine act;

• making improper payments, other than for the purchase of goods and services, also by way of any commission, discount, rebate, credit note, indemnity or other commercial incentives to conceal bribes;

• giving or promising direct or indirect contributions to political parties, movements, committees or candidates as well as trade unions.

In addition to this Anti-Bribery Policy, Wind Tre S.p.A. has adopted the following tools which, altogether, make up its internal control system:

- a Code of conduct, which sets out the principles of conduct to be followed by all Group staff and anyone dealing with the Companies within the Group;
- a Model 231 for each Company which includes structured information flows to the Supervisory Body, as well as a disciplinary system, and which defines a set of rules and internal organisational procedures to prevent crime, including bribery;
- a structured system of powers of attorney and proxies consistent with the organisational responsibilities assigned;
- a strengthened system of internal controls, including specific measures to prevent, fight and detect acts of bribery;
- a complex set of internal rules consisting of policies, procedures, operating notes for the management of processes exposed to the risk of bribery;
- a system of segregation of duties with regard to material activities underpinning company operations;
- a system of traceability and ex-post assessment of material activities underpinning company operations;
- a formalised whistleblowing process, involving also IT tools (“whistleblowing platform) that ensure the utmost confidentiality of information and of the whistleblower's identity throughout the reporting process as well as specific forms of protection of the whistleblower against any subsequent retaliation;
- an Anti-Bribery Function engaged in overseeing the implementation and operation of the Anti-Bribery Management System, promoting training, information and communication with regard to the measures taken, the areas for improvement and reporting tools. The Function is also committed to constantly improving the Anti-Bribery Management System, ensuring it is regularly reviewed and thus made more effective;
- a structured system for the constant monitoring and assessment of the results of the Anti-Bribery Management System, which entails the ongoing verification of the

effectiveness of the controls and procedures put in place, regular audits, Top Management reviews, recurrent risk assessment updates as well as the supervision of the Anti-Bribery Function so as to constantly improve the System;

- controls relating to the management of Gifts and acts of Hospitality, setting ceilings for initiatives of modest value previously approved by the Group;
- controls relating to Donations and Sponsorships, aimed at fostering a positive impact in the social and/or environmental context in which the Group operates, maximising opportunities for corporate visibility. Such contributions must be in line with approved budget limits and current laws, intended only for trustworthy and legally incorporated entities, and must be traceable and duly documented, with cash payments or payments to numbered accounts being prohibited. No payments can be made to political parties, discriminatory organisations, trade unions, persons involved in unethical conduct or single individuals. In addition, agreements must be in writing and special caution must be exercised when taking initiatives in the public sector. Donations and Sponsorships are subject to a due diligence process;
- controls in the management of relations with Public Officials or Persons in Charge of a Public Service, establishing channels of communication with institutional stakeholders at both national and international level, in order to represent corporate positions in a transparent, rigorous and correct manner, avoiding collusive attitudes. To this end, contacts with institutional interlocutors take place exclusively through persons expressly authorised by each Group company, in line with the corporate role held and aimed at managing relations with Public Bodies and relevant Authorities, both at local and European level.

9. COMMUNICATIONS AND TRAINING

Wind Tre S.p.A. believes that internal and external communications as well as training are two crucial areas for the effective implementation of its Anti-Bribery Management System. Therefore, the Company undertakes to spread its Anti-Bribery Policy and promote all Recipients' compliance with the principles set out therein.

In this context:

- the adoption of this Anti-Bribery Policy and any updates thereto are communicated to all Group Companies' staff by the Top Management of Wind Tre S.p.A.;
- newly hired staff are required to sign a commitment to comply with the Anti-Bribery Policy, which entails the obligation to examine the document published on the Group's institutional website and comply with it provisions. The document is signed upon execution of the employment letter;

- the commitment to comply with the Anti-Bribery Policy is regularly signed by Group staff exposed to a significant risk of bribery (e.g. proxies);
- the Policy is published on the company intranet and on the Group's institutional website so that it can be made known to external stakeholders too;
- the contents of the Policy are disseminated and specific anti-bribery training is provided during regular training sessions involving the staff of all Group Companies;
- specific clauses are included in agreements with Third Parties with regard to their acceptance of the anti-bribery principles adopted by the Group, establishing also their obligation to report to the Group, where requested, the anti-bribery training provided to their staff.

Training is mainly intended to provide adequate knowledge of the risks, responsibilities and sanctions applied in the event of violations of anti-bribery provisions as well as the principles to be observed and the conduct to be followed.

Anti-bribery training is an integral part of the Group's required training plan.

10. CONTROL SYSTEM RELATING TO THIRD PARTIES

Wind Tre S.p.A. and Group Companies acknowledge the key role of Third Parties in ensuring compliance with the Anti-Bribery Control System and in protecting business integrity. Third-Party management is thus a crucial element of the corporate control system.
Third Parties are required to endorse and comply with the principles and rules set out in this Policy, the Code of Conduct, the Supplier Code of Conduct and internal regulations as well as with current anti-bribery laws and regulations. They must act transparently, fairly and with integrity, undertaking not to put in place or tolerate any direct or indirect act of bribery.
To protect the Group, each company enters specific ethical and anti-bribery clauses into its contracts with Third Parties that require their endorsement of the principles of lawfulness and integrity and entail, where necessary, obligations of collaboration and information, as well as the right of each company to take corrective measures – up to suspension or termination of contract – in case of violations.
Before establishing a relationship with Third Parties and, as the case may be, even throughout such relationship, Third Parties may be subject to anti-bribery due diligence processes proportionate to the level of risk, aimed at assessing their reliability, reputation and compliance with the Anti-Bribery Control System.
Establishing or maintaining a contractual relationship is conditional upon the positive outcome of such controls and to compliance with anti-bribery contractual clauses.
In case of a violation, or reasonable suspicion of a violation, of anti-bribery obligations, Group Companies take the most appropriate measures, including – where necessary – suspension or termination of contract, without prejudice to their obligation to inform the competent internal functions (e.g. the Anti-Bribery Function, Top Management) and, where envisaged, the competent Authorities.

11. WHISTLEBLOWING

The Group encourages anyone, its staff and third parties to report any violation of anti-bribery rules and any other unlawful conduct, even if only potential, defined in the whistleblowing policies adopted by Group Companies, using the whistleblowing channels made available by each company, which are such as to ensure - also using IT tools ("whistleblowing platform") with advanced encryption and technological features - the confidentiality of the whistleblower, the information reported as well as anonymity throughout the whistleblowing management process, as laid down by Italian Legislative Decree 24/2023 and current laws on personal data processing.

The Wind Tre Group does not tolerate any retaliation or act of discrimination against whistleblowers reporting a violation in good faith, with "act of discrimination" meaning any unjustified disciplinary action, workplace harassment, dismissal, change of duties and any other retaliation that has the effect of worsening whistleblowers' working conditions ("no retaliation" policy).

The Recipients of this Policy who, by reason of their duties, become aware of any violation that is relevant hereunder, are required to report it as described in the Group's Whistleblowing Policies, published on the company intranet and on the Group's institutional website, which describe the protection measures in place for anyone reporting a violation in good faith.

12. DISCIPLINARY SYSTEM

The violation of this Anti-Bribery Policy and of its related procedures by its Recipients entails the application of the disciplinary system as defined and reported in the General Section of Model 231 adopted by each Group Company. The General Section of Model 231 is published on the company intranet and on the Group's institutional website.

13. FINAL PROVISIONS

Should the Recipients: (i) have doubts as to the proper interpretation of the provisions of this Policy, (ii) need an opinion on anti-bribery laws and, more generally, on the conduct to be adopted in accordance with the Policy and applicable current laws, they must contact the Anti-Bribery Function of Wind Tre S.p.A. at the following email address: funzioneconformitaanticorruzione@windtre.it

Any violations of this Policy and any conduct, even if only potentially unlawful, put in place in violation of anti-bribery laws must be reported to the Group using the whistleblowing channels made available by each Group company (Cfr. para.10).