



# **Wind Tre Code of Conduct**

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# 1. Our commitment to integrity

The Wind Tre Code of Conduct (hereinafter, the "Code") is a statement of the principles of conduct and ethics to be honoured in the work context. To help us implement our legal and ethical commitments, the Code defines what Wind Tre expects from employees.

## 1.1. Who must honour the Code?

The requirements defined in this Code apply to Wind Tre Italia S.p.A. including its direct and indirect subsidiaries, any joint venture controlled by Wind Tre Italia S.p.A. - hereinafter the "Group" or "Wind Tre"- and consequently all employees (employees, managers and executives), directors and anyone acting on behalf of the Group, regardless of the relationship, even temporary, with which it is bound (hereinafter, the "staff or employees").

The Group aims to work only with third parties (by way of example and not limited to service or work contractors, suppliers of goods and/or products, landlords, consultants, agents and agencies, testimonials, etc.) that follow standards of ethical conduct in line with its own. Employees must not resort to third parties that are known for any conduct contrary to the provisions of this Code.

The Code establishes the principles, the contexts, and the rules to be followed in order to ensure compliance with the laws and ethical values in which the Group believes.

In addition to the Code, the Group has implemented specific policies and procedures to which all employees (and where provided for also third parties) must refer, which define the responsibilities, rules and *compliance* requirements necessary for the management of business processes.

## 1.2. Your personal commitment to do the right thing

This Code is a commitment to do the right thing. By working for Wind Tre, you *agree to support this commitment as follows*:

- read the Code carefully;
- understand the requirements of the Code, the policies and procedures that apply to your work;
- honour the law and the Code, whose observance is also required on the basis of the employee's due diligence towards the employer;
- act according to common sense and even avoiding the appearance of improper conduct;
- report any breaches you become aware of, through the appropriate channels.

In case of doubts regarding a specific conduct, ask yourself:

- is it in line with the Code?
- Is it compliant with the law?
- is it ethical?
- what would others (the people I work with, the community, or my family) think of this action?
- would I like to read about it in the newspaper?
- does it seem right?

**Questions and Answers:**  
You will find questions and answers in some sections when reading the Code. These sections are intended both to answer specific questions that usually arise, and, more generally, to illustrate how specific Code topics apply in real work situations.

Those who do not honour the Code put themselves, other Wind Tre employees and the Group at risk. The Group will not tolerate any conduct that does not comply with the provisions of this Code.

The application of the Code is a priority for the Group. If you're having trouble distinguishing what's right and what's wrong, you can ask the 231 Compliance Department for assistance.

## ***When in doubt, ASK!***

### **1.3. The duties of supervisory staff**

If your position involves the supervision of other people, you have greater responsibility in accordance with the provisions of the Code.

*You should:*

- promote compliance with the rules and business ethics by giving a good example;
- ensure that those who report to you understand the requirements of the Code and comply with them;
- create an environment where people feel comfortable, even when they raise questions or concerns.
- conduct yourself in line with the Code when evaluating staff:
- not to encourage or issue directives to employees or people who work with you to obtain business results in derogation of ethical principles and/or the provisions of the code and/or legal regulations;
- support the person who, in good faith, asks questions or raises doubts.

**The 231 Compliance Department under the direction and coordination of the Compliance Officer has the task of ensuring:**

- compliance with the values, principles and provisions contained in the Code of Conduct and in the procedures associated with it, through control and monitoring activities
- compliance with Legislative Decree 231/01 and anti-corruption, anti-money laundering regulations and in general with legislation that includes ethical business practice principles

If you are asked a question or doubt about this Code, pay attention and address the problem. If necessary, ask for help. If a Wind Tre employee raises a question that may require further investigation under the Code, you must forward it to the relevant corporate departments (as indicated in par. 1.7). The 231 Compliance Department will assist you in handling ethics issues.

### **1.4. Does the Code explain all the standards I need to know?**

The Code establishes the principles of business conduct applicable to the entire Group. It cannot describe every law, regulation or internal requirement applicable to your specific case. Make sure you know the regulations in force for the proper conduct of your work, look for the information you need on the Intranet and pay particular attention to the policies, procedures and documents located in the Intranet Ethics and Conduct area. You can also ask for assistance from your manager or the Compliance Officer and 231 Compliance Department. You should also always use common sense, so that your actions never damage the Group's reputation.

**What to do about laws in different countries?**

Taking into account the international context of which it is an integral part, the Group is subject to the application of local and international regulations. It is therefore best that you fully know and comply with the regulations governing the Group's business.

**The policies, procedures and associated documents relating to the 231 Compliance area in this Code are the Anti-Fraud and Anti-Corruption Policy, the Organisation and Management Model pursuant to Legislative Decree 231/2001 adopted by the Group companies and the related policies and procedures (Gifts & Hospitality Procedure, Conflict of Interest Whistleblowing Policy for W3 Companies and Whistleblowing Policy for Wind Tre Retail S.r.l.; Procedure; Business Partner Due Diligence Procedure; Donations and Sponsorships Procedure; Supplier Code of Conduct, Anti-Fraud and Anti-Corruption Guidelines for Suppliers)**

If you have questions about what rules apply in the performance of your work, you can request support from the Legal & Regulatory Department and/or the 231 Compliance Department.

### 1.5. Whom to ask?

If you are not sure of the appropriate conduct to follow, do not hesitate to ask the Compliance Officer/231 Compliance Department.

### 1.6. Whom to inform?

You must report immediately on:

- **violations**, even potential ones, relating to the offences **falling within the scope of Legislative Decree no. 24/2023**<sup>1</sup>, including but not limited to offences pursuant to Legislative Decree 231/01<sup>2</sup> and violations of Organisation, Management and Control Models pursuant to Legislative Decree no. 231/01, offences affecting areas protected by the EU (such as prevention of money laundering, product safety and compliance, etc.), violations of antitrust regulations, etc.;
- **other violations**, even potential ones, relating to other crimes **not falling within the scope of Legislative Decree no. 24/2023**, such as: violations of the SA8000<sup>3</sup> Standard, violations of other regulations, such as violation of the rules protecting the insurance industry (IVASS Regulations), violations of the Code of Conduct and other internal policies and procedures, cases of corporate fraud, etc.

It may seem easier to keep quiet or look the other way, but the Group's commitment to integrity means that a legal or ethical issue that is against the law or in breach of the principles and provisions of the Code, or generally against the internal regulations, must never be ignored.

**You must report any violation using one of the channels that the Group Company provides, as shown below:**

**For W3 Companies** (Wind Tre Italia S.p.A, Wind Tre S.p.A. and 3Lettronica Industriale S.p.A):

- **Online whistleblowing platform** available in the Documents and Procedures/Ethics and Conduct/Report a potential violation - Whistleblowing on the corporate intranet and on the corporate website [www.windtregroup.it](http://www.windtregroup.it).
- **E-mail: segnalazioniwhistleblowing@windtre.it**
- **verbal reports** can be made to **Audit, 231 Compliance & Risk Management Department**

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<sup>1</sup> **Legislative Decree no. 24/2023** governs the protection of individuals who report violations of European Union and national law

<sup>2</sup> **Legislative Decree no. 231/01** governs on the administrative responsibility of legal persons, companies and associations, including associations that are without legal status

<sup>3</sup> **SA8000** is the international certification standard drafted by the CEPAA and intended to certify Company Social Responsibility

## Wind Tre Retail S.r.l.:

- **Online whistleblowing platform** available in the Documents and Procedures/Ethics and Conduct/Report a potential violation - Whistleblowing on the corporate intranet and on the corporate website [www.windtregroup.it](http://www.windtregroup.it).
- **E-mail:** [segnalazioniwhistleblowingwindtreretail@windtre.it](mailto:segnalazioniwhistleblowingwindtreretail@windtre.it)
- **verbal reports** can be made **to the dedicated Figure specifically appointed by Wind Tre Retail** to manage whistleblower reports pursuant to Legislative Decree no. 24/2023

Reports of violations or fraudulent evasion of the principles and provisions of the Organisation, Management and Control Model pursuant to Legislative Decree no. 231/2001 may also be sent e-mail and/or to the postal address of the Group Company Supervisory Board (for e-mail or postal address, please see the Documents and Procedures/ Ethics and Conduct/ Model 231 section of the intranet or on the corporate website [www.windtregroup.it](http://www.windtregroup.it))

The **Group encourages** anyone, whether employees or third parties, to **report** any potentially **illegal behaviour** as specified above. Whistleblowing reports may be made anonymously, **in good faith** and **without fear of retaliation**, as specified above:

Regardless of the manner in which the report is submitted, the **Group will guarantee the confidentiality** and (if requested) **anonymity** of the **whistleblower**, and will handle all the information relating to the case with the **utmost confidentiality**, and in accordance with the **current laws**.

**For further information on the whistleblowing management system, please consult the W3 Company (Wind Tre Italia S.p.A, Wind Tre S.p.A, 3Lettronica S.p.A) Whistleblowing Policy and/or the Wind Tre Retail S.r.l. Whistleblowing Policy.**

### Online whistleblowing platform

The online platform is a whistleblowing channel managed by an external, independent company. By means of an encryption system and advanced technological characteristics, the company guarantees the **confidentiality of the Whistleblower's identity** and of the information reported and **anonymity** throughout the phases relating to the whistleblowing management process as provided in the **Legislative Decree no 24/2023**.

#### 1.7. No retaliation

Employees who **report in good faith** are complying with this Code and doing the right thing.

The Group **will not tolerate retaliation, threats or acts of discrimination against anyone who submits a whistleblowing report in good faith.**

Any person in the Group who carries out retaliation or acts of revenge against any whistleblower making a report in good faith will be subject to disciplinary action.

If, on the other hand, a Wind Tre employee should make a **report in bad faith** (for example to discredit and/or retaliate against another Wind Tre employee) such conduct will constitute a serious breach of the Code of Conduct.

## **2. Wind Tre staff**

The Group is committed to promoting a safe and professional workplace that fosters teamwork, diversity and trust. This implies the utmost commitment to providing equal employment opportunities for all people working for Wind Tre.

### **2.1. Equal Employment Opportunities and Diversity**

The Group recognises the importance of human capital and the value of employees, guarantees and respects their rights and dignity. Our goal is to create a work environment based on trust and mutual respect, where diversity is considered a value and where there are equal professional opportunities.

The Group promotes and fosters the behaviours and professional skills of each individual, with the awareness that the high professionalism and dedication of our employees are essential factors as well as determining factors for the achievement and attainment of the Group's objectives.

*The basic rules you must follow:*

- make sure your decisions about hiring, recruiting, training, and promoting employees are based on merit, such as quality, demonstrated skills, and goals achieved. Do not allow factors such as ethnicity, religion, gender, age, nationality, sexual orientation, marital status, disability or type of residence permit to influence your judgement. In particular, keep in mind that all people who work have the right to equal treatment and equal employment opportunities and that therefore your decision regarding recruitment and promotions must not be influenced in any way by the factors indicated above;
- set yearly goals, both general and personal, focused on results and based on the need to avoid illicit conduct, and focus on a possible, specific, concrete and measurable result, taking into account the time required for its achievement;
- during the recruitment and hiring process, ask for information strictly related to the verification of the aspects indicated on the professional and psycho-attitudinal profile, respecting the privacy and opinions of the person you are recruiting or hiring;
- adopt appropriate measures to avoid favouritism, nepotism and forms of patronage in the recruitment and hiring phases;
- always comply with all applicable labour and employment laws.

### **2.2. Forced and child labour**

The Group is committed to eliminating all forms of forced and compulsory labour and to the definitive abolition of child labour. Minors or school-aged children will not be hired or employed for any task.

The Group will not work under contracts or supply companies or professionals that do not comply with these standards.

### 2.3. A respectful and harassment-free workplace

We believe in the need to treat each individual with respect and dignity and in the promotion of an atmosphere of open communication, trust and mutual respect. The Group will not tolerate any form of abuse or harassment, in any corporate workplace, towards Wind Tre employees and in general towards third party Group companies or professionals.

The following are understood as such:

- the creation of an intimidating, hostile or isolating environment towards individuals or groups of employees;
- the unwarranted interference with the execution of the work of others;
- obstructing other workers' employment prospects merely for reasons of personal competitiveness.

Remember that harassment is illegal and can lead to serious disciplinary action, including dismissal.

**Harassment** can take different forms. Here are some examples of unethical conduct:

- unwanted approaches or sexual advances
- Exposure or dissemination (even via *social network*) of offensive materials or relating to the privacy of others (for example photos and videos).
- Insults (even concerning nationality, ethnicity, age, gender, religion, marital status or disability).
- Abuse of power or position of authority.
- Any kind of violence in the workplace.

Q: Sometimes my office manager's behaviour makes me uncomfortable: s/he asks me to go out for a drink or, when there is no one around, s/he talks about possible relationships. What should I do?

A: If your manager's behaviour makes you uncomfortable, the best solution is to first set him/her straight. It may be that this person doesn't realise that their behaviour is bothering you. In most cases, talking openly is enough to stop unwanted behaviour. However, if this is not enough or if you do not feel comfortable talking directly to the person in question, you can report the problem to the Compliance Officer and request the support of the Human Resources Department or you can use one of the other reporting channels that the Group makes available to you (for example the "Reporting-Whistleblowing" Web Platform).

**Q:** My supervisor gave me a low grade during the assessment interview. S/he told me that I did not achieve my goals and that s/he would like me to improve my attitude at work, showing more dedication. I agreed that I may have made some sporadic mistakes, but overall I don't think my work was that bad. Can I report this unfair treatment by the supervisor?

**A:** Based on this information, it does not appear that you have been treated unfairly. The supervisor simply does not find your work satisfactory. However, if you disagree with his/her assessment, you can discuss it with the higher level manager. If you do not receive feedback about your situation or do not agree, you can discuss it with Human Resources.

## 2.4. Employee Privacy and Confidentiality

The Group strives to respect its employees' personal data privacy. The Group's policy provides for the acquisition and storage only of the personal data required for the effective management of the employment relationship in line with the provisions of the law in force on the matter. Access to personal data is limited to duly authorised company personnel and those who need to consult this information for needs related their work. The employee's personal data will not be provided to third parties with respect to the Group in the absence of adequate authorisation or regulatory obligations.

**Q:** I stayed late in the office last night. I was going to use the photocopier and I found a small pile of personal documents in the tray. I noticed that the copies contained information on my department's pay slips. They were forms that contained a lot of personal information. I don't want to get anyone in trouble but I don't think it's right to leave this information out in the open for anyone to see. What should I do?

**A:** You should immediately return the sheets to the person responsible for personnel administration or in any case to your/your Human Resources contact person maintaining the confidentiality of the information of which you have become aware. You should also report what happened to the person in charge of your office/department. Protecting confidentiality and privacy is the personal responsibility of each Group employee. By noticing the problem and acting accordingly you are doing the right thing.

## 2.5. Health and safety

The Group is committed to providing all Wind Tre personnel with a safe working environment, where no one is exposed to unnecessary risks. We know that operational safety not only depends on structures and equipment that are perfectly functional from a technical point of view, but also on competent staff and attention to health and safety. No activity is so important that it cannot be carried out safely.

The Group is committed to increasingly encouraging management and employees to substantially comply with the vast legislative framework on occupational safety. In compliance with these legal provisions, the Group has provided specific internal procedures, aimed at preventing the occurrence of accidents at work, which employees are required to comply with to avoid conduct or

actions that may put their own safety and that of others at risk. Personnel with managerial qualifications also have a duty to provide their teams with a safe working environment, raising staff awareness of potential safety risks and their management.

If you become aware of behaviours, situations or activities that are hazardous to health or safety, you must immediately report them directly to the Compliance Officer or use one of the other channels that the Group makes available to you.

## **2.6. Drug and Alcohol Free Workplace**

We do not tolerate the intake of substances or any behaviour under the influence of alcohol or illegal substances in the workplace.

In addition, without prejudice to the general prohibitions on smoking in the workplace, all people at Wind Tre must always take into account those who ask to be protected from contact with so-called “second-hand smoke” in the workplace.

### **3. Customers, Business Partners and Competition**

We believe that working relationships based on mutual trust and collaboration, with benefits for both parties, are essential to our success. We will endeavour to create partnerships by understanding the needs of our customers, companies or professionals in procurement or service provision and business partners in general, behaving in an honest, responsible and fair manner.

#### **3.1. Customer Privacy**

Our customers entrust us with their personal information and we value it. It is our priority to ensure the confidentiality of our customers' personal data and communications. We strictly comply with the regulations in force regarding the protection of privacy and confidentiality and information security.

You may not access, view, use, modify, share or distribute customer information without proper business reasons and without proper authorisation. You should always consult the Head of the Privacy Department regarding issues relating to the protection of customer data/information.

Except as required by the duties of the role you hold, you may not access, listen to, monitor, record, tamper with, disclose or interfere in any customer conversation.

**Consult the person in charge of the Privacy Department for any questions regarding the rules that apply to the protection of customer data.**

#### **3.2. Fair Conduct**

We should always strive to maintain our reputation as reliable and ethical members of our community and industry. We undertake to act in formal and substantial legality, according to the internal rules and procedures in force, with correctness, cooperation and mutual respect, in a fair manner and in compliance with the rules set to protect competition, with all our customers, business partners, companies or professionals in the procurement or provision of services, Wind Tre retailers, with competitors and in general with all Group third parties. If we fail to negotiate, operate or act in good faith, we could seriously damage our reputation and undermine our customers' loyalty. We must not take unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice. Under no circumstances may the pursuit of corporate interests justify unfair conduct contrary to the law in force. We expect all Wind Tre staff to treat their customers and business partners fairly, respect their rights and be fair in their business dealings.

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**Q:** A friend of mine who works in my department asked if I could give him information of his wife's cell phone traffic. He thinks his phone bills are too high. My friend does not have access to the customer database and cannot get this information on his own. Should I help him?

**A:** No. We may only provide personal information to the customer or their legal representative acting on a power of attorney. We must not disclose this information to anyone else, including our friends or people with whom we work.

**Q:** I just joined the Group and used to work for a competitor. I have some privileged information on my previous employer. Should I share this information with my manager?

**A:** No. It's illegal.

### 3.3. Copyright law

Today's innovative technological equipment facilitates the duplication of numerous products, including printed materials, videos, computer software, music, artwork, photographs and other intellectual property. However, while duplicating such products is easy, it could be illegal. The Group complies with all copyright laws and only uses products that it has created itself or that it has legally obtained from authorised parties. Copyright infringement may expose both you and the Group to legal and financial liability. In case of questions on copyright, please consult the Legal Department that manages this legislation.

### 3.4. Competition and Antitrust

Our continued success depends on intense competitiveness, which must always be managed correctly and in full compliance with the law. The Group strictly complies with Antitrust rules that promote and protect free and fair competition.

Laws on competition-proofing. are very complex and violations can result in serious penalties for the Group.

**Consult the Wind Tre Antitrust Compliance Program and engage Regulatory Affairs Department when you are faced with a situation that, in your opinion, could be a problem from an antitrust point of view or if you have doubts and questions regarding competitive topics.**

You must be aware of the prohibition of non-competition agreements when dealing with competitors, both formally and informally, both in a work and social context. This doesn't mean that you can't have contacts with competitors, it simply means that you need to handle this type of contact in compliance with competition rules without exchanging confidential/sensitive information with competitive impact.

Always consults the Regulatory Affairs Department before:

- entering into a joint-venture, merger, acquisition, marketing,
- entering into supply contracts or other types of agreements with competitors;
- entering into exclusive distribution agreements;
- establishing exclusive agreements;
- combining or aggregating different products or services;
- setting “special rates” for specific customers.

### 3.5. Money Laundering

Money laundering is the process by which natural or legal persons attempt to conceal funds derived from criminal activities or otherwise give such funds a lawful appearance. The Group will not tolerate, facilitate or support money laundering.

There are serious criminal and civil penalties for violations of anti-money laundering laws.

*The basic rules are:*

- follow an adequate due diligence procedure to learn about the business and the reputation of potential business partners;
- report suspicious transactions or events in compliance with the procedures adopted by the Group.

#### Possible **red flags** on a **business partner**:

- is reluctant to provide complete information or offers insufficient, false, suspicious information;
- avoids reporting or complying with document retention requirements;
- makes/requests payments in currencies other than those specified in the invoice;
- makes/requests payments to/from an account other than the normal account indicated for the business relationship;
- requests or attempts to make payments for each invoice or group of invoices through multiple checks or bills of exchange;
- makes requests for payments in excess of what is due.
- Make sure you know the rules, procurement policies and tender procedures applicable to your business.

### 3.6. Trade restrictions, export controls

Several countries periodically impose restrictions on exports and other relations with certain nations, natural and legal persons. In case of violation of these laws, serious penalties can be applied: fines, revocation of export licenses and imprisonment.

The list of prohibited countries and restrictions is subject to change. For this reason, if the transfer of goods, technologies or services across international borders is also part of your activities, make sure you are always up to date on the rules in force.

If you have any questions regarding these regulatory requirements, please contact the Legal Department.

### 3.7. Collaboration with retailers, sales agents and suppliers

The natural/legal persons with whom the Group has retail, agency, supply relationships (hereinafter referred to as Group retailers, sales agents and suppliers) play an important role for our business. That is why we must select them carefully, on the basis of merit and with the expectation that our retailers, sales agents and suppliers will always act according to our ethical and behavioural standards.

If your job involves selecting or collaborating with retailers or suppliers, keep the following rules in mind:

- follow the purchasing procedures in force;
- select retailers, sales agents and suppliers using declared and manifest procedures, based on merit, avoiding conflicts of interest, inappropriate gifts or entertainment and any other type of favouritism that could compromise the selection process;
- do not prevent any supplier in line with the required standards from competing to win a supply, adopting objective criteria in the selection, following declared and clear procedures;
- only work with suppliers, retailers and sales agents who comply with applicable legal requirements and who act in a manner consistent with the Group's principles and ethical values defined in this Code;
- always report any deviation from the principles set out in this Code by retailers, sales agents and suppliers to your supervisor;
- attain the full cooperation of suppliers in constantly ensuring the satisfaction of the company in terms of quality, costs and delivery times, living up to customer expectations;
- maintain an open and frank dialogue with suppliers, in line with good business practice.

### 3.8. Conflict of Interest

A “real” or “potential” conflict of interest occurs when an employee's personal interests “are” or “could be” in conflict with his or her ability to carry out his or her job in an objective and clear manner.

We have a duty to act honestly and in the exclusive interest of the Group. In general, we must avoid situations where personal interests conflict, or may potentially conflict, with those of the Group.

Pay particular attention to this issue if you have the responsibility to select or maintain relationships with suppliers, agents or retailers on behalf of the Group.

***If you believe that you may have a conflict of interest, even if only potential, you must promptly report it to your manager, the Compliance Officer/231 Compliance Department and the Human Resources Department, in order to be promptly and adequately managed.***

Failure to disclose a conflict of interest may result in disciplinary action.

A conflict of interest involving a member of the Board of Directors of one of the Group companies must be reported and approved in accordance with the procedures established by the Group or by the Shareholders and the provisions of the Italian Civil Code.

A real or potential conflict involving employees must be managed in accordance with the procedures adopted by the Group.

**Q:** My wife is an employee of a company that has business relations with the Group. I sometimes have contact with that company in my work at the Group. Is that a problem?

**A:** These circumstances must be reported to your manager, to the Compliance Officer/231 Compliance Department and to the Human Resources Department following the provisions of the company procedure on conflict of interest. It is important that all real or potential conflicts are reported in such a way that they are adequately and promptly managed.

***For any questions regarding the situations that could generate a real or potential conflict of interest and the related reporting and management methods, consult the Conflict of Interest Procedure or contact the Compliance Officer/231 Compliance Department directly***

**Q:** A content provider with whom the Group is in business has offered to advise me on the design of such content. At the Group I am responsible for relations with the natural/legal persons who provide content and I know the content requirements. I could therefore do this job better than anyone else. I would like to do it on weekends and in the evening from my personal computer. Can I accept this job offer?

**A:** No. Since you are responsible for maintaining relations with this business partner in the Group, this is clearly a situation of conflict of interest.

### 3.9. Gifts and Hospitality

Gifts and hospitality (understood as coffee breaks lunches/ dinners, invitations to events/conferences) both offered and received are allowed provided they are of modest value, consistent with the Group's business activity, in line with the beneficiaries' codes of conduct/ethics and given solely and exclusively for the purpose of undertaking and maintaining normal business relationships. However, it is important to be very careful when offering or receiving a gift or hospitality because some gifts and entertainment may exert improper influence over a public official or private counterpart in the context of a business relationship, or even give rise to suspicion, thus threatening the Group's image and reputation.

By "improper influence" we mean any conduct or action aimed at influencing the outcome of a decision by a public official or a business transaction, or that offers the company an unfair advantage.

***Pay attention when offering or accepting gifts or hospitality:***

***Gifts or hospitality offered and received must be in line with the following mandatory principles:***

- the gift must be directly linked to a legitimate business purpose and allowed by current legal regulations;
- the gift must not be offered to obtain an improper advantage or to influence acts of public officials;
- the **value** must comply with the ceilings set by the procedures adopted by the Group and by the recipient's codes of conduct, be reasonable and appropriate taking into account the recipient's position and circumstances, as well as the occasion, so as not to raise doubts about good faith or appropriateness and cannot be reasonably misunderstood as a bribe by the recipient or by third parties;
- the **frequency** of gifts or hospitality previously provided to the same recipient must not give an impression of inadequacy and must comply with the provisions of the Group's procedures.

**There are certain cases in which gifts or hospitality are never acceptable, in particular:**

- **gifts in the form of cash or cash equivalents (e.g. gift certificates, cheques, loans, shares or stock options);**
- **gifts or hospitality of an indecent or inappropriate nature or which could damage the integrity or reputation of the Group;**
- **gifts or hospitality that violate any local law or regulation**

Particular caution should be exercised with regard to any relationship with Public Officials and Public Service Officers, whether they are representatives of central or regional governments, public bodies, decentralised administrations or state bodies or companies controlled by other territorial and non-territorial public bodies, as these relationships are often highly restricted by applicable laws and regulations.

**If you have any questions or concerns about gift and hospitality policies, please refer to the Group's Anti-Fraud and Anti-Corruption Policy, Gifts & Hospitality Procedure, or contact the Compliance Officer /231 Compliance Department.**

## 4. Governments and Communities

We are responsible members of our communities and are committed to conducting our business in an ethical, honest and irrefutable manner. We will strive to achieve measurable progress and contribute to the effective independent growth of the communities in which we operate.

### 4.1. Relations with authorities and corruption

The Group's relations with public authorities at local, national, European and international level, including judicial authorities, as well as Public Officials or Public Service Officers, are maintained and managed by each Wind Tre employee, in compliance with the legislation in force and on the basis of the general principles of fairness and loyalty. The Group condemns any type of behaviour aimed at obtaining any type of contribution, fund or other services from public authorities through altered or falsified declarations/documents, or through the omission of information due or, more generally, through fictitious mechanisms or deceptions, including those implemented through computer and electronic systems, aimed at misleading the counterpart.

Every Wind Tre employee or collaborator is called upon to ensure compliance with the allocation of contributions, grants or funding aimed at promoting any initiative, obtained from the State or other public body or from the European Communities, even of a modest value or amount.

The company also condemns any abatement consisting in the alteration of IT or electronic system operations or in unauthorised access to data, information or programs contained therein, aimed at obtaining an unfair profit for the Companies to the detriment of the State.

The Group does not tolerate any form of corruption. The Group's corporate policy provides for compliance with all applicable anti-corruption laws and expects anyone conducting business on its behalf to comply with such laws. Our Anti-Fraud and Anti-Corruption policy applies to both the public and private sectors.

Passive business and trade transactions with a public employee or a Public Official or with private companies wholly or partially owned by a public employee or a Public Official or their immediate family members, or of which a public employee or a Public Official holds an economic interest, may only be initiated after consultation and positive opinion of the Compliance Officer.

In the specific case of a tender with the Public Administration, the Group must operate in compliance with the law and correct business practices.

Please remember that, for the Company, all employees, partners and in general third parties acting

**Corruption** usually provides for the receipt, giving or offering of money, gifts, other benefits or any object of value to business or public counterparts in order to obtain or maintain a commercial advantage or induce or reward the beneficiary to act inappropriately (or where it is inappropriate for the beneficiary to accept the benefit).

**Bribes** often involve cash payments (or the promise of payments), but they can also include other utilities or benefits.

on behalf of the Company, the following conduct is prohibited:

- to give money, gifts, entertainment or anything else of value to any public employee or Public Official, in order to influence their decisions;
- to accept and therefore satisfy requests for money, favours or benefits from natural or legal persons who intend to initiate business relations with the Company and from any member of the Public Administration;
- to induce third parties who are called upon to make statements, not to make statements or to bear false witness before judicial authorities that can be used in a legal proceeding, by any means;
- to examine or propose employment and/or business opportunities that may benefit people who are Civil servants or Public Officials or Persons in Charge of Public Service, in a personal capacity;
- to request or obtain confidential information that may compromise the integrity or reputation of both parties or that violates equal opportunity and public tenders initiated by the Institutions or by Public Officials or Persons in Charge of Public Service;
- to request “*facilitation payments*” (payments aimed at accelerating, facilitating or guaranteeing the performance of a *routine* or other activity within the scope of the duties of public or private entities with which the company interacts).

***The Group is very attentive to the prevention of corrupt and fraudulent phenomena, if you have any doubts about these topics please consult the Anti-Fraud and Anti-Corruption Policy or contact the Compliance Officer/231 Compliance Department directly***

**Q:** It is normal to give Christmas gifts to some government officials, such as a bottle of wine. We do not ask them to do anything illegal for the Group, or to favour us in any way, nor do we intend to influence the activities of such government officials. Can we continue to give these gifts?

**A:** As a general rule, in the case of gifts to institutions or individuals related to the PA, it is always necessary to request prior authorisation from the Compliance Officer, even if the gifts are of modest value.

**Q:** In relation to a project I am working on, a consultant suggested paying a “processing fee” to a certain public official to speed up the issuance of the permit. We are not asking the public official to do something illegal. We just want to speed up the process to meet the project deadline. In addition, the payment would not be made by the Company, it would be made by the consultant. The Company will only have to pay some additional consultancy fees under the consultancy contract. Is this OK?

**A:** No. Payments aimed at “accelerating” or “facilitating” a process are not allowed in the Group. Furthermore, they are illegal in most countries. The Group is highly committed to anti-corruption policies and requires its consultants to comply with laws on corruption and the Group's Anti-Fraud and Anti-Corruption Policy. The consultant's offer represents a serious violation and must be immediately reported to the Compliance Officer.

## 4.2. Political activity

The Group's approach to corporate participation in political life is as follows:

***Our assets may not be used for contributions of any kind to political parties or committees or to candidates or holders of public office.***

Requiring employees to support a political party or candidate during working hours is against our policy. It is also contrary to our policy to reimburse an employee for any political contributions or expenses.

The Group recognises the right of Wind Tre personnel to participate as private citizens in political life in the forms deemed most suitable and appropriate. However, care must be taken and it must be made clear that you are not representing the Group when participating in political life.

*Basic rules to be followed:*

- do not use company time, assets or devices to carry out or support your political activity. Participate in political life during your free time and with your resources;
- always indicate that your opinions and actions are personal and not representative of the Group.

## 4.3. Inspections by Supervisory Authorities

The Group does not refuse, conceal, manipulate or delay the delivery of any information requested by public authorities during their inspections and actively cooperates during any investigations. If during you are contacted by Public Officials responsible for police activities or are asked to provide information in connection with a request or investigation by a government or regulatory authority during work, you must ensure that any information you provide is truthful and accurate. It is also forbidden to ask or make sure that other persons called before the judicial authority do not make statements or bear false witness.

You must immediately contact your office manager and the Legal & Regulatory Department, as

required by the procedures adopted by the Group, before responding to an unusual request for information from a governmental or regulatory authority.

#### 4.4. External communications

External communications with investors, analysts and the media require careful evaluation and a clear understanding of legal and media issues.

Only specifically authorised persons may communicate media, financial analysts and investors on behalf of the Group. All external requests relating to financial, strategic or other information about the Group or any of the Group's companies must be addressed to the External Affairs & Sustainability Department.

*Basic rules to be followed:*

- if you are asked a question about the Group by a journalist or market analyst, address the question to the External Affairs & Sustainability Department;
- statements relating to the Group's current financial position and future financial statements may only be made by duly authorised personnel;
- in the event that you are invited to speak in public on behalf of the Group, it is important to share the material under discussion with the External Affairs & Sustainability Department in advance, in order to evaluate its contents and thus prevent the dissemination of inappropriate information from damaging the Group's image or reputation.

We must all think about the **impact of comments written on the Internet through social networks, public forums, chat rooms and bulletin boards.** Information about the Group, including comments about our future products or services, company performance, operating strategies, financial results on customers or competitors, including in response to false or misleading statements, may not be posted on those forums. This applies whether

#### 4.5. Environment

In addition to full compliance with all legal requirements, we will constantly seek to reduce the impact of our operations on the environment and health through the responsible and conscious use of natural resources, the reduction of waste and emissions, research and technological innovation aimed at creating and promoting products and procedures that are increasingly compatible with the environment. We are committed to complying with current environmental regulations and international standards.

If you become aware of any hazardous environmental conditions, report them to your manager and Human Resources.

## 5. Corporate assets and financial integrity

Our duty to the Group requires us to make the best use of the Group's assets and resources. We have a responsibility, as well as a legal duty, to protect the Group's physical and intellectual property, as well as its assets.

### 5.1. Complete and accurate data, records, reporting and accounting

Recording and communicating information, whether financial or non-financial, in an honest, accurate and objective manner is essential to:

- the Group's credibility and reputation;
- compliance with the Group's legal and regulatory obligations;
- monitoring and controlling our business decisions and actions.

***Falsifying records or keeping unregistered funds and assets is a serious crime. It will not be tolerated by the Group and may result in criminal prosecution and termination of the employment relationship.***

Remember to cooperate fully with internal and external auditors, provide them with accurate and complete information, since hiding information from management, internal or external auditors can result in serious damage to the Group's financial integrity and is therefore strictly prohibited.

All information you record or convey on behalf of the Group must be processed with care and honesty. All records (including accounts and financial statements) must be maintained with a reasonable and adequate level of detail, kept with care and reflect transactions appropriately.

Each individual who collaborates with the Company or third party supplier will be required, always within the scope of their respective positions and duties, to check the accuracy and veracity of the accounting records and to disclose, to those in charge, the errors, omissions and/or falsifications of the same.

It is the duty of each individual involved in the preparation of the Company's financial statements (including third party consultants), also for the purposes of the consolidated financial statements and the explanatory notes, to ensure that the accounting documentation complies with current regulations and that it is prepared according to the principles of correctness, loyalty and truthfulness, complies with accounting standards and is easily traceable and stored according to logical and security criteria.

The Company requires that the inclusion of all items, such as receivables, inventories, equity investments and provisions for risks and charges in the financial statements, derive from unconditional compliance with all applicable rules on the formation and assessment of the financial statements. In particular, the individuals responsible for preparing the year-end balances are required to control or promote the control of all transactions related to the production of these

balances, in order to reduce the possibility of misinterpretation.

*You should never:*

- deliberately add a false or misleading entry to a report, record or expense report;
- falsify an entry;
- sell, transfer or dispose of Group assets without proper documentation and authorisation;
- attempt to influence others to do anything that compromises the Group's accounting records or relationships.

The individuals responsible for financial reporting accuracy have an additional responsibility to ensure that adequate controls are in place in order to obtain true, accurate, complete, objective, consistent, timely and understandable financial and management reports.

If you are aware or suspect that a colleague is falsifying books and records to conceal an unlawful act (e.g. payment not due), you must report the matter to the Compliance Officer/231 Compliance Department.

**Q:** It's the last week of the accounting quarter. The person in charge of my office asked me to adjust the amounts set for the quarter, so s/he asked me to register an unconfirmed sale that will not be finalised before next week. I don't think it will harm anyone, do I have to do what s/he asks?

**A:** No. Costs and revenues must be recorded in the correct accounting period. The sale has not been completed. It would be a misrepresentation and entering it in an earlier period could be a fraud. It is your duty to report this case to the Compliance Officer or the Chief Financial Officer or use one of the other reporting channels that the Group makes available to you.

## **5.2. Limitations on signature powers**

Please note that committing the Group in contractual obligations that go beyond the scope of your authorised signatory powers constitutes a serious violation of the Group's policies and procedures and may threaten the Group's financial integrity.

Before signing any business or transaction documents, you should always make sure that this is allowed by your power of attorney/signatory power.

## **5.3. Document retention**

All documents and/or records created or received in connection with your work must be kept in accordance with applicable rules and regulations, as well as Group policies.

***You must not conceal, alter, falsify, destroy or tamper with Group records or documents.***

If you are in possession of documents relating to a dispute or investigation by the Public Authority, you must retain all records and documents that may be relevant to that dispute or investigation.

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**Q:** The contract with a supplier exceeds the procurement manager's range of power and requires approval from higher levels. My manager has asked me to divide the contract into several contracts each having an amount less than the authorised range. I understand this is a violation of our policy, but I don't want to clash with the person in charge of my office. What should I do?

**A:** You should report the breach to the Compliance Officer or use one of the other reporting channels the Group makes available to you so that appropriate action can be taken. If you do not report, you will also be responsible for violations of the Group's policies.

#### **5.4. Counterfeiting, terrorism and money laundering**

The Group requires compliance with all laws and regulations that may have consequences on the Group's social and financial integrity.

*All personnel are prohibited from:*

- engaging in conduct aimed at illegally using and counterfeiting credit cards, stamp values, coins and banknotes;
- joining associations with terrorist purposes, subversion of the democratic order and, more generally, criminal associations, as well as using the Group's resources to finance activities aimed at these objectives;
- carrying out any operation that may involve money laundering proceeds deriving from criminal or illegal activities.

## 5.5. Protection of the Group's assets

All employees must use common sense to ensure that the Group's assets are not misappropriated or wasted. Such assets include company property, time, information and funds, as well as all individual company devices. The use of work tools such as, for example, land lines, fax machines, photocopiers, PCs, e-mails and other similar equipment is not allowed for personal purposes, unless limited uses that are not detrimental to the work activity or to the detriment of the Company.

***If you become aware of the theft, waste or misuse of Group assets or funds or if you have questions about their proper use, please contact the Compliance Officer or Legal, & Regulatory Department immediately.***

Protect the Group's funds as if they were your own: protect them from abuse, loss, fraud or theft. Group funds means the corporate financial funds that are advanced to you and any business travel and entertainment, purchases or credit cards that may be available to you. Ensure that all requests, vouchers, receipts and invoices are accurate and submitted in a timely manner.

Fraud is very dangerous for the financial stability of the Group and can have a serious impact on the well-being of employees and shareholders.

An act of wilful dishonesty committed for the personal gain or advantage of third parties that harms the company's financial position or reputation is known as "fraud".

The Group does not tolerate any form of fraud. Fraud is not only unethical, it is also illegal and can lead to criminal proceedings against the perpetrator.

### Examples of fraud may include:

- sending false expenses;
- abuse of company assets;
- unauthorised management of an operation for personal advantage;
- falsification/modification of cheques;
- illegitimately changing accounting records or sales figures;
- association with third parties aimed at receiving bribes.

**Q:** One of our retailers narrowly missed the sales target that would have allowed him to receive a bonus. The manager in charge has decided to "round up" the sales results of that retailer to allow them to receive the premium. The manager says that it is one of our most important retailers and that we must pay him the premium in order to maintain good relations with him. Are these actions acceptable, given that you do not derive any personal gain from them?

**A:** No. The intentional increase in sales figures violates this Code and the Group's other financial policies and procedures. If you become aware of similar cases you should immediately report them to the Compliance Officer, or use one of the other reporting channels that the Group makes available to you.

## 5.6. Intellectual Property and Confidential Information

We routinely produce “intellectual property” in the Group meaning non-public ideas of value that we own and that we must protect in the same way that we protect other types of property. Since these ideas represent the product of the Group's work, there are numerous laws that allow the Group to protect such information from the use by external persons.

Always protect and never disclose any confidential intellectual property, significant information not in the public domain and any other confidential information of the Group, except when authorised.

**intellectual property**  
includes:

- patents and know-how;
- copyright;
- commercial and service brands;
- other types of confidential business information such as: sales, marketing, strategies and plans, data on research and technical data, development of new products, software.

In this regard, it is expressly forbidden to publish material or information related or in any way connected to the Group and that may harm its image or competitiveness on websites, social networks, blogs, whether public or personal.

This allows us to take advantage of the benefits of our work and maintain our commitment to third parties. These obligations apply for the duration of your employment and continue after your employment has ended.

Occasionally, we may need to share the Group's intellectual property with people outside the Group, for example in a way that allows third parties to work effectively with us. Even if there is a legitimate reason to share Group-owned information, you must always comply with company information security policies

**Q:** I was recently contacted by a person who was employed by the Group and who worked on my team to ask me to provide them with copies of some materials that we worked on during their employment relationship. I told him I'd let him know. What should I do?

**A:** You must not deliver copies of the material requested for any reason because it is likely to be confidential Group information. Immediately contact the person in charge of your office who must in turn notify the Information Security Department and the Legal & Regulatory Department to assess what actions the Group must take to protect its confidential information and its property.

## 5.7. Digital system use and security

Digital systems and the information processed and stored about them are fundamental to our company. Anyone using the Group's digital systems (employees, contractors, consultants and other persons with temporary access) must ensure that these resources are used appropriately and in line with the relevant data protection and security policies.

*Basic rules to be followed:*

- Computer hardware and software and all digital information on the Group's systems are corporate property. Therefore, use company systems responsibly and for the purposes for which they are made;
- do not install software on a company system, unless you have been duly authorised to do so by receiving the necessary authorisations and instructions.

Except as otherwise provided by applicable law, personal data, information or electronic communications created or stored on Group computers or other electronic means are not private and belong to the Group.

*The following is not permitted for any reason:*

- using the Group's electronic communication systems to transmit without authorisation: confidential data about individuals or the Group, confidential company information and copyrighted and licensed materials;
- voluntarily accessing, storing, sending, posting or publishing: pornographic, sexually explicit or sexually exploitative images or texts; any material that promotes violence, hatred, terrorism or intolerance towards others, any harassing, obscene or offensive material;
- causing network communications security breaches or interruptions;
- disclosing your user ID or password to others or allow the use of your corporate computer or laptop.

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**Q:** I sometimes take my company laptop home to access the internet. I'm going on holiday. My daughter asked me to use my laptop while I'm gone. Is it okay if I give her my login credentials?

**A:** No. Login credentials help keep the Group's information and technology assets safe. You can't divulge your credentials to anyone, not even your closest family members.  
In addition, the company laptop should not be used for personal needs.

**Q:** A friend of mine e-mailed me a chain asking me to forward it to ten other people to support a good cause. Is this OK?

**A:** No. You cannot use work e-mail to forward chain e-mails.

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## **6. Code Administration**

This Code is more than just a set of rules. It is the cornerstone of the Group's compliance and ethics programme and is an important tool in ensuring that the Group meets its legal requirements and promotes a positive and ethical working environment for all Wind Tre personnel. The principles contained in the Code should be applied constantly.

### **6.1. Responsibility**

The 231 Compliance Department is responsible for Code administration, with the supervision of the Chief Executive Officer.

### **6.2. Investigations into potential breaches of the Code**

The Group will seriously investigate any reports of violations of the Code and undertakes to maintain confidentiality and carry out accurate investigations into any suspicions.

The Compliance Officer will coordinate investigations into Code violations, even potential, involving other corporate departments such as, for example, Security, Human Resources or Legal, where appropriate, based on the nature of the report. When necessary and depending on the nature of the violation, the investigative team may request the assistance of any Group employee and is authorised to involve accountants, lawyers or external investigators or other profiles that it deems appropriate.

Employees under investigation for a potential Code violation may be heard prior to any final decision.

### **6.3. Disciplinary actions and sanctions**

The violation of Code principles and provisions is a disciplinary violation and as such may be sanctioned, as provided by applicable law, in consideration of the severity of the committed breach.

Compliance with the Code is a fundamental part of the contractual obligations undertaken by employees and/or entities with which the Group has business relations. Its breach represents a breach of contract, with all legal consequences, including termination of the contract and compensation for damages arising from the breach.

### **6.4. Communication of decisions and investigations relating to the Code**

The 231 Compliance Department periodically communicates all ongoing investigations in relation to the Code and final decisions, including disciplinary actions taken, to the Board of Directors, the Chief Executive Officer, the Supervisory Body and the Shareholder.

### **6.5. Training**

All Wind Tre people will receive adequate training on the Code.

## **6.6. Signature and acceptance**

All newly hired personnel must read the Code, accept its contents and comply with its provisions. All personnel must, in the same way, confirm acceptance and read the Code at the request of the Company. Failure to read the Code or to sign the acceptance form upon hiring does not exempt staff from complying with the Code.

## **6.7. Exceptions**

Exceptions to the provisions of this Code must be approved by the Chief Executive Officer and the Board of Directors. In this case, the approval requests must be sent through the Compliance Department.

## 7. Resources

### 7.1. Compliance Intranet Site

The Group maintains an intranet site for Compliance where a copy of the Code, its policies, procedures and guidelines, training and other documents on ethics and compliance are available.

### 7.2. Policies, procedures and guidelines

The Code does not cover all possible conduct in the workplace. The Group prepares other policies, procedures and guidelines that can provide further assistance on issues covered in the Code or address compliance and ethics issues not directly addressed by the Code. A full list and copies of these policies are available on the Intranet site.

### 7.3. Compliance Officer

The Compliance Officer is available to answer any questions you may have about the Code or related compliance policies and procedures, or to discuss any concerns you may have about potential Code violations.

To contact the Compliance Officer:

- Email: [complianceofficer@windtre.it](mailto:complianceofficer@windtre.it)
- Write to: 231 Compliance Department – Wind Tre S.p.A.
- Via C.G. Viola 48, 00148 Rome
- Largo della Metropolitana 5, 20017 Rho (MI).

### 7.4. Reporting channels

The Group Companies provide their employees who wish to report on:

- **violations**, even potential ones, relating to the types of offences **falling within the scope of Legislative Decree no. 24/2023**<sup>4</sup>, including but not limited to offences pursuant to Legislative Decree 231/2001<sup>5</sup> and violations of Organizational Models; offences affecting areas protected by the EU (such as prevention of money laundering, product safety and compliance, etc.), violations of antitrust regulations, etc.;
- **other violations** relating to other types of crimes **not falling within the scope of Legislative Decree no. 24/2023** such as violations of Standard SA8000<sup>6</sup>.

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<sup>4</sup> **Legislative Decree no. 24/2023** governs the protection of individuals who report violations of European Union and national law

<sup>5</sup> **Legislative Decree no. 231/2001** governs on the administrative responsibility of legal persons, companies and associations, including associations that are without legal status

<sup>6</sup> **SA8000** is the international certification standard drafted by the CEPAA and intended to certify Company Social Responsibility

The **channels** reported below:

**For W3 Companies** (Wind Tre Italia S.p.A, Wind Tre S.p.A. and 3Lettronica Industriale S.p.A):

- **Online whistleblowing platform** available in the Documents and Procedures/Ethics and Conduct/Report a potential violation - Whistleblowing on the corporate intranet and on the corporate website [www.windtregroup.it](http://www.windtregroup.it).
- **E-mail:** [segnalazioniwhistleblowing@windtre.it](mailto:segnalazioniwhistleblowing@windtre.it)
- **verbal reports** can be made to **Audit, 231 Compliance & Risk Management Department**

**Wind Tre Retail S.r.l.:**

- **Online whistleblowing platform** available in the Documents and Procedures/Ethics and Conduct/Report a potential violation - Whistleblowing on the corporate intranet and on the corporate website [www.windtregroup.it](http://www.windtregroup.it).
- **E-mail:** [segnalazioniwhistleblowingwindtreretail@windtre.it](mailto:segnalazioniwhistleblowingwindtreretail@windtre.it)
- **verbal reports** can be made **to the dedicated Figure specifically appointed by Wind Tre Retail** to manage whistleblower reports pursuant to Legislative Decree no. 24/2023

**Reports of violations or fraudulent evasion** of the principles and provisions of the **Organisation, Management and Control Model** pursuant to **Legislative Decree no. 231/2001** may also be sent e-mail and/or to the postal address of the **Group Company Supervisory Board** (for e-mail or postal address, please see the Documents and Procedures/ Ethics and Conduct/ Model 231 section of the intranet or on the corporate website [www.windtregroup.it](http://www.windtregroup.it)).