



Wind Tre Group Anti-Bribery Policy in accordance with UNI ISO 37001

First Issue: Version 1.

Prepared by: Top Management


Approved by the Board of Directors of Wind Tre S.p.A. on December 17, 2025.

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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;

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- 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 3Ietronica 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:

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- 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.

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Anti-Bribery Function (FCPC, from the Italian <i>Funzione di Conformità</i> <i>per la Prevenzione della</i> <i>Corruzione)</i>	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).

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Public Official	<p>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.</p>
Person in Charge of a Public Service	<p>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”.</p>
Object of Value	<p>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.</p>
Gifts	<p>Any goods and/or services provided free of charge as part of the business activity.</p>
Supervisory Body	<p>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.</p>


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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.

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- **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;

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- 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

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;

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- 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;

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- 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 its 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;

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- 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

Wind Tre Group Companies have established a whistleblowing management process in accordance with the regulatory provisions enshrined in Italian Legislative Decree no. 24/2023 on the protection of individuals reporting violations of European Union law and national legislation.

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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).