

## Ethical and Integrity Agreement

1. INWIT S.p.A. ("INWIT" or "Company") is inspired by the following fundamental values and principles of business ethics, in line with the 10 principles of the United Nations Global Compact to which it has adhered and with its Code of Ethics and Policy "Diversity & Inclusion":
  - ✓ promotion and respect for human rights;
  - ✓ combating the infiltration of organized crime.
  - ✓ repudiation of any form of corruption, whether public or private, in implementation of the principle of "zero tolerance";
  - ✓ protection and protection of the environment;
  - ✓ health and safety in the workplace;
  - ✓ prohibition of forced and compulsory labour of all forms of child labour;
  - ✓ promotion of freedom of association and collective bargaining;
  - ✓ promotion of gender equality in its organization and towards its third parties and condemnation of any type of discrimination;
  - ✓ respect for the principle of fair competition.
  
2. Without prejudice to the provisions of the applicable legislation as well as the obligations assumed by the Company also following the granting of public funding, INWIT must extend the adherence of the aforementioned principles to all economic operators who want to be included in the Company's supplier register, acquire and maintain the status of "qualified / accredited supplier", participate in selection procedures or award or award of contracts ("Economic Operator" or "Supplier"), in order to ensure their correct and effective application. The Economic Operator concerned, therefore, acknowledges and accepts that these principles are an integral and substantial part of any relationship with the Company.
  
3. Aware of the responsibilities assumed, the Economic Operator undertakes to:
  - conform its conduct to the principles of loyalty, transparency, accuracy and collaboration in line with the INWIT Code of Ethics;
  - prevent any form of corruption – by not offering, promising or receiving, even in the form of an attempt or solicitation, directly or indirectly – sums of money or any other benefit, in order to obtain, maintain or promise undue advantages in favor of oneself or third parties;
  - not to engage in conduct in violation of the principle of fair competition or otherwise likely to alter – directly or indirectly – the process of qualification or selection of suppliers or the award or award of contracts;
  - promote INWIT's ethical principles and values within its organization and towards its third parties;
  - promote gender equality in its organization and towards its third parties and condemnation of any type of discrimination;
  - report any event that may be contrary to the law or, in any case, distorting the market or competition in the context of the qualification, selection, award or award procedure as well as during the execution of contracts.
  
4. In order to ensure the effective application of the aforementioned principles and prevent corporate crime in line with current legislation, the Economic Operator  
*states:*

- a) to have adopted a Code of Ethics and/or an Organization, Management and Control Model *pursuant* to Legislative Decree 231/01 ("Model 231") or, in any case, compliance programs suitable for preventing the commission of offenses in the company code;

YES  NO  Partially  specify

- b) to have adopted an anti-corruption policy or, in any case, to comply with current legislation on anti-corruption in the public and private sectors and to NOT be the recipient of sanctions in this regard;

YES  NO  Partially  specify

- c) to respect and protect human rights, prohibiting any form of forced, compulsory and child labour and NOT to be sanctioned in this area;

YES  NO  Partially  specify

- d) to comply with the applicable legislation to protect health and safety at work and the environment and NOT to be sanctioned in this area;

YES  NO  Partially  specify

**also states:**

- e) that administrative sanctions have NOT been imposed on the entity pursuant to Legislative Decree 231/01;

YES  NO  specify

- f) that sanctions have NOT been imposed on the entity by the Italian Antitrust Authority and/or the European Commission and/or other Antitrust Authorities, as well as by the Authority for the Protection of Personal Data;

SI  NO  specify

- g) to have ascertained the existence of the requisites of good repute for the legal representative, the members of the administrative and control bodies, the general manager, in accordance with the provisions of applicable legislation in force;

SI  NO  specify

- h) that NO disqualification sanctions have been imposed on the legal representative, directors, statutory auditors, general manager, employer for one or more of the offenses provided in D.lgs. 231/01;

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<sup>1</sup>In the case of foreign companies, the reference must be understood to subjects and roles similar to them pursuant to applicable local legislation (for example directors, managing directors, general managers).

YES  NO  specify

i) that there are NO attempts at mafia infiltration aimed at conditioning the choices and directions of the entrepreneurial or professional activity exercised.

YES  NO  specify

- 6.** Without prejudice to the above, the Economic Operator formally undertakes to:
- a) promptly communicate relevant events pursuant to point 4) that may arise during the registration, qualification, selection, award, assignment process or during the execution of the contractual relationship with INWIT;
  - b) actively collaborate with INWIT in case of violation of commitments by employees or subjects attributable to the Supplier.
- 7.** In relation to the above, the Economic Operator acknowledges that, without prejudice to the applicable legislation, INWIT:
- will not maintain any type of relationship with economic operators who have not signed this document or whose declarations and commitments are not true or, in any case, reticent;
  - will assume, even during the selection, award, assignment or execution of the contractual relationship, any initiative deemed appropriate for the protection of ethical values and principles, in case of non-fulfillment or violation of the commitments undertaken or false or, in any case, reticent declarations. <sup>2</sup>

Place

Data

Name  
or  
Company Stamp

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(Signature of the declarant)

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<sup>2</sup>Including - in the cases and in the manner provided for by company procedures - suspension or revocation of registration, refusal to award contracts, termination, or suspension of the execution of existing contracts, refusal, or revocation of authorization for subcontracting / subcontracting. In particular, in the event of false or reticent declarations, INWIT may terminate the assignment, or the contract already stipulated by means of a specific declaration.