

INWIT

Infrastrutture Wireless Italiane

Policy

Responsible Lobbying

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1. INTRODUCTION

The scope of relations with the Public Administration and political parties represents a sector worthy of attention, often perceived as at risk of undue influences or real or perceived conflicts of interest. Moreover, the absence of national legislation regulating lobbying activities increases the risk that such initiatives may be perceived as aimed at obtaining undue advantages. Conversely, international experience demonstrates that transparent institutional relations activities broaden democratic participation by providing public decision-makers with elements that enhance awareness of the actual needs of different productive sectors and civil society. The complexity of the sector in which the industry Towerco. currently operates necessitates positive, responsible, and constructive engagement with public decision-makers, always in line with the values of ethics, transparency, and integrity.

The term "lobbying" refers to the activity carried out by individual or collective interest groups that undertake a coordinated series of actions aimed at informing the public decision-maker about a specific issue and guiding their understanding. This practice may include promoting certain policies, presenting relevant information, participating in consultations, and communicating with public decision-makers to contribute to the formation of laws, regulations, or public policies. Within the scope of this Policy, lobbying is understood as an action conducted in accordance with ethical principles, transparency, and legality, with the aim of representing the company's interests to public decision-makers and contributing to a fair and informed decision-making process, in accordance with the values and standards defined by the company and the laws of the State.

2. BENEFICIARIES AND SCOPE OF APPLICATION

All employees of INWIT and all those acting on behalf of or in favor of INWIT are called upon to adhere to the principles and provisions contained in this Policy - each within the scope of their respective Departments/Functions/Units and responsibilities, particularly in the case of dealings with institutional representatives.

3. PURPOSE

This Policy aims to define the guidelines governing the company's lobbying activities. Its primary objective is to ensure that such activities are conducted in accordance with the principles of transparency, fairness, and fair collaboration with institutions, as outlined in the Code of Ethics and the Anti-Corruption Policy. This Policy encompasses all stages of the lobbying process, from planning to reporting. It is intended to serve as a clear and unifying guide with the aim of ensuring consistency and alignment with the company's vision and values.

4. REFERENCES

- Knowledge Management Framework version 1 (cod. PL000000002)
- Code of Ethics
- Anti-Corruption Policy
- Stakeholder Engagement Management Policy
- "Corporate Giving, Hospitalities, Sponsorship" Procedure
- Organisational and Management Model pursuant to Italian Legislative Decree 231/2001
- ISO 37001
- Code Corporate Governance

5. DESCRIPTION OF THE RESPONSIBILITY PROCESS

The External Relations, Communication & Sustainability Management, also through the Public Affairs Function, ensures oversight of activities representing the company's position towards stakeholders and national, local, and European institutions. In particular, it is responsible for:

- defining the requirements for conducting lobbying activities, through this Policy;
- in agreement with the General Manager, defining the authorized individuals to represent the Company before the institutions of the countries in which it operates;
- defining the company's institutional positioning and lobbying strategy; reporting meetings with institutional representatives through the corporate stakeholder engagement platform;
- monitoring lobbying activities in accordance with this Policy and collecting operational events that require updates to this document. To this end, an annual report extracted from the corporate stakeholder engagement platform could be provided to the CEO/GM and the BoD;
- reporting any regulatory measures that may harm INWIT and ensuring their management through impact assessment.

Lobbying activities must comply with the following behavioral rules, in full compliance with the principles outlined in the Code of Ethics, the Anti-Corruption Policy, the Stakeholder Engagement Management Policy, and the "Corporate Giving, Hospitalities, Sponsorship" procedure, as well as with the provisions of Model 231. Such actions must also strictly adhere to the laws and regulations in force in the countries where INWIT operates.

Specifically, each company representative is obliged to:

- conduct lobbying activities to pursue lawful purposes, as well as to respect the company's strategic direction. To this end, the activity must be related to the pursuit of overall company objectives and interests, not those of individual employees or shareholders;

- when dealing with public decision-makers, use transparent, lawful, and independent accreditation channels, as well as communication forms that allow the interlocutor to easily and immediately identify both the corporate organization and the represented interest.

In carrying out lobbying activities, INWIT representatives towards institutions undertake to register in the registers of interest representatives, where existing, and to comply with lobbying rules. INWIT is registered in the Register of Interest Representatives of the Chamber of Deputies, the European Transparency Register, and the Transparency Register of the Ministry of Enterprises and Made in Italy.

At last, it is forbidden to:

- exchange gifts, favors, or benefits that could influence the thoughts and behaviors of public decision-makers. Any type of gift, favor, or benefit must fully comply with the "Corporate Giving, Hospitalities, Sponsorship" procedure adopted by INWIT;
- provide contributions, benefits, or other utilities to political parties and trade unions, nor to their representatives or candidates;
- conduct lobbying activities in Italy and any other country where INWIT operates without these being previously evaluated and approved by the External Relations, Communication & Sustainability Management, also with reference to the possible involvement of third-party professionals in support of INWIT's institutional activities in the countries where it operates. It is also emphasized that INWIT does not in any way hinder the private participation of employees and collaborators in political initiatives, nor does INWIT exert any pressure on its employees and collaborators to support political positions/entities of any kind.