



Infrastrutture Wireless Italiane

SUPPLIERS' CODE OF CONDUCT

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INTRODUCTION

INWIT S.p.A. (hereinafter also referred to as "INWIT" or "the Company") is committed to strengthening its sustainable business model by integrating sustainability into its strategy and corporate objectives.

Aware of the economic, environmental and social impact of its activities, collaboration with its supply chain represents an essential element in promoting a culture based on sustainability, ethics, integrity and transparency.

For this purpose, it has adopted the Suppliers' Code of Conduct (hereinafter also referred to as the "Code of Conduct"), setting out the Company's expectations towards to the procurement cycle, in order to ensure it is socially, environmentally and economically sustainable.

The principles and standards stated in this Code of Conduct complement and recall what is already provided for in the Code of Ethics (available on the website) regarding the relations with Suppliers.

THE VISION AND VALUES OF INWIT

INWIT's values originate from our Vision and our Purpose, two cornerstones that explain what drives our actions and the thinking behind the goals we want to achieve and towards which we work with passion and commitment.

INWIT's digital and shared infrastructures represent an opportunity to enable a sustainable development model, where connectivity, advanced services, digital innovation, sustainable management of resources, attention to the needs of the public and the country, greater well-being and equal opportunities, and a lower environmental impact are the cornerstones of a new economic and social development model.

The Vision and Values are summarised in our Code of Ethics and available on INWIT's website.

Our Vision

An increasingly connected and sustainable future

INWIT believes in an increasingly connected and sustainable world, where infrastructures enable connections of people and objects in order to generate long-term value for the community and all stakeholders.

Our Purpose

Sharing connections

INWIT builds and manages shared, digital wireless infrastructures that enable operators and technologies to connect people and objects for the benefit of the communities in which it operates.

Our Values

- **PASSION FOR OUR CLIENTS**

We partner with our clients to build infrastructures and develop innovative solutions to meet their needs and facilitate the sharing of data, services and goods.

Partnership - Reliability - Innovation

- **PASSION FOR OUR PEOPLE**

We value the connections between our people, fostering their inclusion, well-being and development so that we are all involved in and responsible for our successes, with ethics and integrity.

Collaboration - Responsibility - Integration

- **PASSION FOR RESULTS**

We work every day to improve our performance and achieve maximum results for ourselves, customers, communities and all stakeholders with whom we work.

Planning - Care - Simplicity

- **PASSION FOR SUSTAINABILITY**

Ours is a sustainable business that focuses on the environment and the community. We are committed to being enablers of the digital transition by promoting a more equitable and inclusive society, reducing the digital divide and fostering innovation.

Digital - Inclusion - Environment

- **PASSION FOR SUSTAINABLE SUCCESS**

We are committed to an increasingly connected and sustainable world. The passion we put into our customers, people, results and sustainability every day enables us to generate long-term value for the community and all our stakeholders.

RECIPIENTS AND SCOPE

Compliance with the principles and standards laid down in this Code of Conduct represents a duty for all INWIT's Suppliers and, together with the Code of Ethics, entails a necessary condition for the initiation and/or renewal of business relations with the Company.

Each Supplier must ensure, by using all appropriate and effective means of communication, compliance with the prescriptions by its employees, collaborators, subcontractors and, in general, third parties working on their behalf during business relations with INWIT. If new contracts are signed or existing contracts are updated, this Code of Conduct must be shared with all those involved.

PRINCIPLES OF CONDUCT FOR INWIT SUPPLIERS

1. INTEGRITY, ETHICS AND COMPLIANCE

1.1 *Compliance with the law*

INWIT encourages its Suppliers to adopt compliance programmes suitable to preventing the commission of unlawful acts in the corporate context (e.g., the Organisation, Management and Control Model pursuant to legislative decree no. 231/2001).

Each of INWIT's Suppliers undertakes to comply with applicable regional, national and international laws and regulations in a timely manner. In addition, Suppliers must ensure the respect of local regulations of the countries in which they operate or provide services.

1.2 *Anti-corruption and anti-fraud*

INWIT rejects all forms of corruption and adopts a "Zero Corruption" approach. It also promotes the adoption of anti-corruption management systems conforming to international standard ISO 37001 or similar.

Suppliers commit to:

- behave in accordance with the principles of ethics and integrity, and in compliance with the Anti-Corruption Policy adopted by INWIT;
- respect public and private anti-corruption laws and regulations at local, national and international level;
- promptly report any event of bribery, even attempted or suspected, of which it has become aware, as well as any fraudulent conduct by a person inside or outside the Company.

Suppliers are prohibited from :

- offering, promising, receiving (even only in the form of an attempt or request), directly or indirectly, bribe or any other utility, in order to obtain, retain or promise undue advantages for one's own benefit or for the benefit of third parties;
- offering INWIT personnel or anyone performing activities in the name of and/or on behalf of INWIT, gifts or other benefits in order to obtain an advantage or preferential treatment of any kind;
- making the so-called "*facilitating payments*", i.e., payments or other benefits made directly or indirectly to public officials or persons in charge of a public service for the purpose of expediting, favouring and/or ensuring the performance of a lawful and legitimate service within the scope of those persons' duties;
- in general, obtaining undue advantages of any kind through artifice or deception, making false declarations and/or allowing or authorising third parties to do so on their behalf.

1.3 Conflict of interest

INWIT has adopted specific controls and rules for identifying and managing situations of conflict of interest in the main areas relevant to the conduct of its business.

Suppliers undertake to adopt appropriate safeguards and rules for preventing and countering, as well as managing potential or actual conflicts of interest, to ensure the integrity of the value chain.

In addition, Suppliers must promptly notify interested parties in the event of an actual or potential conflict of interest.

1.4 Fair competition and antitrust

The principles of free competition underpin INWIT's corporate culture, representing an integral part of its business.

In this context, our Suppliers commit to conduct their activities in accordance with the principles of competition, fairness and propriety, and in compliance with the relevant laws and regulations.

It is, however, forbidden to:

- resort to unlawful market practices, agreements or collusive practices with competitors, including price fixing, bid-rigging or bid-limitation;
- share information about competitors or about INWIT obtained during the supply relation to obtain improper advantages;

- provide false or inaccurate statements regarding the products and/or services offered or offered by other competitors.

Finally, the Suppliers undertake to operate in compliance with the applicable regulations on economic and financial sanctions.

INWIT demands its Suppliers, in any case, to promptly report any event that may be contrary to the law or distort the market or competition during the qualification, selection, award or contracting process as well as during the execution of contracts.

1.5 Proper management of financial flows

INWIT gives fundamental importance to compliance with administrative-accounting and tax regulations, guaranteeing the completeness and truthfulness of information to the market.

Suppliers are required to carry out their activities in a transparent manner, while ensuring the traceability of financial flows.

In particular, the Supplier is committed to:

- ensure the completeness, truthfulness and accuracy of financial and non-financial reporting;
- comply with applicable national and international regulations on anti-money laundering and terrorist financing;
- use only traceable payment methods;
- refrain from engaging in relations with persons on the Reference Lists published by the Authorities for combating organised crime, terrorism and money laundering.

1.6 Protection of corporate information and personal data

INWIT promotes the protection and confidentiality of company information through the implementation of appropriate technical and organisational measures to prevent unauthorised access, damage or theft.

Suppliers must ensure the confidentiality and protection of information and data acquired or of which they become aware during their relationship with INWIT, with particular reference to privileged or non-publicly disclosed and commercially sensitive information.

INWIT also requires its Suppliers to guarantee that the processing of personal data – both their own and those of third parties – is carried out in compliance with the relevant legislation and with the fundamental rights and freedoms of the persons concerned.

In this context, the Supplier shall:

- allow access only to those directly involved in the execution of the contract;
- only process personal data strictly necessary for the activities and, in any case, respecting the principles of lawfulness, fairness and transparency, purpose limitation, data minimisation, storage limitation, integrity and confidentiality;
- ensure to have adequately trained the persons authorised to process them;
- adopt adequate security measures to prevent unauthorised access, destruction, use or disclosure of personal data or sensitive and confidential information;
- refrain from disseminating, sharing and/or using such information for purposes other than those foreseen (e.g., enabling others to trade in the Company's shares).

Any, even potential, data breaches or security incidents must be reported promptly to the dedicated e-mail address: databreach@inwit.it.

Finally, Suppliers must comply with the legislation in force at the time concerning intellectual property rights.

2. HEALTH, SAFETY AND WORKERS' RIGHTS

2.1 Occupational health and safety

INWIT is committed, on a daily basis, to spreading and consolidating a culture of health and safety at work, developing risk awareness and promoting responsible behaviour.

In this context, in order to minimise the risk of accidents and injuries at work, each Supplier undertakes to:

- operate in compliance with current national and international regulations on health and safety in the workplace and relevant contractual requirements, as well as with INWIT's Management System;
- periodically verify compliance with regulations and contractual requirements by its personnel as well as its suppliers and subcontractors;
- adopt appropriate safety, protection and prevention measures and safeguards to counter accidents, injuries and occupational diseases, in particular by providing its workers with the necessary equipment to work in complete safety;
- plan information, education and training activities tailored to the activities carried out, in order to strengthen workers' awareness of responsible behaviour in the workplace;

- cooperate with INWIT during specific audits or controls conducted by it or appointed Third Parties, as well as in the implementation of any improvement opportunities identified;
- promptly report any accidents and *near misses* of its employees or subcontractors employed at INWIT sites/infrastructures.

In addition, INWIT promotes the adoption of occupational health and safety management systems compliant with the international standard ISO 45001 or similar, in order to assess the level of commitment to ESG issues of its Suppliers and introduced as general sustainability criterion for the evaluation of Suppliers in the tender phase.

2.2 Human and labour rights

INWIT rejects any form of labour exploitation, forced and child labour, in compliance with the provisions of the Italian Constitution, the ILO Conventions and the 10 principles of the Global Compact to which it adheres.

Suppliers are, therefore, required to:

- ensure working conditions that comply with applicable regulations, as well as with collective agreements and ILO conventions on working time, remuneration, holidays and overtime;
- define and offer their employees decent working conditions and fair wages, including overtime pay;
- respect and protect human rights, refraining from any form of forced, compulsory and child labour or other forms of slavery, including human trafficking;
- ensure respect for the freedoms of association and collective bargaining, while promoting continuous dialogue with workers' representatives.

Moreover, INWIT promotes a business model that is inclusive and oriented towards valuing diversity, through initiatives aimed at supporting respect for the rights and dignity of its people.

For this purpose, the Company expects its Suppliers to:

- promote inclusion and equal opportunities at all company levels and at all stages of the employment relationship, respecting cultural and individual diversity;
- ensure a working environment free from any form of harassment or violence (e.g., physical/psychological/verbal abuse, mobbing, etc.);

Finally, Suppliers, also as part of the sustainability criteria for tender evaluation, are encouraged to:

- implement a disciplinary system for dealing with unlawful conduct by employees (e.g., unjustified absences, discriminatory behaviour);
- provide means for employees to raise workplace issues or appeal a disciplinary decision;
- adopt policies and/or procedures on diversity, inclusion and gender equality (e.g., UNI PDR 125).

3. ENVIRONMENT

3.1 *Environmental compliance and protection*

INWIT promotes respect for and protection of the environment and biodiversity throughout the supply chain and expects the same commitment from its Suppliers.

Each Supplier is required to operate in full compliance with applicable and current environmental laws and regulations, as well as with the requirements of INWIT's Environmental Management System.

In particular, the Supplier acknowledges that it is necessary to:

- obtain and maintain the environmental authorisations required to perform its activities;
- conduct its activities in a sustainable manner, reducing impacts on the communities and ecosystems in which it operates;
- adopt appropriate measures and safeguards for the protection and preservation of the environment in terms of responsible and efficient use of resources, reduction of energy consumption and emissions;
- periodically check compliance with regulations and contractual requirements by its staff as well as its suppliers and subcontractors, with a view to prevention and continuous improvement;
- cooperate with INWIT during specific audits or controls conducted by it or appointed Third Parties, as well as in the implementation of any improvement opportunities identified;
- participate in training initiatives promoted by INWIT.

Furthermore, INWIT also promotes, as one of the sustainability criteria taken into account when purchasing through a competitive procedure:

- the adoption of environmental management systems conforming to international standard ISO 14001 or similar (e.g. EMAS);
- the setting of CO2 emission reduction targets.

3.2 Waste Management

INWIT has adopted a waste management process aimed at increasing efficiency in the use of resources and maximising the recovery and recycling of waste materials linked to its activities.

For this purpose, Suppliers undertake to:

- comply with current waste management laws and regulations, with particular reference to the safe use of chemical substances or products and hazardous materials;
- obtain and maintain the necessary permits for the treatment, transport and destination of waste generated throughout the supply chain.

IMPLEMENTATION AND MONITORING

Compliance with the provisions contained in the INWIT's Suppliers' Code of Conduct represents a binding condition, as an attachment to all contracts concluded with Suppliers.

At the qualification stage, every new Supplier must read the Code of Conduct, together with INWIT's Code of Ethics.

INWIT periodically reviews the contents and application methods of its Suppliers' Code of Conduct, also following any suggestions, regulatory developments or application of best practices. In case of updates, the Company shall promptly notify the Suppliers for their acknowledgement.

MONITORING AND REMEDIAL MEASURES

INWIT reserves the right to verify, also through Third Parties, the compliance of its Suppliers and their subcontractors with the provisions contained in the Code of Conduct.

In this context, Suppliers (and subcontractors, if any) are committed to actively cooperate with the persons in charge of performing such audits, facilitating access to the requested information or documents and/or to their own sites/offices or those of their subcontractors, in case of on-site audits.

If non-conformities are found during the audit, the Supplier undertakes to collaborate in the definition of an Action Plan and, therefore, to implement the agreed corrective actions, also respecting the established timeline.

In the event of serious or repeated violations of the Code of Conduct or failure to implement the defined Action Plan, INWIT reserves the right to terminate the contractual relationship and/or interrupt existing business relations, as well as to claim compensation and/or apply penalties if the conditions are met. Such measures may also be taken in case of refusal or non-cooperation during verification/audit activities.

REPORTS OF VIOLATIONS

It is possible to report any violations, even suspected, of this Code of Conduct or of the applicable regulations.

As described in the *"Whistleblowing Policy"* available on INWIT's website, reports can be sent

- via the web portal at <https://inwit.segnalazioni.net/>;
- in writing to the attention of the Internal Audit Director or the Head of Risk, Compliance & Corporate Security, at the address *"Infrastrutture Wireless Italiane S.p.A., Largo Donegani 2 - 20121 Milan"*;
- by means of a verbal communication issued to the Internal Audit Director or the Head of Risk, Compliance & Corporate Security (e.g., by private meeting or telephone call) or by using the voice messaging functionality of the whistleblowing portal, whether anonymous or not.

The above-mentioned reporting modes aim to ensure the utmost confidentiality of the identity of whistleblowers and other persons involved in the report to avoid retaliation or any other form of discrimination.