

WHISTLEBLOWING

Process owner:

Alessandro Pirovano

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WHISTLEBLOWING POLICY

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RECORD OF AMENDMENTS

# rev	Description	Issue Date
1	First release	19.12.2019
2	Updating of the process in line with current legislation and organisational and governance structure	20.10.2020
3	Updating of the process in line with current legislation and organisational and governance structure	29.09.2022
4	Updating of the process in line with current legislation and organisational and governance structure	03.08.2023
5	Policy Extended to Group Companies (Affiliates)	16.06.2025

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INTRODUCTION

As part of its daily operations, INWIT Group consistently strives to uphold ethical and governance principles that align with the highest international standards. Therefore, the Company has a firm requirement for ethical and professional integrity. They expect employees to exhibit proper behaviour, comply with laws and regulations, and demonstrate principles of honesty, reliability, impartiality, loyalty, transparency, fairness, and good faith in all their undertakings.

In light of this, INWIT Group has put in place a whistleblowing system designed to:

- prevent, detect and combat unlawful conduct;
- protect the Company and its shareholders from economic and reputational damage;
- disseminate a culture based on ethical and governance principles (e.g. ethics, legality, honesty, transparency);
- strengthen its Internal Control and Risk Management System.

“Whistleblowing” means any report that raises concerns about possible violations, unlawful or irregular conduct or behaviour, including omissions, which fail to comply with national or European Union regulations, thereby potentially harming the public interest or undermining the integrity of the Company. This also includes violations of existing rules and procedures, such as the Code of Ethics and Conduct, and the Organisation and Management Model pursuant to Italian Legislative Decree No. 231/01.

INWIT Group assures protection of the Whistleblower, of the Reported Person and of any further persons involved in the report (e.g. “facilitators”, family members, colleagues, etc.) in accordance with applicable legislation, including EU legislation.

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1. RECIPIENTS AND SCOPE OF APPLICATION

INWIT has defined a Group Whistleblowing policy applicable to Group Companies. The rules and principles contained therein apply to the Chief Executive Officer/General Manager, the Management, the members of the Corporate and Control Bodies and the staff of INWIT and the subsidiaries it controls. In additions it applies to third parties (such as customers, partners, suppliers and consultants) who possess information, whether actual or alleged, regarding violations of national or European laws and/or the system of rules and procedures in force, of which they have become aware within the context of their work.

2. PURPOSE

The purpose of this Policy is to provide guidelines for the process of transmitting, receiving, managing and filing reports, even when they are submitted anonymously.

This document aims to:

- identify the persons who may make reports;
- define the scope of conduct, circumstances and actions that can be reported;
- identify the roles and responsibilities, as well as the principles and general rules governing the process, including the procedures for managing the investigation and the protection of the Whistleblower and the Reported Person, in compliance with the legislation on the protection of personal data.

Furthermore, the Policy aims to promote and facilitate whistleblowing, while also reducing the risks associated with crimes and/or offences. It seeks to build and strengthen the relationship of trust with the various stakeholders and foster and reinforce a culture built upon ethical principles, good governance and corporate compliance.

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2.1 Reportable issues

Reports may concern any conduct, whether active or omissive, carried out by persons inside or outside the Company in breach of the principles and rules of corporate conduct, of policies, procedures or other internal rules adopted, and in breach of applicable legal obligations, including EU law.

Merely as an example, the following may be reported:

1. Alleged irregularities, violations of national and EU laws or regulations, the provisions of the Code of Ethics and Conduct, internal procedures or company regulations (e.g. non-compliance with contractual clauses, defamation, corruption, threats, fraud, improper use of company equipment, falsification of attendance, mobbing and harassment in the workplace);
2. alleged breaches of the Model 231 following conduct risking crime and/or offences provided for by the Model 231;
3. existence of relations with natural or legal persons belonging to criminal organisations of any nature or acting in violation of the principles of legality in contrast with the Code of Ethics and Conduct adopted by INWIT;
4. situations of conflict of interest or where there is evidence of abuse by a person of the power entrusted to him/her in order to obtain personal advantages;
5. complaints regarding accounting, internal accounting control or auditing matters, and the reporting of concerns regarding the same questionable accounting or auditing matters;
6. disclosure of information that by its nature or by explicit indication of the law or company provisions is confidential;
7. violations of Market Abuse rules, such as unlawful disclosure of inside information and market manipulation, as well as other irregularities in investment activities;

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8. alleged breaches of anti-competitive regulations and the Antitrust Compliance Programme adopted by INWIT¹;
9. actions or omissions that result in harm or danger to human rights, the environment, public health, safety and the public interest;
10. alleged breaches of the Diversity & Inclusion Policy.

Any request for clarification on the propriety of one's own or others' conduct for the purposes of full compliance with ethical and governance principles may be made through the reporting channels provided for in this Policy (see paragraph 5.2.2).

The following are excluded from this Policy:

- suspicions or rumours, disputes, claims or requests of a personal nature from the Whistleblower or the person lodging a complaint with the judicial authority that relate exclusively to his or her individual working relations, or are inherent to his or her working relations with hierarchically superior figures;
- reports of national security breaches, as well as breaches of contracts relating to defence or national security aspects, unless these aspects are covered by relevant secondary EU law.

The Report must not take an insulting tone or contain personal insults or moral judgements designed to offend or harm the personal and/or professional honour and/or decorum of the person(s) reported.

Therefore, reports that are made in "bad faith", that contain insulting, offensive, defamatory, slanderous or discriminatory content may expose the Whistleblower to civil and/or criminal liability or disciplinary measures in response to such reports.

¹ Applicable to subsidiaries if Policy or Procedures have been adopted

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REFERENCES

- Regulation 2016/679/EU (General Data Protection Regulation – GDPR)
- European Directive 1937/2019 on the protection of persons who report breaches of Union law
- Law no. 179 of 30 November 2017 “Provisions for the protection of those who report offences or irregularities they gain knowledge of within the context of a public or private employment relationship”, as amended.
- Italian Legislative Decree No. 24 of 10 March 2023 “implementing 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 laying down provisions concerning the protection of persons who report breaches of national laws”, as amended.
- ANAC – Guidelines on the protection of persons who report breaches of Union law and on the protection of persons who report breaches of national law. Procedures on submitting and managing external reports (approved with Resolution no. 311 of 12 July 2023)
- Knowledge Management Framework
- Organisation and Management Model pursuant to Italian Legislative Decree 231/2001 and Code of Ethics and Conduct
- Antitrust Compliance Programme
- Data Protection Organisational Model
- Diversity & Inclusion Policy
- Anti-Corruption Policy
- Management of Conflicts of Interest Procedure

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3. DESCRIPTION OF THE PROCESS AND RESPONSIBILITIES

3.1 Parties involved

3.1.1 Whistleblowers

The report may be submitted by anyone, whether inside or outside the Company, as identified by the legislation in force.

Internal parties include, but are not limited to:

- employees of INWIT Group;
- members of Company and Control Bodies;
- paid and unpaid trainees and any volunteers working at INWIT Group.

External parties include, but are not limited to:

- customers;
- shareholders;
- freelancers, suppliers, consultants, partners, intermediaries, who provide their services to the Company;
- persons working under the supervision and direction of contractors, subcontractors and suppliers.

3.1.2 Reported persons

Reports may concern Top Management, Management, members of the Company and Control Bodies, employees, as well as business partners, suppliers, consultants, intermediaries and all those who maintain and/or have maintained relations with the Company for various reasons.

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3.1.3 Addressees of internal reports

The responsibility for receiving and handling reports rests with INWIT Group's Internal Audit department, which operates as an autonomous and organisationally independent unit.

This function also coordinates the "Triage Team" (hereinafter also referred to as the "Team"), consisting of the Internal Audit department and the Legal Operation & Corporate Security, as well as representatives from all other corporate department identified from time to time, for the operational management of reports.

The Board of Auditors and the Supervisory Board shall be promptly informed of the receipt of a report and its content.

3.2 Contents and reporting channels

3.2.1 Contents of the report

To ensure a thorough and prompt analysis of the report, it is essential that the report includes relevant information that can help substantiate the facts being reported. These elements may include:

- **Subject:** clear and comprehensive description of the reported facts, including the reference period and the location where the alleged acts or omissions took place;
- **Reported Person:** an indication of the persons, both inside and outside of the Company, deemed to be involved, together with their role or any other information (department/position) that may aid in easily identifying them.

The Whistleblower may also indicate further elements, such as, by way of example:

- personal details and/or contact details in order to facilitate the transmission of feedback and any requests for clarification, if they do not wish to be anonymous;

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- an indication of any documents that may confirm the facts reported;
- any other information that may facilitate the gathering of evidence on what has been reported.

Where the Whistleblower is uncertain about the occurrence of the reported facts or the identity of the person involved, it is necessary that:

- the report is supported by detailed and consistent factual information that indicates a reasonable possibility of the reported incident taking place;
- in the light of the circumstances and the information available to him/her, the Whistleblower has reasonable grounds to believe that the facts reported are true or has direct or otherwise sufficient knowledge of such facts.

3.2.2 Reporting channels

Reports may be sent:

- via the computer portal <https://gruppoinwit.segnalazioni.net/> (hereinafter also referred to as the "WB Portal");
- in writing to the attention of the Internal Audit Director or the Head of LO&CS, at the address "Infrastrutture Wireless Italiane S.p.A., Via Gaetano Negri 2 - 20121 Milan".
- orally by means of a verbal communication issued to the Head of Internal Audit or the R&C Manager (e.g. by private meeting or telephone call) or by using the voice messaging functionality of the WB portal, whether anonymously or not.

In order to ensure compliance with regulations in force, INWIT Group has implemented a special IT channel to receive, manage and file reports, available on the Company intranet and website. The system's functionality guarantees the anonymity of the Whistleblower.

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Access to the WB portal is granted as follows:

- the Head of Internal Audit, the R&C Manager and the designated members of the Whistleblowing Team have access for the operational management of the reports;
- only members of the Supervisory Board and the Board of Statutory Auditors have access for the purpose of information and monitoring of the progress of the reports.

If reports or complaints pursuant to Article 2408 of the Italian Civil Code should be received through the aforementioned channels, the Board of Statutory Auditors will proceed in accordance with legislation in force at that time. Moreover, in the event that the Supervisory Board directly receives reports pursuant to Italian Legislative Decree 231/01, the latter may proceed to independently handle the investigation. Both the Board of Auditors and the Supervisory Board may decide to make use of the support of the Whistleblowing Team.

Reports received, whether verbally (in person or by telephone) or in writing (external or internal mail, e-mail), must be promptly entered on the IT portal by the recipient.

For reports received by post, the letter and its envelope must be enclosed with the report.

If the report is received, in written or oral form, from persons other than the addressees envisaged by this Policy, the latter must promptly inform and/or forward the information/material obtained to the Head of Internal Audit or to Head of LO&CS, for the purpose of entering the report on the portal and filing it in a special protected environment.

Under no circumstances may the person receiving a report retain a copy of the relevant documentation; and he/she must refrain from communicating or disclosing its information by any means whatsoever, and from taking any autonomous analysis and/or investigation actions. Failure to notify a report received is a breach of this Policy and of the Code of Ethics and Conduct. It may lead to application of the resulting sanction in accordance with the disciplinary system provisions (see Articles 46, 47 and 48 of the CCNL TLC (national

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collective employment agreement for the telecommunications sector) in force for non-managerial staff and appropriate measures consistent with the regulations in force for managerial staff.

Pursuant to the provisions of Italian Legislative Decree 24/2023, the Whistleblower may also submit reports through the online reporting channel established and set up by the National Anticorruption Authority (ANAC).

3.3 Whistleblowing management

3.3.1 Receipt and assessment of reports

New reports are received by the so-called 'Gate Keepers', i.e. Head of Internal Audit and Head of LO&CS. If the report concerns the Head of Internal Audit or the Head of LO&CS, the system provides for an automatic exclusion mechanism for the person possibly involved and the possibility of forwarding the report to the Board of Statutory Auditors and the Supervisory Board.

Within seven days of the receipt of the report, an acknowledgement of receipt is sent to the Whistleblower by the Gate Keepers, except in cases where the report is received anonymously/without contact details and through channels other than the WB Portal.

Furthermore, upon receipt/entering of a new report, the Board of Statutory Auditors and the Supervisory Board are promptly notified through the WB Portal, unless their respective members are involved in the report.

The Gate Keepers then identify the Triage Team in order to assess whether the report is well-founded and whether there is sufficient evidence to investigate the report.

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In particular, if the report does not turn out to be adequately substantiated, the Team may request further details from the Whistleblower, as set out below:

- if the Whistleblower has provided contact details (e.g. e-mail, telephone, etc.), through that contact;
- in the case of a report received through the WB portal, through the management and messaging mechanism of that system.

Should the report prove to be manifestly unfounded and/or inadequately substantiated, the Whistleblowing Team shall give prompt feedback to the Whistleblower and, at the same time, file the report with the appropriate reasons, informing the Board of Statutory Auditors and the Supervisory Board. Where, on the other hand, the report is not manifestly unfounded, the Team shall proceed with due diligence.

3.3.2 Carrying out of verifications

The purpose of verification activities is to objectively determine the accuracy of the reported facts. These activities are conducted in a confidential, accurate and impartial manner, ensuring the confidentiality of both the Whistleblower and the individual being reported. In particular, the Triage Team will:

- a) perform the necessary analysis targeted at the cases reported;
- b) involving, where appropriate and always guaranteeing the confidentiality and protection of the persons involved, the corporate departments responsible based on the report subject;
- c) use, if necessary, professional parties from outside the Company;
- d) interview the reported person, if deemed appropriate, in relation to the outcome of the preliminary verifications, always taking into account the provisions on the protection of the confidentiality of the identity of the Whistleblower;

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- e) request any clarifications from the Whistleblower;
- f) activate, where deemed necessary, specific protection of the Whistleblower through a formal communication to the Company CEO.

Upon completion of the verification activities, if the reports are found to be substantiated, the Team will provide recommendations or propose corrective actions that are deemed appropriate to address any organisational or control gaps. Corrective actions related to improving the Internal Control and Risk Management System are monitored by the Internal Audit Department.

In order to monitor the management of the investigation by the Board of Statutory Auditors and the Supervisory Board, the WB portal provides for statuses associated with each report (e.g. "unread", "in progress"). The prerogatives of the Board of Auditors and of the Supervisory Board, for their respective areas of competence, to request the Whistleblowing Team to carry out specific investigations remain unchanged.

In addition, the Whistleblower can monitor the progress of his or her report:

- via the WB portal, as described above, in cases where it is received via the latter;
- through regular updates from the Whistleblowing Team to the indicated contact in the case of non-anonymous reports received through the other internal reporting channels provided.

3.3.3 Sharing whistleblowing outcomes

After the checks have been conducted, the Triage Team initiates an initial discussion with the CEO regarding the analyses, evidence, corrective actions and any fine-tuning that may be required. Where the report concerns the General Manager or the Department Head, that person will be excluded from the process of sharing the results of the report.

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Subsequently, the Team proceeds with the preparation of the final report and shares it with the Board of Auditors and the Supervisory Board to assess the results of the analysis. The Whistleblowing Team, following the above-mentioned sharing, takes up any recommendations received and/or carries out further investigative activities.

If the report concerns material facts², the Team promptly shares the final report with the Control and Risk Committee and the Board of Directors for evaluation before concluding the investigation. This allows for the consideration of any recommendations and/or the possibility of conducting further investigative activities.

3.3.4 Closure of the investigation and its outcome

Once the results of the investigation have been shared, the Whistleblowing Team files the report, sharing the final report with the Board of Statutory Auditors, the Supervisory Board, the Control and Risk Committee and the Board of Directors, for their respective areas of competence. Furthermore, the Whistleblower will receive notification within three months from the date of sending the acknowledgement of receipt of the report. It is important to note that in some cases, extensions to this timeframe may be necessary. The Whistleblower will be promptly informed about any such extensions, with a clear explanation provided based on the specific circumstances of the case and the complexity or nature of the reported subject matter. For example, extensions may occur when dealing with lengthy investigations.

3.3.5 Reporting

The Whistleblowing Team provides quarterly:

² By way of example, the term "material fact" is understood to mean: (i) the Reported person belongs to the Top Management, Management or the Company and Control Bodies; (ii) the subject of the report relates to financial fraud, corruption, discriminatory phenomena and acts such as harassment in the workplace, mobbing, etc.

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- to the Board of Auditors and the Supervisory Board, a report on the status of the reports received;
- to the Board of Directors, the Control and Risk Committee and the CEO, a report summarising all the reports received during the period of reference. Report to be shared with Risk and Control C.tee (Limited to INWIT)

3.3.6 Monitoring of corrective actions

If a corrective action plan has been established to address identified critical issues, the Internal Audit department oversees the implementation of the plan.

3.3.7 Traceability and archiving

All documentation pertaining to each received report, including supporting documents, is securely retained for the duration required to carry out activities related to the management of the received reports. The retention period adheres to confidentiality requirements and abides by the maximum time limits specified in the relevant whistleblowing legislation currently in effect.

The original documents of reports received in paper form are stored in a secure environment.

For further information, please refer to the information on the processing of personal data available on the WB portal.

3.3.8 Communication, training and information

The LO&CS department, in coordination with the Internal Audit department, is responsible for implementing ongoing information and training initiatives. These actions aim to educate the entire corporate population on whistleblowing management, emphasising

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the importance of the process, the tools available and the safeguards and protections provided to both Whistleblowers and Reported Persons.

4. PROTECTION OF THE WHISTLEBLOWER, THE REPORTED PERSON AND THE PERSONS INVOLVED

INWIT intends to strengthen the relationship of trust between the Company and its various stakeholders. To this end, in implementation of the legislation in force, the Company takes all appropriate measures to ensure the confidentiality of the identity of the Whistleblower, the Reported Person and any persons involved in the report, as well as of the facts reported.

The identity of the Whistleblower, including any other information from which the same may be identified directly or indirectly, may not be disclosed, except in cases permitted by law. During investigations, the confidentiality of the persons involved in the report is also protected.

The Whistleblower benefits from protection on condition that:

- a) he/she had reasonable grounds to believe that the information reported was true at the time of the report and that the information was covered by the Policy and applicable law;
- b) he/she reported using the channels established for that purpose.

The report management system guarantees, at each stage, the confidentiality of report content, of the persons involved and of the identity of the Whistleblower and the Person Reported, including by using encrypted communications, except in cases where:

- anonymity is not enforceable by law (e.g. criminal investigations, inspections by supervisory bodies, etc.);

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- the report reveals facts that, although outside the company sphere, make it necessary to report them to the judicial authorities.

In any case, the identity of the Whistleblower must not be disclosed to anyone who is not part of authorised personnel responsible for receiving or following up on reports. The Whistleblower's identity may only be disclosed if it is a necessary, proportionate obligation imposed by law. In those cases, the Whistleblower is notified in advance, unless this would prejudice the judicial activity.

Breach of the confidentiality obligation is a source of disciplinary liability in addition to any sanctions provided for by law.

More specifically, if in connection with the report transmission method or its content, the Whistleblower in good faith may be identified and is an employee of the Company, all suitable measures must be taken to prevent his/her action from resulting in any direct or indirect retaliation or discrimination, for reasons directly or indirectly tied to the report.

Retaliatory or discriminatory acts, whether direct or indirect, against those reporting under this Policy, for reasons directly or indirectly linked to the report, are prohibited. In addition, the performance of the above acts by employees, in the cases provided for by law, may be reported to the Italian National Labour Inspectorate.

If an employee believes they have experienced any of the aforementioned conduct as a consequence of making a report, they should promptly notify the Gate Keepers who will address this report, if any, to the HR function or in any case to the Chief Executive Officer for the assessment of the case and the possible initiation of disciplinary proceedings against the perpetrator of the discriminatory or retaliatory behaviour through the channels outlined in this Policy.

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For the consequences of any retaliatory and/or discriminatory acts, whether direct or indirect, committed against the Whistleblower-employee for reasons connected, even indirectly, to the report, and to regulate the sanctions that may be adopted against those who breach the Whistleblower protection measures or those who make reports that turn out to be unfounded, with malicious intent or gross negligence, please refer to the Organisational Model 231 and the applicable disciplinary system.

The aforementioned protection measures are also recognised in respect of the following persons:

- a) "facilitators", i.e. those who assist the Whistleblower in the whistleblowing process and whose assistance must be confidential;
- b) third parties connected to the Whistleblower (e.g. colleagues, family members);
- c) legal entities linked to the Whistleblower or to the entities referred to in points a) and b) above.

Finally, protective measures apply in the additional circumstances provided for in Article 16 of Italian Legislative Decree 24/2023.

The persons involved in the report, including the reported person, are protected in accordance with the law.

5. PROCESSING OF PERSONAL DATA

Personal data acquired as part of the receipt and management of reports are processed in compliance with the fundamental principles regarding the protection of personal data, such as purpose limitation and data minimization, as required by the Regulation (EU) 2016/679 ("GDPR"), the applicable national legislation and the procedures adopted by INWIT Group, and for the sole purpose of complying with the legal obligation under

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Legislative Decree 231/01, Legislative Decree 23/2023 and Directive 1937/2019, and to implement this Policy.

Personal data that are clearly not needed to process a specific report are not collected or, if collected accidentally, are deleted without delay.

For further information, please refer to the information on the processing of personal data available on the WB portal.

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6. GLOSSARY

ITEM	DESCRIPTION
Code of Ethics and Conduct	INWIT's Code of Ethics and Conduct, together with any annexes, as supplemented or amended from time to time.
Risk and Control Committee/RCC	INWIT's Risk & Control Committee, appointed by the Board of Directors in implementation of the Corporate Governance Code.
Board of Directors/BoD	The Board of Directors of INWIT.
Gate Keeper	Subject acting as "access point" for the report received. This will be the Internal Audit Director and/or the Head of R&C.
HR&O	The company's Human Resources & Organization department.
Company	Infrastrutture Wireless Italiane S.p.A. and group Companies
Management	Any employee of the Company who has a recognised role and responsibility within the Organisational Structure.
Model 231 or Organisational Model 231	The Organisation and Management Model pursuant to Legislative Decree 231/01 adopted by the Company.

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Company and Control Bodies	INWIT's Board of Directors, board committees and Board of Statutory Auditors.
Supervisory Body/SB	The Supervisory Body of the Company appointed pursuant to Legislative Decree 231/01.
Policy	The Whistleblowing Policy adopted by INWIT S.p.A.
LO&CS	Legal Operation & Corporate Security
Whistleblower	An individual who reports information about potential breaches that he/she has become aware of or has acquired in the organisation where he/she works or has worked or in another organisation with which he/she is or has been in contact.
Reported person	The natural or legal person named in the report as the person to whom the breach is attributed or with whom that person is associated.
Whistleblowing	Any information that raises concerns about possible violations, unlawful or irregular conduct or behaviour, including omissions, which fail to comply with national or European Union regulations, thereby potentially harming the public interest or undermining the integrity of the Company. This also includes violations of existing rules and procedures, such as the Code of Ethics and Conduct, and the Organisation and

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	Management Model pursuant to Italian Legislative Decree No. 231/01.
Anonymous whistleblowing	Any report in which the identity of the whistleblower is not made explicit by him/her.
Whistleblowing in “bad faith”	Unsubstantiated report made for the sole purpose of harming or prejudicing the persons reported.
Triage Team	Working group, responsible for the operational management of the reports, which assesses their adequacy and identifies any corrective actions upon completion of the checks. This team consists of specifically trained representatives from INWIT’s Internal Audit and R&C Department, as well as from additional corporate departments, identified from time to time, based on the subject matter of the report.
Top Management	General Manager and Strategic Managers (so-called “key managers”)