



## CODE OF ETHICS AND CONDUCT

APPROVED BY THE BOARD OF DIRECTORS ON 30/09/2024

## Premise

FiberCop's Code of Ethics and Conduct ("Code") reflects the fundamental principles and ethical standards on which FiberCop's commitment to operate in a socially responsible way is based. The same principles and standards are applied consistently across all governance policies.

## About us

FiberCop ("FiberCop" or "Company" and together with the group companies collectively the "Group") is the most advanced and extensive network infrastructure in the country available to Telecommunications and Media Operators ("Operators").

With around 20,000 employees nationwide, the Group offers a wide range of innovative and sustainable solutions that help accelerate the digitalisation of the country.

FiberCop's activities include access services, high-capacity networks, and transport infrastructure, as well as monitoring, diagnostics, installation support and maintenance services, ensuring the highest level of quality, safety and reliability.

The Group is committed to the construction and offer of the fibre optic network to meet the needs of Operators, allowing them to provide the best digital and connectivity services to citizens, businesses and public and private institutions.

## Mission

FiberCop, as the country's leading infrastructure operator, has as *its mission* the transformation and acceleration of the deployment of the fiber optic network accessible to all telecommunications and media operators.

In particular, FiberCop aims to contribute significantly to the economic development of the country, enabling companies to be digitally connected and have a positive impact on society, improving the quality of life, promoting digital inclusion and ensuring:

- increasingly reliable, safe, resilient and fast connections, through the adoption of innovative technologies and virtuous behaviors to be more efficient, in full respect of the environment and in collaboration with local realities.
- the pursuit of resource efficiency objectives, emission reduction (in a Net Zero perspective), the creation of a sustainable supply chain and contributing to the achievement of the United Nations Sustainable Development Goals, respecting Human Rights as an essential prerequisite for every activity.

## Scope

FiberCop's Code of Ethics and Conduct applies to all employees, members of the corporate bodies, members of the supervisory body, collaborators, consultants, suppliers and partners who establish relationships or relationships, direct or indirect, on a stable or temporary basis with the Company or in any case operate to pursue the company's objectives, without exception.

The Code also applies to the subsidiaries of the FiberCop Group.

Compliance with the Code in the performance of their duties and responsibilities is a duty of the members of the corporate bodies, management, workers, external collaborators, as well as, where required by the company's procedural system and/or by appropriate contractual provisions of third parties in business relations with the Company ("Recipients of the Code"). No compromise on integrity in the way activities are managed within FiberCop is acceptable. FiberCop adopts internal policies, procedures and instructions aimed at ensuring that the provisions of the Code are reflected in the conduct of all Recipients. Everyone who works for the Group has a responsibility to develop and maintain a strong corporate culture that creates sustainable value for our customers, investors, staff and all other stakeholders. So, FiberCop is firmly committed to interacting exclusively with partners who uphold high and appropriate ethical standards.

## Purpose

FiberCop adopts and promotes a high level of business ethics and personal integrity in all types of transactions and interactions in which it is involved.

This Code aims to highlight the Group's commitment to ethics, integrity and compliance with regulations, define standards of ethical conduct, provide tools for reporting known or suspected violations and help prevent and detect wrongdoing of any kind.

## Fundamental ethical principles and expected conduct

### Integrity and Transparency

- ✓ *act with transparency, honesty, clarity, fairness and competence in all work activities and in personal or professional interactions with third parties regarding the Company's activities;*
- ✓ *communicate in an open and transparent manner, avoiding any form of deception or omission of material information;*

- ✓ *preserve and not disclose confidential information and personal data of data subjects that may be received in the course of work activities.*

#### Regulatory Compliance

- ✓ *comply with all laws, regulations and regulations applicable to the Group and behave in a way that does not affect the reliability and reputation of the Company;*
- ✓ *comply with all internal policies, procedures and instructions of the Company to ensure compliance in the performance of each individual business activity;*
- ✓ *openly oppose and refrain from any corrupt and fraudulent practices both with reference to relations with Public Administrations and public entities in general, and with regard to private subjects;*
- ✓ *openly oppose and refrain from any activity related to money laundering and tax evasion;*
- ✓ *refrain from collusive, predatory and abuse of dominant position and oppose and report to the competent bodies all practices aimed at reducing free competition in the market.*

#### Social and Environmental Responsibility

- ✓ *adopt behaviors aimed at reducing the environmental impact of company operations;*
- ✓ *contribute to the creation of an inclusive environment that promotes diversity, based on fairness, equality and fairness;*
- ✓ *promptly report any form of exploitation, abuse and violation of Human Rights also in the FiberCop supply chain.*

#### Health and Safety

- ✓ *disseminate and consolidate the culture of safety at work, promoting and demanding responsible behaviour on the part of all Recipients of the Code;*
- ✓ *Observe all safety regulations and protocols to ensure that all infrastructure sites and work environments are protected from hazard and healthy, or managed as necessary;*
- ✓ *promptly inform the hierarchical manager and the safety officers of any real or potential risk or accident in the workplace and in the company's infrastructure sites.*

#### Respect for Human Rights

- ✓ *treat everyone, no one excluded, with respect and dignity, guaranteeing equal treatment and opportunities;*
- ✓ *avoid and combat any form of discrimination, exploitation or abuse.*

#### Ethical Management of Relations with Customers, Suppliers and all Stakeholders in relations with the Company

- ✓ *build relationships based on trust, mutual respect, fairness and competence;*

- ✓ *promote the use and development of Artificial Intelligence systems, in a fair, ethical and responsible manner, to help oversee the ethical and legal risks associated with the use of the Systems;*
- ✓ *strictly disavow conflicts of interest, current and potential and maintain ethical and professional behavior in all interactions. Any conflict of interest, actual or potential, including situations that are even only perceived as conflicts of interest, must be declared to FiberCop so that the Company can appropriately consider and manage any current or potential conflict;*
- ✓ *act adhering to the highest standards in relation to potential conflicts of interest;*
- ✓ *ensure that any decision relating to work (or similar) activities is taken in the interest of the Company, in line with the principles of proper corporate and entrepreneurial management. The Recipients of the Code must avoid any abuse of their position with the aim of obtaining undue advantages for themselves or for others.*

### Financial Transparency

- ✓ *to avoid any practice of corruption, fraud or financial manipulation;*
- ✓ *refrain from carrying out any transaction involving the use or disposal of FiberCop's assets for personal benefit, or that is in any way contrary to the authorization of the Company's management;*
- ✓ *manage financial documentation accurately and completely, respecting the relevant regulations and FiberCop policies.*

### Education and Training

- ✓ *actively participate in the Company's training programs to improve their skills;*
- ✓ *promote knowledge sharing and continuous learning within their work team and in society at large.*

## Violations

It is not permitted to disregard the contents of this Code and the *internal policies*, procedures and instructions aimed at ensuring what is expressed herein. In line with the relevant regulations, FiberCop adopts disciplinary systems aimed at sanctioning non-compliance and/or violations with respect to the content of this Code.

At the same time, it is guaranteed that no Recipient of the Code may be subject to sanctions or in any case to retaliation or discrimination, direct or indirect, if he or she refuses to perform acts or adopt conduct deemed in good faith to be in violation of the Code, even if such refusal has resulted in the loss of a business or other detrimental consequence for the business company and/or Group. On the other hand, the conviction that they are acting in the interest or to the advantage of the Company or the Group does not justify, under any circumstances, the adoption of conduct that is illegal or in contrast with the principles and contents of the

Code. If the recipient of the Code refuses to carry out acts or adopt conduct deemed in good faith to be in violation of the Code, he is obliged to promptly report this circumstance through the channels provided for by the company "Whistleblowing" procedure.

## Reports (Whistleblowing)

The Company has adopted a "Whistleblowing" procedure for the management of reports that identifies the areas of application and the channels to be used to send a report. The information is available on the Company *intranet* and on the *Company's* website. The procedure provides that all Recipients of the Code must promptly communicate:

- ✓ any form of conduct contrary to the contents of the Code or situation that may have a negative impact on the interests of FiberCop;
- ✓ any violations, requests or inducements to violate legal regulations, regulations or company procedures
- ✓ any irregularity or negligence in the keeping of accounting and accounting or management reporting of the FiberCop Companies.
- ✓ any act attributable to gender and/or sexual harassment and any act of bullying;

Without prejudice to legal obligations, the Company guarantees the confidentiality of the identity of the whistleblowers and the absence of negative consequences for who have made a report in good faith.

## Dissemination

The widest dissemination of the Code will be guaranteed through specific training and communication initiatives aimed at all Recipients.

The Code will also be made available through its publication on the FiberCop Intranet portal and on *the Group's* website.

In case of interpretative doubts or any other need related to the provisions of the Code, FiberCop's Compliance function will provide the necessary support.

## Adoption

Following the adoption of this Code – ordered by resolution of the Board of Directors of FiberCop on 30/09/2024, FiberCop will periodically verify the Code and any necessary updates.