



FIBERCOP ANTICORRUPTION POLICY

APPROVED BY THE BOARD OF DIRECTORS ON 25/11/2024

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Premise

FiberCop S.p.A. (also “FiberCop” or “Company”) directs its activities towards compliance with the values and principles set out in the Code of Ethics and Conduct, in the belief that the conduct of business cannot disregard ethics.

FiberCop recognises the importance of national and international anti-bribery laws and repudiates all forms of corruption, eschewing and disapproving the use of corrupt and, in general, illegal or otherwise unethical behaviour to achieve its economic objectives.

The Company is committed to constant monitoring of tools and controls aimed at combating all forms of corruption, active and passive, direct and indirect, involving the staff of FiberCop and any person carrying out activities in the name and on behalf of FiberCop, also ensuring compliance with the regulations in force, both in relations between private individuals and with the Public Administration, observing the provisions contained in the Organisational Model ex Dlgs 231/2001.

To reinforce this commitment, FiberCop has adopted an Anti-Corruption Management System (also ‘System’ or ‘EMS’), of which this Corruption Prevention Policy (also ‘Policy’ or ‘Anti-Corruption Policy’) is an integral part. This System is aimed at preventing, detecting and countering corruption-related phenomena in accordance with Anti-Corruption Laws and Regulations (collectively, also ‘Anti-Corruption Laws’) and, specifically, the UNI ISO 37001:2016 - Anti Bribery Management Systems.

FiberCop is committed to continuously improving its Anti Bribery Management System in accordance with the highest international standards and guarantees the authority and independence of the Compliance Function for the prevention of corruption (also ‘Compliance Function’), identified in the Chief Compliance Officer function in the figure of its Head and the resources and budget allocated to it, appointed by the Governing Body identified in the Board of Directors of FiberCop, upon the recommendation of the Top Management identified in the Ethics and Compliance Committee (also “EC&C”) of FiberCop.

For the Company, the Anti-Corruption Policy represents a fundamental component of a broader system of business ethics and internal control, aimed at ensuring compliance with national and international regulations and standards and protecting the company's reputation. It contributes to

increasing the general degree of compliance with Anti-Corruption Laws and national and international best practices, concretely promoting a corporate culture based on the principles of honesty, integrity and rectitude, on ethically correct behaviour and on preventing and combating corruption.

1. PURPOSE

The Anti-Bribery Policy pursues the following aims:

- managing the risk of corruption according to the 'zero tolerance' principle;
- ensure compliance with Anti-corruption Laws;
- protect the Company from the negative effects of non-compliance with Anti-Bribery Laws, including reputational damage to the Company;
- promote the use of instruments for reporting offences of a corrupt nature, including by third parties in business relations with the Company;
- strengthen adequate awareness of the rules for the active and responsible participation of all addressees in achieving the objectives of the Company's Anti-Corruption Management System.

2. SCOPE

The Policy applies to FiberCop and its Subsidiaries, and to members of their respective Corporate Bodies, employees and collaborators in various capacities.

In relation to joint ventures and Affiliated Companies, FiberCop will implement every initiative, as reasonable as the circumstances require, so that also such Companies and Entities comply with the standards and rules of conduct defined in the Anti-Corruption Policy.

The Policy will be disseminated and known to the following recipients:

- The employees, management and corporate bodies of FiberCop
- The Subsidiaries and/or Associates
- Third Parties, including Customers, Suppliers and Consultants
- The Certification Bodies

Any interpretative doubts regarding the application of this Policy should be addressed to the FiberCop Chief Compliance Officer function.

3. COMMITMENTS

The FiberCop Board, identified for the purposes of ISO 37001:2016, in the Board of Directors of the Company (also "BOD"), is committed to ensuring an adequate internal control system and to guiding the entire organization in achieving expected performance for the prevention and combating of corruption in accordance with the following Guidelines:

- Continued commitment to conduct its activities in full compliance with legal requirements, constantly verifying the correct and adequate application of the rules on anti-corruption and the requirements of the Anti-Corruption Management System;
- Prohibit all forms of corruption by encouraging Recipients to report in good faith any abnormal events, without fear of retaliation;
- Consider transparency and legality as added value, integrating into their processes the controls and improvement actions necessary to manage corruption prevention;
- Take appropriate disciplinary or legal action against any person who has engaged in unlawful conduct contrary to the principles of this Policy.

These commitments are translated into objectives of improvement constantly monitored during the review of the FiberCop Anti-Corruption Management System by the Senior Management and shared with the organization in the appropriate means and channels.

4. COMPLIANCE AND VIOLATION

Each entity that carries out activities on behalf of and for FiberCop is required to carefully review and comply with this Anti-Corruption Policy and act in accordance with what it establishes.

The FiberCop staff, in carrying out their activities, adhere to ethical principles of transparency, clarity, fairness, integrity and equity. In particular, in business relations and relationships, conduct and practices that may even appear illegal or collusive, payments that may even appear illicit, attempts

at corruption and favouritism, solicitation, direct or indirect, personal and career benefits for himself or others and more generally acts contrary to applicable laws and regulations.

Employees and those who work on behalf of FiberCop are aware that in the event of conduct in violation of the Anti-Corruption Laws, they may be subject to criminal and administrative sanctions, as well as disciplinary penalties.

Violations of the rules of conduct provided for in this Policy will be punished - in accordance with the procedures, modalities and deadlines provided by the applicable legal and/or contractual discipline - promptly, through the application of sanctions, considering, in each case, the objective gravity of the infringement, the degree of negligence, whether the same conduct has been repeated and the intention of the conduct, Without prejudice to the recognition in application of the principle of proportionality for employees pursuant to art. 2106 c.c.

FiberCop requires its business partners (along the entire "value chain", upstream and downstream of the Company) to comply with applicable laws, the Code of Ethics and Conduct and this Policy, on the basis of clauses whose non-compliance implies the termination of the contract (as considered serious breach of contract), sanctioned under and for the effects of art. 1456 c.c., without prejudice to any compensation for the damage suffered by the Company.

5. REPORTS

FiberCop, considering the tool of reporting effective to counter corruption, encourages reports, even in an anonymous form, of alleged corruption phenomena through the Company's Whistleblowing Procedure, which regulates the management and verification of reports, to guarantee the confidentiality of the content of reports, the identity of the reporter and the reported person, and to protect the reporter from discrimination or retaliation.

Following the implementation of the Whistleblowing legislation with the D.lgs. 10 March 2023, n. 24 ("Whistleblowing Decree"), FiberCop gives anyone the opportunity to report any wrongdoing through the following reporting channel "Reporting Portal" available at the following link <https://portalesegnalazioni.fibercop.it/>.

The channel, formed by a web platform, is the tool adopted by FiberCop through which anyone - anonymously - may inform the Company if they are aware of any conduct that is contrary to the Code of Ethics and Conduct, 231 Organizational Model, to the operating procedures/instructions and/or regulatory provisions that are likely to compromise the Company's business and/or reputation or cause damage to third parties; by accessing the aforementioned "Reporting Portal" it is possible to consult the guide for reporting.

6. COMMUNICATION AND REVIEW

FiberCop gives this Policy maximum dissemination, ensuring that it is understood and implemented by all recipients; for this purpose it is made available on the institutional website and on the company intranet or through specific communication initiatives.

Following the adoption of this Policy - ordered by resolution of the Board of Directors of FiberCop on 25 November 2024 - the Company will periodically review the Policy and any necessary updates.