

Respecting Human Rights in FiberCop

FiberCop's Policy on Human Rights

1. INTRODUCTION

FiberCop, as the country's primary infrastructure operator, is transforming and accelerating the deployment of a fiber-optic network accessible to all telecommunications and media operators; supporting the economic development of the country by promoting digital inclusion and enabling companies and institutions to be digitally connected, with a consequent positive impact on the environment and people's quality of life.

FiberCop believes that the respect of Human Rights is the foundation of freedom, justice and peace and its commitment to Human Rights is reflected in its Code of Ethics and Conduct and all relevant policies that have impact and application on the value chain. In 2025, FiberCop signed the UN Global Compact which it supports by encouraging suppliers, partners and customers to endorse its principles and refer to:

- UN Universal Declaration of Human Rights of 1948;
- International Labor Organization, Declaration on Fundamental Principles and Rights at Work of 1998;
- UN Human Rights Council, Guiding Principles on Business and Human Rights of 2011;
- OECD, Guidelines for Multinational Enterprises of 2011;
- Frameworks for accountability in technologies and (ex. Fairness, Accountability and Transparency – FAT, 2016–2020);
- The EU Regulation 2016/679 on General Data Protection Regulation (GDPR), which provides for the regulation and increased enforcement of privacy and security controls of personally identifiable information in the EU;
- The ISO 26000:2020 guidelines, which provide guidance on social responsibility for all types of organizations, regardless of size or location.

2. RECIPIENTS

The present policy applies to FiberCop including its value chain, to which FiberCop conveys and communicates elements of the policy in order to share its approach and translate them into joint actions towards shared goals and objectives.

3. PURPOSE AND SCOPE

The purpose of this policy is to define the Company's commitment to respecting, protecting and promoting human rights in all its activities, business relations and value chain as an essential requirement in its practices and operations, inside and outside the Company.

While safeguarding all the Human Rights established in the UN Universal Declaration of Human Rights, FiberCop interprets them in consideration of its own activity and its value chain, extending its meaning to its context, and guaranteeing them in its operation, application and respect. In particular:

- fundamental Human Rights such as the right to life, security of the person, well-being, a healthy and sustainable environment are applied in FiberCop which is committed to guaranteeing the physical and moral integrity of every human being and respects diversity in all its forms; intervenes to safeguard the environment while respecting the ecosystems and people who are part of them. FiberCop guarantees respectable working conditions in terms of working hours, fair remuneration, minimum age for entry into the world of work, job conditions, prohibition of harassment and forced/compulsory/subordinated labor;
- the rights to diversity, equality and non-discrimination. FiberCop applies principles of fairness and honesty, respects Human Rights of each individual and does not discriminate on the basis of religion, age, sex, sexual orientation or gender identity, political opinion, social condition and origin, race or ethnicity, language, physical or mental disability;
- the right to social security through the protection of physical, economic, family and parental well-being. FiberCop also guarantees access to a continuous training for its own workforce and, in appropriate forms, undertakes to gradually extend it to its value chain;
- the rights of the communities in which FiberCop carries out its activities, with particular attention to vulnerable groups of people; the protection of the territory and local communities; the economic well-being produced through the work of its own manpower and of its value chain;
- the rights - including freedom of expression - enabled and supported by innovation and secure, pervasive and seamless access to telecommunication services that generate digital, social, geographical inclusion; FiberCop enables this category of rights through its infrastructure and is the first to adhere to

freedom of expression through a constant and transparent dialogue with all its stakeholders;

- the right to freedom of association and peaceful assembly. The people of FiberCop are free to independently choose and join the trade union organizations which best represent them. The Company acknowledges and protects those who hold trade union representation positions, and guarantees equal opportunity in career paths;
- the right to a social order in which the rights and freedoms set out here can be fully realized. FiberCop is active in the fight against corruption as already stated in its Code of Ethics and Conduct and in the anti-corruption policy. Within these rights, FiberCop also recognizes the importance of the right to privacy and presides Cybersecurity issues;
- the right to a "human-centric" approach, based on minimizing the risks caused by the development of artificial intelligence, promoting responsible technological innovation, safe, protective of human beings, non-discriminatory. FiberCop monitors the implications of an improper use of artificial intelligence so that it remains a tool available to the human being, which does not disregard the person and in no way prevaricates him.

FiberCop's Human Rights policy is supported by procedures and management processes implemented by the target functions and is anchored to international legislation and regulatory organisms, which also require the development of specific training and communication programs regarding the issues.

4. REFERENCES

- UN Universal Declaration of Human Rights, 1948
- UN International Covenant on Civil and Political Rights, 1976
- UN International Covenant on Economic, Social and Cultural Rights, 1976
- UN Human Rights Council, Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework, A/HRC/17/31, 2011
- UN Global Compact Office and Office of the United Nations High Commissioner for Human Rights, A Guide for Business: How to Develop a Human Rights Policy, 2011 e 2015
- UNICEF and The Danish Institute for Human Rights, Children's Rights in Impact Assessments, December 2013
- International Labor Organization, Declaration on Fundamental Principles and Rights at Work, 1998
- International Labor Organization, Conventions 14, 29, 30, 87, 98, 100, 105, 111, 135, 138, 144, 155, 161, 171, 175, 182, 183

- International Labor Organization Tripartite Declaration of Principles concerning Multinational Enterprises and Social policy, 1977
- OECD, Guidelines for Multinational Enterprises, 2011
- CSR Europe Assessing the effectiveness of company grievance mechanisms, 2013
- European Commission, ICT Sector Guide on Implementing the UN Guiding Principles on Business and Human Rights, 2013
- Blueprint For Embedding Human Rights in Key Company Functions, CSR Europe, 2016
- Declaration on Equal Opportunity and equality at work, signed by FiberCop on June 9th 2025

5. FIBERCop'S STRATEGIC ROLE AND APPROACH

FiberCop, aware of its role and the strategic importance of its activities, is committed to reconciling its mission and its business with global sustainable development by ensuring policies, initiatives and behaviors consistent with the United Nations' Sustainable Development Goals (SDGs) in order, as stipulated by them, to collaborate in the creation of a context *"in which human rights and human dignity, the rule of law, justice, equality and non-discrimination are universally respected"*. Therefore, among others, it is committed to achieving the following objectives and targets:

- Goal 3, Good Health and well-being, target 3.d to strengthen the capacity for early warning, risk reduction and management of health risks for its own manpower and that of its value chain;
- Goal 5, Gender equality, target 5.5, to ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life; target 5.c, to adopt and strengthen sound policies and enforceable legislation for the promotion of gender equality and the empowerment of all women at all levels;
- Goal 8: Decent work and economic growth, target 8.3 to the extent that the FiberCop network is a privileged instrument in the promotion of development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formalization and growth of micro-, small- and medium-sized enterprises, including through access to financial services; target 8.8, to protect labor rights and promote safe and secure working environments for all workers;
- Goal 9: Industry, Innovation and Infrastructure, target 9.1 through FiberCop's mission, namely to develop quality, reliable, sustainable and resilient infrastructure, including regional and transborder infrastructure, to support economic development and human well-being, with a focus on affordable and equitable access for all;

- Goal 10: Reduce inequalities, target 10.2 that FiberCop enacts by empowering and promoting the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status;
- Goal 11: Sustainable cities and communities, target 11.3 FiberCop, infrastructuring the country in a capillary way, enables, as required by the target, inclusive and sustainable urbanization and capacity for participatory, integrated and sustainable human settlement planning;
- Goal 17: Partnering for the goals, target 17.6 that in FiberCop is implemented thanks to its network, a technological facilitator that enables communication and cooperation between different geographies, access to science, technology and innovation. Through this enabling role, FiberCop promotes an ecosystem of collaboration with public, private and third sector partners, contributing to the construction of widespread social value and strengthening the common good in the communities in which it operates.

6. FIBERCOP'S COMMITMENT

FiberCop implements its commitment to Human Rights by implementing the following approaches in its organization and operations:

1. Cross-functional leadership. Human rights permeate the corporate culture and actively involve all corporate functions in terms of competence and accountability.
2. Shared governance. The Sustainability and Human Resources functions work together to implement the analysis of specificities and identify the most effective ways to address them.
3. Continuous training. FiberCop aims to create a strong corporate culture, aware, constantly updated and operational in its value chain where the respect of Human Rights constitutes a concrete and daily experience.
4. Two-way communication, both internal and external. In the dialogue from the top to the bottom and from the bottom to the top, FiberCop identifies the most effective means of spreading and transmitting its commitment on all issues involving Human Rights. This dialogue is also active between FiberCop and its value chain.
5. Incentives. In order to raise awareness of the importance of respecting Human Rights, managerial performance is also evaluated on appropriate declarations of this aspect.
6. Analysis, review, integration. The effectiveness of commitment is measured by indicators that measure its effectiveness and impact in relation to training, non-

discrimination, health and safety at work, employee engagement, work-life balance tools.

FiberCop furthermore reinforces these activities through:

- identification of the risks arising from its operations, resulting from the context in which it operates;
- verification that each supervised theme is governed by a specific internal regulatory framework, is equipped with management systems for tracking and monitoring performance through appropriate indicators, has assigned the relevant responsibilities;
- definition of a progressive improvement path shared and communicated periodically to stakeholders;
- possibility to report any violations through the Whistleblowing channel, accessible from the company intranet and FiberCop's website.

The present document is communicated to the people of FiberCop, suppliers and partners, and will be subject to periodic review considering its adequacy and effectiveness of implementation.

This document has been disclosed for information to the Board of Directors on July 29th, 2025.