



Supplier Code  
of Conduct



# Enabling ingenuity, building the future, connecting Italy

#WorkASATEAM

#BeCOURAGEOUS

FiberCop is the Italian company that builds and manages the most advanced, extensive and widespread digital network infrastructure in the country, contributing to digital and sustainable development and promoting inclusion, innovation and competitiveness.

FiberCop recognizes sustainability as a guide for strategic and operational choices capable of generating long-term value for the organization itself, for its stakeholders and for the community in which it operates.

**FiberCop considers its supply chain a key element in the creation of shared value and in the promotion and dissemination of the principles of social and environmental sustainability.**

This integrated vision translates into a concrete commitment to selecting and involving suppliers who share, apply and transmit the same values internally and to their supply chain, promoting a business model oriented towards ethics, sustainability and innovation. FiberCop adopts stringent criteria for the assessment and selection of its supply chain, ensuring that each supplier adopts ethical and sustainable behavior, in line with international standards and the company's ESG objectives. The aim is to build relationships of trust, generate positive impacts both from a social and environmental point of view, and position itself as a guide of a virtuous ecosystem.

**This Supplier Code of Conduct is a strategic tool through which FiberCop establishes the minimum standards that suppliers, subcontractors and business partners are required to comply with.** The Code is inspired by the Ten Principles of the United Nations Global Compact and takes into account European directives on ESG Reporting, such as the Corporate Sustainability Reporting Directive

(CSRD) and the Corporate Sustainability Due Diligence Directive (CSDDD).

**The Code applies to all suppliers, consultants, partners and subcontractors operating with FiberCop,** regardless of their registered office, size or sector of activity. By adhering to this document, the supplier undertakes to comply with the principles and provisions contained herein. Suppliers will disseminate the principles and spirit of this Code throughout the supply chain, raising awareness among their suppliers on corporate social responsibility issues, establishing responsible procurement policies in line with this Code and implementing reasonable due diligence measures whenever possible or supervising with practices that are as formalized and recursive as possible with respect to their subcontracting chain, to address human rights, sustainability, ethics and integrity risks.

In addition to the responsibilities outlined in the Code, the supplier is required to comply with all applicable laws including, but not limited to, immigration and labor laws, health and safety laws, and environmental laws.

**The Code is approved by FiberCop's Management Committee.** The Procurement function is responsible for its implementation, while its updating is the responsibility of the Sustainability function.

**The Code is communicated to all suppliers, is an integral part of the contractual commitments and supported by periodic training activities** aimed at allowing the transfer of the principles represented in the Code within and along the supply chain.





# Universal principles

## #ActRESPONSIBLY

FiberCop believes that respect for Human Rights is the foundation of Freedom, Justice and Peace and its commitment to Human Rights is reflected in the Code of Ethics and Conduct and in all relevant policies that have an impact and application on the value chain.

In 2025, FiberCop signed the United Nations Global Compact that FiberCop supports by requiring suppliers, partners and customers to approve its principles and at the same time to refer to the UN International Charter of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Rights and Principles, FiberCop's Human Rights Policy and all applicable laws.

FiberCop's suppliers are committed to respecting fundamental rights, promoting fair, safe and inclusive labor practices throughout the supply chain.

In particular, FiberCop's suppliers, supervising their supply chain, undertake to guarantee for their workers:

- respect for human rights as enshrined in international regulations (UN, ILO, European Convention on Human Rights);
- prohibition of child labour, forced or coercive labour, in any form;
- prohibition of human trafficking, which also includes the destruction or confiscation of identity or immigration documents, fraudulent recruitment tactics, charging employees with unreasonable recruitment fees, or inadequate housing under applicable laws;

- freedom of association and the right to collective bargaining;
- non-discrimination based on gender, race, age, religion, sexual orientation, health condition or any other condition;
- decent working conditions in terms of working hours, fair wages, fair benefits in line with the labour market of the country in which they operate and best practices;
- equal pay and fair working conditions, aiming to obtain the Gender Equality Certification pursuant to UNI/PdR 125:2022;
- prevention of harassment, abuse, physical or verbal violence and promotion of psychophysical well-being;
- minimization of the risks caused by the development of artificial intelligence, promoting responsible, safe, non-discriminatory technological innovation to protect men and women, monitoring the implications of improper use of artificial intelligence so that it remains a tool available to human beings and does not abuse them in any way.

#### **Subcontractor Compliance**

Suppliers shall verify that employees of subcontractors working on FiberCop projects are treated in a manner consistent with the principles established herein and comply with the conduct established in the Code itself.



# Health and Safety

#CareDEEPLY

#ActRESPONSIBLY

The protection of health and safety is essential for FiberCop.

Every work activity must be designed, organized and managed in order to protect the integrity of the workers involved.

Fibercop's suppliers will adopt the highest standards of prevention for the elimination of risks in the field of workers' health and safety, favoring their application also to their entire supply chain

Namely:

- intervene on risks at source by favoring technical measures that allow effective control;
- favor collective protective equipment over individual devices;
- aim to contain and, where possible, eliminate the level of danger of potentially dangerous equipment or work situations, carrying out continuous and in-depth market research, directing itself towards innovative and ad hoc solutions for specific business needs;
- to commit to the safety and health of its employees and to ensure that any training for staff is completed before the start of any work activity;
- implement as much as possible a continuous exchange of information with other companies, actively participating for its role and for its part in the work of industrial associations or, when possible, in tables of national standardization bodies and promoting studies and analyses at recognized technical and scientific research centers.

The measures identified for the purpose of risk control will apply to any worker

who finds himself carrying out, even temporarily, activities that expose him to the hazards identified in accordance with the procedures provided for by the safety procedures.

In operational terms, FiberCop suppliers undertake to adopt or refer to a safety management system (ISO 45001 or equivalent) and, in full compliance with Legislative Decree 81/2008, the following practices:

- assessment of specific risks for each activity or construction site;
- continuous and updated training for its workers through tools that allow it to be extended to its supply chain and the provision of specialized courses suitable for its sector and activity;
- supply and mandatory use of personal protective equipment (PPE);
- procedures for the management of accidents, near misses and injuries;
- health surveillance also through medical examinations and measures to prevent work-related stress;
- emergency plans and first aid personnel present at each operational site;
- promotion of inclusive work environments that respect the dignity of every person.

The goal is to **support each worker with a network of concrete tools**, consolidated and when necessary revised processes, which facilitate the timely reporting of critical issues and an effective resolution of the same.

In this context, FiberCop requires transparent communication and constant dialogue with all those involved, nurturing a climate of mutual trust and active participation.

The involvement of people and responsible figures in the Company is considered essential so that the culture of prevention constitutes a shared heritage also with its suppliers and translates into conscious and proactive behavior.

The **culture of health and safety** is strengthened through continuous investment in training, in the development of specific skills and in raising awareness of individual and collective responsibilities.

Only through an integrated approach, which values the contribution of each person and promotes constant dialogue between the various company functions and with its suppliers, is it possible to build a system capable of adapting to emerging challenges without ever losing sight of the centrality of the person and the need to protect their psychophysical integrity.

# Environment

#WorkASATEAM

#BeCOURAGEOUS

#ActRESPONSIBLY

FiberCop strongly believes that actions to protect the environment and ecosystem are real opportunities capable of generating long-term value in terms of efficiency and with positive economic and reputational effects.

FiberCop's partners and suppliers are required to adopt responsible practices in environmental management, reducing the environmental impact of their activities and contributing to the energy transition along their entire value chain.

## Environmental protection

FiberCop's suppliers are required to constantly refer to FiberCop's Institutional Environmental Policy and, based on the principles and strategy represented therein, commit to:

- ensure compliance with national and international environmental regulations;
- implement a certified environmental management system (es. ISO 14001) or equivalent;
- make responsible use of natural resources, promote actions to reduce water and energy consumption;
- properly manage waste and promote the reuse and recycling of materials;
- prevent air, noise, water and soil pollution;
- protect landscape, biodiversity and ecosystems if potentially impacted by its own activities or those of its supply chain;
- promoting environmental training among staff and stakeholders, stimulating a culture of sustainability and awareness of emerging environmental risks;



- estimate and progressively reduce the environmental footprint of its products, services and supplies throughout their life cycle;
- report their impacts according to recognized international standards (CSRD-Corporate Sustainability Reporting Directive or GRI-Global Reporting Initiative) and, if possible, obtain third-party certification.

In addition, FiberCop's suppliers will commit to preferring materials and products with third-party environmental certifications, where applicable, to reduce the environmental impact of supplies and promote a circular and sustainable economy.

### Climate change

As a concrete contribution to the fight against climate change, suppliers and partners are committed to being in line with FiberCop's short-term<sup>1</sup> and long-term<sup>2</sup> goals as well as the overall Net-Zero goal of achieving net greenhouse gas emissions along the entire value chain by 2050.

In order to define effective targets in the fight against climate change, suppliers will define their own science-based decarbonisation pathway by 2029, i.e. functional to containing the global temperature to within 1.5 °C compared to pre-industrial levels, as enshrined in the 2015 Paris Climate Agreement.

To this end, suppliers will have to carefully monitor their consumption in full awareness of the carbon footprint they generate, define emission reduction targets along a trajectory recognized by science (e.g. the trajectories of the Science Based Initiative) and achievable through appropriate structural and operational levers. In addition, sharing the results with FiberCop and actively collaborating in FiberCop's ESG reporting initiatives is an indispensable requirement for achieving the objectives.

<sup>1</sup> FiberCop is committed to reducing absolute Scope 1 and 2 GHG (greenhouse gas) emissions by 70% by 2030 compared to the 2023 base year. FiberCop is also committed to reducing absolute Scope 3 GHG emissions from downstream leased assets by 70% over the same period. The FiberCop targets have been validated by the Science Based Target initiative - SBTi.

<sup>2</sup> FiberCop is committed to reducing absolute Scope 1 and 2 GHG emissions by 90% by 2040 compared to the 2023 base year. FiberCop is also committed to reducing absolute Scope 3 GHG emissions by 90% by 2050 compared to the same base year. FiberCop's targets have been validated by the Science Based Target initiative - SBTi.

# Business conduct

## #ActRESPONSIBLY

Integrity, ethics and transparency are essential conditions in relations with FiberCop's suppliers and customers, who are required to behave in accordance with the highest standards of corporate integrity.

### Integrity

The supplier is required to conduct its own and its supply chain activities in compliance with ethical and integrity principles, making use of organizational systems consistent with the principles outlined in FiberCop's Code of Ethics in order to maintain long-lasting, honest and transparent relations with FiberCop. The business activity will be based on compliance with the rules of fairness and loyalty in accordance with the relevant regulations. Especially:

- prohibition of corruption, fraud, bribery, extortion and unfair commercial practices;
- be careful to avoid even the appearance of misconduct;
- adoption of effective anti-corruption policies, preferably in line with the UNI ISO 37001 standard
- prohibition of offering, giving or receiving improper payments or other benefits, or encouraging or permitting others to do so, in order to obtain or maintain an advantage, even where these practices are considered customary in a given context;
- prohibition to offer, to FiberCop personnel and, in general, to anyone who carries out activities on our behalf, gifts or other benefits aimed at obtaining preferential treatment, of any kind, even if only potential;

- transparent management of conflicts of interest and business relationships;
- protection of personal data and confidentiality of company information, in line with the General Data Protection Regulation (GDPR) of the European Union;
- traceability and integrity in procurement processes;
- full collaboration with FiberCop in case of audits, controls or documentary requests on compliance.

### **Books and registers**

Suppliers are required to create and maintain accurate books and records and not to alter them to conceal or distort business transactions.

### **Conflicts of interest**

Suppliers must protect FiberCop's reputation and avoid any conflict of interest, even apparent.

### **Management system**

Particular attention is paid to the implementation of internal procedures aimed at preventing any type of wrongdoing, including specific training programs for staff and periodic checks on the effectiveness of the measures adopted. Accurate documentation of operations and transparent decision-making processes are fundamental pillars to ensure a trusting and responsible relationship with FiberCop. In addition, constant dialogue with its stakeholders is required, aimed at maintaining a corporate climate based on compliance with the rules and the proactive management of any critical issues.

### **Compliance with international trade laws**

Suppliers comply with laws and regulations applicable to international trade, including import controls, export controls, and trade sanctions. Suppliers are required not to transfer FiberCop's business information to third parties without the express written permission of FiberCop.

### **Responsible sourcing of minerals**

Suppliers must ensure that the minerals in their products do not finance conflict, forced labour and other illegal activities in violation of human rights.

### **Substance abuse**

Suppliers activate processes aimed at verifying that employees do not work under the influence of alcohol or drugs.

### **Quality of products**

Suppliers ensure that their products meet applicable quality standards. Through internal methods and procedures, suppliers identify product defects and put in place appropriate measures to correct them.

### Protection of intellectual property, privacy and information security

Suppliers respect applicable intellectual property, privacy and information security rights and laws; they protect the reasonable expectations of confidentiality of all those with whom they do business. When personal or proprietary information is collected, processed, transmitted, or stored, providers must protect it with physical and electronic security procedures from unauthorized access, modification, or destruction.

### Transparency

FiberCop provides all its suppliers with a portal for reports that can be reached at the following address <https://portalesegnalazioni.fibercop.it/> and suitable for guaranteeing the confidentiality of the identity of the person making the report, which in any case must be detailed and made in good faith. The supplier undertakes, as far as applicable, to make similar means and tools available to its employees.

FiberCop reserves the right to verify or control the compliance of suppliers with this Code. suppliers will respond promptly to the issues covered by this Code. Such requests may include surveys, questionnaires, requests for supporting documentation, and other measures designed to increase the visibility of our supply chain.





