

GUIDELINES

ANTI-CORRUPTION

Fastweb S.p.A.

Document approved by the Board of Directors
Fastweb S.p.A. on July the 26th 2018

Index

FOREWORD	3
THE REGULATORY FRAMEWORK	4
THE RECIPIENTS	4
SCOPE	5
GENERAL RULES	6
SENSITIVE AREAS IN FASTWEB	6
6.1 Management of the relations wiht the public administration	7
6.2 Conflicts of interest	7
6.3 Bribes	8
6.4 Contribution to political parties	8
6.5 Lobbying	8
6.6 Donations and sponsorship	8
6.7 Gits, tributes and hospitality	9
6.8 Relations with external stakeholder: customers and suppliers	9
6.9 Human resources management	10
APPROVAL, ANTI-CORRUPTION OFFICER, COMMUNICATIONS AND TRAINING	11
7.1 Approval and anti-corruption officer	11
7.2 Communications	11
7.3 Training	11
CONTROL ACTIVITIES AND REPORTING	12
8.1 System of internal control	12
8.2 Second level controls	12
8.3 Audit	12
8.4 Reporting	12
DISCIPLINARY SYSTEM	13
ENTRY INTO FORCE	13



Foreword

One of the most successful aspects of Fastweb is to have chosen to run its business by maintaining an ethically responsible, transparent, complete and honest conduct, which has enabled the company and its employees to respect always the highest standards required by law and from national and international best practices.

In order to guarantee this result, Fastweb has adopted an effective system of internal policies that, starting from the essential Model 231, consists of the "Code of Ethics", the "Anti-corruption Directive", the "Anti-corruption Directive-Invitations to events" (hereafter "Anti-corruption Directives"), the "Gifts Policy", the procedure "Transactions

in conflict of interests or with interests of other directors or employees" (hereinafter "Transactions with interests"), the "Donations Policy", the "Sponsorship Management" procedure and all further protocols set forth in Model 231. Fastweb's commitment to ensure a fair and correct management of its business never stops and is constantly aimed at self improvement.

On this purpose, Fastweb has proactively decided to adopt these **Anti-corruption Guidelines** (henceforth **Guidelines**), in the awareness that an adequate anti-corruption system represents a further factor in strengthening corporate reputation.

1.1 Targets

These **Anti-corruption Guidelines** summarize the existing internal policy framework, which establishes an organic and consistent system of principles of integrity and transparency, suitable to raise professional standards to which be compliant with in the conduct of the business.

Fastweb aims at defending its reputation as an honest and upstanding company, both in the running of commercial activities as well as in management and administration, actively committed in the prevention and counteraction of illicit facts.

It is of pivotal importance for Fastweb to maintain excellence in contrasting corruption practices in all its forms and in preventing the occurrence of corruptive cases within the company or outside, on its behalf.

Because of this, Fastweb has adopted among its founding values that inspire its behavior the general principle of:

- "ZERO TOLERANCE TO THE CORRUPTION"
Without prejudice to the obligation to comply with all anti-corruption legislation, better indicated in art. 2, and, in accordance with the provisions of the 10th

principle of the UN Global Compact, Fastweb has enshrined the following key principles:

- FASTWEB REFUSES CORRUPTION IN ALL ITS DIRECT AND INDIRECT, ACTIVE AND PASSIVE FORMS, INVOLVING OFFICIAL OR PRIVATES;
- FASTWEB FOLLOWS A PROACTIVE PROGRAM FOR FIGHTING CORRUPTION, INTERNAL AND EXTERNAL, THROUGH THESE **ANTI-CORRUPTION GUIDELINES**.

The **Guidelines** are inspired by all the principles already established in the company policies.

The Management Board, the managers and all the employees of Fastweb are personally engaged in respecting the anti-corruption laws and are also called upon to spread and transfer the cited principles to all their collaborators and to represent, through their conduct, a correct model of conduct.



The regulatory framework

Over the years, initiatives aimed at contrasting the phenomenon of corruption in national and international contexts have been multiplied, such as, but not limited to, the following:

- December 1997: "Convention of the Organization for Economic Cooperation and Development on the Fight against Corruption of Foreign Public Officials in International Business Operations";
- Legislative Decree 231/2001: "Criminal liability of legal entities" for crimes such as internal and international corruption, committed by their directors, employees or collaborators, in Italy and abroad in the interest or for the advantage of the company;
- UNCAC - United Nations Convention against Corruption, signed on 09.12.2003
- Law no. 116/2009 - ratification of UNGA Resolution no. 58/4 of 31 October 2003 (Merida Convention);
- Law no. 110/2012 - ratification of the Criminal and Civil Convention on Corruption of the Council of Europe 27 January 1999;
- Law 190/2012: "Provisions for the prevention and repression of corruption and illegality in the Public Administration";
- Presidential Decree no. 62 of 2013: "Rules of conduct of public employees";
- Law 179/2017: "Provisions for the protection of reporters of offenses or irregularities of which they have come to know in the context of a public or private work relationship"; Foreign Corrupt Practices Act (FCPA), issued in the United States of 1977;
- UK Corruption Act, issued in the United Kingdom of 2010;
- ISO/DIS 37001 – Anti-Corruption Management Systems, international standard for anti-corruption management systems of the self-regulatory rules adopted by the trade associations;
- international best practice rules;

Any violation of these regulations exposes Fastweb to serious reputational damage as well as to specific sanctions such as, among others, significant pecuniary fines, the ban on contracting with public bodies, confiscation of the profit arisen from the crime and claims for damages, plus prison sentences and penalties for persons.

The **Guidelines** are inspired by the aforementioned rules.

The recipients

For the purposes herein, the **Guidelines** apply to directors, members of the corporate bodies, managers, members of the Management Board, managers, employees (hereinafter "internal recipients") and to all collaborators or consultants, suppliers and other partners who carry out their activities in favour of Fastweb within the limits of their respective contractual relationships (hereinafter "external recipients").

Compliance with these **Anti-corruption Guidelines** is a personal obligation of every internal and external recipient of Fastweb.

In order to achieve the highest levels of standards' sa-

tisfaction, within the limits set by law, Fastweb uses its influence to facilitate the respect by all the external recipients of the provisions contained in these **Guidelines**. The **Guidelines** are brought to the attention of all the external recipients also in order to promote a common ethical behavior, an information flow suitable to prevent the occurrence of corrupting cases, a shared commitment to the fight against corruption and the structuring of a system of adequate control.

All (internal and external) recipients are required to read and understand the contents of the **Guidelines** and to behave in accordance with the principles they establish, together with all the other Fastweb policies, laws and regulations of the countries in which it operates.



Scope

In order to set a suitable system of contrast and, at the same time, of prevention of corruption, it is necessary to clarify which behaviors and conducts Fastweb categorically refuses.

In general, Anti-Corruption Laws qualify as illegal the promise, offer, payment or acceptance, either directly or indirectly, of money or other benefits for the purpose of obtaining or maintaining a business gain or ensuring an unfair advantage in relation to corporate activities.

For this reason, Fastweb accepts and adopts the notion of corruption provided by Transparency International according to which, corruption is "*the abuse of entrusted power for private gain*".

"Power" means any ability to set rules for others or to impose rules on others, or, lastly, to make decisions that are mandatory for others; for "abuse" we consider all uses of power for purposes or in any way contrary to the terms provided; for "private advantage" we consider the financial or other type benefit that is not necessarily personal to the subject who abuses the power, being possible to concern to third parties to whom the subject is linked in some way (family, friendships, interest groups ...).

Therefore, Fastweb prohibits (internal and external) **Recipients** of the **Guidelines** from:

- carrying out - in relations with the public administration and public officials¹, as well as with other private parties -, the promise, offer or donation - directly or through third parties unrelated to Fastweb -, of money or other utility²,
- soliciting the acceptance or the receiving, directly or indirectly, of money or other benefits, in all cases where the objective of the exchange is to ensure an unfair advantage in relation to the business activities, generating a damage, even if only reputational, for Fastweb.

Moreover, Fastweb refuses any conduct, although different from the aforementioned cases, provided that it is capable of distorting competition, altering the market or, in general, violating the laws in force.

Fastweb undertakes to manage carefully all potential and actual cases of conflict of interests, as they constitute a fertile ground for the onset of illegal, criminal and non-criminal facts.

Lastly, always in line with the principles established by Transparency International, Fastweb prohibits the recipients of the **Guidelines** from offering or receiving bribes and from exercising extortions to the detriment of anyone.

1 A Public Official is: a) whoever exercises a legislative, judicial or administrative public function; b) anyone acting in an official role in the interest or on behalf of (i) a national, regional or local public administration, (ii) an agency, office or body of the European Union or an Italian or foreign public administration, national, regional or local, (iii) a company owned, controlled or participated by an Italian or foreign public administration, (iv) an international public organization, (v) a political party, a member of a political party or a candidate for a political office, Italian or foreign; c) any person in charge of a public service who, for whatever reason, gives a public service, where public service means an activity that is regulated in the same forms as the public function, but characterized by the lack of the typical powers of the latter. The performance of simple order tasks and the provision of purely material work are excluded.

2 Everything that represents for the person a material or moral, patrimonial or not patrimonial advantage, considered relevant from the custom and from the common conviction.



General rules

Fastweb and the (internal and external) recipients of these **Guidelines** shape their behavior on the basis of following general principles.

All Fastweb relations involving in any way a public official or a private party must be conducted in compliance with the procedures established by law, the provisions of these **Guidelines** and any other company policy.

Fastweb does not tolerate nor justify the use of practices illegal or, in any way, capable of causing image damage to itself, simply because it is customary in the reference market. In fact, Fastweb refuses any service whose achievement compromises company policies

Relations with the Public Administration and private parties must be kept exclusively by the competent corporate subjects.

Fastweb adopts the principle of separation of duties according to which tasks, the operating activities and control functions must be adequately distinguished, so that the person in charge of the operational activity is different from who controls and authorizes it.

In order to ensure the widest possible transparency in the execution of its activities, Fastweb provides mechanisms of traceability and archiving of all operations carried out.

The internal recipients of the **Guidelines** will not be fired, demoted, suspended, harassed or discriminated in any way for refusing to make a payment or donation of gifts or other forbidden benefits, even though such behavior implies the loss of an opportunity for Fastweb.

Sensitive Areas in Fastweb

The **Guidelines** have been developed at the conclusion of a specific risk assessment, which is carried out just in time, i.e. every time that regulatory updates or organizational changes, among company processes and information systems, occur, in order to evaluate, monitor and prevent the risk of corruption, and define adequate training programs (see section 7.2 "Training").

The Anti-corruption Officer (see par. 7 "Approval, communication and training") will evaluate the updates to the **Guidelines** which may be required also upon indication by all internal recipients, who are requested to report any violations (see section 8.4 "Reporting") and to contribute to the definition of the necessary actions to prevent and contrast corruption.



6.1 Management of the relations with *Public Administration*

The public procurement market is a significant component of Fastweb's turnover, therefore, it is of fundamental importance for Fastweb to act in compliance with the ethical principles set out in the Code of Ethics and implemented in the company organization and to respect procedural rules defined in 231 Model with regard to relations with the Public Administration.

The internal recipients, in dealing with the Public Administration and the Contracting Authorities, must:

- Trace economic relations,
- immediately report any direct or indirect request aimed at obtaining payments or other benefits in order to carry out or to refrain from doing activities towards Fastweb,
- communicate to the competent manager any gifts (including hospitality) for institutional purposes intended for subjects belonging to or linked to the Public Administration or to Contracting Authorities, specifying motivation thereof,
- inform the direct manager, the Human Capital and the Supervisory Body of any situations of potential conflict of interest,
- declare any relations of kinship and / or affinity with managers and employees of the public administration and / or contracting authority.

6.2 Conflicts of interest

In the awareness that conflicts of interest may degenerate into corruptive cases, the internal recipients of these **Guidelines** are obliged to avoid and possibly report any situation that may constitute or cause a conflict of interest between the personal or family activities and the tasks covered within the structure, in compliance with the provisions of par. 1.5 "Conflicts of interest and transparency in company deeds" of the Code of Ethics and as provided for in the "Operations with interest" procedure.

In particular, in compliance with the Code of Ethics, any situation that may constitute or determine a conflict of interest must be promptly communicated to the direct manager, the Human Capital - who is responsible for the assessing, on a case-by-case basis, of any incompatibilities or prejudice situations - and to the Supervisory Body.

The involved person immediately abstains from interve-

ning in the operational / decisional process and the manager responsible will be required to reorganize the activities affected by the conflict of interest accordingly.

On this purpose, reports of situations of conflict of interest, including those only potential, both internal and external to company activities, are traced in a specific database, managed and updated by the Internal Audit team, Risk Management & Supervisory Body 231.

Furthermore, Fastweb undertakes not to assign paid positions to employees of any level or collaborators of a public administration or of a contracting authority that have exercised, during last three years of office, authoritative or negotiating powers towards Fastweb, the sole shareholder Swisscom Italia S.r.l. and the subsidiaries for the three years following the termination of the public employment relationship.



6.3 Bribes

Fastweb prohibits the use of any form of illegal payment, in cash or by means of other benefits, in order to gain an advantage in relations with the counterparties (advantage also intended as facilitation or guarantee of achievement of due activities).

The ban is extended to the members of the Management Board, to the managers and to all the employees of Fastweb who, by reason of their role and activities, intend to accept and / or offer bribes for the benefit of themselves or of family members and acquaintances.

Fastweb refuses all forms of "facilitation payments", that

is to say any payment or giving - directly or indirectly - of unofficial payments, even if of insignificant value, made to public officials, in order to speed up, favor or assure performances, however due, within the scope of their office duties.

In the event of a promise, offer or request for bribes,

Fastweb employees notify the Supervisory Body (organo. vigilanza@fastweb.it) and the Anti-Corruption Officer, at the following address anticorruzione@fastweb.it. and / or through the channel dedicated to the collection of reports, links: <https://agora.fastweb.it/sezioni/whistleblowing-di-cosa-si-tratta-e-come-segnalare>

6.4 Contribution to political parties

Fastweb abstains from any illicit pressure, direct or indirect, to political exponents, does not finance parties, their representatives or candidates, both in Italy and abroad,

does not sponsor events that have an exclusive purpose of political propaganda.

6.5 Lobbying

In its institutional relations and in the management of interest representation activities, Fastweb:

- establish, without any kind of discrimination, stable channels of communication with all institutional interlocutors at an international, european, national and local level,
- represents company interests and positions in a transparent, rigorous and coherent manner, avoiding collusive attitudes.

In order to guarantee maximum transparency in relation-

ships, contacts with institutional interlocutors take place exclusively through the Fastweb Institutional & External Relations team.

Lobbying activities are carried out in full compliance with national and EU regulations (such as, for example, the "Regulation of the activity of representing interests at the Chamber of Deputies" and the "Agreement between the European Parliament and the European Commission on the transparency register for organisations and self-employed individuals engaged in EU Policy-making and Policy implementation" issued on the 19th September 2014).

6.6 Donations and sponsorship

Fastweb makes and manages donations in favour of voluntary and non-profit organizations as established in the "Donations Policy", available at the link: <https://agora.fastweb.it/sezioni/policy-hc>
Company donations are forbidden for:

- individual persons not acting as non-profit organizations or associations,
- associations, which on the occasion of previous donations by Fastweb, have shown critical issues (eg irregularities, lack of documentation, etc.)

- political parties.

The prohibitions provided in the Fastweb Code of Ethics and in the 213 Model are also applicable (documents can be consulted in the Procedures Manual, Corporate Governance section).

If the object of the donation is the provision of a service or in any case a donation of goods or economic contributions of continuative or periodic nature, in the letter of intents it must be specified the time limit for the interruption of the supply, which can not be longer than 2 years.



Fastweb makes and manages sponsorships as established in the "Sponsorship Management" procedure.

Sponsorship activities must contribute to Fastweb positioning on the market, to the promotion of its products and services, to the fidelity and relationship with its customers and to the involvement and satisfaction of its collaborators.

Sponsorship activities must be evaluated and validated by the Communication manager, together with all the internal offices involved, ie BU Enterprise and Institutional&Ex-

ternal Relations, which assess their consistency with company strategies, sponsee's quality and the return of the initiative also in terms of visibility.

Sponsorship areas are defined in the "Sponsorship Guidelines" attached to the Sponsorship Management procedure, available at the link:
<http://processi.agora.fastweb.it/index.php?sid=136>.

Sponsorships and promotional activities have to be managed in compliance with the provisions of 231 Model and the Anti-corruption Directives.

6.7 Gifts, tributes and hospitality

It is not allowed to receive or distribute any form of gift or complimentary good that can be interpreted as exceeding normal commercial or courtesy practices, or that is, however, aimed at acquiring or granting favorable treatment in relation to any activity linked to Fastweb.

General principles established by Model 231 and the provisions of internal company procedures have to be applied (Gifts Policy, available at the link:

<https://agora.fastweb.it/sezioni/policy-hc>, Anti-corruption Directives, available at the link:

<http://processi.agora.fastweb.it/index.php?sid=136>).

In any case, Fastweb abstains from practices that are not permitted by law, by the ethical codes of the companies or entities which it has relationships with, if known, or more

generally from any conduct that may damage its reputation. Generally, Fastweb's tributes aim at promoting its image. Advantages offered (gifts, invitations to lunch / dinner, invitations to events) - except for those of insignificant value up to € 150,00 - are adequately documented and are managed in accordance with the provisions of the Anti-corruption Directives.

Fastweb employees who receive gifts (up to the value of € 100,00) give notice to the direct manager and apply the provisions set forth in the Gifts Policy. Each Team is responsible for filing sufficient supporting documentation to enable the Supervisory Body to carry out checks, if necessary.

6.8 Relations with external stakeholder: customers and suppliers

Fastweb, in line with the commitments taken with the adoption of the Code of Ethics, carries out its mission by developing relationships with stakeholders (customers, suppliers, consultants and other partners who provide their services to Fastweb within the limits of their respective contractual relationships) in respect of integrity and transparency principles.

In dealing with customers, Fastweb's behavior is based on fairness, willingness and respect, in order to a highly professional collaborative relationship.

In relationships with suppliers, consultants and other partners, the purchasing processes are based on the pursuit of a legitimate competitive advantage for Fastweb, the granting of equal opportunities for each supplier, loyalty and impartiality.

In particular, employees are required to adopt objective, documentable criteria when selecting suppliers, consul-

tants and other partners. The choice of suppliers and the determination of purchase conditions must be based on an impartial assessment of the quality, price and capability to provide and guarantee adequate level services.

Fastweb does not make illicit payments through agents, consultants and intermediaries.

Fastweb verifies experience and technical requirements and may pretend the declaration of none investigation/ judicial proceeding related to corruption practices.

Any company / person operating as a representative of Fastweb is required to sign a declaration of commitment to comply with the provisions of the Code of Ethics and of the 231 Model, whose violation allows the immediate termination of the contract.

Economic compensations to stakeholders must be based



on adequate accounting documentation which allows to verify the consistency of the performance with the contractual provisions.

In order to avoid from being held responsible for illegal activities committed by its suppliers, consultants and other partners, Fastweb requires them to be compliant with these Guidelines, as well as with the relevant legislation in force for preventing corruption.

Fastweb states to make payments to business partners exclusively by means of modalities provided in the respective contracts.

In order to minimize behaviors contrary to the Guidelines or, in any case, illicit, Fastweb requires to provide in con-

tracts to be signed with third parties a clause of responsibility of the counterparty, by means of which this one undertakes to act in compliance with the laws, the Code of Ethics, the Guidelines and other corporate policies of Fastweb. According to this clause, Fastweb has the right to terminate the contract, to stop payments and to receive compensation for damage, in case of violation by the counterparty of the obligations assumed in this regard.

With regard to consultancy contracts, Fastweb has defined in the 231 Model (General Part) specific control principles to be adopted in the selection, signing and management of these contracts, in order to ensure that relations with third parties, pending the business activities, be based on the criteria of fairness and transparency.

6.9 Human resources management

In order to guarantee maximum transparency and integrity in human resources , recruiting activity³, Fastweb has provided that:

- research and selection of human resources are managed in compliance with the principles of non-discrimination, professionalism, transparency, impartiality, autonomy and independence of judgment, such as to ensure that the final choice falls on the most suitable subjects to hold the position on vacancy and represents an offer consistent with the values of the reference market, by guaranteeing equal access to job opportunities;
- candidates are examined by more than one person and the results of the entire evaluation process are adequately tracked;

- selected candidates are required to sign a declaration of commitment to comply with the provisions of the Code of Ethics and the 231 Model.

The Human Capital team carries out strict controls on the subject regarding (a) any criminal records and (b) any civil or administrative sanctions or ongoing investigations that refer to unethical or illegal activities, according to applicable laws and (c) any personal relationship with Public Officials or stakeholders (customers, suppliers, consultants and other partners who operate with Fastweb within the limits of their respective contractual relationships) and verifies that (d) during last three years, none authorizing or negotiating power on behalf of the public administrations or contracting authorities, towards Fastweb, towards the sole shareholder Swisscom Italia S.r.l. and towards the subsidiaries has been performed by this.

³ All activities and phases that lead to the recruitment of new staff (both managers and employees), including temporary workers, trainees and scholarship recipients.



Approval, Anti-corruption Officer, communications and training

7.1 Approval and Anti-corruption Officer

The Fastweb **Anti-corruption Guidelines** are approved by the Fastweb Board of Directors and must be respected by all (internal and external) recipients. Any changes to these Guidelines are subject to approval by the Board of Directors.

The Board of Directors has also appointed the Anti-corruption Officer who is responsible for the implementation and the monitoring of these Guidelines. The Anti-corruption Officer is autonomous and independent, responds to the

Chief Audit Executive and is supported by the Internal Audit team, Risk Management & Supervisory Body 231. Powers and duties of the Anti-Corruption Officer are indicated in the resolution of the Board of Director dated April 24, 2018. If clarifications are needed with respect to the content of the Guidelines or information for the application of the policies therein provided, the (internal and external) recipients must contact the Anti-corruption Officer: anti-corruzione@fastweb.it.

7.2 Communications

The Guidelines are divulgated to the staff through the internal communication tools and can be consulted on the company intranet (Agorà).

Furthermore, the Guidelines are available to all (internal and external) recipients on the institutional website www.fastweb.it.

The general conditions of supply, accepted by all suppliers, consultants and other partners who provide services to Fastweb within the limits of their respective

contractual relationships, during the accreditation phase, make express reference to anti-corruption.

The initiatives carried out for the implementation of the Guidelines are reported in the Sustainability Report (section "Ethics and Compliance"), which states in a clear, truthful and correct manner the results obtained by Fastweb for economic and social development, and for the digital transformation of Italy. The Sustainability Report is subject to external verification by an accredited independent company.

7.3 Training

The training is compulsory and aims at spreading anti-corruption issues as well as the risks connected to Fastweb activities. The training is carried out by Human Capital in collaboration with the Compliance & Risk Department, the SB and the managers of the other internal offices involved from time to time in the application of the Guidelines.

In light of divulgating the effective knowledge of anti-corruption legislation and of the Legislative Decree 231/2001, training activity is provided with different modalities, con-

tents and methods of implementation, according to the qualification of the recipients, the level of risk of the area in which they operate, the performing representation duties and the attribution of any powers.

Every two-year, compulsory e-learning training courses are provided to all staff in order to ensure the dissemination and correct understanding of the Guidelines. In addition, classroom sessions are organized, on an annual basis, for employees who work in sensitive areas.



Control activities and reporting

8.1 System of internal control

All Fastweb resources (Management Board, managers and all employees) are committed to contrast corruption. More specifically, each team is responsible, for what of its competence, for the preparation of adequate control systems useful for the implementation of these Guidelines.

Each member of the Management Board, managers and all employees must contribute to the implementation of an effective and efficient internal control system. For this reason, consequently, all the members of the Mana-

gement Board, the managers and the employees, within the scope of the functions performed and the respective duties, are responsible for the proper functioning of the control system.

For more information on the internal control system of Fastweb and its related players, please refer to the Agora section, link: <https://agora.fastweb.it/sezioni/i-level-li-di-controllo-e-gli-attori-del-system-of-control-of-internal-fastweb>

8.2 Second level controls

The second level control activities are carried out by the Compliance, Risk Management and Assurance offices, that cooperate for the definition of methodologies aimed at eva-

luating/assessing the risk of compliance with these **Guidelines**, by identifying suitable procedures for the prevention of the risks identified and requesting their adoption.

8.3 Audit

The third level control activity, i.e. the audit, on what has been carried out by the various teams for the implementation of the **Guidelines** is entrusted to the Internal Audit team.

The Internal Audit, through a professional, systematic approach, provides analysis, evaluations, recommendations on the Internal Control System (ICS) associated with

corporate procedures subject to verification, with the aim of improving the processes of control, risk management Corporate Governance.

The Independent Audit Committee assesses the adequacy of the periodic audit plan, also verifying the provision of interventions aimed at ensuring the supervision of these **Guidelines**.

8.4 Reporting

In compliance with the applicable anti-corruption regulations, Fastweb's managers and employees are required to report to the direct manager, the Human Capital and the Supervisory Body at the beginning of the relation and during the course of it, any existing relationship of kinship or affinity (including spouse and cohabitant) with managers and / or employees of the Public Administration or of any body involved in public tenders.

All (internal) recipients are required to report the violations of which they become aware - and to clarify whether the reported violation is limited to a suspicion and not to a

certainty - about the commission of the violation of these Guidelines, the Code of Ethics, the 231 Model as well as any corruptive behavior that they have come to know in reason and on the occasion of their employment relationship or the functions performed.

Communications must be made, in respect of privacy, through the appropriate channel on the portal <https://agora.fastweb.it/sezioni/whistleblowing-di-cosa-si-tratta-e-come-signalare>

The report is evaluated according to the "Whistleblowing



Policy: management of reports", available at the link: <http://processi-agera/index.php?Sid=182> (hereinafter referred to as the Whistleblowing Policy).

No one can be fired, suspended or discriminated in any way on workplace for having performed in good faith any reporting activity regarding the failure to comply with the provisions of Fastweb.

Should a gross negligence or willful misconduct be committed by the reporter in denouncing a violation of the above provisions which turns out to be unfounded and untruthful, he will be subject to the disciplinary sanctions referred to in par. 9 below

Employees can report by web facts or events even if they are not totally sure about. The link to the reporting form is accessible on the intranet and / or from the public internet network anywhere and at any time. The reporting form can be sent anonymously. To simplify the management of the report the sender can include his contact information (this information is not mandatory).

The reporting via web reporting system is received simultaneously by the Head of VR-IA, the FASTWEB's Head of Internal Audit (IA FWB) and the Head of GSB (Group Strategy and Board Services) and is treated in strict confidentiality.

Disciplinary system

In particular, Fastweb shall adopt measures of oral reprimand, written warning, fine (up to the value of 3 hours of salary), suspension from work and pay (up to a maximum of 3 working days), dismissal, depending on the severity of the behavior of the employees:

- whom actions will breach the anti-corruption laws, these **Guidelines**, the Code of Ethics, the 231 Model and all other national regulations (for instance the Leg. Decree no 231/2001),
- who not attend or not conclude compulsory training courses,

- who omit to detect or to report violations or threaten or adopt retaliation initiatives against others reporting violations,
- who report through fraudulently or with gross negligence violations revealing to be groundless and untrue.

Fastweb shall adopt appropriate measures - including but not limited to the termination of the contract and the claim for damages -, towards other stakeholders (suppliers, consultants and other partners who provide their services to Fastweb within their respective limits under negotiation relations) whose actions are found in violation of the Anti-Corruption Laws, the Code of Ethics, the 231 Model and these **Guidelines**.

Entry into force

The provisions of these **Guidelines**, approved by the Board of Directors on 26 of July 2018, will enter into force following its divulgation.



FASTWEB
un passo avanti