

CODE OF ETHICS



FASTWEB

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Message from Alberto

Fastweb has always been committed to pursuing its vision and achieving its business objectives in an ethically responsible manner, with the utmost transparency and integrity. For this reason, we decided to become a Benefit Company.

Enabling people and organisations to grow, improve, connect with the future, simply: this commitment is one of the factors of our success.

We pursue the important goal of raising Italy to the next level through digitalisation, viewed as a bridge to a more sustainable future.

Everyone's contribution is therefore fundamental: it is our decisions and our behaviour that determine the entire company's actions.

It is therefore fundamental that we work together to build trust in our company, consolidating and strengthening our commitment to ethical conduct.

Our Code of Ethics helps us identify the most correct behaviour in compliance with the law and our values, in accordance with the highest standards of ethics and professionalism.

I thus invite you to read it carefully, to apply what is written and to use the information and resources available to make increasingly informed decisions.

It is up to us to embrace the principles contained in this document, to apply it responsibly, and to comply with the policies it contains. Because ethical behaviour represents who we are.

Alberto Calcagno
Chief Executive Officer and General Manager



How to apply the Code of Ethics

The **Fastweb and Fastweb Air** Code of Ethics is inspired by the United Nations Universal Declaration of Human Rights, the ILO (International Labour Organization) Fundamental Conventions and the **OECD Guidelines** for Multinational Enterprises, and lays out the principles that are to inspire the actions of all those who work for Fastweb (employees, suppliers, consultants and business partners) so that business objectives are pursued in an ethical, sustainable way.

Adopting a Code of Ethics for Fastweb people means having a guide to help them make decisions and act in accordance with the values and rules of regulatory compliance that the company has adopted.

It is our responsibility

- ▶ To be familiar with it and comply with its provisions.
- ▶ To help spread it.
- ▶ To ask for support when in doubt.

The Code of Ethics cannot foresee every specific behaviour or situation, but it does establish criteria of conduct to be observed and applied according to the rule of common sense.

In **relations with third parties**, whether of a commercial, institutional, social or any other nature, it is essential:

- to promote awareness of the guidelines contained in this Code of Ethics
- to envisage conduct that does not conflict with the Code for the execution of assignments or contractual obligations.

In some situations, acting ethically can be complex. In order to understand the correct behaviour consistent with our values and principles, it may be useful to answer the following questions:

Ethical Questions

- ▶ **Does it comply with the policies and principles of the Code of Ethics?** Am I sure this is legal and in compliance with our internal policies?
- ▶ **Could it harm Fastweb's reputation?** Could spreading this information have adverse impacts on the company's image?
- ▶ **Is it in Fastweb's best interest?** Can my decision create a conflict between my personal interest and that of the company?
- ▶ **Could this behaviour damage Fastweb end customers?** Has everything been done to reduce risks to the detriment of Fastweb or its end customers?

If the answer to the Ethical Questions is "no" or "I don't know", refrain from acting and consult the relevant sections of the Code or of the policies.

If you are still unsure about what to do, ask your line manager, your HR Business Partner or the Compliance team for support. In regard to choices with an impact on data protection, consult the Data Protection Team.

Company Purpose, Vision and Values

Fastweb owes its success and ability to meet the challenges of the market to the Purpose, Vision and Values it shares with its employees, who strive to uphold them every day.

Purpose, Vision and values are renewed to reflect social and technological changes and are the expression of a company that is constantly evolving and that looks to the future with confidence, ready to continue its leading role in the **digitalisation of Italy**.

The Fastweb Purpose is:

Helping everyone to build their future with confidence, You Are Future.

Through "You Are Future", Fastweb redefines its identity through a new strategic vision. This vision brings the people at the center, to support everyone to be part of a Future redesigned by the ongoing digital transformation. It is a renewed commitment that includes the development of the key infrastructures for the country digitalisation and the pursuit of the highest standards of social responsibility and environmental sustainability. The objective is to help everyone to build their Future, with confidence.

Fastweb envisions and commits to the digital realization of a Future that is better connected, inclusive, and

sustainable. This is built day by day, through: high-performance networks at gigabit speeds and innovative services; digital skills broadcasting and promotion; the development of an inclusive culture that values the peculiarities of every person and nurtures talents; the alignment to best international standards to contribute to the fight against climate change.

The ambition moving Fastweb towards the Future finds its roots on the shared Vision and Values by which the company and its employees are inspired. They are expression of a company that is continuously evolving to maintain its leading role in the digital transformation of the country.

The Fastweb Vision is:

Together we connect the future, simply.

Achieving such a forward-looking goal naturally requires a business plan to which everyone, regardless of role and function, must contribute. These business objectives can only be achieved if everyone works together, inspired by common, shared values.

Our values are a shared asset to which we all contribute in our daily work and for which we are all equally responsible.

Our values inspire behaviour that has an immediate reflection inside and outside Fastweb.

Fastweb Values

CARE

We make decisions with our customers' interests in mind

We take care of our workers

We take care of ourselves

COURAGE

We are digital

We are leaders

We are entrepreneurs

SUSTAINABILITY

We create value for the company

We invest in individuals and the community

We make sustainable choices for the environment

Benefit Company

From January 1st, 2022, Fastweb became **Benefit Company**.

As a Benefit Company, Fastweb pursues the goals of common benefits and the development of a more sustainable, inclusive, connected future.

Fastweb aims to have a positive impact on the people and the communities through: the support to the availability and use of high-performance networks towards fostering technological empowerment and digital literacy; the promotion of digital skills and the establishment of an inclusive culture, through the support to the growth and nurturing of talents; the

promotion of solutions that create a positive impact in the field of telecommunication and telephony system development, that minimize environmental impacts of the physical infrastructures and contribute to the fight against climate change; the promotion of the involvement of its employees in the pursuit of company goals, as well as of their work, personal and family well-being.

It is each employee responsibility to take decisions and to act in a consistent way, with respect to the goals of sustainability and common benefit.

Our commitment to integrity and transparency

1 Principles of Integrity and Transparency

Fastweb people are guided by the highest **principles of integrity, honesty and transparency** in carrying out their duties.

Directors, executives and employees are required to comply diligently with applicable laws, the code of ethics and internal policies by always adopting a high standard of business ethics. Under no circumstances may the pursuit of a legitimate interest of fastweb justify illegal or dishonest conduct.

Fastweb adopts organisational tools to guarantee compliance with the law and promotes maximum transparency in managing agreements and communications with customers, suppliers, business partners and public bodies.

What it means for me

- ▶ Always be truthful and refrain from making false, incorrect or misleading statements or providing distorted information.
- ▶ Do not make false, misleading or disparaging statements about a competitor, its products or services. Instead, emphasise the benefits of fastweb's products and services in an accurate, non-misleading way.
- ▶ Share requests for information or documents from the public administration or public bodies with your line manager and the relevant functions to ensure that fastweb's answers meet all legal requirements and fastweb's rights are guaranteed.

2 Conflicts of interest

It is important to disclose conflicts of interest and external assignments to protect our Company's interests

In every role we make decisions that must exclusively pursue Fastweb's interests and must not be influenced by personal interests.

In order to ensure objectivity, transparency and fairness in corporate decision-making processes, each of us is required to promptly report any situation that may give rise to a potential conflict between our personal interests and those of the company.

QUESTIONS

When do we have a conflict of interest?

- ▶ If we pursue an interest other than the company's objectives.
- ▶ If we "personally" take advantage of a Fastweb business opportunity.
- ▶ If we handle activities that may affect independence and objective decision-making in assessing Fastweb's best interests.

Situations to be avoided at all costs:

- ▶ Carrying out external activities that compromise our ability to devote time and attention to the role and tasks we perform at Fastweb.
- ▶ Promoting sponsorships or donations to associations

or initiatives involving us (or persons close to us or associated with us).

- ▶ Hiring or managing a relative or partner.
- ▶ Hiring a person so that Fastweb can benefit from his or her relationships with the political world, the public administration or business partners.
- ▶ Entering into a relationship with a supplier, customer or competitor for personal gain.

Situations to be assessed appropriately (potential conflicts of interest):

- ▶ Existence of economic interests of employees or close relatives in Fastweb's business activities or in the activities of customers, suppliers or competitors (including parent companies and subsidiaries).
- ▶ Performing administrative or control roles, or other offices or positions of any kind, in other companies.
- ▶ Holding political office.
- ▶ Occupying of roles or positions in associations or public bodies with which Fastweb may have commercial or business relations.
- ▶ Performance of work activities for customer companies, suppliers or partners.
- ▶ Performance of work activities for customer companies, suppliers or partners.

What should we do in such cases?

We should refrain from the conduct in conflict or activities that could influence our decision-making independence and promptly report the situation to our direct manager, Human Capital and the Supervisory Body so that any incompatibilities or adverse situations may be assessed.

Remember: Failure to disclose a conflict of interest situation may result in disciplinary action (see the section "Disciplinary System").

Finally, all employees are required to report, at all times, to their direct manager, Human Capital and the Supervisory Body, all situations of conflict of interest, actual or

potential, that may arise between them, their relatives, relatives-in-law, spouse/cohabiting partner and personnel of the Public Administration or of any entity that holds public tenders.

Read more at:

- Conflicts of Interest Procedure
- Anti-Corruption Guidelines

In case of doubt, contact:

- HR Business Partner
- Compliance

3 Ethics in business relations

We ask our partners to share our principles of integrity

We work according to the **principles of integrity** and **intellectual honesty** and we strive to ensure that our suppliers and business partners work with us according to the same principles.

In our agreements with suppliers, consultants and other partners, we seek a legitimate competitive advantage for Fastweb, equal opportunities and a relationship based on fairness, honesty, efficiency and professionalism.

Although Fastweb does not exclude certain types of customers, suppliers or partners, it does not have any direct or indirect relationships with persons belonging to criminal organisations or operating outside the law, such as persons linked to money-laundering, drug-trafficking or usury.

We require our suppliers to be committed to the protection of human rights, to abide by labour laws and to comply with legislation on health and safety, environmental protection and data protection.

In order to strengthen our commitment to the prevention of offences pursuant to Legislative Decree no. 231/2001,

our contracts include clauses to spread awareness of Fastweb's **Code of Ethics** and **231 Model** and a declaration of commitment by the counterparty not to behave in violation of these documents.

What it means for me

- ▶ During the negotiation phase, verify the other party's willingness to comply with our **Code of Ethics** and pledge not to violate the principles laid down in this Code.
- ▶ Start the **qualification** process in promptly in accordance with the relevant policy.
- ▶ Ensure that in rendering services suppliers, consultants and partners are committed to full compliance with Legislative Decree 231/2001 by accepting our standard 231 clauses.

Read more at:

- Supplier Qualification Procedure

In case of doubt, contact:

- Procurement & Supply Chain
- Compliance

4 Prevention of money-laundering and tax crimes

Fastweb undertakes to apply controls for administrative and accounting obligations and to apply organisational measures to promote **transparency and traceability** in the management of financial flows.

Before entering into partnerships or contracts with non-regular customers/suppliers, it must be ensured that

the other party's activities are fit and proper in order to prevent our services from being used for illegal purposes. If you suspect that current or potential customers may be using our services for illegal activities or questionable transactions you should consult the Fraud Management team or Internal Audit team.

5 Fight against corruption

In relations with both public and private parties Fastweb adopts a zero-tolerance policy towards corruption, which it rejects in all its forms, while implementing a proactive programme to combat and prevent it

Each of us is personally called upon to comply with anti-corruption laws and has a duty to disseminate and transfer the principles of **legality, integrity and fairness** through our own conduct, respecting the system of policies defined to prevent corruption.

Fastweb accepts and adopts the notion of corruption provided by **Transparency International**, of which it is a member: corruption is "the abuse of entrusted power for private gain".

To reiterate its effective commitment to the fight against corruption, Fastweb has proactively and voluntarily adopted **Anti-Corruption Guidelines**, which are a tool for summarising and optimising the internal policies through which the system for preventing and monitoring corruption is strengthened.

Remember: offering or receive bribes, including through third parties, is strictly prohibited.

A bribe is defined as "the offer or receipt of any kind of gift, loan, fee, compensation or other advantage to induce the commission of a dishonest, illegal act in the conduct of business affairs"

In order to guarantee the effectiveness of this system, Fastweb adopts **the principle of separation of responsibilities** according to which tasks, operational activities and control functions must be adequately separated, so that the person responsible for operational activity is distinct from the person who supervises and authorises it.

What it means for me

- Ensure that all payments to and from third parties are appropriate, supported by documentation and properly recorded.

- Consult and comply strictly with the policies for transactions that involve relations with the Public Administration, observing the roles of the responsible company structures.
- Declare any relationship of kinship and/or affinity with executives and employees of the public administration and/or contracting authority.
- Immediately inform the Supervisory Body (organo. vigilanza@fastweb) and the Anti-Corruption Officer (Anticorruzione@fastweb.it) of any direct or indirect request aimed at obtaining payments or other benefits in exchange for advantages.

What it means for me

I am working on a project that requires public concessions but I am behind schedule. A regular supplier of mine informs me that he has obtained permits in a short time with the intermediation of a consultant and offers to put me in touch with the consultant, who could expedite my application. Can I accept?

It is a risky situation; paying fees to facilitate or obtain advantages from public bodies is prohibited.

Read more at:

- Anti-corruption Guidelines
- Gifts Policy
- Sponsorship Procedure
- Donations Procedure
- Anti-Corruption Directive
- Anti-Corruption Directive Invitations to Events

In case of doubt, contact:

- Anti-Corruption Officer
- Compliance

6 Gifts, presents and hospitality

Our policies do not allow the receiving or giving gifts, presents and hospitality that may be construed as exceeding normal business or courtesy practices, or aimed at acquiring or granting favourable treatment in the conduct of activities related to Fastweb.

Gifts of modest value may be offered to promote the image of the company or to promote charitable or cultural initiatives.

Receiving gifts from a supplier is not prohibited, but you must notify your line manager so that he or she can make the appropriate assessments, according to the policies.

RULES OF CONDUCT

- ▶ Offering **gifts, presents and hospitality** to Public Administration personnel or their family members is prohibited, except for acts of commercial courtesy of modest value (up to €150).

- ▶ Any form of gift to public officials or their relatives that could influence their independence of judgment or induce them to provide any advantage for the company is prohibited.
- ▶ Cash gifts are prohibited.
- ▶ Only gifts of modest value (up to €100) may be accepted in accordance with the Gifts Policy.

Read more at:

- Gifts Policy
- Anti-Corruption Guidelines
- Anti-Corruption Directive

In case of doubt, contact:

- HR Business Partner
- Anti-Corruption Officer
- Compliance

7 Relations with the Public Administration

Fastweb's relations with the local, national, EU and international Public Administration are inspired by the strictest compliance with the law and the principles of correctness, transparency and loyalty.

Remember that during business negotiations, inspections, audits or other dealings with the Public Administration, **it is prohibited:**

- ▶ To privilege or propose employment opportunities to the Public Administration personnel involved.
- ▶ To offer, accept or encourage gifts, presents or other benefits to Public Administration personnel or their family members, except for acts of commercial courtesy of modest value.

- ▶ To solicit or obtain confidential information in violation of equal treatment and procedures of public record.
- ▶ To accept requests for contributions/sponsorships/donations that may influence business negotiations or favour Fastweb.
- ▶ To give or promise money or other benefits as a result of requests and/or undue pressure from public representatives.

In case of doubt, contact:

- Anti-Corruption Officer
- Compliance

8 Fair competition

Free competition and consumer protection are values that Fastweb is committed to promoting

We promote compliance with competition and consumer protection laws as fundamental values and an integral part of our corporate culture through an Antitrust Compliance program that meets the highest standards of applicable laws and international best practices.

In our relations with competing operators we act in full respect of the principles of the free market and competition and we do not enter into agreements or understandings that could alter the correct competitive dynamics.

Fastweb is organised to provide the national Antitrust Authority (AGCM), European Antitrust Authority (EU Commission) and all other competent authorities (AGCOM, Data Protection Authority and ANAC) with any information they may request and to cooperate with them in any investigation or pre-investigation proceedings.

RULES OF CONDUCT

- ▶ Exchanging confidential information that reveals business strategy is prohibited: do not ask and do not receive.
- ▶ Carefully manage temporary consortium or subcontracting agreements with competing companies for participation in tenders.
- ▶ Pay attention to the exchange of information and decisions taken within trade associations.

- ▶ Ensure full transparency of information on commercial offers to consumers.

What it means for me

A salesman from a competitor that has a portfolio of customers in the same geographical area as mine proposes that we make an agreement to offer services by dividing up business customers.

Is this an acceptable arrangement?

No, it is an anti-competitive arrangement because it reduces competition in a particular geographic area.

Remember that even our regular suppliers can be competitors and always ask if the information you exchange is confidential and related to business strategies (prices, number and type of customers served, future plans, etc.)

Read more at:

- Antitrust Guidelines
- Antitrust Code of Conduct
- Procedure for Participation in Trade Associations

In case of doubt, contact:

- Antitrust Officer
- Antitrust & Operator Relations Team
- Compliance

9 Accounting Transparency

Transparency and correctness of accounting records are primary objectives that we achieve with everyone's commitment and attention

Fastweb prepares its financial statements and all corporate communications with the utmost correctness and in full compliance with the reference legislation and accounting principles, to provide clear, precise, true and complete information.

Each of us has a duty to contribute to the proper representation of management activities by accurately recording each operation and transaction and ensuring that it is supported by adequate documentation. At all times it must be possible to verify the characteristics of the operation and the relative decision-making and authorisation process.

What it means for me

- ▶ Always check the veracity of the documents that are entered into the accounting records.
- ▶ Carefully archive the basic documentation for each accounting entry.
- ▶ Report instances of falsifications or errors in records or underlying documentation that come to your attention.

Remember: Making any kind of payment in the interest and on the behalf of Fastweb without proper documentation is prohibited.

In case of doubt, contact:

Administration

10 Internal Controls

Fastweb promotes a positive culture towards the implementation and the performance of controls.

Fastweb proactively created its **Internal Control System** to monitor the effectiveness and the efficiency of company processes and systems; to verify the compliance with laws; to ensure credibility and integrity of accounting and management information; to protect corporate assets, data and information.

In order to ensure effective internal controls, Fastweb adopted a three-level system that includes all corporate departments, employees and functions – from operations to governance and independent control structures.

The controls are integrated into daily corporate activities. Each employee contributes to the creation of an effective and efficient internal control system by being responsible for it within the scope of the activities performed. All employees commit to transparent conduct, ensuring that every operation and/or activity is documented and verifiable, as well as consistent with corporate rules and procedures.

Procedures must be defined in such a way as to allow controls on operations, on authorising processes and on the implementation of the activities conducted.

All employees are required to cooperate and guarantee to the control functions and bodies access to data, documentation and any information useful for the performance of internal control activities.

For more information see

- The Internal Control System Guidelines

In case of doubt contact

- Internal Audit
- Data Protection
- Compliance

11 Artificial Intelligence

We promote the responsible use of Artificial Intelligence (AI) solutions.

AI solutions must generate **benefit to people**, promoting an inclusive growth and a sustainable development, because people interests come first.

In order to guarantee an **ethical** and **reliable** use of AI, we defined some principles inspired from the OSCE Guidelines and the draft European regulation (AI Act).

Our Principles:

- ▶ We manage Artificial Intelligence systems in **respect of the law** and to ensure the respect of **human rights**, without limiting or undermining the autonomy of people.
- ▶ We protect **personal data** processed by AI systems, with respect of privacy by design principles and by adopting the most recent security measures, with the aim to prevent negative impacts on rights and

freedoms of interested parties.

- ▶ We resort to the use of the AI on the basis of communications, clear information and **transparency**, so that AI services are understandable and recognisable.
- ▶ We envisage the centrality of human intervention because it is **people** who decide and are in **control**.
- ▶ We verify a secure functioning of AI applications through processes of **evaluation** and **potential risks** management.

In case of doubts contact:

- Artificial Intelligence COE
- Compliance
- Data Protection

Our commitment to people

Our values guide us to act with integrity and transparency in everything we do

- to create an **inclusive environment** in which people feel valued and treated with fairness and respect
- to guarantee working conditions consistent with the company values expressed in the Code of Ethics
- to protect **equal opportunities** for professional growth and advancement

Protecting human rights and workers' rights generally is a guiding principle for us: we only work with parties who protect and respect these rights. We encourage constructive dialogue with labour unions and business and trade associations.

Fastweb guarantees all employees remuneration in line with the provisions of national regulations and collective contracts, ensuring that salaries are set according to objective criteria. Fastweb guarantees its employees an adequate rest period in compliance with the regulations

in force on working hours.

Fastweb respects the rights of workers to adequate representation and the freedom to set up and/or join workers' organisations or trade union representatives, without fear of retaliation or intimidation. We are therefore committed to establishing a constructive dialogue with the employees' elected representatives based on mutual respect and open, collaborative communication.

Relationships between people at Fastweb are based on mutual respect. **We do not tolerate** any form of discrimination, verbal, physical, sexual or psychological harassment or abuse, threat or intimidation in the workplace, in compliance with the Framework Agreement on Harassment and Violence in the Workplace signed between Asstel and the trade unions. We pursue the **principle of inclusion** of all employees through our policies.

1 Selection and work environment

Fastweb abides by labour and employment laws and promotes equal employment opportunities. We are therefore committed to promoting practices that do not involve or support the use of child, forced or compulsory labour.

In the search for new people to be hired, we base our decisions on merit, skills and adherence to company values to ensure fairness and transparency in the selection process.

2 Diversity and Inclusion

We aim to connect Italy and create a safe, inclusive place where people can proudly express their uniqueness

We believe that diversity drives evolution: it is from the meeting of our differences that new value is created. This is the culture we are spreading and now, when society is also increasingly attentive to these issues, we are committed to even more ambitious objectives, stepping up our sustainability initiatives in various areas: from disability to support for caregivers, from gender equality to the development of women's **STEM** skills, with a particular focus of internal awareness of **Diversity**

& Inclusion issues.

We do not tolerate any form of discrimination in hiring, compensation, promotion, access to training, termination or retirement.

We do not allow discrimination on the basis of age, gender, disability, gender identity, sexual orientation, marital status, family responsibilities, cultural background, creed or political opinion.

We also combat all behaviours that give rise to

harassment or bullying. We believe that a truly inclusive approach can only be achieved by creating a corporate culture based on knowledge, tolerance and the promotion of the richness of diversity.

With this in mind, we organise sensitivity training meetings, a method that helps develop attention to others and greater sensitivity to group dynamics.

Because diversity is a fact, but for us inclusion is a choice.

What it means for me

► In your relationships with colleagues, customers, suppliers and stakeholders, always act with respect for people and diversity.

► You too can help ensure an inclusive work environment by fighting all forms of discrimination or harassment.

► If you suspect discriminatory behaviour or inconsistent practices, investigate with the people concerned, including HR Business Partners, and if your suspicions are well-founded, report them through the dedicated channels (see the section on reporting violations).

Read more at:

Diversity & Inclusion Policy

In case of doubt, contact:

- Corporate Culture & Inclusion
- HR Business Partners

3 Health and Safety

Workplace safety is always our first priority

"Safety First" clearly and decisively represents Fastweb's desire to set a strong tone for its organisation by effectively applying the principles of the regulations in force on **health** and **safety** in the **workplace**.

We are actively committed to protecting and preserving the fundamental values that inspire these regulations, through preventive actions and specific safeguards, as well as the constant management of risks in this area.

We are committed to guaranteeing health and safety standards aimed at protecting the physical and moral integrity of employees and workers who cooperate with the company in various ways, ensuring safe and healthy working environments and working conditions respectful of individual dignity.

In fact, the Company seeks to operate in accordance with the safety of its employees and third parties in general, preventing or reducing accidents and mitigating any harmful effects, in full awareness that the safety and mental and physical well-being of workers are indispensable resources at work and protecting them merits adequate commitment and attention over time.

To this end, we also promote the involvement of all levels of the organisation and the creation of an environment of open sharing and participation.

The company is committed to spreading a culture of worker safety and health protection as an integral part of

the efficiency of its activities, through continuous training, viewing the involvement and awareness of all employees as fundamental objectives to strive for.

Each of us is obliged to comply with the obligations deriving from accident prevention regulations and to refrain from imprudent or negligent behaviour that may constitute a reason for risk or danger of events harmful to the physical and psychological integrity of ourselves or others.

What it means for me

► *Listening to each other:* everyone, regardless of their role, must contribute to creating an environment of constructive dialogue between colleagues. In this sense, abiding by the company's safety procedures means analysing the various work behaviours and assimilating their contents in order to improve them and make them safer.

► *Sensitivity and attention:* we nurture respect for the work of others, paying close attention to how we go about our work and carry out various activities; safety in the workplace depends on a commitment by everyone.

► *Trust:* trusting others may not always be easy, but it is the only way to work together and ensure a harmonious work environment, make the most of our time at work and go home feeling good about ourselves.

► *Respect and collaboration:* respect for protocols and procedures is a fundamental aspect of ensuring health and safety in the workplace and limiting events

harmful to one's own safety and that of others through mutual collaboration in the interest of the company's activities and the well-being of everyone.

- ▶ **Timeliness:** it is the duty of each of us to promptly report potentially dangerous situations and thus allow us to intervene with corrective actions in order to

reduce any emerging risks.

In case of doubt, contact

- Health & Safety

4 Wellbeing

Several years ago, Fastweb introduced an innovative **wellbeing** model:

Fast4me, il Wellbeing@Fastweb, is built on listening to people and is oriented towards offering greater **flexibility** in the **work/life balance** and concrete **economic support**, with a particular focus on **health, prevention, education** and **family** needs.

Wellbeing initiatives are available to the **entire** corporate **population** and offered **free of charge**.

Wellbeing@Fastweb is designed to provide **answers to real needs**, contributing concretely to the **well-being of each person** and supporting them in building their **future**.

In case of doubt, contact

Wellbeing, Employer Branding&Talent Acquisition

5 Protection of Company Assets

Each employee is responsible for protecting the company's assets, safeguarding Fastweb's movable and immovable property, IT devices and information.

What it means for me

- ▶ Use company assets carefully and attentively and avoid improper or wasteful use.
- ▶ Respect company policies and apply common sense rules to prevent theft or damage to third parties.
- ▶ Keep confidential information about the company or business partners confidential.

Our commitment to respect the environment

Sustainability and environmental protection are now key drivers that guide our strategies and projects. Digitalisation and sustainability are increasingly integrated into our vision: there is no digitalisation without sustainability and no sustainability without digitalisation

We are fully convinced of the importance that must be attached to respect for the **environment** and we are committed to reducing our impact on the planet and to protecting the ecosystem every day.

Our main commitment is the **fight against climate change**, to which we are seriously and steadily committed over time: this is why we have joined the Science Based Targets Initiative and have set our own targets for reducing emissions by 2030, in line with the Paris Climate Accords.

We comply with relevant legislation and have adopted environmental policies according to a management approach based on continuous improvement.

We are committed to purchasing electricity exclusively from **renewable sources**, to developing products and services that help our customers reduce their carbon footprint, and to developing and implementing plans to improve the energy efficiency of our network infrastructure and data centres.

Fastweb is a **plastic-free** company: whenever possible, we avoid the use of disposable plastic in offices and shops, during meetings and at corporate events.

We involve our employees and suppliers in spreading a culture based on the principles of environmental protection and sustainable development.

Is there a strategy for combating climate change?

Yes, we have set out a clear, long-term strategy to contribute to the global fight against climate change. You can find more information in the "Fastweb for the Climate" section of the corporate website.

You can also consult the **Sustainability Report**, published on the corporate website, to learn about

projects carried out and objectives for the future

Are there external bodies that have validated the choices made by Fastweb for environmental protection?

Yes, our carbon footprint reduction targets are approved by the Science Based Targets initiative, the environmental benefits of our services have been validated by Legambiente, and our environmental management methods are certified by an independent external body.

What it means for me

- ▶ Reduce energy consumption when possible: turn off your devices when not in use, set them to optimise energy savings, stop charging when completed and turn off lights when leaving a room.
- ▶ Prefer "soft" mobility, i.e. walking, scooters, bicycles or public transport. When this is not possible, use car-sharing services in your city or travel with a colleague.
- ▶ Avoid using disposable plastic as much as possible; bring your own water bottle to the office and use water fountains. Use your own personal cup for hot beverage consumption to reduce waste production. Always separate the waste you produce.
- ▶ Always consider the environmental impact that your choices may have in setting up business processes and in carrying out your work activities: choose the solution that best protects the environment and resources.
- ▶ In your private life, take your electrical and electronic equipment waste and spent batteries to the dedicated collection centres and avoid disposing of them in unsorted waste.

Read more at:

Environmental Policy

In case of doubts contact:

Sustainability

Our commitment to customer data

We care about the privacy of our customers: by choosing Fastweb, they entrust us with their personal data, and it is our job to take care of them

What Data Protection means

Fastweb considers the **protection of personal data** a **fundamental value** for conducting its business, building a relationship of trust with its customers and increasing hope in the digital society.

Due to the peculiar nature of the services it provides, both to residential customers and to business customers or public administrations, Fastweb constantly processes personal data.

It records them at the time of signing a contract, keeps them and processes them during the course of the contractual relationship in order to provide the service or send communications, and deletes or modifies them at the request of the data subjects.

Fastweb acts with the understanding that it does not own this personal data.

The data subject remains the owner and the company only processes the data incidentally and for a limited period of time.

During the limited time period in which Fastweb has access to the personal data of the data subject, whether internal or end **customers, fundamental principles** are followed: protect their confidentiality, integrity and availability and minimise their use as much as possible.

Only an operating strategy designed to guarantee and promote the protection of personal data and proper management of the personal data available to Fastweb can prevent damages, including culpable damages, to individuals and the penalties provided for by the law imposed by the supervisory authorities.

Our principles

✓ Transparency

It is essential to Fastweb that customers be informed of the processing of their personal data and that they never lose control of it.

This is why it is committed to preparing clear and simple, yet detailed, information as a priority.

Furthermore, in further pursuit of transparency, customer data are not shared without the customer being adequately informed and aware of the processing and the parties called upon to carry it out.

Finally, data are processed exclusively for the purposes indicated in the policy statements and according to the methods listed in them.

It is therefore essential that all processing performed be promptly entered in the company's Register of Data Processing and constantly updated.

✓ Fairness and Lawfulness

In order to combat illicit phenomena involving personal data, and first and foremost fraudulent access, sale or processing without appropriate consent, Fastweb devotes particular attention to data acquisition methods. The company carefully monitors the members of its sales network to ensure that they collect only the data necessary to provide their services together with the necessary consent to processing from the data subject.

✓ Privacy By Design & By Default

All projects that involves the processing of personal data are studied, from the design stages, so that privacy is considered an essential requirement, to be developed by default: the data must be protected at all stages of the activities through appropriate technical and organisational security measures.

✓ Minimisation and Need to Know

Process only the data necessary to achieve the purpose stated in the policy statement and only for the time necessary, through specific, detailed data retention policies.

Accountability is the principle that guides our actions, which is why it is essential to make the company accountable, starting with each employee, for the importance of proper processing of personal data: each of us is responsible for abiding by these principles, internally and externally, with our partners and suppliers. Furthermore, at Fastweb, responsibility is decentralised to the individual structures/teams through the identification of Data Managers, Ambassadors and Ad Hoc Competence Centres.

What it means for me

1) Follow company procedures for Design

Privacy is a requirement to consider in the design phase. Fastweb has a special process for assessing projects and identifying risks to data subjects from the design/concept stage.

Whenever you are involved in developing a project that for some reason involves the processing of personal data it has an impact on them, so remember to submit the request through the company assessment tool.

2) Consider privacy a constant setting

Our systems and processes are designed to respect privacy at every stage of the personal data lifecycle: we collect only the data we need, store it in an appropriate manner, and allow data subjects to exercise their rights.

3) Apply the principles to your role

It is important for us at Fastweb to give clear, specific instructions for each activity and process, as this is the only way to minimise risks.

Privacy policies and best practices have been put in place, together with specific awareness courses. Do not record, process or disclose the personal data of other employees or third party customers of which you become aware for reasons related to your office, otherwise you could face the administrative and criminal penalties provided for in Legislative Decree 196/2003, Articles 161 et seq. and 167 et seq., as well as the disciplinary penalties provided for by the National Collective Labour Agreement and any company regulations.

4) Minimise

Acquire and process only the data necessary and appropriate to achieve the intended purposes and according to the procedures provided. Keep data only as long as is necessary, ensuring that unauthorised third parties do not become aware of it

5) Communicate

Contact the Privacy Compliance Group or the DPO if you detect data processing not in accordance with the methods described in the policies or this document. Inform the privacy contact personnel in each BU of the start of new processing so that it can be tracked in the appropriate Register of Data Processing, which can only be correctly fed and updated with everyone's collaboration.

I have lost my company PC. What should I do?

As your company PC may contain personal data (yours or our customers'), it may constitute a data breach: any non-standard incident or event that compromises the Confidentiality, Integrity and Availability of Personal Data. Report the event by filling out the ad hoc form on the company intranet.

Can I also collect a mobile phone number to send a newsletter?

In accordance with the principle of minimisation, only data that is actually necessary for the predetermined purpose should be collected: a mobile phone number is not necessary to send a newsletter, so its collection does not comply with the principle of minimisation. Before collecting data always ask yourself: will I use this information? If so, why? Is it essential to achieving my purpose?

Can I give my login credentials to a colleague?

Although it may seem like a mere courtesy, it is important to remember that credentials are assigned on the basis of the principle of necessity and minimisation: each Processor may only access data relevant to the functions assigned. So if your colleague does not have credentials it is because due to his or her role he or she does not in fact need to view personal data. In the same way, always remember that it is not appropriate to extract and share personal data from the systems. In case of need to share information with other employees, always ask yourself whether they are entitled to see it, and whether there is an alternative way to achieve the same purpose without risking compromising personal data.

Also, remember that credentials are personal in order to track your activities: if you give away your credentials, any activity and possible misuse are associated with you.

In case of doubts contact:

Team Data Protection

Our commitment to responsible communication

1 External communication

At Fastweb, all external communication (customers, suppliers, stakeholders, financial community, industry authorities and press) is based on the principles of transparency and truthfulness and all requests for information are routed and addressed to the relevant departments and teams. Fastweb pays particular attention to communication with mass media, is managed by the External Relations & Sustainability Department, which provides timely, verified and punctual information that reflects the values and ethical principles laid down in this Code.

To this end, no employee may, without authorisation, make statements or provide information on products and services or provide confidential financial information; rather, employees may contact the External Relations & Sustainability Department, which will provide the requested information.

Fastweb also adopts the same principles of transparency and truthfulness in communications via its official social channels and promotes initiatives aimed at spreading ethical, effective use of the Web for responsible, respectful and inclusive surfing by users.

2 Internal communication

At Fastweb, communication is a two-way dialogue. We invest in the continuous evolution of the channels and methods of communication with our people, creating more and more opportunities for involvement and meeting, including through new technologies.

The "**Agorà**" company intranet is a direct, authentic two-way communication channel that makes it possible to spread knowledge of the main company projects, while also allowing all colleagues to express their opinions,

respond to surveys and participate in all the initiatives designed for us.

Agorà, accessible on both computer and smartphone, including non-company devices, via "AgorApp", supports collaboration, contributes to the spread of our Vision and Values and adoption of behaviours in compliance with the code of ethics, confirming its role as a powerful tool for always staying in touch with people's real needs.

3 Fastweb people's communication via social media

At Fastweb, we believe that it is important to spread a culture of Internet use on a personal and professional level. With this in mind, we organise periodic meetings to **raise awareness** and teach skills on **personal branding** and **social reputation** and we have set guidelines on the proper spread of company information through **social media** that are useful for consolidating Fastweb's reputation.

Employees and contractors are in fact the recipients of this communication, but they are also the best allies to strengthen **brand identity** and support the spread of a more intimate, genuine narration of the company, which starts from the inside.

When employees also take an active role in social communication, they should read and observe the general principles contained in the **guidelines** for the correct, effective use of social networks:

What it means for me

1) Knowing how to interpret the role of social media

Social media is like any other social context: a meeting, a party or a chat at a café. Act like you are in one of these situations. Introduce yourself before you speak, do not pretend to be someone else, do not intrude or interrupt other people's conversations, and so on. In short, make sure that your actions and behaviour on social media are in line with the image you want to give of yourself in the workplace and with customers and in your personal life.

2) Remember that the Internet does not forget

Everything you publish stays online. Keep that in mind before you post something you might regret.

3) Know the Company Vision and Values

They will help you in your dealings with colleagues, customers, suppliers and other stakeholders, including in your social media interactions.

4) Do not be a spokesperson

We encourage participation in Fastweb accounts,

blogs, groups and websites. However, we ask you to state clearly that this is not an official Fastweb communication channel. The only people at Fastweb who are allowed to speak on behalf of the company on social networks are colleagues who are in charge of social media and colleagues involved by the former in specific activities.

5) Abide by Fastweb's guidelines

Fastweb brand consistency is important. If you insert the logo in your blog or other online spaces, make sure you respect the Brand Identity. Always use the latest version. Do not otherwise alter the logo or use it in combination with a product name.

If there are colleagues in the images you plan to post, make sure they agree.

Be careful with photos and videos of technical rooms: customers' equipment must not be shown.

Do not denigrate the competition.

6) Who to contact in case of need?

If you have noticed an "off-the-record" conversation online regarding Fastweb or a customer who has a problem to solve (especially if he or she is saying it in a controversial way), report it to your colleagues in the **Social Media** area.

Read more at:

Social Media Guidelines

In case of doubt contact:

- Social Media
- Corporate Culture & Inclusion

Disciplinary system

The Code, considered as a whole and together with all the specific implementation procedures approved by Fastweb, is to be considered an integral part of existing and future employment contracts pursuant to art. 2104 of the Civil Code.

Violations of these provisions will therefore be considered a disciplinary offence and, as such, will be prosecuted and punished pursuant to Article 7 of Law 300/1970 and the applicable National Collective Labour Agreement in force. Fastweb's Supervisory Body will be notified by Human Capital of the beginning of any disciplinary procedures and of any decisions to dismiss and penalties relating to possible violations of this Code.

Penalties are levied against management level personnel with the involvement of the Chief Executive Officer by Human Capital. The Chief Executive Officer may refer to an opinion by the Management Board in making his or her decision, in accordance with their respective delegated powers and responsibilities.

Should one or more members of the Board of Directors

and/or of the Board of Statutory Auditors violate the rules of the Code, the violation will be assessed according to its severity and may lead - in the most serious cases - to their dismissal for just cause in accordance with the law. Through specific contractual clauses, each Fastweb supplier undertakes to comply with and apply their own internal documents and not to act in conflict with the guidelines set out in this Code.

Violations by suppliers and partners of these commitments, entail, for the corporate functions that have relations with them, the obligation to activate all contractual and legal mechanisms available to protect the rights of the Company, including, where appropriate, termination of the contract and compensation for damages.

How to report violations

Each of us is required to promptly report violations of the Code of Ethics, non-compliance with company policies and, in general, any unlawful conduct of which we become aware, by virtue and on the occasion of our working relationship or functions performed.

You may write an e-mail addressed to the mailbox **ethics@fastweb.it**, which will examine the case and conduct a discrete, in-depth investigation, possibly involving other relevant functions.

In particular, reports relating to discrimination, human rights violations, employment law issues, health and safety issues and issues related to the work environment will be handled by the Social Performance Team, which, in compliance with the new SA8000 certification, guarantees the application of social responsibility principles.

Alternatively, if you feel it is appropriate to report anonymously, you may use whistleblowing channels. The Whistleblowing Policy is distributed and published on the Agorà corporate intranet and requires that all reports be handled according to a predefined process that guarantees objectivity, independence and maximum confidentiality.

Reporting channels

- **Web** with the link <https://www.bkms-system.ch/swisscom-it> accessible from the public Internet accessibile da rete Internet pubblica
- **Mail:** Fastweb SpA - Internal Audit & Supervisory Body
231 Piazza Adriano Olivetti, 1
20139 Milan (ITALY)
- **E-mail** to Chief Audit Executive

Fastweb is committed to guaranteeing all forms of protection under the laws for whistleblowers..

Knowingly or with gross negligence submitting a **report that turns out to be unfounded**, such as reporting false facts in order to discredit a colleague, constitutes conduct that is contrary to our values and company procedures and is subject to disciplinary penalties..

Read more at:

Whistleblowing Policy

In case of doubt, contact:

- Chief Audit Executive
- Compliance

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