



ALMAVIVA GROUP
ANTI-CORRUPTION
POLICY

04.08.2024
Version 1.0

ALMAVIVA GROUP ANTI-CORRUPTION POLICY

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1. INTRODUCTION

Almaviva Group accompanies the growth of the country's system, supporting enterprises in the new challenges they must face in order to remain competitive in the digital age and innovating its own business model, organization, corporate culture, and information and communications technology.

As a technology company, we are committed to contributing to sustainable development by harnessing the power of technology for the common good and guiding the transformation responsibly, adhering to the principles of fairness, integrity, transparency, and traceability.

2. OUR COMMITMENT

We are aware that corruption represents an obstacle to economic, political, and social development and a threat to the integrity of the market within which we operate as a Group. For this reason, we are committed to conducting our business with loyalty, honesty, integrity, and transparency, in compliance with the applicable laws, regulations, mandatory standards, international norms, and guidelines of the countries in which we operate, including laws that ratify international conventions, which prevent and prohibit any attempt at corruption against public officials, as well as corruption between private parties, such as: (i) the OECD (Organization for Economic Cooperation and Development) Anti-Bribery Convention, combatting the corruption of foreign public officials in international economic operations; (ii) the United Nations Convention against Corruption; (iii) the Foreign Corrupt Practices Act enacted in the United States; (iv) the UK Bribery Act enacted in the United Kingdom; and their subsequent amendments and additions.

Almaviva Group's Anti-Corruption Policy is based on the principles and values of the Group's Code of Ethics and Conduct and on the Model of Organization, Management, and Control pursuant to Legislative Decree n. 231/2001 ("Organizational Model 231") approved by the boards of directors of Almaviva Group's companies.

The Policy aims to establish clear guidelines regarding the prohibition of corrupt practices for members of the corporate bodies of the Group's companies, their management, and all of their employees, as well as for all those who, permanently or temporarily, establish relationships with Almaviva Group ("Recipients").

Compliance with the rules and principles outlined in this document is an essential and mandatory part of the obligations associated with the employment relationship. Consequently, failure to comply with these provisions may result in disciplinary action and, in more severe cases, termination of the employment relationship. For other Recipients, the violation may result in the application of penalties or termination of the contractual relationship.

3. OUR PRINCIPLES

3.1. Donations, Gifts, Sponsorships, Representation Expenses, and Facilitation Payments

The handling of gifts, sponsorships, donations, and representation expenses is one of the primary avenues through which the crimes of corruption, undue solicitation to provide or receive benefits, and corruption between private parties or within public administration can occur.

For this reason, promising or offering money, benefits, or favors and/or requesting or accepting money, gifts, or other benefits, aside from occasional gifts of nominal value given as a standard courtesy, is prohibited. Political donations are prohibited in all forms, whether tangible or intangible.

Representation expenses incurred by employees must be recorded and properly documented in detailed expense reports, approved by the head of the department and reimbursed only after their validity has been verified.

Furthermore, the Group expressly prohibits, both in Italy and abroad, any and all type of facilitation payments, meaning any form of payment or provision of other benefits made, directly or indirectly, to public officials, public service officers, or private parties, whether they be individuals or economic entities, Italian or foreign, with the aim of expediting, facilitating, or simply ensuring the execution of an activity within the scope of the duties of the public or private entities with which the Group's companies operate.

3.2. Human Resource Management

The selection and hiring of Al maviva Group personnel is carried out in compliance with the principles of fairness, transparency, impartiality, publicity, and professionalism. For this reason, the Group condemns any action or form of favoritism that may be construed as corrupt.

Hiring workers under contractual terms other than those provided for by the relevant national collective labor agreement and entering into agreements with temporary employment agencies, which place workers in exploitative conditions, in order to save on costs is prohibited.

All selection and hiring of personnel must take place through the officially established channels, according to the procedures adopted by the Group and in compliance with the principles and criteria outlined above.

The Group's HR departments are committed to hiring workers whose profiles meet the company's needs, based on the criteria of professionalism and competence.

3.3. Conflict of Interest

A "conflict of interest" is when an individual's personal interests or activities interfere, or appear to interfere, with the interests of the Group. For example, conflict of interest may arise when an employee's actions or interests interfere with his or her ability to impartially and effectively carry out his or her duties or make decision that are in the best interests of the Group's companies.

If you believe you are facing a real or potential conflict of interest, you are obligated to report all the details of the case to the Group through the channels provided on the company's Intranet and on the Group's institutional website.

3.4. Relationships with Public Administration

All Group relationships involving public officials, public service officers, and, more generally, the public administration of any of the countries in which the Group operates, must be conducted in full compliance with Al maviva Group's Code of Ethics and Conduct, Organizational Model 231, and, more broadly, in accordance with the principles of fairness, loyalty, transparency, and traceability. These relationships must be managed solely by designated and authorized individuals, in compliance with the roles and responsibilities assigned to them.

Granting of favors, collusive behavior, direct solicitations, and/or solicitations through third parties with the intention of obtaining advantages for the Group, for oneself, or for others is prohibited. Offering, approving, or promising to make payments of any amount, directly or indirectly, to a public official in order to ensure, maintain, or obtain work, pursue business advantages, or for any other purpose, is also prohibited.

Activities associated with relationships with public administration include: participation in public tenders; awarding and signing of contracts and management of related duties; handling of obligations and submission of declarations and/or other required documentation; obtaining

permits, authorizations, licenses, etc.; inspections and audits conducted by public authorities; and management of public contributions and funding.

3.5. Relationships with Suppliers, Consultants, and Contractors

The selection of suppliers, consultants, and contractors for the supply or provision of goods or services to the Al maviva Group and the management of the relationships with them could present situations potentially at risk of corruption. For this reason, these decisions are based on assessments that take into account factors such as professionalism, transparency, reliability, quality, integrity, and cost of the service.

All of the Group's relationships with suppliers, consultants, and contractors must fully adhere to Al maviva Group's Supplier Code of Conduct.

The persons in charge of goods and services are required to conduct their business activities in compliance with the rules of fair and honest competition, in accordance with the relevant legislation, and commit to respecting all applicable laws. For this reason, all forms of corruption, such as bribery, extortion, or misappropriation, are strictly prohibited.

3.6. Reporting of Violations (Whistleblowing) and Sanctions

Al maviva Group has implemented an effective system for receiving and managing "Whistleblowing" reports which is able to guarantee the confidentiality of the whistleblower and the content of the report.

Any action and/or behavior, even if only indirectly or potentially corrupt, carried out by an employee of the Group, will be addressed via the application of measures and disciplinary actions commensurate with the severity of the violation. Violation of the policy by third parties may result in a failure to establish a contractual relationship or in the termination of an existing contractual relationship.

The Group offers anti-corruption training to ensure that all employees understand and are aware of the risks of corruption to which they themselves and the organization to which they belong may be potentially exposed.

3.7. Bookkeeping

Every operation or transaction of the Group must be authorized, verifiable, legitimate, consistent, appropriate, and properly recorded in the company's accounting system in accordance with the criteria indicated by applicable accounting principles and current regulations of both the Italian legal system and the legal system in which the headquarters of the Group's companies are located.

4. ADDITIONAL INFORMATION

In implementing this Policy, Al maviva Group pledges to continuously update and revise the document, taking into account relevant changes in regulations and legal precedents, as well as recommendations from the Supervisory Body and the Group's "Internal Audit and Compliance 231" department.

Al maviva Group's Anti-Corruption Policy is supplemented by other company policies, specifically:

- Group Policy
- Code of Ethics
- Supplier Code of Conduct
- Organizational Model "231"
- Whistleblowing Procedure

Details regarding Al maviva Group's commitment to anti-corruption are available on Al maviva website in the *Corporate Governance* section and in the published *Sustainability Reports*.