




CODE OF ETHICS

FASTWEB +  **vodafone**

Approved by BoD on 25/07/2025

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Index

Message from Walter	3
How to apply the Code of Ethics	4
Ethical Questions	4
Information and Training	5
Our values	5
Our commitment to integrity and transparency	6
Principles of Integrity and Transparency	6
Conflicts of Interest	6
Ethics in business relations	8
Prevention of money-laundering and tax crimes	8
Fight against corruption	9
Gifts, presents and hospitality	10
Relations with the Public Administration	10
Fair competition and consumer protection	11
Accounting Transparency	13
Internal Control	13
Artificial Intelligence	14
Economic Sanctions and Trade Controls	15
Our commitment to the safety and protection of corporate assets	16
Security	16
Protection of Company Assets	16
Information and document management	16
Our brands	17
Intellectual Property Rights	17
Our commitment to people	18
Selection and work environment	18
Diversity and Inclusion	18
Health and Safety	19
Wellbeing&Welfare	20
Our commitment to respect the environment	21
Our commitment to customer data	22
Our commitment to responsible communication	25
External communication	25
Internal communication	25
Communication via social media	25
Disciplinary system	27

Message from Walter

Fastweb shares a culture based on inclusion and transparency, at the center of which are people, their experience and competence.

Fastweb is committed to pursuing its goals with transparency and integrity and to acting in an ethically responsible manner, adopting policies based on zero-tolerance for illegal activity even in relations with all its stakeholders.

Our strategic vision aims to contribute to the digital transformation of the country thanks to investments in infrastructure and continuous technological innovation. Our commitment, in line with the Swisscom group's ESG strategy, is to achieve the ambitious goal of becoming Net Zero Carbon by 2035.

I am convinced that these challenges can only be overcome through a strong team spirit and an individual and collective commitment to respect the principles of loyalty, integrity, ethics and sustainability.

I therefore invite you to read our Code of Ethics carefully, to identify the most appropriate behaviors that comply with the law and our values, to apply them consciously with responsibility and professionalism.

Walter Renna
Chief Executive Officer

How to apply the Code of Ethics

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

Everyone takes responsibility for their actions, considering people, and the social context.

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

It's 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 behavior or situation, but it does establish criteria of conduct to be observed and applied according to diligence and the rule of common sense.

In **relations with third parties**, whether commercial, institutional, social or of any nature, it is necessary to:

- *promote knowledge of the guidelines contained in this Code of Ethics*
- *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. To understand what behavior is correct and 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 that this is legal and in compliance with our internal policies?
- ***Can it damage our company's reputation?*** Could spreading this information have adverse impacts on the company's image?
- ***Is it in the interest of Fastweb?*** Can my decision create a conflict between my personal interest and that of the company?
- ***Can Fastweb + Vodafone customers be harmed by this behavior?*** Has everything necessary been done to reduce risks to the detriment of the Company or to the end customers?

If answering the Ethical Questions, we find confirmation of a risk of non-compliance with the values and principles that inspire Fastweb's actions, it is necessary to refrain from taking action and consult the paragraphs of the Code or the reference policies.

But if you still have doubts about the behavior to follow, ask your line manager, your HR Business Partner, or the Integrated Compliance & DPO team.

Information and Training

Fastweb recognizes the importance of continuous training as a fundamental tool to ensure professional growth, ethical awareness and regulatory compliance for all employees.

All employees are required to actively participate in training and training programs, in order to maintain high standards of competence, integrity and responsibility in their activities.

To ensure full knowledge and application of the Code of Ethics, Fastweb commits to:

- *Making it available through **publication** on internal (intranet) and external (corporate website) channels;*
- *Organizing **periodic training** sessions to deepen the principles and rules contained in the Code;*
- *Promoting internal **communication campaigns** to raise awareness and constantly update recipients on ethical and compliance issues;*
- *Providing **support and advice channels** for clarifications and reports of any doubts or violations;*

Our values

Our success and ability to face market challenges are the result of sharing the Common Values that inspire our employees every day.

Our Values are the expression of a company that is constantly evolving and continuing its leading role in **the digitalization of the country**.

The goal of conducting an ethical business can only be achieved if all people work as a team, inspired in their behavior by common and shared values.

Our Values are a common heritage to which we all contribute in our daily work and for which we are all responsible to the same extent, they inspire behaviors that have an immediate reflection inside and outside **Fastweb**.

SPARK PASSION

We inspire people to thrive and embrace change.

AIM HIGH

We set ambitious goals and deliver together.

STAND TRUE

We lead by example, keep promises and speak up.

Sustainability goals

Fastweb aims to have a positive impact for people and communities, supporting the availability and use of high-performance networks and promoting technological empowerment and digital literacy; promoting the dissemination of digital skills and the affirmation of an inclusive culture also by supporting the growth of talent; promoting solutions that generate a positive impact in the sector of the development of telecommunications and telephone systems, minimizing the environmental impacts of the related physical structures and contribute to the fight against climate change.

Since January 1st, 2022, Fastweb has become a Benefit Company. As a Benefit Company, the company pursues goals of common benefit and of a more connected, sustainable and inclusive future.

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

Principles of Integrity and Transparency

In carrying out their duties, the people at **Fastweb** inspire their conduct by the **principles of integrity, honesty** and transparency.

Directors and employees are required to diligently comply with current laws, the Code of Ethics and internal policies, always adopting a high standard of business ethics. Under no circumstances can the Company's pursuit of a legitimate interest justify illegal or dishonest conduct. We adopt organizational tools to ensure compliance with legal provisions and promote maximum transparency in the conduct of agreements and communications with customers, suppliers, business partners, and public bodies.

What it means for me

- Always be truthful and refrain from making statements that are dishonest, incorrect, or aimed at misleading or providing distorted information.
- Don't make false, misleading, or disparaging statements about a competitor, their products or services. Rather, focus on the advantages deriving from our products and services, in an accurate and not misleading way.
- Share requests for information or documents from Public Administrations or public bodies with your line manager and the relevance functions to ensure that you meet all legal requirements and that the Company's rights are guaranteed.

Conflicts of Interest

It is important to report conflicts of interest and external assignments to protect the interests of our company

In every role, we make decisions that must exclusively pursue the interests of Fastweb and must not be influenced by personal interests.

To ensure objectivity, transparency and fairness in the context of business decision-making processes, each of us is required to promptly report any situation that may generate a potential conflict, that is, a situation that could generate a conflict in the future, between our personal and business interests.

Questions

When do we have a conflict of interest?

- If we pursue an interest other than business objectives
- If we benefit 'personally' from a Fastweb business opportunity
- If we handle activities that may influence the independence and objectivity of making decisions in the best interest of Fastweb.

Situations to absolutely avoid:

- Promote sponsorships or donations in favor of associations or initiatives in which we (or people dear to us or related to) are involved.
- Hire or manage your own relative or partner.
- Hiring a person so that the Company can benefit from its relations with the world of politics or public administrations or business partners.
- Maintain a relationship with a supplier, customer, or competitor out of personal interest.

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

- Carrying out external activities compromising the possibility of dedicating time and attention to the role and tasks performed at Fastweb
- Kinship relationships or personal ties with employees of client companies, both public and private, or business partners and suppliers who have decision-making powers in relations with Fastweb.
- Existence of economic and financial interests of employees or close relatives in the business activities conducted by Fastweb or in the activities of customers, suppliers, competitors (including parent and subsidiary companies).
- Ownership of administrative or controlling corporate roles, other positions or positions of any nature in other companies with which Fastweb may have commercial or business relationships.
- Holding political office.
- Assumption of roles or positions in associations or public bodies with which Fastweb could have commercial relations or business relationships.
- Carrying out work activities at client companies, suppliers, partners.

How to behave in these cases?

It is necessary to refrain from conflicting conduct or activity that could influence your decision-making independence, promptly report the situation to the direct manager, to Human Resources and to the Supervisory Body so that any incompatibility or adverse situations may be assessed.

It is possible to request an evaluation in advance by the competent functions to identify and manage any conflicts of interest.

Remember: Failure to communicate a conflict of interest situation may result in disciplinary action (see *par. Disciplinary system*)

Finally, all employees are required to report, at all time, to their direct manager, to Human Resources, as well as to the Supervisory Body, any situation of conflict of interest, even potential, that may arise between them, their relatives, relatives-in-law, their spouse/partner and personnel of Public Administrations, or of any entity that holds public tender.

To learn more, see: The Conflicts of Interest procedure, Anti-Corruption Guidelines.

If you have any questions, please contact: HR Business Partner, Integrated Compliance & DPO.

Ethics in business relations

We ask our partners to share our principles of integrity

We work inspired by **principles of integrity** and **intellectual honesty**, and we are committed to ensuring that our suppliers and business partners work together according to the same principles.

In agreements with suppliers, consultants and other partners, we seek a legitimate competitive advantage for the Company, the granting of equal opportunities and the establishment of a relationship based on fairness, honesty, efficiency and professionalism.

Fastweb does not exclude certain types of customers, suppliers or partners but pays the utmost attention to ensuring that the entire value chain remains in accordance with ethical principles, does not maintain direct or indirect relationships with people who belong to criminal organizations or who operate outside the law, by way of example, but not exhaustively: people linked to money laundering, drug trafficking, and usury.

Fastweb expects its suppliers and sub contractors to assume their responsibility towards society, the environment and good governance, in accordance with company values and with its environmental and social policy. For this reason, we have introduced a **Code of Conduct for Purchasing** in line with our principles, which represents a binding reference point for our partners and for the people at Fastweb who deal with procurement and constitutes an unavoidable basis for relationships with our supply chain.

We ask our suppliers to commit to the protection of human rights, to comply with labor legislation, and with the legal provisions on health and safety, environmental protection and data protection.

To strengthen our commitment to the prevention of crimes pursuant to Legislative Decree no. 231/2001, our contracts provide clauses for the dissemination and knowledge of our **Code of Ethics** and **Model 231** and a declaration of commitment by the other party not to adopt behavior in violation of them.

What it means for me

- Verify already during the negotiation phase the willingness of the other party to align with our Code of Ethics and to guarantee behavior that does not conflict with the principles indicated in this Code.
- Start the qualification process in good time, complying with the relevant policy.
- Ensure that suppliers, consultants and partners in the execution of services are committed to full compliance with Legislative Decree 231/2001 by accepting our 231 standard clauses and all applicable national and international legislation on the environment, health and safety, human rights and workers' rights.

To learn more, see: Supplier Qualification Procedure, Code of Conduct for Ethical and Sustainable Purchasing.

If you have any questions, please contact: Supply Chain Management, Integrated Compliance & DPO.

Prevention of money-laundering and tax crimes

Fastweb is committed to applying controls for administrative accounting obligations and to applying organizational measures to promote **transparency and traceability** in the management of financial flows.

Before enter into partnerships or contracts with unusual customers/suppliers, it is necessary to ensure the reliability and correctness of the activities carried out by the other party to prevent our services from being used for illegal purposes. If you suspect that customers, even potential customers, may be using our services for illegal activities or dubious transactions, it is advisable to consult the Fraud Management team, the Internal Audit team, or, if you have well-founded suspicions, you can make an anonymous report using the Whistleblowing channel (see par. *How to report violations*).

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 the duty to dis-

seminate and transfer the principles of **legality, integrity and fairness** through our own conduct, respecting the system of policies defined to prevent corruption.

Fastweb accept and adopts the notion of corruption that is provided by **Transparency International**, of which it is a member: corruption is “*the abuse by a subject of power entrusted to him in order to obtain private advantages.*”

To reaffirm its effective commitment to the fight against corruption, Fastweb has proactively and voluntarily adopted the **Anti-Corruption Guidelines**, which constitute a tool for summarising and optimizing internal policies, through which the system for the prevention and control of corruption phenomena is strengthened.

Remember: it is strictly forbidden to offer or receive bribes, even through third parties.

Bribe means “the offer or receipt of any kind of gift, loan, fee, compensation or other advantage to induce someone to commit something dishonest, illegal in the conduct of business affairs”

To ensure the effectiveness of this system, **Fastweb adopts the principle of separation of responsibilities** (SOD - Segregation Of Duties); according to which the tasks, operating activities and control functions must be adequately separated, so that the person responsible for the operational activity is distinct from the person who controls and authorizes it.

What it means for me

- Make sure that all payments to and from third parties are consistent, supported by documentation, and properly recorded.
- Consult and strictly observe the policies for operations that involve relations with the Public Administration, respecting the roles of the company structures in charge.
- Declare any relationships of kinship and/or affinity with the managers and employees of the public administration and/or contracting authority.
- Immediately report to the relevant Supervisory Body (organo.vigilanza@fastweb.it), and to the Anti-Corruption Manager (Anticorruzione@fastweb.it) any direct or indirect request aimed at obtaining payments or other utilities in exchange for advantages.

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 quickly through the intermediation of a consultant and offers to put me in touch with the consultant who could accelerate my practice, can I accept?

It is a risky situation, it is forbidden to pay compensation to facilitate or obtain advantages from public bodies

To learn more, see: Anti-corruption guidelines, Anti-Corruption Directive, Sponsorship procedure, Donation Procedure.

If you have any questions, please contact: Anti-Corruption Officer, Integrated Compliance & DPO.

Gifts, presents and hospitality

Our policies do not allow you to receive or distribute gifts, presents and hospitality that could be interpreted as exceeding normal commercial or courtesy practices, or aimed at acquiring or granting favorable treatment in the conduct of activities that can be connected to Fastweb. It is allowed to offer gifts of modest value to promote the company's image or to promote charitable or cultural initiatives.

Receiving gifts from a supplier is not prohibited, but you must communicate them to your manager to allow them to carry out the appropriate evaluations, based on the provisions of the policies.

General rules of conduct

- It is forbidden to **offer gifts, presents or any utility to** Public Administration personnel or their family members.
- It is allowed to grant gifts to a private person with a market value equal to a maximum of **100€** and a total maximum of three times a year.
- Cash gifts are prohibited.
- It is allowed to accept only small gifts (within **100€**) **in compliance with the provisions** of the Anti-Corruption Directive

To learn more, see: Anti-Corruption Guidelines, Anti-Corruption Directive.

If you have any questions, please contact: HR Business Partner, Anti-Corruption Officer, Integrated Compliance & DPO.

Relations with the Public Administration

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

Remember during business negotiations, inspections, audits or other dealings with the Public Administration **IT IS PROHIBITED TO:**

- Privilege or propose recruitment opportunities to the Public Administration personnel involved.
- Offer, accept or encourage gifts, presents or other benefits to Public Administration personnel or their family's members.
- Solicit or obtain confidential information in violation of equal treatment and procedures of public records.
- Accept requests for contributions/sponsorships/donations that may influence the business negotiations or favor Fastweb
- Give or promise money or other utilities because of a requests and/or undue pressure from public representatives.
- We are committed to strictly complying with all current regulations and procedures relating to public tenders, ensuring transparency, fairness and equal treatment among all participants.

If you have any questions, please contact: Anti-Corruption Officer, Integrated Compliance & DPO.

Fair competition and consumer protection

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

We promote compliance with regulations to protect competition and consumers as funda-

mental values and an integral part of the company culture, through an Antitrust Compliance program in line with the highest standards required by current laws and international best practices.

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

Consequently, you must never ask competitors for confidential information, nor agree to receive or discuss it. Anticompetitive practices can damage our business. Customers, suppliers, or former employees who have passed to the competition should never be encouraged to provide information that must be kept confidential.

Fastweb is organized to promptly provide the National Antitrust Authority (AGCM), the European Antitrust Authority (EU Commission) and any other competent authority (AGCOM, Personal Data Guarantor, ANAC) with all the information that may be requested, and to collaborate with them in the context of any instructional or pre-instructional procedures.

Rules of behavior

For the protection of competition

- It is forbidden to exchange sensitive information (such as prices, costs and sales volumes) with competitors that reveal your business strategy: do not ask and do not receive.
- It is prohibited to agree with the competition to fix the price of products or services, including discounts, reductions and commissions with competitors.
- It is prohibited to agree to divide certain customers, regions and markets between us and competitors and to establish, directly or indirectly, a minimum resale price.
- 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.

What it means for me

The sales representative of a competitor that has a customer portfolio in the same geographical area as me suggests that we agree to offer the services by dividing the business customers

Is this an acceptable agreement?

No, it is an anti-competitive agreement because it reduces competition in a particular geographical area

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

With regard to consumers, we take care not to adopt behaviors that integrate an incorrect commercial practice, such as any action, omission, conduct, declaration or commercial communication addressed to the customer before (e.g. advertising) during (e.g. execution of the contract, fault management, contract changes) and after a commercial transaction (e.g. processing of personal data, contract termination) that is suitable to distort the behavior of the customer.

For example, in our business communications we do not represent information that is not true, or that in any case induces or is suitable to mislead the ordinary customer about a commercial

decision; likewise, we do not omit relevant information that the ordinary customer would need to make an informed, free and informed decision (e.g. whether or not to buy a product/service).

Rules of behavior

For customer protection

- Guarantee customers the full transparency of information relating to sales offers.
- It is prohibited to provide false information or to fail to provide relevant information to the customers regarding the product/service and its main characteristics.
- It is forbidden to induce the customer to make a commercial decision through aggressive conduct (e.g. to declare, contrary to the truth, that the product/service, or any special conditions related to the product/service, will be available only for a very limited period of time, to secure a prompt decision).
- Make sure that these rules are also applied by third parties that represent Fastweb because the company can also be held responsible for misconduct by intermediaries (e.g. call centers and external agencies).

What it means for me

The external agency I use for advertising campaigns for my services/products suggests that I use an attractive claim, which highlights a highly competitive monthly price without, however, highlighting the constraints and the additional economic conditions of the offer

Is this an acceptable proposal?

No, by promoting my services/products in this way I carry out an unfair commercial practice and misleading advertising

Remember that commercial communications must be transparent and report in a clear, complete and non-misleading way all the economic conditions of the service/product advertised.

To learn more, see: Antitrust Compliance Policy and related enforcement procedures, Code of conduct for customer protection.

If you have any questions, please contact: Regulatory Strategy, Mobile & Antitrust, Retail Consumer Policy & Golden Power.

Accounting Transparency

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

We prepare the financial statements and all corporate communications with the utmost correctness and full compliance with the relevant legislation and accounting principles, to provide clear, precise, truthful 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 time, it must be possible to verify the characteristics of the operation and the relative decision-making and authorization process.

What it means for me

- Always check the veracity of the documents that feed 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.

If you have any questions, please contact: Team Accounting.

Internal Controls

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

We have proactively equipped ourselves with an **Internal Control System** to monitor the effectiveness and efficiency of processes and systems with a holistic approach, to verify compliance with laws, to ensure the reliability and integrity of accounting and management information, to protect corporate assets, data and business information.

To ensure the effectiveness of internal controls, we have adopted a three- level system that involves 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 carried out.

All employees are committed 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 allow controls on operations, on authorizing processes and on the implementation of the activities conducted.

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

If you have any questions, please contact: Internal Audit, Integrated Compliance & DPO.

Artificial Intelligence

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

Fastweb recognizes the potential of Artificial Intelligence (AI) and the benefits related to its adoption. For this reason, the Company has integrated AI systems and models into its internal processes and customer relationships.

For us, AI solutions must generate **benefits for people**, promoting inclusive growth and sustainable development because people's interests come first.

We are aware that the adoption of AI requires the utmost commitment to manage the challenges and risks to which this new technology is exposed, specifically from the point of view of security and the protection of fundamental rights.

For this reason, we have implemented a rigorous framework of rules and best practices so that the adoption of AI by employees, consultants, collaborators and suppliers takes place in com-

pliance with current legislation, the rights of workers and users and in accordance with the principles listed below – inspired by the European Regulation n. 2024/1689 (AI Act) and the OECD guidelines –, which constitute the foundation of our AI Culture.

Our principles:

- **Compliance with the law:** we develop, purchase, use and provide AI systems that comply with the regulations and *best practices* on Artificial Intelligence.
- **Trustworthiness and transparency:** we establish and maintain a relationship of trust with the users of our AI systems and models, guaranteeing transparency in our work and offering direct communication channels. Being transparent means providing accurate, clear information in an understandable language, so that AI services are recognizable and it is possible for the user to know any risks associated with the use of these solutions.
- **Data governance:** we are committed to ensuring that the quality of the information, data and sources used in the training and operation of our AI systems and models ensures a lawful, fair and non-discriminatory use of AI, free from errors, biases or hallucinations.
- **Protection of personal data:** we protect **personal data** processed through AI systems and models, in compliance with the principle of privacy by design, adopting the most recent security measures in order to prevent negative impacts on the rights and freedoms of the interested parties.
- **Human intervention and surveillance:** we expect our AI systems and models to be used and provided with respect for personal autonomy, as tools at the service of people.
- **Compliance/risk mitigation by design and by default:** all projects that involve the adoption of an AI system or model are subject from the design phase to a risk assessment, followed by the issuance of appropriate mitigation measures.
- **Accuracy, strenght and security:** we are committed to ensuring that our AI systems are accurate, reliable and resilient throughout their life cycle – even under unforeseen conditions – safe against alterations and equipped with a recovery plan in the event of a malfunction.
- **Diversity, non-discrimination and equity:** we develop and use AI systems and models in full compliance with the principles of equal access, inclusion, gender equality and cultural diversity to limit and inhibit the production of discriminatory effects and prejudices.
- **Accountability:** the use of artificial intelligence resources is subject to principles and mechanisms for empowering users, both internal and external.
- **Respect for copyright:** the development and adoption of AI systems and models take place in compliance with copyright legislation (EU Directive 2019/790).
- **Sustainability:** we use AI responsibly, trying to monitor environmental impacts, in line with our sustainability goals.

What it means for me:

The use of AI systems is allowed, in compliance with the rules and best practices indicated in the AI Code of Conduct, paying the utmost attention to the data and information that you can or cannot share during interaction. If you have an idea for developing or purchasing an AI solution for Fastweb or for customers, remember that every project must be surveyed and submitted to a risk assessment.

To learn more, see: AI Governance Model, Code of Conduct for the adoption and use of AI systems and models.

If you have any questions, please contact: Center of Excellence Artificial Intelligence (CoE AI),

Integrated Compliance & DPO.

Economic Sanctions and Trade Controls

Fastweb is committed to operating in full compliance with applicable regulations on Economic Sanctions (Sanctions) and international trade control (Trade Control).

Economic Sanctions are measures taken by one or more States or by international organizations (such as the ONU or the EU) that restrict or block economic, commercial or financial relations with certain countries, companies or individuals.

Trade controls regulate the export, import and transfer of certain goods, technologies (in physical or electronic form), know-how and services, especially those considered sensitive or for dual use (civil and military), to ensure national security and compliance with international obligations.

Antennas and routers are examples of dual-use assets.

An export license may be required for the cross-border transport of these goods.

What to do:

- Let's make sure that the countries with which we enter into commercial relations are not at risk of sanctions
- Any export or re-export needs specific assessments to ensure compliance with applicable regulations.

If you have any questions, please contact: Integrated Compliance & DPO.

Our commitment to the safety and protection of corporate assets

Security

The security of our assets, people, and customer information is critical. Each of us is responsible for the protection and security of Fastweb and its customers. We expect all employees to behave and work to safeguard our cybersecurity in accordance with company policies.

Our principles:

- We ALWAYS use dual authentication to remotely access business systems where sensitive and classified data is present.
- We DO NOT allow unsupported or insecure software to be present on **Fastweb**'s infrastructure.
- We ALWAYS update security software and configure our systems securely, avoiding high levels of vulnerability.
- We DO NOT click on links contained in emails that come from unknown senders, and we do not open suspicious attachments. When in doubt, we report it immediately.
- When a person changes roles or leaves the company, we ALWAYS remove their access in a timely manner. We ALWAYS consider authorizing and providing privileged access.
- We DO NOT share the same passwords with anyone and do not use the same passwords in different contexts. We ALWAYS create a secure password.

Protection of Company Assets

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

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.

Information and document management

We promote a responsible management of business information and documents.

All documents, data, presentations, spreadsheets and emails represent business information that must be correctly classified following the indications given in company policies and procedures.

The sharing of information must be careful, especially if it is transmitted outside the company, and must take place using authorized tools (e.g. Onedrive, Teams); you cannot use unofficial apps for personal use (e.g. Dropbox, Signal) as defined by business procedures.

If there are no commercial reasons or legal requirements for keeping documents, they must be destroyed in a safe and environmentally friendly manner. Keeping information longer than necessary can in fact increase our need for storage facilities and the risk of even unintentional loss of information.

If you have any questions, please contact: Business Security Manager, Integrated Compliance & DPO.

Our brands

Brand protection is critical to the success and reputation of companies.

Our brands represent not only a distinctive sign, but a reputational heritage built over time through reliability, innovation and transparency.

Brand protection is a duty shared by all the people who work within the organization, at every level, and it also extends to suppliers and all those who act in the name and on behalf of the Companies.

Only through collective action can we ensure that our brands remain strong and respected in the market.

What to do:

- We always act ethically and professionally, reflecting the values of the Company.
- Let's make sure that the logo, institutional colors, commercial namings and visual elements of the brand are used in accordance with company guidelines, avoiding distortions, alterations or misuses.
- We maintain a high level of attention in internal and external communications to ensure that they are aligned with the brand identity.
- Let us refrain from associating the corporate brand with personal, political, offensive or otherwise inconsistent with the principles of neutrality, respect and integrity that guide the Company's actions.
- We actively collaborate in monitoring and protecting the brand's digital presence, with attention to social media, forums and unofficial communities, promptly reporting, through the company channels set up brandprotection@fastweb.it, any unauthorized, fraudulent or harmful use of the brand by third parties, online and offline.

Intellectual Property Rights

Our Intellectual Property Rights are valuable assets that differentiate us from the competition. If we fail to protect and register these rights, we risk losing the asset.

We obtain patents to protect our ideas, including technological advances and new products and services. Each of us is responsible for managing our Intellectual Property Rights and protecting them from unauthorized use.

It is equally important to respect the intellectual property rights of others.

It is an additional responsibility to implement appropriate legal bases with our partners and suppliers in order to support our business objectives and effectively manage risks and benefits.

What to do:

- Let's make sure that our ideas for innovative technical products are examined for potential patent protection.
- We immediately forward all questions related to Intellectual Property Rights to the Corporate Affairs team
- We do not use open-source software without verifying the license conditions

If you have any questions, please contact: Corporate Affairs, Legal.

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 all people who work for and on behalf of Fastweb feel valued and treated with fairness and respect*
- *to guarantee working conditions consistent with the company values expressed by the Code of Ethics*
- *to protect **equal opportunities** for growth and professional advancement*

The **protection of human rights** and **workers' rights** generally is a guiding principle for us: we only work with parties who protect and respect these rights, ensuring that they are guaranteed throughout our supply chain. We favor constructive dialogue with labour unions, with business and trade associations.

We guarantee all employees compensation in line with the provisions of national legislation and collective contracts, ensuring that the definition of wage remuneration is based on objective criteria. We guarantee employees an adequate rest period in compliance with the regulations in force on working hours.

We respect the right of workers to have adequate representation, the freedom to establish and/or join workers' organizations 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, and any form of abuse, threat or intimidation in the workplace, even in compliance with the Framework Agreement on Harassment and Violence in the Workplace signed between Asstel and trade unions. We pursue the **principle of inclusion** of all people through our policies.

Selection and work environment

We comply with labor and employment laws and promote equal employment opportunities. We are therefore committed to promoting practices that do not involve or support the employment of child, forced or compulsory labor.

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

Diversity and Inclusion

We want to create a safe and inclusive place where people can proudly express their uniqueness.

We believe that diversity is the engine of evolution: it is from the encounter of our differences that new value is born.

This is the culture that we spread and for which we are committed to inclusivity and sustainability initiatives in various areas: from disability to support for caregivers, from gender equality to the enhancement of STEM skills, with particular attention to raising internal and external awareness on the issues of Diversity, Equity & Inclusion.

We do not tolerate any form of discrimination in hiring, compensation, promoting and accessing training, or when terminating employment or retiring. In particular, we do not allow discrimination based on age, gender, disability, gender identity, emotional and sexual orientation, marital status, family responsibilities, cultural background, creed or political opinion and more. We also combat all those behaviors that result in acts of harassment or bullying. In fact, we believe that a truly inclusive approach can only be achieved through the creation of a corporate culture based on knowledge, on openness to coexistence between differences and on the promotion of the richness of diversity. With this in mind, we organize sensitivity training meetings, a method that

helps to develop more 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, you always act with respect for the people and to protect diversity.
- You also contribute to ensuring an **inclusive work environment** by fighting any form of discrimination or harassment.
- If you suspect discriminatory behavior or inconsistent practices, go deeper with the people concerned, also including the HR Business Partners, and if the suspicions are well-founded, report using dedicated channels (see par. How to report violations).

To find out more, see: Our *Diversity Equity & Inclusion* Policies.

If you have any questions, please contact: Culture, Transformation & Engagement, Diversity, Equity & Inclusion (DEI) Lead, HR Business Partners.

Health and Safety

Safety at work is always our first priority

“Safety First” clearly and decisively represents the desire on the part of Fastweb to give a strong tone for its organization, with the effective application of the guiding principles of current legislation on health and safety in the workplace.

We are actively committed to protecting and preserving the fundamental values that inspire the legislation, through preventive actions and specific safeguards, as well as through 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 way, ensuring safe and healthy work environments, as well as working conditions that respect individual dignity.

In fact, Company seeks to operate with respect for the safety of its employees and of third parties in general, preventing or reducing the occurrence of accidents and mitigating any harmful effects, in the full awareness that the safety and mental and physical well-being of workers are indispensable resources in the execution of a work activity and that their maintenance deserves adequate commitment and attention over time.

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

We are committed to spreading the culture of safety and the protection of the health of workers, as an integral part of the efficiency of our activities, through continuous training, because the involvement and awareness of all employees are fundamental objectives to strive for. Each of us is required to comply with the obligations deriving from accident prevention regulation and to refrain from imprudent or negligent behavior that may constitute a reason for the risk or danger of events harmful to the physical and psychological integrity of ourselves or others.

What it means for me

- *Mutual listening*: everyone, regardless of the role played, must contribute to creating an

environment characterized of constructive dialogue between colleagues. In this sense, transposing business procedures in terms of safety means analyzing the various work behaviors and assimilating their content in order to improve them and make them safer.

- *Sensitivity and attention*: we nurture respect for the work of others, we pay absolute attention to how we do our work and how we carry out the various activities; safety in the workplace depends on everyone's commitment
- *Trust*: trusting others may not always be easy, but it is the only way to collaborate and ensure a harmonious work environment, live your working time better and return home happy
- *Respect and collaboration*: compliance with protocols and procedures is a fundamental aspect of ensuring health and safety in the workplace and limiting the occurrence of events harmful to one's own safety and that of others, through mutual collaboration in the interest of business activity 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.

If you have any questions, please contact: Health&Safety.

Wellbeing & Welfare

For several years, the Company has introduced wellness & welfare models, built on listening to people and aimed at offering greater flexibility in the work/life balance, concrete economic support, with special attention to health, prevention, education and the needs of the family.

The initiatives are available to the entire corporate population.

The models are built to provide **answers to real needs**, making a concrete contribution to the **well-being and development of each person**.

If you have any questions, please contact: HR Reward & Recognition.

Our commitment to respect the environment

Sustainability and environmental protection guide our strategies and projects. Digitalization and sustainability are increasingly integrated into our vision: there is no digitalization without sustainability and there is no sustainability without digitalization.

We are fully convinced of the importance that must be attached to respect for the **environment** and we work every day to reduce our impact on the planet and to protect the ecosystem. Our main commitment is the **fight against climate change**, in which we are seriously and constantly committed over time.

We comply with current legislation on the subject and have adopted environmental policies with a management approach based on continuous improvement. We are committed to calculating our CO2 emissions and to developing decarbonization actions, to buying electricity exclusively produced from renewable sources, to developing products and services that help our customers reduce their ecological footprint, to also involving our supply chain in reducing environmental impacts and in the goal of reducing CO2 emissions.

We are careful to **energy consumption**: we develop intervention plans to improve the energy efficiency of our data centers, technological rooms and our network infrastructure; we develop renewable energy plants (independently or with PPA). With a view to a **circular economy**, we regenerate modems, smartphones, and send our waste to disposal. We help our customers to **develop technological solutions**, through IOT solutions and the use of artificial intelligence, that have a positive impact on the environment, for example by reducing city traffic, optimizing logistics, etc. In addition, we are **Plastic Free** companies: we always avoid, whenever possible, the use of single-use plastic in offices, stores, during meetings and corporate events. We involve our employees and our suppliers, to spread a culture based on the principles of protection of the environment and biodiversity and sustainable development.

Is there a strategy to combat climate change? Yes, we have defined a clear and long-term strategy to contribute to the global fight against climate change. You can consult the **Sustainability Reports**, published by the Company, to learn about the projects carried out and the objectives for the future.

Are there external bodies that have validated the choices put in place for the protection of the environment? Fastweb's carbon footprint reduction objectives have been approved by Science Based Target initiatives. New objectives must be submitted and validated by SBTi at the Swisscom Group level.

What it means for me

- *Always consider the environmental impact that your choices may have when setting up business processes and carrying out your work activities: choose the solution that best protects the environment and resources*
- *Actively involve our suppliers in our commitment to the environment, promoting sustainable practices throughout the supply chain and ensuring that choices throughout the supply chain are in line with our environmental protection objectives,*
- *Optimize the energy efficiency of your devices and reduce energy consumption when possible: turn off your devices when you don't use them or configure them to turn off automatically, set them to optimize energy savings, interrupt the charging process when completed*
- *Prefer "gentle" mobility, that is, walking, using scooters or bicycles, using public transport. When this is not possible, use the car-sharing services in your city or share the journey with a colleague*
- *Avoid the use of single-use plastic as much as possible, thus reducing the consumption of raw materials and the production of waste. Do you always separate the waste you produce.*

To find out more, see: Environmental Policy.

If you have any questions, please contact: ESG.

Our commitment to customer data

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

What Data Protection means

We consider the **protection of personal data** as a **fundamental value** for running our business, building a relationship of trust with customers and increasing hope in the digital society. Due to the peculiar nature of the services we provide, both to residential customers and to business or public administration customers, we constantly process personal data.

The Company records personal data when signing a contract, stores and processes them during the contractual relationship for the provision of the service or the sending of communications, canceling or modifying them at the request of the interested parties.

We act with the understanding that they do not own this personal data.

The owner remains the person concerned and the companies only find themselves accidentally and for a limited period of time dealing with them.

During the limited period of time in which we have the availability of the personal data of the interested party, whether they are internal or final **customers, fundamental principles** are followed: to protect their confidentiality, integrity and availability and to minimize their use as much as possible.

Exclusively through an operational strategy aimed at guaranteeing and promoting the protection of personal data and the correct management of personal data in our availability, it is possible to prevent harm, even negligent, to individuals and the penalties provided for by the law imposed by the Supervisory Authorities.

Our principles

• **Transparency**

It is essential that the customer is informed of the treatments that involve his personal data and that the latter never loses control over it.

This is why we are committed to providing clear and simple but detailed information that is a priority.

Furthermore, always by virtue of transparency, customer data is not shared without the customer being adequately informed and aware of the treatments and the subjects called to carry them out. Finally, the data is processed exclusively for the purposes indicated in the information and in the manner listed therein.

For this reason, it is essential that all the treatments performed are promptly included in the company's Register of Treatments and constantly updated.

• **Fairness and Lawfulness**

To combat illegal phenomena related to personal data such as, first of all, fraudulent retrieval, sale or processing in the absence of appropriate consent, we pay attention to the methods of data acquisition.

The Company carefully monitors the members of its sales network in order to ensure that they collect only the data necessary for the provision of their services together with the consents necessary for processing.

• **Privacy By Design & By Default**

Every project that involves the processing of personal data is analyzed, right from the design

stages, to ensure that privacy is an essential requirement developed by **default**: data must be protected at all stages of the activities through appropriate security, technical and organizational measures.

- **Minimization and Need to Know**

Process only the data necessary to achieve the purpose indicated in the information and for only the time necessary, through specific and detailed data storage policies

Accountability is the principle that guides our actions, so it is essential to make the company responsible, starting with each employee, regarding the importance of proper processing of personal data: each of us is responsible for compliance with these principles, both internally and externally, with our partners and suppliers. In addition, at Fastweb, responsibility is decentralized in individual structures and departments through the definition of clear roles and responsibilities such as the *Data Manager, the GDPR Competence Center, the Editor or the Authorized to process particular categories of data*.

What it means for me

- **Follow business procedures for Design**

Privacy is a requirement to consider at the design stage.

We have equipped ourselves with a special process to evaluate projects and define risks for interested parties right from the design/conception.

Every time you follow the development of a project that for some reason involves the processing of personal data has an impact on them, so remember to submit the request through the business evaluation tool

- **Consider Privacy as a constant setting**

Our systems and processes are designed to respect privacy at every stage of the life of personal data: we collect only the necessary data, store it in an appropriate manner and allow interested parties to exercise their rights

- **Apply the principles with respect to your role**

It is important for us to give clear and specific instructions for each activity and process, because only in this way is it possible to minimize risks.

Privacy policies and best practices have been prepared to follow, together with specific awareness courses.

Do not register, process and disclose the personal data of other employees, or of third customers that you become aware of for reasons related to your office, otherwise you may face the administrative and criminal sanctions provided for by Legislative Decree 196/2003 articles 161 et seq. and articles 167 et seq. as well as the disciplinary sanctions provided for by the CCNL and any company regulations

- **Minimize**

Acquire and process only the data necessary and appropriate for the performance of the intended purposes and according to the procedures provided for.

- **Communicate**

Contact the Integrated Compliance & DPO group or the DPO if you detect data processing that does not comply with the methods described in the policies or in this document.

Notify the privacy representatives in each BU to start a new treatment so that it is possible to keep track of it in the appropriate Register of Treatments, which, exclusively thanks to the collaboration of each one, can be properly fed and updated.

I lost my business PC what should I do?

Since the company PC could contain personal data (yours or those of our customers), a data

breach could be configured: any incident or non-standard event that involves a compromise in 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 my mobile phone number to send a newsletter?

By virtue of the principle of minimization, only the data actually necessary for the predetermined purpose must be collected: the mobile number is not necessary to send the newsletter; therefore, its collection does not reflect the principle of minimization.

Before collecting data, always ask yourself: do I use this information? If so, why? Is it essential for the achievement of my purpose?

Can I give my login credentials to a colleague?

Although it may seem like a mere courtesy activity, it is important to remember that credentials are assigned based on the principle of necessity and minimization: each person in charge can only access data pertaining to the assigned functions. So if the colleague does not have the credentials, it is because actually, for his role, he does not need to view personal data.

In the same way, before extracting personal data from systems to share them, even with other employees, always ask yourself if they are all necessary, if the people you are sending them to are entitled to see them, if there is an alternative way to achieve the same purpose without risking compromising personal data. Also, remember to never share personal data in plain text, preferring encryption solutions.

Also, **remember** that the credentials are nominal precisely to track the activities carried out: if you transfer your credentials, every activity and possible misuse are associated with you

If you have any questions, please contact: Integrated Compliance & DPO.

Our commitment to responsible communication

External communication

At Fastweb, all external communication (customers, suppliers, stakeholders, financial community, industry authorities, press) is based on principles of transparency, veracity and accuracy. Requests for information are taken care of and addressed to the relevant departments and competent teams. We pay particular attention to communication to the mass media, which is managed by the Communication & Sustainability Department, which provides timely, verified and punctual information that reflects the values and ethical principles set out in this Code.

To this end, no employee may, without authorization, make statements or provide information about the company (including members of the Ex.Co.), on products and services or provide confidential financial information, but may instead contact the Communication & Sustainability Department, which will direct the request and manage communication.

The Company also adopts the same principles of transparency and veracity in communications transmitted through its official social channels and promotes initiatives aimed at disseminating an ethical and effective use of the network in favor of responsible, respectful and inclusive browsing by users.

Internal communication

Communication in Fastweb is a two-way dialogue. We invest in the continuous evolution of channels and methods of communication with our people, creating more and more opportunities for involvement and encounter, also thanks to the use of new technologies.

Through **intranet** channels, we disseminate the main business projects and at the same time we allow all colleagues to express their opinion, respond to surveys and join all the initiatives designed for us, in this way we activate a direct and authentic channel of two-way communication. The intranet channel, accessible both via computer and smartphone, even if not corporate, supports collaboration, contributes to the dissemination of our Values, to the adoption of behaviors that adhere to the Code of Ethics and is confirmed as a powerful tool for always listening to people's real needs.

Communication via social media

We believe that it is important to spread a culture responsible for the use of the network and social media on a personal and professional level. With this in mind, we periodically organize meetings to **raise awareness** and disseminate skills on **personal branding** and **social reputation** and we have defined guidelines on the correct dissemination of business information through **social media** to remind us that our actions can have an impact on the company's brand reputation. Employees and collaborators can be the best allies to strengthen **brand identity** and support the spread of a more intimate and genuine narrative of the company, starting from the inside.

General principles for social media activities

1. Knowing how to interpret the role of social media

Social media are the equivalent of any social context.

Always use common sense and courtesy. Admit mistakes and, if necessary, apologize. Do not censor the opinions of others, provoke quarrels and discussions, publish inappropriate material. Avoid cracking down on the competition. Don't reply to negative comments about the company: you will avoid unintentionally fueling controversies that can damage the Brand

2. Remember that the network does not forget

Everything you publish stays online. Keep this in mind before posting anything you might regret.

3. Know the Company Values

They will be useful to you in relationships with colleagues, customers, suppliers and other stakeholders, even when interacting on social media.

4. Don't act as a spokesperson

We encourage participation in accounts, blogs, groups and websites dedicated to our brands. You can follow the Fastweb website and the corporate accounts of the companies, share and repost the content you like. However, clearly specify that the ideas and opinions expressed are your own. Always speak in the first person and add value with your posts.

Publishing deserves reflection.

Don't speak on behalf of Fastweb (if you have a blog/ personal space, insert an exemption clause)

5. Respect the Fastweb brand guidelines

If you use logos, use the Outlook signature with the joint logo already available with Exclaimer Cloud.

Brand consistency is important. Do not alter the logo in any other way and do not use it in combination with a product name.

Don't denigrate the competition.

6. Before posting a photo, ask permission from the individual portrayed there.

Pay attention to photos and videos of the technical rooms: customer devices must not appear

7. Who to contact in case of need?

If you have noticed an "unofficial" conversation online concerning Fastweb or a customer who has a problem to solve (especially if they are saying it in a controversial way), report it to colleagues in the Social Media area.

To find out more: Social Media Policy & Guidelines.

If you have any questions, please contact: Brand & Media, Corporate & Internal Communication.

Disciplinary system

The Code, considered as a whole and together with all the specific internal procedures, must be considered an integral part of the existing employment contracts, pursuant to art. 2104 of the Civil Code.

The violation of these provisions will therefore entail a disciplinary offense and, as such, will be prosecuted and sanctioned pursuant to and for the purposes of art. 7 of Law 300/1970 and of the applicable and current CCNL.

The Supervisory Bodies are notified, by Human Resources, of the opening of all disciplinary proceedings and of any archiving and sanctioning measures relating to any violations of this Code.

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

If the violation of the provisions of the Code is carried out by one or more members of the Board of Directors and/or the Board of Statutory Auditors, this violation will be assessed according to its severity and may lead – in the most serious cases – to their dismissal in accordance with the provisions of the law.

Each Fastweb supplier, consultant and partner, through specific contractual clauses, undertakes to respect and apply their internal documents and not to act in violation of the guidelines indicated in this Code.

Violations by suppliers and partners of these commitments entail, for the business functions that have relationships with them, the obligation to use all the contractual and legal instruments available to protect the Company's rights, including, where appropriate, the 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 potentially illegal behavior that we become aware of in a lawful manner, because of and on the occasion of the employment relationship or the functions performed.

You can write an e-mail addressed to the mailbox ethics@fastweb, which will examine the case and with the utmost discretion will investigate, possibly involving other reference functions.

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

Alternatively, Fastweb also allows anonymous reports to be carried out through Whistleblowing channels.

The Whistleblowing Policy is distributed and published on the company intranet and requires that all reports are managed following a predefined process that guarantees objectivity, independence and maximum confidentiality.

The channels through which to report:

- **WEB:** Platform accessible from an intranet and/or public internet with the [Illegal Reports | Fastweb](#)
- **Mail:** Fastweb SpA – Casella Postale n° 106 – Viale Emilia, 66 | 20093 Cologno Monzese (MI)

Fastweb is committed to guaranteeing every form of protection provided by current regulations in favor of whistleblowers.

There will be no retaliation if you make a report in good faith, you are acting in compliance with the Code of Ethics.

Making a report that proves to be unfounded with intent or gross negligence or when the whistleblower's criminal liability is established (even in the face of a first-instance sentence) for crimes of defamation and/or slander, for example reporting false facts to discredit a colleague, constitutes behavior contrary to our values and business procedures, subject to disciplinary sanctions

To find out more, see: Policy Whistleblowing.

If you have any questions, please contact: Head of Audit.

