

Retelit Group

PL.07 - ANTI-CORRUPTION POLICY AND ANTI-MONEY LAUNDERING MEASURES

DOCUMENT CHECK

<i>Status</i>	<i>Description</i>	<i>Reference page/chap.</i>
VER. 00 Date: 07/12/2023	First Issue	All.
VER. 01 Date: 03/09/2025	Integration of ISO 37001 requirements	All.

By	Role	Area
Approved by Board of Directors' resolution of September 3, 2025		

Distributed to:	<i>Retelit Group Companies</i>
-----------------	--------------------------------

Rev	Date	Policy 07 – Anti-corruption policy and anti-money laundering measures	Retelit Group
01	03/09/2025	All rights reserved – TLP Green	Pag. 2/13

CONTENTS

1	INTRODUCTION	4
2	PURPOSE	4
3	SCOPE OF APPLICATION	4
4	REGULATORY REFERENCES	4
4.1	REGULATIONS	4
4.2	INTERNAL REFERENCES	5
5	GENERAL PRINCIPLES	5
6	RULES OF CONDUCT AND SAFEGUARDS	6
6.1	RELATIONS WITH THE PUBLIC SECTOR	6
6.2	ACQUISITIONS OF OTHER COMPANIES AND JOINT VENTURES (M&A)	7
6.3	AWARDING OF CONSULTING, WORKS AND SUPPLY CONTRACTS	8
6.4	PERSONNEL RECRUITMENT, HIRING AND MANAGEMENT	8
6.5	ENTERTAINMENT EXPENSES, GIFTS, BENEFITS AND OTHER UTILITIES	9
6.6	SPONSORSHIPS	10
6.7	RELATIONS WITH POLITICAL AND TRADE UNION ORGANISATIONS	10
6.8	COMMERCIAL ACTIVITY MANAGEMENT	10
6.9	ACCOUNTING RECORDS AND CASH FLOW MANAGEMENT (PAYMENTS-TREASURY)	11
7	TRAINING AND SUPPORT	11
8	REPORTING OF NON-COMPLIANT CONDUCT	12
8.1	NEAR MISSES	13
9	SANCTIONING MEASURES	13

Rev	Date	Policy 07 – Anti-corruption policy and anti-money laundering measures	Retelit Group
01	03/09/2025	All rights reserved – TLP Green	Pag. 3/13

1 INTRODUCTION

The Retelit Group conducts its activities based on the principles of legality, integrity, transparency and accountability, in accordance with the applicable Italian and international legislation, the internal regulations, the Group Code of Ethics and the 231 Model (hereinafter also "Principles of Integrity"). In line with the principle of zero tolerance toward all forms of corruption, the Group prohibits any conduct that may, even indirectly, encourage corrupt practices, and is committed to adopting an effective internal control system to ensure the prevention of offences and all unlawful conduct and to continuously improve its anti-corruption system.

2 PURPOSE

The purpose of this Policy is to provide a model for managing the prevention of corruption by defining the standards and rules of conduct that Personnel must adopt to ensure compliance with the anti-corruption regulations.

The Anti-Corruption Policy has the following purposes:

- to prevent and prohibit corruption, ensuring compliance with the domestic and international anti-corruption regulatory standards;
- to develop awareness of the commitment to preventing and combating corruption;
- to establish its reputation in conducting business by ensuring fairness, integrity, honesty and transparency;
- to promote and develop ethics in business relations;
- to create an integrated, implementable and monitorable system of controls;
- to encourage the use of tools for reporting acts of Corruption, including by third parties in business relations with the Company.

3 SCOPE OF APPLICATION

This document was approved by the Board of Directors (hereinafter "BoD") of the parent company Retelit and subsequently adopted by the Subsidiaries and applies to all members of the supervisory, management and control bodies, employees, agents and all those who in various capacities have business relations with the Retelit Group. It applies to all the Group's business activities and always in compliance with the applicable mandatory regulations.

The policy is made available to all personnel through the Group's intranet, while is disseminated to external stakeholders through publication on the website and/or on other business communication channels (i.e., portals), in order to communicate the anti-corruption principles followed by the Retelit Group.

4 REGULATORY REFERENCES

4.1 Regulations

In drafting this policy, reference is made to the regulations listed below:

- The Italian Criminal Code, with particular reference to Articles 317 and subsequent;
- The Italian Civil Code, with particular reference to Article 2635 (Corruption among private individuals) and Article 2635-*bis* (Incitement to corruption among private individuals).
- Legislative Decree No. 231/01 - Administrative Responsibility of Companies and Entities.

Rev	Date	Policy 07 – Anti-corruption policy and anti-money laundering measures	Retelit Group
01	03/09/2025	All rights reserved – TLP Green	Pag. 4/13

- Law No. 190/2012 - Provisions for the prevention and suppression of corruption and illegality in the public sector.
- Legislative Decree No. 231/07 - Prevention of the Use of the Financial System for the Purpose of Money Laundering and Terrorist Financing as well as Directive 2006/70/EC setting out implementing measures.
- ISO 37001 - Anti-Corruption Management System.
- Foreign Corrupt Practices Act (FCPA).
- UK Bribery Act (UKBA).

4.2 Internal References

- Organisation, management and control model pursuant to Legislative Decree No. 231/01
- the Code of Ethics.
- Retelit Group Company Supplier Code of Conduct.
- Whistleblowing Procedure.

5 GENERAL PRINCIPLES

The Retelit Group, in line with its values and in compliance with domestic and international regulations (e.g. "Foreign Corrupt Practices Act" (FCPA) and the "UK Bribery Act" (UKBA)), the Group's Code of Ethics and the requirements of the international standard ISO 37001 (hereinafter also the "Applicable Anti-Corruption Regulations") does not tolerate any form of corruption, whether carried out directly or indirectly, whether active (i.e. proposed to third parties) or passive (i.e. accepted from third parties).

In managing its activities, the Retelit Group is guided by the following principles:

- a) *segregation of responsibilities*: where applicable, the personnel in charge of authorisation or control should not be the same as those called upon to perform the activities.
- b) *impartiality and absence of conflicts of interest*: Personnel must avoid in the context of the activities carried out on behalf of or in the interest of the Company, and in particular in the management of relations with third parties, finding themselves in situations of conflict, even potentially, between their personal interests and those of the Company. Any personal interest, direct or indirect, or activities that may compromise impartiality, transparency, professionalism and effectiveness in the performance of activities must be avoided and promptly reported;
- c) *traceability of transactions and document retention*: all activities performed and related controls carried out must be tracked and be verifiable also subsequently; documented information must be archived so that it can be easily retrieved;
- d) *reliability of third parties*: it is necessary to observe the procedures adopted by the Group to assess the integrity, reputation and financial reliability of its customers and suppliers, and to examine the underlying risks of entering into a business relationship with a new counterparty. It is obligatory to submit to the counterparty the fact that, in order to establish any collaborative relationship, it is necessary to observe the principles contained in the Retelit Group Code of Ethics.
- e) *signatory powers*: individuals with signatory powers are required to operate within the assigned limits of representation and responsibility.

Rev	Date	Policy 07 – Anti-corruption policy and anti-money laundering measures	Retelit Group
01	03/09/2025	All rights reserved – TLP Green	Pag. 5/13

6 RULES OF CONDUCT AND SAFEGUARDS

The Retelit Group operates within a framework of fair competition with honesty, fairness, integrity and good faith, respecting the legitimate interests of all stakeholders (shareholders, employees, customer collaborators, business partners, financial partners).

In no way may the belief that one is acting in the interest or for the benefit of the Company justify conduct contrary to these principles. Full compliance with laws and regulations, ethical integrity, in addition to fairness and transparency, are a constant and ongoing commitment and duty of all Group personnel.

Any practice of a corrupt nature is prohibited: unlawful favours, collusive conduct, solicitation (whether direct and/or through third parties) of personal and career advantages for themselves or others, in violation of the principles set out in this policy, the Group's Code of Ethics, and in the binding procedures and laws. Specifically, the following are prohibited:

- offering, promising, giving, paying - directly or through nominees - undue benefits, economic advantages of any value or other utilities, including of a non-financial nature, to third parties (in particular towards Public Sector Officials or, more generally, Public Service appointees, or even private counterparties), as an incentive or reward for acting in accordance with or in an ommissive manner or contrary to their office/mandate, regardless of where such acts occur or are offered and where the third party recipients operate;
- requesting, receiving, accepting - directly or through nominees - undue benefits, economic advantages of any value or other utilities, including non-financial utilities, from third parties (in particular towards Public Sector Officials or, more generally, Public Service appointees, or even private counterparties), as an incentive or reward for acting in accordance with or in an ommissive manner or contrary to their office/mandate, regardless of where such acts occur or are offered and where the third party recipients operate;

Before establishing partnerships or contracts with non-regular customers/suppliers, it is necessary to be assured upon the reliability and propriety of the activities conducted by the counterparty.

Appropriate organisational measures must be implemented to promote transparency and traceability in the management of cash flows.

As part of the activities carried out by the Retelit Group, the following processes have been identified as sensitive with respect to the risk of corruption and money laundering:

- Relations with the Public Sector
- Acquisitions of Other Companies and Joint Ventures (M&A)
- Awarding of consulting, works and supply assignments
- Recruitment, hiring and personnel management
- Entertainment expenses, gifts, benefits and other utilities
- Sponsorships
- Relations with political and trade union organisations
- Commercial activity management
- Accounting records and cash flow management (payments-treasury)

6.1 Relations with the Public Sector

Personnel involved in any capacity in the management of relations with the Public Sector are required to comply with the provisions of the applicable mandatory laws, the provisions of the Group's Principles of Integrity, in addition to the following:

Rev	Date	Policy 07 – Anti-corruption policy and anti-money laundering measures	Retelit Group
01	03/09/2025	All rights reserved – TLP Green	Pag. 6/13

- the requirements concerning relations with the public sector must be fulfilled with the utmost diligence and professionalism, and the relative documentation must be produced carefully and in a clear format, stored properly and verified and authorised by the personnel in charge, having the appropriate powers;
- interpersonal relations with Public Sector employees must be characterised by effective cooperation, helpfulness and absolute fairness and transparency, in full compliance with obligations and deadlines, paying special attention to and promptly reporting all situations that may generate - even if only potentially - conflicts of interest.
- it is absolutely prohibited, for any reason whatsoever, to promise or offer tangible or intangible goods and/or any kind of favour to Public Sector employees;
- all personnel are obliged to report any attempts at undue demands by public officials or any intermediaries, either directly to their line manager or to the relevant Supervisory Board, or even anonymously through the "Whistleblowing" portal;
- promptly communicate to one's line manager any critical issue or conflict of interest that arises in the context of the relationship with the Public Sector.

6.2 Acquisitions of Other Companies and Joint Ventures (M&A)

Prior to any merger, acquisition or disposal transaction, due diligence must be conducted on the counterparty so as to verify:

- the identity, reputation, professional conduct and integrity of the partners and directors of the companies involved in the M&A process;
- whether the companies involved in the M&A process have an anti-corruption policy;
- the potential corruption risk areas of the company involved in the M&A process;
- the absence of legal proceedings, sanctions or judgments concerning the violation of the anti-corruption and anti-money laundering regulations against the companies involved in the M&A process, their Directors and Top Management, with particular regard to the identification and assessment of possible "legacy" risks, related to any acts committed in the past.

Upon completion of the M&A transaction, the company being acquired or merged shall progressively comply with the provisions of this Policy.

In the case of Joint Ventures, and prior to the agreements, due diligence of the counterparty must be conducted in order to verify:

- the identity, reputation, professional conduct and integrity of the partners and directors of the companies involved in the Joint Venture agreement;
- the potential corruption risk areas of the company involved in the Joint Venture agreement;
- whether the companies involved in the joint venture agreement have an anti-corruption policy;
- the existence of any proceedings, sanctions or judgments showing violation of anti-corruption regulations against the companies involved in the Joint Venture agreement;
- the risk levels on particular activities by auditing the Joint Venture or Joint Venture operator.

The Retelit Group's Senior Management will take steps, either directly or through its representatives, to ensure the Joint Venture's acceptance of the principles contained in this Policy, at least for all aspects deemed significant, in order to prevent any conduct that may be in violation of the anti-corruption regulations.

Rev	Date	Policy 07 – Anti-corruption policy and anti-money laundering measures	Retelit Group
01	03/09/2025	All rights reserved – TLP Green	Pag. 7/13

The original documentation related to partner selection and approval, the Joint Venture agreement, and adherence to the principles of this Policy must be appropriately validated and archived.

6.3 Awarding of consulting, works and supply assignments

Group personnel are required to comply with the existing procedures governing the selection and engagement of companies supplying goods/services and professionals, always keeping in mind the basic principles of respect, transparency and professionalism of labour relations, assessing that the identified parties possess the requirements of appropriate reliability, qualifications to operate and appropriate skills, due reputation and solvency required for the proper performance of the required activities. Wherever possible, different parties at different times should be chosen, according to the principle of risk differentiation and the periodic change of suppliers. The selection process must also be conducted in accordance with the principles of transparency, consistency, impartiality, the absence of conflicts of interest and cost-effectiveness, and be properly documented and justified, in compliance with the applicable regulations in force in particular in terms of the Health and Safety of the individual. In particular, the following activities are to be undertaken:

- the selection and engagement of consultants on the basis of technical, economic, legal and ethical criteria, verifying that they meet the requirements of professionalism, competence and organisation;
- the checking of anti-money laundering and counter-terrorist financing "international black lists" in order to prevent the contracting of individuals and/or legal entities that have been reported for such matters;
- an objective and documented selection activity involving an objective comparison of a plurality of proposals; where such a comparison is not carried out, it must be for objective, plausible and documented reasons;
- verification of the adequacy of the expected/paid consideration with respect to the service performed and market conditions.

In addition, any entity, supplier of goods and/or services to the Group Companies, in relation to the various commodity classes, is required to sign in acceptance the Supplier Code of Conduct, at the time of accreditation in the Suppliers Portal, in order to be able to establish business relations.

6.4 Recruitment, hiring and personnel management

Employees are recruited based on an objective, considered and careful evaluation of the level of quality offered, the cost, time to market and ability to provide and guarantee high levels of services over time.

The proposal for the appointment or assignment of any potential collaborator must be supported, in addition to justified reasoning, by the prior consideration of the fulfilment of the requirements of good standing, professionalism and suitability to operate in accordance with the ethical rules and procedures established by the Company before concluding any agreement or entering into any contractual relationship, while collecting adequate information and documents to be updated appropriately.

Specifically, in identifying and evaluating the potential contributor, it is necessary to:

1. ascertain in advance that there are no prohibitions or limitations to the assignment;
2. verify the actual suitability of the party through due diligence and/or analysis of the curriculum and of the track record which indicates:
 - activities carried out in the sector and the actual substance and level of operation of such;
 - start date of the party's activities;
 - experience and references;

Rev	Date	Policy 07 – Anti-corruption policy and anti-money laundering measures	Retelit Group
01	03/09/2025	All rights reserved – TLP Green	Pag. 8/13

- meeting of the professionalism, suitability and good standing requirements;
- 3. verify by searching for the collaborator's name on available tools (dedicated computer tools, black lists), while ensuring to document the results of this search;
- 4. in the case of the assignment of decision-making powers, acquire attestation from the collaborator in which he/she declares that he/she is not in a conflict of interest or in situations of incompatibility with respect to the applicable regulations, and an undertaking of compliance with the Group's Principles of Integrity;
- 5. assessment interviews should be conducted by several people, in an objective, transparent and fair manner, and the process should be appropriately tracked by documented information (e.g., interview minutes, results etc.);

Employees should be hired in full compliance with applicable labour regulations (e.g., in terms of social security and welfare contributions, residence permits etc.), while the setting of economic conditions should be consistent with the position held in the company and the responsibilities/tasks assigned to the employee. Prior to the completion of the above assessment process, no act or conduct is permitted that may lead a third party to consider it a manifestation of commitment by the Company with respect to the contractual relationship in question.

6.5 Entertainment expenses, gifts, benefits and other utilities

Gifts and other entertainment expenses are permitted as long as they are within the common practice of business and professional courtesy.

Any gift, entertainment expense or other benefit or utility that recipients offer to or accept from public or private entities, directly or through third parties, must have the following characteristics:

- not consist of a sum of money;
- be in compliance with the provisions of the Anti-Corruption Laws and company procedures;
- be paid for within a budget predetermined by the Company or in any case subject to the authorisation of the persons entitled to do so;
- be properly documented/recorded, reporting such to their supervisor;
- not compromise the reputation of either party to the relationship or create the impression for the recipient that they are intended to acquire, retain or reward undue advantages or to exert unlawful or improper influence on the recipient's activities or decisions;
- be appropriate, reasonable under the circumstances, and otherwise made in good faith, as well as supported by appropriate justification;
- not to be offered or accepted covertly;
- be of modest value, meaning a market value of no more than Euro 150.00; the person in charge has a duty to check for frequent/repeated gifts under this threshold, in order to verify the total amount of such gifts.

For their management, expense reports must always be made with traceable payments, in line with Group policies, checked before confirming reimbursement in order to verify and report any presence of excessive and/or unusual amounts. In addition, it is prohibited to claim the reimbursement of entertainment expenses through the expense report when not properly documented and justified.

Rev	Date	Policy 07 – Anti-corruption policy and anti-money laundering measures	Retelit Group
01	03/09/2025	All rights reserved – TLP Green	Pag. 9/13

6.6 Sponsorships

In order to prevent and avoid the risk that sponsorships may be considered a disguised form of conferring a benefit to a third party in order to obtain an advantage, the following principles/rules of conduct must be observed:

- sponsorships must be paid for within a budget predefined by the Company or, in any case, subject to the authorisation of the parties entitled to do so and in compliance with the process defined by internal procedures;
- sponsorships must be of well-known and reputable entities/exhibitions, following thorough analysis on potential sponsorship contract partners and verification of the initiative's legitimacy under applicable laws;
- the sponsorship contract must be in writing and must contain at least:
 - the counterparty's commitment to use the agreed sum exclusively for the purposes of the initiative;
 - an adequate description upon the nature and purpose of the individual initiative, the consideration, terms and conditions of payment;
 - a clause requiring the counterparty to comply with Anti-Corruption Laws and applicable regulations;
- payments must be made only as stated in the sponsorship contract, following verification of the effective provision of the service;

Documentation of each sponsorship activity carried out must be archived and properly retained in order to ensure traceability of the transaction, including over time.

6.7 Relations with political and trade union organisations

Relationships with various organisations, if any, must comply with that indicated by the relevant mandatory regulations. In dealing with persons from political or trade union organisations, the following points must be observed:

- relations with union or political representatives must be handled exclusively by individuals specifically authorised by the Company;
- it is required to report any attempts by union representatives to make undue demands, either directly or through the Whistleblowing Portal;
- prohibition of paying or offering, directly or indirectly, including in different forms of aid or contributions (e.g., personnel recruitment or career advancement), payments or material benefits to union representatives or persons close to them, in order to illicitly influence their behaviour and secure advantages of any kind for the Company.

6.8 Commercial activity management

Business promotion and development activities must be oriented towards and executed in accordance with good faith in the conduct of business and free competition.

It is prohibited to promise or provide or accept, even through nominees, tangible or intangible goods or advantages of any kind, which have the purpose of positioning for and facilitating new business negotiations or maintaining existing negotiations.

Rev	Date	Policy 07 – Anti-corruption policy and anti-money laundering measures	Retelit Group
01	03/09/2025	All rights reserved – TLP Green	Pag. 10/13

6.9 Accounting records and cash flow management (payments-treasury)

All personnel, especially those in charge of Accounting and Financial Administration, are required to verify that all transactions executed by the Group companies have been authorised in advance and are characterised by the principles of appropriateness, legitimacy and appropriate verifiability (including over time), and are recorded in full compliance with the accounting standards and relevant regulatory requirements.

Adequate and complete supporting documentation of the activity carried out must be kept for each transaction so that it is always possible to verify the authorisation process, identify the various levels of responsibility, reconstruct the transaction in a chronological manner, as well as determine the characteristics and reasons behind it.

In addition, with particular reference to cash inflows and outflows, the following general rules must be observed:

- payments must be made with prior authorisation from individuals with appropriate powers in accordance with the existing system of powers of attorney and proxies;
- only licensed operators who certify that they are equipped with manual and computerised and/or telematic safeguards designed to prevent unlawful corrupt practices and money laundering must be used for payments;
- checks must be made on the counterparties to whom payments are directed to verify that the name of the supplier/customer and the name of the account to which to send/from which to accept payment fully match;
- every operation or transaction must be supported by adequate supporting documentation; it is also prohibited to:
 - accept incoming payments for which adequate supporting documentation is not found (e.g., absence of sales invoice) or which are from unidentifiable parties (e.g., name/company name, address and account number);
 - adopt payment methods that are inappropriate in view of the nature of transactions or split payments in a manner that differs from what was contractually agreed upon;
 - make payments in countries other than the country where the supplier has established its registered office or operational and commercial branch;
 - make payments to third parties that are not adequately justified in the context of the contractual relationship established with them;
 - use cash in excess of what is permitted by applicable laws or other bearer financial instruments, as well as current accounts or anonymous passbooks or in fictitious names.

7 Training and support

All Group personnel are responsible for compliance with applicable procedures and the proper application of the internal procedural system on anti-corruption and anti-money laundering measures, in connection with the performance of their duties and in compliance with their responsibilities.

The Retelit Group, through the Human Resources Department and the Compliance function, promotes awareness of the Principles of Integrity through training and information sessions provided to all personnel depending on the risk profile associated with the function or activity. In this context, a key role is played by the managers entrusted with respecting and supervising their employees' compliance with this anti-corruption policy.

Rev	Date	Policy 07 – Anti-corruption policy and anti-money laundering measures	Retelit Group
01	03/09/2025	All rights reserved – TLP Green	Pag. 11/13

Training sessions are designed to ensure that personnel understand - clearly, correctly and in relation to their role:

- this Group policy;
- the corruption risks to which they may be subject;
- the actions to be taken to prevent and avoid corrupt acts and money laundering
- the implications and potential consequences of not following the directions presented in the Policy;
- the reports that must be made regarding the risk or suspicion of malpractice.

Specifically, the anti-corruption compliance function has the responsibility and authority for:

- a) supervising the organisation's design and implementation of the anti-corruption management system;
- b) providing advice and guidance to staff on the anti-corruption management system and corruption issues;
- c) ensuring that the anti-corruption management system complies with the requirements of this document;
- d) reporting on the performance of the anti-corruption management system to the Board of Directors, senior management and other supervisory bodies.

The Compliance function has the right to direct and timely access to the Board of Directors and senior management for any issues related to corruption or the anti-corruption management system.

The Group Internal Audit Department ensures the performance of activities to verify and monitor the effective and efficient operation of the internal control system for the prevention of corruption at the Group companies, in line with the approved Audit Plan.

The Supervisory Board, established pursuant to Legislative Decree No. 231/2001, plays a special role in supporting this policy, as its activities include the periodic collection of sensitive information in order to identify potentially risky behaviour. The Organisation, Management and Control Models under Legislative Decree No. 231/2001 adopted by the Group Companies and the corporate regulatory framework are subject to a continuous updating process to adapt to organisational and legislative changes and respond to possible risks of the commission of crimes.

8 Reporting of non-compliant conduct

Violation of this policy, in addition to constituting a violation of mandatory regulations and the Group's Code of Ethics, exposes the subsidiaries and the Group as a whole to the risk of criminal sanctions or convictions, in addition to serious reputational damage. The belief therefore that one is acting for the benefit of a Group company or the Group as a whole does not in any way justify the adoption of conduct contrary to the principles and indications contained in the Anti-Corruption and Anti-Money Laundering Regulations or by this policy.

The Retelit Group strongly encourages Personnel to provide reports of violations, even alleged violations, of this policy or the relevant regulations, through the Whistleblowing Reporting Portal. In accordance with the provisions of Legislative Decree No. 24 of March 10, 2023, implementing the Directive (EU) 2019/1937 (the "Decree") covering "Provisions concerning the protection of persons who report violations of provisions of National and EU law", any unlawful conduct, even alleged, or violations of this policy may be reported through the portal, also anonymously.

You can access the Portal from any device or network without needing to register by visiting <https://retelitwb.retelit.it>.

Rev	Date	Policy 07 – Anti-corruption policy and anti-money laundering measures	Retelit Group
01	03/09/2025	All rights reserved – TLP Green	Pag. 12/13

8.1 Near Misses

The Retelit Group also encourages Personnel to report “corrupt near misses”, also known as “near misses” defined as “events and/or conduct that could amount to corruption and/or ethical violations, but were avoided and/or did not materialise”.

Near misses may be reported through the Whistleblowing Reporting Portal - (<https://retelitwb.retelit.it>), in the manner set out in the preceding paragraph or by writing to the Supervisory Board of the relative Company or the Group compliance department at compliance.gruppoiretelit@retelit.it.

9 Sanctioning measures

Violation of this policy constitutes a disciplinary offense under Article 7 of the Statute of Workers' Rights (Law No. 300 of 1970) and the applicable collective bargaining agreements.

Any type of violation of the conduct rules contained therein may result in the initiation of disciplinary proceedings as provided for in the organisation, management and control models.

Rev	Date	Policy 07 – Anti-corruption policy and anti-money laundering measures	Retelit Group
01	03/09/2025	All rights reserved – TLP Green	Page 13/13

Milan, September 5, 2025

Approval:

Vania Mandruzzato