



Policy Retelit Group

PL.02 – Retelit Group Company Supplier Code of Conduct



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CONTENTS



1	INTRODUCTION	4
2	CODE OF CONDUCT OBJECTIVES.....	4
3	CODE OF CONDUCT RECIPIENTS	4
4	BACKGROUND	5
4.1	REGULATORY FRAMEWORK.....	5
4.2	GENERAL PRINCIPLES	5
5	ETHICS	6
5.1	ANTI-CORRUPTION	7
6	PROTECTING HUMAN AND LABOUR RIGHTS	8
7	ENVIRONMENTAL PROTECTION.....	9
8	IMPLEMENTATION OF THE CODE OF CONDUCT	10
8.1	ADOPTION AND IMPLEMENTATION BY THE GROUP COMPANIES.....	11
8.2	MONITORING, INSPECTION AND REPORTING OF NON-COMPLIANT CONDUCT	12
8.3	SANCTIONS AND CONTRACTUAL TERMINATION.....	12
9	SUPPLIER COMMITMENT	13



1 INTRODUCTION

One of the Retelit Group's objectives is to help build and support increasingly sustainable, inclusive business activities and relationships. We are committed to generating long-term value for our Customers, Suppliers, Partners and the entire community, by encouraging and supporting a responsible purchasing mindset, both within and external to the Group.

On September 25, 2015, the United Nations General Assembly adopted a new global regulatory framework for sustainable development: the 2030 Agenda, which is based around the Sustainable Development Goals (SDGs). The SDGs have since become an integral part of the European Union's strategic framework, which supports the achievement of economic growth that does not harm our planet and which fully respects its resources while improving its inhabitants' quality of life.

This Supplier Code of Conduct (also the "Policy"), whose standards and practices complement our Principles of Integrity, such as the Group Code of Ethics, the Anti-Corruption and Anti-Money Laundering Policy, and the 231 Models, declares that sustainability, in its broadest sense, encompasses the key elements of the Retelit Group's corporate values and is a fundamental part of our business strategy, including as a means of safeguarding the Group's own future.

The Code is divided into the following sections:

- Scope of application, which defines the objectives and addressees of this Policy;
- Background, which outlines the main regulatory sources and principles on which the Policy is based;
- Business Ethics and Integrity, Protection of Human and Workers' Rights, Environmental Protection, and Responsible Production, which constitute the chief requirements in the environmental, social, and Governance areas and represent the guidelines for Responsible Production;
- Code of Conduct Implementation Guidelines, which provides information on dissemination of the Code, verification, monitoring, and potential measures in the event of non-compliance;
- Supplier commitment.

The Code will be periodically reviewed and updated as necessary in order to meet regulatory requirements and to ensure that it remains constantly aligned with key industry standards and best practices. In the event of changes and revisions, Retelit undertakes to promptly share the updated document with its Suppliers.

2 CODE OF CONDUCT OBJECTIVES

This document has the following main objectives:

- To define the principles with which Group Suppliers are required to comply in terms of Ethics, Labour and Human Rights, Environmental Protection and Responsible Production
- To define the company's internal responsibilities for monitoring the application of the principles under the Policy;
- To define measures in the event that non-compliance with this Policy is discovered.

the Retelit Group, including through its subsidiaries, requires that Suppliers and downstream sub-Suppliers throughout the supply chain share and apply the principles set out in this Code of Conduct. Compliance with these principles constitutes a significant factor in the selection and evaluation of and relationship with Suppliers.

3 CODE OF CONDUCT RECIPIENTS

Compliance with this Code of Conduct is mandatory for all Suppliers.

In general, this Policy is addressed to all Retelit Group subsidiaries (direct or indirect) and must be respected and applied by all members of the Group's supervisory, management and control bodies, employees, agents and casual associates (hereinafter also, collectively, the "personnel") and, across the board, to all Group business activities, and at all times in compliance with applicable mandatory regulations.



Specifically, this Policy is intended for all Group Suppliers, who are in any case required to adopt the most restrictive current provisions in the area. The Retelit Group requires that Suppliers share this Policy with sub-Suppliers, subcontractors, contractors and their own employees, and, within their own supply chain, monitor compliance with the principles and standards set out in this document.

Furthermore, Suppliers must comply with this Policy in conjunction with other Retelit Group's Integrity Principles when performing the Contract and throughout the supply chain.

This document is made available to all personnel on the Group Intranet and to all stakeholders through publication on the website, and is also published on the platforms used for supplier qualification and management, in order to ensure that business partners are fully aware of it and apply it.

4 BACKGROUND

4.1 Regulatory Framework

Regarding the goods and services covered by the supply processes, the Retelit Group expects its Suppliers to act at all times in full compliance with every applicable law and regulation in the countries where they operate, observing the principles of Retelit Group Policies and contractual requirements.

Where the provisions under this Policy differ from applicable laws and regulations, Suppliers must adhere to the highest and most stringent standards between the two sources, thereby acting in accordance with applicable laws and regulations and pursuing compliance with the requirements and principles set out in this Code. Should Suppliers identify any differences between applicable laws and regulations and this Policy, they are requested to notify the Group.

The Retelit Group is also committed to contributing to sustainable development, as defined by the United Nations 2030 Goals (SDGs), integrating this commitment into its subsidiaries' business models. With this objective, the Group's commitment stems from its knowledge of the following regulations, which enjoy globally recognised acceptance and consensus:

- the Universal Declaration of Human Rights;
- the United Nations Guiding Principles on Business and Human Rights;
- the International Convention on Civil and Political Rights;
- the International Convention on Economic, Social and Cultural Rights;
- the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and its subsequent editions;
- the International Labour Organisation (ILO)'s Tripartite Declarations on Multinational Enterprises and Social Policy;
- the International Labour Organisation (ILO)'s International Labour Standards regarding occupational health and safety;
- the OECD's Guidelines for Multinational Enterprises;
- the United Nations Convention against Corruption;
- the Rio Declaration on Environment and Development;
- the United Nations 2030 Agenda for Sustainable Development.

4.2 General principles

The Retelit Group is committed to operating in compliance with the fundamental principles concerning ethics, human rights, labour, the environment and combatting corruption. The Group is, however, aware of the value chain's potential impact in these areas, and considers it essential that each of its collaborators, suppliers and subcontractors make a collective commitment to respect and share these principles.



For the Group to remain faithful and consistent to its values, Retelit therefore invites its Suppliers to share its principles, promote honest communication and action, and comply with the highest standards of ethics, integrity and fairness, and social and environmental responsibility.

Specifically, the Retelit Group embraces the UN Global Compact's Ten Principles, enshrining through this document its desire to pursue and support them throughout the supply chain. The Group therefore urges its Suppliers to adopt and integrate the following Ten Principles within their practices, strategies and policies:

Human Rights

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights within their respective spheres of influence;
- Principle 2: make sure that they are not complicit in human rights abuses, even indirectly.

Labour

- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: the elimination of all forms of forced and compulsory labour;
- Principle 5: the effective abolition of child labour;
- Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

- Principle 7: Businesses should support a precautionary approach to environmental challenges;
- Principle 8: undertake initiatives to promote greater environmental responsibility; Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

- Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

5 ETHICS

Retelit Group Suppliers shall comply with the Group's Integrity Principles, conduct their business ethically and act with integrity in accordance with applicable laws and regulations. Suppliers must also adopt appropriate management systems (e.g. procedures, Policies, business processes) to ensure compliance with regulations and principles in this area.

- *Unfair competition*
Suppliers are expected to manage their business in line with the principles of fair competition and in compliance with all applicable antitrust laws in the countries where they operate.
- *Business integrity and Anti-Corruption*
Suppliers must comply with the Retelit Group's Anti-Corruption Policy, must not practice or tolerate any kind of bribery, extortion or embezzlement or money laundering, and must not offer or accept bribes or other illegal inducements from their business partners. Suppliers are also required to adopt policies, processes and procedures to monitor compliance with applicable regulations.
- *Absence of conflicts of interest*
Suppliers must report any relevant conflict of interest, potential or actual, arising during the performance of their activities; a conflict of interest exists when a personal interest or activity interferes or could potentially interfere with the business relationship with the Retelit Group.
- *Whistleblowing*



Suppliers commit to make available and adequately communicate to their employees the existence of methods to report any suspected irregularities or potentially illegal activities; each report must be considered confidential and treated as such, and the supplier undertakes to ensure protection for the reporter by prohibiting retaliation against those who report any irregularities. Suppliers undertake to carefully evaluate all reports received, adopting appropriate corrective measures where necessary.

- ***Privacy, data security, and intellectual property***

Suppliers agree to protect and use in accordance with applicable regulations all information of a confidential nature, ensuring that they protect the privacy, data protection, data security and intellectual property rights of business partners. The use of Retelit Group inside information is prohibited unless expressly authorised in writing by the Group itself. The Retelit Group requires Suppliers to maintain the strictest confidentiality of all technical and commercial know-how, all processes and initiatives of a confidential nature, and in any case all confidential information relating to Group companies' activities, the Group's products and services, and any information of a personal nature of which they may become aware.

- ***Communication and social media***

Suppliers must not publish or share on social media, or disclose through other communication channels, any type of information relating to the Group without specific authorisation, particular as regards information that could damage its image or reputation. Retelit also prohibits the creation of social media accounts under its name, except where specifically authorised by the Group.

5.1 Anti-corruption

In compliance with national and international regulations (e.g., in Italy, those governed by the Penal Code, Book II - Of Crimes and in particular, Title II - Of Crimes against the Public Administration, or abroad, those governed by the "Foreign Corrupt Practices Act" (FCPA) and the "UK Bribery Act" (UKBA) and in application of the provisions of the Ethics Code and in the Anti-Corruption and Anti-Money Laundering Policy, the Retelit Group does not tolerate any form of corruption, whether carried out directly or indirectly, whether it is active (i.e. offered to third parties) or passive (i.e. received from third parties). Suppliers must comply with the Retelit Group's Anti-Corruption Policy and Ethics Code.

The Retelit Group prohibits Suppliers from engaging in any practice of a corrupt nature, including unlawful favours, collusive behaviour, 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 Ethics Code, and in the binding procedures and laws.

As a general rule, therefore, Suppliers are prohibited from promising and offering anything of value to any person in order to obtain or maintain business relationships or to secure an undue advantage in the conduct of business; accepting money or anything of value (or acting on such promises) that may be connected to corrupt behaviour.

All Suppliers are obligated to maintain accurate books and records: all transactions must be properly reflected in the records with an adequate level of detail. Any inaccuracies or omissions in documenting accounting records, even when these are not the result of corrupt activities, also constitute violations of this policy. False records may result in tax and legal liability in other jurisdictions.

Furthermore, as a result of behaviour deemed inconsistent with this Policy, the Retelit Group may be held liable for corrupt behaviour in dealings with third parties; each business partner therefore undergoes mandatory assessment activities for the preliminary verification of ethical requirements.

Violation of Group policies, in addition to constituting a violation of mandatory regulations and the Group's Ethics Code subsidiary, exposes subsidiaries and the Group as a whole to the risk of criminal sanctions or convictions and serious reputational damage; the belief that one is acting for the benefit of a Group company or the Group as a whole cannot therefore in any way justify behaviour that goes against the Group's Integrity Principles and this Policy.



5.2 Dual-Use Export Controls

The Supplier shall comply with applicable export control including, without limitation, Regulation (EU) 2021/821 and any applicable national laws and regulations.

The Supplier warrants that the goods, software, technologies and services provided shall not be used, directly or indirectly, for military purposes, for the proliferation of weapons of mass destruction, or for any other prohibited use under applicable laws and regulations.

The Supplier further undertakes to:

- not export, re-export, transfer or otherwise make available any goods, software or technologies subject to Dual-Use restrictions without the required authorizations;
- implement appropriate internal controls to prevent non-compliant use;
- promptly inform the Company with all information necessary for the Dual-Use classification of the goods and services supplied;
- immediately inform the Company if it becomes aware of any potential non-compliant use or risk of diversion to prohibited uses;
- ensure that its subcontractors comply with equivalent obligations.

In the event of a breach of the above provisions, the Company reserves the right to request further documentation regarding the activities performed and to take any appropriate measures, including suspension or termination of the Contract, as per applicable law and this Code of Conduct..

6 PROTECTING HUMAN AND LABOUR RIGHTS

The Retelit Group is committed to protecting human and labour rights, and therefore requires that each of its Suppliers respect and protect these rights when conducting their business and throughout the supply chain.

▪ *Equality and Non-Discrimination*

Suppliers must treat all people fairly and with respect, promoting workers' dignity, health, freedom and equality and those of everyone involved in the performance of their activities and involved in their supply chain. Specifically, Suppliers must respect the principle of non-discrimination and commit to rejecting any form of discrimination (e.g. on the basis of ethnicity, nationality, gender, age, physical characteristics, disability, social background, union membership, religion, marital status, pregnancy status, sexual orientation, gender identity, gender expression, or any other criteria that are illegal under applicable law).

▪ *Diversity and inclusion*

Retelit Group Suppliers must positively value all forms of diversity (e.g. cultural, gender, ability, age) to guarantee a fair and inclusive work environment, to treat people with the utmost respect and dignity, and to ensure a work environment based around inclusion and support. Suppliers must also guarantee accessibility to physical and logical infrastructure for people with disabilities.

▪ *Working conditions*

Suppliers undertake to ensure that the workplace is free of any kind of harsh or inhumane treatment of employees, and that employees do not suffer harassment, sexual abuse, torture or corporal punishment, mental or physical coercion, verbal abuse, or even the threat of such treatment. Suppliers must also refrain from unfairly terminating employee employment contracts or doing so without clear specific evidence, and must comply with mandatory labour laws to settle any disputes.

▪ *Child labour*

Suppliers agree to comply with applicable regulations and laws on child labour. Suppliers must help to protect the rights of children and to ensure their psychological, emotional, and physical safety and development. In line with ILO international standards, employing individuals under the age of 15 is

8

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generally prohibited. Employing workers under the age of 18 in any activity that could impair their development (e.g., hazardous work, night shifts) is also prohibited. Any exceptions must comply with national and international standards.

- *Prohibition of forced labour*

Slavery, servitude, forced and/or compulsory labour and human trafficking are not tolerated in the supply chain. Suppliers agree to make no use whatsoever of forced, bonded, compulsory or prison labour. The Group also expects Suppliers to have no relationship of any kind with organisations that engage in human trafficking, child labour or forced labour generally.

- *Employment contracts, wages, working hours and benefits*

Suppliers must employ workers through contracts with the employee that comply with applicable provisions on wages, working hours and all statutory benefits for workers. Contracts must be in writing and must be clear and comprehensible to workers.

Supplier employees' working hours must comply with the provisions of applicable laws and regulations. In this regard, we note the maximum limit of forty-eight hours per week stipulated in the ILO Conventions, excluding overtime hours. These must comply with the limits and conditions provided for in the applicable regulations.

Remuneration must be fair, competitive and consistent with applicable norms and standards in the countries where the Suppliers operate, must be paid punctually and must ensure an adequate standard of living for employees and their families. Suppliers should avoid using deductions as a disciplinary measure and should act in accordance with international regulations and standards.

Suppliers should provide their employees with adequate training and educational opportunities and, through such initiatives as they deem appropriate, promote worker well-being.

- *Occupational health and safety*

Suppliers must take all necessary precautions to ensure the health, safety and well-being of workers and staff and guarantee a safe, hygienic and healthy working environment.

Suppliers must mitigate any risk from workplace injuries by providing adequate training on the risks and prevention of accidents and injuries in accordance with occupational health and safety laws, regulations and conventions.

In order to facilitate the monitoring of potential workplace hazards, to reduce accidents and injury rates, and to coordinate and document training activities, Suppliers are encouraged to appoint a person responsible for company health and safety and to have health and safety management system certifications

(e.g. ISO 45001) or management systems in line with the highest available standards.

- *Freedom of association, right to organise and collective bargaining*

Suppliers must respect employees' right to assemble in associations and to bargain collectively; specifically - and in accordance with applicable regulations - Suppliers must respect their employees' right to associate freely, join trade unions, have representatives, join works councils and participate in collective bargaining. Suppliers also agree not to tolerate any discrimination or repercussions towards workers who participate in organisations, associations or unions or act as workers' representatives.

7 ENVIRONMENTAL PROTECTION

The Retelit Group is committed to continuously improving its environmental performance. It therefore requires that all Suppliers actively commit to reducing the environmental impact of the activities they carry out, providing tangible evidence of their progress, so as to preserve the planet's natural resources for future generations.

- *Compliance and environmental standards*



Suppliers must comply with all applicable environmental protection regulations in the area in which they operate, with all applicable safety regulations relating to the products and services they provide, and with any contractually agreed safety requirements, including but not limited to generally accepted industry standards or any contractually agreed quality requirements.

Suppliers are also encouraged to establish an Environmental Management System to help improve environmental responsibility through a risk-based approach centred on relevant international standards. The Retelit Group, notifying the Supplier well in advance, reserves the right to conduct audits based on optional standards (e.g. ISO 14000), either directly or through third parties.

- *Energy consumption and greenhouse gas emissions*

Suppliers are urged to prepare plans for the effective use of energy resources and the reduction of greenhouse gas emissions, thereby contributing to the fight against climate change and the achievement of national, European and international emissions reduction targets. They are encouraged to identify and monitor sources of energy consumption and emissions and, where possible, enact plans to convert to energy from renewable sources. The Retelit Group, notifying the Supplier well in advance, reserves the right to conduct audits based on optional standards (e.g. ISO 50000), either directly or through third parties.

- *Consumption of raw materials, resources and water*

Suppliers are also encouraged to monitor and responsibly manage their consumption of raw materials and water, a resource which, in line with current laws and regulations regarding water withdrawals, should be safeguarded and protected.

- *Waste management*

Suppliers must comply, and ensure that their employees comply, with all environmental laws and regulations related to waste management, paying particular attention to hazardous waste.

Suppliers are encouraged to adopt management plans and systems to reduce waste generation and to promote reuse and recycling.

- *Risk mitigation*

Suppliers are encouraged to put in place contingency plans to prevent, mitigate and control serious environmental and health damage from their activities. The scope of these plans must be appropriate considering the nature of the Supplier's business and the risks related to it, managing environmental impacts at every stage of production or service delivery, from development to delivery and disposal; preference should be given to developing and deploying environmentally friendly technologies.

8 IMPLEMENTATION OF THE CODE OF CONDUCT

The Retelit Group encourages its Suppliers to strive to continuously improve its products and services, in terms of quality, safety, environmental impact and materials used.

- *Quality and Safety*

The quality of the products and services offered by Suppliers is considered a central element of the Retelit Group's Supplier selection and assessment. Suppliers must offer products and services that comply with applicable regulations and are encouraged to avoid, whenever possible, the use of substances and raw materials that may pose a risk to worker and consumer health or which may be detrimental to the environment.

- *Product life cycle and the circular economy*



Retelit seeks to promote sustainability through a circular economy culture, encouraging its Suppliers to continuously improve the environmental performance and durability of their products and services, paying close attention to the entire life cycle and end of life process. Suppliers are encouraged to observe circular economy principles in their product or service design, manufacturing, recycling or disposal, and waste management, at all times in compliance with applicable laws and regulations.

▪ ***Traceability of materials***

Suppliers should ensure that the products supplied and involved in activities carried out for the Group are properly traceable. To ensure transparency in the Retelit Group's value chain, where requested, Suppliers must provide all information regarding the origin of raw materials, the supply process and the manufacturing processes which products undergo.

To ensure full traceability, the Group reserves the right to request information from Suppliers regarding their own Suppliers and subcontractors, such as facility locations and the origin of raw materials used. As a telecommunications company, Retelit expects its Suppliers to pay special attention to the origin of raw materials used. Retelit requires its Suppliers and sub-Suppliers to pay special attention to the sourcing of minerals (including cobalt, mica, tantalum, tin, tungsten, and gold) which originate in conflict zones or the environmentally impactful mining or processing of which takes place in countries or circumstances that present the risk of child labour, illegal operations, or occupational health and safety conditions that do not meet international standards.

8.1 Adoption and implementation by the Group companies

All Group personnel are responsible for complying with this Supplier Code of Conduct and ensuring that it is correctly applied within their internal procedural systems in relation to the performance of their duties and in accordance with their responsibilities.

At the central level, within the scope of its duties, the Group Compliance & Internal Audit function guarantees compliance oversight in Supplier management. It ensures that this Policy is correctly applied and verifies the fulfilment of general requirements, acting directly, carrying out activities to verify and monitor the effective and efficient functioning of the internal control system.

The Compliance & Internal Audit function is therefore responsible for scheduling appropriate inspection activities (annual audit programme), evaluating the findings of these activities, and assessing any remedial, corrective, and improvement measures that may be necessary to remedy nonconformities revealed as part of the audits. Should any needs relating to supplementation, discrepancies or violations arise, this function will formally communicate this outcome to the Senior Management and Supervisory Boards, who will appropriately evaluate the circumstance and take necessary and prompt corrective measures.

Through its Procurement & Corporate Services Department, the Retelit Group promotes awareness of this Policy, the Ethics Code and anti-corruption regulations throughout the supply chain.

The Group's internal training sessions play a key role in this area, as do those managers who are called upon to ensure and supervise their employees' compliance with this policy.

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

- this Group Supplier Code of Conduct;
- the measures to be taken to prevent and avoid behaviour that contravenes this Policy;
- the implications and potential consequences of not following the directions contained herein;



- the reports that must be made regarding the risk or suspicion of malpractice.

8.2 Monitoring, inspection and reporting of non-compliant conduct

All Suppliers should encourage a culture of transparency within their organisation and throughout the supply chain, and support all personnel to stand up for legal and ethical issues, both through management and formal channels.

As such, and in accordance with Legislative Decree No. 24 of March 10, 2023 concerning the protection of persons who report violations of EU law and national regulatory provisions ("Whistleblowing"), a procedure is in place to make an anonymous communication channel available to anyone; this can be reached at: <https://retelitwb.retelit.it/>.

Suppliers are therefore required to immediately report to the Retelit Group any alleged or actual violations of this Policy by their collaborators/employees, or violations of the Group Ethics Code, the Anti-Corruption Policy or the Organisation and Management Model, or any other mandatory regulations, using the channel indicated. Suppliers also agree to retain the documentation and/or information necessary to substantiate these reports. The Retelit Group emphasises that it will not carry out retaliatory actions (disciplinary sanctions, demotion, suspension, dismissal) or discriminate in any way against company personnel who have, in good faith, acted to report events or situations (even apparent ones) relating to compliance with this policy or anti-corruption procedures or otherwise with relevant legal regulations.

Accordingly, Retelit Group Suppliers should also prohibit any retaliation against their employees or contractors who:

- report a problem (even apparent) regarding violation of a law and/or standards of conduct;
- assist Retelit Group companies or relevant authorities by providing information to manage any notification;
- submit complaints to law enforcement agencies.

It is specified that, in this document, the term "retaliation" is intended to mean any unfair treatment, or any threat of such unfair treatment, of whatever nature, resulting from the good faith reporting of an incident or concern.

In any case, Suppliers must ensure their full cooperation with the competent Authorities, and in any case the confidentiality of the sources and information they may come to possess, without prejudice to legal obligations, and in full compliance with privacy regulations.

8.3 Sanctions and contractual termination

This Policy is effective from the moment of its formal publication on the Group's intranet and website, and simultaneous issue of the relevant internal announcement.

The Retelit Group reserves the right to conduct checks at any time, through audits conducted by internal staff and/or third-party appointees, with prior notice, on the matters and areas covered by this Code of Conduct. Upon a request from the Group, Suppliers must be available to provide Retelit with documentation, clarifications and any evidence, guaranteeing their full cooperation. When nonconformities are detected, the Group:

- will request that Suppliers prepare and subsequently enact a recovery plan for the nonconformities identified;
- will conduct documentary checks and/or other inspection activities to ascertain the effective adoption of the above recovery plans.
- Should Suppliers violate the principles of this Code of Conduct, or in the event that nonconformities are identified and the planned improvement plans are not prepared and enacted, the Retelit Group reserves the right to precautionary suspension and/or early termination with immediate effect of any business relationship, and to take action for compensation for any loss, damage, expense or other costs that may arise from any non-compliance and/or conduct by Suppliers.



9 SUPPLIER COMMITMENT

Suppliers are required - and undertake to - enact management systems which facilitate compliance with applicable laws and promote continuous improvement in relation to the expectations set out in this Policy. This includes the following aspects:

- *Legal and other requirements*
Suppliers agree to comply with all applicable laws, regulations, contractual agreements and generally recognised standards.
- *Communicating sustainability criteria to the supply chain*
Suppliers must communicate the principles outlined in this Code of Conduct throughout their supply chain.
- *Commitment and responsibilities*
Suppliers are urged to allocate sufficient and appropriate resources to meet the expectations and requirements of this Code of Conduct.
- *Training and competence*
Suppliers must establish the training measures required to provide their managers and employees with adequate knowledge and understanding of the content of this Code of Conduct and the reporting channel provided for any irregularities, in addition to applicable laws and regulations and generally recognised standards.
- *Risk management*
Suppliers must introduce the necessary mechanisms to identify, assess and manage risks in all areas covered by this Code of Conduct, and in relation to all applicable legal requirements.
- *Documentation*
Suppliers must prepare and maintain the appropriate documentary facility to allow them to demonstrate that they share the principles and values expressed in this Code of Conduct and that they are concretely applied to daily operations; Suppliers may be required to provide such documentation for review during audits.
- *Continuous improvement*
Suppliers are expected to seek continuous improvement in their sustainability performance by taking the appropriate measures.

The Retelit Group emphasises that acceptance of and strict adherence to this Code is a fundamental part of its Supplier management and assessment.