



CODE OF ETHICS

RETELIT S.p.A.

Via Pola, 9 - 20124 Milano (MI) - Tel. (39) 02 2020 45.1 - Fax (39) 02 2020 45.225

Capitale Sociale Euro 30.000.000, i.v. - R.E.A. 1595443 - Registro Imprese di Milano - Codice Fiscale e P.IVA 12897160151 - www.retelit.it



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THE RETELIT GROUP

Retelit is Italy's largest telecommunications player focused on the B2B market and the largest the Italian leader in constructing tailor-made digital transformation projects, executed on entirely Group-managed platforms.

In our 20 years, it has been the ideal partner for enterprises, the public sector and operators seeking to tackle head-on the challenges of innovation, thanks to a range which covers the entire value chain of ICT and digitalisation services, from infrastructure to data, from networks to applications. The combination of Retelit's proprietary assets (a comprehensive fiber-optic network in Italy and across the world and a nationwide Data Center network) and the innovation and digital expertise stemming from major M&A's has created a unique player in Italy which can offer integrated digital solutions. Retelit is wholly-owned by Asterion.



SCOPE AND ADDRESSEES OF THE CODE

The Retelit Group seeks to ensure that its values constitute an integral part of the corporate culture, and that they underpin the standard of conduct that all the Group's collaborators, both internal and external, must respect in the management of their activities.

This Code of Ethics is addressed to members of the Group's administrative and control bodies, to employees of Retelit S.p.A. and all its subsidiaries, and to all third parties, such as suppliers and trade and industrial partners, who collaborate or work in the name of, on behalf of, or in the interest of the Retelit Group, wherever they may operate and in whatever way they may contribute to creating value for the Group companies.

Moral integrity is a feature of our organisation and is required of all those working with the Retelit Group.

The Code establishes a model of reciprocal cooperation with, and to the benefit of, the parties involved and is therefore binding on all those working with Retelit Group companies, both directly and indirectly, on an ongoing basis or temporarily. All addressees, through their conduct, in the execution of the duties and tasks entrusted to them, represent the Retelit Group and must therefore respect this Code.

What do we expect from Addressees of the Code of Ethics?

From Retelit Group personnel

All Group personnel must undertake to observe and enforce, without exception, the principles and behaviours detailed in the Code of Ethics. Employees are expected to act in a professional manner. Violation of applicable laws, the principles of the Code of Ethics, or the guidelines defined by the Group is never justified, even where there is a belief that one is acting in the Group's interest and/or for its benefit.

From our managers

All Group managers must be committed to respecting and disseminating the ethical standards and principles defined in the Code, being a point of reference, and providing support in the event of requests for clarification or to facilitate any reports of violations. The role of a manager is critical in establishing a work environment that encourages employees to discuss concerns about behaviours while performing tasks.

From our partners and third parties

Partners and third parties who collaborate or wish to collaborate with the Group, such as consultants, agents, suppliers, customers, are required to respect the ethical principles and conduct defined in this Code. This commitment is concretely specified through specific contractual clauses

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in all dealings with third parties, the violation of which constitutes breach of contract that may result in termination of the contract.

What should I do in the event of uncertainty?

Doubts or Questions?

If you have any doubts or questions about the legality of a particular action or the application of a principle of this Code of Ethics, you can contact the Group Compliance Department.

Reporting

Remember that all Addressees of this Code are required to promptly report violations of which they are directly aware - including by means of the tools provided by the Group and including alleged violations - of the Code of Ethics, the 231 Model or the procedures established for its implementation.

What Reporting tools are available to me?

❖ ***Whistleblowing Portal <https://retelitwb.retelit.it/#/>***

The Whistleblowing Portal allows you to report unlawful conduct, also anonymously; there is no exhaustive list of offences but bear in mind that whistleblowing is a tool to protect the integrity of the Company. As such it must bring to light risks to which the Company is exposed, actions or omissions committed or attempted in violation of laws, regulations, Authority measures, the Organisation, management and control model pursuant to Legislative Decree No. 231/2001, the Code of Ethics or other company provisions. Reports will be dealt with by the relevant Supervisory Board.

❖ ***“Raise Your Hand” Portal <https://alzalamano.retelit.it>***

The “Raise Your Hand” Portal allows you to report disrespectful or discriminatory behaviour within the work environment. Reports can also be made anonymously. Reports will be dealt with by the Diversity & Inclusion Committee, which is expressly responsible for reviewing Reports and carrying out appropriate verification and investigative activities.

*Remember that you can also communicate with the **Diversity & Inclusion Committee** at the address deicommittee@retelit.it to learn about initiatives and projects or to bring significant aspects or improvements in the area of Diversity, Equality and Inclusion to the attention of the Committee.*



VISION AND VALUES

Mission

To guarantee our customers the best possible digitalisation experience, and make their businesses more competitive. Use our expertise and passion to become the absolute leader in innovative and integrated business solutions.

Vision

In a world where people and businesses are increasingly interconnected, the Group believes in the power of communications technology to create successful companies. By developing ICT solutions and guiding businesses through their digital transformation, we aim to contribute to the creation of value through innovation.

OUR VALUES

- Respect:** We promote the centrality and enhancement of our employees, protecting them through impartiality in choices, freedom of thought, conscience and religion, safety, and adequate and continuous training. We do not tolerate actions or comments of a sexual, racial or religious nature or behaviour or comments that may contribute to a negative working environment.
- Excellence** We find innovative, original solutions to anticipate and satisfy the needs of our customers.
- Entrepreneurship** We turn ideas into solutions using creativity, initiative, proactivity, the ability to take risks and the courage to dare.
- Integrity** We believe in relationships between customers, employees, collaborators and partners that are transparent and based on authenticity, sincerity and consistency.
- Agility** We swiftly adapt our organization and our solutions to changes in technology and in our customers' needs, incorporating new skills into our product range with agility.
- Community** We develop regional infrastructure with an awareness of our role and responsibilities within the economic and social community in which we operate.
- Legality and Compliance** We do not tolerate any form of non-compliance with the law or fraudulent attitudes or conduct, corruption or abuse of office, even if this is carried out for the benefit of the Company and/or committed indirectly through companies or third parties.



OUR PRINCIPLES

Fairness and transparency

The Group commits to provide complete, timely and truthful disclosure, guaranteeing the transparency of the decisions undertaken. Complete communication is guaranteed for all those who sign agreements or contracts with the Group, in order to clearly establish the conduct expected.

Legality and honesty

The Retelit Group commits to conduct operations in full compliance with applicable regulations, the Code and internal regulations, ensuring that the decisions undertaken are not associated with, even only potentially, personal interests or are against the fiduciary duties on which the company role is based. This commitment extends to consultants, suppliers, customers and anyone who has dealings with Group companies.

Impartiality

The Retelit Group fully respects the characteristics of the individual, encouraging a spirit of belonging and professionalism, integrity and a sense of responsibility, in line with the principles of liberty, dignity of the individual and respect for diversity, rejecting all discrimination based on age, gender, sexual orientation, state of health, race, ethnicity, nationality, language, personal and social conditions, religious beliefs and political and trade union opinions.

Sustainability

The Retelit Group is committed to contributing to the achievement of the United Nations Sustainable Development Goals (SDGS) by adopting responsible business models based on continuous innovation and technological development with a view to creating shared and sustainable value.

The Retelit Group's actions are also inspired by the principles contained:

- in the United Nations' Universal Declaration of Human Rights;
- in the European Union's Charter of Fundamental Rights;
- the Decent Work Indicators issued by the ILO (International Labour Organisation);
- in the OECD (Organisation for Economic Cooperation and Development) Guidelines for multinational companies;
- in the local and international Anti-Bribery regulations (e.g. OECD Anti-Bribery Convention, Legislative Decree No. 231/2001, Foreign Corrupt Practices Act, Bribery Act, Loi Sapin 2, Ley Organica, etc.).



How do I make good decisions?

Our goal is to do the right thing. If the right thing to do is unclear, ask yourself if:

- *it is consistent with the Group Code of Ethics;*
- *it complies with regulatory principles;*
- *it follows the Group's policies;*
- *is it beneficial to the Group companies as a whole, not just to an individual or group?*
- *you would feel comfortable if your actions were made public.*

If the answer to all of these questions is "YES", then the action is probably okay.

If the answer is "no" or even "maybe" it is a signal to stop and get advice or ask questions. After all, it's always best to ask before you act, especially when you're not sure.



OUR RESPONSIBILITY TO PROTECT PEOPLE

The Retelit Group is aware that its people are a fundamental element for the achievement of corporate objectives and business growth, and for this reason it develops policies that target enhancement and continuous development. The Group promotes equal opportunities to allow everyone to fully express themselves. Diversity is a fundamental value and no discrimination based on ethnicity, nationality, gender, sexual orientation, disability, age, political or religious beliefs, or other personal characteristics is tolerated. It is a priority for the Retelit Group to create an inclusive and safe working environment that guarantees each individual the right to physical and psychological integrity and the right to opinion and association.

We promote inclusion and value diversity

Diversity and inclusion are strategic elements for the Retelit Group, which pursues the goal of promoting an inclusive environment by encouraging diversity within its teams to foster innovation, entrepreneurship, creativity and to improve the performance of its staff and the company itself.

All employees are expected to create and maintain a respectful and considerate working environment, where the differences and experiences of others are valued, assigning appropriate value to initiatives and encouraging trust and acceptance in the workplace. The Group's commitment is also enshrined in its "Diversity and Inclusion Policy", which formalises its commitment to promoting gender diversity, protecting the role of parents, developing innovative welfare policies, and promoting a healthy work-life balance.

It is the responsibility of each of us to embrace diversity and foster inclusion in every area of our business.

We protect and promote human rights

The Group respects and protects Human Rights. The values, principles and policies defined by the Retelit Group intend to promote and respect the criteria contained in the United Nations' International Charter of Human Rights, and the Fundamental Principles and Labour Standards issued by the International Labour Organisation.

The issues governed by the company's policies seek to guarantee safe working conditions, prohibit discrimination, child or forced labour, and human trafficking, and to guarantee fair compensation to employees in relation to the hours worked.

It is the responsibility of each of us to constantly monitor our behaviour to ensure that all basic human rights are respected.

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We do not tolerate any kind of discrimination

The Retelit Group intends to ensure that its staff are able to develop their skills and to contribute to the growth of the Group. It therefore considers it vital to prevent discrimination permeating recruitment activities and/or the daily management of company activities.

The process of selecting the best candidates must be based on merit, qualifications and work performance. Factors not related to the work tasks at hand must not be taken into consideration, and these include: race, ethnicity, country of origin, religion, gender or sexual identity, sexual orientation, age, disability.

We all have a duty to behave respectfully and inclusively to provide people with opportunities to improve their skills within the Group.

We provide a safe working environment

The Retelit Group provides a working environment that is free from violence, harassment, or any other harmful conduct. The Group complies with all national and local laws prohibiting harassment, and through the Code, it is committed to a zero-tolerance approach to behaviour that makes people feel threatened, harmed and/or unsafe in the workplace. The concept of harassment can be encapsulated in the following points:

- sexual harassment;
- offensive language, comments or jokes;
- racial, ethnic, sexual, or religious slurs;
- intimidating, threatening, or hostile behaviour toward other people.

The Group also prohibits the possession of weapons in the workplace and within the Group's owned facilities, including car parks.

The Company's zero-tolerance policy on violence in the workplace applies to all Group employees, who are required to report instances of harassment using the tools provided.

It is the responsibility of each of us to respect and protect others and to make a commitment to immediately report any instances of possible discrimination or harassment.

We protect Health and Safety in the workplace

The Retelit Group is committed to disseminating and consolidating a culture of health and safety in the workplace, safeguarding all employees and stakeholders it interacts with. The Group's Health and Safety policies and procedures are structured with the goal of providing a safe working environment at company facilities.

The Group's senior management invites staff and collaborators to report any situations in which they are asked to perform a task that is excessively complex in relation to ability or unsafe and/or



where a tool used to perform the task does not function properly and/or may create safety hazards, and to use the prevention tools and protections made available.

In addition, all personnel are prohibited from:

- possessing, selling, using and distributing any kind of drug or illegal substances while on Retelit premises or during working hours;
- working under the influence of regularly prescribed medications that could affect and compromise their safety or that of others.

It is the responsibility of each of us to always put safety first and to behave so that every function is performed safely and transparently, no matter what the activity.



OUR RESPONSIBILITY TO OPERATE WITH INTEGRITY

We prevent and manage conflicts of interest

The Retelit Group is committed to complying with these principles, which guarantee the transparency and fairness of transactions involving the Board of Directors, the Board of Statutory Auditors, and related parties.

In conducting activities, it is a priority to avoid situations in which the parties involved in company operations are, or may appear to be, in conflict of interest. Employees and collaborators must avoid any situation, and abstain from any activity, which may contrast a personal and/or family interest against those of the Retelit Group, or which may interfere and hinder their capacity to undertake, in an impartial and objective manner, decisions in the interests of the Group. Any conflict of interest, even indirect or potential, should be reported in a timely manner to the Supervisory Board for the assessment of its existence and gravity and to decide as to whether the consequent effects may be overcome or mitigated.

For example purposes, conflicts of interest may occur in the following situations:

- economic and financial interests of the employee and/or of their family in activities with customers, suppliers and competitors;
- utilisation of their position in the Group or of information acquired in a manner which may create conflict between their personal interests and company interests;
- the carrying out of any work for customers, suppliers and competitors;
- the acceptance of money, favours or other benefits from people who have, or intend to enter into, a relationship with Retelit Group companies.

It is the responsibility of each of us to avoid situations and behaviours in which self-interest may interfere even potentially with our ability to make an objective decision.

Combatting corruption and money laundering practices

The addressees of this Code must not be involved in transactions that do not comply with the principles of anti-corruption and anti-money laundering, which, under Article 648-*bis* of the Penal Code, means the changeover or transfer of money, property or other benefits of illegal provenance, or in carrying out action (related to these) that may obstruct the identification of their origin, obtaining proceeds from illegal and criminal activities.

It is the duty of all Retelit Group personnel, through specific preventive checks on customers and suppliers using appropriate information channels, to assess their respectability and legitimacy before engaging in business relationships.

The Group must at all times comply with the application of anti-money laundering laws in any relevant jurisdiction.

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It is the responsibility of each of us to oppose all forms of corruption involving anyone, without exception.

We ensure transparency of accounting activities

Every staff member has an obligation to help ensure that financial transactions carried out in corporate management are entered promptly and correctly into the company's accounts. The transparency of accounting activities is based on the truthfulness, completeness and accuracy of accounting records.

Each record must accurately reflect what is in the document in the Group's possession, which must ensure that all company documents - including financial statements, non-financial reporting, contracts and agreements - accurately provide a true representation of the facts.

Staff have a duty to check that documents are complete and truthful, and to report any detected falsifications and/or omissions either to their manager or to the Compliance function or even anonymously, using the tools provided by the Group. It is essential that the documentation for each record is archived in order to ensure traceability of authorisation processes and to allow assessment of the criteria for completeness and appropriateness. It is the responsibility of each of us to maintain accurate company records and to communicate transparent and truthful information to the outside world at all times.

We protect sensitive data and safeguard privacy

The Retelit Group complies with the applicable requirements for the protection of personal data, as governed by the legislation for the protection of individuals with regard to the processing of personal data and the free movement of such data pursuant to Regulation EU 679/2016 (GDPR).

As regards the processing of employee, contractor, supplier, and customer personal data, the Group must make the appropriate disclosures regarding the data processed, how it is processed, and must adopt adequate security measures to ensure the confidentiality, integrity, and availability of personal data.

Personal data must be processed lawfully and fairly, in accordance with the principle of minimisation and limitation of processing. Data will be stored for a period of time no longer than necessary to achieve the purposes for which the data are collected, and in any case as provided in the privacy policy under Article 13 and 14 of the GDPR.

It is the responsibility of each of us to protect the personal data to which we have access and to safeguard the right to privacy of all stakeholders by complying with the regulations in force.



We operate in the marketplace fairly

The Retelit Group always competes fairly with its competitors, recognising that this principle is vital to the development of the market, its customers, and its stakeholders. All staff and collaborators are obliged to behave correctly towards competitors, as governed by the Group’s Anti-Corruption Policy: they must not discredit the activities carried out by competitors, communicate false information, or attract their customers by carrying out prohibited actions.

It is the responsibility of each of us to comply with regulations that protect fair competition

We respect the Company's image

The Retelit Group's reputation derives from the day-to-day behaviours of its personnel and corporate communications. When using company resources, the Internet and social networks, the Group's staff must respect the company principles identified in the Code. Furthermore, it is of fundamental importance to interact with stakeholders in a manner consistent with the company's mission, enhancing the Retelit brand and the value and solidity of the Group perceived by all stakeholders. The activities carried out by personnel on social networks are in the public domain and it is forbidden to carry out any action that could damage the company's reputation.

It is everyone's responsibility to protect the Company's reputation by acting in accordance with the principles of this Code.

OUR RESPONSIBILITY TO STAKEHOLDERS

Customer Relations

The Retelit Group recognises the primary importance of its customers. In decisions relating to strategic choices and commercial policies, Retelit Group companies follows best practices and the criterion of professional loyalty to all customers. The Group is committed to promoting and encouraging the purchase of its services while respecting all the principles of protecting the interests of consumers, ensuring its presence not only in the acquisition phase but also in after-sales services. Retelit's staff are required to interact with customers by observing internal company procedures, guaranteeing, within the limits of contractual provisions, high-quality services and transparent, impartial, complete and clear information about the services offered.

It is the responsibility of each of us to provide quality service and professional loyalty to our customers by committing to build a business relationship based on ethics and integrity.



Relations with suppliers, collaborators and consultants

The Retelit Group is committed to maintaining maximum transparency in its relations with suppliers, collaborators and consultants in general.

All those who collaborate with the Group must carry out their activities in a loyal manner, respecting their contractual clauses, the obligations in this Code, and following standards and rules that aim to respect Human Rights and the principles of sustainability that the Group promotes.

Retelit Group personnel therefore comply with internal procedures for qualifying, selecting and monitoring suppliers, reporting any non-compliances or violations of the Code by external collaborators to their manager or to the Compliance Function.

It is the responsibility of each of us to establish business relationships with suppliers based on the principles of transparency, ethics and integrity, in full compliance with the law.

Relations with shareholders

The Retelit Group is committed to maximising the value of the company by respecting the rights of shareholders and protecting their interests. The Group adopts a corporate governance strategy that respects the criteria of transparency and timeliness of communications to shareholders. The Group believes that it is of primary importance to maintain a continuous exchange of information with shareholders in order to ensure the creation of value in the long term, which is sustainable and respects all the principles within this Code.

It is the responsibility of each of us to contribute to developing the Group companies and to creating value for our shareholders that is sustainable over time.

Relations with Public Institutions

The Retelit Group supports relations and active collaboration with national and local public institutions, identifying in advance the functions authorised to maintain such relationships. Personnel undertake not to communicate untrue information that could mislead the Public Administration, and not to promise/give money, gifts, employment opportunities and benefits of any kind in order to obtain an advantage for the Group. Gifts may only be given for a minimal value that does not affect the integrity of the individuals involved. Funding of political parties, political and labour movements and organisations is prohibited.

It is the responsibility of each of us to establish relationships with the authorities that are based on the principles of fairness, transparency and traceability, promoting dialogue and cooperation.



Relations with Public Supervisory Authorities

When performing its activities, the Retelit Group operates lawfully and correctly and in compliance with the law, cooperating with representatives of the Judicial Authority, Law Enforcement and any Public Official with inspection powers. The destruction or alteration of records, minutes, accounting entries, and any kind of document is prohibited, as is making false statements to competent authorities or attempting to persuade others to provide misleading information to competent authorities. In the event of investigations and inspections, receipt of subpoenas, service of other judicial orders, for events relating to the employment relationship, you must inform your supervisor or the Compliance Department, who will in turn notify the Human Resources Department.

It is the responsibility of each of us to cooperate promptly with the authorities by providing the required documentation in a timely manner.

Relations with local communities

The Retelit Group recognises the importance of creating a long-term collaborative relationship with local communities, in particular with the local area, regional authorities, local public entities and university hubs, focusing on local development in line with its mission and vision. In order to achieve an ever greater level of interaction, the Group takes into account environmental aspects, occupational safety and respect for Human Rights.

It is the responsibility of each of us to contribute to the development and well-being of the communities in which we operate, establishing virtuous relationships in accordance with the principles of this Code.

External communication

We ensure that every institutional communication follows a precise process to allow Group senior management to check and approve its form and content. Relations between the Company and the mass media are the exclusive responsibility of the corporate functions delegated to them and must be conducted in compliance with the Company’s communication methodologies. We ensure that information and announcements relating to the Company and issued externally are prompt, accurate, truthful, complete and transparent.

It is the responsibility of each of us to observe procedures for external communication, complying with the directions of management and the competent functions.

Political forces and trade unions

In dealings with political and labour organisations, we abide by the ethical principles of fairness, cooperation and the utmost transparency. We do not contribute to financing political parties or candidates, labour organisations or committees, either directly or through third parties, with the



exception of contributions provided for under current regulations, and we do not exert direct or indirect pressure on political figures. Directors, Executives and employees may not engage in political activity during working hours or use property or equipment for that purpose.

It is the responsibility of each of us to behave in a manner that complies with the principles set out herein and with the utmost transparency.



PROMOTION AND DISSEMINATION OF THE CODE OF ETHICS

The Administrative Bodies of Retelit Group Companies are responsible for promoting, updating and disseminating the Code, which must be adopted and enacted by all Group Companies. The main objective is to raise awareness of the values and principles expressed in the Code, as well as to facilitate the application and use of the Code of Ethics to all stakeholders.

To ensure that it is fully accessible to all addressees and stakeholders, the Code of Ethics is made available through company intranets and on websites.

Each Department Manager, within the scope of their activities, is responsible for disseminating the principles contained in the Code both within their own department and with business partners and with other parties with whom they collaborate, and is active in proposing amendments and/or updates. In addition, to ensure that the Code is widely understood, it is disseminated and promoted through a variety of actions, including specific training.

If there is any doubt about the interpretation or content of the Code, the Group Compliance Department may be contacted for clarification, except as regards the detection of any violations, which should be addressed to the Supervisory Board through the reporting channels made available by Group Companies (e.g. the Whistleblowing Portal).

REPORTS AND THE PRINCIPLE OF ZERO RETALIATION

The Retelit Group promotes a policy of maximum communication by encouraging its employees and staff to comply with the obligations contained in this Code.

In the event of suspected or actual violations, the Retelit Group invites its employees and other stakeholders to ask for explanations or make reports using one of the following channels:

❖ **Whistleblowing Portal** <https://retelitwb.retelit.it/#/>

The Whistleblowing Portal allows you to report unlawful conduct, also anonymously, in violation of laws, regulations, Authority measures, the Organisation, management and control model pursuant to Legislative Decree No. 231/2001, the Code of Ethics or other company provisions. Reports will be dealt with by the relevant Supervisory Board.

The Supervisory Board can also receive reports by **Regular Post** to the address Via Pola 9, 20124 Milan, C/O Supervisory Board, indicating that this is a CONFIDENTIAL communication, or by **email or requesting a meeting**. The tools provided also allow for audio files to be attached. Contact information for the Supervisory Boards can be found via the Group intranet, on the corporate governance page.

❖ **“Raise Your Hand” Portal** <https://alzalmano.retelit.it>



The “Raise Your Hand” Portal allows you to report disrespectful or discriminatory behaviour within the work environment. Reports can also be made anonymously. Reports will be dealt with by the Diversity & Inclusion Committee, which is expressly responsible for reviewing Reports and carrying out appropriate verification and investigative activities. For inquiries or suggestions regarding Diversity & Inclusion you can also contact the Diversity & Inclusion Committee at deiccommittee@retelit.it.

The competent individuals undertake to investigate all issues identified and to provide due feedback, while respecting privacy with regard to the processing of issues reported.

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VIOLATION OF THE CODE OF ETHICS AND DISCIPLINARY SYSTEM

Compliance with the Code of Ethics and company regulations is to be considered an important aspect of the contractual obligations assumed by the employee upon hiring.

We consider compliance with the principles of this Code to be an essential part of company employees' contractual obligations under the applicable regulations (Article 2104 of the Civil Code "diligence of the employee"). As such, failure to comply with the principles of the Code constitutes a disciplinary offence and shall entail the application of sanctions (based on the principle of gradualness, pursuant to Article 7 of the Worker's Statute, the applicable national collective bargaining agreements and the Company's disciplinary regulations), and may result in compensation for any damages caused by the violation.

If the violation of the rules of this Code of Ethics is committed by those acting in the name of or on behalf of and in the interest or advantage of the Company, or by another person with contractual relations with the Company, any sanction may result in the termination of the existing contract. For all other addressees of the Code of Ethics, in the event of violation of the principles and contents of the Code, the contractual remedies provided for in accordance with and to the effects of the applicable law will be activated.

Any violations of the Code by collaborators, consultants and third parties are sanctioned in accordance with the provisions of the specific contractual clauses included in the relative contracts, as well as in accordance with the laws in force.

For employees of another company who work for the Group under a contract falling into one of the categories set out in Law No. 96 of August 9, 2018 as amended, the company providing the temporary labour or posting the employee on secondment must assume a contractual obligation to have its employees in service with the Retelit Group comply with the Code, subject to payment of penalties or termination of the contractual relationship.