

INTEGRATED POLICY OF POSTE ITALIANE GROUP

Approved by the Board of Directors on 21 February 2025

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The Poste Italiane Group constitutes the largest integrated, omni-channel service platform in Italy, active in logistics, mail and parcels, financial and insurance services, payment systems, telephony and the energy market. It is a point of reference for families and businesses, a natural partner for the Public Administration in the development of services for citizens, and has been able to evolve and innovate while maintaining its values.

The Poste Italiane Group (hereinafter Poste Italiane) considers it essential, for the development of its activities, to comply with internal and external, voluntary and mandatory regulations, the quality of its processes and related services, the health and safety of workers, responsible action towards the environment, the prevention of corruption, information security and the protection of personal data, in order to ensure maximum effectiveness and efficiency of processes, activities and resources. This pathway is consistent with the fundamental company values of Poste Italiane, as well as with the strategic business guidelines and the Group's sustainability strategy.

To achieve these objectives, Poste Italiane has decided to oversee, in an integrated and centralized logic, the management systems currently present in the Group perimeter ("Integrated Management System").

This Policy reflects these choices by "integrating" the various aspects for which Poste Italiane defines and documents its commitment, to all its stakeholders, to improve its performance and at the same time build and develop relationships of trust with them within a path of generating and sharing value and with a view to reconciling their respective interests. To guarantee this commitment, Poste Italiane has adopted a Code of Ethics that is widely disseminated to all Group counterparties.

In the daily conduct of its activities, Poste Italiane, therefore, undertakes to comply with the current standards: ISO 37301:2021 for the management of Compliance, ISO 9001:2015 for Quality Management, ISO 45001:2023 for the management of Health and Safety at Work, ISO 14001:2015 for the management of the Environment, ISO 37001:2016 to prevent cases that could result in potential and/or actual crimes of corruption, ISO/IEC 27001:2022 (with extension to ISO/IEC 27017:2015 and ISO/IEC 27018:2019) and ISO/IEC 20000-1:2018 respectively for the management of information security (extended to cloud services) and for the management of information systems to support business processes.

In carrying out its activity, from an integrated perspective, Poste Italiane undertakes to:

- Adopt Risk-Based Thinking as a strategic tool for business management, aimed both at mitigating all the risks associated with the activities carried out, and at identifying and consolidating opportunities for improvement of its products and processes;
- Use suitable tools and indicators to monitor performance in terms of compliance, quality, health and safety of workers, environment, information security, prevention of corruption;
- Initiate verification phases of the activities and results obtained with respect to certifications, through self-monitoring of the Systems, with a view to continuous improvement;

- Make staff aware of the most relevant issues of Management Systems, through the use of the most appropriate tools and channels, with a view to continuous improvement of processes;
- Develop the informative and experiential heritage, through the continuous training of personnel, for the achievement of the set objectives of the Management Systems;
- Promote reports of any critical issues found in the application of the Management Systems and highlight the initiatives taken in response to the guidelines dictated by the Policy;
- Make the data relating to its activities available on the dedicated institutional website;
- Submit the Management Systems to the verification of an external Certification Body.

COMPLIANCE

With regard to compliance management issues, Poste Italiane S.p.A. undertakes to carry out its activities in accordance with ISO 37301:2021, through the adoption of the following principles and activities:

- Implement control systems to prevent the commission of offences and to ensure conduct based on the criteria of fairness, loyalty and moral integrity;
- Ensure continuous monitoring of regulatory developments in order to ensure implementation, ensure dissemination and promote awareness of the applicable rules and regulations;
- Observe, at all company levels, all laws, rules and regulations and apply appropriate disciplinary procedures, sanctions and corrective measures in the event of violation or non-compliance;
- Promptly adapt company processes to changes in the provisions applicable to the Group, including through a preventive approach to non-compliance risks and by establishing adequate controls to identify critical issues and potential violations of internal and external regulations;
- Conduct its activities in such a way as not to commit any violation of the law, whether direct or indirect, and not to facilitate or risk involvement in illegal situations, with public or private entities;
- Provide a framework for identifying, reviewing and achieving compliance objectives, including with a view to continuous improvement;
- Set up internal tools, both regulatory and operational, that define rules of conduct, principles and/or control models aimed at the proper identification, measurement, management and monitoring of the main compliance-related risks;
- Identify compliance roles and responsibilities within the organization, both centrally and across regulatory areas and business sectors, and assign the resources needed to identify and achieve compliance objectives;
- Ensure the integration of compliance aspects within the Internal Control and Risk Management System, including through information and technological systems for the mapping, evaluation and processing of compliance requirements;
- Encourage the reporting of suspicions in good faith or on the basis of a reasonable belief of regulatory violations, without fear of retaliation and ensuring that no whistleblower is discriminated against with effects on working conditions related to the report;
- Pursue any behaviour that does not comply with the regulations through the application of the company's disciplinary system, ensuring the necessary legal protection measures, as well as any corrective and improvement actions;
- Encourage every possible effort to prevent the commission of illegal acts by third parties having relationships with the company, including joint venture partners and subjects up and down the supply chain (e.g. agents, intermediaries, vendors, contractors, suppliers);
- Identify a Compliance Function that has the appropriate competence, status, authority and independence for the exercise of its role, consisting of supervising the design and implementation of the system, providing advice to personnel and adequate training on compliance, ensuring appropriate compliance models with the applicable regulations and in particular with the ISO 37301:2021 standard and being responsible for the overall Compliance Management System;

- Ensure effective and transparent communication that guarantees the dissemination of the culture of rules at all organisational levels, through awareness and knowledge of information useful for compliance with applicable internal and external regulations.
- Adopt monitoring and reporting tools aimed at verifying the effectiveness of the internal control system over time, ensuring adequate information flows also with regard to relevant compliance aspects.

QUALITY

With regard to Quality issues, Poste Italiane S.p.A. undertakes to carry out its activities in accordance with ISO 9001:2015, through the adoption of the following principles:

- Nurture lasting relationships of mutual trust with its customers through initiatives that are close to their needs, local realities and support the development of territories; with the aim of promoting sustainable, digital and inclusive development of the country;
- Maintain adequate service quality, in particular by ensuring efficiency and continuity of service in accordance with the specific requirements;
- Maintain adequate services offered to customers;
- Respect time and optimise the cost/quality ratio of products/services.

HEALTH AND SAFETY IN THE WORKPLACE

The prevention of occupational risks is a fundamental principle to which every worker must be inspired in the exercise of their daily activity.

The organic control of all aspects of health and safety is guaranteed by the adoption of a Workplace Health and Safety Management System (WHSMS), implemented in compliance with the requirements of the ISO 45001:2023 standard. Poste Italiane S.p.A. undertakes to carry out its activities through the following principles:

- ensure safe and healthy working conditions, in relation to all processes and workplaces;
- compliance with current legislation and any other signed requirement to ensure compliance with the provisions on health and safety at work;
- raise awareness and involve all those who work within the Company or have relationships with it, through the dissemination of the safety culture, for its maintenance and constant improvement;
- continuous improvement of performance, through regular monitoring and review of occupational health and safety objectives.

The factors through which this Policy is implemented, for the aspects of Occupational Health and Safety, are:

- updating the risk assessment, rules and procedures for each activity that involves risks, in order to ensure a higher level of safety and combating the accident phenomenon, in all operations;
- constant monitoring and control of the implementation of prevention and protection measures;
- recording, monitoring and preventing near misses, accidents and occupational diseases;
- ensuring that innovations and changes in work processes always pursue health and safety objectives for workers;
- timely adaptation to all relevant regulatory changes and updates;
- integration of health and safety principles in the workplace in the management of all company activities;
- identification of roles and responsibilities within the organisation and allocation of the necessary resources for planning and implementing the programmes aimed at achieving the objectives;

- ensuring effective and transparent communication that ensures the dissemination of all information useful for prevention purposes, including cooperation and coordination measures with contractors;
- compliance with the signed requirements and absolute compliance with the provisions of current legislation on safety at work;
- the development, at all company levels, through training and information, of professional skills aimed at operating in compliance with prevention and protection measures;
- the communication of safety and health information as the cornerstone of the WHSMS;
- consultation and participation of workers also through their representatives;
- the periodic review, to evaluate the correctness and effectiveness of the WHSMS, with a view to continuous improvement and the achievement of the defined objectives.

ENVIRONMENT

Poste Italiane promotes environmental protection throughout its value chain. Poste Italiane undertakes to prevent, manage and, where possible, reduce the environmental impacts generated directly through its operational activities, in particular, from the use of properties and logistics and transport activities, whether carried out directly or through suppliers and partners.

With regard to environmental issues, Poste Italiane undertakes to carry out its activities also through the adoption of an Environmental Management System compliant with ISO 14001:2015 and in particular through the application of the following principles:

- analysis of the context and identification of directions and objectives consistent with the principles of environmental sustainability;
- identification of roles and responsibilities within the organisation and allocation of the necessary resources for planning and implementing the programmes aimed at achieving the environmental objectives;
- growth of a responsible culture through the promotion of information, training and updating activities on environmental matters;
- management of environmental risks, in particular the prevention of pollution and emergency situations, limiting any potential impact on people and the environment;
- constant updating of the environmental risk assessment, rules and procedures for any activity involving environmental risks;
- planning and management of the activities carried out, pursuing rationalisation and minimisation of water and energy consumption and waste production, favouring their recovery where possible;
- ensuring that innovations and changes in work processes always pursue objectives of reducing environmental impact;
- ensuring effective and transparent communication that ensures the dissemination of all information useful for environmental prevention purposes;
- prevention of environmental accidents;
- timely adaptation to all relevant regulatory changes and updates;
- compliance with the signed requirements and absolute compliance with the provisions of current environmental legislation;
- communication of information relevant to compliance with environmental issues as a key element of sharing and soundness of the management system;
- monitoring, through a system of indicators, its environmental performance;
- periodic review to assess the correctness and effectiveness of the management system, with a view to continuous improvement and the achievement of the defined objectives;
- pursuit of continuous improvement of environmental sustainability performance.

PREVENTION OF CORRUPTION

Specifically with regard to the activities carried out for the prevention of corruption, Poste Italiane SpA undertakes to satisfy the requirements of the Anti-bribery Management System according to the ISO 37001:2016 standard and, together with the companies directly or indirectly controlled by it (the latter based on the peculiarities of their business, size and taking into account the applicable regulations), carry out its activities through the following general principles:

- Ensure conduct based on the criteria of fairness, loyalty and moral integrity that prohibits corruption;
- Comply with all anti-bribery laws, rules and regulations;
- Conduct its activities in such a way as not to commit any act of corruption in any form, whether direct or indirect, and not to facilitate or risk involvement in illegal situations, with public or private entities;
- Provide a framework for the identification, review and achievement of anti-bribery objectives;
- Encourage the reporting of suspicions in good faith or on the basis of a reasonable belief, without fear of retaliation and ensuring that no whistleblower is discriminated against with effects on working conditions linked to the reporting;
- Prosecute any conduct that does not comply with the policy for the prevention of corruption through the application of the company disciplinary system;
- Encourage every possible effort to prevent corruption by third parties connected to them, including joint ventures and entities upstream and downstream of the supply chain (e.g. agents, intermediaries, vendors, contractors, suppliers);
- Ensure that the “Anti-Bribery Compliance Function” has the appropriate expertise, status, authority and independence to carry out its role of overseeing the design and implementation of the system, advising staff on anti-bribery matters, ensuring compliance with ISO 37001:2016 and reporting to Senior Management on the performance of the system;

In addition, Poste Italiane S.p.A. and its subsidiaries (hereinafter Poste Italiane) must comply with the provisions of the Code of Ethics, the procedures and protocols defined for compliance with the regulatory framework of reference on anti-bribery, as well as specific principles of conduct defined, including those provided for in the Organization, Management and Control Model pursuant to Legislative Decree 231/2001. In particular, Poste Italiane, in line with the provisions of the Code of Ethics and the Company's Regulatory System, prohibits:

- Accepting the request, authorising someone to receive, or soliciting, directly or indirectly, a payment or an economic advantage, other utility or benefit from public or private parties;
- Offering, promising, giving, paying or authorising someone to give or pay, directly or indirectly, money, other economic advantage, utility or benefit of any kind to public or private persons;
- Receiving or obtaining the promise of money or other benefits, for oneself or others, in order to perform or omit acts in breach of the obligations inherent in their office or obligations of loyalty, including causing damage to the companies themselves;
- Promising or paying sums, goods in kind or other benefits to interest-bearing associations to promote or favour the interests of Poste Italiane.

In addition, for Poste Italiane activities that can be identified as more sensitive to corruption risk, the following specific principles of conduct are identified:

- Relations with public administration
Through its employees and collaborators, Poste Italiane actively cooperates with the Authorities (Supervisory and Judicial) and public institutions (understood in all its possible forms), adopting behaviour characterised by fairness, professionalism, collaboration and transparency. Such relationships are reserved for the competent functions and positions, in accordance with the system of powers of attorney and delegation, as

well as in compliance with the most rigorous observance of the provisions of law and regulations on anti-bribery, and cannot in any way compromise the integrity and reputation of Poste Italiane. In such relationships the Group shall not seek to improperly influence the decisions of the public institution concerned.

- Gifts, presents or other advantages of any kind

Acts of commercial courtesy, such as gifts or forms of hospitality, are allowed only if of modest value, such as not to compromise the integrity or reputation of one of the parties, in line with any limits provided by the counterparties concerned and with anti-bribery legislation and must not be interpreted, by an impartial observer, as aimed at improperly acquiring advantages.

It is forbidden to accept money from persons or companies that have or intend to enter into business relations with Poste Italiane. Anyone who is offered gifts or preferential treatment or hospitality that cannot be considered as a business courtesy of modest value, or who requests such courtesies from third parties, must decline them and immediately inform their manager or the organisation to which they belong.

Furthermore, it is forbidden to receive and distribute gifts and presents or grant other advantages of any kind to representatives of the Public Administration or third parties that exceed normal commercial or courtesy practices, or in any case aimed at acquiring preferential treatment in the conduct of any business activity.

- Facilitation payments

All facilitation payments, or any form of payment or bestowal of other benefits, including those of a minimum amount, but with a corruptive intent, are prohibited. Poste Italiane does not make facilitation payments, nor does it tolerate any of its employees or third parties, in the context of their relationships with the Group, offering, promising, soliciting, requesting, granting or accepting any type of facilitation payment, from or to any third party.

- Relations with political and trade union associations and organisations

Relations with associations, political and labour union organisations are guided by the principles of fairness, impartiality and independence and are reserved for the competent corporate functions. Poste Italiane does not make contributions of any kind, directly or indirectly, to political parties, movements, committees and political and trade union organisations, nor to their representatives or candidates, both in Italy and abroad, without prejudice to what is established and permitted by the applicable regulations.

In relations with interest-bearing associations, Poste Italiane may not promise or pay sums or goods in kind or other benefits to promote or favour the interests of Poste Italiane.

- Relations with suppliers and partners

The choice of suppliers and partners is made in accordance with the criteria of transparency, legality, convenience, efficiency and inexpensiveness. Poste Italiane guarantees every supplier equal opportunities and the possibility to compete in awarding procedures, excluding favourable treatment, through specific regulatory and/or organisational tools, including: recourse to the 'direct assignment' procedure only for limited and clearly identified cases, adequately justified and documented, and subject to suitable control systems and authorisation systems at an appropriate hierarchical level; the methods and criteria for the preparation, approval, dissemination and publicity of the call for tenders; a model for evaluating bids (technical/economic) based on transparency and the greatest possible limitation of subjectivity criteria; suitable monitoring systems to ensure a correct and natural rotation of suppliers; standardised contractual forecasts concerning the nature and type of contract, including contractual provisions aimed at ensuring compliance with control principles/ethical rules in the management of activities by third parties, and the activities to be followed in the event of any deviations.

In order to avoid the occurrence of situations that may prefigure episodes of corruption, it is forbidden to maintain relationships, negotiate and/or stipulate and/or execute contracts or acts with persons indicated in the Reference Lists (so-called black list) or belonging to organizations present in the same, to carry out services in favour of consultants, partners and suppliers that do not find adequate justification in the context of the contractual relationship established with them and to recognize compensation in favour of consultants, partners and suppliers that do not find adequate justification in relation to the type of assignment to be carried out.

- **Liberal donations and sponsorships**
Poste Italiane carries out initiatives and projects that benefit the community, and especially categories of people who are undergoing hardship due to their physical, mental, family, economic, ethnic or social conditions. Under no circumstances may contributions in the form of donations and sponsorships be used to conceal acts of corruption. For this reason, before they are granted, a special due diligence process is activated on the relevance of the initiatives, the notoriety of the potential partner, the consistency with business objectives and the expected benefits. Subsequently, the consistency of the supported initiatives with respect to the contractual provisions is periodically evaluated, the regular performance of the activities is verified and the correct execution of the contractual obligations is ascertained, at the expense of the beneficiary.
- **Staff selection and recruitment**
The selection and recruitment of personnel by Poste Italiane are guided by the principles of fairness and impartiality. The resources hired must have profiles that actually meet the company's needs and are chosen exclusively on the basis of professionalism and competence, excluding any form of favouritism. In addition to the prohibition of hiring people listed in the Reference Lists (so-called blacklist) or belonging to organisations present in them, the process of selection and hiring of personnel includes specific measures, such as: searching for a plurality of applicants depending on the complexity of the role to be filled; carrying out pre-employment checks aimed at preventing prejudicial situations; managing conflicts of interest between the recruiter and the candidate; verifying the consistency of the applications with the defined profile; defining any obstructive circumstances as well as those that require attention only when hiring following the completion of pre-employment checks.
- **Major mergers, acquisitions and investments**
In order to avoid risks that the reference entity of a relevant merger, acquisition or investment transaction has been or is still involved in corrupt acts, Poste Italiane has adopted mitigation measures that mainly consist of an ante-operation due diligence to verify that all the risks of possible previous corrupt actions have been identified, in a decision-making process that includes all the necessary anti-bribery assessments and in the transposition of Poste Italiane's anti-bribery policy by the reference entity upon completion of the operation within.

Compliance with the general and specific anti-bribery principles adopted by Poste Italiane must be guaranteed by the presence of a culture of integrity and transparency spread throughout the value chain. For this reason, Poste Italiane invests in training and information activities for its staff. In order to ensure a minimum level of knowledge on anti-bribery by its employees, Poste Italiane organizes a mandatory online and classroom training program for all staff on anti-bribery principles and, in particular, on reporting mechanisms and on any significant changes to the anti-bribery regulations and/or the regulatory system adopted. In addition, Poste Italiane's general and specific anti-bribery principles are communicated to its stakeholders through the Code of Ethics and this Policy.

Violation of the Anti-Bribery Policy and Management System harms the relationship of trust established with Poste Italiane and may lead to the instigation of legal action and the adoption of measures, against Relative Persons, in accordance with the law and contractual arrangements. In this regard, in line with the provisions of the Code of Ethics, Poste Italiane makes available to stakeholders communication channels (so-called whistleblowing) suitable for guaranteeing the reception and management of detailed reports of relevant conduct based on precise and concordant factual elements and the protection of the whistleblower in line with current legislation. The procedures for managing reports of irregularities in corporate management, of acts or facts that may constitute a violation of internal and external regulations, and of the principles and rules of conduct contained in the Code of Ethics and Model 231 of Poste Italiane, including those in the anti-bribery field, are regulated in detail in the Guidelines "Reporting System for Violations (Whistleblowing)". The Ethics Committee is responsible for receiving and handling such reports.

With regard to the roles and responsibilities for the management of this Policy, it is established that the Poste Italiane functions play an active role in enforcing the principles of conduct described in this Policy and have the responsibility to create and disseminate the culture of risk management within the organization and to ensure the supervision of the required conduct. Poste Italiane SpA appoints a Function responsible for anti-bribery ("Corruption Prevention Compliance Function") and the controlled companies, in consideration of their size and/or organizational and operational context, as well as specific applicable regulations, may similarly appoint a Corruption Prevention Compliance Function, competent for their own perimeter, as well as a contact person, who operates in coordination with the Poste Italiane SpA function dedicated to the monitoring of the Anti-bribery Management System.

INFORMATION SECURITY

In the specific field of Information Security issues, Poste Italiane also undertakes to carry out its activities in accordance with the ISO/IEC 27001:2022 standard (with extension to ISO/IEC 27017:2015 and ISO/IEC 27018:2019) and in compliance with best practices and the most advanced principles of cyber-security, through the following principles:

- Implement the management of the security of information, held and processed, by means of IT tools, as well as the IT resources and processes necessary for their processing, in order to contain within predefined acceptable limits the risk of compromising the confidentiality, integrity and availability of the same, with a view to protecting the business and contributing to the fight against cybercrime events.
- Extend the aforementioned principles for the management of Cloud Computing services both directly and through specialized providers.
- Develop, maintain and improve the internal regulatory framework aimed at all employees and counterparties of the Group;
- Prepare all necessary actions to pursue security objectives congruent with the degree of sensitivity of company information and the criticality of the technologies that enable its processing, guaranteeing:
 - protection of confidentiality must be implemented by means of appropriate measures to prevent the occurrence of unauthorised access to IT resources and data stored, processed or transmitted by means of the use of IT resources or the uncontrolled dissemination of such data;
 - integrity protection must be implemented through suitable interventions to counteract the occurrence of unauthorised modifications or damage to the physical format and/or semantic content of the data stored, processed and transmitted through the use of IT resources;
 - protection of availability must be implemented through suitable interventions to guarantee authorised persons access to resources in time to complete their mission.
- Systematically carry out analysis and management of risks impacting information security, in accordance with company policies and models, to identify the necessary controls to be adopted, also in reference to the continuous evolution of the external framework of cyber threats;
- Monitor at company level the state of security of information and ICT systems and the level of compliance with the internal regulatory framework and any legal constraints;
- Prevent and manage information security events and/or incidents, collecting and storing related records, including for judicial purposes and improvement programs;
- Promote and implement targeted or widespread training and awareness plans on information security;
- Safeguard company data and IT resources from the moment of their creation/introduction into the company, during their use, until their destruction/disposal;
- Protect IT resources in relation to accidental and/or intentional events of destruction, loss, disclosure, alteration and unauthorised access.

Responsibility and compliance with the principles of information security are the responsibility of each user of IT resources and company data, or the employee at any level, as well as third parties who, for any reason, carry out, even temporarily, work activities for the Group Companies (suppliers, consultants, partners). This responsibility

derives from the principles of diligence and fairness, which must guide behaviour in the performance of work activities.

INFORMATION SYSTEMS MANAGEMENT

In the specific field of information systems management issues, Poste Italiane S.p.A. also undertakes to carry out its activities according to the ISO/IEC 20000-1:2018 standard, through the following principles:

- Develop, maintain and improve the technological infrastructure to support business processes, in line with the multi-year business plan, including through the adoption of cloud paradigms and technologies and a risk-based approach to project management;
- Ensure the availability of information systems in relation to the service levels defined with internal and external counterparties;
- Ensure over time the compliance of the Information Systems with company security standards and the reference legislation by implementing the corrective plans defined during the monitoring of the systems.

TRANSPPOSITION, UPDATING AND DISCLOSURE PROCEDURES

In general, with reference to the general and specific principles contained in this document, it should be noted that the subsidiaries, within their autonomy and independence, adopt the Policy in question, adapting it to their size and organisational and operational context, as well as to specific applicable regulations (for example, in the financial and insurance sectors).

The Policy is evaluated at least once a year during the Management Systems Review, based on the results achieved and its actual implementation; in case of change, it is submitted to the approval of the Board of Directors and disseminated to all staff.

This Policy is available to all interested parties through publication on the company website. The commitments contained in the Policy are commensurate with the available human and financial resources and are the reference for defining the objectives for performance improvement.

