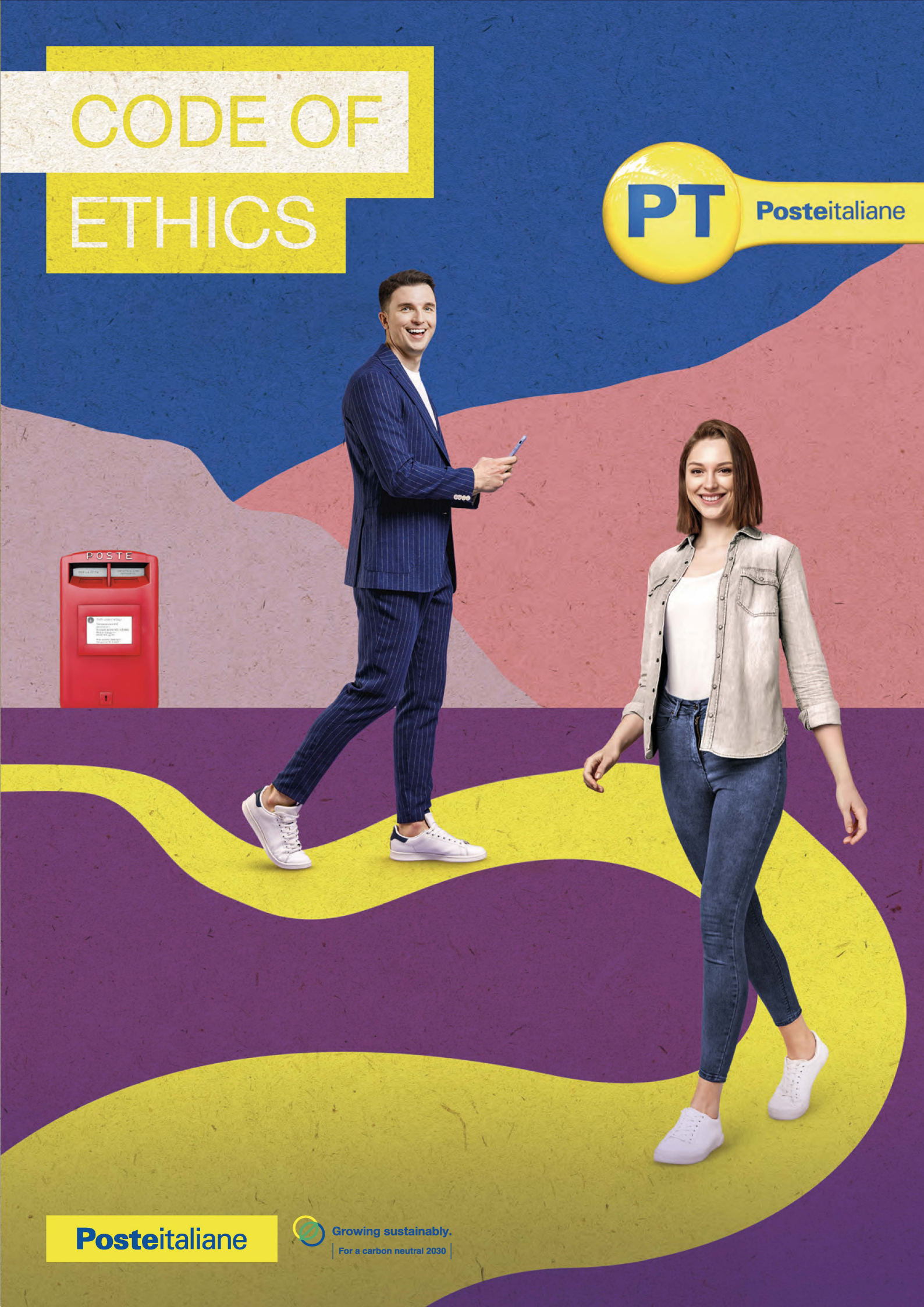
GROUP CODE OF ETHICS

RECEIVED AND APPROVED BY THE BOARD OF DIRECTORS ON 15/11/2023

AGILE LAB SRL – GRUPPO POSTE ITALIANE
Sede Legale in Via Alessandro Manzoni 30, 20121, Milano
Registro delle Imprese di Milano, C.F./P.I. 10963790018
Iscrizione al REA n. 2020192

CODE OF ETHICS

Posteitaliane



Posteitaliane

Growing sustainably.
For a carbon neutral 2030

THE VALUES THAT ADD VALUE

“Our commitment to sustainability can also be seen in the pages of this document, printed on **paper** made from **100% recycled fibres**, to express once again, not just in words, our concern for the environment.”

“We consider it essential to clearly define the values and social role through which we are able to contribute to the processes of **cohesion**, **inclusion** and overall **sustainability** of the areas and within the communities in which we operate.”

CONTENTS

Leadership Letter 5

Poste Italiane: a point of reference for families and businesses 6

Who it applies to and when it applies 8

Guiding principles 10

Poste and its People 18

Relationships with suppliers and partners 26

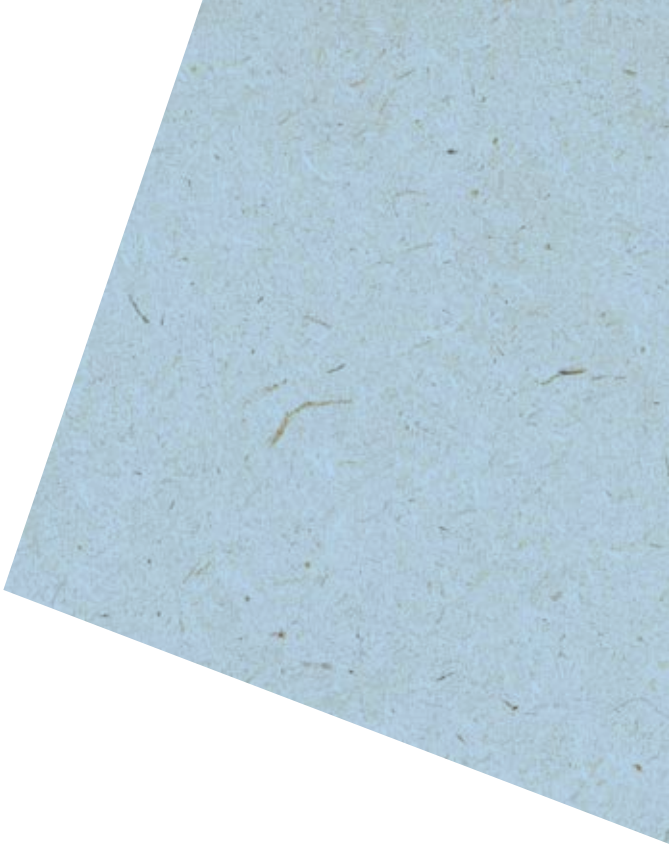
Poste and its customers 32

Communicating with investors and the market 36

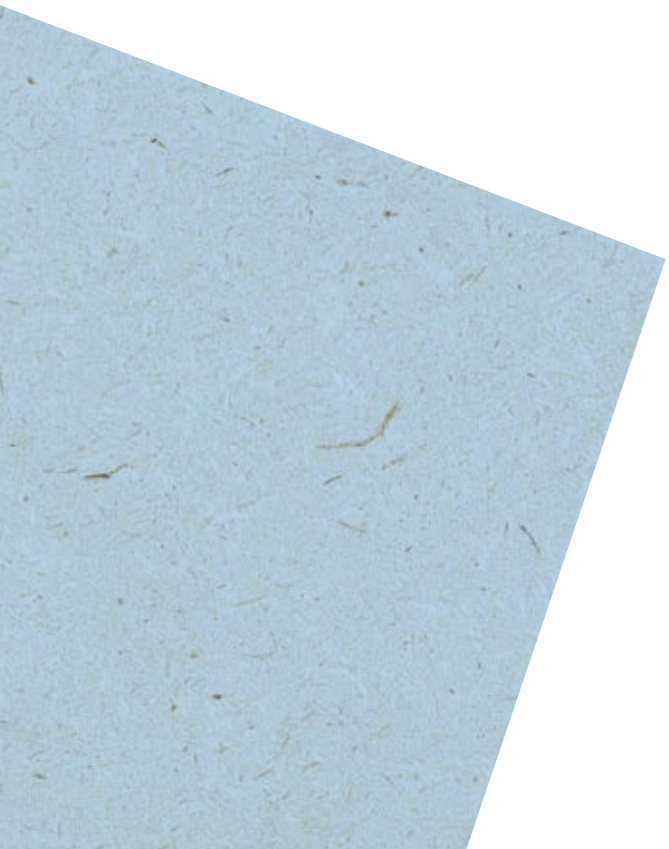
Dialogue with the community and other external individuals 40

Our relationship with the public administration and authorities 44

Implementation, dissemination and monitoring procedures 48



“**Sustainable success**, **ethics** and **transparency** are the most important and recognisable values of the company’s identity. They are the fundamental principles that guide Poste Italiane’s way of conducting business, based on **trust** and **transparent relationships with all its stakeholders**.”



LEADERSHIP LETTER

“OUR COMMITMENT TO RESPONSIBLE GROWTH.”

For over 160 years, we have been a unique company in Italy, recognised for its history, size and widespread presence, always supporting citizens even in the most difficult times.

Thanks to the contribution and constant commitment of our people, we have guided the country on its path of modernisation and development, aware that we play a primary and active role in the socio-economic environment for the well-being of the community and the people who work or collaborate with us.

By offering cutting-edge technological solutions accessible to all citizens, we are helping Italy on its path of innovation and digitisation and contributing to the cohesion, inclusion and sustainability of the territory and its communities.

We therefore want to stay on the path already chosen, continuing to share our values and our social role with clarity.

The Code of Ethics defines the principles that characterise our identity and represents a guide for all the individuals to whom it is addressed, through rules of conduct that are of paramount importance to ensure reliability and strengthen our reputation.

We trust that all our stakeholders identify with these principles and are personally committed to placing them at the centre of their actions, constantly strengthening the bond of mutual trust.

Operating according to these principles is the key to achieving the sustainable success for which we work every day with commitment and dedication.

Sincerely,

Giuseppe Lasco
Co-General Manager



POSTE ITALIANE: A POINT OF REFERENCE FOR FAMILIES AND BUSINESSES

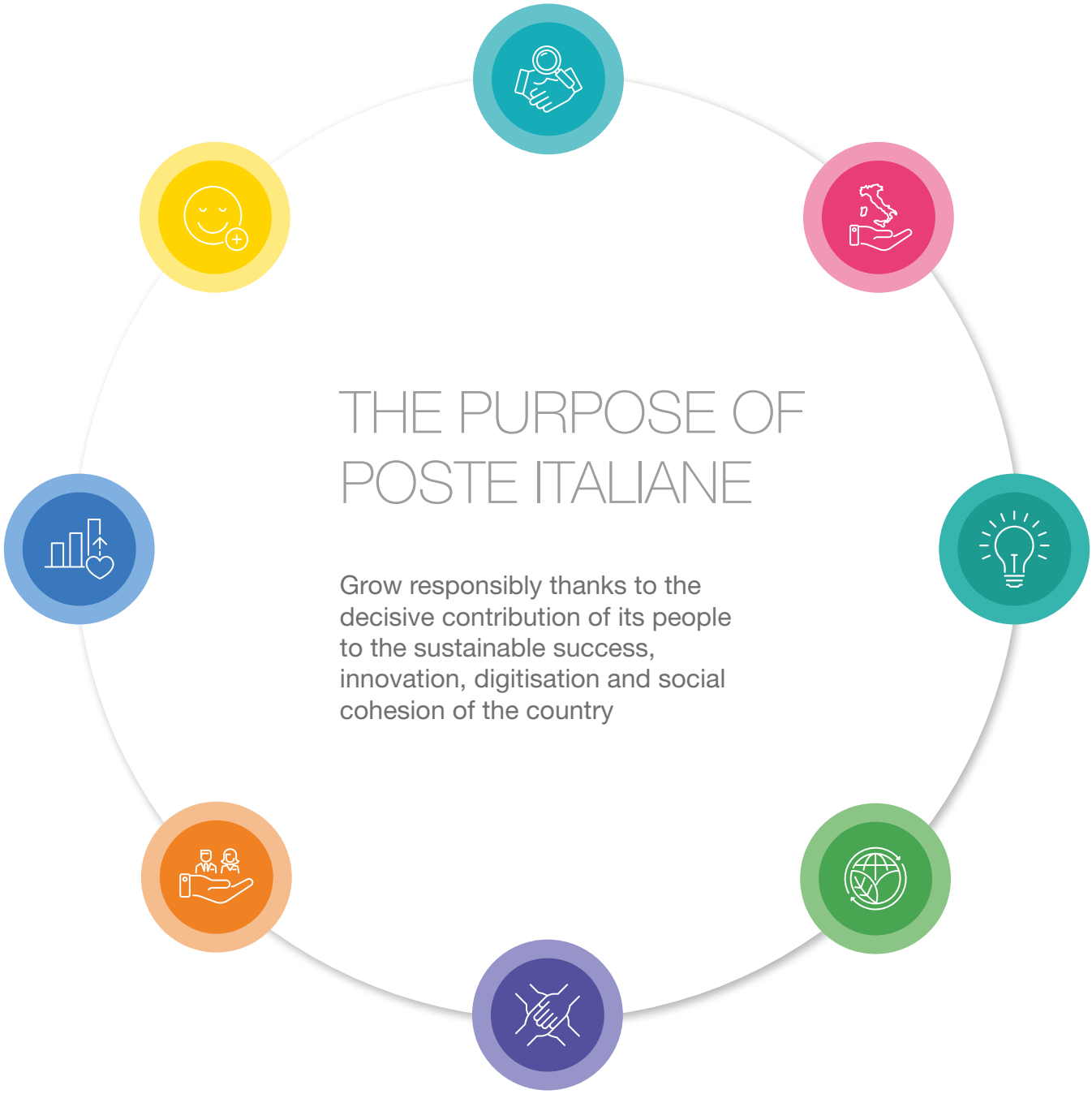
We are the largest Italian company in the service, mail and logistics sector as well as one of the most important players in financial and insurance services, also the top employer in the country.

We are a unique reality in terms of our history, size, widespread presence in the territory, recognizability and the trust we have earned from citizens. We are a point of reference for families and businesses and a natural partner of the Public Administration in the development of services for citizen. While evolving and innovating, we have remained steadfast in upholding our values.

We are an integral part of the economic, social and productive system of the country. Our activities generate significant impacts throughout the territory, also with a view to achieving the Sustainable Development Goals (SDGs) defined by the United Nations 2030 Agenda, guiding our decisions and our development in line with these goals.

Given the size and importance of our activities, we are aware that we play a primary and relevant role in the market, economic development and the well-being of the community and the people who work or collaborate with us. Therefore, we consider it essential to clearly define the values and social role that enable us to contribute to the processes of cohesion, inclusion and overall sustainability of the territory and the communities in which we operate.

To this end, we have drawn up the Code of Ethics, whose compliance is of paramount importance to ensure the efficiency, reliability and the consolidation of our reputation.



THE PURPOSE OF POSTE ITALIANE

Grow responsibly thanks to the decisive contribution of its people to the sustainable success, innovation, digitisation and social cohesion of the country

WHO IT APPLIES TO AND WHEN IT APPLIES

The Code of Ethics is addressed to directors, supervisory bodies, management and all employees, as well as to those who work - either directly or indirectly, permanently or temporarily - to pursue the objectives of Poste Italiane[1] (hereinafter “Recipients”).

The Code defines the inspiring principles and the rules of conduct that the Recipients must observe in the performance of their professional activities and in the management of relations with our shareholders, colleagues, customers, suppliers, partners, as well as with public institutions, political and trade union organisations and all other stakeholders with whom we have relations. In addition, the Code of Ethics, together with Model 231, integrates the overall system of prevention of offences under Legislative Decree No. 231/2001 and represents a reference for all specific policies and regulatory instruments governing activities potentially exposed to the risk of offences.

We trust that our stakeholders shall recognise the principles on which the Code of Ethics is based, share them and apply them as a basis for a relationship of mutual trust.

1 Poste Italiane” refers to Poste Italiane S.p.A. and its subsidiaries (including Consortia).

“The **Code of Ethics**: the foundation for a relationship based on mutual trust.”

GUIDING PRINCIPLES





GUIDING PRINCIPLES

We implement and promote a set of fundamental principles — set out below — that inspire the culture, behaviour and way of doing business of Recipients.

All Recipients, within the scope of their role and the specific responsibilities assigned to them, are called upon to act in compliance with the principles and contents of the Code of Ethics.



"We promote integrity, legality, honesty, fairness and fair competition between parties."

Integrity is one of the founding values of our identity and supports us in managing a responsible business. We promote compliance with all laws, applicable regulations, including those of the Supervisory Authorities, statutory provisions, the Code of Corporate Governance and the Code of Ethics, as an indispensable condition for any action, transaction and negotiation. To this end, we adopt appropriate risk management systems and compliance programmes at all company levels and in all areas in which we operate.

We do not allow any behaviour in violation of the regulations in force, not even if it is carried out in the interests of Poste Italiane. On the contrary, we promote integrity, honesty, fairness and fair competition between parties in achieving challenging objectives and new goals, committing ourselves to always respect every stakeholder, including competitors.

We develop relationships with our suppliers and partners based on fairness, integrity and transparency, promoting constant dialogue and sharing with them the principles of our Code of Ethics.



"We operate according to impartiality and do not allow any discrimination."

We promote and support an inclusive corporate culture free from discrimination and prejudice, based on respect for diversity in all its forms and manifestations, at all levels of the organisation, as a resource of fundamental impact in the creation of corporate value.

We ensure respect for equal opportunities and work according to a proactive strategy to overcome any cultural stereotypes and to identify and address factors that may threaten labour inclusion.

We are committed to favor social cohesion and equity while promoting sustainable growth. In conducting our business and in our relations with our stakeholders, we act impartially and do not allow any direct or indirect discrimination based on age, gender, sexual orientation or gender identity, disability, health status, ethnic origin, nationality, political opinions or religious beliefs.



"We actively work to support the needs of the socio-economic context and the community."

We are constantly dedicated to the community in which we operate, supporting modernisation processes and promoting the well-being of citizens and the socio-economic development of the area to generate a positive impact on the community.



"We recognise the contribution of each individual as well as of teamwork."

We pay the utmost attention to human capital as a key element in creating competitive advantage and achieving business goals. We protect the value of our People[2] and promote respect for the psychophysical, moral and cultural integrity of our employees and collaborators through working conditions that respect individual dignity and behavioural rules and through safe and healthy working environments. We work to prevent all forms of intimidation, bullying or stalking in the work environment and to prevent insulting or defamatory interpersonal attitudes.

We seek the satisfaction of our People by supporting initiatives aimed at achieving a working environment inspired by motivation and involvement, fostering the acquisition of new skills and capable of measuring, recognising and rewarding the contribution of each individual and of teamwork.



"We promote transparent communication at all levels."

We believe that the correctness, completeness and transparency of information are an essential value in enabling our stakeholders to make autonomous and informed decisions and in ensuring that dialogue with them takes place in a direct and honest manner.

We promote transparent, clear and comprehensive communication at all levels, adopting forms and content that are verifiably truthful and immediately comprehensible to the various stakeholders.

2 Members of the management and control bodies and employees of the Poste Italiane Group.



"We also promote sustainable success through responsible investment."

We sustainably promote the social and economic development of the entire country system and pursue sustainable success by applying the principles of sustainability in all areas in which we operate.

We are convinced that, through effective investment processes and by integrating sustainability criteria into investment and insurance activities as well, the asset management and insurance sectors can help protect society, promote innovation and support economic growth.



"We identify innovation and digitisation as key elements of strategic progress, necessary to offer state-of-the-art technology solutions."

We believe that innovation and digitisation are two fundamentally important factors for strategic progress. We position ourselves as a major player on the path of innovation and digitisation for the country, ensuring the accessibility and functionality of our offer to all citizens and promoting a greater connection with the business fabric and the Public Administration.

We develop transparent and controlled IT solutions, capable of improving individual and collective well-being, as well as fostering progress and innovation, while ensuring respect for fundamental rights and the principles of legality, inclusiveness, ethicality and robustness.

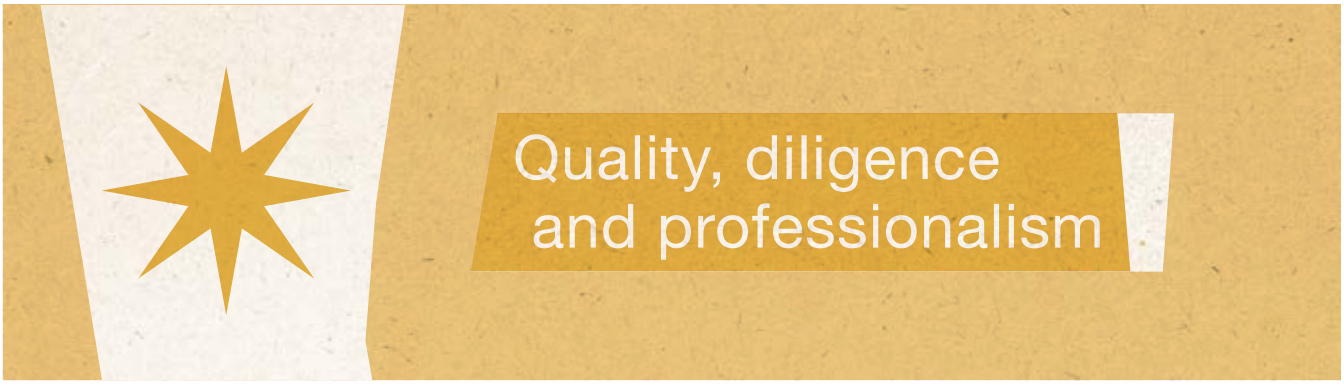


Environmental protection

"We encourage environmental protection through a conscious management of energy, water and waste."

We believe that environmental protection is an indispensable pillar to create sustainable value.

We operate and act sustainably, minimising environmental impacts and using resources responsibly, creating value for our stakeholders and the community. To this end, we take and encourage a cultural approach to environmental protection, with conscious behaviour regarding energy, water and waste management and through innovative solutions to reduce negative environmental impacts.



Quality, diligence and professionalism

"We devote our best efforts to constant improvement."

We set customer satisfaction as the main objective of our quality policies, listening to customers to ensure that we fully understand their needs and striving to constantly improve the products and services we offer.

We base the performance of each activity on the utmost commitment and professional diligence, in the mutual awareness that the surest safeguard of the company's reputation consists in relying on professionals suitable to perform the functions and responsibilities assigned.



“We ensure the necessary confidentiality in handling information.”

We undertake to ensure the necessary confidentiality in handling the information we have at our disposal, refraining from communicating confidential data, except with the express authorisation of the persons concerned and/or in accordance with the regulations in force. We protect confidential information and data (acquired in connection with our business and the services provided to customers) from any use for purposes not related to work or for unauthorised personal purposes/advantages.

POSTE AND ITS PEOPLE

Respecting and valuing people. impartiality and fairness



POSTE AND ITS PEOPLE

Protection of rights and dignity

"We promote the protection of human rights for all people working within our value chain."

We uphold and disseminate respect for human rights at all levels and throughout our entire value chain, in the interest of both our People and of those belonging to the community in which we operate, as an indispensable prerequisite for building societies based on the principles of equality, solidarity and the protection of civil, political, social, economic and cultural rights and so-called third-generation rights (the right to self-determination, peace, development and a healthy environment).

Furthermore, we actively observe and promote the recognition and safeguarding of the dignity, freedom and equality of human beings through the adoption of corporate, organisational and management mechanisms that respect the rights and freedom of persons.

We prevent and reject all forms of violence, such as forced or child labour and human trafficking, by promoting freedom of association, the right to collective bargaining and fair pay, in order to support the well-being of the individual.

Staff welfare and development

"We promote loyalty, fairness and respect in the relationships between our People."

We promote loyalty, fairness and respect in the relationships between our People, irrespective of their levels of responsibility, without prejudice to the different roles and functions in the company.

We select people on the basis of their professionalism and competence in relation to business needs and guarantee equal opportunities, avoiding any form of discrimination or favouritism.

We are committed to taking care of our People by fostering their personal and professional development, with initiatives that enhance their skills and competences. We guarantee equal opportunities for training and professional growth, in line with merit and performance criteria, by implementing specific training initiatives aimed at the professional and cultural growth of the people involved in our activities.

We value work-life balance as a source of well-being for our People.

Diversity and Inclusion

"We operate with impartiality and do not allow any form of direct or indirect discrimination."

We protect and encourage diversity with concrete and pervasive actions in all organisational and management processes, based on the respect and value of people, so that everyone can feel included and give their best.

We are committed to ensuring a working environment free of all forms of discrimination, reflecting the values of inclusion and pluralism and recognising equal opportunities for all people, promoting inclusion and protecting diversity. All of this in the conviction that cooperation among individuals from different cultures, perspectives and experiences is a key element in the mutual acquisition and exchange of new skills and for rewarding each individual's contribution.

Occupational Health and Safety

"We promote the psychological and physical well-being of people through policies, prevention programmes and information and awareness campaigns."

Living and working in a safe and secure environment is a prerequisite for the well-being and satisfaction of every person. To this end, we promote a corporate culture that guarantees healthy and hygienic working conditions, promoting the psychophysical well-being of people through prevention policies and programmes and information and awareness campaigns.

We strive to prevent occupational injuries and illnesses through the implementation, proper application and maintenance of occupational safety management systems that comply with international requirements and standards, national laws, regulations and policies.

We require Recipients to refrain from actions that endanger their own health and safety and that of third parties in the performance of their daily activities.

Protection of corporate assets

"We use and manage company assets and tools with integrity, fairness and responsibility."

Company assets and tools are a fundamental value to foster innovation and excellence in products and services. It is important to use them properly and consistently with the company's objectives so that their improper use does not generate inefficiency, damage or harm to Poste Italiane, our stakeholders or the environment.

To this end, we hold each Recipient responsible for the protection and preservation of the company assets and tools - both tangible and intangible - entrusted to them to perform their duties, as well as for their use in a manner consistent with company policies. In particular, we prohibit any improper use of the company's assets and tools that may cause damage or reduce efficiency or be contrary to the interests of Poste Italiane.

We require Recipients to refrain from any use of company computer systems or social networks that may constitute a violation of applicable laws, an offence against the freedom, integrity and dignity of persons, or that may lead to undue intrusion into or damage to the computer systems of others, also in accordance with the company's security policies.

We also make every effort to promote a cybersecurity culture within the company and in the social context.

Healthy working environment

"We promote a healthy working environment and deem any act or behaviour that constitutes harassment or violence in the workplace unacceptable."

We promote the organisational well-being of our People in its various aspects, supporting an environment where interpersonal relations are characterised by fairness, equality and mutual respect for personal freedom and dignity. In particular, we are committed to establishing measures to protect the physical and moral integrity of our People, combating practices that violate their dignity such as violence, bullying and harassment, including of a psychological nature.

To this end, all Recipients personally contribute to building and maintaining a climate of mutual respect, showing attention to colleagues and to each other's sensitivities, in an atmosphere of cooperation and help.

Furthermore, in order to consolidate a climate of mutual respect and responsibility, we establish for all Recipients the prohibition of:

- consuming, offering, distributing or transferring for any reason alcoholic substances, narcotics or substances with similar effect during work and/or in the workplace;
- smoking in the workplace, except in any restricted areas.

Gifts, presents or other benefit

"We act on the basis of the principles of honesty, transparency and integrity."

Acts of commercial courtesy such as free gifts, presents or other benefits are only permitted if they are of modest value, do not compromise the integrity or reputation of one of the parties, are consistent with any limits set by the counterparts concerned and, in any case, when they cannot be interpreted, by an impartial observer, as aimed at acquiring advantages in an improper manner.

We prohibit the acceptance of money from persons or companies that are or intend to enter into business relations with Poste Italiane. Anyone who receives proposals for gifts or favourable treatment or hospitality that do not qualify as acts of commercial courtesy of a modest value, or a request for such from a third party, shall reject them and immediately inform their manager or the body to which they belong.

Conflict of interest

"We ensure compliance with provisions on conflict of interest."

We require directors, supervisory bodies, management and all employees not to take decisions and not to carry out activities (even in the performance of their duties) in conflict — even if only potentially — with the interests of Poste Italiane and its customers or otherwise in conflict with their official duties.

By way of non-limiting example, the following situations may give rise to conflicts of interest:

- being in a top management position (e.g. Managing Director, Director, Head of Function) and having economic interests in common with suppliers, customers or competitors (ownership of shares, professional appointments, etc.), including through family members;
- maintaining relations with suppliers and carrying out work, including by a family member, with suppliers;
- entering into transactions with related parties and connected persons (e.g. transfer of resources, services or obligations);

- carrying out personal transactions, including through intermediaries, in financial instruments in which the Recipients may have a conflicting interest, using confidential information at their disposal by virtue of their functions, in accordance with the provisions of the laws in force. Similarly, Recipients shall refrain from accepting proxies or mandates for the purpose of entering into contracts or carrying out transactions in BancoPosta's business on behalf of investors[3].

The above-mentioned persons shall comply with the company's provisions on the reporting and management of conflicts of interest.

In case of doubt as to the conduct to be adopted, the persons referred to above shall inform their facility manager of the situation constituting a potential conflict of interest if an employee, or their company contact person if a different person.

3 Excluding spouses or cohabiting partners and relatives or relatives-in-law up to the fourth degree.

“The Code of Ethics constitutes the set of **values**, **principles** and **commitments** that Poste Italiane has **towards its people and towards its many external stakeholders**, regulating the way we work and collaborate together.”

RELATIONSHIPS WITH SUPPLIERS AND PARTNERS

Integrity and legality



RELATIONSHIPS WITH SUPPLIERS AND PARTNERS

Equal opportunities and fairness

"We base our relationships with our suppliers and partners on competence, professionalism, transparency, fairness and impartiality."

We manage relations with our suppliers and partners in accordance with the criteria of impartiality, cost effectiveness, transparency, fairness.

We select suppliers and partners according to the criteria of transparency, lawfulness, expediency, efficiency and cost effectiveness. We guarantee every supplier equal opportunities and the chance to compete in procurement procedures, excluding preferential treatment.

We look for professionalism and commitment in our suppliers and partners to share our values and principles. We expect our suppliers and partners to operate in line with our high standards of compliance with sustainability issues.

In addition, our suppliers and partners participating in procurement procedures are bound to comply with laws on competition, both EU and national, and refrain from anti-competitive or otherwise unethical conduct that is contrary to the rules protecting competition.

With this in mind, we promote the adoption of ethical standards of conduct by our suppliers, including by encouraging the attainment of certifications such as, but not limited to, quality (ISO 9001), anti-corruption (ISO 37001), environmental (ISO 14001), social (SA 8000), and worker health and safety (ISO 45001).

Conflict of interest

"We require our suppliers and partners to comply with provisions on conflict of interest."

We manage relations with our suppliers and partners avoiding situations that may generate personal gain or conflicts of interest.

We require our suppliers and partners to refrain, in their relations with Poste Italiane, from engaging in activities, albeit occasional, that may conflict with the interests of Poste Italiane, or that may interfere with their ability to make decisions consistent with the company's objectives.

In this sense, suppliers and partners in a situation of direct or indirect conflict of interest (even if only apparent and even if related to parent companies and/or subsidiaries) must formally declare it before interacting with Poste Italiane or as soon as they become aware of it or during a procurement procedure or the performance of a contract to allow management to make informed choices in compliance with our ethical principles.

Anti-corruption

"We actively contribute to preventing and combating all acts of corruption."

We actively work to prevent and counter all acts of corruption. Therefore, giving, offering, promising, receiving, accepting, requesting or soliciting money or other benefits to obtain or retain an undue advantage in the performance of work activities, as well as accepting or disbursing any type of consideration that could be considered as a bribe, for any part of contract payments or facilitated payment practices, is not permitted, regardless of the actual undue advantage that may have been obtained.

Violation of the rules of conduct to prevent and counteract corruption by our suppliers and partners may damage the relationship of trust and may lead to legal action and taking measures, in accordance with legal provisions and contractual regimes.

Anti-money laundering and Anti-terrorism

"We counter all forms of money laundering and terrorist financing."

We are constantly striving to combat all forms of money laundering and terrorist financing by applying, where deemed appropriate, the restrictions defined for business activities involving certain countries, organisations, individuals, companies or assets.

We require all Recipients to observe the anti-money laundering and anti-terrorist financing guidelines defined to minimise the risk for Poste Italiane, its employees and the country system.

To this end, we operate in accordance with the principle of maximum transparency in commercial and financial transactions, ensuring the traceability of transactions and implementing appropriate controls to prevent and counter the phenomenon of money laundering and the re-utilisation of illicit proceeds, and we conduct preventive analyses on the available information of potential counterparties in order to verify their reliability and honourableness.

“We invite our stakeholders to share our values, as the basis of an increasingly solid **relationship of trust**, made up of **common ideals and goals**.”

POSTE AND ITS CUSTOMERS

Quality, diligence
and professionalism



POSTE AND ITS CUSTOMERS

Privacy protection

"We guarantee the protection of personal data and maximum information security."

We respect the right to privacy and the protection of the personal data and information of everyone involved in our activities, with special attention to customers and in full compliance with applicable regulations.

We are committed to guaranteeing the protection of information relating to all Recipients and third parties (generated or acquired internally and in business relations) and to preventing any improper use thereof through the systematic adoption of appropriate and preventive security measures for all databases that collect and store personal data.

We know that personal information must be protected, which is why our People and our collaborators, within the scope of their duties, only acquire and process data that is necessary and appropriate to perform their activities and always in line with the defined security standards and rules. We are committed to ensuring the proper functioning of IT security systems, prohibiting access to them by unauthorised persons.

Quality, transparency and fairness towards customers

"We set customer satisfaction as the main objective of our quality policies and safeguard the rights and interests of those who benefit from our goods and services."

We base our relations with our customers on the pursuit of the utmost transparency and fairness and constantly strive to meet their expectations.

We take care of customers with competence, professionalism, courtesy, transparency, fairness and impartiality, aware of the need to meet their expectations and consolidate their trust in Poste Italiane. In particular, we are fully committed to constantly improving the quality of the products and services we offer and provide comprehensive and accurate information, so as to enable customers to make informed choices, respecting our commitments and avoiding the creation of improper expectations.

We make sure that all commercial initiatives, aimed at promoting the company's business and encouraging the purchase of products and services offered to the public, are carried out in compliance with the rules protecting consumer rights.

The excellence of the products and services offered, the willingness to guarantee an immediate and qualified response to requests, and the utmost transparency and fairness constitute the distinguishing and distinctive elements of the relationship with our customers.

COMMUNICATING WITH INVESTORS AND THE MARKET

Confidentiality, transparency and completeness





COMMUNICATING WITH INVESTORS AND THE MARKET

Value for investors, efficiency and transparency

> **"We pursue the goal of long-lasting and sustainable value creation for the benefit not only of shareholders, but also in consideration of the interests of other stakeholders relevant to the company."**

As part of our efforts to maximise value for investors and our other relevant stakeholders, we ensure the proper exercise of authority and transparency in management operations. We define, implement and progressively adapt an articulated and homogeneous system of rules concerning our organisational structure and relations with our shareholders, in accordance with the most advanced Corporate Governance standards.

We provide clear and comprehensive information so that the decisions of our investors and of other relevant stakeholders can be based on knowledge and understanding of corporate strategies, corporate events, management trends and the expected return on investment.

We are constantly striving to ensure the transparent, timely, complete and symmetrical disclosure of information — which may materially influence the price of the financial instruments issued — to our investors, analysts and the market, including via the company website, in compliance with the regulations applicable to listed companies.

To safeguard this objective and the reputational standards on transparency, exhaustiveness, truthfulness and comprehension of communications with investors and other external stakeholders, relations with the media are reserved for the relevant corporate functions, which exercise them consistently with corporate strategies and ethical principles.

Privileged information

"We ensure the proper handling of corporate information and of inside information in particular."

We prohibit the dissemination and improper use of privileged information and guarantee the utmost confidentiality and privacy, also in order to prevent the disclosure of documents and information concerning Poste Italiane from being selective, incomplete or inappropriate.

We require all Recipients, within the scope of their assigned duties, to ensure the proper handling of inside information as well as the knowledge of and compliance with the company's regulations on market abuse.

Competition

"We oppose any form of illegitimate restriction of competitive confrontation."

Respect for the principles of protection of competition is a primary value and an integral part of the corporate culture to ensure ethical conduct of business and relations with all our stakeholders.

Therefore, we do not tolerate any anti-competitive practices and conduct our business relations and activities in a transparent, honest and fair manner and in full compliance with the rules to protect the proper functioning of the market.

DIALOGUE WITH THE COMMUNITY AND OTHER EXTERNAL INDIVIDUALS

Sustainable growth and environmental protection



DIALOGUE WITH THE COMMUNITY AND OTHER EXTERNAL INDIVIDUALS

Protection of health, safety and the environment

"We promote policies to protect health and safety, the environment and public safety."

We conduct our activities in accordance with international agreements, standards, laws, regulations and policies relating to the protection of health and safety, the environment and public safety.

By adopting a conscious approach to the use of energy, water and waste management, we aim to generate a positive impact for the community in which we operate. In particular, within our facilities we promote a rational use of resources and attention to the search for innovative solutions, also to ensure energy saving in order to protect the environment.

Within the scope of our respective tasks, we are all called upon to actively participate in the process of risk prevention, environmental protection and public safety, health and safety protection, also regarding colleagues and third parties. In addition, we promote a better use of natural resources in accordance with the aforementioned principles of ethics and social responsibility.

Relations with Associations and Political and Trade Union Organisations

"We ensure relations with political and trade union associations and organisations that comply with the principles of integrity and transparency."

Relations with associations, political organisations and trade unions are inspired by the principles of fairness, impartiality and independence and are reserved to the competent corporate functions.

Without prejudice to the trade union prerogatives provided for by the laws and contractual regulations in force, we are aware that any involvement in political activities takes place on a personal basis, in one's own time, at one's own expense and in compliance with the relevant regulations; each Recipient must therefore make it clear that any political opinions expressed to third parties are strictly personal and do not, therefore, represent the opinion and orientation of Poste Italiane.

When dealing with interest-bearing associations (e.g. trade associations, environmental organisations), we do not promise or pay sums or goods in kind or other benefits to promote or favour the interests of Poste Italiane.

Community Support

"We take an active role in supporting the needs of the socio-economic context and the community."

It is a commitment inherent to our identity and mission to take an active role in supporting the needs of the socio-economic environment in which we operate and the community we serve.

Thanks to our capillary presence throughout Italy, we promote proximity to the communities in which we operate in an organic and widespread manner, guaranteeing products and services that are accessible to all as well as activity programmes related to issues of social inclusion.

Similarly, we contribute to the development of the community through typical business activities and through proximity actions not directly aimed at creating economic value for Poste Italiane, but aimed at satisfying specific and documented needs of the community, including through sponsorships and donations, ensuring their management in synergy with the provisions and principles of our Code of Ethics and anti-corruption system.

We implement initiatives and projects that benefit the community and especially all those categories of people who live in situations of hardship due to their physical, mental, family, economic, ethnic and social conditions. In particular, we support local communities by promoting digitisation, citizen welfare and socio-economic development of the territory, as well as social and financial inclusion.

We foster an inclusive approach and constant dialogue with citizens, institutions and third sector associations, both locally and nationally, in a continuous process of reconciling different needs and requirements.



OUR RELATIONSHIP WITH THE PUBLIC ADMINISTRATION AND AUTHORITIES





Innovation





OUR RELATIONSHIP WITH THE PUBLIC ADMINISTRATION AND AUTHORITIES

Fairness and cooperation

"We promote and support dialogue and active cooperation with authorities and institutions."

We establish relations with the public administration based on the principles of fairness and transparency. Through our People and our collaborators, we actively cooperate with the Authorities (Supervisory and Judicial) and public institutions, adopting a conduct characterised by fairness, professionalism, collaboration and transparency.

Such relations are reserved for the competent corporate functions and figures, in accordance with the system of powers of attorney and proxies, as well as in compliance with the strictest legal and regulatory provisions, and may in no way compromise our integrity and reputation.

“**Our values** are at the **heart of our Company**, with the aim of improving and responding promptly and effectively to the needs of the Company and the Country.”

IMPLEMENTATION, DISSEMINATION AND MONITORING PROCEDURES



IMPLEMENTATION, DISSEMINATION AND MONITORING PROCEDURES

We supervise compliance with the Code of Ethics by setting up appropriate information, prevention and monitoring tools and procedures, also ensuring the transparency of operations and conduct implemented and intervening with corrective actions if necessary.

In particular, the competent Corporate Affairs functions are committed to promoting the correct and effective distribution of the Code of Ethics, including through specific training and communications initiatives.

AWARENESS OF AND COMPLIANCE WITH THE CODE OF ETHICS

We require Recipients to be aware of the principles and contents of the Code of Ethics, as well as with the reference procedures governing the duties performed and the responsibilities covered.

The implementation of the Code of Ethics depends on the commitment and responsibility of everyone, through full awareness of the contents of this document and the values that inspired it. Indeed, we ask all Recipients to:

- read the Code;
- understand the principles and rules of conduct set out therein;
- contact the departments responsible for disseminating, raising awareness of and complying with the Code of Ethics to obtain advice on its application;
- comply with the Code of Ethics and actively contribute to its concrete application, including by reporting any doubtful conduct.

We guarantee Recipients easy access to the Code of Ethics on the company's web portals.

To this end, we are committed to disseminating the Code of Ethics as widely as possible to the Recipients, also through training and information initiatives aimed at sharing the contents of the Code and creating awareness of the principles and rules of conduct for day-to-day activities and the related methods of implementation.

REPORTING VIOLATIONS

In order to bring to light any irregularities or alleged offences, we provide Recipients or other third parties having business relations and relationships with Poste Italiane (e.g. customers and suppliers) with communication channels (Whistleblowing channels) suitable for guaranteeing the receipt and management of substantiated reports of relevant conduct based on accurate and consistent factual elements, ensuring the protection of the reporting person in line with the applicable legislation.

These channels are available on the dedicated pages of the institutional websites of the Poste Italiane Group, which also regulate the procedures.

The Whistleblowing Committee, which also performs the functions of the Ethics Committee, is in charge of receiving and handling reports.

DISCIPLINARY ACTIONS

Any violation of the principles and provisions of the Code of Ethics harms the relationship of trust established with Poste Italiane and may lead to the investigation of legal action and the adoption of measures against the Recipients, in accordance with the provisions of the law and the contractual arrangements.

If a violation of the principles of the Code is verified, the Ethics Committee will bring the case to the attention of the relevant corporate function or corporate bodies.

APPROVAL AND REVISION OF THE CODE OF ETHICS

The Code of Ethics is adopted by resolution of the Board of Directors of each company of the Poste Italiane Group, which also approves subsequent updates.

Poste Italiane SpA

Registered office: Viale Europa, 190 - Rome
Fully paid-up share capital: €1,306,110,000.00
Tax Code and Rome Companies' Register no. 97103880585/1996
Business Registration Number in Rome: REA 842633
VAT no. 01114601006

Edited by
Corporate Affairs - Communication
Poste Italiane SpA

October 2023

This document is available for inspection on the Company's website at
www.posteitaliane.it

Design project by

Graphic layout by

Printed by

RECYCLED
Paper made from recycled material
FSC® C105587

Posteitaliane