

Organization, Management and Control Model

ANNEX 2

Code of Ethics

1. PREAMBLE

Legislative Decree No. 231 of June 8, 2001, titled "*Regulation of the administrative responsibility of legal entities, companies, and associations, even without legal personality*," introduced into the Italian legal system the liability of Entities for offenses committed in their interest or for their benefit by employees and/or other subjects specified in Article 5 of the same Decree. It also provides that the adoption and effective implementation of an appropriate Organization, Management, and Control Model (hereafter also referred to as the "Model") constitutes a condition for the Entity's exemption from liability.

Indeed, one of the purposes of the Model is to identify specific principles that all company representatives must adhere to and whose compliance must be ensured through specific control protocols. These principles may be established not only in the Model but also in the Code of Ethics (hereafter also simply referred to as the "Code"), which represents the set of values and ethical principles that the Company recognizes as its own and requires observance from all those who, either permanently or temporarily, interact with it.

The Code of Ethics must therefore be regarded as the essential foundation of the Model, as together they form a systematic *body* of internal regulations aimed at fostering a culture of corporate ethics and transparency.

The Code of Ethics of Italian Cable Company S.p.A. (hereafter also simply referred to as "ICC S.p.A." or the "Company") is an integral part of the Model pursuant to Legislative Decree No. 231/2001 and expresses the set of commitments and responsibilities undertaken towards its *stakeholders*. It contains the rules of conduct by which the principles of deontology are implemented, enriching corporate decision-making processes and guiding behaviors.

The Code of Ethics consists of:

- The ethical principles that define the reference values that must inspire the behavior of ICC S.p.A.;;
The conduct criteria to be followed in relations with all stakeholders with whom ICC S.p.A. interacts;
- The identification of mechanisms that form the control system to ensure the correct application of the Code.

2. PURPOSE, RECIPIENTS, AND SCOPE OF APPLICATION

ICC S.p.A. considers its reputation, reliability, and credibility as essential resources to be maintained and developed in relation to all its *stakeholders*.

Based on this consideration, the Code of Ethics was created, encompassing a set of principles whose observance is fundamentally important for the management, image, and reputation of the Company.

These principles exemplify the general obligations of fairness and loyalty, as well as the general guidelines for conduct that ICC recognizes, accepts, and shares, which must characterize the Company's conduct in relations with both external and internal stakeholders, as well as the behavior of employees and collaborators in the workplace.

The principles and provisions of this Code are binding on shareholders, members of the Corporate Bodies, Senior Management, executives, employees, agents, and collaborators of the Company, and all those who interact with ICC.

Conduct that contravenes the principles and rules of conduct expressed in the Code constitutes a violation of the obligations of those who collaborate with the Company in any capacity and will be sanctioned by the competent bodies accordingly.

Within the scope of individual responsibilities, the actions of all those who act on behalf of the Company must contribute to pursuing the objectives of this Code, in compliance with the applicable laws and the instructions issued by supervisory and control bodies, as well as internal regulations.

ICC S.p.A. is committed to disseminating and periodically updating the Code of Ethics, using all possible means to encourage its full application.

This Code of Ethics is published on ICC's website and is available to personnel on the company intranet.

3. REFERENCE VALUES OF ICC S.P.A.

Italian Cable Company S.p.A.

- Promotes the enhancement of human resources through professional development paths and participation in the Company's objectives, paying attention to the needs and legitimate expectations of both internal and external stakeholders, to improve the sense of belonging and satisfaction levels;
- Facilitates the integration of human resources within the corporate organization by encouraging collaboration and dialogue to achieve common corporate objectives;
- Pursues, with fairness and transparency, objectives of efficiency, effectiveness, and cost-effectiveness of management systems to increase profitability and competitiveness and to meet current *standards* of innovation through continuous updating;

- Pursues corporate objectives while recognizing the centrality of the needs of external and internal customers;
- Protects and promotes workplace safety by providing all employees with personal protective equipment suitable for their tasks or roles;
- Promotes the sustainable development of its activities by encouraging an environmental sustainability policy;
- Ensures that all actions, operations, transactions, and, in general, the conduct of corporate bodies, personnel, and collaborators concerning the activities carried out in the exercise of their duties and responsibilities are conducted with the utmost honesty, impartiality, confidentiality, and transparency.

3.1. General Ethical Principles

The ethical principles that must inspire and guide the activities of ICC S.p.A. are listed below. These criteria must be followed regardless of compliance with laws or regulations governing the activities of ICC S.p.A., whose respect is binding and forms the basis for evaluating the correctness of the conduct of ICC S.p.A. employees. In any case, personal actions or behaviors that could negatively affect the image and reputation of the Company must be avoided.

3.1.1. Honesty and Compliance with Laws and Regulations

In the course of their activities, the directors, employees, and collaborators of the Company are required to comply with current regulations, whatever their rank, the Code of Ethics, and all internal procedures and regulations.

It is in the interest of the Company that corporate objectives are achieved in compliance with all applicable regulations, in full respect of legality.

The pursuit of the Company's interest can never justify conduct contrary to applicable laws and principles of fairness and honesty.

Rapid regulatory changes or evolutions may require significant adaptation efforts from the corporate organization: in any case, all recipients of this Code are required to accept the changes with responsibility, professionalism, and integrity. Actions and personal behaviors that could negatively affect the Company's image and reputation in the eyes of the public must be strictly avoided.

3.1.2. Impartiality and Dignity

In defining corporate strategies and in making every decision or course of action, any form of discrimination based, for example, on race, nationality, gender, religious beliefs, age, health, political or union opinions must be avoided.

Discrimination, harassment, or sexual, personal, or other types of offenses, or the creation of an intimidating, hostile, or isolating work environment towards individuals or groups of workers, are not tolerated.

ICC S.p.A. believes that any behavior that constitutes harassment or violence, including gender-based, in the workplace is unacceptable.

In the event that harassing or violent behavior occurs, it will be reported and prosecuted in all competent venues.

Since respect for the dignity, personal freedom, and professionalism of Workers is realized in a work environment capable of preventing and combating situations of violence and harassment and promoting a culture of respect, including gender respect, the Company is committed to fostering interpersonal relationships based on principles of equality, collaboration, and mutual fairness.

3.1.3. Confidentiality and Privacy Protection

ICC S.p.A. ensures the confidentiality of the information in its possession and refrains from seeking confidential data unless explicitly authorized by the parties concerned or ordered by the competent authority and, in any case, always in accordance with current legal regulations, ensuring that its employees and collaborators use the confidential information acquired due to their relationship with the Company solely for purposes related to the performance of their duties.

ICC S.p.A., in the course of its activities, protects the personal data of collaborators and third parties, avoiding any misuse of their information, in compliance with relevant regulations and internal procedures.

3.1.4. Conflicts of Interest

In carrying out any activity, ICC S.p.A. operates to avoid situations of actual or even potential conflicts of interest. Employees/collaborators must avoid any situation or activity that could lead to conflicts of interest with ICC S.p.A. or interfere with their ability to make impartial decisions in the interest of the Company. Personnel must not take on external assignments in companies or commercial enterprises whose interests are directly or even potentially conflicting or interfering with those of ICC S.p.A. All decisions and business choices made on behalf of ICC S.p.A. must be made in its interest.

A conflict of interest arises when a director, employee, or collaborator performing a task on behalf of the Company has a private, actual, or potential interest that is:

- contrary to the best interest of the Company;
- so significant as to influence the impartial judgment or conduct that must always be ensured.

Examples of “conflict of interest” include”:

- the involvement of the employee, collaborator, or their family members in activities of suppliers, customers, competitors;
- the use of information acquired in the course of work activities for their own or third-party advantage and, in any case, in conflict with the Company's interests;
- the acceptance of money, favors, or other benefits from parties who have or would like to have business relations with the Company.

Employees and collaborators must act exclusively in the interest of the Company and avoid situations or relationships that create conflicts between their interests and those of the Company.

3.1.5. Commitment to Improvement

Employees and collaborators commit to ICC S.p.A. to give the best of their professional skills and continuously improve them using the tools provided by the Company. Mutual collaboration between parties involved in the same activity or operation is an essential principle for the Company and a key factor for its success. ICC S.p.A. is committed to creating a work environment characterized by accountability, trust, and mutual respect, enhancing the individuality and diversity of individuals, where everyone feels responsible and an integral part of corporate performance and reputation. The Company also undertakes to ensure that within its corporate organization, the annual objectives, both general and individual, of managers, employees, and collaborators working for the Company, are focused on specific, concrete, measurable results and related to the time foreseen for their achievement.

3.1.6. Corporate Assets

Employees and collaborators are required to act with due diligence to safeguard corporate resources through responsible behavior in line with corporate *policy* regulating their use. In particular, every employee/collaborator must use the resources entrusted to them or for which

they are responsible with care, avoiding improper uses that may cause harm or, in any case, conflict with the company's interests or applicable regulations.

Fraudulent or improper use of corporate assets by employees/collaborators to gain unauthorized advantages is not allowed; the Company does not tolerate fraud, theft, negligence losses, or waste at the expense of these assets.

3.1.7 Management and Use of Information Systems

The Company is committed to conducting its activities in compliance with applicable regulations on the use and management of information systems and ensuring their proper use by its employees.

Under no circumstances is it permitted to use IT and network resources for purposes other than work, to commit or induce the commission of crimes, to damage or alter third-party information systems and data (Private or Public Entities), or to illegally obtain confidential information.

No recipient is permitted to install unlicensed software on Company-owned or Company-used hardware, or to use and/or copy copyrighted documents and materials (audiovisual, electronic, paper, or photographic recordings or reproductions) without the express permission of the holder, except where such activities fall within the normal performance of the assigned duties.

The provisions of the *Regulations for the use of IT tools* are fully referenced.

3.1.8 Gifts, donations, and sponsorships

The Company generally prohibits any form of gift that could in any way be interpreted as exceeding normal commercial or courtesy practices, or that is otherwise intended to obtain favorable treatment in the conduct of any activities in any way connected to ICC S.p.A. Employees and collaborators are prohibited from:

- granting benefits and gifts to customers, suppliers, consultants, agents, or others, either directly or indirectly, acts of courtesy and hospitality, except when the value, nature, and purpose of the gift are considered legal and ethically correct, such that they do not compromise the Company's image and that the value and nature of the gift cannot be interpreted as a means of obtaining favorable treatment for the Company;
- accepting gifts from customers, suppliers, consultants, agents, or others that may be perceived as a way to influence the impartiality and integrity of their decisions.

Donations and charitable contributions must exclusively support initiatives deserving protection in social, cultural, and moral terms, that are lawful and ethical and do not create conflicts of interest.

The Company prohibits that gifts, donations, and charitable contributions be made using non-traceable payment methods.

3.1.9 Monetary payments

Employees and collaborators are prohibited from responding to improper requests for money or other benefits from any person.

In such cases, the employee or collaborator must promptly inform their supervisor and suspend any business relationship with the requester.

3.1.10 Competition

The Company supports a model of open and fair competition, rejects ethically questionable practices, and does not use information acquired from illegal activities to the detriment of competitors or other market actors.

The Company, its employees, and collaborators are therefore committed to the highest compliance with competition and market protection laws in any jurisdiction and to cooperating with market regulatory authorities. No employee/collaborator may be involved in initiatives or contacts with competitors (for example, but not limited to: agreements on prices or quantities, and others) that may appear to violate competition and market protection regulations.

3.1.11 Transparency and traceability

All actions and operations of the Company must be adequately documented and recorded, allowing for verification of the decision-making, authorization, and execution process. Each operation must be supported by appropriate documentation to enable, at any time, the execution of controls that certify the characteristics and motivations of the operations and identify those responsible for authorizing, recording, and verifying the operations.

ICC S.p.A. ensures the completeness and clarity of the Company's accounting data, reports, and financial statements. Adequate documentation must be maintained in support of each operation, enabling easy accounting registration, reconstruction of the operation, and identification of any responsibilities. ICC S.p.A. prohibits the concealment or destruction, in whole or in part, of accounting records or documents whose retention is legally required. The duty of confidentiality regarding non-public information must be strictly respected by employees and collaborators.

3.1.12 Information completeness

In preparing communications, reports, prospectuses, and notices addressed to Public Authorities, customers, suppliers, and its own employees and collaborators, ICC S.p.A. adheres to principles of transparency, correctness, and completeness to ensure full compliance with current regulations. All mandatory communications must be prepared by persons authorized by appropriate delegations. All information must be provided clearly and comprehensively to protect the Company's assets and safeguard the interests of all stakeholders. ICC condemns any conduct aimed at altering the accuracy and truthfulness of data and information contained in financial statements, reports, or other legally required corporate communications addressed to shareholders, Public Authorities, or third parties.

3.1.13 Preventing corruption, receiving stolen goods, money laundering, the use of money, assets, or benefits of illicit origin, and self-laundering

ICC S.p.A. condemns any conduct that may constitute an act of corruption, receiving stolen goods, money laundering, the use of money, assets, or benefits of illicit origin, as well as self-laundering. Employees and collaborators must report, as outlined below, any attempt of corruption by personnel toward Public Officials, Public Service Officers, or private individuals. The Company expressly prohibits its personnel from:

- purchasing, replacing, or transferring money, assets, or other benefits while being aware of their criminal origin; or conducting other operations related to them, in a way that impedes the identification of their criminal origin;
- using money, assets, or other benefits in economic or financial activities while being aware of their criminal origin.

ICC S.p.A. commits to conducting adequate checks on the commercial and professional reliability of suppliers, customers, and commercial *partners*, to verify their respectability and the legitimacy of their activities.

3.1.14 Health and safety protection in the workplace

ICC S.p.A. requires compliance with regulations on health and safety protection in the workplace and considers safeguarding the safety and health of workers and collaborators a top priority, along with the continuous improvement of working conditions.

ICC S.p.A. applies the current regulations on workplace safety and hygiene, and each recipient must pay the utmost attention in carrying out their activities, strictly adhering to all established safety and prevention measures. In particular, all provisions dictated by the Consolidated Safety Act (Legislative Decree of April 9, 2008, no. 81) and any other applicable legal provisions must be observed, good practice standards related to the activities carried out must be applied, and the

prevention measures set out in the Risk Assessment Document prepared by the Company and the company's emergency, safety, and evacuation management procedures must be respected.

Recipients are required to comply with the regulations in force, as well as the instructions and directives provided by the persons to whom ICC S.p.A. has delegated the fulfillment of safety obligations, and to promptly report any deficiencies or failure to comply with applicable regulations.

ICC S.p.A. places the highest emphasis on protecting the health and safety of workers employed in its activities and applies procedures aimed at the continuous improvement of working conditions and the safety of production processes. ICC S.p.A. promotes with operational tools the participation of workers in the joint analysis of problems and the identification of the best solutions.

To implement its workplace safety policy, ICC S.p.A. provides continuous training and raises awareness among all personnel on safety issues. Furthermore, ICC S.p.A. prohibits any employee/collaborator from performing work while intoxicated or under the influence of drugs, hallucinogens, or any substances that affect the regular conduct of work activities. ICC S.p.A. has established a smoking ban in all its workplaces.

3.1.15 Environmental Protection

ICC S.p.A. is committed to environmental protection, complying with current international and national regulations on environmental matters, and raising awareness among employees and collaborators regarding issues related to environmental protection and preservation to avoid or minimize any negative impact on the environment.

ICC S.p.A. promotes the use of cutting-edge technologies to ensure the constant improvement of its environmental performance. The Company adopts a policy of environmental sustainability in its processes and intends to continuously improve its environmental efficiency by reducing waste, combating wastefulness, and preventing pollution.

It is the obligation of the recipients to comply with national and international regulations and company procedures and practices regarding environmental matters and promptly report any deficiencies or non-compliance with applicable regulations.

4. CONDUCT CRITERIA

4.1. Relations with customers

ICC S.p.A. consistently shows sensitivity and attention to the quality of relationships with customers and its continuous improvement, as this is a necessary premise for the process of value creation and distribution within the company.

Relationships with customers must be based on:

- full transparency, fairness, and confidentiality, characterized by courtesy and professionalism to consolidate trust and promote the Company's image;
- maintaining high standards of quality for its products and maximizing customer satisfaction;
- accurate identification of customer risk profiles;
- development of a pricing policy in line with the quality of the products offered;
- a timely response to complaints aimed at a substantive resolution of disputes.

Personnel, within their competencies, must always be informed and updated to offer satisfactory responses to customers and promote informed choices.

In this perspective, it is the responsibility of employees and collaborators assigned to customer relations to provide clear, complete, and understandable information to their interlocutors.

In dealings with customers, any form of internal or external influence aimed at affecting decisions in a manner inconsistent with the principles of fairness and transparency outlined in the Code of Ethics must be avoided.

4.2. Relations with suppliers

The principles applied to commercial relationships with customers must also characterize commercial relationships with suppliers, with whom ICC S.p.A. commits to developing fair and transparent relationships. Specifically, it ensures:

- standard methods of supplier selection and management. In the supplier selection process, their professionalism, reliability, and quality must be considered, favoring companies committed to complying with current regulations on environmental protection, workplace safety, the protection of the right to privacy, and adherence to fiscal and contributory regulations.
- criteria and systems for constant monitoring of the quality of services and goods provided.

Service supplies must always comply with and be justified by concrete business needs, motivated, and explained by the respective managers authorized to commit expenditure.

The provisions of the *Supplier Code of Conduct* are recalled in full.

ICC S.p.A. refuses to engage in any relationships with entities that do not intend to operate in strict compliance with current regulations or refuse to conform to the values and principles that inspired this Code.

4.3. Relations with employees, collaborators, interns, finders, and agents

The Company, recognizing human resources as a fundamental and indispensable factor for corporate development, considers it important to establish and maintain relationships based on mutual trust with employees, collaborators, interns, finders, and agents.

The Company is therefore committed to developing the skills and potential of its personnel in carrying out their duties, ensuring that individuals' abilities are fully realized in the pursuit of corporate goals.

Each manager is required to value the professionalism and working time of the personnel under their responsibility, requesting performances consistent with the tasks and work plans, the corporate organizational structure, and the instructions received from their superiors. ICC S.p.A. is committed to offering equal opportunities for employment and professional growth to all employees based on their skills and professional qualifications, without discrimination.

The Company creates a work environment that is adequate in terms of safety and psycho-physical health, opposing discriminatory behaviors or those harmful to individual dignity, particularly any form of harassment.

During hiring, candidate evaluations are conducted based on their suitability for the profiles required by the Company, verifying the skills and potential that can be developed within the corporate organization. The requested information is strictly related to verifying the presence of the required professional profiles and the necessary personal and psycho-attitudinal characteristics, in compliance with the candidates' privacy and opinions. Personnel are hired solely based on regular employment contracts, under which the Company provides all necessary information to define the characteristics of the duties and activities to be performed, the regulatory elements governing the established relationship, and the due compensation.

Relationships with employees, collaborators, interns, finders, and agents are governed by specific contracts in which the Company provides clear and specific information necessary to define the activities to be performed, the regulatory elements governing the established relationship, and the due compensation.

All employees, collaborators, interns, finders, and agents must act in good faith to comply with the obligations undertaken with the signing of the respective contracts, ensuring the required performance and aligning their behaviors with the applicable regulations, individual and collective labor contracts, as well as the Code of Ethics.

Through appropriate communication and training activities, ICC S.p.A. informs its employees, collaborators, and agents of the contents and provisions of the Code of Ethics.

Employees, collaborators, interns, finders, and agents must strictly adhere to internal safety and health provisions, refraining from conducting actions potentially harmful to their health and physical integrity or others, and reporting any dangerous situations or violations of internal regulations to their superiors or competent corporate bodies.

Any inquiry into employees' and collaborators' ideas, preferences, and personal tastes, and more generally, into aspects related exclusively to their private lives, is prohibited. Personal data of employees and collaborators may not be disseminated or - except in cases permitted by law - communicated without the prior consent of the data subject.

Each employee/collaborator/agent is required to operate with due diligence to protect corporate resources through responsible behavior and in line with operational procedures prepared to regulate their use.

Specifically, each employee/collaborator/agent must carefully use the resources entrusted to them or for which they are responsible, avoiding improper uses that may cause harm or conflict with the company's interests or with applicable regulations.

Regarding IT applications, each employee/collaborator/agent is required to strictly comply with the corporate security policies established to protect and control IT systems.

Each employee/collaborator/agent must know and implement the company's policies on information security to ensure its integrity, confidentiality, and availability.

The principles of transparency, independence, and integrity must characterize the relationships maintained by the Company's competent corporate functions with trade unions. ICC S.p.A. establishes relationships with them in a responsible and constructive manner, fostering an atmosphere of mutual trust and dialogue.

4.4. Relationships with shareholders

ICC S.p.A. assigns a leading role to the shareholders, who act both as financiers and as individuals capable of influencing, through assembly resolutions, the life of the company. The Company undertakes to ensure equal treatment for all categories of shareholders, avoiding preferential behavior. Shareholders must be able to easily access transparent and reliable company information;

For the protection of this dual role, the Company undertakes, on one hand, to safeguard and enhance the value of the business to ensure adequate returns on invested capital,

and on the other, to guarantee shareholders, in compliance with the applicable regulations, knowledge of the company's life that allows them to make informed decisions.

4.5. Relationships with Auditors and Accountants

ICC S.p.A. conducts its relations with the Auditors and Accountants with the utmost diligence, professionalism, transparency, collaboration, and availability, fully respecting their institutional role, promptly and diligently carrying out the prescribed actions and any requirements.

In particular, Auditors and Accountants must have free access to data, documents, and information necessary for the performance of their activities. It is strictly forbidden to prevent or hinder the legally assigned control activities of the supervisory body and the auditing firm, or to influence the independence of judgment of these subjects in order to alter the representation of the company's facts and the financial, economic, and asset situation of ICC S.p.A..

4.6. Intragroup relationships

ICC S.p.A. requires the companies within the Group:

- to comply with the values of this Code of Ethics and to collaborate fairly in pursuing corporate objectives, in compliance with the law and the applicable regulations;
- to avoid behavior that could damage the integrity or image of one of the Group's companies;
- to cooperate in the interest of common objectives, promoting communication between the different Group companies, encouraging and utilizing intragroup synergies;
- to circulate information within the Group, in accordance with the principles of truthfulness, fairness, completeness, clarity, transparency, and caution, while respecting the autonomy of each company and the specific areas of activity.

4.7. Relationships with Public Administrations

Relations with Public Administrations are reserved exclusively for the corporate functions assigned and authorized in accordance with the company's specific procedures. In any case, the behavior of the Corporate Bodies, employees, and collaborators of ICC S.p.A. towards the Public Administration must be based on the utmost fairness, independence, and integrity.

It is prohibited to exert pressure or engage in other behaviors by those acting in the name or on behalf of ICC S.p.A. in the management of relations with the Public Administration aimed at inducing it to take favorable stances or make decisions in favor of the Company illicitly or in any case, contrary to the principles of this Code.

It is forbidden to comply with requests from Public Administration personnel aimed at making decisions and acts in favor of the Company subject to any kind of recognition. Should such episodes occur, it is the duty of the affected personnel to promptly inform their superiors.

No one is permitted to accept or offer gifts, even in relationships with individuals not belonging to the Public Administration, except within the strict limits indicated by internal regulations and resolutions, which are in any case adequately motivated and adopted in accordance with laws, ethical principles, and regulations of all kinds.

ICC S.p.A. promotes traceability and transparency in relations with the Public Administration in all its manifestations and/or representations, particularly with specific reference to relations with tax/social security offices. These must take place in compliance with company procedures, which include a specific delegation and reporting system.

5. IMPLEMENTATION AND CONTROLS

5.1. Dissemination of the Code of Ethics

ICC S.p.A. strives to ensure that the Code of Ethics is brought to the attention of all concerned parties by appropriate and adequate means. It ensures its updating and guarantees its compliance by activating, when necessary, the most appropriate sanctioning procedures depending on the nature of the relationship with the violators.

The adoption of this Code of Ethics is communicated to all managerial and non-managerial personnel employed by the company, as well as to close collaborators at the time of its adoption. A copy of the Code of Ethics is provided to new personnel upon hiring.

Specific information on the policies and procedures adopted by the Company based on the Code of Ethics must be provided to external parties to ICC S.p.A. Commercial partners, consultants, intermediaries, agents, and external collaborators are informed, at the time of initiating the collaboration, of the adoption of the Code of Ethics by the Company and the need for their behavior to conform to the ethical principles and conduct guidelines adopted by ICC S.p.A. through the Code of Ethics.

5.2. Control of the Code of Ethics

The Supervisory Body, appointed by the Administrative Body of ICC S.p.A. pursuant to Legislative Decree 231/2001, is responsible for controlling and updating this Code of Ethics and the adopted organizational and management model.

The Supervisory Body is also entrusted with a series of tasks regarding the Code of Ethics, including:

- promoting the dissemination of the Code of Ethics among ICC S.p.A. employees, customers, suppliers, *partners*, subsidiaries, and generally among all interested third parties;
- suggesting, where appropriate, revisions and updates to the Code of Ethics;
- evaluating, in conjunction with the relevant corporate functions, violations of the Code of Ethics of significant importance in compliance with laws, regulations, and national collective bargaining agreements (CCNL);
- assisting employees who report behaviors that do not comply with the Code of Ethics, protecting them from pressure, interference, intimidation, and retaliation;
- supporting and suggesting communication programs to employees and recipients in general.

5.3. Disciplinary system

Sanctions are provided for violations of the principles contained in this Code of Ethics according to the prescriptions and methods outlined in the Organization, Management, and Control Model pursuant to Legislative Decree 231/2001 adopted by ICC S.p.A. These sanctions are applied regardless of the possible initiation of criminal proceedings.

5.4. Reporting

Any violation of the Code of Ethics must be promptly reported according to the methods established by the *Procedure for handling reports of unlawful conduct and whistleblower protection (commonly referred to as "Whistleblowing")* approved by the Board of Directors on 06/12/2023 and published on the Company's website. Reports, like any other violation of the Code identified through other investigative activities, are promptly evaluated by the competent bodies for the adoption of necessary measures.

Reports by individuals broadly connected to Italian Cable S.p.A. (employees, temporary workers, freelancers, professionals, consultants, agents, intermediaries, collaborators, those providing services to the Company based on intragroup service contracts, interns whether paid or not, suppliers and subcontractors, clients, commercial partners, shareholders, and persons with functions of administration, direction, control, supervision, or representation) may be made through the internal reporting channel adopted by the Company in accordance with Legislative Decree No. 24/2023 regarding the protection of individuals who report violations of Union law and national regulations, with the reporting methods provided by the *"Procedure for managing reports of unlawful conduct and whistleblower protection,"* available to all potential stakeholders who become aware of the aforementioned violations.