

GROUP INTEGRATED POLICY POSTE ITALIANE

Approved by the Board of Directors on 18 June 2026

The Poste Italiane Group constitutes the largest integrated, omni-channel service platform in Italy, one that is active in logistics, mail and parcels, financial and insurance services, payment systems, telecommunication 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, environmental responsibility, anti-bribery, whistleblowing, fraud prevention and control, information security and personal data protection. These principles help ensure the highest levels of effectiveness and efficiency of processes, activities and resources management.

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 the management systems currently in place within the Group in an integrated and centralised manner ("Integrated Management System").

This Policy reflects these choices by "integrating" the different aspects for which Poste Italiane defines and documents its commitment, towards all its stakeholders, to improve its performance and at the same time build and develop trusting relationships with them, as part of a process of generating and sharing value and with a view to reconciling the respective interests. To guarantee this commitment, Poste Italiane has adopted a Code of Ethics that has been widely disseminated to all the Group's counterparties.

In the day-to-day performance of its activities, Poste Italiane therefore undertakes to comply in a timely manner with the applicable regulations: ISO 37301 for Compliance management, ISO 9001 for Quality management, ISO 45001 for Occupational Health and Safety management, ISO 14001 for Environmental management, ISO 37001 for preventing situations that could lead to potential and/or actual bribery, ISO 37002 for the Whistleblowing management), ISO 37003 for Fraud Control management, ISO/IEC 27001 (with extension to ISO/IEC 27017 and ISO/IEC 27018) and ISO/IEC 20000-1 respectively for information security management (extended to cloud services) and for the management of information systems to support business processes.

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

- Adopt Risk-Based Thinking as a strategic tool for business management, aimed both at mitigating all risks associated with the activities carried out and at identifying and consolidating opportunities for improving its products and processes;
- Use appropriate tools and indicators to monitor performance in terms of compliance, quality, occupational health and safety, environment, anti-bribery, whistleblowing, fraud control, information security and management of information systems;
- of activities and results obtained with respect to certifications, via self-monitoring of Systems, with a view to continuous improvement;
- Make staff aware of the most relevant issues of the Management Systems, through the use of the most appropriate tools and channels, with a view to continuous improvement of processes;

- Develop the information and experience base, through continuous staff training, in order to achieve the objectives set for the Management Systems;
- Promote initiatives aimed at raising awareness, training and involving all employees and relevant business associates on issues and content related to Management Systems, in particular for aspects of anti-bribery and fraud control;
- Promote the reporting of any critical issues encountered in the application of the Management Systems and highlight the initiatives undertaken in response to the guidelines set out in the Policy; make the data relating to its activities available on the dedicated institutional website;
- Submit the Management Systems for verification by an external Certification Body.

COMPLIANCE

Specifically with regard to Compliance management issues, Poste Italiane undertakes to carry out its activities according to the ISO 37301 standard, through the adoption of the following principles and activities:

- Implement control systems suitable for preventing the commission of offences and ensuring conduct based on the criteria of fairness, loyalty and moral integrity;
- Ensure continuous monitoring of regulatory developments in order to guarantee implementation, ensure dissemination and promote knowledge of applicable rules and regulations;
- Comply, at every level of the company, with all laws, rules and regulations and apply appropriate disciplinary procedures, sanctions and corrective measures in the event of violation or non-compliance;
- Promptly adapt corporate processes to changes in the provisions applicable to the Group, including through a preventive approach to non-compliance risks and the establishment of 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 breach of the law, whether direct or indirect, and not to facilitate or risk involvement in unlawful situations, with public or private entities;
- Provide a framework for identifying, reviewing and achieving compliance objectives, including with a view to continuous improvement;
- Prepare internal tools, both regulatory and operational, that define rules of conduct, principles and/or control models aimed at the correct identification, measurement, management and monitoring of the main risks related to Compliance;
- Identify the roles and responsibilities regarding Compliance within the organisation, both at central level and in the regulatory areas and business sectors, and allocate the necessary resources to identify and achieve the compliance objectives;
- Ensure the integration of compliance aspects within the Internal Control and Risk Management System, including through information and technology systems for mapping, assessing and processing regulatory 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;
- Prosecute any conduct 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 offences by third parties that have dealings with the company, including joint venture partners and parties upstream and downstream of the supply chain (e.g. agents, intermediaries, sellers, contractors, suppliers);
- Identify a Compliance Function that has the appropriate competence, status, authority and independence to exercise its role, which consists of supervising the planning and implementation of the system, providing advice to personnel and appropriate training activities on compliance, ensuring suitable models of compliance with applicable regulations and in particular with the ISO 37301 standard, and being responsible for the overall Compliance Management System;
- Ensure effective and transparent communication that ensures dissemination of the culture of rules at all organisational levels, through awareness and knowledge of information that is 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, including with regard to relevant Compliance aspects.

ANTI-BRIBERY

With specific reference to Anti-Bribery, Poste Italiane undertakes to meet the requirements of the Anti-Bribery Management System according to the ISO 37001 standard and, together with the companies directly or indirectly controlled by it (the latter according to the peculiarities of their business, their size and taking into account the regulations applicable to them), to carry out its activities through the following general principles:

- Ensure conduct based on the criteria of fairness, loyalty and moral integrity, adopting a zero-tolerance approach to bribery ;
- Comply with all laws, rules and regulations relating to the prevention of bribery ;
- Promote and develop, internally and externally to the Organisation, a culture of integrity and anti-bribery, by demonstrating active and consistent commitment;
- Conduct its activities in such a way as not to commit any act of bribery in any form, whether direct or indirect, and not to facilitate or risk involvement in unlawful situations, with public or private entities;
- Provide a framework for identifying, reviewing and achieving Anti-Bribery objectives;

- Encourage the reporting of suspicions in good faith or on the basis of reasonable belief, without fear of retaliation and ensuring that no whistleblower is discriminated against with effects on working conditions related to the report;
- Prosecute any conduct that does not comply with the anti-bribery policy through the application of the Company's disciplinary system for Company personnel or the implementation of the most appropriate sanctioning actions against business associates;
- Encourage every possible effort to prevent bribery by third parties connected to them, including joint ventures and parties upstream and downstream in the supply chain (e.g. agents, intermediaries, sellers, contractors, suppliers);
- Ensure that the "Anti-Bribery Function" has the appropriate competence, status, authority and independence to exercise its role of supervising the planning and implementation of the system, providing advice to staff and business partners on the anti-bribery system and issues, ensuring compliance with ISO 37001 and reporting to Senior Management on the performance of the system.

In addition, Poste Italiane 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 with specific principles of conduct defined, including those provided for in the Organisation, Management and Control Model adopted pursuant to Italian Legislative Decree 231/2001.

In particular, Poste Italiane, in line with the provisions of the Code of Ethics and the Company Regulatory System, prohibits the following:

- Accept requests, authorise someone to receive, or solicit, directly or indirectly, a payment or an economic advantage, another benefit or advantage from public or private entities;
- Offer, promise, give, pay or authorise someone to give or pay, directly or indirectly, money, other economic advantage, benefit or advantage of any kind to public or private entities;
- Receive or obtain the promise of money or other benefits, for oneself or for others, to perform or omit acts in violation of the obligations inherent in their office or of the obligations of loyalty, including causing damage to the companies themselves;
- Promise or pay sums of money, offer goods in kind or other benefits to interested associations to promote or favour Poste Italiane interests.

In addition, for the activities of Poste Italiane that can be identified as most sensitive to the risk of bribery, 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 their possible forms), adopting conduct characterised by fairness, professionalism, collaboration, and transparency. These relationships are reserved for the competent functions and positions, in line with the system of powers of attorney and proxies and in the strictest compliance with anti-bribery legal and regulatory provisions, and may in no way compromise the integrity and reputation of Poste Italiane. In such relationships, the Group must not attempt to improperly influence the decisions of the public institution concerned.

- **Gifts, presents or other advantages of any kind**

Business courtesies, including gifts and hospitality, are permitted only where they are reasonable, proportionate and of modest value, so as not to compromise the integrity or reputation of one of the parties, in accordance with any limits set by the counterparties concerned and with anti-bribery legislation, and should not be reasonably be perceived by an independent third party as being designed to improperly gain an advantage.

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 prohibited to receive and distribute gifts and presents or to grant other advantages of any kind in favour of representatives of the Public Administration or of third parties that go beyond normal business practices or courtesies, or that are in any event aimed at obtaining preferential treatment in the conduct of any business activity.

- **Facilitation payments**

All facilitation payments are prohibited, i.e. any form of payment or provision of other benefits, including those of a minimal amount, but with a corrupt intent. Poste Italiane neither makes facilitation payments, nor does it tolerate any of its employees or third parties, in the context of relations with the Group, to offer, promise, solicit, request, give or accept 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, either in Italy or abroad, except as established and permitted by applicable regulations.
 In its relationships with interest associations, Poste Italiane cannot promise or pay sums or goods in kind or other benefits to promote or favour Poste Italiane interests.
- 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 each supplier equal opportunities and the possibility to compete in tender procedures, excluding preferential treatment, through specific regulatory and/or organisational instruments, including: the use of the "direct assignment" procedure only for limited and clearly identified cases, adequately justified and documented and subject to appropriate control systems and authorisation systems at an appropriate hierarchical level; the methods and criteria for the preparation, approval, dissemination and publicising of the call for tenders; a model for the evaluation of tenders (technical/economic) based on transparency and the greatest possible limitation of subjective criteria; appropriate monitoring systems to ensure a correct and natural rotation of suppliers; standardised contractual provisions in relation to the nature and type, including contractual provisions aimed at ensuring compliance with control principles/ethical rules in the management of activities by the third party, and the activities to be followed in the event of any deviations.
 In order to avoid the occurrence of situations that may lead to incidents of bribery, it is prohibited to maintain relationships, negotiate and/or enter into and/or execute contracts or deeds with persons indicated in the Reference Lists (black lists) or who are members of organisations included in them, to provide services to consultants, partners and suppliers that are not adequately justified in the context of the contractual relationship established with them, and to pay fees to consultants, partners and suppliers that are not adequately justified in relation to the type of assignment to be performed. In particular, in order to disseminate the anti-bribery culture also to relevant business associates, Poste Italiane requires a commitment to train its personnel, who have dealings with the Organisation, on issues and content relating to bribery.

- **Conflict of interest**

Poste Italiane, in accordance with the principles of conduct set out in the Code of Ethics, manages the issue of conflicts of interest through the adoption of a Guideline that defines the situations in which conflicts may arise between personal interests and those of the Organisation, regulating the procedures for identifying such occurrences, the responsibilities for declaring them, and the monitoring and review of any conflicts that have arisen. These aspects were identified taking into account the recommendations of the ISO 37009 Guideline. In addition, the criteria and controls identified in the Guidelines are further specified, in a more detailed manner, in the Procedures and processes considered most sensitive to the risk of conflicting interests. In this regard, all staff are made aware of the need to report any situation of potential and/or actual conflict of interest.

- **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 bribery. For this reason, before they are granted, a specific due diligence process is initiated on the relevance of the initiatives, the reputation of the potential partner, their consistency with corporate objectives and the expected benefits. Subsequently, the consistency of the supported initiatives with the contractual provisions is periodically evaluated, the due performance of the activities is verified and the proper fulfilment of the contractual obligations by the beneficiary is ascertained.

- **Personnel selection and recruitment**

The selection and recruitment of Poste Italiane personnel are guided by the principles of fairness and impartiality. The profiles of the people hired must effectively meet the Company's needs, and they are chosen exclusively on the basis of professionalism and competence, excluding any form of favouritism. In addition to the prohibition on hiring persons indicated in the Reference Lists (black lists) or belonging to organisations present in them, the personnel selection and recruitment process includes specifications, such as: the search for a number of candidates according to the complexity of the role to be filled; the conduct of pre-employment checks aimed at preventing the occurrence of prejudicial situations; the management of conflicts of interest between the recruiter and the candidate; the verification of the consistency of the candidates with the defined profile; the definition of any impeding circumstances as well as the various

circumstances that are only a point of attention for recruitment following the completion of pre-employment checks.

- **Mergers, acquisitions and significant investments**

In order to avoid risks that the reference entity of a merger, acquisition or significant investment transaction has been or is still involved in acts of bribery, Poste Italiane has adopted mitigation measures that consist mainly of pre-transaction due diligence to verify that all risks of possible previous acts of bribery have been identified, a decision-making process that includes all necessary anti-bribery assessments, and the implementation of the Poste Italiane anti-bribery policy by the reference entity upon completion of the transaction internally.

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 disseminated throughout the value chain.

For this reason, Poste Italiane invests in training and information activities for its staff and relevant business associates. In order to ensure a minimum level of knowledge on anti-bribery matters among its employees, Poste Italiane implements a compulsory online and classroom training programme for all staff on anti-bribery principles and, in particular, on reporting mechanisms and any significant changes to anti-bribery legislation and/or the adopted regulatory framework.

Furthermore, Poste Italiane general and specific anti-bribery principles are communicated to its stakeholders through the Code of Ethics and this Policy.

In particular, with the aim of ensuring an adequate level of knowledge regarding the safeguards and processes adopted by our organisation to prevent bribery, Poste Italiane has provided for the engagement of its business associates identified as relevant. To this end, Poste Italiane has made available a programme of training content, which relevant business associates undertake to disseminate internally to the personnel involved in the activities covered by the agreements.

With regard to the roles and responsibilities for the management of this Policy, it is established that Poste Italiane functions play an active role in enforcing the principles of conduct described in this Policy and are responsible for creating and disseminating the culture of risk management within the organisation and for ensuring the supervision of the required conduct. Poste Italiane appoints a Function responsible for anti-bribery ("Anti-bribery Function") and the subsidiaries, in consideration of their size and/or organisational and operational context, as well as specific

applicable regulations, may similarly appoint an Anti-Bribery Function, responsible for its own perimeter, as well as a contact person, who works in coordination with the Poste Italiane function dedicated to overseeing the Anti-Bribery Management System.

WHISTLEBLOWING

Poste Italiane complies with legislative measures on the reporting of irregularities or violations of regulations, in order to enable the dissemination of ethical conduct in the workplace, strengthen compliance with regulations and corporate governance, and protect stakeholders, through the adoption of a system for reporting violations (Whistleblowing) and to regulate its organisational and procedural aspects, in accordance with the recommendations of the ISO 37002 standard.

In addition, Poste Italiane undertakes to pursue any conduct that does not comply with the whistleblowing system through the application of the corporate disciplinary system.

In line with the provisions of the Code of Ethics, Poste Italiane makes communication channels available to stakeholders (Whistleblowing), this procedure ensures the receipt and management of detailed reports regarding relevant conduct, based on accurate and consistent information and protection of the whistleblower in line with current legislation. The procedures for handling reports of irregularities in business conduct, acts or facts that may constitute a breach of the internal and external rules, and of the principles and rules of conduct contained in the Code of Ethics and Model 231 of Poste Italiane, including those relating to anti-bribery, are regulated in detail in the Guideline "Whistleblowing System" .The Ethics Committee is responsible for receiving and handling such reports.

FRAUD CONTROL

The Poste Italiane Group adopts a structured and integrated approach to Fraud Control, based on leadership, ethical organisational culture and risk management, with the aim of preventing, detecting and responding effectively to both internal and external fraud events, in line with the principles of ISO 37003 standard.

Furthermore, with the aim of implementing a structured and sustainable framework for ethical governance and fraud risk management, the Group is committed to integrating culture, fraud controls, processes, technology and training within its existing governance and compliance systems, in order to increase resilience to fraud, mitigate risks, protect corporate assets and consolidate the reputation and trust of stakeholders.

To this end and in accordance with its ethical principles and rules of conduct, , Poste Italiane is committed to:

- Promoting a culture of integrity, transparency and zero tolerance for fraud and other unlawful conduct, in line with corporate principles and values;
- Complying with all applicable legal, regulatory and contractual obligations;
- Adopting the appropriate actions, measures and tools to prevent fraud, as well as implement detection and response mechanisms against all types of fraud;
- Establishing a framework for defining and monitoring fraud control objectives;
- Promoting fraud awareness and providing appropriate training to employees and relevant business associates on issues and content related to fraud prevention;
- Encouraging the reporting, in good faith or on the basis of reasonable grounds, of suspected or actual fraud, while ensuring protection against retaliation.;
- Addressing any breach of the Fraud Control Policy through the application of the Company's disciplinary framework for employees or by adopting the appropriate contractual or legal remedies in relation to business associates.
- Communicating the Company's commitment to fraud control to all its stakeholders;
- Ensuring the continuous improvement of the Fraud Control Management System to respond to threats.

QUALITY

Specifically with regard to Quality issues, Poste Italiane undertakes to carry out its activities according to the ISO 9001 standard, through the adoption of the following principles:

- Foster lasting relationships of mutual trust with its customers through initiatives that are close to their needs, to local communities and that support the development of local areas, with the aim of promoting sustainable, digital and inclusive development of the country;
- Maintain adequate service quality, by ensuring efficiency and continuity of service in accordance with the specific requirements;
- Maintain the adequacy of the services offered to customers;

- Respect time and optimise the cost/quality ratio of products and services.

OCCUPATIONAL HEALTH AND SAFETY

The prevention of occupational risks is a fundamental principle that every employee must adhere to in the course of their daily activities.

The systematic oversight of all health and safety aspects is ensured by the adoption of a Health and Safety Management System (OHSMS), implemented in compliance with the requirements of the ISO 45001 standard. Poste Italiane undertakes to carry out its activities through the following principles:

- ensuring safe and healthy working conditions, in relation to all processes and workplaces;
- compliance with current legislation and any other stipulated requirements to ensure conformity with the provisions on occupational health and safety;
- raising awareness and involving everyone who works within the Company or has relations with it, through the spread of the safety culture, for its maintenance and constant improvement;
- continuous improvement of performance, through the monitoring and periodic review of occupational health and safety objectives.

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

- updating the risk assessment, rules and procedures for each activity that involves risks, in order to ensure a higher level of safety and to combat injuries 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 occupational health and safety objectives;
- timely adaptation to all regulatory applicable changes and updates;
- integration of the principles of health and safety in the workplace into 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 dissemination of any information that might be useful for prevention purposes, including cooperation and coordination measures with contractors;
- compliance with the requirements stipulated and absolute conformity with the provisions of the current occupational safety regulations;
- development, at all corporate levels, through training and information, of professional skills aimed at operating in compliance with prevention and protection measures;
- communication of information relating to health and safety as a key element in sharing the OHSMS;
- consultation and participation of workers, including through their representatives;
- periodic review to assess the correctness and effectiveness of the OHSMS, with a view to continuous improvement and the achievement of the defined objectives.

ENVIRONMENT

Poste Italiane promotes the protection of the environment throughout its value chain. Poste Italiane is committed to preventing, managing and, where possible, reducing the environmental impacts generated directly through its operational activities, in particular, from the use of buildings and logistics and transport activities, whether carried out directly or through suppliers and partners.

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

- analysis of the context and identification of policies 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 environmental objectives;
- development of a responsible culture through the promotion of information, training and refresher 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 each activity that involves risks to the environment;
- planning and management of the activities carried out, pursuing the rationalisation and minimisation of water and energy consumption and waste generation, favouring, where possible, its recovery;
- ensuring that innovations and changes in work processes always pursue objectives of reducing environmental impact;
- ensuring effective and transparent communication that ensures dissemination of any information that might be useful for environmental prevention purposes;
- prevention of environmental incidents;
- timely adaptation of all regulatory applicable changes and updates;
- compliance with the requirements stipulated and absolute conformity with the provisions of the current environmental regulations;
- communication of information relating to compliance with environmental issues as a key element of the sharing and solidity of the management system;
- monitoring, through a system of indicators, of 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 in environmental sustainability performance.

INFORMATION SECURITY

In the specific area of Information Security issues, Poste Italiane also undertakes to carry out its activities according to the ISO/IEC 27001 standard (with extension to ISO/IEC 27017 and ISO/IEC 27018) and in compliance with the best practices and the most advanced principles of cybersecurity, through the following principles:

- Implement the security management of the data held and processed, by means of IT tools, as well as the IT resources and processes necessary for their processing, in order to reduce - within predefined acceptable limits - the risk of breaching the confidentiality, integrity and availability thereof, with a view to safeguarding business and contributing to the fight against cybercrime events.

- Extend the above principles to the management of Cloud Computing services, both directly and through specialised providers.
- Develop, maintain and improve the internal regulatory framework for all Group employees and counterparties;
- Take all necessary actions to pursue security objectives commensurate with the degree of sensitivity of the Company Information and the criticality of the technologies that enable its processing, ensuring the following:
 - the protection of confidentiality must be implemented through appropriate measures to prevent unauthorised access to IT resources and to data stored, processed or transmitted through the use of IT resources or the uncontrolled dissemination of such data;
 - the protection of integrity must be implemented through appropriate measures to prevent unauthorised changes or damage to the physical format and/or semantic content of the data stored, processed and transmitted through the use of IT resources;
 - the protection of availability must be implemented through appropriate measures to ensure that authorised persons have access to resources in a timely manner to fulfil their mission.
- Systematically carry out analysis and management of risks impacting information security, in accordance with corporate policies and models, to identify the necessary controls to be adopted, also with reference to the continuous evolution of the external framework of cyber threats;
- Monitor at Company level the state of information security 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 the relevant records, including for judicial purposes and improvement programmes;
- Promote and implement targeted or widespread training and awareness-raising plans on information security;
- Safeguard the company's data and IT resources from the moment they are created/introduced into the company, during their use, until the moment they are destroyed/disposed of;
- Protect IT resources in relation to accidental and/or intentional events of destruction, loss, disclosure, alteration and unauthorised access.

The responsibility for and compliance with the principles of information security lies with every user of the company's IT resources and data, i.e. employees at all levels, as well as third parties who, for whatever reason, perform work activities, even temporarily, for

Group Companies (suppliers, consultants, partners). This responsibility derives from the principles of diligence and fairness, which must guide conduct in the performance of work activities.

INFORMATION SYSTEMS MANAGEMENT

In the specific area of information systems management issues, Poste Italiane also undertakes to carry out its activities according to the ISO/IEC 20000-1 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 the ongoing compliance of Information Systems with corporate security standards and the relevant regulations by implementing the corrective plans defined during the system monitoring phase.

IMPLEMENTATION, ADOPTION AND COMMUNICATION

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

The Policy is reviewed at least annually as part of the Management Systems Review, taking into account the results achieved and its effective implementation; any amendments are submitted to the Board of Directors for approval 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 human and financial resources available and are the reference for defining objectives for improving performance.

