



CODE
of **ETHICS**

WHAT IS ETHICS?

Our Code of Ethics contains all the founding values of TCI Telecomunicazioni Italia S.r.l. (hereinafter "TCI") which have allowed us to grow and evolve over time without ever losing our identity.

"Ethics" has a complex meaning: partly abstract, as a collector of good principles, and partly material as a set of good practices to be implemented to achieve what is considered right. With this Code of Ethics, TCI aims to create a shared ethical awareness and direct all its Stakeholders towards actions that transcend personal interest by virtue of the collective one.

WHO ARE THE RECIPIENTS OF OUR CODE OF ETHICS?

All the company representatives and all those who directly or indirectly, permanently or temporarily, establish relationships with TCI (hereinafter "Stakeholders").

All the Stakeholders of TCI are required to comply with and respect this Code of Ethics, which is intended as additional to the laws and regulations in force, both national and international, that in any case must be respected. This Code of Ethics is based on the intrinsic values of TCI's identity and the principles of the Universal Declaration of Human Rights, the Convention on the Rights of the Child, the ILO's international conventions and recommendations, the Global Compact and the UN 2030 Agenda.

DIFFUSION OF OUR CODE OF ETHICS

This Code of Ethics is available on our website www.tci.it.

TCI undertakes to diffuse this Code of Ethics through communication activities and to sensitise all our Stakeholders to the values contained therein.

OUR VALUES

TCI is a company that has been experiencing an exponential growth since 1982, year in which it was founded. Despite the great success and the achievement of a global dimension, we have maintained unchanged our main values, which are the essence of our identity.

QUALITY AND INNOVATION

Quality and Innovation are the pillars of TCI. Excellence and research are the engine of our growth. TCI has distinguished itself worldwide primarily thanks to these values: each product is designed to perform its function in the best and most efficient way.

It is never considered finished but in continuous evolution to adapt promptly to new market needs, to anticipate them as well as to respond to regulatory changes. In other words, we guarantee our Customers the flexibility they need to be successful now and in the future.

LOYALTY AND TRUST

Every relationship of TCI with its Stakeholders is based on mutual loyalty and trust: only thanks to these essential elements it is possible to establish and maintain solid and quality collaborations.

HONESTY AND TRANSPARENCY

TCI's relations with its Stakeholders are based on maximum transparency and clarity in order to create the best conditions for making informed decisions. TCI condemns any behavior aimed at benefitting from situations, more or less deliberate, of uncertainty and ignorance.

DIVERSITY AND INCLUSION

We believe that aggregation is a fortifying element which, if properly managed and enhanced, can turn into an important competitive advantage. Therefore, TCI promotes inclusion and respect and rejects any form of discrimination related to but not limited to, differences in age, culture, gender and sexual orientation, ethnicity, political opinion, religious belief, civil and health status.

PEOPLE CENTRALITY

TCI undertakes to develop its employees' skills and talent in compliance with equal opportunities as well as to ensure their physical and moral integrity by offering a safe and healthy work environment.

SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

In carrying out its activities, TCI places people first, whose satisfaction and growth both in personal and professional terms are the keys for the full realisation of its vision. In terms of environmental protection, we undertake to reduce our energy consumption, to promote the recycling of materials and to spread the culture of environmental responsibility inside the company.

OUR PEOPLE

STAFF SELECTION AND MANAGEMENT

People centrality is one of the core values of TCI and, as such, it represents the basis of the HR management policy at every stage. TCI adopts an impartial selection process, aimed at selecting the talents necessary for the fulfilment of its vision and mission over the long term. TCI condemns, and therefore does not undertake any form of discrimination, forced labour and child labour and guarantees a selection based on professional and psycho-aptitudinal skills, free from any favouritism. At the time of signing the contract, the resource is ensured a clear understanding of the duties and knowledge of the remuneration, in order to guarantee an informed and responsible choice.

This Code of Ethics is submitted to the resource for knowledge and acceptance. The inclusion of resources represents a moment of great importance and therefore is framed and managed carefully, respecting the necessary timelines: it is essential to flank trainees with experienced workers to ensure the correct transfer of know-how, values and business practices. All over the working lifecycle, relationships based on fairness, trust and loyalty are promoted between and with the staff. TCI undertakes to continuously guarantee a safe and healthy work environment. The importance of continuous training as a tool for increasing the value of our people results in a series of training courses made available to the staff, aimed at improving and increasing professional skills.

EQUAL OPPORTUNITIES

TCI condemns any discriminatory conduct in hiring, attributing rank and responsibilities, remunerating, as well as promoting career advancement that is linked, by way of example and not exhaustively, to race, religion, gender, sexual and political orientation, age, etc.

HEALTH AND SAFETY AT WORK

TCI constantly strives to ensure that its offices and all the carried activities comply with the health and safety standards that are required by law and takes all the necessary measures in terms of risk identification, continuous monitoring and improvement interventions. At the same time, TCI regularly brings and promotes the culture of safety also through targeted training courses. All our people are required to carry out their activities responsibly, adopting all the necessary measures aimed at limiting potential risks for themselves and for the others. Our staff is also trained on procedures for responding to emergency situations, also through extemporary simulations. TCI ensures constant and accurate cleaning of its offices. All the employees are required to comply with hygiene rules both in their workstation and in the common areas.

PROTECTION OF COMPANY ASSETS

Every employee of TCI is required to protect the company assets by engaging in responsible behaviour, in line with the procedures set up for their correct and safe use. Any improper use that may cause inefficiency or that may damage the company's image or compromise the interest of the company is forbidden.

CORRECT USE OF TELECOMMUNICATION SYSTEMS AND CONFIDENTIALITY

All the employees are required to use the telecommunication means provided by TCI for professional purposes only and always and in any case in the interest of the company. The information managed is of a confidential nature and must be managed accordingly, even after a possible termination of the employment contract. It is essential to avoid any use of telecommunication means that could compromise the security of company information or cause damages to TCI, both in substance and in form. The devices made available must be stored correctly and not given to any third parties.

CONFLICT OF INTEREST

In full respect of the private sphere, TCI invites all its persons to confidentially report to the Head of Human Resources (u.personale@tci.it) any situation that may involve a conflict of interest with the company.

WORKING HOURS, PAY AND BENEFITS

Weekly working hours are defined according to the regulations in force and any form of overtime must be voluntary and exceptional. The salary level and any benefits are defined in full compliance with the law and no form of salary deduction is performed as a disciplinary measure.

LABOUR SAFEGUARD

TCI guarantees the workers freedom of association, recognises the right to collective bargaining and maintains a constructive dialogue and a collaborative approach with the representative associations.

PRIVACY PROTECTION AND DATA PROTECTION

TCI adopts all the necessary measures in terms of privacy and data protection. Every employee is required to apply the principles of data and information confidentiality, integrity and availability.

ETICH BUSINESS

TCI's business conduct is based on integrity, reliability, transparency and legality. These are the principles that distinguish the relations we maintain with all our Stakeholders, who are called to abide by as well.

COMPLIANCE WITH LAWS AND REGULATIONS IN FORCE

TCI runs its business in full compliance with the national and international laws and regulations in force. This Code of Ethics is intended as additional to them.

FAIR COMPETITION

TCI endorses and applies the principle of free and fair competition, disapproving all the forms of abuse of a dominant position. Illegal behaviours aimed at procuring direct or indirect advantages for the company are not allowed.

CORRUPTION AND MONEY LAUNDERING

TCI does not allow any form of corruption aimed at procuring personal and/or direct and/or indirect advantages for the company and takes all the necessary measures to prevent and avoid such a circumstance. All those who carry out activities at and on behalf of TCI are not allowed to accept and/or offer gifts or favours from/to third parties that go beyond the right rules of hospitality and courtesy and during their daily activities they are required to check in advance the respectability of commercial counterparties in order to avoid any potential participation in activities that may involve money laundering.

CUSTOMER CENTRALITY AND SATISFACTION

The satisfaction of every Customer is essential for the stability and growth of our company. This is why TCI is constantly committed to maintaining a continuous and open dialogue, aimed at monitoring the degree of satisfaction towards the products and services provided and identifying possible improvement areas.

RESPONSIBLE MARKETING AND COMMUNICATION

TCI believes in the importance of a complete, transparent and responsible communication. For this reason we strive to ensure that our communication and marketing campaigns are such as to enable our Stakeholders to make informed choices. By product labeling, catalogues, data sheets, brochures, etc. TCI provides all the fundamental information for the correct and safe use of its products.

RESPONSIBLE MANAGEMENT OF SUPPLIERS

TCI is aware of its responsibility with respect to the supply chain and takes the necessary measures to ensure quality and safety of the raw materials used. In order to guarantee the total absence of forgery, purchases are made only through official distribution channels.

To ensure the stability of its supplies, TCI relies on multiple suppliers with whom it establishes long-term relationships based on mutual trust and transparency.

RELATIONS WITH INSTITUTIONS AND ASSOCIATIONS

Any relationship with the Institutions is based on fairness and transparency and takes place in full compliance with the regulations in force. TCI maintains an open, constructive and stable communication channel with the various associations representing its Stakeholders.

REPORTING OF VIOLATIONS

TCI invites every Stakeholder to report any potential conducts and practices that do not comply with the provisions contained in this Code of Ethics so that adequate intervention and correction measures can be adopted. Warnings, even anonymously, must be sent to the Head of Human Resources (u.personale@tci.it). TCI guarantees that no retaliation will follow the reports and the truthfulness of each of them will be assessed also through internal investigations. In the event of an ascertained violation of the contents of this Code of Ethics, disciplinary sanctions will be applied according to the applicable national laws, regardless of any criminal or civil proceedings that may arise.

