



RAI COM S.P.A. SUPPLIER CODE OF CONDUCT

FOR RESPONSIBLE PROCUREMENT

1. Introduction

RAI-Radiotelevisione Italiana S.p.A. (hereinafter, in short, “Rai”) is actively committed to promoting sustainable development, as defined by the 17 Sustainable Development Goals “SDGs”¹ of the United Nations 2030 Agenda, and is aware that this commitment can be further strengthened by engaging in collaboration processes with stakeholders that lead to the creation of shared value.

With this in mind, Rai has established high standards of business conduct, defined in its Code of Ethics, which it also requires all parties with which it interacts, in various guises, to respect.

With the communication dated 09/09/2025 (ref. AD/2025/0003516/P/C), Rai notified Rai Com S.p.A. (hereinafter, in short, "Rai Com") of the introduction of the Rai Supplier Code of Conduct, included as an annex to the Code of Ethics.

Rai Com, within the scope of its corporate autonomy and taking into account its specific business, procedural and contractual requirements, hereby adopts Rai Com S.p.A.'s Supplier Code of Conduct (hereinafter also known as the "Code of Conduct"), which supplements the Code of Ethics and represents the operational interpretation of the Rai Supplier Code of Conduct for Rai Com itself. As indicated in more detail below, this code governs relationships with its Suppliers.

Rai Com, in line with Rai’s practice, addresses its Suppliers (as defined below) with the aim of clarifying its expectations regarding certain fundamental issues of responsibility that affect different, yet equally crucial, areas of procurement processes: human rights and working conditions, environmental protection, digital sustainability, business ethics, and the prevention of and fight against corruption.

Rai Com therefore requires its Suppliers to share the principles underlying this Code of Conduct and to commit to applying them as a basis for a relationship of mutual trust, and in turn to disseminate and promote them also among their own employees, suppliers and sub-suppliers.

Without prejudice to compliance with the specific regulatory requirements of each jurisdiction, the Code of Conduct is valid both in Italy and abroad, with any adjustments that may be necessary or appropriate based on the different circumstances of the countries in which Rai Com operates.

This Code of Conduct is aimed to all entities, regardless of their legal form, that carry out business activities and hold/intend to hold contractual relationships with Rai Com for the implementation of works and/or the supply of goods and/or the performance of services (hereinafter, collectively, "Suppliers").

2. Rules of Conduct

The rules of conduct that Suppliers are required to comply with are represented below through four cross-sectional themed areas:

- Human Rights and Labour;
- Environment;
- Digital Sustainability;
- Ethics and Anti-Corruption.

¹ For a complete view of the SDGs, see <https://www.un.org/sustainabledevelopment/>

Suppliers actively undertake to contribute to the pursuit of the Rai Group's sustainability goals and to share qualitative and/or quantitative information concerning environmental, social and governance aspects, which are also essential for the preparation of Rai's consolidated sustainability reporting pursuant to Italian Legislative Decree 125/2024 and EU Delegated Regulation 2023/2772.

HUMAN RIGHTS AND LABOUR

Suppliers undertake to comply with all applicable national and international laws and regulations on human rights and working conditions, including the Fundamental Convention of the International Labour Organisation (ILO), the UN Universal Declaration of Human Rights, and the rules and standards of their respective sectors. To this end, Suppliers undertake to adopt, in line with applicable regulations and with tools appropriate to their organisational structure, internal mechanisms that enable their employees to report actual or suspected human rights violations.

With this Code of Conduct, Rai Com promotes the adoption of ethical standards of conduct by Suppliers and the achievement of certifications recognised by accredited bodies, such as, by way of example but without limitation, corporate social responsibility certifications (e.g. SA8000).

Diversity and Equal Opportunities

Suppliers are committed to promoting equal opportunities in line with Rai's commitment to protecting inclusion among all people by combating all forms of discrimination, both direct and indirect, based on gender, respecting the cultural and professional dignity of each person, sexual orientation and gender identity, age, state of health, disability, ethnic origin, personal and social conditions, political and trade union opinions, religion or language.

Personal Integrity

Suppliers are committed to providing working conditions that respect individual dignity and must not tolerate any form of physical or psychological abuse: harassment, inhuman or humiliating treatment, threats, and any other form of intimidation.

Workers' Rights

Suppliers undertake:

- not to use or tolerate undeclared or irregular labour, as well as any form of child labour other than regulated labour;
- to provide safe and healthy working environments and comply with all health and safety regulations, performing appropriate controls and applying technical protection measures, including through the dissemination of a culture of safety and risk awareness, aimed at encouraging responsible behaviour by all. In this respect, Rai Com promotes the adoption of worker health and safety standards by its Suppliers and the achievement of certifications recognised by accredited bodies such as, by way of example but without limitation, ISO 45001;
- to apply, where compulsory or otherwise possible, collective bargaining agreements signed by the main trade unions or agreements providing equivalent protection. In any case, Suppliers are required to guarantee their workers the right to form and join trade unions of their choice;
- to comply with national laws governing employment relationships as well as applicable industry standards, particularly in regard to working hours, holidays and public holidays and, in the case of smartworking or teleworking, guarantee their workers the right to disconnect from work and protect their right to rest.

Respect and Development of People

Suppliers are committed to protecting the value of their human resources, including through the development of technical and professional skills and other appropriate tools compatible with their specific context and corporate structure.

ENVIRONMENT

Suppliers undertake to pay particular attention to environmental protection, minimising the impact of their activities with appropriate solutions, in line with their specific circumstances, for example through:

- the efficient use of natural resources, paying particular attention to limiting their consumption;
- the preferential use of energy from renewable sources;
- the proper disposal of waste;
- the minimisation of emissions into the air, water and soil. In any case, all substances that have potential harmful effects on human health and/or the environment must be properly managed, measured, controlled and treated before their release;
- the mitigation of impacts on biodiversity and ecosystems;

In this context, Suppliers are encouraged to:

- set targets to reduce their ecological footprint in order to align with the targets set by the Paris Climate Agreement²;
- adopt measurement methods to determine their ecological footprint associated with each unit of product/service supplied or work performed;
- consider environmental protection a fundamental aspect also in driving research and innovation towards new design, processing and material recovery methods

With this in mind, Rai Com promotes the adoption of environmental standards by its Suppliers, and the achievement of certifications recognised by accredited bodies relating to the adoption of environmental management systems (e.g. ISO 14001 certification and EMAS registration) and energy management systems (ISO 50001 certification), as well as the adoption of tools for measuring the environmental impact associated with the product/service offered and related certifications (e.g. Life Cycle Assessment of products, ISO 14064 certification).

DIGITAL SUSTAINABILITY

Digital sustainability refers to the sustainable development of digital technology as well as its adoption as a tool for positively contributing to the environment, the economy and society. "In this dual role, digital sustainability therefore concerns the interactions between digitalisation and digital transformation with respect to environmental, economic and social sustainability"³.

With this in mind, Rai Com also intends to ensure global health and well-being through inclusive digital transformation projects and by providing staff with appropriate training on the principles of

² For more details, see the following link [Paris Agreement on Climate Change -Consilium \(europa.eu\)](https://european-council.europa.eu/media/en/press-articles/2016/12/22/P122216en16001.pdf)

³ UNI/PdR 147:2023 "Digital sustainability - Requirements and indicators for innovation processes"

sustainability, including digital. More generally, Rai Com is committed to orienting its technological development towards a more socially responsible perspective that promotes the role of digital technology as a tool and lever for building sustainable development models, in line with the goals of the 2030 Agenda.

In this respect, Rai Com encourages Suppliers to adopt equally sensitive conduct regarding digital sustainability, paying particular attention to the energy efficiency of their equipment, especially their IT infrastructures, and adopting monitoring mechanisms aimed at continuous improvement in this area.

ETHICS AND ANTI-CORRUPTION

Rai Com, believing it essential to uphold the ethical principles that guide its operations, requires its Suppliers to comply with the following rules of conduct.

Integrity and Transparency

Maintain irreproachable conduct, acting diligently and in good faith and honouring their commitments, ensuring truthfulness of information, transparent action and full credibility.

Regulatory Compliance

Comply with all applicable primary and secondary legislation, as well as the laws and regulations in force in the countries in which activities are carried out on behalf of Rai Com, Rai Com's corporate procedures and internal regulations covering relationships with third parties, the Code of Ethics, the MOGC231 Organizational, Management and Control Model, the Rai Com PTPC (Three-Year Corruption Prevention Plan), and other company policies.

Professionalism

Carry out all activities with commitment and professional rigour with a focus on quality and in a spirit of mutual respect and cooperation.

Information Security and Confidentiality

Safeguard the security and confidentiality of company information and any personal data processed.

Suppliers undertake to treat with the utmost confidentiality any confidential data and information that they become aware of in connection with the negotiation, finalisation and execution of contracts entered into with Rai Com, and not to disclose or communicate in any way, in whole or in part, such data and information to anyone without the prior express consent of Rai Com.

Protection of Rai Com's Corporate Assets

Rai Com's corporate assets consist of both tangible and intangible assets; the latter include, by way of example, corporate information, know-how, and technical expertise as well as, more broadly, Rai Com's reputation among stakeholders and, more generally, among the entire civil, social and economic context in which it operates. Company assets must be used in compliance with current legislation and with the principles of integrity, transparency and honesty.

To this end, each Supplier is responsible for protecting any Rai Com assets entrusted to them and is required to refrain from improper or incorrect use.

Each Supplier is responsible for the proper use of any IT resources assigned to them by Rai Com as well as any access codes to Rai Com's systems.

Fair Competition

Suppliers undertake to comply with both EU and national competition law, refraining from anti-competitive or otherwise unethical conduct that violates competition rules.

Suppliers are encouraged to uphold the value of fair competition, refraining from collusive behaviour and taking care not to facilitate the creation or maintenance of dominant positions or the economic dependence of contractual partners.

Product/Service Traceability

The goods and services offered by Suppliers must comply with national and international laws and standards on quality and safety and conform to the stated descriptions. Rai Com requires its Suppliers to pay the utmost attention to the traceability of materials, components and products used throughout the entire supply chain.

Conflict of Interest Prevention

Suppliers undertake to promptly report any potential conflict of interest situations that may arise in contract award procedures, procurement procedures and in general in business interactions with Rai.

A conflict of interest, regardless of its intensity (apparent, potential or actual) occurs in all cases where Suppliers, in performing services for Rai Com, simultaneously have a related private interest in the same area, capable of interfering with and altering the decision-making process and/or the outcome of the activity.

Corruption Prevention

Suppliers must neither practise nor tolerate any form of corruption, either generally within their own activities or specifically in their relationships with Rai Com.

Suppliers are required to refrain from any direct or indirect offer or promise of money or other financial or non-financial benefits, including gratuities, gifts, gadgets and benefits that exceed normal courtesy and could be interpreted as being intended to exert undue influence or obtain preferential treatment or improper advantages. In any case, such benefits must be limited to modest value as indicated in more detail in the Rai Code of Ethics.

In particular, Suppliers undertake to report to Rai Com any attempted disturbance, irregularity or distortion and/or attempts at corruption against the company, its representatives or employees, both in the preliminary stages of contract negotiation and formalisation and during the contract execution, by any interested party, employee or anyone in a position to influence decisions and behaviours related to Rai Com's decision-making and commercial processes.

Rai Com promotes the adoption of corruption prevention systems by its Suppliers, along with the achievement of certifications such as, for example, UNI ISO 37001 certification.

Economic Responsibility

Suppliers, both within their relationships with Rai Com and in their own activities in general, including in their relationships with third parties, must comply with all applicable national and international laws regarding accounting, taxation and transparency and must refrain from any form of circumvention of such regulations, as well as from any form of money laundering or self-laundering or other similar unlawful conduct.

3. Final Provisions

Rai Com reserves the right to periodically revise this Code of Conduct, including amendments based on legislative and/or regulatory developments, as well as taking into account any development requests from stakeholders.