Note for the Record no. 03/16



English translation of the document Nota agli Atti n. 03/16.

In case of doubt, the italian-language original should be consulted as the authoritative text.

Settimo Milanese, 22 November 2016

Subject: Purchasing Policy

The Italtel Purchasing Policy aims to ensure the availability of products and services to all Group companies, which meet the demands of quality, cost, time and reliability, operating with suppliers that share the respect of people, the protection of environment and the principles of honesty and integrity as enshrined in the Italtel's Code of Ethics.

All Italtel Group Companies carrying out the activities of Purchase must therefore:

- comply with all laws, applicable regulations, the appropriate Labor Practices and Human Rights regulating any local and global companies
- promote Sustainable Purchase activities in order to reduce the environmental impact during the selection and procurement of products and services from suppliers
- promoting suppliers who adopt management practices in compliance with the Health
 and Safety of its workers and guaranteeing them a high level of protection
- giving all suppliers Equal Opportunities to operate with Italtel Group: promoting procurement activities based on understanding and mutual trust with suppliers

Suppliers selection and the transactions execution shall be done, given priority to companies that satisfy the following criteria:

- they comply with laws and regulations related to Corporate Social Responsibility
 (CSR) and place emphasis on respect of human rights and environmental care
- they have in their core business the activities object of the transaction
- they have an organization and tangible/intangible assets in adequate quality and quantity in relation to the type and size of the supply to be carried out and assuring quality, prices and appropriate delivery
- they are able to guarantee the required level of quality from time to time required



- they are able to guarantee stability and continuity of supply of goods and / or services
 in time, also by means of formalized emergency plan, and to have the flexibility to
 respond quickly to the market demand / supply fluctuations
- they provide fair and competitive prices compared to the market in which they operate and Italtel's developed projects
- they adhere to the the terms and the standard payment conditions established by Italtel
- they possess technology that contributes positively to Italtel Group products/solutions
- they ensure compliance with the prevailing laws and regulations in the countries and/or regions in which they operate including: anti-trust laws, commercial codes, subcontractor regulations, foreign exchange laws, personal privacy laws
- they respect the ethics of trade relations and not engage in practices that can influence decisions such as: gifts, bribes, financial or non-financial benefits or benefits of any kind which constitute a corrupt or illegal practice

The Company Management undertakes to notify the concerned policy to all the involved personnel of all the Group's companies and to external stakeholders and to constantly check the achievement of its objectives.

ITALTEL S.p.A. - Chief Executive Officer (Stefano PILERI)