

Donations and Sponsorship Policy

1. Introduction

- 1.1 This policy on donations and sponsorships (the **Policy**) adopted by the board of directors (the **Board of Directors**) of Digi Communications N.V. (the **Company**) on 13 March 2023, establishes the internal general framework of donations and sponsorships for the Company and its subsidiaries (jointly **DIGI Group** or the **Group**), in the context of the Group's compliance framework consisting of, inter alia, the Code of Conduct, the Policy on Anti-Corruption and Business Ethics, the Policy on the Personnel Conflict of Interest, and the Policy on the Anti-Money Laundering.
- 1.2 Donations and sponsorships of the DIGI Group shall be made on lawful, transparent, and objective conditions. DIGI Group has zero tolerance for any form of bribery, corruption, fraud, or other actions that are contrary to its principles and values of business ethics and integrity.
- 1.3 For DIGI Group, involvement in social and environmental responsibility projects, in compliance with the provisions set by the legislation of the countries in which the Group operates, and according to this framework (approved by the Company), stands for its duty to the civil society. Through its sponsorships and donations, DIGI Group is committed to making a real contribution to improving the quality of life in the community to which it belongs.

2. Scope

- 2.1 This Policy applies to DIGI Group, all members of the Boards of Directors, its directors, and employees with leading or executive positions, who are involved in the process of approving donations and sponsorships (the **Personnel**).
- 2.2 The Personnel who have a personal interest in approving a donation or sponsorship must not be involved in the process of selecting, analysing, decision-making and approving that donation or sponsorship. The Personnel who have such a personal interest are obliged to communicate the conflict of interest to their immediate superior requesting to be replaced or, in the case of a member of Board of Directors, he/she must refrain from taking part in the decision-making process and refrain from voting upon the approval if the conflict of interest cannot be removed.

3. General Principles

- 3.1 Donation is a bilateral legal act concluded in authentic form, by which a party, with the intention of gratification, irrevocably disposes of a good in favour of the other party.
- 3.2 Sponsorship is a bilateral legal act, by which two persons agree to transfer the ownership of tangible

assets or financial means in order to support non-profit activities carried out by the beneficiary of the sponsorship.

- 3.3 Although DIGI Group can make corporate donations or sponsorships as business decisions, for the purpose of associating the Group with an event, project or program, the Personnel, acting as individuals, are not authorized to make donations or sponsorships on behalf of the Group.
- 3.4 DIGI Group can make donations and sponsorships only in accordance with the provisions of applicable law and such donations and sponsorships must never be associated with an unlawful act or unfair advantage to DIGI Group.

4. Acceptable Donations and Sponsorships

- 4.1 DIGI Group can make donations or sponsorships to non-profit legal entities in the countries in which it carries its operations (available at www.digi-communications.en), and whose values and missions coincide with its values and principles, in the areas and in compliance with the specific legislation of each state in which the Group operates. Such donations and sponsorships must never be associated with an unlawful act or unfair advantage to DIGI Group.

5. Unacceptable Donations and Sponsorships

- 5.1 Donations and sponsorships to political parties, political organizations, and candidates in the electoral process, civil servants or persons elected/appointed to public office, public institutions, and authorities are strictly prohibited.
- 5.2 DIGI Group does not make donations or sponsorships to individuals. However, in exceptional circumstances and if the law allows, the Group may decide, to donate to such an individual.
- 5.3 DIGI Group does not approve donations or sponsorships that may adversely affect its image or reputation, or conflict with its values, goals, and principles of integrity and business ethics as the Group assumed in its Code of Conduct available at www.digi-communications.ro.

6. Eligibility Criteria for Donations and Sponsorships

- 6.1 Donations and sponsorships are selected based on the following criteria, detailed in the internal working procedures:
 - *Transparency*: The beneficiary of the donation or sponsorship must be known, and the purpose must be disclosed and verifiable, in accordance with the request submitted to DIGI Group.

- *Purpose*: The request of a donation or sponsorship to be made by DIGI Group must contribute to a purpose and areas permitted by the applicable law.
- *Beneficiary's Eligibility*: Eligibility must be established subject to the documents and statements submitted by the beneficiary.
- *Strategic Framework*: The concerned donation or sponsorship must align with the values and strategic objectives of the Group. The gravity and urgency of the situation that generates the request may lead the Group to prioritize the request.
- *Cost*: The cost incurred by the Group for making the donation or sponsorship must be well defined and justified.
- *Previous relationships with the Group*: The previous experience with a potential beneficiary of the donation or sponsorship may influence the approval of a new request.
- *Validity*: The criteria must be applied by each subsidiary of the Group subject to the internal procedures.

7. Approval of Donations and Sponsorships

- 7.1 In applying this Policy, each subsidiary of DIGI Group shall adopt its own internal procedure for approving donations and sponsorships in accordance with the principles of the present Policy and the specific provisions of local law.
- 7.2 The following general rules in the process of approving donations and sponsorships shall apply to the entire Group:
- the request for donation or sponsorship must be submitted to csr@digicomunications.ro (or to other dedicated addresses settled by the Company's subsidiaries, if available);
 - the donation or sponsorship must be finally approved by the board of directors or the general manager of the Company or the Group's subsidiary; and
 - a donation or sponsorship agreement must be concluded.

8. Corruption and Money Laundry Prevention

- 8.1 Through this Policy, DIGI Group establishes guidelines for its Personnel to comply with key anti-corruption provisions pursuant to the approval of a donation or sponsorship.
- 8.2 This Policy is applied in the context of DIGI Group's commitment to business ethics and integrity, together with the Company's Code of Conduct, and its approved policies on anti-corruption and

business ethics, prevention of money laundering and conflict of interest.

- 8.3 Donations and sponsorships authorized by DIGI Group must not be used as a means of hiding the payment of a bribe or undue benefits or money laundry, nor for the purpose of misappropriating funds or evading the tax obligations or concealing the origin/destination of funds. Therefore, all the donations and sponsorships approved by DIGI Group must be transparent and documented.
- 8.4 In order to ensure the reciprocity of the standard of ethics and business integrity, upon receipt of a request for donation or sponsorship, DIGI Group must require all its potential beneficiaries of donations or sponsorships to undertake a similar commitment to DIGI Group, i.e. to comply with the applicable law on anti-corruption and money laundry prevention.

9. Monitoring

- 9.1 Internal Audit will carry out audits missions to verify the correct implementation of this Policy.
- 9.2 The Company's Communication & CSR Department will monitor the deployment of this Policy by considering organizational changes, the need to align with legislative changes, good practices issued in the field or possible violations or deficiencies identified through its activities or through internal audit reports.
- 9.3 The relevant departments within the Group's subsidiaries are responsible for implementing this Policy in case of the requests regarding the donations and sponsorships. The requests for donations and sponsorships may be sent to csr@digicomunications.ro (or to other dedicated addresses settled by the Company's subsidiaries, if available).
- 9.4 Any notice regarding the infringement of this Policy must be settled in compliance with DIGI Group's Whistleblower Policy and the follow-up procedures.
- 9.5 Any question regarding the principles set out in this Policy may be addressed to DIGI Compliance Group (grup.conformitate@digicomunications.ro).