

NON-RETALIATION POLICY

1. Introduction

- 1.1. Digi Communications N.V. (the *Company or DIGI*) and its subsidiaries (*DIGI Group*) recognize that it is important to identify and solve any legal and ethical concerns that might arise in relation to the business activity of DIGI Group as soon as possible. Therefore, DIGI Group is committed to maintain and promote a work environment where employees or other stakeholders feel safe to communicate openly and honestly – raising questions or expressing concerns at any time without fear of retaliation.

2. Scope

- 2.1. This non-retaliation policy (the *Policy*) is applicable to all of DIGI Group's employees, officers, directors, and contractors of DIGI Group hereinafter referred to *Personnel*, business partners, shareholders and any other stakeholders of Digi Group as detailed in the Whistleblowing Policy, collectively referred to as Whistleblowers.

3. Definition of retaliation

- 3.1. Retaliation is an act of reprisal against a Whistleblower for raising a good faith concern of suspected or actual misconduct through the reporting channels or for the cooperation in an investigation of misconduct. Such reprisal may include intimidation, retaliation, coercion, threats, dismissal or any other disciplinary or discrimination action that is causally related to the reporting made under the Whistleblowing Policy.
- 3.2. Acts of reprisal directed not only against the Whistleblower who accesses or interacts with the reporting mechanism, but also against his family members, friends or colleagues may be considered retaliation, provided that the retaliation is the consequence of the Whistleblower's reporting.

4. Prohibition against retaliation

- 4.1. In consideration of the law, DIGI Group strictly prohibits retaliation against any Whistleblower for reporting misconduct in good faith about which the Whistleblower believes to be a wrongful or unlawful activity, or for participating in an investigation or proceeding related to such activity.
- 4.2. DIGI Group treats any potential harassment, intimidation, discrimination or retaliation in any form or manner against genuine Whistleblowers with seriousness and will consider such action as significant misconduct, which if proven, in respect to an employee, may lead to disciplinary actions, including dismissals.
- 4.3. DIGI Group also expects its business partners to prohibit any form of retaliation against its employees as set out at point 3.

5. Reporting incidents

- 5.1. If a Whistleblower believes that he or she has been subject to retaliation for participating in a process covered by the Whistleblowing Policy, or has witnessed or is aware of retaliation

against another person, he or she must report the incident following the Whistleblowing Policy's provisions, by using the reporting channels indicated therein.

- 5.2. DIGI Group guarantees the confidentiality of the reports made under this Policy. Reports of alleged retaliation can be made anonymously, however, anonymity may limit the ability to fully and thoroughly investigate a report.
- 5.3. The provisions of the Whistleblowing Policy are applied accordingly.

6. Remedial actions

- 6.1. Appropriate sanctions and/or remedial actions will be implemented for substantiated instances of retaliation, which in respect to employees may lead to disciplinary actions, up to and including termination of employment, in accordance with applicable labor laws.
- 6.2. As in the case of the reported concerns, DIGI Group will respond to each report individually, seeking to identify individualized solutions to each reported situation.

7. Training and communication

- 7.1. Personnel will be kept informed and trained on a regular basis on the provisions of this Policy by the Compliance Officer or local Compliance Department/ responsible of DIGI Group (or any other department/ employee appointed in this regard).

8. Entering into effect and amendments

- 8.1. The Compliance Officer of DIGI Group is responsible for the implementation, revision and interpretation of this Policy.
- 8.2. The Policy has been adopted by the board of directors of the Company (the **Board**). The Board may amend and may allow deviations from this Policy.
- 8.3. The Policy enters into effect on 21 June 2023.

9. Other Information

- 9.1. Any question regarding the principles presented in this Policy may be addressed to DIGI Compliance Group (grup.conformitate@digicomunications.ro).
