

A NETWORK MADE OF



**SUSTAINABILITY
REPORT
2019**



LETTER TO STAKEHOLDERS

GRI 102-14*



Dear Readers,

Our Sustainability Report is being published during an unprecedented global health crisis. The state of emergency we are facing around the world is imposing radical change within our everyday lives and requiring that we collectively seek new ways to work, learn, socialize and communicate.

At the same time, this experience is providing a unique opportunity to reflect deeply on what really matters in defining and in fulfilling our lives. Technology is providing a powerful tool for eliminating distances while, at the same time, uniting our efforts. Indeed, empowering capabilities and enabling the Country's social and economic development will be essential for managing the present challenges and for crafting the right strategies for the future.

In particular, the advance of technologies in telecommunications has revolutionized the way we live, learn and work, and has played a crucial role in managing the present uncertainties. As we chart the future, 'connecting' through telecommunication platforms will continue to be defining for 1) building more inclusive education, health and welfare systems, 2) enabling new innovations for growth in our businesses and society as a whole, 3) supporting the digital transformation of skills within our Country, and 4) making our lives simpler and safer and our environment far more sustainable.

And while we cannot ignore the fragile realities and imbalances that have emerged during this emergency, our collective response has led to a

renewed spirit of sharing and cooperation, which is vital for the creation of a more equitable, inclusive and sustainable society.

Today, WINDTRE operates the main mobile network in Italy in terms of both supported traffic and access capacity, and we have focused our daily efforts in building a modernized network and coherent IT systems that have simply made an important difference in the lives of our customers and of our people.

Partnering with universities, government institutions and industry, we will continue working to provide the most effective, innovative and reliable solutions for the vertical industries of healthcare, education, agriculture and security, etc.

The results presented here share the story of our journey and the ambitious goals we have achieved as a team, and with our partners, to 1) integrate and modernize our network and systems, 2) develop innovative and affordable solutions for our clients, and 3) implement comprehensive programs for reskilling our people.

We are committed to building a future that is inclusive, responsible, and sustainable. Working together with courage and trust, we are fully committed to enabling and empowering the most important network of all: our customers and our people.

Enjoy your reading,

Jeffrey Hedberg
Wind Tre S.p.A. C.E.O.

**Throughout the text of the report, reference to the GRI (Global Reporting Initiative) standards applied has been inserted. For more details on the approach adopted, please refer to the Appendix.*

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WINDTRE is at the top of the mobile market and one of the main alternative fixed operators in Italy. The new 'Top Quality Network', the result of significant investments with approximately 20,000 '5G ready' transmission sites, will support the modernization of the country and the implementation of the most innovative ICT services, to the advantage of families and business. The company, that until 6 March 2020 operated on the market with distinct commercial brands, places correctness, customer assistance and the possibility of feedback and verification in the use of the service at the center of its proposal.





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People are at the center of WINDTRE project. The company’s success is closely linked to the ability to respond to the ongoing cultural transition with concrete actions. The continuous development of skills, starting with the new digital skills, the pursuit of the best talents, and a focus upon individual well-being both inside and outside the workplace are all areas of intervention that make the difference.



An all-round range of services offered to employees and their families, for a 360° focus on the well-being of our people.



For developing new skills and preparing the **leaders of the future.**



Rewarding **excellence in the field of human resources management.**



With an induction and onboarding program that always starts at a **WINDTRE store.**



That proved all its potential during the COVID-19 emergency.



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The digital revolution is radically changing the way we live, work and relate to each other. Aware of the important acceleration that ICT solutions can bring about in social, cultural, environmental and economic processes, together with our stakeholders we have defined 4 broad working areas in support of the 2030 Agenda.



N. Mobile Broadband users in the world, end 2019: 6bn and 380mn (+ 690% since 2010).



Ultra-broadband will be the **fundamental enabler** of the digital transformation.



In Italy, in 2019 only, investments in network infrastructure have been equal to **8.4bn euros.**

OUR CONTRIBUTION TO THE 2030 AGENDA

Digital innovation for the SDGs: the program promoted by WINDTRE for designing jointly the scenario for the initiatives in support of the 2030 Agenda.

4 working areas defined together with our stakeholders:
EDUCATION | LIFE | RESPONSIBILITY | INCLUSION

EDUCATION



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In an increasingly connected world, in which the boundaries between the physical and digital dimensions are becoming progressively blurred, we need to maximize the educational potential of new technologies and teach the skills that everyone will need, starting from the youngest, in order to prepare them to face a world that digital technologies are deeply transforming.

NEO CONNESSI

Our project to assist families and teachers in the delicate moment when kids learn to navigate the Web, which involved **3,750 classes** throughout Italy in 2019.

ON STAGE, FOR THE FUTURE TALENTS

An internship program unique in its kind for raising future talents; a program that makes the **interns themselves the protagonists of the training process.**

WINDTRE ACADEMY TOUCH 5G EXPERIENCE

WINDTRE in collaboration with the Career Service of Politecnico di Milano **for an orientation course on the professions of the future.** The program offers engineering graduates the opportunity to gain the managerial and professional skills they'll need within the context of the new scenarios that will be arising with 5G technology.

THE "STARTUP FACTORY", TOGETHER WITH LUISS

LUISS EnLabs: WINDTRE collaborates with LUISS university for **one of the largest business accelerators in Europe**, that seven years after its launch has a portfolio of **65 start-ups that have collectively raised over € 60 million in funds.**



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Our commitment to protect the environment and health, by reducing our environmental impact, starting with the CO₂ emissions generated by our network, and enabling smart and sustainable cities through digital innovation.

LESS CO₂ -190 thousand tons. thanks to energy efficiency

More than 190 thousand tons of CO₂ emissions avoided thanks to the **energy efficiency measures** implemented since 2011.

TOGETHER WITH WWF for the Mediterranean and the climate

Generazione Mare: together with the WWF for protecting the Mediterranean Sea.

LESS EMISSIONS by unit of traffic

From 2017 to 2019 we have **decreased** our **emissions per traffic unit by more than half.**

SMART CITY, SMART LIFE

Smart city, smart life: our contribution to making **cities more sustainable.**

LESS DISPOSABLE PLASTIC

With the **"Less Plastic Company"** campaign we have reduced the unnecessary plastic in our offices by **over 520 thousand bottles** and almost **one million disposable plastic cups per year.**

RE SPON SIBILI TY



	80
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The tools to guarantee a correct and efficient Corporate Governance system and ensure that all the company’s activities are carried out with integrity, in a professional and fair way, maintaining high ethical standards and respecting local and international regulations.



Our **integrated management system** regarding quality, environment, safety, social responsibility and IT security certifications.



Respect for the rules and transparency. Fighting against corruption; due diligence; whistleblowing; transparency in institutional relations.



Data protection above all: the tools for ensuring privacy and data security policies are a priority for WINDTRE.



Nearly **€ 10 million** invested in data and system security in 2019.

INC LUS ION



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Digital technologies are an extraordinary inclusion opportunity for the most disadvantaged people. They are also a means of guaranteeing equal access regardless of gender, race, age, disability, or status. This is also why WINDTRE works to combat the Digital Divide and to spread the culture of inclusion.



A space to promote awareness of the issues of disability and supporting technologies, managed by our **Disability Manager**.



We are stronger together: **charity initiatives** together with our clients and all our employees.



Bollate Prison: **rejoining society** together with Bee4. 21 prisoners and 4 staff members work with us with the ultimate goal of making prison a more inclusive re-educational place.

WINDTRE THE

NET

WVO

RK

THAT
BRINGS
US CLOSER

2016

Wind and H3G merger
(50 - 50 J.V.)

2018

CK Hutchison becomes
single shareholder
of Wind Tre S.p.A.

2020

The new
single brand
WINDTRE is born

Wind Tre S.p.A. was established on 31 December 2016 from the merger between Wind Group, made up of Wind Telecomunicazioni S.p.A. and Wind Retail S.r.l., which belonged to the company VimpelCom Ltd (now VEON), and H3G Group, made up of H3G S.p.A. and 3Lettronica Industriale S.p.A., which belonged to the company CK Hutchison Holdings Ltd, a multinational conglomerate with main operational headquarters in Hong Kong [GRI 102-1](#).

The agreement is one of the most important merger operations place in our country in recent years. In addition to contributing to the country's growth, thanks to 6 billion Euros in five years in digital infrastructure investments, it also allowed the company to assume the size and efficiency necessary to offer increasingly fast, reliable and innovative telecommunication services, with 5G ready technology, at competitive prices. [GRI 102-10](#)

NETWORK

In July of 2018, CK Hutchison announced that an agreement had been reached for the purchase of VEON's entire stake in Wind Tre S.p.A.: a transaction which, once approved by the European Commission, would lead the company to officially become Wind Tre S.p.A.'s sole shareholder in September of that year.

On March 6, 2020, the new unified brand of **WINDTRE** was born, which consolidated the service provider's value positioning.

The company, which operates through the commercial brands "WINDTRE" and "WINDTRE BUSINESS", has now become a leading player on Italy's landline and mobile telecommunications market, offering both voice and data services [GRI 102-2](#). Combined with other major investments, the integration of the two networks guarantees, and will continue to guarantee, an advanced quality network for customers, while at the same time accelerating the development of increasingly advanced mobile broadband and landline services [GRI 102-4](#).

WINDTRE's goal is to expedite the modernisation of the Country through the development of network infrastructures and the provision of technological and digital solutions, offering efficient services capable of connecting the entire Country and supporting the most innovative ICT services.

The new WINDTRE "Top Quality"¹ network is the result of major investments in transformation and consolidation, with approximately 20,000 '5G ready' that will allow a quick implementation of the fifth-generation standard, to the advantage of families and business.

¹ measures taken by the independent company Umlaut in Italy from October to December 2019. The tests carried out measured the quality of the mobile voice and data service.



TECHNOLOGY AND COVERAGE

GRI 103-1, 103-2 e 103-3

The establishment of a reliable and extensive network is necessary for the provision of all the fixed and mobile telecommunications services and makes a significant contribution to the perception of service quality on the part of the clientele.

Following the merger of Wind and H3G, WINDTRE committed itself to the gradual integration of their respective mobile network infrastructures, a process that was completed nationwide at the end of 2019. The new infrastructures offer considerable advantages for both private and business customers alike: a significant **increase in 4.5G DL speed has been recorded, with a value that has more than tripled compared to pre-integration value, and with a significant improvement in coverage as well, especially in indoor environments** [GRI 203-1 b e c.](#)

Meanwhile, in collaboration with several partners, WINDTRE is also strongly committed to the **development of 5G technology**, which will allow for faster and more reliable data transmission speeds than those which are currently possible, thus allowing for the large number of connections between devices necessary for the growth of the Internet of Things.

The network performance targets are established in such a way as to guarantee high standards of service, and to meet the predictable traffic expectations; the network is monitored by a constantly active NOC (**Network Operation Centre**).

The **WINDTRE mobile network’s outdoor coverage it’s close to 100%** of the population, with the respective figures being 99.9% for 2G (GSM), 99% for 3G (UMTS/HSPA), and 99.5% for 4G (LTE). During the course of 2019, WINDTRE proceeded with the development of its 4G LTE technology towards **4.5G**, making use of the 800 MHz, 1800 MHz and 2600MHz band frequencies, and even activated LTE on a portion of the 2100MHz frequencies. In order to meet the high demand for data traffic, WINDTRE has focused its efforts upon expanding its LTE coverage in order to cover larger areas and increase the network capacity offered to its customers. The company decided to invest approximately € 360 million in this solution in order to improve the quality of its mobile network, and to simultaneously obtain benefits in terms of reduced energy consumption.

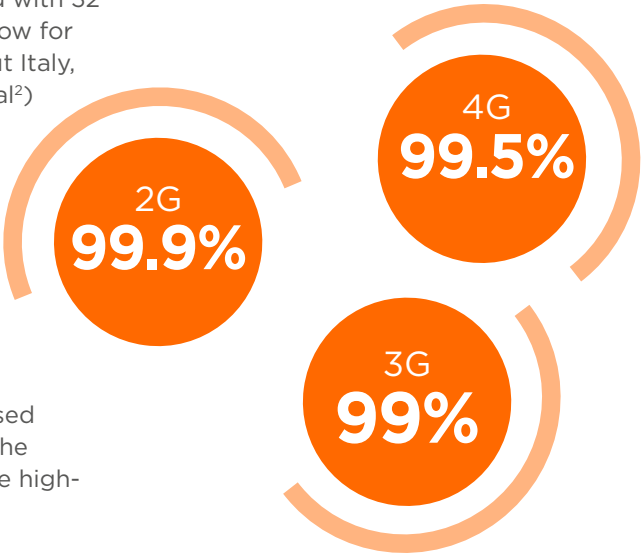
Overall, within the context of the network’s modernisation and consolidation, over € 1 billion was invested in technological infrastructures in 2019 alone.

² WLR, an acronym of Wholesale Line Rental, is a service that the network’s owner, Telecom Italia, offers to operators who want to offer traditional telephone lines to their customers while entirely managing the commercial aspects with their own brand name.
³ Ethernet is a family of computer networking technologies commonly used in Local Area Networks (LAN), Metropolitan Area Networks (MAN), and Wide Area Networks (WAN).

Outdoor mobile network (as of 31 December 2019)	2G (GSM)	3G (UMTS/ HSPA)	4G (LTE)
Population coverage level	99.9%	99.0%	99.5%

In terms of its **landline network**, WINDTRE is currently capable of offering “the last mile” for connections to direct subscribers at nearly 2,000 sites, with a capacity of approximately 3.5 million lines, and is interconnected with 32 GW IPs on the TIM network, which allow for “indirect” Carrier Selection throughout Italy, as well as WLR (Wholesale Line Rental²) and BS Ethernet³ services. In 2015, WINDTRE began investing in fibre optics and, using **Fibre To The Cabinet** (FTTC) and **Fibre To The Home** (FTTH) technologies, activated ultra-broadband services that reached approximately 80% of the Italian population by the end of 2019. With regard to the transmission network used for the landline and mobile services, the company is capable of handling all the high-

speed fibre optic backbone network’s traffic through its own infrastructures.



The extension of FTTH – Fibre To The Home – services

During the course of 2019, in addition to Milan, Turin, Bologna, Perugia, Venice, Padua, Naples, Bari, Catania, Cagliari, Genoa and Palermo, WINDTRE further extended its ultra-broadband FTTH – Fibre To The Home – connectivity services to include 74 other Municipalities, including Florence, Udine, and Rome, for a total of 86. The project is being carried out in partnership with Open Fiber which responsible for providing the fibre optic connections.

*Thanks to a series of agreements that have already been concluded, another 258 municipalities will be reached by 2022, for a total of **271 Italian cities**. This amounts to a total of approximately 10 million homes and businesses that will have access to fibre optic connections at speeds of up to 1 Gigabit per second.*

The Network Functions Virtualisation project

*A challenging project aimed at introducing an NFV (Network Functions Virtualisation) environment to the network infrastructure is currently under way, which will lead to a significant change in the way we implement telecommunication networks, by effectively breaking the hardware and software link present in the traditional equipment. In fact, the landline and mobile network functions will both become software applications, **thus allowing service providers to progressively decrease the development and installation times required for the equipment used to provide services to the end users.***

Thus far the project aimed at moving towards the private cloud NFV environment has allowed all Wind users to be migrated to the new virtualised technology, as well as the gradual migration of data traffic, thereby allowing the activation of new service scenarios, the evolution of the management paradigm, and the consequent increase in network reliability to begin in 2020.

CAPACITY FOR INNOVATION

GRI 103-1, 103-2 e 103-3

5G, Edge Computing, the Internet of Things, Smart Grid, Big Data, Public, Private and Hybrid Clouds, Artificial Intelligence, and Blockchain Technology. In the age of the digital revolution, innovation has become an imperative, and in order to innovate it is becoming increasingly necessary to establish strong relationships with outside partners in order to pursue new and improved solutions. This kind of open innovation is the only way to **promptly respond to the changes taking place and to generate development opportunities for many other business realities throughout the country.**

Thanks to the introduction of Narrow-Band Internet of Things **(NB-IoT)** technology over the 4G network, WINDTRE is able to offer businesses and the public sector access to a series of 5G functions in advance, thereby rendering various services possible, including energy, health, environmental and structural monitoring, while at the same time opening up new opportunities in fields like precision farming, smart cities and smart utilities.

Given the interest in the topics of the Internet of Things, the safe management of collected data, and their transmission to the analysis centres, in 2019 WINDTRE also focused its attention upon the topic of **Blockchain** solutions for various applications.

The new evolving network solutions will also lead to the introduction of application paradigms based on the use of “**edge computing**”, with solutions capable of improving the performance of the computational resources rendered available throughout the territory, especially those that require increasingly reduced latency times, like those in the automotive and energy grid management sectors.

These aspects are complemented by the **Virtualisation of the Core Network**, a technology aimed at ensuring a more flexible use of network resources through “network slicing”, which is based on the sharing of a single physical access and transport infrastructure. This system facilitates the integration of technological and industrial partners for the creation of an ecosystem dedicated to the development of innovative services, which is fundamental for the emergence of new solutions and services to be applied in different vertical sectors, including media, energy, and transport.

The Virtualisation of the Core network allows the infrastructure to scale quickly based on the performance requirements, while at the same time optimising efficiency in terms of electricity consumption.

ROAD TO 5G: A JOURNEY INTO THE FUTURE AND INNOVATION

GRI 203-2 a

In the near future, by implementing a model of sustainable development that offers a high quality of life, we will find ourselves living in smart cities and smart homes. The change will be driven by digital technologies, with the 5G network serving as an enabling factor.

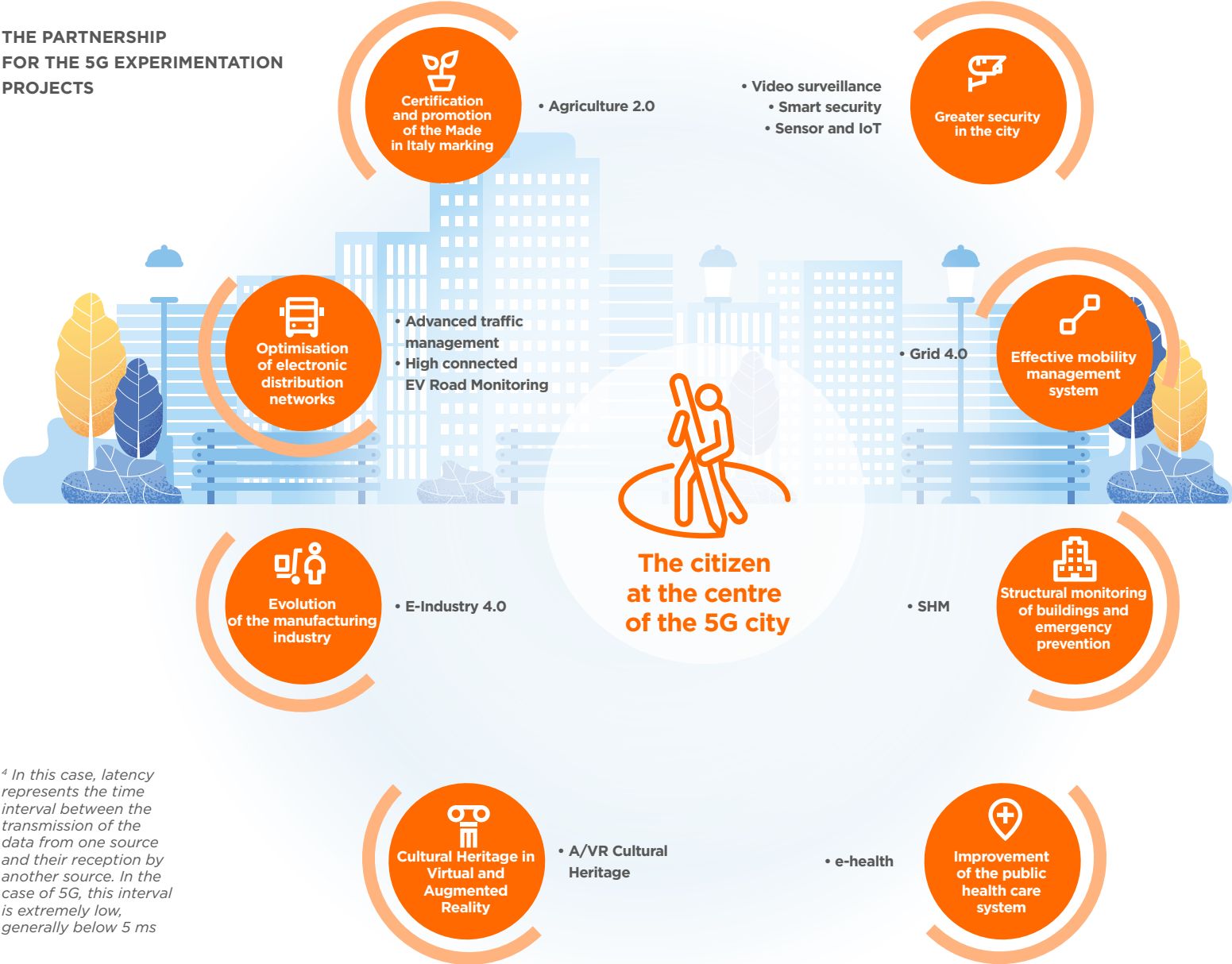
5G technology does not simply represent an evolution of the current broadband networks, but rather **a new technology with enormous potential in terms of both network quality and services**: a revolutionary solution capable of supporting the development of new Smart City applications, such as the IoT for mobility or health care.

Thanks to their high capacity, support for high device density, and low latency⁴, 5G technologies are considered to be essential for allowing connections between objects (Internet of Things), with high levels of reliability and large numbers of connected devices; that's why 5G services can involve multiple application areas.

In Italy, the Ministry of Economic Development initiated a procedure in 2017 for the assignment of projects dedicated to carrying out pre-commercial experiments on the 5G network in 5 Italian cities. And while these experiments were originally scheduled to take place from 2017 to 2021, the deadline was subsequently moved ahead to June of 2020.

ROAD TO 5G

In partnership with Open Fiber, WINDTRE was awarded the tender for the 5G experimentation projects in the cities of L'Aquila and Prato. With the support of various companies, universities and research centres, the goal is to experiment with innovative technological solutions in order to transform L'Aquila and Prato into "5G Cities", this providing social and market opportunities for all the subjects involved in their social and productive fabrics.



The **city of the future** is based on urban planning strategies dedicated to the optimisation and innovation of public services, which bring together the infrastructures of the cities themselves with the human, intellectual and social capital of their inhabitants. These strategies allow for economic activities, environmental resources, mobility, and human relations to be managed in an intelligent manner, in order to **improve the quality of people's lives**, while at the same time meeting the needs of citizens, businesses and institutions.

Within the cities of the future, the new digital technologies will allow for the smarter management of the urban ecosystem, thereby enabling a model of sustainable economic development that offers high quality of life.



L'Aquila

Structural monitoring of buildings and infrastructures A system for detecting and monitoring damage and movements in constructions through a network of drones (e.g. Video Recordings and Video Analytics) and sensors (e.g. accelerometers, inclinometers), which will allow for the real-time monitoring of the 'health status' of the constructions themselves, as well as prompt corrective and preventive interventions, greater safety for citizens, and decreased construction and maintenance costs.

Agriculture 2.0 Innovative solutions in the agri-food sector, such as precision farming and supply chain traceability, thanks to the help of enabling technologies like drones, blockchains, and certification systems. The ultimate goal is to bring greater value to the Made in Italy brand by achieving high standards of quality and authenticity for the products and production processes.

E-health An integrated telemedicine system for distance medical consultations (Smart Glasses), the remote monitoring of vulnerable patients and subjects using technological devices, and the delivery of drugs to patients' homes using drones. This will allow for more prompt and effective interventions, greater satisfaction on the part of patients receiving treatments from home, reduced costs for the healthcare system, and greater accessibility to treatments for citizens.

Smart security Law Enforcement solutions for police and Private Security Agencies involving the use of Smart Glasses provided to agents, and drones equipped with high-resolution cameras for filming from above, with direct connections to the Operations Centre. This will provide for an effective coordinated and collaborative management of the agents activities, preventive and timely management of security services, and greater security for both citizens and agents alike.

Advanced traffic management Advanced traffic management solutions with 5G-connected vehicles capable of interacting with other vehicles and infrastructures, even applied to fleet management (e.g. rescue, emergency, and transport of hazardous substances), both during daily operations and in emergency situations. The advanced traffic management solutions will provide for efficient, effective and safe fleet management services, greater safety for vehicles, drivers and citizens, improved comfort and driving styles, and a significant reduction in road traffic and pollution.

Virtual and augmented reality applied to cultural heritage Solutions aimed at enhancing our cultural heritage with Virtual Reality (VR) technologies for conducting virtual visits of museums and exhibitions in high resolution, and Augmented Reality (AR) for providing users with personalised guided tours, which will provide context information, even using artificial vision techniques.

Prato

Smart Industry (E-Industry 4.0) This instance of use is linked to the digital transformation in the Industry 4.0 sector, thanks to the enabling functions of 5G technologies. The goal will be to demonstrate the advantages offered by 5G for the management and control of distributed energy, energy efficiency, machine diagnostics systems, and staff management, as well as the cybersecurity functions that 5G technology provides for critical applications.

Grid 4.0 The e-distribution company will update one primary substation and no less than 5 sub-substations in the Prato area with advanced remote-control devices based on 5G network technology in order to implement real-time self-healing functionality. The secondary substations will also be equipped with connected sensors in order to detect ambient information (temperature, humidity, etc.) and equipment vibrations in real-time.

Sensors and IoT An IoT/IoE platform enabled by 5G technology for Smart City Management applications, and for monitoring utilities in an intelligent manner, in accordance with the principles of industrial automation.

Public video-surveillance The creation of a public video-surveillance system with advanced automated video stream analysis functions and the use of high-resolution video cameras with 5G connections to the central analysis system for the recognition of people's faces, license plates, and the unauthorised dumping of waste materials.

E-health The use of electronic and communication processes for the national health service in order to plan personalised services capable of guaranteeing ongoing treatments and assistance. The data collected and the possibility of providing ongoing remote support will allow physicians to establish interactive relationships with patients, thus providing them with a personalised treatment approach. The e-health solutions will use 5G technology to ensure high transmission speeds for UHD video streaming, and a reliable, low-latency network for collecting vital parameter data.

High connected EV Road Monitoring The testing of a fleet of electric vehicles and charging stations, with the objective of monitoring the road surface (holes, surface slope, etc.) during normal work activities thanks to the installation of a "black-box" equipped with IoT sensors with a 5G radio transmission module. This module will allow for the real-time transmission of all the low-latency data collected in order to correlate all the IoT sensors installed within the city's perimeter.

Virtual and augmented reality applied to cultural heritage Solutions aimed at enhancing our cultural heritage with Virtual Reality (VR) technologies for conducting virtual visits of museums and exhibitions in high resolution, and Augmented Reality (AR) for providing users with personalised guided tours, which will provide context information, even using artificial vision techniques.

The Horizon 2020 projects for the city of the future

[GRI 203-2 a](#)

- **5G ESSENCE:** this project entails the development of a virtualised "edge cloud" platform, which provides for the possibility of offering extremely low latency solutions that can be applied to various contexts, such as the management of events in crowded places, the monitoring of critical infrastructures, and the use of services on board aircraft. WINDTRE has been helping to define the architecture of the new systems on the 5G network, and has been coordinating the dissemination of the project's results and the creation of the relative business models.
- **NRG-5:** this project aims to foster the development of Smart Grids and the resulting solutions through close collaboration with telecommunications networks for high-impact applications dedicated to the smart management of energy "Demand/Response" processes, such as electric vehicle recharging, infrastructure maintenance, and electrical grid reconfiguration. Furthermore, cooperation between multiple networks, like the energy grid and the telephone network, will allow for predictive analyses to be conducted on the evolution of the infrastructures based on the actual territorial requirements. WINDTRE is responsible for defining the network architecture and, together with its other industrial partners, helps research the potential commercial fallout of the project's results.

- **5G CITY:** this project aims to create an open platform for multiple operators that extends the centralised cloud model to the entire network thanks to the new Neutral Host model, which has been tested in various urban contexts: Barcelona, Bristol and Lucca. In 2019, WINDTRE not only contributed to the consolidation of the experimental aspects in Lucca, but, in particular, helped define new business models enabled by the Neutral Host model within the smart city context.
- **ICT4CART:** this project is dedicated to the development and dissemination of assisted/ autonomous driving and the innovation of road infrastructures for "smart" mobility based on the automation and connection of road transport. Together with its project partners, WINDTRE is involved in researching and preparing the Italian area of the pilot project (the cities of Verona and Trento), where solutions for the advanced management of urban and motorway parking areas, as well as for assisted navigation, with advanced satellite maps that make use of the "European GNSS" - "Galileo" program, will be tested in 2020. In particular, the project allows for the study of new solutions dedicated to the safe management of urban intersections, in order to protect so-called vulnerable road users (VRUs), such as pedestrians and cyclists, as well as merging lanes on motorways, and the cross-border management and interoperability of services throughout Europe.

MUCH CLOSER

GRI 203-1

Up until March 6, 2020 WINDTRE operated on the market with distinctive trademarks, whose different placements and portfolios allowed them to meet the customers’ needs in a targeted manner.

The Private market

The Wind brand considerably strengthened its positioning as a **Family Brand** in 2019 by offering services and solutions designed to meet the needs of all members of the family.

One of the main challenges we’re experiencing with regard to the digital transformation is providing young people with access to the Internet. In fact, the Internet is a daily factor in the lives of children, adolescents and families, and therefore has an enormous impact upon habits and relationships. And while the Internet is a source of opportunity in many respects, it can also simultaneously be a source of many dangers. Aware of the role that it plays in relation to children who are first introduced to the Internet through smartphones, Wind offers **parental control** services with dedicated offerings, and even collaborates with schools and major organisations to educate children on the proper use of digital technologies and Smartphones.

Another important issue is the **digital inclusion** of family members Over 60, who should be given the opportunities and the tools necessary so that they don’t feel excluded by the technological and digital transformations taking place. To facilitate

senior people in their approach to the web, the Wind brand has developed the **All Inclusive Senior** offer, which, in addition to data traffic and unlimited calling time, also includes a smartphone or another easy-to-use phone.

Once again on the subject of closeness to the customer, the company pays special attention to the communities of foreigners residing in Italy. The **Call Your Country** services aim at enabling foreign citizens to keep more easily in touch with their families; in addition to a large amount of data traffic for surfing the internet and unlimited calling throughout Italy, the offer also includes a number of benefits like monthly minutes for international calls, Hot Spot Browsing, Texting, and free online activation.

Finally, in terms of environmental awareness, WINDTRE has partnered with WWF Italia to ensure the protection of the Mediterranean Sea, an invaluable part of our planet’s natural heritage: in fact, by choosing the Wind solidarity option, users can help the WWF by making a small monthly donation, the amount of which is matched by WINDTRE itself.

The 3 brand further developed its portfolio in 2019 by continuing its technological research aimed at implementing an efficient network service capable of connecting the country by breaking down geographical boundaries.

The most important new development introduced by 3 during the course of 2019 was the launch of its **Pay after the summer** service for the first time on the Italian telecommunications

market. Thanks to the company’s partnership with Compass financial group, customers were able to immediately obtain a smartphone of the latest generation with zero money down, and to start paying for it after the summer, in conjunction with the ‘ALL-IN’ and ‘FREE’ Power Summer Edition promotions. A practical and effective solution at an extremely affordable rate.

What’s more, the **ALL-IN** and **FREE** promotions allow customers who can’t do without the latest technologies to even include a next generation smartphone, with zero money down and extremely competitive monthly rates. Customers who are most attentive to the latest technological developments will find that the **FREE** promotion offers customisable options, with the possibility of getting a new smartphone each year with insurance coverage against accidental damage, all at no additional cost.

Thanks to the additional options like the **GIGA BANK** service, which allows customers to accumulate unconsumed data traffic and use it during the following months, the Night FREE service, which provides for internet connectivity from 8 o’clock p.m. until 8 o’clock a.m., and the Grande **Cinema 3** program, the brand has diversified and differentiated its portfolio with respect to the competition, offering customers unique content and excellent value.

In terms of inclusiveness, for people with hearing and vision impairments, the 3 brand has come up with the **ALL-IN 60** deal, which offers unlimited domestic calling, 2,000 text messages, and 60 GB of data traffic for a cost of just € 4.99/month.

The Business market

For **Business clients**, WINDTRE has reinforced its strategic offering with new commercial and technological partnerships aimed at developing solutions driven by the Internet of Things, mainly in the Utilities and Smart Working sectors, once again with the aim of **improving the work quality and lifestyles of its customers**.

With regard to the **Smart Working**, WINDTRE has enriched its portfolio of digital services for VAT holders and Small and Medium-sized Enterprises with smart and innovative solutions designed to assist them with the transformation and digitalisation of their processes, communications and services.

2019 was the year in which WINDTRE BUSINESS launched its new **Office Smart** solution on the market, which provides for integrated fixed and mobile communications, with a high degree of flexibility and ease of use. Office Smart transforms the user’s PC and smartphone into multi-purpose tools capable of receiving direct calls made to their landline number. The increased interest in the use of multi-purpose devices, even under different conditions of connectivity, is driven by the possibility of attending and organising audio/video meetings, even with document sharing. The new desk concept allows for the complete digitisation of corporate communications, with tools like eFax, which offers digital archiving and a constant reduction in the use of paper.

The latest developments in the **Business Digital Solutions** portfolio have been largely dedicated to security and Compliance with the new legal standards, and included the following services:

Secure Web: a Cloud-based service designed to protect network connected devices and personal and business data against the latest generation of cyber attacks. Using the world's most sophisticated technologies, it provides complete protection against Phishing, Malware and Botnet attacks. The company's lines are protected by Cisco's Secure Web solution, which protects the connection against security risks by continuously analysing and updating the possible threats and attempted attacks;

Electronic Billing: in order to manage the company's accounting and store documents in compliance with the latest legal standards, which will enter into force in January of 2019;

MyGDPR: to help customers adapt to the new General Data Protection Regulation, with a comprehensive solution made up of dedicated tools and a specialised support service.

The portfolio of Business Digital Solutions also includes Business Tools like **Pay&Go**, for managing mobile electronic payments, and **Office 365**, in order to ensure the constant availability of cloud-based office and collaboration tools. There are even Digital and Contextual Marketing solutions like **MyWeb**, for creating highly engaging and functional websites, **MyMarketing**, for optimising digital channels with integrated social media campaigns and e-commerce features, and **Hotspot Wi-Fi**, for enriching the clientele's user experience with high quality Wi-Fi connections.

In terms of channels of communication with customers, WINDTRE remains committed to improving, renewing and rendering its digital points of contact efficient, including the Website, the Apps, the new Customers' Area, and the Social Media channels, all of which have been optimised with the latest technologies, complete with features designed to interact with customers in an innovative manner, even using chat bots, which are capable of providing customers with increasingly accurate replies thanks to their fast and comprehensive learning capabilities.

The alliance with Telefonica

*Thanks to the **partnership signed by Hutchison Group with Telefonica**, WINDTRE has enriched its catalogue of solutions for large companies and, above all, has expanded its presence on the international market. Thanks to this alliance, WINDTRE will be capable of meeting the needs of multinational companies with advanced connectivity solutions and integrated digital services that can be adapted to all of their branches, thus ensuring simplified network management through technological upgrading.*

*A new **Multinational Accounts** sales channel, which operates on a global scale, will have access to a rich portfolio complete with Telefonica connectivity services in the countries where it operates, while Telefonica will likewise have access to the Hutchison network's services throughout Europe and Asia. What's more, the alliance can even strengthen the offering of Cloud, Security, IoT and Big Data solutions on an international scale for the sectors in which they will be most beneficial, like the Industrial, Retail, Finance and Tourism sectors.*

*The partnership between two large international telecommunication groups (Hutchison group, present in Italy, Austria, England, Ireland, Sweden, Denmark and Asia, and Telefonica Group, present in Spain, Germany, England, and Central and South America) will enable **operations on three continents while competing on a global scale.***

We like to be clear

[GRI 103-1, 103-2 e 103-3](#)

Through the **Service Charter**, which was adopted in accordance with the provisions of the Italian Communications Authority (AGCOM), WINDTRE informs its customers about their rights and its commitments to quality, including its service activation and fault repair times. The Charter expresses WINDTRE's desire to uphold the values of legality, transparency, objectivity, non-discrimination, the protection of human dignity, minors, public order, and social interests, and the protection of the environment, through its offering of high-quality, efficient, personalised, transparent and innovative services. This document, which can be found on the institutional and brand websites, is updated whenever required due to the marketing of new services or the issuance of special provisions by the Authorities overseeing the market, as well as whenever the targets of the performance indicators change.

In order **to provide its customers with ample opportunities for feedback and verification**, the company offers them a range of tools, such as apps and websites, for monitoring their use of the service, for verifying the correctness of the charges, and for contacting customer service. All information relating to the services provided, charges invoiced, and any complaints submitted are managed via the **Contact Centres**. These centres receive the referral from the customer, check the validity of the complaint, and, if found to be valid, arrange for

the termination of the contract or the reimbursement of the amount due, with the complaint being resolved within the times frame indicated on the **Service Charter**.

Value-added Services (VAS), also known as Premium Services, are added to the basic fixed and mobile telecommunication services, and entail extra charges with respect to the basic services (e.g. digital editions of newspapers and magazines, music, film and TV services, games, horoscopes, ringtones, chats, dating and adult content). The Value-Added Services are provided and promoted by third parties (Content Service Providers), but are billed to the end customer by the telephone service provider, who in turn, based on the contractual arrangements, forward the payment received to the service provider, retaining a share for itself.

WINDTRE combats the unsolicited sale of paid services by using various countermeasures:

1. the adoption of a caring and refund policy in the event that a service is disputed;
2. the adoption of specific guidelines for the purchase of these services, which are more restrictive than the applicable regulations, in order to guarantee an informed purchase;
3. the monitoring of the communication adopted by the distributors of the services, via an outside company, in order to detect any abnormalities and sanction any violations of the rules;
4. possibility of charging the Content Service Providers for the refunds granted to the customers.

Complaints and disputes regarding VAS services are also handled through the Call Centre, which, after receiving a referral, checks the validity of the complaint and, if found to be valid, arranges for the deactivation of the VAS service and the reimbursement of the amount paid.

One major new development in this regard is the technical round table held between the operators and service providers and the Data Protection Authority. The agreements reached, accompanied by a trial period, have resulted in a 4.0 version of the **Premium Service Self-Regulatory Code** (CASP), a series of rules aimed at protecting the consumer and creating a safer and more transparent Customer Experience, which have been agreed upon by the telephone service providers, providers of premium services and consumer associations.

FIND OUT MORE IN THE APPENDIX



Communication channels

[GRI 103-1, 103-2 e 103-3](#)

The quality of a telecommunications service depends upon the company's ability to **communicate with its customers, answering their questions and meeting their expectations throughout every stage of the relationship**: before making a purchase, during the stipulation of the sales agreement, during the course of the supply relationship, whenever any problems are encountered, and whenever the customers' communication habits or

requirements should change, up until the termination of the contractual relationship.

Up until March 6, 2020 WINDTRE managed the websites wind.it, tre.it and windbusiness.it, which described the deals and the ways of activating the various services. These websites also provided access to the **Selfcare Area**, where customers can find useful information, such as their activated rate plans and traffic usage, and can perform configuration activities. Private customers can even obtain support from the **virtual agent** in the Selfcare Area, as well as through the App and the IVR.

Like the Selfcare Areas accessible from the websites, the **MyWind**, **MyTre**, and **WINDTRE BUSINESS** Apps also allow customers to monitor their traffic usage, recharge their accounts, check network coverage, and monitor their active promotions.

FIND OUT MORE IN THE APPENDIX



Customer Care

The quality of the customer care service is essential to the company's marketing and sales strategies: in fact, the proper management of the same allows the company to maintain the loyalty of its customers and the good relations that it has instilled with them, and consequently fosters the company's growth and development.

The Customer Care personnel are involved in e-learning training projects aimed at

improving their skills and professionalism. In particular, in 2019 more than 15,000 hours of training were provided through the now tested E-Learning platforms, which are used in conjunction with traditional classroom training. In 2019 the “trainer empowerment” program was attended by about 50 trainers,

who, in turn, handle the training of all the customer service staff at the company’s and the suppliers’ offices. An Agile methodology campaign, which involved nearly 70 people throughout the various areas of the company’s Commercial Operations, was also added to the training plan in 2019.

The “cross channels” model

For several years, WINDTRE has been implementing the “cross channels” service model on both the consumer and business channels, which allows the Customer Service operator to see all the interactions generated on the various communication channels by the customer. This not only allows for the more effective, transverse, and independent management of the channels through which the customers interact with Customer Service (phone, postal service, email, social networks, apps, etc.), but also allows the service provider to obtain a simple and comprehensive overview of all the interactions generated by the customer using the different channels, even within the context of the same support request. For customers, on the other hand, this allows responses to be obtained more quickly, with no need to repeatedly submit requests through the various contact channels.

Within the context of the modernisation and integration projects, in 2018 the company launched the IP Protocol Contact Center (IPCC), completed in 2019, which involved the integration of all the Contact Centres within a single technological ecosystem, with the introduction of an integrated cross-brand solution for the management of the voice, e-mail, chat, SMS, fax and letter channels.

FIND OUT MORE IN THE APPENDIX



Finally, once again in 2019, the company measured its level of customer satisfaction on a scale from 10 to 100 by having an independent external company conduct quarterly telephone interviews with a representative sample of customers for each market, based on geographical area, type of contract (pre-paid or subscription), nationality, methods of data use, and contract length. The results showed an overall degree of **customer loyalty of 82.4, and an overall satisfaction level of 77.8⁵**.

FIND OUT MORE IN THE APPENDIX



The pursuit of shared solutions

In the event of any disputes, WINDTRE uses two types of mediation tools to minimise the use of the ordinary justice system:

- an **attempt at mediation**, required by the Italian Communications Authority (AGCOM), with the support of a third party (such as the Co.re.coms. - Regional communications committees), in order to reach an amicable solution. In the event of a negative outcome, the user may ask AGCOM and the Co.Re. Coms to settle the dispute, or else may turn to the ordinary law courts;

- the **ADR procedure**, carried out by the consumer associations registered with the National Council of Consumers and Users (CNCU). The mediation is managed online with a dedicated website. The joint mediation process requires a Complaint to be submitted by the customers, even via the Consumer Associations. These complaints are also promptly handled, with a high rate of successful mediation.

In 2018, following also the introduction of the **Conciliaweb** platform (AGCOM 203/18/CONS), the company’s model for managing customer disputes was adapted accordingly. Despite the commitment that the new operating method imposed by AGCOM would require, as of today the outcomes of the mediation proceedings and disputes are generally positive.

FIND OUT MORE IN THE APPENDIX



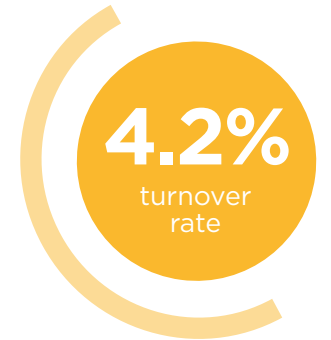
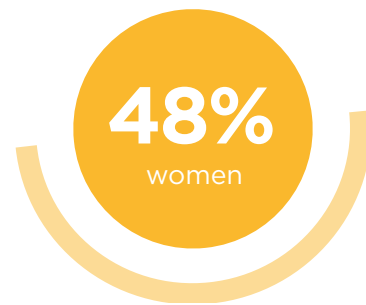
⁵ Weighted average of the findings for the Wind and 3 brands; for detailed results, please refer to the technical Annex.

PEOPLE THE MOST IMPORTANT NETWORK



WINDTRE considers people to be at the centre of its project, and is well aware that the company's success largely depends upon a number of intangible factors and the organisation's ability to respond to the cultural transition taking place with concrete actions. Ongoing skill development, starting with the new digital skills, the pursuit of the best talents, and a focus upon individual well-being both inside and outside the workplace, are all decisive areas of intervention for the sector, in which the company has always continued to invest.

THE WINDTRE PERSONNEL



FIND OUT MORE IN THE APPENDIX

**Top Employer 2019**

in 2019 WINDTRE obtained “Top Employer Italia” certification, which is awarded to the best companies for excellence in the field of Human Resources. The award is bestowed by the Top Employers Institute each year following a thorough screening process, and certifies the implementation of Best Practices focusing on the development and well-being of the company’s personnel.

The following pillars are those that led us to obtain the certification:

LEADERSHIP AND PEOPLE DEVELOPMENT

We invest in Leadership so that it’s widespread and inclusive throughout all levels of the organisation, and we focus on continuous learning, on both a personal and professional level.

WORKLIFE BALANCE-WORKPLACE

The numerous services that we offer bear witness to our commitment and dedication to the well-being of our people, and to ensuring a proper balance between their personal and professional lives. We invest in work environments that are innovative, dynamic and functional, even for occasions of co-working & informal chats.

CULTURE

We believe that a Culture oriented towards inclusiveness and openness lays the groundwork for sustainable results over time. That’s why we believe it’s important to involve our people, with the common goal of making WINDTRE an increasingly better company.

In January 2020, as a confirmation of its commitment to improving people’s lives and work environments, WINDTRE received the Top Employer award for the second consecutive year.

SKILL DEVELOPMENT

GRI 404-2 and 103-1

In order to prepare WINDTRE’s personnel to tackle the scenario of the Company’s transformation, numerous personal development and educational programs were carried out in 2019.

The training activities carried out at WINDTRE are linked to a wide range of topics, and, by way of example, include contents of a technical, regulatory, and linguistic nature, or relating to technological development, soft skills, and specific “job-related” skills.

Training (hours)	2019	2018	2017
Total training	108,435	93,293	61,035
<i>of which health and safety training</i>	<i>26,885</i>	<i>16,109</i>	<i>8,027</i>
Average training per person	15.7	13.4	7.5

WINDTRE’S 2017-2019 TRAINING STATISTICS

The “**Leader as a Coach**” training program, which followed in the wake of WINDTRE’s Leadership dissemination program and saw the involvement of approximately 800 WINDTRE directors, managers and coordinators during several 3-day training workshops on leadership models and skills, and was aimed at developing coaching skills as fundamental levers for the engagement of the company’s entire population, ended in 2019. The program was

primarily aimed at providing all WINDTRE people with greater opportunities to develop their autonomy and potential, thanks to a more advanced management method implemented by their managers. This training program, which followed-up on the other leadership development initiatives that the company has been carrying out since 2017, was fully completed in 2019.

Due to the **technological changes** in progress, the training initiatives were carried out in continuity with the previous years, and were once again focused on the acquisition of the skills necessary for the main transformation programs within the context of the Technology Department, or rather resource, work area, and production cycle optimisation models that simultaneously ensure high quality production and process management. The main topics covered were the following: The move towards 5G technology, Network Function Virtualisation, Six-Sigma, TOGAF, ITIL Foundation, ITACA, and MTNE. These programs, which in 2019 saw the involvement of over 3000 participants from the Technology Department in on-site or e-learning training activities, are part of a multi-year course begun back in 2017.

During the course of 2019, in order to support the development and dissemination of **Agile working** (a program begun in 2017 for several people in the Technology Department), training on the adoption of the Agile methodology was conducted for about 200 individuals, mainly in the Sales Department, and was carried out based on the specific roles that need to be covered, such as Product Owner and Scrum Master, which require specific re-skilling.

With regard to soft skill training, the company launched the **Easy Learning** module on the ConversatiON digital evaluation platform open to all WINDTRE employees, which is dedicated to online *soft skills* training. The training catalogue offered during the initial stage

consisted of **30 courses covering 7 thematic areas**, but will be expanded over time, even as early as 2020. In keeping with the Skills Model introduced by the Company in 2017, the courses can be “assigned” to employees by managers within the context of the Performance Development process, or else can be freely attended by all Company employees without any limitations for individual self-learning purposes. Soft skills are the transversal skills needed to succeed at the workplace, regardless of the role or specific company, and are the basis of a person’s “employability”.

The next great challenge will be the development of the **Digital Mindset** of the company’s employees, with regard to both the more common and transverse skills, as well as the more specific skills relating to specific jobs and the different professional groups to which they belong within the organisation.

FUTURE LEADERS

GRI 103-2

A major investment in personnel development and training, which was begun back in 2017 with a primary focus upon post-merger integration, continued during 2018 and 2019, with a focus on the development of the skills needed within the new business context, including re-skilling and up-skilling, even aimed at the possibility of reusing skills for new activities and upgrading skills with respect to technological changes.

Strengthening skills is crucial for ensuring the company's growth. During the course of 2019, customised multidisciplinary programs, focusing on the development of managerial skills, were carried out for **Future Leaders** at various levels throughout the company (about 120 people). The programs are developed and provided in partnership with major business schools (SDA Bocconi, LUISS), and consist of 5-6 in-person training modules, for a total of 10-13 training days per participant:

- The multidisciplinary **Jump** program arose from the partnership between WINDTRE and the LUISS Business School, and is aimed at developing and enhancing the skills of young talents.

- The **Stretch** managerial development course, the other hand, was designed together with Bocconi in order to help Middle Management figures achieve managerial excellence.

Both programs entail the issuance of certifications from the Business School upon completion.

The **Beyond** Executive Education program was developed in collaboration with People Management Lab in order to guide Senior Leaders on the discovery of some of our society's most complex scenarios of change, with the aim of promoting open and inquisitive leadership with a long-term outlook.

These programs were launched in 2019, and their training segments will be completed in early 2020. The resources involved will take part in additional useful development and growth initiatives in 2020.

PERFORMANCE DEVELOPMENT

GRI 103-3

The **Performance Development** initiative arose with the aim of acknowledging individual value and results, promoting a continuous dialogue between supervisors and employees, and supporting the development of individuals, making use of a 360° feedback approach. In fact, in addition to the manager's top-down evaluation, it also entails:

- **self-assessments** carried out by individuals concerning their own skills, the projects they've carried out, and results they've achieved;
- **Reverse Feedback**, or rather the possibility of providing feedback to direct superiors;
- **Cross Evaluation**, whereby everyone can request an evaluation from other colleagues. For example, a manager can request a cross-evaluation of one of his/her collaborators in

order to obtain a broader overview of his/her personnel.

Through the continuous evaluation of the activities, the digital **ConversatiON** platform helps to improve individual results, promote dialogue, and establish personalised development plans.

With regard to career development, the **ProjectWall**, an initiative that offers all WINDTRE personnel the opportunity to improve their skills and knowledge by participating in cross-cutting projects, was launched in June of 2019. This initiative followed in the footsteps of that launched in 2018, called **CareerWall**, an internal Job posting program that offered all WINDTRE employees the chance to seize upon new opportunities, acquire new skills, and become actively involved in their own professional development.

#diciamolanostra

At WINDTRE, we take the time to listen to people. Ever since 2017, our #diciamolanostra has served as an important way to raise awareness, gather feedback, and share results in the spirit of transparency. A pulse survey involving a representative sample of 2000 employees was launched in July 2019, and, as usual, recorded a high level of participation.

TALENT ACQUISITION

WINDTRE maintains **ongoing partnerships with leading Italian universities**, and participates in student orientation initiatives (academy, career day, company testimonials, etc.). In 2019 we took part in numerous Career Days and Tech Events, introducing ourselves with a new slogan (“Together we make the difference”) and a renewed visual identity, and positioning our desk as a Talent Store. Over the last quarter of 2019, more than 700 CVs and contacts were collected through digital means, with a platform that even allowed us to obtain feedback from participants in real-time. With the aim of building a bridge between the world of academia and the professional sphere, WINDTRE takes in students for curricular and extra-curricular internships.

At WINDTRE, the human resource recruitment process is based on the principles of merit and equal opportunity. The process begins with a request submitted by the department concerned, and continues with the recruitment activities and methodologies deemed most appropriate based on the requested candidate profile (individual interviews, tests, and assessments). In 2019, a total of 120 resources were hired by the company.

During the course of 2019, WINDTRE increasingly aimed to acquire digital professional skills essential for the current and future challenges faced by the company, with a particular focus on skills pertinent to the fields of Big Data & Analytics and IT Development.

OnBoarding is a crucial phase of the talent recruitment process. In addition to bridging the gap between the candidate experience and the employee experience, the **OnBoarding program** also improves employee satisfaction and retention. The company has implemented an OnBoarding Program for new hires, which entails:

- a series of personalised meetings between the new employee and the company's stakeholders in order to expedite the induction process;
- participation in a “shadowing” phase at a WINDTRE store, in order to develop a customer orientation mindset;
- 6 training modules held by our internal Manager Teachers, covering the following topics: Telco Market Scenario & WINDTRE Positioning - WINDTRE Organization in the context of Telco and Digital Transformation - B2B Market & WINDTRE Innovation Projects - Telco & WINDTRE Digital Transformation - WINDTRE Cross-functional Strategic Projects - Big Data & Analytics: a Key Asset in WINDTRE BUSINESS Strategy.”

WORKPLACE

In 2019, WINDTRE once again committed itself to maintaining and updating the numerous welfare programs offered to its employees, always taking their changing needs into account. The company considers individual well-being to be a fundamental aspect, not only in order to gradually improve the level of **personal well-being** within the organisation itself, but also in order constantly improve the **quality of dialogue** with its employees.

Health and safety

[GRI 403-2](#)

The issue of **Workplace Health and Safety** is of the utmost importance for ensuring quality of the life at the workplace, and is overseen internally by a dedicated Management System compliant with of the most widely recognised

international standards.

By establishing improvement goals and virtuous practices that are periodically verified by an accredited external certification body, WINDTRE intends to progressively improve its health and safety record with results that will go well beyond the statutory requirements.

All the elements useful for evaluating the company's results in the field of Workplace Health and Safety, such as the outcomes of the audits, any anomalies encountered, the training initiatives, the objectives, and the available resources, are re-examined by the Top Management on an annual basis. Based on the evidence that emerges from this analysis process, WINDTRE is able to determine any changes that need to be made to the relative internal Management System, once again with the aim of ensuring continuous improvement.

Injury rate per million hours worked (no.)	2019	2018	2017
Employees (during work)	2.7	1.5	2.7
Suppliers (during work)	0.7	0.5	0.5
Employees (during travel)	4.7	3.7	5.6
Total	8.2	5.7	8.8

WINDTRE's 2019 HEALTH AND SAFETY FIGURES

Benefits

The main **benefits** offered to all the company's staff, regardless of their level or contract type, include the following:

- The **WINDTRE Solidarity fund**, which provides all the employees with universal healthcare coverage, including dependants, common-law spouses, and domestic partners;
- **100% supplementary remuneration for mothers during the period of optional maternity leave;**
- insurance policy covering life and permanent disability due to disease;
- injury policy;
- supplementary pension fund;
- various contractual benefits (e.g. paid time for medical visits and nursery school integration time).

A smart and digital workplace

Among the welfare initiatives promoted in recent years, those which WINDTRE believes to be particularly important consist of innovative tools aimed at improving the work-life balance of its employees. In addition to the teleworking and **Smart Working** initiatives launched in previous years, which at year end involved approximately 3,800 people, or 54% of the company's population, in 2019 the **#time4me** initiative was also launched, which offers various work schedule flexibility solutions: the "*Part Time*" option, with reduced daily hours for those who need to dedicate a few fixed hours of their days to family/personal commitments, the "*Seasonal Off Period*"

option, which is particularly suitable for those who need to dedicate themselves to family/personal projects for a short period of time, and the "*Short Week*" option, which offers the possibility of having time off work for half a day, a full day, or two full days a week.

WINDTRE has been investing in the **Digital Workplace** since 2018, with a series of initiatives designed to facilitate the digital transformation of the work environment and its use. The most important initiatives included the modernisation of the computer fleet, the provision of headsets equipped with microphones to the employees, and the introduction of video-conferencing tools and collaboration software, like Skype for business and MS Teams. In addition to significantly reducing the total number of journeys made by WINDTRE personnel, these tools have also shown that they improve interaction and collaboration among individuals. This reduction has also had a positive impact on the environment; in fact, our estimates show that, on their own, the smart working methods implemented as of 2019 have already led to a reduction in commute-related CO₂ emissions equal to over **850 tonnes of CO₂** per year.

The activities that the company has carried out since 2018 have also allowed it to rapidly and effectively implement the additional smart working methods rendered necessary by the health emergency that hit Italy in early 2020.

WINDTRE for the children

Among the welfare programs, the initiatives intended for the employees and, in particular, the employees' children, hold a prominent position. These projects have the important goal of offering WINDTRE's personnel opportunities to facilitate the management of their children, often even giving them the chance to have some fun. For example, from 1 September through 31 July, the Rome, Pozzuoli and Palermo locations operate **company daycare centres** capable of accommodating up to 90 children, which offer flexible services in relation to the business hours, in order to meet all the children's needs.

WINDTRE also offers **summer camps** for the children of employees at its Milan, Rome, Ivrea, Pozzuoli, and Palermo locations ranging from 6 to 13 years of age. This program provides significant help during the summertime, when schools are closed. With the support of dedicated and qualified staff, the camps offer areas for conducting educational, sports, leisure, and recreational activities. The company makes a contribution to the participation fee, for a maximum of two weeks. In 2019, a total of 407 children participated, for a total of 618 weeks purchased, and 75% of the applications submitted were accepted, based on the order in which they were received.

The company helps its employees afford the cost of schoolbooks with **School Vouchers**, which can be paid back in instalments deducted from the employees' pay cheques: in 2019 this service was utilised by 176 employees.

Finally, the initiatives dedicated to the employees' children also include the **#schoolreward**, a monthly award for children who have achieved excellent results in middle school and high school during the course of the year. In 2019, the award was received by 45 middle school students and 17 high school students.

Elder Care

The **Elder Care** service is designed for those who are facing difficult situations in assisting elderly or disabled relatives. The service provides help with locating and booking home care solutions or accommodations at healthcare facilities, and even provides information on bureaucratic procedures, such as applications for attendance allowance, invalidity, and national health service accreditation. In this manner, the service allows for immediate support to be provided for any requirements or emergencies linked with the care and/or assistance of elderly or disabled family members. A total of 98 WINDTRE workers took advantage of this service in 2019.

WINDTRE per Noi

Through the **WINDTRE per Noi** platform, the company offers its employees a series of popular services, such as family assistance, healthcare assistance, and ways to save time and money, thanks to a range of corporate agreements and discounts. The platform

contains a series of services designed to simplify people's daily lives and relieve employees of various burdens, such as:

- **Concierge service:** laundry, shoe repair and minor clothes repairs, with collection and pick-up on the company premises free of charge, purchase of over-the-counter medicines.
- **Administrative procedures:** the execution of administrative procedures free of charge by a staff member who collects all requests in the company, carries out the activities required, and returns the related documentation to the company (Post Office, Government Offices, Universities, etc.).
- **On-line consulting service:** free news and detailed information relating to the fields of medicine, paediatrics, psychology, law, and taxation, with the possibility of requesting the assistance of certified professionals for personalised consultancy for an agreed fee.
- **On-line Temporary Shop:** allows products to be purchased at discounted prices for a limited period of time.
- **Concessions:** operating nationwide in Italy, with discounts available from a large number of retailers and service providers in the immediate vicinity of the workplace.

The following services aimed at ensuring a proper balance between work and family life are also available to the head office employees:

- **changing rooms** and **showers** at the Rome and Milan locations, in order to encourage physical activity during the hour-long break;

- **Amazon Lockers** at the Milan, Rome and Pozzuoli locations, in order to allow employees to receive their purchases at the office, without interrupting their work activities;
- a **physiotherapist, osteopath** and **nutritionist** at the Milan and Rome locations, who can provide expert advice on health and lifestyle issues during lunch breaks;
- the **Company Library:** an in-house "book crossing" that employees can use to donate and borrow books recommended by their co-workers.


In 2019 all the services provided by WINDTRE Per Noi were appreciated considerably, with a total usage percentage of 75% among the employees.

Finally, it should be noted that, during the course of the year, the following services were added to those already available:

- the opening of **3 bar areas** at the Milan, Rome and Ivrea locations;
- the expansion of the range of welfare services with the creation of an on-line and on-site pension information desk service, called **#Thinkofthefuture**, where employees can obtain advice from a pension and social security expert.
- the establishment of an agreement with **GYMPASS**, which offers all WINDTRE personnel the possibility of engaging in physical activity at more affordable prices.



THE FUTURE RE THAT AWAITS US



THE DAWN OF A NEW PARADIGM IN THE TELCO SECTOR

GRI 102-6, GRI 102-15

The telecommunications industry's global landscape is changing faster than ever, and the industry finds itself facing the emergence of a **new paradigm**. Due to a constantly changing technological scenario and an extremely competitive market, Telco operators are seeking out new ideas and solutions to diversify their business models.

Around the world

The global telecommunications market reached a value of almost **2.7 trillion** in 2018, with an annual growth rate (CAGR) of 4.4% since 2014, and will reach 3.5 trillion in 2022⁶.

The mobile segment provides for the greatest share of turnover worldwide, thus attesting to the declining trend in landlines and the increasing role played by mobile telephony, especially in the **data** segment.

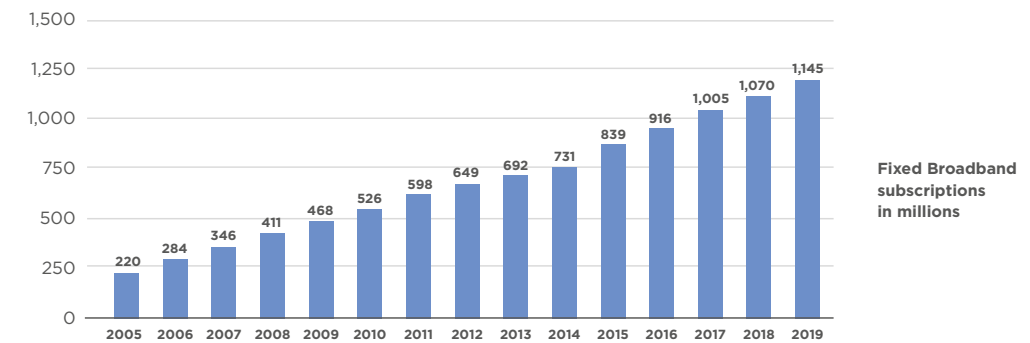
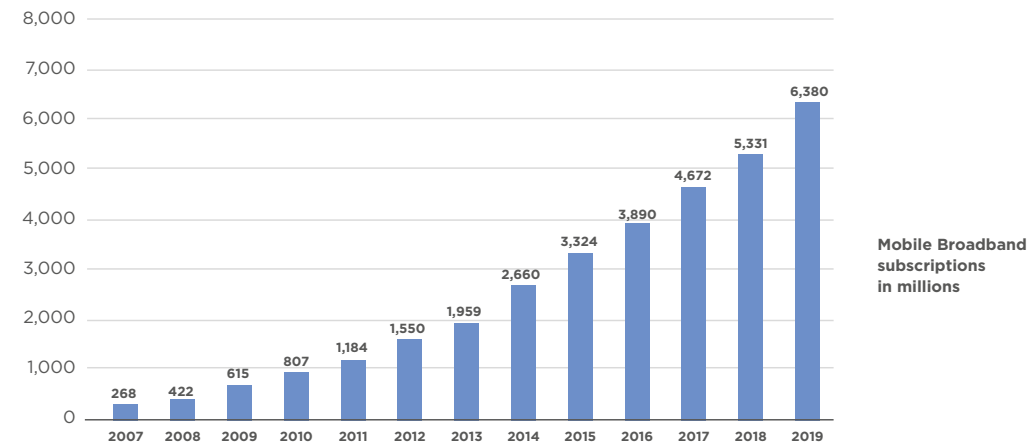
⁶ *Wise Guy Reports (2019) - Telecoms Global Market Opportunities and Strategies to 2022.*

EDUCATION
LIFE
RESPONSIBILITY
INCLUSION

The work areas defined with our stakeholders for contributing to the SDGs in the framework of the digital revolution

TREND IN THE WORLD OF USERS OF MOBILE AND LANDLINE NETWORK BROADBAND SERVICES UP UNTIL 2019

(Source: ITU, 2019)



Thanks to intense market competition, consumers are now able to switch service providers more easily. In Europe and North America this has led to a 15% increase in the average **abandonment rate**, and a corresponding decrease in the average revenue per user⁷.

In this context, the **challenges for growth** lie in the fewer resources available, due to the drop in earnings, and the need for investments over the short to medium term. In fact, the development of ultra-broadband services is directly linked to **investments in network infrastructures**, which are the necessary condition for the provision of these services.

According to industry analysts⁸, ultra-broadband will be the fundamental enabler of the “*digital transformation*”, in which the added value for providers will be the **ability** to support a large number of connections and data traffic, rather than coverage and connection speeds, and the **technological mix** offered with the ultra-broadband landline

network services and the 5G mobile network services will be what makes the real difference.

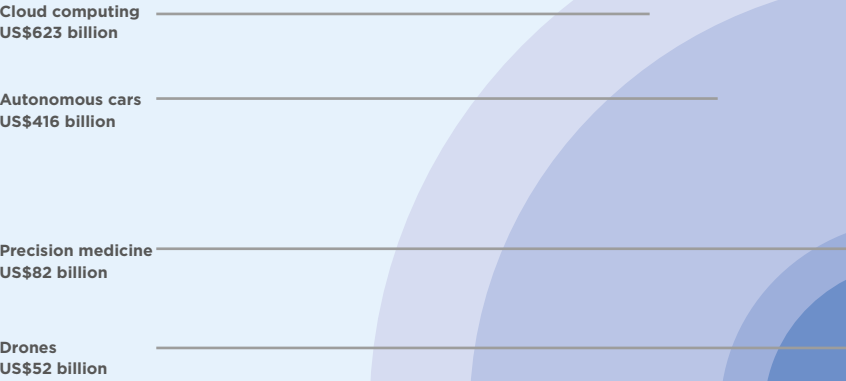
5G, for example, is a platform that enables various technological applications, and will lead market players to **diversify** their business solutions in order to seek out new pathways for growth.

The innovativeness of the offering will therefore have to be in line with the availability of **Industry 4.0** technologies, the so-called *4IR Technologies*, such as Artificial Intelligence (AI), Internet of Things (IoT), Big Data Analytics, Blockchain and Cloud technologies. According to the World Economic Forum, these technologies will significantly reshape the global economy, opening up new markets like precision medicine, autonomous vehicles, 4.0 drone logistics, and many more. In order to give us an idea of the potential offered by these opportunities, it is estimated that 14% of the global economy’s growth from today through 2030 will depend on the application of Artificial Intelligence alone⁹.

⁷ MCKINSEY (2019) - Telecom operators: Surviving and thriving through the next downturn.
⁸ CORCOM (2019) - Ultra-broadband for business, the challenge faced by TELCO companies.
⁹ World Economic Forum (2020) - The Global Risk Report 2020.

FORECASTS FOR SEVERAL 4IR MARKETS AS OF 2025.

(Source: World Economic Forum)



In Italy

After the United Kingdom, Germany and France, **Italy** ranks in fourth in Europe in terms of turnover for both mobile and landline telecommunications services.

Over the past 10 years, the Italian Telco sector’s turnover has declined by almost 30%¹⁰. There have been two main reasons for this loss: the reduction in prices, which has been particularly evident in Italy, where, according to the latest AGCOM Observatory landline broadband services and mobile services have respectively

suffered an annual decline of -15.8% and -9.5% since 2015¹¹, and competition from the so-called Over-the-Top¹² players, who have succeeded in quickly taking over large shares of the new digital markets enabled by the networks.

The decrease in service activations on the **landline market** has now become constant. In 2019, however, there was a significant change in the technologies used to provide the service. In fact, while 90% of landline network accesses were made over copper wire in 2015, today these are fewer than half thanks to the rise of technologies like fibre optics (FTTC and FTTH),

¹⁰CORCOM (2018), *Telco for Italy, Report 2018*.
¹¹AGCOM (2019) – *Observatory on Communications – Fourth quarter 2019*.
¹²AGCOM defines Over-The-Top (OTT) operators as companies that use the Internet to supply services, contents and rich-media type applications (e.g. advertising banners that appear at the top of a web page during a visit). These companies mainly make a profit from the sale of contents and services to end users through dealers (such as in the case of Apple and iTunes) or through the sale of advertising space, as in the case of Google and Facebook. OTTs are companies without their own infrastructure, that operate above the networks, hence the term over-the-top.
¹³AGCOM (2020) – *Observatory on communications, fourth quarter 2019*.
¹⁴AGCOM (2019) – *Annual report to Parliament*.
¹⁵ISTAT (2019), *2019 Report Statistics, Businesses and ICT*.
¹⁶ISTAT (2020) – *Permanent business census: initial results*.
¹⁷ISTAT (2020) – *Permanent business census: initial results*.

FWA (Fixed Wireless Access), and xDSL (Digital Subscriber Line) solutions¹³.

The **mobile** segment, on the other hand, recorded an overall annual increase in users, due in large part to the rapid growth of *Machine to Machine* SIM cards (+3.3 million units). This term, often abbreviated as **M2M**, is used to indicate a new ecosystem of solutions that allows for the automatic exchange and real-time analysis of data between connected devices (either wireless or wired), thus enabling the so-called “Internet of Things.”

In 2019 alone, due to the insertion of ultra-broadband services within the landline network infrastructure, and the initial implementation of the 5G mobile network, **investments in network infrastructures** on the Italian market increased by 17%, for a value of € 8.4 billion¹⁴. This infrastructural development is essential for recouping Italy’s gap in the use of ICT by both families and businesses.

As of 2019, 74.7% of **Italian households** accessed the Internet from home with a broadband connection, and four out of ten **businesses** utilised a fast or ultra-high speed landline connection¹⁵.

According to the latest Istat statistics, from 2016 to 2018 over 77.5% of Italian companies with at least 10 employees, and 97.1% of those with more than 500 employees, invested in at least one of the **technologies considered to be a key digitisation factor**, including Cloud, IoT, Print 3D, Fibre Optics, Big Data, 4 and 5G, and

augmented and virtual reality.

From 2019 to 2021 there are further increases in so-called structural investments (such as cloud solutions, fibre optic or mobility connectivity, and management software), primarily in the fields of **security** (+33.5% in terms of number of companies) and web **connectivity** (+13.1%)¹⁶.

The digital transformation under way requires both organisations and the people involved in them to get back into the game.

In order to do this, companies must take action on two distinct levels. The first consists of **seeking out resources with excellent digital skills**. While such profiles do not necessarily have to be sought outside the company, in order to make this determination one must have an excellent knowledge of the in-house skills present, so that a professional transformation and *reskilling* process can be initiated. Over the past three years, the level of ICT skills adopted by Italian companies has remained more or less stable, and ICT experts are only employed by about 16% of companies with at least 10 employees¹⁷.

The second, on the other hand, involves the **development of Digital Soft Skills**, or rather the skill set that has emerged in the light of the digital transition under way: relational and behavioural soft skills that allow people to effectively use the new digital tools in order to increase the productivity and quality of the work activities.

OUR CONTRIBUTION
TO THE 2030 AGENDA

The in-house development of digital skills and a culture suitable for the transition under way has now become one of the most difficult challenges faced by **human resources**, but is also a major opportunity for the organisation itself. In fact, according to the latest Istat statistics, there is a strong positive correlation between the adoption of technologies and work productivity in terms of added value per employee.

[GRI 203-1](#), [GRI 103-1](#), [GRI 103-2](#), [GRI 103-3](#)

During the last years WINDTRE has conducted an in-depth review of how digital technologies can contribute to the achievement of the goals outlined by the 2030 Agenda for Sustainable Development: the **Sustainable Development Goals** (SDGs). These goals encapsulate a strong demand, expressed by civil society as a whole, for the creation of a global sustainable future, which is still widely disregarded.

In this context, WINDTRE is strongly convinced that it can play a key role in helping the younger generations and their families make the transition towards a digital and interconnected society. This is the only way to **foster the development of new generations capable of enjoying the advantages that the technological transition offers, while at the same time protecting themselves against the many risks that it poses.**

In addition to being a business opportunity for companies, ICT is also an excellent driver for achieving the United Nations' Sustainable Development Goals, as it has a direct and indirect impact on almost all the major issues for which the goals have been developed.

ICT solutions can significantly accelerate social, cultural, environmental and economic changes, and can therefore be an excellent enabler for achieving the SDGs.

In September of 2015, the United Nations General Assembly adopted the 17 Sustainable Development Goals (SDGs) with the resolution titled “Transforming our World: the 2030 Agenda for sustainable development”, and made an important promise: not to leave anyone behind.



While ICT is not the solution in and of itself, with commitment and specific investments its proper use can have a targeted impact upon the individual problems highlighted by the goals.

Digital innovation for the SDGs

[GRI 203-2a](#)

Digital innovation for the SDGs is the program sponsored by WINDTRE dedicated to the preparation, together with our stakeholders, of the current and future reference scenarios for the joint planning of initiatives in support of the Global Agenda. With the research report published in May of 2018, **WINDTRE outlined the scenario for the 4 areas in which the Telco sector's contributions can have the greatest effect: education, social inclusion, digital responsibility, and quality of life and environment.**

DOWNLOAD THE REPORT "DIGITAL INNOVATION FOR THE SDGS" 

In 2019 the project focused on the future of our cities, with the aim of reflecting on how a smart transition would affect their sustainability, competitiveness, and quality of life. In the light

of the central role that 5G technology will play in the success of smart cities, WINDTRE especially wanted to investigate how its role in this technology's implementation could best be combined with the promotion of the Sustainable Development Goals.

Goal 11, Sustainable Cities and Communities, **"Make cities and human settlements inclusive, safe, resilient and sustainable"**, encompasses all the environmental and social challenges to which cities can offer effective responses. It is therefore an ideal container for many of the 2030 Agenda's other goals, such as the fight against poverty, the protection of the environment and water resources, the promotion of equality, and the support for quality health care and education for all.

5G cities, sustainable cities is the document that tells the story of WINDTRE's journey into the future of cities, and symbolically encapsulates the challenges and opportunities of this century, the potential and limits of the smart transition, and the implications associated with the various dimensions of sustainability.

DOWNLOAD THE REPORT "5G CITIES, SUSTAINABLE CITIES" 

The Milan Smart City Conference

In 2019 WINDTRE was a partner of the first edition of a major international conference dedicated to the future of smart cities, the 'Milan Smart City Conference', which was held at the "Fiera Milano" exhibition centre from 13 to 15 November. Industry experts, managers and representatives of the institutions discussed the key issues of smart cities, and the new technologies and innovative services that will be present in the cities of the future thanks to the development of 5G and ultra-broadband.

WINDTRE attended the 'Milan Smart City Conference' with a dedicated stand, where, thanks to the use of "Gear VR 3D" viewers, visitors had the opportunity to watch a 'Virtual Reality' video on the integration of Wind and Tre networks, and on the development of the new 5G services. WINDTRE even hosted various technological partners with whom it collaborates on the testing of 5G services.

MILAN SMART CITY



SMART



SMART



EDUCATION ON



THE NEW
GENERATIONS
AND THE
DIGITAL WORLD

GRI 203-1



ONLINE AND OFFLINE, WITHOUT BORDERS

GRI 203-2a, GRI 103-1, GRI 103-2, GRI 103-3

The digital transformation will have made radical changes to the world in which we live in just a few years' time.

At the **workplace**, machines will perform almost all of the executive tasks currently entrusted to human beings, and people need to possess new skills. While the **essential skills** will consist of leadership skills, critical thinking and creativity, people will nevertheless have to **adapt** to a world in which digital technologies are present in every field, regardless of their specific job. In fact, this is an issue that will affect the **whole society**, because people will also need these same skills in their personal lives as **citizens and consumers**.

YOUNG PEOPLE
AND THE DIGITAL
REVOLUTION

Education as the key
tool to deal better with
a world that
the digital revolution
is transforming

There’s no doubt that the digital revolution will have major consequences for people and society as a whole in terms of greater possibilities and speeds of connection with other individuals, increased freedom of expression, and access to and sharing of knowledge.

However, in an increasingly connected world, in which **the boundaries between the physical and digital dimensions are becoming**

increasing blurred, the management of one’s own identity becomes a fundamental issue. **Starting with the first times that we access the Internet.**

The Internet and social media are now an integral part of young people’s daily lives, offering countless resources for learning, participation and creativity. But they also pose new challenges for parents and teachers, as well as for the children themselves.

Positive factors	Negative factors
+ Transparency	+ Privacy hazards
+ Interpersonal connections	+ Risks of “hyperconnection” and “nomophobia”
+ Sharing information	+ Online bullying
+ Freedom of expression	+ Identity theft
+ Efficient use of machinery and devices, including public ones	+ Risks of lack of transparency in data processing

WINDTRE for Internet safety

WINDTRE sits on the Advisory Board of the “**Connected Generations**” project, a program through which the European Commission promotes strategies aimed at making the Internet a safer place for young people by promoting its positive and conscientious use. The project is coordinated by the Ministry of Education, Universities and Research (MIUR), in partnership with the Postal and Communications Police, the Child Protection Authority, Save the Children Italia, and Telefono Azzurro. The program entails a series of initiatives, including a wide-ranging communication and outreach campaign, training activities for school communities (teachers, children, teens, parents, educators), and the improvement of specific help-lines managed by Telefono Azzurro and Save the Children.

Once again in 2019 the company took part in **Safer Internet Day**, which has been established and promoted by the European Union in order to raise awareness among young people of the responsible use of the web and new technologies. With its participation in the event, WINDTRE once again confirmed its attention and commitment to the issues associated with the protection of minors and the proper use of all the tools of the digital world. In keeping with the recommendations of the Digital Agenda for Europe and the goals of the European Commission’s “Europe 2020” strategy, the theme chosen for this edition was

“Together for a better Internet”, an invitation to reflect on how much the Internet is present today in the lives, relationships, and everyday habits of young people and their families.

On the occasion of the Safer Internet Day 2019, WINDTRE launched the “**NeoConnessi**” project, the digital and media education initiative by the Wind brand that’s intended to raise children’s awareness of the proper and responsible use of the Internet, which is described in greater detail in the dedicated section.

WINDTRE is also an official partner of the “**Una vita da social**” campaign promoted by the Postal Police, in collaboration with the Ministry of Education, Universities, and Research (MIUR), which falls within the scope of the various initiatives aimed at raising awareness and preventing the risks and dangers of the Internet for minors. The campaign will make numerous stops all over the country, and will discuss the topics of social networks, cyberbullying, online solicitation, and the importance of security and privacy.

The 6th edition of the initiative began in Matera in January 2019, and made stops in all major Italian cities, ending in Rome. Throughout the various editions, the postal police specialists have met with a total of over 1.7 million students, 180,000 parents and 100,000 teachers, covering a large part of Italy.

THE NEOCONNESSI PROJECT

The NeoConnessi educational project stems from the desire to assist families and teachers with the delicate task of introducing children to the Internet. The project targets fifth grade Italian primary school children, and is aimed at raising their awareness of the proper and responsible use of the Internet.

The goal is to help parents and teachers tackle this change in an educational, empathetic and practical manner, with the aim of analysing the various implications, but without scaremongering. The course aims to teach how to balance trust and control, understanding and awareness, openness and watchfulness, and is centred around a “training contract”, which is shared and signed by all three “parties”: the children, the parents and the teachers.

In 2019 the project engaged **3,750 classes throughout Italy**, which were provided with the teachers’ guide and the “magazine” for parents, containing useful tips and information. These included all of the 41 schools proposed by the WINDTRE employees.

At the end of the training course, the classes were invited to participate in the contest titled “**A Three-Way Pact**”, in which the teachers, parents and children were required draw up an Internet user’s manual. Out of over 1,000 entries received, the best three were selected, and the schools from which they were received were awarded computer equipment as a prize.

In May of 2019, the NeoConnessi project even brought experts to meet with parents and teachers at schools in four major Italian cities in Italy: Rome, Milan, Bari, and Bologna. The meetings, which were conducted by journalist Federico Taddia, together with teacher/pedagogue Rosy Nardone, and psychiatrist/psychologist Gianna Autullo, played out as a dialogue with the public, who confronted the experts with their doubts and questions about the handling of connected devices by children, the safe use of the Internet, and the extraordinary opportunities offered by the Web, as well as the potential risks.

NeoConnessi it’s also a website (www.neoconnessi.it), an online magazine featuring weekly releases based on the project’s 4 main areas of focus (technology, pedagogy, psychology and education), complete with insights and advice from experts, games for children, tests, and much more.

In 2019 WINDTRE also launched the “Family Protect” app, for families with children under 14, which is designed to satisfy young people’s desire to remain constantly connected to the Internet, while at the same time meeting their parents’ need to protect them.

SKILLS FOR THE WORKPLACE

The WINDTRE Academy: Touch 5G Experience

In order to offer engineering graduates the opportunity to gain the managerial and professional skills they’ll need within the context of new the scenarios that will be arising with 5G technology, WINDTRE has created an orientation course on the professions of the future in collaboration with the Polytechnic University of Milan’s Career Service.

6 Masterclasses led by an Internal Faculty of WINDTRE Managers and Ambassadors. An **engaging and interactive 5G Journey** lasting 3 months, which tackles the latest innovative and technological issues:

- Strategic evolutions of TELCO industry
- Strategic changes in the Telco industry
- Upcoming innovative services & solutions
- The key role of data - data governance & data driven strategy

- Technology strategy to support new business opportunities - 5G spectrum & evolving architecture in core network & transmission
- Network as a key business enabler - focus on access network
- Operations of the future - the transformation journey – intelligent Operations

The Academy course ended with a day of celebration at the WINDTRE headquarters, complete with the awarding of the course completion certificates. It’s an important orientation program during which our managers recount their experiences, respond to the students’ questions, and illustrate the opportunities for growth and development in various roles of potential interest for future engineers.

The second edition of the Academy will be launched in 2020, and will be open to 30 of the most brilliant engineering undergrads from the Polytechnic University of Milan.

The intergeneration Lab

The Intergeneration Lab is a multi-company initiative (held in collaboration with Terna, Acea and SAS) promoted by the ELIS Consortium, and is based on the involvement of people over 40 years of age in innovation projects together with high school students. The projects are based on the “hackathon” model, deal with cutting edge topics, like Blockchain Technology and the Internet of Things, and are aimed at developing innovation skills in more mature individuals, using an “oxygenation” and “contamination” methodology. A total of nearly 50 WINDTRE staff members from all the company’s departments were involved in these initiatives, taking part in 3 days of in-person activities.

OnStage

The WINDTRE internship program, OnStage, is a structured training program for both undergraduate and graduate students. In 2019, 45 undergraduates and recent graduates participated in the program’s 4th edition, 13 of whom were hired by WINDTRE at the end of their internships. The 5th edition will be launched in September of 2020.

The underlying concept of the WINDTRE Internship Program is to make the Interns themselves the protagonists of the training process. This concept gave rise to name OnStage. It’s a play on words in different languages: while in English a stage is structure upon which a speaker or actor becomes a protagonist, in French the word stage means internship. Hence the name OnStage! The project is made up of numerous stimuli, which are designed to make the young Interns continuously put themselves to the test. The interns start their adventures together, sharing and taking part in experiences, networking, and becoming an integral part of a community, even at the company level.

The stages of the journey

WELCOME DAY

A day dedicated to welcoming the interns and introducing them to the company. Since first impressions are extremely important, WINDTRE introduces itself over a cup of coffee, alternating video presentations with participant introductions. It’s also an opportunity to break the ice and to create an initial bond with their mentors and other fellow interns.

PERSONAL BRANDING DAY

On this day a professional Coach holds an in-depth lesson on Personal Branding, both online and offline, with a particular focus on LinkedIn, and on effective communication and elevator pitch techniques.

INNOVATION & TEAM BUILDING DAY

On this day the Community comes together for the first time to spend a day in a start-up accelerator. It’s an emotionally stimulating experience that’s aimed at creating a team-building and networking dynamic among the interns. The chance to meet with and learn from successful start-uppers is an opportunity to broaden their horizons by exploring a reality other than that of the company, all in the name of innovation and in pursuit of professional opportunities linked to the digital world.

CHARITY DAY

An experience of high emotional value. By spending this intense day with one of our social partners, the group’s ties are strengthened and the collaboration between the interns themselves becomes more fluid and spontaneous. In working together with guests and operators from therapeutic communities and social cooperatives, one is naturally inclined to collaborate, adapting to the surrounding environment, although it may be an unfamiliar one that’s far removed from our everyday patterns.

GRADUATION DAY

A day dedicated to receiving feedback and final thoughts on the training experience.

LUISS EnLabs: the start-up factory

GRI 203-2a

With approximately 5000 m² of office space at the Termini railway station building in Rome, LUISS EnLabs has become one of the largest business accelerators in Europe. A veritable “start-up factory”, recognised as a benchmark both nationally and internationally, that hosts approximately 400 young people offering courses, services, and contacts with potential investors. WINDTRE and the LUISS University have been part of the project since it was set up in 2012. Seven years after its launch, **LUISS EnLabs now has a portfolio of 65 start-ups, which have collectively raised over € 60 million in funds.** 80% of the start-ups that emerge from the five-month acceleration program succeed in raising money from third party investors, a percentage

that’s unrivalled throughout Europe.

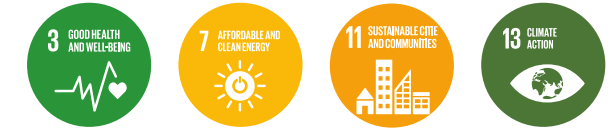
The goal is to **provide students and aspiring entrepreneurs with an important opportunity on the job market**, transforming the best business ideas into successful economic initiatives. These partnerships have led to collaborations with successful digital start-ups who have gone on to become part of WINDTRE’s range of services. By way of example, these include the Wind Gamepix products, dedicated to gaming lovers and developed in collaboration with the start-up Gamepix, and WindLex, the legal assistance platform for small and medium-sized enterprises developed in collaboration with the start-up NetLex. Their successful experience in Rome led the same LUISS EnLabs partners to launch a similar project in Milan by opening the **Milano LUISS Hub**, which was inaugurated in early 2018.

WINDTRE presents the Road to 5G

On March 15, in collaboration with Open Fiber and ZTE, WINDTRE presented the Road to 5G at the LUISS Hub for Makers and Students in Milan, an event dedicated to the topics of innovation and the digital transformation. Industry experts, students, journalists, young people, start-uppers and visitors were given the opportunity to discuss how digital technologies and innovation are radically changing our daily lives. The fifth-generation technologies have also been prominent among the ‘use cases’: the security, agriculture, e-health, and Smart Home sectors are just some of the areas that visitors can explore, with specific demos showing the potential and concrete applications of 5G technology. The Road to 5G day is part of the second edition of Milan Digital Week. The event, held from March 13 to 17, features meetings, seminars, exhibitions, performances and workshops created by citizens, communities, businesses and institutions, and by leading players in the digital transformation.



PROTECTING THE ENVIRONMENT AND HEALTH



ENERGY CONSUMPTION

[GRI 103-1, 103-2 e 103-3](#)

WINDTRE's main environmental impact is linked to **energy consumption**. In fact, a telecommunications service provider's activities are based on the use of network infrastructures and plants, such as antennas and data centres, which require a continuous power supply, as well as air conditioning to keep the machinery within a constant temperature range.

The **network infrastructure** is responsible for 94% of the Company's energy consumption. As for the remainder, 5% is attributable to the **offices, call centres** and proprietary **shops**, and just 1% is attributable to the consumption of fuel for the **corporate vehicles**.

CONNECTION
BETWEEN
ENVIRONMENT,
HEALTH AND
QUALITY
OF LIFE

Reducing
environmental impacts
and adopting smart
solutions for cities
and people's health

Energy consumption management for the reduction of carbon dioxide (CO₂) and other greenhouse gas emissions into the atmosphere is currently considered to be one of the main challenges of combating climate change.

Emissions caused by human activity have increased considerably over the past century and a half, generating a layer of substances around the earth that which retain heat and consequently cause global warming. The current production models are still heavily dependent upon the use of fossil fuels for meeting their energy consumption needs, and are therefore a major cause of this global phenomenon.

In recent years, the rise in the average global temperatures, the gradual melting of the ice caps, and the increase in the frequency of extreme atmospheric phenomena have prompted the mobilisation of the international community, which has identified the **fight against climate change** as a priority, and has demanded that all countries take concrete actions.

Since the 1990s, the European Union (the world's largest energy importer) has played a global leadership role in combating climate change by adopting policies for reducing greenhouse gas emissions and for increasing the efficiency of its industries and consumption systems.

On March 4, 2020, the European Commission published its proposal for the “European Climate Law”, which will make the goals set in the European Green Deal binding, with the aim of ensuring a climate-neutral European

economy and society by the year 2050. This means that, in taking all the necessary measures to reach the target, the European Institutions and Member States will be bound – and monitored – in an egalitarian, collaborative and unified manner.

In Italy, the National Energy Strategy, as laid out in the National Energy Plan, defines the steps to be taken in order to achieve the European Union's ambitious goals, from the improvement of energy efficiency, to the complete decarbonisation of the energy system.

Despite the need to maintain high levels of infrastructure technical performance to meet its Customers' expectations, **WINDTRE has been committed to significantly reducing its energy consumption for years**, in an effort to make a concrete contribution to the fight against climate change. To this end, the company constantly monitors its energy consumption, and actively pursues technical and behavioural solutions that can be used to reduce its environmental impact¹⁸.

The network infrastructure's extensive presence throughout the country requires it to be primarily powered by the national electricity grid, with only a small percentage being powered by proprietary photovoltaic systems and diesel generators. The same applies to the company's structures (offices, call centres and shops), almost all of which use electricity purchased from the domestic grid, and, to a much lesser extent, diesel and natural gas to power their generators and boilers, which provide heat or electricity.

¹⁸ Since Wind Tre is not subject to any legal constraints concerning the reduction of CO₂ emissions, it should be noted that all the initiatives taken in this regard are purely voluntary [GRI 305-MA 1.2](#).

Total energy consumption (Gj)	2019	2018	2017
Total energy consumed	2,959,620	2,989,650	3,171,361
<i>of which direct consumption (scope 1)</i>	<i>31,738</i>	<i>34,526</i>	<i>34,682</i>
<i>of which indirect consumption (scope 2)</i>	<i>2,927,882</i>	<i>2,955,123</i>	<i>3,136,679</i>

WINDTRE also produces energy from renewable sources thanks to its 13 proprietary photovoltaic systems connected to the domestic grid. In 2019, these systems allowed the company to generate 1,300 GJ of electricity on its own.

FIND OUT MORE IN THE APPENDIX 

Energy efficiency projects

Following the merger of Wind and H3G, WINDTRE began **modernising its entire national network in order to guarantee that it would be capable of supporting services of the latest generation, while at the same time ensuring high energy efficiency standards**. The main activities that will help the company achieve this goal are the following:

- the modernisation of the **mobile network equipment** (replacement of the equipment with the latest generation energy efficient equipment);

- activation of the energy saving functions on the equipment with variable operating loads;
- the modernisation of the **infrastructures** housing the equipment (migration toward outdoor configurations with lower requirements in terms of cooling energy);
- the **synergistic consolidation of the Wind and Tre networks' technological sites** (the centralisation of the equipment reduces direct and induced consumption and optimises the energy streamlining initiatives).

Base Transceiver Stations (BTS) are units equipped with antennas that receive and transmit radio signals for mobile phones within specific geographical areas, known as radio cells, and constitute the basic mobile telephony infrastructure.

Thanks to the modernisation of its equipment, in recent years the company has reduced the energy required for its activities, while at the same time preparing itself to handle the

continuously increasing traffic volumes. The energy saved by the BTS is mainly electricity from the domestic grid [GRI 302-4b](#).

Within the context of this modernisation process, one of the most significant initiatives has been the introduction of **Free Cooling** technology on the BTS and the large power stations. This cooling system is based on the use of external air to cool the equipment, and reduces the energy consumption of the air

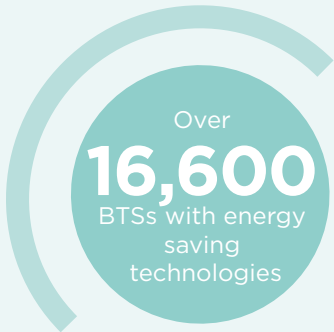
conditioning units by conveying the warm air outwards.

The introduction of Free Cooling technology not only provides for a reduction in energy consumption, but also extends the service life of the air conditioning units themselves, drastically reduces the needs for maintenance interventions, and provides for considerable financial savings.

FIND OUT MORE IN THE APPENDIX



IMPROVEMENT OF ENERGY EFFICIENCY:
NO. OF BTS WITH ENERGY SAVING TECHNOLOGIES



TOGETHER FOR THE ENVIRONMENT

In partnership with the WWF to reduce atmospheric emissions

WINDTRE has been collaborating with WWF Italia for years on the issue of climate change. In fact, starting with the joint analysis of the greenhouse gas emissions released into the atmosphere as a result of the company's activities, expressed in tons of CO₂ equivalent, this partnership has resulted in WINDTRE's commitment to reducing its atmospheric emissions of climate-altering gases over the years.

Over 90% of WINDTRE's emissions are caused by the telecommunications network's energy consumption. Despite the considerable increase in traffic volumes generated by customers, which have a major impact on the telecommunications network's indirect consumption of electricity purchased from third parties, from 2017 to 2018 the total emissions generated by WINDTRE's activities decreased by 14% (from more than 278,000 to approximately 241,000 tonnes of CO₂ equivalent).

Thanks to the energy efficiency measures implemented since 2011, the company is estimated to have avoided in these years over 190 thousand tons of CO₂ emissions. This calculation was carried out based on the energy efficiency certificates obtained as a result of the process of modernising the company's equipment, begun in 2011 [GRI 302-4 c](#) [GRI 305-5 c](#).

The company also decreased its emissions per traffic unit by more than half from 2017 and 2019.

New reduction targets within the framework of the partnership with the WWF will be set during 2020; the new targets will have to be aligned with those of the Paris climate agreement (the so-called *Science Based Targets*), and will have to be capable of keeping the emissions under control in the face of expected increases in mobile data traffic.

FIND OUT MORE IN THE APPENDIX



Greenhouse gas emissions (tonnes of CO ₂ eq.)	2019	2018	2017
Total emission	241,037	262,919	278,229
<i>of which indirect</i>	<i>231,628</i>	<i>252,909</i>	<i>268,447</i>

Generazione Mare

In addition to addressing the topics of climate change and energy consumption, the partnership with WWF Italia also entails **joint activities aimed at raising the employees’ and the customers’ awareness** of environmental issues and supporting the WWF’s environmental protection programs. Within the context of this partnership, **WINDTRE has committed itself to protecting the Mediterranean Sea** (not only for the sake of Italy’s natural heritage, but that of the entire planet as well) by supporting the WWF’s **#GenerAzioneMare** (GenerAction Sea) campaign, which is dedicated to protecting the landscapes of the Mediterranean region and its indigenous animal species often threatened by human activities and pollution.

By signing up for the “**WINDTRE and the WWF for the Mediterranean**” option, customers can choose to donate 50 cents each month in support of the #GenerAzioneMare campaign. In turn, WINDTRE doubles the amounts donated, and transfers all the revenues to the campaign in order to help protect the species at greatest risk, like the Loggerhead Sea Turtle.

As part of its partnership with WWF Italia, each year during the month of March WINDTRE participates in **Earth Hour**, the largest global mobilisation organised by the WWF to combat climate change and to promote sustainable lifestyles, which involves over 2 billion people worldwide. WINDTRE promotes this initiative to its customers and employees via dedicated web and social media campaigns.

Awareness begins at the office

WINDTRE has committed itself to reducing its environmental impact through a series of initiatives promoted at its offices. The program is aimed at improving the sustainability of the work environment and reducing waste, even by performing simple daily tasks.

- *the installation of automatic systems at the Network stations for turning the lights in the technical rooms on and off;*
- *the replacement of neon lights with LED bulbs at all the company’s locations;*
- *the installation of curtains on the windows at all the company’s locations to filter out sunlight, thereby rendering the use of the air conditioning units more efficient.*
- *the installation of Ecobox units at all the company’s locations, and the ecological rating of the Rome location by the AMA*
- *the use of recycled paper and recyclable toner cartridges in the office printers.*

*In order to facilitate sustainable mobility, the company has equipped itself with 109 **pooled cars**, which are available to all the employees through a corporate car sharing app; these include **6 full-electric models and 11 hybrids**.*

*At the end of 2019, the company also launched a **LESS PLASTIC COMPANY campaign** to reduce the amount of unnecessary plastic in its offices.*

*The campaign entailed the donation of new **WINDTRE water bottles** to all the employees, and the **elimination of plastic bottles and cups** from the offices. With this initiative, the company expects to **reduce its yearly waste by an amount equal to over 520 thousand bottles and almost one million disposable plastic cups**.*

Solutions for our customers

WINDTRE actively **supports its customers with products and initiatives aimed at monitoring and reducing energy consumption**, thereby generating awareness, efficiency and a positive environmental impact along its value chain.

The company offers energy management devices on the market that can be classified as *smart technologies*, or rather highly advanced machines that are capable of “making decisions” based on certain context variables. WINDTRE also offers its customers and businesses numerous services to help them take advantage of the opportunities offered by the digital transformation to reduce their energy consumption.

For example, **the new virtual switchboard** developed by WINDTRE is a smart solution aimed at helping companies reduce their numbers of devices and the need to travel, thus resulting in

benefits not only for the environment, but also in terms their employees’ work-life balance.

Moreover, WINDTRE also promotes the development of cloud solutions that improve computational capacity, application performance and data security, thereby reducing overall energy consumption. It also favours the use of highly efficient and environmentally friendly data centres. One example is the agreement with **Supernap Italy** which reduces the company’s environmental impact through co-location and the use of technologies designed to optimise the efficiency of all operations, thus allowing it to achieve an extremely low PUE (Power Usage Effectiveness) factor. Supernap uses **100% energy generated from renewable sources**, and this is one of the reasons why Supernap data centres have been ranked first by Greenpeace in its Clicking Clean Report.

MONITORING
OF ELECTROMAGNETIC
EMISSIONS

The regulatory limit values in Italy for electromagnetic fields are governed by Italian Law no. 36 or February 22, 2001 and DPCM July 8, 2003, and establish much more conservative values in all residential areas exceeding four daily hours (6 V/m as a daily average value).

This limit is much lower than the limits recommended by the Council of the European Union (1999/519/EC), which are based on the guidelines issued by the ICNIRP (**International Commission on Non-Ionizing Radiation Protection**), an international body accredited for evaluating the effects of electromagnetic fields on human health.

In fact, the ICNIRP guidelines indicate a power density limit value equal to 10 W/m² which, in terms of electric field (e.g. for frequencies of around 2 GHz), corresponds to a limit value of 61 V/m.

The regulatory limits in Italy for electromagnetic fields are therefore much more conservative. But while the limit value in terms of electric field is just one tenth of that proposed by the ICNIRP, that for the evaluation of the relative effects in terms of power density (which is measured in watts per square metre, and not in volts per metre) is 100 times lower.

When compared with the average of the other European countries, for a number of frequency bands the differences in the maximum emission values permitted are up to 15 times lower, thus confirming an extremely cautious approach in Italy for all the radio technologies (400 - 900 - 1800 MHz and over 2 GHz).

WINDTRE constantly and carefully monitors its compliance with the limits imposed by the law, and all the analyses carried out on its installations have always shown electromagnetic emission values lower than those established by the Italian legislation.

For new installations and expansions of existing installations, WINDTRE performs preventive electromagnetic emissions monitoring in order to ensure that the level of overall emissions within the target area remains within the levels required by law, even downstream of the intervention point. Once the authorisations have been obtained from the competent authorities (Regional Environmental Protection Agencies, Municipalities, Superintendents), the company constantly monitor the meters in order to ensure that the equipment does not exceed the power and emission levels established for the area in question.

Furthermore, as of 2015, the monitoring data for the plants covered by the regulations of 12/12/2014,¹⁹ which require the average daily power to be verified, have been rendered available on the regional ARPA websites.

WINDTRE is aware that the electromagnetism generated by its network infrastructure raises concern among the general public, despite the extremely precautionary approach adopted by the Italian legislature. For this reason, in addition to constantly monitoring its own emissions, the company is also committed to furthering the scientific research in this field thanks also to the support of the trade association ASSTEL.

SMART CITY, SMART LIFE

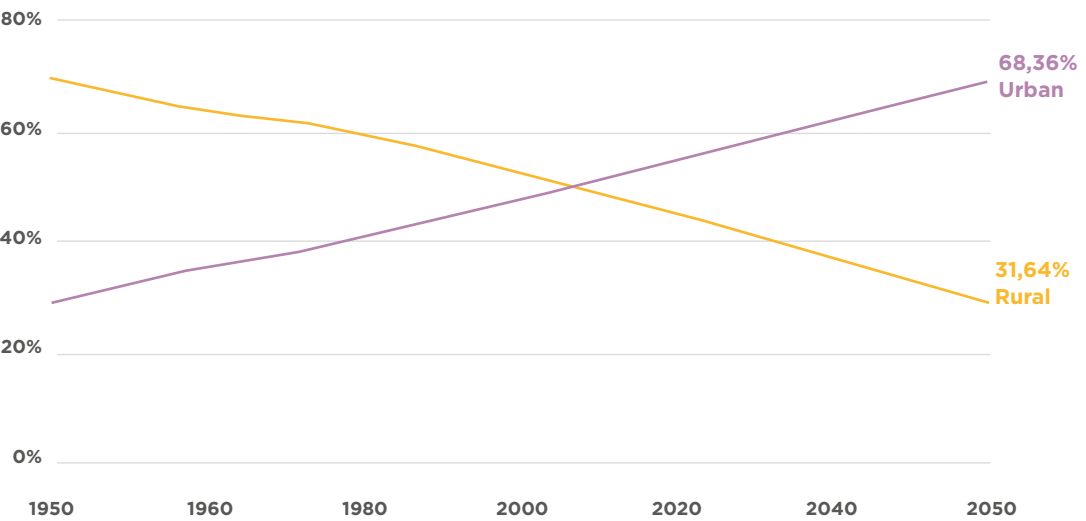
People have been increasingly deciding to move to the cities for over a century, whether by choice or for work purposes. It's a trend that took off during the last century, and has been fuelled by population growth, showing no signs of slowing down.

By the year 2050, **68%** of the Earth's

population will live in cities, most likely “**smart cities**” where digital technologies will render the services more efficient, the economic activities more sustainable, and the quality of life much better, thanks to the enormous amounts of data that the networks will transmit in order to manage the flows of energy, goods, and traffic in real time.

¹⁹ Italian Ministerial Decree of 02/12/2014, “Guidelines concerning the definition of the ways in which the service providers provide the ISPRA and the ARPAs/ APPAs the plant power data and the definition of the power reduction factors to be applied to the forecast estimates in order to take into account the temporal variability of the plants’ emissions over the span of 24 hours” (OJ no. 296 of 22/12/2014).

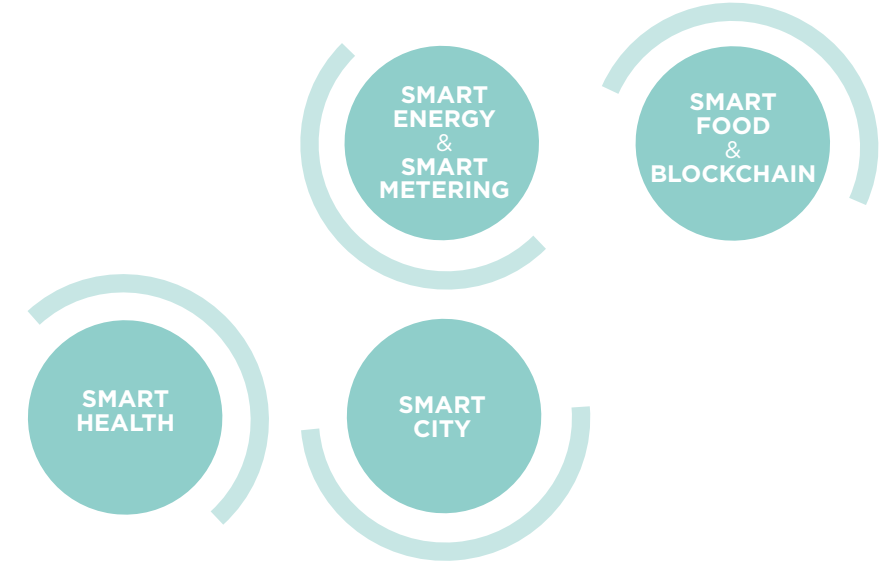
Variazione della popolazione in aree rurali e urbane a livello globale tra il 1950 e il 2050 (previsione).



Fonte: Elaborazione di Our World in Data sulla base dei dati UN World Urbanization Prospects (2018).

WINDTRE is establishing commercial and technological partnerships in the various sectors of industry, energy production and distribution, transport, agriculture, and public administration, in order to develop **IOT solutions** designed to help Companies and end users.

These technologies are aimed at improving their quality of work and lifestyles: to conserve and use the energy resources available in a conscientious manner (**smart energy, smart metering**), to obtain details regarding food production/distribution cycles (**smart food and blockchain**), to correlate environmental data in order to prevent certain forms of illnesses (**smart health**), and to perform monitoring activities in order to render certain areas of our cities more secure (**smart city**).



The 5G City

A revolution is coming that will change our cities, transforming them into digital places for digital citizens.

To discover our contribution to the cities of the future, please see also the first chapter.

Advanced traffic management

Advanced traffic management solutions with 5G-connected vehicles capable of interacting with other vehicles and infrastructures, even applied to fleet management (e.g. rescue, emergency, and transport of hazardous substances), both during daily operations and in emergency situations.

Virtual and augmented reality applied to cultural heritage

Solutions aimed at enhancing our cultural heritage with Virtual Reality (VR) technologies for conducting virtual visits of museums and exhibitions in high resolution, and Augmented Reality (AR) for providing users with personalised guided tours, which will provide context information, even using artificial vision techniques.

E-health

An integrated telemedicine system for distance medical consultations (Smart Glasses), the remote monitoring of vulnerable patients and subjects using technological devices, and the delivery of drugs to patients' homes using drones. This will allow for more prompt and effective interventions, greater satisfaction on the part of patients receiving treatments from home, reduced costs for the healthcare system, and greater accessibility to treatments for citizens.

Grid 4.0

The distribution grid will be equipped with connected sensors in order to detect ambient information (temperature, humidity, etc.) and equipment vibrations in real-time.

Agriculture 2.0

Innovative solutions in the agri-food sector, such as precision farming and supply chain traceability, thanks to the help of enabling technologies like drones, blockchains, and certification systems. The ultimate goal is to bring greater value to the Made in Italy brand by achieving high standards of quality and authenticity for the products and production processes.

Smart security

Law Enforcement solutions for Police and Private Security Agencies involving the use of Smart Glasses provided to agents, and drones equipped with high-resolution cameras for filming from above, with direct connections to the Operations Centre. This will provide for an effective coordinated and collaborative management of the agents activities, preventive and timely management of security services, and greater security for both citizens and agents alike.

Sensors and IoT

An IoT/loE platform enabled by 5G technology for Smart City Management applications, and for monitoring utilities in an intelligent manner, in accordance with the principles of industrial automation.



An example of E-Health: the Activage project

Created at the end of 2016, the **Activage** e-health project funded by the European Union will continue until 2020. The goal is to create the first European ecosystem in seven countries, through open and proprietary IoT platforms, in order to disseminate solutions for monitoring people's health in their everyday environments, especially the elderly. In this project, WINDTRE plays the role of a technological partner, by participating in the design of the service, and helps to identify and develop the best methods for analysing the data collected. The remote monitoring of physiological and environmental parameters collected by sensors (IoT), and the analysis of the relative data using Artificial Intelligence solutions, are providing a new approach for better decisions to be made regarding the health of individuals and entire categories of patients. **The remote monitoring using the IoT provides for a reduction in unplanned emergency hospitalisation and specialist visits, with consequent benefits for patients and family members, as well as the health system as a whole.**

At the end of 2019, WINDTRE introduced its new BRAINE project proposal in order to optimise its network slices with Big Data analysis and artificial intelligence tools: the project will start in mid 2020.

ExpoMove, the mobility of the future

In 2019, WINDTRE sponsored ExpoMove, the first major event dedicated to electric and sustainable mobility, which was held at the Fortezza da Basso in Florence from April 9 to 12. The topics discussed at the event included smart cities, new mobility services, the development of the green economy, and the experiences of several Italian Municipalities in each of these areas. At the WINDTRE stand visitors had the opportunity to watch a 'Virtual Reality' video on the integration of Wind and Tre networks, and on the development of the new 5G services, thanks to the use of "Gear VR 3D" viewers.

*WINDTRE even hosted two start-ups linked to the world of electric mobility within a dedicated area. **Smart Mobility**, which was part of the Luiss EnLabs program, a business accelerator with which WINDTRE collaborates, illustrated the multi-vehicle as a shared mobility service. In particular, the stand offered visitors the opportunity to preview an electric bike with a portable battery.*

***Scuter**, on the other hand, a start-up company partly owned by LVenture Group, exhibited a shared mobility service based on an innovative three-wheeled vehicle designed exclusively for sharing. The smart scooter can be ridden without a helmet, is controlled from a smartphone, and is regulated by blockchain technology. A pedal assisted 'fat bike', produced by Italmoto, was also exhibited, and could even be tried out by visitors.*



RESPONSIBILITY

WORKING
WITH INTEGRITY,
GUARANTEEING SAFETY

[GRI 102-12](#)



CORPORATE GOVERNANCE

Although not listed on the stock exchange, WINDTRE has adopted an extensive series of rules and organisational structures aimed at **ensuring a fair and efficient system of corporate governance** designed to protect the rights and interests of the investors and all the other stakeholders. In fact, the company has chosen to go well beyond compliance with the current laws and regulations, and has adopted an approach inspired by the international best practices [GRI 102-16](#).

INTEGRATED
APPROACH TO
FAIRNESS AND
TRANSPARENCY

Guaranteeing the
control of
corporate
processes
for the sake of
all stakeholders

WINDTRE is dedicated to ensuring that its business activities are carried out with integrity, and in a fair and professional manner, while at the same time maintaining high ethical standards and respecting the local and international regulations. The **Code of Conduct** (<https://www.windtregroup.it/IT/governance/Codice-Condotta-mo.aspx>) provides **behavioural guidelines** for the company's personnel while performing their day to day duties, thus strengthening the company's credibility and reputation within its operating context.

For each of the companies belonging to the Group, WINDTRE has adopted an **Organisation and Management Model pursuant to Italian Legislative Decree no. 231/01**, which identifies the rules and principles of control for preventing crimes, and is periodically updated in order to effectively meet the legal requirements and adapt to any organisational changes. WINDTRE has also appointed a collegiate **Supervisory Body**, consisting of two external professionals and two internal managers, which is responsible for monitoring the Model's adequacy and effectiveness.

The fight against corruption
[GRI 205-2](#)

Drawing inspiration from a series of domestic and international anti-corruption regulations, WINDTRE has adopted an **Anti-Corruption Policy** that defines the ethical principles and standards to be observed during the

management of the company's activities, in order to mitigate the risk of corruption and ensure compliance with the applicable standards and regulations.

WINDTRE has implemented a Due Diligence Procedure in relation to its Business Partners, which, based on the risk level, requires appropriate preventive checks to be carried out upon the Business Partners themselves. The procedure requires a verification and assessment of the relative reputational risk to be carried out prior to initiating a commercial relationship with a Business Partner.

This verification is based on the collection and verification of information about the partner, such as its qualifications and skills, its reputation, and any ties/interactions it may have with Public Officials or other politically exposed individuals. At the same time, in order to determine the overall risk, the purpose of the contract, the nature of the activity, and the type of compensation are also analysed.



In order to highlight and strengthen its commitment to fighting corruption, **in 2019 WINDTRE also joined Transparency International Italia**, the Italian chapter of the largest global organisation dedicated to preventing and fighting corruption.

Conflicts of interest

In 2017, WINDTRE adopted a **Conflicts of Interest Policy** in order to provide guidelines for identifying any actual, potential, or perceived conflicts of interest, and to define the relative communication and management process. In order to implement the principles of the Policy, the company asked all the managers to sign a relative declaration, with all of the declarations received being filed in a special register.

In order to render the procedure itself more effective, a dedicated **digital platform** for the collection and monitoring of all the declarations was also implemented on the company's intranet in 2018.

Management of Reporting - Whistleblowing

[GRI 102-17](#)

In compliance with the Italian legislation on **whistleblowing**, the **Whistleblowing Procedure** defines the process of receiving and managing any reports of behaviour and/or conduct that may constitute a potential violation of the Code of Conduct, the Organisation and

Management Model pursuant to Italian Legislative Decree no. 231/01, the company's procedures and regulations, as well as the current laws and regulations.

The procedure defines the responsibilities and operating methods relating to the storage of the information provided, the verifications to be carried out, and the confidentiality of the whistleblower's identity. There are **various channels of communication** (telephone, dedicated website, e-mail) that any employee and/or third-party can access in good faith, even anonymously, without fear of retaliation, in order to **report any potentially illegal conduct**. These channels are managed by an external and independent company that's able to guarantee the confidentiality of the whistleblower's identity (as required by art. 2 paragraph 3 of Italian Law no. 197/2017) using computerised methods.

The Auditing, 231 Compliance & Risk Management Manager oversees and coordinates the reporting management process, involving all the necessary business functions, and evaluating any verification and/or investigative activities based on the severity of the violation itself.

Transparency in institutional relations

WINDTRE has long-standing collaborative relationships with local, national and European institutions for promoting Italy's technological and economic development, in keeping with its own corporate values.

The relationships between WINDTRE and the institutions are aimed at addressing the main issues on the target market and highlighting the implications that a given provision might have on WINDTRE and the entire telecommunications sector.

In this regard, the constant regulatory monitoring carried out by the company is aimed at rapidly analysing opportunities and possible critical impacts on the telecommunications market. Downstream of this, WINDTRE asserts its own position and submits any proposed changes to the measures being analysed with the competent institutional offices.

It should also be noted that **WINDTRE does not provide any form of funding to politicians or their political parties**, abstains from exerting any form of undue pressure on political figures, and does not sponsor events aimed at providing political propaganda.

WINDTRE also dedicates maximum attention to its relations with **Consumer and user associations**, represented nationally by the CNCU, with which it has engaged in a virtuous dialogue for several years in order to ensure the protection of consumer interests, with a spirit of loyal and transparent collaboration and information sharing. WINDTRE's institutional relations and ongoing dialogues with the associations' representatives are stimulated by the desire to better understand the needs of consumers, and have led the company to promote greater knowledge and awareness of the services that it offers to its customers.

Risk Management

WINDTRE has appointed an organizational structure responsible for the **Enterprise Risk Management** process, operating in coherence with the CKHH Group policies and with the international best practices.

Twice a year, the company carries out a "Risk and Internal Control Self Assessment" activity with the purpose of:

- identify the risks that can potentially have an impact on business processes and in general on the business and evaluate them in terms of impact and probability;
- identify and evaluate any mitigative measures in place or planned by the management in response to the identified risks, and subsequently found through audit verifications;
- update and maintain the corporate risk register ("risk universe");
- send to the CKHH Group half-yearly reports (so-called Risk Management and Internal Control Assessment and Declaration).

The activity, coordinated by the Audit, Compliance 231 & Risk Management Department, involves all the management in order to identify and assess the risks and the effectiveness of internal controls both at "Entity level" (risks strictly connected to the strategic objectives of the Company) and at the "Process level" (risks and controls of the main business processes).

TOTAL QUALITY MANAGEMENT

WINDTRE's Integrated Management System, which was adopted by Wind in 2005, was extended to cover the entire organisation (locations, personnel, processes, and functions) in 2017.

The system engages all the company's functions in guaranteeing and documenting the quality and the correctness of the processes, with the aim of guiding and monitoring the performance levels, while at the same time applying the principle of continuous improvement typical of "Total Quality Management."

WINDTRE's integrated system consists of five certifications:

- Quality | ISO 9001:2015
- Environment | ISO 14001: 2015
- Occupational health and safety | OHSAS 18001:2007
- Corporate social responsibility | SA8000:2014
- Information security | ISO 27001:2013

During the first half of 2019, WINDTRE obtained the three-year renewal of its SA 8000 certification, which required employee interviews and department and site audits to be conducted at locations all over the country.

With the participation of all the Company's management bodies, over the course of the year the maintenance and improvement activities required by the standards were carried out for all the other certification schemes

In 2020 the company will also be working towards compliance with the new ISO 45001 international standard required by OHSAS 18001 (Worker Health and Safety), the three-year renewal of the relative certificates, ISO 27001 certification (Cloud services, Housing and physical security of the supporting Data Centres), and the annual renewal of the remaining certifications comprising the Integrated Management System.

The supply chain

[GRI 102-9, 102-10 e 102-11](#)

The main players in the supply chain often consist of large international providers of physical infrastructures, equipment, network services, and software. WINDTRE had 736 qualified suppliers in 2019.

At the time of their selection and qualification, throughout the course of the relative management period, WINDTRE requires its suppliers to meet specific criteria in terms of **quality, environmental performance, health and safety**, and **ethics**, in compliance with the provisions of the company's integrated management system, and with a particular focus on suppliers whose activities could potentially have a major environmental impact.



Within the scope of its **SA8000** Management System, WINDTRE carried out checks upon a sample of suppliers by administering a specific questionnaire on the following issues:

- **corporate social responsibility**, SA8000, size, distribution in terms of gender and level, contractual level, number of hours worked, management of overtime and benefits;
- **environmental policies**, ISO 14001, certifications held, qualification procedures;
- **workplace health and safety**, ISO 45001, analysis of stress levels and internal micro-climate;
- **quality**, ISO 9001;
- **information security**, ISO 27001.

The checks did not reveal any significant inconsistencies with the SA 8000 Standard. The checks served also as an opportunity to raise awareness about requirements for compliance with the standard (Disciplinary Code disclosure and Code of Ethics adoption).

FIND OUT MORE IN THE APPENDIX 

DATA PROTECTION

For the telecommunications industry, the main challenge in the field of **data protection** (both personal and otherwise) is to combine the complexity of ensuring rigorous respect for the regulatory obligations, with the simplicity desired by the customer in using the services, all within an extremely dynamic environment in which the business and the relative technologies are constantly changing.

[GRI 103-1, 103-2 e 103-3](#)

The issue of **privacy and data security** is important to WINDTRE, as the company's systems contain an enormous amount of information regarding its customers and their habits and preferences. Furthermore, if requested, certain data must be rendered available to the judicial authorities for the purposes of investigating and punishing crimes.

While the impacts associated with the management of the customers' personal and non-personal data are the direct responsibility of WINDTRE with regard to the data stored, they may also be derived from the business relationships that the company entertains with third parties who handle parts of the sales and support processes, and who consequently have an entirely legitimate need to access the customers' data.

Any significant loss of data would entail considerable risks for the company in terms of its reputational, economic, and operational profile. In view of these risks, the company has taken all the measures necessary to ensure

maximum data and information security, as well as compliance with the latest privacy and cybersecurity legislation, in the interests of both the company itself and its customers.

The company's policy on privacy and data security is primarily aimed at ensuring regulatory compliance on both a domestic and European level, even taking into account the introduction of the new General Data Protection Regulation (GDPR) approved in 2016, which became effective on 25 May 2018, and the introduction of the new cybersecurity legislation. WINDTRE also aims to prevent any loss or damage of the data managed by the same, and to limit the damage and restore normal business operations as quickly as possible in the event that any incidents should occur.

Thanks also to the harmonisation processes that have taken place over the past two years, the company has now adopted a Governance, Risk Management and Compliance system (eGRC) that allows it to monitor the entire data processing chain, as well as to analytically assess the level of compliance of each system involved. Furthermore, the company periodically conducts risk assessments in relation to its data processing activities, and, in the case of new services, carries out preventive analyses in order to ascertain the legality of the data processing methods envisaged. In consideration of the provisions of the GDPR, new analysis and verification processes were developed (e.g. Privacy by Design and by Default) during the course of the year, which

have been implemented on a company-wide scale. In particular, the company's intranet contains all the procedures for which the Regulatory Affairs Department is responsible, which have been implemented in compliance with the GDPR. In addition to the Privacy by Design and by Default procedures, these also include the procedure established for managing Data Breaches, the procedure for handling requests from data subjects, the procedure for appointing internal data processors, the training procedure, and the

data processor verification procedure.

WINDTRE complies with the Data Protection Authority's requirements in terms of authorisation for data processing, profiling, data enrichment, and data transfers. The company maintains regular contact and collaborates fully with the Data Protection Authority, and helps to define the best Privacy Protection practices in the field of telecommunications.

The Data Protection Authority

The company only underwent one inspection by the Data Protection Authority in 2019. This consisted of an assessment of the sales chain, and namely the activities carried out by one Agent in its capacity as an External Data Processor. Within the context of its responsibilities as Data Controller, WINDTRE has also heightened the supervision of its External Data Processors by enacting strict procedures and thorough processes, in order to guarantee total governance of the data under its control.

With regard to the commercial telephone calls not authorised by the recipients, WINDTRE's increasing attention to this phenomenon is demonstrated by continued decrease in the number of requests for information from the Data Protection Authority following complaints submitted to the Authority by customers. At any rate, replies are regularly submitted to the Data Protection Authority whenever requests for information are received following customer reports.

FIND OUT MORE IN THE APPENDIX



In compliance with the GDPR, the company implemented an **internal data processing register** by conducting specific interviews with over 100 of the company's organisational units. The register, which is rendered available for any requests made by the competent bodies, was updated during 2019 using an automated method, with the completion of about 180 questionnaires regarding each person designated or authorised to process data within the context of their own activities.

From the standpoint of the **security policies**, during the course of the year the company established and implemented processes and procedures aimed at protecting critical infrastructures in compliance with the new national security legislation, and namely with the "Measures for ensuring the security and integrity of the electronic communications networks and the reporting of significant incidents."

During the course of the year, new rules were issued for ensuring correct, informed and responsible access to the company's information systems. Furthermore, within the context of the activities carried out by Third Parties, the company issued a set of standards and indications to be referred to during the contract stipulation phase, in order to ensure compliance with the legal and IT security requirements during the execution of the relative activities, as well as the IT Security requirements that the Third Party will be required to meet in order to guarantee an adequate level of security.

With regard to **Cyber security**, the company continued its collaboration with the competent institutional authorities, as well as its review of the IT security management framework and the technical solutions designed to protect the customer's and the company's data and the systems used to process them. The company's **investments** in data and system security amounted to **nearly € 10 million** in 2019 alone.

In particular, WINDTRE worked to strengthen its risk prevention and mitigation processes by introducing the **Security by Design** concept into the application and system development cycles, which means establishing the requirements from the early design stages, and then implementing security criteria proportional to the level of exposure of the Company' and the Customers' data during the actual design of the solutions themselves.

With regard to preventive measures, the extension of the security criteria throughout the entire **supply chain** was also completed, with specific check lists being used to ensure that the selected suppliers also implement adequate data security measures.

In accordance with the long-term plan established in previous years, the processes aimed at identifying possible threats to data and IT equipment (**Cyber Intelligence activities**) were strengthened during 2019 through the continuous analysis of both the data extracted from "probes" on company

RESPONSIBILITY

systems and the warning bulletins about possible cyber threats on the Internet issued by domestic and international institutions.

With regard to security enhancement, the company also increased the level of software protection on the employees' workstations and at its proprietary shops, as well as on the systems accessible via the Internet that provide critical services to customers.

Another important area of focus was the improvement of the active protection of the company's data and assets. The **SOC (Security Operation Center)** plays a fundamental role in this regard, as it carries out ongoing and real-time threat protection and neutralisation activities using various monitoring and control systems, even involving the use of advanced data analysis and process automation technologies.

From this standpoint, the critical issue detection capabilities were expanded and developed, namely with the improved and expanded supervision of systems that "post" process data and events detected on the WINDTRE platforms and, by applying specific algorithms, emit alarms and automatically resolve them wherever possible (**SIEM**: Security Information and Event Management).



INCLUSION



NO ONE
SHOULD BE
LEFT
BEHIND



Digital technologies represent **an extraordinary inclusion opportunity** for the most disadvantaged. In fact, **accessibility** to a **fast, widespread** and **reliable network** even plays a decisive role in terms of well-being and **equal opportunities**.

Internet is becoming increasingly accessible, and will soon become available in less developed economies as well. 53% of the world's population currently has access to Internet, and this number continues to grow. Forecasts show that 90% of the world's population will have regular Internet access within just a few years' time.

One of the greatest challenges that the world is currently facing is the so-called **digital divide**, a form of discrimination that threatens to exclude part of the population from global social and economic progress due lack of access to new technologies.

DIGITAL
TECHNOLOGIES
AS A TOOL FOR
INCLUSION

Fighting the
"digital divide".
Providing
solutions and tools
able to ensure
well-being and
inclusiveness

The information society can be useful for breaking down many barriers. In fact, thanks to the possibilities offered by digital technologies, people who had been excluded up until recently can now participate in the social and economic life of their communities.

Thanks to accessible technological solutions, the spread of digital technologies can even help break down the social integration barriers of the most disadvantaged members of society. Just think of the ways in which technology can help disabled people make the most of their skills or help seniors overcome the “limitations” associated with ageing.

WomenHack

WINDTRE hosted the first ever “WomenHack” event in Rome, an initiative that promotes gender equality in the ICT&Tech sector, and helps women get in touch with companies dedicated to diversity at the workplace. This innovative Networking & Recruiting initiative was held on January 31 at the WINDTRE headquarters in Rome, where a hundred candidates were given the opportunity to meet with over ten ICT&Tech companies and find out more about the employment opportunities they had to offer. Through this event, which is organised by the San Francisco-based company “WomenHack”, WINDTRE aims to promote and support the inclusion of women in the IT sector.

In the words of Rossella Gangi, the WINDTRE Human Resources Director: “It was an important occasion for inter-company networking, where female professionals working in the IT sector could connect with companies offering concrete opportunities. WINDTRE has enthusiastically adhered to this initiative, which, in keeping with our company’s values, creates opportunities for dialogue and sharing, and is aimed at rewarding merit and reducing the gender gap in technological fields.”

DISABILITY MANAGEMENT

GRI 203-2a

In 2019 WINDTRE began paying greater attention to the inclusion of people with disabilities by appointing a **Disability Manager**. Paolo Berro, who was appointed to this position, is the company’s contact person for the management of disability issues and for the promotion of activities, projects and analyses aimed at improving the working conditions and the use of technological tools for people with disabilities, both inside and outside the company.

Paolo Berro himself suffers from quadriplegia as a result of an automobile accident in 1998. With a degree in mechanical and logistic engineering, he was hired by Wind in 2002, and has always been employed through teleworking, providing his services for the research and development departments. As a Knight of the Order of Merit of the Italian Republic for his social work and a special adviser to the vice-president of the European commission and commissioner for tourism and transport from 2011 to 2015, he’s one of the leading experts on disability and innovation, and is the author of numerous innovation projects on disability and accessibility.

Through the **Disability Hub**, a specifically created area on the company’s intranet, Paolo provides answers to his colleagues’ questions and promotes education and awareness on the issues of disability and supporting technologies.

In addition to requesting assistance through the Disability Hub, WINDTRE personnel can

also receive personalised assistance nationwide through the *Al Tuo Fianco* (“By Your Side”) service, which allows them to obtain assistance and professional advice dedicated to their own needs or those of their families. The service renders available a nationwide network of experts, who visit the requesting party at their home or workplace, and work with them to come up with the best possible solution, using their knowledge of the local social assistance services available.

BOLLATE PRISON

Research suggests that if detainees are inserted into training and work courses that offer real opportunities for professional growth during their periods of imprisonment, their chances of becoming repeat offenders once they’ve been released decrease considerably.

Bee4 is a social enterprise established in 2013 based the intuition and determination of a group of founders with a concrete social enterprise idea in mind.

Bee4 has been a partner of WINDTRE since July of 2016, and operates, in affiliation, within Milan’s Bollate prison. Bee4 was established to offer a concrete and serious response to the demand for skilled labour from people who have spent time in prison, with the ultimate goal of making prison a place from which one emerges a better person.

A MORE INCLUSIVE NETWORK

In addition to four staff members, WINDTRE currently employs a total of 21 people detained at the Prison.

The detainees are involved in three activities that have impacts on both the residential and business markets:

- **the digitalisation of paper documents** (faxes, registered mail, registered emails): the archive digitalisation service, which involves the preparation, scanning, indexing and storage of documents;
- **management of inbound technical support calls:** answering inbound calls from customers who need assistance with non-functioning terminals;
- **back office activities** linked to customer requests, e.g. deactivation of the users' lines.

During the course of 2019 the volumes of certain activities increased. These include, for example, the more frequent use of official communications in digital format, or via certified email, which has increased by about 40% over the past 12 months.

The global development of a more efficient and widespread network will bring about a series of significant developments. In fact, in addition to general improvements in terms of **efficiency, productivity** and **environmental sustainability**, it is also potentially capable of generating numerous benefits for certain segments of the population who are currently excluded. The disabled, people living in disadvantaged or more remote areas, individuals seeking employment or new opportunities, the elderly, and **small businesses** without access to the markets: all will see an increase in their possibilities for participation, opportunities, and access to services.

- For WINDTRE, promoting a more inclusive network means pursuing ideas and solutions that will allow for:
- greater participation in global growth by people located in remote or disadvantaged areas;
 - greater access to knowledge, skills and employment;
 - greater participation in civic life and education;
 - more business opportunities;
 - improved access to healthcare and public services.

WE'RE STRONGER TOGETHER

[GRI 203-1](#)

WINDTRE believes in the importance of **actively collaborating in the community**, and engages its customers and employees in solidarity initiatives that entail the company's active participation. In this regard, a series of activities have now become part of the corporate culture, and can be considered consolidated practices.

For many years now, WINDTRE has offered a **solidarity fund-raising service** to non-profit organisations, charities, associations, and foundations, in collaboration with the other Italian telecommunications service providers.

With this service, customers can donate the amount of € 2 by sending an SMS from their mobile phones, and can donate € 2, € 5 or € 10 by making a call from a landline. The funds raised are entirely transferred to the charity running the project supported.

In 2019, WINDTRE **collected and donated a total more than € 2.7 million to charity**, all in support of 113 social and humanitarian initiatives, including scientific research, child protection, support for developing countries, prevention of violence against women, and the protection of the natural environment [GRI 203-2a](#).

Charity SMS	2019	2018	2017
Number of initiatives supported (no.)	113	129	126
Total collected (millions of Euros)	2.75	2.7	3.5

Through the “**Solidale**” option, WINDTRE integrates social and environmental issues within its proposal to the customer. Each month, customers who take part in the initiative contribute 50 cents from their phone accounts to social support projects, and the company doubles each customer's donation

with another 50 cents. The funds raised are entirely transferred to the charity running the project supported.

Just as they did in 2018, WINDTRE and its customers once again supported the GenerAzione Mare Project in 2019: the WWF

campaign dedicated to protecting the Mediterranean and its indigenous species, like sea turtles, which are all too often threatened by human activities and by water pollution.

With the “**Insieme Si Può**” (*Together We Can*) initiative, in 2019 all the WINDTRE employees were once again engaged in proposing and voting on (through the corporate intranet) the solidarity initiatives eligible to receive a contribution from the company. It's a **method of joint charity selection** that allows the employees to propose and express their preferences for the initiatives they hold most dear.

The initiatives proposed are evaluated by a special Committee made up of Wind employees from the Legal, Finance, Regulatory and Compliance departments, which verifies the legal and organisational aspects of the non-profit proponents and the submitted projects' compliance with the initiative's regulations. During **the 2019 edition** - which was **particularly focused on social inclusion** - the evaluation activities conducted by the Committee resulted in the admission of 14 out of 19 projects submitted to a final vote on the company's Intranet.

After collecting nearly 3 thousand votes in one month, the four top-ranking projects, each of which received a grant from the company amounting to 8,000 Euros, were the following: **La fabbrica della gioia** (“The joy factory”), a creative and playful workshop for disabled children; **L'isola che c'è. Insieme senza**

barriere (“The real Neverland. Together without barriers”) for the creation of an interaction centre between able-bodied and disabled children; **Voglio andare a vivere in campagna** (“I want to go live in the countryside”) to fund the creation of a farm to give jobs to disabled people, and **(io) Riparo** (“I Remedy”) for the renovation of the plant nursery at the Bollate prison.

Another well-consolidated practice are the days dedicated to **blood donations** on the part of our personnel, which WINDTRE organises twice a year at its main offices (Rome, Milan, Ivrea and Pozzuoli), in collaboration of the Italian Red Cross and Avis. It's a small gesture that has a major impact, and a large number of the company's personnel are always happy to participate.

Remaining on the topic of healthcare, in May of 2018 nearly 700 WINDTRE employees also took part in the **Race For the Cure**, the fund-raising marathon dedicated to the fight against breast cancer and raising public awareness of the importance of prevention. WINDTRE made a matching donation equal to the same amount paid by its employees for their registrations.

The **Charity Days**, on the other hand, are days organised at our head offices and on-line in collaboration with various non-profit organisations. In addition to the sales organised for the Christmas and Easter holidays, our offices also hosted the sale of Unicef Orchids in March, and AISM Apples in October.



Year after year, the Sustainability Report bears witness to WINDTRE’s commitment to reporting to its stakeholders on the Group’s economic, social and environmental performance, in accordance with the consolidated practices already observed by Wind since 2003.

The information contained herein refers to the 2019 financial year (1 January – 31 December), and is compared to the relative 2018 and 2017 information, wherever possible [GRI 102-51 e GRI 102-52](#).. The economic and financial data and the main indicators are consistent with that which is contained in the reporting package that the company provides to its shareholder [GRI 102-1, GRI 102-45 e GRI 102-50](#).

This document has been prepared in accordance with the GRI Standards: Core option. The Global Reporting Initiative is considered the most widespread international standard for non-financial reporting. [GRI 102-54](#). The content that meets the requirements of the GRI standards is indicated within the text using a series of identification codes starting with “GRI”, contained within square brackets.

the digital innovation project for the SDGs [GRI 102-46, 102-47](#).

For the list of material issues covered by this document and their correlation with the GRI topics, please refer to the Appendix.

The collection of the information and the relative contents contained within this document have been prepared in collaboration with all the WINDTRE personnel, each for the activities of his/her own competence, thus providing a comprehensive and accurate flow of information, which in turn has ensured the validity of the reporting model adopted. The External Affairs & Sustainability Department coordinated the project, thus ensuring consistent results.

The index of the GRI *disclosures* reported can be found at the end of this document. For further details on the contents reported and the calculation methods, please refer to the Appendix. For any further information or clarifications you may require, please contact the WINDTRE CSR function at the following addresses [GRI 102-53](#):

In order to identify the non-financial issues most relevant to the Group, a materiality analysis was carried out, which entails the establishment of a threshold beyond which an issue acquires a level of importance that must be reported [GRI 102-46, GRI 102-49](#).

The issues have been identified taking into account the aspects of the scenario that have the greatest impact upon our sector, the sustainability communications of the key players at the national and international levels, and the interests and expectations of our stakeholders, with whom we interact through numerous listening and engagement initiatives, and the management’s point of view. Starting from a first shortlist of potentially relevant issues, in 2017 we focused upon those deemed to be truly material based on the significance of the impacts generated during the performance of our business activities, and the significance perceived by our stakeholders [GRI 102-29](#). As foreseen by the reference guidelines, the material issues identified were then integrated as new scenario elements, along with the stakeholder feedback linked to

SECTIONS	THE ISSUES THAT MATTER	SDGs
WINDTRE, ITALY’S LARGEST NETWORK	Network reliability and coverage. Customer Care and Customer Satisfaction Transparency and responsible marketing	 
PEOPLE	Attention to our people	   
EDUCATION	5G for the cities of the future Education for the future Innovation and open innovation	  
LIFE	Reduction of CO ₂ emissions and smart technologies	   
RESPONSIBILITY	Privacy and data security	  
INCLUSION	Diversity and equal opportunity	   

GRI Content Index “in Accordance-Core” Option

“Materiality Disclosures Service Organizational Mark”

For the Materiality Disclosures service, the GRI reviewed that the GRI Content Index is clearly presented and the references for Disclosures 102-40 to 102-49 align with appropriate sections in the body of the document. The Materiality Disclosures service was carried out by the GRI on the document written in italian.



GRI 101: Foundation 2016
GRI 102: General Disclosures 2016

GENERAL STANDARD DISCLOSURES			
General Standard Disclosures	Description	Chapter/section	
ORGANISATION PROFILE			
102-1	Organisation name	WINDTRE Italy's Largest Network	p. 13
102-2	Business, brands, products and services	WINDTRE Italy's Largest Network	p. 14
102-3	Location of headquarters	Technical Appendix - Responsibility	p. 122
102-4	Location of operations	WINDTRE Italy's Largest Network	p. 14
102-5	Ownership and legal form	Technical Appendix - Responsibility	p. 122
102-6	Markets served	The future that awaits us Towards a new paradigm in the TELCO sector	p. 49
102-7	Scale of the organisation	Executive Summary	p. 5
102-8	Information on employees and other workers	Technical Appendix - People	p. 116-117
102-9	Supply chain	Responsibility Total Quality Management - The supply chain Technical Appendix - Responsibility	p. 85 p. 123
102-10	Significant changes to the organisation and its supply chain	Responsibility Total Quality Management - The supply chain	p. 85
102-11	Precautionary principle or approach	Responsibility Total Quality Management - The supply chain	p. 85
102-12	External initiatives	Responsibility	p. 80
102-13	Membership of associations	- ASSTEL, the Confindustria organisation that represents telecommunications companies; - CONSEL, the ELIS Consortium for higher professional training, whose primary goal is to support young people in their transition to the world of employment. The Service Providers are no longer part of FUB's founding partners for reasons relating to the institution's compliance. FUB is an In-House foundation of the Italian Ministry of Education, Universities and Research (MISE).	

General Standard Disclosures	Description	Chapter/section	
STRATEGY			
102-14	Statement from senior decision-maker	Letter to stakeholder	p. 3
102-15	Key impacts, risks, and opportunities	The future that awaits us Towards a new paradigm in the TELCO sector	p. 49
ETICA E INTEGRITÀ			
102-16	Values, principles, standards, and norms of behaviour	Responsibility Corporate governance	p. 47
102-17	Mechanisms for advice and concerns about ethics	Responsibility Management of Reporting - Whistleblowing	p. 48
GOVERNANCE			
102-18	Governance structure	Technical Appendix - Responsibility	p. 123
102-22	Composition of the highest governance body and its committees	Technical Appendix - Responsibility	p. 123
102-23	Chair of the highest governance body	Technical Appendix - Responsibility	p. 123
102-29	Identification and management of the economic, environmental and social impacts	The origins of this document	p. 101-103
STAKEHOLDER ENGAGEMENT			
102-40	List of stakeholder groups	Technical Appendix - The origins of this document	p. 125
102-41	Collective bargaining agreements	Technical Appendix - People	p. 116
102-42	Identifying and selecting stakeholders	Technical Appendix - The origins of this document	p. 125
102-43	Approach to stakeholder engagement	Technical Appendix - The origins of this document	p. 125
102-44	Key topics and concerns raised	Technical Appendix - The origins of this document	p. 125
REPORTING			
102-45	Entities included in the consolidated financial statements	The origins of this document	p. 100
102-46	Defining report content and topic boundaries	The origins of this document	p. 101
102-47	List of material issues	The origins of this document Technical Appendix - The origins of this document	p. 101 p. 128
102-48	Restatements of information	The data referring to years prior to 2019 have not changed with respect to those published during the previous years, with the exception of the data regarding the reduction of greenhouse gas emissions, which changed due to the updating of the conversion factors utilised..	
102-49	Changes in reporting	The origins of this document	p. 101
102-50	Reporting period	The origins of this document	p. 100
102-51	Date of the most recent report	The origins of this document	p. 100
102-52	Reporting cycle	The origins of this document	p. 100
102-53	Contact point for questions regarding the report	The origins of this document	p. 100
102-54	Claims of reporting in accordance with the GRI Standards	The origins of this document	p. 101
102-55	GRI content index	Technical appendix - GRI index	p. 102-106
102-56	External assurance	The 2019 Sustainability Report was not subjected to external verification.	

SPECIFIC STANDARD DISCLOSURES			
Disclosures	Description	Chapter/section	
NETWORK RELIABILITY AND COVERAGE			
GRI 103: Management Approach 2016			
103-1	Explanation of the material topic and its boundary	WINDTRE, Italy's Largest Network Technology and coverage	p. 16
103-2	The management approach and its components		
103-3	Evaluation of the management approach		
GRI 203: Indirect Economic Impacts 2016			
203-1	Infrastructure investments and services supported	WINDTRE, Italy's Largest Network Technology and coverage	p. 16
ATTENTION TO OUR PEOPLE			
GRI 103: Management Approach 2016			
103-1	Explanation of the material topic and its boundary	People Skill development Future Leaders Performance Development	p. 38 p. 40 p. 41
103-2	The management approach and its components		
103-3	Evaluation of the management approach		
GRI 401: Employment 2016; GRI 403: Occupational Health & and Safety 2016; GRI 404: Training and Education 2016			
401-1	New employee hires and employee turnover	Technical Appendix - People	p. 116
403-2	Hazard identification, risk assessment, and incident investigation	People Workplace	p. 43
404-2	Programs for upgrading employee skills and transition assistance programs	Skill development	p. 38
CITIES OF THE FUTURE			
GRI 103: Management Approach 2016			
103-1	Explanation of the material topic and its boundary	The future that awaits us Our contribution to the 2030 Agenda	p. 54
103-2	The management approach and its components		
103-3	Evaluation of the management approach		
GRI 203: Indirect Economic Impacts 2016			
203-1	Infrastructure investments and services supported	WINDTRE, Italy's Largest Network Technology and coverage The future that awaits us Our contribution to the 2030 Agenda	p. 16 p. 54

Disclosures	Description	Chapter/section	
CUSTOMER CARE AND CUSTOMER SATISFACTION			
GRI 103: Management Approach 2016			
103-1	Explanation of the material topic and its boundary	WINDTRE, Italy's Largest Network Much closer	p. 31
103-2	The management approach and its components		
103-3	Evaluation of the management approach		
GRI 203: Indirect Economic Impacts 2016			
203-1	Infrastructure investments and services supported	WINDTRE, Italy's Largest Network Much closer	p. 26
EDUCATION FOR CHANGE			
GRI 103: Management Approach 2016			
103-1	Explanation of the material topic and its boundary	Education	p. 59
103-2	The management approach and its components		
103-3	Evaluation of the management approach		
GRI 203: Indirect Economic Impacts 2016			
203-1	Infrastructure investments and services supported	Education	p. 59
INNOVATION AND OPEN INNOVATION			
GRI 103: Management Approach 2016			
103-1	Explanation of the material topic and its boundary	Education	p. 59
103-2	The management approach and its components		
103-3	Evaluation of the management approach		
GRI 203: Indirect Economic Impacts 2016			
203-1	Infrastructure investments and services supported	The future that awaits us Our contribution to the 2030 Agenda Education Inclusion We're stronger together	p. 54 p. 58 p. 97
PRIVACY E SICUREZZA DEI DATI			
GRI 103: Management Approach 2016			
103-1	Explanation of the material topic and its boundary	Responsibility Data protection	p. 87
103-2	The management approach and its components		
103-3	Evaluation of the management approach		

Disclosures	Description	Chapter/section	
REDUCTION OF CO ₂ EMISSIONS AND SMART TECHNOLOGIES			
GRI 302: Energy 2016; GRI 305: Emissions 2016			
103-1	Explanation of the material topic and its boundary	Life Energy consumption	p. 67
103-2	The management approach and its components		
103-3	Evaluation of the management approach		
GRI 302: Energia 2016			
302-1	Energy consumed within the organisation	Technical Appendix - Life - Energy consumption	p. 67
302-4	Reduction of energy consumption	Technical Appendix - Life - Partnership with the WWF to reduce atmospheric emissions	p. 120
GRI 305: Emissions 2016			
305-1	Direct (Scope 1) GHG emissions	Technical Appendix - Life - Energy consumption	p. 121
305-2	Energy indirect (Scope 2) GHG emissions	Technical Appendix - Life - Energy consumption	p. 121
305-5	Reduction of GHG emissions	Technical Appendix - Life - Partnership with the WWF to reduce atmospheric emissions	p. 120
TRANSPARENCY AND RESPONSIBLE MARKETING			
GRI 103: Management Approach 2016			
103-1	Explanation of the material topic and its boundary	WINDTRE, Italy's Largest Network We like to be clear	p. 30
103-2	The management approach and its components		
103-3	Evaluation of the management approach		
GRI 417: Marketing and Labelling 2016			
417-3	Incidents of non-compliance concerning marketing communications	Technical Appendix - WINDTRE, Italy's Largest Network	p. 110



APPENDIX

A YEAR IN NUMBERS



This Appendix has been drawn up as a supplement to the 2019 WINDTRE Sustainability Report.

It provides details on the methodologies used for data collection and for the calculation of the quantitative indicators, as well as some detailed information about the indicators themselves.

For any further information or clarifications you may require, please contact the WINDTRE CSR Department at the following email address: corporatesocialresponsibility@windtre.it

Reference between the contents of this Appendix and the Report texts:

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WINDTRE
THE NETWORK
THAT BRINGS US CLOSER

MUCH CLOSER

We like to be clear

Non-compliance disputes relating to marketing communications GRI 417-3	2019	2018	2017
Non-compliance disputes resulting in fines or penalties (no.)	0	1	0
Non-compliance disputes resulting in reprimands (no.)	1	0	0
Non-compliance disputes resulting in voluntary commitments (no.)	1	1	3

Communication channels

The WINDTRE contact centres:

- 8 for business customers
- 15 for retail customers

The contact centres have dedicated numbers based on customer categories:

- **1928:** WINDTRE BUSINESS
- **155:** Wind landline and mobile
- **139:** 3 Business
- **133:** 3 Retail

Customer Care

The company keeps the quality of the customer communication services under constant control by regularly monitoring certain key indicators, such as the perceived quality of the Customer Care service, and the customer service's Net Promoter Score. The quality of the Customer Care service is essential to the company's marketing and sales strategies: in fact, the proper management of the same allows the company to maintain the loyalty of its customers and the good relations that it has instilled with them,

and consequently fosters the company's growth and development. With this in mind, therefore, WINDTRE has chosen to dedicate the utmost attention to its customer relations. The main goal of WINDTRE's Customer Care management is to offer customers a positive and seamless experience in terms of the information and support provided through the various channels of contact, and according to a holistic approach, in order to ensure that the customers feel that they are being heard, and receive support in a fast, efficient, and kind manner.

Customer support service		2019	2018	2017
Contact by telephone (no.)	Business	1,531,256	1,829,907	1,988,274
	Retail	26,925,442	36,424,497	40,558,945
	Total	28,456,698	38,254,404	42,547,219
Support requests received by the specialised technical assistance groups (no.)	Business	348,053	348,487	319,096
	Retail	3,452,840	4,377,023	4,358,724
	Total	3,800,893	4,725,510	4,677,820

Social network

WINDTRE boasts a diversified presence on all the major social platforms, with the goal of promoting awareness, engagement and performance. We began streamlining our presence on these platforms in July of 2019:

- the Wind and Tre consumer retail brands now have their own Facebook and Instagram pages
- the WINDTRE BUSINESS brand communicates through the LinkedIn platform
- the WINDTRE company brand has two institutional platforms on Twitter and LinkedIn

The streamlining of our presence on these platforms has also led to a different media strategy, especially on social networks with strong commercial leanings, like Facebook and Instagram, with a consequent reduction in structured campaigns dedicated to sponsored activities. This has allowed us to develop more focused and effective relationships with customers, with better control over interaction and comments, and with a significant improvement in sentiment. We've also established important partnerships with social influencers, including The Jackal, with whom we have produced two IG story campaigns and two Branded Content Videos.

In fact, that which was posted at Christmas gained over 5 and a half million views. The Wind social media channels supported the launch of the Winday program by conducting “performance” campaigns, the goal of which was to promote the installation of the app, with an structured editorial plan that explored all the program’s functions, and involved the use of influencers from The Jackal. From a performance standpoint, the group conducted sponsored Campaigns, with the goal of supporting the sale of the online promotions, and Awareness Campaigns, which focused upon the ethnic target and network consolidation.

During the course of 2019, the LinkedIn channel was strategically improved with dedicated formats for thematic areas, and with editorial content useful for supporting Corporate/ Institutional communications. The Neoconnessi project, whose educational goal is focused upon promoting digital culture, and namely Internet security for young people, was present on all the digital channels. The local business was further developed through local awareness campaigns on Facebook, which were aimed strengthening collaboration with the territory thanks to the creation of a simple and intuitive tool.

Social media followers (millions)	2019	2018	2017
Wind Facebook	1,397,466	1,378,443	1,289,059
H3G Facebook	961,517	966,412	939,650
Wind Twitter	121,695	122,740	123,365
H3G Twitter	165,860	166,672	174,097
Wind Instagram	23,200	18,400	0
H3G Instagram	35,100	35,000	0
Wind G+	0	33	0
H3G G+	0	113	0
Wind Youtube	44,300	39,237	0
H3G Youtube	17,400	17,000	0
Wind Tre Official Twitter	3,653	2,829	0
Wind Tre LinkedIn	26,441	17,169	0
Wind Tre Business FB	0	15,034	0
Wind Tre Business Twitter	0	460	0
Wind Tre Business LinkedIn	1,455	406	0

Customer satisfaction

In 2019 the company once again measured its level of customer satisfaction on a scale of 10 to 100 by conducting telephone surveys specific to each market, carried out by an independent external company. The survey was conducted

on a quarterly basis with 1,000 interviews of Mobile Consumer customers, using a sample of customers by geographic area, type of contract (pre-paid or subscription), nationality, data usage mode, and contract duration.

Results of the Mobile Consumer Customer Satisfaction analyses (Scale from 10-100)	The Wind Brand			The 3 Brand		
	2019	2018	2017	2019	2018	2017
Overall satisfaction	77.8	79.2	78.4	77.7	76.1	75.1
Rates	76.1	78.3	79.3	79.1	77.7	77.4
CVM	70.1	75.2	80	73.3	70.6	70.3
Customer Care Services	75.8	76.5	81.6	77.4	74.7	74.8
IVR - Interactive Voice Response	73.5	72.5	74.2	74.6	69.7	67
Call Centre operator	79	79.5	88.5	79.9	78.2	84.3
Customer loyalty	82.4	83.6	86.9	82.3	81.7	85.9
Tendency for “word of mouth” recommendations	77.9	80.1	76.7	77.4	75.6	73.4
Advertising effectiveness	80.5	80.1	78.2	77.5	76.5	72.5

The pursuit of shared solutions

Mediation proceedings/Disputes handled before Corecom/AGCom		2019	2018	2017
Mediation requests submitted to the Co.re.coms				21,116
Solution agreed between the parties				78%
User request for the Authority or the Co.Re.Coms to resolve the dispute	no.	3,027	2,175	2,207
	%	11%	8%	10%
Richiesta dell'utente all'Autorità o ai Co.Re.Com di adozione di un provvedimento d'urgenza	no.	2,828	2,481	2,453
	%	11%	9%	12%
Total		32,263	32,754	25,776

Consumer Association Complaints¹ and Joint mediation requests		2019	2018	2017
Complaints from Consumer Associations (no.)		7,032	7,056	8,000
Joint mediation requests (no.)		4,204	3,764	3,825
Claims managed (no.)		4,011	3,723	3,357
Claims with a positive outcome	no.	3,751	3,482	3,180
	%	94%	94%	95%

Litigation with customers		2019	2018	2017
Pending as of 31/12/19		13,206	12,131	9,069
Favourable judgements (%)		68%	66%	65%

PEOPLE

Information on employees and other workers [GRI 102-8](#)

The following personnel data for 2019 refer to the companies Wind Tre S.p.A., Wind Tre Italia S.p.A., 3Iettronica Industriale S.p.A. and Wind Retail. The same scope was considered for 2018 and 2017.

As of 31/12/2019, WINDTRE's total work force amounted to 6,957 individuals. The spontaneous and facilitated turnover rate recorded during the course of the year was in line with the workforce optimisation rate of the previous year. In keeping with the previous years, almost all of the employees have the open-ended contracts. 79% of the employees have full-time contracts.

Part-time contracts are mainly requested by female workers. 48% of the company's workforce consists of women. All of the company's employees are subject to a collective labour contract negotiated with the union organisations [GRI 102-41](#). The characteristics of the company's population do not vary over the course of the year, as WINDTRE's activities are not subject to any significant seasonal changes [GRI 102-8e](#). The non-employee workers, who constitute a small minority, mainly consist of consultants tasked with sales activities at the Wind Retail brand shops [GRI 102-8d](#). In terms of breakdown by contractual level, the workforce's consistency remains in line with the previous years.

Distribution of employees by contract duration (no.)	2019			2018			2017		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Open-ended	3,601	3,350	6,951	3,641	3,239	6,880	3,722	3,357	7,079
Fixed-term	3	3	6	5	2	7	7	4	11
Total	3,604	3,353	6,957	3,646	3,241	6,887	3,729	3,361	7,090

Changes in the workforce (new hires and terminations) GRI 401-1	2019	2018	2017
New hires (no.)	120	85	87
Terminations (no.)	294	289	2,347
Change (%)	4.23%	4.20%	33.10%

Following the ruling issued by the Law Courts of Milan, which nullified the sale of the "Call Center 133" business unit in 2017, 244 employees were re-admitted to service during the course of 2019.

Distribution of employees by work hours (no.)	2019			2018			2017		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Full-time	3,381	2,109	5,490	3,463	2,176	5,639	3,536	2,245	5,781
Part-time	223	1,244	1,467	183	1,065	1,248	193	1,116	1,309
Total	3,604	3,353	6,957	3,646	3,241	6,887	3,729	3,361	7,090

Incidence of non-employee workers (%)	2019	2018	2017
Non-employees / Employees	1.75%	2.80%	2.30%

Distribution of the workforce by contractual level	2019		2018		2017	
	Total (no.)	%	Total (no.)	%	Total (no.)	%
White collar	6,133	88%	6,307	88%	6,209	88%
Supervisors	681	10%	695	10%	711	10%
Management	143	2%	155	2%	170	2%
Total	6,957	100%	6,887	100%	7,090	100%

Female incidence by contract level (%)	2019	2018	2017
White collar	51%	50%	51%
Supervisors	26%	25%	26%
Management	23%	22%	22%
Total	48%	47%	47%

LIFE

ENERGY CONSUMPTION

Types of energy consumption from fossil fuel sources by WINDTRE GRI 103-1, 103-2 e 103-3	Direct consumption and emissions (Scope 1)	Indirect consumption and emissions (Scope 2)
Network infrastructures	Diesel to power the generators	Electricity purchased from third parties
Civil sites (offices, call centres, shops)	Diesel and natural gas to power the generators and boilers required for heat or electricity	Electricity purchased from third parties
Transport	Fuel for proprietary or leased vehicles	

Energy consumption (GJ)	2019	2018	2017	
Consumption of fuel from non-renewable sources	25,803	27,476	26,746	GRI 302-1 a
Consumption of fuel from renewable sources	1,328	2,201	2,821	GRI 302-1 b
Electricity consumed	2,927,882	2,955,123	3,136,679	GRI 302-1 c i
Heating energy consumed	4,607	4,850	5,116	GRI 302-1 c ii
Cooling energy consumed	n,d,	n,d,	n,d,	GRI 302-1 c iii
Steam consumed	0	0	0	GRI 302-1 c iv
Total	2,959,620	2,989,650	3,171,361	GRI 302-1 e

Greenhouse gas emissions (Tonnes of CO ₂ eq.)	2019	2018	2017	
Direct (Scope 1)	9,409	10,010	9,781	GRI 305-1 a-b
Direct biogenic (Scope 1)	-	-	-	GRI 305-1 c
Indirect location-based (Scope 2)	231,628	252,909	268,447	GRI 305-2 a-c
Indirect market-based (Scope 2)	-	-	-	GRI 305-2 b-c
Total	241,037	262,919	278,229	

Energy efficiency projects

Improvement of energy efficiency: no. of BTS with energy saving technologies (no.)	2019	2018	2017
BTS with solar or wind energy	1	1	2
BTS with free-cooling technology	2,818	2,524	2,482
Outdoor BTS	14,026	13,566	12,544
BTS with energy saving technologies	16,626	13,273	13,325

TOGETHER FOR THE ENVIRONMENT

Partnership with the WWF to reduce atmospheric emissions

Energy saved (GJ)	2019	2018	2017	
Energy saved	49,240	84,088	163,245	GRI 302-4 a

“Reduction of greenhouse gas emissions (Tonnes of CO ₂ eq)”	2019	2018	2017	
For the improvement of energy efficiency (Scope 2)	4,214	7,197	13,971	GRI 305-5

METHODOLOGICAL NOTE

Electric energy consumption

The electricity consumption data include an estimate of the consumption data attributable to WINDTRE for the sites shared with other service providers. This calculation includes an estimate of the consumption attributable to the company Galata S.p.A. (now Cellnext) for the services offered to WINDTRE. The direct consumption amount relating to electricity generated through the consumption of diesel fuel (generators) was estimated considering the generators’ hypothetical days of use (maximum budget hypothesis) during the year in question, multiplied by the estimated average daily consumption (kWh consumed per day, which was equal to 63kWh). Conversion factors utilised [GRI 302-1g](#):

- Litre of diesel/kWh: 2.08470722036353;
- Cubic metre of natural gas/kWh: 8.568;
- kWh/GJ: 0.0036.

Energy saved

The energy saved is calculated based on the energy efficiency certificates (TEE) that reached maturity during the year in question for the modernisation and efficiency improvement activities carried out upon the Base Transceiver Stations (BTS), which have been in progress since 2012 [GRI 302-4d](#). The conversion factor utilised was equal to 2,752kWh (9.9 GJ) for each TEE. Up until 2017, the calculation of the energy saved was based on the year that the TEEs were obtained, rather than the year they reached maturity. As a result, the 2017 values included in the previous reports were recalculated based on the new criterion.

Greenhouse gas emissions

[GRI 305-1g](#), [GRI 305-2g](#)

- Since the approach for the consolidation of Scope 1 and Scope 2 emissions is financial and operational control, all the emissions of WINDTRE’s subsidiaries are attributed to WINDTRE itself [GRI 305-1f](#), [GRI 305-2f](#).
- The calculation of the **Scope 1 (direct) emissions** includes the emissions from the company’s direct energy consumption. In particular:
 - Direct fuel consumption: Petrol, Diesel, LPG, Natural Gas, and Biofuel (consumption related to generators, heating, canteen stoves, and the company’s proprietary fleet of vehicles)
 - Release of Refrigerant Gases: (air conditioning unit/refrigerator refills)
- The calculation of the **Scope 2 (indirect) GHG emissions** includes the emissions from the company’s indirect energy consumption.

In particular:

- Electricity consumption
- Consumption related to district heating
- Consumption related to district cooling
- Consumption related to the purchase of steam

In particular, for the calculation of the greenhouse gas emissions, the organisation takes into account the sum of the CO₂ emissions, and adds the emissions of any other gasses (e.g. CH₄ and N₂O), expressed as CO₂ equivalent.

- The GWP utilised for CH₄ is equal to 21, while for N2N it is equal to 310. [GRI 305-1e](#) [GRI 305-2e](#)
- For the calculation of the indirect greenhouse gas emissions from fuel, an emission factor (kg of CO₂ equivalent emitted per MJ of fuel consumed) of 12,500 Kg/millions of MJ was utilised.

In particular, for the calculation of the indirect emissions from electricity, an emission factor (gCO₂ emitted per kWh utilised) of 518.45 gCO₂/kWh was utilised, source: IEA CO₂ Emission from Fuel Combustion, OECD/IEA, Paris, 2016.

The conversion values applied for the calculation of the GHG emissions are shown below.

Description	CO ₂ Coefficient			
	Unit	2019	2018	2017
Electrical consumption	kWh	284.8	308.1	308.1
Diesel, heating, generation, haulage	Litres	2.65		
Natural gas, heating and haulage	m ³	1.972		
Gasoline	Litres	2.38		

“The electricity conversion factors are obtained from Table 2.4 of the ISPRA publication: atmospheric emission factors of CO₂ and other greenhouse gasses in the electrical sector, 2018. The emission coefficient of electricity consumption is determined from the generation percentages of Italy’s electricity production over the years. “

RESPONSIBILITY

CORPORATE GOVERNANCE

WINDTRE’s governance system is structured according to the traditional model with an administrative body (Board of Directors) and a control body (Board of Statutory Auditors). The Board of Directors is appointed by the Shareholders’ Meeting, in accordance with the law. The attribution (and revocation) of the powers of the Directors is reserved to the Board, which defines its object, limits and methods of exercise. The delegations and powers attributed to the Chief Executive Officer include the overall responsibility of the Company and of the administration activities, as well as the organizational responsibilities for ensuring the management and development of the business. The current system of delegation of powers to the CEO reports and their collaborators provides for a joint signature method.

Eight (8) meetings of the WINDTRE Board of Directors were held in 2019. The Group’s registered offices and main operational headquarters are located at no. 5 Largo Metro, Rho (MI) Italy [GRI 102-3](#). The company also has another large operational facility at no. 48 Via Cesare Giulio Viola, Rome, Italy. The company’s share capital, which amounts to € 474,303,795 (fully paid), is 100% owned by Wind Tre Italia S.p.A., which in turn is entirely controlled (100%) by VIP-CKH Luxembourg S.à r.l. [GRI 102-5](#). In turn, WINDTRE holds all the shares Italy in CKH Networks Italia, Wind Retail and 3Lettronica Industriale, and holds several minority stakes in other companies.

WINDTRE subsidiaries and affiliates as of 31/12/2019	Company/Consortia registered offices	Percentage of share capital/consortium fund held by WINDTRE
3Lettronica Industriale S.p.A.	Italy	100%
Wind Retail s.r.l.	Italy	100%
CKH Networks Italia S.p.A.	Italy	100%
Mix s.r.l.	Italy	9.75%
CONSEL - Consorzio ELIS a r.l.	Italy	1%
Janna S.c.ar.l.	Italy	17%
QXN società consortile	Italy	10%

[GRI 102-18](#), [GRI 102-22](#), [GRI 102-23](#)

The Wind Tre S.p.A. Board of Directors consists of six members:

- **Fok Kin Ning Canning** (Chairman);
- **Jeffrey Alan Hedberg** (CEO);
- **Christian Nicolas Roger Salbaing** (Board Member);
- **Frank John Sixt** (Board Member);
- **Edith Shih** (Board Member);
- **Stefano Invernizzi** (Board Member).

The Chairman of the Board of Directors is vested with the powers provided by law and the company’s articles of Association with regard to the authority to represent the company and the functioning of its governing bodies. No Executive Committees have been set up pursuant to Art. 2381 of the Italian Civil Code.

The Wind Tre S.p.A. Board of Statutory Auditors, or rather the company’s internal management control body, consists of 3 standing auditors and two alternate auditors:

- **Marcello Romano** – Chairman of the Board of Statutory Auditors;
- **Roberto Colussi** – Standing auditor;
- **Luca Occhetta** – Standing auditor;
- **Fabio Carusi** – Alternate auditor;
- **Giuseppe Tarantino** – Alternate auditor.

The selection of the members of the Board of Directors and the Board of Statutory Auditors is carried out with the approval of the ultimate shareholder, CK Hutchison Holdings Ltd, in accordance with the Group’s rules of corporate governance. With regard to the board of directors, the general meeting has not resolved any form of compensation.

TOTAL QUALITY MANAGEMENT

The supply chain

Suppliers GRI 102-9 e 102-10	2019	2018	2017
Qualified suppliers (no.)	736	410	474
Qualified suppliers located in Italy (no.)	660	365	442
Active suppliers (no.)	736	410	474
Amount ordered (in millions of€)	2,174	1,987	1,795

Disputes with suppliers (no.)	2019	2018	2017
Number of disputes with suppliers	5	5	6

DATA PROTECTION

Inspections by the Data Protection Authority (no.)	2019	2018	2017
Number of inspections	1	2	2

Data processing operations	2019	2018	2017
Data Processing Register (no.)	170	150	2

Privacy-related checks on suppliers (no.)	2019	2018*	2017
On-site audits	6	6	7
Verification questionnaires administered to external suppliers	614	118	198
Verification questionnaires administered to sales agents	180	724	746

* since 2018, the supervisory process has been carried out starting in July of the year in question, and ends after a calendar year (June of the following year). The exported data for 2018 are for a six month period

THE ORIGINS OF THIS DOCUMENT

WINDTRE’s relationships with the people and organisations directly or indirectly involved in its activities are of enormous value to the company: in fact, the loyalty and cooperation of others are crucial for ensuring continuous improvement and for implementing projects of common interest.

The stakeholders are those who have legitimate expectations from WINDTRE, or can have an impact on the company’s operations [GRI 102-42](#). The following image shows the WINDTRE stakeholders grouped into categories [GRI 102-40](#). The company maintains regular relationships and dialogues with its stakeholders. The contact takes place in different ways, and at different frequencies, depending on the categories concerned. Some initiatives are organised specifically in view of the preparation of the Sustainability Report and the Integrated Management System. Starting with the launch of the Digital Innovation project for the SDGs in 2018, WINDTRE began a structured process of listening to its stakeholders, which entails their direct involvement in the construction of scenarios and solutions to help achieve the objectives of the Global Agenda. Most of the discussion and dialogue, however, falls within the scope of the customary practices of discussion and cooperation, regardless of the reporting activities [GRI 102-43](#).

The following table shows the regular interactions with stakeholders conducted in 2019, and the topics that are most important to each stakeholder category. The stakeholders to be engaged in the initiatives were selected based on their importance to the activities performed by the company. [GRI 102-42](#), [GRI 102-44](#)

Stakeholder	Topics of greatest interest	Main initiatives for dialogue and engagement
Environment <ul style="list-style-type: none">• Ecosystem• Ministry of the Environment• Environmental Associations• Specialised agencies (e.g. ARPA, APAT)	Reduction of CO ₂ emissions Energy savings Consumption of clean and renewable energy	WINDTRE in partnership with WWF Italia for the assessment of CO ₂ emissions and for energy saving initiatives Digital innovation for the SDGs GenerAzione Mare

Stakeholder	Topics of greatest interest	Main initiatives for dialogue and engagement
Shareholders and bondholders <ul style="list-style-type: none">• CK Hutchison Ltd and its Management	Economic results Corporate governance Market trends Corporate strategy	Shareholder meetings Periodic conference calls and meetings with investors Ad hoc meetings at conferences organised by banks or other institutions Group ESG data collection
Customers and Consumer Associations <ul style="list-style-type: none">• Consumers and MicroBusiness Customers• Business Customers• Public Administration• Consumer Associations”	Customer satisfaction Transparency and responsible marketing Privacy and data security Network reliability and coverage Safety of young people on the Internet Digital inclusion Technological innovation for the new generations	Customer satisfaction surveys Customer service and other initiatives for dialogue with Consumer Associations The Social Networks Contact Center Conciliaweb
The Public <ul style="list-style-type: none">• Territorial and local communities• Tertiary Sector (non-profits, NGOs, etc.)• Universities and Research Institutes• Media and opinion leaders	Privacy and data security Innovation and open innovation Support for solidarity initiatives Local investments Transparency	Education for change (e.g. Generazioni Connessi, Safer Internet Day, NeoConnessi, Una Vita da Social) Partnership with Luiss Enlabs Insieme si può (Together we can) Social networks The Wind Solidarity Option Digital innovation for the SDGs - Stakeholder feedback and engagement meetings

Stakeholder	Topics of greatest interest	Main initiatives for dialogue and engagement
Financial community <ul style="list-style-type: none">• Banks• Institutional investors• Private investors• Financial analysts• Rating agencies”	Economic results and their sustainability Legal compliance Corporate governance Transparency Market trends Corporate strategy	Periodic conference calls and meetings with investors Ad hoc meetings at conferences organised by banks or other institutions
Suppliers and commercial partners <ul style="list-style-type: none">• Suppliers of goods and products• Suppliers of services• Sub-suppliers of goods and products• Direct and indirect sales network”	Compliance with the contractual commitments Continuity of the relationship Innovation and open innovation	WINDTRE Convention Supplier audits Ethical risk assessment of suppliers Privacy compliance checks Partnership initiatives
Institutions <ul style="list-style-type: none">• Regular authorities (Privacy, Antitrust, etc.)• National and local government institutions (Ministry of Communications, Local authorities, etc.)• Judicial and Prosecutorial Offices• Bodies of the Judicial Authorities (Police Forces)• Civil Protection Authority	Network reliability and coverage Privacy and data security Legal compliance	Ongoing dialogue with local, domestic and European institutions on all issues relating to Tlc and digital innovation Specific working round-tables (e.g. 5G, Safer Internet Centre, etc.)

Stakeholder	Topics of greatest interest	Main initiatives for dialogue and engagement
WINDTRE Personnel <ul style="list-style-type: none">• Employees• External collaborators• Union Representatives and Organisations”	Economic results	Corporate communities (e.g. #diciamolanostra)
	Skill assessment	Events (e.g. #beleaders)
	Work/private life reconciliation	Pathways for the engagement of new talents (e.g. Future Land, OnStage)
	Equal opportunities	Engagement Survey
	Workplace health and safety	Training
	Transparency	Whistleblowing

The issues that were determined to be the most relevant for the company and its stakeholders are shown in the following table [GRI 102-47](#).

Issue	Description	Corresponding GRI Standards aspect
Network reliability and coverage	A reliable and extensive network is necessary for the provision of all the telecommunications services (voice and data), and makes a significant contribution to the perception of the service quality received.	GRI 203: Indirect economic impacts
Attention to our people	WINDTRE aims to gradually improve the level of personal well-being within the organisation itself, as well as to constantly improve the quality of dialogue with its employees. The company takes people's changing needs into account through welfare programs and high standards of workplace health and safety.	GRI 401: Employment GRI 403: Workplace Health and Safety GRI 404: Training”
5G for the cities of the future	Given that it plays a key role thanks to its experimentation with 5G technology, WINDTRE has decided to concentrate on the future of our cities, with the aim of reflecting on how a smart transition will affect their sustainability, competitiveness, and quality of life.	GRI 203: Indirect economic impacts

Issue	Description	Corresponding GRI Standards aspect
Customer Care and Customer Satisfaction	In order to satisfy its customers, WINDTRE responds to and anticipates their needs. The company establishes a unique relationship with each customer, thus allowing it to offer personalised products and services.	GRI 203: Indirect economic impacts
Education for the future	In order to help people face the digital transition, WINDTRE promotes various types of initiatives targeting specific customers, often in partnerships with universities, schools and businesses.	GRI 203: Indirect economic impacts
Innovation and Open innovation	Innovation is the driving force behind WINDTRE, and in order to create value and better compete on the market, it increasingly requires the involvement of external subjects (start-ups, universities, laboratories), for a win-win relationship that fosters the system's overall development.	GRI 203: Indirect economic impacts
Privacy and data security	WINDTRE's proper handling of the company's data and the customers' data (especially personal data) is an essential requirement for its credibility on the market. The company therefore adopts stringent safeguards and supports numerous initiatives in this field.	GRI 418: Customer privacy
Reduction of CO ₂ emissions and smart technologies	WINDTRE's main direct environmental impact consists of the energy consumption of its network and data centres, which are responsible for almost all of the CO ₂ emissions attributable to the company. WINDTRE is committed to improving its energy efficiency and allowing its customers to do the same.	GRI 302: Energy GRI 305: Emissions
Transparency and responsible marketing	WINDTRE adopts proper business practices based on the principles of transparency, clarity, simplicity, and fairness towards customers.	GRI 417: Marketing and labelling

