

**2022**  
Sustainability report



# MUCH CLOSER

FOR A MORE  
SUSTAINABLE  
FUTURE



## Letter to the stakeholders

GRI  
2-22

2022, the year we had the honour of taking over the leadership of Wind Tre, was characterized by **great challenges and important results** for our Company. The consequences of the pandemic have hit the country hard, and the socio-economic context has been heavily affected by consequences of the conflict in Ukraine and increases in the price of materials and energy. The telecommunications market in Italy, despite **connectivity and services are increasingly needed and demand remains solid**, continued to record a contraction: in the last ten years revenues have fallen by a third, consistent with the reduction in prices: the largest decline among the large European countries<sup>1</sup>. A trend that contrasts with the exponential growth in data traffic<sup>2</sup> and the strong infrastructure investments that have been required from the sector for years.

In this scenario, we have continued on our path towards building a more sustainable and inclusive future and we have worked to **eliminate distances** in line with our purpose. Our **ESG Plan** with a 2024/2030 horizon has relaunched our effort to contribute to the development of the country through the three main axes set out by the government's recovery plan: digitalization and innovation, social inclusion and ecological transition.

In the area of **digital responsibility**, the network security of all our customers has always been the focus of our commitment as shown by huge investments in cybersecurity and new services created for the protection and privacy of users. **NeoConnessi**, our digital and media education project that accompanies families and teachers in the delicate moment in which children begin to surf the Net alone, has reached another 14,000 classes of IV° and V ° primary throughout Italy, bringing **to over 800,000** families involved.

Our commitment in promoting **well-being and inclusion** at all levels has also been continuous: 2022 saw us become the first Telco in the world certified **Equal Salary** for gender equity in its compensation processes and to be recognized **Top Employer** for the fifth consecutive year.

With our **projects on the territory**, we have worked to **bridge the social and cultural digital divide**. In 2022, 77 municipalities joined our Borghi Connessi project, designed to help small municipalities seize the opportunities of connectivity and digital. Several cities have signed a memorandum of understanding with us as part of the "Smart Partner of 100 Smart Cities" project, supported by a portfolio of services in partnership with innovative companies in the ICT world.

Finally, from an environmental point of view, we have further **reduced our CO2** emissions, gaining a 25% reduction compared to 2020 with the commitment to achieve carbon neutrality of scope 1 and 2 within 2030 and supporting projects to protect biodiversity and reforestation.

**Ours is a story of closeness**, with a network made up of **people and human connections**. A network that is nourished by the commitment to build a workplace of excellence every day and to constantly cultivate relationships with each of our stakeholders.

Our thanks go to all those who this year have contributed to addressing the main environmental and social challenges and who will continue to devote their energies to building an increasingly sustainable future.

Enjoy your reading,

**Gianluca Corti** and **Benoit Hanssen**  
Co-CEOs - Wind Tre



Gianluca Corti



Benoit Hanssen

<sup>1</sup> ASSTEL, Report on the telecommunications chain in Italy 2022

<sup>2</sup> During the two-year period of 2020-2021 alone, mobile data traffic more than doubled (+117%), and landline traffic increased by 75%. Ibidem

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**AT A  
GLANCE**



As part of the CK Hutchison Holdings Limited Group, Wind Tre is the leading company on the Italian mobile market and is one of the main alternative fixed network operators. The consumer brand is accompanied by the WINDTRE BUSINESS brand, which is dedicated to helping businesses and professionals to

face the challenges posed by the digital transformation. With the launch of the “Wind Tre LUCE&GAS” brand, the company has also entered the energy market, presenting itself as a single reference point for the simplified and transparent management of all household utilities, at the right price.

“*Here at Wind Tre we’re committed to eliminating distances between individuals, because we know that much closer we can achieve a more sustainable future. That’s why we are dedicated to enabling and strengthening the most important network of all: that of people. We invest in our TOP QUALITY telecommunication network in order to ensure speed, reliability, equal access, and a safer digital environment for everyone, including the most vulnerable. We believe in an inclusive technology that’s also capable of improving health, the environment, and quality of life. In fact, we work to reduce emissions and to accelerate the sustainable transition of cities, for which digital technologies are among the main enabling factors.*”

## MUCH CLOSER FOR A MORE SUSTAINABLE FUTURE

In order to continuously improve its social and environmental impact, Wind Tre has defined the topics for which it wants to make a difference, in collaboration with representatives of all the parties concerned. These topics, and the related activities, concern 3 key areas:

**More Responsibility; More Humanity; More Green.**

### More Responsibility

**#Business ethics and integrity**  
**#Protection of minors in the digital environment**  
**#Cybersecurity and privacy**  
**#Closer to our customers**

- Many results achieved following the introduction, for the first year, of the **ESG plan of Wind Tre**, with a horizon of 2024-2030: 10 concrete, measurable and integrated objectives in the business;
- Introduced 10 ESG KPI in the **Top Management incentive plan**;
- Guaranteed internal tools for ramping



up the **fight against corruption**: an Anti-Fraud and Anti-Corruption Policy, the Anti-Fraud and Anti-Corruption Guidelines for Suppliers, a Due Diligence procedure for business partners, and a Conflicts of Interest Policy;

- Introduced a process, in order to verify **supplier sustainability** criteria in collaboration with CRIF Group;

- A member of the **EcoVadis** network, with an ESG score that has increased for the second consecutive year, and is above the Telco average;
- Reaffirmed adhesion to the principles of the **United Nations Global Compact** for the year 2022-2023;
- Member of the **Transparency International Italia**: the Italian branch of the world's largest anti-corruption group;
- **The growth of the “NeoConnessi” project**: during the course of the 2021/2022 school year, the digital and media education project engaged with **over 14,000** fourth and fifth grade primary **classes**, assisting families and teachers as they help young people learn to use the internet responsibly on their own;
- Launched **CodyMaze**, the NeoConnessi educational game designed to teach children the theoretical foundations of computer programming and computational

thinking, with about **16,000** children and teachers connected during the virtual trip held in Pisa for **Safer Internet Day**;

- **€ 25 million** invested in data and systems security in 2022 alone, in order to guarantee maximum protection for our customers and infrastructures;
- The **Service Continuity** initiatives, aimed at verifying the resilience of our network and ensuring optimal continuity of service;
- **79% overall** customer **satisfaction**, with **83% loyalty** (DOXA surveys);
- **Artificial Intelligence** at the service of customer support, to ensure a simple and uniform experience among all the contact channels;
- **Please Don't Call**, the free service that notifies of potential unwanted calls before the customer answers.

### More Humanity

**#Digital Divide**  
**#Gender Equality**  
**#Continuous digital learning**  
**#Inclusion of people with disabilities**  
**#Closer to our communities**  
**#Closer to our people**



- Increase in **mobile network coverage** and eliminate FTTH (Fiber To The Home) gaps with FWA (Fixed Wireless Access);
- **77 municipalities**, for a total of about 267,000 citizens, joined the **Borghi Connessi** project in 2022;
- Developed the **NeoConnessi Silver** project: a platform and a Facebook Group designed to help seniors become more familiar with technology, to create a community, and to share experiences;
- 6,000 students, 1,700 classes, 10,490 connected devices in 786 different cities and for the virtual tour of Naples and Procida for **Grandparents Day**;
- 590K views on the YouTube campaign dedicated to people over 60, with **video tutorials** to help them approach digital technologies;
- First Telco company in Italy to have introduced the **Wi-Fi Calling** service;
- The world's first telecommunications company to receive **Equal Salary certification**,

which has once again been reaffirmed for the current year;

- Internally launched **GENERATIONS 4 INCLUSION**, first initiative dedicated entirely to intergenerational teamwork on of Diversity and Inclusion issues;
- Announcement of the opening of the first **Anti-Violence Centre** at the Gemelli Polyclinic of Rome, in partnership with the Assolei Association;
- Focus on skills: **over 385,000 training hours** in total to Wind Tre people;
- Entry into the corporate structure of the **POLIMI Graduate School of Management**;
- More than doubled the digital accessibility**

**lity for people with disabilities** on digital touchpoints;

- Created webinars on **affective orientation** and **gender identity**, in partnership with PARKS Liberi e Uguali, for all Wind Tre people;
- 80 social and humanitarian initiatives** supported in 2022, with a total of about € 3 million collected;
- The **Sustainability Newsletter**, created to disseminate the culture of sustainability throughout the company, and sent to all employees on a bimonthly basis;
- Recognition by **Top Employer Italia** for the fifth consecutive year, in addition to recognition as one of **Italy's Best Employers** and as a **Diversity Leader in Europe**.

## More Green

#Decarbonisation

#Smart technologies for the environment



- CO<sub>2</sub> emissions reduced by 25% with respect to 2020 and by 40% with respect to 2017**, with the commitment to eliminate the entirely by 2030;
- Initiatives to **improve the sustainability of the working environment**, from lighting systems with automatic on and off functions, to smart office sharing, the use of recycled paper and recyclable toner, and the installation of drinking water dispensers to eliminate the use of plastic bottles;
- The promotion of **sustainable mobility** with the **corporate car sharing** service, and a company car fleet made up of **180 hybrid or electric cars and 28 charging stations**;
- Activities aimed at making the **shops more sustainable**: LED lighting, air quality monitoring platform, reduction of paper consumption, and new eco-sustainable uniforms;
- Supported the creation of a **second urban forest** in the city of Treviso, with about 2,000 trees planted, in partnership with Arboria;
- Enhanced the **integrated management system** with **two new certifications**: **Energy Management** (ISO 50001) and **Emissions Reduction** (ISO 14064-1);
- 7 cities** reached by the **"Smart City"** project, which is aimed at supporting the digital and sustainable transformation of Italian cities;
- Energy Supervisor**: our ICT solution for the digital management of energy consumption and expenditures by companies and the Public Administration;
- A Corporate Partner of the **Homes of Emerging Technologies (HETs) in Rome, L'Aquila and Cagliari**: living labs for companies, start-ups, and institutions, offering

them the possibility of experimenting with innovative 5G-integrated services for solutions useful for citizens and businesses;

- Supported the **WWF** with the recovery of the **WWF Oasis** nearest to headquarters, achievement celebrated with an **illustrated volume** related to biodiversity themes and enriched with a story by Federico Moccia, and drawings by the Wind Tre little friends;

- Wind Tre and WWF, together for the Mediterranean**: working with the WWF and our customers to protect the landscapes and species of the Mediterranean Sea;

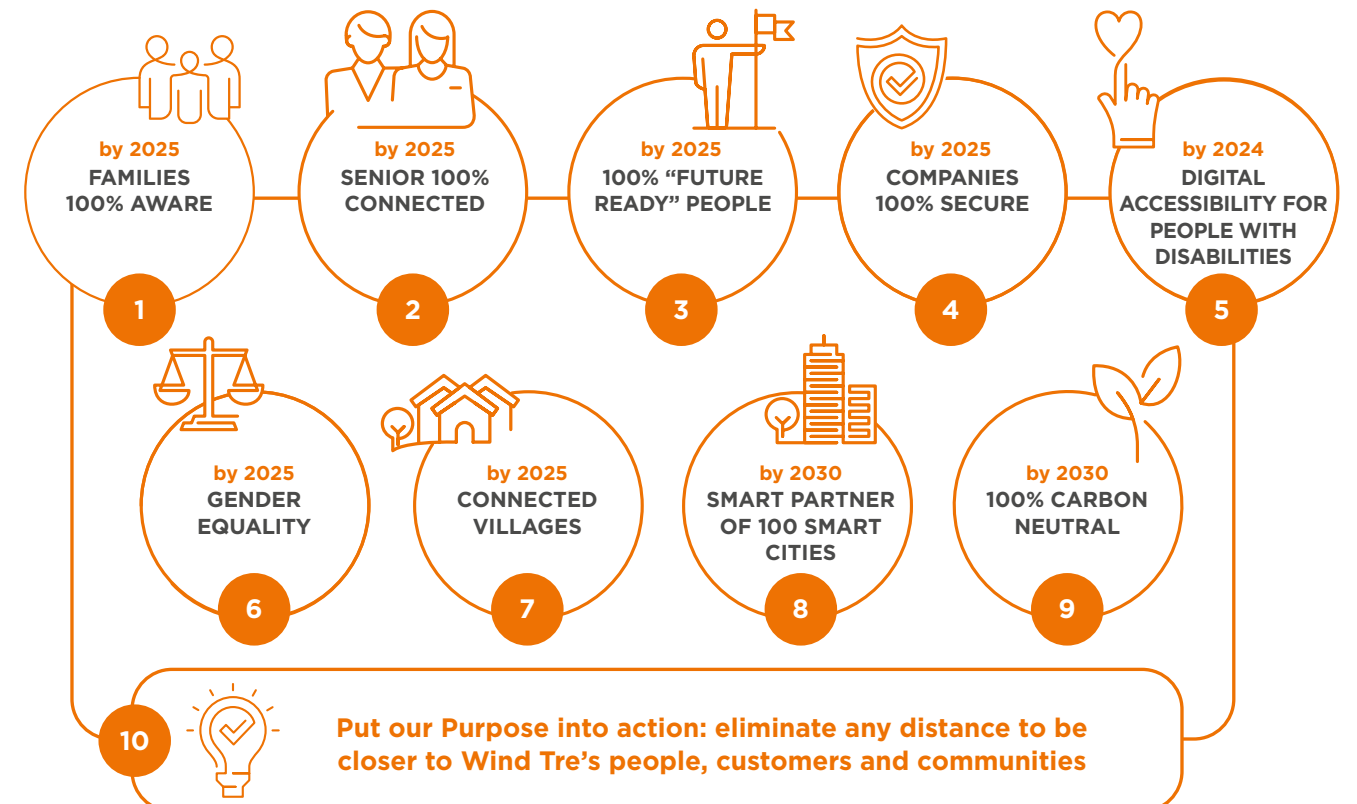
- The extension of the products' life cycle through **repair and reuse options offered to consumers and business customers**;

- Introduction of new **digital business cards**, which can be used directly via smartphone, available to all Wind Tre people.

## THE 2030 ESG PLAN

Wind Tre's long-term ESG (Environmental, Social and Governance) plan, is composed of 10 ambitious goals, in line with the United Nations 2030 Agenda. It is a concrete and measurable programme that was created in collaboration with all the company areas, and is consistent with the business activities.

In order to continuously improve its social and environmental impact, Wind Tre has laid out the topics for which it wants to make a difference, in collaboration with representatives of all the parties concerned. These topics, and the relative activities, regard 3 key areas: More Responsibility, More Humanity, More Green.







**THE COMPANY**





# ABOUT WIND TRE

GRI 2-6



## NUMBERS

Wind Tre mobile network covers 99.7% of the population in 4G, and 95.9% in 5G

Wind Tre is the number one mobile operator in Italy<sup>3</sup> and one of the leading alternative fixed network operators. The company is part of the multinational group CK Hutchison Holdings Limited.

The new Wind Tre mobile network covers 99.7% of the population in 4G, and 95.9% in 5G<sup>4</sup>, with state-of-the-art infrastructure. The company is also committed to expanding fibre optic-based ultra-broadband connectivity services and FWA throughout the country.

The WINDTRE consumer brand consolidates the company's value positioning, which is centred around convenient and inclusive technology. In fact, having always been 'much closer' to its customers in their daily lives, WINDTRE aims to facilitate the interpersonal connections, and to help people face the challenges of today. These values are also highlighted by its communication strategy, which

is focused on closeness and the stated 'company purpose' of eliminating any distance. The brand for the consumer market is accompanied by the WINDTRE BUSINESS brand, which is dedicated to helping businesses and professionals face the challenges posed by the digital transformation. In fact, the WINDTRE BUSINESS brand offers innovative products and services with a wide range of integrated fixed and mobile telephony solutions, ultra-broadband, fibre optic, and FWA connectivity services, and Data Analytics, Cybersecurity, and Cloud solutions with the next generation Data Centres, all in partnership with numerous industry-leading ICT Solution and Application Providers. With the launch of the "Wind Tre LUCE&GAS" brand, the company has also entered the energy market, offering itself as a single reference point for the simplified and transparent management of all household utilities, at the right price.

<sup>3</sup> Communications Observatory, AGCom, 28 December 2022

<sup>4</sup> In order to get 5G browsing speeds, the user must have a 5G service plan with a device enabled for the Wind Tre network, and must be within a Wind Tre 5G coverage area. 5G service only valid in Italy. For info and coverage, see [windtre.it/5g](https://windtre.it/5g)



## Part of the CK Hutchison Group

CK Hutchison Holdings Limited is a multinational group that has always been committed to innovation and technology. The group operates in four core business areas: Ports and related services; Retail; Infrastructure; and Telecommunications. It has a presence in over **50 countries** worldwide. In the **Telco** division, which also includes Wind Tre, CK Hutchison is the global leader in converged telecommunications services, and a pioneer in mobile broadband technologies. In Europe, it has a presence in six countries: Italy, the United Kingdom, Sweden, Denmark, Austria, and Ireland.

The Sustainability Framework is centred around four pillars (Environment, Society, Governance and Innovation of the Sustainable Business Model), and nine major long-term goals, which are pursued based on business activities and geographical area.

The group companies operating in the **telecommunications field**, including Wind Tre, are governed by CK Hutchison Group Telecom Holdings Limited (**CKHGT**).

For the markets and communities in which it operates, CKHGT has established its role as one of building a **sustainable, thriving, and inclusive digital society**.

## THE CK Hutchison Sustainability Framework

Given the size of the Group and the extent and complexity of its operations, CKHH faces numerous sustainability challenges, which it evaluates and prioritises through continuous stakeholder engagement.

The Group has established a well-structured governance model for sustainability management, complete with a Sustainability Committee at the level of the Board of Directors, and sustainability policies that include a Sustainability Policy, an Environmental Policy, a Health and Safety Policy, a Human Rights Policy, a Policy on Modern Slavery, and a Supplier Code of Conduct ([https://www.ckh.com.hk/en/esg/esg\\_policies.php](https://www.ckh.com.hk/en/esg/esg_policies.php)).

Among other things, CKHGT group's sustainability governance structure includes a **Sustainability Forum** and a **Sustainability Network** and Climate Action working group, both of which meet on a monthly basis and are attended by all the group companies' members.

In keeping with the CK Hutchison sustainability framework, CKHGT also established its own **sustainability strategy** in 2022. This strategy, which is also aligned with the Wind Tre sustainability model presented below, has five objectives:

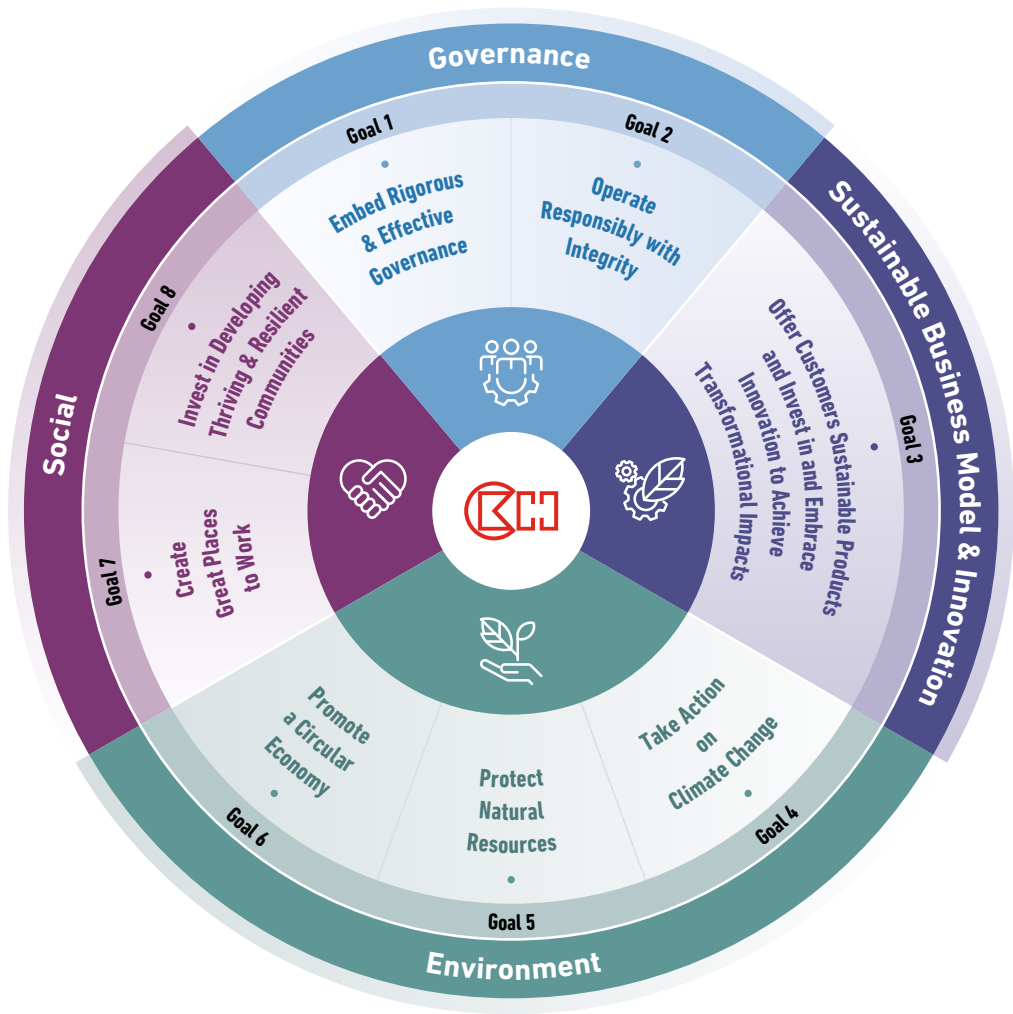
- **To create a thriving digital economy;**
- **To take action against climate change;**
- **To promote a circular economy;**
- **To create ideal workplaces;**
- **To operate with responsibility and integrity.**

CK Hutchison Group is committed to the initiatives and principles of corporate responsibility promoted by the **United Nations Global Compact** in the fields of human rights, labour, the environment, and the fight against corruption.

As an affirmation of the company's commitment to achieving a more sustainable future, **Wind Tre also supports the Global Compact**.







The corporate structure

GRI 2-1 GRI 2-2 GRI 2-9 GRI 2-10

Wind Tre S.p.A is a single shareholder joint stock company subject to the management and coordination of CK Hutchison Group Telecom Italy Investments S.à r.l, a limited liability company based in Luxembourg. Wind Tre is part of CK Hutchison Holding Limited (CKHH) Group, a multinational holding company based in Hong Kong, currently one of the largest companies listed on the Hong Kong Stock Exchange, and a leader in the mobile communications and data services sector in various countries, whose group business is mainly centred around innovation and technology. Wind Tre is not listed on the stock exchange. Wind Tre S.p.A.'s registered offices are located at no. 5 Largo Metropolitana, Rho (Milan) Italy, and serve as the administrative, financial, and technological hub for the company itself, as well as for the Italian group to which it belongs, which includes the sole shareholder company Wind Tre Italia S.p.A., and the wholly owned subsidiaries Wind Tre Retail s.r.l., 3Lettronica Industriale S.p.A., CKHH MSK 22 s.r.l., and Zefiro NET s.r.l.

The company also has a location on Via Cesare Giulio Viola, in Rome, where its legal, commercial, regulatory, and institutional activities are carried out.

Unless otherwise specified, in the remainder of this document the term Wind Tre (or the Company) is to be understood as the group to which Wind Tre Italia S.p.A., Wind Tre S.p.A., and all its subsidiaries belong. The Group has other secondary location distributed throughout Italy, which allow the company to maintain a stable presence nationwide. Wind Tre is an Italian leader in the fixed and mobile telecommunications sector, with a strong focus on mobile data communications, mobile Internet access services, fixed broadband and ultra-broadband telephony services, and convergent fixed-mobile solutions. It therefore has a widespread presence throughout the country. Wind Tre has adopted a traditional administration and control model, in which the Board of Directors plays a fundamental role as the senior body responsible for managing the Company in the interests of the shareholders. The group's governance structure is comprised of the boards of directors and the control bodies of each individual company, with Wind Tre SpA playing an internal coordination role at the group level.

Pursuant to each Group company's Articles of Association, the Board of Directors may consist of a variable number of members, who re-



**ADMINISTRATION AND CONTROL MODEL**  
The Board of Directors plays a fundamental role as the senior body responsible for managing the Company

Governance	Sustainable Business Model & Innovation	Environment	Social
Material Topics			
<ul style="list-style-type: none"><li>• Integrated Governance Structure</li><li>• Internal Control Framework</li><li>• Data Privacy and Cyber Security</li><li>• Labour and Human Rights</li><li>• Supply Chain Responsibility</li><li>• Sustainable Investing</li></ul>	<ul style="list-style-type: none"><li>• Service Excellence</li><li>• Climate Resilient Business</li><li>• Social Inclusion</li><li>• Sustainable Product Choices</li></ul>	<ul style="list-style-type: none"><li>• Decarbonisation</li><li>• Biodiversity Protection</li><li>• Water Management</li><li>• Air Quality</li><li>• Circular Economy</li></ul>	<ul style="list-style-type: none"><li>• Talent Attraction</li><li>• Employee Engagement</li><li>• Learning and Development</li><li>• Health, Safety, and Wellbeing</li><li>• Inclusion and Diversity</li><li>• Community Investment</li></ul>
Mapping to the SDGs			
<div><div>8</div>DECENT WORK AND ECONOMIC GROWTH</div> <div><div>16</div>PEACE, JUSTICE AND STRONG INSTITUTIONS</div>	<div><div>7</div>AFFORDABLE AND CLEAN ENERGY</div> <div><div>9</div>INDUSTRY, INNOVATION AND INFRASTRUCTURE</div> <div><div>11</div>SUSTAINABLE CITIES AND COMMUNITIES</div> <div><div>12</div>RESPONSIBLE CONSUMPTION AND PRODUCTION</div> <div><div>13</div>CLIMATE ACTION</div> <div><div>14</div>LIFE BELOW WATER</div> <div><div>15</div>LIFE ON LAND</div>	<div><div>2</div>ZERO HUNGER</div> <div><div>6</div>CLEAN WATER AND SANITATION</div> <div><div>7</div>AFFORDABLE AND CLEAN ENERGY</div> <div><div>12</div>RESPONSIBLE CONSUMPTION AND PRODUCTION</div> <div><div>13</div>CLIMATE ACTION</div> <div><div>14</div>LIFE BELOW WATER</div> <div><div>15</div>LIFE ON LAND</div>	<div><div>3</div>GOOD HEALTH AND WELL-BEING</div> <div><div>4</div>QUALITY EDUCATION</div> <div><div>5</div>GENDER EQUALITY</div> <div><div>8</div>DECENT WORK AND ECONOMIC GROWTH</div> <div><div>10</div>REDUCED INEQUALITIES</div>

Wind Tre subsidiaries and affiliates as at 31.12.2022	Company/Consortia registered offices	Percentage of share capital/consortium fund held by Wind Tre
3Lettronica Industriale S.p.A.	Italy	100%
Wind Tre Retail S.r.l.	Italy	100%
CKHH MSK 22 S.r.l.	Italy	100%
Zefiro NET S.r.l.	Italy	100%
Mix S.r.l.	Italy	9.97%
Janna S.c.ar.l.	Italy	17%
MIP Politecnico di Milano	Italy	2.82%
Campania Digital Innovation Hub Rete Confindustria Scarl	Italy	10%
Consel Consorzio ELIS a r.l.	Italy	1%

main in office for a period not exceeding three financial years, and can be re-elected. The Shareholders' Meeting determines the number of members on the Boards of Directors, and appoints the Directors themselves, who do not receive any remuneration for positions they hold. The Board of Directors is vested with all the broadest powers of ordinary and extraordinary administration, with the exception of those reserved exclusively for the Shareholders' Meeting by law and by the Articles of Association.

The Board of Directors for the Group Companies has not established Executive Committees pursuant to art. 2381 of the Italian Civil Code. The Wind Tre SpA Board of Directors has been in office since 31 March 2022, and consists of seven directors: six male and one female.

The Chairman of the Board of Directors is vested with the powers provided by law and Wind Tre's articles of Association with regard to the authority to represent the company and the functioning of its governing bodies. There are two Co-Chief Executive Officers, both of whom are Executive Directors on the Board of Directors.

The names of the members of the Wind Tre S.p.A. Board of Directors appointed by the Shareholders' Meeting on 31 March 2022 are listed below: Fok Kin Ning Canning (Chairman of the Board of Directors), who does not hold an executive role in the company, Gianluca Corti (Co-CEO), Benoit Jacques Joseph Hanssen (Co-CEO), Frank John SIXT (Director), Stefano Invernizzi (Adviser), Edith Shih (Director), Christian Nicolas Roger Salbaing (Director).

In addition to the co-CEOs with equivalent powers, Gianluca Corti and Benoit Hanssen, the members of the Board of Directors also include the company's Chief Financial Officer, Stefano Invernizzi. In addition to holding executive roles relating to their positions, the indicated managers also have the same roles in each of the subsidiaries, except in the case of Wind Tre Retail, where Gianluca Corti is Chairman of the Board of Directors and Benoit Hanssen is Chief Executive Officer; they do not have other positions outside the Company.

The members of the Board of Directors are selected, with the approval of the ultimate shareholder CK Hutchison Holdings Ltd, based on the policies of the Parent Company ([https://www.ckh.com.hk/upload/assets/downloads/en/CG\\_Board\\_Diversity\\_Policy\\_e\\_20201126.pdf](https://www.ckh.com.hk/upload/assets/downloads/en/CG_Board_Diversity_Policy_e_20201126.pdf)), in compliance with the legal prerequisites of integrity, professionalism, and independence

established by article 2387 of the Italian Civil Code, as the rules to which the assumption of the office of director is subject, as well as the Group's Corporate Governance rules (see: [https://www.ckh.com.hk/en/about/cg\\_policies.php](https://www.ckh.com.hk/en/about/cg_policies.php)).

The proper fulfilment of the responsibilities necessary for the Company's management and administration requires Board members with adequate professionalism, who have high levels of expertise, diversified and appropriately distributed among the members of the management body, such as to ensure efficient administration, with the primary aim of protecting the interests of Wind Tre and the Group as a whole.

In this sense, Wind Tre remains constantly committed to maintaining high standards of corporate governance suitable for the needs and interests of the Company and its subsidiaries, in line with the high standards set by the parent company CKHH to ensure effective corporate governance practices, which are considered essential for increasing the value for the shareholders, and for safeguarding the interests of the same, as well as other stakeholders.

In full accordance with the current legal provisions and the Corporate Governance policies of the group to which it belongs, the Company has adopted solid corporate governance principles, which emphasise a high quality Board of Directors and effective internal controls, both based on a corporate culture of ethics and responsibility. Each Group Company also has a Board of Statutory Auditors, which serves as the internal control body for the management, and consists of 3 standing auditors and 2 alternates: 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.

A Management Team was set up to support this governance structure, which consists of the following figures: Co-CEOs Gianluca Corti and Benoit Hanssen, Director of External Affairs & Sustainability Roberto Basso, Director of Human Resources Rossella Gangi, Chief Financial Officer Stefano Invernizzi, Director of Technology Carlo Melis, Director of Customer Experience & Data Analytics Mirko Rugarli, Commercial Director Enzo Maurizio Sedita, and Director of Legal & Regulatory Affairs Mark Alexander Shalaby. The Wind Tre S.p.A Management Team is the point of reference for ESG matters at the Group level.

Identity and values



PURPOSE

*We exist to eliminate any distance between people*



VISION

*We want to be the telco company that people choose to ensure a better life and future for all*

The citizenship model

Throughout the pandemic, our way of operating has changed profoundly, and this new normal **has led Wind Tre to offer a greater degree of flexibility and freedom, as well as empowerment and trust**. All this has entailed a considerable cultural change, with the support of new skills and forms of professional conduct.

That's why in 2021 Wind Tre established **a new Citizenship Model**, which is meant to **encourage appropriate conduct on the part of everyone who works for the Company**, and guides the day-to-day activities of the people-oriented processes, including talent acquisition, performance management, development, and training.

An evolutionary and impactful model that's simple and concrete, is designed for everyone, and is based on Purpose and Values, **broken down into eight Behaviours that can have concrete and measurable impacts** both inside and outside the company.

Our values



TRUST means believing in people

It means being transparent, loyal and open in your relationship with others, both in good times and bad. It is the glue that keeps people together, and an essential tool for empowerment and transversal collaboration within an organisation, something we build and renew every day in our behaviour and decisions.



RESPONSIBILITY means setting an example, showing commitment and respect

It means accepting and keeping promises, focusing on the present without losing sight of the impact on the future. It means responsibility towards everyone: our company, our people, our clients and the environment in which we live.



INCLUSION means openness, listening, and understanding everyone's needs

We show it by welcoming all points of view and valuing diversity, aware that this will help us achieve better results. Our goal is to ensure equal opportunities, removing all barriers and forms of discrimination by gender, race, age, religion, disability, status and digital knowledge.



COURAGE means facing fearlessly tackling challenges with a positive attitude

It means carrying out work with passion and determination, knowing that the quest for excellence is the only way to continuous improvement. Only by taking risks and leaving your comfort zone, can you innovate and make a difference, while always respecting objectives, processes and customers.



BOARD OF STATUTORY AUDITORS

The internal control body for the management of the company



# A Top Quality Network, a Network of People

We believe in the most important network of all: that of people.

The company is firmly convinced that a more sustainable future can only be achieved through common effort. Wind Tre is aware of the importance of having a network of individuals, and is committed to cultivating and improving relations with each of the stakeholders with whom it interacts through its various initiatives and projects.



## Top Quality Network

Together with its network of people, **Wind Tre's Top Quality network is an extraordinary enabler for accelerating and driving efforts with regard to the digital transition and inclusion.**

The Wind Tre mobile network is a modern infrastructure, consisting of 20,000 plants, which are capable of offering 2G, 3G, 4G, 5G and NBIoT (Narrowband Internet of Things) services all throughout Italy.

Sustained by an **investment of over € 6 billion**, the network has undergone considerable technological upgrading since 2017, with the aim of meeting the increasing demand for connectivity on the part of customers.

Wind Tre's outdoor mobile network coverage level is close to **100% in terms of population reached**, with 99.9% for 2G (GSM), 99.6% for 3G (UMTS/HSPA), 99.7% for 4G (LTE), and 95.9% for 5G, respectively<sup>7</sup>.

With regard to the fixed network, Wind Tre is continuously investing in fibre optics, activating ultra-broadband services and technologies (FTTH-FTTC) thanks to agreements stipulated with wholesale partners. Thanks to the company's partnership with Open Fiber which is responsible for providing the fibre optic connections, the FTTH coverage has been expanded, with 236 municipalities reached<sup>8</sup> as of December 2022.

A major focus has been placed upon the development of 5G technology, which will be a fundamental factor in the digitisation of the economy and society. This technology will not only provide for increased transmission speeds, but will also result in the digital transformation of numerous aspects of daily life and activities.

At the end of 2022, Wind Tre participated in the Extended Partnership on the 'Telecommunications of the Future' and was awarded the PNRR tender (PNRR-MUR-M4C2). The project, called RESTART (RESearch and innovation on future Telecommunications systems and networks, to make Italy more smART), has among its objectives the development of technological solutions capable of reducing energy consumption and achieving a better gender balance in telecommunications.

Further experiments were carried out for the integration of 5G, **Edge-Computing, Artificial Intelligence, and IoT technologies**. New solutions have been tested to guarantee Smart City, automotive, advanced smart-grid, and green economy services.

In fact, this is the focus of several of the **projects funded within the context of the Horizon 2020 and Horizon Europe** research and innovation programmes, which have rendered a budget of over € 95 billion available to fund research projects or other scientific and technological innovation activities. In this context, the initiatives to which Wind Tre participates are all focused on 5G technology.

- **5GMeta**: an open-source platform that collects the enormous amount of real time information generated by cars and drivers in order to develop innovative products and services;
- **5G-Induce**: the development project for an open-source 5G platform in which each developer can create and distribute customised applications with zero dependency on cloud service suppliers, and can offer Industry 4.0 solutions for the creation of production control automations;
- **SMART5GRID**: the experimental open-source 5G structure responsible for studying the possible synergies between 5G and the energy distribution network, to increase the quality of supply, improve the speed of network fault repairs, and promote service continuity;
- **NEMO**: creation of 5G living labs to guarantee IoT services for various sectors (agriculture, energy, mobility, industry 4.0, and media), while at the same time contributing to the reduction of energy consumption, pesticide use, and CO<sub>2</sub> emissions.



**5G**  
Many initiatives conducted from Wind Tre for the development of 5G technology



  
**TOTAL POPULATION COVERAGE**  
reached by Wind Tre network

  
**TOP QUALITY NETWORK**

With regard to the **MOBILE network**, Wind Tre's covers over 99% of the Italian population with 5G technology (see below), with a cutting-edge infrastructure and excellent performance even when many users are browsing at the same time and in the most congested places. From this point of view in 2022 the Group has maintained its leadership for the first half of 2022 as the **"Fastest mobile network in Italy"** according to Ookla (source: Crowd Data)<sup>5</sup>.

With regard to the **FIXED Network**, in 2022 the Group was recognised by nPerf<sup>6</sup> as the Network with the **fastest Download speeds** and the best average response times (lowest latency). (survey carried out from 1 June 2021 to 1 June 2022).

<sup>5</sup> Data collected passively from the smartphones of customers who have downloaded the Ookla speed test app (anonymous aggregation)  
<sup>6</sup> A company that allows users to perform internet connection speed and latency tests via a web application for smartphones, tablets, and personal computers  
<sup>7</sup> 5G service valid only in Italy. To navigate in 5G you need to have an enabled offer and a 5G device and be in the areas covered by WINDTRE's 5G  
<sup>8</sup> Total municipalities reached from 2017 to 2022; the growth between 2021 and 2022 is equal to 21 municipalities (from 215 to 236)



Awards and acknowledgements received in 2022



For the fifth consecutive year, Wind Tre has been included in the **Top Employer Italia** ranking, which is reserved for companies that excel in the field of Human Resource management and development. 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.



Wind Tre is the first TELCO company in the world to receive **Equal Salary** certification, conferred by EQUAL-SALARY Foundation. This attestation certifies pay equity between women and men, and confirms Wind Tre’s implementation of solid Diversity, Equity, and Inclusion policies.



Wind Tre was included in the **2022 Italy’s Best Employer** ranking. The nationwide survey, which is conducted by Statista in collaboration with Corriere della Sera, is carried out through social listening, and recognises the top 400 Italian companies considered to be the very best by their own employees.



Wind Tre has been recognised as a **2023 Diversity Leader in Europe** by Statista and the Financial Times thanks to its ability to promote diversity and to include minorities in its business practice.



Wind Tre received the **2022 CEOFORLIFE-ECI UNITED ARAB EMIRATES & GLOBAL AWARD** for setting new standards of excellence in sustainability projects, namely for the extraordinary social value of the NeoConnessi project.



Wind Tre received the **CEOforLIFE** award, which is given to CEOs who have set new standards of excellence through initiatives aimed at ensuring a better and more sustainable future. In particular, the company’s outstanding commitment to the promotion of gender equality was recognised.



According to the study **“Best in Italy - Service Champions 2023”** conducted by the German Institute of Quality and Finance, for the seventh consecutive year Wind Tre ranked first among telephone service providers for the excellent customer support services offered at its points of sale. The company was also awarded the ‘Top Service’ award in the Fibre and ADSL Internet categories.

Furthermore, Wind Tre is among the top 522 companies for outstanding customer relations. According to a study conducted by Statista for **Economia del Corriere della Sera**, the company was among the top landline telephony and internet providers.

Lastly, Wind Tre’s ‘Voce alle Gamer’ project won several awards at the **NC and Brand Content & Entertainment Awards**, including Special Mention for ‘Inclusion’, and the **Grand Prize at the Brand Purpose Awards** for the way it has tackled the issue of gender discrimination in the gaming sector.





## MUCH CLOSER FOR A MORE SUSTAINABLE FUTURE

### Wind Tre and the goals of the global agenda

The ICT sector can make an extremely important contribution to the achievement of the goals of the 2030 Global Agenda, as it represents an extraordinary driver of social, cultural, environmental, and economic innovation, while at the same time supporting connections between individuals, territorial digitisation, and business development. Thanks to our continuous dialogue with our stakeholders, an approach to ESG issues has been structured that's aimed at maximising the positive impact of the Company on society and the environment, while at the same time actively contributing to the achievement of the 2030 Agenda's Goals.

Wind Tre wants to accompany all citizens in the transition to a digital and interconnected

society, guaranteeing maximum prevention and protection against the multitude of risks that this can entail, especially for the most vulnerable, and creating a safer digital environment for all.

The Company is committed to give help to people to be prepared for the future by supporting the dissemination of the necessary skills, guaranteeing equal access to the Internet, and promoting digital technology as a tool for inclusion. It intends also to actively contribute to protecting the planet and improving people's quality of life by enabling a fair and environmentally sustainable transition through its technologies.



### THE 2030 UN AGENDA

The 17 Sustainable Development Goals, which were introduced by the United Nations General Assembly in September of 2015 within the context of the 2030 Agenda, consist of 169 targets, and constitute a universal action plan for “**people, planet and prosperity**”. They are essentially characterised by the fact that they are universal, interconnected, and indivisible: they must take specific territorial realities into account, and are potentially applicable everywhere, at the global, national, regional, local and urban levels. They include numerous references to the well-being of individuals, and to the equitable distribution of the benefits of intra-generational and intergenerational development. One of the key principles is No one gets left behind.

## MODEL AND VALUES

Wind Tre exists to eliminate the distances between people. Starting with this “purpose” and the two relative enabling factors (a top quality network and a network of people), the company has laid out three key areas in which to ensure its commitment to the **development of a more sustainable future**:

**More Responsibility:** Wind Tre believes that companies should no longer limit themselves to playing by the rules, but should pro-actively work for the socio-economic development of the communities in which they operate and the protection of their customers. That's why it has adopted a governance model aimed at guaranteeing maximum fairness for customers and partners alike, and introducing sustainability priorities into its business activities. The company is committed to ensuring maximum online security for all, by protecting the sensitive data and the privacy of all its customers, and by protecting the most vulnerable groups, such as the young and the elderly, against potential online threats.

**More Humanity:** Wind Tre believes that, if used correctly, digital technologies are a means of reducing distances and guaranteeing greater inclu-

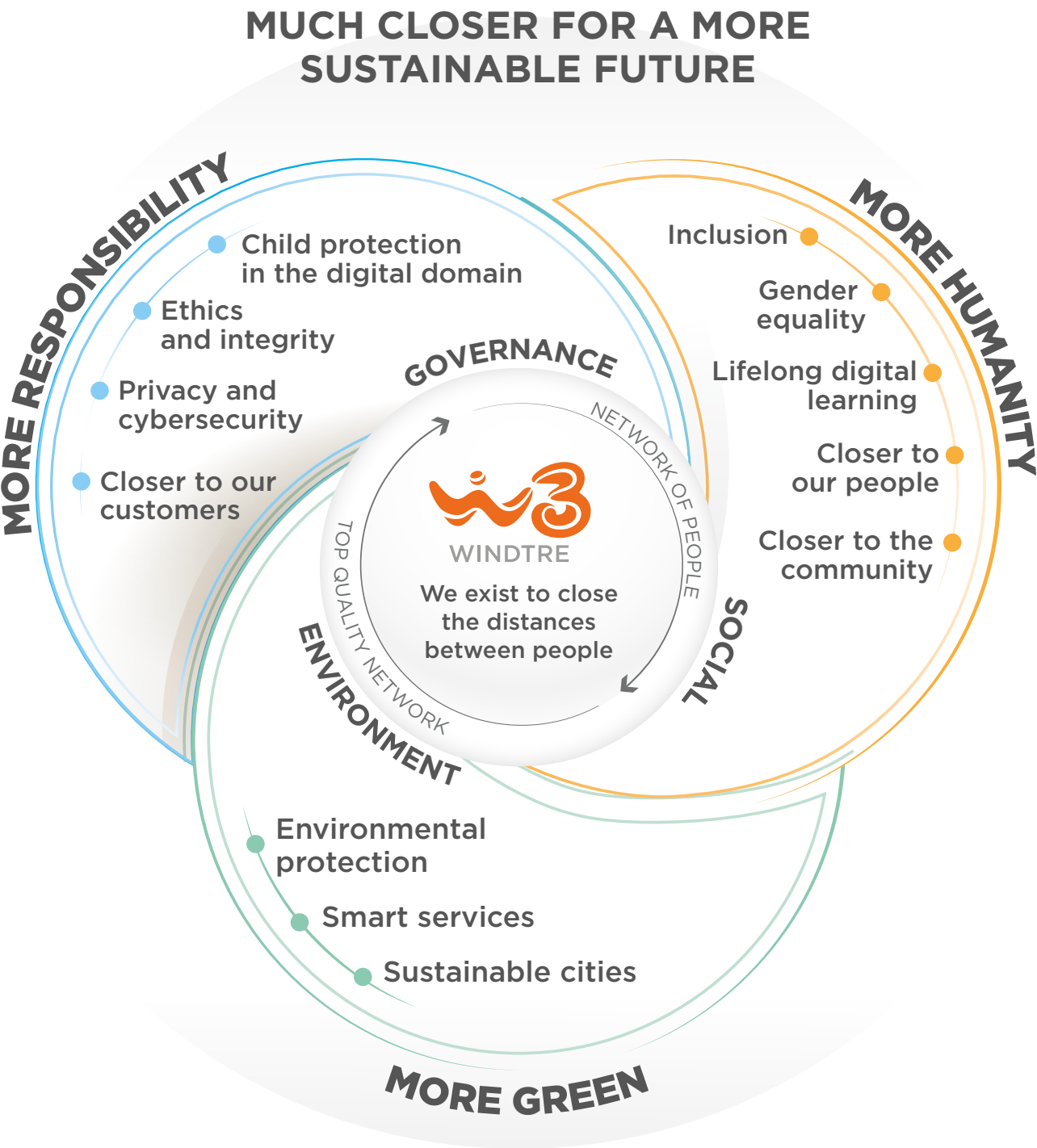
sion through access to the network, regardless of race, gender, age, disabilities or social status. For Wind Tre, it is essential to reduce and ultimately overcome the digital divide, and for this reason the company is committed to developing a network that is accessible and affordable, above all for its own customers and marginalised communities, thus improving equal access and promoting equal opportunities for all. Inclusion also means access to adequate skills, which is why Wind Tre is committed to continuously providing learning opportunities designed to prepare people for the challenges posed by digitisation.

**More Green:** Wind Tre believes that the current policies implemented by the EU Member States are not yet sufficient to halt climate change, and believes that everyone, above all companies, must do their part to tackle this challenge. Wind Tre is committed to making its activities as environmentally sustainable as possible, first and foremost by reducing its emissions and streamlining its use of resources. Wind Tre supports the Twin Transition, which has been enabled by investments in 5G and digital technologies, and is necessary in order to render our cities and communities more sustainable.



### KEY AREAS

Three areas in which Wind Tre guarantees its commitment: More Responsibility, More Humanity and More Green



STAKEHOLDERS AND RELEVANT TOPICS

GRI 2-25 GRI 2-29 GRI 3-1 GRI 3-2 GRI 3-3

Wind Tre maintains regular dialogue and discussions with its stakeholders, with whom, over time, the company has built solid relationships based on trust and collaboration. Wind Tre’s relations with the people and organisations directly or indirectly involved in its business activities (so-called “stakeholders”) are a determining factor for its continuous improvement, and for the implementation of projects of common interest, and are therefore considered to be of great value.

Contacts take place in different ways, depending on the categories involved, and are repeated several times during the course of each

financial year. Most of the discussion and dialogue activities are attributable to the usual collaboration practices, and are unrelated to the reporting activities; some initiatives, on the other hand, are organised specifically in view of the drafting of the Sustainability and Integrated Management System Reports.

The following table shows the initiatives undertaken with the various stakeholders in 2022, 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.



STAKEHOLDERS

The stakeholders represent a determining factor for continuous improvement

Stakeholder	Topics of greatest interest	Main initiatives
<b>Shareholders and bondholders</b> • CK Hutchison Ltd and its Management	Economic results	Shareholder meetings
	Corporate governance	Periodic calls and meetings Governance, Risk Management and Compliance System (eGRC)
	Market trends	Ad hoc meetings at conferences organised by banks or other institutions
	Market trends	Periodic calls and meetings Group ESG data collection
<b>Customers, PA and Consumer Associations</b> • Consumers, MicroBusiness Customers, and SMEs • Business Customers (Top & Large) • Public Administration • Consumer Associations	Customer satisfaction	Customer satisfaction surveys
	Transparency and responsible marketing	Iniziativa di digital responsibility
		Servizio clienti e carta dei servizi
		Iniziative di dialogo con le Associazioni consumatori
	Privacy and data security	Dialogue with the data protection authorities and oversight of data controllers
		Governance, Risk Management and Compliance System (eGRC)
	Network reliability and coverage	Participation in the NRRP - RESTART project Participation in coverage analyses
	Safety of young people on the Internet	The “NeoConnessi” project
	Digital inclusion	The “Borghi Connessi” project
		The “NeoConnessi” project
	Technological innovation for the new generations	Partnerships with Universities and technology dissemination organisations, Homes of Emerging Technologies, participation in conferences



Stakeholder	Topics of greatest interest	Main initiatives
<b>The Public</b> <ul style="list-style-type: none"><li>• Territorial and local communities</li><li>• Tertiary Sector (non-profits, NGOs, etc.)</li><li>• Universities and Research Institutes</li><li>• Media and opinion leaders</li></ul>	Digital Accessibility	Disability Hub  Specific interventions on digital touchpoints and on the main websites  Expansion of the portfolio of offers with solutions dedicated to people with disabilities
	Privacy and data security	Governance, Risk Management and Compliance System (eGRC)
	Innovation	Partnerships with Universities and technology dissemination organisations, Homes of Emerging Technologies, participation in conferences
	Support for solidarity initiatives	Insieme si può (Together we can); Charity fund raisers; Other charity initiatives (e.g. Charity Hub)
	Local investments	The “Borghi Connessi” project
		The “Smart partner for 100 smart cities” project
		Partnerships with Universities and technology dissemination organisations, Homes of Emerging Technologies
	Transparency	Sharing of data and information on all the corporate touchpoints, publication of the sustainability report
<b>Environmental ecosystem</b> <ul style="list-style-type: none"><li>• Ecosystem</li><li>• Ministry of the Environment</li><li>• Environmental Associations</li><li>• Specialised agencies (e.g. ARPA, APAT)</li></ul>	Reduction of CO <sub>2</sub> emissions	Zero emissions to 2030 goal  Company car fleet update  Planting and biodiversity protection initiatives  Partnership with WWF Italy on energy and emissions
		Energy savings
		Energy efficiency projects
		Consumption of clean and renewable energy
<b>Financial community</b> <ul style="list-style-type: none"><li>• Banks</li><li>• Institutional investors</li><li>• Private investors</li><li>• Financial analysts</li><li>• Rating agencies</li></ul>	Economic results and their sustainability	Periodic conference calls organised by the shareholder
	Legal compliance	
	Corporate governance	
	Transparency	Ad hoc meetings at conferences organised by banks or other institutions
	Market trends	
	Corporate strategy	
<b>Suppliers and commercial partners</b> <ul style="list-style-type: none"><li>• Suppliers of goods and products</li><li>• Suppliers of services</li><li>• Sub-suppliers of goods and products</li><li>• Direct and indirect sales network</li></ul>	Sustainable Procurement	Verification of the sustainability criteria of its suppliers through a global digital platform  Green Procurement
	Compliance with the contractual commitments	Wind Tre Convention
	Continuity of the relationship	Supplier audits
	Innovation	Supplier risk assessments
		Privacy compliance checks  Partnership initiatives
<b>Institutions</b> <ul style="list-style-type: none"><li>• Regular authorities (Privacy, Antitrust, etc.)</li><li>• National and local government institutions (MIMIT (former MISE), Local authorities, etc.)</li><li>• Judicial and Prosecutorial Offices</li><li>• Bodies of the Judicial Authorities (Police Forces)</li><li>• Civil Protection Authority</li></ul>	Network reliability and coverage	Ongoing dialogue with local, domestic and European institutions on all issues relating to Telecommunications and digital innovation
	Privacy and data security	Specific round tables
	Digital divide	The “Borghi Connessi” project
	Local investments	Project: Smart Partner of 100 Smart Cities
	Legal compliance	Participation in institutional round tables

Stakeholder	Topics of greatest interest	Main initiatives
<b>Wind Tre People</b> <ul style="list-style-type: none"><li>• Employees</li><li>• External collaborators</li><li>• Union Representatives and Organisations</li></ul>	Company results and strategies	2gether tour  Company talks  Corporate communities
	Skill assessment	Events
	Work/private life reconciliation	Human working and welfare initiatives
		Pathways for the involvement of new talents
	Equal opportunities	Project Gender parity
		Engagement Survey
	Workplace health and safety	Training
		Workers' health and safety certification
	Transparency	Whistleblowing

The most recent process for identifying the most relevant topics was conducted by Wind Tre starting at the end of 2021, and directly involved stakeholders in updating the corporate materiality matrix, as well as in building scenarios and solutions to outline their medium/long term objectives, and the scenarios supporting the SDGs of the Global Agenda.

Starting with a list of 250 topics, and following a discussion involving the sector’s main companies at the national and international levels, through relevance analyses and subsequent consolidations, a set of 15 key topics were identified, which would be discussed at a workshop held with selected stakeholder representatives. The “workshop” format was chosen in order to allow the representatives to directly discuss and agree upon the relevant topics’ order of priority.

The representatives to be involved in the workshop were selected based on the organisation’s significance as a Wind Tre counterpart, and the degree to which the selected person was considered to be representative of this organisation. 18 people, who would be able to provide privileged perspectives thanks to their wealth of experience, skills, values and relationships<sup>9</sup>, were chosen to represent the various categories of corporate stakeholders.

After the stakeholder workshop, Wind Tre held additional separate workshops involving 28 managers, representing all the company departments, and 15 employees under the age of 30.

At the end of this process, the company identified the 7 key topics upon which its sustainability narrative and programme for the coming years would focus, which were inspired by the most widespread global reporting standards, and were arranged based on the impacts perceived as priorities for the company. Finally, by associating the material topics identified with the CK Hutchison Group Sustainability Framework and the most relevant SDGs, the company launched an internal discussion to develop its own ESG plan, which consists of 10 objectives to be achieved between 2024 and 2030: 10 challenging goals to eliminate any distances between people.

This process was also an opportunity to reaffirm the importance of Wind Tre’s two fundamental enabling factors (its telecommunications network, and the network of people who comprise and operate the company), as well as certain basic values that have always been always part of its DNA: closeness to its customers, and ethics in carrying out all of its activities.



**ESG PLAN**  
10 goals to be achieved between 2024 and 2030

<sup>9</sup> Representing the stakeholder categories concerned, the following took part in the materiality analysis process: 4 representatives of Third Sector Entities, 2 representatives of the world of national and international finance, 4 representatives of large companies, 5 representatives of institutions (Central PA, research institutions and universities), 2 representatives of consumer associations and one of the press

Material topics Description	Work areas	Impact	Impact description	Actions to mitigate the negative impact
<b>Protection of minors in the digital environment</b> Providing younger and/or inexperienced users with clear and effective tools to recognise and protect themselves against the risks posed by the internet and to generally avoid any difficulties that may arise from the misuse of digital technologies	<b>More Responsibility</b>	(-)	Vulnerability of minors in accessing digital resources without adequate preparation	ESG Plan – Goal 1 “Families 100% aware”
		(+)	Reduction of the vulnerability of minors to online risks by increasing awareness	
<b>Cybersecurity and privacy</b> Guarantee of maximum data protection and continued investments in cybersecurity infrastructures to protect the company's data assets and sensitive customer data, guaranteeing their privacy at all times.		(-)	Social perception of the IT security and personal data protection risks associated with banking operations, online purchases, etc.	ESG plan – Goal 4 “Companies 100% secure”
		(+)	Increased protection for public and private customers, thanks to infrastructure security and the dissemination of protection services	
<b>Digital divide</b> Reduction of the digital divide, to the point of overcoming it, while at the same time ensuring the development of an inclusive, accessible, and affordable network, to the benefit of those who risk being excluded from it for social, economic, or geographical reasons.	<b>More Humanity</b>	(-)	Difficulty for a portion of the population to enjoy the benefits of digitisation due to lack of skills and infrastructure	ESG Plan – Goal 7 “Connected Villages” ESG Plan – Goal 2 “Seniors 100% Connected”
		(+)	Commitment to the dissemination of digital skills, and targeted expansion of the network infrastructures to areas and population categories where the digital divide is greatest	
<b>Continuous digital learning</b> Support for people of all ages in facing the challenges posed by an increasingly hybrid form of digital and in-person education, promoting the use of continuous digital learning to prepare people to face the challenges of the future. Supporting training programmes for skill improvement and development. Identifying and nurturing young talents.		(-)	Lack of basic digital skills resulting in loss of economic and social opportunities	ESG Plan – Goal 3 “100% “future-ready” people
		(+)	Dissemination of the skills necessary to face change, and to prepare people of all ages for the new challenges of the digital transformation	
<b>Inclusion of people with disabilities</b> Listening and promptly responding to the needs of people with disabilities, even through dialogue with the relevant associations and non-profit organisations. Offering people with disabilities a work environment that's tailored to their needs. Making our digital channels accessible to everyone.		(-)	Difficulty on the part of people with disabilities to participate in social life on an equal basis	ESG plan – Goal 5 “Digital accessibility for people with disabilities”
		(+)	Increased inclusion, also thanks to the potential of connectivity and digital technologies acting as enabling factors	

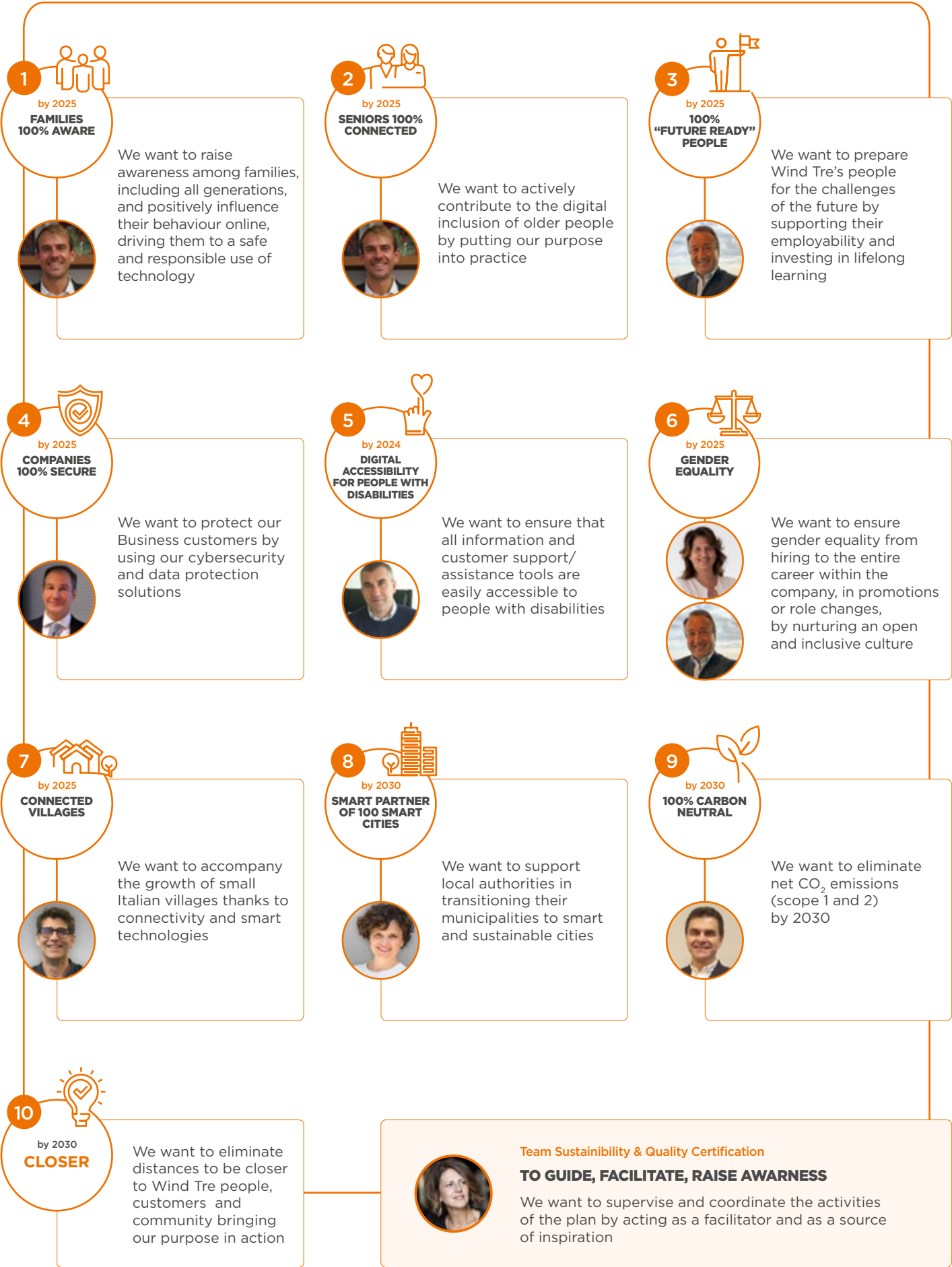
Material topics Description	Work areas	Impact	Impact description	Actions to mitigate the negative impact
<b>Decarbonisation</b> Reduction in directly generated CO <sub>2</sub> emissions, and empowerment of all other subjects to reduce their own emissions.	<b>More Green</b>	(-)	Failure to reduce atmospheric CO <sub>2</sub> emissions and worsening of the climate risk	ESG Plan - Goal 9 “100% carbon neutral”
		(+)	Reduction of the climate impacts of the infrastructures and the business activities, and empowerment of customers to reduce their own Impacts thanks to the services offered	
<b>Smart technologies for society and the environment</b> Facilitation of research and creation of network infrastructures that support the dissemination of innovative technologies, seizing upon contamination opportunities with other sectors and with essential services, for positive social and environmental impacts.		(-)	Delay in the development of enabling platforms and solutions for the digital and energy transitions	Investments in the upgrading of the telecommunications network
		(+)	Development and dissemination of services based on connectivity and digital technologies capable of enabling the twin transition	ESG Plan - Goal 8 “Smart Partner of 100 Smart Cities”

THE 2030 ESG PLAN

Starting with the material topics (as identified together with representatives of stakeholders and management according to the process described above), the CK Hutchison Group Sustainability Framework, and the most relevant SDGs, in 2021 Wind Tre once again initiated an

internal dialogue to establish its new ESG plan.  
  
The plan includes 10 challenging goals aimed at mitigating the negative impacts and enhance the positive ones, which will be fully integrated into the company's business between 2024 and 2030.





# THE SUSTAINABILITY GOVERNANCE MODEL

GRI 2-13 GRI 2-14 GRI 2-17 GRI 2-18 GRI 2-19

Wind Tre's ESG plan is consistent with the company's business activities, and breaks down the goals into **concrete indicators and measurable target values**.

In order guarantee and monitor the implementation of the plan and the achievement of the expected performance levels, a governance model has been established, with a **structure that covers every level of the company, and an approach designed to foster collaboration** between the various divisions.

The individuals responsible for implementing the ESG Plan, delegated by the Management Team<sup>10</sup> at the time of the Plan's establishment, are referred to as the **Sustainability Ambassadors**, and consist of **Wind Tre top managers who operate in the various company areas**, and coordinate all the divisions involved in the process. They communicate with the Project Managers to determine the activities to be implemented, and interact with the Supporters to better coordinate the activities within the various departments. The **Sustainability Project Managers**, one for each goal, check

that the activities for their assigned goals have been implemented, and monitor their progress in accordance with the guidelines shared with the Ambassadors. They also monitor the Supporters' activities and ensure that all the efforts are properly aligned, facilitating the resolution of any potential problems.

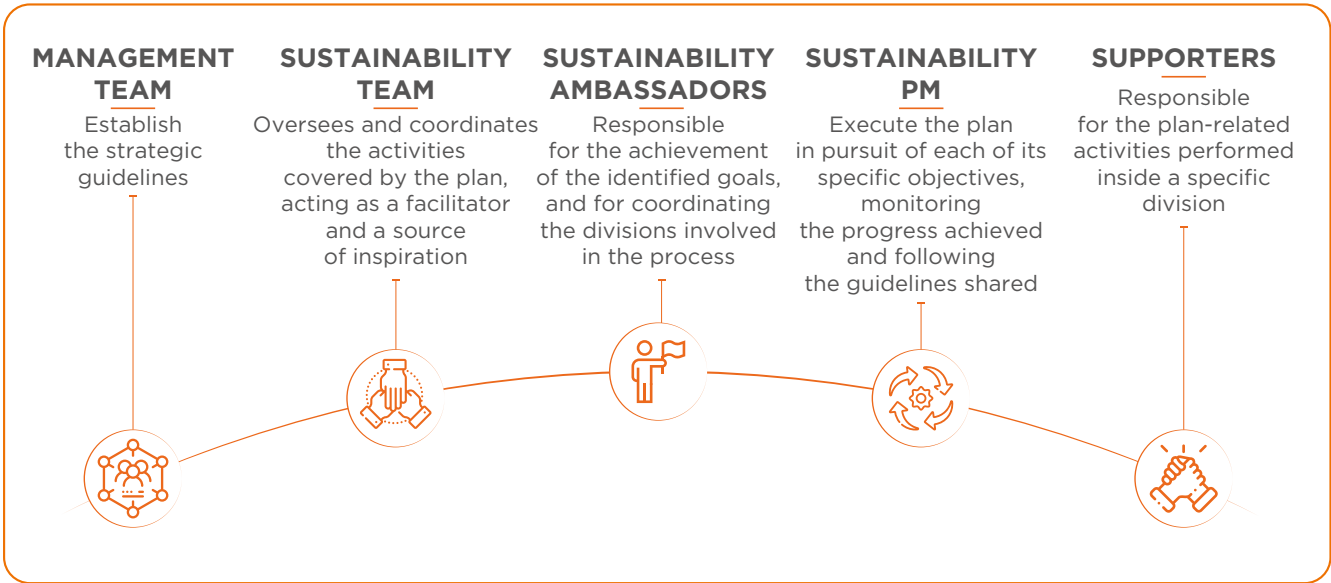
Lastly, the more than 60 **Sustainability Supporters** play a key support role with respect to the Ambassadors and the Sustainability Project Managers, by making sure that each department manager is up-to-date on the Plan's implementation.

Every quarter, with the coordination of the "**Sustainability & Quality Certification**" Department, the Ambassadors and Project Managers meet to share the progress of the sustainability projects for which they are responsible, in an effort to seek out possible synergies between their projects and to share information about the activities to be carried out. The Plan's progress is then presented to the Management Team, in order to call their attention to any critical issues that might arise during the reference period.



## SUSTAINABILITY AMBASSADORS

Wind Tre top managers responsible for implementing the ESG Plan



<sup>10</sup> The Wind Tre Management Team is made up of the two Co-CEOs and the managers in charge of each company department who report directly to them. For further details see previous chapters and [www.windtregroup.it](http://www.windtregroup.it)



The Management Team can evaluate any changes and/or additions to be made to the Plan and the relative Goals in order to ensure a more effective achievement of the objectives. After an initial test carried out in 2021, in 2022 sustainability indicators linked to all ten goals of the ESG Plan were introduced into the **annual Short Term Incentive Plan (STIP)**-- established in 2022 with a horizon of 31 December 2022), with the goal of engaging all the Wind

Tre Managers. Almost all of the KPIs analysed for the achievement of the objectives have reached the targets set for the year. Moreover, in order to ensure consistency with the long-term perspective proposed by the 2030 ESG Plan, a number of the ESG Plan's KPIs regarding people and the environment have also been included in the **Long Term Incentive Plan (LTIP)**, with a horizon of 2023 and 2024.

THE REWARDING PROCESS

The overall reward plan (fixed and variable remuneration), envisaged for Senior Executives (first line of co-CEOs and second line of co-CEOs) is approved by the co-CEOs. Human Resources collects proposals from the managers and creates the reward hypothesis based on external benchmark data.

Once approved by the co-CEOs, the HR department submits the proposals to the shareholder for final approval. Special entry bonuses are also envisaged in order to offset the economic losses incurred by newly hired executives as a result of their resignation from their previous places of employment (e.g. non-payment of incentive plans linked to on-site presence at the time of disbursement). The relevant package of redundancy incentives is valued taking into account the monthly salaries envisaged as indemnity in lieu of notice in the event of dismissal (Article 23 of the National Collective Labour Agreement for Managers of Companies Producing Goods and Services) and the average amount of the monthly salaries envisaged as a supplementary indemnity recognised by law for illegitimate dismissal (Article 19 of the National Collective Labour Agreement for Managers of Companies Producing Goods and Services).

The "repaymentserviceion (i.e. reimbursements of previously received compensation that a board member or senior executive must pay to the organisation if certain conditions of employment or objectives are not met) does not apply. In July of 2022, an agreement was signed between the Company and the Executives Union for the establishment of an early retirement plan for Executives who meet the minimum requirements for old-age or early retirement during the four years following the termination of their employment relationship based on an agreement voluntarily reached between the Executive and the Company.

The remuneration of the senior executives varies, and is linked to the achievement of financial, business, operational, and sustainability objectives. The sustainability objective is an indicator made up of several KPIs, and some of these relate to people and the environment.

The 2022 research reports

Once again in 2022, Wind Tre promoted a series of studies and reports by major research centres, universities and think tanks, which were mainly aimed at improving the dialogue surrounding the role that telecommunications (and digital technologies in general) play in relation to society, the economy, and the environment.

The main contributions published during the course of the year are shown below.

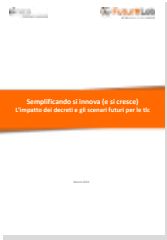


2nd Wind Tre-Censis Report "Experiencing and evaluating digital life"



What exactly does the digital life experienced by citizens consist of? What are their expectations and assessments? These are the questions at the heart of the Wind Tre-Censis Report, which, starting from the successful transition to digital life, verifies whether and to what extent Italians benefit from digital opportunities in significant areas of their lives. It's a unique reflection of the variety of concrete "digital life" experiences, which also allows us to evaluate whether the right to be connected, as a further right of citizenship, is currently little more than a dream, or a concrete reality. The report covered three areas:

- the relationship that Italians have developed with the internet throughout these years of digital life, with a focus on the types of connections, the expectations from services and telecommunications providers, the meaning attributed to 5G technology, and the need for IT security;
- the subjective approaches to the cultural and entertainment content accessible via web platforms, with a particular focus on Italian citizens' perceptions of the effects they are having on society;
- the citizens relationship with the digital Public Administration and its services, including verification of actual uses and assessments by citizens.



1st Talk Future Lab I-COM March 2022 - Innovating (and growth) through simplification. The impact of the decrees and future scenarios for Telco companies.



The preliminary analysis carried out by I-Com, based on interviews with operators aimed at collecting their experiences and points of view, as well as possible suggestions for improvement, has highlighted numerous weaknesses, above all with regard to the application phase of the national regulations, even despite the fact that the simplification interventions were only quite recent, and the final assessment of their actual impact on the procedures and time frames for the construction of the fixed and mobile telecommunications infrastructures certainly requires a longer observation period. In addition to significant room for improvement with respect to the infrastructural development planning activities at the local level, the following were also identified:

- a notable lack of harmonisation at the national level;
- significant application issues<sup>11</sup>.




2nd Talk Future Lab I-COM July 2022 - The twin transitions: digital and sustainability, working together to change Italy.




After reviewing the main pillars of sustainability policies, this paper prepared by the Institute for Competitiveness (I-Com) and Join Group focuses on the contribution that digital innovation can make to accelerating their implementation at both the macro (society) and micro (companies and citizens) levels, through new ICT technologies and their increasing pervasiveness, accompanied by an overhaul of the business models and company strategies, and

<sup>11</sup> These include: frequent and widespread violations of the deadlines established by the legislation for the issuance of opinions and authorisations, lack of participation in the established round tables (namely ENAC/ENAV and Civil Engineering), delays in the adoption of ordinances, and unjustified and illegitimate application of charges in addition to and different from the fee envisaged under article 1 paragraph 816 of Law No. 160 of 27 December 2019

significant changes in **behaviours and practices**, thus rendering them more virtuous. All without compromising (but rather improving) economic growth and lifestyles.



**3rd Talk Future Lab I-COM**  
**October 2022 - Smart Cities:**  
**what point are we at on the path**  
**towards future-proof cities.**



The digital transition is having a profound impact on society, changing people’s habits and the way they experience urban environments. In this constantly changing context that’s increasingly attentive to technological change in terms of improving the quality of life of citizens, I-Com conducted **a qualitative analysis of the latest visions and initiatives in the field of smart cities from Italy’s main capitals to its largest metropolitan centres**. The qualitative research took place through the oral administration of a questionnaire focusing on some of the most relevant innovations, gathering experiences, perspectives, and suggestions for their improvement. The results of these interviews were systematically analysed in order to identify common trends and initiatives, with the aim of understanding the type of approach that’s emerging from the digital sector in favour of the digitisation of cities, the initiatives that have been launched, carried out, or planned, and

the main advantages and potential obstacles associated with the initiatives promoted within the framework of the NRRP.



**4th Talk Future Lab I-COM**  
**November 2022**  
**“No Telecommunications,**  
**no Transition 4.0”**



The analysis conducted showed the **concrete benefits and extraordinary opportunities that accompany the adoption of 4.0 technologies, services, and solutions in terms of competitiveness**. It’s a paradigm that’s now become indispensable for the fabric of the Italian production sector to remain at the forefront and to play a leading role in international competition. The digital transformation represents one of the main challenges faced by companies, with technologies like **artificial intelligence (AI)**, the **Internet of Things (IoT)**, and **the cloud**.

And since these are united by the shared need to have access to data at all times, it is **necessary to guarantee secure and reliable connectivity** to the systems responsible for processing the various types of information. Increased security for working on the move is also a fundamental characteristic, as is the improved quality of the services offered, and the improved performance of the network itself.

RISK MANAGEMENT

As required by the CKHH Group, Wind Tre has also adopted an organisational structure to oversee the **Enterprise Risk Management** process, which operates in accordance with the CKHH Group Policies and the international best practices.

The company conducts a Risk and Internal Control Self Assessment twice a year, which **covers the ESG topics**. The aim of this assessment is:

- **to identify the risks** that could potentially have an impact on the company in general, including its business activities and processes, and to evaluate them in terms of impact and probability;
- to identify and **evaluate any mitigating measures** planned by the management in response to the identified risks;
- to update and maintain the **corporate risk register** (Risk Universe);
- to send a **specific report to the CKHH Group** every six months (the so-called

Risk Management and Internal Control Assessment Declaration).

This activity, which is managed by the Audit, 231 Compliance & Risk Management Department, involves the entire management, with the aim of identifying and assessing the risks and the effectiveness of the internal controls at both the Entity level (risks strictly associated with the Company’s strategic objectives) and the process level (risks and controls associated with the main company processes).

The project launched in 2021 for the review of the methodology and process adopted for the Risk Management activities was completed during the first half of 2022.

During the second half of 2022, however, a new project was launched aimed at establishing specific “Key Risk Indicators” (KRIs) useful for improving the risk identification and assessment methodology.

This project is expected to be completed in relation to the main company processes by the end of 2023.







## MORE RESPONSIBILITY

We believe that companies must proactively work for the socio-economic development of the communities in which they operate and for the protection of their customers. That's why we have adopted a governance model aimed at guaranteeing **maximum fairness for customers and partners alike, and introducing sustainability priorities into our business activities**. We believe that **digital responsibility** is the key to sustainable and inclusive technology: we're committed to **ensuring maximum online security by protecting the sensitive data and privacy** of all our customers, and protecting the **most vulnerable categories** of users, such as minors and seniors, **against potential online threats**.

- Business ethics and integrity •
- Child protection in the digital domain •
- Cybersecurity and privacy •
- Closer to our customers •



[BACK TO SUMMARY](#)



# BUSINESS ETHICS AND INTEGRITY

Companies are increasingly reflecting on the possibility of viewing social responsibility as an opportunity and a challenge around which to reshape their governance structures.

Companies should set themselves the **goal of adopting a governance model that takes social and environmental sustainability into account**. Corporate ethics are one of the added values necessary to attract new and young talents, who consider principles like sustainability and inclusion to be priorities at the workplace.

According to a study involving over 500 companies worldwide, management and employees both consider good governance, ethics, and transparency to be among the most important corporate values. Like in previous years, Integrity<sup>12</sup> was once again the most cited individual value in 2022.

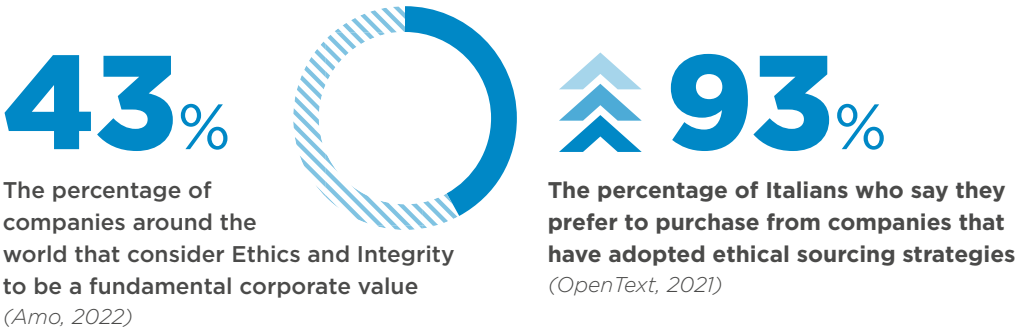
Consumers, on the other hand, tend to place a greater focus on the relationship that's established with the supply chain: **6 out of 10 Italian**

**consumers evaluate a brand based on its relationship with its suppliers<sup>13</sup>.**

The adoption of a **code of ethics** or specific **codes of conduct** are the first steps towards the implementation of sustainable governance, as they also render the company's work and commitments visible externally. The latest version of the Corporate Governance code for listed companies from 2020 marks a fundamental step in highlighting the important role that sustainability plays within the company.

The Code introduces the concept of "sustainable success" for the first time, defining it as the management body's guiding objective for creating long-term value for the benefit of the shareholders, which also takes into account the interests of other stakeholders relevant to the company<sup>14</sup>. In order to achieve these objectives, it is also essential to establish an ESG Committee: a tool that's becoming increasingly widespread among organisations that are already sustainability-oriented. .

12 Amo: Values Most Valued, 2022  
13 OpenText: Ethical Supply Chain, 2021  
14 Borsa Italiana: Corporate Governance Code for Listed Companies, 2020




## What it means to us

- Establishing a solid corporate governance structure to protect the rights and interests of all the stakeholders.
- Being as transparent as possible in every activity carried out.
- Complying with the most stringent regulatory standards and ensuring proper governance.
- Carefully evaluating the entire supply chain and the partners with whom we collaborate.
- Determining the tools necessary to guarantee ethical conduct and proper behavioural management.



Governance instruments

GRI 2-16 GRI 2-23 GRI 2-24



**CODE OF CONDUCT**

The document that summarises the company behavioural guidelines

Wind Tre has **established a structure designed to ensure a correct and efficient system of corporate governance and to protect the rights and interests of its investors and all other stakeholders**, always choosing to go beyond mere compliance with the legal and regulatory requirements. It is also committed 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. In carrying out these activities, the group's staff is asked to follow the behavioural guidelines contained in the **Code of Conduct**, and numerous other group policies, in order to bolster the company's credibility and reputation within the context in which it operates.

For each of the subsidiaries, Wind Tre has adopted an **Organisation and Management Model pursuant to Italian Legislative Decree no. 231/01**, which indicates the rules and control principles suitable for preventing crimes, and has appointed a collegial **Supervisory Body**, consisting of two external professionals and an internal manager, who is tasked with supervising the adequacy and effectiveness of the Model itself.

Within the context of monitoring the functionality and observance of the Organisation, Management and Control Model pursuant to Legislative Decree no. 231/01, each company's Supervisory Body **immediately reports any significant critical issues encountered** (such as any serious violations of the Organisational Model, the Code of Conduct, and/or other company policies or procedures, serious violations of the applicable laws, whistleblower reports received that initially appear to have significant economic and reputational repercussions) to the Board of Directors, the Chief Executive Officer, and the Board of Statutory Auditors.

Even in the absence of any significant critical issues, as was the case with the January-December 2022 reporting period, the Supervisory Bodies periodically report on their work to both

the Board of Directors and the Board of Statutory Auditors. The Code of Conduct is the official Wind Tre Group document containing the group companies' rights, duties, and responsibilities towards the stakeholders (employees, suppliers, customers, the public administration, etc.). The code can therefore be understood as a collection of ethical and behavioural principles, and, together with the Organisation, Management and Control Models, constitutes an essential part of the internal control system aimed at preventing the commission of the crimes envisaged by Legislative Decree no. 231/01.

The principles laid out in the Code, which Wind Tre upholds in order to ensure ethical and responsible business conduct, are the following: legality, transparency, integrity, fairness, respect for human rights, equal opportunities, non-discrimination, equality, professionalism, and collaboration.

The Code and the Models are approved by the Boards of Directors of each company, are disseminated to all the employees via messages from the Chief Executive Officers, and are posted on both the company intranet and the corporate website, where they can be viewed by all the stakeholders (<https://www.windtregroup.it/en/governance/code-of-conduct-and-om.aspx>).

All the employees also formally undertake to accept and comply with the provisions of the Code of Conduct and the Model, both at the time that they are hired (by signing a specific declaration) and whenever the Code and the Model are updated (via an application on the company intranet).

Moreover, in line with Legislative Decree no. 231/01, the current anti-corruption legislation, and national and international best practices, Wind Tre has adopted a series of policies and procedures (The Anti-Fraud and Anti-Corruption Policy, The Anti-Fraud and Anti-Corruption Guidelines for Suppliers, The Supplier Code of Conduct, The Conflicts of Interest Procedure, The Business Partner Due Diligence Procedure, The Whistleblower Reports Management Proce-

dures, and The Gifts and Hospitality Procedure) approved by the Wind Tre S.p.A.<sup>15</sup> Management Team, which are referenced directly in the Code, are posted on the company intranet or the corporate website, and are duly disseminated to all the employees, as well as to third parties (where applicable). Of these, the Anti-Fraud and Anti-Corruption Policy is also formally accepted by all the employees at the time that they are hired, by signing a specific declaration.

With regard to the policies directly applicable to all third parties who entertain relations with Wind Tre in any capacity, the Group's objective is to work with partners who operate in full compliance with the principles laid out in the **Supplier Code of Conduct** and in the **Anti-Fraud and Anti-Corruption Guidelines**. These documents are posted on the corporate website and are referenced in all contracts stipulated with third parties. Compliance with the rules contained in the Supplier Code of Conduct and the principles contained in the Anti-Fraud and Anti-Corruption Guidelines is considered an integral and substantial part of the obligations assumed by partners in their dealings with any Wind Tre Group companies, in any capacity and for all legal purposes.

With regard to **human rights**, Wind Tre is inspired by the principles laid out in the CK Hutchison Holdings Limited Group policies<sup>16</sup>, and those contained in the fundamental conventions of the ILO (International Labour Organization), in the United Nations' Universal Declaration of Human Rights, and in the provisions of the UK Modern Slavery Act of 2015, as amended; as far as internal policies are concerned, the company has also set aside specific sections for the discussion of this topic in both its Code of Conduct and its Supplier Code of Conduct, which specifically indicate all the categories of stakeholders to which reference is made.

Finally, in accordance with the current legislation, and based on the guidelines issued by the Antitrust Authorities regarding the protection of competition, Wind Tre has adopted an **Antitrust Compliance Program**, which all the employees are required to know and respect. The Group's objective is to disseminate a culture of market competition in order to be able to identify new opportunities for the company, and reduce the risk of anti-competitive behaviour and

unfair competition. Furthermore, the adoption and full acceptance of the Antitrust Compliance Programme offers important benefits for the company, guaranteeing tangible advantages for understanding and preventing behaviours and actions which, in an extremely competitive market context, could lead to negative and punishable consequences, not only for the company, but even at the individual level.

With regard to the supervisory activities concerning the correct application of the commitments undertaken, the risk management activities, and the internal control system, **Wind Tre oversees the correct application of the policies and procedures through:**

- supervisory and monitoring activities by the Supervisory Body regarding the effective application of the Organisation, Management and Control Model;
- periodic audits of the business processes, conducted internally and by CK Hutchison Holdings Limited group;
- half-yearly risk assessments of all the company processes;
- periodic training on the main company policies and procedures.

All of the above activities are formally documented in reports, and are shared with the company management and shareholders, with the aspects regarding the work carried out by the Supervisory Body being shared with the Board of Directors and the Board of Statutory Auditors as well.

If the audits reveal any critical issues/violations of internal processes and regulations, adequate "remediation" actions are taken, which are constantly monitored in order to ensure their proper implementation.

Moreover, any employees who violate the provisions of the Code of Conduct or the Model, or the general indications contained in the company policies and procedures, are subject to the application of disciplinary penalties in line with that which is established by the current legislation and by the national collective labour agreement for the Telecommunications sector.



**SUPERVISORY AND MONITORING**

Wind Tre verifies the correct application of policies and procedures through a Supervisory Body, periodic audits, risk assessment and training processes

<sup>15</sup> The Wind Tre S.p.A. Management Team has established specific proxies due to the management and coordination role that it plays for all the group companies

<sup>16</sup> The company is also working to implement the precautionary principle of the United Nations' Rio Declaration on the environment and development within all of its corporate policies

Lastly, Wind Tre also carries out audits and monitoring activities in relation to its partners, in order to ensure that they do not engage in any conduct that is not consistent with the provisions of the Code and the Anti-Fraud and Anti-Corruption Guidelines.

Fight against corruption and conflicts of interest

GRI 2-15

**Conflicts of Interest** among the members of the Boards of Directors are managed pursuant to Article 2391 of the Italian Civil Code<sup>17</sup>. Also, as required by the Wind Tre Conflicts of Interest procedure, any actual or potential conflicts of interest on the part of the Chief Executive Officer must always be reported to the Audit, 231 Compliance & Risk Management Director and the Director of Human Resources, and shared with the sole shareholder, in order to have the relevant assessments carried out.

In fact, in 2017 Wind Tre adopted a **Conflicts of Interest Policy** in order to provide guidelines for identifying any actual or potential conflict of interest situations, and to establish the relative communication and management process. Using a special digital platform on the company's intranet, all employees must declare whether they find themselves in any situations that effectively or could potentially constitute an actual or potential conflict of interest.

If any changes should take place regarding the content of their most recent declarations, the employees must promptly notify the company by changing their declarations via the platform. Wind Tre reserves the right to conduct a periodic survey of the employees' conflicts of interest.

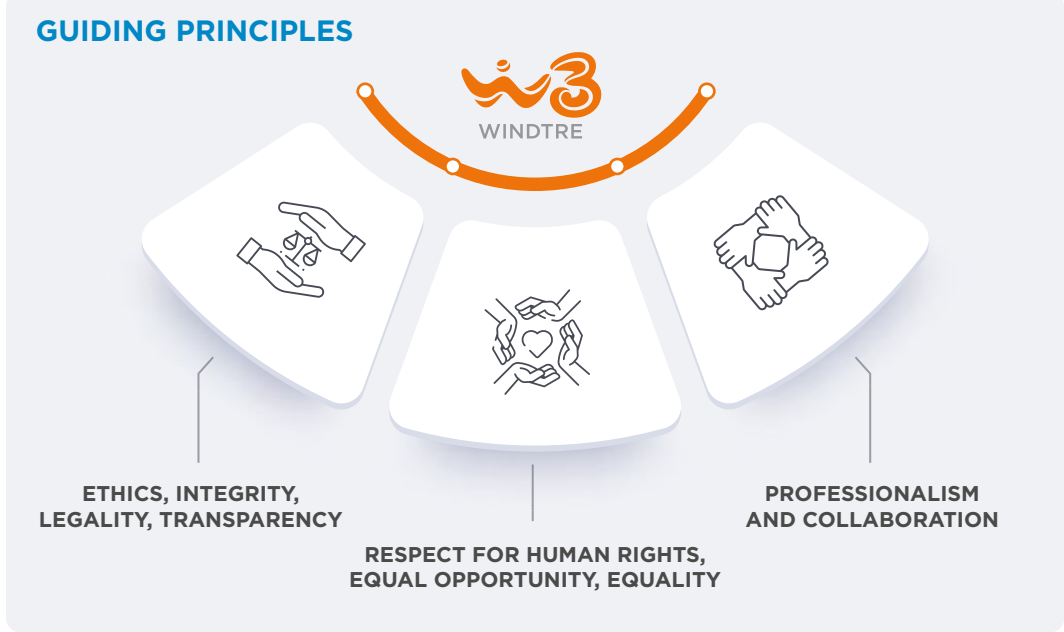
Wind Tre has been a **member of Transparency International Italia** since 2019: the Italian branch of the largest anti-corruption group in the world. That same year, Wind Tre established an **Anti-Fraud and Anti-Corruption Policy** that describes the concepts and ethical standards to be respected during the management of the company's activities in order to mitigate the relative risks and ensure compliance with the current standards and regulations, drawing upon the organisation's best practi-

ces. In 2021, Wind Tre adopted its **Anti-Fraud and Anti-Corruption Guidelines for Suppliers**, which establish the ethical principles and minimum control standards with which all Wind Tre suppliers and any third parties involved in contractual relationships with Wind Tre must comply in order to prevent and combat fraud and corruption, and guarantee compliance with the current regulations.

Wind Tre has established a **Due Diligence procedure for its business partners**, which, using a "Risk Based" approach, is applied to any third parties deemed to be at greater risk of non-compliance with the anti-corruption legislation, and therefore posing a greater reputational risk, prior to the establishment of a new business relationship, or the extension or renewal of an existing relationship. By way of example, suppliers in the procurement area, consultants, and business sales agents are subject to due diligence procedures. **223 due diligence procedures** were carried out in 2022. At the same time, Wind Tre established a **Donations and Sponsorships Procedure** and a **Gifts and Hospitality Procedure**, which determine methods according to which these initiatives are managed, in compliance with the current laws, and the principles of ethics, professionalism, transparency, correctness and fairness, which the company seeks to uphold in its fight against corruption. In 2022, in-depth preliminary analyses were conducted on all donations and sponsorships carried out during the year, specifically: 6 donations, 23 sponsorships, and 3 strategic initiatives aimed at improving Wind Tre's reputation and image in the social and environmental arenas in which it operates.

During the course of 2022, specifically in the month of July, the new version of the CKHH Group policy (The Group Corporate Communications Policy) was issued, which, among other things, also regulates the authorisation process to be adopted for donations and sponsorship initiatives. At the local level, Wind Tre has adopted a governance process for the initiatives that incorporates the indications laid out in the Group policy.

In 2022, **training** with a risk-based approach was provided on **Legislative Decree 231**, identifying which Wind Tre S.p.A. corporate departments were most exposed to the risks of 231 predicate offences (including the crime of



corruption). The goal of the training sessions was to raise awareness among the managers and employees of the 231 risks associated with the sensitive areas of the Organisation, Management and Control Model applicable directly to them (e.g.: Management of Sales and Commercial Contracts, Relations with the Public Administration, Management of Entertainment Expenses, Management of Purchases, Management of Gifts, Organisation of Events, etc.), with a focus on the relevant corporate processes and the main control points for preventing the risks of 231 crimes.

The main departments involved are the following: Procurement, Legal, Business Sales, External Affairs & Sustainability; for a total of 219 employee participants.

Whistleblowing

GRI 2-26

Wind Tre's Whistleblowing procedure **describes the process for receiving and managing reports of any conduct that could effectively or potentially constitute a violation of the Code of Conduct**, the 231/01 Model, the company policies and regulations, and/or the current legislation.

The procedure provides for **various commu-**

**nication channels to be used by employees and third parties** in order to report actual or potential unlawful conduct, even anonymously: an online platform, an e-mail address for the Supervisory Bodies, and an e-mail address managed by the Audit, 231 Compliance & Risk Management Department.

The web platform is managed by a third party company, which guarantees absolute confidentiality to the whistleblower using IT means (pursuant to art. 2 paragraph 3 of Italian Law no. 197/2017).

The Audit, 231 Compliance & Risk Management Director oversees and manages the reporting process, and contacts the necessary company departments in the event of a violation, determining the actions to be taken based on the severity of the violation itself.

The possibility of using the **web platform** to report violations of the **SA 8000 International Standard** (Social Responsibility), in cases of non-compliance with the rules on the protection of human and worker's rights and on workplace health and safety, was also introduced in 2021.

Finally, on 30 March 2023 the Legislative Decree 10 March 2023 n. 24 adopting the EU Directive on Whistleblowing 2019/1937 concerning the protection of people who report violations of EU law, has entered into force.



POSSIBILITY TO REPORT

A plurality of channels of communication aimed at employees and third parties allow the reporting of actual or potential unlawful behavior, even anonymously

<sup>17</sup> Pursuant to art. 2391 of the Italian Civil Code, "any Director who, in a given transaction, has an interest on his/her own behalf, or that of a third party, that is in conflict with that of the company, must notify the other directors and the board of statutory auditors, and must refrain from participating in the resolutions concerning the transaction itself"



MAIN PROCEEDINGS

Compliance with the laws and regulations.

GRI 2-27

Cases opened and closed in 2022

Between the end of 2021 and 2022, 9 cases and information requests were opened by AGCOM and AGCM, 5 of which were closed by AGCM without any sanctions. A summary table is provided below:

PROCEDURE	AUTHORITY	SUBJECT	OPENING	CLOSURE	PENALTY
DS2933	AGCM	E-Sim Cards (costs and activation methods)	15/09/2021	07/09/2022	NO for the archiving of the case
12/21/DTC	AGCOM	Carrier billing	03/11/2021	12/04/2022	348,000.00 €
DS3022	AGCM	Methods of activating and cancelling the Smartphone Reload service	21/12/2021	23/02/2022	NO for the archiving of the case
PS12236	AGCM	Use of the expression “5G” in offers, and indication of the conditions of use to customers	12/01/2022	25/08/2022	NO for the archiving of the case
PS12312	AGCM	Use of the expression “Unlimited Giga” in offers and relative limitations	17/03/2022	21/09/2022	NO for the archiving of the case
PS12307	AGCM	The “Di Più Lite” offer, and the indication of its variants (with regard to the residual credit or automatic payment method) on the WINDTRE website, with the bundle components being specified in the versions marketed	29/03/2022	10/05/2022	NO for the archiving of the case
PS12305	AGCM	Remodulation + possibility for the customer to maintain the costs and contents of the previous offer through OPTIN	11/04/2022	08/11/2022	€ 5,000,000.00
PS12303	AGCM	Invoicing after withdrawal	28/04/2022	-	In progress
3/22/DTC	AGCOM	Costs of withdrawal pursuant to res. 487/18/CONS	30/12/2022	-	In progress

The text below provides a brief description of the measures among the proceedings which have led to a sanction, or which are still in progress.

AGCM case no. PS/12305

In November 2022, case no. PS/12305 opened by the Antitrust Authority was closed with a fine of € 5 million. AGCM challenged Wind Tre for an alleged violation of art. 65 of the Consumer Code for having made a unilateral change to the offer, with the possibility for the customer to maintain the costs and conditions of the changed offer. This was interpreted by the Authority as a violation of the prohibition on binding the consumer to an offer that entails an additional payment with respect to the payment agreed upon in the main contract, without their express consent having been requested “in advance”. Wind Tre explained that the change contested – i.e. granting the customer the possibility of maintaining the costs and conditions of the offer – was entirely legitimate, as it was entirely in favour of the customer, who was given the option to choose to return to the original plan lost upon receipt of the communication of the unilateral change. However, despite the arguments advanced by Wind Tre and the lawfulness of its conduct, as also confirmed by AGCOM, which returned to the AGCM an opinion entirely in favour of Wind Tre, with regard to the provisions of Legislative Decree no. 207/2021, the AGCM fined Wind Tre for an amount of € 5 million in November of 2022 in objection to the campaign to amend the contractual conditions launched by Wind Tre at the end of 2021. Wind Tre has submitted an appeal, which is still pending. In November of 2022, Wind Tre complied with the disciplinary measures and launched a new campaign for the unilateral alteration of the contractual conditions, with the possibility for the customer to restore the previous offer, which, in light of the previous complaint, was announced with two separate messages, rather than with a single message.

Carrier Billing

On 3 November 2021, AGCOM provided service of process for the start of sanction proceeding 12/21/DTC. With regard to the Premium services covered by Resolution 10/21/CONS, AGCOM deemed that Wind Tre did not fulfil its obligation (both for new SIMs and those already available to the customer) to implement barring and activation via OTP authorisation for “Carrier Billing” subscription services, and did not inform its customers about the exclusion of these services from the barring on the dedicated web pages (containing information about the blocking and activation of premium subscription services). In its defence, Wind Tre clarified that it is unable to distinguish between subscription services and one-shot services, since this distinction is only available to the OTTs, and Wind Tre sees all the services on its own systems as if they were to be one-shot services. The same position was reported by the other service providers, considering the fact that Carrier Billing service activation policies are standard worldwide, and are only controlled by the OTTs. The case ended in April of 2022 with a fine of € 348 thousand being issued due to the effective collaboration measures taken (a fine lower than that of € 754 thousand issued to TIM and of € 464 thousand issued to Vodafone). In August of 2022, competition law no. 118/2022 was enacted, art. 24 of which requires service providers to obtain proof of the customer’s prior express consent for both the activation of the Carrier Billing services and the invoicing of the same. Wind Tre has worked tirelessly since August of 2022 to require the OTTs to provide, upon request, the logs generated by the service subscription activities as proof of activation, which are in their exclusive possession, and to forward them to Wind Tre in order to allow it in turn, to show the customer’s express consent to the charge.

The case regarding post-withdrawal billing (no. PS12303)

In April of 2022, the AGCM notified Wind Tre (as well as Telecom, Fastweb and Vodafone) that disciplinary proceedings had been initiated for allegations concerning ongoing charges for the provision of mobile and/or fixed telephone services, after the consumer or micro-enterprise had expressed the desire to terminate the contractual relationship (through withdrawal, cancellation, reconsideration, or migration). Wind Tre has stated that it has never engaged in any conduct that deliberately involved continued invoicing to a customer wh’s account had been deactivated or to a customer who had expressed their desire to withdraw from their contractual obligation, spe-

cifying that there could be multiple reasons for any deviations (missing or incomplete requests from customers, system errors, etc.). Wind Tre notified the Authorities of a series of corrective measures already put in place, with impacts even on the IT systems, as well as others to be implemented in the near future aimed at definitively resolving any deviations. The conclusion of the proceedings was set by the AGCM for 24 March 2023.

**AGCOM case no. 3/22/DTC**

On 30 December 2022, AGCOM announced the start of a case contesting the amount of the deactivation costs charged to fixed line telephone customers. AGCOM believes that Resolution no. 487/18/CONS is still in force, and entails the obligation for the service provider to charge the customer a withdrawal cost equal to either the amount actually borne by the service provider or an amount equal to the average fee, whichever is less. Wind Tre, on the other hand, wrote to the AGCOM several times, many months before the case in question began, in order to point out the successful repeal of resolution no. 487/18/CONS by the European Directive instituting the new CCEE, as a result of which the service provider can charge the customer a deactivation cost equal to that which the service provider actually incurred, without the constraint of having to apply the lower one equal to the average fee. The case is currently pending.

Below are other topics that are considered particularly relevant for the company from a regulatory point of view.

**28 days**

With regard to the so-called “28 day” judicial affair, the closure of the proceedings under the regulatory profile is noted. However, the incardinated and still pending judicial proceedings remain open.

With resolution no. 121/17/CONS of 15 March 2017, AGCOM established the obligation for fixed and convergent network customers to switch to monthly charges and renewals every 30 days, as opposed to the 28-day interval applied by all Telco operators at the time. Within this context, AGCOM asked the operators to reimburse all their customers for the difference between the 28-day and the monthly billing cycle for the period of time that elapsed between the order issued with the resolution and the actual application of the monthly billing cycle. With a non-definitive ruling issued on 23 September 2020, the CDS referred some of the reasons for the aforementioned resolution’s unlawfulness, regarding the lack of power of AGCOM, as claimed in the appeals filed by Wind Tre and the other operators, to the Court of Justice of the European Union. The appeal to the Supreme Court and the appeal for the revocation of the ruling issued by the CDS on 24 February 2020, which confirmed the legitimacy of the other AGCOM resolutions on the topic of reimbursement, also moved forward. In February of 2020, AGCOM sanctioned Wind Tre, as well as other operators, for not having reimbursed the parties concerned by postponing billing for an equivalent number of days consumed. After being served with sanction no. 78/20/CONS, for which an appeal is pending before the Regional Administrative Court, no additional injunctions and/or proceedings were received from AGCOM. This resolution was challenged before the Lazio Regional Administrative Court on 2 July 2020. The individual requests for reimbursement must be handled with Corecom and the competent Courts. A number of consumer associations have filed a civil action suite on behalf of their members in order to obtain the reimbursements. In June of 2019, Wind Tre already made a list available offering the concerned customers a range of alternative compensation options to choose from, including reimbursement. In July of 2021, the Law Courts of Milan found the 28-day billing cycle unlawful, and ordered the decision to be published in two national journals. The reimbursement of the relative amounts to the customers who request them (as of June 2016) has been ordered. The court also ordered letters to be sent to former customers who deactivated service between June 2016 and April 2018. This decision was challenged with a pre-emptive injunction awarded to Wind Tre, with the case being suspended pending a ruling on the merits. In October of 2022, the Milan Court of Appeals issued a ruling in favour of Wind Tre overturning the outcome of the first instance ruling, stating that the application of 28-day billing by Wind Tre was legi-

time until 22/6/2017, or rather the date upon which AGCOM resolution 121/17/CONS entered into force, as there was no legal provision requiring monthly billing prior to that time. Based on this ruling, therefore, AMC’s claims concerning the reimbursement requests for the application of 28-day billing from 2016 through 22/06/2017 were fully rejected. However, with regard to the period from June 2017 up until the entry into force of Law no. 172/2017, which corresponds to the date upon which Wind Tre ceased the disputed conduct, the Court suspended the appeal proceedings pending the conclusion of the case pending before the Council of State regarding the legitimacy of the aforementioned AGCOM resolution, deeming the relative outcome prejudicial to its own ruling. At the present time, therefore, Wind Tre is not required to comply with any of the provisions of the first instance ruling and, above all, has no obligation to send out the registered letters to its former customers.

**Value Added Services**

Wind Tre has taken several measures to remedy the illegal phenomenon of the non-compliant VAS service activations, to the point that, in July of 2020, it proposed to AGCOM the possibility of the default barring of its entire customer base (with the exception of Carrier Billing services, the activation of which already entails security requirements), and later noting the same position being taken by AGCOM with resolution no. 10/21/CONS. Wind Tre exited the VAS market in January of 2022 after having discovered incorrect management practices by the CSPs (Content Service Providers), which led AGCOM to initiate disciplinary proceedings against all the service providers. On 24 June 2021, at the conclusion of proceeding 13/20/DTC, AGCOM imposed a fine of € 812 thousand on Wind Tre with resolution 191/21/CONS. Wind Tre filed an appeal with the Regional Administrative Court (on 23 September 2021), which is still pending.

**Unilateral change of the contractual conditions with the inclusion of a clause for adjusting prices to Italy’s FOI consumer price index, as determined by ISTAT**

On 24 November 2022, an information campaign was launched aimed at notifying a portion of the customers of a unilateral change to the offer pursuant to art. 98 septies decies paragraph 5 of Legislative Decree no. 207/21, which will continue throughout 2023 for all active Wind Tre customers. For new customers, on the other hand, the new General Contract Conditions have already been in force, for both the fixed and mobile segments, since 21 November 2022. With this change, the Customer acknowledges and accepts that, starting in January of 2024, in the event of a positive annual change in Italy’s FOI consumer price index recorded by ISTAT in October of the previous year, Wind Tre shall have the right to increase the monthly price of the Service by a percentage amount equal to the variation of this index, or by at least 5% if this variation is lower than that percentage.

The adjustment, which will be applied within the first quarter of each year, does not give the Customer the right to withdraw from the Contract at no cost. In fact, the current economic situation and inflationary conditions have made the previously established costs of the offer no longer sustainable; therefore, in order to continue offering its Services at sustainable prices, Wind Tre has been forced to prepare to adjust its prices based on the national FOI consumer price index, as determined by ISTAT, in the event that this situation should persist. The application of this policy starting in January of 2024 makes it possible to adapt the operation to any binding indications of the Authority. In this regard, on April 11, 2023, AGCOM published a press release containing the notice of the imminent issue of a regulatory review-- to be submitted to public consultation-- on a variety of topics, including the regulation of the adjustment of the fee based on the consumer price index.

The press release reports that the inclusion in the contract of mechanisms for periodic adjustment to the consumer price index must be expressly accepted by the user. On the other hand, for contracts that already provide for an indexing mechanism, the fee increase will not be configured as a unilateral change to the contractual conditions and therefore will not give the user the right to withdraw from the contract without penalty. The application of the adjustment to the consumer price index can take place, in the first application, only after 12 months from the contractual adhesion and after prior publicity of the entity of the change in the fee.





## A responsible supply chain

GRI 2-6   GRI 308-1   GRI 414-1

Wind Tre is aware of the fact that it can only achieve its positive impact with everyone's contribution, including its suppliers. For this reason, the company has established an in-depth analysis system for the suppliers with which it collaborates. During the selection and qualification phase, **the suppliers are subjected to assessment by the company's integrated management system, which evaluates their ability to meet the necessary quality, environment, health and ethical requirements.** The minimum standard necessary to access the qualification is to apply the fundamental principles of SA8000; 100% of the suppliers in the Register must respond positively to the requirement, even in the absence of specific certification. Furthermore, particular attention is paid to any suppliers whose activities can have a potentially high environmental impact. The supply chain operators with which Wind Tre collaborates are often large international companies that provide infrastructure, equipment, network services, and software. **In 2022, Wind Tre had 603 qualified suppliers<sup>18</sup>.**

As part of the SA8000 Management System, in 2022 Wind Tre once again carried out audits on a sample of suppliers, administering an ad hoc questionnaire to analyse the following issues: social responsibility, environmental policies, occupational health and safety, quality, and information security.

This analysis did not reveal any significant discrepancies with respect to the SA8000 Standard. The activity was an opportunity to raise the suppliers' awareness of issues functional to effective compliance with the standard, such as the dissemination of the Disciplinary Code and the adoption of the Code of Ethics.

In July of 2022, Wind Tre also decided to partner with CRIF Group to verify the sustainability criteria of its suppliers using a global digital Platform designed to collect and manage ESG information.

The process requires the suppliers in the Wind Tre Register to visit the platform and fill out a **questionnaire indicating the actions they have taken to meet the ESG principles** in 5 main areas (Business, Environmental, Social, Governance, Sector), each of which includes subsections with specific contents. The system calculates each supplier's ESG score, and the process is repeated again after 12 months.

During 2022, during an important tender for the purchase of radio links, the introduction of energy efficiency requirements was also tested as a parameter for the selection and remuneration of technology suppliers. This represented a concrete step towards the adoption of Green Procurement parameters.



**100%**  
The percentage of suppliers who must answer positively to the requirements from the SA8000

Suppliers	2022	2021	2020	2019
Qualified suppliers (no.)	603	631	891	736
Qualified suppliers located in Italy (no.)	561	592	827	660
Active suppliers (no.)	603	631	891	736
Amount ordered (in millions of €)	1,421	2,187	1,830	2,174

Disputes with suppliers (n.)	2022	2021	2020	2019
Number of disputes with suppliers	2	3	4	5

<sup>18</sup> 100% of new suppliers were evaluated using environmental and social criteria



# The Integrated Management System

Wind Tre has adopted an **integrated Management System** that engages all the company departments in the areas that are central to the company's performance, in order to guarantee the quality of products and services, the protection of the environment and the workers, social responsibility, and information security. The aim is to guide and monitor the company's performance by applying the continuous improvement principle typical of Total Quality Management schemes.



During the course of 2022, Wind Tre expanded its Integrated Management System by obtaining **two new certifications** (ISO 50001 which certifies the company's commitment to better energy use, and ISO 14064-1, for the greenhouse gas emissions). The company also obtained the three-year renewal of its Social Responsibility certificate (SA8000: 2014).

The attainment of the two new certifications attests to the company's increasing focus on reducing its environmental impact, both through the more efficient use of **energy resources** and through the increasingly precise and certified measurement of its impact in terms of **CO<sub>2</sub> emissions**.

Wind Tre's Integrated System therefore currently consists of eight certifications:

- **Quality:** ISO 9001:2015
- **Environmental Management:** ISO 14001: 2015
- **Occupational health and safety::** ISO 45001:2018
- **Corporate social responsibility:** SA8000:2014
- **Information Security:** **Cloud Services** | ISO 27001:2013 (provision of the following services: Cloud (IAAS) Housing and physical security of the supporting Data Centres; Cloud (SAAS) Back up protection and Disaster Recovery; with the use of the ISO/IEC 27017: 2015 and ISO/IEC 27018: 2019 guidelines)
- **Information Security:** **Security Operations Centre** | ISO 27001:2013 (provision of Security Management services and management of the Security Operations Centre)
- **Energy Management:** ISO 50001: 2018
- **Greenhouse gas emissions:** ISO 14064-1: 2018

The Quality, Environment, Worker Health and Safety, Energy, Greenhouse Gas emissions, and Social Responsibility certifications cover all the Wind Tre office locations<sup>19</sup>, while the Information Security certifications only cover the Data Centres where the specific services are provided.

<sup>19</sup> The Integrated Management System certifications are exclusively attributable to the company Wind Tre S.p.A.

For 2023, the company has set itself the goal of obtaining Business Continuity certification (ISO 22301, for the Cloud service Data Centres), with the creation of a dedicated inter-departmental team.

## The EcoVadis rating has increased for the second consecutive year

ecovadis

Wind Tre is increasingly committed to providing its customers and partners with information on initiatives, objectives, and results achieved in the 3 areas of ESG (Environment, Social, and Governance).

For this reason, the company is also part of the EcoVadis network, a worldwide provider of Business Sustainability assessments. The Ecovadis assessment focuses on four ESG areas: environment, Labour and Human Rights, ethics, and sustainable procurement.

For 2022, EcoVadis awarded Wind Tre with a **28.8% increase in its rating** with respect to the previous year. Wind Tre's score is greater than the average of the 234 TELCO companies analysed by the rating, and this is due to the goals it has achieved, as well as the medium/long-term objectives that the company has set for itself within the context of its ESG Plan.



**+28.8%**  
In the last year Wind Tre has further improved compared to 2021 its own rating in EcoVadis, one of the biggest network in the world for the evaluation of corporate sustainability







# CHILD PROTECTION IN THE DIGITAL DOMAIN

The effects of the pandemic have accelerated the adoption of digital technologies. The increased use of technology to work, play, and stay connected with the world has given rise to new digital habits.

The digital environment has become the place where young people spend most of their time, sharing ideas, and interacting with other kids. However, this increase in digital interaction has had major repercussions for younger children, who report an **increased sense of loneliness**.

**Kids are frequently left on their own with internet connected devices, without adult supervision:** 6 out of 10, elementary, middle school and high school students claim to use an Internet connected device on their own<sup>20</sup>. **The well-being of children online is one of the European Union's priorities**, which, thanks to the Better Internet for Kids strategy, is co-funding Safer Internet Centres (SICs)

throughout Europe, organising awareness campaigns, providing training to families and schools, and managing telephone support services to answer questions about how to react to dangerous situations, such as the online soliciting of children<sup>21</sup>.

In an increasingly connected world, where the boundary between the physical and digital dimensions is disappearing, how we manage our first approaches to the web and our digital identity are becoming issues of fundamental importance. Starting with the first times that we access the Internet, it is essential to create **a digital environment that's as welcoming and as safe as possible**. This requires an effort on the part of the institutions, as well as by companies, in order to ensure that users are provided with clear and effective tools to safely engage with the digital world, and to protect themselves against cyberbullying, and hate speech.

<sup>20</sup> Istituto Piepoli-MOIGE: Amid digital technologies and cyber risks: risks and opportunities of the web, 2022  
<sup>21</sup> European Commission: Better Internet for Kids, 2021

+34%

The increase in the use of smartphones among Italian children 6 to 10 years of age in 2021  
(Istituto Piepoli, 2022)

41%

Italian children 6 to 10 years of age who spend one to three hours a day on the Internet (47% for children 11 to 14 years of age)  
(Istituto Piepoli, 2022)



6 ON 10

The ratio of young people who report feeling unsafe online, 61% are girls  
(Osservatorio Indifesa, 2020)

## What it means to us



Protecting the most vulnerable users, such as children, by promoting and providing a welcoming and safe digital network, and by raising awareness of the concept of digital responsibility among stakeholders.



Establishing a dialogue with teachers and parents in order to raise awareness of digital safety issues, and to provide them with the tools needed to face them together with their students/children.



Providing younger users with the tools needed to learn how to browse the Internet in a safe and conscientious manner, to recognise and protect themselves against false information and violence, and to avoid online threats and potentially harmful situations in general.

Our ESG goals



FAMILIES 100% AWARE  
by 2025

“We want to raise awareness among families regarding the safe and responsible use of technology, starting with minors”



TOMMASO VITALI  
Sustainability Ambassador  
Head of B2C Marketing & New Business

COURSES OF ACTION

- Improvement of the NeoConnessi project through the involvement of a greater number of schools and the enrichment of the offering with new teaching and training tools
- Communication campaigns aimed at **raising awareness** on the issue of digital responsibility
- Development and dissemination of **digital security solutions** for the protection of smartphones and devices designed for fixed connectivity
- Development and dissemination of solutions designed to allow parents to **monitor and protect their children**

THE POINT WE'RE AT

- NeoConnessi:** over 14,000 primary school 4th and 5th grade classes involved throughout Italy, for a total of 800,000 children reached since the project was launched
- The launch of CodyMaze, the NeoConnessi educational game designed to teach children the theoretical foundations of computer programming and computational thinking
- Involvement and awareness of around 16,000 children in a virtual school trip to the city of Pisa on the occasion of Safer Internet Day
- The NeoConnessi project receives the 2022 CEOfor life award
- Launch of #offlinefordad, an inviting awareness campaign on digital responsibility issues to put down your smartphone to spend some time with your loved ones

The NeoConnessi project

The Internet and social media are now an integral part of young people’s daily lives, because they offer countless resources for learning, as well as for participation and creativity, but at the same time pose lots of new challenges. The pandemic and the relative school and business closures accelerated the phenomenon, leading more and more young people to engage with the digital world for the first time in order to maintain relations with their teachers and friends, and exposing them to the concrete risks that can arise from the improper use of these tools.

Launched by Wind Tre in 2018, since its first edition the NeoConnessi project has involved over 800,000 families in a common consideration among the three main players in the educational process (children, teachers, and families), all of whom share the same intentions regarding the safe and responsible use of the Internet and digital technologies.

The 2021/2022 edition of the project reached approximately 7,000 schools, engaging with over 14,000 primary school 4th and 5th grade classes throughout Italy, offering a series of stimulating new tools to guide children on their discover of the digital world, and to help them develop responsible behaviour. One of these new tools is the book **Nati Digital**, a modern fairytale created in collaboration with the Italian State Police, which tackles the key topics addressed by the NeoConnessi project using language that children can understand: responsibility and digital identity, cyberbullying, and internet security. The reading and subsequent discussion of the story in the classroom and within the family is intended to provide food for thought, in order to stimulate digital awareness.

For the teaching staff, who play a key educational role, Wind Tre has also arranged for a **free training course** to be provided by La Fabbri-ca, a leader in the field of education and in the development of educational and training com-

munication programmes for young people and families, attended by over 4,200 teachers. This course is recognised by the Ministry of Education, Universities and Research for the purposes of in-service training pursuant to the Ministerial Decree no. 170 of 21 March 2016.

In 2022, the NeoConnessi project was also introduced to the schools in the small Italian villages involved in the “Borghi Connessi” project, the aim of which is to help the villages grow through connectivity and the use of smart technologies.

As with the previous editions, the project will render available the NeoConnessi.it platform, which offers additional educational resources and interdisciplinary activities for teachers and parents. The Facebook Group NeoConnessi – Parents, Children and Internet also remains active, offering an increasingly



Prevention and awareness on issues such as safety and responsible use of the network, represent a daily commitment of the State Police and collaboration with Companies like Wind Tre it is absolutely decisive. Today the infinite potential offered by the Internet is evident to all and the risks are equally known, even serious ones, which often result from it. With the spread of the culture of safety, the Postal Police has become a reference point over time for all Internet users, who closely follow our initiatives and support our daily action for a safer web.



Postal Police

MARCO VALERIO CERVELLINI  
POSTAL POLICE

NeoConnessi classes and pupils involved	S.Y. 2021-22	S.Y. 2020-21	S.Y. 2019-20	S.Y. 2018-19
No. of classes involved	14,052	5,140	digital edition	3,750
No. of pupils involved <sup>22</sup>	351,300	128,500	93,750	93,750

<sup>22</sup> Data calculated by multiplying the number of classes involved by an average number of 25 pupils per class, in accordance with the indications provided by the Ministry of Education, Universities and Research for the 2021/22 school year





NEOCONNESSI  
CODYMAZE

The edugame launched to teach children the theoretical foundations of computer programming

wide range of content, and providing parents with a community of users with whom they can discuss the project's key topics. In 2022, the **NeoConnessi CodyMaze** educational game was launched, which is designed to teach children the theoretical foundations of computer programming and computational thinking, and to provide them the basic knowledge necessary to become "conscientious internet users". This educational game has been custom built based on NeoConnessi themes, and consists of a virtual maze in the real world. It's a chessboard of 25 squares, between which the children can move by learning to speak the Robots' language, and by answering various questions about the safe and conscientious use of digital technologies. The game was introduced on **Safer Internet Day 2022**, during a virtual trip to Pisa, with 16,000 children and teachers connecting to take part in the NeoConnessi game. The virtual trip is to all intents and purposes a school trip, an educational trip, which makes use of commonly used digital technologies to bridge physical distances without mobility. It is an effective anticipation of traditional travel, and allows you to get to know and appreciate online places and territories to visit again in order to recognize them, experience them and find them familiar. In March of 2022, at the CEOforLIFE-ECI United Arab Emirates & Global Awards, the CEO

of Wind Tre at the time, Jeffrey Hedberg, was recognised for having set 'new standards of excellence' in sustainability projects with the NecoConnessi project, and for his commitment to developing projects aimed at benefiting the environment and society. The **NeoConnessi project** was recognised for Wind Tre's commitment to digital responsibility and for the leading role it plays in the fight for a more inclusive, responsible, and connected future. Furthermore, in order to help the elderly become more familiar with technology, in 2021 Wind Tre decided to extend the NeoConnessi project by making a section of the portal available to people Over 60: NeoConnessi Silver. Since Wind Tre is a major provider of Internet access, the company feels responsible for keeping people safe online. In an increasingly online world, it is essential to raise young people's awareness of the potential risks posed by the Internet, and to teach them how to use technology in a well-informed and positive manner. This is another reason why the company intends to continue focusing on the project, and at the beginning of 2023 it launched the **NeoConnessi Ten Commandments - 10 rules for family protection and awareness online**. The "Ten Commandments" are intended to provide adults with useful advice for teaching children about digital technologies, ensuring a

safe and positive online experience, reiterating the responsibility that everyone bears for encouraging respectful online behaviour, and for making the Internet a safer place for children, while at the same time facilitating their freedom to experience the digital world.

Ensuring online protection

Ensuring a safe online experience is one of Wind Tre's fundamental values, and is one of the ways in which we constantly strive be "much closer" to our customers. From this perspective, the company's objective is to offer solutions dedicated to the safety of the devices used by the entire family.

- protection is activated immediately once the option is activated;
- report of threats blocked on Wind Tre app ;
- safe browsing on all networks;
- antivirus with malware scanning;
- password and account security check;
- blockage of advertising banners and tracking cookies.

The **Wind Tre Family Protect** Parental Control app is dedicated to the Under 14 target. Once the app has been installed on both the parents' and the children's phones, the parents are able to monitor the amount of time their children spend on their phones, enable parental controls where they see fit, and check their children's exact locations. In addition, parents can also receive text messages and notifications about their children's online activities. Up to 10 devices, including smartphones and tablets, can be protected.

Both services are also available for Business Customers with VAT numbers.

In November of 2022, thanks to the **Più Sicuri Mobile** and **Più Sicuri Mobile Pro** services, Wind Tre enriched its range of security apps. These services are designed to protect smartphones against online risks through various functions:

The Home Protect service was also launched in June of 2022 (and was renamed **Più Sicuri Casa & Ufficio** in January of 2023). The service is designed for home networks, in order to ensure a safe online experience for those who use the internet from home. Thanks to this service, all devices connected to the fixed Wi-Fi network are also protected while browsing. The new service's features include fixed network security, with protection against risks like viruses, malware and harmful links, and protection of all devices connected to the home network (PCs, tablets, Smartphones, Smart TVs and IoT devices) while browsing.

- warning page on the Wind Tre network when attempting to access malicious websites;



## Parole O\_Stili

Since 2020, Wind Tre has been a signatory of the **Non-Hostile Communication Manifesto** drawn up by the non-profit association Parole O\_Stili (<https://paroleostili.it/>).

This charter lists **ten principles to improve the**

**communication and behaviour of people who use the internet.** The Non-hostile Communication Manifesto is a commitment of shared responsibility: it is intended to encourage respectful and civil behaviour, and make the Internet a welcoming and safe place for all.



### The Manifesto of Non-Hostile Communication

**1. Virtual is real**  
*On the Internet, I only write or say what I would dare to say in person.*

**2. You are what you communicate**  
*The words I choose define who I am. They represent me.*

**3. Words shape the way I think**  
*I take all the time I need to express my views in the best possible way.*

**4. Listen before you speak**  
*No one can always be right, and nor am I. I listen, with an honest and open-minded attitude.*

**5. Words are bridges**  
*I choose words to understand, make myself understood and get close to others.*

**6. Words have consequences**  
*I am aware that what I say or write can have consequences, small or serious.*

**7. Share with care**  
*I share texts and image only after I have read, assessed and understood them.*

**8. Ideas can be discussed. People must be respected**  
*Those whose views and opinions differ from mine are not enemies to be destroyed.*

**9. An insult is not an argument**  
*I accept no offensive and aggressive words, even if they support my point of view.*

**10. Silence says something too**  
*When it's better to keep quiet... I do.*

### THE #OFFLINEFORDAD INITIATIVE

For **Father's Day** 2022, Wind Tre launched an **invitation for everyone to turn off their smartphones and spend some time with their loved ones.**

By focusing on closeness and interpersonal connections, namely those between fathers and their children, the video reaffirms one of Wind Tre's fundamental values, that of digital responsibility, showing that there are times when we need to disconnect from our devices in order to truly connect with the people we love

Wind Tre promoted the **#offlinefordad** initiative, even engaging with a group of influencers, who stayed off the internet and social media on Father's Day to spend some quality time with their fathers.



WATCH THE VIDEO







# CYBERSECURITY AND PRIVACY

GRI 3-3

In the current geopolitical scenario, cybersecurity has come to play an even more central role with respect to previous years. In light of the ongoing conflicts around the globe, the incredible extent to which we use the Internet every day **exposes all citizens and businesses to increasingly frequent cyber-attacks**, with potentially serious economic consequences and impacts on our daily lives, even in terms of personal data security.

The scope of these threats has also led to a heightened awareness of cybersecurity issues by businesses. Not just by ICT managers, but also by company leaders, who have begun allocating additional resources to cybersecurity. **This trend led the Italian cybersecurity market to grow by 18% in 2022 with respect to 2021, reaching a value of €1.86 billion.**

In addition to technological investments, the cybersecurity crisis has emphasised the need to educate and train people within organisations about the risks associated with cyber threats, and to have specialised personnel to deal with the most critical attacks.

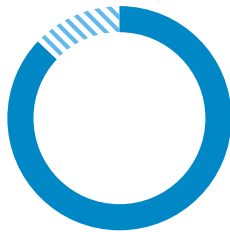
This ranges from simple awareness of increasingly common phenomena, such as phishing, to best practices for protecting personal data online, and the provision of courses on the safe and correct use technology for the employees of companies and institutions. This know-how is increasingly being conveyed by organisations to citizens, especially the most vulnerable segments of society, such as minors and senior citizens, with the **awareness that the current situation of interconnectivity requires considerable caution and protection.**

+138%

The percentage by which attacks on critical infrastructure in Italy increased in 2022 with respect to the previous year  
*(Polizia Postale, 2023)*

86%

The percentage of global business leaders who believe that geopolitical instability will lead to a catastrophic cyber event within the next two years  
*(Wef Global Cybersecurity Outlook, 2023)*



€1.86 BILLION

The value of the Italian cybersecurity market in 2022, +18% compared to 2021  
*(Osservatorio Politecnico Milano, 2023)*

In this scenario, telecommunications service providers continue to play an essential role, as they represent the gateway to the web for families and businesses, and are stewards of vast amounts of sensitive data and information. This responsibility requires a great deal of attention, both in terms of innovation, with the **adoption of increasingly advanced and secure**

**technologies and infrastructures**, as well as in terms of knowledge, through the **continuous and rigorous training of one's own personnel**. This is the only way that can telco companies can guarantee the necessary levels of cyber risk security and awareness, and become promoters of the most effective best practices.

## What it means to us



Investing in a cybersecurity infrastructure to protect customers' data.



Offering services designed to help client companies securely handle the digital evolution of their businesses.



Preventing possible loss or damage of the data managed, and limiting the damage and restoring normal business operations as quickly as possible if any incidents do occur.



Implementing the latest regulations and maintaining a constant dialogue with the authorities in order to establish and update the best privacy protection standards in the field of telecommunications.



Disseminating a Cybersecurity Mindset throughout the company in order to prevent human error.

Our ESG goals



COMPANIES 100% SECURE  
by 2025



FABIO PICCINI  
Sustainability  
Ambassador

Head of Technology  
Infrastructures & Systems

“We want to protect our business  
customers with our cybersecurity  
and data protection solutions”

COURSES OF ACTION

- Release of **security packages** for SMEs with dedicated firewall and anti-spam solutions, as well as vulnerability assessment and management
- Development of **self-assessment tools**, to analyse the customer’s security status and to identify the best solutions
- Implementation of an integrated infrastructure to provide customers with **active security services**
- Improvement of security awareness through **simulation and monitoring activities** aimed at highlighting vulnerabilities that can be exploited by an attacker

THE POINT WE’RE AT

- € 25 million invested in 2022 alone for improved network security, customer solutions, and the cloud transition
- Security by Design: improved risk prevention and mitigation processes
- Human Factor: staff training to develop a Cybersecurity Mindset
- Establishment of a Business Continuity framework to identify potential threats and improve resilience
- Numerous on-site checks on external privacy Managers
- Achievement of the objectives required for the release of security packages ahead of schedule

Increasingly resilient

GRI  
203-2

With the exponential increase in the amounts of data exchanged between companies and users interacting with digital infrastructures, the numbers of cyber attacks have also increased. Cybersecurity is at the centre of the debate between companies and regulatory authorities, and has led to the establishment of a regulatory framework for ensuring national security<sup>23</sup> and the resilience of critical infrastructures. Wind Tre’s collaboration with the institutional bodies responsible for cybersecurity therefore continued in 2022, as did the internal activities of reviewing the data and information security management framework and the development of processes and technical solutions to protect customer and Wind Tre data.

In 2022, Wind Tre’s direct investments in data and system security services and platforms amounted to approximately €25 million<sup>24</sup>, and focused on several main lines of development:

- **Network Security** – Wind Tre has integrated its platform distribution activities with various testing campaigns (Vulnerability Assessments/Penetration Tests), with the aim of bolstering the security safeguards in order to protect the network systems.
- **Service Continuity** – Wind Tre undertook several initiatives aimed at verifying the network’s resilience capabilities, in order to ensure optimal service continuity. Ensuring continuity primarily serves to strengthen the business, to provide assurances to customers, and to minimise the potential impacts of any faults or natural events, as well as to comply with the national regulations applicable to the sector.
- **Customer solutions** – The technologies, skills and processes developed by Wind Tre for the protection of its own business are being exploited to offer solutions and services capable of helping client companies securely handle the digital evolution of their businesses. In fact, thanks to the skills and technologies developed internal-

ly, Wind Tre is able to offer **dedicated IT security management services to its B2B customers**.

- **Cloud Transition** – Business processes are increasingly making use of cloud technologies. In order to facilitate the transition to these technologies and provide its customers with the highest levels of cybersecurity services, Wind Tre has decided to renovate its security infrastructure, placing maximum attention on the design, implementation and monitoring processes.

Throughout the year, **CyberIntelligence** has played an essential role in protecting the Wind Tre service infrastructure and preventing cyber threats, even by monitoring the alarm bulletins issued by national and international institutions. The main role in this area is played by the **Security Operations Centre (SOC)**, the Wind Tre operations centre that uses various monitoring and control systems to continuously prevent and neutralise threats in real-time, using advanced data analysis and process automation technologies.

As of March 2022, due to the change in the international context, Wind Tre **made its DDoS Mitigation service**, which protects against Distributed Denial of Service (DDoS) cyber attacks, **available to its Top and Large business clients free of charge for the first two months of activation**. These types of cyber attacks have become more frequent in relation to the conflict in Ukraine, with hackers intentionally sending large amounts of data to inhibit connections and block servers, thus preventing the affected customers from accessing Internet services.

In 2022 Wind Tre continued to **bolster its risk prevention and mitigation processes by implementing the principles of Security by Design**, which means envisaging security criteria proportionate to the level of exposure of the company’s and its customers’ data right from the initial requirement definition stages. These same principles are implemented throughout the supply chain, where specific security



DATA  
SECURITY

In 2022 alone the direct investments of Wind Tre in services and platforms for data security were equal to approx 25 million euros

<sup>23</sup> Law no. 133/2019 and subsequent Prime Ministerial Decrees.  
<sup>24</sup> Value referring to the sum of capitalized costs (Capex) and operating costs (Opex)



checklists are used to verify that the suppliers have also adopted specific data protection measures.

Finally, in 2022 Wind Tre entered into several **new major partnerships** to further enrich its IT security offering for large companies and the public administration. These include S2E|Solutions2Enterprises, an Italian consulting company operating in the ICT sector, and Cyberoo, the first and only Italian company to

have been named a Representative vendor in the “2021 Gartner Market Guide for Managed Detection & Response Services”. The latter has allowed Wind Tre BUSINESS to further improve the security levels of its customers’ corporate networks through the Managed Detection & Response (MDR) service, which includes the comprehensive monitoring of the internal networks, and the ongoing detection of any external threats, 24 hours a day, seven days a week.

Focus on awareness and learning

Digitisation has led to an increase in the number of cyberattacks suffered by companies. **The so-called H factor (Human Factor) is one of the main causes of security incidents**, however, and remains a major cybersecurity weakness for most companies.

That’s why it is important to disseminate a **Cybersecurity Mindset** throughout the company. This can be done by taking action on two levels: **awareness**, which leads people to become more aware of their own behaviour, and **learning**, in order to encourage the acquisition of new knowledge and the adoption of virtuous behaviours, in order to mitigate cyber threats and the inherent dangers associated with technology. In keeping with the Group’s guidelines, the current regulations, and the best practices, Wind Tre has carried out awareness-raising and training initiatives on cybersecurity issues for all of its staff.

By monitoring their changes and interacting with the competent authorities, Wind Tre constantly adjusts its processes to implement increasingly effective measures for preventing and responding to cybersecurity attacks, in full compliance with the national cybersecurity regulations.

To mitigate the new risk scenarios, an intelligence driven approach is most effective for reducing incident response times and, more generally, for keeping up-to-date on what’s happening within the national and international regulatory context.

For this reason, **Wind Tre also invests in Strategic Cyberthreat Intelligence activities**, which allow the teams involved in various capacities at the company to focus on the potential risks, and to anticipate them by identifying the potential threats and possible countermeasures, even involving third parties, in line with Wind Tre’s established security requirements.

Finally, in order to improve process resilience, Wind Tre has created a **Business Continuity framework**. Business Continuity can be understood as an organisation’s ability to continue delivering its products or services at acceptable predefined levels following any adverse events that may occur.

The framework’s continuous improvement allows potential threats to be identified, and simultaneously improves its resilience and ability to effectively respond to adverse events.

Personal data protection

GRI 418-1

The topics of privacy and data security are extremely important to Wind Tre, which, as a telecommunications operator, **manages an enormous amount of personal information regarding its customers**. Wind Tre is not only responsible for the customer data that it manages directly, but also all the information deriving from the business relationships that the company has with third parties who manage part of the commercial and service processes and who, consequently, need to process customer data in full regulatory legitimacy as data controllers.

The company has taken all the measures necessary to ensure the security of the data, as well as compliance with the latest privacy and cybersecurity legislation, in the interests of both the company itself and its customers. With regard to both the Italian and European legislative contexts, the company’s policy on privacy and data security is primarily aimed at **ensuring regulatory compliance**, taking into account the introduction of the General Data Protection Regulation (GDPR), approved in 2016 and effective since 2018, and the recent introduction of new cookie guidelines by Italy’s Data Protection Authority, after which Wind Tre updated its cookie policy. In the event that any accidents should occur, Wind Tre undertakes to prevent any potential loss or damage to the data managed, to limit the damage, and to restore normal business operations as soon as possible.

Thanks to the harmonisation processes conducted in recent years, Wind Tre has now implemented a **Governance, Risk Management and Compliance (eGRC) system, which allows it to monitor data processing throughout the entire supply chain**. Specific monitoring activities are periodically conducted with all the

company managers as part of maintaining the Log of Processing activities. This is complemented by a verification activity, which is carried out through a self-assessment system for all appointed data processors, using an **electronic dashboard** to quickly disseminate and process the self-assessment questionnaires sent out to all of Wind Tre’s partners through specific “Self Assessment” campaigns<sup>25</sup>.

During the course of the year, **the company paid greater attention to critical infrastructures, implementing new monitoring and verification processes** compliant with the national security regulations, and namely with the “Measures for ensuring the security and integrity of the electronic communications networks and the reporting of significant incidents” established in 2018 by the Ministry for Economic Development (now called the Ministry of Enterprises and Made in Italy – MIMIT). Wind Tre complies with the requirements of the Personal Data Protection Authority (GPDP) concerning proper data management in terms of authorisation for processing, profiling, data enrichment, and data transfers. The company maintains a fully cooperative relationship with the GPDP in order to determine the best standards for the telecommunications sector in terms of privacy protection.

Within the context of its responsibilities as Data Controller, Wind Tre has **increased 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. The inspections were conducted on site, in compliance with the emergency measures in place during the pandemic. Customer reports, including those received by the Authority, are also regularly answered.



GOVERNANCE RISK MANAGEMENT COMPLIANCE

System that allows to monitor the data processing throughout the supply chain

25 The 2022 Self Assessment Campaign concluded in February of 2023, with an extraordinary session being held from December 2022 - February 2023 in order to allow a greater number of appointed third-party data processors to complete the annual questionnaire. This extraordinary session was part of an education process carried out for the sales network (together with training on Privacy Compliance delivered through training modules), in order to raise awareness among our partners of the importance of the correct use of personal data processing

Inspections by the Data Protection Authority (no.)	2022	2021	2020	2019
Number of inspections	1	0	0	1

The inspection activity carried out by the Data Protection Authority on 10 and 11 October 2022 originated from reports received from customers regarding telemarketing/teleselling activities. This verification activity is not yet completed. The Company was asked to integrate with new documentation useful for the investigation in progress.

Privacy-related checks on suppliers (no.)*	2022	2021	2020	2019
On-site audits	296	67	13	8
Verification questionnaires administered to external suppliers	525	466	321	258
Verification questionnaires are sent to Wind Tre's sales agents and points of sale	4,955	4,884	6,017	6,527

\*(Including Suppliers, Agents, Agencies, Telesellers, and Dealers.)

In the interests of transparency, Wind Tre reports any events that could potentially result in a data breach to the Data Protection Authority. Only one case was formally reported for 2022<sup>26</sup>.

Data Breaches [GRI 418-1b]	2022	2021	2020	2019
Events detected by Wind Tre	2	4	3	7
Cases formally reported to Wind Tre by the Data Protection Authority	1	0	1	1



26 The company has not found any proven complaints for the reporting period (GRI 418-1a)

POTENTIAL DATA BREACHES REPORTED TO THE DATA PROTECTION AUTHORITY

The following Data Breaches were reported to the Data Protection Authority in 2020:

- **POS\_NG:** violation concerning unauthorised access to the POSNG system (a Wind Tre system used by authorised resellers to manage the sale of mobile and fixed network products and services to Consumers and MicroBusiness customers), carried out using the login credentials of a Wind Tre dealer (e.g. using search criteria, mobile phone numbers, or tax codes). The unauthorised accesses resulted in the viewing of personal data pertaining to Wind Tre Customers and Former Customers.
- **EGLUE:** Unauthorised access violations were revealed on a web tool developed and managed by the supplier eGlue, in its capacity as a Wind Tre Data Processor.
- **DATA MANAGEMENT:** following a report by a former employee, who claimed to have received two Wind Tre payslips intended for other employees, it was revealed that Data Management, in its capacity as a Wind Tre data processor tasked with producing and processing data relating to payslips and the sending of the same, had accidentally sent payslips to incorrect recipients due to human error.

The following Data Breaches were reported to the Data Protection Authority in 2021:

- **POS\_NG:** the same event that took place at the end of 2020 occurred at the start of 2021
- **Certified Email:** the CRM system's agent software sent communications regarding the PEC 1928 service to incorrect non-certified email addresses of 1461 Business and Consumer Clients (wrong recipients) due to a memory buffer overload. An investigation was immediately launched to identify any systems potentially affected by the anomaly. The Supervisory Authority formally notified the Company that it had closed the case regarding the reported data breach, having deemed that the security and remediation measures implemented immediately by Wind Tre were sufficient to have prevented any rights of the data subjects from being compromised.
- **The WINDTRE App:** During the ordinary operation of the systems and applications that provide the Customer Area service, it was revealed that several failures occurred during login operations via the mobile APP channel using login credentials (username and password). The password for the customer area was reset and an SMS notification was sent to the parties concerned. The Supervisory Authority formally notified the Company that it had closed the case regarding the reported data breach, having deemed that the security and remediation measures implemented immediately by Wind Tre were sufficient to have prevented any rights of the data subjects from being compromised.
- **ETHENETO03 SRL:** Wind Tre received a report from the DHL Supply Chain (the data processor appointed by Wind Tre for delivering products to customers) and from a third-party company's representative regarding SMS notifications for the delivery of products addressed to Wind Tre customers having been erroneous received by the third-party company. The Supervisory Authority formally notified the Company that it had closed the case regarding the reported data breach, having deemed that the security and remediation measures implemented immediately by Wind Tre were sufficient to have prevented any rights of the data subjects from being compromised.

The following Data Breaches were reported to the Data Protection Authority in 2022:

- **JUDICIAL SYSTEMS:** the company's endpoint detection and response (EDR) system notified the Security Operation Centre that there had been an unusual attempt to connect to the Wind Tre Data Centre. As soon as the notification was received, the Technology Information Security department launched a technical analysis to verify whether a possible



unauthorised intrusion had occurred. The necessary countermeasures were immediately implemented, and the attack was neutralised on the same date. In light of the confidential nature of the system dedicated to the provision of the Mandatory Services, Wind Tre limited itself to viewing the inputs alone, and left the computer systems unaltered for subsequent investigations by the Judicial Authorities. The investigations are still ongoing, but no activities are able to be carried out.

- **NETWORK CONTACTS SRL:** a company designated as one of our external data processors pursuant to art. 28 of the GDPR notified us that their systems had suffered a data breach as a result of a cyber attack. The event does not appear to have resulted in the breach of personal data owned by Wind Tre S.p.A., and the supplier says that analyses are still underway to determine the extent of the impact on the personal data belonging to Wind Tre S.p.A. data subjects. The Data Protection Authority concluded the case with the determination that the breach occurred at Network Contacts. The case will also likely be closed for Wind Tre since the breach took place on the provider's systems.



## “Please Don’t Call” protects customers from unwanted calls

The protection of connections and digital life falls within the scope of “digital responsibility,” an area upon which Wind Tre has decided to focus its efforts. With the desire to **help its customers protect themselves from unwanted calls**, the company has developed “Please Don’t Call,” a **simple and entirely free** service for consumer customers that can be enabled via the WINDTRE App, and allows potential unwanted incoming calls to be screened beforehand, thus allowing the customer to choose whether or not to answer.

The service’s launch, which took place in July of 2022, was announced with an innovative and viral advertising campaign, which received an award in the Outsider category at the **Touchpoint Awards\Strategy 2022**, and in the “Web and Mobile Spot” category at the **54th Key Award and 9th Radio Key Award**. The creative concept was aimed at communi-

cating the Please Don’t Call function using a storytelling style that focused upon the protective role that the service plays, especially at delicate times, during relaxation, or while working, in keeping with the value of closeness expressed by the company’s purpose.

Wind Tre is constantly working to keep the database up to date, also thanks to customer reports. In fact, if a customer receives a call from a potentially suspicious and unidentified number, he/she can report it directly within the app, by following a guided procedure. Conversely, if a number has been mistakenly reported as a potential unwanted call, the customer can report this.

**The service is also available for Business Customers with VAT numbers.** As of the end of December 2022, about 850,000 customers had enabled the service at used it least once.



SCAN THE QR CODE TO WATCH THE VIDEO





# CLOSER TO OUR CUSTOMERS

The “customer experience” has taken on an increasingly central role in the life of companies. It is a cornerstone of the business, upon which a company’s success partly depends. It represents the **relationship that the customer has with the company**, not only in terms of purchasing, but in terms of all of their interactions with the brand, including contacts with customer care services, and all the other company touchpoints.

According to a recent Ipsos study<sup>27</sup>, **in order to improve their relationships with customers and reduce the risk of so-called abandonment, brands must always keep their promises**. If there is a certain gap between what a company promises to do and what it actually does, the customer’s expectations are not met, thus causing their relationship with the brand itself to deteriorate.

In order to create a positive and lasting impression, **brands must pay close attention** to the customer experience and the impact that it has

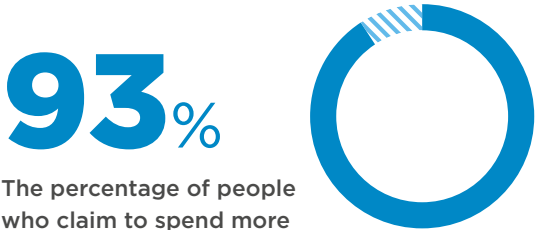
on the customers’ relationship with the brand. This strategy is crucial, also because consumer **expectations are increasing**, and are becoming more fluid in relation to various categories of products and services.

A company that establishes strong, solid, and lasting relationships with its customers can have a strong impact on consumer choices and trust<sup>28</sup>. The stronger the relationship, the more a consumer will promote that brand, perhaps even forgiving it in the event of a negative experience. According to KPMG analysts<sup>29</sup>, now more than ever, customers expect personalised experiences (tailored offers, content, and products), transparent communications (prices, conditions, and service modifications), efficient deliveries (fast deliveries, and real-time information), and immediate satisfaction. There is no doubt that the customer experience represents the new competitive arena and **the main element of distinction for companies**, to the point that it has even surpassed the structural characteristics of the product, such as quality

27 IPSOS: Market Research, Brand CX Forces: The impact of Customer Experience on brand growth, 2022  
28 INGO GROUP: The impact of the customer experience on brand growth, 2022  
29 KPMG: Excellence in the Customer Experience: omni-channel presence, phygitality, and personalisation, 2022



The percentage of consumers who consider the experience offered by the brand to be a determining factor in their purchasing decision  
(Lezco, 2022)



The percentage of people who claim to spend more with companies that personalise their customer services  
(Gitnux, 2022)



The telecommunications sector’s ranking in Italy’s classification of Customer Experience Excellence  
(KMPG, 2022)

and price, in terms of importance. The aspects of the brand and customer experience must become increasingly interconnected. In order to stand out and have a real competitive advantage, companies must offer experiences that go far beyond the simple transaction,

especially in the global arena, where customer expectations are constantly evolving and competition is constantly growing. **Creating strong bonds** and ensuring a good customer experience is the most effective way to retain customers and gain new ones.

## What it means to us



Offering an outstanding customer experience to enhance its customer relations while guaranteeing excellent reliability and transparency.



Offering customers a unique experience through multiple contact channels.



Being ready to constantly improve the services offered to customers, even by promoting an attentive dialogue with the consumer associations.



Being aware of one’s role within the community, and improving one’s ability to listen to people in order to understand and meet their needs.



Communication channels

Today, customers have numerous ways of getting in touch with companies, and have become increasingly demanding, expecting customer service that will promptly meet their needs and resolve their problems.

**The quality of a telecommunications service isn't just limited to the purchasing phase,** but depends on the dialogue that is able to be established with the customer throughout each stage of the relationship: prior to a purchase, during the finalisation of the business agreement, while the supply relationship is in progress, when any problems arise or the communication needs and habits change, and all the way up to the conclusion of the contractual relationship.

The **main goal of Wind Tre's Customer Care is to offer the customer an experience that's as simple and uniform as possible**, based on the information requested and the assistance received, through the various contact channels. In pursuit of these objectives, in 2022 Wind Tre continued launching information campaigns and deployment activities conveyed through Artificial Intelligence, focusing not only on the technical tools and the accuracy of the information, but also on the Customer Experience provided through the Artificial Intelligence. In 2022, the asynchronous chat channel was further consolidated, and enjoyed a stable number of interactions from customers. On the contrary, the digital assistant recorded greater penetration, handling 78% of incoming chats

(+25% compared to 2021), with a subsequent contact from the customer in about 90% of cases, in line with the previous year.

In 2022, Wind Tre had 17 call centres dedicated to customer support, of which 6 dedicated to both Consumer and Business customers, 10 dedicated exclusively to Consumer customers, and 1 dedicated exclusively to Business customers.

Very Mobile, another brand belonging to CK Hutchison Holdings Ltd. group, to which Wind Tre also belongs, also has a dedicated customer service number (1929).

Aware of the fact that the trust afforded by customers and the establishment of good relationships with them is beneficial to the company's growth and development, Wind Tre pays special attention to its customer relations.

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. The goal is to offer customers a positive experience that's consistent in terms of the information and assistance provided through the multiple contact channels and the high number of contacts and requests received, adopting a holistic approach, in order to ensure that the customer feels heard, and receives fast, efficient, and courteous support.

Loyalty and satisfaction		2022	2021	2020	2019	2018
Contact by telephone (no.)	Business	1,552,258	1,290,131	1,351,045	1,531,256	1,829,907
	Consumer	14,166,965	17,286,278	20,863,116	26,925,442	36,424,497
	Total	15,719,223	18,576,409	22,214,161	28,456,698	38,254,404
Support requests received by the specialised technical assistance groups (no.)	Business	472,796	311,625	313,891	348,053	348,487
	Consumer	2,238,046	2,647,223	3,022,218	3,452,840	4,377,023
	Total	2,710,842	2,958,848	3,336,109	3,800,893	4,725,510

Customer satisfaction

In 2022, Wind Tre once again measured its customers' satisfaction on a scale of 10 to 100 through market-specific (fixed, mobile, consumer and business) telephone interviews carried out by an independent external company on a representative sample of customers.

With regard to Mobile Consumer customers, which constitute the most representative market segment in terms of number of customers and revenue, the survey was conducted quarterly, with 1,400 interviews carried out, and with a representative sample being used for every geographical area, contract type (pre-paid or subscription), nationality, data usage

method, and length of contract. The overall results showed a **customer loyalty of 83.2 for Wind Tre customers** and 91.2 for Very Mobile<sup>30</sup> customers, with an **overall satisfaction of 79** for Wind Tre and 86.3 for Very Mobile.

The results are also influenced by contextual situations that can have certain negative trends, which the management seeks to remedy through recovery activities. In particular, the overall satisfaction indicator is stable despite these fluctuations, which are independent of the strategies implemented by the company.

Results of the Mobile Consumer Customer Satisfaction analyses (Scale from 10-100)	WINDTRE				
	2022	2021	2020	2019	2018
Overall satisfaction	79	81	79.7	77.8	79.2
Rates	76.9	80.2	79.4	76.1	78.3
Customer Value Management	70.1	70.1	73.1	70.1	75.2
Customer Care Services	65.1	67.8	72.7	75.8	76.5
IVR - Interactive Voice Response	65.6	68	68.1	73.5	72.5
Call Centre operator	68.6	71.6	77.7	79	79.5
Customer loyalty	83.2	86.2	85.1	82.4	83.6
Tendency for "word of mouth" recommendations	80.1	80.6	78.6	77.9	80.1
Advertising effectiveness	79.8	79.5	80.6	80.5	80.1

Results of the Mobile Consumer Customer Satisfaction analyses (Scale from 10-100)	VERY MOBILE		
	2022	2021	2020
Overall satisfaction	86.3	85.9	88.2
Rates	87.8	89.6	92
Customer Value Management	81.2	88.7	84.5
Customer Care Services	79.7	78	81.5
IVR - Interactive Voice Response	81.9	75.8	75.5
Call Centre operator	76.9	79	83.3
Customer loyalty	91.2	90.3	93.6
Tendency for "word of mouth" recommendations	89.2	85.7	88.3
Advertising effectiveness	84.7	83.7	86

30 Very Mobile is a brand of the CK Hutchison Holdings Ltd. group which Wind Tre also belongs to, and which is totally managed by Wind Tre, is for this reason considered in the reporting



**LOYALTY AND SATISFACTION**  
83.2, on a scale of 10-100, the Loyalty of Wind Tre's customer; 79 the overall satisfaction

Reputation analysis

Reputation can be understood as an emotional bond that's based on respect and trust in a brand, and is an important factor for predicting support from many different categories of stakeholders. It is influenced by factors that not only concern the product/service itself, but also the company's identity, governance, employee management, and behaviour within the community. For this reason, **it is also an important parameter for measuring the effectiveness of ESG policies.** In 2022, Wind Tre measured its reputation regularly through surveys conducted by a specialised outside company. The surveys are based on interviews carried out with significant samples of the Italian population consisting of both customers and non-cu-

stomers. The results are discussed in quarterly meetings, which, due to the transversal nature of the topic, are attended by representatives from various areas of the company. Although influenced by many general context factors, and conducted in a sector that's extremely sensitive to price dynamics, the 2022 surveys demonstrated the strategic role that sustainability and transparency issues can play in the construction and differentiation of a company's reputation. Some of the activities implemented, such as the ESG plan in its entirety, or even the Neo-Connessi or Please don't Call projects, are a demonstration of this, and constitute excellent references for the future.

Informed and safe

Always attentive to its customers' digital security, several years ago Wind Tre launched its "Informati e Sicuri" service. This is a toll-free number (800 900 134) dedicated to safe surfing, where customers can report issues related to Value Added Services

(VAS) and cybersecurity to Customer Care operators. The initiative was created with the aim of being **increasingly close to our customers**, so that they can enjoy an efficient browsing experience without fear of any nasty surprises.



The pursuit of shared solutions

GRI 2-25

In the event of a customer dispute, Wind Tre uses two mediation tools to reduce recourse to the courts: **attempted mediation**, provided by the Communications Authority (AGCOM), with the support of a third party (Co.re.com. - Comitati regionali per le comunicazioni, and CCIAAs - Chambers of Commerce, Industry, Agriculture and Crafts) and the **Alternative Dispute Resolution procedure** carried out by consumer

associations registered with the Consiglio Nazionale dei Consumatori e degli Utenti (CNCU). The mediation is managed online with a dedicated website. As shown in the following tables, both tools have had positive trends in resolving disputes over the years, with an increase in agreed solutions and claims managed with positive outcomes for Wind Tre.

Mediation proceedings/Disputes handled before Corecom/AGCom/CCIAAs		2022	2021	2020	2019	2018
Mediation requests submitted to the Co.re.coms (reference year)		11,768	16,980	23,035	26,408	28,098
Solution agreed upon between the parties (% volumes handled during the reference year)		84%	80%	81%	80%	79%
User request for the Authority or the Co.Re.Coms to resolve the dispute (% volumes managed during the reference year)	n.	1,434	2,103	2,552	2,175	3,027
	%	12%	12%	11%	8%	11%
User request for the Authority or the Co.Re.Coms to adopt an urgent measure (reference year)	n.	1,460	2,431	2,752	2,481	2,828
	%	12%	14%	12%	9%	11%
Total		14,662	21,514	28,339	32,263	32,754

Consumer Association Complaints and Joint mediation requests <sup>31</sup>		2022	2021	2020	2019	2018
Complaints from Consumer Associations (no.)		4,543	5,178	6,070	7,032	7,056
Joint mediation requests (no.)		2,459	3,125	3,667	4,204	3,764
Claims managed (no.)		2,606	3,115	3,671	4,011	3,723
Claims with a positive outcome	no.	2,442	2,928	3,465	3,482	3,751
Claims with a positive outcome	%	94%	94%	94%	94%	94%

Litigations with customers		2022	2021	2020	2019	2018
Pending as of 31/12		11,308	13,530	13,339	13,206	12,131
Favourable outcomes (%)		76%	75%	72%	68%	66%

31 The submission of the complaint through the association is a requirement for the submission of the joint mediation request



## Dialogue with Consumer Associations



**COOPERATION  
PROTOCOL**

Signed with the main consumers associations in 2021, the protocol entailed the development of 4 areas of interest

The year 2022 saw a great deal of dialogue with the main consumer associations at the national level, namely with Adiconsum, Adoc, Altroconsumo, Cittadinanzattiva, Federconsumatori, and U.Di.Con., which had committed to a cooperation protocol with Wind Tre signed in 2021. The schedule of activities envisaged in the protocol involved the in-depth study of 4 areas of interest: **Welcome to Wind Tre, Sustainability, Transparency, and Dissemination**, with a schedule of about 20 meetings, which serve as important occasions for dialogue and sharing ideas. Overall, the activities entailed about **250 hours** of reciprocal interactions, including conference calls, and various meetings both inside and outside the company.

In particular, within the context of the “**Welcome to Wind Tre**” initiative, awareness of the new corporate structure created following the merger was promoted, with the dissemination of the spirit of the corporate purpose “We exist to eliminate the distances between people”, and discussions being held with management figures.

The **Sustainability** aspects were addressed starting with the presentation of the sustainability plan (ESG PLAN) and its goals. Various meetings were held, which focused on the commitments and the results that the company has achieved in various areas, such as digital accessibility for people with disabilities, and the guarantee of gender equality. As far as Energy Management is concerned, Wind Tre shared its programme and commitment to energy efficiency, with the goals of limiting its CO<sub>2</sub> emissions and reducing its environmental impact.

With regard to the **Transparency** programme, in addition to the journey that the company has embarked upon alongside the AACCs, with meetings dedicated to customer management aspects and the conciliation process throughout Italy, the company also had two occasions to share its ideas with the national AACCs. The first involved a workshop on the “WindTre Luce e Gas powered by ACEA Energia” offer, which sparked a dialogue concerning all aspects relating to customer management. The second involved the “Please don’t call” spam protection service, which customers can enable through the WINDTRE App in order to protect themselves from receiving unwanted calls.

Finally, with regard to the **Dissemination** area, several representatives of the AACC took part in the orientation tour of the Tor Cervara plant, where there’s also a BTS plant. The meeting served as an opportunity to illustrate the Management Technology activities and to discuss the network’s main performance values.

The discussion touched upon Wind Tre’s support for the “**5G and Digital Culture**” project, which saw the Associations engaged in an independent civic consultation to determine their members overall “sentiments” about 5G, surveying their perceptions and prejudices regarding new technologies.

The company’s engagement with the AACCs continues in 2023, with the goal of maintaining an ongoing dialogue, even in relation to the institutional stakeholders.

*Improving dialogue, in respect of mutual prerogatives, to improve the relationship between business and consumer. In our opinion, this is the aspect at the basis of the signed protocol with Wind Tre, which aims to open up a new and different season in relations with the Company. The hope is that Wind Tre will be able to open up more and more to the needs of consumers, improving listening to the concrete needs related to connectivity and also of everything related to the perception of new technologies. In this sense, the work carried out with the 5G and Digital Culture initiative, and in particular the related survey widespread by us, which has provided important data on the perception of 5G by consumers everywhere in the national territory.*



MARTINA DONINI  
U.DI.CON

## Clarity and transparency in commercial communications

GRI 417-3

In 2022, Wind Tre did not receive any non-compliance complaints regarding its commercial or marketing communications.

The following table shows the number of disputes registered over the past five years.

Non-compliance disputes relating to marketing communications [GRI 417-3]	2022	2021	2020	2019	2018
Non-compliance disputes resulting in fines or penalties (no.)	0	0	0	0	1
Non-compliance disputes that resulted in reprimands (no.)	0	1	2	1	0
Non-compliance disputes resulting in voluntary commitments (no.)	0	1	2	1	1





# MORE HUMANITY

We believe that digital technologies are a means of reducing distances and guaranteeing **greater inclusion** and access to the network, regardless of race, gender, age, disabilities, or social status. We consider it to be fundamental to reduce the **digital divide**, to the point of eliminating it entirely.

That's why we're investing in a network that's accessible and affordable, to the benefit of our customers and all communities, striving to ensure **equal access** and promoting equal opportunities for all.

Inclusion also means access to adequate skills, which is why we are committed to **continuously providing learning opportunities** designed to prepare people for the challenges posed by digitisation.

- Digital Divide •
- Gender Parity •
- Inclusion of disabilities •
- Closer to the community •
- Lifelong digital learning •
- Closer to Wind Tre's people •



[BACK TO SUMMARY](#)





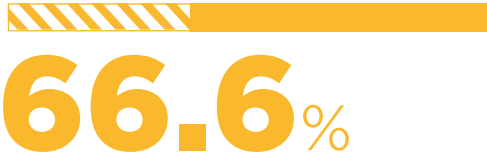
# DIGITAL DIVIDE

The digital divide is the **gap that exists in terms of access to new technologies**, particularly the Internet, mainly due to territorial, economic, cultural, personal, and technological factors.

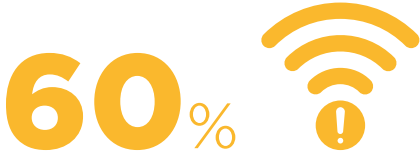
Over the past year, Italy has made significant progress in terms of disseminating connectivity, above all with regard to 5G coverage, which increased from just 8% of inhabited areas in 2021 to 99.7% in 2022, thanks in part to the use of spectrum sharing technology. Fixed broadband, on the other hand, reaches 66% of households, a percentage that, although increasing, remains far short of the EU average (78%), and just 7% of households have a 1Gbps line<sup>32</sup>. Despite the rapid expansion of the digitisation process, there remains an initial territorial gap. In the south, in fact, about 6 out of 10 residents have limited access to Ultra-Broadband connectivity, while 17.3% live in areas that are far removed from this standard. In the cen-

tral and northern regions, this figure is 4.2%<sup>33</sup>. Reducing and ultimately overcoming the digital divide means continuously **striving to bring digital technologies everywhere**, and ensuring the creation of an inclusive, accessible, and affordable network for the benefit of those segments of the population that have been marginalised for socio-demographic or economic reasons. **This is the focus of the National Strategy for Ultra Broadband, which aims to increase nationwide connectivity speeds to 1 Gbps by 2026**, through 7 courses of action. In particular, in addition to the Plan for the white areas and the Voucher Plan, the “1 Giga Italy” Plan, the “5G Italy” Plan, the “Connected Schools” Plan, the “Connected Healthcare” Plan, and the “Minor Islands” Plan have also been implemented. To support these interventions, the National Recovery and Resilience Plan has allocated € 6.7 billion in resources, and all the relevant contracts have already been awarded.

32 Digitisation of Economy and Society Index (DESI) 2022, Italy  
33 TERRITORIAL GAPS IN THE NRRP: TEN GOALS FOR THE SOUTH, Istat



The percentage of connections in Italy at speeds greater than 100 Mbit/s as of September 2022  
(AGCOM, 2022)



The percentage of Southern Italian residents who have limited access to ultra broadband connectivity  
(Istat, 2022)



The nationwide coverage target for 2026 set by the Italian strategy for ultra-broadband  
(Department for Digital Transformation, 2022)

The deadlines set in the Plan are ambitious, and require considerable effort on the part of the players in the field. Above all the Telecommunications operators, who play a primary role in closing the nationwide digital gap, and planning the next digital infrastructure interventions together with Infratel, the company that the government has entrusted with the task of mapping the networks. But it is equally crucial to promote the spread of digital culture, so

that **the progress made in terms of territorial coverage is not rendered ineffectual due to insufficient computer literacy.**

It is just as urgent to implement an industrial policy for the sector aimed at supporting the operators' investments, in order to continue developing wide-reaching and high-performance networks.

## What it means to us



Striving to bridge the gaps between geographical areas and to ensure more uniform internet access



Expanding and modernise digital infrastructures to establish a solid digital foundation for 4.0 technologies



Implementing the corporate “purpose” of eliminating distances between people



Engaging in constant dialogue with public administrations to facilitate access to new technologies



Offering concrete support to the more vulnerable segments of the population

Our ESG goals



SENIORS 100% CONNECTED  
by 2025

“We want to actively contribute to the digital inclusion of the elderly, by putting our Purpose into practice”



TOMMASO VITALI  
Sustainability Ambassador

Head of B2C Marketing & New Business

THE POINT WE'RE AT

COURSES OF ACTION

- Inclusion of people over 60 in the **digital literacy education pathway** promoted by the NeoConnessi project
- Development of **digital education tools to disseminate digital awareness** through new tutorials and the creation of online communities
- Launch of **partnerships with local authorities and consumer associations** to reach the target and leverage their reliability
- Launch of the NeoConnessi Silver platform with articles and insights on safe Internet usage
- Creation of a Facebook Group dedicated to Seniors in order to create a community and share experiences
- Over 590,000 views on the YouTube campaign dedicated to people over 60, with video tutorials dedicated specifically to help them
- Virtual school field trip to Naples and Procida for Grandparents' Day, promoted by the NeoConnessi project

NeoConnessi Silver: helping seniors become familiar with technology

Senior citizens make up one of the segments of the population that has the greatest difficulty integrating into this increasingly digital world. Unfortunately, the so-called **Silver generation, which represents a cultural and social asset of enormous value for our families and society**, is sometimes forgotten or marginalised.

In order to help seniors familiarise themselves with technology, Wind Tre has decided to expand the NeoConnessi project with **a section of the portal dedicated to people Over 60: NeoConnessi Silver**, which contains articles and insights designed to help seniors learn how to safely take advantage of everything the Internet has to offer. At the end of 2022, Wind Tre also carried out a YouTube campaign to invite people over 60 to take advantage of the video tutorials dedicated specifically to them; with about **590K**

**views**<sup>34</sup>, the campaign achieved excellent results. There's even a dedicated Facebook group called **NeoConnessi Silver - Grandparents and Over60s on the Internet**, where seniors can exchange advice and ideas, and engage in discussion on digital topics. This programme crates an intergenerational bond between grandparents and their grandchildren, and even allows this extraordinary value to be increased in terms of welfare.

Finally, to mark Grandparent's Day, this year NeoConnessi invited **students, teachers, and grandparents** to participate in a **virtual trip** together: a visit to the cities of Naples and Procida, Italy's Capital City of Culture for 2022. The tour was attended by about 1,700 registered classes in 786 different cities with 10,490 connected devices and about 36,000 students.



**NEOCONNESSI SILVER**  
The section of the NeoConnessi portal dedicated to people Over 60 with articles and insights

Wi-Fi Calling

Wind Tre is the first Telco in Italy to have introduced the Wi-Fi Calling service, launched at the end of 2022 following authorization by the Authorities. The service allows calls to be made and received via Wind Tre Wi-Fi connections, even when no mobile signal is present. This feature addresses a specific need: to be able to make and receive calls with one's own smartphone, as well as to make emergency calls, even from within thick-walled buildings, isolated homes, basements, shops and restaurants, or in any other situations where mobile coverage might be obstructed. All with a seamless experience, and without any dropped calls, as the call switches from the

cellular network to Wi-Fi, and vice versa. With the launch of WiFi Calling, Wind Tre has reaffirmed its closeness to its customers, through a service based on increasingly innovative technologies that's capable of **overcoming the digital divide in terms of mobile coverage**. WiFi Calling is available **free of charge** to Wind Tre's consumer and business customers with compatible smartphone devices<sup>35</sup>. The WiFi Calling feature does not entail any costs in beyond the applicable rate plan, can be used nationwide, and does not require any app to be installed on or any manual configuration settings to be applied to the mobile device. manuale del dispositivo mobile.

<sup>34</sup> Only views in which the user followed the video tutorial for more than 50% of its entire duration were taken into consideration  
<sup>35</sup> The updated list of compatible devices can be found at the following link: <https://www.windtre.it/wi-fi-calling-windtre/>



Our ESG goals



CONNECTED VILLAGES  
by 2025



ALBERTO PIETROMARCHI  
Sustainability  
Ambassador  
  
Head of WHOLESale

“We want to foster  
the growth of small  
Italian villages through  
connectivity and smart  
technologies”

COURSES OF ACTION

- **Improvement of mobile network coverage** and elimination of FTTH (Fibre-To-The-Home) gaps with FWA (Fixed Wireless Access)
- Development of **education programmes** targeting the Public Administration, businesses, and citizens
- Development of **protocols of understanding** for the range of programmes and projects offered to local government bodies
- Development of **connectivity services for communities**, such as Wi-Fi coverage in public areas
- Attendance of events and funding of **local initiatives intended to benefit communities**

THE POINT WE'RE AT

- Adhesion of 77 municipalities to the Borghi Connessi project, for a total of about 267,000 citizens
- Launch of digital transition initiatives to support Local Administrations
- Assistance with the organisation of events focused on the digital divide and innovation
- Ascoli Piceno: 9 events dedicated to the territorial, artistic, cultural, and landscape enhancement of the Ascoli Piceno area
- Attendance of the 39th Annual Assembly of the ANCI



Connected Villages

The **Connected Villages**” project, launched at the end of 2021, saw its first full year of actual operation in 2022. The project’s goal is to help small villages overcome the cultural obstacles that sometimes hinder the dissemination of new technologies, and to trigger a journey toward a new and more sustainable process of development.

The project is focused on four main areas:

- **Education about new technologies;**
- **assessment of Telecommunications infra-structures;**
- **development of dedicated community services<sup>36</sup>, and one-to-one consulting on technology needs.**

In terms of Education, young people, seniors, small businesses, and public administrators are provided with training courses on the benefits of the latest telecommunications solutions, thus paving the way for the other three areas of the project.

During the course of 2022, **77 municipalities** joined the initiative, for a total of about **267,000** citizens. The elementary schools in these small villages are already holding the training courses for children in the 4th and 5th grades, and training courses for seniors had already been held in 21 of them by the end of 2022.

The dialogue aimed at sharing the “Connected Villages” initiative with the local administrations consisted of about 100 hours of conferences and meetings held both inside and outside the company, in order to determine the specific areas’ digital needs.



**77**  
Municipalities that  
have already joined  
the Borghi Connessi  
project



*Bomarzo is a small town today at the center of attention as a tourist destination but also as a place to live. For some time, our administration has been pursuing the desire to bring people closer the new generations, but also the older ones, to the use of new technologies. Also for this we immediately welcomed the Wind Tre project “Connected Villages” with enthusiasm and we joined the initiative.*

MARCO PERNICONI  
MAYOR OF BOMARZO

<sup>36</sup> For these purposes, a free Wi-fi point was installed for one of the 77 participating municipalities



# GENDER PARITY

Although the gender employment gap has widened during the post-Covid era, there have nevertheless been **several noteworthy “achievements”** during these years: Kamala Harris became the first female Vice President of the United States of America, and, as such, is first in the presidential line of succession; Giorgia Meloni became Italy’s first female Prime Minister; and Samantha Cristoforetti was appointed to command the crew of the International Space Station.

**The wheels are certainly turning, but there’s still much to be done to achieve true gender equality worldwide.**

Equality must become a global priority, requiring everyone’s commitment to eliminate gender inequality, and to promote equality in all aspects of life.

Italy has shown some encouraging trends, including a **greater number of women** holding

**top corporate and political positions**, and a **recovery** in the **female employment rate**. **Our country ranks 63rd out of 146 countries monitored at the global level in terms of female health, education, and economic and political participation, with respect to men**<sup>37</sup>.

Italy continues to hold the same position it did in 2021, after Uganda (61st), and Zambia (62nd). At the European level, our country ranks 25th out of 35. Even as the employment rate increases (reaching 60.5% last October, the highest value since 1977), there remains a significant gap between the male and female employment, which amount to 69.5% and 51.4%, respectively, for a gender gap of 18%<sup>38</sup>. And the gap is even greater for young people 15 to 24 years of age.

Low employment rate, mostly temporary, part-time, and in low-paying or non-strategic sectors, as well as a growth in family-related

37 The WEF annual “Global Gender Gap Index” report, which measures the gender gap in 146 countries in terms of health, education, and economic and political participation  
38 Gender Policies Report 2022 by Inapp (Italy’s National Institute for Public Policy Analysis)



The number of years needed to close the global gender gap (World Economic Forum, 2022)



The gender gap in the Italian employment rates as of October 2022 (Inapp, 2022)



The percentage of women to be represented on the Boards of EU-listed companies by June 2026, according to the Women on Boards directive (Parlamento Europeo, 2022)

inactivity: all this also affects women’s self-esteem, with 59% of women employed in large companies aspiring to advance their careers, but lacking confidence in their ability to obtain leadership positions<sup>39</sup>.

Companies can play an important role in eliminating the gender employment gap, and the introduction of a strong and effective policy in this sense will have considerable benefits for the company itself. In fact, according to 3

out of 4 managers, a proper **gender balance among the company’s senior management leads better performance**.

However, there are still too few companies that have adopted an organised structure aimed at reducing gender inequality: 68% don’t have a structure that fosters the inclusion of women, and just 21% expect to adopt one in the medium term.

## What it means to us



Ensuring gender equality in terms of access to opportunities for growth, career development, and remuneration



Promote female leadership



Promoting and maintaining an open and inclusive culture

39 Bain & Company, 2021, “Italy isn’t (yet) a country for women”



Our ESG goals



GENDER PARITY  
by 2025

“We want to guarantee gender equality at the time of hiring and throughout the employment relationship in the case of any promotions or role changes, nurturing and maintaining an open and inclusive culture using every available lever”

COURSES OF ACTION

- **Empowerment courses** to support a culture also oriented towards gender equality
- Guarantee of **gender equality** in the promotion and in all remuneration policies
- **Moments of listening** dedicated to gathering needs and expectations
- Promotion of practices and policies aimed at **supporting a culture of equality**



MANUELA GIUSTI  
Sustainability  
Ambassador

Head of  
HR management  
& compensation



SERGIO GONELLA  
Sustainability  
Ambassador

Head of culture,  
development, inclusion  
& talent acquisition

THE POINT WE'RE AT

- First Telco company in the world to obtain Equal Salary certification
- Diversity Leaders in Europe 2023 according to Statista and the Financial Times
- The partnership with PARKS Liberi e Uguali for webinars on affective orientation and gender identity
- The partnership with the Gemelli Polyclinic of Rome and the Assolei Association for the opening of the first Anti-Violence Centre within the Gemelli Polyclinic of Rome
- Increase in the percentage of female managers, which currently stands at 28%
- The launch of the company's first Women's Academy
- GENERATIONS 4 INCLUSION, the first initiative dedicated entirely to intergenerational teamwork on Diversity and Inclusion issues

Focus on Diversity & Inclusion

GRI 405-1

GRI 405-2

During 2022, Wind Tre held a series of **webinars on affective orientation and gender identity**, which were open to all the company's personnel. These webinars were held in partnership with **PARKS Liberi e Uguali**, a non-profit association that works with companies to develop strategies, best practices, and behaviours that are respectful of diversity and promote inclusion, with a particular focus on LGBTQ+ issues. The purpose of this initiative is to promote an open, inclusive, and respectful work environment, where all people are free to express their uniqueness and identities.

In partnership with the Gemelli Polyclinic of Rome and the Assolei Association, Wind Tre also announced the opening of the first **Anti-Violence Centre** within the Gemelli Polyclinic of Rome on 2 March 2023. A gesture of closeness and humanity that attests to the company's concrete commitment over time, and will be accompanied by digital training initiatives and awareness raising activities regarding violence, with a specific focus on digital violence, in keeping with the company's initiatives dedicated to digital responsibility. During 2022, Wind Tre also launched and implemented the company's first **Women's Academy** dedicated to empowering women and supporting their personal and professional growth. The "Women's Academy" and "Women's Academy 4 Executives" courses were attended by a to-

tal of 200 people (Executives, People Managers, and Professionals), and were aimed at helping women develop greater self-awareness, understand gender biases and their influence, and build career paths that are consistent with their identities and life cycles. **The total number of training hours provided exceeded 2,500.**

In line with Goal 6 of its ESG Plan, in 2022 Wind Tre once again participated in several projects focusing on gender equality, especially in the STEM (Science, Technology, Engineering and Mathematics) field.

In the interests of highlighting the talents of young girls within STEM faculties, Wind Tre collaborates with numerous universities, implementing education and hiring programmes focusing on female talent: examples of this commitment include the **"Data Girls"** projects, in partnership with LUISS Business School, and the **"Technology Operations Growing Camp"**, in partnership with the Federico II University of Naples and Sapienza University of Rome, which concluded its second edition at the end of 2022.

Wind Tre also supports **Valore D**, the first association of companies dedicated to promoting gender balance and establishing inclusive corporate cultures, and is committed to ensuring an equitable representation of men and women in its communications, and in all events in which company's



**2,500**  
Training hours  
provided with  
the first Women  
Academy



personnel take part, also thanks to its partnership with **Minima Moralia**.

The company department in charge of Diversity & Inclusion is responsible for helping the company achieve its goals in terms of gender equality and social inclusion. Its responsibilities include:

- establishing the company's Diversity & Inclusion strategy and plans, in keeping with the Brand's purpose, values, positioning, and sustainability plans, and in a manner that's consistent with the Group's guidelines;
- ensuring that the company's processes and activities are consistent with the principles of equity, equal opportunity, diversity and inclusion, in consideration of all the various aspects this can entail, such as gender, ethnicity, age, religion, disability, and affective orientation;
- ensuring the implementation of the Diversity & Inclusion strategy and plans, even focusing on the achievement of corporate organisational well-being, in collaboration with the competent corporate bodies, based on the initiatives and processes involved.

Ensure the promotion of projects, activities, and analyses aimed at improving working conditions for people with disabilities within the company, through the Disability Hub.

The percentage of women by contract level (%) [GRI 405-1b]	2022	2021	2020	2019	2018
White collar	52%	52%	51%	51%	50%
Supervisors	27%	27%	26%	26%	25%
Management	28%	28%	26%	23%	22%
Total	49%	49%	48%	48%	47%

Gender diversity [GRI 405-1a]	2022	2021	2020	2019	2018
Women on the Board of Directors	14%	17%	17%	17%	0%
> 50 years	100%	100%	100%	100%	100%
Women on the Executive Committee	11%	14%	14%	14%	13%
> 50 years	100%	100%	100%	100%	100%
Women in senior leadership positions	28%	28%	26%	23%	22%
30-50 years	30%	43%	50%	61%	59%
> 50 years	70%	57%	50%	39%	41%
Women hired	40%	43%	49%	48%	54%
< 30 years old	71%	65%	60%	66%	67%
30-50 years	29%	29%	30%	33%	33%
> 50 years	0%	6%	10%	2%	0%

In order to promote an open and inclusive culture, Wind Tre stimulates dialogue, cooperation, and feedback among its personnel from different generations. In order to do so, in 2022 Wind Tre launched GENERATIONS 4 INCLUSION, the first initiative dedicated entirely to intergenerational teamwork on Diversity and Inclusion issues, such as: gender equality, age and generations, parenting and caregiving, disabilities, LGBTQ+, language, and inclusive behaviour.

The Generations 4 Inclusion initiative involved 72 employees grouped into 12 diverse and inclusive teams representing all ages, genders, skills, and departments. Each team worked on a specific D&I theme, with the aim of carrying out concrete projects and proposals consistent with the company's purpose, values, and goals. All the projects were submitted during the first quarter of 2023 and were evaluated by an internal jury tasked with determining which one would be carried out within the company. The winning projects addressed LGBTQ+ and Inclusive language and behaviour issues, and the projects will be carried out during the course of 2023.

Ratio of basic salary to male/female pay [GRI 405-2]						
Level	Rome	Rho	Pozzuoli	Ivrea	Palermo	Company Total (including smaller locations)
3	1.00	-	-	-	1.05	1.01
4	1.05	-	-	-	-	1.03
5	0.97	1.01	1.00	0.99	0.99	1.00
6	0.96	0.98	0.97	0.96	1.02	0.98
7	0.93	0.96	0.95	0.95	0.87	0.95
Q	0.99	0.95	0.82	1.00	1.05	0.97

Awards obtained

Thanks to the analysis of the activities carried out in 2022, Wind Tre was awarded **Top Employer Italy** certification for the 5th consecutive year in recognition of its excellent HR practices dedicated to the development and well-being of its personnel. Among the categories inspected, Wind Tre's 'Diversity and Inclusion' score (98.57%) far exceeded (+19.03%) the benchmark score of the other 141 Top Employer Companies in Italy (79.54%).

In 2022, Wind Tre became **the world's first TELCO company to obtain Equal Salary certification**. The certification awarded by the EQUAL-SALARY Foundation, following of a voluntary audit carried out between May and December 2021, is based on a rigorous methodology developed in collaboration with the University of Geneva, and entailed the involvement of the company PwC in audits that will also be periodically repeated in the years to come.

The certification attests to the fact that there is no pay gap between women and men with equal qualifications and duties, and was obtained thanks to the Diversity & Inclusion policies that the company has maintained for many years. The Certification is valid for 3 years, and each year Wind Tre takes part in a review dedicated to monitoring the status of the corrective measures identified during the first audit.

The attainment of Equal-Salary Certification was an important milestone for Wind Tre, and was announced in March of 2022 with a major press campaign, which included the publication of original content, with contributions from several male and female colleagues who volunteered to represent the issue.

In 2022, Wind Tre was recognised and certified (using the social listening methodology) by Statista and Corriere della Sera's "Buone Notizie" as **Italy's Best Employer** out of the top 400 employers most valued and recommended by Italian workers as the most desirable places to work.

Wind Tre was once again recognised as a **Diversity Leader in Europe 2023** (Statista&Financial Times), having been included among the list of employers who have demonstrated outstanding leadership in diversity and inclusion, and ranked among the 850 Diversity Leaders Companies in Europe, of which just 42 were Italian companies.

In May of 2022, the Co-CEO of Wind Tre, Gianluca Corti, received the **CEOforLIFE AWARD**, a well-known award reserved for CEOs who set new standards of excellence with sustainability initiatives, for projects aimed at promoting gender equality.



**EQUAL SALARY**  
First Telco company in the world to be certified







# INCLUSION OF DISABILITIES

15% of the world's population (equivalent to about one billion people) suffer from some sort of disabling condition. Which makes these individuals the world's largest community of people in need of "inclusion", second only to those with gender issues. In Italy, 3.1 million people, or rather 5.2 % of the population, suffer from considerable limitations in carrying out normal daily activities due to various kinds of health problems<sup>40</sup>.

Aware of the fact that creating a workplace that's inclusive and welcoming for all workers constitutes a true organisational process, the inclusion of people with disabilities at the workplace is a commitment that more and more companies are embracing. However, there's still a long way to go: today, **40% of people with disabilities do not feel adequately valued by their companies**, and 46% do not consider the companies for which they work to be places where they're able to express their full potential<sup>41</sup>.

Under Mission 5, "Inclusion and Cohesion", the National Recovery and Resilience Plan (NRRP) lays out specific measures to be taken for people with disabilities, in order to promote the greatest possible level of autonomy and effective integration within society. The Plan also emphasises the need to design and build environments based on criteria that promote inclusion and facilitate enjoyment by all possible users.

Inail is currently conducting research on safe and accessible work environments, with the aim of identifying measures and techniques for improving occupational safety, adapting the physical environment using products and technologies as tools for inclusion rather than barriers. The study aims to highlight the relationships between the workers' different needs, identifying any potential cognitive, physical, and sensory barriers, in order to determine the solutions needed to improve the levels of health and safety for all workers.

40 Inail: News 06/03/2023  
41 Dynamo Academy: People with disabilities, 40% do not feel valued as individuals by their companies, 2021



OVER 3 MILLION

The number of people in Italy suffering from health-related limitations (Istituto Piepoli, 2022)



35%

The employment rate of people with disabilities in Italy, as opposed to the European average of 50% (Eures, 2022)



OVER 1 BILLION

The number of people with disabilities worldwide in 2021 (WHO, 2021)

This is the driving force behind Inail's newly established partnership with the Order of Architects of Rome, which launched the Accessibility Observatory.

One of the main difficulties lies in the fact that disabilities can vary considerably, and, not all of them are evident. Disabilities frequently arise during a person's lifetime, and are often invisible, and for this reason they aren't taken into consideration by others<sup>42</sup>.

In 2021, the telecommunications sector took another step forward to ensure the inclusion of people with disabilities. The Communications Authority adopted a new resolution on **pricing**

**discounts for the fixed and mobile network**, which was integrated in 2023, and the current recipients also include people with severe mobility limitations, as well as people with severe vision and hearing impairments<sup>43</sup>.

Finally, **technological innovation and the use of Artificial Intelligence have fostered the development of tools and services that facilitate everyone's access to digital technologies**. For example, computer vision technologies help blind people perceive the surrounding world more easily, and speech recognition and translation tools allow deaf people to read in real time. The latest robotics systems will also be able to assist people with reduced mobility.

## What it means to us



Listening to and promptly meeting the needs of people with disabilities



RMaking our digital channels accessible to everyone



Offering people with disabilities a work environment that's tailored to their needs

42 Fondazione ISTUD: Disabilities and Work, 2021  
43 AGCOM: Resolution no. 290/21/ CONS, 2021 and Resolution no. 36/23/CONS, 2023

Our ESG goals



DIGITAL ACCESSIBILITY  
FOR PEOPLE WITH DISABILITIES  
by 2024



MIRKO RUGARLI  
Sustainability Ambassador  
Head of customer experience & data analytics

“We want to ensure that all the information and support tools provided by Wind Tre to its customers can be easily accessed by people with disabilities”

COURSES OF ACTION

- To make the company’s **digital channels fully accessible** to people with disabilities
- Accessible communication and reporting** through the use of subtitles and Italian Sign Language
- Expansion of the range of products and services** with solutions dedicated to people with disabilities
- Creation of **customer support services accessible** to people with disabilities

THE POINT WE’RE AT

- Creation of an internal Disability Hub for collecting reports and suggestions from employees
- A promotion for people with vision and hearing impairments and a dedicated support line have been made available
- Improvement of the accessibility index for the digital touchpoints and the Wind Tre, Very, and Wind Tre Business websites by up to 75%.

Digital accessibility

One of the goals of the company’s ESG Plan is to improve digital accessibility to Wind Tre services by people with visual or motor impairments. In accordance with lines of action associated with this goal, during the course of 2022 **specific interventions were carried out on the company’s digital touchpoints and its main websites**: Wind Tre, Very, Wind Tre Business and Wind Tre Group. Specific developments and accessibility plug-ins have been introduced on all these websites, thus offering a wide range of accessibility features that can be managed directly by the user (designed to make web pages **easier**

**to perceive, understand, and navigate for users with disabilities**). As a result of these interventions, the company has more than doubled the accessibility of digital channels for people with disabilities<sup>44</sup>. The interventions carried out by Wind Tre included the improvement of the digital colour palette guidelines within Design System Management, so that they would be fully accessible to visually impaired users. In 2023, the company is committed to maintaining a focus on the web touchpoints (Wind Tre.it, Verymobile.it, Windtrebusiness.it), with the goal of further improving their accessibility.

Dedicated services

In order to formalise Wind Tre’s commitment to the inclusion of people with disabilities in 2020 thanks to the Wind Tre’s disability manager, a working table has been set up with FISH Onlus-Italian Federation for overcoming handicap, to explore and listen to the needs of some of the most common disabilities and adapt the portfolio of Wind Tre offers so that they are accessible to all. For example, with the support of experts, Wind Tre has formulated specific offers for the hearing and visually impaired. The **Offer for the hearing and visually impaired** includes 25 GB at maximum speed, unlimited minutes and 2,000 SMS at a reduced price, as well as a dedicated helpline via WhatsApp. In order to improve the quality of life and day-to-day safety of seniors and people with disabilities, Wind Tre has also made available its ‘Full Care’ offer. The offer consists of unlimited voice and Data traffic, and the health monitoring **Comarch Life Wristband**, which allows the

wearer to monitor their heart rate, track their geolocation, and initiate emergency calls with a simple touch of the display. In September of 2022, Wind Tre introduced a new offer for Wind Tre employees who provide care for the elderly, offering a discount for the purchase of the new Comarch Life Wristband device, the smart wristband that improves people’s safety, and allows them to enjoy greater independence in their daily lives. Wind Tre employees can purchase the Full Care solution at the special price of € 4.99 per month ( ), instead of € 8.99 per month, and the deal includes Unlimited Minutes, 500MB of data, 200 texts, the smart device, and the dedicated app. In fact, the wristband is paired with the Comarch Care Mate app in order to monitor key vitals, such as heart rate and steps taken, and is connected to 2 emergency numbers that can be called automatically if needed.



**COMARCH LIFE WRISTBAND**  
The Wind Tre bracelet that allows monitoring of heart rate, geolocation and the initiation of emergency calls

<sup>44</sup> The level of accessibility was verified by an independent third-party company with a summary indicator that took into account the features implemented and their relative relevance, with a value of 75%, almost twice that of the previous year



# The Disability Hub and other in-house initiatives



BY YOUR SIDE

The initiative of Wind Tre that supports personnel with particular social welfare needs

In 2019 Wind Tre established the role of **Disability Manager**, and, at the organisational level, began **focusing on projects aimed at improving the working conditions for people with one or more disabilities, as well as their use of technological tools.** This focus is directed toward the company's employees, as well as outside the company, with a commitment to engaging in projects, partnerships, and services aimed at making people's daily lives easier. Through the **Disability Hub** section located on the company's intranet, every Wind Tre employee can submit reports or requests for support, and can find information and articles on disability-related issues.

In 2022, the company also remained commit-

ted to supporting Wind Tre personnel with particular social welfare needs, whether for themselves or their family members, through the **Al Tuo Fianco**, initiative, which grants them access to **an expert on the available public and private services.**

Employees who find themselves facing difficult situations in assisting elderly or disabled family members are thus able to obtain support in finding and booking home care solutions or stays at care facilities.

At the same time, information is also provided on the bureaucratic procedures, such as requests for attendance allowance, disability, and accreditation with the National Health System. Approximately 25 workers took advantage of this service in 2022.





## CLOSER TO THE COMMUNITY

According to a survey conducted each year by Edelman, companies are **the only entities today that retain the trust of citizens**, with a score of 61/100, while governments, NGOs and the media remain below the 60-point threshold<sup>45</sup>. Companies therefore play a fundamental role in supporting the communities in which they operate, as they possess the tools for their development. This is the meaning encapsulated by the concept of **shared value**. It's an approach that's based on the interdependent relationship between the competitiveness of companies and the well-being of the communities in which they operate.

Year-by-year, Italian companies are becoming increasingly interested in making a social and economic contribution to the development of their communities. According to the data from the 10th CSR Report presented by the Socialis Observatory<sup>46</sup> regarding the social, econom-

ic, and environmental investments of Italian companies, 96 % of Italian companies say they spend nearly € 300 thousand a year on Corporate Social Responsibility initiatives, for a total of **€ 2 billion 162 million** in 2021. In an ever-changing world, the values of Corporate Social Responsibility are essential to success on the market.

The sharing of the value generated by a company with the community therefore also has benefits for the business itself. On the one hand, it increases the employees' engagement in relation to their employer, as they feel more satisfied and connected to the company, while on the other hand it improves the **company's resilience** in the face of change. In fact, during the pandemic, the most cohesive companies suffered a smaller reduction in turnover than less cohesive companies, and appear to be more prepared for the new Transition 4.0<sup>47</sup>.

<sup>45</sup> Edelman (2021), Trust Barometer

<sup>46</sup> Socialis Observatory 2022

<sup>47</sup> I Quaderni Symbola (2021): Cohesion is competition

# 61/100

The global index of confidence in companies in 2022  
(Edelman Trust Barometer, 2022)

# +20%

The increase in the value of the donations made by Italian citizens in 2022 compared to 2021  
(Bva, Doxa 2022)

# 13%

The increase in productivity of companies that have embraced a well-structured CSR programme  
(Submittable, 2021)

## What it means to us



Supporting the communities in which we operate, also through social responsibility projects



Involving our customers in social support initiatives and projects together with non-profit organisations, placing our infrastructures at their disposal



Stimulating our personnel's active involvement in the solidarity initiatives promoted by the company





We're stronger together

Wind Tre makes its infrastructure available to the Third Sector Entities (TSEs) for numerous charitable causes, such as the charitable fundraising service and specific “cause related marketing” initiatives

The charitable fundraising service offered in collaboration with other Italian telephone service providers allows customers to make donations by sending texts or making phone calls from landlines. The funds raised are entirely transferred to the charity running the project supported. In 2022, Wind Tre raised and disbursed more than **€ 3 million**, providing the service of collection for the Third Sector Entities for a total of **80 social and humanitarian initiatives**.

As far as Wind Tre people are concerned, the company encourages their active involvement in the solidarity initiatives it promotes, both in terms of direct participation and in terms of shared choice. The initiatives proposed in 2022 included the following:

- **Sport Without Borders** – In March and April, Wind Tre people had the opportunity to take part in charity “relay” marathons in Rome and Milan, promoted by the non-profit organisation, in support of social inclusion projects for children in situations of socio-economic hardship.
- **Race For the Cure** – As they have often done in the past, in May the Wind Tre people participated in the Race For the Cure, in Rome, in order to raise awareness and money for the fight against breast cancer. Wind Tre made a “matching donation” for the amount collected by the employees with their registrations.
- **Italian Red Cross and Avis** – Like it does every year, Wind Tre organised several days dedicated to collecting blood donations involving all Wind Tre people. A small gesture of solidarity that has a major impact.
- **Charity Hub** – This is the dedicated section of the company’s intranet where users can find some of the non-profit organisations and associations with which Wind Tre collaborates, supported with periodical internal communication campaigns.

- **Made in carcere** – The main purpose of the Made in Carcere initiative is to disseminate the philosophy of giving female inmates a “Second Chance” and giving fabrics a “Second life”. For this reason, Wind Tre decided to donate its sales staff’s old uniforms to this organisation, in order to reuse the fabric and resell the regenerated product.

MADE IN CARCERE®  
New Philosophy and Life Style

*Made in Carcere always had the purpose of spreading the philosophy of the “Second Chance” for Women Prisoners and the “Second Life” for fabrics. It’s fundamental for us collaborating with companies that make ours their own principles and help us spread the messages of hope, concreteness and solidarity, but also of freedom and respect for the environment.*

LUCIANA DELLE DONNE  
MADE IN CARCERE

More generally, in order to engage its employees and show its support for the community, each year Wind Tre promotes the **Insieme si Può** (Together We Can) project, which allows all Wind Tre people to **propose and vote on charitable initiatives via the company intranet, which in turn will receive a contribution from the company**.

Four projects received awards during the 2022 edition:

- The **“Water Blue”** project, promoted by the non-profit organisation **“L’ABILITA”**, is aimed at giving boys and girls with autism spectrum disorders the opportunity to take part in motor skill activity classes in the water.
- The **“Casa dell’Amicizia”** (“House of Friendship”) project, promoted by the **Community of Sant’Egidio**, aims to welcome and support immigrant and non-immigrant minors from Ukraine who have fled the war or are living in conditions of hardship.
- The **“3R\_Made in Carcere: New Philosophy and life Style”** project, promoted by **Made In Carcere** (“Made in Prison”), aims to make the Made in Prison experience a replicable business model for other fledgling Third Sector social economy organisations.

- The **“Comunicazione ed Autismo”** (“Communication and Autism”) project, promoted by the non-profit organisation **Il Filo Dalla Torre**, is aimed at purchasing technological and next-generation tools to assist autistic people in their daily lives, and to help them communicate with the people in their lives.

Due to the need to keep people up-to-date on the activities introduced by all the company departments on ESG topics, in keeping with the practice established in 2020, every two months **all Wind Tre employees receive sustainability newsletter**. The Newsletter contains updates on the numerous initiatives underway, useful suggestions to encourage the staff’s engagement, and updates and news items on issues that the company holds dear, complete with editorials by managers and articles by promi-

nent personalities in the field of sustainability. Finally, with regard to corporate volunteering, during the second part of the year the External Affairs & Sustainability Department was involved in a **charity team building** activity at the headquarters of the KIM Association, a foster home that, for 25 years, has been committed to hosting and guaranteeing the right to care for children who are seriously ill and have no possibility of being treated in their countries of origin. Armed with gloves, shears, brushes, brooms, and markers, and divided into small groups, the management personnel carried out several maintenance and cleaning activities at the facility, and entertained the Association’s young guests by playing and drawing with them. The activity was promoted in-house with the aim of encouraging other departments to organise social and environmental volunteer activities as well.



*For almost twenty-six years we have chosen to be at the side of sick children holding up the flag of the Right to Care. A challenge that we can only carry on with other traveling companions, such as the friends of Wind Tre. Synergy with companies that express the best of our country is in fact a precious node of our network, and not only for the concrete support to our mission both in economic terms and in professionalism, but also as a path of mutual growth and sharing a great social responsibility towards who asks us for help.*

SALVATORE RIMMAUDO  
ASSOCIAZIONE KIM

Closer to the people of Ukraine

Wind Tre is close to the people of Ukraine, who have been fighting for their freedom for over a year. Since March of 2022, Wind Tre has been allowing all consumer and business customers to continue communicating with family and friends by providing free **unlimited minutes to the Ukrainian service provider Kyivstar**<sup>48</sup>. In addition, as of 12 May 2022, in collaboration with Comdata and Caritas Diocesana Montepulciano, Wind Tre launched a mobile **Front Line 159 service dedicated to Ukrainian users**. Calls received from customers are answered by refugees hosted by Caritas Diocesana Montepulciano, who, after undergoing a training

course, are able to answer the questions posed by their compatriots with Wind Tre SIM cards in their native language. According to Tommaso Vitali, Consumer Marketing Director, “this initiative, reaffirms Wind Tre’s closeness to the Ukrainian people during this emergency situation. For us, the project has a twofold social value, because in addition to fostering the integration of the individuals who have been hired by Comdata, it also allows us to make our support services more accessible to our Ukrainian customers, who can now communicate with the customer service staff in their native language.”



UNLIMITED MINUTES

To support the population of Ukraine Wind Tre gave unlimited free minutes to customers to be able to communicate with family and friends

<sup>48</sup> The initiative continued all throughout 2022, and, as of the date of this document, was extended up until 31 March 2023



# LIFELONG DIGITAL LEARNING

The ongoing digital transformation affects every aspect of our lives, and is also changing the world of work. **Digital skills are now essential, and companies and institutions expect most of their employees to master them.**

Italy is still lagging behind on the digital skills front. According to the Digital Economy and Society Index (DESI) 2022, just 46% of the population has basic digital skills, which is well below the EU average of 54%. In addition, the percentage of ICT graduates in Italy is very low, and just 3.8% of the total employed are specialists in these disciplines, which is once again lower than in the rest of Europe. At the same time, just 15 % of Italian companies provide ICT training to their employees, which is five percent below the EU average<sup>49</sup>.

The lack of digital skills is the main obstacle to the development of Intelligent Manufacturing and Smart Agriculture projects.

The manufacturing sector, for example, needs expertise in artificial intelligence, Machine learning, Data Science, and Project Management, as well as “soft skills” like multidisciplinary and entrepreneurship.

**Italy has implemented a National Digital Skills Strategy** through an Operational Plan adopted in December of 2020, which consists of 111 initiatives, and establishes milestones and targets to be achieved **by 2025**. These include **equipping 70% of the population with basic digital skills**, tripling the number of ICT graduates, and doubling the number of people with advanced digital skills. An initial implementation assessment carried out by the government in 2021 shows that general progress has been made, and we therefore need to continue on this pathway, taking action on all fronts, including digital literacy, retraining, improving workforce skills, and providing excellent quality education.

49 Digital Economy and Society Index (DESI) 2022, Italy



15%

The percentage of Italian companies that provide ICT training to their employees; 5% less than the European average (CE, 2022)



13.4%

The percentage of companies with at least 10 employees who employ ICT specialists, as opposed to the EU27 average of 21%. This figure was 12.6 % in 2020 (Istat, 2023)



70%

The percentage of European adults between 16 and 74 years of age who, according to the European goals, should have at least basic digital skills by 2025 (54% in 2021) (CE, 2022)

**Ongoing training** for professionals at the workplace has now become indispensable for organisations. In terms of active policies, a grant was provided by the New Skills Fund, which was funded again in 2022 with €1 billion. But the companies themselves also play an important role in encouraging the development of new skills. Telecommunications operators can make a significant contribution, for example, by providing experience and know-how gained in the field. It therefore becomes important to adopt a **collaborative public-private** perspective, working together towards a single goal, because improving digital skills and developing human capital are the basis for an inclusive and truly impactful digital transformation.

## What it means to us



Helping young people and their families face the challenges posed by an increasingly digital and in-person hybrid education



Supporting training programmes for skill improvement and development



Promoting lifelong digital learning among young people



Identifying and nurturing young talents



Preparing Wind Tre's personnel to face the challenges of the future



Our ESG goals



100% "FUTURE READY" PEOPLE  
by 2025

“We want to prepare the people of Wind Tre for the challenges of the future by supporting their employment and investing in lifelong learning opportunities”



SERGIO GONELLA  
Sustainability Ambassador  
  
Head of culture, development, inclusion & talent acquisition

COURSES OF ACTION

- To **develop a digital mindset and upgrade the personnel’s skills** to face the challenges of the future
- To **retrain the personnel** and upgrade their skills based on the market’s needs
- To promote a culture of **lifelong learning and self-development**
- To promote the use of **personalised training** based on individual needs and aptitudes

THE POINT WE’RE AT

- Over 385,000 hours of training provided in 2022 alone
- Identification of 28 skill areas (hard and soft) that are crucial for the future
- Entry into the corporate structure of the POLIMI Graduate School of Management

Continuous skill development

GRI 403-5 GRI 404-1 GRI 404-2

The programmes dedicated to providing training in **technical, digital, regulatory, and language** skills, as well as those dedicated to **technological development** and **soft skills**, continued in 2022, and were available to all employees based on specific roles and age groups.

In terms of specialised skills, Wind Tre has identified a number of important areas of transformative training on specific topics, such as Business Analysis, Six Sigma Green Belt, e-commerce Webinar & Phygital experience, Project Management, and many more.

Another important area worthy of mention is **Insourcing training**, the aim of which is to transfer specialised vertical skills internally, thus enabling the reskilling of numerous professional figures. By undergoing specially designed training courses, participants from the Technology and Commercial areas are able to carry out new and different activities previously performed by external suppliers and consultants.

Some of the main insourcing projects are listed below:

- **House Agency (ATL):** An in-house creative agency has been established to handle the management and creative development of Above-The-Line digital advertising communication activities for all markets and internal stakeholders
- **Coverage maintenance:** the focus of the training was to impart knowledge for the maintenance of special coverage sites (tunnels, special indoor sites, etc.)
- **Service Now:** configuration and implementation of the requirements and workflows on the Service Now platform to support the processes managed by the in-service platform and all the company departments that use them.
- **HIRO/ORIH:** Network supervision and first level troubleshooting activities for residual non-automated and IT Service Desk activities.

The **Technology Department** offered several training modules geared towards the **acquisition of new technological skills**, including the “from Machine to Deep Learning” webinar series, and specific modules on Data Breaches, the IOT, Ultra Broadband, Triple Reality, ICT Training, Mater 5G, Amazon, UniversITy.

With regard to soft skills, on the other hand, the forms of conduct indicated in the Citizenship model were highlighted. This model is meant to guide the Wind Tre employees’ conduct in carrying out their daily activities within the context of the people-oriented processes, through the adoption of the new **Human Working** model. In listening to the needs of the company’s staff, the desire to extend flexible work methodologies beyond the pandemic emerged. But in order to achieve a good work-life balance and respect the right to disconnect, dedicated training programmes had to be designed for all Wind Tre personnel.

In 2022, the **Digital Mindset & Transversal Skills** programme was renewed, which is aimed at developing the Digital mindset by providing a customised training programme on digital and innovation skills. The initiative is aimed at preparing Wind Tre’s personnel for the **challenges posed by the digital transformation**, and developing the necessary skills through a multi-year training course, which involves the entire company and is carried out in collaboration with MIP, the Business School at the Polytechnic University of Milan.

A training project on Cyber Security issues is also in the works for the entire corporate population, which will be carried out in partnership with the Polytechnic University of Milan (MIP), with the goal of promoting and disseminating a “cyber security culture” at all levels

The **soft skill and linguistic training** opportunities are still available, and are open to all Wind Tre employees via the **digital Conversation platform**.

After listening to the needs and suggestions of the employees, Wind Tre also created a new



training programme dedicated to the growth and consolidation of fixed-line telephony skills: the **Fixed Academy**. Launched in March of 2022 with over 400 employees and B2B sales associates participating, the programme was created in collaboration with various in-house organisational units and external vendors in order to ensure high quality training, and will continuously evolve based on the input and feedback received from participants.

With regard to the programmes dedicated to People Managers, Wind Tre has created and provided the following courses:

- **Hybrid Work4leaders:** in this course, the participants attend in-person sessions to discuss the most appropriate managerial behaviours for engaging with their resources and for effectively implementing our hybrid Human Working model;
- **Beyond Programme:** this training course, which was launched in 2021 and is now in its second year, is aimed at developing lateral critical thinking and strategic vision through in-person meetings with relevant experts;
- **Ignite Citizenship:** this inspirational training course is held through periodic virtual meetings with testimonials, and is aimed at



**BEYOND PROGRAM**

Wind Tre training course aimed at developing lateral critical thinking and strategic vision

providing greater insight on the behaviours and impacts of the Citizenship Model.

Skill development has always played a central role at Wind Tre, which became part of the **POLIMI Graduate School of Management's** corporate structure in September of 2022. The partnership between these two entities, which began in 2020 with the launch of D Factor, a digital mindset development project recognised as a Global Best Practice by the Top Employers Institute, has been strengthened with the direct participation of Wind Tre, and also serves as an important opportunity for the exchange of know-how and experiences.

In fact, being a partner of the POLIMI Graduate School of Management means sharing the same vision and values as the School itself, as well as helping guide the direction of the training activities. It also means having privileged access to all the services provided by the School.

In addition to Wind Tre, other partners of the POLIMI Graduate School of Management include the Polytechnic University of Milan, and various leading Italian and international companies, for a total of 23.

Training (hours) [GRI 403-5] [GRI 404-1]	2022	2021	2020	2019	2018
Total training	385,245	276,009	107,745	108,435	93,293
of which health and safety training	10,033	14,587	20,490	26,885	16,109
Average training per person	59.01	41.2	15.6	15.7	13.4

## A company tailored to Generation Z

For Wind Tre, promoting continuous digital learning also means **supporting the younger generation as they enter the world of work** and contributing to their orientation among the various opportunities that the TELCO world has to offer.

With regard to the integration of young graduates into the company, Wind Tre aims to further their personal and professional growth through

specific training interventions aimed at improving their skills and strengthening their sense of belonging, focusing on their integration into the company.

The training course that has been dedicated to them is called the **New Generation Program**, and consists of 3 stages:

- **Values:** which aims to convey an in depth understanding of Wind Three's corporate

- identity through the internalisation of our corporate purpose and values with a high-impact emotional experience;
- **Soft Skills:** which aims to strengthen 5 specific fundamental skills: self efficacy, effective communication and persuasion, emotional intelligence, storytelling, and public speaking;
- **Mentoring:** which aims to provide young people with a point of reference to guide them on their journeys of professional growth.

Participants in this course also have the opportunity to take part in special two-day training experience managed in partnership with the **Telethon Foundation**.

On the first day, **Telethon tells its story, starting with the Wind Tre values** and how they're also an integral part of the Foundation's own history and mission, the harmony between the two organisations, which serves as the basis for their partnership, and the importance of these values for everyone's work experience.

On the second day, which is much more experiential in nature, the participants visit the **NEMO Centre** for rare neuromuscular diseases at the Gemelli Hospital in Rome, where **the new Wind Tre staff members meet with patients and listen to their stories**. The day continues with additional testimonials from researchers and patients (both live and on video), and the experience ends with a group activity summing up all the considerations, concepts, and keywords that arose throughout the two days, and how they might be applied at the Company.

Once their insertion into the company has been completed, Wind Tre provides the Young Talents and those who are already people managers with access to the **Future Leaders** project: a corporate training programme held in collaboration with top Business Schools, which consists of specially designed training courses aimed at moulding the company's fu-

ture leaders. The Future Leaders programme also includes Mentoring, in order to support the participants on their journeys of self empowerment and personal growth.

Young students and recent graduates also have access to the **OnStage Internship Program**, which marked its seventh year in 2022. In this programme, graduates or recent graduates are supported by a Tutor, who assists them in carrying out a six-month internship. A training course is also provided during this period, consisting of six meetings held on a monthly basis, focused on the development of hard and soft skills. All activities during the internship programme are geared towards creating and consolidating an OnStage Community, where young talents can collaborate, share experiences and strengthen their professional network.

The programme was **revamped in digital mode for 2022, with the participation of 43 recent graduates**, 24 of whom were hired by Wind Tre at the end of their internship. A special focus is also placed on Personal Branding: through discussion with a professional coach, Wind Tre interns had the opportunity to learn how to recognise and enhance their own unique personal brand, both online and offline. Finally, the **Coding4Kids** project, an **internal faculty dedicated to children of employees 10 to 16 years of age**, was launched in 2022, with the participation of about 500 children.


In keeping with the company's values of responsibility and closeness, the project was created to help prepare new generations prepare for the professions of the future by introducing them to the study of programming and software development early in their scholastic careers. The initiative is designed and delivered by colleagues with technical expertise who have received training on the ways children and adolescents learn, resulting in a personalised and particularly entertaining course offering.



**CODING4KIDS**  
Internal faculty dedicated to children of employees 10 to 16 years of age



**FUTURE LEADERS**  
A corporate training programme held in collaboration with top Business Schools to support employees on their personal growth



*Telethon Foundation considers alliances as the main lever on which to act for the value generation for the benefit of all its stakeholders. It is necessary a constant commitment to encourage exchange between the various groups, sharing the meaning and the profound raison d'être of the Foundation's mission, the values that guide it and the goal, thus indicating the direction of a path that becomes common. From this point of view it is easy to understand how vital is the possibility of making the companies like Wind Tre, and above all to their People, the reality of the Foundation, having them to participate in the grounding of an able corporate citizenship project to express value towards all the actors involved and their own stakeholders.*

**SAMUELA MORTARA**  
TELETHON FOUNDATION





# CLOSER TO WIND TRE'S PEOPLE

As shown by a recent study, “well-being” at the workplace now plays an important role within Italian companies<sup>50</sup>, especially in light of the effects of the Covid-19 pandemic and the current socio-economic scenario.

The success of every business is primarily dependent upon the well-being of its personnel, and the post-pandemic period further highlighted the importance of this factor. **The amount of attention that workers pay to their own health** (47%), **nutrition** (38%), and **time with their loved ones** (25%) has increased with respect to 2019. This, in turn, has prompted an increasing number of people to consider welfare services and tools **dedicated to health-care and preventive care** (62%), **work-life balance** (59%), and **economic support** (56%) as crucial to meeting these new needs.

**Stress, burnout and anxiety are among the main factors that worsen a company's perfor-**

**mance<sup>51</sup>, and must be countered with well-being initiatives** that enable employees to feel satisfied and at ease at the workplace. In a recent Ipsos survey, about 45% of employees interviewed in 30 countries stated that they had suffered a deterioration in their mental health due to the pandemic (54% in Italy), and this has raised expectations in terms of corporate well-being. The survey also showed that 65% consider work-life-balance to be a goal that is still difficult to achieve within the work context, and view it as a factor that's even more important than remuneration<sup>52</sup>.

Corporate training also plays a role of primary importance in corporate and personal success, as it provides useful tools for improving the company's work quality, competitiveness, and ability to face future challenges. With regard to the forecast budget to be invested in training over the next three years, 39% of companies indicate that there will be growth, as opposed

50 Nomisma and Cirfood District Observatory, 2022  
51 Ipsos and AON: 2021 Global Wellbeing Survey, 2021  
52 Ibidem



83%

The percentage of companies in Italy that offer at least one wellbeing service for their employees  
(Nomisma, 2022)



48%

The business opportunity gap between multinationals with a more or less virtuous record on gender equality  
(McKinsey, 2020)

8 ON 10



Number of workers who consider the existence of a corporate welfare plan crucial when choosing a new job  
(Nomisma, 2022)

to 33% who expect there to be no change, thus attesting to the importance of upskilling and reskilling activities<sup>53</sup>.

## What it means to us



Promoting work-life balance, diversity, and equal opportunity throughout the company



Establishing employee welfare plans to improve their well-being and quality of life



Having an open dialogue with the company's personnel in order to constantly monitor their needs



Helping families with services that guarantee flexibility and a good work-life balance.



Communicating in a clear and transparent manner

53 Polimi Graduate School of Management, 2022

The Wind Tre team

GRI 2-7 GRI 2-8 GRI 401-1 GRI 401-3 GRI 405-1

As of 31 December 2022, Wind Tre's staff consisted of 6,518 people, 49% of whom are women. **The female presence among the managerial staff stands at 28%.** In line with previous years, almost all of the employees have open-ended contracts, and 80% have full-time contracts. Part-time contracts are mainly requested by female workers.

Since 2017, Wind Tre has been conducting an **engagement survey**, called #diciamolanostra, with which it collects feedback and shares results in a spirit of transparency and continuous improvement. With **4,543 questionnaires collected and a participation rate of 71%**, the November 2022 #diciamolanostra survey continued to record an **extremely high and stable rate of engagement** (86%), even higher than the external benchmark (+3% compared to Italy Norm - 127 Italian companies). In fact, Wind Tre ranks as a **Top Company in Italy in terms of Employee Experience**, with **92%** of its staff saying they are proud to be part of it, and **91%** saying they would recommend it as a good employer.

Listening to people is one of the main strategic courses of action to be taken in order to create an open and inclusive culture that's respectful of others peoples' opinions and identities. This is evidenced by the fact that, over the years,

the Engagement Survey has been enriched with new sections, including those on diversity and inclusion, wellbeing, ESG factors, agile working, and Trust&Future issues.

**The survey is carried out in two phases each year:** a full engagement survey, dedicated to the entire corporate population, and a pulse survey targeting a representative sample, which is conducted 6 months after the first. Our personnel also took part in **additional listening and focus group initiatives** aimed at establishing the Human Working model (the #ToBeSmart Survey) and the revamped internal communication strategy. In fact, continuous communication is one of the key factors of the Wind Tre model. In order to encourage people's engagement, even when they work at locations other than HQ, the company uses a mix of tools, including **physical proximity** and **online information**. The former include the top management's now-traditional visits to peripheral locations, and the latter include the **"Company Talks"**: a series of live streams on topics considered to be priorities by the Wind Tre personnel, which are broadcast on the company's intranet.

Changes in the workforce (new hires) [GRI 401-1]	2022				2021				2020				2019			
	Central Italy	Northern Italy	South and Islands	Total	Central Italy	Northern Italy	South and Islands	Total	Central Italy	Northern Italy	South and Islands	Total	Central Italy	Northern Italy	South and Islands	Total
Women	20	31	1	52	40	12	0	52	8	9	3	20	14	42	2	58
< 30 years old	12	25	0	37	28	6	0	34	4	8	0	12	6	32	0	38
30-50 years	8	6	1	15	11	4	0	15	3	1	2	6	7	10	2	19
> 50 years	0	0	0	0	1	2	0	3	1	0	1	2	1	0	0	1
Men	24	47	8	79	45	19	6	70	7	12	2	21	16	42	4	62
< 30 years old	15	29	4	48	28	10	1	39	2	2	1	5	6	28	1	35
30-50 years	8	17	4	29	16	9	5	30	4	10	1	15	10	14	3	27
> 50 years	1	1	0	2	1	0	0	1	1	0	0	1	0	0	0	0
Overall total	44	78	9	131	85	31	6	122	15	21	5	41	30	84	6	120

Changes in the workforce (terminations) [GRI 401-1]	2022				2021				2020				2019			
	Central Italy	Northern Italy	South and Islands	Total	Central Italy	Northern Italy	South and Islands	Total	Central Italy	Northern Italy	South and Islands	Total	Central Italy	Northern Italy	South and Islands	Total
Women	34	66	18	118	23	44	14	81	14	38	18	70	32	65	27	124
< 30 years old	3	10	0	13	1	4	0	5	0	6	0	6	1	9	0	10
30-50 years	17	37	13	67	14	30	12	56	9	23	18	50	27	47	26	100
> 50 years	14	19	5	38	8	10	2	20	5	9	0	14	4	9	1	14
Men	60	108	20	188	44	61	22	127	34	56	17	107	52	100	18	170
< 30 years old	2	14	0	16	2	4	0	6	2	4	1	7	2	11	0	13
30-50 years	25	46	10	81	13	21	7	41	18	26	10	54	27	59	16	102
> 50 years	33	48	10	91	29	36	15	80	14	26	6	46	23	30	2	55
Overall total	94	174	38	306	67	105	36	208	48	94	35	177	84	165	45	294

Distribution of the workforce by contractual level [GRI 405-1b]	2022		2021		2020		2019		2018	
	Total (n.)	%	Total (n.)	%	Total (n.)	%	Total (n.)	%	Total (n.)	%
White collar	5,740	88%	5,914	88%	6,008	88%	6,133	88%	6,307	88%
Supervisors	625	10%	627	10%	667	10%	681	10%	695	10%
Management	153	2%	152	2%	146	2%	143	2%	155	2%
Total	6,518	100%	6,693	100%	6,821	100%	6,957	100%	6,887	100%

Employees by age group with full time contracts [GRI 405-1b]	2022	2021	2020	2019	2018
< 30 years old	3%	2%	1%	1%	2%
30-50 years	66%	67%	67%	72%	76%
> 50 years	32%	32%	33%	27%	23%

Parental Leave [GRI 401.3] <sup>54</sup>	2022		2021		2020	
	Women	Men	Women	Men	Women	Men
GRI 401-3b Employees who took parental leave by gender	231	19	231	17	247	23
GRI 401-3c Employees who returned to work after taking parental leave by gender	219	19	197	17	210	23
GRI 401-3d Employees still at work one year since the end of parental leave	n.a.	n.a.	215	17	231	23
GRI 401-3e (return to work)	95%	100%	85%	100%	85%	100%
GRI 401-3e (retention)	n.a.	n.a.	102%	74%	76%	79%

54 For the data shown in the table, all absence codes related to maternity-type leaves (early, mandatory, optional 6 months and optional hand) were considered, and the criteria required by GRI 401-3 were applied. Employees who took parental leave in a certain year, with the leave being terminated prior to the end of that year, were considered to have returned to work. Employees who were still active workers (not terminated) 365 days after the last day of parental leave were considered in this cluster (this data is not available for the year 2022)



Distribution of employees by length of contract, by gender (no.) [GRI 2-7]	2022			2021			2020			2019			2018		
	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Open-ended contract	3,295	3,219	6,514	3,406	3,287	6,693	3,516	3,301	6,817	3,601	3,350	6,951	3,641	3,239	6,880
Fixed-term contract	2	2	4	0	0	0	2	2	4	3	3	6	5	2	7
Total	3,297	3,221	6,518	3,406	3,287	6,693	3,518	3,303	6,821	3,604	3,353	6,957	3,646	3,241	6,887

Distribution of employees by contract length, by geographical area (no.) [GRI 2-7]	2022				2021				2020				2019			
	Central Italy	Northern Italy	South and Islands	Total	Central Italy	Northern Italy	South and Islands	Total	Central Italy	Northern Italy	South and Islands	Total	Central Italy	Northern Italy	South and Islands	Total
Open-ended contracts	2,168	2,366	1,980	6,514	2,228	2,458	2,007	6,693	2,299	2,512	2,006	6,817	2,339	2,577	2,035	6,951
Fixed term contracts	3	1	0	4	0	0	0	0	0	1	3	4	1	2	3	6
Overall total	2,171	2,367	1,980	6,518	2,228	2,458	2,007	6,693	2,299	2,513	2,009	6,821	2,340	2,579	2,038	6,957

Distribution of employees by work hours (no.) [GRI 2-7]	2022			2021			2020			2019			2018		
	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Full-time	3,130	2,116	5,246	3,202	2,122	5,324	3,316	2,107	5,423	3,381	2,109	5,490	3,463	2,176	5,639
Part-time	167	1,105	1,272	204	1,165	1,369	202	1,196	1,398	223	1,244	1,467	183	1,065	1,248
Total	3,297	3,221	6,518	3,406	3,287	6,693	3,518	3,303	6,821	3,604	3,353	6,957	3,646	3,241	6,887

Full-time employees and distribution by gender and geographical region [GRI 2-7]	2022				2021				2020			
	Central Italy	Northern Italy	South and Islands	Total	Central Italy	Northern Italy	South and Islands	Total	Central Italy	Northern Italy	South and Islands	Total
Women	770	741	605	2,116	772	762	588	2,122	765	764	578	2,107
Men	1,176	1,257	697	3,130	1,203	1,306	693	3,202	1,261	1,342	713	3,316
Overall total	1,946	1,998	1,302	5,246	1,975	2,068	1,281	5,324	2,026	2,106	1,291	5,423

Part-time employees and distribution by gender and geographical region [GRI 2-7]	2022				2021				2020			
	Central Italy	Northern Italy	South and Islands	Total	Central Italy	Northern Italy	South and Islands	Total	Central Italy	Northern Italy	South and Islands	Total
Donna	197	315	593	1,105	215	326	624	1,165	237	338	621	1,196
Uomo	28	54	85	167	38	64	102	204	36	69	97	202
Totale complessivo	225	369	678	1,272	253	390	726	1,369	273	407	718	1,398

GRI 2 - 8 Non-employee workers <sup>55</sup>	2022	2021	2020
Agency workers	108	93	90

55 For the data shown in the table, all absence codes related to maternity-type leaves (early, mandatory, optional 6 months and optional hand) were considered, and the criteria required by GRI 401-3 were applied. Employees who took parental leave in a certain year, with the leave being terminated prior to the end of that year, were considered to have returned to work. Employees who were still active workers (not terminated) 365 days after the last day of parental leave were considered in this cluster (this data is not available for the year 2022)

## Top Employer Italy for the fifth consecutive year

For the fifth consecutive year, in acknowledgement of its commitment to caring for and valuing its people, Wind Tre has been awarded the **Top Employer Italy** label by the Top Employers Institute. The certification is the official recognition of corporate excellence in HR policies and strategies geared towards the satisfaction of people and the improvement of the working environment. It is awarded to companies that achieve the high standards required by the HR Best Practices Survey in key areas such as **People Strategy, Work Environment, Talent Acquisition, Learning, Well-being, Diversity & Inclusion**. Over the years, the Top Employers Institute has recognised Wind Tre's significant and ongoing commitment to caring for and empowering its people, indicating several of its "best practices" as sources of inspiration for Top Employers Italy and Global:

- Wind Tre's Human Working model, which the company adopted at the structural level in 2022, was included in the Top Employers Italy eBook 2021 due to its highly innovative, inclusive, responsible, and sustainable nature as a smart working model.
- The Digital Mindset development programme, D Factor, was published in the Top Employers Global Best Practice Report 2021. Open to all the company's personnel, and carried out in partnership with the Polytechnic University of Milan (MIP), the programme aims to develop digital and innovation skills that are fundamental for the future.
- The leadership model was included in the HR Best Practice Report Italy 2020, in order to create and disseminate a model of Leadership skills and behaviours, as a unifying element of corporate culture, and a key step in the managerial style integration process.



56 The non-employee workers on the company's workforce are hired under agency contracts, and work as sales clerks in stores. The figures correspond to the total employees at the end of the reporting period

Wind Tre has always used LinkedIn, the world's largest professional social network, as a means of communicating its culture and values on a daily basis. LinkedIn has recognised the com-

pany's authoritativeness and ability to create a significant capacity for audience involvement and engagement through its Company Page.

#HUMAN WORKING



After listening to the needs of the company's personnel, through a survey that highlighted their desire to extend the flexible working methods beyond the pandemic, in 2021 Wind Tre created a model based on **"why"** one should return to in-person working, rather than on **"how much"** one should return to in-person working. Sanctioned by an innovative trade union agreement, and recognised by the **'Top Employers Institute'** as an **Italian HR Best Practice**, smart working at Wind Tre is not only supported by the provision of technological tools, but also by training activities and a good conduct card (the 'We-etiquette'), which is intended to encourage remote working, while respecting the work-life balance and the right to disconnect.

Caring for people

GRI 401-2



PARENTHOOD

Within the scope of the welfare programs, numerous are the initiatives to support parents and new parents

Within the context of its **welfare programmes**, Wind Tre continues to conduct numerous initiatives aimed at helping parents manage their children. The company has made **nursery schools** available to its employees at its Rome, Pozzuoli and Palermo offices, and **kindergartens** in Pozzuoli and Palermo, in order to guarantee a service that's able to offer quality and flexibility, while at the same time guaranteeing the needs of children. The nursery schools and kindergartens are open 11 months a year, from September to July, and are open to the employees' children 1 to 3 years of age (nursery school) and 3 to 5 years of age (kindergarten). A total of 46 pre-school and kindergarten aged children were involved in 2022. In 2022, the need to be increasingly inclusive in supporting parenting with concrete actions led the company to completely redesign the service provided at the Rome, Pozzuoli, and Palermo facilities, and to experiment with new methods. At the end of 2022, therefore, the launch of a new model that will supersede the logic of the physical structures, and will replace the pre-

vious model starting with the 2023-2024 school year, was announced on the intranet. Regardless of location, therefore, anyone will be able to participate in a single, limited, nationwide ranking (120 spots, of which 29 will be reserved for children already attending physical facilities during the 22/23 school year up until the end of the cycle), valid for both preschools and kindergartens, which can be accessed via a dedicated application on the intranet with specific access requirements. Parents who are able to secure a spot in the national ranking will receive a financial contribution as partial reimbursement of expenses incurred for their children's school attendance at the private or public schools of their choice. The size of the financial contribution will depend on both the parent's classification level and their children's school attendance time (short, medium, or long). These solutions are also accompanied by initiatives aimed at helping employees during the summertime, when schools are closed. Employees were allowed to seek reimbursement for a fee (this year increased by € 25), based on their classification, for a week on campus utilised by

their children, up to a maximum of 3. In total, **687 weeks were reimbursed to 571 employees**. Continuing its commitment to support parenting and caregiving in general, in collaboration with Dr. Marco Squicciarini of Squicciarini Rescue S.r.l. and a team of physicians, paediatricians and Paediatric Basic Life Support instructors, Wind Tre organised **training sessions** on Paediatric De-obstruction and Resuscitation Manoeuvres and Lifesaving Manoeuvres for Adults, both in-person (at the RHO, Rome and Pozzuoli locations) and via live webinars. Wind Tre also assists employees with the expenses they have to incur for schooling, both through the **School Voucher**, which can be used to purchase school books at zero-interest monthly instalments deducted from their pay cheques, and through the **#schoolreward** initiative, a monthly bonus valid for one school year that's awarded to children who have achieved excellent results in their lower and upper secondary school courses. During the course of 2022, the first initiative was exploited by 217 employees, and the #schoolreward initiative awarded 63 bonuses to junior high school students, and 29 bonuses to high school students. In 2022, the company also continued its commitment to supporting those with personal or family social welfare needs through its **Al Tuo Fianco** initiative, for which further details can be found in the "Disability Inclusion" section.

Finally, through the **Wind Tre per Noi** platform, Wind Tre employees also have access to a series of benefits that they can utilise on a daily basis, such as consultancy services, online temporary shops, and special deals throughout the country.

These benefits are accompanied by **contractual benefits**, which are available to all employees regardless of location, level, and contract type (with the exception of the Telemaco supplementary pension plan, which is not available to employees with fixed-term contracts).

- Health Care:
  - Wind Tre Solidarity Fund + supplementary hospitalisation policy (non-executive staff);
  - FASI + Integrative Assidim (for Executives);
  - ALO (100% pay supplement for optional maternity leave).
- Insurance policy covering life and permanent disability from disease;

- Accidents Policy;
- Supplementary pension fund:
  - Telemaco Fund (non-executive staff);
  - Previndai Fund (for Executives).
- Telephone and SIM card for personal and work use;
- Employee promo for landline and mobile phone services;
- Contractual facilitations (e.g. paid hours of leave for medical appointments);
- Consultancy: taxes, social services.

In addition, Executives, technicians and sales-people are assigned company cars for personal and work use.

In order to facilitate a proper work-life balance, Wind Tre provides numerous wellness related services:

- In partnership with Doomore, Wind Tre has launched initiatives specifically designed to combine the maintenance of physical health with the pleasure of spending time together (e.g., Pilates, Yoga, Nutrition classes, etc.). A series of seminars on the topic of self-defence has also been launched;
- In partnership with Gympass, Wind Tre has incentivised the maintenance of physical health through contracted monthly subscriptions at over 2,100 facilities nationwide;
- With regard to caring for the elderly, Wind Tre has launched a promo to allow employees to purchase "Comarch ConTe" smart wristbands at discounted prices;
- The "Welfare Comete" psychological counselling service has been placed at the disposal of any staff members who would like to seek professional psychological support (to overcome feelings of anxiety, difficult situations, etc.). The service is available to employees and family members, and is provided by professionals (Psychologists, Pedagogists) with years of public and private experience in the field of managing critical situations. The first visit is covered by the company.



WIND TRE PER NOI

The platform throughout which Wind Tre employees can have access to a series of benefits and special deals



- The “Emotional Lab” webinar programme, in partnership with Bloom, was also concluded in 2022. This programme provided a space dedicated to personal development, in which each employee had the opportunity to explore their emotional dynamics, identify their defence and resistance mechanisms, expand their level of awareness, access their best internal resources, and unleash their creative and generative potential.

The Rome and Milan locations also have locker rooms and showers to facilitate engagement in physical activity.

Finally, the activity begun in 2021 that allowed for the possibility of borrowing corporate PCs and monitors at token prices, in the interests of reducing waste and facilitating work from home, was concluded in 2022. Under this programme Wind Tre also allowed a large number of ergonomic chairs to be borrowed at no charge.

### The “Welfare4Me” plan

The acclaim with which the 2020 and 2021 **Welfare Plans** were received prompted the company to establish new Welfare initiatives in 2022, including the possibility of transforming the Performance Bonus<sup>57</sup> into Welfare (with an amount able to be utilised at major consumer goods chains, or to reimburse school, university, or other family education expenses, transportation expenses, or expenses related to caring for seniors), and the amounts disbursed in July and December of 2022 to all employees

into Fuel Vouchers and other Purchase Vouchers. The goal of these initiatives is to support the company’s personnel with actions aimed at **improving their purchasing power during these difficult economic times**, due to the sharp rise in inflation.

### Occupational health and safety

Occupational Health and Safety<sup>58</sup> are a priority for Wind Tre, which has **instituted a dedicated in-house Management System** that complies with the most widely recognised international standards on the subject. With this System, the company aims to go beyond its legal obligations, by implementing the most virtuous practices and striving to constantly improve its results. In this regard, the Management constantly monitors Wind Tre’s performance through all the relevant indicators, in order to make any necessary corrections or changes to its Management System.

In this regard, in addition to the continuation of mixed-mode training through webinars, in 2022 in-person training sessions resumed on all matters that require practical tests to be performed (e.g., first aid, fire prevention, etc.). During 2022, a total of **1,784** employees underwent worker health and safety training.

As shown in the table below, the **incidence of accidents** remained quite low during 2022, maintaining the same level as the previous year, which was certainly also influenced by the ongoing pandemic.



**1,784**  
Employees who underwent worker health and safety training

Injury rate per million hours worked (no.)	2022	2021	2020	2019	2018
Employees (during work)	0.6	0.6	1.4	2.7	1.5
Suppliers (during work)	0.1	0.1	0.7	0.7	0.5
Employees (during travel)	0.2	0.3	1.0	4.7	3.7



<sup>57</sup> The company determines the Performance Bonus indicators and the conditions of disbursement to the employees on an annual basis, in agreement with the trade union representatives (OSS)

<sup>58</sup> The Workers’ Health and Safety certification pertains exclusively to the company Wind Tre S.p.A.





## MORE GREEN

Wind Tre has always been committed to making its operations more environmentally sustainable. It's about green challenges that cannot be postponed any more, and everyone must do their part, starting with companies. For years, we have been committed to **reducing our emissions and making more efficient use of resources**. We support the green and digital “twin transition”, which has been enabled by investments in **5G** and digital technologies, and is necessary in order to render our cities and **communities more sustainable**.

- Decarbonisation •**
- Smart technologies for society and the environment •**



**BACK TO SUMMARY**





# DECARBONISATION

GRI 3-3

According to the latest estimates of the International Panel on Climate Change, **the Member States' current policies aren't yet sufficient to slow the trend of global warming**: at this rate, a temperature increase of 2.7°C<sup>59</sup> is estimated by the end of the century, well above the 1.5°C limit proposed by the Paris Agreement, and confirmed by the recent COP27<sup>60</sup>. In order to help combat global warming and achieve a low-carbon economy that won't irreversibly damage the balance of the planet, every company must undertake to reduce the impact of the activities, structures and services that it offers in terms of CO<sub>2</sub> emissions. Technological innovation can be an important ally for every sector. For example, the digitisation of buildings and the use of smart control systems, could reduce CO<sub>2</sub> emissions by 350 million tonnes by 2050<sup>61</sup>.

According to a report issued by the International Telecommunication Union (ITU) and the

World Benchmarking Alliance (WBA)<sup>62</sup>, energy efficiency can play a key role in reducing electricity consumption, with more energy-efficient devices and data centres with improved power use effectiveness (Power Usage Effectiveness), and this can have a significant positive effect in terms of reducing Green House Gas emissions, or rather the so-called carbon footprint of the production process.

**The green and digital Twin transition is a process that's central to the European strategies for achieving climate neutrality by 2050**: In Italy, for example, digital technologies will contribute to 50% of the nation's decarbonisation over the next 30 years<sup>63</sup>. Companies must therefore devise strategies to reduce their emissions, especially those operating in the ICT sector, and must avoid them entirely wherever possible. They must also provide services that will increasingly allow customers to reduce their own emissions.

59 IPCC: *Climate Change 2021: The Physical Science Basis*, 2021  
60 United Nations: *Sharm El-Sheikh Climate Change Conference*, 2022  
61 Ispra: *Best Practices in Smart Cities*, 2021  
62 Greening digital companies: *Monitoring emissions and climate commitments*, 2022  
63 The European House-Ambrosetti: *Towards a net zero society*, 2021



The percentage of ICT companies worldwide that use renewable energy for their Data Centres  
(Capgemini, 2021)



The estimated global increase in greenhouse gas emissions from the ICT sector by 2025  
(Capgemini, 2021)



The tonnes of waste generated worldwide by electronic devices in 2021  
(World Economic Forum, 2022)

Out of all climate-altering emissions, the **greatest contributors are CO<sub>2</sub> emissions**. The best way to measure the CO<sub>2</sub> emissions attributable to an organisation is to break them down into three segments (Scopes):

- **Scope 1**: direct emissions from the organisation's activities (primary energy consumption and other gas emissions);
- **Scope 2**: indirect emissions related to the purchase of electricity;
- **Scope 3**: emissions from the value chain for the goods over which the organisation has influence.

**The environmental impact of the telecommunications industry**, which is currently responsible for about 1.4% of global carbon emissions<sup>64</sup>, is **expected to rise** with the increase in the number of devices and infrastructures for data transit. A TELCO operator's main impact lies in its energy requirements. In fact, the telecommunications network consists of a physical infrastructure that includes antennas and data centres, is powered by electricity, and needs to be cooled 24 hours a day to prevent the equipment from overheating. The telecommunications industry's emissions are concentrated within Scope 2, as they mainly consist of the purchase of electricity to operate the networks and the data centres connected to them.

## What it means to us



Constantly monitoring and improving our activities' impact on the environment



Modernising our nationwide network, to ensure continuous improvement in terms of energy efficiency



Making an active commitment to reducing the CO<sub>2</sub> emissions generated by the activities, facilities and services offered



Reducing waste and providing a sustainable working environment



Providing our customers with solutions to help them be more efficient and sustainable

64 La Repubblica: *Telco operators are on the front lines of environmental protection*, 2022

Our ESG goals



100% CARBON NEUTRAL  
Horizon 2030



MASSIMO MOTTA  
Sustainability  
Ambassador

Head of Technology  
Architecture & Governance

“We want to eliminate net CO<sub>2</sub> emissions  
(scope 1 and 2) by 2030”

COURSES OF ACTION

- Gradual increase in the purchase of **green energy**
- Renovation and construction of **solar plants** for the in-house production of renewable energy
- Continuous modernisation of the radio access network to ensure **maximum energy efficiency**
- Upgrade of the company car fleet o include low emission vehicles
- Offset of residual** CO<sub>2</sub> emissions

THE POINT WE'RE AT

- At the end of 2022 CO<sub>2</sub> emissions reduced by 25% compared to 2020, and by about 40% compared to 2017
- 13 proprietary solar power systems
- Collaboration on the recovery of the WWF oases closest to the company's headquarters
- Energy Supervisor: an ICT solution for the digital management of energy consumption and expenditures
- Two Urban Forests, with about 2,000 trees planted, in partnership with Arbolia
- Energy efficiency improvement of the company car fleet (180 hybrid or electric cars)
- Installation of 28 charging points for electric or plug-in hybrid cars

Zero emissions goal

GRI 305-1 GRI 305-2 GRI 305-5 GRI 203-1 GRI 302-1

At Wind Tre, over **95% of energy consumption is attributable to network infrastructure**, while just 2% of energy consumption comes from the offices, and the remaining 3% from fuel consumption for the corporate fleet.

The territorial capillarity of the network means that it is **mainly supplied by energy purchased from the national grid** and, to a lesser extent, by the **13 proprietary solar plants** and by several diesel generators for power outages or unserved areas. The same applies to the Wind Tre company facilities (offices, call centres and shops), which use electricity purchased from the grid and, to a lesser extent, methane to produce heat.

For years, Wind Tre has been committed to significantly limiting its energy consumption, thus helping to meet the challenge of energy

transition while continuing to ensure high infrastructure performance. In keeping with the previous years, in 2021 Wind Tre approved and launched **a plan to eliminate its carbon dioxide emissions (Scope 1 and 2) by 2030** through the commitment of a dedicated working group and the allocation of a specific budget.

The plan maintains Wind Tre's commitment to improving the energy efficiency of its equipment and infrastructures, to the progressive purchase of supplementary renewable energy and, finally, to offsetting any emissions that cannot be eliminated.

By the end of 2022, the plan had led to a **25% reduction in climate-changing emissions compared to 2020** (the year the plan was introduced). Compared to 2017, Wind Tre's first year, there has been a total reduction in emissions (Scope 1 and 2) of **approximately 40%**.



**2030**  
The year within which Wind Tre forecast to eliminate its carbon dioxide emissions

Wind Tre activities and structures that consume energy from fossil sources	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	Electricity purchased from third parties

Energy consumption (GJ) <sup>65</sup>	2022	2021	2020	2019	2018	GRI
Consumption of fuel from non-renewable sources	98,253	93,335	95,047	137,158	145,906	GRI 302--1a
Consumption of fuel from renewable sources	1,243	1,26	1,26	1,328	2,201	GRI 302-1b
Electricity consumed	3,106,735	2,981,856	2,864,670	2,927,882	2,955,123	GRI 302-1c i
Of which from renewable sources	919,243	436,86	1,26	1,328	2,201	
<b>Total</b>	<b>3,206,232</b>	<b>3,076,451</b>	<b>2,960,977</b>	<b>3,066,366</b>		GRI 302-1e

\* Other types of consumption are not applicable (GRI 302-1cii, ciii, civ, and d)

Greenhouse gas emissions (Tonnes of CO <sub>2</sub> eq.)	2022	2021	2020	2019	2018	GRI
Direct (Scope 1)	6,790.1	6,421.7	6,494.1	9,408.9	10,010.0	GRI 305-1 a-b
Indirect location-based (Scope 2) *	163,557.1	195,430.4	219,863.4	224,714.9	230,992.1	GRI 305-2 a-c
<b>Total</b>	<b>170,347.2</b>	<b>201,852.2</b>	<b>226,357.6</b>	<b>234,123.8</b>	<b>241,002.1</b>	
Direct (Scope 1) - including air-conditioning gas refills	1,327.92	2,187.4	3,867.0			
<b>Total including refills **</b>	<b>171,675.1</b>	<b>204,039.6</b>	<b>230,224.6</b>			
<b>Carbon intensity (ton CO<sub>2</sub> eq./TB)</b>	<b>0.016</b>	<b>0.021</b>	<b>0.029</b>			GRI 305-4

\*: Data on biogenic emissions (Scope 1) [GRI 305-1c] and indirect market-based emissions (Scope 2) are not applicable.

\*\*.: Emissions associated with air-conditioning gas refills are only available as of 2020; for comparability with previous years, these have been highlighted separately

65 Other types of consumption are not applicable (GRI 302-1cii, ciii, civ, and d)





With regard to the collection and analysis of the data on **Scope 3** emissions [GRI 305-3], or rather all **indirect emissions from resources not directly controlled or owned by the organisation but occurring within its value chain**, these are available for the years shown in the table.

The approach adopted to consolidate the Scope 3 emissions data is that of location-based operational control, with a specific methodology for each reference category<sup>66</sup>.

As an affirmation of its commitment to better energy use and reducing climate-changing gas emissions, as mentioned above (see the chapter entitled “More Responsibility”), in 2022 Wind Tre S.p.A. added **two new certifications** to its integrated management system. In fact, with the aim of pursuing increasingly efficient use of resources, Wind Tre S.p.A. has

set up an **Energy Management System** in line with the international **ISO 50001** standard. Special attention is paid to the reduction of the consumption values associated with the telecommunications equipment and the operation of the company’s locations, through a range of technological and management interventions. Wind Tre S.p.A. has also had its **Carbon Footprint**, an indicator that makes it possible to estimate the amount of greenhouse gases emitted directly and indirectly, certified by an independent third party, in accordance with the international **ISO 14064** standard, with the aim of identifying the main sources upon which to focus the activities aimed at reduce their impacts. The measurement is updated each year to verify the effectiveness of the measures implemented.

Greenhouse gas emissions (Tonnes of CO <sub>2</sub> eq.)	2022	2021
Scope 3*	736,848	693,042

\*: Data relating to biogenic emissions [GRI 305-1c] and market-based indirect emissions are not applicable.

## Energy efficiency projects

After the creation of the unified Wind Tre brand, the company became Italy’s leading telecommunications company and set itself the goal of **modernising the entire national network**, so that it would be energy efficient and ready to accommodate the latest technologies and services.

The **radio network equipment** has been replaced with the latest generation of energy-efficient equipment; the **equipment subject to variable operational loads** has been equipped with increasingly advanced energy-saving features; and the **infrastructures** in which the equipment resides have been modernised with exterior configurations that require lower levels of cooling energy.

The consolidation of the technology sites has led to the creation of a modern infrastructure

consisting of over 20,000 plants, which are capable of providing 2G, 3G, 4G, 5G and NBIoT services. These latter features are constantly being tested and optimised. **The radio base stations** and the large plants have been equipped with **Free Cooling** systems, which use external air to cool the equipment, thus reducing the air conditioning units’ energy consumption and extending their life cycle.

Once the modernisation and energy efficiency improvement of the entire mobile radio access network was completed, the company launched a project dedicated to monitoring and verifying its stations’ energy efficiency.

Thanks to the continuous automated analyses provided by the monitoring, the company is now able to determine the specific areas of intervention and the direct actions needed to

further improve its energy efficiency figures. In order to promote energy efficiency throughout the telecommunications network, a number of projects were launched in 2022, which, among other things, are aimed at limiting the increase in energy consumption due to the implementation of 5G technology (about 6% of energy consumption is expected to be saved once all the projects are completed).

The company is also developing an automated tool that will dynamically calculate where to intervene in order to re-route traffic, so that specific equipment can be placed on smart sleep mode while other equipment continues to provide service, thereby reducing infrastruc-

ture usage and saving energy.

In December of 2022, the topic of energy efficiency was the main focus of the **eleventh edition of the Company Talks programme**: a series of live streams on topics considered to be priorities by Wind Tre personnel, which are broadcast over the company’s intranet.

The occasion marked an opportunity for the company to lay out its energy saving projects and environmental sustainability strategies, and to analyse the Italian context.

The Energy Manager and the head of the Sustainability & Quality Certification department offered tips on how small daily gestures and habits can make a real difference both inside and outside the home.



66 For more details, see the paragraph entitled “Calculation criteria”

**MODERN INFRASTRUCTURES**

The company has modernized the national network also in energy efficiency perspective

# Together with WWF for the climate and biodiversity

Since its inception, Wind Tre has collaborated with WWF Italy on the topics of energy savings and reducing CO<sub>2</sub> emissions.

In 2021, in order to celebrate the achievement of the emission reduction goals agreed upon within the context of the partnership, the **Oasis Project** was born, to support the conservation of the protected oases; Wind Tre has symbolically given each employee 2 square metres of land located within the three WWF oases “closest” to three of the company’s main locations: the oases of Vanzago, Macchiagrande, and Astroni, which are respectively located near the Wind Tre offices in Rho, Rome, and Pozzuoli.

During 2022, the Oasis Project was enriched with **various engagement activities** for employees and their children and grandchildren, which led to the production of **an illustrated volume** in support of nature conservation and biodiversity, produced in collaboration with the WWF.

The book, which is titled “There’s a Caterpillar in the Forest”, begins with an original story by Federico Moccia, and includes drawings and answers to big and small questions by the children and grandchildren of the Wind Tre personnel who participated in the project’s initiatives, and was created with the aim of raising young children’s awareness of the need to

protect biodiversity and the environment. The book was presented during an event organised by the company at Palazzo Ferrajoli (Rome) during the Christmas holidays, which was attended by various stakeholders representing public institutions, the press, and the world of academia, all of whom were welcomed by Wind Tre CEOs, Gianluca Corti and Benoit Hanssen. It was also an opportunity to reiterate the company commitment to the implementation of its ESG projects, and led to the municipality of Lucca signing a memorandum of understanding to support the capital city of Tuscany’s transition to the smart city model. Within the context of its partnership with WWF Italia, **up until the end of 2022 the company also supported the #GenerAzioneMare campaign** created by the WWF to protect the landscape and animal species of the Mediterranean Sea, which, threatened by human activities and water pollution, has been defined as a “climate hot spot” by the United Nations, and is an


invaluable heritage site, not only for Italy, but for the entire planet. Wind Tre customers were able to contribute to the campaign directly by subscribing to the **Wind Tre and WWF for the Mediterranean** option and donating 50 cents each month. Wind Tre has pledged to double the amount donated, and donates all proceeds to the protection of the most endangered species in the basin, such as the loggerhead sea turtle (Caretta Caretta).


Wind Tre also participates every year in **Earth Hour, the largest global mobilisation coordinated by the WWF to combat climate change**, dedicated to raising public awareness of climate and energy issues. The day is dedicated to promoting sustainable lifestyles, and involves more than two billion people all around the world. Wind Tre promotes the initiative among its customers and employees through a dedicated web and social media campaign, even involving its own partners and points of sale.




*We thank Wind Tre for having decided to contribute to the larger project of WWF in Italy, that of the Oasis, supporting conservation activities of the areas closest to its main offices, those of Vanzago (Milan), Macchiagrande (Rome) and Astroni (Naples). Together, with these projects on the territory, we can change the trend of biodiversity loss and build a world in which man lives in harmony with nature.*

**BENEDETTA FLAMMINI**  
WWF ITALY







For more information on the book please frame the QR code



**#GENERAZIONEMARE**



## Wind Tre urban forests

By the end of 2021, Wind Tre’s collaboration with the benefit company Arbolia to promote environmental sustainability had resulted in the **creation of an urban forest with over 1,000 trees in the city of Taranto**. This partnership continued in 2022 with the creation of another urban forest with over **1,800 trees in the city of Treviso**.

The new greenbelt is located on Via Selvatico, on the southwestern outskirts of the city, and consists of a total of 1,809 different species of trees (including oak, linden, hackberry, and white willow) and shrubs (including dogwood, hazel, hawthorn, European spindle, and dog rose). The initiative will also provide for the maintenance of the new urban forest for the first two years. The new green area constitutes an important asset for the local community and, will absorb up to **270 tonnes of CO<sub>2</sub>** over 20 years, and up to 300 kg of PM10 per year, returning 197



UN NUOVO BOSCO URBANO PER **TREVISO**

Molto più vicini per un futuro più sostenibile



tonnes of oxygen into the environment in 20 years<sup>67</sup>. This is in addition to the results that will be obtained from the urban forest already planted in Taranto, which, will absorb up to **258 tonnes of CO<sub>2</sub>** over 20 years, and up to **2,506 kg of PM10** per year.

67 [www.arbolia.it](http://www.arbolia.it)



## Greener shops

Wind Tre has been carrying out **restyling initiatives among its stores** since 2021, **in order to make them more environmentally sustainable**.

The shops were outfitted with a new type of **LED lighting**, as well as a platform that monitors 15 parameters for each shop, in order to improve the quality of the air and the efficiency of the air exchange systems. This initiative continued with the introduction of a new electronic signature system (**OTP: One Time Password**), **which eliminated the need to print contracts**, the testing of a **SMART SCANNER document verification system, which will eliminate the need to photocopy customer documents** and retain a hard copy of their contracts, and the completion of the digital signage infrastructure at all the single-brand stores.

All these interventions are expected to lead in a significant reduction in paper consumption. The testing of the smart scanner continued in 2022, and the technology is expected to be introduced during the course of 2023.

In 2021, the sales consultants were also provided with new **eco-sustainable uniforms** made according to the OEKO-TEX Standard 100 criteria, a certification that attests to the quality of the materials utilised, and the eco-compatibility of the production process. Finally, in keeping with the positioning of the Wind Tre LUCE&GAS services, during the course of 2022 **Visibility Kits** (brochure holders, hardbacks, etc.) were produced for several store clusters in fully biodegradable and/or compostable materials with environmentally friendly water-based paint and cellulose acetate lamination.



## Green Logistics

With the aim of also optimising its environmental impact with respect to its transportation and logistics operations, Wind Tre **selected DHL as its partner**. DHL is a global leader and has been pursuing a clear strategy on Green Logistics for several years, with the aim of eliminating all logistics-related emissions by 2050.

DHL's commitments to Green Logistic are in line with Wind Tre's own objectives:

1. **To guarantee transparency** - To determine and monitor our carbon footprint in order to provide valuable information on the environmental impact of our transport and logistics operations;

2. **To optimise our environmental footprint** - DHL offers a range of service options to minimise and/or eliminate logistics related emissions, waste, and other environmental impacts throughout the supply chain. These solutions show potential for further savings on the part of Wind Tre;
3. **To offset emissions** - To invest in internationally recognised climate protection projects.

In 2022, DHL's Green Logistics approach was manifested through a number of important actions. These include the inauguration of the warehouse in Liscate, which is also

used for Wind Tre, the implementation of a geothermal and photovoltaic plant, and the use of over 90% of electricity from renewable sources, and adherence to the GoGreen Carrier Program, which is aimed at selecting increasingly sustainable transport providers. The company, which has adopted a specific energy management approach for all of its warehouses, renewed its ISO 14001 and ISO 50001 certifications in 2022, and earned the Logistics Operator of the Year Award for its Carbon Neutral Site Programme. Wind Tre carries out periodic updates with DHL on issues related to Sustainability, in order to monitor the progress of the proposed actions.

## Environmental awareness begins at the office

In order to reduce its impact on the environment, Wind Tre promotes various initiatives aimed at **improving the sustainability of the work environment** and reduce waste. These include:

- Installing automatic on/off systems for lights inside the technical rooms and offices;
- Replacing neon lights with LEDs in all company offices;
- Sharing offices using smart working methods in order to alternate between in-person presence at the office and working from home;
- Using AMA's ecological rating to monitor the Rome headquarters and the installation of Ecoboxes in all company offices;
- Using recycled paper and recyclable toner cartridges for printers in all locations;
- The installation of drinking water dispensers in place of plastic water bottles in the vending machines at the company's offices;
- The installation of building automation systems to regulate the use of air handling equipment based on the outdoor temperature.

Thanks to the improvement of the toilets' efficiency and the recovery of the excess water from the evaporative towers used for air conditioning, which is reused for irrigation, water consumption in offices decreased by about 33%, from 26,208 to 17,664 cubic metres, from 2021 to 2022.

To facilitate sustainable mobility, Wind Tre has 80 shared cars (car-pooling), of which 8 full electric and 20 hybrid, which each employee can access through a Corporate Car Sharing App. This service is available at the company's main offices in: Ivrea, Rho, Marghera, Rome and Pozzuoli. In total, by the end of 2022 **the company car fleet included 180 electric or hybrid cars<sup>68</sup>**, including carpooled cars. There are also **28 charging points** for electric or plug-in hybrid cars at the Roma Viola location, and 10 at the Rho location.

Finally, in 2022 the company provided all of its employees with digital business cards, which can be used directly from their smartphones. Thanks to a simple application, a QR Code provides access to the staff member's professional data, which are automatically updated in the event that their role within the company should change.



**180**  
Electric or hybrid cars within the company car fleet

<sup>68</sup> Total company car fleet as of 31 December 2022: 1,500 (12% electric/plug in)



# SMART TECHNOLOGIES FOR SOCIETY AND THE ENVIRONMENT

GRI 3-3

Smart technologies have a high potential in terms of social, economic and environmental impact. **The digital transition and green transition are two challenges that now go hand-in-hand**, bound by a common thread: this is the so-called Twin Transition, the two pillars that form the basis for decarbonisation. In fact, digitisation has the potential to facilitate the reduction of greenhouse gas emissions in various sectors, and to improve adaptation to climate change, while **the effective use of digital technologies can help dissociate growth from the use of resources**, thus strengthening circular business models<sup>69</sup>.

**By 2050, 70% of the world's population will be concentrated within cities<sup>70</sup>**, where approximately 2/3 of all energy is consumed each year, and where over 70% of the world's greenhouse gas emissions are generated<sup>71</sup>.

The digitisation of cities will therefore play a fundamental role in resolving the problems associated with increasing urbanisation, and will contribute to the decarbonisation process. These considerations have given rise to the **smart city** concept: a city model that makes use of connected and integrated technological solutions and systems capable of offering innovative solutions for smart and sustainable city management. **The advent of 5G and the improvement of the networks and infrastructures are a fundamental part of this process**. In fact, according to an analysis conducted by DLA Piper<sup>72</sup>, during the first quarter of 2020, **the 5G application with the greatest growth potential in the near future is precisely that of smart cities** (22%), followed by the IoT (16%), and media & entertainment (16%).

69 European Council: Council conclusions on Digitalisation for the Benefit of the Environment, 2020  
70 The World Bank: Urban Development, 2020  
71 IEA: Empowering Cities for a Net Zero Future, 2021  
72 DLA Piper, 2020. The study was conducted by interviewing 235 technology experts from the business sector and European government bodies



48%

The percentage adopted by utility companies for meters and smart grids of the more than 28 million “M2M” (machine-to-machine) SIMs existing in Italy (AGCOM, 2022)



\$90 BILLION

The estimated annual global added value generated by Artificial Intelligence by 2030, thanks to the improvement of the circular business models in the consumer electronics sector (Ellen McArthur Foundation, 2019)



350 MILLION

The tonnes of CO<sub>2</sub> emissions prevented worldwide by 2050 thanks to the digitisation and smart management of buildings (International Environmental Agency, 2021)

The smart cities and 5G compartment includes applications ranging from air quality, energy use, and traffic pattern monitoring, to street lighting, smart parking systems, management of crowd flows, and emergency response. **In Italy, this is already evidenced** by the increased use of Machine-to-Machine (M2M) sim cards, the specific purpose of which is to allow for communication between machines.

The use of these types of sim cards, which serve as an indicator as to how widely diffused “smart” equipment is within Italy, has increased steadily over the past decade, reaching 28.08 million units at the end of 2021, with utility applications, including smart meters, taking first place (48.8%)<sup>73</sup>.

## What it means to us



Collaborating with the institutions to meet the growing demand for urban recovery and resilience solutions



Stimulating discussion on the impact that technologies will have on the future of cities and the environment



Enabling innovative services for the digital and ecological transition with our technologies



Reaping the benefits of process digitisation and enabling our customers to do so as well

73 AGCOM, 2022 Annual Report





Our ESG goals



SMART PARTNER OF 100 SMART CITIES  
Horizon 2030



“We want to support local Administrations in transforming their municipalities into smart and sustainable cities”

**STEFANIA MATRONE**  
Sustainability Ambassador  
  
Head of Transformation & Development Office

COURSES OF ACTION

- **Screening of the relevant cities** and identification of their needs
- Identification of possible solutions and verification via a **technical and economic feasibility test** (POC - Proof Of Concept)
- Contact with local PAs, **round tables** with Consumer Associations and PAs, participation in local innovation hubs, like the Case delle Tecnologie Emergenti (“Houses of Emerging Technologies” - CTEs), and sponsorship of relevant events
- **Educational programme** to help the PA implement new skills and technologies like 5G, Data Science and Cloud

THE POINT WE’RE AT

- Establishment of memoranda of understanding aimed at supporting local governments during the digital transition: 7 Italian cities have signed the protocol
- Development of a portfolio of innovative services based on Big Data Analytics, Mass Alerting, and IoT applications.
- Support for the CTEs in l’Aquila and Rome
- Renewal of membership in the “Federated Innovation @MIND” programme in Milan and the CAMPANIA Digital Innovation Hub (DIH)
- Support for local government administrations at major events: Modena Smart Life, the Earth Technology Expo, and the 39<sup>th</sup> Annual Assembly of the ANCI

Solutions designed to make cities more digital and sustainable

Aware of the impact that technologies can have for the promotion of the digital transformation and sustainability from a Smart City perspective, in 2022 Wind Tre shored up its **B2G (business-to-Government) proposition to provide a concrete response to the growing demand for urban digitisation and resilience solutions**, with a particular focus on schools and projects aimed at improving transport, tourism and retail services.

Within the context of the “**smart cities**” project, which is part of the company’s ESG Plan, the company has established a model to support municipalities during the digital and sustainable transition, and has created a multi-disciplinary team to help guide their progress. A model that begins with listening, sharing, and transferring skills, and culminates in the development of concrete trials. In this regard, the company signed memoranda of understanding with **7 Italian cities** in 2022, with just as many planned for 2023.

Wind Tre’s service portfolio, which also includes partnerships with innovative ICT companies, offers various types of solutions:

- **Big Data Analytics for transport, tourism, and business:** the web dashboard designed for those involved in planning, management and analysis for urban mobility, tourism or business, which is capable of analysing people’s movements in specific areas of interest in a simple and effective way, based on anonymous data from millions of customers and processed by sophisticated algorithms created ad hoc.
- **Mass Alerting:** a Software Platform for managing both emergency and routine communications. The platform allows alert messages to be sent to recipients located in specific areas of the country, which can be configured directly on the map or imported from Civil Protection plans (risk areas), with multichannel communication management across all modern media,

including social networks, Telegram, smartphone apps (weather, tourism, etc.), various message boards, and the nationwide IO app.

- **IoT services:** the term Internet of Things (IoT) refers to a series of connected applications and services (M2M), which typically consist of fixed installations connected via the 5G NB-IoT network. Examples of IoT services include **Video Surveillance** systems, with Smart Cameras capable of recording not only images, but also information about the situations they monitor (metadata). The possibilities include counting the number of people in a given area, reading vehicle license plates, and measuring spaces and encumbrances. When properly transmitted to a Control Room in real time, these data allow for the immediate management of any hazardous or emergency situations that may arise. Another example of an IoT solution is **Environmental Monitoring** using sensors that measure the levels of pollutants in the atmosphere. **Traffic and Parking management** involves the measurement of urban traffic flows and parking occupancy status, the use of the collected data to prevent congestion, the dynamic management of traffic light systems, and the reduction of the time needed to find parking. Finally, **Public Transportation management** involves locating means of public transportation in order to provide information on waiting times and improve traffic flows.

- **Easy Wi-Fly and digital boards for schools:** an innovative service to provide scholastic institutions with Wi-Fi networks that are capable of linking the educational and administrative areas of the schools themselves, rendering them available online and shareable by the entire teaching staff. Via a **portal that’s customised** for each school, the students, teachers and all the school staff can use the Easy Wi-Fly data



**EASY WI-FLY**  
Students and teachers can use the Easy Wi-Fly data connection as to access the Internet free of charge, and in an entirely secure manner



*Thanks to the partnership with Wind Tre, Lucca can finally start watching to a future built on innovation and environmental sustainability, focusing on specific projects and on the recruitment of a selected team of experts of the territory, capable of presenting new digital services for the population in the logic of 'smart cities', where everything is connected and everyone forms a system, for finally allow our city to keep up with the times.*

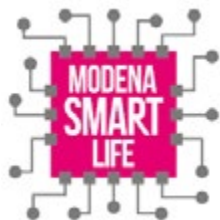
MARIO PARDINI  
MAYOR OF LUCCA

connection to share all the school's connected resources, as well as to access the Internet free of charge, and in an entirely secure manner, thanks to the solution's full compliance with the regulations. In addition to the typical connectivity services and Internet access, the solution also provides for new and innovative ways of sharing and collaborating, thanks to the inclusion of digital whiteboards. In addition, it is also possible to quickly create and modify the database of users with access to the various types of communications; information campaigns, with text messages/e-mails or push notifications being sent out for specific or recurring events;

services for teachers and students, such as tutorials and online tools, and access to e-books and Web pages with certified content, available on any type of device (Smartphones, Tablets, PCs, Laptops, etc.).

Wind Tre's portfolio of smart services also includes the **Energy Supervisor** service: an ICT solution for reducing energy consumption and spending (see the following chapter), in order to reduce the costs incurred by companies and public administrations, as well as the relative and environmental impacts.

## Assisting local governments in the digital transition



Wind Tre continues to work hand-in-hand with local governments and their institutional representatives to extend, strengthen, and modernise digital infrastructures, as well as to enable the dissemination of new technologies. In fact, digital technologies, big data, analytics, the IOT, and the 5G network are enabling factors for many of the services designed to improve the environment, the health of citizens, and the local administrations.



Various initiatives have been carried out in support of local Administrations in order to promote the use of technologies at the service of citizens and the territory, and to stimulate an increasingly broad and inclusive digital culture. In 2022, Wind Tre once again supported local Administrations as an institutional sponsor for several major events: **Modena Smart Life**, **Earth Technology Expo**, and the **39th Annual As-**

**sembly of the ANCI**, the National Association of Italian Municipalities. During the **Modena Smart Life** digital culture festival, in collaboration with the Municipality and the Collegio San Carlo Foundation, Wind Tre had the opportunity to hold a round table discussion with administrators from the Municipalities, the Province, and the City of Modena itself, in order to illustrate the "Smart cities" and "Borghi Connessi" ESG projects, which were well received, thus allowing the company to lay the groundwork for future collaboration projects. During the **Earth Technology Expo in Florence**, Wind Tre had the opportunity to demonstrate its solutions for urban digitisation, presenting its experience with the Viola Park project, and within the context of various new technological challenges aimed at achieving "digital sustainability."

The **39th Annual National Assembly of the ANCI**, held in Bergamo, also served as an opportunity for Wind Tre to illustrate its sustainability projects to the administrators in attendance, through two dedicated workshops: **"Smart cities: it's time to take action"** and **"Borghi Connessi: projects and opportunities for the digitisation of local areas and small municipalities."** The assembly was also the venue for the official signing ceremony of the "Smart cities protocol" between Wind Tre and the Municipality of Codogno, represented by the town mayor, which will serve as an opportunity for institutional and technical dialogue, in order to determine the digital needs of the municipality and its citizens.

In addition to these important opportunities for discussion and exchanging ideas, in 2022 Wind Tre also supported several Administrations in carrying out the **Homes of Emerging Technologies** projects. These projects are carried out in association with the Support Programme for Emerging 5G Technologies launched by the Ministry of Enterprise and Made In Italy (MIMIT), which funds the creation of local technology transfer centres aimed at supporting research and trial projects for SMEs and start-ups involving the use of Blockchain, IoT, and artificial intelligence, which are linked to the development of the next-generation 5G networks. Wind Tre supported the candidacies of as many as 6 municipalities out of the 20 that participated in the MIMIT 2022 selection process, for which the Municipality of Cagliari was among the winners, with Wind Tre being a project partner. Wind Tre has also continued to provide support to a number of the HETs already active throughout the country. These include that of the Capitoline Administration, which is dedica-

ted to improving tourism and mobility through the use of innovative technologies, and that of the city of L'Aquila, where Wind Tre supports the SICURA HET via a connectivity project. The company's institutional focus on dialogue and discussion with local administrations is also expressed through its **Managing Directors' involvement** at the highest levels, who, once again in 2022, initiated meetings with the municipalities' top officials in order to further strengthen Wind Tre's relations with local government bodies, especially on issues relating to technological and digital development. Among of the most significant of these meetings were those held in Genoa, Lucca, and Ascoli Piceno, and it was the latter that Wind Tre supported as a candidate for the Italian Capital of Culture for 2024 (A&P2024). In fact, Wind Tre sponsored 9 events dedicated to the territorial, artistic, cultural, and landscape enhancement of the Ascoli Piceno area, with approximately 30 hours of conferences and meetings being held both inside and outside the company to set up and promote the programme, and a press conference being held to sum up the project.

Finally, Wind Tre was a partner of the **"5G Italy"** event, now in its fourth edition, in which political, regulatory, research, business, economic, and local government figures all come together to discuss the challenges and opportunities of 5G. The conference was dedicated to a technology that will provide the connectivity and services needed for Italy's digital transformation, and addressed several topics related to 5G, such the potential positive impacts in every sector, including agriculture, business, defence, energy, finance, industry, media, public administration, health, safety, transport, and tourism.





# Together for innovation

GRI 203-2a

During 2022, Wind Tre reaffirmed its commitment to promoting technological research and dissemination activities by renewing its partnership with ZTE: a leader in the fields of telecommunications and 5G technology, with particular regard to the use of the **ZTE Innovation & Research Centre (ZIRC)** in the town of L'Aquila. As part of the **Tecnopolo d'Abruzzo** technology hub, the ZIRC laboratory hosted the 5G experimentation, and intends to promote future innovative projects for the capital city of the Abruzzo region, such as the SICURA project associated with the Ministry of Economic Development's Casa delle Tecnologie Emergenti (CTE) tender, and the EXTENSION project associated with the ESA cultural tender.

Also within the context of the first **Home of Emerging Technologies** tender launched by the Ministry of Economic Development, Wind Tre has maintained its commitment in relation to the agreement signed in 2021 as a Corporate Partner with the City of Rome. Once again in 2022, the aim of the partnership is to support the creation of an **Open Tech Lab** at the Tiburtina Train Station in order to facilitate collaboration between companies, start-ups,

research bodies, Universities and Public Administrations, and to experiment with innovative services that will be useful to citizens and local businesses from a smart city perspective. Wind Tre challenged the Open Tech Lab's participants to come up with **a way to combine 5G technology with Blockchain, IOT and Artificial Intelligence functionality to generate services aimed at improving mobility throughout the city**. As part of this process, Wind Tre organised the following two Workshops at Tiburtina station dedicated to start-ups, SMEs, and the local administration, with the aim of stimulating in-depth analyses of technologies and tools useful for the digital development of the local territory: "5G for the New Digital Frontiers" and "Big Data, Analytics and Opportunities". One of the possible areas where these technologies could be applied is in the development and implementation of **new transport ticket management models**, such as pay-per-use models associated with the routes actually travelled, and new digital payment models that can even be linked to the use of mobile phone credit. All the routes on city lines covered by 5G can be easily calculated, even with the aid of optimisation algorithms if necessary, and in-



tegration with digital payment systems will allow the use of paper tickets to be eliminated. In 2022, Wind Tre also reaffirmed its participation in the **Federated Innovation@MIND** programme (a public/private partnership model conceived at MIND – the new innovation district established at the former EXPO site in Milan), where it collaborated with other well-known partners to create a classroom of the future, in order to show how the use of digital technologies and the IoT, together with new teaching practices, can help make schools more resilient and can bridge the gaps of the digital divide for less fortunate parts of the country. The programme offers the opportunity to help improve communication and collaboration between students and teachers, and to monitor environmental quality parameters. Wind Tre also participates in the **CAMPANIA Digital Innovation Hub (DIH)**, a consortium

company whose vision is to create an innovative collaborative network made up of Industrial Companies, Research Centres, and other institutional players, in order to establish the new Industry 4.0 paradigm. As part of this initiative, Wind Tre intends to provide people, businesses, and the territory with the tools needed to tackle the new challenges posed by the digital transformation, thus bridging the gap between the digitisation needs of industries and the feasible solutions. Finally, through Asstel (a Confindustria trade association), Wind Tre promoted the **Smart School** project, which proposes a single comprehensive solution to meet the needs of students, teachers, school managers, families, the Ministry of Education, Universities and Research Institutes alike, for a digital school model that provides users with a simple, economic, and efficient tool.

## Energy Supervisor for Energy Efficiency

In order to ensure a constant reduction in CO2 emissions, Wind Tre does not just limit itself to improving its own processes, but supports its customers' commitments to reducing their emissions and energy consumption as well, starting with companies and the Public Administration.

In this regard, the company launched its **Energy Supervisor service: an ICT solution for the digital management of consumption and energy expenditure**.

Developed in collaboration with Ouvert, a leading Italian company with decades of experience in the field of energy performance analysis and management, the service is used by Top and Large segment Companies in the Retail Industry to analyse and control energy costs and consumption (electric/water/gas), to establish energy efficiency recovery strategies, and to validate the relative actions taken, all through a 100% cloud-based solution that uses all the most advanced Machine Learning tools.

This tool **allows customers to plan energy efficiency measures** in a more targeted way, identifying energy drivers and optimising performance.

The service is available in three different formulas, one for every need:

- **Monitoring:** Includes monitoring, data collection and reporting of energy consumption;
- **Invoicing:** The process digitisation service for checking and recalculating energy supply invoices;
- **Analysis:** Generates reports based on energy consumption indicators, as well as financial and administrative indicators, in order to help plan the energy budget.



**ENERGY SUPERVISOR**  
The ICT solution for the digital management of consumption and energy expenditure

**OPEN TECH LAB**  
A laboratory to facilitate collaboration between companies, start-ups, research bodies, Universities and Public Administrations

## Electromagnetic emissions under control

Wind Tre **constantly and attentively monitors its plants to ensure that they generate electromagnetic emissions below the stringent limits** set by the Italian legislation (an average daily value of 6 V/m in heavily frequented areas).

The checks carried out for both the new and existing plants entails the preventive monitoring of the electromagnetic emissions. Once the authorisations have been acquired from the competent bodies (ARPA, Municipality, Superintendencies, etc.), Wind Tre checks the meters with constant attention to ensure that the equipment does not exceed the power and emission levels established for the area of reference.

As of 2015, Wind Tre **publishes on the websites of the regional ARPAs the monitoring data** of its installations to which the regulation

of 02/12/2014<sup>74</sup>, which requires the verification of the hourly and daily average power, applies. It is widely known that the current electromagnetic limits (EMF limits) in Italy are significantly lower than those in the rest of Europe (6 V/m as opposed to an average of 40-61V/m). Since the epidemiological studies conducted to date have found no causal links between diseases and electromagnetic emissions, Wind Tre is seeking to obtain a regulatory change aimed at adjusting, or at least increasing, the EMF limits established under Italian law, thus facilitating the full development of the 5G networks and all the relative services. This issue is apparently a cause of concern among the political class due to possible social implications, committee protests, etc. However, if these limits remain unchanged, this will undermine the returns on investment, which will tend to diminish, thus further defeating the purposes of the NRRP.

## Partnership with Italgas

In 2021, Wind Tre has launched a partnership with Italy's leading gas distributor, Italgas, to support the digitisation of its entire gas network, by leveraging the company's NB-IoT skills. The custom solution developed provides for a SIM/IoT connection, a private APN, and a management platform, in order to allow for the secure transmission of data

from the Italgas network to the data centres. This system has allowed Italgas to monitor its network operations in real time, manage alarms, carry out big data analyses, and perform predictive maintenance. It has also enabled the remote reading of gas consumption, in order to reduce the need for Italgas personnel to travel and take the readings in person.

<sup>74</sup> 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)

## Close the circle

With the aim of making the use of resources increasingly efficient Wind Tre has introduced the **"green" SIM cards**<sup>75</sup>. Wind Tre SIM cards are produced by Thales, a leading manufacturer of Eco-SIM cards, they are 50% smaller than standard one and made in **100% recycled plastic**, with a production process that generates zero CO<sub>2</sub> emissions.

Via a wide-reaching network of over 500 centres throughout the country, Wind Tre offers a broad and comprehensive range of after-sales services for devices, guaranteeing prompt and excellent quality repairs using original spare parts, even with the aim of reusing the product and extending its service life.

The goal is to **improve customer satisfaction and to extend the life cycle of the devices** themselves by providing options for customers to reuse and repair their products.

In over 60% of cases, Wind Tre replaces non-functioning modems with pre-owned products that have been refurbished by specialised companies, thus allowing fixed network customers to obtain perfectly functional products, while at the same time limiting the production of electronic waste. **In 2022 alone, a total of about 38,000 Modem products were refurbished for consumer customers.**

Similarly, a kasko service is provided for mobile business customers, which, in 74% of cases, allows them to replace their faulty smartphone with a refurbished one. **In 2022, about 5,000 smartphones belonging to Business customers with the Kasko service were refurbished.** In both cases, the faulty product exchanged can often be subsequently reconditioned and reutilised as a new replacement.

For mobile consumer customers, Wind Tre has partnered with Bolltech to offer its **Reload** services, which offer the possibility of replacing the customers' smartphones with refurbished or repaired products

These services are offered via the business partner Bolltech device protection (Italy) S.r.l., and, for a small monthly fee, allow customers to replace their Smartphones with new or refurbished grade A models (i.e. semi-new or



like new), with delivery in 1 just business day in major cities (Rome, Milan, Naples, Turin, Genoa, Bologna, Florence and Bari).

In July of 2022, thanks to a partnership with Enjoy, a company specialising in this field, Wind Tre added **refurbished smartphones** to its device portfolio. **The refurbished models are available with all the Wind Tre mobile offers, even with instalment plans.**

The selection of a refurbished device offers **numerous benefits for both the user and the natural environment**. For the user, in addition to being particularly cost-effective thanks to the discounted sale price, it is also a safe choice. In fact, in addition to being refurbished and sanitised, the smartphone also undergoes a series of preventive tests, and is subjected to a thorough final hardware and software inspection to certify its compliance with the market quality standards. From an environmental perspective, choosing a refurbished smartphone not only limits CO<sub>2</sub> emissions with respect to a newly manufactured device, but it also limits the mining of rare minerals, mainly used for motherboards and batteries, and consequently also reduces WEEE, or rather the waste materials generated by electronic devices that need to be disposed of.

Finally, in October of 2022 Wind Tre launched its new trade-in service called **"Reload exChange"**. With Reload ExChange, Wind Tre customers can trade-in their used phones at Wind Tre stores and receive cash payments of up to € 800 directly in their bank accounts,



**5,000**  
The smartphones belonging to Business customers refurbished through the Kasko service

<sup>75</sup> Sim only for "human" customers, "green" sims cannot be used for Machine to Machine (M2M) connections





depending on the smartphone returned. The evaluation of the used smartphone is carried out directly in-store via a diagnostic app, which provides a quote of the used phone's value within minutes. In addition, customers who subscribe to the Reload exChange service can purchase a new smartphone at a special price. The launch of the new service was promoted with digital and social media campaigns, and was boosted by TV spots and new digital campaigns. The service is provided by Wind Tre in partnership with Bolttech Device Protection (Italy) s.r.l.



## WINDTRE LUCE&GAS powered by Acea Energia

In January of 2022, the partnership between Wind Tre and Acea Energia was extended nationwide to include nearly 3,000 WINDTRE outlets in the promotion and marketing of "WINDTRE LUCE&GAS Powered by Acea Energia" offers.

The electricity is "Guarantee of Origin" certified (an electronic certification attesting to the **renewable origin of the sources used for the production of electricity**, in compliance with the regulations established by ARERA Resolution ARG/elt/104/11, as amended). The marketing of the **zero CO<sub>2</sub> gas** offers began in March of 2022. The CO<sub>2</sub> emissions of the gas is offset through the purchase of certified carbon credits, which help fund and support

mitigation projects that have concrete benefits for local communities.

Since all WINDTRE LUCE E GAS offers have "**Electronic Billing**" included, 94% of customers in 2022 received their bills in digital format, thus reducing paper waste and the CO<sub>2</sub> emissions associated with both printing and delivery. During the course of 2022, the brand strengthened its presence on the Consumer market by also focusing on convergence with an additional benefit for all customers who activate fixed-line phone offers, and even extended its offers to include the Microbusiness market in order to provide freelance customers with a dedicated offer as well.



## VERY MOBILE: Green SIM cards and refurbished mobile phones

Very Mobile<sup>76</sup>, a brand owned by CK Hutchison Holdings Ltd. group (to which Wind Tre S.p.A. also belongs), has always been attentive to environmental issues, and at the end of 2021 became the first semi-virtual operator to launch an eco-sustainable SIM card on the market. Available to those who purchase in-store, online, and by calling the toll-free number 1929, the eco-sustainable SIM card is 50% smaller than a standard SIM, and is made with 100% recycled plastic, using a production process that eliminates CO<sub>2</sub> emissions<sup>77</sup>.

Awareness of 'green' issues has been part of the Very brand's DNA since its inception in 2020. This environmental awareness journey consists of numerous activities, including the creation of the [verycreativi.it](http://verycreativi.it) website, which allows anyone to express themselves creatively online without marking up the walls of the city, the cleaning of Schuster Park in Rome, in collaboration with Legambiente, and the development of a poster capable of purifying the air thanks to a special fabric, which was installed in Genoa in December 2020. Very Mobile was also the first semi-virtual operator to have launched eSIMs, which allow users to activate service plans without having to physically insert SIM cards into their smartphones

On 14 February 2022, Very also launched the sale of **refurbished smartphones** on its website, in partnership with the Austrian company *refurbed*<sup>TM</sup>. In addition to being convenient and eco-sustainable, refurbished smartphones also provide for considerable savings in terms of both money and CO<sub>2</sub> emissions; moreover, with each smartphone purchased, the customer receives an eco-friendly cover free of charge, and tree is planted in Madagascar, Haiti, Nepal, Mozambique, Kenya or Indonesia. In January of 2023, Very further reaffirmed its commitment to the environment with the launch of **Giga Green**, the **entirely free** programme that allows Very customers to transform the gigabytes of data they consume each month into "Green Gigabytes," which can be used to help support eco-sustainable and environmental protection projects throughout our country. The programme can be found in the dedicated section of the Very app, where customers can choose how to use their converted Gigabytes by voting for various environmental protection projects in Italy, ranging from cleaning beaches and seabeds, to reforesting areas stricken by natural disasters. Very will periodically carry out the projects that receive the most votes with the support of specialised partners, with new ones being added over time.

<sup>76</sup> Very Mobile, a brand of the CK Hutchison Holdings Ltd. Group which is totally managed by Wind Tre, is for this reason considered in the reporting

<sup>77</sup> The plastic with which this new SIM card is made comes from the polystyrene recovered from refrigerators disposed of by consumers, or rather the white plastic contained inside them, which is transformed into raw material and used to make the "finished" SIM card

# The origins of this document

GRI 2-14

The Sustainability Report demonstrates, year after year, Wind Tre's commitment to reporting and communicating the Group's environmental, social and governance performance to its stakeholders, confirming a practice already established since 2003.

The information contained in this report refers to the 2022 financial year (1 January – 31 December), and is compared to the relative 2021 and 2020 information, as well as the 2019 and 2018 information, wherever possible. 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. The entities included in the financial statements correspond to those taken into consideration for this sustainability report, and the approach adopted to consolidate the information was that of operational control. [GRI 2-2].

This document has been drawn up in accordance with the 2021 Global Reporting Initiative (GRI) Standards, which are the most widely used international standards for sustainability reporting today.

The content's correspondence with the requirements of the GRI Standards is indicated in the text by a series of identification codes starting with GRI, which appear in square brackets.

In accordance with the 2021 GRI Standards, the 2022 edition of Wind Tre's ESG Report is centred around the 7 material topic identified through the materiality analysis. In particular, the GRI defines material topics as topics useful for representing the economic, environmental

and social impacts generated by the organisation and, therefore, capable of impacting its decisions and those of its stakeholders.

The GRI Content Index lists together with the material topics, all the information reported by the company according to the requirements of the 2021 GRI Standards and their location within the report.

The contents of the Sustainability Report were obtained through a collective effort, in which all the Wind Tre departments participate every year, with each gathering the most relevant information relating to its activities and approving the final version of the document with a complete and accurate information flow, which guaranteed the reliability of the reporting model adopted. The External Affairs & Sustainability Department coordinates the project, thus ensuring consistent results.

The final document is approved by the Director of the function, shared with the Management Team, the highest governing body of the Wind Tre group, and sent for viewing to all members of the BoD.

The GRI Content index can be found at the end of this document. The Sustainability Report is available on our website [www.windtregroup.it](http://www.windtregroup.it). For any further information or clarifications you may require, please contact the Wind Tre External Affairs and Sustainability Department at the following addresses:

**Wind Tre S.p.A.**  
L.go Metropolitana, 5 - 20017 Milano-Rho  
Via Cesare Giulio Viola, 48 - 00148 Roma  
External Affairs & Sustainability





GRI content index

Wind Tre has submitted a report compliant with the GRI standards for the period from 1 January 2022 to 31 December 2022.

GRI 1 – Fundamental Principles – 2021 version

GRI Standard	Disclosure	Location	Omission
General Disclosures			
GRI 2 General Disclosures 2021	2-1 Organisational details	The corporate structure (p. 17)	
	2-2 Entities included in the organization’s sustainability reporting	The corporate structure (p. 17) The origins of this document (p. 144)	
	2-3 Reporting period, frequency and contact point	1 January 2022 - 31 December 2022 (same period as the cash flow statement) publication date may, 2023	
	2-4 Restatements of information	There have been no significant changes with respect to the previous edition	
	2-5 External assurance	“To date, the company has not adopted an internal policy that involves the highest governing body in the pursuit of external assurance, but the choice of the auditing firm is shared with the Director of External Affairs & Sustainability, which is the only department involved in the selection process. Assurance Statement (p. 152)	
	2-6 Activities, value chain and other business relationships	About Us (p.14) Business ethics and integrity (p.40) There have been no significant changes with respect to the previous edition	
	2-7 Employees	The Wind Tre team (p.112)	
	2-8 Workers who are not employees	The Wind Tre team (p.112)	
	2-9 Governance structure and composition	The corporate structure (p.17)	
	2-10 Nomination and selection of the highest governance body	The corporate structure(p.17)	
	2-11 Chair of the highest governance body	‘Fok Kin Ning Canning (Chairman of the Board of Directors) does not hold an executive role in the company	
	2-12 Role of the highest governance body in overseeing the management of impacts	The sustainability governance model (p.33) - On a periodic basis (every quarter), the External Affairs & Sustainability director reports to top management, including the co-CEOs and the Finance director, on the progress of all the indicators included in the plan, the main activities carried out, and any critical issues encountered. The annual results of the plan KPIs included in the management incentive plan (normally at least one KPI for each goal) are brought to the shareholder for approval.	
	2-13 Delegation of responsibility for managing impacts	The sustainability governance model (p. 33)	
	2-14 Role of the highest governance body in sustainability reporting	The sustainability governance model (p. 33) The origins of this document (p. 144)	
	2-15 Conflicts of interest	Fight against corruption and conflicts of interest (p. 44)	
	2-16 Communication of critical concerns	Governance instruments (p. 42)	
	2-17 Collective knowledge of the highest governance body	The sustainability governance model (p.33)	

GRI Standard	Disclosure	Location	Omission
General Disclosures			
GRI 2 General Disclosures 2021	2-18 Evaluation of the performance of the highest governance body	The sustainability governance model (p.33)	
	2-19 Remuneration policies	The sustainability governance model (p.33)	
	2-20 Process to determine remuneration	The remuneration proposals for co-CEOs, Senior Executives (first line of co-CEOs and second line of co-CEOs), are structured based on external benchmarks (independent supplier Willis Towers Watson) without the participation of a committee, and submitted to the shareholder (CKHH) for its final approval. For all other employees, the remuneration policy is managed between the Human Resources Department and the department managers (subject to the approval of the CEO’s and always within the limits of the defined budget perimeter)	
	2-21 Annual total compensation ratio		OMISSION: CONFIDENTIALITY CONSTRAINTS: Information not disclosed for confidentiality constraints as it is believed to fall into the category of information subject to the “Policy for the classification and management of confidentiality information”.
	2-22 Statement on sustainable development strategy	Letter to the stakeholders Our model (p.2)	
	2-23 Policy commitments	Governance instrument (p. 42)	
	2-24 Embedding policy commitments	Governance instrument(p. 42)	
	2-25 Processes to remediate negative impacts	Stakeholder and relevant topics (p. 27) The pursuit of shared solutions (p. 77)	
	2-26 Mechanisms for seeking advice and raising concerns	Whistleblowing (p. 45)	
	2-27 Compliance with laws and regulations	Compliance with laws and regulations (p. 46)	
	2-28 Membership in associations	<ul style="list-style-type: none"><li>ASSTEL, the Confindustria organisation that represents telecommunications companies (Wind Tre actively participates in the tables to define the positioning of the sector on various topics)</li></ul> <p>Furthermore Wind Tre participates in:</p> <ul style="list-style-type: none"><li>CONSEL, the ELIS Consortium for higher professional training, whose primary goal is to support young people in their transition to the world of employment</li><li>United Nations Global Compact - Italian section</li></ul>	
	2-29 Approach to stakeholder engagement	Stakeholders and relevant topics (p. 27)	
	2-30 Collective bargaining agreements	The contract offered to all the company employees has been negotiated with the trade unions, and is applied to 100% of workers	

GRI Standard	Disclosure	Location	Omission
General Disclosures			
GRI 3 Material Topics	3-1 Process to determine material topics	Stakeholders and relevant topics (p. 27)	
	3-2 List of material topics	Stakeholders and relevant topics (p. 27)	
	3-3 Management of material topics	Stakeholders and relevant topics (p. 27) Child protection in the digital domain (p.54) Cybersecurity and Privacy (p.62) Digital Divide (p.82) Inclusion of disabilities (p.94) Lifelong digital learning (p.104) Decarbonisation (p.122) Smart technologies for society and the environment (p.132)	

Specific standards				
GRI Standard		Disclosure	Location	Omission
Child protection in the digital domain				
GRI 418 Customer privacy		418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Personal data protection (p. 67)	
Cybersecurity and Privacy				
GRI 203 Indirect economic impacts		203-1 Infrastructure investments and services supported 203-2 Significant indirect economic impacts	Increasingly resilient (p. 65)	
Digital Divide				
GRI 203 Indirect economic impacts		203-1 Infrastructure investments and services supported	Digital Divide (p.82)	
Lifelong digital learning				
GRI 404 Training and education	404-1 Average hours of training per year per employee		Lifelong digital learning (p. 107)	
	404-2 Programs for upgrading employee skills and transition assistance programs		Lifelong digital learning (p. 107)	
	404-3 Percentage of employees receiving regular performance and career development reviews		100% of the employees are engaged in annual performance development, which not only assesses employee performance, but also includes the assignment of a personal development plan	
GRI 203 Indirect economic impacts		203-1 Infrastructure investments and services supported	Lifelong digital learning (p. 104)	
Inclusion of people with disabilities				
GRI 203 Indirect economic impacts		203-1 Infrastructure investments and services supported	Inclusion of disabilities (p. 94)	
Decarbonizzazione				
GRI 305 Emissions	305-1 Direct (Scope 1) GHG emissions		Zero-emissions goal (p. 125)	
	305-2 Energy indirect (Scope 2) GHG emissions		Zero-emissions goal (p. 125)	
	305-3 Other indirect (Scope 3) GHG emissions		Zero-emissions goal (p. 125)	
	305-4 Intensity of GHG emissions		Zero-emissions goal (p. 125)	
	305-5 Reduction of GHG emissions		Zero-emissions goal (p. 125)	

Specific standards			
GRI Standard	Disclosure	Location	Omission
GRI 203 Indirect economic impacts	203-1 Infrastructure investments and services supported	Zero-emissions goal (p. 125)	
GRI 302 Energy	302-1 Energy consumed within the organisation	Zero-emissions goal (p. 125)	
Smart technologies for society and the environment			
GRI 203 Indirect economic impacts	203-1 Infrastructure investments and services supported	Smart technologies for society and the environment (p.132)	
	203-2a Significant indirect economic impacts	Together for innovation (p. 138)	

Other Topics			
GRI Standard	Disclosure	Location	Omission
Business ethics and integrity			
GRI 308 Supplier environmental assessment	308-1 New suppliers that were screened using environmental criteria	A responsible supply chain (p.51)	
GRI 414 Supplier social assessment	414-1 New suppliers that were screened using social criteria	A responsible supply chain (p.51)	
Closer to our people			
GRI 401 Employment	401-1 New employee hires and employee turnover	The Wind Tre team (p. 112)	
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Attention to people (p. 116) The establishment of 'significant operating locations' is not applicable	
	401-3 Parental leave	The Wind Tre team (p.112)	
GRI 403 Occupational health and safety	403-5 Worker training on occupational health and safety	Lifelong digital learning (p. 107)	
GRI 405 - Diversity and equal opportunity	405-1 Diversity of governance bodies and empl	The Wind Tre team (p. 112) Focus on Diversity (p. 91)	INFORMATION UNAVAILABLE/ INCOMPLETE Other indicators of diversity are not available in this report and then not reported. The company intends to make the information complete in the next report [GRI 405-1b III]
	405-2 Ratio of basic salary and remuneration of women to men	Focus on Diversity (p. 91)	
Closer to our customers			
GRI 417 Marketing and labelling	417-3 Incidents of non-compliance concerning marketing communications	Clarity and transparency in business communications (p. 79)	



Calculation criteria

Electric energy consumption

The electricity consumption data include an estimate of the consumption data attributable to Wind Tre for the sites shared with other service providers. This calculation includes an estimate of the consumption attributable to the companies Galata S.p.A. and Cellnex for services offered to Wind Tre using its own equipment (operational criterion). Direct electricity consumption linked to diesel consumption (generators) has been estimated by calculating the litres of diesel consumed in the reference year, multiplied by the kWh/litre conversion coefficient proposed by the Green House Gas Protocol.

Conversion factors utilised [GRI 302-1g]:

- Litre of diesel/kWh: 10.75;
- Cubic metre of natural gas/Kwh: 10.61;
- kWh/GJ: 0.0036.

Greenhouse gas emissions

Since the consolidation approach for Green House Gas emissions (Scope 1, Scope 2 and Scope 3) is the same as the financial and operational control, all the emissions of the subsidiaries are attributed to Wind Tre [GRI 305-1f, 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: (refills of air conditioners/cold stores).

The calculation of the Scope 2 (indirect) GHG emissions includes the emissions from the company's indirect energy consumption, namely electricity consumption, consumption related to district heating, and consumption related to district cooling.

In particular, for the calculation of greenhouse gas emissions, the organisation considers the sum of CO<sub>2</sub> plus emissions of other gases (CH<sub>4</sub> and N<sub>2</sub>O) expressed in CO<sub>2</sub> equivalent.

- The GWP utilised for CH<sub>4</sub> is equal to 21, while for N<sub>2</sub>O it is equal to 310. [GRI 305-1, 305-2];
- For the calculation of indirect greenhouse gas emissions from fuel, the emission factors required by the Green House Gas Protocol were utilised (kg of CO<sub>2</sub> equivalent emitted in relation to the volume of fuel consumed).

The conversion factors for the calculation of the indirect emissions from electricity for the period 2019-2021 (gCO<sub>2</sub> emitted per kWh of 276.3 gCO<sub>2</sub>/KWh) are derived from Table 2.4 of the ISPRA publication - Emission Factors for Electricity Production and Consumption in Italy, 2020. The emission coefficient of electricity consumption is determined from the generation percentages of Italy's electricity production over the years. For 2022, in accordance with the approach adopted by the parent company CK Hutchison Holding the IEA (2022) Emission Factors and DEFRA 2022 conversion factors were used.

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

Description	Units of measurement	Conversion factor CO <sub>2</sub>			
		2022	2021	2020	2019
Electrical consumption	g CO <sub>2</sub> /kWh	269	276.3	276.3	276.3
Diesel, heating, generation, haulage	g CO <sub>2</sub> /Litre	2.52	2.65	2.65	2.65
Natural gas, heating and haulage	t CO <sub>2</sub> / Stdm <sup>3</sup> *10 <sup>3</sup>	2.02	1.972	1.972	1.972
Petrol	g CO <sub>2</sub> /Litre	2.38	2.38	2.38	2.38

The following category-by-category methodological approach was used for the analysis of the Scope 3 categories, defined by the pa-

rent company CKHH which is responsible for collecting data for each company in the Group and for calculating CO<sub>2</sub> emissions:

Category	Sub-category	Methodological approach
1a) Purchased goods and services (products)	Devices	Total volumes of devices purchased The LCA data for specific devices were taken from publicly available sources published by several major vendors (Apple, Huawei, etc.)
1b) Purchased goods and services (non-products)	Non-products	Total operating expenditure related to purchased services
2) Capital goods	Capital goods	Total capital goods expenditure
3) Fuel and energy-related activities	Fuels	Energy consumption from fuels
3) Fuel and energy-related activities	Energy	Energy consumption from electricity
4a) Upstream transportation and distribution	Upstream devices	Data derived from the origin of device shipments from major suppliers processed by weight per device By definition, we chose to consider transport via container shipments Excluded
5) Waste generated by operations	Waste generated by operations	Amount of waste (tonnes) by type and treatment type
6) Business travel	Business travel	Employee business travel data
7) Employee commuting	Employee commuting	Number of employees and calculation made based on average commuting statistics
8) Upstream leased assets	Upstream leased assets	Energy consumption values of upstream leased assets
9) Downstream transportation and distribution		Excluded
10) Processing of products sold		Excluded
11a) Use of products sold	Devices	Total volumes of devices sold
12) End-of-life treatment of products sold	End-of-life of the products	Total volumes of devices sold LCA data for specific devices were taken from publicly available sources published by several major vendors (Apple, Huawei, etc.)
13) Downstream leased assets		Excluded
14) Franchising	Franchising	Total number of franchises and associated square metres with relative energy consumption
15) Investments	Investments	Equity interest in a joint venture, company





# Assurance Statement addressed to Wind Tre S.p.A. stakeholders.

## 1. INTRODUCTION

Wind Tre S.p.A. (“Wind Tre”) has commissioned Bureau Veritas Italia S.p.A. (“Bureau Veritas”) an independent assurance of its 2022 Sustainability Report (henceforth, “2022 Report”), for the purpose of providing findings over:

- the accuracy and quality of published information concerning its sustainability performance;
- the correct application of those reporting principles outlined in the 2022 Report, in particular Global Reporting Initiative Sustainability Reporting Standards (GRI Standards).

## 2. RESPONSIBILITY, METHODOLOGY AND LIMITATIONS

Wind Tre alone had the responsibility of collecting, analyzing, collating and presenting information and data included in its 2022 Report. Bureau Veritas responsibility has been to perform an independent assurance against defined objectives and to reach the conclusions reported in this Statement.

The assurance performed has been a Limited Assurance in accordance to the ISAE 3000 standard, through sample application of audit techniques, including:

- review of Wind Tre’s policy, mission, values, commitments;
- review of records, data and information-gathering systems;
- interviews to members of the working group responsible for drafting the 2022 Report;
- interviews to company representatives from various functions and levels;
- overall verification of information and general content of the 2022 Report.

The assurance activities have been performed “remotely”. We believe we have obtained sufficient and adequate evidence to support our conclusions.

The assurance has covered the whole 2022 Report with the following limitations: for activities outside the reference period (1 January 2022 – 31 December 2022) and for statements of policy, intent and objective, Bureau Veritas verified their consistency against the outlined reporting methodology.

## 3. CONCLUSIONS

Following the assurance activities described above, nothing has come to our attention to indicate that information and data in the 2022 Report are inaccurate, incorrect or unreliable. In our opinion, the Report provides a trustworthy representation of the activities carried out by Wind Tre during 2022 and of the main results achieved.

The information is reported in a generally clear, understandable and balanced manner. In the illustration of activities and results, in particular, Wind Tre has paid attention to adopt a neutral language, avoiding as far as possible the self-referentiality.

With regards to the reporting methodology adopted by the organization in the preparation of 2022 Report, it is our opinion that principles from the GRI Standards (accuracy, balance, clarity, comparability, completeness, sustainability context, timeliness, verifiability) were duly implemented. Based on our assurance activities, the report has been prepared in accordance with the GRI Standards. We also confirm that our audit activities met the GRI requirements for external assurance..

## 4. DECLARATION OF INDEPENDENCE, IMPARTIALITY AND COMPETENCE

Bureau Veritas is a global organization specialized in independent assurance, inspection and certification activities, with over 190 years history, 82.000 employees and an annual turnover of more than 5.2 billion euro in 2022.

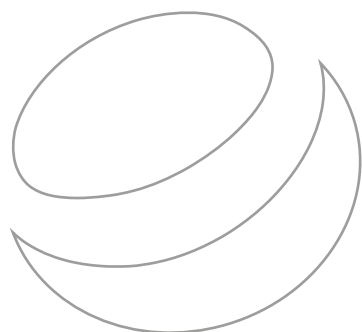
Bureau Veritas applies internally a Code of Ethics and we believe there were no conflicts of interest between members of the assurance team and Wind Tre at the time of the assurance.

Bureau Veritas Italia S.p.A.  
Milan, 27 April 2023

Giorgio Lanzafame  
Local Technical Manager



This image shows a full page of blank, lined paper. It features approximately 20 evenly spaced horizontal grey lines across its entire width, providing a guide for handwriting or typing. The paper itself is a clean, off-white color.[illegible]



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**BACK TO SUMMARY**



