MUCH CLOSER

for a more sustainable future

2023 SUSTAINABILITY REPORT

Letter to the stakeholders

[GRI 2-22]

Once again, this year, we are proud to share with our stakeholders the report on the activities and progress made by Wind Tre in the three environmental, social and economic dimensions, aware of the fundamental contribution that technology and digitalization can make to achieving a sustainable balance between communities and territories.

2023 was marked by dramatic conflicts and major challenges for the value chain, starting with rising energy costs. The Italian market is still crowded and increasingly competitive, with prices among the lowest in the world. Despite these conditions, we have continued to make our contribution to the country's growth, thanks to investments in our extensive communications network and the expansion of the portfolio of solutions we make available to customers. After launching cybersecurity services, strengthened by the purchase of Rad, and the launch of our energy products, we have successfully introduced an insurance offer that we intend to develop to provide customers with an even better service.

The Corporate ESG Plan, implemented from 2022, has proven to be an excellent process governance tool. With its 10 goals, managed by the same number of Ambassadors and linked to annual indicators and targets, many of which are integrated into management's incentive plans, it is a guide to progressively but steadily get closer to the goals we have set for 2030.

Among these goals, there is commitment to environmental protection and the target to eliminate scope 1 and 2 emissions by 2030. At the end of 2023, we have achieved a reduction in scope 1 and 2 emissions of 46% compared to 2017, the year of the Wind and Tre merger. This result that has been reached thanks to the strong focus on optimizing network infrastructure operations and maintaining stable electricity consumption despite data traffic consumption growth of more than 6 times compared to 2017. With the introduction of the new ESG objective "Sustainable Supply Chain", we are also involving the supply chain in the path of constant improvement of our environmental and social impact.

In addition to the environmental dimension, the social dimension is particularly important to us, because we feel a responsibility for the well-being of our almost 20 million users, especially when they are online. With the latest edition, the NeoConnessi digital education initiative has reached more than one million fourth and fifth grade children, their teachers and their families since 2018, in an overall effort to make young Internet users aware of the risks and improve their protection. Recognizing that social progress enabled by technology is fully realized with community involvement, we have also brought technologies and training to more than 90 villages, with the involvement of citizens and administrations, and signed collaboration agreements with 25 cities to accompany them in their digital transformation.

In fact, economic and social development nowadays depends upon knowledge and human capital. This is true for all companies, and particularly for Wind Tre, where the development of our community of people continues to be of fundamental importance. This is evidenced by the more than 340,000 hours of training provided to employees in 2023 alone, and the many initiatives to promote employee well-being, gender equality and respect for diversity.

These efforts are also recognized by independent parties: for the sixth consecutive year we have been classified as a Top Employer and during the year we have renewed the Equal salary certification issued by the Equal-salary Foundation and the SA8000 certification for Social Accountability. We have also received awards such as Sustainability Leaders from Statista and Sole 24 Ore and Sustainability Champions from the German Institute of Quality and the Republic.

In addition, testifying to the fact that profitability and sustainability are not opposing criteria in business management but dimensions that go hand in hand, Wind Tre's ESG rating from EcoVadis - one of the most accredited platforms for the certification of corporate sustainability - improved by 25% points compared to the previous year, placing Wind Tre among the 1% of best companies in the telecommunications sector worldwide.

In conclusion, we would like to underline how much the commitment to make our economic activity more sustainable is a collegial effort within Wind Tre. In this regard, to further strengthen the governance of the ESG Plan and associated transformation processes, the company's Board of Directors launched a Sustainability Committee, composed of members of the Board itself and the entire management team. That is a testimony to the collective commitment which exists to ensure our concrete contribution to the sustainable development of our communities.

Our special thanks therefore go to all our people who, with their constant commitment, contribute every day to the success of Wind Tre as a responsible and sustainable company.

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Gianluca Corti and Benoit Hanssen

Co-CEOs – Wind Tre

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Summary

WE EXIST TO ELIMINATE THE DISTANCES BETWEEN PEOPLE

Wind Tre is the number one mobile operator in the Italian mobile market and is among the main alternative operators in the fixed line market. It is part of the CK Hutchison Holdings Limited Group. 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. With the launch of the 'WINDTRE LUCE&GAS' brand, the company has also entered the energy market, offering itself as a single point of reference for the simplified and transparent management of all household utilities at the right price. As well as providing connectivity services and energy, the WINDTRE brand has consolidated its multi-service identity through the launch of WINDTRE Assicurazioni. In partnership with wefox – an insurtech market leader in Europe – WINDTRE Assicurazioni offers insurance products designed to protect customers at home and in their free time and to give them general peace of mind during everyday life.

Much closer, for a more sustainable future

'Here at Wind Tre we are committed to eliminating distances between people, because we know that much closer we can achieve a more sustainable future. We promote ethics, integrity, inclusion and we work to guarantee reliability, equal access, transparency and a safer digital environment for everyone, even for those who are most fragile. We believe in an inclusive technology that its also capable of improving health, the environment and people's quality of life. We work for environmental protection and to reduce emissions also involving our supply chain. We make digitalisation, innovation and skills available to the community and Institutions to enable the digital and sustainable transition, guaranteeing proximity to our territories.'

Wind Tre is committed to building a more sustainable future by integrating sustainability into business activities with environmental and social initiatives and projects that refer to the key themes identified together with all interested parties. These topics of greatest interest are classified into three 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

- Important results achieved in the second year of the **company ESG plan.** A sustainability long term plan with 2025-2030 time horizon made of 10 concrete, business-integrated objectives: associated with 27 measurable key performance indicators;
- To testify the active involvement of the Top Management and the various company departments, the ESG Plan's indicators are firmly included in the company management **incentive plan**;

- Introduced a new goal: "Sustainable Supply Chain". 100% of suppliers in the company register valuated on adhesion of SA8000 principles, 59% of suppliers subject to dedicated ESG assessment thanks to the partnership with the CRIF Group;
- A new Sustainability Policy, to formalize the reference principles needed to guide the company's activities that incorporate social, environmental and governance commitments within the company's strategy and organisation;
- Implemented internal sharing paths aimed at spreading the culture of sustainability within the company. Continued the periodic Sustainability Newsletter sent to all Wind Tre people;
- Safeguarding of the internal tools for reinforcing the **fight against corruption**: an anti-fraud and anti-corruption policy, anti-fraud and anti-corruption guidelines for suppliers, a due diligence procedure for business partners and a conflict of interest policy;
- Confirmed the membership of **Transparency International Italia,** the Italian branch of the largest anti-corruption group in the world;
- Wind Tre is among the **best 1% of companies evaluated by EcoVadis in the telecommunications sector in 2023**;
- Obtained the three-year renewal of the Health and Safety (ISO 45001) and Information Security (ISO 27001 (for Cloud Services) certifications and successfully passed the maintenance audits for the other six certificates;
- Even more **'NeoConnessi';** the project born with the aim to support teachers and parents to help children as they learn to navigate the Internet on their own has reached more than 1 million of families in Italy, and in the academic year of 2022/2023, involved **more than 15,000 classes of children in the last two years of primary school**;
- Launched on the **Safer Internet Day**, the 'NeoConnessi Decalogue' sets out "10 steps for families informed and protected on the Internet", to provide useful advice to encourage the correct digital education of children and to enable positive, safe surfing;
- In 2023, more than 4 million people and businesses were protected by our IT security solutions;
- Consolidation of cybersecurity for the business market with the acquisition of 70% of RAD, an Italian company specialising in cybersecurity solutions designed and built to respond to the IT security demands of small, medium-sized, and large businesses;
- **Implemented the Service continuity** initiatives aimed at verifying the resilience of the network and ensuring optimal continuity of service;
- **8.1 out of 10 the overall** WINDTRE **customer satisfaction,** 8.5 the **loyalty** (DOXA surveys);
- Introduced the **artificial intelligence** for the customer support service to ensure a straightforward and uniform experience across all contact channels;
- **Almost 1.7 million** the customers that at the end of 2023 have activated and used at least one time, **Please Don't Call**, the free service, now also for business customers, that notifies of potential unwanted calls before the customer answers;
- Wind Tre awarded as "**Leader of Sustainability 2023**" by Il Sole 24 Ore and Statista, and first in the telecommunications category among the "**Champions of sustainability**". **This was revealed by the study "Champions of Sustainability", edited by the German Institute for Quality and Finance.**

More Humanity

#Digital Divide #Gender Parity #Continuous digital learning #Inclusion of people with disabilities #Closer to our communities #Closer to Wind Tre people

- A more uniform internet access thanks to a further increase in **mobile network coverage** and in the cities reached with **FTTH (Fiber to the Home)**;

- Participation of **92 municipalities** (around 340,000 members of the public) in the **Connected Villages** project: the project created with the aim of helping small municipalities to overcome the cultural obstacles that sometimes slow down the spread of new technologies and trigger a journey towards a new, more sustainable development;

- First telecommunications company in Italy to introduce a **Wi-Fi Calling** service: the feature that allows people to make and receive calls even in the absence of mobile signal, via a Wi-Fi connection;

- First telecommunications company in the world to receive **EQUAL-SALARY certification**, that was also confirmed for 2023;

- Gave support for the **opening of the 'S.O.S. Lei' violence prevention centre,** founded in March 2023 thanks to a partnership with **Fondazione Policlinico Gemelli IRCCS and the ASSOLEI association;**

- The short film '**DI NOTTE**' ('AT NIGHT') made by Wind Tre in partnership with the IED OffiCine cinema training laboratory under the artistic direction of Silvio Soldini, has been at the centre of a communication and social campaign against digital violence;

- Competences are key: **more than 340,000 hours of training** provided to Wind Tre personnel in 2023 only;

- **Further improved the accessibility index for digital touchpoints** and for the Wind Tre, Very Mobile, and Wind Tre Business sites. All Wind Tre social posts made accessible;

- **80 social and humanitarian initiatives** supported in 2023, with a total of about 2 million euros collected;

- Welfare plans developed to improve well-being and quality of life of employees including: **initiatives to support parents** (reimbursement of school fees for attending a nursery or nursery school, reimbursement of a fee for a week of summer campus for children etc), new agreements with the **Multiversity Group** for discounts on the annual fee in the Pegaso, Unimercatorum and UniMarconi online universities, "**Welfare Comete**" psychological consultancy service;

- Wind Tre is **one of the signatories of the 'Business for People and Society' manifesto** drawn up by the UN Global Compact Network Italy, the local network of the largest corporate sustainability initiative in the world. Confirmed the commitment to consolidating the role of the social dimension in business strategies;

- The **Top Employer Italy** certification confirmed for the sixth year, testifying Wind Tre's continuous commitment to its people and to their valorisation and full realisation. Wind Tre was also confirmed as **Italy's Best Employers** and **Europe' s Diversity Leaders** awards.

More Green

#Decarbonisation #Smart technologies for the society and the environment

- **CO₂ emissions reduced by46%** (Scope 1 and 2) in comparison with 2017, Wind Tre's first year of operation. The path to reach net zero by 2030 continues;
- Continued the effort aimed at **optimizing the network infrastructure**, which has maintained its electricity consumption almost constant despite the exponential increase in data traffic;
- As always on the side of WWF Italy, in 2023 supporting the '**VALORE OASI**' (OASIS VALUE), and the protection of the Macchiagrande oasis near Fiumicino (Roma);
- Implemented the 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: from the closure of an entire wing of the company headquarters in Rome in order to increase energy savings, to the installation of Ecobox in all company offices;
- **Decreased by 33% the consumption of water** at the company's offices from 2021 thanks to the work aimed at improving the efficiency of toilet facilities and to recover excess water from evaporative air cooling towers (that is then used for irrigation);
- **Company fleet with 26% of electric or hybrid** vehicles (hybrid/electric and plug-in), with the aim to reach 40% in 2024;
- Implemented the activities aimed at **making our shops more and more sustainable**: LED lighting, an air quality monitoring platform, reducing paper consumption with digital solution alternatives, like the "SMART SCANNER" document verification system, which allows to eliminate the need to copy customers documents and eliminates the paper archive of contracts;
- The first year of implementation of the **two new environmental certifications: Energy Management** (ISO 50001) and **Greenhouse Gases Emissions** (ISO 14064-1) which have enriched in 2022 our **Integrated management system**;
- Signed, in 2023, **18 new** memorandum of understanding, to be added to the 7 already signed in 2022, leading to **25 the total of cities** active in the '**Smart City**' project, aimed at supporting the digital and sustainable transformation of Italian cities thanks also to the capacity building aimed at public administration;
- **Energy Supervisor**: an ICT solution for the digital management of energy consumption and expenditure by companies and public administrations; Corporate partner of the **Case delle Tecnologie Emergenti** (CTE) schemes 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 which are beneficial to members of the public and businesses;
- Developed a **private network for PSA Italy** to provide a new 5G radio coverage and data centre connectivity system which will enable new IT functions at the Port of Genoa;
- Extension of product life cycle through **repair and reuse options offered to consumers and business customers;**
- Integrated the product portfolio with **refurbished smartphones** available with all Wind Tre mobile offers, with the aim of reducing CO₂ emissions, limiting the extraction of rare minerals and reducing the waste to be disposed, produced by electronic devices (WEEE);
- Launched **Giga Green**, the completely free Very Mobile brand program that allows Very customers to transform the Giga consumed each month into "Giga Green", which can be used to help implement eco-sustainable and environmental protection projects in our Country.

Based on the key topics, Wind Tre has defined an ESG plan to be applied throughout the company. The plan is fully integrated with business activities.

This concrete, measurable programme involves the participation of all parts of the company. In 2023, most of the programme's objectives were again achieved, with significant consequences on multiple fronts including the increased ability to create shared value and the company's reputation, as evidenced by the important awards won.

The plan sets out 10 ambitious goals to be reached between 2025 and 2030.

The Company

Who is Wind Tre?

[GRI 2-6]

Wind Tre is a multi-service operator which provides connections, energy, and insurance products[1]. It is a point of reference for families looking for offers which provide reliability, affordability, and transparency.

Wind Tre has positioned itself as Italy's top mobile telecommunications provider[2] thanks to its 'Top Quality Network' state-of-the-art infrastructure.

WINDTRE brand is consolidating the value positioning of the company with a focus on welcoming, inclusive technology. Having always been 'much closer' to customers in their everyday lives, WINDTRE actually strives to facilitate interpersonal connections and to help people to face the challenges of today's world.

The WINDTRE BUSINESS division of the Wind Tre Group supports companies, professionals, and administrations with the challenge of digital and sustainable transformation. WINDTRE BUSINESS offers a wide variety of services for fixed and mobile telephony and ultra broadband, fibre, and FWA connectivity as well as solutions for data analytics, cybersecurity, and cloud solutions with latest-generation data centres. It has a large number of partnerships with leading ICT solution and application providers.

With the nationwide launch of the 'WINDTRE LUCE&GAS' brand in January 2022, the company entered the energy market. At the end of 2023, Wind Tre enriched its multi-service identity with the launch of WINDTRE Assicurazioni insurance services, becoming a point of reference for families looking for offers which provide reliability, affordability, and transparency.

The company is part of the multinational CK Hutchison Holdings Limited Group.

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[1] Energy and insurance services offered by third-party partners. Wind Tre S.p.A. insurance intermediary registered in Section A (Agents) of the Italian Single Register of Intermediaries (RUI), subject to supervision by the Italian Institute for the Supervision of Insurance (IVASS). For more information, see www.windtre.it.

[2] WINDTRE has come out on top by number of human SIMs (total SIMs minus SIMs enabled only for machine-to-machine communication) for 24 consecutive quarters [source: AGCOM Watchdog 4-2023].

Part of the CK Hutchison Group

CK Hutchison Holdings Limited is a multinational group that has always been committed to innovation and technology. It operates in four core business areas: ports and related services, retail, infrastructure, and telecommunications. It has a presence in over **50 countries** worldwide.
CK Hutchison is a global leader in the telecommunications field, with more than 176 million customers.

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 structured governance model for sustainability management with a sustainability committee at Board of Director level and policies that include a sustainability policy, environmental policy, health and safety policy, human rights policy, modern slavery policy, and the Supplier Code of Conduct (https://www.ckh.com.hk/en/esg/esg_policies.php).

Each of the core companies of the Group operates in specific sectors and geographic areas. To ensure alignment with the parent company, each member company has its own interdepartmental sustainability team, supervised by senior management. This ensures that sustainability concerns are integrated into the decision-making processes of each business unit.

The CK Hutchison Sustainability Framework is centred around four pillars (Environment, Social, Governance, and Sustainable Business Model Innovation) and nine major long-term goals which are pursued in accordance with the business 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 sustainability governance of the CKHGT Group includes the **Sustainability Network and Climate Action Working Group**, which meets quarterly and is attended by members of all of the Group's companies.

In keeping with the CK Hutchison Sustainability Framework, CKHGT has also established its own **sustainability strategy**. 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 on climate change**
- **To promote a circular economy**
- **To create great places to work**
- **To operate with responsibility and integrity**

Many joint projects were conducted in 2023 within the CKHGT Group, including the continued oversight of work in accordance with the Task Force on Climate-Related Financial Disclosures (TCFD) and preparation for sustainability reporting in accordance with the EU taxonomy for sustainable activities. In addition, a

collaborative process for preparing the Group for the implementation of the Corporate Sustainability Reporting Directive (CSRD) was launched.

Wind Tre is the largest operator in the CKHGT Telecommunications division. It is helping to compile the CKHGT Sustainability Report by sharing its own best practices and by supporting all of the initiatives of the parent company by actively taking part in all of the working groups relating to sustainability topics.

At the end of November 2023, Wind Tre hosted the 2nd CKHGT SUSTAINABILITY FORUM in Rome, which was attended by the sustainability teams of the telecommunications companies of the Group as well as by representatives of the many corporate departments which collaborate on the implementation of the sustainability strategy. On the first day of the event, which took place at the headquarters of Associazione Civita in Rome's Piazza Venezia, internal and external speakers took turns to talk about some of the most important sustainability issues, including decarbonisation, diversity and inclusion, sustainable services and products, and sustainability in the supply chain. In contrast, on the second day, the teams worked on the planning of the joint initiatives scheduled for the following year.

Global Compact

As confirmation of the company's commitment to creating a more sustainable future, **Wind Tre supports the Global Compact** [the world's largest corporate citizenship initiative, bringing together more than 13,000 companies in over 170 countries with the objective of incorporating social and environmental principles into business activities and stimulating actions by companies in support of the broader objectives of the United Nations].

In addition, as of 2023, Wind Tre has been a signatory to the 'Business for People and Society' manifesto drawn up by the UN Global Compact Network Italy, the national Global Compact network of the United Nations. By signing the manifesto, Wind Tre commits to further consolidating the role of the social dimension in its corporate strategies in order to generate long-term value.

Like Wind Tre, the CK Hutchison Group adheres to the Global Compact of the United Nations and is committed to corporate responsibility initiatives in the fields of human rights, labour, the environment, and the fight against corruption.

The corporate structure

[GRI 2-1, GRI 2-2, GRI 2-4, GRI 2-9, GRI 2-10]

Wind Tre S.p.A. is a single shareholder joint stock company managed and coordinated by CK Hutchison Group Telecom Italy Investments S.à r.l., a limited liability company based in Luxembourg.

The CK Hutchison Holding Limited (CKHH) Group is *a multinational* conglomerate *listed* on the Hong Kong Stock Exchange and *active in the fields of ports and related services, retail, infrastructure, and telecommunications*. Wind Tre is not listed on the stock exchange. Wind Tre S.p.A.'s registered offices are located at Largo Metropolitana 5, Rho (Milan), Italy, and serve as the administrative, financial, and technological hub for the company itself and for the Italian group to which it belongs, which includes the sole shareholder company Wind Tre Italia S.p.A. and Wind Tre S.p.A.'s subsidiaries (Wind Tre Retail s.r.l., 3Lettronica Industriale S.p.A., CKHH MSK 22 s.r.l., Zefiro NET s.r.l., and RAD S.r.l). The company also has premises at Via Cesare Giulio Viola 48, Rome, where its legal, commercial, regulatory, and institutional activities are based.

In 2022, Wind Tre and Iliad Italia S.p.A. ('Iliad') signed a RAN sharing solution agreement to create a 50/50 joint venture with the objective of co-investing in low-profitability areas, i.e. the least densely populated parts of Italy. On the 3rd of January 2023, Wind Tre sold 50% of shares in Zefiro Net to Iliad. The purpose of Zefiro Net is to design, develop, construct, install, maintain, and manage electronic communication networks and technological infrastructures – including for the benefit of third parties – and to design, develop, and maintain software as well as to partake in the wholesale of products connected and in relation to communications and to provide the associated support network, all with a view to providing wholesale communications services of all kinds, potentially on the basis of the acquisition of intermediate services from third parties.

In May 2022, Wind Tre submitted a non-binding offer to IG Investment Group S.r.l. for the acquisition of 70% of the share capital of RAD S.r.l., and 70% of shares in RAD were sold to Wind Tre on the 14th of April 2023. Today, 70% of RAD is owned by Wind Tre (the majority shareholder) and 30% is owned by IG Investment Group S.r.l. (the minority shareholder). Acquiring RAD has given Wind Tre the notable opportunity to continue its business diversification plan to expand into more areas of the Italian market. The acquisition allows it to enter into the world of IT security, thus ensuring the integration of the services provided by RAD into the value proposition of Wind Tre.

Wind Tre S.p.A. subsidiaries and affiliates as of 31/12/2023	Registered offices of company/group	Percentage of share capital/ group capital 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.[3]	Italy	50%
RAD s.r.l.	Italy	70%
Mix s.r.l.	Italy	9.97%
Janna S.c.ar.l.	Italy	17%
MIP Polytechnic University of Milan	Italy	2.82%
CAMPANIA DIGITAL INNOVATION HUB – RETE CONFINDUSTRIA SCARL	Italy	10%
Consel Consorzio ELIS a r.l.	Italy	1%

The Group has other secondary location distributed throughout Italy, which allow the company to maintain a stable presence nationwide.(In the remainder of this document when it is referred to "Wind Tre Group" is to be understood the Wind Tre Italia S.p.A. all its subsidiaries directly and indirectly belong[4]).

The Wind Tre Group 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 is present throughout Italy for these reasons and

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[3] The reduction in the ownership share in this company from 100% to 50% means that it no longer falls within the scope of reporting.

[4] The reporting perimeter of this document refers to Wind Tre Italia S.p.A and its 100% subsidiaries, with the only difference compared to the criteria adopted for the statutory financial statements of the exclusion from the reporting perimeter of RAD S.r.l., a company with less than thirty employees 70% controlled and entered into the financial consolidation for 9 months.

has a field of action which extends to the whole of Europe. The Wind Tre Group also offers energy and insurance services.

The Wind Tre Group 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 shareholders.

The Group's governance structure is comprised of the boards of directors and where named, of the board of auditors.

Pursuant to the articles of association of each company in the Wind Tre Group, the Board of Directors may consist of a maximum of 15 members who remain, as a rule, in office for a period not exceeding three financial years and may be re-elected. The shareholders' meeting determines the number of members of the Board of Directors of Wind Tre Group and appoints the directors themselves, who – as a rule – do not receive any remuneration for positions held.

The Board of Directors is vested with all 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 of Wind Tre Group's companies has not established executive committees pursuant to Art. 2381 of the Italian Civil Code. The Board of Directors of Wind Tre S.p.A. was appointed on the 31st of March 2022 and currently consists of seven directors: six men and one woman.

The chairman of the Board of Directors is vested with the powers provided for by law and by Wind Tre S.p.A.'s articles of association.

There are two co-CEOs, both of whom are executive directors on the Board of Directors of the Wind Tre Group. The members of the Board of Directors of Wind Tre S.p.A. as appointed by the shareholders' meeting on the 31st of March 2022 are as follows:

Fok Kin Ning Canning (Chairman of the Board of Directors), who does not hold an executive role in Wind Tre, Gianluca Corti (Co-CEO), Benoit Jacques Joseph Hanssen (Co-CEO), Frank John Sixt (Director), Stefano Invernizzi (Director), Edith Shih (Director), and 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 include the company's Chief Financial Officer, Stefano Invernizzi. In addition to holding executive roles relating to their positions, the two co-CEO indicated have the similar roles in each of the Wind Tre Group's subsidiaries except in the case (i) of Wind Tre Retail, where Gianluca Corti – as well as being co-CEO – is Chairman of the Board of Directors and Benoit Hanssen is co-CEO and (ii) CKHH MSK 22 S.r.l., where the Board of Directors is made up of Benoit Hanssen, President of the Board of Directors, and Stefano Invernizzi, Director; neither of whom having any other posts outside the company.

The selection and the appointment of the members of the Board of Directors are performed in accordance with the requirements of Italian law and with the Wind Tre Code of Ethics and the Group's corporate governance guidelines and rules, which take into account – among other things – the experience, integrity, and professionalism of potential members. (For more information, see https://www.ckh.com.hk/en/about/cg_policies.php.)

The proper performance of the functions of responsibility involved in the management and administration of the company requires members of the Board of Directors with adequate qualifications for their role and who are highly skilled. The skills of the various members must be diverse and appropriately distributed across the Board of Directors in order to enable the efficient administration of the company with the primary aim of protecting the interests of Wind Tre and of the Group.

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 current legal provisions and the corporate governance policies of the Group to which it belongs, the company adopts solid corporate governance principles which emphasise the importance of a high-quality Board of Directors and effective internal controls, both based on a corporate culture of ethics and responsibility.

In addition, there is a Board of Auditors, composed of three permanent and two substitute auditors, which acts as the internal control body for the major company of the Wind Tre Group. Its members are: Marcello Romano – Chairman of the Board of Auditors, Roberto Colussi – Permanent Auditor, Luca Occhetta – Permanent Auditor, Fabio Carusi – Substitute Auditor, and Giuseppe Tarantino – Substitute Auditor.

To support this governance structure, a Management Team has been established. It is composed of the following persons with the stated roles: Gianluca Corti and Benoit Hanssen – Co-CEOs, Roberto Basso – Director of External Affairs & Sustainability, Rossella Gangi – Director of Human Resources, Stefano Invernizzi – Chief Financial Officer, Carlo Melis – Directory of Technology, Mirko Rugarli – Director of Customer Experience & Data Analytics, Enzo Maurizio Sedita – Commercial Director, and Mark Alexander Shalaby – Legal & Regulatory Director.

The Wind Tre S.p.A. Management Team is the point of reference for ESG matters for the entire Group.

Identity and values

Purpose

WE EXIST TO ELIMINATE THE DISTANCES BETWEEN PEOPLE

Vision

WE WANT TO BE THE MULTI-SERVICE COMPANY OF CHOICE EVERY SINGLE DAY TO ENSURE A BETTER LIFE AND A BETTER FUTURE FOR EVERYONE

The citizenship model

Since 2021, Wind Tre has established a citizenship model intended to **encourage appropriate conduct on the part of everyone who works for the company** and to guide day-to-day actions in people-oriented processes including talent acquisition, performance management, development, and training.

This evolutionary and effective model is simple and concrete, and is designed for everyone. It is based on purpose and values and is **broken down into** eight behaviours which **can have concrete and measurable** effects both inside and outside the company.

Wind Tre's 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 regardless of gender, race, age, religion, disability, status, and digital knowledge in order to break down all barriers and eliminate all forms of discrimination.

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.

A network of people and a wide range of services

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.

For the MOBILE network, Wind Tre offers 5G coverage to more than **96%** of the Italian population, with a state-of-the-art infrastructure and top performance even if a large number of users are surfing at the same time and in highly congested locations.

The network is the result of intensive technological updates which commenced in 2017 with the aim of meeting the growing demand for connectivity on the part of customers, that in previous years has been sustained by **investment of over 6 billion euros**.

The level of coverage offered by Wind Tre's outdoor mobile network is close to **100% in terms of population reached**, with a figure of 99.9% for 2G (GSM), 99.6% for 3G (UMTS/HSPA), 99.7% for 4G (LTE), and 96.5% for 5G[5].

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 with wholesale partners. **Thanks to the partnership with Open Fiber, which is responsible for providing the fibre optic connections, FTTH coverage has been expanded, with 237 municipalities reached by the end of December 2023[6].**

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[5] 5G service applies only in Italy. For 5G navigation, you must have an enabled offer and a 5G device and you must be in an area covered by the WINDTRE 5G network. The figure of 96% here is for 5G FDD DSS (Frequency Division Duplex - Dynamic Spectrum Sharing), with the figure for 5G TDD (Time Division Duplex) being 72.2%.
[6] Total number of municipalities reached between 2017 and 2023

Particular attention has been paid to the development of 5G technology, which has a key role in the digitalisation 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.

WINDTRE LUCE&GAS powered by Acea Energia

With the national launch of the "WINDTRE LUCE&GAS" brand in January 2022, the company entered the energy market. The partnership between Wind Tre and Acea Energia (which acts as the technical provider) covers the entire national territory, involving around 3,000 WINDTRE sales outlets. The aim of the partnership is to promote and market the 'WINDTRE LUCE&GAS Powered by Acea Energia' offers. In addition to the sales outlets, customers can use the dedicated call number 159 as a further channel for contracting electricity and gas products.

The supplied electrical energy is subject to a 'guarantee of origin', i.e. electronic certification attesting to the renewable origin of the sources used to produce the electrical energy provided. WINDTRE Luce&Gas is committed to complying with the stipulations of Resolution ARG/elt/104/11 as amended and supplemented of Italy's Regulatory Authority for Energy Networks and the Environment (ARERA). The CO_2 emissions of the gas are offset, paid by the partner Acea, by the purchase of certified carbon credits. The carbon credits contribute to financing and supporting carbon mitigation projects in Cambodia and Vietnam. These projects have concrete benefits for local communities[7].

Since all WINDTRE LUCE&GAS offers have the **electronic billing** service included, practically all customers received their bills in digital format in 2023, helping to reduce paper waste and the CO_2 emissions associated with printing and delivery.

As of the end of 2023, customers also benefit from the new interactive billing service, which makes it easier to display their consumption and cost items. Interactive bills also contain references to useful articles and an FAQ which helps customers to reduce and optimise their energy consumption.

The brand had already strengthened its presence on the consumer market in 2022, by focusing on convergence marketing, with an added benefit for all customers who activate fixed-line and mobile phone offers, and has even extended its offers to the micro business market in order to provide professional customers with a dedicated offer, too.

WINDTRE Assicurazioni insurance services

In September 2023, Wind Tre entered the insurance sector as a multi-firm insurance agency.

The business model is based on a strategic partnership with wefox, an insurtech leader in Europe, which – through its innovative and modular technology platform – allows around 700 authorised WINDTRE stores with staff trained in selling insurance to activate insurance products in the store in a quick, easy, and fully digitally way without wasting paper at any stage of the sale.

The insurance products distributed by Wind Tre have been created specifically for our clients by Net Insurance, Axa Partners Italy, and HDI Embedded – a brand of T.U. Europa SA.
All of the products are annual policies with a monthly premium and fixed prices. They include the following:

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[7] Projects in 2024

- An offer dedicated to protecting your home and family, encompassing three products with increasing coverage levels from the 'Start' version, which includes third-party liability, home assistance, and the reimbursement of bills in the case of unemployment or a serious injury, to the 'Full' version, which also offers coverage for damage to the building and its contents even in the case of theft
- An offer which covers the repair of home appliances due to failures or malfunctions which occur after the expiry of the legal warranty offered by the manufacturer or compensation in the case of appliances which cannot be repaired or which it is not cost-effective to repair
- A travel and holidays product called 'Viaggi e Vacanze', offering coverage for all of the customer's trips throughout the year in Italy and the rest of Europe, including – among other guarantees – travel cancellation, medical expenses, and 24-hour medical assistance
- An offer providing coverage to customers during amateur sports, including liability insurance for amateur sports and the reimbursement of the costs of emergency medical care and of physiotherapy following an accident as well as prepaid sports fees and damage to equipment, with offer variants for an individual or for the entire nuclear family

Awards and acknowledgements received in 2023:

For the sixth consecutive year, Wind Tre was recognised by Top Employer Italia in relation to its 2023 activities, for its corporate excellence in HR policies and strategies and in the implementation of these policies and strategies in order to contribute to the well-being of employees and to improve the working environment.

Wind Tre was recognised as a sustainability leader in Il Sole 24 Ore and Statista's 'Leader della Sostenibilità 2023' award. Wind Tre entered the ranks of the 200 most sustainable large Italian companies following research evaluating around 1,500 companies based in Italy in accordance with 45 indicators relating to three sustainability dimensions.

For the seventh consecutive year, Wind Tre took first place among telephony service providers in the 'Best in Italy - Service Champions 2023' study of the German Institute of Quality and Finance ITQF. Wind Tre was recognised 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.

Wind Tre took the top spot in the telecommunications category of the 'Sustainability Champions' award thanks to its attention to sustainability issues according to the study of the German Institute of Quality and Finance, published by Repubblica Affari&Finanza.

Wind Tre is one of the best employers in the opinion of employees according to the survey of the German Institute of Quality and Finance, published by Repubblica Affari&Finanza. In addition, it is at the top of the telecommunications sector due to having the best reputation among its own employees.

In 2023, Wind Tre was again recognised as an EQUAL-SALARY company. This certification, first awarded by the EQUAL-SALARY Foundation in 2022 following a voluntary audit carried out between May and December 2021, is based on rigorous methodology developed in collaboration with the University of Geneva, and entailed the

involvement of PwC in audits which 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 and inclusion policies which 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 achievement of the EQUAL-SALARY certification, an important milestone for Wind Tre as the first telecommunications company in the world to have gained this certification in 2022, was communicated through a major press campaign – with the publication of original content from employees – and internal (intranet) and social (LinkedIn) channels.

In 2023, through the methodology of social listening, Wind Tre was recognised for the fourth year in a row and certified by the 'Italy's Best Employers' awards of Statista and Corriere della Sera's 'Buone Notizie'. Wind Tre ranks among the 450 most appreciated employers in Italy, with the highest satisfaction rate of its own employees. The company gained a special mention as part of the sustainability and social impact award. The company's strengths include attention to general well-being as part of a good work/life balance as well as continuous training and promotion/development pathways. Climate is increasingly important, as are the projects and values which the company advocates. The jury which adjudicates the awards also gave a positive mention to the company's corporate guidelines, such as asking employees for feedback and encouraging practices that promote an inclusive culture.

Wind Tre was again recognised in the Europe's Diversity Leaders survey conducted by Statista and the Financial Times. Wind Tre was identified as an employer which demonstrates outstanding leadership in matters of diversity and inclusion and was ranked among the 850 corporate diversity leaders in Europe, only 36 of which are Italian. Wind Tre was also recognised as a sustainability leader in Il Sole 24 Ore and Statista's 'Leader della Sostenibilità 2023' award. The company entered the ranks of the 200 most sustainable large Italian companies following research evaluating around 1,500 companies based in Italy in accordance with 45 indicators relating to three sustainability dimensions. This recognition attests to Wind Tre's continuous commitment to developing active projects in the social, environmental, and economic fields. In 2023, Wind Tre took the top spot in the telecommunications category of the 'Sustainability Champions' award thanks to its attention to sustainability issues. This attention was noticed by the study of the same name, conducted by the German Institute of Quality and Finance, which took environmental factors into account as well as considering economic and social factors of corporate management.

Finally, Wind Tre's sustainability impact was recognised in the 'Diversity & Inclusion' category by the University of Pavia. This award attested to Wind Tre's ongoing commitment to fostering well-being and inclusion at all levels by travelling a more sustainable and inclusive path. The recognition comes in addition to others already received by the company for its diversity, inclusion, and equal pay policies.

Much closer, for a more sustainable future

Wind Tre and the goals of the global agenda

Thanks to continuous dialogue with stakeholders, Wind Tre has established an approach to ESG issues which aims to maximise the positive impact of the company on society and the environment while actively contributing to the achievement of the goals of the UN's 2030 Agenda for the Sustainable Development.

Wind Tre aims to ethics and integrity in all its activities. Based on the key themes identified together with its stakeholders and its DNA, the company aims to work to guarantee reliability, equal access, transparency and

a safer digital environment for everyone, starting with those who are most fragile. Wind Tre also intends to actively contribute to preserving the environment, involving its customers and suppliers in doing the same. From this point of view, the company works to guarantee inclusion and to make digitalisation, innovation and skills available to the community and institutions, with the aim of enabling a fair and environmentally sustainable transition and guaranteeing its closeness to all the territories of the country.

THE 2030 AGENDA FOR THE SUSTAINABLE DEVELOPMENT

The 17 of the Agenda of 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 development within and across generations. One of the key principles is '*Leave no one behind*'.

ESG Model

Wind Tre's existence eliminates 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 also committed to ensuring maximum online security for all by protecting the sensitive data and privacy of all its customers and by shielding the most vulnerable groups, such as the young and the elderly, from potential online threats.

- **More Humanity:** Wind Tre believes that, if used correctly, digital technologies are a means of reducing distances and guaranteeing greater inclusion 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 maintains that everyone – starting from companies – must play their part in the challenging fight against climate change. Wind Tre is committed to making its activities as environmentally sustainable as possible, first and foremost by reducing its emissions and using resources more efficiently also involving its supply chain. Wind Tre also supports the concept of the twin transition and invests in 5G and in the digital technologies required to make our cities and communities more sustainable.

Stakeholder and relevant topics

[GRI 2-25, GRI 2-29, GRI 3-1, GRI 3-2, GRI 3-3]

Wind Tre maintains regular dialogue and discussion with stakeholders, individuals, and interest groups. Over time, the company has established strong partnerships and trusting relationships with these parties. Wind Tre's relations with the people and organisations directly or indirectly involved in its business activities ('stakeholders') are a determining factor for the continuous improvement of the company and for the realisation of projects of common interest. Such relations are therefore considered to be of great value for Wind Tre.

Contact takes place in various ways depending on the specific interested parties and is repeated several times during the course of each financial year. Most of the events allowing the company to talk and listen to stakeholders and to engage in dialogue are merely part of normal collaborative processes and are unrelated to reporting activities, but certain initiatives are organised specifically with a view to drawing up the sustainability report and developing the integrated management system.

The following are considered to be Wind Tre stakeholders:

- **Shareholders and bondholders**:
    - CK Hutchison Ltd and its management
- **Customers, public administration, and associations**:
    - Consumer and business customers
    - Public administration
    - Consumer associations
    - Sector associations
- **The community**:
    - Territorial and local municipalities
    - Italian villages
    - Tertiary sector
    - Universities and research institutes
    - Media and opinion leaders
- **Institutions**:
    - Regulatory bodies
    - National and local government bodies
    - Italian judicial bodies and public prosecutors
    - Law enforcement bodies (police)
- **Wind Tre personnel**:
    - Employees
    - External collaborators
    - Representatives and union organisations
- **Suppliers and commercial partners**:
    - Suppliers of goods, products, and services
    - Subcontractors
    - Direct and indirect sales network
- **Financial community**:
    - Banks

o   Institutional and private investors

o   Rating agencies

o   Insurance sector

At the end of 2021, the company launched a process for identifying the most relevant topics for stakeholders, directly involving stakeholders in the updating of the corporate materiality matrix and in the creation of scenarios and solutions for outlining the company's medium and long-term objectives as well as the scenarios in support of the sustainable development goals (SDGs) of the global agenda[8].

Through a comparison with the main companies in the sector at national and international level and based on a list of 250 topics as well as a relevance analysis and subsequent summarisation of topics, a set of 15 key topics was defined for discussion at a workshop to be attended by selected representatives of stakeholders. The 'workshop' format was chosen because it allows the representatives to directly discuss and agree upon the definition of the order of priority of the relevant topics.

The representatives to be involved in the workshop were selected based on the importance of each organisation as a Wind Tre counterpart and the degree to which the selected person was representative of the organisation. 18 representatives of the various types of corporate stakeholder[9], all of whom have their own special perspective and wealth of experience, skills, values, and relationships, participated in the workshop with the aim of defining the priority and importance of the relevant topics.

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

This process resulted in the identification of seven key topics – inspired by the most widespread of global reporting standards – for focusing the company's narrative and sustainability programme for the years to come and arranged the topics in accordance with the impacts considered by the company to be a matter of priority.

The 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 allow the company to exist and operate – and of certain essential values which have always been part of the company's DNA: closeness to customers and an ethical approach to all its activities.

Finally, by combining the enabling factors with the identified material topics with the CK Hutchison Group's sustainability framework and the most relevant SDGs, the company launched an internal discussion in order to develop its own ESG plan, made up of 10 objectives to be achieved between 2025 and 2030: 10 challenging objectives with the aim of eliminating any distance between people.

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[8] The company aims to renew the materiality by the end of the next financial year also to adapt it to the new multi-service company profile.

[9] The following representatives of the various types of interested stakeholder participated in the materiality analysis process: Four representatives of tertiary sector bodies, two representatives of the national and international world of finance, four representatives of large companies, five representatives of institutions (central public administration, research bodies, and universities), two representatives of consumer associations, and one press representative.

The ESG 2030 Plan

[GRI 2-4]

The ESG Plan is a programme concrete, measurable, and realised with the participation of all business areas which provides for a structured governance system with indicators and targets monitored quarterly. The Plan, made up of 10 objectives able to mitigate negative impacts and enhance the positive ones, in 2023, its second year of implementation, achieved most of its goals, with significant consequences not only for the company's reputation – as evidenced by the important awards won – but also in the form of an increased ability to create shared value at all levels of the company. There were two updates to the plan in 2023: two goals relating to the digital literacy of young people and seniors were merged into the single Goal 1 'Families 100% aware and protected', and a new objective relating to sustainability in the supply chain was introduced: Goal 3 'Sustainable supply chain'.

Description of material topics	Work area	Impact level	Impact description	Actions to mitigate the negative impact
Protection of minors in the digital environment Clearly and effectively providing younger and/or inexperienced users with tools for recognising risks posed by the Internet, protecting themselves against these risks, and generally avoiding any difficulties which might arise from the improper use of digital technologies.	More Responsibility	(-)	Vulnerability of minors when accessing the Internet without adequate digital preparation	ESG plan – Goal 1 'Families 100% aware and protected'
		(+)	Wind Tre has reached more than 1 million families with the 'NeoConessi' project, aiming to heighten awareness among the children involved about more appropriate use of digital resources.	
Cybersecurity and privacy Guaranteeing maximum data protection and continued investment in cybersecurity infrastructures to protect the company's data assets and sensitive customer data, ensuring 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 2 'Companies 100% secure'
		(+)	Wind Tre has consolidated its commitment to the digital protection of its public and private customers thanks to the security of its own infrastructures and the dissemination of protection services, offered to both	

			consumers and businesses.	
Digital divide Reducing the digital divide and the digital skills gap to the point of overcoming them 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.	More Humanity	(-)	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 1 'Families 100% aware and protected' ESG plan – Goal 8 'Smart partner of 100 smart cities'
		(+)	Wind Tre has consolidated its commitment to improving digital skills in territories in order to make administrations of the cities and small villages aware of the opportunities offered by digital technology. The aim is to expand access to the opportunities offered by the Internet with a focus on the population areas and groups which suffer most from the digital divide.	
Continuous digital learning 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 4 '100% future-ready people'
		(+)	Each year, Wind Tre adds to the portfolio of skills required to face change in order to prepare its own personnel, of all ages, for the new challenges of the	

			digital transformation.	
Inclusion of disability Listening and promptly responding to the needs of people with a disability, including through dialogue with the relevant associations and tertiary sector organisations. Offering people with disabilities a work environment that's tailored to their needs. Making our digital channels accessible to everyone.		(-)	Barriers to people with a disability participating in society on an equal basis	ESG plan – Goal 5 'Digital accessibility for people with disabilities'
		(+)	Wind Tre has enhanced its own contact channels using tools which facilitate the inclusion of people with a disability and help them to access digital information.	
Decarbonisation Reduction in directly generated CO_2 emissions and support for others in the reduction of their own emissions.	More Green	(-)	Failure to reduce atmospheric CO2 emissions and worsening of the climate risk.	ESG plan – Goal 9 '100% carbon neutral'
		(+)	Wind Tre has invested in major upgrades of its own network in order to achieve a substantial reduction in the climatic impact of its infrastructures and business activity. The company has also helped customers to reduce their own impact through the services it offers. Furthermore, Wind Tre is certified in accordance with ISO 50001 and ISO 14064 for improving the management of its CO_2 emissions.	
Smart technologies for society and the environment Facilitation of research and the creation of network infrastructures which support the dissemination of innovative technologies, tapping potential synergies with other sectors and essential services to bring about positive social and environmental impacts.		(-)	Delay in the development of enabling platforms and solutions for the digital and energy transitions	ESG plan – Goal 8 'Smart partner of 100 smart cities'
		(+)	Wind Tre supports the development and dissemination of services based on connectivity and digital technologies	

			which are capable of facilitating the twin transition and enters into partnerships with other companies and local administrations in order to enable this.	

The Sustainability Governance Model

[GRI 2-12, GRI 2-13, GRI 2-14, GRI 2-17, GRI 2-18, GRI 2-19, GRI 2-20]

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

In order to guarantee and monitor the implementation of the plan and the achievement of the anticipated performance levels, a **governance model has been created which covers every single level of the company and focuses on facilitating collaboration** between the various divisions. In 2023, Wind Tre also adopted an ESG policy which provides the guiding principles required to steer business activities in a way which incorporates social, environmental, and governance (ESG) commitments into the strategy and organisation of the company.

The individuals responsible for the implementation of the ESG plan were designated by the Management Team[10] when the plan was formulated. They are known as **sustainability ambassadors and consist of Wind Tre managers active in various company areas** who also coordinate the different divisions involved in the process. The ambassadors communicate with project managers to define the activities to be performed and interact with supporters to improve the coordination of activities within the various departments. The **sustainability project managers** – one for each goal – check that the activities for each goal have been carried out and monitor 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, more than 60 **sustainability supporters** play a key support role for the ambassadors and sustainability project managers by making sure that each department manager is up-to-date with regard to the implementation of the plan.

Each quarter, coordinated by 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 respective 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 period in question.

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.

The results of the ESG plan are also brought to the attention of the shareholder through periodic updates.

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[10] Wind Tre's Management Team is made up of the two co-CEOs and the managers of the various company departments, who report directly to them. For more information, see the chapters above and www.windtregroup.it.

To further strengthen the governance of ESG issues, at the beginning of 2024 the Company's Board of Directors approved the establishment of a Sustainability Committee, composed of members of the Board itself and the entire Management Team.

GOAL 10 – 100% closer

Goal 10 of Wind Tre's ESG plan is '**100% closer**', and aims to embody the company's purpose: to eliminate any distance between people and to be closer to Wind Tre's personnel, customers, and the community.

Also part of the annual and long-term incentive plan, Goal 10 monitors indicators relating to corporate reputation, staff engagement, and all activities pertaining to being close to communities as a company, such as collaboration with tertiary sector bodies and active participation in solidarity initiatives with the involvement of Wind Tre's personnel.

Goal 10 is the leading principle of all of the ESG plan goals, encapsulating the vision that drives the company to address sustainability issues.

In 2023, almost all the KPIs subjected to analysis to achieve the ESG objectives achieved the targets set for the year. Furthermore from 2022, the sustainability indicators linked to the ten objectives of the ESG plan have been introduced, both in the **short-term incentive plan (STIP)**, which has an annual time horizon, with the aim of engaging all Wind Tre managers, and in the **long-term incentive plan (LTIP)**, with a three-year time horizon. The ESG component has a weighting of 15% of all of the managerial incentive plans.

The process of rewarding [GRI 2-20]

The overall reward plan (fixed and variable remuneration) envisaged for senior executives (first line and second line of co-CEOs) is approved by the co-CEOs. Human Resources Management collects proposals from managers and formulates the rewarding concept based on external benchmark data (independent provider Willis Towers Watson) without the participation of a committee.

Once approved by the co-CEOs, HR 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 'repayments' indication (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. This agreement is valid until 2025.

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

For all other employees, the remuneration policy is managed by Human Resources Management and departmental managers (subject to the approval of the CEOs and always within the prescribed budget limits).

Together for a more sustainable future

Due to the need to keep people up-to-date on the activities initiated by all company departments on ESG topics and in keeping with the practice established in 2020, **all Wind Tre employees receive a sustainability newsletter**. The newsletter contains updates on the numerous initiatives which are currently in progress, useful suggestions to encourage the engagement of personnel, and updates and news items on issues that the company holds dear, complete with editorials by managers and articles by prominent personalities in the field of sustainability.

In 2023, an awareness and sensitisation project was launched to engage various company structures in discussion and dialogue in order to further spread the culture of corporate sustainability and the principles which inspire the ESG plan. '**On the Same Page**', which is managed by the Sustainability & Quality Certification team, addresses sustainability on the basis of the reasons which motivate the company to deal with the issue, with reference to the context in which the company operates and to the various scenarios which it has to face – from economic aspects to the matter of the company's reputation – in order to give tangible form to the actions taken through the ESG plan.

Many starting points for reflection and potential synergies between the involved management teams have emerged from the meetings, and awareness of the commitment of the company with regard to sustainability issues and how these issues are increasingly integrated into the company's business has grown.

In order to give customers and stakeholders the possibility of quickly acquiring an overview of Wind Tre's main sustainability projects and results, the **Sustainability Brochure** was created. This brochure, which is also available in a fully accessible version for people with a vision impairment, is published on the company website and has been distributed to selected stores.

2023 research reports

Once again in 2023, Wind Tre sponsored a series of studies and reports by major research centres, universities, and think tanks, mainly aimed at improving the dialogue surrounding the role that telecommunications (and digital technologies in general) play in relation to our society, the economy, and the environment. The company also produced podcasts on some of the most relevant issues.

The main publications of the year are shown below.

3rd Wind Tre-Censis Report: 'THE NEW PHASE OF DIGITAL LIFE IN ITALY'

The 3rd Wind Tre-Censis Report analyses and interprets clear dimensions of digital life which are nevertheless integrated into the everyday life of Italian society: the used connectivity and social significance for members of the public as well as the potential funding model to be used to ensure access to the Internet for all, without discrimination on the basis of economic factors. The report also analyses and interprets expectations and concerns on the part of Italians with regard to the most important new technologies of our time, starting with artificial intelligence (AI), a much discussed issue in today's world. As well as reiterating the importance of

ensuring access to the Internet without discrimination and of encouraging digital education to enable all Italians to use devices and web content competently, the report stresses the need for simple and effective communication about the opportunities and risks posed by the Internet and about the extraordinary digital technologies which are emerging.

1st Talk Future Lab I-COM – April 2023 – 'DA NIMBY A PIMBY: FARE INFRASTRUTTURE IN ITALIA' ('FROM NIMBY TO PIMBY: CREATING INFRASTRUCTURE IN ITALY')

This study analyses the current state of the telecommunications, energy, and transport infrastructure in Italy and – partly thanks to a survey of the main operators – takes stock of the process of simplifying authorisation procedures implemented in the last two years in order to facilitate the deployment of networks and structures and to achieve the objectives defined by the Italian Recovery and Resilience Plan (PNRR).

2nd Talk Future Lab I-COM – May 2023 – 'Il 5G TRA PERCEZIONE DEI RISCHI E IMPATTO SULLA COMPETITIVITÀ' ('5G: RISK PERCEPTION AND IMPACT ON COMPETITIVENESS')

The technological evolution of supply and demand has transformed telecommunications into an essential platform for supporting the digital transformation of the Italian economy. In particular, 5G is a driving force of extraordinary development on which the competitiveness of individual countries will become increasingly dependent. The need to seize these opportunities for growth and achieve European and national connectivity targets requires the acceleration of network deployment through the removal of obstacles and, therefore, not only the simplification of authorisation procedures but also the review of legislation on electromagnetic field limits, which has a major impact on the design and implementation of mobile network infrastructures.

3rd Talk Future Lab I-COM – November 2023 – 'I MODELLI DI BUSINESS DEL 5G: COME INCROCIARE DOMANDA E OFFERTA' ('5G BUSINESS MODELS: HOW TO ALIGN SUPPLY AND DEMAND')

The new digital technologies, above all artificial intelligence, are starting to ensure the increasingly vertical and horizontal, seamless integration of the entire product value chain, and one of the main enabling factors here will be 5G. The new communication standard allows operators to provide really high-capacity and low-latency wireless connectivity to a wide range of 'vertical' industries, opening up significant scenarios for the birth of new business models in all industrial sectors.

4th Talk Future Lab I-COM – December 2023 – 'MISURARE IL BENESSERE DIGITALE' ('MEASURING DIGITAL WELL-BEING')

Digitalisation is radically transforming the everyday habits of individuals, opening up a world of new recreational and professional opportunities. The transfer of much of human activity to the Internet brings with it – in addition to numerous positive effects – a new set of risks resulting from cybercriminals and from the complicated use of digital tools.

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).

In the first half of 2023, the first phase of the project was completed. The aim was to define and adopt a set of risk indicators for the main business processes ('key risk indicators' or 'KRIs').

As of the end of 2023, there are 33 business processes for which risk indicators have been identified. For 18 of these, the process of requesting and obtaining operating data for the formulation of statistics relevant to the risk identification process from the internal departments has started.

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 its 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

43%	93%	46%
The percentage of companies around the world that consider Ethics and Integrity to be a fundamental corporate value	The percentage of Italians who say they prefer to purchase from companies that have adopted ethical sourcing strategies	The percentage of company boards of directors which have an internal committee dedicated solely to the issue of sustainability
(Amo, 2022)	*(OpenText, 2021)*	*(Altis, 2023)*

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. In addition, the 'reporting revolution' currently facing the world of business[11] will not be merely an exercise in compliance; instead, it will be a way of acquiring an essential view of risk exposure and long-term prospects for the benefit of investors and management alike[12].

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[13]. Consumers, on the other hand, tend to place a greater focus on the relationship established with the supply chain: **6 out of 10 Italian consumers evaluate a brand based on its relationship with its suppliers**[14].

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[15]. 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.

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[11] In 2023 alone, the International Sustainability Standards Board (ISSB) published its first global standards, the European Union published the European Sustainability Reporting Standards (ESRS), and SEC in the United States worked on its own standards for climate disclosure. MIT Sloan Management Review Special Report: Sustainable Strategy: Rightsizing Goals And Assessing Impact, January 2024.

[12] MIT Sloan Management Review Special Report, see above

[13] Amo: Values Most Valued, 2022

[14] OpenText: Ethical Supply Chain, 2021

[15] Borsa Italiana: Corporate Governance Code for Listed Companies, 2020

Our commitment

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

Corporate governance

[GRI 2-16, GRI 2-23, GRI 2-24]

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.

Each of the subsidiaries completely belong to the Wind Tre Group, except for CKHH MSK 22 S.r.l., 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.

The Supervisory Body of each company – as part of its monitoring activity on the functioning of and compliance with the Organisation, Management and Control Model pursuant to Italian Legislative Decree 231/01 – **immediately reports any relevant critical issues encountered** (such as serious violations of the Organisation, Management and Control Model, Code of Conduct, and/or other company policies or procedures, serious violations of applicable laws, and received whistleblower reports received which initially appear to have significant repercussions economically and with a view to the company's reputation) to the Board of Directors, Chief Executive Officers, and Board of Auditors.

Even in the absence of any significant critical issues, as was the case with the January-December 2023 reporting period, the supervisory bodies periodically report on their work to both the Board of Directors and the Board of Auditors.

The Code of Conduct is the official Wind Tre Group document which contains the rights, duties, and responsibilities of Group companies with regard to 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 models are approved by the Boards of Directors of each company, communicated to all employees via a message from the Chief Executive Officers, and posted on both the company intranet and the corporate website, where they can be viewed by all stakeholders (https://www.windtregroup.it/en/governance/code-of-conduct-and-om.aspx).

All employees also formally undertake to accept and comply with the provisions of the Code of Conduct and model, both when they are hired (by signing a specific declaration) and whenever the code and model are updated (via an app on the company intranet).

Moreover, in line with Legislative Decree no. 231/01, current anti-corruption legislation, and national and international best practices, Wind Tre has adopted a series of policies and procedures (anti-fraud and anti-corruption policy, anti-fraud and anti-corruption guidelines for suppliers, Supplier Code of Conduct, conflicts of interest policy, due diligence procedure for business partners, whistleblowing policy, and a gifts and hospitality procedure) which have been approved by the Wind Tre S.p.A. Management Team[16] or by the company's CEOs and are referred to directly in the Code of Conduct, published on the intranet or on the corporate website, and communicated to all employees and (where applicable) to third parties. The anti-fraud and anti-corruption policy is also formally accepted by all the employees when they are hired through the signing of a separate declaration.

With regard to the policies which are directly applicable to third parties who have relations of any kind with Wind Tre, the aim of the Group is to work with partners who operate with full and absolute respect for the principles defined in the **Supplier Code of Conduct** and the **Anti-fraud and Anti-corruption Guidelines**. These documents are published on the company's website and are referenced in all contracts entered into with third parties. Compliance with the rules in the Supplier Code of Conduct and with the principles 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 of the companies in the Wind Tre Group, whatever the capacity and for all legal purposes.

With regard to **human rights**, Wind Tre is inspired by the principles laid out in the policies of the CK Hutchison Holdings Limited Group[17], the principles contained in the fundamental conventions of the ILO (International Labour Organisation) and the United Nations' Universal Declaration of Human Rights, and the provisions of the UK's Modern Slavery Act of 2015, as amended and supplemented; 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, specifically indicating all of the stakeholder categories to which it refers.

Finally, in accordance with current legislation and based on the guidelines issued by antitrust authorities with regard to the protection of competition, Wind Tre has adopted an **antitrust compliance programme** which all 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 significant advantages for the company, ensuring tangible benefits for the

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[16] The Wind Tre S.p.A Management Team has designated power of attorney in relation to its role as manager and coordinator of all the Group's companies

[17] The company is also working to implement the precautionary principle of the United Nations' Rio Declaration on Environment and Development in all of its corporate policies.

understanding and prevention of behaviour and actions which, in an extremely competitive market context, could lead to negative and punishable consequences not only for the company but even at individual level.

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

- ✓ Supervisory and monitoring activities by the Supervisory Body regarding the effective application of the Organisation, Management, and Control Model
- ✓ Periodic audits of business processes conducted internally and by the CK Hutchison Holdings Limited Group
- ✓ Half-yearly risk assessments of all company processes
- ✓ Periodic training about 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.

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.

Furthermore, in order to better align its own policies with the model of the parent company CKHH (https://www.ckh.com.hk/en/esg/esg_policies.php), in 2023 Wind Tre also adopted an **ESG policy** with the aim of providing the guiding principles necessary for steering business activities, striving to incorporate social, environmental, and governance (ESG) commitments into the strategy and organisation of the company in response to the needs of various stakeholder categories.

The fight against corruption and conflicts of interest

[GRI 2-15]

Conflicts of interest among the Board of Director members are managed pursuant to Article 2391 of the Italian Civil Code[18]. Also, as required by the Wind Tre conflicts of interest procedure, any actual or potential conflicts of interest on the part of a CEO must always be reported to the Audit, 231 Compliance & Risk Management Director and to the Director of Human Resources so that they can assess them appropriately. They must also be shared with the sole shareholder.

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 associated communication and management process. Using a special digital platform on the company's intranet, all employees must declare

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[18] 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 on behalf of a third party which is in conflict with that of the company, must notify the other directors and the Board of Auditors and must refrain from participating in deliberations concerning the transaction in question.

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** which describes the concepts and ethical standards to be respected during the management of the company's activities in order to mitigate associated risks and ensure compliance with the current standards and regulations, drawing upon the organisation's best practices. In 2021, Wind Tre adopted its **anti-fraud and anti-corruption guidelines for suppliers**, establishing the ethical principles and minimum control standards which all Wind Tre suppliers and any third parties involved in contractual relationships with Wind Tre must observe in order to prevent and combat fraud and corruption and to ensure 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. **267 due diligence procedures were carried out in 2023**.

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 2023, in-depth preliminary analyses were conducted on all donations and sponsorships carried out during the year, specifically: 8 donations, 26 sponsorships, 6 community projects[19], and 3 strategic initiatives aimed at improving Wind Tre's reputation and image in the social and environmental arenas in which it operates.

Whistleblowing

[GRI 2-26]

In 2023, the Wind Tre Group companies defined a whistleblowing management process in accordance with the regulatory provisions enshrined in Legislative Decree 24/2023 regarding the protection of individuals who report violations of European Union law and national legislation.

Specifically, the Wind Tre Group has drawn up two whistleblowing policies: one for Wind Tre Italia S.p.A., Wind Tre S.p.A., and 3Lettronica S.p.A., and the other for Wind Tre Retail S.r.l.

Both policies aim to promote a corporate culture which combats illegal practices through the active and responsible participation of all employees and, more generally, of all third parties which collaborate with the Group.

In this way, the company encourages its personnel and third parties to report potential violations honestly and transparently. Wind Tre does not tolerate retaliation, threats, or acts of discrimination against any whistleblower who makes a report in good faith.

In accordance with Group policies, the following occurrences may be reported:

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[19] By "community project" it is meant projects/initiatives which have among their objectives the creation of benefits for the community.

(i)   Violations or potential violations relating to any offence within the scope of Legislative Decree 24/2023, including but not limited to offences pursuant to Legislative Decree 231/01 and violations of organisational models, offences affecting areas protected by the EU (such as the prevention of money laundering, product safety and compliance, etc.), and violations of antitrust regulations, etc.

(ii)   Other violations relating to other offences **outside** the scope of Legislative Decree 24/2023. These include violations of the SA8000 Standard, violations of regulations such as the rules protecting the insurance industry (IVASS regulations), violations of the Code of Conduct and other internal policies and procedures, and cases of corporate fraud, etc.

Reports must always be made using one of the channels made available by the Group's companies and available both on the intranet and on the company's website (www.windtregroup.it).

With regard to reporting channels, the online platform – with its encryption system and advanced technological features – is particularly suitable for protecting the identity of the whistleblower and the confidentiality of the information supplied as well as ensuring anonymity at all stages of the process for managing whistleblowing reports as stipulated in Legislative Decree 24/2023.

Main regulatory proceedings

Compliance with laws and regulations [GRI 2-27]

REGULATORY ACTIONS OPENED OR CLOSED IN 2023[20]
Between the end of 2022 and 2023, six actions and requests for information were opened by the Italian Communications Regulatory Authority (AGCOM) and the Italian Competition Authority (AGCM). One of these was closed by AGCM without any sanctions.
The table below provides a summary:

PROCEDURE	AUTHORITY	SUBJECT	OPENING	CLOSURE	PENALTY
PS12303	AGCM	Invoicing after withdrawal	28/04/2022	31/03/2023	€ 300,000.00
3/22/DTC	AGCOM	Costs of withdrawal pursuant to res. 487/18/CONS	30/12/2022	26/07/2023	€ 464,000.00 sanction challenged with the Regional Administrative Court, judgement pending
I820	AGCM	Monthly billing with price modification	2018	09/2023	€ 36,000,000.00
4/23/DTC	AGCOM	Continuation of traffic despite insufficient credit/bundle	04/2023	05/10/2023	€ 680,000.00
PS12540	AGCM	Modification of contractual conditions with opt-in	03/2023	17/10/2023	NO for the archiving of the case
PS12659	AGCM	Unlimited offers	10/2023	-	In progress

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[20] The proceedings reported in the text are considered significant in relation to the company's Core Business.

The section below provides a short description of the measures which led to a sanction or are under active investigation.

Action regarding invoicing after withdrawal (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). In particular, it was alleged that Wind Tre would prevent or impede the termination of the contractual relationship by continuing to charge costs for services which the user had informed the company they no longer wished to use with the effect of forcibly prolonging the contract for an indefinite period or exposing the consumer or small business to paying for both the old and the new service provider in the case of a service provider switch. In its defence, Wind Tre stated that it had never engaged in any conduct which involved deliberately continuing to bill a customer who had deactivated their account or who had expressed a desire to withdraw from the contractual relationship, explaining that any indication to the contrary might be caused by a variety of reasons (missing or incomplete request on the part of the customer, system errors, etc.) Wind Tre notified the authority of a series of actions which had already been implemented to solve the problem. It turned out that, on the IT side, a system correction was required in order to enable the automation of the end of billing when a customer's line is terminated in the network. On the 31st of March 2023, AGCM notified Wind Tre of the concluding measure for the action, which took the form of a fine of €300,000. The initiatives mentioned above which had been taken by Wind Tre to address the problem positively impacted on the determination of the amount of the fine. As part of the same measure, AGCM asked Wind Tre to declare its compliance by providing, within 90 days, a report showing the steps taken to ensure that the challenged conduct would not be repeated. Wind Tre made the payment due and sent the report of achieved compliance within the allotted time period. A similar objection, and associated sanction, was imposed upon TIM (€200,000), Vodafone (€400,000), and Fastweb (€100,000). The difference in the fines is due to the different number of customers affected by the unintentional conduct.

Action AGCOM 3/22/DTC

On the 30th of December 2022, AGCOM notified Wind Tre of the start of a sanction procedure relating to costs charged to customers in the event of a contract withdrawal, stating the alleged violation of Art. 1 Para. 3 of Legislative Decree 7/2007 as converted into Law 40/2007, whereby Wind Tre was alleged to have charged excessive costs for the termination of contracts concluded both before and after the entry into force of Resolution 487/18/CONS.

Wind Tre rebuffed the objection of the authority and attested to the fact that Resolution 487/18/CONS does not apply for a number of reasons: 1) Article 101 of Directive (EU) 1972/2018 prohibits the introduction of provisions which might result in different protection levels for end-users; 2) Art. 1 Para. 3 of Legislative Decree 7 of the 31st of January 2007, converted with amendments into Law 40 of the 2nd of April 2007 and subsequently amended by Art 1 Para. 41 (a) of Law 124 of the 4th of August 2017 (the Competition Act), makes no reference to an average charge; instead, the average charge is an independent stipulation of Resolution 487/18/CONS; 3) Resolution 487/18/CONS and Directive (EU) 1972/2018 are practically contemporaneous, differing in that the first has internal and regulatory relevance whereas the latter is an EU standard. Thus, it would have been necessary, for some time already, to bring Resolution 487/18/CONS into line with EU legislation.

In any event, Wind Tre proposed – with the aim of bringing an immediate end to the conduct – manually (so without radical intervention to the company's IT systems) applying the average amount of 35 euros excluding VAT to all users exercising the right of withdrawal from the end of January 2023, in line with the minimum cost applied in the case of withdrawal from or transfer of services, and lower than that actually borne by Wind Tre. In addition, it increased transparency for customers by incorporating a huge informational campaign into its communications in order to increase information transparency with regard to withdrawal procedures and the associated processing times.

AGCOM, while welcoming the measures taken to increase transparency for customers, maintained that the conduct in question had not been eliminated, and imposed a fine of 464,000 euros with Resolution 183/23/CONS in July 2023.

Wind Tre – without capitulating – has complied by making the demanded payment and establishing a uniform withdrawal cost of 22 euros excluding VAT, reserving the right to replace this figure with the actual cost incurred if the company wins the case or in the event of the anticipated approval of a favourable regulatory change.

Sanction Resolution 183/23/CONS has been challenged and judgement is pending.

Antitrust Action I820 – MONTHLY BILLING WITH PRICE MODIFICATION

This action was opened in 2018 by the antitrust authority (AGCM/'the authority') and was closed in 2020 with a sanction imposed upon Fastweb, TIM, Vodafone, and Wind Tre for engaging in a competition restriction agreement (see the AGCM website for all relevant public details: https://www.agcm.it/dettaglio?db=41256297003874BD&uid=E9786BE0D9ADA3E1C1258504004FD57F&view=vw0301&title=I820-FATTURAZIONE%20MENSILE%20CON%20RIMODULAZIONE%20TARIFFARIA&fs=%20%2081_CE/101_CE-Intesa).

The original sanctions were as follows: Fastweb around €15 million, TIM around €114 million; Vodafone Italia around €60 million; Wind Tre around €39 million. Following the recent decision of the Council of State (July 2023), AGCM recalculated the original sanctions in accordance with the deadline set by the Council of State. For Wind Tre (Action 30794 of September 2023), the sanction was reduced to around €36 million (€3 million less than the initial fine). Wind Tre asked AGCM to allow payment in instalments without conceding the case. The sanction was calculated without considering the revenue for the ex-Wind customers and was reduced by around 7 million (as specified in the text relating to the action) thanks to the antitrust compliance programme drawn up by Regulatory Affairs.

Below are other issues which are considered to be particularly relevant for the company from a regulatory point of view.

Resolution 4/23/DTC

In April 2023, AGCOM notified Wind Tre of the start of a sanction procedure in relation to the continuation of traffic even for customers whose credit has run out through the bundle advance function, which is chargeable, in the case of insufficient credit for the monthly renewal of the offer, and the continuation of Internet traffic, also chargeable, when the bundle for the data component has been used up. In the opinion of AGCOM, the violation consists of failing to obtain the consent of the customer to the continuation of traffic through an express signature in the contract, and the contract should also provide for the possibility of excluding such a continuation of traffic. Wind Tre pointed out to the authority that the customer can easily exclude the continuation of traffic in this way by means of an automatic payment (SEPA, credit card, or automatic recharge) of at least sufficient credit for the recharge, considering that customers are sent a monthly reminder text message four days before the renewal of the offer or by taking advantage of the free upgrade to the 'Easy' prepayment plan. The company also pointed out that other operators use the same function. Despite this, on the 5th of October last year, Wind Tre was notified of Resolution 237/23/CONS, which consisted of a fine of 680,000 euros, which the company paid by the given deadline.

In response to this complaint, Wind Tre has acted to increase the awareness of customers about the characteristics of the offer and about the possibility of choosing other options which do not include the contested features. In particular, the company has added a detailed description of the characteristics of the function to its contract summary document and has clarified the existence of offers which do not have these features to customers, thus enabling them to knowingly accept or reject the advantages and limited economic commitments of the offer in question. In addition, through an information campaign in two national newspapers and the 'WINDTRE Informa' (WINDTRE informs) section of the company's website, Wind Tre has further increased customer awareness of the existence of the traffic advance function and of the easy possibility of switching at any time – without charge – to another tariff profile which does not work the same way if credit runs out.

AGCOM case no. PS/12540

In March 2023, AGCM launched Action PS12540, which was dismissed in October 2023 without the imposition of a sanction. The case objected to Wind Tre's unilateral change of conditions campaign (increase in cost along with an increased Internet component), which was conducted through a dual informational message to customers, giving customers the possibility of opting to retain their existing offer. This campaign was carried out in order to comply with the findings of a previous action resulting in a sanction of 5 million euros (concluding Action PS/12305, launched in April 2022)

With Action PS/12305, AGCM had previously objected to an alleged violation on the part of Wind Tre of Art. 65 of the Italian Consumer Code, which prohibits the consumer from being bound by an offer involving a payment supplementary to the remuneration agreed in the main contract without the express consent of the consumer having been acquired 'in advance'. The authority had contested the campaign for the modification of contractual conditions which was launched by Wind Tre at the end of 2021, whereby the customer – at the same time as the notification of the contractual change (increase in the monthly price of the offer and in the number of gigabytes) – could have benefited from the possibility of expressing their desire to retain the previous offer. This provision, as specified by Wind Tre, was a fully legitimate innovation, since it was entirely in favour of the customer: that is, giving the customer the power to return to the original plan, which had been lost at the moment of communication of the unilateral change. This possibility was additional to and completely positive in comparison with the right of withdrawal at no cost established by current legislation. Despite the arguments of Wind Tre and the legitimacy of the company's conduct, which was also confirmed by AGCOM, who gave AGCM an opinion fully in Wind Tre's favour, in November 2022 AGCM fined Wind Tre 5 million euros, which was subsequently challenged by Wind Tre before the courts.

AGCM Action PS/12659

At the end of October 2023, AGCM notified Wind Tre of the initiation of a sanction procedure in relation to the incomplete statement, on the WINDTRE app, of the restrictions set for the use of unlimited voice traffic. Wind Tre immediately changed the description on the app in line with the stated requirements in order to minimise the anticipated sanction, if not avoid it completely.

The case is currently pending.

28 days

With regard to the '28 days' legal proceedings, it should be noted that the proceedings have been closed from a regulatory point of view. However, the formal judicial proceedings remain open and pending.

Value Added Services

Wind Tre has taken several measures to remedy the illegal phenomenon of non-compliant VAS activations, even suggesting to AGCOM, in July 2020, that default barring (with the exception of carrier billing services, whose activation already provides for security requirements) be put into place for its customer base, and later ascertaining the same position, on the part of AGCOM, with Resolution 10/21/CONS. Wind Tre exited the VAS market in January 2022 after discovering incorrect management practices by the CSPs (content service providers) which led AGCOM to initiate sanction proceedings against all of 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 in line with Italy's consumer price index FOI, 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. Applying this change from January 2024 ensures that the procedure complies with the binding specifications of the authority. In this regard, on the 11th of April 2023, AGCOM published a press release announcing the imminent issue of a regulatory review – for public consultation – on a variety of topics including regulations on the adjustment of the fees on the basis of the consumer price index. This press release reports that the insertion of periodic adjustment mechanisms in line with the consumer price index into contracts must be expressly accepted by users. On the other hand, in the case of contracts that already provide for an indexing mechanism, the increase in the fee shall not constitute a unilateral change to contractual conditions, and therefore shall not give users the right to withdraw from their contract without a contractual penalty. The adjustment of fees in line with the consumer price index may be applied for the first time only 12 months after the start date of the contract and only after the prior publication of the price change by the company in question.

Our ESG goals

Goal	Horizon	Ambition	Courses of action	The point we're at
Sustainable supply chain	2025	To integrate environmental, social, and governance factors into procurement and decision-making processes	• Use of a special ESG assessment platform for the continuous evaluation of the sustainability level of the supply chain • Monitoring of improvement measures • Integration of ESG parameters into qualification scores • Definition of the rules to be used during supplier sourcing in order to realise energy-efficient, sustainable purchases in line with the decarbonisation plan and in accordance with the requirements of ISO 50001 certification	• 100% of registered suppliers assessed on the basis of environmental and social criteria • **59%** of registered suppliers assessed on the ESG platform

Sustainability in the supply chain

[GRI 2-6, GRI 308-1, GRI 414-1]

Knowing your own supply chain is the first step in establishing your corporate sustainability strategy, which is why one of the **10 goals of Wind Tre's ESG plan** is to achieve a **SUSTAINABLE SUPPLY CHAIN** and to integrate environmental, social, and governance factors into procurement processes and business decisions. **100%** of the company's registered suppliers are evaluated on the basis of **environmental and social criteria** and are selected on the basis of **adherence to SA8000 principles**. In July 2022, Wind Tre decided to join the **CRIF Group**, which supports the company in its sustainable transformation through the use of a **global digital platform**[21] capable of checking and monitoring the sustainability level of suppliers. By the end of 2023, **59%** of registered suppliers were registered on the ESG platform. The process requires suppliers who are invited to join the platform to answer a questionnaire in which they self-declare the measures taken to comply with ESG principles. The questionnaire consists of **five sections** (business, environment, social factors, governance, and industry), each of which has subsections with more specific content. The system then calculates an **ESG score** for each supplier and – based on the answers provided and the sector in question – identifies the main areas for development in accordance with their relevance and their impact on improving the sustainability of the company. Each supplier is asked to answer the questionnaire again in a year's time in order to monitor their progress. The platform's alert system performs checks on the information provided in the questionnaire, and any discrepancies are managed by a team of analysts who check the documentation and contact the supplier directly if necessary.

Wind Tre has a dashboard which allows it to analyse how suppliers are distributed for the various ESG performance indicators. This means that suppliers can be categorised in accordance with their sustainability level and development measures can be formulated.

Taking into account the difficulty of providing all of the required information for small and micro businesses, a simpler and more concise questionnaire which nonetheless includes all of the information necessary for reporting was developed. This was well-received based on the number of registrations. The concise ESG indicator is integrated into qualification scores and will become an assessment element for the selection of suppliers and the awarding of tenders.

 In 2023, Wind Tre had 645 qualified suppliers.[22]

As part of the SA8000 management system, Wind Tre performed a series of audits at the premises of a selection of suppliers in 2023.

During these audits, which were performed in order to check compliance with social responsibility criteria by the visited suppliers, best practices and common improvement areas with regard to the handling of topics covered by SA8000 were identified.

The vast majority of suppliers are based in Italy. The very small number of dispute cases testifies to Wind Tre's good relations with its suppliers.

Suppliers	2023	2022	2021	2020	2019
Total qualified suppliers (no.)	645	603	631	891	736
Qualified suppliers located in Italy (no.)	604	561	592	827	660

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[21] Through the Synesgy platform, Wind Tre suppliers receive a questionnaire made up of questions on the management of their impacts in the ESG areas tracked (Business, Environmental, Social, Governance, Innovation, Environmental Sustainability).

[22] 100% of new suppliers were evaluated on the basis of environmental and social criteria.

Qualified supplier based abroad (no.)	41	42	39	64	66
Active suppliers (no.)	645	603	631	891	736
Amount ordered (in millions of €)	1,242	1,421	2,187	1,830	2174

Disputes with suppliers (no.)	2023	2022	2021	2020	2019
Number of disputes with suppliers	2	2	3	4	5

The integrated management system

Wind Tre has adopted an **integrated management system** which engages all of the company's departments in core company areas in order to guarantee the quality of products and services, the protection of the environment and of 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 concepts.

During the course of 2023, Wind Tre achieved the three-year renewal of its certifications in accordance with ISO 45001:2018 and ISO 27001:2022 (for cloud services) as well as successfully passing the retention checks for its other six certificates.

Wind Tre's integrated system currently comprises eight certificates:

- **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 certifications for quality, the environment, health and occupational safety, energy, greenhouse gas emissions, and social responsibility apply to all Wind Tre locations[23], whereas the IT security certifications apply only to the data centres where the specific services are provided.

Increase in the EcoVadis rating for the third consecutive year

Companies are increasingly asked to provide customers and partners with timely information about initiatives, goals, and achievements in the three ESG dimensions (environment, social, and governance). This is one of the

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[23] All of the integrated management system certifications relate to Wind Tre S.p.A exclusively.

reasons why, in 2020, Wind Tre decided to join the EcoVadis network. EcoVadis is a global provider of corporate sustainability assessments.

The EcoVadis assessment focuses on four ESG areas: the environment, labour and human rights, ethics, and sustainable procurement.

In 2023, EcoVadis again noted a significant increase in Wind Tre's sustainability rating, which was 25% higher than the previous year, with growth in all four areas. In 2023, Wind Tre has consolidated the 'Advanced'[24] ranking and put itself **among the top 1% of companies in the telecommunications sector**.

Child protection in the digital domain

[GRI 3-3]

41%	40.7%	47%
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)	The percentage of children aged 11 to 13 in Italy who use social media (47.1% of girls in comparison with 34.5% of boys)	The percentage of adolescents aged 11 to 19 who say that they spend more than five hours online each day
(Istituto Piepoli, 2022)	*(ISTAT statistic for Save the Children)*	*(Generazioni Connesse, 2023)[25]*

In Italy, the development of connectivity has been somewhat delayed, and is subject to significant differences depending on location: between cities, rural areas, internal areas, and the various regions. In parallel, the spread of mobiles and smartphones has connected all of the population apart from the very young and very old. According to the findings of 'We are social 2023', 97.5% of the population between 16 and 64 years of age own a smartphone[26], and many studies confirm that the age when children get their first smartphone is getting lower and lower.

The COVID-19 pandemic brought about exponential growth in the ownership and usage of smartphones among children aged between six and ten, which increased from 18.4% to 30.2% between the two-year period of 2018 and 2019 and the two-year period of 2021 and 2022[27].

The well-being of children online is a priority of the European Union, which – thanks to the 'Better Internet for Kids' strategy – is co-financing safer internet centres (SICs) throughout Europe. The EU is organising awareness

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[24] The 2023 sustainability performances have been divided by EcoVadis into 5 categories: Insufficient, Partial, Good, Advanced and Outstanding.

[25] Generazioni Connesse, survey on the amount and quality of time spent on the Internet by children in Italy: www.generazioniconnesse.it/site/it/2023/02/08/il-30-dei-giovani-passa-pi-di-5-ore-online-la-ricerca-2023-/

[26] We are Social, 'Digital 2023, i dati italiani', January 2023, wearesocial.com/it/blog/2023/02/digital-2023-i-dati-italiani/

[27] 'XIV Atlante dell'infanzia (a rischio)' – Tempi Digitali https://www.savethechildren.it/cosa-facciamo/pubblicazioni/14-atlante-dell-infanzia-a-rischio-tempi-digitali

campaigns, providing training to families and schools, and running telephone hotlines to answer questions about how to react to dangerous contact in situations such as the grooming of children online[28].

In an increasingly connected world, where the boundary between the physical and digital dimensions is disappearing, how we manage initial approaches to the web and digital identity is becoming fundamentally important. Right from when children start accessing the Internet, it is vital to create **a digital environment for them which is as welcoming and secure as possible**. This requires an effort on the part of both institutions and 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.

Our commitment

- 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
- 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
- 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

Our ESG goals

Goal	Horizon	Ambition	Courses of action	The point we're at
Families 100% aware and protected	2025	To raise awareness among families – starting with children – about the safe and responsible use of technology and to actively contribute to the digital inclusion of older people by putting our purpose into practice	• Expansion of the NeoConnessi project through the involvement of a greater number of schools and the development of what the project offers through the addition of new teaching and training tools • Extension of the NeoConnessi project to the over-60s, with a dedicated part of the portal called NeoConnessi Silver and the offer of face-to-face training in small municipalities ('Connected Villages') • Information campaigns aimed at raising awareness about 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	• NeoConnessi: over 15,000 classes of children in the last two years of primary school throughout Italy, with a total of more than 1 million children reached since the project was launched • Launch of the 'NeoConessi Decalogue' – 10 steps for families informed and protected on the Internet • More than 4 million people reached by cybersecurity solutions • Launch of the Protection Service for minors, an online block on online access to apps or sites that are unsuitable or prohibited for minors on the Wind Tre network

The NeoConnessi project

The Internet and social media are now an integral part of young people's daily lives, offering countless resources for learning, engagement, and creativity but also posing a host of new challenges. The pandemic

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[28] https://www.betterinternetforkids.eu/

and associated closures of schools and businesses accelerated the massive use of technological tools, 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 which can arise from the improper use of these tools.

Since it was started, the NeoConnessi project, launched by Wind Tre in 2018, has involved over 1,000,000 families. It fosters joint deliberation by the three main players in the educational process (children, teachers, and families) as part of a synergy of objectives with regard to the safe and responsible use of the Internet and digital technologies.

In 2022/23, the project reached more than 7,000 schools, involving more than 15,000 classes of children in the last two years of primary school throughout Italy with a series of new tools for guiding children in a stimulating manner to discover the digital world and helping them to 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 safety on the Internet**. Reading the fairytale together – this year enriched with augmented reality and digital missions – and discussions in class and at home have provided food for thought as well as stimulating digital awareness.

To support the teaching staff, who play a key educational role, Wind Tre has again made a **free training course for teachers** available this year. The course was provided by La Fabbrica, a leader in the education and development of educational and training communication programmes for working with young people and families. More than 2,585 teachers participated in the course. This course is recognised by the Italian Ministry of Education and Merit (MIUR) and is valid for the purposes of in-service training recognition pursuant to Ministerial Decree 170 of 21 March 2016.

The project also provides the **NeoConnessi.it platform**, offering additional educational resources and interdisciplinary activities for teachers and parents. In addition, it offers the NeoConnessi Facebook group 'Genitori, Figli e Internet' (Parents, children and the Internet), a community where parents can discuss key NeoConnessi topics.

In 2023, the **NeoConnessi project was also introduced in the schools of the small Italian villages** involved in the 'Connected Villages project, which aims to promote the growth of small inland communities through educational projects, connectivity, and the development of smart technologies.

NeoConnessi – involved classes and pupils	AY 2022-23	AY 2021-22	AY 2020-21	AY 2019-20	AY 2018-19
No. of classes involved	15,220	14,052	5,140	digital edition	3,750
No. of pupils involved[29]	350,060	351,300	128,500	93,750	93,750

Furthermore, the '**NeoConnessi Decalogue**' was launched, setting out 10 steps for keeping families informed and protected on the Internet. These 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 making the Internet a safer place for children while at the same time facilitating their freedom to experience the digital world.

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

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[29] Calculated by multiplying the number of classes involved by an average number of pupils per class in accordance with the indications provided by MIUR (25 for the 2021/22 school year, 23 for the 2022/2023 school year).

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.

In addition, dedicated training facilities have been organised in the villages participating in the 'Connected Villages' project. These facilities were designed with the aim of reducing the digital divide and providing tools that enable the responsible and safe use of the Internet in the over-60 group, too. The training facilities, which also encourage the involvement of grandchildren – real little helpers – address issues such as fake news, using Google tools (Gmail, Google Maps, etc.), privacy, and online identity. Video tutorials designed specially for over-60s and available on the online neoconnessi.it platform are also used as a training tool.

Since Wind Tre is one of the major provider of Internet access, the company feels responsible for keeping people safe online. From this point of view, raising the awareness of parents about the hidden dangers of the Internet and helping them to support the responsible growth of Internet usage by their children are essential. This is why the 'NeoConnessi' project is trying to further enrich the benefits it offers through a course for parents. This course, 'Navigare insieme in sicurezza' (Navigating safely together), will be launched during the first part of 2024.

According to external reputation surveys, NeoConnessi's reputational return was consistently high throughout 2023; customers aware of the initiative demonstrated a strong tie to the WINDTRE brand.

Online protection for the entire family

Ensuring a safe online experience is one of Wind Tre's fundamental values and is one of the ways in which the company constantly strives to be much closer to its customers in a world in which the threats posed by the Internet are constantly evolving. The company's goal is to offer solutions aimed at the security of devices and the safety of the entire family.

Wind Tre offers two protection services for mobiles: **Più Sicuri Mobile** (More Secure Mobile), which is also available for professional customers with a VAT ID, and **Più Sicuri Mobile Pro** (More Secure Mobile Pro). These services are designed to protect smartphones from Internet risks through various functions:

- ✓ Warning page on the Wind Tre network when users attempt to access malicious websites
- ✓ Protection is activated immediately once the option is activated
- ✓ Report of threats blocked on Wind Tre app

The 'Più Sicuri Mobile Pro' version also provides the following:

- ✓ Secure browsing on all Wi-Fi networks
- ✓ Antivirus software with malware scanning
- ✓ Password and account security check
- ✓ Blockage of advertising banners and tracking cookies

For Wind Tre fixed line customers, the **Più Sicuri Casa & Ufficio** ('More Secure Home & Office') service allows safe surfing at home. With this service, all devices connected to the Wi-Fi network of the fixed line connection (PCs, tablets, smartphones, smart TVs, smart home automation devices) are protected from phishing, viruses, malware and malicious links.

In November 2023, Wind Tre also launched its **Child Protection** service, which places a network block on online access to apps or sites which are not suitable for or are prohibited to underage users in the Wind Tre network. This service is activated automatically and free of charge by the company on Wind Tre SIM cards with a dedicated offer for or in the name of minors. It is usable on both mobile and fixed networks. The service can be activated on request on adult SIM cards and is available and preprepared on all Wind Tre fixed network lines. It can be used by performing easy configuration steps on the household modem. The service is offered in compliance with AGCOM Resolution 9/23/CONS and blocks content in the following categories: adult content, gambling/betting, weapons, violence, hate and discrimination, promotion of practices that can be harmful to the health according to accepted medical knowledge, anonymisers, and sects and cults.

Finally, the **Wind Tre Family Protect** app provides a parental control service targeted at parents of under-14s. Once the app has been installed on the phones of both parent and child, the parent can monitor the amount of time their child spends on their phone, enable parental controls where they see fit, and check their child's exact location. 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.

Wind Tre strives to **constantly develop its offerings** in line with market trends **in order to keep Wind Tre customers safe in the light of evolving Internet threats**.

Cybersecurity and privacy

[GRI 3-3]

230	**86%**	**€1.86 billion**
The average number of monthly cyber attacks in Italy *(Clusit Report, 2023)*	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)*	The value of the Italian cybersecurity market in 2022, +18% compared to 2021 *(Osservatorio Politecnico Milano, 2023)*

The current geopolitical landscape is characterised by complex dynamics of strategic competition, accelerated by international crises, against a backdrop of invasive and destabilising communication strategies. The security of nation states and the international community poses a challenge which is rapidly evolving in an increasingly complex manner given that the development and fast circulation of new technologies also gives rise to real difficulties with regard to the growing use of information – or misinformation – campaigns which greatly expand the concept of 'threat'.

In this context, cybersecurity has come to play an even more central role than in previous years.

The significance of these threats has also led to an increase in awareness of and attention to IT security issues on the part of companies, and not only by ICT managers. Business leaders have also started to devote more

resources to cybersecurity, not only in terms of technological investments but also in order to educate and train internal personnel about risks arising from IT threats and to compensate the experts needed to address the most critical attacks.

Against this background, telecommunications service providers continue to play an essential role, since they represent the gateway to the web for families and businesses and are the custodians 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**, and in terms of knowledge, through the **continuous and rigorous training of internal 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.

Our commitment

- Investing in a cybersecurity infrastructure to protect the data of customers
- Offering services designed to help corporate customers to handle the digital evolution of their businesses safely
- 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

Goal	Horizon	Ambition	Courses of action	The point we're at
Companies 100% secure	2025	To protect our business customers with our cybersecurity and data protection solutions	- 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** for analysing the customer's security status and identifying 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 which can be exploited by an attacker	19 million euros invested in 2023 alone for improved network security, customer solutions, and the cloud transition - Security by Design: improved risk prevention and mitigation processes - Almost 70 thousand companies reached by our IT security solutions - Human Factor: the Wind Tre people training to develop a Cybersecurity Mindset - Numerous on-site audits with external privacy officers

Focus on data security

[203-2]

With the exponential increase in the amount of data exchanged between companies and users who interact with digital infrastructures, the number of cyber attacks has 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[30] and the resilience of critical infrastructures. Wind Tre's collaboration with the institutional bodies responsible for cybersecurity therefore continued in 2023, 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 2023 alone, Wind Tre's direct investments in services and platforms for data and system security amounted to approximately 19 million euros[31]. These investments focused on the following main lines of development:

- **Network security** – Wind Tre has combined its platform distribution activities with a structured testing plan (vulnerability assessments/penetration tests) with the aim of bolstering security measures in order to protect the network systems.

- **Service continuity** – Wind Tre has defined a structured disaster recovery process that leverages the resilience capabilities of the network and IT systems to ensure optimum service continuity. Ensuring continuity primarily serves to strengthen business, provide assurances to customers, minimise the potential impacts of any faults or natural events, and 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 internally, 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.

In 2023, Wind Tre continued to **bolster its risk prevention and mitigation processes by implementing Security by Design principles**, which means, wherever possible, providing for security criteria appropriate to the level of exposure of the data of the company and its customers right from the initial requirement definition stages. These same principles are implemented throughout the supply chain, where specific security checklists are used to verify that the suppliers have also adopted specific data protection measures.

In this regard, the 2023 acquisition of RAD – an Italian company specialising in cybersecurity solutions designed and built to respond to the IT security demands of small, medium-sized, and large businesses – was important. Through this acquisition, Wind Tre confirmed its commitment to the cybersecurity of Italian companies in line with the 'Company 100% secure' goal of its ESG plan and with its business services growth strategy.

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[30] Law 133/2019 and subsequent prime ministerial decrees

[31] Value refers to the total capital expenditures (CapEx) and operating expenses (OpEx)

More and more awareness

Digitalisation has led to an increase in the number of cyber attacks 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.

The main initiatives implemented are as follows:

- **Cybersecurity portal** on the corporate intranet: a dedicated area with quick access to essential cybersecurity information with the aim of spreading awareness and providing real-time updates, containing useful tips about how to act responsibly and responding to everyday concerns about the use of IT tools. The portal includes links to relevant policies to consider in order to reduce risks arising from misconduct or rash behaviour. The portal is updated as and when new information which is useful for sharing with the entire company becomes available.
- **Training pathway for all Wind Tre people** on the corporate e-learning platform for all employees: a mixture of e-learning, webinars, and gaming along with intermediate and final tests, with a focus on active learning through gaming. Project realised by the Polytechnic University of Milan in coordination with HR. Training has been structured into six personalised modules about information security, phishing and social engineering, authentication, navigation, workplace security, and a refresher on internal Wind Tre policies.
- **Awareness initiative about the content of business continuity** and the Wind Tre framework to be enjoyed by the entire company on the e-learning platform: clip with voiceover about the general principles of business continuity, the advantages for a business of having a continuity framework to support its critical processes, information about the Wind Tre framework.
- **'Pillole formative'** training modules distributed to the internal sales force and external business partners (agents, agencies, telesellers); training distributed to the supplier in charge of the security control room services (the security control room is the center for supervising alarms from security systems on Wind Tre sites and the 24/7 contact point for communications relating to emergencies) for independent provision to the staff assigned to them.
- **Video on cybersecurity on the intranet** to increase employee awareness about cybersecurity issues, acted out by two colleagues from the security team in order to better reach the target audience. The main topics covered include the growth of cybercrime, the objectives of attacks, the importance of the human factor, and ways to protect yourself and your business. The video can still be viewed on the cybersecurity portal of the corporate intranet.
- **Company talks** (regular company events to be attended live on the intranet or to catch up on later about various topics of interest to the company) about cybersecurity to increase knowledge about the digital world and remind participants about the good practices which can protect us from the consequences of cyber attacks.
- **The identification, in all corporate departments, of contact persons for security matters**, with the role of promoting and disseminating the culture of cybersecurity in their respective areas (called '**cybersecurity evangelists**'). These 'evangelists' support the

security teams by communicating cybersecurity issues in their own departments, finding out requirements, providing and disseminating information, and raising awareness. Regular series of meetings are held to collect input and transfer knowledge, and the evangelists actively participate in the short training sessions delivered in Teams to specific groups of the corporate population.

- **Short awareness meetings for selected employees** from various company departments with the aim of focusing on the importance of the human factor as a risk for the security of company information and sharing the activities and tools made available by the company to reduce the risk level by increasing the awareness of participants. The cybersecurity evangelists are involved in these meetings in order to strengthen their role as a point of contact and a link between the individual departments and the security teams.
- **Phishing campaign** directed at around 5,000 selected employees in the various departments of the company with the aim of raising awareness about the phenomenon of phishing among the corporate population by arranging for fake phishing e-mails to be sent to users with a range of sending patterns and variable complexity.
- **Ongoing awareness actions** targeted at all employees through the sending of sensitisation e-mails to alert employees to phishing attacks linked to specific events, make timely announcements to all employees about various topics (for example, information about policy updates, rules on individual topics, other security issues, etc.), and share communications on specific security issues with employees in order to increase awareness about security risks.

By paying attention to changes to national cybersecurity regulations and interacting with the competent authorities, Wind Tre constantly adapts its processes in order to implement increasingly effective measures for preventing and responding to cybersecurity attacks in full compliance with the said 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 increase the resilience of processes, Wind Tre has developed a **business continuity framework** over several years. The term 'business continuity' means the ability of an organisation to continue to deliver its products or services at acceptable predefined levels following adverse events which might 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, of the Privacy Code as amended by Legislative Decree 101/2018 as well as the Provisions issued by the Privacy Authority, including the introduction of new cookie guidelines, after which Wind Tre updated its cookie policy.

During the course of 2023, Wind Tre has launched 13 internal assessments in order to verify compliance with national and European privacy legislation, as well as the obligations required by the provisions of the Privacy Authority and consequently provide the actions to be implemented and adopted to protect the personal data of its customers.

In particular, Wind Tre conducted an internal assessment of the company's processes and procedures as well as the processes and procedures associated with partners it has appointed as external data processors, with a view to adapting and supplementing the provisions of the new Code of Conduct for telemarketing and teleselling as approved by the Italian Data Protection Authority ('Garante Privacy') in March 2023 and to alignment with the Code of Conduct on telemarketing and teleselling approved by AGCOM.

For this purpose, the revision of contracts, policies, and work instructions in place with partners is currently being finalised.

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[32].

During the course of the year, **the company paid greater attention to critical infrastructures, implementing new monitoring and verification processes** in line with national security regulations and, in particular, with the measures for ensuring the security and integrity of electronic communications networks and the reporting of significant incidents established by the Ministry for Economic Development (now called the Ministry of Enterprises and Made in Italy or 'MIMIT') in 2018 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. Supervisory activities on site, resulted in the sending to the affected Partners of a report containing the non-conformities found during the activities and the remediations to be adopted in order to comply with current privacy legislation and the instructions given by Wind Tre. Customer reports, including those received by the Authority, are also regularly answered.

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[32] The self-assessment campaign for 2023, open to all third parties appointed as data processors in June 2023, came to a definitive end in January 2024.

Inspections by the Data Protection Authority (no.)	2023	2022	2021	2020	2019
Number of inspections	0	1	0	0	1

The inspection activity performed by the Italian Data Protection Authority on the 10th and 11th of October 2022 had its basis in reports received from customers about telemarketing/teleselling undertakings. The associated checks have not yet been concluded. The company has been asked to provide further documentation for the ongoing investigation.

Privacy-related checks on suppliers (no.)	2023	2022	2021	2020	2019
On-site audits	375	296	67	13	8
Verification questionnaires administered to external suppliers	482	525	466	321	258
Verification questionnaires are sent to Wind Tre's sales agents and points of sale	4,910	4,955	4,884	6,017	6,527

*(including suppliers, agents, agencies, tellsellers, and dealers)

For the purpose of accountability, Wind Tre delivered eight training sessions on privacy and the safeguarding and protection of personal data both internally and to external partners in 2023.

In the interests of transparency, Wind Tre reports any events which could potentially result in a data breach to the Italian Data Protection Authority[33].

Should accidents occur, Wind Tre undertakes to prevent any potential loss or damage to the data managed, to limit damages, and to restore normal business operations as quickly as possible.

Data breaches and notifications of proceedings from the Guarantor authorities [GRI 418 1a, 1b]	2023	2022	2021	2020	2019
Events detected by Wind Tre	5	2	4	3	7
Actions formally notified to Wind Tre by the Italian Data Protection Authority	2	1	0	1	1

Potential data breaches reported to the Data Protection Authority

The following data breaches were reported to the Italian Data Protection Authority in 2020:

- POS_NG: A violation concerning unauthorised accesses to the POS NG system (a Wind Tre system used by authorised resellers to manage the sale of mobile and fixed network products and services to consumers and micro business customers), carried out using the logon credentials of a Wind Tre dealer, using e.g. 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 accesses on a web tool developed and managed by the supplier eGlue as a Wind Tre data processor were revealed.
- 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 drawing up and processing data relating to payslips and the sending of payslips, had accidentally sent payslips to the wrong recipients due to human error.

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[33] The company did not find any substantiated complaints for the reporting period.

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 Italian Data Protection Authority formally notified the company that it had closed the action relating to the notified data breach since it considered that the security and remediation measures implemented immediately at Wind Tre were such that no rights of the data subject had been compromised.
- ETHENET003 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. This event does not appear to have resulted in the disclosure of personal data held by Wind Tre S.p.A., and the supplier tells us that analyses are still ongoing in order to determine the extent of the impact on personal data held by Wind Tre S.p.A. The Italian Data Protection Authority has closed the action relating to the Network Contacts breach. The action will probably be closed for Wind Tre, too, since the breach took place in the provider's systems

The following data breaches were reported to the Italian Data Protection Authority in 2023:

- Four POS NG data breaches, communicated to the Italian Data Protection Authority on 21/07/2023, 15/09/2023, 02/10/2023, and 06/10/2023. The cause of the violations was a social engineering attack aimed at obtaining the credentials required to access the POS NG system used by the Wind Tre sales force. Wind Tre detected a suspicious number of mass actions generated by some of its dealers. Prompt joint analyses revealed that the mass actions in progress involved searches for multiple sequential phone numbers in specific number ranges. These searches were probably sent by a bot, using the system after having logged on in the proper manner with all of the required authentication factors.
- 1. MICROSOFT data breach, communicated to the Italian Data Protection Agency on 02/09/2023. It was revealed that two company accounts, belonging to two Wind Tre employees, had been compromised through Microsoft's online reset password function. The attack was accomplished following a fake telephone call (imitating an automatic Wind Tre technical support service) to the victims in order to obtain the one-time password sent to them by SMS. In both cases, the attack was detected quickly and was managed by Wind Tre through the blocking of the accounts in question. It turns out that the attackers used one of the two compromised accounts to generate a list of all of the users in the organisation in the Azure Active Directory. This activity was revealed by the Microsoft technical support team, which was promptly contacted by Wind Tre to perform attack analyses in back-end systems which cannot be accessed by Wind Tre.

'Please Don't Call' protects customers from unwanted calls

The protection of connections and of digital life forms part of the concept of digital responsibility, a topic which Wind Tre has decided demands top commitment. With a desire to **help its customers to protect themselves**

from unsolicited calls, the company has developed its 'Please Don't Call' service. This **simple and completely free** service for private consumers can be activated via the WINDTRE app and allows users to screen calls which might not be wanted before answering, thus allowing them to choose to ignore the call.

Wind Tre is constantly working to keep the database up to date, partly helped by 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. In 2023, Wind Tre changed its process for updating the database of numbers by increasing the update frequency from every two hours to every half an hour. This process is automatic and does not require updates by customers. In 2024, Wind Tre will continue to keep the database up-to-date at all times and will work to increase the number of customers who use the service.

Also in 2023, the service was publicised by means of an advertising campaign shown on the main television channels with the aim of raising awareness about the 'Please Don't Call' concept. The campaign told a story focusing on the protective role of the service – particularly at delicate times, during relaxation, and when at work – in accordance with the idea of closeness as expressed in the company's purpose.

The service is also available for VAT-registered professional customers. As of the end of December 2023, around 1.7 million customers had enabled the service and used it least once.

Closer to our customers

63%	90%	93%
The percentage of people who say they agree with sharing their personal data in exchange for a personalised service	The percentage of organisations who agree that being able to offer an excellent customer experience positively influences profit	The percentage of people who claim to spend more with companies which personalise customer service
(BearingPoint, 2023)	*(Global customer exp report, 2023)*	*(Gitnux, 2022)*

Customer experience refers to the sequence of interactions between a customer and a brand through a series of contact points throughout the customer's journey. In recent years, it has become increasingly important for companies to be able to interact with their customers as well as possible, since customers do not simply purchase goods and services but also pass judgement upon the brand on the basis of the experiences they have. **Consumer expectations are becoming more demanding** and, more importantly, more fluid in various product and service categories.

A company which establishes strong, robust, and lasting relationships with its customers can have a really positive impact on consumer choices and the resulting consumer confidence.[34] The stronger the relationship, the more a consumer will promote the brand in question, perhaps even to the extent of forgiving it in the event of a negative experience. Today, more than ever, customers expect transparent communication (on prices, conditions, and service modifications), efficient supply (fast deliveries and real-time information), and personalised experiences (offers, content, and tailored products). Even at the cost of passing on their valuable

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[34] INGO GROUP: L'impatto della customer experience sulla crescita dei brand, 2022

personal data. In a survey by BearingPoint[35], 63% of respondents said they were happy to share their personal data in exchange for a personalised service.

Creating strong bonds and ensuring a good customer experience is therefore not merely a matter of responsibility but is also the most effective way to ensure the loyalty of existing customers and acquire new ones. Interest shown by customers in sustainability when choosing a particular brand plays a key role in these new expectations. In the survey cited above, 83% of respondents said that they assessed companies on the basis of their social commitment, and 47% claimed that they considered social and environmental responsibility a key criterion when deciding whether to buy a product or service from a specific company.[36]

Our commitment

- Offering outstanding customer experience in order to enhance customer relations with a view to top reliability and transparency
- Being ready to constantly improve the services offered to customers, even by promoting an attentive dialogue with the consumer associations
- Offering customers a unique experience through multiple contact channels
- 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 is not limited to the purchasing phase; it is also dependent on the dialogue which can be established with the customer throughout each stage of the relationship: prior to purchase, during the finalisation of the business agreement, while the supply relationship is in progress, when any problems arise, or when communication needs and habits change, all the way to the conclusion of the contractual relationship.

The main objective of **Wind Tre's customer care is to offer the customer an experience which is a simple and consistent as possible** – with regard to the information requested and the assistance received – through the various contact channels. With these purposes in mind, in 2023 Wind Tre continued to deliver information and enable transactions through vocalbot and chatbot, which are not limited to providing simple information or responding to generic questions, but, through integration with the CRM, are able to provide specific information support with respect to the customer's situation as well as allowing him to resolve autonomously, with the guidance of the vocalbot and chatbot themselves, certain situations that concern it.

In 2023, Wind Tre had 16 call centres dedicated to providing customer service to consumer and business customers. Consumer customer service can be reached by dialling 159, while WINDTRE BUSINESS customer service can be reached on 1928. Very Mobile[37], another brand of the CK Hutchison Holdings Ltd Group to which Wind Tre belongs, also has a dedicated customer service number, 1929.

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[35] https://www.bearingpoint.com/en/insights-events/insights/customer-experience-2023/

[36] BearingPoint survey cited above

[37] Very Mobile, a brand of the CK Hutchison Holdings Ltd Group to which Wind Tre belongs, is fully operated by Wind Tre and therefore falls within the scope of reporting.

Wind Tre is aware of the fact that trust afforded by customers and the establishment of good relationships with them are beneficial to the company's growth and development. Wind Tre therefore pays special attention to 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.

Customer support service		2023	2022	2021	2020	2019
Contact by telephone (no.)	Business	1,623,986	1,552,258	1,290,131	1,351,045	1,531,256
	Consumer	13,445,403	14,166,965	17,286,278	20,863,116	26,925,442
	Total	**15,069,389**	**15,719,223**	**18,576,409**	**22,214,161**	**28,456,698**
Support requests received by the specialised technical assistance groups (no.)	Business	489,880	472,796	311,625	313,891	348,053
	Consumer	**2,093,786**	2,238,046	2,647,223	3,022,218	3,452,840
	Total	**2,583,666**	**2,710,842**	**2,958,848**	3,336,109	3,800,893

Customer satisfaction

With a view to ensuring a high-quality service over time and aligning its corporate strategies with the needs of customers, in 2023 Wind Tre measured customer satisfaction on a scale of 1 to 10 via market-specific (fixed, mobile, consumer, and business) telephone surveys performed by an independent third party on a representative sample of customers.

In the case of mobile consumers – the largest market segment in terms of both the number of customers and turnover – the survey was performed semi-annually, with 1,400 interviews carried out on a representative sample of users selected by geographical area, contract type (prepaid or subscription), nationality, data usage method, and existing length of contract. The overall results showed **customer loyalty of 8.46 among Wind Tre** and 8.98 among Very Mobile customers, with **an overall satisfaction rating of 8.14** for Wind Tre and 8.59 for Very Mobile.

As of the start of 2023, word-of-mouth value has been removed from the surveys, since it is linked to the net promoter score (NPS), which is no longer used as a customer satisfaction metric.

The results of surveys prior to 2023 were influenced by contextual situations determining certain negative trends which were remedied by targeted management strategies. Consequently, Wind Tre's indicators are practically all improving, while Very Mobile's indicators are fairly stable.

Results of mobile consumer customer satisfaction analyses (surveys performed by Doxa, scale of 1-10)[38]	WINDTRE				
	2023	2022	2021	2020	2019
Overall satisfaction	8.14	7.9	8.1	7.97	7.78
Rates	7.83	7.69	8.02	7.94	7.61

[38] The reported data refers to the second half of the year for 2023, for the previous data to the fourth quarter of the year.

Customer Value Management	7.27	7.01	7.01	7.31	7.01
Customer Care Services	7.29	6.51	6.78	7.27	7.58
IVR - Interactive Voice Response	7.25	6.56	6.8	6.81	7.35
Call Centre operator	7.57	6.86	7.16	7.77	7.9
Customer loyalty	8.46	8.32	8.62	8.51	8.24
Tendency for 'word of mouth' recommendations	-	8.01	8.06	7.86	7.79
Advertising effectiveness	7.91	7.98	7.95	8.06	8.05

Results of the Mobile Consumer Customer Satisfaction analyses (Scale from 10-100)[39]	VERY MOBILE			
	2023	2022	2021	2020
Overall satisfaction	8.59	8.63	8.59	8.82
Rates	8.61	8.78	8.96	9.2
Customer Value Management	8.24	8.12	8.87	8.45
Customer Care Services	7.85	7.97	7.8	8.15
IVR - Interactive Voice Response	8.05	8.19	7.58	7.55
Call Centre operator	8.43	7.69	7.9	8.33
Customer loyalty	8.98	9.12	9.03	9.36
Tendency for 'word of mouth' recommendations	-	8.92	8.57	8.83
Advertising effectiveness	8.21	8.47	8.37	8.6

Reputation analysis

Reputation can be understood as an emotional bond which is based on respect and trust in a brand, and is an important factor for predicting support from various stakeholder categories. It is influenced by factors which 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 2023, Wind Tre measured its reputation regularly through surveys conducted by a specialist third-party company. These surveys are based on interviews carried out on significant samples of the Italian population consisting of both customers and non-customers. 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.

During the course of the year, Wind Tre strengthened its positioning across the major part of the reputation profile, composed by 7 monitoring areas:

1. Products and services, assessing the company's offering of outstanding, high-quality, reliable products and services
2. Innovation, assessing whether the company is innovative, offers innovative products and services, or is innovative in its actions
3. Workplace, assessing whether the company offers a workplace which is attractive, provides equal opportunities, and fairly rewards employees
4. Conduct, assessing the behaviour of the company and whether it acts ethically and is open and transparent

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[39] The reported data refers to the second half of the year for 2023, for the previous data to the fourth quarter of the year.

5. Citizenship, assessing whether the company has a positive influence on society, supports worthy causes, and protects the environment

6. Leadership, assessing whether the company has strong leadership, has a clear vision of the future, and is well organised

7. Performance, assessing whether the company delivers better than expected financial results, is profitable, and shows strong prospects for future growth

seeing particular growth in the products and services area (+2,5 pts. from the beginning of the year), driven by the ability of the company to meet the needs of its customers (+3,3 pts. from the beginning of the year). The year finished on a high note, with positivity peaking in November.

The 2023 surveys – while influenced by a large number of general contextual factors and performed in a sector which is extremely sensitive to price dynamics – demonstrated the strategic role which issues relating to the product, service quality, value for money, the satisfaction of customer requirements, sustainability, ethical conduct, and transparency can play in the creation and differentiation of a company's reputation. Some of the activities implemented, such as the entire ESG plan and also the NeoConnessi, Wi-Fi Calling, Please Don't Call, Smart City, and Connected Villages projects, and – finally – the multi-service strategy illustrate this and create perfect conditions for the future. The reputational analysis of the people who know these activities demonstrates that they have contributed positively to the growth of many aspects linked to the areas indicated previously. For 2024, Wind Tre is committed to continuing to communicate its service expansion strategy, since this is one of the company's activities which offers the best returns in terms of reputation, resulting in an increasingly positive image of Wind Tre and making its mark on the company in line with the company's purpose.

Informed and safe

Always attentive to its customers' digital security, several years ago Wind Tre launched its '**Informati e Sicuri**' service. It provides a free hotline (800 900 134) dedicated to safe surfing where customers can tell customer care operators about disputed operations and report information relating to IT security, such as phishing attempts. Wind Tre launched this initiative with the aim of being increasingly close to customers so that they can enjoy beneficial surfing with no nasty surprises. Wind Tre has always placed its customers at the centre of its operations. With this free hotline, it aims to allow customers to play an active part in handling malicious practices used by hackers on a daily basis on the Internet so that surfing and buying goods and services online is as safe as possible.

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.

With Law 206/2021, the Italian Parliament delegated authority to the government with regard to **the efficiency of the civil process and the review of regulations relating to alternative dispute resolution instruments** as well as a series of urgent measures for the streamlining of procedures concerning the rights of persons and families and enforcement.

With Legislative Decree 149/2022, implementing Law 206/2021, the 'Cartabia Reform' was implemented: As of the 1st of March 2023, the first new procedural rules aimed at simplifying the procedures ahead of the Justice of the Peace and Court came into force progressively.

In order to reduce the case load, the legislature has extended the scope of application of **compulsory mediation** by stipulating that the use of preventive mediation shall become compulsory for disputes relating to **supply contracts**, too.

As a general observation, it should be noted that during the course of 2023, due to the entry into force of the aforementioned reform, a partial decrease in judicial activity was seen as a result of uncertainty concerning the application of the new legislation.

Mediation proceedings/disputes handled before Co.Re.Coms (regional communications committees)/AGCOM/Chambers of Commerce, Industry, Handicraft, and Agriculture		2023	2022	2021	2020	2019
Mediation requests submitted to Co.Re.Coms (reporting year)		12,232	11,768	16,980	23,035	26,408
Solution agreed upon between the parties (% volumes handled during the reference year)		86%	84%	80%	81%	80%
User request for the Authority or the Co.Re.Coms to resolve the dispute (% volumes managed during the reference year)	no.	1,182	1,434	2,103	2,552	2,175
	%	8%	12%	12%	11%	8%
User request for the Authority or the Co.Re.Coms to adopt an urgent measure (reference year)	no.	1,390	1,460	2,431	2,752	2,481
	%	11%	12%	14%	12%	9%
Total		14,804	14,662	21,514	28,339	32,263

Consumer Association Complaints and Joint mediation requests [40]		2023	2022	2021	2020	2019
Complaints from Consumer Associations (no.)		5,172	4,543	5,178	6,070	7,032
Joint mediation requests (no.)		2,169	2,459	3,125	3,667	4,204
Claims managed (no.)		2,149	2,606	3,115	3,671	4,011
Claims with a positive outcome	no.	2,059	2,442	2,928	3,465	3,482
Claims with a positive outcome	%	96%	94%	94%	94%	94%

Litigation with customers	2023	2022	2021	2020	2019
Pending as of 31/12	6,053	11,308	13,530	13,339	13,206
Favourable outcomes (%)	81%	76%	75%	72%	68%

In future, it will therefore be necessary to observe and evaluate any further implications of the Cartabia Reform, which has provided for the advance payment of the standard fee for the filing of the case as well as the advance submission of supporting evidence, to enable an understanding of possible future trends in matters of litigation.

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[40] The submission of the complaint through the association is a requirement for the submission of the joint mediation request.

Dialogue with consumer associations

In 2023, Wind Tre confirmed and consolidated its commitment to the support of initiatives aimed at fostering dialogue with consumer associations. In the context of the development of digital technologies – given their importance to the everyday lives of members of the public – the company renewed its protocol of cooperation with the main Italian consumer associations: Adiconsum, Adoc, Cittadinanzattiva, Federconsumatori, and U.Di.Con.

Intensive dialogue with these parties has enabled significant incidences of sharing and exchange which allowed important topics such as the new multi-service positioning of the company to be addressed. Discussion about the new offers for families and holidays allowed the company to showcase its insurance products and to share the new commercial formulas of the offers as well as aspects relating to customer management with the associations.

Furthermore, during the course of the year, discussions took place about commercial innovations relating to connectivity; dedicated meetings were held to discuss actions targeted at Wind Tre customers, with particular reference to activities connected with the modification of certain contractual conditions. These meetings also addressed topics relating to new legislation for the sector and its consumers, allowing participants to discuss their respective positions. Broader topics were also addressed, including the need for the structural reform of the telecommunications sector in order to boost the country's digital transformation.

Efforts to involve the associations and their members were supported by the 'Special Caring' channel, which is intended for the management of complex cases where special reassurance is needed. This measure aims to optimise the customer experience through discussion among the parties.

Understanding of digital training issues has been deepened through targeted dialogue aimed at the communication of Italy's needs with regard to the popularisation of key topics for the development of new technologies. Two projects were developed by the associations in this area, investigating the topics of 5G and digital culture with the non-conditional support of Wind Tre. In the first project, the associations engaged in an independent consultation aimed at finding out about the sentiments of their members with regard to 5G and detecting perceptions and prejudices associated with new technologies. The results of the work were presented at a national conference in Rome in February 2023, attended by leading figures from universities and research bodies who gave speeches to deepen the debate on 5G. The second project, also based on analyses of members, focused on the regions of southern Italy. The study analysed the dimensions of the digital divide through a consideration of sociocultural aspects. The results were summarised in a final report and presented by the associations at the 'Convegno 5G e Cultura Digitale – Focus Sud Italia' (5G and Digital Culture Conference – A Focus on Southern Italy), held in Naples in December 2023 and attended by important figures from academia, universities, and institutions.

Clarity and transparency in commercial communications

[GRI 417-3, GRI 2-4]

The Advertising Self-Regulation Institute sets the parameters for "honest, truthful and correct" commercial communication to protect fair competition between businesses and consumers through a Commercial Communication Self-Regulation Code, binding for those who adhere to it, i.e. everyone the main operators in

the sector (companies that invest in communication, agencies, consultants, broadcast media, concessionaires, etc.).

In 2023, Wind Tre had only one complaint of non-compliance with the Corporate Governance Code which ended with a ruling of deceptiveness (with consequent obligation to stop disseminating the censored message) in relation to an advert for the offer of a smartphone, limited to usability of the information present in the legal notes (considered insufficient for size and time spent on video).

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

Non-compliance disputes relating to marketing communications [GRI 417-3, GRI 2-4][41]	2023	2022	2021	2020	2019
Non-compliance disputes resulting in fines or penalties (no.)	0	0	0	0	0
Non-compliance disputes resulting in voluntary commitments (no.)	1	0	1	2	1

More humanity

We believe that digital technologies are a way of reducing distances and guaranteeing **greater inclusion** and access to the Internet regardless of gender, race, age, disability, 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

[GRI 3-3]

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[41] The table has been updated compared to the previous year, eliminating a line that represented a duplication of the same information reported in the data present in the "Non-compliance disputes resulting in voluntary commitments (n.)".

46%	60%	1 Gbit/s
The percentage of Italians who have basic digital skills (in comparison with an average of 54% at European level) *(ISTAT, 2023)*	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 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.

In its *Declaration on Digital Rights and Principles*, the European Union emphasises the importance of **technology, which needs to serve and benefit everyone who lives in the EU, enabling them to pursue their goals in complete safety and with full respect for their fundamental rights.** The EU member states must therefore commit to **pursuing a digital transformation which leaves nobody behind and which benefits everyone**[42].

Italy started off with a persisting digital divide depending on region. In fact, around 6 in 10 residents in the south of Italy have only limited access to ultra broadband technology, and 17.3% of residents live in areas where this standard is completely inaccessible[43]. There is also **skills divide**. According to ISTAT, 46% of Italians have basic digital skills, in comparison with an average of 54% at European level. This divide becomes increasingly pronounced as we age. Although 61.7% of people in the 20-24 age range have at least basic digital skills, this rate drops rapidly with age and is only 42.2% for people aged 55-59 and just 19.3% for people in the 65-74 age group.[44]

Reducing the digital divide to the point of completely eliminating it therefore means not only continuing to **commit to the universal spread of digital technologies** but also supporting the dissemination of digital culture in order to ensure that **progress made in terms of geographical coverage is not made ineffective as a result of insufficient computer literacy**.

Although the national ultra broadband strategy aims to increase connectivity throughout Italy to 1 Gbps by 2026, the need for **educational programmes and refreshers** relating to the use of the Internet and digital devices is increasingly urgent, along with improving the level of responsibility in the use of digital tools.

Our commitment

- Striving to bridge the digital device between geographical areas and to ensure more uniform Internet access
- Implementing the corporate purpose of eliminating distance of any kind between people
- Offering concrete support to the more vulnerable segments of the population
- Expanding and modernise digital infrastructures to establish a solid digital foundation for 4.0 technologies
- Engaging in constant dialogue with public administrations to facilitate access to new technologies

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[42] European Union, Declaration on Digital Rights and Principles, 2022
[43] ISTAT, 2022: 'I divari territoriali nel PNRR: dieci obiettivi per il mezzogiorno'
[44] ISTAT: 'Cittadini e competenze digitali', 2023

- Disseminating the skills required to face the digital transformation to more and more people – starting with those who risk being excluded – by highlighting opportunities and risks

ESG goals

Goal	Horizon	Ambition	Courses of action	The point we're at
Connected Villages	2025	Foster the growth of small Italian villages through connectivity, improving skills, and digital technologies	• Consultancy on **technological needs and infrastructure assessment** Development of **educational programmes** targeting the public administration, businesses, and members of the public • Development of **memoranda of understanding** for the range of programmes and projects offered to local administrations • Development of connectivity services for communities, such as Wi-Fi coverage in public areas • Dialogue and partnerships with industry associations • Participation in events and funding of **local initiatives intended to benefit communities**	• Adhesion of 92 municipalities to the Connected Villages project, for a total of about 340,000 citizens • Launch of digital transition initiatives to support Local Administrations • Assistance with the organisation of events focused on the digital divide and innovation • Scheduled training events in all of the municipalities which belong to the 'Connected Villages' project to promote digital literacy and the responsible use of technology • Participation in the national festival of 'I Borghi più belli d'Italia' (Italy's most beautiful villages) • In partnership with the Italian Association of Digital Nomads (AND), for the third report on digital nomadism in Italy and the definition of an attractive community model for workers

Connected Villages

The **Connected Villages** project, launched at the end of 2021, aims to help small villages to overcome the cultural obstacles which sometimes slow down the dissemination of new technologies, triggering a journey towards a new and more sustainable type of development. The project is focused on four main areas:

- **Training adults and children about new technologies**
- **Assessing telecommunication infrastructures**
- **Developing services dedicated to the community**
- **Providing advice on technological needs.**

In the education area, training courses for members of the public – starting with children and older people – and for the public administrations help participants to better understand the benefits of the new telecommunications solutions, opening up paths to the other three areas of the project.

2023 was primarily dedicated to realising the project content from an educational point of view.
By the end of the year, **92** municipalities had joined the scheme, with a total of around **340,000 residents** becoming involved in workshops providing training in the advanced use of mobile phones for adults thanks to

the introduction of the 'NeoConnessi Silver' scheme, and with regional schools participating in the original 'NeoConnessi' project.

In total, more than 200 hours of training were provided to adults in the 47 municipalities of the 'NeoConnessi Silver' scheme, while the 'NeoConnessi' project involved the participation of 74 primary schools.

In September, Wind Tre was also the main partner of the 15th edition of the national festival of 'I Borghi più belli d'Italia' (Italy's most beautiful villages). This annual event is organised by the association of the same name, to which more than 350 Italian villages belong. In 2023, the festival took place between the 8th and 10th of September in Lucignano, a commune at the heart of Valdichiana Aretina.

The sessions scheduled during the festival addressed a range of topics relating to development opportunities for Italian villages. The issues covered included sustainable tourism, the protection of production and of the cultural landscape of inland areas, and the role of governance at regional level for policies for the promotion of the entire supply chain.

On Sunday the 10th of September, Wind Tre hosted the session 'Borghi Connessi: eliminare le distance con il digitale' (Connected villages: eliminating distances with digital tools) at the Terrazza delle Logge di Lucignano. At this event, Wind Tre showcased the programme the company wishes to use to contribute to overcoming the digital divide.

In 2023, Wind Tre entered into a partnership with the Italian Digital Nomads Association (AIND), a non-profit organisation which aims to promote remote working and digital nomadism. Through this new partnership, Wind Tre aims to expand its 'Connected Villages' project by promoting – together with AIND – an attractive community model for workers and to help municipalities to overcome the geographic digital divide with the support of innovative technologies. At the end of the year, thanks to the synergy between Wind Tre and AIND, the third report on digital nomadism[45] in Italy was presented. This study was carried out with the aim of determining the extent to which digital nomads can specifically contribute to the reinvention of Italy and to its economic and social development.

Wi-Fi Calling

The Wi-Fi Calling feature **allows users to make and receive calls even if there is no mobile signal** through a Wi-Fi connection. This feature addresses a specific need: to be able to receive calls on a smartphone and to make calls – including emergency ones – even from within thick-walled buildings, remote homes, basements, shops, and restaurants, or in any other situation where mobile coverage might be obstructed. It provides a seamless experience without any dropped calls as the call switches from the cellular network to Wi-Fi and back.

In 2023, Wind Tre continued to increase the number of smartphones compatible with this feature as well as introducing the following innovations:

1) In September 2023, in confirmation of the company's commitment to ensuring closeness to Italian families and offering services which can satisfy all personal and work-related needs, Wind Tre extended the Wi-Fi Calling service – which was initially available only on smartphones compatible with WINDTRE Wi-Fi – to other Wi-Fi networks, including those of other operators. The experience offered is stable and seamless, without interruptions to calls.

2) As of December 2023, the feature has also been extended to include iPhone models, a step which has increased the wide range of devices compatible with the Wi-Fi Calling service.

Through this initiative, Wind Tre has again reaffirmed its closeness to customers, with a service based on increasingly innovative technologies which can **overcome the digital divide in terms of mobile coverage**. Wi-Fi Calling is available **free** to Wind Tre's consumer and business customers with compatible smartphone devices[46].

The Wi-Fi Calling feature **does not entail any costs beyond the applicable rate plan, can be used nationwide, and does not require the installation of an app** or the manual configuration of the user's mobile device.

During the course of the year, Wind Tre strengthened the adoption of the service through advertising campaigns in March, April, and September. The TV ad 'Wi-Fi Calling', featuring brand ambassador Rosario Fiorello, won a new prestigious award at the FED Awards 2023. The information campaign about the service received the prize in the 'Sport & Programme' category at the Forum Europeo Digitale event, which took place in the illustrious setting of the Real Collegio di Lucca.

Gender parity

131	30%	79th
The number of years needed to bridge the gender divide at global level	Companies with more than 30% of women among top management are much more likely to experience higher financial returns	In 2023, Italy came 79th out of 146 countries monitored by the Global Gender Gap Report
(World Economic Forum, 2023)	*(McKinsey, 2023)*	*(World Economic Forum, 2023)*

Gender parity is closely linked with social justice, and is one of the key objectives of the United Nation's 2030 Agenda. Progress is being made, but not fast enough – there is still a lot to do. Equality must become a global priority, and requires everyone's commitment to encouraging parity in all aspects of life.

Certain encouraging trends can be seen in Italy, including **more women at the top in business and politics** and an **upswing in the female employment rate**; however, **our country still comes** 79th out of 146 countries **monitored with regard to the participation of women in comparison with men in economics, politics, and the fields of health and education**[47].

With regard to companies, for example, at the end of 2023 the Research department of the Italian Chamber of Deputies took a snapshot of gender disparity at work in Italy. 55% of women aged between 20 and 64 are employed, compared with a European average of 69.3%, and the difference in the average annual wage in comparison with men is 7,922 euros[48].

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[46] For an updated list of compatible devices, see: https://www.windtre.it/wi-fi-calling-windtre/
[47] *World Economic Forum: Global Gender Gap Report 2023*
[48] Dossier published by the Research department of the Italian Chamber of Deputies on the 13th of December 2023

Underemployment, often in unstable positions, part-time work, work in sectors with low income levels or low-strategic sectors, and increasing inactivity for family reasons: all these factors combine to affect self-esteem, too, since 59% of women employed by large companies do not trust their ability to achieve a leadership position despite wishing to have a career[49].

Companies can play an important role in eliminating the employment gender gap, and the introduction of a strong and effective policy in this area brings **major benefits for the company itself**. According to McKinsey, companies with more than 30% of women among top management are much more likely to experience higher financial returns[50].

In addition, greater diversity in the leadership team apparently contributes to strengthening the company's engagement with the various *stakeholder* categories, which has a positive impact on ethics, community involvement, and the general image of the company[51].

Our commitment

- Ensuring gender parity with regard to access to opportunities for growth, career development, and remuneration
- Promoting and maintaining an open and inclusive culture
- Promote female leadership

Our ESG Goals

Goal	Horizon	Ambition	Courses of action	The point we're at
Gender parity	2025	Guarantee of 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	• **Empowerment pathways** to support a culture which is also oriented towards gender parity • Guarantee of **gender equality** with regard to promotion and all remuneration policies • **Listening sessions** dedicated to gathering information about needs and expectations • Promotion of practices and policies which **foster a culture of equality**	• Internal annual objectives in terms of role promotions and promotions to manager. • First Telco company in the world to obtain EQUAL-SALARY certification • A leader in diversity in 2023 according to the Europe's Diversity Leaders survey of Statista and the Financial Times • Partnership with the Gemelli University Hospital, Rome, and the ASSOLEI association for the opening of the first anti-violence centre, at the Gemelli Hospital • GENERATIONS 4 INCLUSION, a first initiative dedicated entirely to intergenerational teamwork on diversity and inclusion issues • Partnership with 'PARKS Liberi e Uguali' for webinars on romantic orientation and gender identity

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[49] Bain & Company, 2021, 'L'Italia non è (ancora) un paese per donne' (Italy isn't (yet) a country for women)

[50] *'Diversity matters even more: The case for holistic impact', McKinsey, 2023*

[51] *McKinsey, 2023, see above*

Focus on diversity & inclusion

[GRI 405-1, GRI 405-2]

During 2023, the company implemented its diversity, equity, and inclusion strategy with the aim of fostering an open, inclusive, and respectful working environment where people can express their uniqueness and identity freely.

The Diversity & Inclusion team is responsible for helping the company to achieve its goals in terms of gender parity 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 which is 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 key aspects this can entail such as gender, ethnicity, age, religion, disability, and romantic orientation
- ensuring the **implementation of the Diversity & Inclusion strategy and plans**, including focusing on the achievement of corporate organisational well-being – in collaboration with the competent corporate bodies – on the basis of associated initiatives and processes
- ensuring the promotion of projects, activities, and analyses aimed at **improving working conditions for people with a disability within the company** through the Disability Hub

In order to promote an open and inclusive culture, Wind Tre encourages discussion, cooperation, and teamwork between personnel from different generations. With this in mind, the GENERATIONS 4 INCLUSION project was launched in 2022, coming to an end in February 2023, when the winning teams received their awards.

GENERATIONS 4 INCLUSION was Wind Tre's first intergenerational initiative completely dedicated to issues of diversity and inclusion. These topics included gender parity, age and generations, parenting and care-giving, disability, LGBTQ+, and inclusive language and behaviour.

The project involved 72 people grouped into 12 diverse and inclusive teams whose members represented all ages, genders, skills, and departments. Each team worked on a specific D&I topic with the aim of developing specific projects and proposals consistent with the company's purpose, values, and goals. All of the projects were presented to and judged by an internal jury.

The winning projects related to the LGBTQ+ and inclusive language and behaviour areas, and these areas are addressed by the first two projects to be implemented, which were launched during 2023. Also during the course of 2023, Wind Tre furthered its journey of inclusion with regard to LGBTQ+ issues by participating in **Milan Pride** for the first time, in June. The aim of the initiative was to demonstrate support for the LGBTQ+ community, increase the awareness of employees about LGBTQ+ issues, and take part in the parade as a corporate group. In order to provide tangible support to the LGBTQ+ community, Wind Tre has entered into a partnership with the 'CIG Arcigay Milano' association, the organiser of Milan Pride, and supports the following two major social projects managed by Arcigay thanks to donations made by company personnel:

- The 'sportello psicologico', a counselling service run by professional psychotherapists and counsellors with expertise in LGBTQ+ matters, providing a welcoming and non-judgemental ear and a place of support to help people manage their feelings, targeted at the LGBTQ+ community and their family and friends

- A helpline offering – through various channels – a friendly ear, an opportunity to talk, and information relating to the LGBTQ+ community

CIG Arcigay Milano also offers a 'first-stop' legal advice service managed by lawyers from the Milan Bar Association with the aim of supporting victims of homotransphobia and discrimination. Wind Tre personnel have donated more than 2,600 euros to the Arcigay association in order to support its psychology helpline and support services by ordering 250 branded LGBTQ+ kits.

The project with Arcigay Milano has been promoted through internal and external communication activities to encourage donations by Wind Tre's personnel and to support awareness of the brand and the positioning of the company as an inclusive employer. Communication activities include the following:

- A dedicated intranet page and e-mail address to support donations in exchange for the 'WeProudly Kit', a kit of branded goods (e.g. a shirt, backpack, stickers)

- Media relations, LinkedIn communications and the corporate website

- Branded materials for display during the Pride parade

After taking part in Milan Pride, Wind Tre also launched 'We Proudly', a new intranet space dedicated to providing information, raising awareness, and increasing visibility of the LGBTQ+ community as well as discussion on associated topics. This is a safe place of reference for anyone wishing to deepen their understanding of the diverse world of gender identity and romantic orientation.

The project, proposed and managed by one of the winning teams of the GENERATIONS 4 INCLUSION competition, was launched in July 2023 and will be updated with new content and features by the LGBTQ+ ambassadors. The intranet space has four sections: Find Out More, Events, Contact Information, and Play Your Part. In the 'We Proudly' space, Wind Tre users can find the 2022 LGBTQ+ webinars, information on how to contact the ambassadors, useful information about LGBTQ+ associations, and some interesting FAQs.

Finally, in 2023, the company embarked on a strategy of increasing awareness and the involvement of its personnel in the issue of inclusive language. Internally, this has been branded as the '**Human Language**' project. In July 2023, on the basis of one of the winning projects in the GENERATIONS 4 INCLUSION competition, the company created its first intranet space dedicated to inclusive language. The space has been used to introduce the topic and to announce Wind Tre's 'Human Language Game'.

The 'Human Language Game' consists of four challenges and a range of competitions in which the teams compete to arrive at a definition of the Wind Tre Human Language Manifesto. This initiative will have a major impact on corporate culture, involving around 350 people in 48 teams. It will come to an end in spring 2024.

The following tables show the incidence of women by contractual level – which shows an improvement over time in women at supervisor level but a decline in 2023 in women at management level, due to the failure to achieve the objective included in the ESG Plan – as well as the ratio between male and female remuneration in the various locations and other indicators of gender diversity.

Percentage of women by contract level [GRI 405-1b]	2023	2022	2021	2020	2019
White collar	53%	52%	52%	51%	51%
Supervisors	29%	27%	27%	26%	26%
Management	27%	28%	28%	26%	23%
Total	50%	49%	49%	48%	48%

Gender diversity [GRI 405-1a][52]	2023	2022	2021	2020	2019
Women on the Board of Directors	14%	14%	17%	17%	17%
> 50 years	100%	100%	100%	100%	100%
Women on the Executive Committee	11%	11%	14%	14%	14%
> 50 years	100%	100%	100%	100%	100%
Women in senior leadership positions	27%	28%	28%	26%	23%
30-50 years	34%	30%	43%	50%	61%
> 50 years	66%	70%	57%	50%	39%
Women hired	43%	40%	43%	49%	48%
< 30 years old	56%	71%	65%	60%	66%
30-50 years	42%	29%	29%	30%	33%
> 50 years	2%	0%	6%	10%	2%

Ratio of basic salary to male/female pay [GRI 405-2]						
Level	Rome	Rho	Pozzuoli	Ivrea	Palermo	Company Total (including smaller locations)
3	1.05				1	1
4	0.98				0.92	1.02
5	0.99	1.02	1.01	1	1	1.01
6	0.96	0.99	0.97	0.96	1.01	0.98
7	0.93	0.96	0.93	0.99	0.87	0.95
Q	0.98	0.93	0.81	0.89	1.07	0.95

As for external initiatives are concerned, in March 2023, as mentioned above, Wind Tre opened the 'S.O.S. Lei' violence prevention centre in partnership with Gemelli University Hospital and the ASSOLEI association. The centre is located at Gemelli University Hospital, Rome.

This violence prevention centre provides dedicated, tangible help to women who are victims of gender-based violence and to their children. The ASSOLEI association – through specialist personnel (psychologists, social workers, and language mediators etc.) – conducts the actual activities and initiatives offered to women who use the centre's services. This initiative fits in perfectly with the company's purpose of existing in order to eliminate distance of any kind between people, since its goal is to be at the side of people suffering from gender-based violence and to help with their needs. This is a place where humanity, proximity, assistance, and inclusion are guiding lights.

The project was communicated by means of an information campaign including the following elements at touchpoints inside and outside the company in order to raise awareness and support the women who ask for help:

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[52] Other types of diversity not significant.

• On-site information material with WINDTRE's logo at the hospital site, including dedicated videos, posters, and flyers addressed to women who need help

• Media relations: releases and interviews

• Showcasing on the corporate website and on LinkedIn

• Dedicated internal campaign on the intranet and at the company's offices

In addition, for the occasion of the International Day for the Elimination of Violence Against Women 2023, Wind Tre – in collaboration with the IED OffiCine cinema training laboratory – produced and launched the short film 'DI NOTTE' (AT NIGHT) about gender-based violence and street harassment. The film was distributed by means of a social campaign on YouTube and LinkedIn.

Further content, on digital violence and online responsibility (issues such as cyberstalking, cyberbullying, and the non-consensual sharing of images and videos), will be distributed during the course of 2024, primarily targeting the younger generations (Italian secondary schools and educational institutions). Wind Tre also supports Valore D, the first association of companies dedicated to promoting gender balance and establishing inclusive corporate cultures, and is committed – partly thanks to its partnership with M&M Minima Moralia – to ensuring an equitable representation of men and women in its communications and in all events in which the company's personnel participate.

Inclusion of disabilities

[GRI 3-3]

Around 13 million	More than 3 million	35%
The number of people whose routine activities are restricted due to health issues *(ISTAT, 2022)*	The number of people in Italy who suffer from a serious disability *(Inail, 2023)*	The employment rate for people with disabilities in Italy as opposed to the European average of 50% *(Eures, 2022)*

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, **more than 3 million people** (5% of the population) suffer from considerable restrictions in carrying out normal everyday activities due to various health problems[53].

As life expectancy continues to increase, more and more Italians will be faced by restrictions of this kind. Consequently, our welfare structures and the world of work will have to face an increasing demand for services.

More and more companies are embracing a commitment to the inclusion of people with a disability in the knowledge that creating a workplace which is inclusive and welcoming for all workers is a path worth travelling. However, there's still a long way to go. In Europe, the employment rate for people with a disability (50%) is well below average, and the figure for Italy (35%) is even lower than the European rate[54]. Moreover, **40% of people with a disability do not feel adequately valued by their company**, and 46% do not consider the company they work for to be a place where they're able to reveal their full potential[55].

Inail is currently conducting research on safe and accessible work environments with the aim of identifying **measures and techniques for improving occupational safety by adapting the physical environment and 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.

One of the main difficulties lies in the fact that disabilities can vary considerably, and not all disabilities are immediately evident. If you take less severe disabilities into account in addition to serious ones, there are around 13 million people living with a disability in our country – and around one in three of them is at risk of poverty[56]. Disabilities often develop over the course of a person's lifetime, and frequently they are invisible disabilities and are not recognised[57].

In 2021, the telecommunications sector took an important step towards ensuring the inclusion of people with a disability. The Italian Communications Authority (AGCOM) adopted a new resolution on **preferential pricing for fixed and mobile networks**. The resolution came into force in 2023 and now benefits people with severely limited mobility as well as people with poor vision and hearing difficulties[58].

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.

Our commitment

- Listening to and promptly meeting the needs of people with a disability
- Offering people with disabilities a work environment that's tailored to their needs

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[53] Inail: News 03/06/2023

[54] EURES (EURopean Employment Services), 2022

[55] Dynamo Academy: People with disabilities, 40% do not feel valued as individuals by their companies, 2021

[56] (National watchdog on the health of the Italian regions, 2022)

[57] Fondazione ISTUD: Disabilities and Work, 2021

[58] AGCOM: Resolution 290/21/ CONS, 2021, and Resolution 36/23/CONS, 2023

- Making our digital channels accessible to everyone

Our ESG goals

Goal	Horizon	Ambition	Courses of action	The point we're at
Digital accessibility for people with disabilities	2025	To ensure that all the information and support tools provided by Wind Tre to its customers can be easily accessed by people with disabilities	• To make the digital channels of the company fully accessible to people with disabilities • To make the Wind Tre social channels compliant with WCAG 2.0 AA guidelines • **To expand our portfolio of offers** to include solutions dedicated to people with disabilities • **To provide accessible customer support services** to people with disabilities	• Further improvement in the accessibility index for the digital touchpoints and the Wind Tre, Very Mobile, and Wind Tre Business sites achieved • All Wind Tre social posts made accessible • Improvement in the accessibility of customer support channels achieved • Existence of dedicated support offers for people with disabilities

Digital accessibility

[GRI 203-1]

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 the courses of action for this goal, **specific actions were carried out on the digital touchpoints and main websites** managed by the company in 2023: 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**).

One of the measures implemented by Wind Tre for its Internet presence was to change the content management system of the Very and Wind Tre sites. In addition, 100% of Wind Tre's posts on social media are now published in an accessible manner in accordance with the various guidelines.

Thanks to these measures, the company has further improved its digital channels, making them increasingly accessible to users regardless of their level of proficiency, experience, or ability.

Wind Tre has also improved the digital colour palette guidelines within design system management to make colour palettes fully accessible to visually impaired users.

During the course of 2024, the company will focus its actions on the app touchpoints (WINDTRE and Very, iOs and Android) with the goal of increasing accessibility and implementing the activities identified by the accessibility assessment.

All new initiatives on digital channels will consider accessibility parameters from the outset, so that WCAG 2.0[59] compliance parameters are anticipated at both the requirements and testing stages.

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[59] Web Content Accessibility Guidelines

Dedicated services

In order to formalise Wind Tre's commitment with regard to the inclusion of people with a disability in 2020 and thanks to Wind Tre's disability manager, a working group has been set up with FISH ONLUS – the Italian Federation for Overcoming Disabilities. The aim of the working group is to explore and listen to the needs which arise from some of the most common disabilities and to adapt Wind Tre's portfolio of offers so that they are accessible to all. For example, with the support of experts, Wind Tre has formulated specific offers for people with impaired hearing or vision. The following four offers are reserved/made available by Wind Tre for deaf and blind customers and customers with impaired hearing or vision: the 'Start 5G' special offer, with 50 GB 5G, unlimited minutes, and 2,000 text messages at a reduced rate, along with a dedicated helpline via WhatsApp; the 'Full 5G' special offer; the 'Unlimited 5G' special offer; and the 'Special Unlimited 5G' special offer, to cover all customers' needs. All of the offers have a dedicated price point and special *human* assistance.

As of November 2023, Wind Tre also has an offer for people with a full or partial hearing or vision impairment or a major mobility restriction who are **under the age of 14**, ensuring top quality and convenience for such users.

All of the offers mentioned above are also available to customers with serious mobility issues.

In order to improve the quality of life and day-to-day safety of older people and people with a disability, Wind Tre also has a 'Full Care' offer. This offer includes unlimited voice minutes, 200 text messages, 500 MB of Internet and the **Comarch Life Wristband**, a smart band which monitors the user's health to improve their safety and allow them to lead a more independent everyday life. As well as monitoring the user's heart rate, the band has GPS tracking and allows the user to initiate an emergency call by simply touching the display. Wind Tre employees can purchase the 'Full Care' solution at a reduced price. The offer includes unlimited minutes, 500 MB, 200 text messages, one smart device, and a dedicated app. The wristband is then paired with the Comarch Care Mate app to allow it to monitor key vitals such as the user's heart rate and the number of steps taken, and is associated with two emergency numbers which can be called automatically if needed.

Internal initiatives

At the end of 2019, Wind Tre established the role of **disability manager**, and – at organisational level – began **focusing on projects aimed at improving the working conditions and use of technological tools of people with one or more disabilities**. 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.

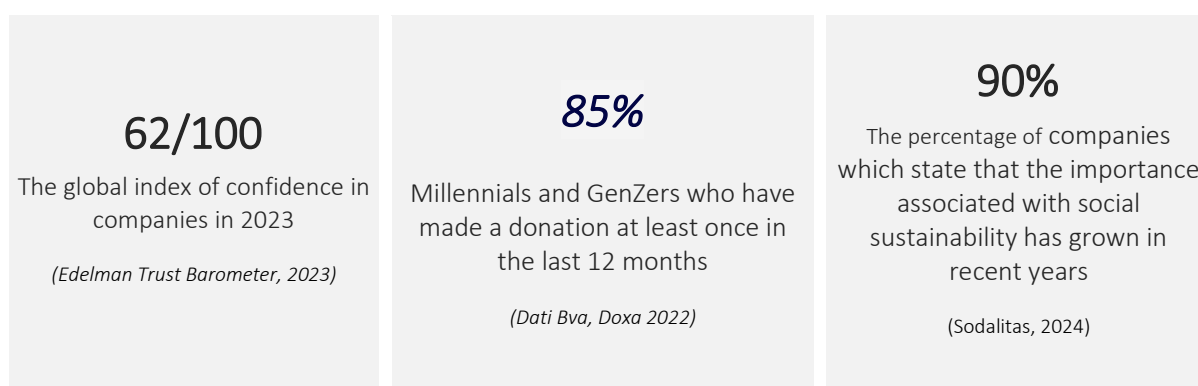All Wind Tre personnel can use the company's intranet to submit reports or support requests or to look for information and articles about topics associated with disabilities.

The issue of the full accessibility of corporate resources for people with a disability is also at the heart of one of the goals of the corporate ESG plan, which aims to improve digital accessibility for people with a disability.

In 2023, too, the company continued its commitment to supporting personnel with special social welfare needs for themselves or for family members through the '**Al Tuo Fianco**' (At Your Side) initiative, which provides access to an **expert on the available public and private services**.

This initiative allows employees facing difficult situations in assisting elderly or disabled family members to obtain support in finding and securing 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. 14 workers took advantage of this service in 2023.

Closer to the community

62/100	*85%*	**90%**
The global index of confidence in companies in 2023	Millennials and GenZers who have made a donation at least once in the last 12 months	The percentage of companies which state that the importance associated with social sustainability has grown in recent years
(Edelman Trust Barometer, 2023)	*(Dati Bva, Doxa 2022)*	*(Sodalitas, 2024)*

The survey conducted each year by Edelman confirms that **companies are the only entities which still retain the trust of the public**, scoring 62/100, one point higher than the previous year, whereas governments, NGOs, and the media all remain below the 60-point threshold. The recent 2nd report of the Osservatorio Sodalitas watchdog on corporate social sustainability[60] confirms that social issues are increasingly important, with companies being called upon to play a central role in promoting actions aimed at combating the many crises currently underway. The concept of **shared value** put forward by the economist Michael Porter is therefore still a relevant approach. No company is a standalone entity; instead, the success of every company depends on having an innovative approach to sustainability which sees social growth as a core goal rather than a secondary objective.

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 of the Osservatorio Socialis watchdog[61] on the social, economic, and environmental commitment of Italian companies, 96 % of Italian companies say they spend around 300 thousand euros a year on corporate social responsibility initiatives. In an ever-changing world, corporate social responsibility values are essential to success on the market.

Sharing value created by a company with the community also has benefits for the company itself. As well as increasing the engagement of employees with regard to their employer, since they feel more satisfied and more connected to the company, this also **improves the resilience and competitiveness of the company**. According to the study 'Coesione è competizione' (Cohesion is competition) of Fondazione Symbola[62],

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[60] Osservatorio Sodalitas sulla Sostenibilità Sociale d'Impresa (SSI), '2° Rapporto. Guidare la transizione sociale' (2nd Report. Steering the social transition) (2024)

[61] Osservatorio Socialis watchdog 2022

[62] Fondazione Symbola, 'Coesione è competizione', 2023

members of the public consider cohesion to be an added value offered by companies which deserves to be rewarded. Two out of three people would, in principle, be willing to pay more for the products and services of companies which pay attention to the well-being of their workers, customers, suppliers, and the community as a whole.

Our commitment

- Supporting the communities in which we operate, including 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 network infrastructures available to tertiary sector organisations for use for a range of fund-raising events for charitable causes, including the 'Solidale' fund-raising service and special cause-related marketing initiatives.

The 'Solidale' fund-raising service, offered in collaboration with other Italian telephony operators, allows customers to donate by sending a text message or by making a call from a landline. The funds raised are entirely transferred to the charity running the project supported. In 2023, Wind Tre collected and disbursed more than **two million euros** through making the fund-raising service available to the tertiary sector for more than **80 social and humanitarian initiatives**.

As far as Wind Tre's personnel are concerned, the company encourages active involvement in solidarity initiatives, both in the form of direct participation and through allowing them to decide which initiatives are supported. 2023's initiatives included the following:

- **Race For the Cure** – In May, as they have often done in the past, Wind Tre employees 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 donation matching the amount paid by employees through their registrations for the race.
- **Italian Red Cross and AVIS (Italian Association for Blood Donors)** - Like every year, Wind Tre organised blood donation days targeted at all of the company's personnel.
- **Charity Hub** – This is a dedicated part of the company's intranet showcasing some of the non-profit organisations and associations Wind Tre collaborates with and promotes through periodic internal information campaigns.

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 personnel to use the company's intranet **to propose and vote on charitable initiatives which then receive a donation from the company**.

Four projects received a donation in 2023:

- '**ScopriAMO la Fattoria – Natura, Inclusione & Amore**' (Let's discover the farm – nature, inclusion, and love), promoted by **Cooperativa Incontatto Arl** for the realisation of an inclusive teaching farm with activities guided by persons with a disability who live in shared housing in a social village

- '**Con tutto il coro. Più vicini anche con la musica**' (Singing from the heart: Proximity through music), promoted by the **Coro I Piccoli Cantori di Milano APS** association, establishing 11 scholarships for young singers whose family cannot afford the annual fees
- '**Scambiamoci un Gol**' (Let's share a goal), promoted by **SPES CONTRA SPEM**, an inclusive football tournament between young people living in Rome's children's homes
- '**ABITO LA MIA CASA**' ('LIVE IN MY HOME'), promoted by the **Fondazione Dopo di Noi** non-profit organisation, helping children with a disability to experiment with independence and test out their own ability for self-determination

Again in 2023, the company continued to unite team building exercises and regular team meetings with corporate volunteering. In May, in collaboration with Legambiente, a team from the Finance department spent the morning collecting and sorting rubbish along the banks of the Tiber in Rome. This initiative was greatly appreciated by passers-by, who thanked Wind Tre's personnel for their work. The event was publicised on the intranet to encourage the company's departments to rethink their team-building initiatives in the interest of solidarity and awareness.

Closer to the victims of natural disasters

2023 was marked by devastating natural disasters which put entire areas and their populations to the test. In this regard, too, Wind Tre has continued to prove that it always remains close to those in most need:
- In February, Wind Tre demonstrated its closeness to the people of **Turkey and Syria** by offering its mobile telephony customers free landline and mobile calls to these two **earthquake-hit countries**, enabling them to contact family members and friends during the grave emergency.
- In May, Wind Tre showed proximity to the **municipalities of Emilia-Romagna which were affected by severe flooding** by carrying out major work to restore telephone and Internet connections. Wind Tre's technicians were able to reach many of the places isolated by power outages and re-establish connections using emergency generators. The monitoring of infrastructure performance continued around the clock to enable fast action in the event of a sudden service outage. In addition, extra gigabytes to be used within a month were made available to Wind Tre's mobile customers living in the municipalities affected by the flooding, particularly in the provinces of Modena and Forlì.
- In November, Wind Tre helped people living in the areas hit by the **floods in Tuscany**, especially in the municipalities of the provinces of Florence, Livorno, Pisa, Pistoia, and Prato, providing private and professional customers with prepaid mobile lines with extra gigabytes. Wind Tre's customer service team was available to support the needs of people resident in the municipalities affected by the flooding.

Lifelong digital learning

[GRI 3-3]

90%	80%	7%
The percentage of Italian companies which use digital technologies	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 2030 (54% in 2021)	The percentage of university courses in Italy which relate to ICT 'in the narrow sense of the term'
(Assintel Report, 2023)	*(CE, 2022)*	*(Osservatorio sulle Competenze Digitali, 2023)*

The digital transformation is an ever-changing process, and its impact requires equally rapid and agile adaptation in all aspects of life – particularly in the workplace. **Digital skills are now essential**, and companies and institutions expect most of their employees to master them.

A national strategy has been launched in Italy to encourage digital skills. An operational plan adopted in December 2020 identifies 111 initiatives and establishes milestones and targets to be reached by 2025, including tripling the number of graduates in ICT subjects, doubling the percentage of the population with advanced digital skills, and – by 2025 – ensuring that 70% of the population have basic digital skills (rising to 80% by 2030 in line with European objectives). This strategy is fully in line with European guidelines and is strongly supported by the Italian Recovery and Resilience Plan (PNRR), which provides for measures dedicated to the development of digital skills and the training of human resources.

According to the report 'State of the Digital Decade'[63], **Italy made significant progress in the digital infrastructure area in 2023, but still faces a critical situation with regard to basic digital skills** despite increasing use of the Internet and digital services. This means that the country has not yet been able to benefit from the impact of the actions stipulated in the operational plan.

Furthermore, Italy's percentage of graduates in an ICT subject (1.5%) is still extremely low, significantly below the European average (4.2%). Although the importance of developing new skills and creating new professional profiles is recognised as a priority, the number of **Italian companies which offer ICT courses to their employees also remains low**, and is below the average for the EU.[64]

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 2023 with €1 billion. However, companies themselves can play an important role in stimulating the development of new skills.

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[63] European Union, Report on the State of the Digital Decade, 2023
[64] Nomisma and the Cirfood District watchdog, 2022

Telecommunications operators can make a significant contribution, for example, by making available experience and know-how gained in the field.

It is therefore becoming important to think in terms of **collaboration between public and private entities**, placing people at the heart of the matter and focusing on the development of digital skills by preparing young people for the challenges of the world of work and ensuring reskilling solutions which are suitable for the needs of companies. We must work together with a shared purpose, since improving digital skills and the development of human resources are the basis for an inclusive and truly effective transformation.

Our commitment

- Promote continuous digital learning among everyone, starting with Wind Tre employees and their families.
- Encouraging ongoing digital learning for all, starting with the youngest members of the community
- Preparing Wind Tre's personnel to face the challenges of the future
- Supporting training programmes for skill improvement and development
- Identifying and nurturing young talents

Our ESG goals

Goal	Horizon	Ambition	Courses of action	The point we're at
100% 'future ready' people	2025	To prepare the people of Wind Tre for the challenges of the future by supporting their employment and investing in lifelong learning opportunities	• **Develop the digital mindset and upgrade the skills** of personnel so that they can face the challenges of the future • **Retrain** personnel and upgrade their skills on the basis of market demands • Encourage a culture of **continuous learning and self-development** • Promote the **personalisation of training** in accordance with individual needs and aptitudes	• Over 340,000 hours of training provided in 2023 alone • New training programmes on the digital transformation and cybersecurity • Relaunch of internal faculties

Continuous skill development

[GRI 403-5, GRI 404-1, GRI 404-2, GRI 404-3]

The programmes dedicated to providing training in **technical, digital, regulatory, and language** skills, **technological development**, and **transversal skills** continued in 2023, and were available to all employees regardless of role or age. 100% of employees take part each year in performance development assessments. The digital platform **ConversatiON** enables both the evaluation of employee performance and the assignment of personal development plans. The progress of the assessment process is monitored constantly to ensure that the performance review is completed, with 98% completed in the last training cycle.

Skill development has always played a central role at Wind Tre, which became part of the shareholder structure of the **POLIMI Graduate School of Management** in September 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.

In terms of **specialist skills**, Wind Tre has identified certain key transformative training areas on topics such as business analysis, Six Sigma Green Belt, webinars on e-commerce & phygital experience, project management and many more.

In 2023, the **Technology Directorate** offered several training modules aimed at the **acquisition of new technological skills**, covering topics such as Mater 5G, Amazon, Huawei and Nokia microwave solutions, and Circe.

Also in 2023, a training programme on **project management** was launched, since this is considered a key skill for the present and future for various different professions within the company.

This project was targeted at the entire organisation, since its objective is not only to improve technical skills but also to strengthen team feeling and a sense of engagement.

The aim was to develop skills such as the planning, organisation, and management of resources, facilitating effective communication with team members and stakeholders and improving collaboration.

The project started with an assessment of around 130 people from all of the company's departments. This was used as an essential starting point for increasing awareness, identifying skills, and understanding the context in which the methodology is applied.

It continued with e-learning training courses on the basic elements of project management, conducted on the 'ConversatiON' platform and aimed at all participants, and then moved onto classroom-based training on specific topics.

In 2024, the company will continue to offer tutoring and certification exams.

With regard to **transversal skills**, the behaviours outlined in the citizenship model have been reinforced. This model is meant to guide the conduct of Wind Tre's employees as they carry out their daily activities within the context of people-oriented processes through the adoption of the new **Human Working** model. Discussions with employees found a desire to extend the flexible working practices which had been adopted during the pandemic, but in order to obtain a good work/life balance and safeguard the right to disconnect from work, the company had to plan dedicated training plans for all of Wind Tre's personnel. In particular, four training pathways, relating to the eight behaviours in the citizenship model, have been created. These are available at all times on the 'ConversatiON' platform and are accessible by all of the company's personnel.

2023 saw the implementation of the **Digital Transformation** programme, which aims to develop a digital mindset by providing personalised training plans about digital skills and innovation. The objective is to prepare Wind Tre's personnel for the **challenges of the digital transformation** and to help them to develop the skills required. The programme has three modules: Digital Challenges, Digital Enablers, and Digital Marketing Transformations.

A training project on cybersecurity issues (**Cyber Factor**) was also launched, targeted at all of the company's personnel and developed in partnership with POLIMI with the objective of promoting and disseminating a 'culture of cybersecurity' at all levels.

To support the analysis, reporting, and collaboration activities, training was provided on the main applications of the Microsoft Office package (Word, Excel, and PowerPoint).

In addition, **training in soft, transversal, and linguistic** skills is available at all times on the **digital ConversatiON platform**, which is open to all Wind Tre employees.

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

- **Beyond Programme**: This training course, which was launched in 2021 and is now in its third year, is aimed at developing critical lateral thinking and strategic vision through face-to-face meetings with appropriate experts.
- **Dialogues on Transformation**: This is an inspirational training course with the aim of reflection, through regular virtual meetings with testimonials, on four key words which characterise the transformation of our society and the company.

Moreover, as part of Wind Tre's **antitrust compliance programme**, specific regular training takes place in order to prevent anti-competitive behaviour and to ensure that all activities and projects are conducted in the best possible way.

In the field of **data protection**, too, various specific training courses have been conducted for all internal employees and for suppliers on the protection of personal data during processing in order to ensure that all projects are realised with full privacy by design and by default, and to guarantee responsibility on the part of Wind Tre.

To add to these initiatives, some **internal faculties** were launched in 2023, providing training courses by Wind Tre personnel for Wind Tre personnel. The many courses managed internally, both as face-to-face and online training, have proven that effective training can be achieved in a smart way if the teaching is entrusted to employees who are experts in the subject being taught as well as being aware of the organisational context. The Sustainability & Quality Certification team conducted a new project to promote corporate sustainability culture and the principles which inspire the ESG plan. This is called **On the Same Page**, and addresses sustainability with reference to the context in which the company operates and the various scenarios which it has to face – from economic aspects to the matter of the company's reputation – in order to give tangible form to the actions taken through the ESG plan.

Personnel with specific professional skills have passionately and generously put themselves forward to share their skills and knowledge and to offer a large number of people the opportunity to improve their own technical competence and other abilities. The teaching experience has given these tutors the chance to learn a lot about soft skills, enriching their abilities and acquiring a greater sense of awareness. This project is a concrete example of how **the concept of trust** works, as employees trust each other and cultivate distinctive relationships. The company also believes that this programme represents a model for value appreciation and inspiration which is capable of motivating more and more employees to put themselves forward with new sessions and training courses.

Training (hours) [GRI 403-5] [GRI 404-1][65]	2023	2022	2021	2020	2019
Total training	344,472	385,245	276,009	107,745	108,435
of which health and safety training	12,170	10,033	14,587	20,490	26,885
Average training per person	52.86	59.01	41.2	15.6	15.7

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[65] Employees involved in training: 6,500 in 2023, 6,518 in 2022, 6,693 in 2021, 6,821 in 2020 and 6,957 in 2019.

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

2023 was the **fourth year** of the training programme, and saw collaboration between Wind Tre and **Telethon** to give new employees a unique and engaging experience as they learn the corporate values: Trust, courage, responsibility, and inclusion.
On the 13th and 14th of June in Milan, the 18 participants in the **New Generation Programme** had the opportunity to enjoy two intense and productive days reflecting on and understanding how to make the purpose and values of Wind Tre concrete and tangible, with a focus on their creative strength. Daniele Eleodori and Samuela Mortara from Fondazione Telethon guided them in their journey.
Again this year, one of the most touching moments was the visit to the **NeMO Centre**, the centre for rare neuromuscular diseases at the Niguarda Hospital in Milan. Here, the new employees had the opportunity to meet patients and their families, listen to their stories, and be inspired by the courage with which these people face their daily lives.

Once their insertion into the company has been completed, Wind Tre provides its 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 future leaders. The Future Leaders programme also includes Mentoring, in order to support the participants on their journeys of self empowerment and personal growth.
2023 was also the third year of the JUMP programme, conducted in collaboration with Luiss Business School. This programme with continue throughout 2024.

The **OnStage** internship programme is also targeted at young students and recent graduates. In this programme, graduate students and recent graduates are supported by a tutor during a six-month internship when they work in range of company departments. A training course is also provided during this period, consisting of six meetings held on a monthly basis, focusing on the development of hard and soft skills in a hybrid manner. The programme begins with a **welcome day**, when the trainees and tutors get to know each other better and, above all, start to create a network and initiate their journey together. It then continues with

online sessions focusing on key corporate values, skills, and abilities needed for the job, including decision-making, trust, vision, and emotional intelligence. The end of the last training session brings an important milestone when the OnStage community is able to reflect on the changes and results obtained during the six-month internship with greater awareness of the skills acquired during this intensive programme of personal and professional growth. The programme concludes with **graduation day**, when the trainees and their tutor have a final opportunity to give feedback.

The programme was **revamped in digital mode for 2023, with the participation of 30 recent graduates**, 14 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, 2023 saw the launch of the **Cyber4Seniors** project, which provides an internal faculty dedicated to over-65 relatives of Wind Tre personnel. The aim of the programme is to help them to develop a digital mindset which will allow them to avoid the most common types of scam and online danger.
The well-trained tutors were other employees who offered up their skills on topics relating to digital identity, secure passwords, e-mail management, and spam.

Closer to Wind Tre people

87%	2 in 3	83%
The percentage of workers who want a workplace capable of sustaining their physical and mental well-being for the future	The number of Italian employees who believe that training and professional growth are extremely important factors	The percentage of companies in Italy which offer at least one well-being service to their employees
(Nomisma, 2023)	*(Randstad Employer Brand Research, 2022)*	*(Nomisma, 2022)*

Today, 'well-being' at the workplace **plays an increasingly important role within Italian companies**. Nine out of ten employees say that their job choice is partly based on the welfare services offered by the company.[66]

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. According to Nomisma, **the amount of attention which workers pay to their own health** (47%), nutrition (38%), and **time with loved ones** (25%) increased in 2022 in comparison with 2019. This, in turn, has prompted an increasing number of people to consider welfare services and tools **dedicated to healthcare and preventive care** (62%), **work/life balance** (59%), and **economic support** (56%) as crucial to meeting these new needs.

Mental and physical health and overall well-being have become increasingly important for workers, and companies must pick up on such needs and act accordingly. Moreover, **if stress, burnout, and anxiety are among the main factors negatively affecting corporate performance**[67]**, they must be countered with well-being initiatives** which allow employees to feel satisfied and at ease at their places of work.

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[66] Nomisma and the Cirfood District watchdog, 2022
[67] Ipsos and AON: 2021 Global Wellbeing Survey, 2021

Companies are indeed investing more and more in the well-being of employees, and are making this a priority. 83% of companies have a well-being strategy, up 28% from 2020, and 41% of companies say that their well-being strategy is fully integrated into the overall corporate strategy. It is, in fact, essential that such initiatives be **integrated into the corporate strategy and culture** in order to bring about a profound impact on the engagement of employees, talent acquisition, employee retention, and overall business results[68].

Corporate training also plays a primary role in corporate and personal success, since it provides useful tools for improving the company's work quality, competitiveness, and ability to face future challenges.

Our commitment

- Promoting work/life balance, diversity, and equal opportunity throughout the company
- Having an open dialogue with the company's personnel in order to constantly monitor their needs
- Communicating in a clear and transparent manner
- Establishing employee welfare plans to improve their well-being and quality of life
- Helping families with services that guarantee flexibility and a good work-life balance.

The Wind Tre team

[GRI 2-7, GRI 2-8, GRI 401-1, GRI 401-3 GRI 405-1]

As of the 31st of December 2023, Wind Tre had 6,500 employees, 50% of whom were women. **The quota of women among the managers was 27%**, roughly in line with previous years. Almost all employees have open-ended contracts and 82% have full-time contracts. Part-time contracts, which allow for a better work-life balance, concern over 18% of employees and are mainly requested by female employees.

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.

Listening to people is one of the main strategic courses of action to be taken in order to create an open and inclusive culture which is respectful of people's individual opinions and identities.

The survey takes place in two sessions each year: in June and November. Participation is always high, and the results of the 2023 sessions confirm that **empowerment, teamwork & collaboration, human working, and diversity & inclusion** are characteristics of excellence at Wind Tre. The process of listening to and engaging people through **further surveys and focus groups** has always been valued as a first step at the company, especially in moments of transformation and change. Over time, this has also been used to involve Wind Tre's personnel in the definition of the human working model (#ToBeSmart survey), agile working, and the current 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.

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[68] AON Global Well-Being Survey, 2022-2023

The following tables show detailed information relating to the workforce.

Changes in the workforce (incoming) [401-1]	2023				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	Central Italy	Northern Italy	South and Islands	Total
Women	21	39	4	64	20	31	1	52	40	12	0	52	8	9	3	20
< 30 years old	11	25	0	36	12	25	0	37	28	6	0	34	4	8	0	12
30-50 years	10	13	4	27	8	6	1	15	11	4	0	15	3	1	2	6
> 50 years	0	1	0	1	0	0	0	0	1	2	0	3	1	0	1	2
Men	37	47	2	86	24	47	8	79	45	19	6	70	7	12	2	21
< 30 years old	17	21	1	39	15	29	4	48	28	10	1	39	2	2	1	5
30-50 years	17	26	1	44	8	17	4	29	16	9	5	30	4	10	1	15
> 50 years	3	0	0	3	1	1	0	2	1	0	0	1	1	0	0	1
Overall total	58	86	6	150	44	78	9	131	85	31	6	122	15	21	5	41

Changes in the workforce (outgoing) [401-1]	2023				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	Central Italy	Northern Italy	South and Islands	Total
Women	13	42	5	60	34	66	18	118	23	44	14	81	14	38	18	70
< 30 years old	1	11	0	12	3	10	0	13	1	4		5		6		6
30-50 years	8	25	2	35	17	37	13	67	14	30	12	56	9	23	18	50
> 50 years	4	6	3	13	14	19	5	38	8	10	2	20	5	9		14
Men	31	52	3	86	60	108	20	188	44	61	22	127	34	56	17	107
< 30 years old	4	9	0	13	2	14	0	16	2	4		6	2	4	1	7
30-50 years	13	13	2	28	25	46	10	81	13	21	7	41	18	26	10	54
> 50 years	14	30	1	45	33	48	10	91	29	36	15	80	14	26	6	46
Overall total	44	94	8	146	94	174	38	306	67	105	36	208	48	94	35	177

Distribution of the workforce by contractual level [GRI 405-1b]	2023		2022		2021		2020		2019	
	Total (no.)	%	Total (no.)	%	Total (no.)	%	Total (no.)	%	Total (no.)	%
White collar	5,690	88%	5,740	88%	5,914	88%	6,008	88%	6,133	88%
Supervisors	648	10%	625	10%	627	9%	667	10%	681	10%
Management	162	2%	153	2%	152	2%	146	2%	143	2%
Total	6,500	100%	6,518	100%	6,693	100%	6,821	100%	6,957	100%

Employees by age group with full time contracts [GRI 405 – 1b]	2023	2022	2021	2020	2019	
< 30 years old	3%	3%	2%	1%	1%	
30-50 years	56%	66%	67%	67%	72%	
> 50 years	41%	32%	32%	33%	27%	

Parental Leave [401.3][69]	2023		2022		2021	
	Women	Men	Women	Men	Women	Men
GRI 401-3b Employees who took parental leave by gender.	220	17	231	19	231	17
GRI 401-3c Employees who returned to work after taking parental leave by gender	199	16	219	19	197	17
GRI 401-3d Employees still at work one year since the end of parental leave	n.a.	n.a.	n.a.	n.a.	215	17
GRI 401-3e (return to work)	90%	94%	95%	100%	85%	100%
GRI 401-3e (retention)	n.a.	n.a.	n.a.	n.a.	102%	74%

Distribution of employees by type of contract, by gender (no.) [GRI °2-7]	2023			2022			2021			2020			2019		
	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Open-ended	3,278	3,220	6,498	3,295	3,219	6,514	3,406	3,287	6,693	3,516	3,301	6,817	3,601	3,350	6,951
Fixed-term	0	2	2	2	2	4	0	0	0	2	2	4	3	3	6
Total	3,278	3,222	6,500	3,297	3,221	6,518	3,406	3,287	6,693	3,518	3,303	6,821	3,604	3,353	6,957

[69] For the data in the table, all absence codes relating to maternity leave (early, mandatory, 6 month optional, and optional for reasons of disability) were taken into account and the criteria required by GRI 401-3 were applied. Employees who took parental leave in the year XXXX whose leave came to an end before the end of that year (31/12/XXXX) 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 contract> length, by geographical area (no.) [GRI 2-7][70]	2023				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	Central Italy	Northern Italy	South and Islands	Total
Open-ended contracts	2,172	2,347	1,979	6,498	2,168	2,366	1,980	6,514	2,228	2,458	2,007	6,693	2,299	2,512	2,006	6,817
Fixed term contracts	0	2	0	2	3	1	0	4	0	0	0	0	0	1	3	4
Overall total	2,172	2,349	1,979	6,500	2,171	2,367	1,980	6,518	2,228	2,458	2,007	6,693	2,299	2,513	2,009	6,821

Distribution of employees by work hours (no.) [GRI 2-7]	2023			2022			2021			2020			2019		
	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Full-time	3,127	2,177	5,304	3,130	2,116	5,246	3,202	2,122	5,324	3,316	2,107	5,423	3,381	2,109	5,490
Part-time	151	1,045	1,196	167	1,105	1,272	204	1,165	1,369	202	1,196	1,398	223	1,244	1,467
Total	3,278	3,222	6,500	3,297	3,221	6,518	3,406	3,287	6,693	3,518	3,303	6,821	3,604	3,353	6,957

Full-time employees and distribution by gender and geographical region [GRI 2-7].	2023				2022				2021			
	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	791	758	628	2,177	770	741	605	2,116	772	762	588	2,122
Men	1,177	1,248	702	3,127	1,176	1,257	697	3,130	1,203	1,306	693	3,202
Overall total	1,968	2,006	1,330	5,304	1,946	1,998	1,302	5,246	1,975	2,068	1,281	5,324

Part-time employees and distribution by gender and geographical region [GRI 2-7].	2023				2022				2021			
	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	179	295	571	1,045	197	315	593	1,105	215	326	624	1,165
Men	25	48	78	151	28	54	85	167	38	64	102	204
Overall total	204	343	649	1,196	225	369	678	1,272	253	390	726	1,369

[70] The data shown correspond to the total number of employees at the end of the reporting period; they do not include the number of employees with non-guaranteed hours since the company does not have workers on such contracts. The percentage of workers on fixed-term contracts is not representative of a hiring practice, and the choice of part-time hours is linked to personal and business needs. The number of employees is declining in keeping with the multi-year transformation plan concluded in 2022 aimed at optimising the operating model.

[GRI 2 – 8] Workers who are not employees[71]	2023	2022	2021
Agency workers	108	108	93

[GRI 405-1 biii] Diversity and equal opportunity[72]	2023	2022	2021
Vulnerable categories	3.8%	3.7%	3.5%

Recognition by Top Employer Italia for the sixth consecutive year

Receiving recognition for the sixth year running by Top Employer Italia attests to Wind Tre's ongoing commitment to caring for its personnel, appreciating them, ensuring their full development, and guaranteeing a good work/life balance through a human working model which focuses on flexibility, responsibility, trust, and nurturing relationships. In line with the importance it places on inclusion, Wind Tre is committed to being a place where everyone can express their unique identity every single day, feel that their ideas and potential are appreciated, and enjoy the chance to participate and a sense of belonging. Thanks to the introduction of concrete policies relating to equity, diversity, and inclusion, the company actively promotes an open working environment on the basis of listening, sharing, and discussion. Over the years, this has caused the company to excel in the 'Diversity, Equity & Inclusion' category, with Wind Tre obtaining a score of 99.7%, 20.5 percentage points higher than the average of the 148 certified Italian companies. The company's overall score of 89.86% is still growing in comparison with its performance in previous years.

Over the years, the Top Employers Institute has recognised Wind Tre's significant and ongoing commitment, identifying some of the company's best practices as sources of inspiration for Top Employer Italia and Top Employer Global.

- Wind Tre's smart human working model was included in the Top Employer Italia eBook 2021 for its extremely innovative, inclusive, responsible, and sustainable character, and was made permanent by the company in 2022.
- The 'D Factor' digital mindset development programme was published in the Top Employer Global Best Practice Report 2021. Open to all of the company's personnel and carried out in partnership with MIP Polytechnic University of Milan, the programme aims to develop the digital and innovation skills which are fundamental for the future.
- The leadership model was included in the HR Best Practice Report Italy 2020 for the creation and dissemination of a model of leadership skills and behaviours as a unifying element of corporate culture and a key step in the process of integrating managerial styles

Wind Tre has always used LinkedIn, the largest professional social network in the world, for the daily communication of its culture and values. LinkedIn has recognised the company's stature and ability to bring about a significant capacity for audience involvement and engagement through is company page.

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[71] Workers who are not employees 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.

[72] Protected categories, Art. 1 and Art. 18

#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]

Within the context of its **welfare programmes**, Wind Tre continues to conduct numerous initiatives aimed at helping parents manage their children.

The need to be increasingly inclusive in **supporting parenthood** through specific actions motivated the company to design a new support model which provides for the partial reimbursement of school fees incurred by employees to send their children to any nursery or kindergarten nationwide. This means that regardless of their location, any employee can join a single national waiting list with a limited number of places (120, of which 29 are reserved, until the end of the academic cycle, for children already attending schools at the Rome, Pozzuoli, and Palermo locations which were already previously active), valid for both nurseries and kindergartens. The waiting list is accessible via a dedicated intranet app and is regulated by rules which set out the eligibility requirements. **Successful parents will receive a financial contribution as partial reimbursement of expenses incurred through their children's attendance at a private or public school of their choice**. The amount received ranges from 50 to 200 euros per month for a period of ten months and depends on the employment categorisation of the parent and the attendance time category of the children (short, medium, or long). **123** children were included in the list for 2023.

These solutions are accompanied by initiatives aimed at helping employees during the summer, when schools are closed. In 2023, employees again had the opportunity to apply for the reimbursement of a part – depending on their employment categorisation – of the fees incurred for one week at a summer camp for their child (aged between 6 and 12, with a maximum of three children per employee). A total of **537 employees' children** have benefited from this scheme.

Other educational support initiatives include the following:

- The **Buono Scuola** loan scheme, which advances a loan of 300 euros for a single child and 600 euros for two or more children for the purchase of school books. The amount is repaid in 6 instalments taken directly from the employee's pay cheque, with no interest charged. The loan was used by **183** employees in 2023.
- The **#schoolreward** initiative, a grant awarded to children who achieve exceptional results at middle school and secondary school. The initiative was revamped in 2023, and the prize – now reserved for the top 40 pupils in each grade – was raised to 400 euros net, disbursed in full in the October pay cheque. In 2023, **356** pupils benefited from the scheme. The award ceremonies, previously held between October and November at the relevant company locations with the direct participation of pupils and employees, were replaced by a motivational and inspirational event which was dedicated entirely to the major issues relating to our schools and was open to all.

- As further support for education, three new agreements were made in 2023: with the **Multiversity Group**, to allow a 50% discount on the annual fees for the online universities **Pegaso, Unimercatorum, and UniMarconi**, with **Esselunga**, to allow the purchase of books and school materials at a reduced cost, and with **GoStudent**, for online lessons at discounted prices.

In 2023, the company also continued its commitment to **supporting those with personal or family-related social welfare needs** through the 'Al Tuo Fianco' (At Your Side) initiative; further information can be found in the chapter 'Inclusion of people with a disability'.

In addition, the psychological counselling service '**Welfare Comete**' (Welfare Like You) gives employees the opportunity to request **professional psychological support** in order to overcome situations in which they feel anxious and vulnerable. The service is available to employees and their family members, with support provided by professional psychologists and educational specialists with years of experience in public and private services for the management of critical situations. The first visit is covered by the company.

Finally, the '**Wind Tre per Noi**' (Wind Tre for Us) platform gives Wind Tre employees access to a series of benefits which they can use on a daily basis such as consultancy services, online pop-up shops, and special deals throughout the country.

Wind Tre provides numerous services dedicated to well-being to facilitate a good work/life balance. One of these is a partnership with DooMore, through which Wind Tre again offered initiatives developed to **combine the maintenance of physical health with the pleasure of spending time together** in 2023. The initiatives include Mind & Body (a yoga-inspired activity to combat stress, work on psychophysical balance, and encourage the release of endorphins) and Core & Power (a Pilates-inspired activity which aims to help practitioners to gain full control of their body and improve their tone, stability, and strength). Both are offered as live webinars and as face-to-face activities at the Rome and Rho locations. In addition, in partnership with Gympass, Wind Tre has given employees an incentive to look after their physical health through offering a deal on monthly subscriptions at more than 2,100 centres throughout Italy. The Rome and Milan locations also have changing rooms and showers to make it easier for employees to get active.

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 work and private 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 salespeople are assigned company cars for personal and work use.

The approval gained by the **welfare plans** of previous years again prompted the company in 2023 to allow employees to transform the performance bonus[73] into corporate welfare vouchers which can be used at the main consumer goods chains or for the reimbursement of school/university fees or other family education expenses, transport expenses, or costs relating to caring for elderly relatives using the welfare platform which is made available to all employees.

In 2023, in order to communicate the overall value of its remuneration package in a clear and detailed way, including not only tangible monetary aspects but also non-monetary elements such as benefits and services, the company launched the **All4me** pilot project, associated with the Wind Tre Total Reward Statement.

Occupational health and safety

[GRI 403-5, GRI 403-9, GRI 403-10]

Ensuring occupational health and safety[74] is a priority for Wind Tre, which has **set up a dedicated internal management system** which complies with the most widely recognised international standards. With this system, the company aims to go beyond its legal obligations through the implementation of even more worthy practices and the constant improvement of its own results. With this in mind, Wind Tre's management constantly monitors the company's performance through all relevant indicators so that any necessary corrective actions can be made.

Alongside hybrid training through webinars, face-to-face training was resumed in 2023 for all aspects which require practical tests (e.g. first aid, fire prevention etc.). Overall, **1,694** employees were effectively trained in occupational health and safety in 2023, for a total of **12,170** hours of training.

As in previous years, there were no fatal accidents during 2023 among Wind Tre employees or employees working for other companies on Wind Tre's premises.
Again, like in previous years, in 2023 there were no workplace accidents with serious consequences for Wind Tre employees or employees working for other companies on Wind Tre's premises.
Furthermore, no complaints were made about occupational illnesses in 2023 (or in previous years).
16 accidents were recorded in 2023, 9 while commuting and 7 during work. The accidents were mainly random or due to distraction; none of the accidents were caused by incompetence or by factors for which the company is responsible.

The risk factors present at the workplace as a result of carrying out work activities are classified as follows:

- Risks to the safety of workers (relating to accidents)
- Risks to the health of workers (relating to workplace health and hygiene)
- Transversal risks (relating to health and safety)

The process of identifying hazards, assessing risks, and determining the necessary control measures is a continuous process which takes the following into account:

- Routine and non-routine activities
- The activities of everyone who enters the workplace

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[73] The company establishes the indicators for the performance bonus and the conditions for disbursement to employees each year in agreement with trade union representatives (OSS).
[74] The occupational health and safety of employees certification applies only to Wind Tre S.p.A.

- All possible and foreseeable human factors
- Risks which might originate outside the workplace during the course of activity under the control of the company
- Workplace infrastructure
- The layout of the company, production processes, and organisational methods
- Any changes to the organisational structure, processes, and materials used
- Applicable legal obligations
- Machinery, materials, and hazardous substances present during the performance of work activities or during the production cycle which could affect the health and safety of workers or of the external environment along with the associated upgrade and replacement procedures, whether for maintenance reasons or due to technical evolution or risk assessment changes

The **accident frequency rate** is reported in the table below; the calculation of the frequency index is carried out on the basis of 1,000,000 hours worked:

Accident frequency rate	2023	2022	2021	2020	2019
Employees (during work)	0.7	0.8	0.6	1.4	2.7
Employees (during travel)	0.9	0.2	0.3	1.0	4.7

More Green

Wind Tre has always been committed to making its operations more environmentally sustainable. These efforts can no longer be put on hold, 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

[GRI 3-3]

44%	+20.5%	53.6 million
The net production percentage of renewable energy in Italy in 2023	The estimated global increase in greenhouse gas emissions from the ICT sector by 2025	The tonnes of waste generated worldwide from electronic devices in 2022, of which only 17% was correctly collected and recycled
(Sole24Ore, 2024)	*(Capgemini, 2021)*	*(Global E-Waste Monitor, 2023)*

According to the latest estimates of the International Panel on Climate Change, **current state policies are still not sufficient to curb global warming**. In 2023, the global temperature exceeded 2°C above pre-industrial levels for the first time – well above the +1.5°C limit set by the Paris Agreement[75].

During the 28th Conference of the Parties to the UN Framework Convention on Climate Change (COP28), the first global stocktake of the world's efforts to address climate change under the Paris Agreement took place, measuring progress towards the achievement of the climate objectives set. This stocktake showed that the peak of global greenhouse gas emissions needs to be reached no later than 2025 and that these emissions must be **reduced by 43% by 2030 and by 60% by 2035**, in comparison with 2019 levels, in order to limit global warming to +1.5°C.[76]

With regard to the digital sector, its environmental impact is growing quickly: The CO_2 emissions of the industry will rise by 775% by 2040, increasing from 1.6% in 2017 to 14%[77]. The causes include the **impact of technologies such as AI**, with the associated significant increases in energy consumption, and **effects of the disposal of technological devices**. Global electronic waste will reach 74 million tonnes by 2030, almost twice as high as in 2014[78], fuelled by **higher consumption rates** and **shorter life cycles**.

In order to reach **net zero by 2050**[79], the ICT sector must reduce its global greenhouse gas emissions by 45% by 2030, with an acceleration which is becoming crucial to achieving the environmental targets set by various climate change conventions. The commitment of digital technology to steering change in order to meet ESG objectives is also becoming crucial.

The twin transition – the symbiosis of the digital transition and the environmental transition – is a central process in European strategies for achieving climate neutrality by 2050. In order to contribute to combating global warming and achieving a low-carbon economy which will not cause irreversible harm to the balance of the planet, **every single company must commit to reducing the impact of its business activities, structures, and services offered** in terms of CO_2 emissions. What is required is a **systemic approach** and the contribution of every single person to urgent action, since the choices made in this decade will be essential not only for achieving the 2050 targets but action – above all – for **ensuring a sustainable, liveable future for us all**.

CO_2 emissions are the most significant of all climate-altering emissions. The best way to measure the CO_2 emissions attributable to an organisation is to break them down them into three segments (Scopes):

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[75] 28th Conference of the Parties to the UN Framework Convention on Climate Change (COP28)
[76] COP28 2023 - Council of the European Union
[77] 'Breaking through ingrained beliefs: revisiting the impact of the digital economy on carbon emissions' – Wuhan University, 2023
[78] Global e-Waste Monitor
[79] SBTi criteria

- **Scope 1**: direct emissions from the organisat'on'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, 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.

Our commitment

- Constantly monitoring and improving the impact of our activities on the environment
- Modernising our nationwide network, to ensure continuous improvement in terms of energy efficiency
- Making an active commitment to reducing the CO_2 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

Our ESG goals

Goal	Horizon	Ambition	Courses of action	The point we're at
100% carbon neutral	2030	To eliminate CO_2 emissions (scope 1 and 2) by 2030	• A gradual increase in the **purchase of green energy** • Continuous modernisation of the radio access network to ensure **maximum energy efficiency** • Upgrade of the company car fleet o include low emission vehicles • **Offsetting** of residual CO_2 emissions	• Reduction of our CO_2 emissions by 35% in comparison with 2020 and by 46% in comparison with 2017 at the end of 2023[80] • Collaboration on the recovery of the WWF oases closest to the company's headquarters • A company car fleet increasingly sustainable (394 hybrid or electric cars) • Installation of 31 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]

[80] Part of this reduction in emissions is due to the exit from the perimeter of the sale of Zefiro Net. With the same perimeter as 2022 (including Zefiro Net and maintaining the same emission factor), the reduction in emissions would have been equal to -29%.

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 (Scope 1 and 2).

Due to the widespread nature of the network, it is **mainly supplied with energy purchased from the national grid** and, to a lesser extent, by a few company photovoltaic plants. At present, there are still some residual diesel-powered generators to provide power in the case of outages or for areas not served by the grid. 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 action taken in previous years, in 2021 Wind Tre approved and launched **a plan to eliminate its carbon dioxide emissions (Scope 1 and Scope 2) by 2030** through the appointment of a dedicated working group and the allocation of a specific budget. This plan maintains Wind Tre's commitment to the energy efficiency of equipment and infrastructures, the progressive purchase of renewable energy, and – finally – offsetting emissions which cannot be eliminated. By the end of 2023, the plan had brought about a **35% reduction in climate-changing emissions in comparison with 2020** (the plan's base year)[81]. The total reduction in emissions (Scope 1 and Scope 2) since 2017, Wind Tre's first year of business, **amounts to around 46%.**

Wind Tre activities and structures which 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)[82]	2023	2022[83]	2021	2020	2019	GRI
Consumption of fuel from non-renewable sources	105,728	104,187	93,335	95,047	137,158	GRI 302-1a
Consumption of fuel from renewable sources	1,260	1,243	1,260	1,260	1,328	GRI 302-1b
Electricity consumed	2,434,435	3,106,735	2,981,856	2,864,670	2,927,882	GRI 302-1c i
Of which from renewable sources	987,660	919,243	436,860	1,260	1,328	
Total	2,541,423	3,212,165	3,076,451	2,960,977	3,066,366	GRI 302-1e

Greenhouse gas emissions (Tonnes of CO_2 eq.)	2023[84]	2022	2021	2020	2019	GRI
Direct (Scope 1)*	9,190.1	8,118.0	8,609.1	10,361.1	9,408.9	GRI 305-1 a-b
Of which from air-conditioning gas refills	2,484.85	1,327.92	2,187.4	3,867.0		
Indirect market-based (Scope 2) *	141,140.9	163,557.1	195,430.4	219,863.4	224,714.9	GRI 305-2b
Total Scope 1 and 2	150,330.9	171,675.1	201,852.6	226,357.6	234,123.8	

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[81] Ibidem

[82] Other types of consumption are not applicable (GRI 302-1cii, ciii, civ, and d).

[83] Data for 2022 on the consumption of fuel from renewable sources updated following a recalculation

[84] Part of this reduction in emissions is due to the exit from the perimeter of the sale of Zefiro Net. With the same perimeter as 2022 (including Zefiro Net and maintaining the same emission factor), the reduction in emissions would have been equal to -29%.

Carbonic intensity (tonnes of CO_2 eq./TB)	0.012	0.016	0.021	0.029	GRI 305-4

: Data on biogenic emissions (Scope 1) [GRI 305-1c] are not applicable. Market-based indirect emissions are calculated on overall energy consumption net of consumption covered by Guarantees of Origin with reference to the emission factors related to the national energy mix, as data relating to the contracts of individual users are not available. Location-based indirect emissions for 2023 are equal to 237,260.1 tons CO_2 eq. [GRI 305.2a].

**: Data related to emissions associated with air-conditioning gas refills are only available from 2020; for comparability with previous years, these have been highlighted separately

With regard to the collection and analysis of the data on **Scope 3** emissions [GRI 305-3], so all of the **indirect emissions arising from resources which are not directly controlled or owned by the company but which take place within the company's value chain**, these data are available for the years shown in the table.

The approach taken to consolidate the information on Scope 3 emissions takes location-based operational control into account with a specific methodology for each reference category[85].

Greenhouse gas emissions (tonnes of CO_2 eq.)[86]	2023	2022	2021
Scope 3*	532,684	550,784	693,042

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

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'), Wind Tre S.p.A. maintained **two specific certifications** in its integrated management system in 2022.

In fact, Wind Tre S.p.A. has set up an **energy management system** in line with the international standard **ISO 50001** in order to ensure that it uses energy resources in an increasingly efficient way. Special attention is paid to the efficient use of energy consumed in connection with telecommunications equipment and the operation of the company's locations through interventions relating to technology and management. In addition, Wind Tre S.p.A. has had its **carbon footprint**, an indicator which enables the measurement of the quantity of greenhouse gas emitted directly and indirectly, certified by an independent third party in accordance with the international standard **ISO 14064**. The aim is to identify emission sources and understand their intensity in order to be able to develop strategies to reduce the company's impact.

Energy efficiency projects

[GRI 302-1]

Following the creation of the unified Wind Tre company, the organization set itself the goal of **modernising the entire national network** in order to make it increasingly energy efficient and ready to embrace the technologies and services of the latest generation.

The **mobile radio network equipment** has been replaced with the latest generation of energy-efficient equipment, **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 which 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

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[85] For more information, see the paragraph entitled 'Calculation criteria'

[86] The data included in the 2022 report was updated following the independent external audit on the scope 3 emissions of all the companies of the CKHH group, which included some perimeter revisions.

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 within the telecommunications network, various projects to optimise consumption associated with the development of 5G technology and projects relating to auxiliary systems such as air conditioning systems were launched in 2023.

For example, the company has developed an automated tool which dynamically determines where to take action to redirect traffic so that specific equipment can be placed in smart sleeping mode while other equipment continues to provide a service, thus reducing the use of infrastructure to achieve an energy saving.

In parallel, a programme for replacing power stations with systems which are technologically more advanced and offer improved performance was launched in November 2023.

With regard to auxiliary consumption, a programme to reduce the refrigeration load of network sites has been launched thanks to *in situ* checks and a careful analysis of the required operating temperatures.

Working 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_2 emissions.

In 2021, to celebrate the achievement of the emission reduction goals agreed as part of the partnership, **Progetto Oasi** (the 'Oasis' project) was born, with the aim of supporting the conservation of protected areas; Wind Tre symbolically gifted 2 m^2 of land situated in the three WFF oases closest to the company' main sites – the oases of Vanzago, Macchiagrande, and Astroni, which are close to Wind Tre's Rho, Rome, and Pozzuoli locations respectively – to each of its employees.

During the course of 2022, the 'Oasis' project was enriched with **various engagement activities** for employees and their children and grandchildren, leading to the production of an **illustrated book**, in collaboration with the WWF, to support the protection of nature and biodiversity.

The book, entitled '*C'è un bruco nella Foresta*' (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 posed by the children and grandchildren of the Wind Tre personnel who participated in the initiatives associated with the project. It was created with the aim of raising young children's awareness of the need to respect the environment and protect biodiversity. The book was presented at an event organised by the company at Palazzo Ferrajoli, Rome, during the Christmas holidays. The event was attended by various stakeholders from public institutions, the press, and the world of academia, all of whom were welcomed by Wind Tre's co-CEOs, Gianluca Corti and Benoit Hanssen.

In 2023, Wind Tre again decided to dedicate a special Christmas gift to all of its personnel, demonstrating its wish to make concrete gestures to influence its own future and that of the whole planet. Thus, the company decided to support the recovery of a further 70,000 m^2 area of the WWF's Macchiagrande oasis, located within

the national nature reserve on the coast of Rome. The Macchiagrande oasis is one of the most significant of Italy's protected sites, being characterised by a large area of Mediterranean backdunal scrubland and woodland. Macchiagrande, along with approximately 100 more WWF oases throughout our peninsula, is an example of how natural spaces which are protected and saved from decline create benefits for biodiversity, the region, and its people.

This project is in addition to those of previous years relating to urban forests, which were conducted thanks to collaboration with the Arbolia benefit company. This collaboration resulted in the **construction of an urban forest of more than 1,000 trees in the city of Taranto** by the end of 2021 and the creation of another urban forest of **more than 1,800 trees in Treviso** in 2022.

Finally, each year Wind Tre takes part in **Earth Hour, the world's largest mobilisation to combat climate change, coordinated by the WWF**, to raise public awareness about issues relating to the climate and energy. The event is dedicated to the promotion of 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 which also involves its own partners and points of sale.

Environmental awareness begins at the office

Wind Tre also promotes various initiatives for **improving the sustainability of the working environment** and reducing waste. These include the following:

- Installing automatic on/off systems for lights inside the technical rooms and offices
- Replacing neon lights with LED lighting at all of the company's locations, including smaller sites
- Sharing offices using smart working methods in order to alternate between in-person presence at the office and working from home
- The closure of one wing of the Rome premises across all office floors with a view to increasing energy savings
- Using AMA's ecological rating to monitor the Rome headquarters and installing ecoboxes at all of the company's locations
- 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 work started in 2021 to improve the efficiency of toilet facilities and to recover excess water from evaporative air cooling towers (for use for irrigation), the consumption of water at the company's offices has decreased by 33%, from 26,208 cubic metres in 2021 to 17,598 cubic metres in 2023.

To facilitate sustainable mobility, Wind Tre has 80 shared cars (car pooling), of which 25 are fully electric and 25 are hybrid, which employees 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. By the end of 2023, the company had a total of **394 electric or hybrid cars in its fleet of vehicles**, including those used for car pooling, more than double

that of the previous year[87]. In addition, **41 charging points** for electric or plug-in hybrid vehicles have been installed at the company's locations, of which 31 are located at the Rome Viola site and 10 at the Rho site.

Finally, the company has provided all of its employees with digital business cards which can be used directly from their smartphones. A simple app allows the downloading of a QR code with the employee's professional data. The data are updated automatically if the employee's role at the company changes.

Greener and smarter shops

Wind Tre is continuing with its initiative to **restyle its shops to make them more sustainable** from an environmental perspective.

Following on from the activities already launched in 2022, newly opened shops have been equipped with **digital signage** technology which enables the transmission of commercial content on the store's monitors without requiring the printing and sending of paper material, a new type of LED lighting, and a platform which monitors 15 parameters in each shop in order to improve air quality and the efficiency of air exchange systems with the aim of reducing energy consumption. In 2023, the use of **OTPs** (**one-time passwords**) via SMS to digitally sign documents brought about a significant reduction in the use of paper within the company. This will be consolidated during the course of 2024 through solutions complementing the use of SMS alone in order to achieve a completely paper-free environment.

During the course of 2023, Wind Tre introduced the **SMART SCANNER** document verification system at all of its single-brand shops. This system eliminates the need to photocopy customers' ID documents and means that there's no need to keep a paper copy of contracts. It was also necessary to complement the 'SMART SCANNER' system with the development of an app for cases which cannot be processed using a physical scanner (e.g. remote customers). This app was tested at the end of 2023 and will go live in 2024.

Finally, in 2023 Wind Tre launched a project aimed at transforming its points of sale to make them welcoming and pleasant places where people can learn and deepen their knowledge about topics relating to digitalisation and the responsible use of the Internet. A targeted training course means that shop assistants – as well as being able to offer commercial solutions and technical support – will be able to assume the role of personal digital trainers and invite customers to experiment with new technologies by providing ongoing, free support and guiding them through the digital world. This programme, offered in collaboration with the POLIMI Graduate School of Management, the business school of the Polytechnic University of Milan, is an integral part of Wind Tre's journey in line with the principles of innovation, sustainability, and caring for people.

Green logistics

With a view to optimising the environmental impact of its transport and logistic operations, Wind Tre **has selected DHL as a partner**. DHL is a global leader in the sector and has been pursuing a clear strategy of green logistics for some years, with the aim of eliminating emissions associated with its logistics by 2050.

DHL's commitments in relation to green logistics are in line with Wind Tre's own objectives:

1. **To ensure transparency** - To determine and monitor the company's carbon footprint in order to provide valuable information on the environmental impact of transport and logistics operations

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[87] Total number of cars in the company fleet as of the 31st of December 2023: 1,553 (26% electric/plug in)

2. **To optimise the company's environmental footprint** - DHL offers a range of service options for minimising and/or eliminating emissions associated with logistics, 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

DHL's green logistics approach has resulted in a number of important actions. These include the opening of the warehouse in Liscate, which is also used for Wind Tre, the establishment of a geothermal and photovoltaic plant, procuring over 90% of the electricity the company uses from renewable sources, and adherence to the GoGreen carrier programme, which is aimed at selecting increasingly sustainable transport providers. The company has an energy management strategy for all of its warehouses and has also obtained ISO 14001 and ISO 50001 certification for this purpose.

Wind Tre performs regular alignments with DHL on topics associated with sustainability in order to monitor the progress of proposed actions.

Smart technologies for society and the environment

[GRI 3-3]

350 million	1 in 5	900 million euros
The tonnes of CO_2 emissions prevented worldwide by 2050 thanks to the digitisation and smart management of buildings	The number of Italian municipalities which, in 2022, launched at least one smart city project (2 in 5 with more than 15,000 residents)	The size of the Italian smart city services market (+23% in comparison with the previous year)
(International Environmental Agency, 2021)	*(POLIMI,2022)*	*(POLIMI,2022)*

Smart technologies start off with a high potential in terms of their social, economic, and environmental impact. Today, the **digital transition and green transition are two challenges which go hand-in-hand**, bound by a common thread of compatibility to form what we call the 'twin transition'. Digitalisation actually has the potential to help to reduce greenhouse gas emissions in various sectors and to improve adaptation to climate change, and **the effective use of digital technologies can help to disassociate growth from the use of resources** to enhance circular business models[88].

By 2050, 70% of the world's population will be concentrated within cities[89], where approximately 2/3 of all energy is consumed each year, and where over 70% of the world's greenhouse gas emissions are generated[90]. 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 gave rise to the concept of the **smart city**, which models a city which uses connected and integrated technology systems in order to provide innovative solutions for the sustainable and intelligent management of spaces and services. **The advent of 5G and the improvement of networks and infrastructures are a fundamental part of this process**. Applications in this area include monitoring air quality, energy management, traffic modelling, street lighting, smart parking systems, management of crowd flows, and emergency response management.

In Italy, the smart city market – cities which are intelligent and sustainable – is growing significantly. 28% of all Italian towns started at least one smart city project in the three-year period between 2019 and 2021, with this figure rising to 50% if we consider only towns and cities with more than 15,000 residents. In 2022 alone, the market grew by 23% in comparison with the previous year to reach 900 million euros, with one in five towns and cities launching a smart project last year[91].

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88 European Council: Council conclusions on Digitalisation for the Benefit of the Environment, 2020

89 The World Bank: Urban Development, 2020

90 IEA: Empowering Cities for a Net Zero Future, 2021

91 School of Management of the Polytechnic University of Milan, Smart City watchdog 2022.

This growth is also demonstrated by the **exponential increase in machine-to-machine (M2M) SIMs, which have the specific purpose of inter-machine communication**. This dissemination of this type of SIM, an indicator of how widespread smart equipment is in Italy, has grown constantly over the last decade, increasing from 20.3 million (19.59% of the total) to 28.6 million (26.70% of the total), while SIMs intended for human communication have seen a decline from 83.3 million (80.41% of the total) to 78.5 million (73.30% of the total)[92].

Our commitment

- Collaborating with the towns and cities to meet the growing demand for urban recovery and resilience solutions
- Enabling innovative services for the digital and ecological transition with our technologies
- Helping stakeholders to bridge the digital cultural divide
- Stimulating discussion on the impact of technologies on the future of cities and the environment
- Reaping the benefits of process digitisation and enabling our customers to do so as well

Our ESG goals

Goal	Horizon	Ambition	Courses of action	The point we're at
Smart partner for 100 smart cities	2030	To support cities and territories in transitioning towards smart and sustainable communities	• **Screening of relevant towns and cities** and identification of their needs • Identification of possible solutions and **proof of technical and economic concept (POC)** • Contact with local PAs, **round tables** with consumer associations and PAs, participation in local innovation hubs (such as CTEs), and sponsorship of relevant events • An **educational programme** to help PAs to implement new technologies and skills such as 5G, data science, and cloud solutions	• Establishment of memoranda of understanding aimed at supporting local governments during the digital transition: 25 Italian cities have signed the protocol • Development of a portfolio of innovative services based on big data analytics, IoT apps, and apps for energy efficiency and School 4.0. • Energy Supervisor: an ICT solution for the digital management of energy consumption and expenditures • Launch of the Smart City Transformation Academy • Support for the 'Case delle Tecnologie Emergenti' (CTE) schemes in L'Aquila (SICURA house of emerging technology), Rome and Cagliari • Renewal of membership in the 'Federated Innovation @MIND' programme in Milan and the CAMPANIA Digital Innovation Hub (DIH) • Support for winners of the MIMIT call for proposals, including Aosta and Vanvitelli University

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[92] Openpolis processing of AGCOM data, 2022

Solutions designed to make towns and cities more digital and sustainable

Aware of the impact which technologies can have on the promotion of the digital and sustainable transformation of towns and cities from a smart city perspective, during the course of 2023 Wind Tre consolidated its **B2G (business-to-government) offering in order to respond concretely to the growing demand for urban digitalisation and resilience solutions**, with a particular focus on schools and improving mobility and tourisms services.

In the context of the **'Smart Cities' project**, which is part of the company's ESG plan, the company has defined a model to help towns and cities with their digital and sustainable transformation, and has formed a multidisciplinary team to guide progress in this area. A model that begins with listening, sharing, and transferring skills, and culminates in the development of concrete trials. With this in mind, in 2023 the company signed **18 new protocols of cooperation**, over and above the 7 already signed in 2022, to bring the total number of Italian towns and cities actively involved in the project to 25. The project aims to disseminate skills and facilitate the joint testing of services in areas such as tourism and mobility analysis, energy efficiency, and digital communication with citizens, such as streaming board meetings and broadcasting mass alerts in the case of emergency situations.

More specifically, the Wind Tre portfolio of services, which also draws upon partnerships with innovative companies in the ICT world, offers various types of solution such as these:

- **Big data analytics for transport, tourism, and commerce**: the web dashboard designed for people involved in the planning, management, and analysis of urban mobility, tourism, or commerce, which enables the easy and effective analysis of people's movements in specific areas of interest on the basis of anonymous data from millions of customers processed using sophisticated ad-hoc algorithms.

- **Mass alerting**: a software platform for the management of 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 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**. It is also possible to quickly create and modify the database of users with access to the various types of communication, including information campaigns using text messages/e-mails or push notifications for specific or recurring events as well as services for teachers and students such as online tutorials and tools or access to e-books and web pages with certified content which can be used on any type of device (smartphones, tablets, PCs, laptops, etc.).

- **'Scuola 4.0'** (School 4.0): a service aimed at helping Italian primary and secondary schools in the process of transformation from traditional classrooms into innovative learning environments (**next generation classrooms**). The project also provides support for the creation of labs for the digital professionals of the future for pupils in the final years of secondary school (**next generation labs**). The aim is to introduce innovative digital technologies for the continuous improvement of the quality of services provided to students and teachers.

- **Energy Supervisor**: an energy management service which enables the checking of invoices and energy consumption in order to reduce the costs and environmental impact of public bodies (councils, museums, and hospitals) (see the next chapter).

In addition, **2023 saw the birth of the 'Smart City Transformation Academy', a free digital education initiative developed in collaboration with Forum PA.** This academy, launched by Wind Tre as part of the 'Smart City' project, is mainly targeted at the local administrations which are taking part in the project.

The initiative, for example, focuses on digital technologies for environmental improvement, saving energy, innovation, mobility, efficient tourism, and the optimisation of public services.

Assisting local governments with the digital transition

In 2023, Wind Tre continued to work hand-in-hand with local governments and their institutional representatives to extend, strengthen, and modernise digital infrastructures and to enable the dissemination of new technologies. In fact, 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 to help citizens and the local area and to stimulate an increasingly broad and inclusive digital culture.

For this purpose, Wind Tre supported local administrations as an institutional sponsor of several major events: Modena Smart Life, Turin Popular Digital Festival, the Lecce 'Mind the gap' conference, Genova Smart Week, and the 40th Annual Assembly of ANCI, the National Association of Italian Municipalities.

The Modena Smart Life digital culture festival, in collaboration with the Municipality of Modena and Fondazione Collegio San Carlo, provided an opportunity to discuss topics relating to society and inclusion. Wind Tre participated in the talk 'Scuola e Famiglia di fronte alla sfida del digitale' (School and family in the face of the digital challenge), which addressed the informed use of new technologies, particularly among younger people. The company was also involved in the Modena Smart City panel, which examines solutions offered up by analytics to support the active policies of the administration.

Participating in Turin Popular Digital Festival, in collaboration with Fondazione Italia Digitale, gave Wind Tre the opportunity to present its 'Connected Villages' project as part of a major event actually dedicated to the concept of inclusivity and to the equal dissemination of technology among all members of society, in the presence of important figures from the worlds of politics, academia, and society.

Again in collaboration with Fondazione Italia Digitale, the company took part in Lecce's 'Mind the gap – Il digitale contro le diseguaglianze' (Mind the gap – digital technology against disparity) event, the company's opportunity to attempt to contribute to the responsible and sustainable dissemination of digital technology in the south of Italy. The event was organised to involve representatives from institutions, academia, business and the world of communications, at both provincial and regional levels.

During the Genova Smart Week event, which was sponsored by the Genova Smart City association and the Municipality of Genoa, Wind Tre was able to concretely illustrate urban digitalisation solutions by presenting its experience in the new technological challenges relating to the issue of digital sustainability.

The 40th National Annual Assembly of ANCI, which took place in Genoa, was another opportunity for Wind Tre to present its sustainability projects to participating administrators. Wind Tre welcomed several local administrators who were attending the assembly to its stand and signed the 'Smart City' protocol with the Mayor of Imola.

In addition to these important opportunities for discussion and exchanging ideas, in 2023 Wind Tre also supported several administrations in carrying out 'Case delle Tecnologie Emergenti/CTE' (Houses of Emerging Technologies) projects. These projects are carried out in association with the MIMIT support programme for emerging 5G technologies, 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, the IoT, and artificial intelligence in conjunction with the development of next-generation 5G networks. The administrations include the Municipality of Rome, which is striving to improve tourism and mobility through the use of innovative technologies, that of L'Aquila, where Wind Tre is supporting the SICURA house of emerging technology with its connectivity project, and that of Cagliari, which is again focusing on mobility and tourism trends. Wind Tre has also supported certain winners of the MIMIT *5G and Audiovisual* call for proposals, including Aosta and Vanvitelli University.

Working together for innovation

[GRI 203-2a]

During 2023, 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 has hosted 5G experimentation activities

and intends to promote future innovative projects for the capital city of the Abruzzo region such as the SICURA project associated with MIMIT's (previously MiSE's) **Casa delle Tecnologie Emergenti (CTE)** call for proposals and the EXTENSION project associated with the ESA cultural call for proposals concluded during 2023 with the final testing, by some citizens of the city of L'Aquila, of an application to support tourism and the monitoring of cultural heritage.

As mentioned above, in addition to the L'Aquila CTE, Wind Tre participated in the projects of the CTEs of Rome and Cagliari in 2023.

In 2023, Wind Tre also reaffirmed its participation in the **Federated Innovation@MIND** programme (a public/private partnership model conceived at MIND – the 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 to 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 to improve communication and collaboration between students and teachers and to monitor school environment quality parameters.

Project 386 was another innovative project carried out in 2023 by Wind Tre together with other Federated Innovation partners within MIND. The aim of the project was to monitor the progress of work on construction sites through the use of drones and the construction of digital twins of the buildings so that they could be compared with reference designs (BIM). The automatic progress report service has significant benefits in terms of safety (fewer personnel needed to be physically present in the work areas) and reporting accuracy.

Wind Tre is also participating in the **CAMPANIA Digital Innovation Hub** (DIH), a consortium with a vision of creating 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. CAMPANIA DIH is involved in the Digital Europe Programme of the European Union, helping to digitally transform European societies and economies, and forms part of the European Digital Innovation Hubs (EDIH) network, which has the task of ensuring the digital transition of industry – particularly SMEs – and of the public administration through the adoption of advanced digital technologies, artificial intelligence, high-performance computing, and cybersecurity.

In January, as part of the set of innovation projects funded, the project 'Restart' ('Research and innovation on future telecommunications systems and networks', www.fondazione-restart.it) was launched. Within the scope of the Italian Recovery and Resilience Plan (PNRR-MUR-M4C2), this project directly involves telecommunications operators and universities with telecommunications faculties. The aim of the initiative is to define the 'telecommunications of the future' – with a view to the next decade – through the study and definition of new technologies, identifying new market opportunities and generating new trends. Wind Tre's main activities in the project during the course of 2023 focused on defining new network architectures which are integrated with digital twin technologies, analyses relating to the integration of terrestrial and non-terrestrial networks, the evolution of smart grid solutions with energy community and battery integration, the definition of algorithms for complex intersections for autonomous driving, studying sensing capabilities for fibre optics, and innovative models of distribution optimisation for new multimedia content.

During the first six months of the year, the 'Prato Phygital' project took place, financed by MIMIT. This important partnership conducted two significant experiments: the digitisation of certain fabrics which can no longer be physically reproduced, from the Prato Textile Museum, along with their use in the metaverse,

including experimenting with new fashion show models and even the representation of new digital objects; and the realisation of the first virtual production sound stage, which uses the integration of multi-access edge computing infrastructure to allow remote spectators throughout the country to watch the show taking place on the stage through 3D technology in real time on their mobile devices.

During 2023, Wind Tre continued to actively participate in various projects relating to Horizon 2020:

- 5G-Induce (www.5g-induce.eu): 5G edge computing platform development project, in which each developer can create and distribute customized applications and offer solutions, within Industry 4.0, for the creation of automation in production control
- 5GMeta (www.5gmeta-project.eu):an open-source platform which collects together the enormous amount of information generated by cars and drivers in real time in order to develop innovative products and services
- Smart5Grid (www.smart5grid.eu): open 5G experimental structure, responsible for studying the possible synergies between 5G and the energy distribution network, to improve the speed of repair of network faults, promote service continuity and optimize the supply and distribution phases

The 'Braine' project has been concluded with a positive reaction from the sponsoring bodies (www.braine-project.eu).

The project drew attention to the application of artificial intelligence in edge computing technologies.

Again within the remit of Horizon 2020, Wind Tre supported the 'NEMO' ('Next Generation Meta Operating System', www.meta-os.eu) project with the aim of introducing innovations for IoT applications.

As part of 'Horizon 2020 Marie Skłodowska-Curie European Training Network on Internet of Things', Wind Tre supported the IoTalentum project (www.iotalentum.eu) for the training of 15 doctorate students in the IoT field, hosting one student directly and ensuring the delivery of courses aimed at providing a detailed explanation of the features of 5G networks for all of the participants in the project.

In October 2023, Wind Tre received confirmation of its participation in the '5G4Lives' project as part of the 'EU - 5G for Smart Communities' initiative. For this project, which starts in 2024, Wind Tre will provide 5G technology to the municipal administration and the police forces of the city of Turin, for the security of the country through drones and monitoring tools.

Finally, through Asstel (a Confindustria trade association), Wind Tre promoted the **Smart School** project, which proposes a single holistic solution to meet the need of students, teachers, school administrators, families, the Ministry of Education, universities, and research institutions for a digital school model which provides users with a simple, cost-effective, and efficient tool.

Energy Supervisor for Energy Efficiency

In order to ensure a constant reduction in CO_2 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

This service allows companies and public bodies to enjoy the following main benefits:

- **Automation** of the process of collecting cost and consumption data
- Monitoring of **energy efficiency parameters** following a specific investment (e.g. a photovoltaic panel) and reduction in the average ROI time
- **Cost control** through the automatic checking of invoice accuracy and the precise definition of energy profiles
- **Transparent and correct communication** of data relating to cost reduction, consumption, and sustainability parameters (e.g. reduction in CO_2 emissions)

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[93], which requires the verification of the hourly and daily average power, applies.

It is widely known that the current electromagnetic field (EMF) limits in Italy are significantly lower than those in the rest of Europe (6 V/m in comparison with an average of 40-61 V/m). Since, to date, epidemiological studies have not found any causal links between electromagnetic emissions and diseases, Wind Tre is seeking to obtain a change in regulations to bring the EMF limits provided for in Italian law into line – or at least to increase them somewhat – in order to facilitate the full development of 5G networks and all associated services. Italy's Competition Act of 2022 initiates the process of raising the EMF limits: within 120 days of the Act coming into force, a prime ministerial decree will be issued to bring Italian limits into line with European

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[93] 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).

limits; if the decree is not issued within 120 days, the EMF limits shall be considered to be set provisionally at a level of 15 V/m until such time as the decree is issued.

Genoa's smart port

In 2023, Wind Tre developed a private network for PSA Italy to provide a new 5G radio coverage and data centre connectivity system which will enable new IT functions at the Port of Genoa.

PSA Italy, which forms part of PSA International, operates three ports in Italy – PSA Genova Prà, PSA Sech, and PSA Venice – handling more than 2 million containers each year and employing more than 1,000 people. In 2015, the Port of Genoa launched a global renovation project with the aim of making its operations more efficient, modern, and safe.

The Wind Tre initiative will involve the planning, realisation, and installation of a private, high-performance 5G network at the port terminal to support this objective. Ports are demanding industrial environments subject to special requirements, so the solution needs to be reliable, secure, scalable, and able to provide high-performance connectivity and reduced network latencies.

5G is the first step towards dealing with future technological challenges as digitalisation accelerates in a sector with huge strategic importance in Italy, in which technological innovation can make an extremely significant contribution to increasing competitiveness and infrastructure efficiency.

Closing the circle

With the aim of becoming more and more efficient in the use of resources, Wind Tre has introduced the **'green' SIM card**[94]. Wind Tre's SIMs are produced by Thales, a leading company in the production of eco-SIMs. The SIMs are half the size of standard SIMs and are **made from 100% recycled plastic** by means of a production process which eliminates CO_2 emissions.

In addition, Wind Tre – through a wide-reaching network of more than 500 centres throughout Italy – offers a board and comprehensive range of after-sales services for devices, guaranteeing fast, top-quality repairs using original spare parts and facilitating the reuse of products and the extension of their useful life.

The goal is to **improve customer satisfaction and extend the life cycle of the devices themselves** by providing options for customers to reuse and repair their products.

Moreover, in over 30% of cases, Wind Tre replaces modems which do not work with pre-owned products which have been refurbished and cleaned by specialist companies, allowing fixed network customers to use a product which works perfectly well while limiting the production of electronic waste. **In 2023 alone, a total of around 22,000 modem products were refurbished**.

Similarly, a comprehensive service is provided for mobile business customers which, in 77% of cases, allows them to replace their faulty smartphone with a refurbished one. **In 2023, about 4,800 smartphones belonging to Business customers with the Kasko service were refurbished.**

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[94] Only SIMs for human customers; the green SIMs cannot be used for machine-to-machine (M2M) connections.

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 Bolttech 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).

Thanks to a partnership with Enjoy, a company which specialises in this field, Wind Tre has added **refurbished smartphones** to its portfolio of devices. **The refurbished models are available with all the Wind Tre mobile offers, and can be paid for in instalments.**

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_2 emissions in comparison with buying a new device; it also limits the mining of rare minerals, mainly used for motherboards and batteries, and consequently reduces WEEE, i.e. the waste materials generated by electronic devices which need to be disposed of.

In the previous year, Wind Tre had already launched '**Reload exChange**', its trade-in service. 'Reload exChange' allows Wind Tre customers to trade in their used phone at a Wind Tre store and receive a cash payment of up to 800 euros – depending on the smartphone returned – directly to their bank account. The used smartphone is valued at the store using a diagnostics app which provides a quote of the phone's value within minutes. In addition, customers who subscribe to the 'Reload exChange' service can purchase a new smartphone at a special price. This service is provided by Wind Tre in partnership with Bolttech Device Protection (Italy) s.r.l.

VERY MOBILE: Green SIM cards and refurbished mobile phones

Very Mobile[95], a brand owned by the CK Hutchison Holdings Ltd. Group to which Wind Tre S.p.A. belongs, has also 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_2 emissions[96].

Awareness of green issues has been part of the Very brand's DNA since its inception in 2020. The brand's environmental awareness action consists of numerous activities including the creation of the verycreativi.it website, which has given anyone who feels the urge the opportunity to express themself creatively online without tagging walls of their 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 launch eSIMs, allowing users to activate service plans without having to physically insert SIM cards into their smartphones

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[95] Very Mobile, a brand of the CK Hutchison Holdings Ltd. Group, is 100% operated by Wind Tre, and therefore falls within the scope of reporting.

[96] The plastic used to make these SIMs is derived from polystyrene recovered from scrapped refrigerators. This white plastic, traditionally used inside refrigerators, is transformed into raw material which is then used to create the finished body of the SIMs.

On 14 February 2022, Very also launched the sale of **refurbished smartphones** on its website, in partnership with the Austrian company refurbed™. In addition to being convenient and eco-sustainable, refurbished smartphones also provide for considerable savings in terms of both money and CO_2 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 date they consume each month into 'Green Gigabytes', which can be used to help support eco-sustainable and environmental protection projects throughout our country.

This programme is available in a 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. In 2023, thanks to the support and participation of their customers, Very was able to help to support the reforestation project in Val di Fiemme, which was hit hard by Storm Adrian in 2018, through the planting of 1,000 new trees, thus contributing to restoring the area and returning it to the community.

The green projects conducted during 2023 also include the cleaning of three Italian beaches – Maddalusa (Agrigento), Voltri (Genoa), and Capocotta (Rome) – helping to remove more than 500 kg of waste from 3 km of beach.

Very's commitment to the environment will continue in 2024, as the 'Giga Green' programme promotes new projects with the support of specialist partners to help to preserve our country's territory.

The origin of this document

[GRI 2-14]

Year after year, the Wind Tre Sustainability Report demonstrates the company'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 2023 financial year (1st of January – 31st of December) with comparisons with the same information from 2022 and 2021 and – wherever possible – that from 2020 and 2019. The economic and financial data and the key indicators are consistent with the information in the reporting package provided by the company 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 based on operational control[97] [GRI 2-2].

This document was drawn up in accordance with the 2021 Global Reporting Initiative (GRI) standards, which are now the most widely used standards for sustainability reporting used internationally. 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 2023 edition of Wind Tre's ESG report was structured around seven material topics identified through a materiality analysis. In particular, the GRI defines material topics as topics which represent an organisation's most significant impacts on the economy, environment, and people, and which are therefore capable of influencing the decisions of the company and of its stakeholders.

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[97] Operational control applies to all 100% subsidiaries. For more information, see 'The corporate structure'.

The GRI content index contains references to the material topics as well as all of the information reported by the company in accordance with the requirements of the 2021 GRI standards along with its position within the document. The content of the sustainability report is the result of joint work which takes place every year with the involvement of all of Wind Tre's departments in order to gather together all of the most relevant information relating to the activities of the various departments. The departments approve the final version of the document and ensure a full and timely flow of information which, over time, has guaranteed the robustness of the adopted reporting model. External Affairs & Sustainability coordinates the project to ensure consistent results. The final document is approved by the departmental director, shared with the Management Team – the highest governing body of the Wind Tre Group – and sent to all members of the Board of Directors for inspection.

The index of reported GRI content can be found at the end of this document. The Wind Tre Sustainability Report is published on our Internet site at 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:

<div align="right">

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GRI content index

GRI content index

Wind Tre has submitted a report compliant with the GRI standards for the period from 1 January 2023 to 31 December 2023
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. 13)	
	2-2 Entities included in the organization's sustainability reporting	The corporate structure (p. 13) The origins of this document (p.111)	
	2-3 Reporting period, frequency and contact point	1 January 2023 - 31 December 2023 (same period as the cash flow statement) publication date april, 2024	
	2-4 Restatements of information	The corporate structure (p. 13) The ESG 2030 Plan (p. 24) Clarity and transparency in commercial communications (p. 62)	
	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.117)	
	2-6 Activities, value chain and other business relationships	Who is Wind Tre? (p.11) Business ethics and integrity (p.32) Sustainability in the supply chain (p.41)	
	2-7 Employees	The Wind Tre team (p.84)	
	2-8 Workers who are not employees	The Wind Tre team (p.84)	
	2-9 Governance structure and composition	The corporate structure (p.13)	
	2-10 Nomination and selection of the highest governance body	The corporate structure (p.13)	
	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. 27) 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. 27)	
	2-14 Role of the highest governance body in sustainability reporting	The sustainability governance model (p. 27) The origins of this document (p.111)	
	2-15 Conflicts of interest	Corporate governance (p33) The fight against corruption and conflicts of interest (p. 35)	
	2-16 Communication of critical concerns	Corporate governance (p33)	
	2-17 Collective knowledge of the highest governance body	The sustainability governance model (p. 27)	
	2-18 Evaluation of the performance of the highest governance body	The sustainability governance model (p. 27)	
	2-19 Remuneration policies	The sustainability governance model (p. 27)	
	2-20 Process to determine remuneration	The process of rewarding (p. 28)	
	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 (p.2)	
	2-23 Policy commitments	Corporate governance (p33)	
	2-24 Embedding policy commitments	Corporate governance (p33)	
	2-25 Processes to remediate negative impacts	Stakeholder and relevant topics (p.22) The pursuit of shared solutions (p. 59)	
	2-26 Mechanisms for seeking advice and raising concerns	Whistleblowing (p. 36)	
	2-27 Compliance with laws and regulations	Main regulatory proceedings. Compliance with laws and regulations (p. 37)	
	2-28 Membership in associations	•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) Furthermore Wind Tre participates in: •CONSEL, the ELIS Consortium for higher professional training, whose primary goal is to support young people in their transition to the world of employment	
	2-29 Approach to stakeholder engagement	Stakeholder and relevant topics (p.22)	
	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 3 - Material Topics	3-1 Process to determine material topics	Stakeholder and relevant topics (p.22)	
	3-2 List of material topics	Stakeholder and relevant topics (p.22)	
	3-3 Management of material topics	Stakeholders and relevant topics (p. 22) Child protection in the digital domain (p.43) Cybersecurity and Privacy (p.47) Digital Divide (p.62) Inclusion of disabilities (p.71) Lifelong digital learning (p.78) Decarbonisation (p.92) Smart technologies for society and the environment (p.101)	

Specific standards

GRI Standard	Disclosure	Location
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. 52)
Cybersecurity and Privacy		
GRI 203 - Indirect economic impacts	203-2 Significant indirect economic impacts	Focus on data security (p. 49)
Digital Divide		
GRI 203 - Indirect economic impacts	203-1 Infrastructure investments and services supported	Digital accessibility (p.73)
Lifelong digital learning		
GRI 404 - Training and education	404-1 Average hours of training per year per employee	Continuous skill development (p.79)
	404-2 Programs for upgrading employee skills and transition assistance programs	Continuous skill development (p.79)
	404-3 Percentage of employees receiving regular performance and career development reviews	Continuous skill development (p.79)
GRI 203 - Indirect economic impacts	203-1 Infrastructure investments and services supported	Lifelong digital learning (p. 78)
Inclusion of people with disabilities		
GRI 203 - Indirect economic impacts	203-1 Infrastructure investments and services supported	Digital accessibility (p.73)
Decarbonisation		
GRI 305 - Emissions	305-1 Direct (Scope 1) GHG emissions	Zero-emissions goal (p. 94)
	305-2 Energy indirect (Scope 2) GHG emissions	Zero-emissions goal (p. 94)
	305-3 Other indirect (Scope 3) GHG emissions	Zero-emissions goal (p. 94)
	305-4 Intensity of GHG emissions	Zero-emissions goal (p. 94)
	305-5 Reduction of GHG emissions	Zero-emissions goal (p. 94)
GRI 203 - Indirect economic impacts	203-1 Infrastructure investments and services supported	Zero-emissions goal (p. 94)
GRI 302 - Energy	302-1 Energy consumed within the organisation	Zero-emissions goal (p. 94)
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.101)
	203-2a Significant indirect economic impacts	Working together for innovation (p. 105)

Other Topics

GRI Standard	Disclosure	Location
Business ethics and integrity		
GRI 308 - Supplier environmental assessment	308-1 New suppliers that were screened using environmental criteria	Sustainability in the supply chain (p.41)
GRI 414 - Supplier social assessment	414-1 New suppliers that were screened using social criteria	Sustainability in the supply chain (p.41)
Closer to our people		
GRI 401 - Employment	401-1 New employee hires and employee turnover	The Wind Tre team (p.84)
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Caring for people (p. 89) The establishment of 'significant operating locations' is not applicable
	401-3 Parental leave	The Wind Tre team (p.84)
GRI 403 - Occupational health and safety	403-5 Worker training on occupational health and safety	Continuous skill development (p.79) Occupational health and safety (p.91)
	403-9 Work related injuries	Occupational health and safety (p. 91)
	403-10 Work-related ill health	Occupational health and safety (p. 91)
GRI 405 - Diversity and equal opportunity	405-1 Diversity of governance bodies and empl	The Wind Tre team (p. 84) Focus on diversity & inclusion (p. 68)
	405-2 Ratio of basic salary and remuneration of women to men	Focus on diversity & inclusion (p. 68)
Closer to our customers		
GRI 417 - Marketing and labelling	417-3 Incidents of non-compliance concerning marketing communications	Clarity and transparency in commercial communications (p. 62)

Calculation criteria

Electric energy consumption

The electricity consumption[98] 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 company 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 reporting year multiplied by the kWh/litre conversion coefficient proposed by the Greenhouse Gas Protocol.

Conversion factors utilised [GRI 302-1 g]:

- 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 greenhouse gas emissions (Scope 1, Scope 2, and Scope 3) corresponds to the operational control criterion, all the emissions of the 100% subsidiaries are attributed to Wind Tre [GRI 305-1f, 305-2f].

The calculation of the Scope 1 (direct) emissions includes 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)[99]

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 takes into account all CO_2 emissions plus emissions of other gases (CH_4 and N_2O) expressed as CO_2 equivalents.

- The used GWP is 21 for CH_4 and 310 for N_2O [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_2 equivalent emitted in relation to the volume of fuel consumed)

The conversion factors for the calculation of indirect emissions from electricity for the 2019 − 2021 period (gCO_2 emitted per kWh of 276.3 gCO2/kWh) are derived from Table 2.4 of the ISPRA publication 'Fattori di emissione per la produzione e il consumo di energia elettrica in Italia, 2020' (Emission factors for electricity production and consumption in Italy, 2020). The electricity consumption emission coefficient is determined by the generation percentages of the Italian electrical sector over the various years. For 2022 and 2023, in accordance with the approach adopted by the parent company CK Hutchison Holding, the conversion factors of IEA Emissions Factors were used.

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[98] The data related to electricity consumption is calculated as of 29 February 2024 and does not take into account any subsequent billing updates.

[99] Due to the difficulty in finding specific data, for the calculation of the release of refrigerant gases, the data relating to Zefiro.net were prudently kept in the calculation for 2023 as well.

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

Description	Units of measurement	Conversion factor CO_2				
		2023	2022	2021	2020	2019
Electrical consumption	g CO_2/kWh	350.8	269	276.3	276.3	276.3
Diesel, heating, generation, haulage	g CO_2 /Litre	2.48	2.52	2.65	2.65	2.65
Natural gas, heating and haulage	t CO_2 / $Stdm^3*10^3$	2.01	2.02	1.972	1.972	1.972
Petrol	g CO_2 /Litre	2.08	2.38	2.38	2.38	2.38

As defined by the parent company CKHH, which is in charge of collecting the data for each of the Group's companies and for the associated calculation of CO_2 emissions, the following category-based methodological approach was used for the Scope 3 category analysis:

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
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
4) Upstream transportation and distribution	Upstream devices	Total volumes of devices purchased The LCA data for specific devices were taken from publicly available sources published by several major vendors
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
11) 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

Statement of assurance

Assurance Statement addressed to WIND TRE S.P.A. stakeholders

1. INTRODUCTION

WIND TRE S.p.A. has commissioned Bureau Veritas Italia S.p.A. ("Bureau Veritas") an independent assurance of its 2022 Sustainability Report (henceforth, "2023 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 2023 Report, in particular Global Reporting Initiative Sustainability Reporting Standards (GRI Standards v. 2021).

2. RESPONSIBILITY, METHODOLOGY AND LIMITATIONS

WIND TRE S.p.A. alone had the responsibility of collecting, analyzing, collating and presenting information and data included in its 2023 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 with 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 2023 Report;
- interviews to company representatives from various functions and levels as well as members of the Management;
- overall verification of information and general content of the 2023 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 2023 Report, both for the part concerning Wind Tre Italia S.p.A. and for its 100% subsidiaries ("WIND TRE"), with the following limitations: for activities outside the reference period (1 January 2023 – 31 December 2023) and for statements of policy, intent and objective, Bureau Veritas verified their consistency with the reference methodological assumptions.

3. CONCLUSIONS

Following the assurance activities described above, nothing has come to our attention to indicate that information and data in the 2023 Report are inaccurate, incorrect or unreliable. In our opinion, the Report provides a trustworthy representation of the activities carried out by WIND TRE during 2023 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 declared by the organization in the preparation of 2023 Report, in our opinion the quality assurance principles of the 2021 GRI Guidelines (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 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 5,9 billion euro (revenues 2023).

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, 04 April 2024

Gloria Focetola
Local Technical Manager