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Wind Tre Environmental Policy

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1) PURPOSE

The purpose of this Policy is to establish guiding principles that steer the company's environmental activities toward more sustainable management, integrating these commitments into the company's strategy and organisation. This aligns with the company's commitment to operate responsibly, addressing the needs of its various stakeholders.

The Wind Tre Group is dedicated to raising awareness and promoting environmental protection among its employees, customers, supply chain, value chain, and other stakeholders. The company also encourages them to follow the practices outlined in this Policy, wherever possible, to enhance their commitment to environmental responsibility.

2) REFERENCES

- CKH Sustainability Policies (https://www.ckh.com.hk/en/esg/esg_policies.php)
- Wind Tre ESG Policy
- Code of Conduct
- Anti-Fraud and Anti-Corruption Policy
- Supplier Code of Conduct
- Anti-Fraud and Anti-Corruption Guidelines for Suppliers
- Organisational Model for Wind Tre Group Companies
- Integrated Quality Management System
- Wind Tre Integrated Policy
- ISO 14001:2015, Environmental Management
- Annual Sustainability Report
- Sustainable Procurement Policy

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3) DEFINITIONS AND ABBREVIATIONS

Wind Tre Group (hereinafter also “Wind Tre” or “Company”)	Wind Tre Italia S.p.A. and all companies directly and/or indirectly 100% owned by Wind Tre Italia S.p.A.
ESG	Environmental, Social and Governance. Evaluation criteria that provide a measure of the company’s sustainability and responsibility with regard to environmental, social and governance aspects
Stakeholders	Subjects, individuals or organisations that have interests in the performance of a company to which they are connected through various types of relationships: (customers, creditors, managers, employees, shareholders, public institutions, suppliers, trade unions, communities from which the company draws its resources, etc.)
Scopes 1, 2 and 3	A way of classifying climate-altering emissions (CO ₂ and other chemicals in the atmosphere that contribute to global warming), dividing them into three segments (Scope): <ul style="list-style-type: none"> • Scope 1: direct emissions from the company's activities (primary energy consumption and emissions of other gases) • Scope 2: indirect emissions related to the purchase of electricity • Scope 3: emissions from the value chain assets that the company can influence

4) INTRODUCTION

Wind Tre recognises the link between its success and environmental protection. The company actively monitors the environmental impact of its activities, aiming to minimise its footprint and support the sustainable development of the communities in which it operates.

Aligned also with its parent company, CK Hutchison Holdings Ltd., and in keeping with its tradition and corporate culture, the company believes that achieving long-term business success requires a responsible, proactive, and structured approach to environmental issues.

Sustainability—defined as the commitment to maximise positive social and environmental impacts while minimising, preventing and if needed mitigating the negative ones—has been a core value of the company

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since its inception. This is a fundamental aspect of its Company Purpose and corporate culture, and even manifests itself in the ways that all the employees operate.

Aligned with the governance systems it has adopted, Wind Tre's approach is rooted in the belief that sustainability principles must be integrated into all company activities, spread across all departments, and promoted among external contributors to the company's success, such as suppliers and business partners.

5) FIELD OF APPLICATION

This Environmental Policy applies to all Wind Tre personnel, as well as to anyone interacting with the company, including consultants, agents, suppliers, and business partners. These individuals are not only required to comply with the law but also to uphold the highest ethical standards and align with the principles of this Policy. Furthermore, it integrates and does not replace the principles contained in all the policies and guidelines published on the institutional website www.windtregroup.it. Finally, this Policy fully incorporates the Wind Tre Integrated Policy, with particular reference to the ISO 14001 environmental management certification.

6) APPROACH

Wind Tre is committed to actively contributing to the protection of the planet and enhancing people's quality of life by driving a fair and environmentally sustainable transition through its technologies.

To this end, the Company is dedicated to mitigate the negative environmental impacts of its daily activities and empowering its customers and stakeholders to do the same by adopting appropriate behaviour and using innovative technologies, processes, and systems.

In particular, the company undertakes to:

- give particular importance to the application of all national, EU and international environmental laws and regulations.
- periodically define commitments to improve its environmental performance, especially regarding issues that are considered relevant by the company and its stakeholders.
- implement process and procedures for all the activities to manage and reduce its environmental impacts also through environmental management systems and certification.
- report periodically on the company's environmental impact and performance through its corporate website and the publication of a Sustainability Report.
- promote and raise awareness of environmental issues among employees also through internal communication and training.
- promote dialogue and discussion with its stakeholders in order to improve environmental performance and prevent, mitigate and remediate any negative environmental impacts resulting from its activities.
- research and develop innovative solutions and services offered to the customers that allow the continuous improving of the environmental impact.

7) AREAS

The company is committed to minimising its environmental impact, focusing on reducing greenhouse gas emissions, which is a critical factor in combating climate change, and striving for more efficient resource use. Wind Tre recognises the risks related to climate change, including its effects on its business model and the related implications in terms of financial planning and investment. Additionally, Wind Tre promotes the development and innovation of its services as essential tools to enhance the environmental sustainability of the cities and communities where it operates.

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Fighting Climate Change

- Wind Tre focuses its efforts on reducing CO₂ emissions across its operations, facilities, and services, recognising this as crucial in the fight against climate change.
- Wind Tre analyses its Scope 1, 2, and 3 emissions to identify sources and assess their intensity, enabling the development of strategies to reduce their impact and share this data with stakeholders. The company also certifies its carbon footprint according to the international ISO 14064 standard, with the goal of continually enhancing its analyses and improvement efforts.
- Wind Tre is committed to using innovative and efficient technologies to continuously reduce its environmental impact. By way of example but not limited to, the company is committed to periodically modernising its national transmission network so that it is increasingly energy efficient, increasing the number of low environmental impact vehicles in the company car fleet, and adopting methods capable of reducing employees' environmental impact, such as working remotely and reducing business travel.
- Wind Tre recognises the need to increase the use of renewable energies as much as possible as an essential tool to combat climate-changing gas emissions and works to continuously improve its energy mix.
- Wind Tre has introduced the risk of climate change into its Enterprise Risk Management (ERM) register, and this risk is included in the assessment and evaluation activities conducted on a semi-annual basis.

Protecting Natural Resources and Biodiversity

- Wind Tre supports the protection of nature and biodiversity, also through collaboration with associations and third sector organisations. The company recognises and promotes the sustainable use of natural resources and the protection, conservation and restoration of biodiversity, and also supports the fight against deforestation.
- The company works to continuously improve its internal procedures and processes in order to increase efficiency and reduce the consumption of day-to-day operational products such as paper, electronic equipment and the like, and to improve the sustainability of the working environment, e.g. through automatic on/off light systems and smart office sharing.
- Wind Tre recognises the importance of ongoing waste reduction, which includes recycling and reusing materials. The company actively pursues initiatives such as reducing plastic usage in offices and shops.
- Wind Tre recognizes the importance of water conservation sensitising its supply chain to adopt measures to protect against environmental pollution and promote water efficiency.

Promoting Circular Economy

- Aligned with the Group's guidelines and with the active involvement of suppliers and partners, Wind Tre promotes the integration of circular economy principles into its value chain. This includes responsible sourcing of raw materials, optimising production processes and product design, minimizing waste, reducing pollution risks, and raising awareness of sustainable practices among consumers and employees.
- The company promotes the use of materials and tools consistent with the circularity of resources, such as recycled paper and recyclable toners, and promotes circular economy initiatives aimed at ensuring the reduction and reuse of electronic waste (WEEE).

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Value Chain Management

- Wind Tre promotes the continuous improvement of the environmental impacts of its supply chain also through an appropriate management of the procurement process. Suppliers handled by Wind Tre Procurement's department adhere to the principles of this policy, also present in the Wind Tre' Sustainable Procurement Policy, and undertake to integrate the principles of environmental sustainability also within their own supply chain.
- Wind Tre undertakes to make the communities in which it operates aware of the importance of environmental conservation and to promote best practices that improve environmental sustainability, also through collaboration with third sector organisations and with central and local institutions.
- Wind Tre intends to drive the Twin Transition—both digital and sustainable—by its own investment in 5G and digital technologies. Digitalisation has the potential to significantly reduce greenhouse gas emissions across various sectors, minimise waste, optimise resource use, support the adoption of circular economy models, improve land management, and aid in climate change adaptation.
- Wind Tre aims to help businesses and consumers enhance the environmental sustainability and efficiency of their activities, as well as improve the quality of work and life, through innovative solutions developed in collaboration with commercial and technological partners. Additionally, it seeks to assist local governments in transforming their municipalities into smart, environmentally sustainable cities.

8) POLICY UPDATING AND MANAGEMENT

The External Affairs & Sustainability Division's Sustainability Department is responsible for drafting and updating this document, with the input of and in collaboration with the relevant corporate departments.

9) LIST OF ANNEXES

N°	Code	Title
1	1.0	Fighting Climate Change

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Annex

Fighting Climate Change

The company is committed to minimising its environmental impact, focusing on reducing greenhouse gas emissions, which is a critical factor in combating climate change, and striving for a more efficient resource use.

To this end, Wind Tre has defined specific targets to reduce and mitigate its impact on greenhouse gas emissions:

- Wind Tre has defined a plan for reducing to zero its emissions (CO₂ equivalent) for Scope 1 and 2 to be realized by 2030 and, in line with the parent company's guidelines, has implemented the goal of achieving climate neutrality by 2050.
- In accordance with the parent company's guidelines, Wind Tre has implemented the target of reducing indirect climate-changing emissions (CO₂ equivalents) generated upstream and downstream of its value chain (Scope 3 emissions) by 42% by 2030.
- Wind Tre makes its suppliers aware of environmental issues through the indications contained in this Policy, the ESG Policy, the Sustainable Procurement Policy and the Supplier Code of Conduct and promotes their commitment to improving their own environmental performance.
- Wind Tre is committed to reducing the emissions generated by its company car fleet through the progressive inclusion of new vehicles with low CO₂ emissions.