



MUCH CLOSER

for a more sustainable future

2024 SUSTAINABILITY REPORT

Letter to the Stakeholders

[GRI 2-22]

Dear reader,

over the last few years, Wind Tre has integrated the principles of sustainability into its daily activities, aware of the contribution that technology and digitalisation can make to the sustainable development of our society and our economic environment.

Investments in our technological capacity are aimed at strengthening the enabling factors of the sustainable transition: the acquisition of Opnet in 2024 and the construction of the standalone 5G mobile network, soon available, are tangible testimonies of this effort. The ISO/IEC 20000-1:2018 certification achieved in 2024, which attests to the company's excellence in IT service management, certifies the company's commitment to offering our customers high-quality services.

The ESG 2030 Plan, in which we have integrated most of the activities capable of generating a positive impact, include social objectives, starting with the responsibility we feel for a responsible use of digital tools by younger users: the NeoConnessi digital education initiative has reached more than one and a half million families since 2018, every year it enters more than 7,000 elementary schools and in 2025 it will also be extended to lower secondary schools. Similar digital education initiatives have been brought to more than 100 municipalities in the country's inland areas, and our effort to accompany urban communities in the digital transition extends to 41 cities across the country.

Among the people we care most there are our colleagues, to whom in 2024 we have dedicated resources to carry out over 200,000 hours of training and initiatives for well-being and gender equality. Wind Tre's commitment to the community of its people has been recognized with the awarding of the Top Employer qualification for the seventh consecutive year and with the confirmation of the Equal Salary certifications for equal pay and SA8000 for social accountability, as well as with the acquisition of the UniPdr 125 certification for gender equality.

In relation to environmental protection, we are proud to confirm the goal of taking to zero our scope 1 and 2 emissions by 2030, already reduced by 38% compared to 2020, the base year of our plan. A result made possible by the adoption of the most advanced technologies but also by the strong focus on optimizing the operation of the network infrastructure, as well as the attention to a responsible behaviour in all fields.

Our special thanks therefore go to all the people of Wind Tre, who passionately support the company's commitment to improving the social and environmental sustainability of the communities in which we operate.

Gianluca Corti and Benoit Hanssen

Co-CEOs – Wind Tre

Table of contents

Letter to the Stakeholders	2
Summary.....	6
Much closer, for a more sustainable future.....	6
THE COMPANY	10
Who is Wind Tre?.....	10
A network of people and a wide range of services	11
Identity and values.....	11
A modern and wide-reaching network	11
Telco and beyond.....	12
WINDTRE LUCE&GAS powered by Acea Energia.....	12
WINDTRE Assicurazioni insurance services.....	13
Opnet, Wholesale Company Wind Tre.....	13
The corporate structure.....	14
Part of the CK Hutchison Group.....	16
RISK MANAGEMENT.....	17
Much closer, for a more sustainable future.....	20
Wind Tre supports the Global Compact.....	20
ESG MODEL.....	21
STAKEHOLDERS AND RELEVANT TOPICS	21
THE ESG 2030 PLAN	27
THE SUSTAINABILITY GOVERNANCE MODEL.....	27
TOGETHER FOR A MORE SUSTAINABLE FUTURE	28
More Responsibility	30
Business ethics and integrity.....	30
Our commitment	31
Corporate governance	31
Sustainability in the supply chain.....	36
The integrated management system	37
EcoVadis Rating.....	38
Child protection in the digital domain	39
Our commitment	40
The NeoConnessi project.....	41

Online protection for the entire family	43
Cybersecurity and privacy	44
Our commitment	45
Focus on data security	45
Acting on the “human factor”	46
Personal data protection	48
“Please Don’t Call” protects customers from unwanted calls.....	50
Closer to our customers.....	51
Our commitment	51
Assistance channels	52
‘Informati e Sicuri’ (Informed and safe) service	53
Customer satisfaction	53
Reputation analysis	54
The pursuit of shared solutions	55
Dialogue with consumer associations	56
Clarity and transparency in commercial communications	57
More humanity	58
Digital divide	58
Our commitment	59
Connected Villages.....	60
Wi-Fi Calling	61
Gender Parity	62
Our commitment	63
Focus on diversity & inclusion.....	63
Inclusion of people with disabilities	67
Our commitment	68
Digital accessibility	68
Dedicated services	69
Internal initiatives	70
Lifelong digital learning	70
Our commitment	71
Continuous skill development.....	72
A company tailored to Generation Z.....	74
Closer to Wind Tre people	77
Our commitment	78

The Wind Tre team	78
Top Employer Italia for the seventh consecutive year	81
Caring for people	82
Occupational health and safety	84
More Green	86
Decarbonisation	86
Our commitment	87
Zero emissions goal	88
Energy efficiency projects	89
Working with WWF for the climate and biodiversity	90
Environmental awareness begins at the office	91
More sustainable and smarter stores	92
Green logistics	92
Smart technologies for society and the environment	93
Our commitment	94
Solutions designed to make towns and cities more digital and sustainable	95
Solutions in practice	96
Solutions in practice	97
Working together for innovation	98
Solutions in practice	99
Energy Supervisor for Energy Efficiency	100
Solutions in practice	100
Electromagnetic emissions under control	101
Closing the circle	101
VERY MOBILE: Green SIM cards and refurbished mobile phones	102
ANNEXES	104
The origins of this document	104
Calculation criteria	105
Main regulatory actions	107
GRI content index	111
Statement of Assurance	113

Summary

WE EXIST TO ELIMINATE THE DISTANCES BETWEEN PEOPLE

Wind Tre is a large Italian company with over 6,500 employees which operates in various sectors such as fixed and mobile telecommunications, energy, insurance, cybersecurity and ICT services. Part of the CK Hutchison Holdings Limited Group, the company is present throughout the country with the **WINDTRE** brands for the consumer market and **WINDTRE BUSINESS** for companies and public administrations.

WINDTRE is the leading Italian brand in mobile telecommunications, with coverage of 99.7% in 4G technology, 97.1% in 5G DSS and 77% in 5G TDD. It also offers energy and insurance services, consolidating its commitment to facilitating the connection between people and supporting customers in daily challenges.

WINDTRE BUSINESS supports companies, professionals and administrations in digital and sustainable transformation, offering telephony services, ultrabroadband connectivity, Data Analytics, Cybersecurity and Cloud solutions.

Much closer, for a more sustainable future

"At Wind Tre, our purpose is to overcome distances between people, since we believe that proximity helps us to create a more sustainable future. We promote ethics, integrity and inclusion and work to ensure reliability, equal access, transparency and a safer digital environment for everyone, including the most vulnerable. We believe in inclusive technology capable of improving people's health, the environment and quality of life. We strive to protect the environment and 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 closeness to our communities".

More Responsibility



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

- **86% of the quantitative performance objectives** associated with the 10 goals of the company's ESG Plan have been achieved. The program continues to be a guide to bring Wind Tre closer to the challenges it has set for 2030
- Bearing witness to the active involvement of the entire management and the various company departments, a **set of indicators linked to the ESG Plan** are a permanent feature of the company's management incentive plan
- **ESG topics**, including the tracking of extreme events due to climate change, are **included in the managed Risk and Internal Control Self-Assessment** of the Risk Management activities and part of the assessment of business continuity and disaster recovery risks
- **100% of the company's registered suppliers** are assessed based on their **adherence to the SA8000** principles, 68% of the company's registered suppliers subject to a dedicated ESG assessment owing to their **partnership Crif Group**, a new sustainable procurement policy has been published
- Sharing programme implemented with an aim to promote sustainability culture within the company Regular sending of the **Sustainability Newsletter** to all Wind Tre people continued

- 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 **conflicts of interest policy**
- Renewed **membership in Transparency International Italia**: the Italian branch of the world's largest anti-corruption group
- Obtained the certification **ISO 20000** (Service Management System) standards and the **UNI Pdr 125:2022** (Gender Equality). **The certificates that making up Wind Tre's Integrated System grew to ten**
- **"NeoConnessi"** the project that supports parents and teachers in education to a safe use of internet reached **more than one and a half million households since 2018**; and in the **2023/2024 school year involved over 21,500 classes of 4th- and 5th-year primary school**. Spread the course **"Digital families today: browsing together safely"**
- In 2024, almost **five million** people and businesses were protected by Wind Tre IT security solutions. In 2024 alone, **Euro 18.5 million were invested in services** and platforms for data and systems security **Cybersecurity was strengthened for the Business market** with solutions dedicated to SMEs, self-assessment tools and active security services
- **Implemented** service continuity initiatives aimed at verifying the resilience of the network and ensuring optimal **service continuity**
- **Overall satisfaction** of WINDTRE customers was **7.7 out of 10**
- Approximately **two million customers** had activated and used at least once **Please Don't Call**, the free service also extended to business customers that provides notifies the customer of potential unwanted calls before answering
- **The company's reputation increased by 1.5 points compared to 2023**, making Wind Tre the company that grew the most compared to the telecommunications sector in Italy
- For the second year in a row, Wind Tre is ranked in the top **1% of companies rated by EcoVadis**, one of the world's largest ESG rating platforms
- **Top Employer Italy 2024 award confirmed for the seventh consecutive year**
- Maintained the relationship established in recent years with the **Consumer Associations**, feeding the contents of the collaboration protocol signed with the main associations on the national scene
- The company is also confirmed in 2024 among the Il Sole 24 Ore and Statista **"Sustainability Leaders"** and among the **"Champions of Sustainability"** listed by La Repubblica and the German Institute for Quality and Finance (ITQF)
- Wind Tre **supports the United Nations Global Compact**, the world's largest strategic corporate citizenship initiative

More Humanity



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

- **103 the municipalities** that had signed up for the **Borghi Connessi** project, created to help small municipalities overcome the digital divide

- The **Connected Villages Academy** has been launched for public administrators, training courses aimed at spreading knowledge on new technologies that help improve the quality of life in small municipalities from an environmental and social point of view
- The **partnerships with *Associazione Borghi più Belli d'Italia*** (Association of Italy's most beautiful villages), ***Associazione Italiana Nomadi Digitali*** (Italian Digital Nomads Association) and the ***Associazione Riabitare l'Italia*** (Reinhabit Italy Association) and collaboration with ASviS for the 2024 Territories Report
- Wind Tre was the **first telecommunications company in the world** to receive an **Equal Salary certification**, subsequently also confirmed for 2024, and received the **UniPdr125 certification**
- **The path of inclusion on LGBTQ+** issues continued with internal communication and awareness-raising activities and Wind Tre's participation in the annual Roma Pride parade
- Continued **support to the 'S.O.S Lei' violence prevention centre** through a **partnership with Fondazione Policlinico Gemelli IRCCS** and the **ASSOLEI association**
- Focus on skills: in 2024 alone, **more than 200,000 training hours** were provided to Wind Tre people
- **A new e-learning course dedicated to Copilot**, the generative artificial intelligence company tool available to Wind Tre people, has been delivered
- **The accessibility index was further improved on the Wind Tre Very mobile, Wind Tre Business websites** and for Wind Tre social media posts; **2 internal courses on digital accessibility** delivered
- **Top Employer Italy for the seventh consecutive year**, with over 90% of the people in the anonymous internal survey declaring that they were proud to be a part of Wind Tre and that they recommended it as a great place to work
- **Employee welfare initiatives** to improve well-being and quality of life, including initiatives to support parenting started
- The new edition of the **New Generation Program** has been launched, a course aimed at newly hired colleagues that sees the **collaboration between Wind Tre and Telethon**
- **33 new graduates** involved in the **OnStage Internship Program**, in which students, supported by Tutors, carry out six-month internships in different company structures

More Green



#Decarbonisation #Smart technologies for the environment

- **Scope 1 and 2 CO₂ emissions were reduced by 38% versus 2020** and confirmed the objective to **bring them to zero by 2030**
- The programme that seeks to **optimise network infrastructure operations** continued, maintaining electrical consumption virtually unchanged, despite the exponential growth in data traffic.
- Initiatives to **improve sustainability in the workplace** were implemented. These included automatic systems for turning the lights on and off, smart sharing of offices and the installation of building automation systems to regulate the use of air treatment equipment based on the outdoor temperature, the installation of building automation systems to regulate the use of air treatment systems, depending on the outside temperature
- At the end of 2024, a third **(35%) of the company fleet were electric or hybrid cars**

- The **new Milan offices at the Monterosa91 complex**, designed in accordance with the highest energy efficiency and sustainability standards
- Maintained the three environmental certifications: **Environmental Management** (ISO 14001), **Energy Management** (ISO 50001) and **Greenhouse Gas Emissions** (ISO 14064-1), which ensure independent certification of the business activities
- **16 new cooperation protocols** were signed bringing the **total number of Italian cities involved in the “Smart City” project to 41**. This project is aimed at supporting the digital and sustainable transformation of Italian cities
- Enriched the portfolio of technological solutions that enable the digital and sustainable development of companies, administrations and municipalities, including **Mass Alerting, Big Data Analytics, IoT solutions, Easy Wi-fly** and **digital boards** for schools
- **Energy Supervisor**: an ICT solution allowing digital management of company and PA energy consumption and spending. In 2024, among others, the system supported two museum sites in the Campania region
- **Support the Florence City Council** in its strategic decisions relating to tourism, transport and communications thanks to the Big Data Analytics solutions
- The **municipality of San Giorgio a Cremano** has been supported in the development of the sustainable urban mobility plan
- **Corporate Partner of Emerging Technology Homes (CTE)**: supporting **Campania Digital Innovation Hub (DIHU)**
- Participated in events and conferences aimed at **promoting the use of innovative technologies** with the aim of stimulating the approach to an increasingly broad and inclusive digital culture
- Guaranteed the **extension of product life cycles** through repair and reuse options offered to consumers and business customers
- The gradual introduction of **Electricity and Gas and Insurance branded furniture elements in the sales network** to avoid the use of paper material and window stickers
- The **use of the 'OTP** (One Time Password) method via SMS for the digital signature of documents and other tools such as the Smart Scanner has been **increased** at WINDTRE stores, leading to a further reduction in paper consumption
- **Giga Green**, the completely free Very Mobile programme that allows Very customers to transform the Giga they consume into a contribution to environmentally sustainable projects such as the implementation of reforestation and beach-cleaning projects in Italy.

THE ESG 2030 PLAN

Based on the key topics identified together with all stakeholders, in 2020, Wind Tre defined an ESG plan to be applied throughout the company. The plan is fully integrated with its business activities. This concrete, measurable plan has been implemented with the participation of all business areas and has led to major achievements ever since its launch in 2021. Once again, in 2024, the plan met the majority of its targets, with positive impacts on various fronts, including the increased ability to create “shared valued” and on its reputation, as shown by the important recognition achieved.

The plan sets out 10 ambitious goals to be reached between 2025 and 2030. Wind Tre has set up a working group to update its sustainability plan, that will be presented over the course of 2025.

THE COMPANY

Who is Wind Tre?

[GRI 2-6]

Wind Tre is a large Italian company, with more than 6,500 employees, which operates in various sectors including **fixed and mobile telecommunications, energy, insurance, cybersecurity and ICT services for business and public administrations**. The company is part of the multinational group **CK Hutchison Holdings Limited**. Wind Tre has a widespread presence throughout Italy.

During 2024, Wind Tre has also **acquired Opnet**, Europe's first operator to have developed a national stand-alone 5G network and to have launched services of fixed access with this technology for the wholesale market in Italy. Opnet provides customers with neutral access to a technologically advanced infrastructure, and the opportunity to take advantage of agreements to access third-party infrastructures currently available in the Wind Tre ecosystem.

The sustainability goals of Wind Tre, which was recognised as a '**Top Employer**' for the seventh consecutive year in 2024, include the well-being and inclusion of its people, the protection of the environment, and the creation of a safer digital environment for all.

WINDTRE, a gold standard for Italian households owing to its multiservice identity

WINDTRE is an Italian brand that offers **connectivity, energy, and insurance products**.¹ The brand is ranked as the top mobile telecom operator in Italy², covering 99.7% of the population with 4G, 97.1% with 5G DSS, and 77% with 5G TDD technology, all thanks to its state-of-the-art infrastructure. It is a point of reference for families who demand reliable, affordable, and transparent products and services, with widespread consultancy and support available through the **hundreds of WINDTRE Stores** present throughout Italy. In 2022, the electricity and gas offer for Italian households was launched, and in 2023 the product portfolio expanded to include insurance coverage to protect the home and family. With the expansion of its offer, WINDTRE consolidates the company's commitment to facilitate connections between people, and to help customers to face the daily challenges.

WINDTRE BUSINESS for businesses, professionals and public administrations

The WINDTRE BUSINESS is the brand division that supports businesses, 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, solutions for data analytics, cybersecurity, and cloud solutions with next-generation data centres. It also has a large number of partnerships with companies in the ICT sector.

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 been top in number of personal SIM cards (total SIM cards minus SIM cards enabled only for machine-to-machine communication) for 30 consecutive quarters [source: AGCOM Observatory 4-2024].

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. At Wind Tre, we are aware of the importance of having a network of individuals and are committed to cultivating and improving relations with each of the stakeholders with whom we interact through our various initiatives and projects.

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.

Values and behaviours of the Wind Tre's citizenship model

RESPONSIBILITY

Implementing with drive and energy

Improving accountability

TRUST

Trusting and Entrusting

Cultivating relationships

COURAGE

Experiment by creating value

Decision-making in times of uncertainty

INCLUSION

Generating participation

Learning from differences

A modern and wide-reaching network

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

The Wind Tre mobile network is a modern infrastructure, consisting of approximately 20,000 plants, - with the addition of 5,000 new plants in 2024 following the acquisition of Opnet - which are capable of offering 2G, 3G, 4G, 5G and NBIoT (*Narrowband Internet of Things*) services throughout Italy.

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.

At the end of 2024, Wind Tre's 5G network provided coverage to more than 97% of the population, with a state-of-the-art infrastructure and top performance even when a large number of users are online at the same time and in highly congested locations.

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

Overall, 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 97.1% for 5G FDD DSS and 77.0% for 5G³ TDD.

As mentioned above, in 2024, Wind Tre completed the acquisition of Opnet, Europe's first operator to have developed a national stand-alone 5G network and to have launched services with this technology for the wholesale market in Italy.

The acquisition of Opnet will allow Wind Tre to offer even more reliable 5G and FWA (Fixed Wireless Access) services, and to develop even more innovative technological solutions for the digitalisation of businesses and public administrations.

Telco and beyond

WINDTRE LUCE&GAS powered by Acea Energia

With the nationwide 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 whole of Italy, 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 call the dedicated number 159 as a further channel for contracting electricity and gas products.

As certified by Acea, the supply provides for electricity with a certified Guarantee of Origin: an electronic certification attesting to the renewable origin of the sources used for the production of electricity, in compliance with the regulations established by ARERA Resolution ARG/elt/104/11, as amended. The CO₂ emissions of the gas supplied is offset by the purchase of certified carbon credits with an aim to fund and support mitigation projects that have concrete benefits for local communities⁴.

Since all WINDTRE LUCE&GAS offers have the electronic billing service included, practically all customers received their bills in digital format in 2024, helping to reduce paper waste and the CO₂ emissions associated with printing and delivery.

In addition, the programme launched for the consumer market was ongoing, through the convergence of services with a further benefit provided to customers, offering fixed and mobile telephony as well as electricity

³ You must have authorised provision and a 5G device to browse online in 5G.

⁴ <https://www.windtre.it/luce-gas/sostenibilita>

and/or gas. These benefits have also been extended to the microbusiness scope. There are plans in the near future for WINDTRE LUCE&GAS to continue to expand its convergence services with a view to integrating new Wind Tre businesses, with a commitment to increase brand awareness and customer loyalty.

WINDTRE Assicurazioni insurance services

WindTre has been operating in the insurance sector as a multifirm insurance agency since September 2023.

The business model is based on a strategic partnership with Wefox, a leading company in Europe, which – through its innovative and modular technology platform – allows more than 700 authorised WINDTRE stores with staff trained and authorised to sell insurance, to set up fully digital insurance policies in the store quickly and easily, without wasting paper. Furthermore, since 2024, policies for private individuals can be purchased not only at WINDTRE stores but also over the phone, on the website or on the WINDTRE app.

The insurance products distributed by Wind Tre have been created specifically for WINDTRE clients by Net Insurance S.p.A., Inter Partner Assistance S.A., Rappresentanza Generale per l'Italia IMA Italia Assistance S.p.A., T.U. brand. Europa SA, which operates in Italy under the HDI Embedded brand and Groupama Assicurazioni S.p.A..

Most of the insurance products distributed have an annual duration with splitting and monthly payment of the premium at no cost to the end customer and a set rate that include, a dedicated range of policies for **family and home insurance**; a policy insuring the **repair of household appliances** against breakdowns and malfunctions; one product **“Travel and Holidays”**, to insure all the trips that customers take in Italy and Europe; a dedicated range of **policies for customers practising amateur sports**; a policy covering veterinary expenses for dogs and cats **“Micio e Fido”** and lastly, a temporary policy designed for trips around the world of up to 60 days, **“Viaggi Mondo”**, for health expenses abroad and to protect against other unforeseen events.

In November 2024, insurance solutions were also launched for small and medium enterprise. These policies (Groupama Assicurazioni S.p.A. **Protezione Pro**) are packages designed for the needs of owners and tenants of commercial premises, which provide a basic policy, and products created based on the needs of specific targets.

Opnet, Wholesale Company Wind Tre

Opnet is the Wholesale Company Wind Tre, established following its acquisition by Wind Tre in August 2024.

Partner of TLC operators and companies in related sectors, such as Multi-utilities, Insurance firms and Large-Scale Retail, Opnet provides wholesale solutions to provide connectivity services.

Opnet and Wind Tre are already on their way to integration. This will result in the creation of a unique gold standard on the market, representing the shared identity of two companies, designed to respond even more effectively to the diverse requirements of the wholesale market.

The range of products includes wholesale solutions for mobile and fixed services, for both wired and wireless networks, MVNO, IoT connectivity and dedicated fibre and microwave connections. The proposal will also evolve focusing on advanced models such as Network-as-a-Service and the development of API, with an aim to optimise the provisioning processes and simplify operations management for clients.

Opnet is founded on distinctive values such as Innovation, Professional Expertise, Adaptability and Client Focus and offers its services as a baseline partner for enabling responsible digital progress. Through advanced connections, the company supports the growth and development of communities and areas served by its clients to become a point of reference on the wholesale market, leading industry innovation with increasingly secure and reliable solutions, capable of supporting the growth ambitions of its clients.

The corporate structure

[GRI 2-1, GRI 2-2, GRI 2-4, GRI 2-9, GRI 2-10, GRI 2-11]

Wind Tre S.p.A. (“Wind Tre”) 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. Wind Tre is a wholly owned subsidiary of Wind Tre Italia S.p.A., which in turn is a wholly owned subsidiary of CK Hutchison Group Telecom Italy Investments S.à r.l. Hereinafter “Wind Tre Group” means Wind Tre Italia S.p.A. and directly and indirectly wholly owned subsidiaries⁵.

Wind Tre is part of the CK Hutchison Holdings Limited (CKHH) Group, 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.

In 2024, Wind Tre’s head office was transferred to Milan, at in Via Monte Rosa 91, 20149, the beating heart of the administrative, financial and technological activities of the Wind Tre Group, which also includes Wind Tre Italia S.p.A., Wind Tre Retail s.r.l. and 3Lettronica Industriale S.p.A. The company has also had premises at Via Cesare Giulio Viola 48, Rome, for many years where its legal, compliance, sales, regulatory and institutional activities are based.

Since January 2023, Wind Tre and Iliad S.p.A., have each held a 50% stake in the joint venture, Zefiro Net S.r.l.. The purpose of Zefiro Net is to design, develop, construct, install, maintain and manage electronic communication networks and technological infrastructures and to design, develop and maintain software, selling wholesale products connected and linked 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.

Since April 2023, Wind Tre has held 70% of the shares in RAD S.r.l., whereas 30% is held by IG Investment Group S.r.l.. RAD operates in the field of cybersecurity and was acquired with an aim to ensure the integration of the services provided by RAD in the Wind Tre value proposition.

On 01 August 2024, Wind Tre also purchased 100% of Opnet S.r.l., which, following an initial period of integration, it is Wind Tre’s wholesale company, specialising in solutions for TLC operators and related sectors, such as multi-utilities, insurance, banks and large-scale retail.

Listed below are the Wind Tre Group companies included in the sustainability reporting:

Wind Tre Italia S.p.A. wholly owned subsidiaries as at 31.12.2024 subject to reporting.	Company registered office	Percentage of share capital held by Wind Tre
Wind Tre S.p.A.	Italy	100%
3Lettronica Industriale S.p.A.	Italy	100%
Wind Tre Retail S.r.l.	Italy	100%
Opnet S.r.l.	Italy	100%
CKHH MSK 22 s.r.l. (Terminated 19.12.24)	Italy	100%
Wind Tre Luce e Gas S.r.l.	Italy	100%

The Wind Tre Group has local offices distributed throughout Italy, which allow the company to maintain a stable presence nationwide.

⁵ The reporting scope of this document refers to Wind Tre Italia S.p.A and its wholly owned subsidiaries.

Wind Tre Group is a leading Italian provider of fixed and mobile telecommunications, 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 has a field of action which extends to the whole of Europe. Wind Tre Group also provides energy, insurance and cybersecurity services.

Board of Directors

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. Wind Tre Group's governance structure is made up of the Board of Directors, and where appointed, the Board of Statutory 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 normally remain 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 Wind Tre Group Board of Directors 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.

In 2024, the Wind Tre Group companies include special clauses into their Articles of Association in order to expressly allow the meetings of the corporate bodies to be held exclusively or partly by teleconference.

In March 2024, Wind Tre's Board of Directors has set up a Sustainability Committee, the members of which are Directors and members of the management team. In 2024, the Sustainability Committee met once, on 11 December.

The Wind Tre Board of Directors, which was appointed on 31 March 2022 for three financial years, is made up of seven directors, of which six are men and one is a woman. The term of the Board of Directors will end on the date of the next Shareholders' Meeting, called to approve the financial statements for FY 2024.

The Chairperson of the Board of Directors is vested with the powers provided for by law and by Wind Tre's articles of association. There are two co-CEOs, both of whom are executive directors on the Wind Tre Board of Directors.

Members of the Board of Directors

The members of the Board of Directors of Wind Tre S.p.A. as appointed by the shareholders' meeting on the 31 March 2022 are as follows:

Fok Kin Ning Canning (Chairperson 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).

Among the members of the Board of Directors, in addition to the Co-Chief Executive Officers with equivalent powers, Gianluca Corti and Benoit Hanssen, there is also the Chief Financial Officer, Stefano Invernizzi.

As well as holding the executive roles for their positions, the two co-CEOs have similar roles in Wind Tre Group's wholly-owned subsidiaries, except in the cases of: (i) Wind Tre Retail S.r.l., where Gianluca Corti Chairperson of the Board of Directors and co-CEO and Benoit Hanssen is co-CEO; (ii) CKHH MSK 22 S.r.l.⁶, where

⁶ Ceased on December 19, 2024

the Board of Directors was made up of Benoit Hanssen, Chairperson of the Board of Directors, and Stefano Invernizzi, Director; (iii) Wind Tre Luce e Gas S.r.l., where Gianluca Corti is Chairperson of the Board of Directors and co-CEO and Benoit Hanssen is co-CEO; and (iv) Opnet S.r.l., where Benoit Hanssen is Chairperson of the Board of Directors and Gianluca Corti and Stefano Invernizzi Non-Executive Directors.

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 Wind Tre Group and CKHH's corporate governance guidelines and rules, which take into account – among other things – the experience, integrity, and professionalism of potential members (see: https://www.ckh.com.hk/en/about/cg_policies.php).

Functions of the Board of Directors

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 Group.

From this perspective, Wind Tre remains constantly committed to maintaining high standards of corporate governance suitable for the needs and interests of the company and Wind Tre Group, in line with the high standards set by the parent company CKHH. The aim of this is to ensure effective corporate governance practices, which are considered essential for increasing value for shareholders, and for safeguarding their interests and those of the other stakeholders. In full accordance with the current legal provisions and the Corporate Governance policies of the group to which it belongs, the Company adopts solid corporate governance principles, which emphasise a high-quality Board of Directors and effective internal controls, based on ethical and responsible corporate culture.

In addition, there is a Board of Statutory Auditors, composed of three statutory and two alternate auditors, and which acts as the internal control body of the major Wind Tre Group companies. Its members are: Marcello Romano – Chairperson of the Board of Auditors, Roberto Colussi – Statutory Auditor, Luca Occhetta – Statutory Auditor, Fabio Carusi – Alternate Auditor, and Giuseppe Tarantino – Alternate 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 – Head of External Affairs & Sustainability, Rossella Gangi – Head of Human Resources, Stefano Invernizzi – Chief Financial Officer, Carlo Melis – Head of Technology, Mirko Rugarli – Head of Transformation & Automation, 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.

Part of the CK Hutchison Group

CK Hutchison Holdings Limited (CKHH) is a multinational group that has always operated in the field of innovation and technology that employs more than 300,000 people in over 50 countries around the world. The group operates in four core business areas: ports and related services, retail, infrastructure, and telecommunications.

CK Hutchison is a global leader in the telecommunications field, with more than 150 million customers. The Group companies operating in this field, including Wind Tre, are governed by CK Hutchison Group Telecom

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

The CK Hutchison Sustainability Framework

Given the size of the Group and the extent and complexity of its operations, CKHH faces numerous sustainability challenges. It prioritises these commitments through ongoing stakeholder engagement.

The Group has established a structured governance model for structured sustainability, with a Sustainability Committee at Board of Directors 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).

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**

Between August and December 2024, CKHGT started a double materiality assessment in preparation for compliance with the Corporate Sustainability Reporting Directive (CSRD), the recent directive that governs sustainability reporting, which will also be applicable to Wind Tre from the data relating to FY 2025 onwards.

Wind Tre is the largest operator in the CKHGT telecommunications division. It is helping to compile the CKHGT and CKHH Sustainability Statement 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.

In October 2024, the 3rd CKHGT SUSTAINABILITY FORUM was held in Vienna. The meeting involved the sustainability teams of the group's telecommunications companies. The teams were divided into working groups and with the guidance of two functional coaches, endeavoured to prioritise the various challenges that the companies are facing in the short and long term, in a collaborative and synergistic environment.

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 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 “Risk Management and Internal Control Assessment Declaration”).

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

At the end of 2024, risk indicators had been identified for 35 business processes. 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 for 20 of the business processes.

Awards and acknowledgements received in 2024

Wind Tre received several acknowledgements in 2024, the main ones of which are described below:

Top Employer Italy 2024

For the seventh year in a row, Wind Tre was among the companies to be certified as Top Employer Italia 2024. The Top Employers certification is an official recognition of corporate excellence in HR policies and strategies, and their implementation towards the improvement of staff well-being and a better working environment. It is awarded to companies that meet the high standards required by the HR Best Practices Survey. The Survey covers six macro areas in the field of HR, with an in-depth review and analysis of 20 different topics and the respective Best Practices, including People Strategy, Work Environment, Talent Acquisition, Learning, Diversity, Equity & Inclusion, and Well-being.

Sustainability Leader

Wind Tre was recognised as a “2024 Sustainability Leader” in Il Sole 24 Ore and Statista. For the second consecutive year, the company entered the ranks of the 200 most sustainable large Italian companies following research evaluating around 1,900 companies based in Italy in accordance with 40 indicators relating to three pillars of sustainability.

Equal Salary Certification

In 2024, Wind Tre was again certified 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 a rigorous methodology developed in collaboration with the University of Geneva and entailed the involvement of PwC in audits which is then periodically repeated in the subsequent years. 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.

Italy Best Employer

In 2024, for the fifth consecutive year, Wind Tre was recognised and certified as Italy's Best Employer out of the top 450 employers most valued and recommended by Italian workers as the most desirable places to work. The company was assessed for the certification using the social listening methodology and awarded by Statista and Corriere della Sera's "*Buone Notizie*". The survey was conducted independently on a sample of 20,000 workers responding on a voluntary basis to identify Italian companies with the highest level of employee satisfaction. The company's main strength is focus on its people's well-being, in terms of work-life balance, commitment to training and continual growth, and its inclusive culture.

Diversity Leaders

For the fifth year in a row, Wind Tre was recognised as one of the European Diversity Leaders by the Financial Times and Statista. The award celebrates companies who prove their tangible commitment to diversity and inclusion. There were 850 European companies in the rank, just 28 of which were Italian, identified based on a survey that involved more than 100,000 employees and extensive research into D&I.

Top Job - Second in the Telecommunications category

Wind Tre has been recognised among the large Italian companies most focused on people's needs, attaining the position of second place in the Telecommunications category of the TOP JOB rating, as part of the "Top Job - Italy Best Employers" study, prepared by the German Quality and Finance Institute (*Istituto Tedesco di Qualità e Finanza*). The independent study investigated the quality of jobs in Italy in 500 companies in 37 different sectors, among the main areas assessed were working environment, personal development and sustainability.

Silver PRize

Wind Tre was awarded the silver PRize, the Italian Prize for Public Relations, sponsored by UNA (*Aziende della Comunicazione Unite*) in the "Environmental and Sustainability" category, for *NeoConnessi*, Wind Tre's digital and media education project, which is dedicated to supporting schools and families during the delicate stage when children begin using the Internet on their own for the first time.

New Player - MF INSURANCE AWARDS 2024

Wind Tre was awarded the 'Special New Player Award' at the MF INSURANCE AWARDS 2024, an event organised by MF Milano Finanza Group Class Editori, for the new business model integrated with insurance business. Following connectivity and energy, the brand extended its services to provide insurance products. This evolution adds a practical element to the company purpose with increasing commitment to bringing people closer together.

Champions of Sustainability

In 2024, Wind Tre once again took one of the top spots 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 and published by Repubblica Affari&Finanza.

Much closer, for a more sustainable future

MANIFESTO

“At Wind Tre, our purpose is to overcome distances between people, since we believe that proximity helps us to create a more sustainable future. We promote ethics, integrity and inclusion and work to ensure reliability, equal access, transparency and a safer digital environment for everyone, including the most vulnerable. We believe in inclusive technology capable of improving people’s health, the environment and quality of life. We strive to protect the environment and 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 closeness to our communities”.

Wind Tre and the goals of the global agenda

Through 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 UN’s **2030 Agenda for Sustainable Development Goals** (SDGs). The 17 SDGs, divided into 169 targets, make up the universal action plan for “people, planet and prosperity”. They are universal, interconnected, and indivisible goals: they must take specific territorial realities into account, and are potentially applicable everywhere, at global, national, regional, local and urban levels. A key principle is: **No one left behind**.

Among its main principles, Wind Tre includes support for the achievement of the goals non the 2030 Agenda, with a particular focus on Goal 4 (quality education), 5 (gender equality), 7 (clean and accessible energy), 8 (decent work and economic growth), 9 (companies, innovation and infrastructure), 11 (sustainable cities and communities) and 13 (combat climate change). As described below, the company has also based some of the objectives in its own “2030 ESG Plan” on these goals.

Wind Tre has set itself the objective of promoting ethics and integrity in every aspect of its activity. Based on the key topics identified together with its stakeholders and on its DNA, the company has set itself the objective of working to ensure reliability, equal access, transparency and a safer digital environment for everyone, including the most vulnerable. In addition, Wind Tre intends to actively contribute to protecting the environment, involving its customers and suppliers in doing the same. From this perspective, the company works to ensure inclusion and provide the community and institutions with digitalisation, innovation and skills, seeking to enable a fair and environmentally friendly transition and ensure its closeness with every area of the country.

Wind Tre supports the Global Compact

As confirmation of the company’s commitment to creating a more sustainable future, **Wind Tre supports the United Nation’s Global Compact**, the world’s largest corporate citizenship initiative, bringing together more than 25,000 companies in approximately 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, since 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. 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.

At the beginning of 2025 Wind Tre took part in a working group to draft a 2025 Position Paper led by the UN Global Compact Network Italy regarding “Digital transition to support business sustainability: risks and opportunities”, the result of which will be discussed during the CEO Meeting, to be organised over the course of the year.

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

ESG MODEL

Wind Tre’s existence brings people closer together. Based on this purpose, and the two relative enabling factors - its telecommunications network and its 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 are not only responsible for obeying 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 Wind Tre has adopted a governance model designed to guarantee the utmost fairness for customers and partners alike, and introducing sustainability priorities into its business activities, with the involvement of its supply chain. 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, for its own customers and 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, businesses and public administrations 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 environmentally sustainable, by reducing its emissions and working towards using resources more efficiently. Wind Tre also supports the concept of the Twin Transition (environmental and digital transition), investing in 5G and in the digital technologies required to make cities and communities more and more sustainable.

STAKEHOLDERS AND RELEVANT TOPICS

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

Wind Tre maintains regular dialogue and 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 Statement and developing the integrated management system.

The table below shows the list of Wind Tre stakeholders.

STAKEHOLDER TABLE

- **Shareholders and bondholders:**
 - CK Hutchison Ltd and its management
 - CKHGT and its subsidiaries
 - CKHIOD
- **Customers, public administration, and associations:**
 - Consumer and business customers
 - Public administration
 - Consumer associations
- **The community:**
 - Italian municipalities
 - Italian villages
 - Tertiary sector (non-profits, NGOs – including those of social utility – etc.)
 - Universities and research institutes
 - Media and opinion leaders
- **Institutions:**
 - Regulatory bodies (authorities, privacy bodies, antitrust bodies, etc.)
 - National and local government bodies (MIMIT, local bodies, etc.)
 - Italian judicial bodies and public prosecutors
 - Law enforcement bodies (police)
- **Wind Tre personnel:**
 - Employees
 - External consultants
 - Trade union representatives and organisations
- **Suppliers and commercial partners:**
 - Suppliers of goods, products, and services
 - Subcontractors
 - Direct and indirect sales network
- **Financial community:**
 - Banks
 - Institutional and private investors

Between August and December 2024, Wind Tre participated in the double materiality assessment initiated globally by the parent company CKHGT in preparation for the new sustainability reporting defined by the Corporate Sustainability Reporting Directive (CSRD).

The work was completed in association with all the CKHGT telecommunications subsidiaries:

- i. Hutchison Drei Austria GmbH (Three Austria)
- ii. H3G Denmark ApS (Three Denmark)
- iii. Three Ireland (Hutchison) Limited (Three Ireland)
- iv. H3G Access AB (Three Sweden)
- v. Wind Tre S.p.A. (Wind Tre)
- vi. Hutchison 3G UK Limited
- vii. Hutchison Telecommunications Lanka Limited
- viii. Hutchison Telecommunications Hong Kong Holdings Limited
- ix. Vietnamobile Telecommunications Joint Stock Company

For each material topic that emerged during the assessment performed, the relevant functions of each group company have been involved to represent the needs of the various groups of stakeholders involved in preceding listening activities.

The update of the material topics initiated by the parent company began with the identification of a list of potential material topics in the Sustainability Statements of the group companies, those of their most important competitors globally and the companies operating in the telecommunications industry, also analysing the industry standards (SASB Standards) and those specific to the telecommunications market (GSMA) and on certain ESG platforms.

Each of the topic identified has been categorised within one of the ESRS (European Sustainability Reporting Standards) standards required by the directive, and then analysed for impacts, risks and opportunities (IRO), and then submitted to the stakeholders of the group companies (including Wind Tre) through eleven workshops (one for each ESRS standard).

On completion of the workshops and having gathered the assessments on the impacts, risks and opportunities of each topic analysed, a double materiality assessment was produced, which will be applied based on the 2025 data.

Wind Tre found that almost all of the material topics identified at the end of 2021, which are still the basis of the corporate narrative, were included in the work shared with the parent company.

The analysis, which started at the end of 2021 and was described in the preceding sustainability statements, led to the identification of seven key topics, on which the corporate narrative and corporate sustainability programmes were based until 2024, arranging the topics based on the impacts perceived as priorities for the company.

This process was also an opportunity to reaffirm the importance of Wind Tre's two fundamental enabling factors – its telecommunications network and the network of people who 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 of its activities.

Finally, by combining 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 ten objectives to be achieved between 2024 and 2030: 10 challenging goals to eliminate any distance between people.

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	Positive, Actual	Implement measures to allow children to use the internet safely and responsibly, increase digital literacy, awareness and trust, leading to the development of knowledge and skills and greater safety.	ESG plan – Goal 1 ‘Families 100% aware and protected’
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.		Negative, Potential	The failure to implement adequate cybersecurity policies in telecommunications operations may lead to data violations, identity theft, and other negative impacts on people (such as customers and employees), potentially damaging their financial security and livelihood.	ESG plan – Goal 2 ‘Companies 100% secure’

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	Positive, Actual	Implementing digital inclusion measures (connectivity in rural communities) may improve customer access to benefits such as economic development, educational and social benefits, and better access to government services (e.g., the Italian Public Digital Identity System (SPID)).	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’
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.		Positive, Actual	Providing learning and development opportunities to satisfy mutual needs of the workforce (e.g., digital mindset programmes) increases employee trust, occupational health and safety, and can contribute to personal development.	ESG plan – Goal 4 ‘100% future-ready people’
Inclusion of people with a 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		Negative, Actual	Progress for people with disabilities defined in connection with the SDGs are zero or insufficient in many cases.	ESG plan – Goal 5 “Digital accessibility for people with disabilities”
		Positive, Actual	Wind Tre has enhanced its own communication channels using tools which facilitate the	

their needs. Making our digital channels accessible to everyone.			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	Negative, Actual	Scope 1 and 2 greenhouse gas emissions associated with company's telecommunications activities and operations contributes to climate change, negatively impacting the environment and personal safety (owing to extreme weather events, rising sea levels, droughts, etc.)."	ESG plan – Goal 9 '100% carbon neutral'
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.		Positive, Actual	Promoting a culture of strategic innovation and offering innovative products and services (such as IoT applications for energy saving and efficiency, connectivity solutions for people, etc.) allows the creation of more sustainable products and services, helping customers to improve their conditions and contributing to the decarbonisation of the economy.	ESG plan – Goal 8 'Smart partner of 100 smart cities'

THE ESG 2030 PLAN

Wind Tre's ESG Plan is a concrete, measurable programme, developed with the participation of all business areas. It provides for a structured governance system with indicators and targets monitored quarterly. The plan includes ten objectives capable of mitigating the negative impacts and boosting the positive ones. Once again, in 2024, most of the plan's objectives were achieved, 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. The majority of the current ESG Plan goals will come to an end by the end of 2025 but the company has already launched work to update the Plan owing to the results of the double materiality assessment, performed together with the CKHGT group companies, as described in the pages above.

GOAL 10 – 100% closer

Goal 10 of Wind Tre's ESG plan is '100% closer' and aims to implement 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 NGOs and active participation in solidarity initiatives with the involvement of Wind Tre personnel.

Goal 10 is the common theme of all the other Goals in the ESG Plan, encompassing the vision that drives the company to tackle the sustainability topics.

THE SUSTAINABILITY GOVERNANCE MODEL

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

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 2024, Wind Tre adopted an ESG policy that 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. It also plans to issue an environmental policy in the first months of 2025.

The individuals responsible for the implementation of the ESG plan were designated by the Management Team⁷. They are known as **Sustainability Ambassadors and consist of Wind Tre managers working in various company areas** and 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.

⁷ 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.

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 Chairperson of the Board of Directors and the Shareholder through regular updates.

Lastly, in 2024, Wind Tre's Board of Directors set up a Sustainability Committee, the members of which are Directors and members of the management team, which met once at the end of the year.

In 2024, almost all of the KPIs analysed for the achievement of the ESG goals have reached the targets set for the year.

In addition, since 2022, sustainability indicators linked to the ten goals 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 makes up 15% of the total of the managerial incentive plans.

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.

Since 2024, the onboarding process for Wind Tre new hires, "Living W3" involves targeted meetings with the Sustainability Team to present the new colleagues with the sustainability strategy and corporate ESG Plan.

During the meetings, as for the On the Same Page project, the reasons for which the company is addressing sustainability and the main results achieved to date.

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. The brochure is published on the company site and is a tool available to both employees and any other person from outside the company.

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



70%

Percentage of managers in Italy that states that his or her company provides for activities designed to promote ethical behaviour

(EY Global Integrity Report 2024)

68%

Percentage of Italians for whom sustainability is a topic close to their hearts (+20% on 2015)

(LifeGate, 2024)

69%

Percentage of listed Italian company boards of directors that have an internal committee dedicated solely to the issue of sustainability

(Deloitte, 2024)

According to the EY Global Integrity Report 2024⁸, - a survey that involved more than 5000 board members, managers and professionals in more than 50 countries, including Italy – the Italian companies consider corporate ethics and integrity as a business priority: 70% of managers in the country declares that their company provides for activities designed to promote ethical behaviour.

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. 93%⁹ of Italians prefer to buy from companies that proven to have implemented ethical sourcing strategies, highlighting a growing awareness of sustainable practices, and 23% are willing to pay a higher price for sustainable goods or services¹⁰. LifeGate also recorded that as many as 68% of Italians believe that sustainability is a heartfelt issue, with an increase of 20% compared to 2015.

⁸EY Global Integrity Report 2024- https://www.ey.com/it_it/newsroom/2024/06/ey-global-integrity-report-2024

⁹ OpenText: Ethical Supply Chain, 2021

¹⁰ LifeGate 10th national observatory on sustainable lifestyle, 2024

In addition, the ‘reporting revolution’ currently facing the world of business¹¹ should not be merely an exercise in compliance but a way of acquiring an essential view of risk exposure and long-term prospects for the benefit of investors and management alike¹². It is no coincidence that the corporate governing bodies are placing an ever-increasing focus on sustainability matters. At the end of 2023, **the percentage of companies that attributed responsibility to an internal Board committee increased to 69%**, against 60% in 2021, whereas the **number of companies that chose to appoint at least one board member with expertise relating to climate change and sustainability doubled**, from 18% in 2022 to 41%¹³.

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
- Ensuring adequate oversight of relevant social and environmental topics with the involvement of the top management and all corporate areas
- 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 established in the **Code of Conduct**, and the regulations defined in numerous other group policies, in order to bolster the company's credibility and reputation within the context in which it operates.

For each of the subsidiaries, Wind Tre has adopted an **Organisation, Management and Control Model pursuant to Italian Legislative Decree no. 231/01**, which indicates the rules and control measures suitable for preventing predicate 231 offence, 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.

Supervisory Body

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,

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 Deloitte - Update of the TCFD Recommendations in listed Italian companies 2023, 2024

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 2024 reporting period, the supervisory bodies periodically report on their work to both the Board of Directors and the Board of Auditors.

Code of Conduct

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).

Policies and procedures

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** which have been approved by the Wind Tre S.p.A. Management Team¹⁴ 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.

With regard to **human rights**, Wind Tre is inspired by the principles laid out in the policies of the CK Hutchison Holdings Limited Group¹⁵, the principles contained in the fundamental conventions of the ILO (International

¹⁴ 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

¹⁵ 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.

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 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. To achieve these objectives, taking care to ensure that they are widely disseminated, the Regulatory Affairs Department periodically organizes both specific courses aimed at managers whose activities may generate potential antitrust risks, and courses intended for the entire corporate population, and antitrust risk assessments with related gap analysis, and reports intended to keep CEOs updated. In addition, the Regulatory Affairs Department is responsible for updating Wind Tre's Antitrust Program.

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 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.

Artificial Intelligence: AI Act and Wind Tre Policy

In line with the principles and rules enshrined in Regulation (EU) 2024/1689 on Artificial Intelligence, also known as the "AI Act", the Wind Tre Group has decided to adopt an Artificial Intelligence Policy to regulate the behaviours to be adopted and those not to be adopted in order to limit the risks deriving from the use of Artificial Intelligence systems by itself or by third parties. For the effective implementation of the Policy and its principles, an AI Governance Committee has been established, responsible for the E2E governance of the process of procurement, implementation, marketing and use of AI itself. Wind Tre monitors regulatory updates on this matter, evaluating, if necessary, updates to its policies and procedures.

Supervisory activities

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

Audits and remediation activity

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.

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 Code¹⁶.

Furthermore, 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 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.

Anti-Fraud, Bribery and Corruption Policy

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 must observe in order to prevent and combat fraud and corruption and to ensure compliance with the current regulations.

Wind Tre has moreover established a **Due Diligence procedure for its business partners**, which, using a “Risk Based” approach, must be applied to any third parties deemed to be at greater risk of non-compliance with the anti-corruption legislation, prior to the establishment of a new business relationship, or the extension or renewal of an existing relationship. For example, suppliers in the procurement area, consultants, and business sales agents are subject to due diligence procedures. **261 due diligence procedures were carried out in 2024.**

At the same time, Wind Tre established a **Donations, Sponsorships and Membership Fees Procedure** and a **Gifts and Hospitality Procedure**, which determine methods according to which these initiatives are managed. In 2024, in-depth preliminary analyses were conducted on all donations, sponsorships and membership fees paid during the year, specifically: four donations, nineteen sponsorships, four community projects¹⁷, and

¹⁶ 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.

¹⁷ Community projects are the projects/initiatives whose aims include the creation of benefits for the community.

eleven membership fees aimed at improving Wind Tre's reputation, image and presence 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 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:

- (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 Organizational Models; offences affecting areas protected by the EU (prevention of money laundering, product safety and compliance, etc.), violations of antitrust regulations, etc..
- (ii) **Other violations relating to 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 **reporting 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.

Our ESG goals

Goal	Horizon	Ambition	Courses of action	The point we're at
Sustainable supply chain	2025	To further integrate environmental, social, and governance factors into procurement and decision-making processes	<ul style="list-style-type: none"> • Use of a special ESG assessment platform for the continuous evaluation of the sustainability level of the supply chain • Monitoring of improvement measures • ESG parameters integrated in the qualification scores and criteria for entering the tender • Consistency of the rules of engagement and control of suppliers with the energy efficiency plan and the corporate decarbonisation plan 	<ul style="list-style-type: none"> • 100% of registered suppliers with active qualification assessed on the basis of environmental and social criteria • 68% of registered suppliers subject to assessment through the ESG platform

Sustainability in the supply chain

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

Knowing the company's supply chain is the first step in establishing a corporate sustainability strategy, which is one of the reasons why **one of the ten goals of Wind Tre's ESG plan** is to work towards making its **SUPPLY CHAIN SUSTAINABLE** and integrating environmental, social, and governance factors into procurement processes and business decisions. **100%** of the company's registered suppliers with active qualification are evaluated on the basis of **environmental and social criteria** based on **adherence to the SA8000 principles**. In July 2022, Wind Tre decided to join the **CRIF Group** to gain support in the sustainable transformation process through the use of a **global digital platform**¹⁸ capable of checking and monitoring the sustainability level of suppliers.

At the end of 2024, 67.9% of registered suppliers (with active qualification or on the Whitelist¹⁹) were assessed through CRIF Group's SynESGy Platform. The process requires suppliers who are invited to log on to 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. The assessment allows suppliers to be attributed with **One Summary Score and five Specific Scores** (Business / Environmental / Social / Governance / Industry).

Each supplier is asked to answer the questionnaire again twelve months after the previous one 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 also developed. This was well-received based on the number of registrations. **The ESG summary score and the Environmental Score are integrated into qualification scores in the Supplier Register and become assessment elements for the selection of suppliers and the awarding of tenders.**

At the end of 2024, there were 647 suppliers in the register. To obtain the total size of the supply chain, are certain particular categories that are not qualified in the register are added to these suppliers +, including domestic and international telecommunications operators (e.g., for "roaming" costs), rentals (e.g. relating to the telecommunications network) and the distribution chain. Taking into consideration of all these further categories, brings the total to 1,849 suppliers²⁰, 92% of which are in Europe.

¹⁸ 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, and Environmental Sustainability).

¹⁹ Whitelist suppliers are not subject to qualification but are nevertheless monitored by the supplier register.

²⁰ This includes Wind Tre suppliers with orders in 2024 >€1000 and suppliers of wholly owned subsidiaries.

GEOGRAPHICAL DISTRIBUTION (total Wind Tre suppliers)

Canada	4
Europe	1,694
China	63
UK	15
Hong Kong	6
Total Suppliers	1,849

Wind Tre Procurement Department began an extended ESG performance analysis and supplier monitoring activity, identifying a selection of potential supplier sustainability improvement monitors and involving them in ad hoc meetings dedicated to ESG topics.

All the activities managed by the Procurement Department regarding registered suppliers are described in the **Sustainable Procurement Policy**, which was published at the end of 2024 on the Wind Tre Group corporate website.

This document, which is referenced in the supply contracts managed by Procurement, outlines Wind Tre's expectations of its qualified Suppliers for the sustainable and competitive management of its **supply chain**. It ensures that the Suppliers, their Subcontractors, and subsidiaries align with Wind Tre's values regarding labour standards, health and safety, environmental protection, and business ethics.

As part of the SA8000 management system, Wind Tre performed a series of audits at the premises of a selection of suppliers in 2024.

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 grand majority of Wind Tre registered suppliers are based in Italy. The very limited number of cases of disputes testifies to Wind Tre's good relations with its suppliers.

Disputes with suppliers (no.)	2024	2023	2022	2021	2020	2019
Number of disputes with suppliers	1	2	2	3	4	5

Supplier Register	2024	2023	2022	2021	2020
Total suppliers (no.)	647	644	603	631	891
Suppliers located in Italy (no.)	609	604	561	592	827
Amount ordered (in millions of €)	1047	1,242	1,421	2,187	1,830

The integrated management system

Wind Tre adopts an **Integrated Management System**, which involves all the business functions in the central spheres of company life. The aim is to ensure product and service quality, protection of the environment and the workers, social responsibility, gender equality and information security, guiding and monitoring performance levels by applying the Total Quality Management principle of continuous improvement.

In 2024, Wind Tre gained two new certifications:

- **ISO 20000-1:2018** (Service Management System)
- **UNI Pdr 125:2022** (Gender Equality)

In addition, in 2024, Wind Tre obtained the three-year renewal of the certifications ISO 9001:2015, ISO 14001:2018, ISO 14064-1:2018, ISO 27001:2022 (for the Security Operation Centre), SA8000:2014 and successfully passed the maintenance audits of the other three existing certificates.

Wind Tre's Integrated System currently comprises ten certificates:

Environmental

- **Environmental management** | ISO 14001: 2015
- **Energy management** | ISO 50001: 2018
- **Greenhouse gas emissions** | ISO 14064-1: 2018

Social

- **Corporate social responsibility** | SA8000:2014
- **Gender Equality** | UNI PdR 125:2022
- **Occupational health and safety** | ISO 45001:2018

Governance

- **Quality** | ISO 9001:2015
- **Information Security – Cloud Services** | ISO 27001:2022 (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 27001:2022 (provision of Security Management services and management of the Security Operations Centre)
- **Service Management System** | ISO 20000-1:2018

All Wind Tre's corporate offices fall within the scope of application the Quality, Environment and Worker Health and Safety, Energy, Greenhouse Gas Emissions, Social Responsibility, Gender Equality and Service Management System certifications²¹.

The Information Security certifications include the Data Centre where the specific services are provided within its scope of application.

EcoVadis Rating

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 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. For each of the four topics, the company management system is assessed regarding

²¹ All the Integrated Management System certifications relate exclusively to the company Wind Tre S.p.A., with the exception of the UNI Pdr 125:2022 certification, which also includes Wind Tre Retail SrL

Policies, initiatives created within the company to implement the three pillars of ESG, certifications obtained, performance indicators, reputation analysis and participation in external initiatives.

EcoVadis awarded Wind Tre an **Advanced category score**²², positioning Wind Tre in the top 1% assessed by the network for the second consecutive year in 2024.

Child protection in the digital domain

[GRI 3-3]



86.7%

Children between third-year primary school and third year lower secondary school (9- to 14-year-olds) who use the internet independently

(Report of parents and children survey. Digital Education Pact of the City of Milan, 2024)

8 in 10

Children of between three and five years of age who know how to use their parents' mobile phones

(Bambino Gesù Children's Hospital)

47%

The percentage of adolescents aged 11 to 19 who say that they spend more than five hours online each day

(Generazioni Connesse, 2023)

In Italy, 98.3% of the population aged between 16 and 64 years owns of smartphone²³, and many studies confirm that the first use takes places at increasingly young ages. Eight children out of ten²⁴ aged between three and five years know how to use their parents' mobile phones, and the majority of adolescents, appr. 47%, spend between three and six hours a day on a smartphone, which is also often used at school during lessons. On July 2024, through Note no. 5274, concerning Provisions regarding the use of smartphones and electronic recording in the basic education [T.N.: children aged six to fourteen years] – School Year 2024 - 2025, the Italian Ministry of Education and Merit placed limits on the use of smartphones as a teaching aid. It is now well-known that using devices and the social media without being aware exposes minors to various online risks, such as cyberbullying, grooming and access to inappropriate content. To mitigate these risks, specific regulations have been introduced that are designed to protect minors, partly by introducing obligations for digital platform managers to adopt adequate measures. Furthermore, tools like parental control and content filters are essential to limit access to inappropriate material.

In addition to the risk factors, an aspect that should not be underestimated relates to the psychological effects that mass and unregulated use of smartphones and social media may cause in the new generations. In this regard, the study published by Jonathan Haidt²⁵ highlights four main effects of the abuse of digital platforms: addiction caused by stimulation that produces dopamine, a drop in face-to-face social interaction replaced by

²² EcoVadis divided the 2023 sustainability performance into five categories: Insufficient, Partial, Good, Advanced and Outstanding.

²³ We are Social, "Digital 2024, Italian data", 2024

²⁴ Adolescents and smartphones - <https://www.ospedalebambinogesu.it/adolescenti-e-smartphone-96695/>

²⁵ Jonathan Haidt, 2024, The anxious generation, Rizzoli, I ed., Milan

online interaction, an increase in sleep disturbances and lastly, fragmented attention spans, and therefore a reduction in the ability to concentrate.

In an increasingly connected world, where the boundary between the physical and digital dimensions is disappearing, how we manage our first approaches to the web and our digital identity are becoming issues of fundamental importance. Starting with the first times on the internet, it is essential to create **a digital environment that is as welcoming and safe as possible** and at the same time it is important that young people are informed of the risks and opportunities of the digital world. 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.

Fake news and online scams

Another risk factor, particularly but not only for new generations is that of attempted scams perpetrated over the web: according to the ScamAdviser²⁶ report, online scams in Italy have seen a significant increase, affecting various groups, including minors. Young users are particularly vulnerable to scams linked to online purchases and false promises of easy money. It is essential to educate children in the dangers of online scams and provide them with the tools to recognise and report suspicious activity. The cooperation of parents, educators and authorities is crucial to create a safe digital environment for young people.

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 goals

Goal	Horizon	Ambition	Courses of action	The point we're at
Families 100% family 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	<ul style="list-style-type: none">• 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 ('Borghi Connessi')• Raising awareness among parents through the development of free resources• Development and dissemination of digital security solutions for the protection of smartphones and devices designed for fixed connectivity• Information campaigns aimed at raising awareness about the issue of digital responsibility	<ul style="list-style-type: none">• NeoConnessi: over 21,500 classes of children in the last two years of primary school throughout Italy, with a total of more than one and a half million families reached since the project was launched• Launch of the parenting course "Digital families today: browsing together safely"• Launch of the competition for schools "Create your digital adventure": 504 participating classes, 714 projects presented

²⁶ Online Scams & Fraud in Italy, 2023

The NeoConnessi project

Wind Tre has always felt a strong responsibility for educating the most vulnerable people, like children and old people, for proper and informed use of technology. For this reason, in 2018, Wind Tre designed and made available to all *NeoConnessi* or “new connectors”, a digital responsibility project that seeks to support families and teachers when children go on the internet or use devices for the first time. The programme is developed through **four areas of education**, each organised by experts with a specific and innovative perspective: technological, psychological, pedagogical and teaching. Since its initial launch to date, the project has reached more than 1,500,000 families, involving the three main players in the educational programme, young people, teachers and families, in a shared reflection on the informed and safe use of the Internet and technology.

NeoConnessi topics:

DIGITAL WELL-BEING: balance between online activities and real life;

TRUST AND CONTROL: parental control; trust relationships within the family in setting rules; creating awareness of what is right and wrong online;

LIVING AND COMMUNICATING ONLINE: netiquette, responsibility and empathy; hate speech;

THE DANGERS OF THE WEB: cyberbullying; catfish/ false identities; risks of video games;

THE OPPORTUNITIES OF THE WEB: artificial intelligence; managing search engines for study; learning to use digital tools;

DISINFORMATION: identifying fake news/fake videos; altered perception of reality - AI;

SOCIAL MEDIA/WEB ADDICTION: how to recognise it and how to deal with it; managing screentime; digital detox;

ONLINE HOBBIES: how to cultivate them healthily and responsibly;

PRIVACY AND DIGITAL IDENTITY: Informed management of own data; digital footprint;

SAFER ON THE WEB: how to protect yourself from the dangers of the web and how to protect your own devices.

In 2023/24, the project reached more than 7,000 schools and involved more than 21,500 classes of children in the last two years of primary school throughout Italy with a series of resources 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, safety on the Internet, privacy parental control, screentime, cyberkindness and geolocation**. 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.

During the 23/24 school year, classes joined the *NeoConnessi* project and therefore worked on the “Born Digital” (“*Nati Digital*”) story, where they had the opportunity to take part in the competition “Create your own digital adventure”. Students could choose and rework the adventures contained in the book *Nati Digital* or try their hand at writing new stories.

714 projects were presented by the 504 classes that entered the competition throughout Italy. Each of the projects developed an original and interesting “digital” story, with young heroes getting to grips with the most diverse real-life situations. Some of the topics that emerged from the children’s work were used as inspiration for the drafting of the second volume of the “Born Digital” story.

Once again, this year, to support the teaching staff, who play a key educational role, Wind Tre has arranged for a **free training course** to be provided by La Fabbrica, a leader in the field of education and in the development of educational and training communication programmes for young people and families. From the beginning of the project to date, 8,000 teachers have taken the course, recognised by the Italian Ministry of Education and Merit and valid for the purposes in-service training pursuant to Italian Ministerial Decree 170 of 21 March 2016.

NeoConnessi – classes and pupils involved	S.Y. 2023-24	S.Y. 2022-23	S.Y. 2021-22	S.Y. 2020-21	S.Y. 2019-20
No. of classes involved	21,740	15,220	14,052	5,140	digital edition
No. of pupils involved ²⁷	500,020	350,060	351,300	128,500	93,750

In May 2024, Wind Tre and the Italian Paediatric Society (SIP) established a partnership to create the **NeoConnessi Guide – 10 steps for informed and protected families on the Web**: the ten guidelines to educate children and their families on the informed use of the Internet and digital devices. Through this agreement, the Guide has been divulged in paediatric studies and on NeoConnessi platforms.

In 2024, Wind Tre also made available to families the “**Digital families today: browsing together safely**” course, a training course launched to mark Safer Internet Day 2024. The course, created with the support of experts, offers parents advice on how to establish clear behavioural rules and good usage practices, in order to enable children to explore all the opportunities of the internet, without all the risks.

Wind Tre has made available to all the **NeoConnessi.it platform**, where visitors can find free educational resources and interdisciplinary activities for teachers and parents, and the *NeoConnessi* Facebook Group - Parents, Children and the Internet, a community where parents can discuss the key topics of the project.

Lastly, among the sections of the population that have greatest difficulty in integrating in an increasingly digital world are older people. To bring older people closer, Wind Tre provides **over-60s with a dedicated section of the portal, NeoConnessi Silver**, where there are articles and in-depth studies to allow them to discover the secrets and learn how to use all the potential of the web safely.

In addition, for this purpose, in the municipalities participating in the “*Borghi Connessi*” project, educational courses are organised to reduce the digital divide and give them the tools for informed and safe use by the over-60s, and **local schools** are involved in the *NeoConnessi* project. For further information on this initiative, see the specific paragraph.

In the programme for the school year 24/25, Wind Tre plans to:

- Provide continuity to the project to ensure protection of minors, involving as many families and schools as possible;
- Broaden the target to reach an increasing number of families and secondary school children;
- Develop the initiative with a view to providing an initiative that is increasingly in line with technological evolution and the main studies on the subject;
- Broaden the scope of the *NeoConnessi* initiatives and contents, to further increase its prestige, through the creation of a Scientific Committee, for example.
- Lastly, boost and extend the magnitude of the NeoConnessi, with the support of campaigns, collaborations and partnerships.

²⁷ Calculated by multiplying the number of classes involved by an average number of 25 pupils per class in accordance with the indications provided by the Italian Ministry of Education and Merit for the 2021/22 school year (23 for the 2022/23 school year).

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. In this regard, the company's goal is to offer solutions aimed at the security of devices and the safety of the entire family.

In addition, Wind Tre strives to **constantly develop its offerings to keep Wind Tre customers safe in the face of evolving Internet threats.**

Wind Tre provides two protection services for mobile customers: **Più Sicuri Mobile** (Safer Mobile), which is also available for professionals with a VAT number, and **Più Sicuri Mobile Pro** (Safer Mobile Pro). These services are designed to protect smartphones from Internet risks through various functions:

- ✓ Immediate protection from the moment of purchase (without requiring installations or authorisations)
- ✓ Access attempt notification page on malicious sites on the Wind Tre sites
- ✓ 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

Wind Tre also foresees the **Più Sicuri Casa & Ufficio** ('More Secure Home & Office') service which 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.

Internet Child Protection Service

In November 2023, Wind Tre made its **Child Protection Service** available, blocking online access to apps or sites that are not suitable for or are prohibited to underage users on 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 can be used on both fixed and mobile 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 works directly through the configuration of the network and has been implemented online with the AGCOM 9/23/CONS Resolution. The categories blocked are 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, sects and cults.

Cybersecurity and privacy

[GRI 3-3]



273

Average monthly number of cyber-attacks in Italy

(Clusit Report 2024 – Half-year edition, October 2024)

+400%

Increase in malware attacks on IoT (Internet of Things) devices against 2023.

(Deloitte Cybersecurity Threat Trends Report 2024)

€2.15 billion

Cybersecurity investments in Italy in 2023

Management (Cybersecurity & Data Protection Observatory of the Milan Polytechnic School of Management)

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. National and international community security poses a challenge that is rapidly evolving in an increasingly complex manner given that the development and fast circulation of new technologies gives rise to real difficulties and constantly emerging new threats. The **cybernetic** threats are an increasingly dangerous battleground from both a geopolitical and economic perspective: in 2024, the number of data violations increased by 12% against 2023²⁸ and it is estimated that the overall cost of cybercrime will reach USD 10.5 trillion by the end of 2025²⁹.

Against this backdrop, with IT threats that have increased in complexity, ransomware attacks³⁰ and data violations dominating the panorama with an average of 273 cyberattacks per month in Italy³¹, cybersecurity has become the subject of intense EU and domestic regulatory activity³², and of greater awareness and focus on the business community. Companies are dedicating more and more resources to cybersecurity, investing in advanced technologies and staff training to tackle the risks linked to cyber threats. In Italy, in 2023, investments in cybersecurity reached Euro 2.15 billion³³, with a 16% on 2022.

In this scenario, 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**.

²⁸ Verizon Data Breach Investigations Report 2024

²⁹ Cybersecurity Ventures Global Cybersecurity Risks Report 2024

³⁰ Up 13% on 2023 - IBM Security X-Force Threat Intelligence Index 2024

³¹ Clusit Report 2024 - Mid-Year Edition, October 2024

³² Directive (EU) no. 2022/2555 Nis 2; Legislative Decree no. 138 of 04 September 2024, transposing the same Decree.

³³ Cybersecurity & Data Protection Observatory of the Milan Polytechnic School of Management, 2024

Our commitment

- Investing in a cybersecurity infrastructure to protect the data of customers
- Disseminating a Cybersecurity Mindset throughout the company in order to prevent human error
- 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
- Maintain an ongoing dialogue with the authorities in order to ensure not only regulatory compliance but also to define and develop the best security and privacy standards in the telecommunications area
- Offering services designed to help corporate customers to handle the digital evolution of their businesses safely

Our 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	<ul style="list-style-type: none">• 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	<ul style="list-style-type: none">• Euro 18.5 million invested in 2024 alone in services and platforms for data and systems security• Security by Design: improved risk prevention and mitigation processes• Human Factor: staff training to develop a Cybersecurity Mindset• Numerous on-site audits with external privacy officers

Focus on data security

[203-2]

Wind Tre’s collaboration with the institutional bodies responsible for cybersecurity continued in 2024, 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 2024 alone, Wind Tre’s direct investments in services and platforms for data and system security amounted to approximately Euro 18.5 million ³⁴. These investments focused on the following main lines of development:

- **Network security** – Wind Tre continued to integrate 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.

³⁴ Value refers to the total capital expenditures (CapEx) and operating expenses (OpEx)

- **Service continuity** – In 2024, Wind Tre implemented a structured disaster recovery process with an aim to increase 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. Through the skills and technologies developed internally, Wind Tre provides its **B2B customers with dedicated services** for cybersecurity management, drawing on the services of RAD, a company specialising in cybersecurity solutions, which has also been part of Windtre Group since 2023.
- **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 and segregation of information with the adoption of the “Zero Trust” model.

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 2024, Wind Tre also established a policy for the informed and ethical adoption of Artificial Intelligence technologies, which provides the appropriate assessments for the cybersecurity of each AI system.

Lastly, over the course of the year, 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.

Acting on the “human factor”

The human error, the so-called H factor (Human Factor) continues to be one of the main causes of security incidents and remains a major cybersecurity weakness for most companies. That is why it is important to promote a **Cybersecurity Mindset** within the company, a culture that seeks to **consolidate knowledge of risks and indicate the rules of good conduct** to mitigate risks relating to cybersecurity. The constant strengthening of this mindset can be achieved by taking action on two levels: **awareness**, which leads people to become more aware of their 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 line current regulations, Group guidelines and best practices, Wind Tre has developed awareness-raising and training initiatives on cybersecurity issues for all of its staff.

Shown below is an overview of the main initiatives:

- **WeCyber, the Cyber Security web portal** on the corporate intranet has continued with its activities. It is an area dedicated to providing rapid access to essential information on cybersecurity to increase awareness and provide real time updates, containing useful information to act with greater competence in cyberspace.
- **A new training course** designed to reinforce good practices for responsible use of devices, focusing on the importance of protecting corporate data, targeting all employees, with intermediate and final tests.
- **Business Continuity Awareness initiative** to make the entire corporate population aware of the advantages of a company having a continuity framework to support its critical processes³⁵.
- **Training sessions and learning pills** for the Internal Sales force and external sales partners (Agents, Agencies and Telesellers), including awareness-raising sessions on the importance of respecting the privacy regulations and implementing security measures.
- **Involvement of Cybersecurity Evangelists in raising awareness of the corporate population:** as key figures in the Security area identified in each company department, the aim of the Cybersecurity Evangelists is to promote and raise awareness of cybersecurity culture within their own departments.
- **Holding 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. Over the last two years, approximately **75% of the corporate populations** has been involved in personalised awareness sessions.
- **Security tips** for top and middle management with evidence of cyber risks linked to a senior corporate level. These tips have the dual objective of boosting awareness in the top management, who are attractive targets for hackers, and at the same time, increasing their engagement in the issue of cyber risks both on a personal level and to allow them to increase awareness within their own teams.
- **Holding of regular phishing campaigns** directed at selected employees in the various departments of the company with the aim of raising awareness about the phenomenon 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 action** directed at all employees by sending e-mails to raise awareness with timely warnings about various issues, such as specific phishing attacks or other security issues. In 2024, one example of this was the awareness communication on the use of generative AI in the company.

In addition, following the evolutions of the Italian regulatory framework, once again, in 2024, Wind Tre held training sessions focusing on cybersecurity regulations and **meetings with suppliers** to inform them about recently introduced regulatory obligations and establish the processes arising from implementation of recent changes in regulations.

Lastly, **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.

³⁵ 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 updating and improvement allows potential threats to be identified and simultaneously improves its resilience and ability to effectively respond to adverse events. From this perspective, in 2024, in its Business Continuity Plans for example, Wind Tre considered Phlegraean Fields volcanic risk.

Cybersecurity Glossary:

1. **Phishing:** technique of sending deceptive e-mails to obtain sensitive information and “deliver” malware while pretending to be a trusted source
2. **Smishing:** are scams using SMS (text messages) to convince to victims to reveal sensitive information, such as login information or credit card pin numbers
3. **Vishing:** are telephone scams to steal sensitive information, such as login information or credit card pin numbers
4. **Spoofing:** [cyber-attack technique in which malicious persons hide their identity, pretending to be a trusted source, to obtain access to confidential information or steal sensitive data](#)
5. **Quishing:** form of phishing attack that cleverly uses QR codes to induce users to visit malicious websites
6. **Deepfake phishing:** form of phishing attack that uses Artificial Intelligence to create video and audio recordings that are able to reproduce real people that have some relationship with the victim
7. **Malware:** malicious software designed to damage or undermine an information system
8. **Ransomware:** a kind of malware able to encrypt a user’s data and then request payment to unlock the data
9. **Adware:** a kind of malware that displays advertising without the user’s consent
10. **DDoS (Distributed Denial of Service):** attack designed to render online inaccessible by flooding a server or network with malicious traffic so that it stops working
11. **Spyware:** software that collects user information without the user’s consent
12. **Trojan (horse):** malware that masquerades as legitimate software to infect a system
13. **Virus:** program that replicates and spreads to other computers, often causing damage
14. **Worm:** malware that self-replicates and spreads independently over networks
15. **Man-in-the-Middle:** manipulation of a communication between two parties without them realising
16. **Zero-Day Exploits:** attacks that exploit cybersecurity vulnerabilities before the programmers can resolve them
17. **DNS Spoofing;** re-routing of the victim to malicious websites by manipulating the association between domains and IP addresses on a DNS (Domain Name Service) server
18. **Cross-Site Scripting:** entering a malicious code in websites to steal confidential information and install malware in user browsers
19. **SQL injection:** exploiting website programming errors to inject malicious code into a database
20. **Cyber Intelligence:** information gathering and analysis activity for predict cyber threats

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 reference to the Italian and European Community legislative framework, company policy regarding privacy and data protection is primarily aimed at ensuring regulatory compliance, taking into account the introduction of the **General Data Protection Regulation (GDPR)** that came into force in 2018, the **Privacy Code**, as amended by Legislative Decree 101/2018 and the **specific provisions of the Personal Data Protection Authority and European industry standards**.

In 2024, Wind Tre completed the revision of existing contracts, policies and operating instructions with its partners with the supplementary provisions provided for in the Code of Conduct of 09 March 2023, approved by the Personal Data Protection Authority. The documents in question were signed again by all the partners involved in telemarketing and teleselling on behalf of Wind Tre.

The company also brought some of the processes and procedures into line with the Code of Conduct, with the introduction of “double opt-in” mechanisms in the processing of sensitive new acquisitions, for example.

Wind Tre formally signed up to the Personal Data Protection Authority’s Code of Conduct for telemarketing and teleselling activities at the end of December 2024.

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.

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” campaigns³⁶.

As regards proper data management, on the topic of authorisation of data processing, profiling, enhancement and transfer, Wind Tre scrupulously respects Personal Data Protection Authority (DPA) requirements. The company maintains a collaborative relationship with the DPA in order to define the best standards regarding the protection of privacy in the field of telecommunications.

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 scrupulous governance of the data under its control. In 2024, Wind Tre supervised **425** partners appointed as “Data Processors” pursuant to Article 28 of the GDPR. Specifically, in 2024, the DPO’s office carried out 75 supervisory activities in relation to its Suppliers, Agents, Agencies and Telesellers, whereas the Audit department performed 350 direct audits on Dealers.

With a view to accountability, the DPO’s office also performed ten internal assessments in Wind Tre to verify the proper application of the GDPR regulations and further relevant standards, seven of which have been completed, and three of which are in progress.

Customer reports, including those received by the Authority, are also regularly answered.

Inspections by the Data Protection Authority (no.)	2024	2023	2022
Number of inspections	0	0	1

The inspection carried out by the Personal Data Protection Authority in October 2022 regarding telemarketing/teleselling began with the Personal Data Protection Authority’s preliminary investigation and was completed following the defence brief and subsequent responses to the requests for amendments and further information and following the Wind Tre hearing with the Personal data protection Authority. In January 2025, Wind Tre was notified of a fine for telemarketing and teleselling, although for a lesser amount than those levied against other operators in various market sectors.

³⁶ The self-assessment campaign for 2024, open to all third parties appointed as data processors in July 2024, came to a definitive end in December 2024

Privacy-related checks on suppliers (no.)	2024	2023	2022
Audits performed	425*	375	296
Verification questionnaires administered to external suppliers	526**	482	525
Verification questionnaires are sent to Wind Tre's sales agents and points of sale	4945**	4910	4955

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

** The self-assessment figures shown above are a picture of the numerical values that are provided for that report. Obviously, the number may be subject to change since the self-assessment campaign may be reopened to allow partners to participate and therefore complete their own self-assessments owing to different requirements that may arise.

In addition, in 2024, in compliance with the 2008 Personal Data Protection Authority Provision on Systems Administrators, updated in 2009, Wind Tre strengthened its existing "Systems administrators operations audit" process.

Lastly, Wind Tre held numerous **privacy training activities in 2024**, for the various company departments and for its sales partners.

Pursuant to the current regulations, Wind Tre and Opnet report potential events to the Data Protection Authority that may potentially lead to data breaches. Should accidents occur, Wind Tre and Opnet undertake 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 [GRI 418- 1a, 1b]	2024	2023	2022
Events detected by Wind Tre and Opnet, notified to the Data Protection Authority	9 *	5	2
Actions formally notified to Wind Tre by the Italian Data Protection Authority regarding data breaches	0	2**	1

* In 2024, the Data Protection Authority was notified of nine data breach events (one of which Opnet), three of which have been formally closed by the Data Protection Authority.

** Value no. 2, 2023, included not only the data breach but also another procedure relating to telemarketing and teleselling.

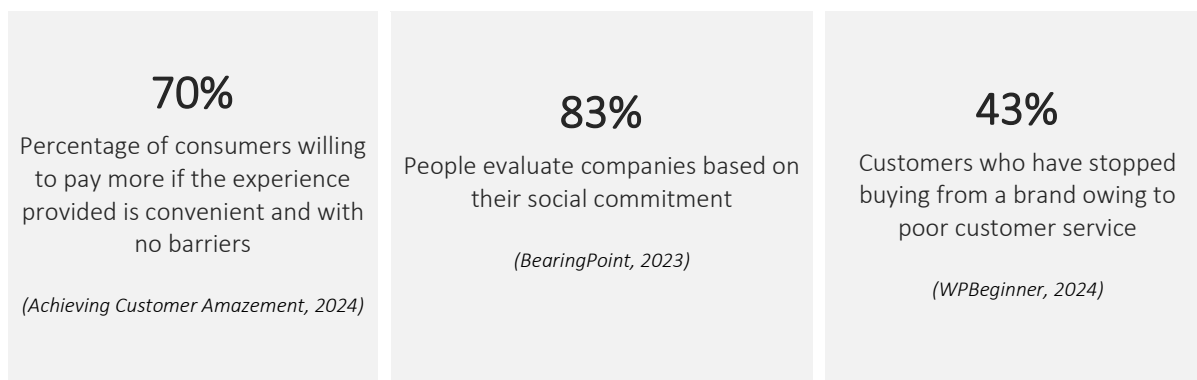
"Please Don't Call" protects customers from unwanted calls

Protecting connections and digital life is part of WINDTRE's commitment to "digital responsibility". 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 reports from the customers themselves. If a customer receives a call from a potentially suspicious and unidentified number, s/he 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. **Potential unwanted callers are updated every 30 minutes**. This process is automatic and does not require any action on the part of the user.

The service is also available for VAT-registered professional customers. At the end of December 2024, around 2 million customers had enabled the service and used it least once.

Closer to our customers



Customer Experience is the set of perceptions, feelings and emotions that a customer feels when dealing with a company through all of the contact points available. This is not limited to the simple purchase of a product or service but also includes all the phases and ways a customer comes into contact with the brand, from the initial search to post-sales.

Consumer expectations are becoming more demanding and, more importantly, more fluid in various product and service categories. A positive experience creates stronger ties, transforming occasional customers into brand fans. Satisfied customers tend to praise the brand and leave positive reviews, improving the company's business reputation. A better customer experience can be a crucial factor in outshining the competition.

Today, more than ever, **customers** expect transparent communication (on prices, conditions, and changes in service), **efficient supply** (fast deliveries and real-time information), and **personalised experiences** (offers, content, and tailored products). According to the 2024 ACA study³⁷, 51% of consumers believes that excellent service is more important than price, whereas 70% are willing to spend more if the experience provided is convenient and has no barriers. Furthermore, 81% of consumers prefer to deal with companies that offer tailor-made experiences.

Building sound relationships and offering an excellent customer experience is not only a great responsibility but is also the most effective way to keep customers loyal and attract new ones. Among the new expectations of customers, the **interest in sustainability plays a key role** in selecting a brand. According to a study performed by BearingPoint³⁸, 83% of interviewees said that they evaluate a company based on its social commitment, and 47% considers social responsibility and the environment as an essential criterion for deciding whether to purchase a product or service from a specific company.

Our commitment

- Offering outstanding customer experience in order to enhance customer relations with a view to top reliability and transparency
- Offering customers a unique experience through multiple contact channels

³⁷ <https://hyken.com/wp-content/uploads/2024/08/ACA-STATE-OF-CX-2024.pdf>

³⁸ BearingPoint, Customer Experience 2023

- Being ready to constantly improve the services offered to customers, even by promoting an attentive dialogue with the consumer associations
- Being aware of one's role within the community, and improving one's ability to listen to people in order to understand and meet their needs

Assistance channels

Over recent years, consumer care requirements have changed significantly. Expectations are constantly increasing, and customer experience takes on an ever-greater importance. Consumers require rapid responses, customised solutions and a service that is available on various channels. Furthermore, the request for care and support is not expressed only at the purchasing stage. Customers expect to establish a dialogue and an ongoing relationship with the company in every stage of their experience: prior to purchase, during the establishment of the sales agreement, following supply, when needs or habits change or if any problems arise, until the end of the contractual relationship.

Wind Tre's main goal in managing Customer Care is to **simplify and render consistent communication with the customer in relation to information requested and care provided**, through the combination of several contact channels. The method of communication, therefore, becomes as important as the communication itself. Offering different channels for interaction means satisfying every diverse need and type of customer.

In order to guarantee the customer ever-increasing speed and autonomy in finding the information required, Wind Tre continues to improve the use of the information and care with the aid of tools supported by Artificial Intelligence, dedicated to residential customers, at the same time maintaining a high level of attention on accuracy and efficiency of the customer experience provided by the call centres, to provide a full and efficient spectrum of possibilities.

The company therefore provides customers with numerous channels, starting with the digital ones:

#IVR: (Interactive Voice Response), provides users with a series of options, including automatic options, allowing them to obtain the information required faster. IVR also allows customers to contact the Customer Service Operators, guaranteeing an average response time of less than 90 seconds. Some of the IVR options are supported by a Vocalbot, which allows it to speak naturally by using Artificial Intelligence.

#App and Website, allow customers to receive diverse information independently, and to perform certain transactions. Some of the App and Website functions are supported by a Chatbot, which allows them to write naturally by using Artificial Intelligence.

#Call Centre: naturally, in addition to the digital channels, the Customer Service Operators are also on hand. Wind Tre dedicates specialised Call Centres to residential customers and business customers, for all group brands and services.

As shown in the tables, over the last three years, customer interaction requirements have been decreasing continually, partly owing to the growing simplification of the services provided by the company. Furthermore, customers show a marked preference for using digital channels, and particularly the app, which is the most used channel.

	2024	2023	2022
TOTAL INTERACTIONS (digital+human, Million/Year)	277	324	427
% DIGITAL INTERACTIONS on Total Interactions	95%	95%	96%
<i>Of which APP (n° App Login / Total Digital Interactions)</i>	93%	92%	92%
<i>Of which other digital channels (IVR, Vocalbot, Chatbot; n° Interactions / Total Digital Interactions)</i>	7%	8%	8%
% HUMAN INTERACTIONS on Total Interactions	5%	5%	4%
<i>Average response time (Seconds)</i>	94	88	89
<i>Number of calls answered by Call Centre Operators (Million/Year)</i>	13	15	16
<i>of which WINDTRE</i>	11	13	13
<i>of which Very Mobile</i>	1	1	1
<i>of which WINDTRE BUSINESS</i>	1	2	2

‘Informati e Sicuri’ (Informed and safe) service

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. With its free hotline, the company 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.

Customer satisfaction

With a view to ensuring a high-quality service and aligning its corporate strategies with customer needs, once again in 2024, Wind Tre measured its telecommunications customers’ satisfaction on a scale of 1 to 10 by means of 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 number of customers and turnover – the survey was performed in October, 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 7.72 for WindTre customers** and 7.88 for Very Mobile customers, with an **overall satisfaction of 7.70 for WindTre** and 7.87 for Very Mobile.

The tables below show the values of the main service components included in the Customer Satisfaction surveys. Customers were asked about their overall satisfaction for each item, measured on a scale of 1 to 10.

Results of mobile consumer customer satisfaction analyses (surveys performed E&Y, scale of 1-10)	WINDTRE
	2024 ³⁹
Overall satisfaction	7.70
Rates	7.64
Customer Value Management	7.44
Customer Care Services	7.70
IVR - Interactive Voice Response	7.55
Call Centre operator	7.65
Customer loyalty	7.72
Advertising effectiveness	7.92

Results of mobile consumer customer satisfaction analyses (surveys performed E&Y, scale of 1-10)	VERY MOBILE
	2024
Overall satisfaction	7.87
Rates	7.95
Customer Value Management	7.59
Customer Care Services	7.90
IVR - Interactive Voice Response	7.71
Call Centre operator	7.89
Customer loyalty	7.88
Advertising effectiveness	7.90

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 2024, 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 year, Wind Tre strengthened its position in the majority of the components of its reputational profile. Its reputational profile is made up of seven 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;

³⁹ In 2024, owing to new tender for the assignment of the research, there is a break with the past interpretation and the data prior to 2024 are not presented.

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;
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.

In 2024, Wind Tre's reputation was 61.4, with an increase of 1.5 points on 2023, making Wind Tre the company with the highest growth against 2023 in the telecommunications sector in Italy. The increase in WindTre's reputation was led by the areas of **Innovation** (+1.5 pts on 2023), **Citizenship** (+1.5 pts against 2023), **Product** (+1.4 pts against 2023) and **Conduct** (+1.3 pts against 2023), in which aspects relating to quality and reliability of products and services capable of satisfying customer needs were very well perceived, as were the aspects of a company that is ethical, well-organised, open and transparent, and capable of influencing society positively.

Brand Equity

The brand equity study assesses the health of the brand based on consumer perception in relation to three parameters: MEANINGFUL, DIFFERENT, and SALIENT. The more a brand's associations are meaningful, different and salient, the greater their ability to lead the consumer towards choosing that brand, thus influencing the measurement of brand power. The share ranges between 0 and 100, therefore the sum of the bands analysed is 100.

In 2024, BE Telco (October survey) WINDTRE achieved an increased "Brand Power" of 14.7 (+0.9 points), confirming its commitment to being a major and competitive brand that can respond to the needs of Italian families.

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. - Regional communications committees, and CCIAAs - Chambers of Commerce, Industry, Agriculture and Crafts) and the **Alternative Dispute Resolution procedure** carried out by consumer associations.

Mediation requests are organised before the Communications Authority (AGCOM) and/or Co.re.com. - Regional communications committees, assigned regionally by AGCOM. The parties take part in the mediation proceedings in the presence of an appointed official, acting as a referee, and the minutes of the agreement drawn up are enforceable. The mediation is managed online through a dedicated portal: the user can quickly and easily submit a mediation request by accessing the AGCom "*ConciliaWeb*", through the website: <http://conciliaweb.agcom.it>.

The **Alternative Dispute Resolution** (ADR) procedure, performed with through the **Consumer Associations** registered with the National Board of Consumers and Users (CNCU) it is possible only in the event that the **prior claim** submitted did not receive a response within the deadline of 45 days or if the customers are not satisfied with the response received. The claim may be forwarded through the dedicated portal, accessible at the link: <https://conciliazioniparitetiche.windtre.it/> and is managed directly online.

In any case, the parties nevertheless retain the right to request compensation for any further damages in the courts.

With Law no. 206 of 2021, parliament granted the government powers for the efficiency of the civil proceedings and to revise the regulation of the alternative dispute resolution tools.

With Legislative Decree 149/2022, implementing Law 206/2021, the **Cartabia Reform**.

As a general observation, it should be noted that in 2024, in keeping with what happened in 2023, partly due to the entry into force of the aforementioned reform, a partial decrease in judicial activity was seen as a likely result of uncertainty concerning the application of the new legislation.

For the future, it will therefore be necessary to observe and assess the further implications of the Cartabia Reform to understand potential future trends regarding disputes. As a general rule, as shown in the tables below, both the complaints and disputes show a downward trend, and the grand majority of them had a positive outcome for the company.

Phase	Resolution of customer complaints		2024	2023	2022	2021	2020
Complaints from Consumer Associations		no.	4,518	5,172	4,543	5,178	6,070
First instance	Mediation requests submitted to the Co.re.coms	no.	11,178	12,232	11,768	16,980	23,035
	Favourable outcomes	%	87%	86%	84%	80%	81%
	Requests for Alternative Dispute Resolution through the consumer associations	no.	1,660	2,169	2,459	3,125	3,667
	Favourable outcomes	%	94%	96%	94%	94%	94%
Second instance	Request for dispute settlement	no.	1,069	1,182	1,434	2,103	2,552
Urgent actions	Requests for adoption of urgent measures	no.	1,285	1,390	1,460	2,431	2,752
Total			19,710	22,145	21,664	29,817	38,076
Litigation with customers			2024	2023	2022	2021	2020
Pending as of 31/12		no.	2,060	6,053	11,308	13,530	13,339
Favourable outcomes		%	75%	81%	76%	75%	72%

Dialogue with consumer associations

In 2024, Wind Tre maintained the relationship established over the years with the Consumer Associations, supplying the contents of the memorandum of understanding signed with the main associations on the national scene (Adiconsum, Adoc, Cittadinanzattiva, Federconsumatori and U.Di.Con). The meetings held over the course of the year facilitated the involvement of the associations in an active dialogue, seeking to share

the strengths and weaknesses of the regulations that impact telecommunications companies and as a result, its consumers. Particular attention was focused on raising awareness of the parties of the strategies and logics that drive a mature sector, but one that is still particularly dynamic and committed, with a special regard for emerging scenarios.

Efforts to involve the associations and their members were also supported through the ‘Special Caring’ channel, which is intended for the management of complex cases where special care is required. This measure aims to ensure the ongoing improvement the customer experience by means of dialogue between the parties.

Clarity and transparency in commercial communications

[GRI 417-3]

The Advertising Self-Regulation Institute sets the parameters for “honest, truthful and proper” commercial communications to safeguard fair competition between companies and consumers through a **Commercial Communication Self-Regulation Code**, binding for those participating in the initiative, in other words, the main operators in the sector (companies that invest in communication, agencies, consultants, means of communication, dealerships, etc.). In 2024, Wind Tre had only one complaint of non-compliance with the Commercial Communication Self-Regulation Code, which ended with a ruling of deceptiveness (with the resulting obligation to halt circulation of the banned message) in relation to an advertising campaign for the mobile offering under the Very Mobile brand, insofar as it made a claim of generic speed, omitting to specify that the speed to which it referred to service activation only and not to browsing. The table below shows the number of disputes registered over the past five years.

Non-compliance disputes relating to marketing communications [GRI 417-3]	2024	2023	2022	2021	2020
Non-compliance disputes to legislations and regulations resulting in fines or penalties (no.)	0	0	0	0	0
Non-compliance disputes to voluntary commitments (no.)	1	1	0	1	2

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]



73.4%

The percentage of connections in Italy at speeds greater than 100 Mbit/s at year-end 2023
(AGCOM, Annual Report 2024)

41.2%

Percentage of adult Italians who, despite being Internet users, have insufficient skills or no skills
(ISTAT, 2023)

1 Gbit/s

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.

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 everyone⁴⁰. Italy started off with a persisting **digital divide** depending on region.

⁴⁰ European Union, Declaration on Digital Rights and Principles, 2022.

The last figure reported⁴¹ for the “1-Giga Plan”⁴² was 1,469,526 homes and businesses connected with ultra-broadband (41.45%) and 1,057,692 in progress (29.84%), with rates of progress that vary from one region to the next.

However, there is also a major **skills divide**. According to ISTAT⁴³ data, in Italy, at least half of all adults (45.9%) have adequate digital skills, whereas more than a third (36.1%) have insufficient skills and 5.1%, (bringing the sum between insufficient and no skills to 41.2%) despite being Internet users, have no skills whatsoever. On the European scene, Italy is one of the countries with the lowest proportion of people with at least basic digital skills, trailing the EU average by almost 10%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.

From this perspective, educational courses are necessary not only for the use of the Internet and digital devices, but also for the promotion using digital tools with increasing awareness. Not surprisingly, to bridge this gap, Italy’s National Recovery and Resilience Plan (PNRR) anticipates an investment of Euro 195 million dedicated to reducing the proportion of the population currently at risk of digital exclusion by training two million people by the end of 2026.

Our commitment

- Supporting the reduction of the digital divide 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 dialogue with public administrations to facilitate access to new technologies
- Disseminating the skills required to face the challenges of the digital transition, by highlighting opportunities and risks

ESG Goal

Goal	Horizon	Ambition	Courses of action	The point we're at
Connected Villages	2025	Foster the growth of small Italian villages through to dissemination of skills, connectivity and digital technologies	<ul style="list-style-type: none"> • Development of educational programmes targeting the public administration, businesses, and members of the public • Development of memoranda of understanding aimed at opening a dialogue of confrontation with local administrations of small municipalities • Development of connectivity services for communities, such as Wi-Fi coverage in public areas • Dialogue and partnerships with industry associations 	<ul style="list-style-type: none"> • Participation of 103 municipalities in the <i>Borghi Connessi</i> project, for a total of 400,000 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 the municipalities which belong to the <i>‘Connected Villages’</i> project

⁴¹ <https://connetti.italia.it/> 19/02/2025

⁴² The aim of the “Italy at 1 Giga” Plan is to promote investments in ultra-broadband through public intervention that allow all users to be guaranteed an online connection speed in line with the European “Gigabit Society” and Digital Compass objectives. The aim of the initiative is to create ultra-broadband network infrastructures that guarantee transmission speed of at least one Gbit/s through Italy by 2026

⁴³ ISTAT, Digital skills of citizens - 2023 - [Link](#)

⁴⁴ Digital Decade Country Report 2023, Italy



- Participation in events and funding of **local initiatives intended to benefit communities**

to promote digital literacy and the responsible use of technology

- Launch of the **Borghi Connessi** ("Connected Villages") Academy
- **Partnerships** with National Association of Italy's most beautiful villages '*I Borghi più belli d'Italia*' and with the **Italian Digital Nomads Association (AIND)**
- **Together with ASviS** for the 2024 Territories Report

Connected Villages

The **Connected Villages** (Borghi Connessi) project was launched at the end of 2021 with an aim to help the small villages to overcome the Digital Divide, through actions that can both increase knowledge and skills about new technologies and trigger new, more sustainable growth. The project is focused on four main areas:

- **Training on new technologies for citizens of all ages, for small businesses and Public Administration.**
- **Development of services dedicated to the community, which stimulate sustainable development initiatives.**
- **Consulting on technological needs to provide assurance on the selection of the best solutions.**
- **Assessment of the TLC infrastructures to improve existing networks.**

In 2024, twelve municipalities were added to the network, making up a total of 103 municipalities and over 400,000 citizens since the launch of the initiative.

Once again, in the 2023/2024 school year, all the primary schools in the participating municipalities were often the opportunity to join the *NeoConnessi* initiative. This initiative has been designed to ensure children in fourth- and fifth-year primary school are taught about informed and responsible use of technology and the Internet. At the end of the school year, schools in 60 municipalities had taken part.

In 13 municipalities belonging to the network, dedicated training was also provided to adults, with the *NeoConnessi Silver* initiative. This initiative involved the attendance of two half-day in-person seminars, during which attendees learned how to use the mobile phone, Internet and digital technologies safely with simple and user-friendly explanations.

In March 2024, **Borghi Connessi Academy** was launched. This is a training initiative specifically targeting local government, the aim of which is to spread knowledge of new technologies and solutions that can improve citizens quality of life from an environmental and social perspective. The activities are divided into in-person seminars, webinars and round tables, and involve the participation of experts on topics of interest to small municipalities. During the year, **six in-person seminars, one webinar focusing on digital nomadism and one round table focusing on policies for repopulating rural areas** were held.

Together for the growth of small Italian municipalities

In 2024, a partnership was also launched with **Riabitare l'Italia**, an association founded in 2020 designed to promote, discuss and implement ideas and goals for attaining a better balance between people, resources and places, with a particular focus on rural, marginalised and outlying areas.

As part of the partnership a round table focusing on repopulation of rural areas policies has been organised together with the association. The event was preceded by preparatory sessions that involved various municipal representatives, mayors and councillors. The final debate has been held in Rome on 28 October 2024, at the Associazione Civita headquarters in Piazza Venezia.

In addition, in 2024, Wind Tre's partnership continued with the **Italian Digital Nomads Association (AIND)**, a non-profit organisation which aims to promote remote working and digital nomadism. AIND representatives participated in sessions with the *Borghi Connessi* Academy and together with them, Wind Tre organised a webinar focusing on digital nomadism, which was held on 27 March 2024, also as part of the *Borghi Connessi* Academy initiatives.

Wind Tre for the Most Beautiful Villages in Italy (Borghi Più Belli d'Italia)

Lastly, in 2024, Wind Tre continued its cooperation with the **Borghi Più Belli d'Italia Association** (Italy's most beautiful villages), a network of 360 municipalities that seeks to promote the great wealth of history, art, culture and scenery present in small Italian towns. Specifically, Wind Tre participated in both the association's annual meeting, held from 5th to 7th April Irsina (MT), and the **XVI National Festival of Italy's Most Beautiful Villages**, in the municipalities of Oriolo and Rocca Imperiale (CS), from 6th to 8th September 2024. At the festival, in addition to giving a presentation on the *Borghi Connessi* initiative, it took part with a session focusing on Data Analytics technology. During the session, it described a study of the tourist flows in the municipality of Rocca Imperiale during the preceding August 2024, fuelling an interesting debate on the use of data in the sustainable development of tourism in the regions.

As part of its partnership with the *Borghi più Belli d'Italia* Association, with the aim of making its solutions more accessible, Wind Tre launched *Borghi Connessi* Family offer for Friends of the Villages cardholders, with an exclusive bundle: 200 Giga in 5G, unlimited minutes and 200 text messages a reduced price on the standard offers.

Wind Tre together with ASviS for the 2024 Territories Report

Wind Tre supported ASviS in the creation of the #RapportoASviSTerritori⁴⁵, a document that describes the positioning of Regions, Provinces, metropolitan cities, urban areas and Municipalities in relation to the achievement of the 17 Sustainable Development Objectives on the 2030 Agenda.

Wi-Fi Calling

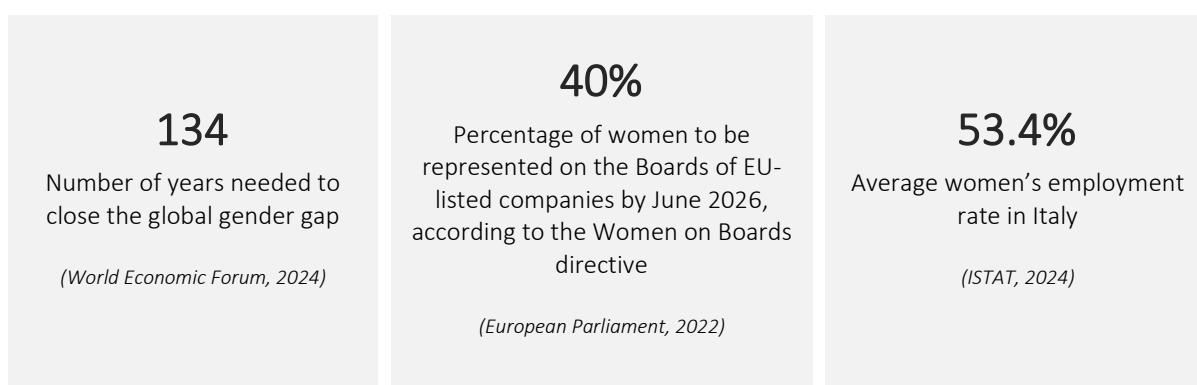
The Wi-Fi Calling feature **allows users to make and receive calls even if there is no mobile signal** through a Wi-Fi connection. This feature addresses a specific need: to be able to receive calls on a smartphone and to make calls – including emergency ones – even from within thick-walled buildings, 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. **This service is based on innovative technologies capable of overcoming the Digital Divide in mobile coverage, attesting to Wind Tre's ongoing commitment to making its customers' lives easier.**

In 2024, Wind Tre continued to increase the number of smartphones compatible with this feature.

⁴⁵ https://asvis.it/public/asvis2/files/Pubblicazioni/Rapporto_Territori/2024/Rapporto_Territori_2024_final.pdf

Wi-Fi Calling is available **free** to Wind Tre's consumer and business customers with compatible smartphone devices⁴⁶. 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.

Gender Parity



Gender equality is closely linked with social justice and is one of the key objectives of the United Nation's 2030 Agenda. Therefore, equality must become a global priority and requires everyone's commitment to encourage equality in all aspects of life. But much remains to be done. The data gathered by the World Economic Forum relating to the Global Gender Gap are anything but encouraging and identify 134 years still needed globally to close the gender gap. As regards our country, in the 2024 ranking, **Italy's** score was 0.703 out of 1, **taking 87th place overall**⁴⁷, dropping back eight places on the 2023 ranking. This indicates a significant slowdown in the reduction of the gender gap and on the European ranking, Italy ranks 37th out of 40, followed by Hungary, the Czech Republic and Turkey.

As regards the **world of work**, the snapshot provided by ISTAT at the end of 2024⁴⁸ reported a slight increase in female employment (15-64 years) against the preceding year (+0.3%, just above the figure for men 0.2%), but our country is **still far behind the European average**, with a female employment rate 53.4%, against the EU average of 70.2%. The gender gap is also persisting in terms of pay, with an even greater gap in Italy⁴⁹.

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; so much so that 59% of women employed by large companies do not trust their ability to achieve a leadership position despite wishing to have a career⁵⁰.

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 2024

⁴⁸ ISTAT Employed and unemployed people 2024 - 2025

⁴⁹ According to the INPS Social Report for 2023, men's gross average weekly remuneration in 2023 was Euro 643 on average, 28.34% higher than the average Euro 501 received by women.

⁵⁰ Bain & Company, 2021, 'L'Italia non è (ancora) un paese per donne' ('Italy isn't (yet) a country for women').

Many studies highlight the fact that reducing the employment gender gap and introducing effective policies allow to companies to obtain significant benefits. According to McKinsey, companies with over 30% women in their top management have greater likelihood of better financial performance⁵¹. Furthermore, greater diversity in leadership teams boosts involvement with stakeholders, improving ethics, involvement in the community and corporate image⁵².

Our commitment

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

ESG Goal

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	<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • First Telco company in the world to obtain an Equal Salary certification • UNipdr125 gender equality certification • Diversity Leader Europe 2024 for the fifth consecutive year according to Statista and the Financial Times • Wind Tre strengthened its partnership with the Gemelli University Hospital, Rome, and the ASSOLEI Association to promote the first anti-violence centre, at Gemelli Hospital. • Female manager rate of 27% • GENERATIONS 4 INCLUSION, a first initiative dedicated entirely to intergenerational teamwork on diversity and inclusion issues

Focus on diversity & inclusion

[GRI 405-1, GRI 405-2]

In 2024, 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.

⁵¹Diversity matters even more: The case for holistic impact', McKinsey, 2023.

⁵² McKinsey, 2023, see above

The **Diversity & Inclusion department** is responsible for leading the company towards achieving its objectives in terms of gender equality and social inclusion, establishing diversity and inclusion strategies and business plans, considering all the key aspects, such as gender, ethnicity, age, religion and affectional orientation, and through the “Disability Hub”, promoting improvement in working conditions for people with disabilities.

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 entirely dedicated to diversity and inclusion issues. These topics included gender parity, age and generations, parenting and caregiving, disability, LGBTQ+, and inclusive language and behaviour.

The winning projects related to the LGBTQ+ and inclusive language and behaviour areas, and these areas were addressed by the first two projects to be implemented, which were launched during 2023 and 2024.

In order to show our support for the LGBTQ+ community and increase awareness among colleagues on the topic, in 2024, **LGBTQ+ topics inclusion programme** continued through Wind Tre’s participation as corporate group in the annual Roma Pride parade, following on from its participation in Milano Pride 2023.

The project was promoted through internal and external communication activities to support awareness of the brand and the company’s positioning as an inclusive employer. Communication activities include the following:

- development of the “WE PROUDLY” section of the intranet, with new content: LGBTQ+ films, book and TV series selected by the Ambassadors;
- section of the intranet dedicated to Roma Pride and e-mail;
- media relations, LinkedIn communications and the corporate website.

In addition, between 2023 and 2024, the company embarked on a strategy to increase 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 is an initiative with a high impact on corporate culture that involved more than 300 people organised into 45 teams in an actual game made up of four challenges and various competitions in which the teams challenge each other to arrive at a definition of the Wind Tre Human Language Manifesto. Downstream of the process for gathering feedback from the team, in 2025, the Wind Tre Human Language Manifesto will be launched, to be followed by dedicated communication and awareness-raising actions.

The tables below show the incidence of women by contract level, which shows an improvement over time in women at Senior Manager level and confirms women at Executive level in 2024, in addition to the difference between male and female pay in the various offices and other gender diversity indicators.

Percentage of women by contract level [GRI 405-1b]	2024	2023	2022	2021	2020
White collar	52%	53%	52%	52%	51%
Supervisors	30%	29%	27%	27%	26%
Management	27%	27%	28%	28%	26%
Total	49%	50%	49%	49%	48%

Gender diversity [GRI 405-1 i, ii.] ⁵³	2024	2023	2022	2021	2020
Women on the Board of Directors	14%	14%	14%	17%	17%
> 50 years old	100%	100%	100%	100%	100%
Women on the Executive Committee	11%	11%	11%	14%	14%
> 50 years old	100%	100%	100%	100%	100%
Women in senior leadership positions	27%	27%	28%	28%	26%
30-50 years old	32%	34%	30%	43%	50%
> 50 years old	68%	66%	70%	57%	50%
Women hired	37%	43%	40%	43%	49%
< 30 years old	52%	56%	71%	65%	60%
30-50 years old	48%	42%	29%	29%	30%
> 50 years old	0%	2%	0%	6%	10%

Ratio of basic salary to male/female pay [GRI 405-2]						
Level	Rome	Milan	Pozzuoli	Ivrea	Palermo	Company Total (Including smaller sites)
3	1.01	1.00			0.99	1.00
4	0.97	1.04			0.92	1.01
5	0.98	1.02	1.01	1.00	1.00	1.01
6	0.96	0.98	0.97	0.96	1.01	0.97
7	0.93	0.96	0.93	0.96	0.87	0.94
Q	0.97	0.94	0.86	0.91	1.07	0.95

⁵³ Other types of diversity not significant.

Together against digital violence and beyond

As regards external initiatives, in 2024 Wind Tre's support of the **S.O.S. Lei Anti-Violence Centre** continued. The centre is located at Gemelli University Hospital, Rome. The Anti-Violence Centre, which was inaugurated in March 2023 by Wind Tre, in partnership with Gemelli University Hospital, Rome and Assolei Association, provides real support to women who suffer 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 is a place where humanity, proximity, assistance, and inclusion are guiding lights.

In March 2024, on the first anniversary of the centre's activity, and in November, to mark the International Day for the Elimination of Violence against Women, the Company planned an internal and external communication campaign to support women who ask for help and raise awareness of the topic of violence against women. The campaign involved:

- Participation in the conference organised by the Gemelli University Hospital on 21 November "Violence against Women, beyond the news";
- Media relations: releases and interviews;
- Account of the Company's commitment on the corporate site and LinkedIn;
- Dedicated internal campaign on the corporate intranet.

Raising awareness on the topic of violence, with a particular focus on violence in the digital world, also continued with an *ad hoc* partnership in partnership with *MA BASTA (Movimento Animato di Studenti Adolescenti - Animated Movement of Adolescent Students)* in the topics of **bullying and cyberbullying**. The protagonists of the project, which will end in 2025, are students at the Italian institutes and high schools, involving them in days of peer-to-peer dialogue and training on current themes, such as cyberstalking, cyberbullying and consensual sharing of images or videos.

In addition, since October 2024, Wind Tre has been committed to taking on women who have completed the process of escaping violence, to support their financial and professional independence, essential for tackling the phenomenon of economic violence. The initiative was implemented in association with the Human Age Foundation and Save the Children Italia.

Lastly, 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 people with disabilities

[GRI 3-3]



16%

percentage of the total of the global population who live with any form of disability
(*Global Survey Report on Persons with Disabilities and Disasters 2023*)

14%

SDG objectives regarding disabilities that are lacking or the progress in which have been stopped or reversed
(*UN Flagship Report on Disability and Development, 2024*)

32.5%

Employment rate of people with disabilities between 15 and 64 years of age in Italy
(*ISTAT, 2024*)

According to statistics, 16% of the world's population - equivalent to approximately 1.3 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. A recent United Nations report on disabilities and development⁵⁴ highlights the fact that progress for people with disabilities defined in connection with the SDGs are non-existent or insufficient in many cases. This indicates that many critical areas, such as education, employment and health require more targeted and sustained intervention. The UN document also shows that, although countries have involved people with disabilities more in decision-making processes, overall participation remains low.

According to the last ISTAT survey⁵⁵, in Italy, there are approximately 3.1 million people suffering limitations owing to their health, which is 5.3% of the population. And this percentage continues to grow, albeit slowly.

The snapshot provided by the Fourth Citizens and Disabilities Observatory by SWG, published at the end of 2024, tells us that although there has been some progress, inclusion of people with disabilities is still far from being achieved in Italy. One of the most concerning facts that emerged was that 71% of Italians do not feel that the State is doing enough to ensure the inclusion of people with disabilities. Furthermore, 68% of those interviewed believe that citizens themselves do not do enough to promote the equal participation of people with disabilities.

As regards employment, despite legislative initiatives that have been developed nationally, as shown in the aforementioned ISTAT report, in 2024, out of 100 people with disabilities aged between 15 and 64 years, only

⁵⁴ UN Flagship Report on Disability and Development 2024

⁵⁵ 2024 Annual Report

32.5% was in employment, against 58.9% of the entire population, 20% was seeking employment, while the public placement system is only able to place between twenty and thirty thousand people with disabilities per year. However, despite the numbers, which are anything but comforting, 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.

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 disabilities
- Offering people with disabilities a work environment that’s tailored to their needs
- Making our digital channels accessible to everyone

ESG Goal	Horizon	Ambition	Courses of action	The point we're at
Digital accessibility for people with disabilities	2025	Ensure that all the information provided by Wind Tre to its customers can be easily accessed by people with disabilities	<ul style="list-style-type: none">• Make the digital channels of the company fully accessible to people with disabilities• Make the Wind Tre social channels compliant with WCAG 2.0 AA guidelines• Expand our portfolio of offers to include solutions dedicated to people with disabilities	<ul style="list-style-type: none">• Make the corporate websites and social channels fully accessible to people with disabilities• Improve accessibility to Wind Tre’s social channels• Spread awareness of the topic of accessibility inside the company through training sessions and the integration of new processes• Internal Disability Hub for collecting reports and suggestions from employees• Special 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 touch points and main websites** managed by the company in 2024: Wind Tre, Very, Wind Tre Business, and Wind Tre Group. Each of these websites has been developed to make them **easier to read, understand and browse for users with disabilities**. The main activities and results in 2024 were:

- Based on the goal of maintaining the level of accessibility of web touch points above 90%, at the end of the year there was an average level of 92.8% and it never dropped below 92.5% throughout the reporting year⁵⁶;
- Two internal courses were provided on digital accessibility, with the overall involvement of 54 people.

For all the new digital initiatives, a paragraph on Accessibility was added to the requirements template, in order to ensure that the topic is considered right from the start of every project.

In 2025, the company is committed to focusing its efforts on its apps (WINDTRE and Very, iOs and Android), seeking to increase accessibility and gradually implement the actions anticipated, while continuing to monitor the level of accessibility of the digital touch points.

Dedicated services

WINDTRE provides customers who are deaf, blind, hard of hearing or with vision impairment or with severely limited mobility with the following dedicated services:

- **Start+ 5G Special Offer**, with 100Giga in 5G, unlimited national minutes and 2,000 text messages at a reduced price;
- **Unlimited Pro 5G Special Offer**, with unlimited Giga in 5G, unlimited national minutes and 2,000 text messages at a reduced price. In addition, Più Sicuri mobile Pro is included in the price. This option protects the customers' Smartphones, allowing them to browse safely using the WINDTRE network, and limiting access to potentially malicious sites.

Portfolio of solutions for users with disabilities

In 2024, in compliance with Resolution 290/21/CONS, supplemented by Resolution 281/24/CONS, WINDTRE extended the benefits already provided for customers who are blind, deaf and minors with disabilities to customers with "severely limited mobility". Those customers are now offered tariff concessions, as per Articles 4 to 8 of Resolution no. 290/21/CONS with no time limit, whereas in preceding years, these concessions were provided on a trial basis.

For users who are deaf or blind or who are hard of hearing or have low vision, the current offers and methods of activation remain valid, as is the special offer for under-14s. Users with severely limited mobility (a specified under Article 30, paragraph 7, of L. 388/2000) can subscribe to a dedicated service and activate it by calling 159 or at a Store, submitting the required documentation. In addition, WINDTRE has diversified its portfolio of Concessions according to the user's disability, as required by the Resolution.

As of November 2023, WINDTRE has also made a Super 5G Under-14s Special Offer available, for customers under 14 years of age who are deaf, blind, hard of hearing or with vision impairment or who have severely limited mobility. The offer includes 50 Gigas in 5G, unlimited national minutes and 2,000 text messages.

All the offers include a reduced price by comparison to the standard version sold on the market and a dedicated helpline, available by calling 159 or via WhatsApp on 3270000159.

⁵⁶ The indicator is measured using a third-party tool that checks the level of accessibility for visual disabilities and automatic screen reading in relation to corporate websites.

Internal initiatives

In 2019, WINDTRE introduced the figure of Disability Manager, who coordinates the Disability Hub, the corporate space specially dedicated to anyone who has a disability him or herself or who has someone close to them with a disability.

The Disability Manager promotes initiatives and projects to provide information and prevent direct and indirect discrimination, maintaining an ongoing dialogue with internal and external stakeholders on topics relating to disabilities. Through the corporate intranet, all Wind Tre personnel can contact the Disability Manager, sending reports or requests for support or information on topics linked to disabilities inside or outside the company.

In 2024, too, the company continued its commitment to supporting personnel with special social welfare needs for themselves or family members through the *'Al Tuo Fianco'* (At Your Side) initiative, which provides access to an expert on the public and private services available.

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 bureaucratic procedures, such as requests for care and disability allowances, and accreditation with the National Health System. A total of 22 workers took advantage of this service in 2024.

Lifelong digital learning

[GRI 3-3]



Euro 42.4 billion

Italian ICT market value in 2024, with 4.1% year-on-year growth

(Assintel Report, 2024)

46%

percentage of individuals of working age who have basic digital skills (just 22% have achieved an advanced level)

(2024 Digital Skills Observatory)

35%

Percentage of companies that has increased its digital training budget in 2024

(Assintel Report, 2024)

The ongoing digital transformation affects every aspect of our lives, and including the world of work, where digital skills are now essential.

However, the spread of basic digital skills in Italy is still in progress. According to the 2024 Digital Skills Observatory, fewer than half (46%) of all individuals of working age have digital skills, and only 22% have achieved an advanced level⁵⁷. This positions Italy in 23rd place in Europe for digital skills, approximately 10 points below the European average.

As regards company training, in 2024, approximately 35% of Italian companies increased the budget set aside for training their workers. This figure is a reflection of the importance attributed to ongoing training by Italian companies. Conversely, in 2024, the ICT market exceeded Euro 42 billion, and further growth of 4.6% is forecast for 2025⁵⁸.

Digital skills therefore play a crucial role in economic development. And the European digital literacy targets are ambitious. The Eu’s Digital Education Action Plan 2021-2027 seeks to create high quality, inclusive and accessible digital education. One of the aims is to bring the proportion of the population between 16 and 74 years with at least basic digital skills to 80% by 2030.

In Italy, two key pillars for the implementation of digital skills are the National Recovery and Resilience Plan (PNRR), which includes specific measures to improve the digital skills of the population and Public Administration personnel, and the National Strategy for Sustainable Development. The plans include measures for digital training, the adoption of advanced technologies and the improvement of digital infrastructures. However, full implementation of these strategies require time and an ongoing commitment on the part of all the parties involved.

In a nutshell, despite the fact that Italy is slowly making progress in improving digital skills, there is still much to be done to achieve the European objectives and ensure that all citizens and companies are able to fully benefit from an inclusive and truly impactful digital transformation.

Our commitment

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

ESG Goal

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 scenario by supporting their employment and investing in lifelong learning opportunities	<ul style="list-style-type: none">• To develop a digital mindset and upgrade the personnel’s skills to face the challenges of the future• To retrain the personnel and upgrade their skills based on the market’s needs• To promote a culture of lifelong learning and self-development• To promote the use of personalised training based on individual needs and aptitudes	<ul style="list-style-type: none">• Over 200,000 hours of training provided in 2024 alone• New Cybersecurity training programmes• Relaunch of Internal Facilities• Many training projects for new hires

⁵⁷ Digital Skills Observatory 2024 - Anitec-Assinform
⁵⁸ Assintel Report 2024

Continuous skill development

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

The topic of developing skills has always been a central focus for Wind Tre, which is why the company has a goal focusing on training in its ESG Plan. Wind Tre continues to invest in training as a key element that contributes to creating value both for the individuals and for the company, improving individual skills and contributing to the growth and success of the company.

Once again, the programmes dedicated to providing training in **technical, digital, regulatory, and language skills, technological development, and transversal skills** continued in 2024, 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 individual performance and the assignment of personal development plans. Progress with the assessment is constantly monitored to ensure completion of the performance review. In the last training course, 99% completion was achieved.

Wind Tre is part of the shareholder structure of the POLIMI Graduate School of Management

The company has been part of the shareholder structure of the **POLIMI Graduate School of Management** since 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.

Development of specialist skills

In terms of **specialist skills**, Wind Tre has identified certain key transformative training areas on topics such as CyberSecurity, Accountability, Artificial Intelligence, Project Management and many more.

In 2024, the **Technology Directorate** offered several training modules aimed at the **acquisition of new technological skills**, covering topics such as Mater 5G:

- Specific training to transfer specialist skills to allow technical trials to be conducted on poles and pylons for infrastructure maintenance activity of the Mobile Access sites; (Non-destructive testing);
- Microwave: courses relating to the design of radio links dedicated to network design personnel on a regional scale;
- Cassandra: Open-source database designed to manage large quantities of data. The training course is dedicated to the ICT Operations personnel;
- Testing Factory: a project created in 2023 relating to technical reskilling for organisational transformation in IT Development;
- 5G training: the aim is to facilitate the acquisition of the right skills to carry out one's tasks during the operation and daily and extraordinary maintenance of the network.

In 2023, a training course was launched on **Project Management** as a key skill for the present and future of various jobs in the company, for which tutoring was developed in 2024 and to complete the course, certification tests are planned.

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.

In addition, two new pilot projects were launched in 2024:

- Re-Start (in the A company tailored to Generation Z chapter);
- Network Field School: a program to recruit, hire and train young graduates with no prior experience, guaranteeing them a training programme and tutoring designed to allow them to acquire specialist technical knowledge and skills of the field technician role.

In 2024, the new **Cyber Factor 2** training project was launched, part of the **ongoing refresher training** focusing on **Cybersecurity**, directed at the entire company population. The initiative tackles essential topics that allow personnel to act **mindfully and safely**, both at work and in their private lives, also providing **guidelines** for the use of **corporate tools** and the **Internet**.

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 fourth 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 that began in 2023 with the aim of reflection, through regular virtual meetings with testimonials (university professors and writers), on four key words which characterise the transformation of our society and the company: autonomy, vulnerability, simplification and poverty.
- **Be Accountable Leader:** the aim of this initiative is to explore certain aspects of leadership and empowerment, developing an accountability culture and greater cross-functional cooperation, which is key to achieving corporate goals in an area like ours in continual transformation.

Cross-disciplinary skills

Until 2024, the ConversatiON digital platform has always been available for training on soft, transversal and language skills and open to all Wind Tre employees. From 2025 ConversatiON has been replaced with a new digital platform, leaving the mode of use/availability unchanged.

In 2024, a new e-learning course was provided focusing on **Copilot**, the generative artificial intelligence business tool available to all Wind Tre employees. An opportunity to develop new skills and keep up with the latest technological trends.

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 relation to the SA8000 theme, an e-learning course on corporate social responsibility was designed for the entire company population.

To add to these initiatives, new **Internal Faculties** were launched in 2024, providing training courses by Wind Tre personnel for Wind Tre personnel. The many courses managed internally as 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.

These include the following: **SecurityLab**, the aim of which is to provide the necessary skills to tackle increasingly complex challenges in the field of cybersecurity; **Finance Lab**, regarding the main Finance processes and systems; **Digital Accessibility**, a course designed to promote accessibility culture at work.

Skill4Future is a new Development and Training project designed and implemented for the Commercial Operations area. Created to enhance and increase skills, the goal was to map distinctive skills and then define and design customized training courses in line with future organizational needs.

Lastly, the **Sustainability & Quality Certification** department had implemented a project to promote corporate sustainability culture and the principles on which the ESG Plan is based. This is a story on sustainability with reference to the area in which the company operates and the various scenarios it has to face – from economic aspects to the matter of the company’s reputation – to give tangible form to the actions taken through the ESG Plan.

Training (hours) [GRI 404-1] ⁵⁹	2024	2023	2022
Total HR training (hours)	107,762	332,302	375,212
Women (average hours)			
<i>White collar</i>	15	50	50
<i>Supervisors</i>	21	55	72
<i>Management</i>	41	25	71
Men (average hours)			
<i>White collar</i>	16	54	62
<i>Supervisors</i>	21	58	69
<i>Management</i>	30	18	45
HR, Health and Safety training (hours) [GRI 403-5]	11,299	12,170	10,003
Total HR and HR, Health and Safety training	119,061	344,472	385,215

In addition to the data in the table, there were a further 83,719 training hours provided as part of the Wind Tre - Customer Operations - Quality Excellence & Process Compliance function, for a total of 201,569 training hours. (1,211 hours relating to the company Opnet, acquired during 2024, are excluded from this figure.)

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.

⁵⁹ The training data of the company Opnet covers the period from August 1st to December 31st, 2024

With regard to the integration of young graduates into the company, Wind Tre aims to further their personal and professional growth through specific training courses designed to improve their skills and strengthen their sense of belonging, focusing on their integration into the company.

The specially designed training course is called the **New Generation Program**, and is made up 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 five specific core 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.

In 2024, there was a **new version** of the training programme that involves a partnership between Wind Tre and **Telethon**, offering employees and new hire a unique and engaging experience as they learn the corporate values: Trust, Courage, Responsibility and Inclusion.

The participants in the **New Generation Programme** had the opportunity to enjoy two intense 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. Once again, this year, among the most exciting moments was the visit to the **Nemo Centre**, a centre for rare neuromuscular diseases, where the community had the chance to come into contact with patients and their families, listen to their stories and be inspired by the courage with which these people tackle their daily lives.

Following their onboarding, Wind Tre offers its young talent and some people managers the Future Leaders course, in association with top business schools. These include two courses:

- **JUMP** (third year), dedicated to young professionals.
- **STRIDE UP!** (third year), directed at the most talented People Managers to develop managerial skills and business expertise.

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

Investing in the Future of Young Talent and Sustainability

The ongoing focus on young graduates guides the company in the implementation of recruitment and training designed to make the most of young talent. Wind Tre recognises the importance of inclusion, backing specific courses to support and encourage women, creating a fairer and more dynamic working environment. The company has embraced projects to support and include young graduates, with no experience. Lastly, the company has begun working with foundations that promote access of refugees to the job market and to complete shared and participatory integration programmes.

February 2024 saw the launch of the **FinOps Hackathon**: young people with creative minds, from different university backgrounds (finance and STEM) came together in mixed teams, competing to put forward innovative practical solutions. FinOpsHack was not only a competition, but also an opportunity for the young participants to put themselves on the line in front of a jury made up of personnel from Wind Tre's HR, Talent Acquisition, Finance and Sustainability teams.

In 2024, with the **recruitment bootcamps**, Wind Tre involved 37 young graduates in full-immersion days, during which the participants had the opportunity to get to know the managers - key figures, who contribute

to the success of the company every day, with their experience and passion - and to find out about the company's commitment to sustainability.

It was a chance to inspire and involve young talent, showing them that working at Wind Tre means contributing to positive change.

In partnership with **Valore D** and selected by the Fondo per la Repubblica Digitale (Digital Republic Fund) — Social Company, the aim of the DigitHer project is to train and support 150 women aged between 18 and 34 years in digital professions.

The two courses offered, designed to support women entering the world of work as Data Engineers and Java Developers, allowing them to acquire abilities and technical, behavioural and soft skills. This inclusive training programme is experienced-based and intensive and is completed with a programme to support employment and empowerment in the digital sector. Through the DigitHer programme, one talented young woman was recruited and hired.

The **Network Field School** was structured and launched with a focus on young graduates with no work experience. The initiative was designed to bridge the generational gap in the Field Operation function and above all to create new drivers that continue to guarantee a high-quality network throughout Italy for Wind Tre customers. The Network Field School was founded to recruit, train and hire young people that have recently finished upper secondary school and have the desire and the curiosity to learn a highly qualified professional activity.

This training and tutoring programme allows recent school-leavers to acquire technical and specialised knowledge and skills in the role of Network Field Operator, experiencing the values and corporate culture of Wind Tre. This unique course led to the hiring of a talent pool of five people in various corporate offices, featuring more than 250 hours of **Phygital Training** with technical-professional content and on-the-job-training, shadowing senior field technicians. This has allowed young recent graduates to grow professionally, acquiring key technical skills regarding telecommunications technology and operations models, improve their soft skills and really experience the Wind Tre culture, with an aim to achieve full autonomy in the role in a short space of time.

This project is a concrete example of how the values of responsibility and trust are expressed by trusting each other, investing in new generations and in cross-generational influence.

Ready to RE-START

In 2024, a cross-functional project was launched called **Ready to RE-START**. This project has been keenly supported by the HR Department to foster the employability of people in vulnerable or disadvantaged situations, to offer concrete jobs opportunities and to encourage social inclusion.

The project involved the hiring one person in the Technology BU and has involved various phases. It began with the identification and **recruitment of refugees**, ensuring the right match between technical schools and positions vacant at Wind Tre. In parallel, a process was launched to raise awareness of the various stakeholders involved through a webinar with the UNHCR (United Nations High Commissioner for Refugees) in order to introduce people to the issue and provide them with the best tools to handle both the recruitment process and onboarding.

On Stage Programme

The **OnStage Internship Programme** is also dedicated to young people. In this initiative, students are paired with tutors, who assist them in the completion of a six-month internship in various 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 interns 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 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 course with greater awareness of the skills acquired during this intensive programme of personal and professional growth. The programme concludes with graduation day, when the interns and their tutor have a final opportunity to share feedback.

In 2024, the programme involved **33 recent graduates, 11 of whom were hired** on a permanent basis by Wind Tre at the end of their internship.

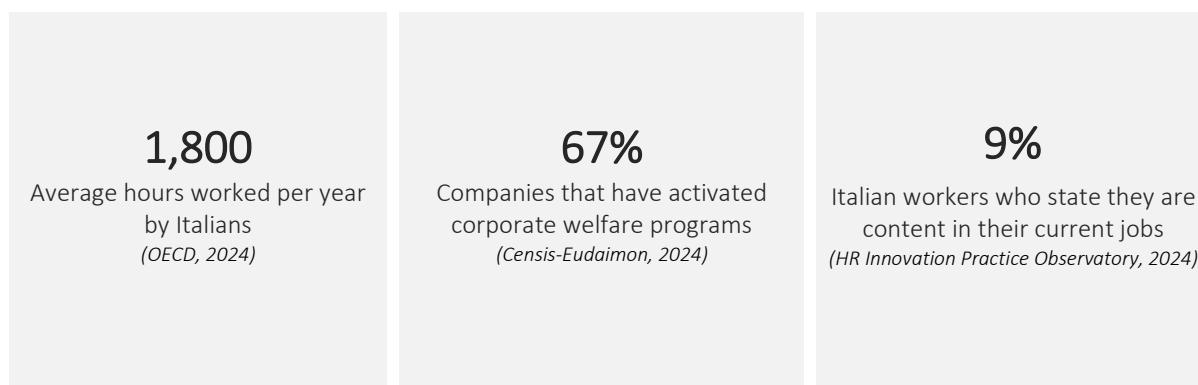
A Future of Opportunity: Membership of the National Youth Card Project

In 2024, Wind Tre joined National Youth Card Service (CGN), a tool created by the Department for Youth Policies and the Universal Civil Service to help implement young people's projects. The CGN card is a digital tool for young people aged 18 to 35 years, residing in Italy, which allows discounted access to goods, services, experiences and opportunities. With this partnership, Wind Tre offers training programmes and apprenticeships through the "job posting", and telephony offers at special low prices.

Relations and Activities with Universities

Over the course of 2024, the company embarked on and consolidated relationships with some of the most important Italian universities, taking part in their Career Days. Wind Tre organised Recruiting Days and career guidance events with students from the various institutions. These included: Bocconi and Jos (April 24), PoliMi Career Day (May 24), Rimini Career Day (November 24), STEM GIRLS Virtual Job Meeting (April 24), and Federico II Job Fair (May 24). In 2025, the company intends to maintain a strong focus on these topics.

Closer to Wind Tre people



The subject of well-being in the workplace has become more and more significant every year, both for employees and for companies, because it is a determining factor, not only for worker satisfaction but also for company productivity.

However, according to Milan Polytechnic's HR Innovation Practice Observatory⁶⁰, although more than half of Italian companies state that they strive to create an environment that is satisfactory for its employees, only

⁶⁰ [Milano Polytechnic's, HR Innovation Practice Observatory, 2024](#)

9% of workers state that they are content in their current jobs, considering the three areas of well-being: physical, psychological and relational. And just 5% state that they are “happy” at work. One worker in three has been absent from work over the last year owing to stress or anxiety, but only one company out of two offers services and support. In addition, unhappiness and not feeling well lead many to change jobs: 42% of Italians have done so recently or intend to do so in the near future. In 2024, for the first time ever, the main reason for changing jobs is to seek “physical and mental well-being” (36%) but seeking career opportunities and medium-long-term employability are also on the increase.

As highlighted in the seventh Censis-Eudaimon (2024) report, in the Italian job market a paradox has been created: on the one hand, a record number of employed people has been recorded, with an increase in steady jobs and a greater presence of women; on the other hand, there is a growing disaffection with work and an increasingly fragile relationship. We are witnessing a genuine critical socio-cultural transition, in which work is no longer the quintessential life activity around which everything else must be arranged.

Also, according to the data gathered by Censis-Eudaimon, companies have already adopted strategies to attract or retain workers: 33% has made remuneration more of an incentive; 55% has increased flexibility in working hours; and 67% has activated corporate welfare devices. These actions cater to the needs encountered by the companies, 59% of which have greater difficulty in recruiting new workers than in the past, and 50% of which have seen an increase in voluntary resignation.

The report concludes that corporate welfare must evolve to tackle the new employment market challenges and contribute to the overall well-being of workers. This includes the adoption of policies that foster work-life balance and respond to the needs of modern workers.

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, 2-8, 401-1a, 401-3 405-1]

On 31 December 2024, Wind Tre had 6,715 employees, 49% of whom were women. The proportion of female managers was 27%, roughly in line with previous years. Almost all employees have open-ended contracts and 83% have full-time contracts. 17% of employees work part-time, allowing a better work-life balance, and is mainly chosen by female employees.

Job Posting, the internal space that makes professional development easier

Internal transfers mainly take place through **Job Posting**, a tool available to all employees on the corporate intranet. Wind Tre Job Posting is a space that gathers together the various positions vacant in the company, in any branch in the country, and allows people to send their applications to be drive their own professional development. Hence personnel can take advantage of the opportunity to make the most of the experience they have gained and take a challenge to acquire new skills in different roles and working environments. The

process is always in line with organisational needs and business priorities, through a transparent recruitment process and subsequent transfer, which usually takes place within three months.

Regular surveys ensure transparency and ongoing improvement

For eight years now, Wind Tre has been conducting a regular **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 pillars of open and inclusive culture that is respectful of the opinions and identities of others. The survey is made up of **two annual times for listening**: in June and November, when more than 70% of the corporate population expressed their opinions. The results of the end-of-year surveys showed 84% strong engagement of the permanent staff and **more than 90% declared that they were proud to be part of Wind Tre and that they would recommend it as a great place to work**. Personnel feel fulfilled (76%) and that they have the necessary flexibility to create a work-life balance (90%). Inclusion is one of the company's strengths: approximately 90% of personnel feel that they are treated with dignity and respect and that they can express their opinions. Wind Tre business strategies inspire confidence, as confirmed by 80% of personnel, who believe that the multiservice strategy is an opportunity for the company and Wind Tre personnel feel they are “ambassadors” of the company.

Internal communication as a tool to ensure closeness

In addition to listening, internal communication is a tool to provide people with information and bring them closer in the most important company initiatives. Among the most popular initiatives is “Company Talks”, which communicates the main news and strategies to the entire company population with a combination of in-person attendance and direct online streaming.

The tables below show detailed information relating to the workforce.

Changes in the workforce (incoming) [401-1a]	2024				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	Central Italy	Northern Italy	South and Islands	Total
Women	19	20	3	42	21	39	4	64	20	31	1	52	40	12	0	52	8	9	3	20
< 30 years old	13	8	1	22	11	25	0	36	12	25	0	37	28	6	0	34	4	8	0	12
30-50 years	6	12	2	20	10	13	4	27	8	6	1	15	11	4	0	15	3	1	2	6
> 50 years	0	0	0	0	0	1	0	1	0	0	0	0	1	2	0	3	1	0	1	2
Men	24	45	4	73	37	47	2	86	24	47	8	79	45	19	6	70	7	12	2	21
< 30 years old	16	24	1	41	17	21	1	39	15	29	4	48	28	10	1	39	2	2	1	5
30-50 years	7	19	3	29	17	26	1	44	8	17	4	29	16	9	5	30	4	10	1	15
> 50 years	1	2	0	3	3	0	0	3	1	1	0	2	1	0	0	1	1	0	0	1
Overall total	43	65	7	115	58	86	6	150	44	78	9	131	85	31	6	122	15	21	5	41

61

Changes in the workforce (outgoing) [401-1a]	2024				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	Central Italy	Northern Italy	South and Islands	Total
Women	21	30	2	53	13	42	5	60	34	66	18	118	23	44	14	81	14	38	18	70
< 30 years old	3	7	0	10	1	11	0	12	3	10	0	13	1	4	0	5	0	6	0	6
30-50 years	15	17	2	34	8	25	2	35	17	37	13	67	14	30	12	56	9	23	18	50
> 50 years	3	6	0	9	4	6	3	13	14	19	5	38	8	10	2	20	5	9	0	14
Men	27	35	7	69	31	52	3	86	60	108	20	188	44	61	22	127	34	56	17	107
< 30 years old	4	10	2	16	4	9	0	13	2	14	0	16	2	4	0	6	2	4	1	7
30-50 years	6	15	3	24	13	13	2	28	25	46	10	81	13	21	7	41	18	26	10	54
> 50 years	17	10	2	29	14	30	1	45	33	48	10	91	29	36	15	80	14	26	6	46
Overall total	48	65	9	122	44	94	8	146	94	174	38	306	67	105	36	208	48	94	35	177

⁶¹ For the data on incoming and outgoing, the reference period for the company Opnet is from August 1st to December 31st, 2024

Distribution of the workforce by contractual level [GRI 405-1b]	2024		2023		2022		2021		2020	
	Total (no.)	%	Total (no.)	%	Total (no.)	%	Total (no.)	%	Total (no.)	%
White collar	5,847	87%	5,690	88%	5,740	88%	5,914	88%	6,008	88%
Supervisors	695	10%	648	10%	625	10%	627	9%	667	10%
Management	173	3%	162	2%	153	2%	152	2%	146	2%
Overall total	6,715	100%	6500	100%	6518	100%	6693	99%	6821	100%

Employees by age group with full time contracts [GRI 405-1b]	2024	2023	2022	2021	2020
< 30 years old	3%	3%	3%	2%	1%
30-50 years	50%	56%	66%	67%	67%
> 50 years	47%	41%	32%	32%	33%

Parental Leave [GRI 401-3b, c, d, e]	2024		2023		2022		2021		2020	
	Women	Men	Women	Men	Women	Men	Women	Men	Women	Men
GRI 401-3b Employees who took parental leave by gender.	211	70	220	17	231	19	231	17	247	23
GRI 401-3c Employees who returned to work after taking parental leave by gender	182	70	199	16	219	19	197	17	210	23
GRI 401-3d Employees still at work one year since the end of parental leave	n.a.	n.a.	212	15	200	16	215	17	231	23
GRI 401-3e (return to work)	86%	100%	90%	94%	95%	100%	85%	100%	85%	100%
GRI 401-3e (retention)	n.a.	n.a.	97%	79%	102%	84%	102%	74%	76%	79%

62

Distribution of employees by contract duration (no.) [GRI 2-7a]	2024			2023			2022			2021			2020		
	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Open-ended	3,430	3,276	6,706	3,278	3,220	6,498	3,295	3,219	6,514	3,406	3,287	6,693	3,516	3,301	6,817
Fixed-term	8	1	9	0	2	2	2	2	4	0	0	0	2	2	4
Total	3,438	3,277	6,715	3,278	3,222	6,500	3,297	3,221	6,518	3,406	3,287	6,693	3,518	3,303	6,821

Distribution of employees by contract length, by geographical area (no.) [GRI 2-7b]	2024				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	Central Italy	Northern Italy	South and Islands	Total
Open-ended	2,267	2,372	2,067	6,706	2,172	2,347	1,979	6,498	2,168	2,366	1,980	6,514	2,228	2,458	2,007	6,693	0	1	3	4
Fixed-term	2	7	0	9	0	2	0	2	3	1	0	4	0	0	0	0	2,299	2,512	2,006	6,817
Total	2,269	2,379	2,067	6,715	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]	2024			2023			2022			2021			2020		
	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Full-time	3,308	2,282	5,590	3,127	2,177	5,304	3,130	2,116	5,246	3,202	2,122	5,324	3,316	2,107	5,423
Part-time	130	995	1,125	151	1,045	1,196	167	1,105	1,272	204	1,165	1,369	202	1,196	1,398
Total	3,438	3,277	6,715	3,278	3,222	6,500	3,297	3,221	6,518	3,406	3,287	6,693	3,518	3,303	6,821

Full-time employees and distribution by gender and geographical region [GRI 2-7]	2024				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	Central Italy	Northern Italy	South and Islands	Total
Women	821	773	688	2,282	791	758	628	2,177	776	741	605	2,116	772	762	588	2,122	765	764	578	2,102
Men	1,251	1,280	777	3,308	1,177	1,248	702	3,127	1,176	1,257	697	3,130	1,203	1,306	693	3,202	1,261	1,342	713	3,316
Overall total	2,072	2,053	1,465	5,590	1,968	2,006	1,330	5,304	1,946	1,998	1,302	5,246	1,975	2,068	1,281	5,324	2,026	2,106	1,291	5,423

Part-time employees and distribution by gender and geographical region [GRI 2-7]	2024				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	Central Italy	Northern Italy	South and Islands	Total
Women	174	282	539	995	179	295	571	1,045	197	315	593	1,105	215	326	624	1,165	237	338	621	1,196
Men	23	44	63	130	25	48	78	151	28	54	85	167	38	64	102	204	36	69	97	202
Overall total	197	326	602	1,125	204	343	649	1,196	225	369	678	1,272	253	390	726	1,369	273	407	718	1,398

2 - 8 Agency workers	2024	2023	2022	2021	2020
Agency workers	125	108	108	93	90

63

Diversity and equal opportunities [GRI 405-1 biii [art.1 e art.18 ⁶⁴]]	2024	2023	2022	2021
Vulnerable categories	4.0%	3.8%	3.7%	3.5%

⁶² For the data in the table, all absence codes relating to maternity leave (early, compulsory, optional 6 months and optional hand) and apply the criteria required by GRI 401-3. Employees who took parental leave in year XXXX and this leave was interrupted before the end of the same year (31/12/XXXX) are considered to have returned to work. Employees were considered in this cluster who are still active (not terminated) workers 365 days after the last day of parental leave (this data is not available for the year 2022).

⁶³ Sales staff, whose working hours are typically part-timers 60%, mainly fall into the category of agency workers. On average, there are no variations in the number of agency workers due to seasonality.

⁶⁴ Protected categories art.1 and art.18.

Top Employer Italia for the seventh consecutive year

Seven consecutive years of being certified by the Top Employer Institute bear witness to Wind Tre's ongoing commitment to people, their development and fulfilment, including in terms of their work/life balance through the "Human Working" model.

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. Through 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%, 19.1% higher than the average of the 151 certified Italian companies.

Overall, Wind Tre received a score of 89.78%, 5% higher than the average of certified Italian companies.

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 its company page.

#Human Working

After listening to the needs of the company's personnel, through a survey that highlighted their desire to extend the flexible working methods beyond the pandemic, in 2021 Wind Tre created a model based on **"why"** one should return to in-person working, rather than on **"how much"** one should return to in-person working.

Sanctioned by an innovative trade union agreement, and recognised by the **'Top Employers Institute'** as an **Italian HR Best Practice**, smart working at Wind Tre is not only supported by the provision of technological tools, but also by training activities and a good conduct card (the 'We-etiquette'), which is intended to encourage remote working, while respecting the work-life balance and the right to disconnect.

Caring for people

[GRI 401-2, GRI 2-19, GRI 2-20]

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

Parenting support initiatives

- **Reimbursement of school fees** incurred by employees for attending any nursery or children's school anywhere in Italy, with the amount of financial contribution related to the job level of the parent and the school attendance time of the child (short, medium or long). **121** children were included in the list for 2024.
- Reimbursement of a part of the fee for **summer camps** attended by children aged between 6 and 12 years, up to a maximum of three children per employee
- **School Voucher** for the purchase of schoolbooks, which is repaid in six interest-free instalments, deducted directly from the employee's pay packet. The loan was used by **230** employees in 2024
- **#schoolreward**, a grant awarded to children who achieve exceptional results at lower and upper secondary school. This initiative was further improved in 2024 with a view to ensure greater inclusion, allowing a total of some 470 girls and boys to receive the reward in 2024
- deals with **Multiversity Group** to take advantage of a 50% reduction on annual fees at online universities **Pegaso, Unimerctorum and SanRaffaele**
- deal with **Esselunga** for the purchase of books and school supplies at a reduced cost,
- deal with **GoStudent** to take advantage of online tuition at discounted prices.

Initiatives to support those in need of social welfare support

In 2024, the company 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.

Wind Tre per Noi

Through the **Wind Tre per Noi** platform, Wind Tre employees have access to a series of benefits that they can utilise on a daily basis, such as consultancy services, temporary online shops, and special deals for all sorts of products all over the country. In 2024 a new Corporate Benefits platform was launched with discounts and promotions, in addition to the existing VIP District platform.

In October 2024, Wind Tre launched a trial support platform "LianeCare". The platform allows employees to find a match between their care personal or family support needs and a qualified professional who can meet those needs (e.g., nanny, nurse, cleaner, dog sitter, etc.). In addition, the platform offers a wide range of fee

e-learning courses to tackle the most important topics in life (such as first aid, stress management, child nutrition, difficulties at school, ADHD in children, bullying and cyberbullying, emotional dependency, relationship crises, etc.). Whether the service becomes a permanent feature will depend on the level of satisfaction of the people who use it.

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 offered initiatives again in 2024 developed to **combine the maintenance of physical health with the pleasure of spending time together**. 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 (until May). At the new Milan headquarters, Monterosa91, a modern and well-equipped gym opened in June 2024. In addition, in partnership with WellHub (formerly 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 office also has changing rooms and showers to make it easier for employees to get active.

Contract benefits

Contract benefits are awarded to all employees, regardless of the office where they work, job level and type of contract⁶⁵

- 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 fixed and mobile telephone services, electricity, gas and Netflix
- Contractual facilitations (e.g. paid hours of leave for medical appointments)
- Consultancy: taxes, social services
- Allocation of company car for mixed use: for executives, technicians and salespeople.

The approval gained by the **welfare plans** of previous years again prompted the company in 2023 to allow employees to transform the performance bonus⁶⁶ 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** project, associated with the Wind Tre Total Reward Statement.⁶⁷

⁶⁵ The only exception is the Telemaco supplementary pension, which is not available for employees on fixed-term contracts.

⁶⁶ 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).

⁶⁷ The **Total Reward Statement** is an individual document that clearly and systematically describes all the elements that make up an employee's compensation package, including not only monetary elements but also all non-monetary benefits that the Company offers in the form of insurance, healthcare, welfare, and training.

The process of rewarding

[GRI 2-19, GRI 2-20]

The overall reward plan (fixed and variable remuneration) provided 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 rewards concept on the basis of 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.

The shareholder manages changes in CEO remuneration directly and informs the HR Department, so they are applied.

Special entry bonuses are also provided 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 being in service at the time of disbursement).

Redundancy incentive packages are calculated by taking into account the monthly salaries provided 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” specification (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 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.

Variable remuneration (short-term and long-term incentives) of senior executives is linked to the achievement of financial, business, operational, and sustainability goals. The sustainability target is an indicator composed of several KPIs relating to the environment and people that are part of the company’s 2030 ESG Plan, making up 15% of the total overall. Included in this are the KPIs relating to decarbonisation and gender equality to support women’s empowerment, including in senior roles.

For all other employees, the remuneration policy is managed by Human Resources Department and departmental managers (subject to the approval of the CEOs and within the prescribed budget limits).⁶⁸

Occupational health and safety

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

Ensuring occupational health and safety⁶⁹ is a priority for Wind Tre, which has set up a dedicated internal management system which complies with the most widely recognised international standards (ISO 45001). With this system, the company aims to go beyond its legal obligations through the implementation of even

⁶⁸ As regards Opnet, following the acquisition that was completed in August 2024, an integration plan was launched. The plan starts in 2025 and will progressively involve the harmonisation of all the policies, procedures, benefits and various institutions for all employees.

⁶⁹ The occupational health and safety of employees’ certification applies only to Wind Tre S.p.A.

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 continued in 2024 for all aspects that require practical tests (e.g. first aid, fire prevention etc.). Overall, 1,230 employees were effectively trained in occupational health and safety in 2024, for a total of 11,201 hours of training.

As in preceding years, in 2024, no fatal accidents were recorded, nor accidents with serious consequences, and no there were no reports of work-related ill-health among Wind Tre employees or for service company employees that work at Wind Tre sites.

Twenty-one accidents were recorded in 2024, seven while commuting and fourteen at 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;
- All possible and foreseeable human factors;
- Risks that may originate outside the workplace during the course of activity under the control of the company;
- Workplace infrastructure;
- 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. Calculation of the accident frequency rate is based on millions of hours worked:

Accident frequency rate	2024	2023	2022	2021	2020
Employees (during work)	1.34	0.7	0.8	0.6	1.4
Employees (during travel)	0.67	0.6	0.2	0.3	1.0

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]



43.8%

The percentage of energy in Italy covered by renewable sources in the first six months of 2024
(Terna, 2024)

14%

Impact of greenhouse gas emissions generated by digital industry on the total in 2040 (estimate) (Nature, 2024)

62 million

The tonnes of waste generated worldwide by electronic devices in 2022
(Global E-Waste Monitor, 2024)

2024 was confirmed by the Copernicus Climate Change Service - C3S as the hottest year on record globally and the first calendar year in which the average global temperature exceeded pre-industrial levels by 1.5°C. Over the course of the year, extreme weather events were observed all over the world, from strong storms and floods, to heat waves, droughts and wildfires. The increase in the frequency and intensity of these events is a significant risk for the livelihood of people all over the world. In addition, starting from July 2023, for 19 months on 20, temperatures over 1.5°C hotter than pre-industrial levels has been recorded.

Whereas the Paris Climate Conference, also known as COP21, had set the main objective as limiting the increase in average global temperature well below 2°C above pre-industrial levels, with the commitment to continue efforts to limit it to 1.5°C, the worsening of the situation led the last conference (COP 29) to take a decision on the New Collective Quantified Goal, establishing that developing countries are also called upon to contribute to climate finance, if they are able to do so. It will therefore be easier to push countries like China and Saudi Arabia, which have the ability to contribute, to play their part, increasing the resources available for combating climate change.

In this context, the concept of Green ICT emerges as a key catalyst for reducing the environmental impact of information technology and steering companies towards more sustainable practices, which can no longer be

put off. On the one hand, digital industry is expected to contribute 14% of global greenhouse gas emissions in 2040, therefore making it necessary to take action to reduce that level. On the other hand, the ICT sector must provide the means to reduce the emissions of other sectors, guiding them, in the role of enabler, in what has already been recognised as a central process on the path to climate neutrality: Twin Transition, green and digital.

In this scenario, it is important to consider the impact of e-waste on decarbonisation. The improper treatment of electronic waste contributes to greenhouse gas emissions because many devices contain dangerous materials which, if not managed correctly, can release harmful substances in the environment. According to the Global E-Waste Monitor 2024, in 2022, 62 million tonnes of e-waste were generated globally, with 82% increase on 2010 and this increase is expected to continue by 2030 reaching 82 million tonnes. In addition, in 2022 it appeared that just 22.3% of that waste was formally documented as collected and recycled sustainably. This low rate of recycling means that a large quantity of precious and rare materials are wasted, increasing the need to extract new resources, with the resulting further CO₂ emissions.

CO₂ emissions are the most significant of all climate-altering emissions. The best way to measure the CO₂ emissions attributable to an organisation is to break them down into three segments (Scopes):

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

The environmental impact of the telecommunications industry 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
- Making an active commitment to reducing the CO₂ emissions generated by our infrastructure and services offered
- Modernising our nationwide network, to ensure continuous improvement in terms of energy efficiency
- Reducing waste and providing a sustainable working environment
- Providing our customers with solutions to help them be more efficient and sustainable Increasing awareness and engaging our supply chain on the path to decarbonisation

ESG Goal

Goal	Horizon	Ambition	Courses of action	The point we're at
100% carbon neutral	2030	To eliminate our CO ₂ emissions (scope 1 and 2) by 2030	<ul style="list-style-type: none">• A gradual increase in the purchase of green energy	<ul style="list-style-type: none">• By the end of 2024, we had reduced our CO₂ emissions by around 38% in comparison with 2020

- Continuous modernisation of the radio access network to ensure **maximum energy efficiency**
- Upgrade of the company car fleet to include low emission vehicles
- **Offsetting** of residual CO₂ emissions
- **Energy Supervisor**: an ICT solution for the digital management of energy consumption and expenditures
- **More than a third** of the company car fleet made up of **hybrid and electric cars**
- Installation of **61 charging points** for electric or plug-in hybrid cars

Zero emissions goal

[GRI 2-4, GRI 305-1, GRI 305-2, GRI 305-3, GRI 305-4, GRI 305-5, GRI 203-1, GRI 302-1]

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

Due to the widespread nature of the network, it is **mainly supplied with energy purchased from the national grid**. 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 combating climate change while continuing to ensure high infrastructure performance. With a view to this, 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 2024, the plan had brought about a **38% reduction in climate-changing emissions in comparison with 2020** (the Wind Tre ESG plan's base year and CKHGT's decarbonization target).

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) ⁷⁰	2024	2023	2022	2021	2020	GRI
Consumption of fuel from non-renewable sources	113,016	108,310	109,249	125,547	98,065	GRI 302-1 a
Consumption of self-produced electricity from renewable sources	1,260	1,260	1,243	1,260	1,260	GRI 302-1c
Electricity consumed	2,670,571	2,659,864	2,681,851	2,592,447	2,484,061	GRI 302-1c i
<i>Of which from renewable sources (Guarantees of Origin)</i>	1,248,210	987,756	919,330	436,931	1,260	
Total	2,783,587	2,768,174	2,791,100	2,717,994	2,582,125	GRI 302-1e

⁷⁰ Other types of consumption are not applicable (GRI 302-1b ciii, civ, and d).

Greenhouse gas emissions (tonnes of CO ₂ eq.)	2024	2023	2022	2021	2020	GRI
Direct (Scope 1)*	9,889.6	9,820.16	8,111.65	10,321.70	10,107.78	GRI 305-1 a-b
Of which air-conditioning gas	2,790.24	2,959.19	1,071.93	2,700.53	3,833.77	
Indirect market-based (Scope 2)*	197,839.20	212,383.96	223,548.61	273,382.17	323,929.75	GRI 305-2b
Total Scope 1 and 2 (including refills *)	207,728.57	222,204.12	231,660.26	283,703.87	334,037.53	
Carbon intensity (tonnes of CO₂eq./TB)	0.015	0.018	0.022	0.030	0.041	GRI 305-4

*: Data on biogenic emissions (Scope 1) [GRI 305-1c] are not applicable. Indirect location-based emissions for 2024 were 191,704.3 tonnes CO₂eq. [GRI 305.2a]. Data on emissions associated with air-conditioning gas refills are only available as of 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. In addition, Wind Tre supports the parent company in achieving the Scope 3 emissions reduction target.

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 category⁷¹.

Greenhouse gas emissions (tonnes of CO ₂ eq.)	2024	2023	2022
Scope 3*	523,386	545,706	576,375

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

Confirming its commitment to better energy use and reducing climate-changing gas emissions, as mentioned above (see the chapter entitled 'More Responsibility'), in 2024, Wind Tre S.p.A. maintained two specific certifications in its integrated management system. Wind Tre 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, and greenhouse gas emissions control system according to international standard ISO 14064. 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.

Energy efficiency projects

[GRI 302-1]

Following the creation of the unified Wind Tre brand, in 2017, the company 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.

⁷¹ For further information, see the paragraph entitled 'Calculation criteria'

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, adding a further 5,000 plants through the acquisition of Opnet in 2024, which are capable of providing 2G, 3G, 4G, 5G and NBloT services. These latter features are constantly being tested and optimised. **The radio base stations**, and the large plants have been equipped with **Free Cooling** systems, which use external air to cool the equipment, thus reducing the air conditioning units' energy consumption and extending their life cycle.

Having completed the modernisation and increasing the efficiency of the entire radio-mobile access network, the company launched an ongoing **Energy Efficiency Program**, which involves all of the company's technical structures. In 2024, Wind Tre promoted and implemented numerous energy efficiency projects, with an aim to avoid consumption of more than 15 Gwh of electricity in 2024.

Among the projects implemented, an automated tool was developed and refined that 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, an Internal Energy Audit was launched and conducted, which monitored and improved the energy efficiency of many of the technological sites with work on infrastructure that allowed a significant reduction in the energy requirements for cooling systems.

In addition, the ongoing renewal of the Wind Tre network, has allowed the replacement of numerous energy stations, adopting more technologically advanced and higher performance systems.

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 CO₂ emissions.

In 2021, to celebrate the achievement of the emission reduction goals agreed as part of the partnership, **Progetto Oasi** (the 'Oasis' project) was created. The aim of the project is to support the conservation of protected areas; Wind Tre symbolically gifted 2 m² of land situated in the three WWF oases closest to the company's 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.

Over the years, the Oasis Project has allowed Wind Tre personnel and their families to visit the oases of Macchiagrande (Rome), Vanzago (Ivrea) and Astroni (Pozzuoli). In addition, initiatives have been launched to involve employees' children in making the younger generation aware of topics relating to the environment and the protection of biodiversity which have led, in particular, to the creation of an illustrated volume of which some extracts are reported on this page. Thanks to the partnership in 2024, all Wind Tre personnel had the opportunity to book a guided tour of one of the three WWF oasis in Oropa (Biella), Monte Arcosu (Cagliari) and Capo Rama (Palermo). The WWF oases are a complex and varied system of protected areas. They are natural areas where visitors can discover how essential it has become to safeguard biodiversity, especially over recent years, when the challenges of land consumption and climate change have become increasingly urgent.

This project is in addition to those of previous years relating to the creation of urban forests in recent years, conducted through a partnership with the Arbolia benefit company. At the end of 2021, **an urban forest was**

created with more than 1,000 trees in the city of Taranto, whereas in 2022, another urban forest with more than 1,800 trees was created in Treviso.

Lastly, every 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, inviting people to turn out their lights for one hour. The aim of this symbolic gesture is to raise awareness of citizens, cities and companies all over the planet of the urgent need to take action to express the shared commitment to overcome the challenge of climate change and given the world a more sustainable future. 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 promotes various initiatives for **improving sustainability in the workplace** and reducing waste. These include the following:

- Installing automatic on/off systems for lights inside the technical rooms and offices
- The replacement of neon lights in all company offices will continue throughout 2025
- Sharing offices using smart working methods in order to alternate between in-person presence at the office and working from home
- Closure of an entire wing of the Rome headquarters to achieve an increased energy saving
- The selection of a new site for the Milan offices at the polyfunctional Monterosa91 complex, a building with high energy efficiency and sustainability standards
- Monitoring the Rome headquarters using AMA ecology ratings and installing ecoboxes at all of the company's 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

In June 2024, Wind Tre inaugurated its new office space at the Monterosa91 complex in Milan. The space was conceived to make the most of the relational component of the Human Working model and designed to encourage cooperation and sharing. The building is light, transparent and immersed in greenery, with the highest energy efficiency and sustainability standards.

In 2024, Wind Tre extended the office water consumption reporting scope to include further operational sites, installing new meters and continuing to implement toilet efficiency and wastewater recovery from the air-conditioning towers projects. At the Rome office, the recovered water is used for irrigation. Total water consumption in 2024 was 24,919 cubic metres.

To facilitate sustainable mobility, Wind Tre has 90 shared cars (carpooling), some of which can be booked through a corporate car sharing app. This service is available at the company's main offices in: Ivrea, Milan, Marghera, Rome, Pozzuoli, Turin and Palermo. In total, by the end of 2024 the company car fleet included 542 electric or hybrid cars, including carpooled cars. Furthermore, at the company offices in Milan, Rome, Mestre and Pozzuoli, a total of 61 electric or hybrid car plug-in recharging points were installed.

In 2025, further activities are planned at the various company sites:

- replacement of the led lamps at the Ivrea and smaller sites, design and renovation of the Pisa and Ancona sites
- For the electric company cars, the positioning of the recharging points at the new Milan MR91 site and the installation of wall boxes at the smaller sites, and the beginning of renovation work in the interiors of the Rome headquarters
- installation of air-conditioning monitoring systems at the smaller sites

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.

More sustainable and smarter stores

Wind Tre has continued to develop **automation on its distribution network with an aim to increase the environmental sustainability of its stores.**

Following on from the activities launched in previous years, the newly opened shops are equipped with **digital signage**, LED lighting and IOT devices that monitor air quality and the efficiency of the air renewal systems for the reduction of energy consumption.

Wind Tre has completed a technological and evolutive upgrade of the **digital signage** platform, switching from the on-the-premises to cloud mode. This activity has made visual communications inside and outside of the Wind Tre stores even more effective. All the monitors are synchronised and transmit consistent and aligned offer and product contents. Through this new method of communication, the use and sending to the distribution network of paper materials has been reduced even further.

The progressive introduction of branded electricity and gas and insurance elements has also allowed Wind Tre to avoid the use of paper materials and window decals.

In 2024, use of the **OTP (One Time Password)** via text message has also increased to allow digital signing of documents and thus further reducing paper consumption.

Over the course of the year, distribution of the **SMART SCANNERS** was completed. These devices make it unnecessary to photocopy customers' documents or to keep paper copies of contracts. The app is up and running, allowing cases that cannot be managed with the physical scanner (e.g., in the event of remote activations) to be completed through the app.

These three tools: **digital signage**, **OTP** and **SMART Scanner** are contributing to the corporate **zero paper** initiative, launched in 2024, the aim of which is to reduce the use of paper to zero.

Green logistics

With a view to reducing environmental impact as regards transport and logistics, Wind Tre has been employing DHL's services for many years, a global leader in the sector with a clear green logistics strategy. In 2024, this partner achieved the Gold rating on the EcoVadis platform and has set itself the target of reducing its emissions to zero by 2050.

DHL's commitments in relation to Green Solutions for Sustainable Logistics are in line with Wind Tre's own objectives:

1. **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 by means of centralised reporting on (Scope 1, 2, and 3) CO₂ emissions
2. **Reduced environmental impact** - DHL offers a series of sustainable service options to reduce to a minimum and/or avoid environmental impact throughout the supply chain (e.g. reduction of the generation of waste, ensuring recovery, optimisation of the transportation network, minimisation of energy resource consumption and reduction of single-use plastics, etc.). These solutions show potential for further savings on the part of Wind Tre
3. **decarbonisation** - Dedicating investments to projects for the reduction of emissions with internationally recognised targets (SBTi: reducing emissions to zero by 2050, with intermediate targets of Carbon Neutral Warehouses by 2025 and the reduction of Scope 3 emissions by 25% by 2030).

DHL's Sustainable Logistics approach has resulted in a number of important actions. These include, at the Liscate warehouse, also used for Wind Tre, the implementation of one geothermal plant and one photovoltaic plant, which has allowed the company to speed up its obtaining Carbon Neutral Building status, and the completion of the Green Carrier Certification programme, for the purpose of selecting increasingly sustainable transportation suppliers and involving them in its strategy. The company has a mindful environment and 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]



30%

Reduction of net CO₂ emissions by 2030

This can be achieved with the implementation of smart technologies in cities (*World Smart Cities Outlook, 2024*)

\$150 billion

Estimated annual global added value by 2030, through the adoption of circular business models, supported by AI (*World Economic Forum, 2024*)

70%

Percentage of targets linked to the SDGs that may be accelerated with digital technology (*ITU and UNDP, 2023*)

The numbers tell us the increasing importance that digitalisation will have on the global economy. However, in addition to transforming governments, economies and societies, digital transformation has the potential to

play a key role in the achievement of the Sustainable Development Goals. According to the “SDG Digital Acceleration Agenda”, drawn up in 2023 by the International Telecommunication Union (ITU), innovative digital solutions can accelerate progress in climate action, education, inclusion, and the eradication of famine and extreme poverty, with potential progress in at least 70% of the 169 SDG targets.⁷²

Against this backdrop “smart technologies” - the technologies that use data to improve efficiency, security and quality of services - will increasingly be key. The World Economic Forum, highlights, for example, how the adoption of circular business models, supported by AI, can create significant economic advantages, estimating that AI could contribute to generating a global added value of \$150 billion by 2030, through the optimisation of production processes and improvement of management resources⁷³. And through the implementation of smart technologies in cities, it is estimated that a 30% reduction in CO2 emissions could be achieved, as a global average, already by 2030⁷⁴.

Smart cities are an urban development model that integrate advanced technologies to improve sustainability and quality of life, through solutions to monitor and optimise the use of energy in real time, for example, or smart mobility solutions, such as optimised public transport systems. In Italy, the number of smart cities is constantly growing, with cities like Milan, Bologna and Florence leading change.

New technologies are therefore an important lever for promoting environmental sustainability and improving quality of life. However, it is essential to tackle the environmental and social challenges linked to digitalisation to ensure a fair and sustainable future. Cooperation between governments, industries and citizens will be crucial to fully exploit the potential of smart technologies and build a more resilient and inclusive society.

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

ESG Goal

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	<ul style="list-style-type: none">• Screening relevant cities and their needs, identifying potential solutions and verification by means of a technical and economic feasibility study (POC - Proof Of Concept)• Contact with local PAs, round tables with consumer associations and PAs, participation in local innovation hubs (such as CTEs), and sponsorship of relevant events	<ul style="list-style-type: none">• Establishment of memoranda of understanding aimed at supporting local governments to support them in the digital transition: 41 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

⁷² “SDG Digital Acceleration Agenda”. International Telecommunication Union (ITU), United Nations Development Programme (UNDP), in association with the Inter-American Development Bank Group (IDB) and Boston Consulting Group (BCG), 2023

⁷³ The circular transformation of industries: Unlocking economic value- 2024

⁷⁴ World Smart Cities Outlook, 2024

- **Educational programmes** to support Public Administrations in introducing new technologies and skills such as 5G, data analytics and IOT cloud solutions
- The new **Smart City Transformation Academy** meetings
- **Support of CTE** (Emerging Technology Homes) and **Campania Digital Innovation Hub (DIH)**
- **Support for local government administrations** at major events: Modena Smart Life, Turin Popular Digital Festival, “Mind the Gap” convention in Matera and Caserta, City Vision in Padua and Milan

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 2024 Wind Tre has continued on its path to consolidation of 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 energy efficiency, schools and improving mobility and tourism services.

In the context of the **‘Smart partner of 100 Smart Cities’ project**, which is part of the company’s ESG plan, the company has defined a cooperation 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. In 2024, the company signed **16 new memoranda of understanding**, which, in addition to the 25 already signed in the 2022-23 period, bring the total Italian cities that belong to the network to 41. The project involves the spreading of skills and joint trial of services, such as tourism and mobility analysis, increasing energy efficiency and digital communication with citizens, such as streaming council meetings and mass alerts in the event of critical events.

To support the spread of awareness of the Smart City project, in 2024, Wind Tre has published a press campaign in the major Italian newspapers, like Repubblica (in the Guide and Affari e Finanza insert), Corriere della Sera (in the Economia insert) and Il Mattino.

In 2024, Wind Tre continued its work with local institutions, confirming its closeness to public administrations and their representatives, in order to extend, strengthen and modernise their digital infrastructure. Elements like big data, analytics, IoT and 5G network are enabling factors for a multitude of services that can improve the environment, healthcare and security and the quality of citizens in general. 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).

Solutions in practice

With the aim of supporting the Municipality of Florence in strategic decisions relating to tourism, transport and communication, Wind Tre has provided the administration with the Big Data Analytics solution which, through an interactive dashboard, allows you to:

- Monitor detailed socio-demographic characteristics of visitors (age, gender, place of origin, etc.) and both local and international tourist flows, analysing affluence and nationality
- Obtain a clear vision of most travelled routes and means of transport used most in the areas of interest, thus improving public and private logistics planning through the analysis of the routes of movement in the area
- Identify the areas with greatest return on investment for advertising, allowing monitoring of the effectiveness of campaigns.

In 2024, there were three steps in the **‘Smart City Transformation Academy’**, a free digital education initiative developed in association with Forum PA. Over the course of the year, there was an extension of participation in the Academy, launched by Wind Tre as part of the Smart City project in 2023. The Academy now reaches beyond the local governments involved in the project, also including administrations of other municipalities interested in Smart City topics, universities and local companies.

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

For 2025, in addition to the “Smart City Transformation Academy”, the launch is planned of the Executive Education training programme on digital transformation designed for Municipalities’ IT Managers. The programme has been created as part of a partnership with Bocconi and Aused, the Italian association of IT managers.

At the forefront of the spread of an open and inclusive digital culture Also in 2024, the company considered participation in the various activities designed to promote the use of the innovative technologies described above as a priority. The purpose of this was to stimulate greater closeness to an increasingly broad and inclusive digital culture. Once again, Wind Tre was involved in the “Modena Smart Life” event and the “Turin Popular Digital Festival”, and the “Mind the Gap” programme, in Matera and Caserta, with participation in debates extended to the municipalities on innovation topics related to inclusion and overcoming all economic and social divides.

The **“Modena Smart Life” digital culture festival**, in association with the City Council and the Collegio San Carlo Foundation, was an opportunity to discuss the topic of fake news and involved the participation of Wind Tre supporting the “NeoConnessi Silver” training days. These courses focus on informed use of the potential offered by new technologies and particularly the use of smartphones for over-65s.

With its participation in the **Turin Popular Digital Festival**, in association with the Italia Digitale Foundation, Wind Tre had the opportunity to take part in a debate on the topic that appeared in the title of the 2024 festival: “Reduce distances, overcome inequality”.

With the Italia Digitale Foundation, Wind Tre then continued with the **“Mind the gap”** programme in Matera and Caserta. At these events, the company made its own contribution to the debate on the experience and vision of infrastructure and digital services as essential pillars for the innovation and development of the territories. The meetings lead to the creation of shared strategies and concrete projects, with an aim to create a paradigm for the promotion of regions and cities.

Solutions in practice

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, the solution is designed 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.

Working together for innovation

[GRI 203-2a]

Within the framework of CTE (Emerging Technology Homes), the main objective of which is to create regional hubs to attract start-ups and researchers to build digital services to benefit citizens, Wind Tre took part in numerous initiatives as a project partner, providing technology and skills. The services targeted by the CTE fall within the broader picture of the Smart City, with clear ESG implications, as they mainly focus on improving the environment and quality of metropolitan life for citizens. In 2024, Wind Tre was committed to promoting Piscopia Corner with numerous institutions and universities, specifically, taking part in Firenze di Didacta 2024, a trade fair dedicated to innovation solutions for education. Piscopia Corner is a classroom of the future, created by Wind Tre in association with the other important partners and housed at an ITS institute. It is designed to show how digital technologies and the IoT, together with the adoption of new teaching practices, can contribute to making school more resilient, inclusive and efficient, breaking down the barriers of the digital divide for the less fortunate areas of the country.

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 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.

Specifically, over the course of 2024, activities were implemented to raise awareness and promote the P.R.I.D.E. project (Regional Hub for Evolved Digital Innovation) which is one of the first thirteen Italian European Digital Innovation Hub projects financed by the European Commission. Coordinated by Campania Digital Innovation Hub, the purpose of P.R.I.D.E. is to answer to the digital requirements of industries through training and certification services.

As part of the set of innovation projects funded, the project 'Restart' ('Research and innovation on future telecommunications systems and networks', which was launched in 2023, continued www.fondazionerestart.it). 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. In 2024, implementation activities were launched for the solutions designed in 2023 designed to reduce energy consumption of telecommunications networks, reduce the digital divide by means of integration of terrestrial and non-terrestrial networks (drones and satellites), optimisation of energy distribution in Italy, integrating energy communities and smart-grid batteries, the reduction of CO2 emissions through smart algorithms for complex crossroads, and monitoring areas through the sensing capacity of optical fibre.

Active participation of Wind Tre in Horizon 2020 projects:

- Conclusion of 5G-Induce (www.5g-induce.eu): the project developed a 5G edge computing platform to improve the various industrial sectors, show how 5G technologies can contribute to quality of life through applications in training and health and safety in the workplace, and improve energy efficiency and optimise industrial processes.
- Conclusion of 5GMeta (www.5gmeta-project.eu): the project created an open-source platform to exploit data gathered from cars, useful for product development and innovative services. Using the data to optimise driving routes, emissions are reduced, and the relating real-time analysis ensures an improvement in road safety with a positive impact on social well-being.
- Conclusion of smart5Grid (www.smart5grid.eu): the project implemented an experimental open 5G structure, used for the study of possible synergies between 5G and energy distribution networks. The precise control of generation and management of energy demand contribute to the reduction of CO2 emissions and the optimisation of energy use. In addition, the improvement of electricity networks and their safety reduces the risk of blackouts, improving the quality of service for consumers.
- The “NEMO” (Next Generation Meta Operating System project continued, www.meta-os.eu) designed to create eco-mobility functionalities based on synergy between 5G networks and data analysis from public transport, social networks and weather information.
- Continued support of the IoTalentum project (www.iotalentum.eu) As part of the “Horizon 2020 Marie Skłodowska-Curie European Training Network on Internet of Things”, Wind Tre, hosted PhD student, who was given the opportunity to work on cybersecurity projects, shadowing specialised Wind Tre personnel.

Solutions in practice

The San Giorgio a Cremano (NA) municipal council shared its need to develop a Sustainable Mobility Urban Plan (PUMS) with Wind Tre, in order to integrate and strengthen traffic, mobility and transport policies already being studied and analysed.

From the outset, this plan involved the active participation of citizens and stakeholders, using monitoring and assessment tools to support future project choices.

For the final drafting of the PUMS, the council decided to work with Wind Tre, based on a Memorandum of Understanding (MoU) signed in 2023, so that the plan would benefit from Data Analytics as a data-driven support for the municipal council and as a basis for various future Smart City projects.

Based on the indicators share by the municipal council, in 2024, Wind Tre launched a data systematisation programme to draw up a final PUMS, with the support of a partner specialised in urban engineering, Città Sotto Scacco.

The creation of the plan will be in line with the Ministry for Infrastructure and Transport guidelines, with the final conclusion expected by the end of June 2025.

Energy Supervisor for Energy Efficiency

In order to ensure a constant reduction in CO₂ emissions, Wind Tre does not just limit itself to improving its own processes but also supports its customers' commitments to reducing their emissions and energy consumption as well, starting with companies and the Public Administration.

With the **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 CO₂ emissions).

Solutions in practice

In 2024, Wind Tre implemented an innovative solution for two museums in the Campania region, designed to increase sustainability and energy efficiency. Wind Tre was responsible for the design and creation of a photovoltaic plant and the monitoring networks, and for centralised digital consumption and energy management supervision system.

The solution provided the institution with the following benefits:

- Energy benchmark for museum sites: through the monitoring network, it was possible to get a clear and detailed picture of consumption.
- Identification of anomalies in consumption and energy costs: The system allow the timely detection of any anomalies in consumption and energy costs, facilitating immediate corrective measures.
- Promotion of further energy efficiency measures: The data gathered highlighted areas for improvement, promoting further actions to improve energy efficiency.

- Supervision of energy production performance.

Through monitoring and optimisation of energy consumption, this solution contributed to the reduction of environmental impact and the promotion of environmental sustainability.

Electromagnetic emissions under control

Wind Tre **constantly and attentively checks its plants to ensure that they generate electromagnetic emissions below the stringent limits** set by the Italian legislation.

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, Town Councils, Superintendence, 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.

Since 2015, Wind Tre **has published on the websites of the regional ARPAs the monitoring data** of its plants. The plants are subject to regulation 02/12/2014⁷⁵, which requires the verification of hourly and daily average power.

It is well known that, despite the annual Market and Competition Law of 2022, the current electromagnetic limits in force in Italy (CEM limits) have been provisionally raised from 6 to 15 V/min. These are nevertheless lower than the ones in force in the rest of Europe (15 V/m against an average of 40-61/Vm) and therefore do not support the full development of 5G networks and all the services connected to them. This has occurred despite the fact that the epidemiological studies to date have never found any causality links between ill-health and electromagnetic emissions.

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**⁷⁶. WINDTRE'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 CO₂ emissions.

In addition, WINDTRE has introduced the eSIM, which performs the same functions as the classic SIM but totally eliminates the physical support, identifying the customer profile and allowing access to the Wind Tre network.

The company is committed to implementing processes relating to the eSIM to make subscribing to the product easier for new and existing customers. As of the start of 2025, it will also be possible to purchase eSIMs on the digital channel.

Post-sales service

Via a wide-reaching network of over 500 centres throughout the country, Wind Tre offers a broad and comprehensive range of after-sales services for devices, guaranteeing prompt and excellent quality repairs using original spare parts, even with the aim of reusing the product and extending its service life.

⁷⁵ 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).

⁷⁶ Only SIMs for human customers; the green SIMs cannot be used for machine-to-machine (M2M) connections.

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.

For example, in over 35% 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 2024 alone, a total of around 22,700 modem products were refurbished.**

Similarly, a comprehensive service is provided for mobile business customers which, in 71% of cases, allows them to replace their faulty smartphone with a refurbished one. **In 2024, about 3,000 smartphones belonging to Business customers with the Kasko service were refurbished.**

In both cases, the faulty product exchanged can often be subsequently reconditioned and reutilised as a new replacement.

For mobile consumer customers, Wind Tre has partnered with Bolltech to offer its **Reload** services, which offer the possibility of replacing the customers' smartphones with refurbished or repaired products.

These services are offered via the business partner 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).

In 2022, Wind Tre also launched "**Reload exChange**" a trade-in service that allows Wind Tre customers to trade-in their used mobiles at Wind Tre and receive payment directly in their bank accounts **of a sum equal to the** remaining value of the returned smartphone. Valuation of the used smartphone takes place directly in-store **and the used mobile quotation is guaranteed by the customer protection manager.**

VERY MOBILE: Green SIM cards and refurbished mobile phones

Very Mobile⁷⁷, 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 CO₂ emissions⁷⁸.

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](https://www.verycreativi.it) website, which has given anyone who feels the urge the opportunity to express themselves 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.

⁷⁷ 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.

⁷⁸ 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.

Since 2022, Very has launched the sale of **refurbished smartphones** on its own website. These phones allow savings both in financial terms and in terms of CO₂ emissions.

In January of 2023, Very further reaffirmed its commitment to the environment with the launch of **Giga Green**, the **entirely free** programme that allows Very customers to transform the gigabytes of data they consume each month into “Green Gigabytes,” which can be used to help support eco-sustainable and environmental protection projects throughout our country.

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. With the support and participation of its customers, in 2023, Very contributing to supporting reforestation and beach cleaning projects across Italy. Very continued with its commitment in 2024 with **1,000 new trees** planted in Parco Spina Verde (CO) replenish the area and combat deterioration, and with **the removal of 3,773 kg of plastics and waste** from the environment in the areas of Bari, Silvi (TE) and Ariano del Polesine (TV) on national Sea & Rivers Day in association with **Plastic Free Onlus**. Also, in association with Plastic Free, in 2024, Very implemented an awareness-raising project on the importance of deplastification in the middle school of Pomigliano d’Arco, installing a water purifier for the use of the pupils and gifting them reusable bottles. In addition, Very backed a project to care for and rehabilitate Loggerhead sea turtles in Calimera (LE) in the Salento Natural History Museum, following them until their final liberation in the sea.

Very’s commitment to the environment will continue in 2025, as the ‘Giga Green’ programme promotes new projects with the support of specialist partners to help to preserve our country’s territory.

ANNEXES

The origins of this document

[GRI 2-2; 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 2024 financial year (1st of January – 31st of December) with comparisons with the same information from 2023 and 2022 and – wherever possible – that from 2021 and 2020. The entities included in the financial statements correspond to those taken into consideration for this Sustainability Statement, with the exception of the 70% subsidiary RAD, of which Wind Tre does not have operational control, a requirement adopted in the consolidation of the information contained in the document⁷⁹ [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 2024 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.

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 Statement 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 Statement 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:

Wind Tre S.p.A.
Via Monte Rosa, 91 - 20149 Milan Via Cesare Giulio Viola, 48 - 00148 Rome
External Affairs & Sustainability
sustainability@windtre.it

⁷⁹ Operational control applies to all 100% subsidiaries. For more information, see 'The corporate structure'.

Calculation criteria

Electric consumption

The electricity consumption data⁸⁰ include an estimate of the consumption data attributable to Wind Tre for the sites shared with other service providers. This calculation includes an estimate of the consumption attributable to the companies Galata S.p.A. and Cellnex for services offered to Wind Tre using its own equipment (operational criterion). Direct electricity consumption linked to diesel consumption (generators) has been estimated by calculating the litres of diesel consumed in the 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 financial and operational control criteria, all the emissions of the wholly owned subsidiaries are attributed to WindTre [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, and the company's proprietary fleet of vehicles)
- Release of refrigerant gases: (refills of air conditioners/cold stores)

The calculation of the Scope 2 (indirect) GHG emissions includes the emissions from the company's indirect energy consumption, namely electricity consumption, consumption related to district heating, and consumption related to district cooling.

In particular, for the calculation of greenhouse gas emissions, the organisation considers the sum of CO₂ emissions expressed in tCO₂ equivalent. [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 CO₂ equivalent emitted in relation to the volume of fuel consumed).

For 2024, in line with the approach adopted by the parent company CK Hutchison Holding, IEA Emission Factors and DEFRA were used and recalculations performed as of 2020.

In addition, further recalculations were performed based on the results of an audit received in 2024 by the parent company and on the acquisition of Opnet, which took place in August 2024.

The recalculation process was essential to ensuring the accuracy and fullness of the information divulged on company emissions. The recalculations were performed on the emissions from 2020 to 2023, incorporating the new data derived from the aforementioned events. Furthermore, to allow consistency with the parent company, the IEA and DEFRA emission factors were adopted for the 2020-2023 recalculations. [GRI 2-4]

⁸⁰ The figure relating to electricity consumption was calculated on 15 February 2025 and does not take into account subsequent invoicing updates.

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

Description	Units of measurement	CO2 conversion factor				
		2024	2023	2022	2021	2020
Electrical consumption	g CO ₂ /kWh	500.57	457.15	456.57	456.57	469.68
Diesel, heating, generation, haulage	g CO ₂ /Litre	2.48	2.48	2.52	2.48	2.48
Natural gas, heating and haulage	t CO ₂ / Stdm ³ *10 ³	2.04	2.03	1.93	2.03	2.03
Petrol	g CO ₂ /Litre	2.07	2.08	2.15	2.08	2.08

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 CO₂ 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 (Apple, Huawei, etc.)
1b) Purchased goods and services (non-products)	Non-products	Total operating expenditure related to purchased services
2) Capital goods	Capital goods	Total capital goods expenditure
3) Fuel and energy-related activities	Fuels	Energy consumption from fuels
3) Fuel and energy-related activities	Energy	Energy consumption from electricity
4) Upstream transportation and distribution	Upstream devices	Data derived from the origin of device shipments from major suppliers processed by weight per device By definition, we chose to consider transport via container shipments
5) Waste generated by operations	Waste generated by operations	Amount of waste (tonnes) by type and treatment type
6) Business travel	Business travel	Employee business travel data
7) Employee commuting	Employee commuting	Number of employees and calculation made based on average commuting statistics

8) Upstream leased assets	Upstream leased assets	Energy consumption values of upstream leased assets
9) Downstream transportation and distribution		Excluded
10) Processing of products sold		Excluded
11a) Use of products sold	Devices	Total volumes of devices sold
12) End-of-life treatment of products sold	End-of-life of the products	Total volumes of devices sold LCA data for specific devices were taken from publicly available sources published by several major vendors (Apple, Huawei, etc.)
13) Downstream leased assets		Excluded
14) Franchising	Franchising	Total number of franchises and associated square metres with relative energy consumption
15) Investments	Investments	Equity interest in a joint venture, company

Main regulatory actions

Compliance with laws and regulations [GRI 2-27]

ACTIONS OPENED AND CLOSED IN 2024

Regulatory actions opened and closed in 2024⁸¹

Between the end of 2023 and 2024, ten actions and requests for information were opened or closed by the Italian Communications Regulatory Authority (AGCOM) and the Italian Competition Authority (AGCM). None of these was closed with sanctions. The table below provides a summary:

PROCEDURE	AUTHORITY	SUBJECT	OPENING	CLOSURE	PENALTY
Complaint 4/24/DTC	AGCOM	Communication to customers of discontinuation of the auto-top-up component	27/08/24		Awaiting notice of final decision in the action
Information request	AGCOM	Request for clarification on the Iliad dispute, in relation to three winback offers	25/09/24		In progress
DS/4109	AGCM	Request to provide	23/04/2024	10/2024	Action dismissed.

⁸¹ The actions reported in the text are regarded as material in relation to the company's Core Business.

		information on the WINDAY+ service			
DS/4398	AGCM	Request to provide information on the correctness of the activation procedure of certain options	02/09/2024	10/2024	Action dismissed.
DS/4637	AGCM	Report relating to the “Super Fibra 2,5 Giga” offer	27/09/2024		Awaiting response.
DS/4660	AGCM	Lack of visibility of the conditions for use of “unlimited” traffic and of “5G” on the Wind Tre website	08/11/2024		Awaiting response.
DS/4741	AGCM	Request for information on (alleged) undue debit of costs for two fixed-line contracts at the same address of a customer	30/11/2024		Awaiting response.
DS/4472	AGCM	Request for information on the number of complaints relating to invoicing following termination.	25/11/2024		No prosecution of the action is anticipated.
PS12659	AGCM	Unlimited offers	10/2023	04/2024	Action dismissed with decision no. 31164.

Below is a brief description of the decisions shown in the table.

Complaint 4/24/DTC

In August 2024, AGCOM sent a complaint relating to the communication to customers of discontinuation of the auto-top-up component relating to tariff plans PIENO WIND and PIENO WIND SMS, taking place in January 2024. The Authority did not deem the change made to the aforementioned tariff plans were correct, by means of *ius variandi* pursuant to art. 98 septies-decies paragraph 5. Wind Tre submitted its defence, arguing that it was not a unilateral redefinition of the offer (i.e., exercise of *ius variandi*), but rather of unilateral withdrawal by Wind Tre of the auto-top-up owing to termination of the offer, pursuant to Art.11 paragraph 8 of the Code of Electronic Communications, and to Art. 6.3 of the General Terms and Conditions of Contract.

Wind Tre is awaiting notification of the final decision in this action.

Information request

In September 2024, AGCOM asked Wind Tre to provide clarification on the Iliad complaint, which reported that the winback offers “GO200XXS” and “GO200XXS5G”, transmitted by text message, were not compliant with the regulations in force, and in the case of “GO200XXSEASYPAY” (however, the latter was never publicised by text message). Wind Tre sent its response to AGCOM on 7 October 2024, showing that the complaints raised were groundless, reiterating the full compliance of the offer messages point by point with the regulations in force.

Wind Tre is awaiting the result of the arguments put forward, which should reasonably lead to failure to open sanctioning proceedings.

DS/4109

In April, AGCM asked Wind Tre to provide information on the WINDAY+ service, to show that activation of the service does not occur automatically, simply by browsing on the app, but that an expressed declaration of intent on the part of the customer is necessary.

Wind Tre’s arguments led AGCM, in October 2024, to dismiss the action in the light of proof of legitimacy of the activation procedure for the service in question.

DS/4398

In September, AGCM asked Wind Tre to provide information on the correctness of the activation procedure of the “Più Sicuri Casa”, “Più Sicuri Mobile” and “Più Sicuri Mobile Pro” options, in order to prove that the activation of the aforementioned options only take place upon the express request of the customer.

Wind Tre’s arguments led AGCM, in October 2024, to dismiss the action in the light of proof of legitimacy of the activation procedure.

DS/4637

At the end of September, AGCM asked Wind Tre for a response to verify a report relating to the “Super Fibra 2,5 Giga” offer, from a customer who complained of being charged for the cost of the modem, which had been advertised as “included” in the overall monthly cost of the offer. On 17 October 2024, a response was sent proving the lack of grounds for the complaint.

Wind Tre is awaiting a response on the position taken which, should reasonably lead to dismissal of the action.

DS/4660

In November, AGCM reported the believed lack of visibility of specifications relating to the unlimited claim and “5G” on the Wind Tre website. With a view to moral suasion. Wind Tre included the reported touch point with the appropriate findings.

Wind Tre is awaiting an official response on the position taken which, should reasonably lead to dismissal of the action.

DS/4741

At the end of November, AGCM requested information relating to an (alleged) unjustified charge of costs relating to two different contracts for the provision of a fixed line service at the same address of a customer. In its response, Wind Tre provided evidence of the contracts entered into by the customer, of which the customer was aware, indicating a pending settlement underway at Corecom Lazio.

Wind Tre is awaiting a response on the position taken which, should reasonably lead to dismissal of the action.

DS/4472

In November, AGCM asked Wind Tre to send information on the number of complaints in relation to invoicing following termination by fixed, mobile consumer and microbusiness customers in the months June to October 2024.

With its response, Wind Tre showed a volume of complaints that were negligible in percentage terms by comparison to the volume of requests for termination/migration of the contract in the period in question. For this reason, no prosecution of the action is anticipated.

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.

Wind Tre's arguments were accepted by AGCM, which gave notice in April 2024 that the action no. 31164 had been filed.

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

28 days

With regard to the '28 days' proceedings, it should be noted that the issue 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 proposed an appeal to TAR (on 23 September 2021) , which withdrew in February 2025, deeming that it no longer had a current interest in the claim.

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

Wind Tre expunged from its contract documentation any reference to possible annual notification of the customer of any change in price in offers based on the rate of inflation recorded waiving that right.

GRI content index

GRI content index			
Wind Tre has submitted a report compliant with the GRI standards for the period from 1 January 2024 to 31 December 2024			
GRI 1 – Fundamental Principles – 2021 version			
GRI Standard	Disclosure	Location	Omission
General Disclosures	2-1 Organisational details	The corporate structure (p.16)	
	2-2 Entities included in the organization's sustainability reporting	The corporate structure (p.16)	
	2-3 Reporting period, frequency and contact point	The origins of this document (p.109)	
	2-4 Restatements of information	1 January 2024 - 31 December 2024 (same period as the cash flow statement) publication date 23 July, 2025	
		The corporate structure (p. 16)	
		Zero emissions goal (p. 92)	
		Calculations criteria (p. 110)	
	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.	
	2-6 Activities, value chain and other business relationships	Who is Wind Tre? (p.12)	
		Sustainability in the supply chain (p.38)	
	2-7 Employees	The Wind Tre team (p.83)	
	2-8 Workers who are not employees	The Wind Tre team (p.83)	
	2-9 Governance structure and composition	The corporate structure (p.16)	
	2-10 Nomination and selection of the highest governance body	The corporate structure (p.16)	
	2-11 Chair of the highest governance body	The corporate structure (p.16)	
		The sustainability governance model (p. 29)	
	2-12 Role of the highest governance body in overseeing the management of impacts	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. 29)	
	2-14 Role of the highest governance body in sustainability reporting	The sustainability governance model (p. 29)	
	2-15 Conflicts of interest	The origins of this document (p.109)	
		The fight against corruption and conflicts of interest (p. 33)	
	2-16 Communication of critical concerns	Corporate governance (p. 30)	
	2-17 Collective knowledge of the highest governance body	The sustainability governance model (p. 29)	
	2-18 Evaluation of the performance of the highest governance body	The sustainability governance model (p. 29)	
	2-19 Remuneration policies	Caring for people (p. 80)	
		The process of rewarding (p. 82)	
	2-20 Process to determine remuneration	Caring for people (p. 80)	
		The process of rewarding (p. 82)	
GRI 2 - General Disclosures 2021	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 (p. 30)	
	2-24 Embedding policy commitments	Corporate governance (p. 30)	
	2-25 Processes to remediate negative impacts	Stakeholder and relevant topics (p. 24)	
		The pursuit of shared solutions (p. 59)	
	2-26 Mechanisms for seeking advice and raising concerns	Whistleblowing (p. 34)	
	2-27 Compliance with laws and regulations	Main regulatory actions (p. 106)	
		*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)	
	2-28 Membership in associations	Furthermore Wind Tre Supports: United Nations Global Compact, Italy	
	2-29 Approach to stakeholder engagement	Stakeholder and relevant topics (p.24)	
	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.24)	
	3-2 List of material topics	Stakeholder and relevant topics (p.24)	
		Stakeholders and relevant topics (p. 24)	
	3-3 Management of material topics	Child protection in the digital domain (p.42) Cybersecurity and Privacy (p.47) Digital Divide (p.62) Inclusion of disabilities (p.71) Lifelong digital learning (p.74) Decarbonisation (p.90) Smart technologies for society and the environment (p.98)	

Specific standards			
GRI Standard	Disclosure	Location	Omission
Child protection in the digital domain			
GRI 418 - Customer privacy	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Personal data protection (p. 52)	
Cybersecurity and Privacy			
GRI 203 - Indirect economic impacts	203-2 Significant indirect economic impacts	Focus on data security (p. 48)	
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.76)	
	404-2 Programs for upgrading employee skills and transition assistance programs	Continuous skill development (p.76)	
	404-3 Percentage of employees receiving regular performance and career development reviews	Continuous skill development (p.76)	
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. 92) Calculation criteria (p. 110)	
	305-2 Energy indirect (Scope 2) GHG emissions	Zero-emissions goal (p. 92) Calculation criteria (p. 110)	
	305-4 GHG emissions intensity	Zero-emissions goal (p. 92)	
	305-3 Other indirect (Scope 3) GHG emissions	Zero-emissions goal (p. 92)	
	305-5 Reduction of GHG emissions	Zero-emissions goal (p. 92)	
GRI 203 - Indirect economic impacts	203-1 Infrastructure investments and services supported	Zero-emissions goal (p. 92)	
GRI 302 - Energy	302-1 Energy consumed within the organisation	Zero-emissions goal (p. 92)	
Smart technologies for society and the environment			
GRI 203 - Indirect economic impacts	203-2a Significant indirect economic impacts	Working together for innovation (p. 97)	
Other Topics			
GRI Standard	Disclosure	Location	Omission
Business ethics and integrity			
GRI 308 - Supplier environmental assessment	308-1 New suppliers that were screened using environmental criteria	Sustainability in the supply chain (p.35)	
GRI 414 - Supplier social assessment	414-1 New suppliers that were screened using social criteria	Sustainability in the supply chain (p.35)	
Closer to our people			
GRI 401 - Employment	401-1a New employee hires and employee turnover	The Wind Tre team (p.77)	
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Caring for people (p. 80) The establishment of 'significant operating locations' is not applicable	
	401-3b, c, d, e Parental leave	The Wind Tre team (p.77)	
GRI 403 - Occupational health and safety	403-5 Worker training on occupational health and safety	Continuous skill development (p.70) Occupational health and safety (p.83)	
	403-9a, c, d, e, f, g Work related injuries	Occupational health and safety (p. 83)	
	403-10 Work-related ill health	Occupational health and safety (p. 83)	
GRI 405 - Diversity and equal opportunity	405-1 Diversity of governance bodies and empl	The Wind Tre team (p. 70) Focus on diversity & inclusion (p. 62)	
	405-2 Ratio of basic salary and remuneration of women to men	Focus on diversity & inclusion (p. 62)	
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. 56)	

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 2024 Sustainability Report, for the purpose of providing findings over:

- *the accuracy and quality of published information concerning its sustainability performance;*
- *degree of adherence to the reporting principles stated by the organization in the table of contents, in particular, the principles of the Global Reporting Initiative (GRI) version 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 2024 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:

- *verification of policies, mission, values, commitments;*
- *review of records, data and information-gathering systems;*
- *interviews with members of the working group responsible for drafting the Report;*
- *interviews to company representatives from various functions and levels as well as members of the Management;*
- *overall verification of information and general review of the contents of the 2024 Sustainability Report.*

The assurance activities have been performed "remotely". We believe we have obtained sufficient and adequate evidence to support our conclusions.

entire 2024 Sustainability Report of WIND TRE S.p.A., with the following clarifications: for economic and financial information, Bureau Veritas limited itself to verifying its consistency with the central data collection and consolidation systems used to prepare WIND TRE S.p.A.'s financial statements as of December 31, 2024, which were not subject to verification; for activities conducted outside the reference period (January 1, 2024 – December 31, 2024) and for statements of policy, intent, and objectives, we limited ourselves to verifying their consistency with the relevant methodological assumptions.



3. CONCLUSIONS

Following the assurance activities conducted and described above, no negative indications emerged regarding the reliability, accuracy, and correctness of the information and data reported in the 2024 Sustainability Report. In our opinion, the 2024 Sustainability Report provides a reliable representation of the activities carried out by WIND TRE S.p.A. during 2024 and the main results achieved. The information is generally presented in a clear, understandable, and balanced manner; in exceptional cases where data and indicators could not be collected and analyzed with absolute precision, this was reported transparently. In illustrating its activities and results, in particular, WIND TRE S.p.A. took care to use neutral language, avoiding self-referentiality as much as possible.

With regard to the reporting principles declared by WIND TRE S.p.A., in our opinion, the principles set out in GRI 1: Fundamental Principles 2021 (accuracy, balance, clarity, comparability, completeness, sustainability context, timeliness, verifiability) have been observed. We also confirm that the organization meets the GRI requirements for preparing reports "in accordance" with GRI Standards and that our verification activities also meet the requirements of the assurance standard.

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, 84.000 employees and an annual turnover of more than 6,2 billion euro (revenues 2024).

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 S.p.A. at the time of the assurance.

Bureau Veritas Italia S.p.A.
Milan, July 17, 2025



Gloria Focetola
Local Technical Manager