



MUCH CLOSER FOR A MORE SUSTAINABLE FUTURE

2021
SUSTAINABILITY
REPORT



LETTER TO THE STAKEHOLDERS

GRI
102-14

Every day we find ourselves facing new and increasingly important challenges in an unprecedented era. In the last two years, we have **experienced a new normal** and have learned to live with an enemy that has limited our freedoms, but which we have defeated by **learning to be together, even when we're apart**. The National Recovery and Resilience Plan has given Italy the prospect of a country that will be economically more solid, connected and inclusive. In addition, **attention to sustainability issues is increasing exponentially**.

Within this context of considerable challenges and opportunities, we are proud to be taking the helm at WINDTRE: a leading company in mobile telecommunications in Italy that offers a constantly increasing range of ICT services and is ready to actively support the country in achieving a **more sustainable and inclusive future through the Twin Transition** to green and digital.

The story of WINDTRE is one of sticking together and is centred around **people and the bonds between them**. Our **Top-Quality Network** and our commitment as a *human network builder* were born to **close the distance between people** and to assist them in their daily challenges, with the help of technology.

We strongly believe that **a more sustainable future can only be achieved through joint efforts**. With the collaboration of all company departments and our key stakeholders, we have recently implemented a new **sustainability plan**, with ESG goals that are measurable and fully integrated into our business, to be achieved in the next years. Our targets provide for the **collective and pervasive commitment of the entire corporate community**. Furthermore, recognising the importance of this network of people, we are constantly committed to cultivating and improving relationships with each of our stakeholders through a range of initiatives and projects.



With regards to digital responsibility, the **NeoConnessi** digital and media education project is designed to assist families and teachers as they help young people learn to use the Internet responsibly on their own. This initiative has seen the involvement of an increasing number of Italian schools in a shared reflection between children, families, and teachers. In collaboration with the WWF, we've recorded a **27% reduction in our CO₂ emissions** since 2017, and together with Arbolia, we've created a new urban forest in the city of Taranto. We work hand-in-hand with local governments and their representatives on an ongoing basis to expand, **bolster and modernise the digital infrastructure**, as well as to enable the dissemination of new technologies. In 2021 alone, we raised and donated over € 2.1 million in support of 93 social and humanitarian initiatives and continued to promote **the well-being and inclusion of our staff**, as recognised through our Equal Salary Foundation certification and by the award we received as Top Italian Employer for the fourth consecutive year.

These and other successes were made possible thanks to the constant commitment of the WINDTRE people and the valuable guidance of our former CEO, Jeffrey Hedberg, who was able to promote a **corporate culture of innovation, responsibility and sustainability**.

It is, therefore, an honour for us to continue on this ambitious pathway, **making WINDTRE an increasingly green, responsible, and human-oriented company**. We would like to thank all those who have personally contributed to it and will continue to dedicate all their energy to a more sustainable future.

Enjoy your reading,

Gianluca Corti and Benoit Hansen

CO-CEOs - Wind Tre

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SUMMARY

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WE EXIST TO CLOSE THE DISTANCES BETWEEN PEOPLE

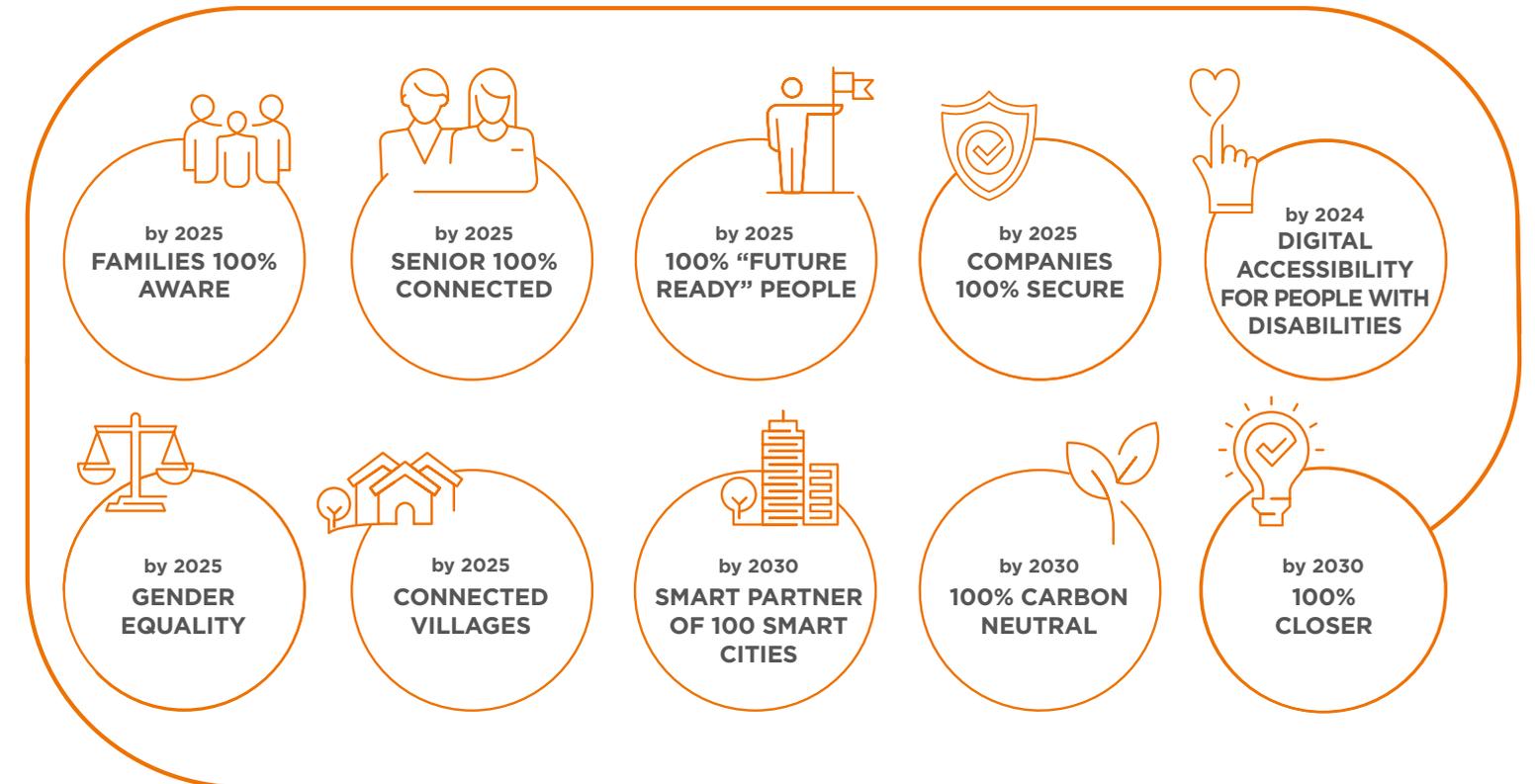
As part of the CK Hutchison Holdings Limited Group, WINDTRE is the leading company on the Italian mobile market, and is one of the main alternative fixed network operators

MUCH CLOSER FOR A MORE SUSTAINABLE FUTURE

We at WINDTRE **exist to close the distance between people** because we know that together, united, we can do great things. That's why we work to enable and empower **the most important network of all, the one made of people. We want to be the telecommunications company to choose every day to ensure a better life and future for all**, and we believe that technology is the key to a greater inclusion. From the beginning of WINDTRE, we have invested 6 billion euros in our **TOP QUALITY** Network to ensure speed, reliability, equal access and a safer digital environment for everyone, including the most fragile. We believe in an inclusive technology that is also capable of improving the **environment, health and quality of life**. We work to **reduce emissions** and **accelerate the transition to smart and sustainable cities**, of which digital technologies are one of the main enablers.

2030 ESG PLAN

We have defined a long-term **ESG** (Environmental, Social and Governance) **Plan, 10 ambitious goals** aligned with the 2030 Agenda of the United Nations. A concrete, measurable program, realized with the participation of all business areas and coherent integrated into the business.



To maximize our positive impact on society and the planet, we have defined, together with the representatives of our stakeholders, the issues on which we want to make a difference. These issues, and the resulting actions, **refer to 3 key areas: More Responsibility, More Humanity, More Green.**

MORE RESPONSIBILITY



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

The establishment of a new **sustainability plan** with a horizon of 2024 and 2030, and the inclusion of sustainability indicators in the top management's incentive plan

€ 18 million invested in data and systems security in 2021 alone, in order to guarantee maximum protection for our customers and infrastructures

The growth of the “NeoConnessi” project: during the course of the 2020/2021 school year, the digital and media education project engaged with **over 5,000** fourth and fifth grade primary **classes**, assisting families and teachers as they help young people learn to use the Internet responsibly on their own

81 on 100 overall customer satisfaction, with **86.2 on 100 loyalty** (DOXA survey)

The introduction of the new **Business Continuity Framework** for identifying potential digital threats and improving resilience in delivering products or services

Alongside the Parole O_stili project, to support the “non-hostile” communication manifesto: 10 useful principles for improving online communication and behaviour

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

Total Quality Management: an integrated management system covering all the company departments to ensure the quality and safety of the processes throughout the entire supply chain, in accordance with the principles of continuous improvement

Membership in **Transparency International Italia:** the Italian branch of the world's largest anti-corruption group

Artificial Intelligence at the service of customer support, to ensure a simple and uniform experience among all the contact channels



MORE HUMANITY



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

First telecommunication company in the world to receive **Equal Salary certification**

NeoConnessi Silver: a platform and a Facebook Group designed to help seniors become more familiar with technology, to create a community, and to share experiences

The appointment of a **Diversity & Inclusion Manager** to further increase the company's focus on the principles of equity, equal opportunity, diversity, and inclusion

The **Disability Hub:** an internal reference point on the company's intranet for collecting reports and suggestions from employees regarding disability issues

A new **welfare plan** to support the commitments and responsibilities assumed by all the employees throughout the pandemic, with **92% of the credits being disbursed within 3 months of the launch date**

The "**Full Care**" initiative, held in partnership with Comarch, aimed at improving the quality of life and day-to-day safety of the elderly and people with disabilities

93 social and humanitarian initiatives supported in 2021, with a total of € 2.1 million collected

Attendance of internal training courses on sustainable transition by **5,800 people in 2021 alone**

The **Sustainability Newsletter**, created to disseminate the culture of sustainability throughout the company, and sent to all employees on a bimonthly basis

Easy Wi-Fly and digital board services: solutions created to provide scholastic institutions with Wi-Fi networks capable of linking the educational and administrative areas

The **Federated Innovation@MIND** project, dedicated to the creation of a classroom of the future, in order to show how the use of digital technologies and the IoT can help make schools more resilient and break down the barriers of the digital divide

Recognition by **Top Employer Italia** for the fourth consecutive year, in addition to recognition as one of **Italy's Best Employers for Women** and a **Top Job Best Employer**



MORE GREEN



#Decarbonisation/#Smart technologies for the environment

27% decrease in CO₂ emissions from 2017-2021, within the framework of the climate and energy partnership with the WWF

The creation of a **new urban forest** in the city of Taranto, with over 1,000 trees planted, in partnership with Arbolia and the recovery, with the “Oasis project”, of the WWF Oases closest to our offices

Energy Supervisor: an ICT solution for the digital management of energy consumption and expenditures

WINDTRE and WWF for the Mediterranean: a partnership with the WWF and our customers to protect the landscape and the species of the Mediterranean Sea

The promotion of **sustainable mobility** with the **corporate car sharing** service, and a company car fleet made up of **80 hybrid or electric cars and 17 charging stations**

Initiatives to **improve the sustainability of the working environment**, from lighting systems with automatic on and off functions, to smart office sharing, the use of recycled paper and recyclable toner, and the installation of drinking water dispensers to eliminate the use of plastic bottles



Corporate Partner of the House of Emerging Technologies in Rome (CTE): living lab in Rome's Tiburtina station for companies, startups and institutions that can experiment innovative services with the integration of 5G networks for useful solutions for citizens and businesses

Zero logistics emissions by 2050: the Green Logistic goal defined together with DHL

The extension of the products' life cycle through **repair and reuse options** for consumer and business customers

Activities aimed at making the **shops more sustainable**: LED lighting, air quality monitoring platform, reduction of paper consumption, and new eco-sustainable uniforms for employees



SCENARIO

GRI
102-15

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CHANGES AND CHALLENGES IN A KEY SECTOR FOR THE TWIN TRANSITION

The Internet has been an essential tool for actively participating in society for years. The Covid-19 pandemic highlighted the important role that connectivity plays in global society, revealing how a fast, stable, and wide-reaching connection is a fundamental prerequisite for working, communicating, obtaining information, and purchasing products and services. **During the course of the pandemic, telecommunications played a fundamental role for citizens and businesses alike**, enabling communications between individuals, the continuation of education and training activities, remote work, and the continuity of remote therapeutic activities (telemedicine), while at the same time ensuring business continuity and resilience.

In this context, telecommunications and connectivity services have been increasingly in demand, and the market demand remains solid. In 2021, there were 8 billion mobile network users worldwide, while in September of 2021 there were a total of **105 million SIM cards** in Italy, for an annual increase of almost two million. Each individual's **mobile data consumption increased by 36%** compared to the same period in 2020¹.

Telecommunications operators, however, have been struggling for years due to a saturated and extremely competitive market. In Italy, the turnover crisis is a result of competition from digital platforms, the costs of the frequencies and the network updates, and considerable price competition.

In fact, gross revenues decreased by 5% in 2020 compared to 2019, for an amount equivalent to € 1.5 billion².

¹ AGCOM: Osservatorio sulle comunicazioni no. 4/2021, 2021

² Report on the telecommunications supply chain in Italy, Polytechnic University of Milan, 2021



8 billion

Mobile network users worldwide in 2021

(Ericsson, 2021)



+36%

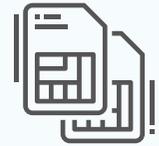
The increase in cyberattacks in Italy from 2020 to 2021 (about 903 weekly attack on average for Italian companies)

(Check Point Research, 2021)

€ 65 billion

The total investments made in network infrastructures by telecommunications operators in Italy from 2010 to 2019

(The European House-Ambrosetti, 2021)



105 million

SIM cards held by Italians as of September 2021 (almost two for each resident)

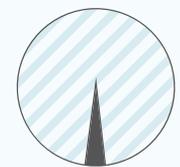
(AGCOM, 2021)



81%

The percentage of Italians with an Internet connection as of 2021 (as opposed to a European average of 89%)

(The European House-Ambrosetti, 2021)



3.6%

The percentage of Italian workers employed in the information and communication technologies sector in 2020 (4.3% in the EU)

(European Commission, 2021)



A GROWING SECTOR

Increase in demand for connectivity in the pandemic and post-pandemic period. +36% consumption of mobile data

The increase in consumption and competition has also been accompanied by an increase in risks, above all exposure to cyberattacks: **from 2020 to 2021, attacks on Italian companies increased by 36%**, for a total of approximately 903 cyberattacks per week.

Aware of the fundamental role that they play in the Twin Transition, **TELCO companies are looking for new business opportunities in adjacent markets, like that of digital and IT services for example, which is expected to grow by 8.8% in Italy over the next 4 years.** Diversification makes it possible to expand the product offering, even based on principles of sustainability, such as through joint proposals with electricity and gas providers.

For example, in 2021 WINDTRE launched a partnership with Acea in order to provide its users with access to 100% eco-sustainable electricity and gas contracts.

In terms of European policies, **the TELCO sector is considered crucial to the Twin Transition: the green and digital transition** whose success would make the European Union the first continent to achieve zero net emissions by 2050³.

The Twin Transition has also served as a guide for the post-pandemic recovery tools introduced by European and national institutions. In fact, the National Recovery and Resilience Plan allocates almost € 24 billion to the digitisation, innovation, and competitiveness of the European production system, € 6.7 billion of which are earmarked for ultra-broadband and 5G⁴.

THE VALUE OF THE TELCO SECTOR FOR THE NATIONAL ECONOMY

At the end of 2019, there were about 220 companies in Italy operating in the field of fixed and mobile telecommunication services. Among these, the 8 main players who own, develop, and maintain the signal transmission infrastructures play a key role. During the same period, the total revenues of these companies amounted to € 31.2 billion, which was 1.5 times greater, for example, than the revenues generated by the textile industry, with a workforce of approximately 63,000 employees, 86.3% of whom are employed by the top 5 companies.

In terms of GDP contribution, the sector generated € 16.5 billion in direct added value, and invested € 7.6 billion⁵. If we also take into account the supply and subcontracting chains present throughout the fabric of the national economy, and their induced impact, **the turnover generated by the telecommunications sector in Italy amounted to € 71 billion in 2019, a figure 3 times greater, for example, than the direct turnover of the pharmaceutical sector that same year.**

There has been considerably greater increase in demand for Internet connectivity in Italy than in other countries. While just 54% of individuals used the Internet in 2010 (as opposed to a European average of 69%), 81% of Italians used it in 2021 (with a European average of 89%).



TWIN TRANSITION

The TELCO sector is considered crucial for achieving the Twin Transition, the double transition to Green and Digital



71 BILLION EUROS

The business turnover generated by telecommunications in Italy in 2019

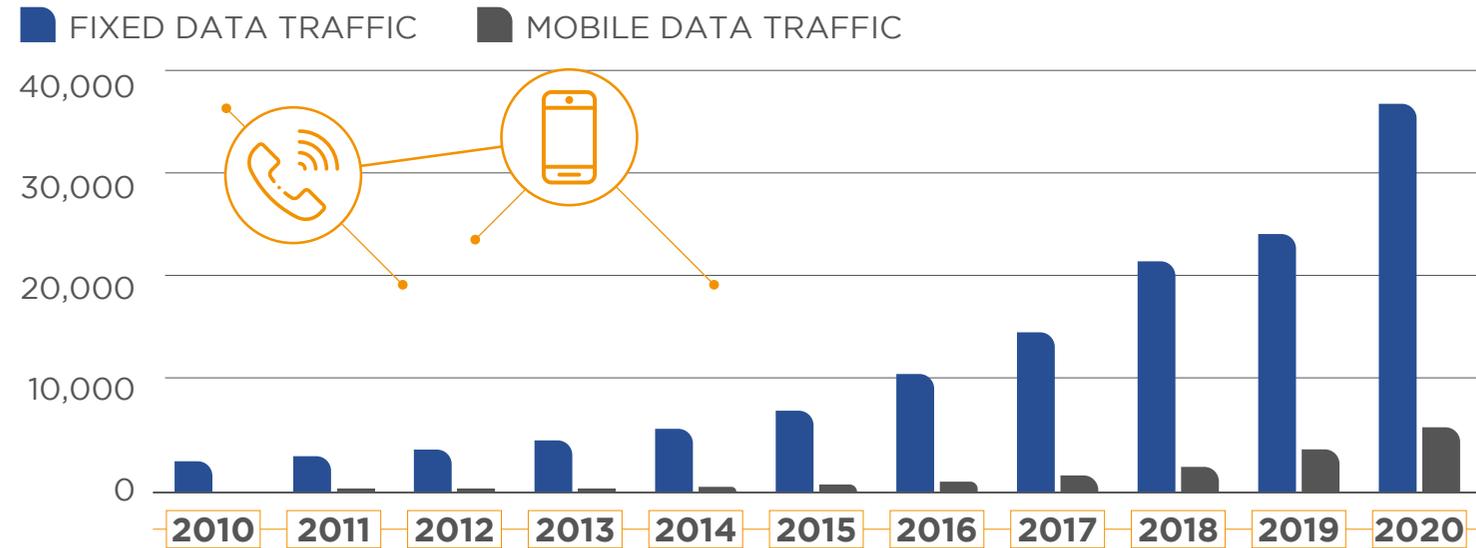
³ CE, COM 2019/640 final, The European Green Deal (2020)

⁴ The new tlc system: the evolution from TELCO to techco, Sole 24 Ore, 2021

⁵ Ibid.

Figure: Mobile and fixed annual traffic in Italy (Petabyte).
Source: The European House - Ambrosetti data processing on ITU, Eurostat and Agcom 2021 data

MOBILE AND FIXED ANNUAL TRAFFIC IN ITALY (PETABYTE)



Source: The European House - Ambrosetti data processing on ITU, Eurostat and Agcom 2021 data



GROWTH

Italy has recorded a growth rate of Internet use of 27%

Italy therefore recorded a growth rate in Internet use of 27%, as opposed to 20% in Europe and 25% worldwide⁶ (for an average growth of about 7% per year).

Overall data traffic has also increased, on both the fixed and mobile networks. In the first case it increased 12-fold compared to 2010, while in the second case it increased 50 fold over the same period⁷.

⁶ The value of the telecommunications sector to the national economy, Ambrosetti, 2021

⁷ Ibid.

This increase is mainly due to the technological evolution of the electronic devices and communication networks, as well as changes in user habits, who are becoming increasingly connected and used to taking advantage of digital services and products in their everyday lives.

TELCO operators in Italy have responded to the increased demand for connectivity by making significant investments in the network infrastructure and services, which increased by nearly 25% from 2010 to 2019, and have now reached a cumulative value of almost € 65 billion. The interventions have mainly been focused on the expansion of the broadband network, the development of ultra-broadband, the construction of the 5G network, and the security of the telecommunications networks and services⁸.

Italy is currently one of the leading European players in the development of the 5G network, and ranks third in terms of the number of 5G tests conducted⁹.

DIGITAL ITALY: INFRASTRUCTURES AND SKILLS FOR THE FUTURE AND BEYOND

Italy's digitisation process is far from complete. **In fact, Italy still lags behind other European countries in terms of connectivity and ranks 23rd on the Digital Economy and Society Index (DESI).** While fast broadband coverage is proceeding at an adequate pace, the same cannot be said for gigabit coverage: just 34% of the population is covered, compared to a European average of 54%¹⁰.



23rd

The position of Italy in terms of connectivity compared to the other European countries

⁸ Ibid.

⁹ European Commission, Quarterly Report 11 and prior, April 2021.

¹⁰ European Commission: European Innovation Scoreboard 2021, 2021

According to data published by the Ministry of Economic Development, as of 31 March 2021, 89.6% of Italian households had access to connections with download speeds greater than 30 Mbps, still falling short of 2020 full coverage goal set by the National Ultra-broadband Strategy¹¹. Even for the fastest networks, coverage still remains insufficient: just 22.9% of households have access to connections with speeds ranging from 300 to 1,000 Mbps¹².

Digitisation must be accompanied by **adequate investments in training**, especially in the business world, in order to update the skills needed in a constantly evolving sector. And while the integration of digital technologies within Italian companies is well underway, with 69% of Italian SMEs having at least a basic digital infrastructure¹³ (almost 3 times greater than the European average), there is still a gap to be filled in terms of personal digital skills. According to the DESI, **in 2019 just 42% of Italians between 16 and 74 years of age had basic digital skills, compared to a European average of 58%¹⁴, while just 3.6% of employees were specialised in the technology sector¹⁵.**

The digital advances in Italy are not equally distributed throughout the country.

The so-called digital divide between the North and South still remains, mostly due to the lack of adequate infrastructures in the southern regions. In terms of digital performance measured by the DESI (or rather the performance of the digital activities implemented by a Region), the scores range from 72/100 for Lombardy, to 18.8/100 for Calabria, which is last in the ranking. All the regions of the South ranked below the Italian average (equal to 54/100)¹⁶.

In order to encourage and ramp up the country's digital transition, Italy has invested a total of € 235 billion within the context of the National Recovery and Resilience Plan (PNRR), which will be used for the digitisation of the Public Administration, the justice system, and the Italian economy, for improving connectivity throughout the country, and for investments in digital satellite monitoring infrastructures and the space economy sectors¹⁷.

In order to manage the funds earmarked for digitisation and achieve the goals laid out by the PNRR, Italy has developed the **Italia Digitale 2026** strategy, which is concentrated upon two main fronts: digital infrastructures and ultra-broadband connectivity, and the digitisation of the Public Administration¹⁸.



INFRASTRUCTURE

TELCO operators have responded to the demand for connectivity with significant investments in network infrastructure and services



235 BILLION EUROS

The investment to boost digital transition under the National Recovery and Resilience Plan (PNRR)

¹¹ Ministry of Economic Development (2021): *The Italian Ultra Broadband Strategy "Towards the Gigabit Society"*

¹² *Ibid.*

¹³ *Digital Economy and Society Index (DESI) 2021, European Commission, 2021*

¹⁴ *Digital Single Market: Europe's Digital Progress Report 2020 for Italy, European Commission, 2020*

¹⁵ *Digital Economy and Society Index (DESI) 2021, European Commission, 2021*

¹⁶ *Digital Agenda Observatory, Polytechnic University of Milan, 2021*

¹⁷ *Law 101/2021: the National Recovery and Resilience Plan (PNRR)*

¹⁸ *Italia Digitale 2026, MITD, 2021*

2021 RESEARCH REPORTS

In 2021, in collaboration with major research institutes, WINDTRE commissioned several new reports focused on the telecommunications sector in Italy, and on the value of post-Covid connectivity. The main results published during the course of the year are shown below.

The value of connectivity in post-Covid-19 Italy

Censis Report

The report published by Censis (Centro Studi Investimenti Sociali), in collaboration with WINDTRE, is titled “The value of connectivity in post Covid-19 Italy – Why telecommunications operators are essential to the recovery and resilience of the country and the Italian people”.

The research was presented in July 2021 during a digital and physical event held at the Luiss Business School in Rome and highlights the essential role that telecommunications companies play in the country’s development: in fact, the pandemic has led Internet access to be considered as a fundamental right, and 86.3% of Italians are now convinced that Internet access should be guaranteed to everyone, regardless of their location or circumstances. TLC operators guaranteed fast, secure, and reliable connectivity all throughout the Covid-19 pandemic. As essential players both during the pandemic and in the new post-crisis context, the Italian telecommunications companies have been operating at low margins for some time due to the lower rates imposed by fierce competition and increasing infrastructure investments. This is a paradox to be resolved now that the Internet has become such an integral part of everyday life.

The value of the telecommunications sector to the National Economy

European House Ambrosetti Report - interim report

The interim management report, the first part of which has already been published, highlights the impact that telecommunications have on the competitiveness of Italy’s industries and economy. The telecommunication sector not only contributes to employment and the national added value, but facilitates interpersonal connections, the digital economy, and business development: in short, the telecommunications sector is a cross-cutting enabler of all areas of economic activity.

In light of the Italian telecommunications sector’s importance and development priority, The European House - Ambrosetti, in collaboration with WINDTRE, decided to launch a research and analysis project regarding the sector’s value for the country’s growth and competitiveness. The goal is to provide objective and independent analysis and evidence to fuel the public debate on an issue of fundamental importance to the country’s economic growth at a time of radical change, such as the launch of the PNRR, and the start of the new post Covid-19 economic cycle.

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The Telco sector in Italy: regulatory framework and impact analysis

Luiss Business School Report – first section

Digitisation has played a decisive role in promoting economic and social growth during the post-pandemic period, but many countries, including Italy, do not have the infrastructures necessary to guarantee uniform connectivity for both households and businesses. This is what is revealed by the first part of the study titled “The Telco sector in Italy: regulatory framework and impact analysis”, carried out by the Luiss Business School of Rome in collaboration with WINDTRE.

According to the report, our country remains at the bottom of the European ranking in terms of ultra-broadband services, although the delay is also due to poor receptiveness on the part of the market: in fact, just 61% of Italian households subscribe to broadband services. Therefore, the study points out, a rapid and widespread digital literacy campaign must be carried out in order to fully reap the benefits of the development of new networks, starting with 5G. All with the help of effective public/private sector collaboration, thanks to the interventions of the institutions, such as the bureaucratic simplification for the construction of infrastructures, and the electromagnetic limit reforms, which are now among the lowest in Europe.

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ABOUT US

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WINDTRE is the number one mobile operator in Italy¹⁹ and one of the leading alternative fixed network operators. The company is part of the multinational group CK Hutchison Holdings Limited.

The new WINDTRE mobile network **covers 99.7% of the population in 4G, and 95.7% in 5G²⁰**, with state-of-the-art infrastructure. The company is also committed to expanding fibre optic-based ultra-broadband connectivity services and FWA throughout the country.

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

The brand for the consumer market is accompanied by the **WINDTRE BUSINESS** brand, which is dedicated to helping businesses and professionals face the challenges posed by the digital transformation. In fact, the WINDTRE BUSINESS brand offers innovative products and services with a wide range of integrated fixed and mobile telephony solutions, ultra-broadband, fibre optic, and FWA connectivity services, and Data Analytics, Cybersecurity, and Cloud solutions with the next generation Data Centres, all in partnership with numerous industry-leading ICT Solution and Application Providers.

¹⁹ Report AGCom, 29 December 2021

²⁰ In order to get 5G browsing speeds, the user must have a 5G service plan with a device enabled for the WINDTRE network, and must be within a WINDTRE 5G coverage area. 5G service only valid in Italy. For info and coverage, see windtre.it/5g

PART OF THE CK HUTCHISON GROUP

CK Hutchison is a multinational group that operates in four business areas: ports and related services, retail, infrastructure, and telecommunications. The Group operates in approximately **50 countries** worldwide and has over **300,000 employees**.

The **Telecommunications** division, which also includes WINDTRE, is a global leader in converged telecommunications services, which combine the provision of telephony, Internet, and connectivity-related digital services within the same plan.



NUMBERS

The new WINDTRE mobile network covers 99.7% of the population in 4G, and 95.7% in 5G

CK HUTCHISON SUSTAINABILITY FRAMEWORK

Given the size of the Group and the breadth and complexity of its operations, CKHH is faced with numerous sustainability challenges, which it assesses and prioritises through ongoing engagement with all of its stakeholders.

The Group has defined a structured governance model for managing sustainability, with a Board-level Sustainability Committee, and of sustainability policies, which include a foundational Sustainability Policy, an Environmental Policy, a Health and Safety Policy, a Human Rights Policy and a Supplier Code of Conduct.

The Sustainability Framework is built around four pillars -Environment, Social, Governance and Sustainable Business Model Innovation - and nine major long-term goals, which are then progressed according to the business and geographical area. In particular, the Group has identified four priorities, which WINDTRE has taken into account in defining its ESG Goals for 2030.



Acting on climate change



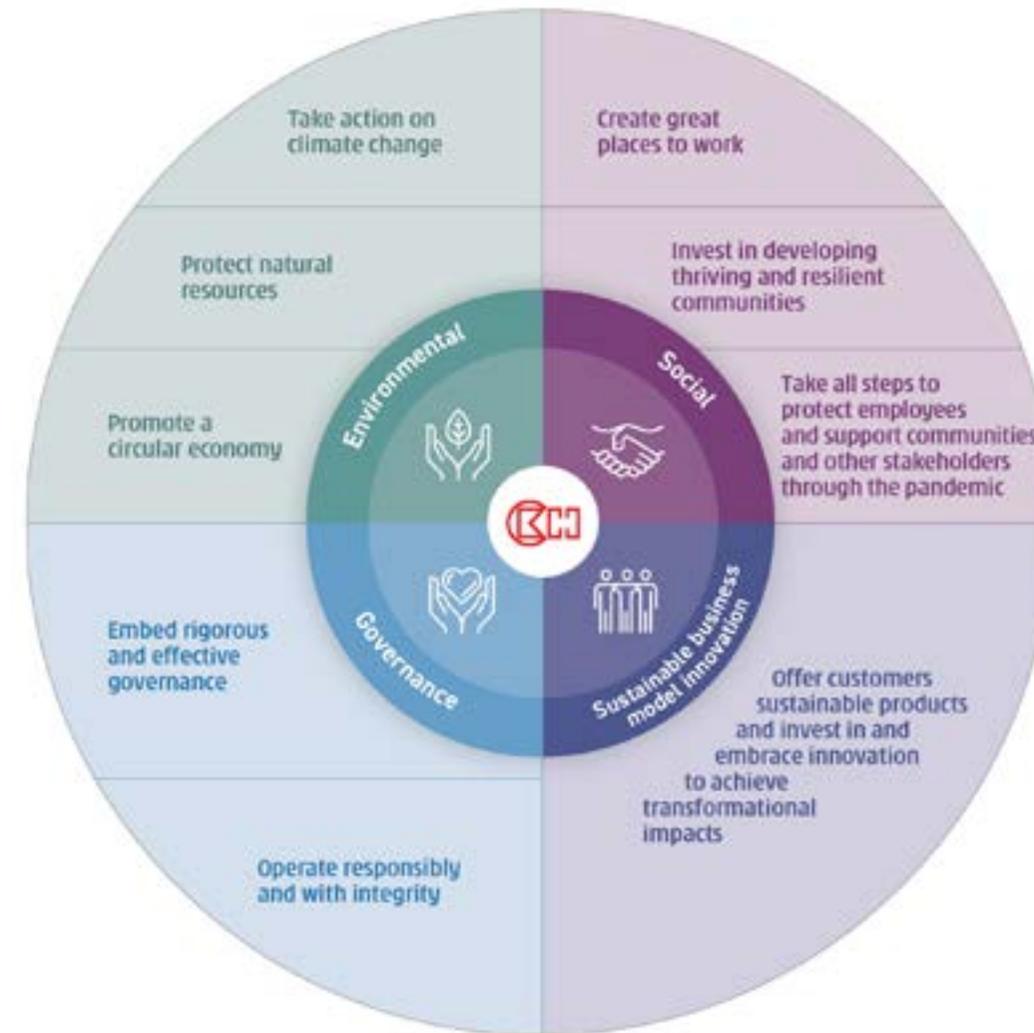
Create great places to work



Take all steps to protect employees and support communities and other stakeholders during the pandemic



Offer customers sustainable products and invest in and embrace innovation to achieve transformational impacts



CK Hutchison Group is committed to the initiatives and principles of corporate responsibility promoted by the **United Nations Global Compact**, in the areas of human rights, labour, the environment and the fight against corruption. As an affirmation of the company's commitment to achieving a more sustainable future, **WINDTRE also support the Global Compact.**

IDENTITY AND VALUES

PURPOSE



We exist to close the distances between people

Customer satisfaction is our biggest goal and we are always looking for new ways to improve it. We offer outstanding services at the right price

MISSION



VISION



We want to be the Telco company to choose every day to ensure a better life and future for all people

OUR VALUES



TRUST means believing in people

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



RESPONSIBILITY means setting an example, showing commitment and respect

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



INCLUSION means openness, listening, and being close to everyone's needs

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



COURAGE means not being afraid to face challenges with a positive attitude

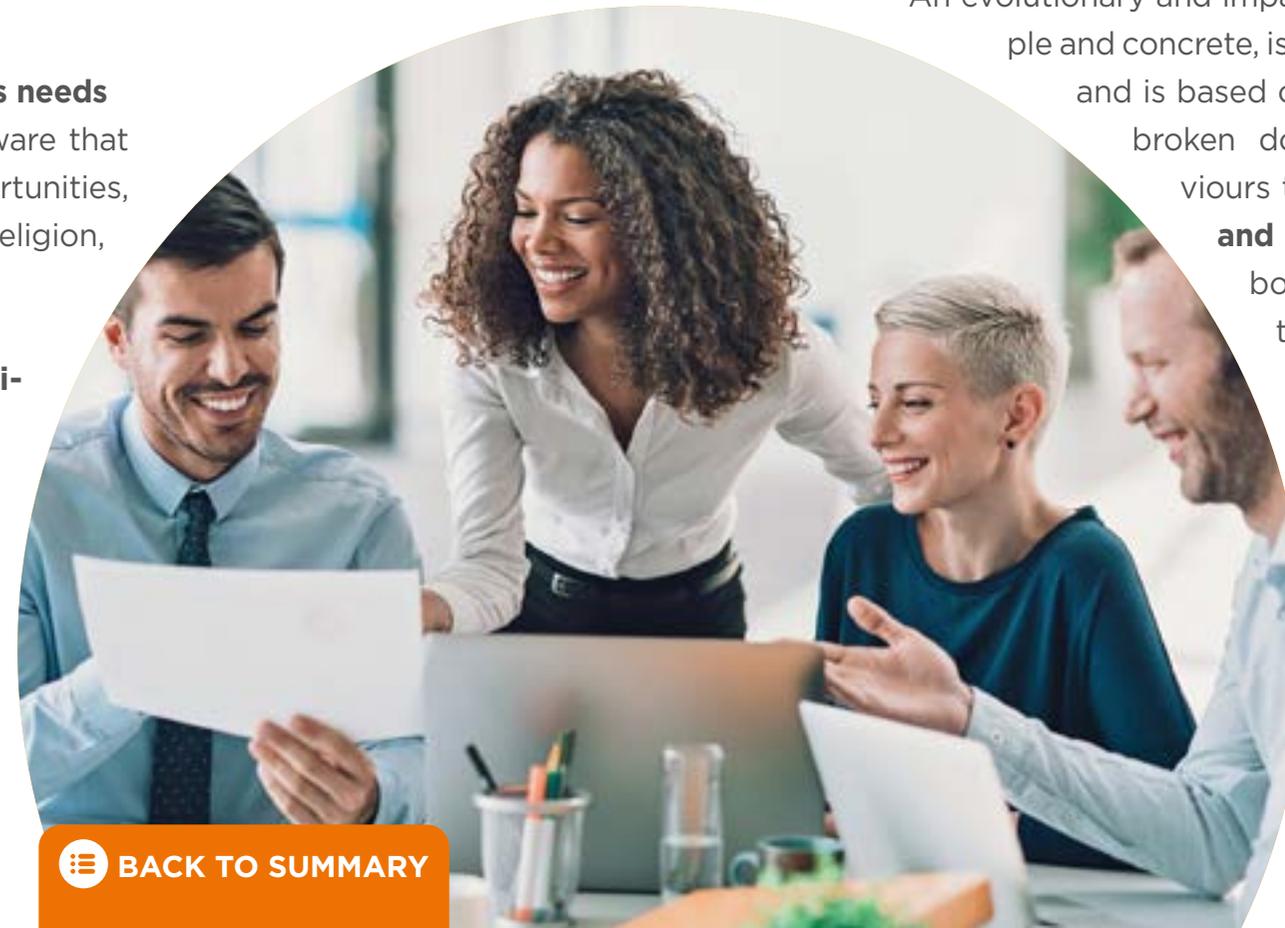
It means carrying out work with passion and determination, knowing that the quest for excellence is the only way to continuous improvement. Only by taking risks and leaving your comfort zone, can you innovate and make a difference, while always respecting objectives, processes and clients.

THE CITIZENSHIP MODEL

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

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

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



A TOP QUALITY NETWORK, A NETWORK OF PEOPLE



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

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

Awards and acknowledgements received in the field of human resource management:



For the fourth consecutive year, WINDTRE has been included in the **Top Employer Italia** ranking, which is reserved for companies that excel in the field of Human Resource management and development. The award is bestowed by the Top Employers Institute each year following a thorough screening process, and certifies the implementation of Best Practices focusing on the development and well-being of the company's personnel



WINDTRE is the first TELCO company in the world to receive **Equal Salary** certification. This attestation certifies pay equity between women and men, and confirms WINDTRE's implementation of solid Diversity, Equity, and Inclusion policies



WINDTRE has been recognised as one of **Italy's Best Employers for Women** and as a **Top Job Best Employer** by the German Institute for Quality and Finance, ranking among the top 300 Italian employers in terms of the values and career opportunities that the company has succeeded at promoting



At the **LinkedIn Talent Awards Italy**, WINDTRE received an award in the Best Employer Brand category for its distinguished efforts at building and engaging with audiences through the LinkedIn social network, and for its successful adaptation to the new working methods imposed by the pandemic



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



WINDTRE has been recognised as a **2022 Leader in Diversity** by Statista and the Financial Times thanks to its ability to promote diversity and to include minorities in its business practices

TOP QUALITY NETWORK

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

The WINDTRE mobile network is a modern infrastructure, consisting of 20,000 plants, which are capable of offering 2G, 3G, 4G and NBloT (Narrowband Internet of Things) services over a large geographical area, covering over 99% of the country's population.

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



WINDTRE's "Top Quality" mobile network covers 99.7% of the population in 4G, and 95.4% in 5G, with fast and reliable state-of-the-art infrastructure

With regard to the fixed network, WINDTRE is continuously investing in fibre optics, activating ultra-broadband services and technologies (FTTH-FTTC) thanks to agreements stipulated with wholesale partners. The FTTH coverage has been expanded, with 211 municipalities being reached as of December 2021, thanks to the company's partnership with Open Fiber which is responsible for providing the fibre optic connections.

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

In 2021 alone, more than € 600 million were invested in technological infrastructures to consolidate the 4G network and to prepare for the launch of the new 5G network.

That same year, 95.7% population coverage was achieved under 5G FDD (Frequency Division Duplexing)²¹ and the population coverage for 5G TDD (Time Division Duplexing)²² increased up 50.1% thanks to upgrades carried out at over 3,000 sites.

WINDTRE is experimenting with the **combination of 5G technologies with Edge-Computing and Artificial Intelligence.**

²¹ In telecommunications, frequency division multiplexing (FDM) is a network sharing technique that divides the entire available transmission channel (the band) into sub-channels, each with its own separate frequency band. This makes it possible for different devices using different frequencies to share the same channel and for users to communicate simultaneously without interference. The term Frequency Division Duplexing (FDD) means that the radio transmitter and receiver operate on different frequencies.

²² Likewise, with Time Division Multiplexing (TDM), each transceiver device in turn gets exclusive use of the entire band for a short period of time. Time Division Duplexing (TDD) separates outgoing and incoming signals.

These solutions can be exploited for the further development of Smart Cities and the IOT, such as for the management of multi-utility networks (energy, water, and waste).

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

- **5GMeta:** an open-source platform that collects the enormous amount of real time information generated by cars and drivers in order to develop innovative products and services.

- **5G-Induce:** the development project for an open-source 5G platform in which each developer can create and distribute customised applications with zero dependency on cloud service suppliers, and can offer Industry 4.0 solutions for the creation of production control automations.

- **SMART5GRID:** the experimental open-source 5G structure responsible for studying the possible synergies between 5G and the energy distribution network, to increase the quality of supply, improve the speed of network fault repairs, and promote service continuity.



5G

5G

WINDTRE has paid special attention to the development of 5G technology, a key factor in the digitalization of society and economy



600 MILLION EUROS

In 2021 alone WINDTRE has invested more than 600 Million Euros in technological infrastructures



MUCH
CLOSER
FOR A **MORE**
SUSTAINABLE
FUTURE

 [BACK TO SUMMARY](#)

OUR APPROACH

We at WINDTRE exist to close the distance between people because we know that together, united, we can do great things. That's why we work to enable and empower the most important network of all, the one made of people.

We want to be the telecommunications company to choose every day to ensure a better life and future for all, and we believe that technology is the key to a greater inclusion.

From the beginning of WINDTRE, we have invested 6 billion euros in our TOP QUALITY Network to ensure speed, reliability, equal access and a safer digital environment for everyone, including the most fragile.

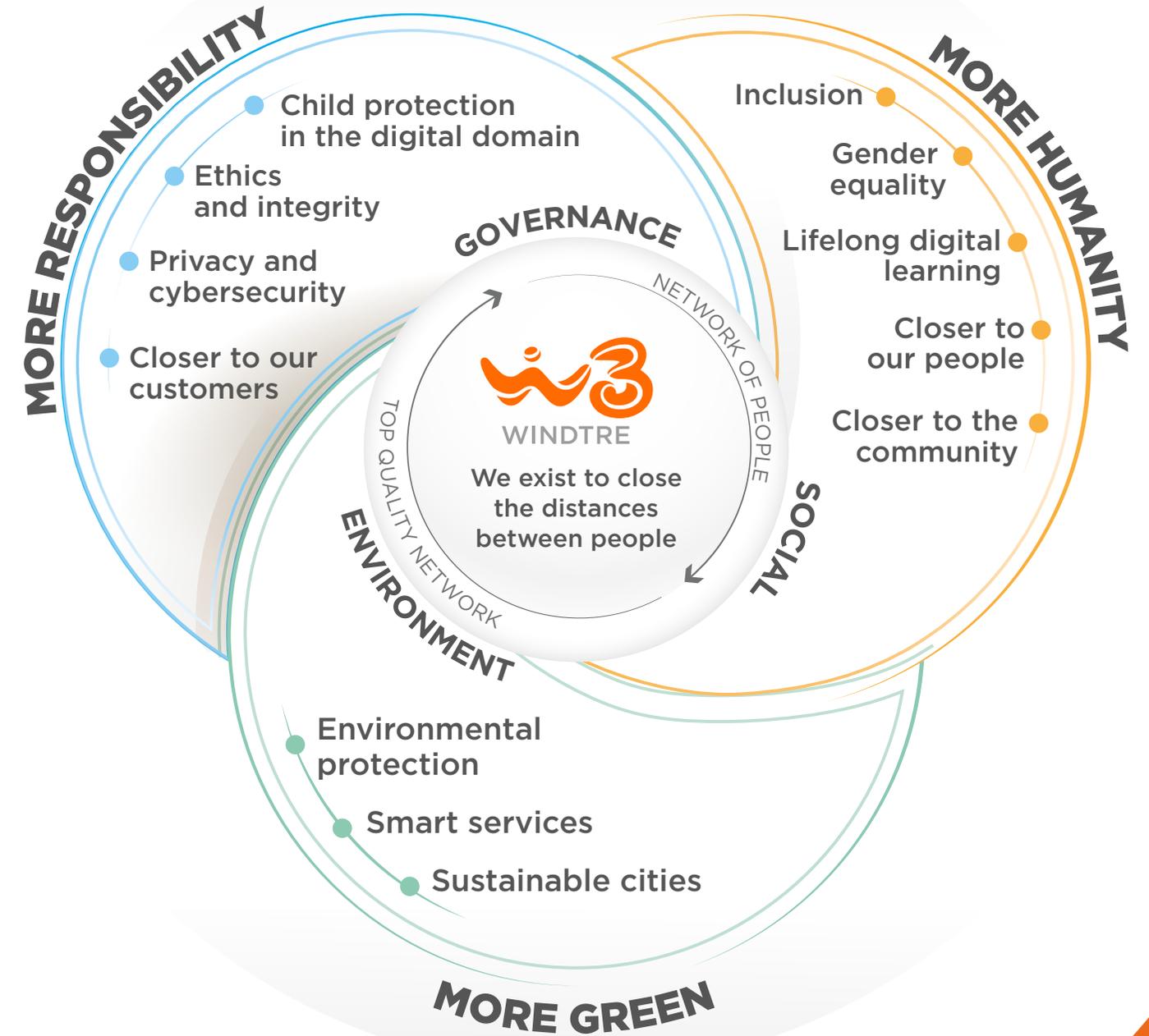
We believe in an inclusive technology that is also capable of improving the environment, health and quality of life. We work to reduce emissions and accelerate the transition to smart and sustainable cities, of which digital technologies are one of the main enablers.



TOP QUALITY

We place at the center the satisfaction of our customers and our people

MUCH CLOSER FOR A MORE SUSTAINABLE FUTURE



MORE RESPONSIBILITY, MORE HUMANITY, MORE GREEN

WINDTRE is committed to ensuring a more sustainable future by guaranteeing:

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

- **More humanity:** WINDTRE 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 WINDTRE, it is essential **to reduce and ultimately overcome the digital divide**, and for this reason the company is committed to developing a network that is accessible and affordable, above all for its own customers and marginalised communities, thus improving **equal access** and promoting equal opportunities for all. Inclusion also means access to adequate skills, which is why WINDTRE is committed to continuously providing learning opportunities designed **to prepare people for the challenges posed by digitisation**.

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



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DIGITAL DIVIDE

For WINDTRE, it is essential to reduce and ultimately overcome the digital divide

WINDTRE AND THE GOALS OF 2030 GLOBAL AGENDA

The pandemic has shown how crucial digital technologies are for a more inclusive society and a more innovative and sustainable economy.

In fact, **the ICT sector can make an extremely important contribution to the achievement of the goals of the 2030 Global Agenda**, as it represents an extraordinary driver of social, cultural, environmental, and economic innovation.

Thanks to our **continuous dialogue with our stakeholders**, we have established an approach to ESG issues that's aimed at maximising our positive impact on society and actively contributing to the achievement of the 2030 Agenda's Goals.

We intend to accompany all citizens in the transition to a **digital and interconnected society**, guaranteeing maximum **prevention and protection** against the multitude of risks that this can entail, especially for the most vulnerable. We want to help people **prepare for the future** by supporting the dissemination of the necessary skills, guaranteeing **equal access to the Internet**, and promoting digital technology as a tool for **inclusion**. We want to actively contribute to **protecting the planet** and improving people's quality of life by enabling a **fair and environmentally sustainable transition through our technologies**.



THE 2030 UN AGENDA

The 17 Sustainable Development Goals, which were introduced by the United Nations General Assembly in September of 2015 within the context of the 2030 Agenda, consist of 169 targets, and constitute a universal action plan for **“people, planet and prosperity”**.

They are essentially characterised by the fact that they are universal, interconnected, and indivisible: they must take specific territorial realities into account, and are potentially applicable everywhere, at the global, national, regional, local and urban levels.

They include numerous references to the well-being of individuals, and to the equitable distribution of the benefits of intra-generational and intergenerational development. One of the key principles is ***No one left behind***.

THE 2030 ESG PLAN



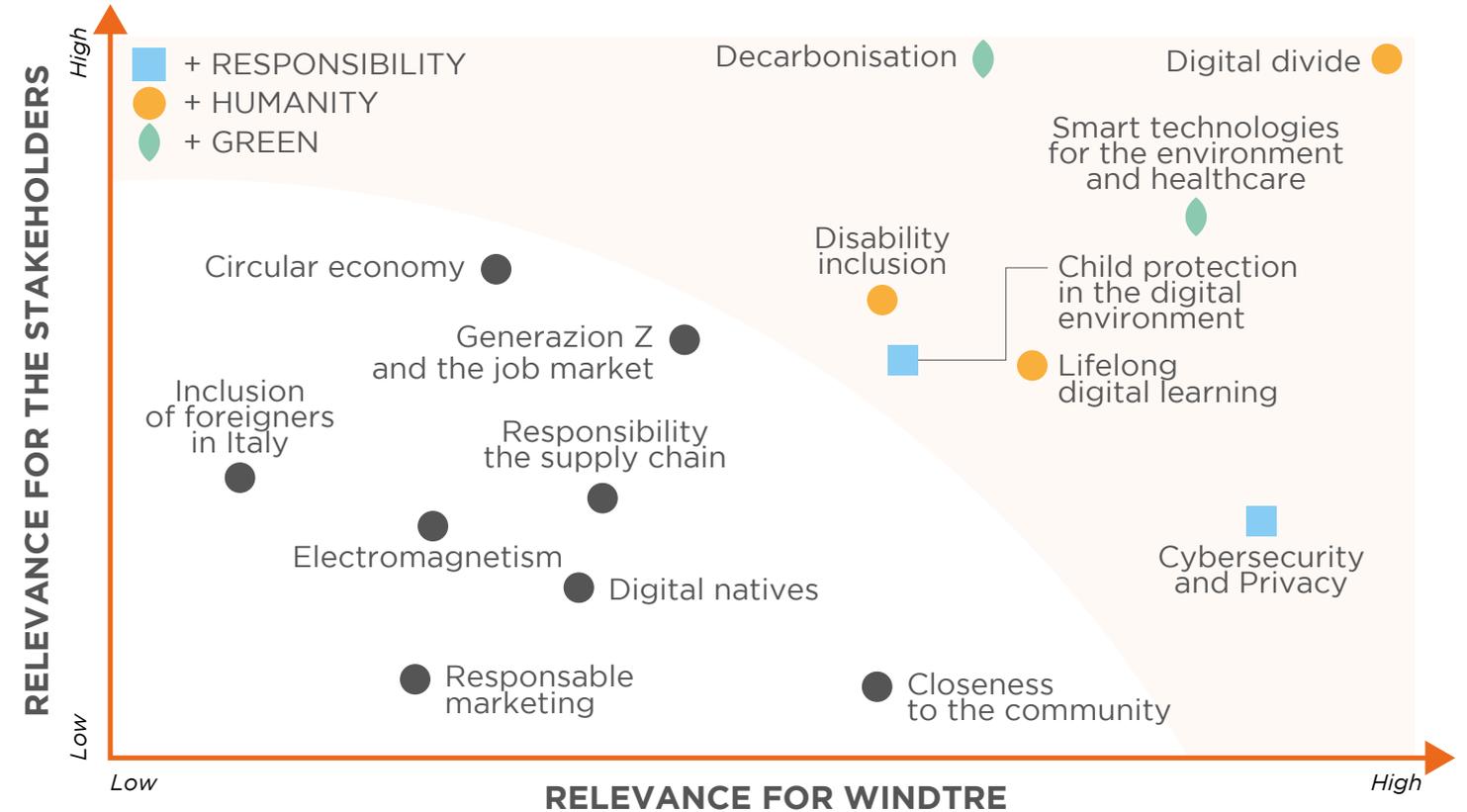
It's not easy to **establish a long-term vision during times like these, of rapid developments** and sudden changes.

However, in order to build a more sustainable and inclusive future, in keeping with the 2030 Agenda, WINDTRE believes that is essential to continue proposing new ideas and solutions. That's why, in 2021, **WINDTRE established a new ESG plan, with a horizon of 2025-2030: 10 challenging goals to close any distances between people.** The Plan's development began with **the identification of the sustainability issues that matter most for both the present and the future.**

Drawing inspiration from the most widely used reporting standards on a global scale, and thanks to discussions held with the WINDTRE stakeholders and management, we came up with the **7 key topics** upon which the sustainability narrative and programme would focus.

This process also served as an opportunity to shine a spotlight on the topics associated with WINDTRE's DNA, or rather the **identifying elements** upon which the company's ongoing commitment is based.

These topics - **network, people, customer relations, and ethics** - are essential for WINDTRE's activities of and are already key factors in its success. These four themes, consequently, were included from the outset in the "key themes" area, of which they are part together with the 7 identified in the Matrix.



Starting with the material topics identified, from the CK Hutchison Group Sustainability Framework, and from the most relevant SDGs, WINDTRE has launched an internal discussion to come up with its own ESG plan, which consists of 10 goals to be achieved between 2024 and 2030.

	HORIZON	TOPIC	AMBITION	SDGs		HORIZON	TOPIC	AMBITION	SDGs
<p>1 by 2025 FAMILIES 100% AWARE</p>	<p>2025</p>	Child protection in the digital domain	Raise awareness among families, including all generations, and positively influence their behaviour online, driving them to a safe and responsible use of technology	4, 9	<p>6 by 2025 GENDER EQUALITY</p>	<p>2025</p>	Gender equality	Ensure gender equality from hiring to the entire career within the company, in promotions or role changes, by nurturing an open and inclusive culture	5, 10
<p>2 by 2025 SENIORS 100% CONNECTED</p>	<p>2025</p>	Digital divide	Actively contribute to the digital inclusion of older people by putting our purpose into practice	3, 8, 9, 10	<p>7 by 2025 CONNECTED VILLAGES</p>	<p>2025</p>	Digital divide	Accompany the growth of small Italian villages thanks to connectivity and smart technologies	8, 9, 10, 11
<p>3 by 2025 100% "FUTURE READY" PEOPLE</p>	<p>2025</p>	Lifelong digital learning	Prepare WINDTRE's people for the challenges of the future by supporting their employability and investing in lifelong learning	4, 8, 9	<p>8 by 2030 SMART PARTNER OF 100 SMART CITIES</p>	<p>2030</p>	Smart technologies for the environment	Support local authorities in transitioning their municipalities to smart and sustainable cities	3, 7, 11, 12, 13
<p>4 by 2025 COMPANIES 100% SECURE</p>	<p>2025</p>	Cybersecurity and privacy	Protect our Business customers by using our cybersecurity and data protection solutions	9, 11, 17	<p>9 by 2030 100% CARBON NEUTRAL</p>	<p>2030</p>	Decarbonisation	Achieve carbon neutrality (scope 1&2) by 2030	3, 7, 11, 13
<p>5 by 2024 DIGITAL ACCESSIBILITY FOR PEOPLE WITH DISABILITIES</p>	<p>2024</p>	Inclusion of people with disabilities	Ensure that all information and customer support/assistance tools are easily accessible to people with disabilities	8, 9, 10, 11	<p>10 by 2030 CLOSER</p>	<p>2030</p>	Cross-cutting	Eliminating distances to be closer to WINDTRE people, customers and community bringing our purpose in action	-

THE SUSTAINABILITY GOVERNANCE MODEL

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

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

The guidelines and strategy to be followed are determined by the CEO and the Management Team. The **Sustainability Team** is responsible for facilitating and coordinating the Plan's progress, preparing the Sustainability Report, ensuring consistency with the Parent Company's strategy, and guaranteeing that the Plan's internal and external communications are consistent with the sustainability strategy.

Those responsible for the ESG Plan's implementation are the **Sustainability Ambassadors: WINDTRE top managers who operate in the various company areas**, and coordinate all the divisions involved in the process. They communicate with the Project Managers to determine the activities to be implemented, and interact with the Supporters to better coordinate the activities within the various departments.

The **Sustainability Project Managers** check that the activities for each goal have been implemented and monitor their progress in accordance with the guidelines shared with the Ambassadors. They also monitor the Supporters' activities and ensure that all the efforts are properly aligned, facilitating the resolution of any potential problems.

There are over 60 **Sustainability Supporters**, who are responsible for the activities carried out within a support function, and keep each Director up to date on the Plan's implementation.



A sustainability indicator was introduced to the **Short-Term Incentive Plan (STIP) with a horizon of 2021**, with the aim of engaging all the WINDTRE managers.

The indicator was set up as a composite index and consists of a mix of goals associated with the 2030 ESG Plan, regarding people (female leadership and training), the environment (reduction of CO₂ emissions and promotion of energy efficiency), and the sustainability Governance model.

In order to ensure consistency with the long-term perspective proposed by the 2030 ESG Plan, the sustainability indicator's goals regarding people and the environment have also been included in the **Long-Term Incentive Plan (LTIP)**, with a horizon of 2023.



SUSTAINABILITY IN THE INCENTIVE PLANS

In order to engage all managers, WINDTRE has introduced sustainability KPIs in the annual incentive plans

RISK MANAGEMENT

As required by the CKHH Group, WINDTRE has also adopted an organisational structure to oversee the **Enterprise Risk Management** process, which operates in accordance with the CKHH Group Policies and the international best practices. The company conducts a Risk and Internal Control Self-Assessment twice a year, which **also covers the ESG topics**. The aim of this assessment is:

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

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



MORE RESPONSIBILITY

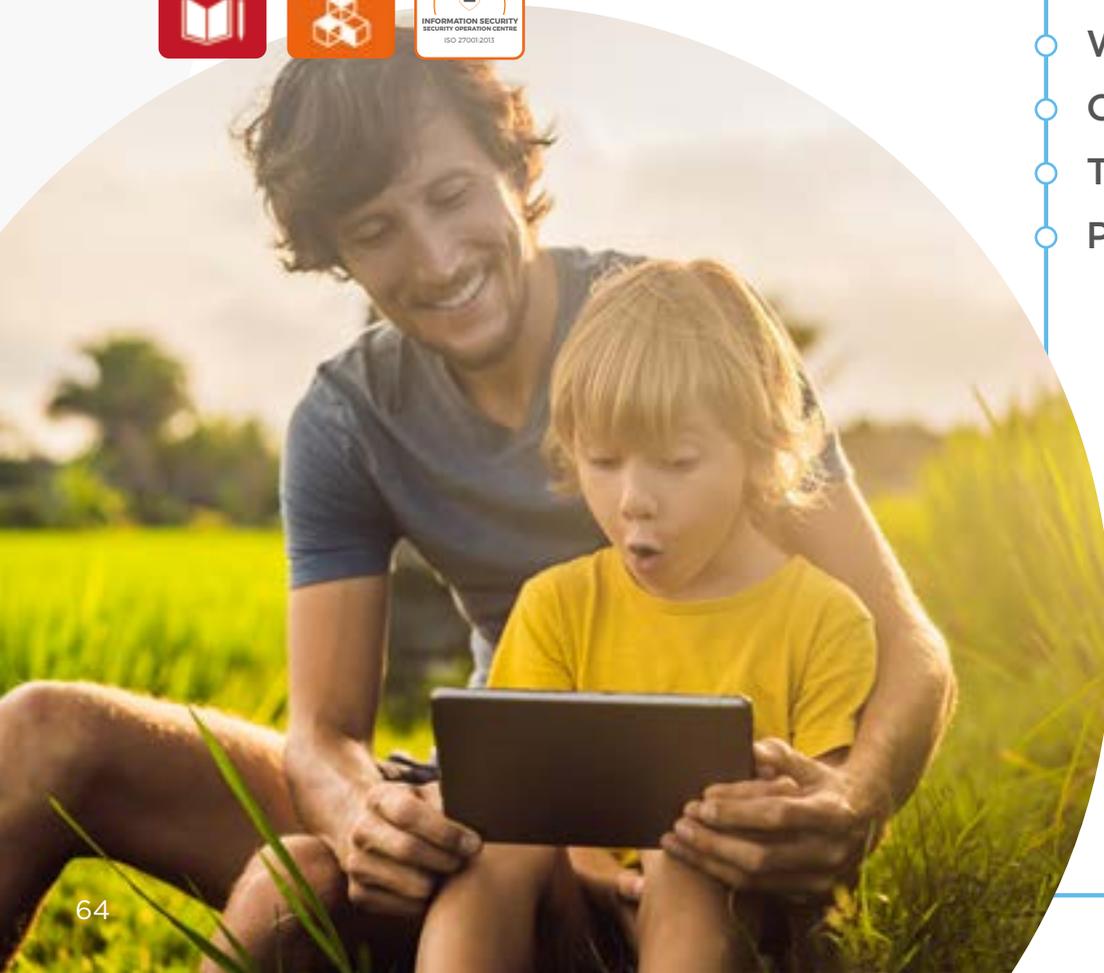
DIGITAL RESPONSIBILITY

- Child protection in the digital domain
- Cybersecurity and privacy

BUSINESS ETHICS AND INTEGRITY

CLOSER TO OUR CUSTOMERS

CHILD PROTECTION IN THE DIGITAL DOMAIN



- What it means to us
- Why it's important
- Our goals
- The NeoConnessi project
- Parole O_Stili project

WHAT IT MEANS TO US



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



Providing younger users with the tools needed to recognise and protect themselves against abuse, false information or violence, **in order to avoid harmful situations and online threats 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

WHY IT'S IMPORTANT

The digital environment has become the place where young people spend most of their time, sharing ideas, and interacting with other kids. However, **this increase in digital interaction**, which has mainly been driven by the pandemic and the forced closure of schools and entertainment venues, has had **major repercussions for younger children**, who report an **increased sense of loneliness**.

Kids are frequently left on their own with Internet connected devices, without adult supervision: 6 out of 10, elementary, middle school and high school students claim to use an Internet connected device on their own.²³The well-being of children online is one of the European Union's priorities, which, thanks to the Better Internet for Kids strategy, is co-funding Safer Internet Centres (SICs) throughout Europe, organising awareness campaigns, providing training to families and schools, and managing telephone support services to answer questions about how to react to dangerous situations, such as the online soliciting of children²⁴.

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

For this reason, the **NeoConnessi** digital and media education project was launched in 2018, which **provides teachers and parents with support during the delicate time when their students/children are starting to use the Internet on their own.**

²³ Istituto Piepoli-MOIGE: *Amid digital technologies and cyber risks: risks and opportunities of the web*, 2022

²⁴ European Commission: *Better Internet for Kids*, 2021



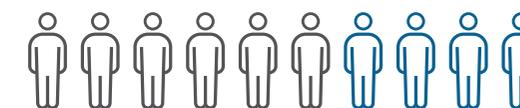
41%

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

+34%

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

(Istituto Piepoli, 2022)



6 out of 10

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

(Osservatorio Indifesa, 2020)



NEOCONNESSI

The digital and media education project testifying WINDTRE's commitment to DIGITAL RESPONSIBILITY

OUR GOALS

FAMILIES 100% AWARE - BY 2025



TOMMASO VITALI

Sustainability
Ambassador

Head of
B2C Marketing
& New Business

“We want to raise awareness among families, including all generations, and positively influence their behaviour online, driving them to a safe and responsible use of technology”

COURSES OF ACTION

Improvement of the NeoConnessi project through the involvement of a greater number of schools and the enrichment of the offering with new teaching and training tools

Communication campaigns aimed at raising awareness on the issue of digital responsibility

Development and dissemination of digital security solutions for the protection of smartphones and devices designed for fixed connectivity

Development and dissemination of solutions designed to allow parents to monitor and protect their children

WHERE WE ARE AT

NeoConnessi: nearly 9,000 fourth and fifth grade primary school classes involved in the project throughout Italy, with the aim of involving another 14,000 during the 2021-2022 edition

3 webinars on responsible use of the Internet: Children and Cyber security. Using the web safely - Children and online searches; how can you recognise fake news and obtain information safely? And Beyond the Screen. Digital technologies today, amid remote learning and gaming

10 principles for communicating online: the renewed commitment of the “Manifesto of non-hostile communication” to promote online respect and protection in Internet

NEOCONNESSI
Molto più vicini in rete

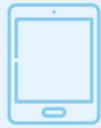
The Internet and social media are now an integral part of young people’s daily lives, because they offer countless resources for learning, as well as for participation and creativity, but at the same time pose lots of new challenges. The pandemic and the relative school and business closures accelerated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



Now in its fourth edition, **the NeoConnessi project** promotes a common consideration among the three main players in the educational process (children, teachers, and families), all of whom share the same intentions regarding the safe and responsible use of the Internet and digital technologies.

With **the 2021/2022 edition, the project aims to reach 7,000 schools and to engage with 14,000 4th and 5th grade primary classes** throughout Italy, offering a series of stimulating new tools to guide children on their discover of the digital world, and to help them develop responsible behaviour. One of these 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





VISIT THE WEBSITE



identity, cyberbullying, and Internet security. The reading and subsequent discussion of the story in the classroom and within the family is intended to provide food for thought, in order to stimulate digital awareness.

For the teaching staff, who play a key educational role, WINDTRE has made available a free training course 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.



This course is free of charge, and is recognised by the Ministry of Education, Universities and Research for the purposes of in-service training pursuant to the Ministerial Decree no. 170 of 21 March 2016.

As with the previous editions, the NeoConnessi project will render available **the NeoConnessi.it platform**, which offers additional educational resources and interdisciplinary activities for teachers and parents. The **Facebook Group NeoConnessi - Parents, Children and Internet** also remains active, offering an increasingly wide range of content, and providing parents with a community of users with whom they can discuss the project's key topics.

Furthermore, in order to help the elderly, become more familiar with technology, in 2021 WINDTRE decided to extend the NeoConnessi project by **making a new section of the portal available to people Over 60: NeoConnessi Silver.**

THE NEOCONNESSI PROJECT'S FIGURES:

Neoconnessi - classes involved	s.y. 2020-21	s.y. 2019-20	s.y. 2018-19
Primary school No. of classes involved	5,140	digital edition	3,750



Polizia di Stato



THE TOOLS OF NEOCONNESSI

- an educational kit
- a web platform: www.neoconnessi.it
- a Facebook group
- a teachers' course

PAROLE OSTILI

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

This charter lists **ten principles to improve the communication and behaviour of people who use the Internet.**

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



The Manifesto of Non-Hostile Communication

- 1. Virtual is real**
On the Internet, I only write or say what I would dare to say in person.
- 2. You are what you communicate**
The words I choose define who I am. They represent me.
- 3. Words shape the way I think**
I take all the time I need to express my views in the best possible way.
- 4. Listen before you speak**
No one can always be right, and nor am I. I listen, with an honest and open-minded attitude.
- 5. Words are bridges**
I choose words to understand, make myself understood and get close to others.
- 6. Words have consequences**
I am aware that what I say or write can have consequences, small or serious.
- 7. Share with care**
I share texts and image only after I have read, assessed and understood them.
- 8. Ideas can be discussed. People must be respected**
Those whose views and opinions differ from mine are not enemies to be destroyed.
- 9. An insult is not an argument**
I accept no offensive and aggressive words, even if they support my point of view.
- 10. Silence says something too**
When it's better to keep quiet... I do.

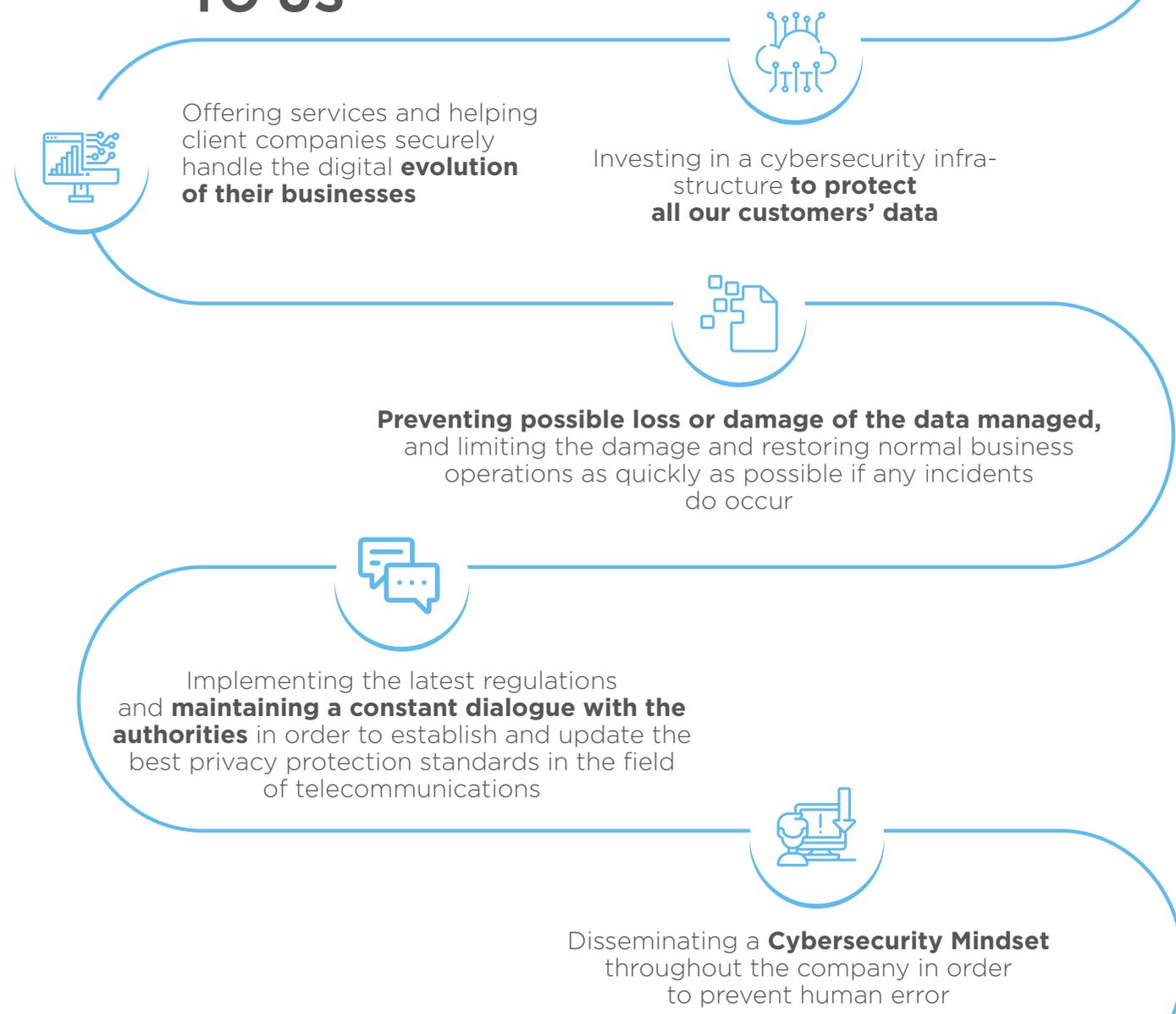
CYBERSECURITY AND PRIVACY



- What it means to us
- Why it's important
- Our goals
- Increasingly resilient
- The H factor
- Data protection



WHAT IT MEANS TO US



WHY IT'S IMPORTANT

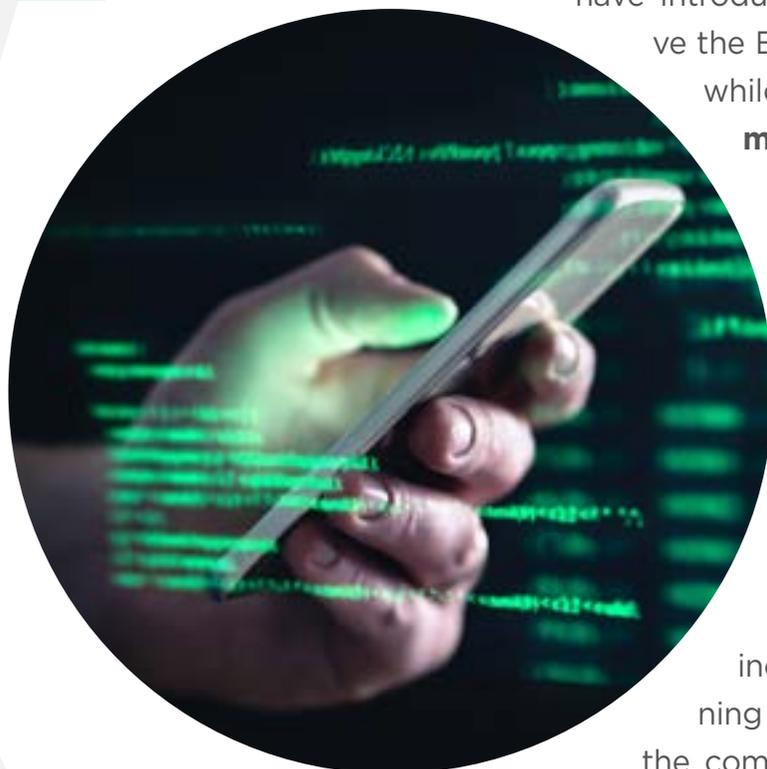
Digitisation brings with it a growing risk of cyberthreats. **The cost of cybercrime around the world reached record levels in 2020, generating economic losses of \$ 945 billion²⁵.** Even more important are the losses caused by cyber-attacks, affecting the personal and sensitive data held by companies. In fact, this information is increasingly becoming a valuable asset to be protected, which requires appropriate investments to be made in infrastructure innovation and improvement. Both the EU and Italy have established new policies to fight cybercrime and to improve cybersecurity. For their part, the European Union and the European External Action Service (EEAS)

have introduced the Cybersecurity Strategy to improve the EU's resilience in the face of cyber threats²⁶, while **Italy has allocated approximately € 620 million in investments, within the context of its National Recovery and Resilience Plan**, aimed at improving the cybersecurity level of the Public Administration²⁷.

The telecommunications sector is particularly prone to this threat. The exponential increase in the number of IoT devices connected to the carriers' networks (above all 5G networks) and cloud infrastructures, has gone hand in hand with the increased risk of cyberattacks, thus undermining data protection. The need to supplement the company policies with an IT security strategy

620 BILLION EUROS

The investment, within the context of the National Recovery and Resilience Plan (PNRR), aimed at improving the cybersecurity of the Public Administration



²⁵ McAfee: *The Hidden Costs of Cybercrime, 2020*

²⁶ European Commission (2020): *The EU's Cybersecurity Strategy for the Digital Decade*

²⁷ Law 101/2021: *The National Recovery and Resilience Plan (PNRR)*



+12%

The increase in the number of cyber-attacks around the world in 2020, compared to 2019
(McAfee, 2020)

42%

The percentage of telecommunications companies worldwide that have suffered cyber-attacks based domain systems in 2019

(IDC, 2019)

€1.37 billion

The value of the Italian cybersecurity market in 2020, +4% compared to 2019

(Osservatorio Politecnico Milano, 2021)

can no longer be postponed. Companies in the TELCO sector can make an enormous contribution by working to improve their network security, both internally, in terms of infrastructure resilience, and externally, in terms of protection against cyber-attacks caused by IoT devices, which are not always secure and compliant.

Finally, in order to ensure full compliance with the General Data Protection Regulation, facilitate the functioning of processes and infrastructures, and update the operators' competences, it's important to constantly **monitor for any changes to the personal data protection legislation**. Data protection can be incorporated within a Corporate Digital Responsibility (or CDR) system, which entails the use of a series of practices and behaviours designed to ensure the responsible use of data and technology from a social, economic, technological and even environmental perspective.



OUR GOALS



COMPANIES 100% SECURE - BY 2025



FABIO PICCINI

Sustainability Ambassador

Head of Technology Infrastructures & Systems

“We want to protect our Business customers by using our cybersecurity and data protection solutions”

COURSES OF ACTION

Release of security packages for SMEs with dedicated firewall and anti-spam solutions, as well as vulnerability assessment and management

Development of self-assessment tools, to analyse the customer's security status and to identify the best solutions

Implementation of an integrated infrastructure to provide customers with active security services

Improvement of security awareness through simulation and monitoring activities aimed at highlighting vulnerabilities that can be exploited by an attacker

WHERE WE ARE AT

€ 18 million invested in 2021 alone for improved network security, customer solutions, and the cloud transition

Security by Design: improved risk prevention and mitigation processes

Human Factor: staff training to develop a Cybersecurity Mindset

Implementation of a **Business Continuity framework** to identify potential threats and improve resilience

Numerous on-site checks on external Managers on privacy themes

MORE RESILIENT



The pandemic marked the start of an unprecedented push towards digitisation, as more and more businesses and users began interacting with digital infrastructures. With the growing in data exchanged between these entities, the number of cyberattacks has also increased. Companies and regulatory authorities are holding discussions on IT security in order to establish a reference regulatory framework to guarantee IT security. **WINDTRE's collaboration with the institutional bodies responsible for cybersecurity therefore continued in 2021**, as did the internal activities of reviewing the cybersecurity management framework and the development of processes and technical solutions to protect customer data and WINDTRE.



CYBERSECURITY

In 2021 alone, WINDTRE invested about €18 million in services and platforms for data and systems security



In 2021 alone, WINDTRE invested about € 18 million in services and platforms for data and system security, focusing on three lines of development:

Network Security - WINDTRE has integrated its platform distribution activities with various **testing campaigns** (Vulnerability Assessments/Penetration Tests), with the aim of bolstering the security safeguards in order to protect the network systems. The company also took part in the **various institutional round table discussions** in order to contribute to the drafting and interpretation of the proposed law for the National Cybersecurity Perimeter. The goal of this bill is to establish a constant and effective relationship between institutions and companies, which will be based on two fundamental principles: the protection of national security (a primary requirement of every country), and the development of the 5G network (a key infrastructure for the future growth of our economy).

Customer solutions - The technologies, skills and processes developed by WINDTRE 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. Thanks to the skills and technologies developed internally, WINDTRE is able to offer its **B2B customers dedicated IT security management services**, which have come to be considered increasingly urgent during the pandemic.

Cloud Transition - Business processes are increasingly making greater use of cloud technologies. In order to facilitate the transition to these technologies and provide its customers with the highest levels of cybersecurity services, WINDTRE has decided to renovate its security infrastructure, placing maximum atten-



tion on the design, implementation and monitoring processes.



The **Cyber intelligence activities** played a fundamental role during the course of the year by monitoring the alert bulletins on potential cyber threats issued by the national and international institutions. The main role in this area is played by the **Security Operations Centre (SOC)**, the WINDTRE 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 2021 WINDTRE continued to **bolster its risk prevention and mitigation processes by implementing the principles of Security by Design**, which means envisaging security criteria proportionate to the level of exposure of the company's and its customers' data right from the initial requirement definition stages. These same principles are implemented throughout the supply chain, where specific checklists are used to verify that the suppliers have also adopted specific data protection measures.



SECURITY BY DESIGN

Ability to predict security criteria on the basis of the exposure of customers' data

THE H FACTOR



Digitisation has led to an increase in the number of cyberattacks suffered by companies. **The so-called H factor (Human Factor) is one of the main causes of security incidents**, however, and remains a major cybersecurity weakness for most companies. That's why it is important to disseminate a **Cybersecurity Mindset** throughout the company. This can be done by taking action on two levels: **awareness**, which leads people to become more aware of their own behaviour, and **learning**, in order to encourage the acquisition of new knowledge and the adoption of virtuous behaviours, in order to mitigate cyber threats and the inherent dangers associated with technology. In keeping with the Group's guidelines, the current regulations, and the best practices, WINDTRE has carried out awareness-raising and training initiatives on cybersecurity issues for all of its staff.

By monitoring the regulatory changes and engaging with the competent authorities on the topic of cybersecurity, WINDTRE constantly adapts its processes in order to implement measures that are increasingly effective at preventing and responding to cyber-attacks. To mitigate the new risk scenarios, an intelligence driven approach is most effective for reducing incident response times and, more generally, for keeping up to date on what's happening within the national and international regulatory context. For this reason, **WINDTRE has begun investing 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. The initiative has been extended to third parties, in keeping with the security requirements that WINDTRE has established.



STRATEGIC CYBERTHREAD INTELLIGENCE

Anticipate threats by involving suppliers and partners

Finally, in order to improve the resilience of the processes, WINDTRE is currently finalising the **implementation of its Business Continuity framework**. Business Continuity can be understood as an organisation’s ability to continue delivering its products or services at acceptable predefined levels following any adverse events that may occur. The company is investing in the creation of a framework that allows potential threats to be identified, and simultaneously improves its resilience and ability to effectively respond to adverse events.

DATA PROTECTION



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

The company has taken all the measures necessary to ensure the security of the data, as well as compliance with the latest privacy and cybersecurity legislation, in the interests of both the company itself and its customers. With regard to both the Italian and European legislative contexts, the company’s policy on privacy and data security is primarily aimed at **ensuring regulatory compliance**, taking into account the introduction of the General Data Protection Regulation

(GDPR), approved in 2016 and effective since 2018, and the guidelines regarding cookies recently issued by Italy’s Data Protection Authority. WINDTRE undertakes to prevent any potential loss or damage to the data managed, to limit the damage and restore normal business operations as soon as possible in the event that any accidents should occur.

Thanks to the harmonisation processes conducted in recent years, WINDTRE 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.

To this includes a verification activity, which is conducted via a self-assessment system by all the suppliers appointed as Data Processors through a dashboard, which became electronic in 2021, thus allowing the self-assessment questionnaires sent out to all the WINDTRE partners to be rapidly disseminated and processed.

During the course of the year, **the company paid greater attention to critical infrastructures, implementing new monitoring and verification processes** compliant with the national security regulations, and namely with the “Measures for ensuring the security and integrity of the electronic



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GOVERNANCE RISK MANAGEMENT COMPLIANCE

It allows to monitor the processing of data throughout the entire supply chain



FOCUS ON INFRASTRUCTURES

New monitoring and verification processes in line with national security regulations

communications networks and the reporting of significant incidents” established by the Ministry for Economic Development in 2018.

WINDTRE complies with the requirements of the Personal Data Protection Authority (GPDP) concerning proper data management in terms of authorisation for processing, profiling, data enrichment, and data transfers. The company maintains a fully cooperative relationship with the GPDP in order to determine the best standards for the telecommunications sector in terms of privacy protection.

Within the context of its responsibilities as Data Controller, WINDTRE has **increased the supervision of its External Data Processors** by enacting strict procedures and thorough processes, in order to guarantee total governance of the data under its control.

The inspections were conducted on site, in compliance with the emergency measures in place during the pandemic.

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



DATA PROCESSING

Strengthened supervisory activities, with strict procedures to ensure the protection of the Data Controller

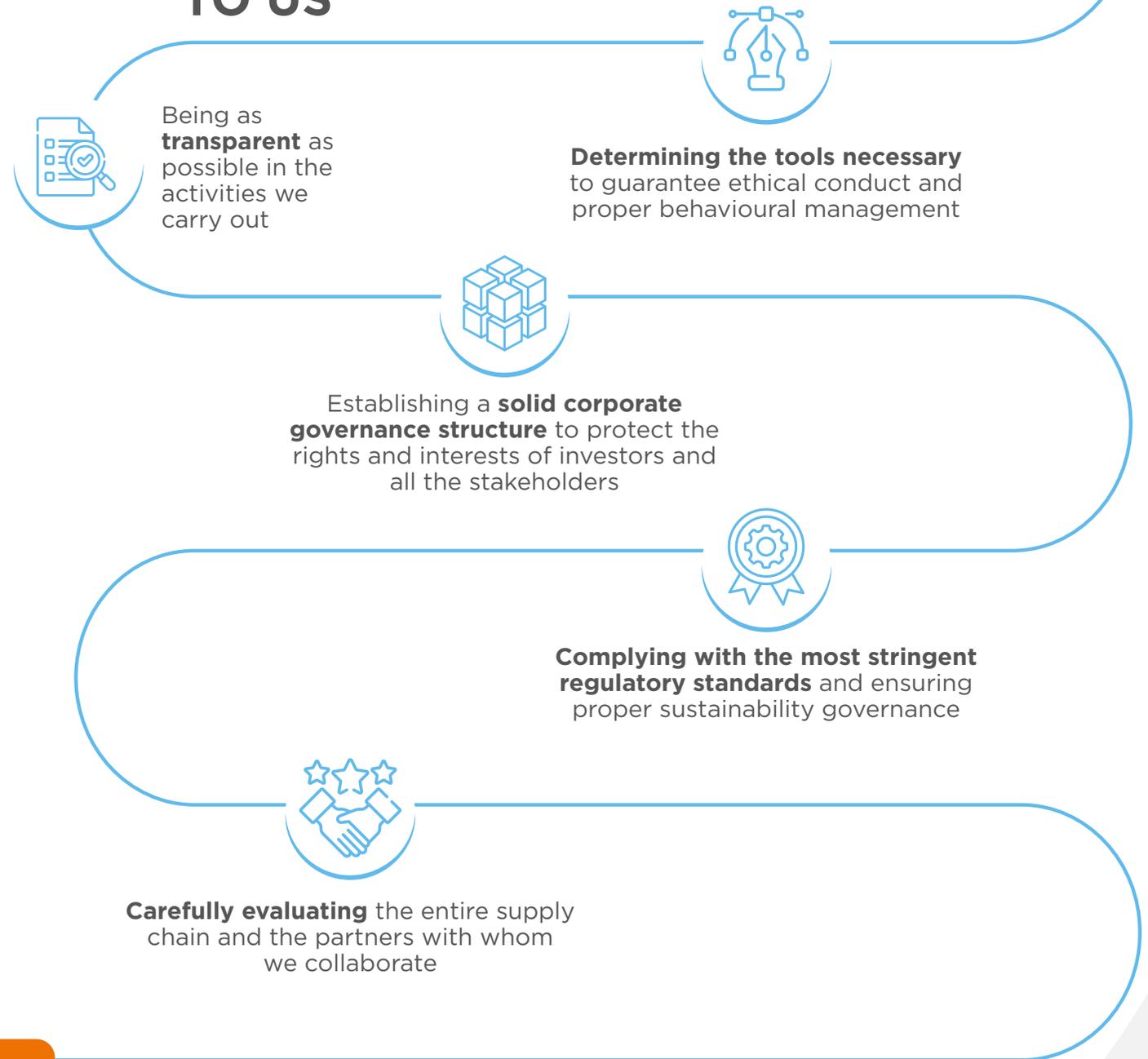
Inspections by the Data Protection Authority (no.)	2021	2020	2019
Number of inspections	-	-	1
Data Breach [GRI 418-1b]	2021	2020	2019
Events detected by WINDTRE	4	3	7
Proceedings	2021	2020	2019
Known to WINDTRE before the Authority	0	1	1
Verifiche sui fornitori in tema di privacy (n.)	2021	2020	2019
On-site audits	67	13	8
Verification questionnaires administered to external suppliers	466	321	258
Verification questionnaires administered to sales agents	4,884	6,017	6,527

BUSINESS ETHICS AND INTEGRITY



- What it means to us
- Why it's important
- Governance instruments and management systems
- The Global Compact
- The Plan's Governance Model
- Fight against corruption and conflicts of interest
- Whistleblowing
- A responsible supply chain
- Total Quality Management

WHAT IT MEANS TO US



WHY IT'S IMPORTANT

Companies are increasingly recognising the role that they play in the socio/economic development of their countries, and the importance of having a management system based on values that people consider to be fundamental. Now more than ever, **companies should commit to adopting governance systems that take social and environmental sustainability into consideration.** But that's not all: corporate ethics also serve as an added value for attracting the greatest talents, especially those of the new generation, for whom principles like sustainability and inclusion are a priority at the workplace.

According to a study involving over 500 companies worldwide, management and employees both consider good governance, ethics, and transparency to be among the most important corporate values. In keeping with the results of 2020, having been indicated by about 1 out of 3 companies, Integrity was once again the most frequently cited individual value in 2021, followed by respect as a core corporate value²⁸. Consumers, on the other hand, tend to carefully evaluate the relationship that's established with the supply chain: **6 out of 10 Italian consumers evaluate a brand based on its relationship with its suppliers**²⁹.

The adoption of a **code of ethics** or specific **codes of conduct** are the first steps towards the implementation of sustainable governance, as they also render the company's work and commitments visible externally. The latest version of the Corporate Governance code for listed companies from 2020 marks a fundamental step in highlighting the important role that sustainability plays within the company. The Code introduces the concept of "sustainable success" for the first time, defining it as the management body's guiding objective for creating long-term value for the benefit of the shareholders, which also takes into account the interests of other stakeholders relevant to the company³⁰. In order to achieve these objectives, it is also essential to establish an ESG Committee: a tool that's becoming increasingly widespread among organisations that are already sustainability oriented.

²⁸ Amo: Values Most Valued, 2021

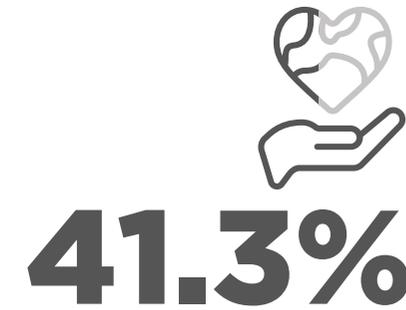
²⁹ OpenText: Ethical Supply Chain, 2021

³⁰ Borsa Italiana: Corporate Governance Code for Listed Companies, 2020



SUSTAINABLE SUCCESS

It is defined as the management body's guiding objective for creating long-term value



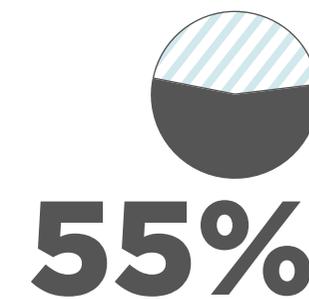
The percentage of companies around the world that consider Ethics and Integrity to be a fundamental corporate value

(Amo, 2021)



The percentage of Italians who say they prefer to purchase from companies that have adopted ethical sourcing strategies

(OpenText, 2021)



The percentage of the Boards of Directors of listed companies that developed sustainability skills and/or carried out induction activities relating to sustainability in 2021

(The European House Ambrosetti, 2021)

GOVERNANCE INSTRUMENTS AND MANAGEMENT SYSTEMS



WINDTRE 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 company's staff can follow the behavioural guidelines contained in the **Code of Conduct**, in order to bolster the company's credibility and reputation within the context in which it operates.

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

In 2021, WINDTRE **increased its score in the EcoVadis rating** (one of the world's largest corporate sustainability assessment providers) **by 26.8% compared to 2020**. The Ecovadis assessment focuses on four areas:

environment, worker protection and human rights, ethics, and sustainable procurement. WINDTRE's score was higher than the average of the 397 TELCO companies analysed by the rating, and this was due to the goals it has achieved, as well as the establishment of the new ESG Plan, with a horizon of 2030.

THE GLOBAL COMPACT

Since 2021, WINDTRE has been committed to the initiatives and principles of corporate responsibility promoted by the United Nations Global Compact, in the areas of human rights, labour, environment and fight against corruption.

THE ESG PLAN'S GOVERNANCE MODEL

Those responsible for the corporate ESG Plan's implementation are the **Sustainability Ambassadors**: the top managers of the competent corporate areas, who also coordinate all the other divisions involved. For this purpose, the Ambassadors have appointed **Project Managers** to manage the activities, and **Supporters** to serve as project contacts within the various departments.

Each quarter, with the support of the **Sustainability team**, the progress of the plan is analysed, and any necessary adjustments are made. The integration of the ESG plan into the corporate business activities also entailed the insertion of indicators for each goal within the management incentive plans for both 2021 and 2022.



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+26,8%

The increase of WindTre's score in EcoVadis, one of the world's largest corporate sustainability assessment providers



SUSTAINABILITY AMBASSADORS

Top manager of business areas, responsible of the implementation of the ESG Plan

FIGHT AGAINST CORRUPTION AND CONFLICTS OF INTEREST

WINDTRE 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, WINDTRE established an **Anti-Fraud and Anti-Corruption Policy** that describes the concepts and ethical standards to be respected during the management of the company's activities in order to mitigate the relative risks and ensure compliance with the current standards and regulations, drawing upon the organisation's best practices. In 2021, WINDTRE adopted its **Anti-Fraud and Anti-Corruption Guidelines for Suppliers**, which establish the ethical principles and minimum control standards with which all WINDTRE suppliers and any third parties involved in contractual relationships with WINDTRE must comply in order to prevent and combat fraud and corruption, and guarantee compliance with the current regulations.

WINDTRE has established a **Due Diligence Procedure** for its business partners which, in line with a "Risk Based" approach, is applied before the establishment of a new business relationship or in the extension / renewal of an existing relationship, with respect to third parties considered more sensitive to the risk of non-compliance of the anti-corruption legislation and therefore more subject to reputational risks. As an example and not limited to, the suppliers in the procurement area, consultants, business sales agents are subjected to due diligence. **304 due diligences procedures were carried out in 2021.**

At the same time, WINDTRE established a **Donations and Sponsorships Procedure** and a **Gifts and Hospitality Procedure**, which determine methods according to which these initiatives are managed, in compliance with the current laws, and the principles of ethics, professionalism, transparency, correctness and fairness, which the company seeks to uphold in its fight against corruption.

In 2021, in-depth analyses were carried out to all donations and sponsorships of the year, in particular: **8 donations and 24 sponsorships** aimed at bolstering WINDTRE's reputation and image in the social and environmental contexts in which it operates.

Finally, in 2017 WINDTRE adopted a **Conflicts of Interest Policy** in order to provide guidelines for identifying any actual or potential conflict of interest situations, and to establish the relative communication and management process. Using a special digital platform on the company's intranet, all employees must declare whether they find themselves in any situations that effectively or could potentially constitute an actual or potential conflict of interest. If any changes should take place regarding the content of their most recent declarations, the employees must promptly notify the company by changing their declarations via the platform. WINDTRE reserves the right to conduct a periodic survey of the employees' conflicts of interest. The **survey of the managers' conflicts of interest** was carried out in 2021.



CONFLICT OF INTEREST

A digital platform allows employees to report the presence or absence of situations that could generate conflicts of interest



DUE DILIGENCE

The analysis procedures through which WINDTRE evaluates and selects the business partners with which it comes into contact

WHISTLEBLOWING

GRI 102-17

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

The procedure provides for **various communication channels to be used by employees and third parties** in order to report actual or potential unlawful conduct, even anonymously: an online platform, an e-mail address for the Supervisory Bodies, and an e-mail address managed by the Audit, 231 Compliance & Risk Management Department. The web platform is managed by a third party company, which guarantees absolute confidentiality to the whistleblower using IT means (pursuant to art. 2 paragraph 3 of Italian Law no. 197/2017).

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

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

A RESPONSIBLE SUPPLY CHAIN

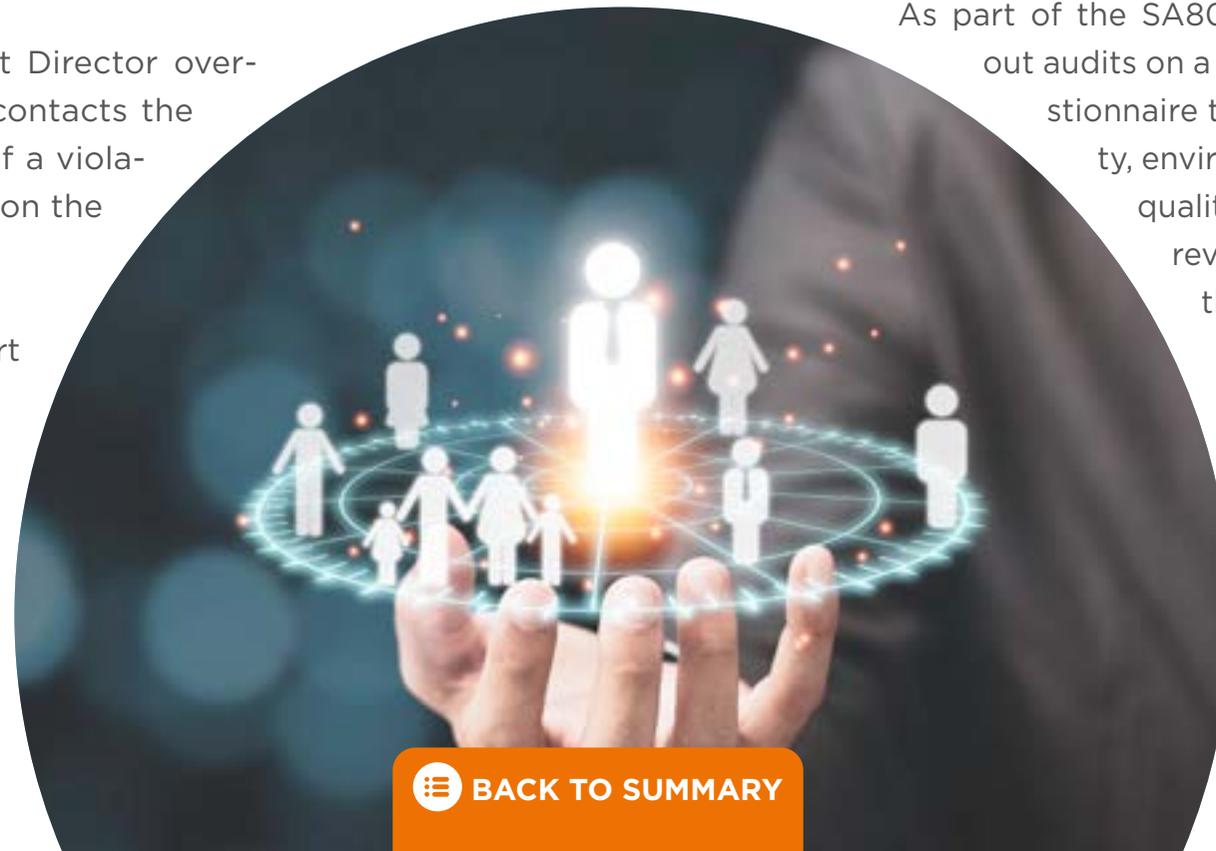
GRI 102-9 GRI 102-10 GRI 102-11 GRI 308-1 GRI 414-1

WINDTRE is aware of the fact that it can only achieve its positive impact with everyone's contribution, including its suppliers. For this reason, the company has established an in-depth analysis system for the suppliers with which it collaborates. During the selection and qualification phase, **the suppliers are subjected to assessment by the company's integrated management system, which evaluates their ability to meet the necessary quality, environment, health and ethical requirements**. Particular attention is paid to any suppliers whose activities can have a potentially high environmental impact. The supply chain operators with which WINDTRE collaborates are often large international companies that provide infrastructure, equipment, network services, and software. **In 2021, WINDTRE had 631 qualified suppliers³¹.**

As part of the SA8000 Management System, WINDTRE has carried out audits on a sample of suppliers, administering an ad hoc questionnaire to analyse the following issues: social responsibility, environmental policies, occupational health and safety, quality, and information security. This analysis did not reveal any significant discrepancies with respect to the SA8000 Standard.

The activity was an opportunity to raise the suppliers' awareness of issues functional to effective compliance with the standard, such as the dissemination of the Disciplinary Code and the adoption of the Code of Ethics.

³¹ 100% of new suppliers has been evaluated using environmental and social criteria



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REPORTING POSSIBLE VIOLATIONS
a plurality of communication channels aimed at employees and third parties enable the reporting of actual or potential misconduct, even in anonymous form

Attention to sustainability by all the players in the supply chain is accelerating at an unprecedented. Large customers and partners are also increasingly requesting more information about WINDTRE's initiatives, commitments, and results achieved in the various aspects of sustainability.

Suppliers [GRI 102-9]	2021	2020	2019	2018	2017
Qualified suppliers (no.)	631	891	736	410	474
Qualified suppliers located in Italy (no.)	592	827	660	365	442
Active suppliers (no.)	631	891	736	410	474
Amount ordered (in millions of €)	2,187	1,830	2,174	1,987	1,795

Disputes with suppliers (no.)	2021	2020	2019	2018	2017
Number of disputes with suppliers	3	4	5	5	6



2021

WINDTRE obtained the three-year renewal of its Information Security, Environmental and Quality certification

TOTAL QUALITY MANAGEMENT

WINDTRE has adopted an **Integrated Management System** that involves all the company departments in guaranteeing and documenting the **quality and correctness of the processes**, with the aim of guiding and monitoring performance by applying the continuous improvement principle typical of Total Quality Management.

WINDTRE's Integrated System consists of six certifications:



The Quality, Environment, Worker Health and Safety and Social Responsibility certifications cover all the WINDTRE office locations³², while the Information Security certifications only cover the Data Centres where the specific services are provided.

In 2021, WINDTRE obtained the **three-year renewal of its Information Security certification** (ISO 27001 - Provision of Security Management and Security Operations Centre services), **Environmental** certification (ISO 14001) and **Quality** certification (ISO 9001).

Wind Tre S.p.A. is also part of the EcoVadis network, a worldwide provider of Business Sustainability assessments. In 2021, the Company increased its rating compared to the previous year by 26.8%, with an overall score of 52/100

For 2022, the company has set itself the goal of **obtaining the certifications for Energy** (ISO 50001), **Greenhouse gases** (ISO 14064) and **Business Continuity** (ISO 22301, for the Cloud service Data Centres), with the creation of dedicated interdepartmental project teams.

³² All the Quality Management System certifications, concern only and exclusively Wind Tre S.p.A. company



CLOUD SERVICES

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



SECURITY OPERATION CENTER

provision of Security Management services and management of the Security Operations Centre

CLOSER TO OUR CUSTOMERS



- What it means to us
- Why it's important
- Communication channels
- Customer satisfaction
- The pursuit of shared solutions
- Dialogue with Consumer Associations
- Open proceedings

WHAT IT MEANS TO US



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



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



Offering **customers, a unique experience** through multiple contact channels



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

WHY IT'S IMPORTANT

Communication tools are constantly evolving, and telecommunication service providers must be the first to know how to communicate with their customers and meet their needs and expectations. TELCO companies not only undertake to offer the tools necessary for telecommunications, but also to provide customers with helpful support services. The ability to communicate is inherent in the ability to satisfy the customer, who is no longer merely looking for a functional product, but also wants **a memorable and customer-centric shopping and service experience.**

The integration of Customer Retention Management (CRM) within all the company's departments is a fundamental step to meeting the customers' demands. While 50% of Italian companies believe that improving customer loyalty and satisfaction is one of the main business priorities, to date just 20% have completely integrated CRM with their marketing tools³³.

The advent of 5G will have a major impact in terms of customer experience, allowing companies to provide increasingly demanding customers with more efficient communication speeds and improved responsiveness. In fact, 32% of consumers say they're ready to leave a company after just one negative customer service experience, while 63% say they're willing to spend up to 16% more on products and services, to be more loyal, and to share more information with the company if their experience is satisfactory³⁴. The development of Artificial Intelligence will also play an important role in the evolution of the customer experience. This technology will further the expansion of content marketing tools, from data analysis to data generation, and will revolutionise the field of advertising by optimising campaigns in terms of time, costs, and means to be utilised. An **average annual growth of 31% in spending on customer-centric AI solutions and tools is expected to take place** from 2019 to 2023³⁵.

³³ IDC: *Redesigning customer service to meet the customers' new expectations, 2020*

³⁴ PWC: *Experience is everything: Here's how to get it right, 2021*

³⁵ *Ibid.*



31%

Average annual growth in spending on customer-centric AI solutions and tools



70%

The percentage of consumers who believe that a fast, friendly, and convenient support service is essential

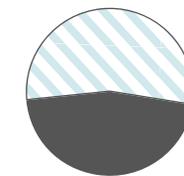
(PwC, 2021)



8th

The telecommunications sector's ranking in Italy's classification of Customer Experience Excellence

(KMPG, 2020)



46%

The percentage of people who see technology as a fundamental tool for interacting with companies

(Infobip, 2021)

COMMUNICATION CHANNELS



90%

The proportion of customers who did not have the need to re-contact customer service in the following days after using the Asynchronous Chat

Today, customers have numerous ways of getting in touch with companies, and have become increasingly demanding, expecting customer service that will promptly meet their needs and resolve their problems. The quality of a telecommunications service isn't just limited to the purchasing phase, but depends on the dialogue that is able to be established with the customer throughout each stage of the relationship: prior to a purchase, during the finalisation of the business agreement, while the supply relationship is in progress, when any problems arise or the communication needs and habits change, and all the way up to the conclusion of the contractual relationship.

The **main goal of WINDTRE's Customer Care is to offer the customer an experience that's as simple and uniform as possible**, based on the information requested and the assistance received, through the various contact channels. In pursuit of these objective, in 2021 WINDTRE continued launching information campaigns and deployment activities conveyed through Artificial Intelligence, focusing not only on the technical tools and the accuracy of the information, but also on the Customer Experience provided through the Artificial Intelligence. A study of the texts utilised was conducted, with the aim of increasing the customer's comprehension, their confidence in the use of non-human channels of communication, and, last but not least, reducing the number of requests to speak with a human operator.

2021 also saw the continuation of the **Asynchronous Chat** service, in which the conversation can take place in multiple sessions, at the pace preferred by the customer. The service was launched in 2020 to replace the social network channels, and maintained the same positive trend as the previous year: in fact, during the days after using the asynchronous chat, 90% of customers had no need to contact customer service. With the launch of the WINDTRE brand, the customer contact numbers were merged

into a single number (159). There are 21 WINDTRE contact centres for Consumer customers, and 7 centres for Business customers.

VeryMobile, another brand belonging to CK Hutchison Holdings Ltd. group, to which WINDTRE also belongs, also has a dedicated customer service number (1929). The company keeps the quality of the customer communication services under constant control by **regularly monitoring certain key indicators, such as the perceived quality** of the Customer Care service. The quality of the Customer Care service is essential to the company's marketing and sales strategies: in fact, the proper management of the same allows the company to maintain the loyalty of its customers and the good relations that it has instilled with them, and consequently fosters the company's growth and development. With this in mind, therefore, WINDTRE has chosen to dedicate the utmost attention to its customer relations. The main goal of WINDTRE's Customer Care management is to offer customers a positive and seamless experience in terms of the information and support provided through the various channels of contact, and according to a holistic approach, in order to ensure that the customers feel that they are being heard, and receive support in a fast, efficient, and kind manner.



CONTACT CENTERS

There are 21 WINDTRE contact centres for Consumer customers, and 7 centres for Business customers

Servizio di assistenza al cliente		2021	2020	2019	2018	2017
Contact by telephone (no.)	Business	1,290,131	1,351,045	1,531,256	1,829,907	
	Consumer	17,286,278	20,863,116	26,925,442	36,424,497	
	Total	18,576,409	22,214,161	28,456,698	38,254,404	42,547,219
Support requests received by the specialised technical assistance groups (no.)	Business	311,625	313,891	348,053	348,487	
	Consumer	2,647,223	3,022,218	3,452,840	4,377,023	
	Total	2,958,848	3,336,109	3,800,893	4,725,510	4,677,820

CUSTOMER SATISFACTION

Once again in 2021, WINDTRE measured **customer satisfaction** on a scale of 10 to 100 through market-specific (fixed, mobile, consumer and business) telephone interviews carried out by an independent external company on a representative sample of customers. The survey was conducted on a quarterly basis with 1,400 interviews of Mobile Consumers, the more representative market segment in terms of customers and revenues, being conducted on a representative sample, based on geographic area, type of contract (pre-paid or post-paid), nationality, data usage mode, and contract duration. The overall results showed a **customer loyalty of 86.2 for WINDTRE³⁶ customers** and 90.3 for Very Mobile³⁷ customers, with an **overall satisfaction of 81.0 for WINDTRE** and 85.9 for Very Mobile.

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



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

³⁶ WINDTRE includes Wind, TRE and WINDTRE

³⁷ Monitored from 4Q20



LOYALTY AND SATISFACTION

81, on a scale of 10-100, the overall customers satisfaction of WINDTRE's customers. 86.2 the Loyalty

THE PURSUIT OF SHARED SOLUTIONS

In the event of a customer dispute, WINDTRE uses two mediation tools to reduce recourse to the courts: **attempted mediation**, provided by the Communications Authority (AGCOM), with the support of a third party (Co.re.com. - Comitati regionali per le comunicazioni) and the **Alternative Dispute Resolution procedure** carried out by consumer associations registered with the Consiglio Nazionale dei Consumatori e degli Utenti (CNCU). The mediation is managed online with a dedicated website. Both cases have shown positive trends in resolving disputes.

Mediation proceedings/Disputes handled before Corecom/AGCom	2021	2020	2019	2018	
Mediation requests submitted to the Co.re.coms ³⁸ (during the reference year)	16,980	23,035	26,408	28,098	
Solution agreed between the parties (% volumes managed during the reference year)	80%	81%	80%	79%	
User request for the Authority or the Co.Re.Coms to resolve the dispute parties (% volumes handled during the reference year)	n. %	2,103 12%	2,552 11%	3,027 11%	2,175 8%
User request for the Authority or the Co.Re.Coms to adopt an urgent measure (during the reference year)	n. %	2,431 14%	2,752 12%	2,828 11%	2,481 9%
Total	21,514	28,339	32,263	32,754	

Consumer Association Complaints and Joint mediation requests	2021	2020	2019	2018	2017	
Complaints from Consumer Associations (no.)	5,178	6,070	7,032	7,056	8,000	
Joint mediation requests (no.)	3,125	3,667	4,204	3,764	3,825	
Claims managed (no.)	3,115	3,671	4,011	3,723	3,357	
Claims with a positive outcome	no. %	2,928 94%	3,465 94%	3,751 94%	3,482 94%	3,180 95%

Litigation with customers	2021	2020	2019	2018	2017
Pending as of 31/12	13,530	13,339	13,206	12,131	9,069
Favourable outcomes (%)	75%	72%	68%	66%	65%

³⁸ The complaint through association is a condition of admissibility for the presentation of the request for Joint conciliation

DIALOGUE WITH CONSUMER ASSOCIATIONS

In order to keep constantly up-to-date on its customers' new needs and expectations, WINDTRE has established an open and proactive dialogue with the major Consumer Associations active throughout the country and recognised by the CNCU. This systematic dialogue allows us to gather ideas and proposals, in order to build increasingly attentive and perceptive relationships with customers and consumers. With these intentions, in 2021 the company signed an important **annual cooperation protocol with the major Consumer Associations** in order to promote initiatives that will further the common goal of ensuring **responsible use of digital technologies**. In collaboration with Adiconsum, Adoc, Altroconsumo, Cittadinanzattiva, Federconsumatori, and U.Di.Con. After the protocol was signed, the **Welcome to WINDTRE** programme was

launched, which entailed meetings and sessions dedicated to specific areas of collaboration, including sustainability. In-depth analyses on the development of telecommunication infrastructures and technologies and dialogues on transparency in consumer relations are expected to be carried out in 2022. The agreement is open to other associations as well, and can be extended prior to its expiration date.



COOPERATION PROTOCOL

Signed with the major Consumer Associations in order to promote initiatives that will further the common goal of ensuring responsible use of digital technologies

THE CURRENT PROCEEDINGS

28 DAYS

With resolution no. 121/17/CONS of 15 March 2017, AGCOM established the obligation for fixed and convergent customers to switch to monthly charges and renewals every 30 days, as opposed to the 28 day interval applied by all Telco operators at the time.

Within this context, AGCOM asked the operators to reimburse all their customers for the difference between the 28-day and the monthly billing cycle for the period of time that elapsed between the order issued with the resolution and the actual application of the monthly billing cycle.

With a non-definitive ruling issued on 23 September 2020, the CDS referred some of the reasons for the aforementioned resolution's unlawfulness, regarding the lack of power of AGCOM, as claimed in the appeals filed by WINDTRE and the other operators, to the Court of Justice of the European Union. The appeal to the Supreme Court and the appeal for the revocation of the ruling issued by the CDS on 24 February 2020, which confirmed the legitimacy of the other AGCOM resolutions on the topic of reimbursement, also moved forward.

In February of 2020, AGCOM sanctioned WINDTRE, as well as other operators, for not having reimbursed the parties concerned by postponing billing for an equivalent number of days consumed. After being served with sanction no. 78/20/CONS, for which an appeal is pending before the Regional Administrative Court, no additional injunctions and/or proceedings were received from AGCOM.

This resolution was challenged before the Lazio Regional Administrative Court on 2 July 2020.

The individual requests for reimbursement must be handled with Corecom and the competent Courts. A number of consumer associations have filed a civil action suit on behalf of their members in order to obtain the reimbursements. WINDTRE has made available a list offering the concerned customers a range of reimbursement options to choose from, including the reimbursement itself.

In July of 2021, the Law Courts of Milan found the 28 days billing cycle unlawful and ordered the decision to be published in two national journals. The reimbursement of the relative amounts to the customers who request them (as of June 2016) has been ordered. The court also ordered letters to be sent to former customers who deactivated their service between June 2016 and April 2018.

These measures were suspended following the acceptance of the preemptive injunction submitted by WINDTRE.

VALUE ADDED SERVICES

Faced with the evidence of unwanted Value Added Service activations, with particular regard to the M2M activation phenomena that occurred in 2019, WINDTRE took several remedial actions to counteract the unlawful phenomenon of non-compliant activations, to the point that, in July of 2020, it proposed to AGCOM the *default barring* of its entire customer base (with the exception of Carrier Billing services, the activation of which already entail certain security requirements), but did not receive any feedback in this regard.

On 21 August 2020, with resolution 401/20/CONS, AGCOM launched a public consultation, proposing the exact same remedies suggested by WINDTRE (including *default barring*) to the market.

On 31 July 2020, AGCOM notified WINDTRE of the initiation of sanction proceeding 13/20/DTC contesting the activation of Value-Added Services considered to be non-compliant on M2M and P2P SIMs.

During the sanction proceeding, WINDTRE defended itself by explaining to AGCOM all the actions it had already taken to stop the unwanted activations, including *default barring* since 18 October 2020, and also reminded the Authority of its proposal to immediately block the Value-Added Services as a definitive resolution to the phenomenon.

Within the context of the sanction proceeding, WINDTRE also presented a comprehensive proposal of commitments concerning:

1. the *barring* of the entire *Customer Base* as of 18 January 2021, with notification to customers via SMS and publication in national newspapers
2. the activation of Value-Added Services, for those who request them, via One-Time Password (OTP) authorisation
3. full reimbursement for customers who submit claims and holders of SIM cards in IoT devices, tracked in an innovative manner
4. the provision of a toll-free number to contact for customer support on this specific topic
5. the creation of an operational control *Task Force*, which will provide a periodic progress report on the ongoing activities to an Oversight Committee chaired by AGCOM.

With regard to the *barring* of the *Customer Base*, AGCOM cautioned WINDTRE against proceeding on 18 January 2021 as foreseen, ordering it to wait for the regulatory resolution following the consultation procedure, which was later published on 5 February 2021 (resolution no. 10/21/CONS).

AGCOM resolution 10/21/CONS confirmed the obligation for generalised *barring* and for activation with OTP authorisation for the entire market, also including, however, the activation of subscription *carrier billing* services. The resolution did not cover, on the other hand, all one-shot Value-Added Service activations (including *Carrier Billing*).

WINDTRE applied the *default barring* to the *Customer Base* on 18 April 2021, prior to the 5 June 2021 deadline established by the resolution.

During the continuation of the proceedings, WINDTRE engaged in a great deal of correspondence with AGCOM, progressively expanding the scope of its commitments to meet the Authority's increasing demands, to the point that it had to stop when faced with AGCOM's latest request, which would require WINDTRE to also impose *barring* and OTP authorisation to *Carrier Billing* subscription services as well.

WINDTRE explained to AGCOM that it is unable to satisfy this request, because the activation mechanics for the *Carrier Billing* services are exclusively available to the OTTs, and WINDTRE cannot distinguish between subscription and *one-shot* activations on its systems. Despite this, on 7 May 2021, AGCOM rejected WINDTRE's commitments based exclusively on its presumed inability to provide *barring* for *one-shot* *Carrier Billing* services (although not covered by AGCOM resolution 10/21/CONS and not disputed by proceeding 13/20/DTC). On 24 June 2021, at the conclusion of proceeding 13/20/DTC, AGCOM imposed a fine of € 812,000.00 on WINDTRE with resolution 191/21/CONS.

WINDTRE filed an appeal with the Regional Administrative Court (on 23 September 2021), which is still pending.

On 3 November 2021, AGCOM provided service of process for the start of sanction proceeding 12/21/DTC.

With regard to the *Premium* services covered by Resolution 10/21/CONS, AGCOM deemed that WINDTRE did not fulfil its obligation (both for new SIMs and those already available to the customer) to implement *barring* and activation via OTP authorisation for “*Carrier Billing*” subscription services, and did not inform its customers about the exclusion of these services from the *barring* on the dedicated *web* pages (containing information about the blocking and activation of premium subscription services).

In its defence, WINDTRE clarified that it is unable to distinguish between subscription services and *one-shot* services, since this distinction is only available to the OTTs, and WINDTRE sees all the services on its own systems as if they were to be *one-shot* services. Some OTTs are already collaborating and, in relation to the *Carrier Billing* services they offer, have now begun only offering *one-shot* services: consequently, WINDTRE is able to confirm, exclusively for these OTTs, that it does not offer subscription *Carrier Billing* services. The same operators have confirmed their willingness to confirm the subscription services offered should they be introduced in the future.

The potential sanction envisaged for the proceeding in progress ranges from € 58,000.00 to € 1,160,000.00.

WINDTRE was heard in a specific hearing on 10 December 2021. The proceeding is still in progress.

It’s important to highlight that AGCOM is currently re-evaluating its position regarding *Carrier Billing* subscription services, even with regard to the need for them to be governed by resolution 10/21/CONS.

This revaluation is in large part due to the weight of WINDTRE’s defence, which has shown that it is not responsible for the failure to comply with the aforementioned resolution, and the evidence presented showing that *Carrier Billing* activations are subject to even more stringent security measures than those governed by this resolution.

Clarity and transparency in commercial communications

Non-compliance disputes relating to marketing communications [GRI 417-3]	2021	2020	2019	2018	2017
Non-compliance disputes resulting in fines or penalties (no.)	0	0	0	1	0
Non-compliance disputes resulting in reprimands (no.)	1	2	1	0	0
Non-compliance disputes resulting in voluntary commitments (no.)	1	2	1	1	3



MORE HUMANITY

INCLUSION

- Digital divide
- Gender equality
- Inclusion of people with disabilities
- Closer to the community

LIFELONG DIGITAL LEARNING

CLOSER TO OUR PEOPLE

DIGITAL DIVIDE

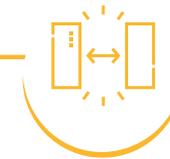


- What it means to us
- Why it's important
- Our goals
- NeoConnessi Silver: helping seniors become familiar with technology
- Mai più soli (Never alone again)
- Support for the Gemelli Polyclinic with the Art4ART project
- Closer to your loved ones
- Support for local administrations during the digital transition
- On Air

WHAT IT MEANS TO US



Offering **concrete support to the more vulnerable segments of the population**



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



Implementing the corporate "purpose" of **eliminating distances between people**



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



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



WHY IT'S IMPORTANT

The digital divide is the **gap that exists between certain segments of the population in terms of access to new technologies** (particularly the Internet), mainly due to territorial, economic, cultural, personal, and technological factors. The onset of the pandemic and the use of digital tools for educational and work purposes shone a spotlight on this phenomenon in Italy like never before.

Today, 4.3 million Italians³⁹ and 1 in 3 households either do not have or do not have access to an Internet connection⁴⁰, above all in the South.

The latest data from the regional Digital Economy and Society Index for 2019 show a level of digital performance ranging from 72/100 for Lombardy to 18.8/100 for Calabria, which is last in the ranking. All the regions of the South ranked below the Italian average (equal to 54/100)⁴¹.

Reducing and ultimately overcoming the digital divide means continuously **striving to bring digital technologies everywhere**, and ensuring the creation of an inclusive, accessible, and affordable network for the benefit of those segments of the population that have been marginalised for socio-demographic or economic reasons. This is the focus of the Digital Republic, the national strategic initiative aimed at combating the digital cultural divide, fostering maximum digital inclusion, and promoting education on the technologies of the future⁴².

The National Recovery and Resilience Plan also represents an important opportunity to support the enormous investments needed not only to expand and improve the networks, but also to allow for the high-quality use of innovative services at low costs.

³⁹ Censis, *Il Valore Della Connettività Nell'Italia Del Dopo Covid-19*, 2021
⁴⁰ Istat, *Rapporto Bes 2020: Il benessere equo e sostenibile in Italia*, 2021
⁴¹ Osservatorio Agenda Digitale, *Polytechnic University of Milan*, 2021
⁴² MITD: *Digital Republic*, 2021



4.3 MILLION

The Italians who do not have access to an Internet connection (1 out of 3 households)



57.4%

The percentage of connections in Italy at speeds greater than 100 Mbit/s

(AGCOM, 2021)



33.3%

The percentage of Italian families who did not have an Internet connection or a computer at home in 2020

(Istat, 2021)



1 Gbit/s

The nationwide coverage target for 2026 set by the Italian strategy for ultra-broadband

(MITD, 2021)

Operators in the telecommunications sector play a primary role in bridging the country's digital divide and in planning the next public interventions on the digital infrastructures. The Government has entrusted Infratel Italia (a company engaged in nationwide infrastructure projects aimed at overcoming the digital divide and disseminating advanced connectivity services) with the task of mapping of the country's fixed and mobile networks between now and 2026. Partnerships with public and private entities in the telecommunications sector will allow for the identification of areas that are still behind in terms of connectivity, and the promotion of their digitisation.



INFRATEL ITALIA

The company entrusted by the government with infrastructure projects in Italy to overcome the digital divide



OUR GOALS



SENIORS 100% CONNECTED - BY 2025



TOMMASO VITALI

Sustainability Ambassador

Head of B2C Marketing & New Business

“We want to actively contribute to the digital inclusion of older people by putting our purpose into practice”

COURSES OF ACTION

Creation of a new tool linked to the NeoConnessi project to involve the children's grandparents in the digitisation process

Development of digital education tools to disseminate digital awareness through new tutorials and the creation of online communities

Launch of partnerships with local authorities and consumer associations to reach the target and leverage their reliability

WHERE WE ARE AT

Launch of the **NeoConnessi Silver** platform

Creation of a Facebook Group dedicated to Seniors in order to create a community and share experiences

OUR GOALS

CONNECTED VILLAGES - BY 2025



ALBERTO PIETROMARCHI

Sustainability Ambassador

Head of Wholesale

“We want to accompany the growth of small Italian villages thanks to connectivity and smart technologies”

COURSES OF ACTION

Improvement of mobile network coverage and elimination of FTTH (Fibre To The Home) gaps with FWA (Fixed Wireless Access)

Development of **education** programmes targeting the Public Administration, businesses, and citizens

Development of **connectivity services for communities**, such as Wi-Fi coverage in public areas

Attendance of **events** and funding of **local initiatives** intended to benefit communities

WHERE WE ARE AT

Launch of digital transition initiatives to support Local Administrations

Assistance with the organisation of events focused on the digital divide and innovation

Ascoli Piceno: support for the Administration in promoting the “culture moves the Mountains” initiative

Doubling of the availability of ultra-broadband connectivity by OnAir through FWA technology, even in the most remote areas

Attendance of the 38th Annual Assembly of the ANCI

NEOCONNESSI SILVER: HELPING SENIORS BECOME FAMILIAR WITH TECHNOLOGY

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

In order to help seniors familiarise themselves with technology, WINDTRE has decided to expand the NeoConnessi project with **a new section of the portal dedicated to people Over 60: NeoConnessi Silver**, which contains articles and insights designed to help seniors learn how to safely take advantage of everything the Internet has to offer. There are also various **video tutorials** featuring an expert teacher, who explains the basics of using a smartphone, and even discusses specific topics, like using apps and creating a digital identity, all using simple and easy-to-understand language.

There’s even a dedicated Facebook group called **NeoConnessi Silver - Grandparents and Over60s on the Internet**, where seniors can exchange advice and ideas, and engage in discussion on digital topics.

This programme crates an intergenerational bond between grandparents and their grandchildren, and even allows this extraordinary value to be increased in terms of welfare.



MAI PIÙ SOLI (NEVER ALONE AGAIN)

The pandemic proved to be particularly difficult for elderly people who live alone. In order **to provide assistance and psychological support during this prolonged period of isolation**, WINDTRE remained close by those who were most vulnerable, providing them with a **toll-free number**.

The initiative, which was launched in 2020 by Senior Italia FederAnziani and WINDTRE, and remained active during the first few months of 2021 as well, involved the vast nationwide network of professionals from the Italian Society of Emergency Psychology (SIPeM SoS).

These operators made themselves available to answer the calls of all those in need of a friendly voice and psychological support to help them through this period of isolation.

Thanks to this initiative, WINDTRE was able to provide concrete support to those who would otherwise have been left on their own, aggravating the risks to their mental health during what was already difficult period to face in terms of physical health. The company had the opportunity to put its values of closeness and convenient technology into practice.

WINDTRE has launched another partnership with AnyTech365 in order to offer its Over-60 customers access to dedicated telephone support for setting up their smartphones. Video tutorials are also available on the WINDTRE website to help seniors perform daily activities, like sending WhatsApp messages, making video calls, and ordering groceries online.

SUPPORT FOR THE GEMELLI POLYCLINIC WITH THE ART4ART PROJECT

WINDTRE is supporting the Agostino Gemelli University Hospital in Rome with the **Art4ART** project (an acronym that stands for Art for Advanced Radiotherapy), the main goal of which is to support patients and their caregivers during the treatment processes by rendering the environments more pleasant, welcoming, and stimulating, with art and technology. In particular, the company donated **connectivity enabled devices to be made available to cancer patients, in order to provide them with a personalised multimedia experience during their treatments**, with digital audio and video content.



According to **Prof. Vincenzo Valentini**, Director of the Department of Diagnostic Imaging, Oncological Radiotherapy and Haematology, “Art4ART was created to offer our patients an excellent example of the humanisation of highly technological treatments, by flanking the most advanced radiotherapy treatments with the beauty of art, because we’ve wanted to offer our patients an art that’s capable of healing them ever since this treatment pathway arose.”



 [BACK TO SUMMARY](#)



A FRIENDLY VOICE

The initiative, created during the Covid-19 pandemic, has enabled lonely people to get a friendly voice and psychological support

CLOSER TO YOUR LOVED ONES

During 2021, WINDTRE remained close to the more vulnerable segments of the population thanks to the **Closer to Your Loved Ones** initiative, the goal of which was **to help people over 60 become more familiar with the digital world**.

For this purpose, in collaboration with Senior Italia FederAnziani, several video tutorials were made available to the general public on the WINDTRE YouTube channel, which explain how to use the most common digital tools to stay in touch with loved ones, and how to simplify a number of daily activities, all in a simple and intuitive manner. These videos aim to simplify certain ordinary activities, and include tutorials on how to book medical services, how to use messaging and delivery apps, and how to use e-mail.

SUPPORT FOR LOCAL ADMINISTRATIONS DURING THE DIGITAL TRANSITION

WINDTRE continues to work **hand-in-hand with local governments** and their representatives to extend, strengthen and modernise digital infrastructures, as well as to enable the dissemination of new technologies. This partnership is also intended to help bridge the territorial gaps that still exist today in terms of Internet access, and aims not only to guarantee **more uniform access to the Internet**, but is primarily focused on building a solid digital base for 4.0 technologies, such as those based on IoT devices, and ensuring the enjoyment in the benefits they entail.

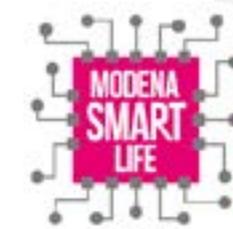
Various initiatives have been launched in **support of local Administrations** to promote the use of **technologies at the service of citizens** and the territory, in order to sti-

mulate an increasingly broad and inclusive digital culture. In 2021, WINDTRE supported local Administrations as an institutional sponsor for several major events: Modena Smart Life, the Earth Technology Expo, and the 38th Annual Assembly of the ANCI.

During the **Modena Smart Life** digital culture festival, WINDTRE supported the Municipality of Modena and the Collegio San Carlo Giuliano Albarani Foundation in studying the links between the various forms that digital technologies can assume in people's lives, with a particular focus on the topics of digital, ecological, and social "Environments", examining the convergence between the physical and digital realms.

The second initiative was the **Earth Technology Expo**, in Florence. This was the first and most comprehensive exhibition of current technological applications and innovation envisaged by the Next Generation EU guidelines. In fact, the goal was to stimulate the responsible use of technologies as a tool for a more mature digital and ecological transition, in order to promote protection against major natural risks, for good land management, and for a more reliable modelling of the effects of climate change.

The last event was the **38th Annual Assembly of the ANCI** (the National Association of Italian Municipalities), held in Parma. Thanks to its partnership with AnciComunicare, WINDTRE had the opportunity to share its perspectives on the digital divide in Italy, and several ideas to help bridge it. With regard to the smaller municipalities and interior areas of Central Italy, which are among the least connected parts of the country, WINDTRE described the projects that it had launched to achieve two of the ESG plan's key goals: Connected villages Smart Partners of 100 Smart Cities.



MORE UNIFORM INTERNET

WINDTRE works alongside Local Governments to ensure more uniform Internet access



INSTITUTIONAL SPONSORSHIPS

- Modena Smart Life
- Earth Technology Expo
- Annual Assembly of the ANCI

In addition to partnerships with local Public Administrations like those described, initiatives have also been launched to support the Municipalities' participation in the Ministry of Economic Development's tender: Homes of emerging technologies.

With this tender, the Ministry of Economic Development is funding the creation of technology transfer centres throughout the country aimed at supporting research and experimentation projects for SMEs and start-ups that involve the use of Blockchain, IoT and artificial intelligence technologies linked to the development of next generation 5G networks.

In 2021 WINDTRE signed an agreement with the Capitoline Administration, in which the company's efforts are focused on projects aimed at promoting tourism and mobility using the most innovative technologies. WINDTRE supports the CTE Sicura Project in L'Aquila, and the Prisma project in Prato, with the projects' efforts being applied to the textiles/fashion and Made-in-Italy sectors.

The company's institutional attention to the dialogue and engagement with the local administrations has also led to considerable involvement on the part of the CEO, who, in 2021, held meetings with the Municipalities highest ranking officers in order to better understanding the needs and difficulties associated with their technological and digital development. WINDTRE intends to support projects capable of exploiting the potential of 5G technology to generate services aimed at improving the lives of citizens.

For this reason, in 2021 WINDTRE supported the city of Ascoli Piceno's candidacy for the title of Italian capital of culture (also digital) for 2024.

Finally, WINDTRE was a partner of the "5G Italy" event, now in its fourth edition, in which politicians, regulatory authorities, researcher, business figures, economists, and public administrators all come together to discuss the challenges and opportunities of 5G. The conference was dedicated to a technology that will provide the connectivity and services needed for Italy's digital transformation, and addressed several topics related to 5G, such the potential positive impacts in every sector, including agriculture, business, defence, energy, finance, industry, media, public administration, health, safety, transport, and tourism.

ON AIR

On Air is the WINDTRE solution **for companies** that reduces the digital divide **by doubling the availability of ultra-broadband connectivity through FWA (Fixed Wireless Access) technology**, even remote areas not yet covered by fibre. On

Air aims to enable digital transformation and support the most advanced industrial applications, including through the diversification of access, a fundamental condition to ensure B2B services.

This new solution is provided by WINDTRE BUSINESS thanks to an agreement with the Wholesale division of **EOLO**, the main operator in Italy in the Fixed Wireless Access ultra-broadband for business and residential segments. Subscribing to the On Air solution allows companies to connect their various offices to WINDTRE's Top Quality network with the licensed frequency radio links provided by EOLO, which feature excellent reliability, innovation and network coverage.



REDUCE DIGITAL DIVIDE

On Air is the WINDTRE solution for companies that doubles the availability of ultra-broadband connectivity through FWA (Fixed Wireless Access) technology

GENDER EQUALITY



WINDTRE OBTAINS THE **EQUAL SALARY** CERTIFICATION



THIS IS ALSO WHY CAMILLA IS HAPPY TO WORK IN WINDTRE

Camilla Caso
B2C Marketing Product Owner

- What it means to us
- Why it's important
- Our goals
- Focus on Diversity & Inclusion
- Awards obtained
- The #VocealleGamer Campaign
- #DimmiCheSostienilPride

WHAT IT MEANS TO US



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



Promoting and maintaining an **open and inclusive culture**



Promote **female leadership**

WHY IT'S IMPORTANT



In a world that's still struggling to recognise gender equality globally, the advent of the Covid-19 pandemic further increased the gender employment gap, with what has been referred to as the called **she-cession**⁴³.

Out of the 444 thousand jobs lost in Italy during 2020, a whopping 72.9% were held by women⁴⁴. This is well reflected in the employment rate at the end of 2021, which showed that only 49.5% of women were employed, compared to 67.8% of men⁴⁵, and there does not appear to be a recovery on the horizon. According to the World Labour Organisation, **13 million fewer women are expected to be employed** in 2022, while the male employment figures are expected to return to 2019 levels⁴⁶.

The criticality of this scenario is also due to certain cultural aspects of our society: even before the Covid-19 pandemic, **7.7 million women** in Europe were out of the labour market due to their commitments to care for their children or elderly/disabled relatives⁴⁷, and this is not surprising if we consider that, to this day, **44% of Europeans** believe a woman's primary job is to be a homemaker and look after her children⁴⁸.

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

⁴³ European Parliament: *An ambitious future for Europe's women after COVID-19: mental load, gender equality in teleworking and unpaid care work after the pandemic, 2022.*

⁴⁴ Ibid.

⁴⁵ Istat: *Occupati e Disoccupati, October 2021*

⁴⁶ ILO: *World Employment and Social Outlook, Trends 2022, 2022*

⁴⁷ EIGE: *Gender inequalities in care and pay in the European Union, 2020.*

⁴⁸ Commissione Europea: *2021 report on gender equality in the EU, 2021*



136

The number of years needed to close the global gender gap

(World Economic Forum, 2021)



39%

The percentage of women present on the Boards of Directors of Italian companies listed on the stock exchange, 6% greater than in Germany

(The European House-Ambrosetti, 2021)



€ 7 billion

The resources mobilised by Italy in support of gender equality through the National Recovery and Resilience Plan

(PNRR, 2021)





68%

The share of enterprises that don't have a role for promoting the inclusion of women

In fact, according to 3 out of 4 managers, a proper **gender balance among the company's senior management ensures better company performance**⁴⁹. However, there are still too few companies that have adopted an organised structure aimed at reducing gender inequality: 68% don't have a structure that fosters the inclusion of women, and just 21% expect to adopt one in the medium term⁵⁰.

Ensuring gender equality and respect for diversity is a fundamental asset: companies with a percentage of female managers greater than 30% are more likely to outperform companies with a percentage of senior female figures ranging from 10% to 30%, and in 2019 a 36% increase in performance was recorded among companies with the greatest cultural diversity⁵¹.

Furthermore, over 50% of managers are unaware of the measures recently introduced by the National Recovery and Resilience Plan, wherein Mission 5, entitled "Inclusion and Cohesion" calls for the establishment of a **national gender equality certification system** that will incentivise companies to introduce policies aimed at reducing the current gender gap.

The certification, which can be obtained starting in 2022, allows companies to obtain tax breaks of up to € 50,000.

⁴⁹ EY: Goal 5: survey on gender equality within Italian companies, 2022

⁵⁰ Ibidem

⁵¹ McKinsey & Company: Diversity wins: How inclusion matters, 2020

OUR GOALS

GENDER EQUALITY - BY 2025



SERGIO GONELLA

Sustainability Ambassador

Head of Culture, Development, Inclusion & Talent Acquisition



MANUELA GIUSTI

Sustainability Ambassador

Head of Hr Management & Compensation

"We want to ensure gender equality from hiring to the entire career within the company, in promotions or role changes, by nurturing an open and inclusive culture"

COURSES OF ACTION

Implementation of **specific development pathways** for women

Guarantee of gender equality in the promotion and career development processes, and in all remuneration policies

Involvement of the employees in the **collection of feedback regarding their needs**

Promotion of practices and policies aimed at **supporting a culture of equality**

WHERE WE ARE AT

Increase in the percentage of **female managers**, which currently stands at 28%

Appointment of a **Diversity & Inclusion Manager**

First Telco company in the world to obtain **Equal Salary certification**

Leader in Diversity 2022 according to Statista and the Financial Times

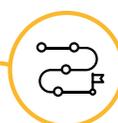
Promotion of the following campaigns: **#VocealleGamer:** the fight against discrimination even includes video games. and **#DimmiCheSostienilPride**



FOCUS ON DIVERSITY & INCLUSION

The introduction of a **Diversity & Inclusion Manager**, a figure tasked with guiding the company towards achievement of its gender equality and social inclusion goals, has certainly been an another excellent step towards which prove the company's commitment to eliminate the gender gap.

This figure's responsibilities include:



defining the Diversity & Inclusion **strategy** and corporate plans, in line with the purpose, the values, the positioning of the Brands, the sustainability plans and in compliance with the guidelines defined by the Group;



ensuring the **consistency of business processes and activities** with the principles of equity, equal opportunity, diversity and inclusion, taking into account all the key dimensions, such as gender, ethnic origin, age, religion, disability, and sentimental orientation;



ensuring the **implementation of the Diversity & Inclusion strategy and plans** also focused on achieving corporate organisational well-being, in collaboration with the relevant corporate functions in relation to the initiatives and processes involved.

During the same year, WINDTRE engaged with its employees through a **Diversity & Inclusion survey**, which served as an initial opportunity for them to express their views on the topics of diversity, equity and inclusion.

The survey was conducted in partnership with the SDA Bocconi centre for Diversity & Inclusion (the DIS Lab) and was open to all WINDTRE's people.

The aim was to learn about their perspectives on important issues, such as:

1. Equity in the main personnel-related processes
2. Respect for diversity
3. Perceptions of inclusion

The survey has registered a participation of 48%.

The results showed that WINDTRE has a culture that is **respectful, inclusive, and attentive to diversity**, and even suggested that there are opportunities for further investments in the field of equity and equal opportunity.

The percentage of women by contract level (%) [GRI 405-1b]	2021	2020	2019	2018	2017
White collar	52%	51%	51%	50%	51%
Supervisors	27%	26%	26%	25%	26%
Management	28%	26%	23%	22%	22%
Total	49%	48%	48%	47%	47%

Gender diversity [GRI 405-1a]	2021	2020	2019	2018	2017
Women on the Board of Director	17%	17%	17%	0%	0%
> 50 years old	100%	100%	100%	100%	100%
Women on the Executive Committee	14%	14%	14%	13%	9%
> 50 years old	100%	100%	100%	100%	100%
Women senior leadership positions	28%	26%	23%	22%	22%
30-50 years old	43%	50%	61%	59%	63%
> 50 years old	57%	50%	39%	41%	37%
Women hired	43%	49%	48%	54%	47%
< 30 years old	65%	60%	66%	67%	56%
30-50 years old	29%	30%	33%	33%	44%
> 50 years old	6%	10%	2%	0%	0%



AWARDS OBTAINED

In 2021 WINDTRE was once again included by the German Institute of Quality and Finance among the ranking of **Italy's 200 Best Employers for Women** and was again certified as a **Top Job Best Employer**, ranking among the top 300 employers in Italy for its corporate culture, the values it represents, and the career opportunities it promotes.

Using the social listening methodology, WINDTRE was also certified as one of the most desirable companies to work for - **Italy Best Employer 2022 (Statista & Corriere della Sera)** - and as an employer that's attentive to promoting diversity throughout its organisation - **Leader in Diversity 2022 (Statista & Financial Times)**.

Finally, WINDTRE is **the world's first telecommunications company to obtain the Equal Salary certification**, an officially recognized certification granted by an independent foundation (EQUAL-SALARY Foundation) to Companies that comply with the related requirements in terms of pay equity between women and men. The voluntary audit, is based on a rigorous methodology developed in collaboration with the **University of Geneva**, and with the involvement of PwC. The certification confirms that there is no significant pay gap between women and men with equal qualifications and duties, and that the Company has implemented **robust HR and Diversity & Inclusion policies**. The Certification is valid for 3 years. Every year is conducted a monitoring review of the progress of corrective actions identified during the first audit.



THE #VOCEALLEGAMER CAMPAIGN

The Certification is valid for 3 years. Every year is conducted a monitoring review of the progress of corrective actions identified during the first audit. In 2021, WINDTRE took an active stand on the issue of digital inclusion and responsibility with a social experiment, the results of which are now visible online in the #VocealleGamer video. Posted on the International Day for the Elimination of Violence against Women, the **video tackles the topic of inclusion** by address a specific context, that of **online gaming**, which is still perceived as predominantly male field, although the reality of the situation is that 47% of Italy's online players are female.

The social experiment entailed having professional gamer Tuberanza play online as a woman, with a digitally altered voice. Based on the comments and insults received from other players, it soon became clear that it's still difficult for girls to freely express their identity in the gaming world without being laughed at or attacked. They therefore have to turn off their microphones to conceal their identities.

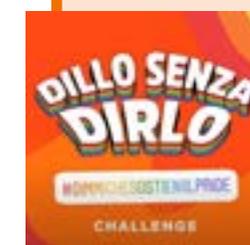
The purpose of the video was to **raise awareness of gender discrimination**, which can even take on the form of preventing girls from simply being themselves online.

#DIMMICHE SOSTIENI IL PRIDE

During the month of June 2021 (Pride Month), WINDTRE launched an **online challenge to support diversity and inclusion**. Together with radio speaker and activist Diego Passoni, WINDTRE invited its virtual community to create videos in support of Pride and the issues it promotes, to be published on the social networks with the hashtag **#DimmiCheSostieniilPride (#TellMeThatYouSupportPride)**. The results were surprising: 12.8 million reactions - 130,000 interactions - 89%



CLICK HERE TO WATCH THE VIDEO



INCLUSION OF PEOPLE WITH DISABILITIES



- What it means to us
- Why it's important
- Our goals
- Disability Hub
- The E-Health 'Full Care' solution
- Information accessible to all



WHAT IT MEANS TO US



Listening and promptly responding to the needs of people with disabilities, even through dialogue with the relevant associations and non-profit organisations



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



Making our digital channels **accessible to everyone**

WHY IT'S IMPORTANT



40%

The percentage of people with disabilities who do not feel adequately valued by their companies

positive sentiment. Many young influencers also took part in the campaign, especially on the TikTok platform.

Aware of the fact that creating a workplace that's inclusive and welcoming for all workers constitutes a true organisational process, the inclusion of people with disabilities at the workplace is a commitment that more and more companies are embracing.

However, there's still a long way to go: today, **40% of people with disabilities do not feel adequately valued by their companies**, and 46% do not consider the companies for which they work to be places where they're able to express their full potential⁵².

One of the main difficulties lies in the fact that disabilities can vary considerably, and, above all, not all of them are evident.

Disabilities frequently arise during a person's lifetime, and are often invisible, and for this reason they aren't taken into consideration by others⁵³.

The human factor is one of the most efficient tools for managing these types of situations, and the introduction of the **Disability Manager** figure, who's tasked with establishing practices and relations aimed at ensuring the inclusion of people with physical and mental disabilities, is a fundamental step in the company's evolutionary journey.

It's also important to recognise the different needs of your users and customers outside the workplace.

In 2021, the telecommunications sector took another step forward to ensure the inclusion of people with disabilities.

⁵² *Dynamo Academy: People with disabilities, 40% do not feel valued as individuals by their companies, 2021*

⁵³ *Fondazione ISTUD: Disabilities and Work, 2021*



41%

The percentage of people with disabilities who say they have to work harder to be considered equal to their peers without disabilities

(World Economic Forum, 2021)



Over 1 billion

The number of people with disabilities worldwide in 2021

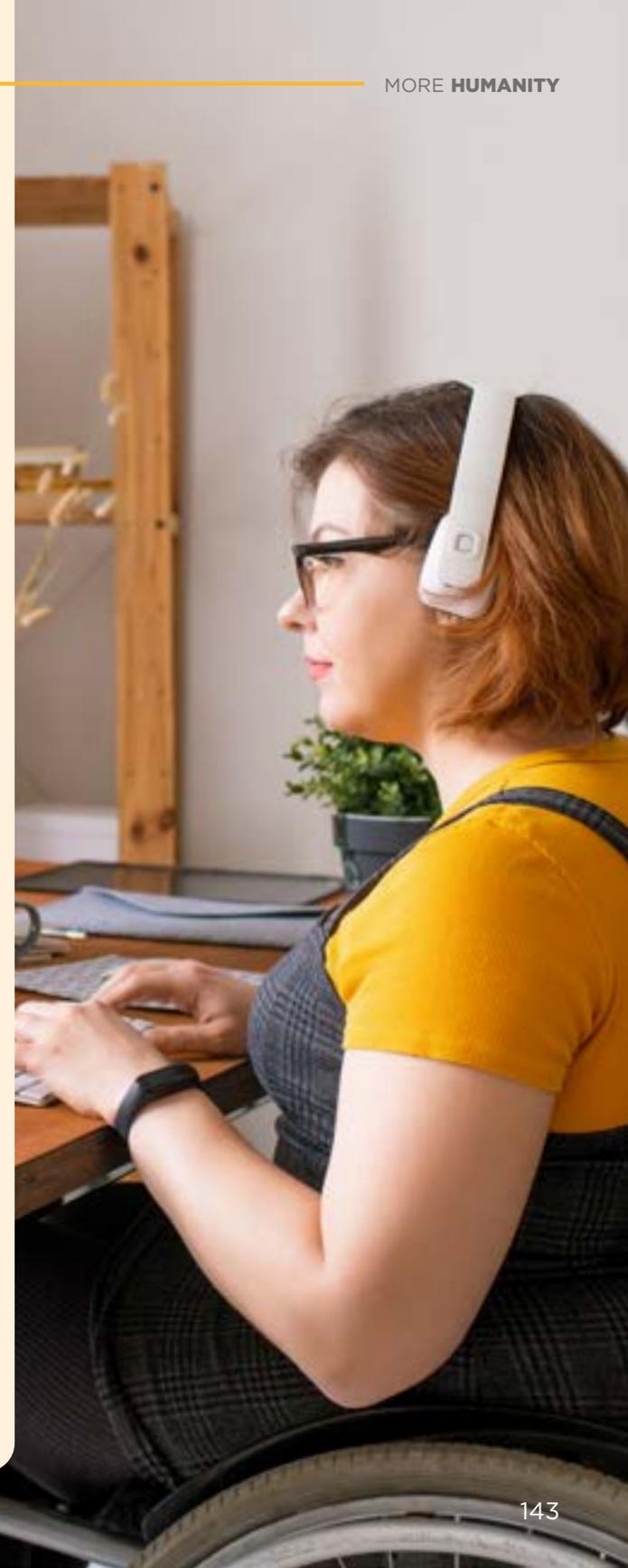
(WHO, 2021)



35%

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

(Il Fatto Quotidiano, 2021)





THE TOOLS

Computer vision technologies help blind people perceive the surrounding world more easily



The Communications Authority adopted a new resolution on **pricing discounts for the fixed and mobile network**, and the current recipients also include people with severe mobility limitations, as well as people with severe vision and hearing impairments⁵⁴.

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.

⁵⁴ AGCOM: Resolution 290/21/Cons, 2021

OUR GOALS

DIGITAL ACCESSIBILITY FOR PEOPLE WITH DISABILITIES BY 2024



MIRKO RUGARLI

Sustainability Ambassador

Head of Customer Experience & Data Analytics

"We want to ensure that all information and customer support/ assistance tools are easily accessible to people with disabilities"

COURSES OF ACTION

To make the company's digital channels **fully accessible** to people with disabilities

Fully accessible communication and reporting through the use of subtitles and Italian Sign Language

Expansion of the range of products and services with solutions dedicated to people with disabilities

Creation of customer **support services accessible** to people with disabilities

WHERE WE ARE AT

Creation of an internal Disability Hub for collecting reports and suggestions from employees

Publication of **fully accessible versions** of the 2020 Sustainability Report & 2030 ESG Goals

A promotion for people with vision and hearing impairments and a **dedicated support line** have been made available

The accessibility level of the websites and self-service channels **has been improved**

DISABILITY HUB



The **Disability Manager** is the internal WINDTRE figure who's responsible for the management of initiatives, projects and analyses aimed at improving working conditions and the use of technological tools for people living with one or more disabilities. The role was established in 2019, and is exercised in both relation to the employees, as well as outside the company, with a commitment to developing projects, partnerships, and services aimed at simplifying the daily lives of people with special needs, often through partnerships with organisations and associations operating in this field.

One of the initiatives that the Disability Manager has launched is the creation of a **Disability Hub on the company's intranet**. This section of the intranet site allows WINDTRE employees to submit reports or requests for assistance to the Disability Manager, or to obtain information and articles on disability-related issues.

In order to better manage the requests submitted via the intranet site, a **Disability Committee** has been set up, which is responsible for finding solutions to the employees' requests, such as the adapting the workstation, providing support devices, or adjusting the working hours.

Thanks to the support of WINDTRE's Disability Manager, it was possible to transpose all the indications regarding the accessibility of digital telecommunications services contained in EU Directive 2018/1972, which established **the new European Electronic Communications Code**, which came into force on 20 December 2020. In this regard, a collaboration has been initiated with the Italian Union of the Blind and Visually Impaired (UICI) non-profit organisation for the study, development and implementation of new digital accessibility solutions. In order to formalize WINDTRE's commitment to the inclusion of disabilities, a wor-

king table has been set up to explore and listen to the needs of some of the most common disabilities and adapt the portfolio of WINDTRE offers so that they are accessible to all. For example, with the support of experts, WINDTRE has formulated specific offers for the deaf and blind.

The **Offer for the deaf and blind** includes 25 GB at maximum speed, unlimited minutes and 2,000 SMS at a reduced price, as well as a dedicated helpline via WhatsApp.

THE E-HEALTH 'FULL CARE' SOLUTION

In March of 2021, WINDTRE launched its 'Full Care' offer, aimed at improving the quality of life and day-to-day safety of the elderly and people with disabilities. The offer consists of unlimited voice and data traffic, and the health monitoring **Comarch** Life Wristband, which allows the wearer to monitor their heart rate, track their geolocation, and initiate emergency calls with a simple touch of the display.

INFORMATION ACCESSIBLE TO ALL

In partnership with the Italian Union of the Blind and Visually Impaired Onlus - APS (**the UICI**), WINDTRE is committed to **ensuring the accessibility of the information and digital services that it offers to the public**.

The initiative falls within the scope of the company's ESG Plan, and is specifically aimed to at improving social inclusion by rendering the company's digital tools and channels accessible by 2024, even meeting the requirements of the European Accessibility Act (EU Directive 2019/882) ahead of schedule.

In 2021, WINDTRE held operational round tables with the main company departments in view of the effective partnership with UICI.

A first result of this important partnership was the **publication of the 2020 Sustainability Report & 2030 ESG Goals** in versions **fully accessible even by those who use special aids** or assistive technologies.



CLOSER TO THE COMMUNITY



- What it means to us
- Why it's important
- We're stronger together
- La cartella sospesa
- EduTime

WHAT IT MEANS TO US



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



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



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

WHY IT'S IMPORTANT

According to the survey conducted by Edelman in 2021, companies are **the only entities today that retain the trust of citizens**, with a score of 61/100, while governments, NGOs and the media remain below the threshold of 60 points, albeit with a slight increase with respect to their 2020 scores⁵⁵.

Companies therefore play a fundamental role in supporting the communities in which they operate, as they possess the tools for their development.

This is the meaning of the term **shared value**, which indicates a situation where the economic value generated by a company is shared not only by its *shareholders*, but also by all its stakeholders.

Year-by-year, Italian companies are becoming increasingly interested in making a social and economic contribution to the development of their communities.

In 2020, the value of the donations and contributions made by companies increased by **26.3%** compared to 2019, for a total donation value of **€ 567.1 million**⁵⁶.

In addition, the approach that companies adopted in order to support communities changed in 2020, with renewed attention being placed upon solidarity with more vulnerable groups.

The sharing of the value generated by a company with the community also has benefits for the company itself. On the one hand, it increases the employees' engagement in relation to their employer, as they feel more satisfied and connected to the company, while on the other hand it improves the **company's resilience** in the face of change. In fact, during the pandemic, the most cohesive companies suffered a smaller reduction in turnover than less cohesive companies, and appear to be more prepared for the new Transition 4.0⁵⁷.

⁵⁵ Edelman (2021), Trust Barometer

⁵⁶ SDA Bocconi e Dynamo Academy: Corporate Giving in Italy, 2021

⁵⁷ I Quaderni Symbola (2021): Cohesion is competition



567.1 MILLION EUROS

The value of donations and contributions made by Italian companies in 2020: +26.3% compared to 2019



The global index of confidence in companies in 2022

(Edelman Trust Barometer, 2022)



+26.3%

The increase in the value of donations made by Italian companies in 2020 compared to 2019

(SDA Bocconi and Dynamo Academy, 2021)



13%

The increase in productivity of companies that have embraced a well-structured CSR program

(Submittable, 2021)

WE'RE STRONGER TOGETHER

WINDTRE gets its customers and employees involved in community support initiatives where the company actively participates.

The Company renders its infrastructures available to its customers throughout the year for numerous fund-raising events for charitable causes, and promotes 'cause-related marketing' initiatives to collaborate on **social support** projects alongside non-profit organisations.

As far as its employees are concerned, WINDTRE encourages their active involvement in the solidarity initiatives it promotes, both in terms of direct participation and in terms of shared choice. The main initiatives promoted by WINDTRE are:



Race For the Cure - In May of each year, the WINDTRE employees participate in the Race For the Cure in Rome, the marathon dedicated to raising awareness and money for the fight against breast cancer. WINDTRE makes a "matching donation" for the amount collected by the employees with their registrations.



Italian Red Cross and Avis - Thanks to its valued partnership with the Italian Red Cross and Avis, WINDTRE organised the days dedicated to employee blood donations at its headquarters in Rome, Milan, Ivrea, and Pozzuoli until the beginning of the pandemic in 2020. A small gesture of solidarity that has a major impact.



Charity Hub - The dedicated section on the company's intranet where users can find all the non-profit organisations and other associations with which WINDTRE collaborates. For example, in 2021 the company collaborated with: Doctors Without Borders, WWF, LAV, Made in Carcere, Sports without Borders, and The Community of Sant'Egidio.

Charity Collections - For many years, WINDTRE has been offering a charity collection service to non-profit organisations (ETS) in collaboration with other Italian telephone operators. This service allows customers to make donations by sending an SMS or by calling from a landline. The funds raised are entirely transferred to the charity running the project supported. In 2021, WINDTRE raised and paid out over **€ 2.1 million**, supporting a total of **93 social and humanitarian initiatives**. In 2021, Wind Tre also participated in the public consultation that led to resolution 85/21/CIR concerning the new discipline for solidarity collections via SMS, and is actively participating in the technical round tables for the implementation of the same.

Made in carcere - The main purpose of the Made in Carcere initiative is to disseminate the philosophy of giving female inmates a "Second Chance" and giving fabrics a "Second life". It's a concrete message of hope and solidarity, as well as one of freedom and respect for the environment. For this reason, WINDTRE decided to donate its sales staff's old uniforms to this organisation, in order to reuse the fabric and resell the regenerated product.

WINDTRE also promotes the **Insieme si Può** (Together We Can) project, which allows all the employees to propose and vote on charitable initiatives via the company intranet, which in turn will receive a contribution from the company.



LA CARTELLA SOSPESA

In order to provide targeted support to the most disadvantaged segments of the population during the lock-down, in 2020 the Insieme si Può Committee decided to allocate all the project funds to the Cartella Sospesa initiative which, launched at the end of 2020, lasted until the first months of 2021.

The goal of the Cartella Sospesa initiative is to **reduce the digital technology gap between Italian families**, which became increasingly evident during the pandemic, with all the economic and social consequences it entailed.

Through the Cartella Sospesa project, WINDTRE provided school kits to 500 children in difficulty, including stationery items and 30 tablet computers, in order to allow the more needy children to participate in remote learning activities, thus avoiding the negative impacts from loss of schooling.

EDUTIME

During the first few months of 2021, the **EduTime** initiative continued in support of **students** who once again found themselves in DAD.

The initiative offers **50 free GB of data** to be used Monday through Saturday until 3 p.m. for study purposes, and that's not all. Dedicated to all Under 25 customers with a WINDTRE voice or Internet offer, EduTime is also part of the activities to support young people.



It's EDU Time!



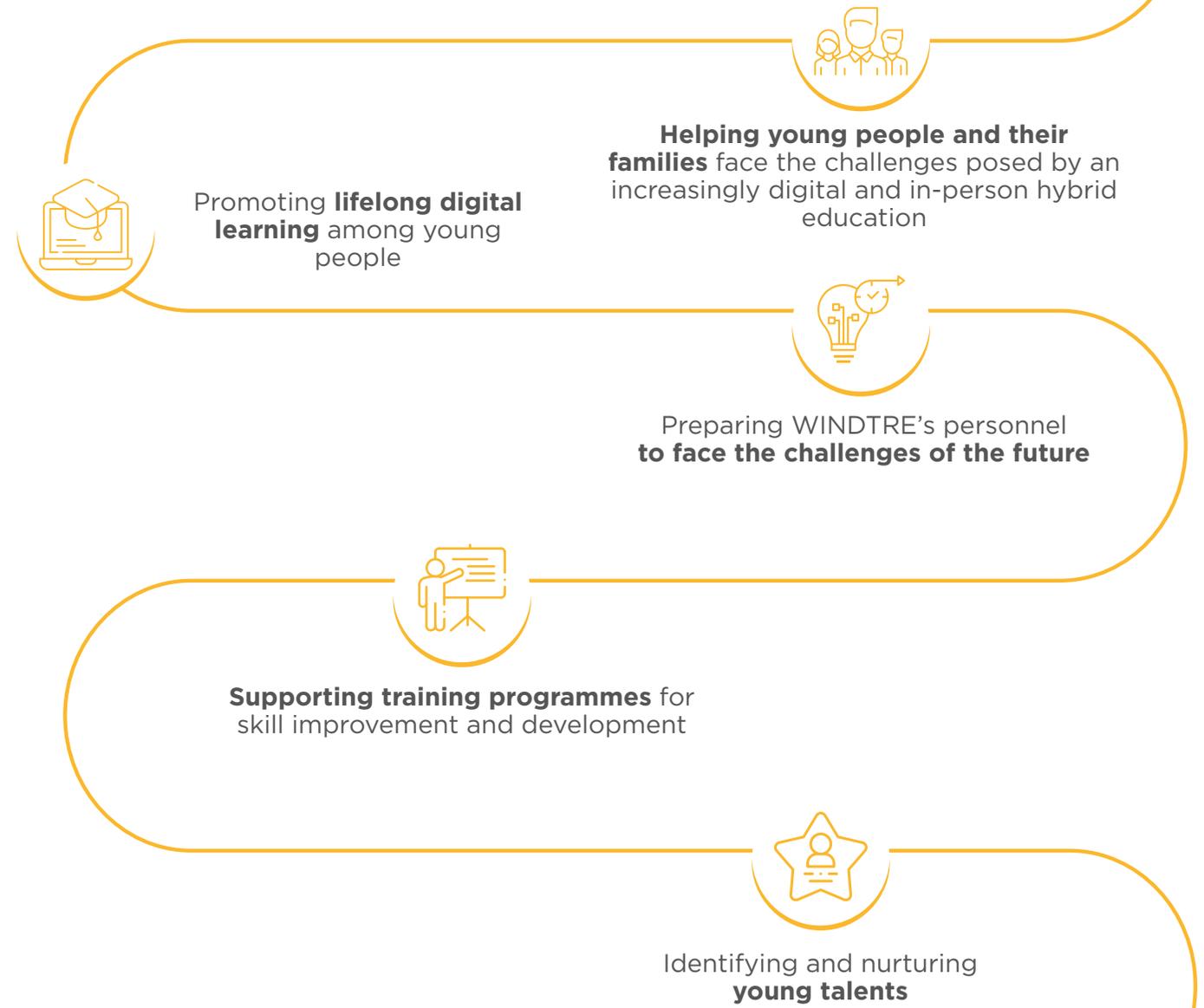
[BACK TO SUMMARY](#)

LIFELONG DIGITAL LEARNING



- What it means to us
- Why it's important
- Our goals
- Closer to young innovators
- A company tailored to Generation Z
- Continuous skill development
- Training for the Future
- Jobs of the future - the future of jobs
- Training and dialogue on sustainability
- Voices about the future

WHAT IT MEANS TO US



WHY IT'S IMPORTANT



While the world is constantly evolving, this process has **accelerated dramatically over the past two years, especially in terms of the way we work and the tools we need to carry out daily tasks**, giving rise to new daily routines and new challenges. For the post part, this change has been facilitated by automation and digitisation, which have led to a decreased demand for routine and manual tasks, and have highlighted the need for new cognitive and/or interpersonal skills.

The emergence and increased demand for new skills, especially in the industry 4.0 arena, and the absence of appropriate training, have generated a skill gap on today's labour markets. In order to bridge this gap, in July of 2020 **the European Commission published the European Skills Agenda: a five-year plan to help individuals and businesses develop and upgrade their skills**⁵⁸, with the aim of improving sustainable competitiveness, guaranteeing social equity, and ensuring greater resilience. One of the strategy's fundamental points is the concept of lifelong learning, which entails the development of organisational processes designed to upgrade the skills of professionals and ensure continuous training over time. In fact, companies that invest in lifelong learning programmes have a 58% better chance of effectively responding to change⁵⁹.

While **lifelong learning for professionals at the workplace has now become an integral part of how companies are organised**, the first step in training the workers of the future lies with the schools and universities. Today, just 36% of young Italians between 16 and 19 years of age possess adequate digital skills, and less than 40% of those employed in the ICT sector have a university education⁶⁰, and there's concern that these numbers will be insufficient to successfully address the transformation underway.

⁵⁸ European Commission (2020): COM (2020) 274 final

⁵⁹ Deloitte (2021): Leading in learning

⁶⁰ Istat (2021): 2021 Annual Report. The state of the Country



+16%

The increase in online training activities attended by Italian children between 16 and 19 years of age in 2020 with respect to 2019

(Istat, 2020)



70%

The percentage of European adults between 16 and 74 years of age who, according to the European goals, will have at least basic digital skills by 2025 (56% in 2019)

(CE, 2021)



36%

The percentage of young Italians between 16 and 19 years of age who had digital skills in 2019

(Istat, 2021)

OUR GOALS

100% "FUTURE READY" PEOPLE BY 2025



SERGIO GONELLA

Sustainability Ambassador

Head of Culture, Development, Inclusion & Talent Acquisition

"We want to prepare WINDTRE's people for the challenges of the future by supporting their employability and investing in lifelong learning"

COURSES OF ACTION

To develop a digital mindset and upgrade the personnel's skills to face the challenges of the future

To retrain the personnel and upgrade their skills based on the market's needs

To promote a culture of lifelong learning and self-development

To promote the use of personalised training based on individual needs and aptitudes

WHERE WE ARE AT

Updating of the WINDTRE Workforce Plan for 2025, and identification of 28 skill areas (hard and soft) that will be crucial for the future

Over 270,000 hours of training provided in 2021

CLOSER TO YOUNG INNOVATORS

In 2021, the partnership with Bosch, the Triulza Foundation and Concept Reply continued with the Hack&Go! Project: **the hackathon dedicated to the sustainable Smart City innovation**. The initiative is open to all university students, and is intended to spark discussion about how certain technologies, like 5G, Big Data and IoT, can be integrated with mobility and other services for citizens.

As well as offering a stimulating competition between peers, the initiative included several orientation sessions and in-depth studies on a number of technologies applied in the context of Smart Cities or Smart Life, in an attempt to **bring young students closer to and familiarise them with the main challenges posed by the need to redesign the places we live in** and the services we use.

WINDTRE ran the first session of the hackathon, focusing on the Big Data and Industrial IoT challenge. The winners with the best project ideas were awarded a **6-month internship to develop the project in the company**.

WINDTRE was also the main sponsor of **TEDxLuiss 2021**: a conference dedicated to putting innovative ideas into circulation as inspiration for the world of the future. The key topic of the conference was the construction of a new post-pandemic normality based on a sense of responsibility, trust, and inclusion, in which everyone takes courageous action to make a difference.



A COMPANY TAILORED TO GENERATION Z

For WINDTRE, 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 can offer.

This is the focus of the **OnStage Internship Programme**, which has now reached its sixth edition in 2021. In this programme, graduates or recent graduates are supported by a Tutor, who assists them in carrying out a 6-month internship.

A training course is also provided during this period, consisting of 6 meetings held on a monthly basis, focused on the development of hard and soft skills. All activities during the internship programme are geared towards creating and consolidating an OnStage Community, where young talents can collaborate, share experiences and strengthen their professional network.

The programme was **revamped in digital mode for 2021, with the participation of 40 recent graduates**, 19 of whom were hired by WINDTRE at the end of their internship. A special focus is also placed on Personal Branding: through discussion with a professional coach, WINDTRE interns had the opportunity to learn how to recognise and enhance their own unique personal brand, both online and offline. As of 2021, the recent graduates incorporated among the company's personnel have the opportunity to take advantage of a special training package managed in partnership with **Telethon**, included in the New Generation Programme: the WINDTRE development and training programme dedicated to young new hires.



The training experience consists of two days:

- On the first day, which is more focused on the theoretical aspects, **Telethon tells its story, starting with the WINDTRE values** and how they are also an integral part of the Foundation's own history and mission, thus highlighting the partnership between the two organisations, and the reason for which it was established. The first edition concentrated on how closely the values are linked to the business results, and how important they are for achieving them, which is why they serve as a constant reference point throughout everyone's daily work activities.

The second day is much more experiential in nature, and consists of a **visit to the NEMO Centre** for rare neuromuscular diseases at the Gemelli Hospital in Rome, where the new **WINDTRE staff members meet with patients and listen to their stories**.

The day continues with additional testimonials from researchers and patients (both live and on video), and the experience ends with a group activity summing up all the considerations, concepts, and keywords that arose throughout the two days, and how they might be applied at the Company.

Once again with the aim of creating a bridge between the academic and professional worlds, in 2021 WINDTRE took part in numerous **Virtual Career Days, Tech Events, and talks, as well as two Academies on Data Science and Cybersecurity in partnership with the Polytechnic University of Milan**, involving its own professional figures as testimonials, and maintaining a keen awareness of the issue of gender balance, highlighting female role models in the STEM field wherever possible.



40 NEO GRADUATES

They virtually participated in the project Internship Program OnStage, in 2021. At the end of the course 19 people were hired in WINDTRE



OVER 270,000 HOURS OF TRAINING

provided during 2021, of which more than 14,000 were about health and safety

Another professional training course was launched in 2021: the **Technology Ops Growing Camp**. The initiative, which is intended for graduates of the Federico II University of Naples, consisted of a course of 8 masterclasses taught by WINDTRE managers, and covered topics such as artificial intelligence, process automation, cloud transition, and DevOps modelling.

WINDTRE focused also on acquiring **essential professional figures with digital skills**, above all talents in the fields of Big Data & Analytics (i.e. Data Scientists and Data Engineers) and Technology (i.e. Cyber Intelligence Specialists and Automation Engineers). Once the talents were identified, an Onboarding process was begun, which consists of an alternation of training modules held by internal managers and teachers, for an in-depth analysis of WINDTRE’s positioning and identity, and meetings with company stakeholders, in order to accelerate the induction process.

CONTINUOUS SKILL DEVELOPMENT

GRI 404-2

The programmes for WINDTRE personnel dedicated to **technical, digital, regulatory, linguistic, technological, and soft skills** training continued in 2021, available to all employees for any age.

Among these, the **Digital Mindset and Skill Development** programme launched in 2020 under the New Skills Fund was repeated.

The initiative is aimed at preparing WINDTRE’s personnel for the **challenges posed by the digital transformation**, and developing the necessary skills through a multi-year training course, which involves the entire company and is carried out in collaboration with MIP, the Business School at the Polytechnic University of Milan.

The **Technology Department** offered several training modules geared towards the **acquisition of new technological skills**.

The main topics covered were: 5G Access Network, Six-Sigma, Unix SQL, Infrastructure Maintenance, Virtualisation and Containers, as well as other sector-specific technical/specialised topics.

Soft skill training also continued, and was open to all WINDTRE employees via the **digital ConversatiON platform**. The Easy Learning training catalogue, the module dedicated to online training, consists of 31 courses organised into 7 thematic areas. The courses can be assigned to employees by their managers as part of the Performance Development process, or else they can be used by all the employees for self-learning purposes, with no limitations.

Furthermore, following a union agreement of 2021, employees who meet the minimum requirements for old-age or early retirement in the five years following their termination of the employment relationship, will be able to apply for it by registering through an application on the company intranet.

Training (hours) [GRI 403-5] [GRI 404-1]	2021	2020	2019	2018	2017
Total training	276,009	107,745	108,435	93,293	61,035
of which health and safety training	14,587	20,490	26,885	16,109	8,027
Average training per person	41.2	15.6	15.7	13.4	7.5



TRAINING FOR THE FUTURE

Transforming the crisis into an opportunity: this idea gave rise to the concept of **"Training for the Future. Managerial challenges of the 21st century"**, a book that explores and analyses the considerable changes that all companies, large and small, have had to cope with due to the Covid-19 pandemic, reorganising their work relations accordingly. Jeffrey Hedberg, CEO of WINDTRE up until 2021, and Rossella Gangi, Human Resources Director, contributed to the volume, which was edited by Franco Angeli and Gabriele Gabrielli, President of Fondazione Lavoro per la Persona and a professor at LUISS Guido Carli University.

The text includes contributions by thirteen authoritative figures, which focus on topics relating to the current scenario, starting with the extraordinary situation we've all been experiencing in recent years.



JOBES OF THE FUTURE – THE FUTURE OF JOBS

The **Jobs of the Future and the Future of the Jobs** project was launched in 2020 in an effort to better tackle the challenges of the future and understand how companies have to adapt to the new needs, and culminated in a report by the same name in December of 2021, with the aim of guiding the preparation of the **WINDTRE Workforce Plan for 2025**.

The goal of the project is to implement a **re-skilling/up-skilling** plan in order to increase the competitiveness of the current workforce, by **mapping both the existing skills and emerging skills** over the next 3-5 years.

In support of the project, a monitoring database has been created in order to monitor the supply and demand trend on the labour market. 42 key executives and 37 specialised partners and experts from the TELCO industry were interviewed for its creation.

The analysis led to the identification of **15 development trends** in the field of labour (broken down into 4 areas: People, Market, Business and Technology), as well as **25 emerging and growing professions**, and **28 skill areas** (hard and soft skills) that are crucial for the future, for which action must be taken in terms of training and development.



25 EMERGING PROFESSIONS

Identified within the project Jobs of the Future



TRAINING AND DIALOGUE ON SUSTAINABILITY

2021 marked another step forward in terms of spreading the **culture of sustainability** throughout all levels of WINDTRE. Created in partnership with the **Luiss Business School**, Responsibility - Development of a Sustainable Approach programme was attended by more than 200 WINDTRE managers since the second half of 2020, and upon its conclusion the company proposed all **2030 Agenda** course to all of its employees. Created in collaboration with ASviS (the Italian alliance for sustainable development, which reunites over 290 of civil society's most important institutions and networks), the course consisted of three modules outlining the reasons for which large, medium and small companies alike are in need of a **sustainable business model transformation**. The complete course, consisting of all three modules, was attended by over **5,800 people**.

Due to the need to keep people up-to-date on the activities introduced by all the company departments ESG topics, as of December 2020 **all WINDTRE employees will receive a bimonthly sustainability newsletter**.

The Newsletter contains updates on the numerous initiatives underway, useful suggestions to encourage the staff's engagement, and updates and news items on issues that the company holds dear, complete with editorials by various company managers and articles by prominent personalities in the field of sustainability.

In July of 2021, the topic of sustainability was the main focus of the **fifth edition of the Company Talks** programme: a series of live streams on topics considered to be priorities by the WINDTRE personnel, which are broadcast over the company's intranet. The fifth edition was opened, for the first time, by CEO Jeffrey Hedberg, and was attended by numerous guests, including the WINDTRE Ambassadors, who discussed the programme and the commitments undertaken with the 10 goals of the WINDTRE's 2025-2030 ESG Plan.

VOICES ABOUT THE FUTURE

During the fifth edition of the "Sustainable Development Festival", Italy's first and most important event on the topics of sustainable development, WINDTRE was a partner sponsor of the "Voices about the future" series, which consisted of **6 streaming forums created by Italy's ANSA news agency, dedicated to the issues of the future of our infrastructures, mobility, disability, and digital education**, which were attended by experts and industry professionals, who outlined many of the most recent and possible future developments.

WINDTRE was the initiative's main partner, and directly participated in three of the six forums with its own managers and experts, in order to stimulate an active dialogue on the topics, and to help promote a culture of sustainability on a national scale.

VOCI SUL FUTURO

— SEI INCONTRI ONLINE PER CAPIRE IL FUTURO CHE VOGLIAMO

PARTECIPANO —

ENRICO GIOVANNINI | EMMA MARCEGAGLIA | STEFANO BOERI
CRISTINA BOWERMAN | LUCA PANCALLI | PATRIZIO BIANCHI

Segui la diretta streaming su festivalsvilupposostenibile.it, asvis.it, ansa.it
 Pagine Facebook dell'ASviS e di Ansa

FESTIVAL DELLO SVILUPPO SOSTENIBILE Promosso da ASviS ANSA In collaborazione con WINDTRE

BACK TO SUMMARY



NEWSLETTER

Starting from December 2020 all WINDTRE employees receive a bimonthly Sustainability Newsletter

CLOSER TO OUR PEOPLE



- What it means to us
- Why it's important
- The WINDTRE team
- Top Employer 2022
- Human Working
- Attention to people
- Welfare4Me
- Health and safety

WHAT IT MEANS TO US



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, like nursery schools and shopping vouchers

WHY IT'S IMPORTANT



65%

The percentage of employees that consider work-life-balance a difficult goal to achieve within the work context

The success of every business is primarily dependent upon the well-being of its personnel, and the pandemic highlighted the importance of this factor.

Stress, burnout and anxiety are among the main factors that worsen a company's performance⁶¹, and must be countered with well-being initiatives that enable employees to feel satisfied and at ease at the workplace. In a recent Ipsos survey, about 45% of employees interviewed in 30 countries stated that they had suffered a deterioration in their mental health due to the pandemic (54% in Italy), and this has raised expectations in terms of corporate well-being.

The survey also showed that 65% consider work-life-balance to be a goal that is still difficult to achieve within the work context, and view it as a factor that's even more important than remuneration⁶².

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

Due to the pandemic, training methods have changed over the past year, with a transition towards digital solutions like distance learning and e-learning. This transition wasn't easy: only one in 4 companies was able to immediately adapt its training strategies, and **50% of employees considered their company's approach to digital training to be inadequate⁶³**.

⁶¹ Ipsos and AON: 2021 Global Wellbeing Survey, 2021

⁶² Ibid

⁶³ Fosway Group: How is Covid-19 Changing Learning?, 2021



87%

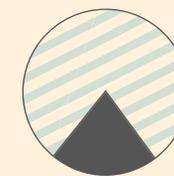
The percentage of companies worldwide offering employee well-being initiatives

(Ipsos, 2021)

48%

The business opportunity gap between multinationals with a more or less virtuous record on gender equality

(McKinsey, 2020)



21%

The percentage of European companies that digitised their training courses in 2020

(Fosway Group, 2021)

THE WINDTRE TEAM



As of 31 December 2021, WINDTRE's staff consisted of 6,693 people, 49% of whom are women. **The percentage of women is constantly on the rise, especially among the executives, which increased from 22% in 2018 to 28% in 2021.**

As of 2020, the spontaneous and subsidised turnover rate had slightly increased from 2.6% to 3.1%. All the employees have permanent contracts, in line with previous years, and 80% have a full-time contract. Part-time contracts are mainly requested by female workers.

Since 2017, WINDTRE has been conducting an **engagement survey**, called #diciamolanostra, with which it collects feedback and shares results in a spirit of transparency and continuous improvement. With **4,799 questionnaires collected and a participation rate of 73%**, the #diciamolanostra survey in November 2021 recorded a significant improvement in all the categories surveyed, both compared to past years and to external benchmarks (145 Italian Top Companies), placing WINDTRE in the **Top Companies in Italy for Employee Experience**, with an Employee Engagement rate of 87%.



28%

The share of women executives in WINDTRE, up from 22% in 2018

Change in workforce (hires) [401-1]	2021				2020				2019			
	Center	North	South	Total	Center	North	South	Total	Center	North	South	Total
Women	40	12	0	52	8	9	3	20	14	42	2	58
< 30 years old	28	6	0	34	4	8	0	12	6	32	0	38
30-50 years old	11	4	0	15	3	1	2	6	7	10	2	19
> 50 years old	1	2	0	3	1	0	1	2	1	0	0	1
Men	45	19	6	70	7	12	2	21	16	42	4	62
< 30 years old	28	10	1	39	2	2	1	5	6	28	1	35
30-50 years old	16	9	5	30	4	10	1	15	10	14	3	27
> 50 years old	1	0	0	1	1	0	0	1	0	0	0	0
Total	85	31	6	122	15	21	5	41	30	84	6	120

Change in workforce (terminations) [401-1]	2021				2020				2019			
	Center	North	South	Total	Center	North	South	Total	Center	North	South	Total
Women	23	44	14	81	14	38	18	70	32	65	27	124
< 30 years old	1	4	0	5	0	6	0	6	1	9	0	10
30-50 years old	14	30	12	56	9	23	18	50	27	47	26	100
> 50 years old	8	10	2	20	5	9	0	14	4	9	1	14
Men	44	61	22	127	34	56	17	107	52	100	18	170
< 30 years old	2	4	0	6	2	4	1	7	2	11	0	13
30-50 years old	13	21	7	41	18	26	10	54	27	59	16	102
> 50 years old	29	36	15	80	14	26	6	46	23	30	2	55
Total	67	105	36	208	48	94	35	177	84	165	45	294

Distribution of the workforce by contractual level [GRI 405-1b]	2021		2020		2019		2018		2017	
	Total (no.)	%								
White collar	5,914	88%	6,008	88%	6,133	88%	6,307	88%	6,209	88%
Supervisors	627	9%	667	10%	681	10%	695	10%	711	10%
Management	152	2%	146	2%	143	2%	155	2%	170	2%
Total	6,693	100%	6,821	100%	6,957	100%	6,887	100%	7,090	100%

Employees by age group with full time contracts [GRI 405 - 1b]	2021	2020	2019	2018	2017
< 30 years old	2%	1%	1%	2%	2%
30-50 years	67%	67%	72%	76%	84%
> 50 years	32%	33%	27%	23%	20%



TOP EMPLOYER 2022

For the fourth consecutive year, WINDTRE has been awarded the **Top Employer Italia** title by the Top Employers Institute, as an acknowledgement of the company's commitment to taking care of its employees.

The certification is the official recognition of corporate excellence in HR policies and strategies geared towards the satisfaction of people and the improvement of the working environment.

It is awarded to companies that achieve the high standards required by the HR Best Practices Survey in key areas such as **People Strategy, Work Environment, Talent Acquisition, Learning, Well-being, Diversity & Inclusion.**

Distribution of employees by contract (n.) [GRI 102-8a]	2021			2020			2019		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Permanent contract	3,406	3,287	6,693	3,516	3,301	6,817	3,601	3,350	6,951
Fixed term contract	0	0	0	2	2	4	3	3	6
Total	3,406	3,287	6,693	3,518	3,303	6,821	3,604	3,353	6,957

Distribution of employees by contract, geographic area (n.) [GRI 102-8b]	2021				2020				2019			
	Center	North	South	Total	Center	North	South	Total	Center	North	South	Total
Permanent contract	2,228	2,458	2,007	6,693	2,299	2,512	2,006	6,817	2,339	2,577	2,035	6,951
Fixed term contract	0	0	0	0	0	1	3	4	1	2	3	6
Total	2,228	2,458	2,007	6,693	2,299	2,513	2,009	6,821	2,340	2,579	2,038	6,957

Distribution of employees by working hours (n.) [GRI 102-8c]	2021			2020			2019		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Full-time	3,202	2,122	5,324	3,316	2,107	5,423	3,381	2,109	5,490
Part-time	204	1,165	1,369	202	1,196	1,398	223	1,244	1,467
Total	3,406	3,287	6,693	3,518	3,303	6,821	3,604	3,353	6,957



These are the pillars that have guided WINDTRE in obtaining the certification:

- **CULTURE & VALUES:** believing in people, listening to them and stimulating their courage, responsibility, inclusion and trust.
- **WORKLIFE BALANCE & NEW NORMAL:** care, listening and dialogue, even at a distance, and promotion of welfare services that constantly ensure maximum attention to people's well-being.
- **LEADERSHIP & PEOPLE DEVELOPMENT:** developing a widespread leadership model and a feedback-oriented culture that promotes continuous digital learning, especially on e-skills.

Due to its commitment to innovation, inclusiveness, responsibility and sustainability, the WINDTRE smart working model, called "Human Working", has been recognised as a best practice, and a source of inspiration for Top Employers Italia, and has been included in the **2021 Top Employers Italia eBook**.

The company has always used LinkedIn, the world's largest professional social network, to promote its culture and values on a daily basis. LinkedIn has recognised the company's authoritativeness and ability to create a significant capacity for audience involvement and engagement through its Company Page. For this reason, WINDTRE was awarded two first prizes in the Employer Branding category: **Best Employer Brand on LinkedIn at the 2021 Talent Awards** (3-10,000 FTE category, selected by San Francisco HQ among thousands of cross-industry companies throughout Italy); and Best Employer Branding campaign in Italy, due to the quality, performance and strategy of our Human Working campaign.

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 WINDTRE 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 WINDTRE 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.



ATTENTION TO PEOPLE

In 2021, the **NESSUNA DISTANZA intranet platform**, personally promoted by the CEO and Top Management, remained active: a social wall made available to WINDTRE personnel in order to disseminate the corporate values of Trust, Courage, Inclusion, and Responsibility, through a Value Journey. The page includes contents from the personal and professional experiences of WINDTRE personnel, and interviews with outside personalities. Within the context of its **welfare programmes**, WINDTRE continues to conduct numerous initiatives aimed at helping parents manage their children.

The company has made **nursery schools** available to its employees at its Rome, Pozzuoli and Palermo offices, and **kindergartens** in Pozzuoli and Palermo, in order to guarantee a service that's able to offer quality and flexibility, while at the same time guaranteeing the needs of children. The nursery schools and kindergartens are open 11 months a year, from September to July and accommodate the children of employees aged between 1 and 3 years (nursery school) and between 3 and 5 years (kindergarten). A total of 29 children enrolled in the 2021 nursery school and 17 in the kindergarten.

These solutions are also accompanied by initiatives aimed at helping employees during the summertime, when schools are closed. In fact, WINDTRE offers **summer camps** for children between the ages of 6 and 13, where educational, sporting, and recreational activities are carried out with the support of qualified and dedicated staff, and the company even contributes to their participation fees for up to two weeks.



As of 2020, the initiative changed, offering a reimbursement of the amount spent by the employee. In total, **541 weeks were reimbursed to 452 employees.**

Continuing its commitment to support parents, and with a particular focus on child safety, in October of 2021, in collaboration with Dr. Marco Squicciarini and a team of doctors, paediatricians and instructors from Paediatric Basic Life Support, WINDTRE held **training meetings** on Paediatric airway-clearing and resuscitation manoeuvres for parents at its three offices in Rome, Pozzuoli and Palermo.

WINDTRE also assists employees with the expenses they have to incur for schooling, both through the **School Voucher**, which can be used to purchase school books at zero-interest monthly instalments deducted from their pay cheques, and through the **#schoolreward** initiative, a monthly bonus, lasting for a scholar year (nine months) awarded to children who have achieved excellent results in their lower and upper secondary school courses during the school year. During the course of 2021, the first initiative was exploited by 247 employees, and the **#schoolreward** initiative **awarded 68 bonuses to junior high school students, and 28 bonuses to high school students.**

The company remains committed to supporting those with particular social welfare needs, whether for themselves or their family members, through the **AL TUO FIANCO** initiative, which grants them access to an **expert on the available public and private services.**



SUMMER CAMPS

Dedicated to the employees children between the ages of 6 and 13



#SCHOOLREWARD

A monthly bonus dedicated to children who have achieved excellent results in their lower and upper secondary school courses during the school year



Employees who find themselves facing difficult situations in assisting elderly or disabled family members are thus able to obtain support in finding and booking home care solutions or stays at care facilities. At the same time, information is also provided on the bureaucratic procedures, such as requests for attendance allowance, disability, and accreditation with the National Health System.

In 2021 around 40 WINDTRE employees made use of this service.

In order to promote socialisation among colleagues and improve their state of physical and mental well-being during the pandemic, WINDTRE launched an **online physical activity programme (Welbeing4WINDTRE)** for all its employees. It consists of a digital platform that combines physical fitness with the joy of spending time together, where users can take advantage of live streaming online fitness lessons, completely free of charge, in masterclasses made up exclusively of WINDTRE personnel, and run by selected and highly motivating trainers, which can be attended directly from home either before or after work.

Through the **WINDTRE per Noi** platform, the employees also have access to a series of benefits that they can utilise on a daily basis, such as consultancy services, online temporary shops, and special deals throughout the country. Moreover, in order to facilitate the work-life balance, WINDTRE provides its employees with dedicated services to the wellbeing, such as changing rooms with showers in Rome and Milan headquarters, and concierge, physiotherapist, and nutritionist services.

WELFARE4ME

The 2020 Welfare plan, which was launched in September of 2020 and expires on 21 December 2021, stems from the company's desire to reward and recognise the important commitment and sense of responsibility shown by all employees during these difficult months of the health emergency.

With this same purpose, and to further convey the company's desire to stay close to its personnel, the Trade Union Agreement of 15 June 2021 established the **launch of a new Welfare plan, featuring a new monetary contribution of € 300 for all employees** (as opposed to the € 270 provided by the previous plan), to be used by the end of 2022.

This new plan can be utilised through the Welfare4Me section of the company's intranet, which was already made available with the previous plan, and features a wide range of benefits, ranging from family needs to leisure time, wellness, health, and shopping. The benefit package made available can be customised by each worker based on their specific needs. For example, the contribution can be spent at major consumer goods chains, or by choosing to be reimbursed for school, university or other expenses related to family education and training, for transport costs or for expenses related to care for the elderly.

The results obtained from the 2020-2021 plan and the 2021-2022 plan were both entirely positive: out of approximately 6,700 WINDTRE Group employees, **92% of the total available credit was disbursed just 3 months after launch.**

Occupational Health and Safety⁶⁴ are a priority for WINDTRE, which has instituted a dedicated in-house Management System that complies with the most

⁶⁴ The Health and Safety certification concerns only and exclusively the company Wind Tre S.p.A.



300 EUROS

A monetary contribution for all employees, to be used by the end of 2022

HEALTH AND SAFETY

widely recognised international standards on the subject.

WINDTRE does not merely aim to meet its legal obligations, but strives to surpass these obligations and to constantly improve upon its results by implementing the most virtuous practices available. In this regard, the Management constantly monitors WINDTRE’s performance through all the relevant indicators, in order to make any necessary corrections or changes to its in-house Management System.

As was the case in 2020, in 2021 the pandemic situation once again had an impact on **the incidence of accidents, which decreased significantly** compared to the past.

In fact, the accident rate per million hours worked dropped from 2.7 in 2019 to 0.6 in 2021.



Injury rate per million hours worked (no.)	2021	2020	2019	2018	2017
Employees (during work)	0.6	1.4	2.7	1.5	2.7
Suppliers (during work)	0.1	0.7	0.7	0.5	0.5
Employees (during travel)	0.3	1.0	4.7	3.7	5.6



MORE **GREEN**

DECARBONISATION

SMART TECHNOLOGIES FOR THE ENVIRONMENT

DECARBONISATION



- What it means to us
- Why it's important
- Our goals
- Zero emissions at 2030
- Energy efficiency projects
- Together with WWF for the climate and the Planet
- A new urban forest in Taranto
- Energy Supervisor
- Green Logistics
- Environmental awareness begins at the office



WHAT IT MEANS TO US



WHY IT'S IMPORTANT

According to the latest estimates of the International Panel on Climate Change, **the Member States' current policies aren't yet sufficient to slow the trend of global warming:** at this rate, a temperature increase of 2.7°C⁶⁵ is estimated by the end of the century, well above the 1.5°C limit proposed by the Paris Agreement, and confirmed by the recent COP26⁶⁶.

In order to help combat global warming and achieve a low-carbon economy that won't irreversibly damage the balance of the planet, every company must undertake to reduce the impact of the activities, structures and services that it offers in terms of CO₂ emissions. Technological innovation can be an important ally for every sector.

For example, through the digitisation of buildings and the use of smart control systems, urban digitisation could reduce CO₂ emissions by 350 million tonnes by 2050⁶⁷.

In 2019, the data storage and transfer operations from Data Centres utilised 1% of all global energy demand⁶⁸.

The green and digital Twin transition is a process that's central to the European strategies for achieving climate neutrality by 2050.

Just think that, in Italy, for example, digital technologies will contribute to 50% of the nation's decarbonisation over the next 30 years⁶⁹.

Companies must therefore devise strategies to reduce their emissions, especially those operating in the ICT sector, and must avoid them entirely wherever possible. They must also provide services that will increasingly allow customers to reduce their own emissions.

⁶⁵ IPCC: *Climate Change 2021: The Physical Science Basis*, 2021

⁶⁶ United Nations: *Glasgow Climate Pact*, 2021

⁶⁷ Ispra: *Best Practices in Smart Cities*, 2021

⁶⁸ Capgemini: *Sustainable IT*, 2021

⁶⁹ The European House-Ambrosetti: *Towards a net zero society*, 2021



50%

In Italy digital technologies will contribute to 50% of the nation's decarbonisation over the next 30 years



17%

The percentage of ICT companies worldwide that use renewable energy for their Data Centres

(Capgemini, 2021)



+20.5%

The estimated global increase in greenhouse gas emissions from the ICT sector by 2025

(Capgemini, 2021)



53.6 million

The tonnes of waste generated worldwide by electronic devices in 2019

(Capgemini, 2021)

Out of all climate-altering emissions, **the greatest contributors are CO₂ emissions**. The best way to measure the CO₂ emissions attributable to an organisa-



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

tion is to break them down them into three segments (Scopes):

The environmental impact of the telecommunications industry, which is currently responsible for about 1.4% of global carbon emissions ⁷⁰, **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.



1,4%

The environmental impact of the telecommunications industry is currently responsible for about 1.4% of global carbon emissions

OUR GOALS

100% CARBON NEUTRAL - BY 2030



MASSIMO MOTTA
Sustainability Ambassador
Head of Technology Architecture & Governance

"We want to eliminate net CO₂ emissions (scope 1 and 2) by 2030"

COURSES OF ACTION

Gradual increase in the purchase of green energy

Renovation and construction of solar plants for the in-house production of renewable energy

Modernisation of the WINDTRE radio access network to ensure maximum energy efficiency

Upgrade of the company car fleet to include low emission vehicles

Offset of residual CO₂ emissions

WHERE WE ARE AT

Reduction in CO₂ emissions by 27% from 2017 to 2021 within the context of the partnership with the WWF

13 proprietary **solar power systems**

Collaboration on the **recovery of the WWF oases** closest to the company's headquarters

Energy Supervisor: an ICT solution for the digital management of energy consumption and expenditures •

Planting of over 1,000 trees, in partnership with Arbolia (estimated 2,506 kg reduction in PM10 per year)

Energy efficiency improvement of the company car fleet (80 hybrid or electric cars)

Installation of 17 charging points for electric or plug-in hybrid cars

⁷⁰ La Repubblica: Telco operators are on the front lines of environmental protection, 2022

ZERO EMISSIONS AT 2030



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

The territorial capillarity of the network means that it is **mainly supplied by energy purchased from the national grid** and, to a lesser extent, by the **13 proprietary solar plants** and by several diesel generators for power outages or unserved areas. The same applies to the WINDTRE 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, WINDTRE has been committed to significantly limiting its energy consumption, thus helping to meet the challenge of energy transition while continuing to ensure high infrastructure performance. In keeping with the previous years, in 2021 WINDTRE approved and launched **a plan to eliminate its carbon dioxide emissions (Scope 1 and 2) by 2030**.

The plan maintains WINDTRE's commitment to improving the energy efficiency of its equipment and infrastructures, to the progressive purchase of supplementary renewable energy in a manner that's useful for the national energy system and, finally, to offsetting any emissions that cannot be eliminated.



2030

Year by which WINDTRE has planned to eliminate its carbon dioxide emissions

WINDTRE activities and structures that consume energy from fossil sources	Direct consumption and emissions (Scope 1)	Indirect consumption and emissions (Scope 2)
Network infrastructures	Diesel to power the generators	Electricity purchased from third parties
Civil sites (offices, call centres, shops)	Diesel and natural gas to power the generators and boilers required for heat or electricity	Electricity purchased from third parties
Transport	Fuel for proprietary or leased vehicles	Electricity purchased from third parties

Energy consumption (GJ)	2021	2020	2019	2018	GRI
Consumption of fuel from non-renewable sources	93,335	95,047	137,158	145,906	GRI 302-1a
Consumption of fuel from renewable sources	1,260	1,260	1,328	2,201	GRI 302-1b
Electricity consumed	2,981,856	2,864,670	2,927,882	2,955,123	GRI 302-1c i
Total	3,076,451	2,960,977	3,066,366	3,103,229	GRI 302-1e

Greenhouse gas emissions (Tonnes of CO ₂ eq.)	2021	2020	2019	2018	GRI
Direct (Scope 1)*	6,421.7	6,494.1	9,408.9	10,010.0	GRI 305-1a-b
Indirect location-based (Scope 2)*	195,430.4	219,863.4	224,714.9	230,992.1	GRI 305-2a-c
Total	201,852.2	226,357.6	234,123.8	241,002.1	-
Direct (Scope 1) including conditioning gases refill	2,187.4	3,867.0			
Total including refill (2020-2021)**	204,039.6	230,224.6			

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

** : The emissions associated with the refill of conditioning gases are only available from 2021 for the years 2020-21; for comparison with previous years, these have been highlighted separately

Electric consumption of the sites (KWh)	2021
Network-based stations	571,007,302.1
Technological sites	243,610,078.0
Shops	11,837,285.0
Offices	1,838,640.0
Total	828,293,305.1

ENERGY EFFICIENCY PROJECTS

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

The work carried out involved:

- **replacing the mobile radio network equipment** with the latest generation of energy-efficient equipment;
- **equipping equipment subject to variable operational load** with increasingly advanced energy-saving equipment;
- upgrading the **infrastructures** in which the equipment is housed with external configurations with lower energy cooling needs;
- consolidating and centralising **the technological sites of the Wind and Tre networks** to reduce direct and induced consumption;
- **the radio base stations** and the large plants are 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.

Thanks to improved energy efficiency of the equipment, WINDTRE has substantially **reduced its energy requirements** while at the same time preparing for steadily increasing traffic volumes.

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

Thanks to the continuous automated analyses provided by the monitoring, the company is now able to determine the specific areas of intervention and the direct actions needed to further improve its energy efficiency figures.

Improvement of energy efficiency: no. of BTS with energy saving technologies (no.)	2021	2020	2019	2018	2017
BTS with solar or wind energy	1	1	1	1	2
BTS with free-cooling technology	2,316	2,316*	2,818	2,524	2,482
Outdoor BTS	15,406	15,307	14,026	13,566	12,544
BTS with energy saving technologies	16,592	16,592	16,626	13,273	13,325

(*) The decrease of 502 sites on the free-cooling component between 2019 and 2020 is related to transformation of sites from salt/minishelter to External BTS



TOGETHER WITH WWF FOR THE CLIMATE AND THE PLANET



WINDTRE has been collaborating with WWF Italia in order to analyse and determine its impact in terms of CO₂ emissions since 2017, monitoring its Scope 1 and 2 emissions.

At the end of 2020, WINDTRE achieved its emission reduction targets set under the partnership, and in 2021 celebrated this important achievement with the **Oasis Project**: an initiative under which the company supported the conservation of protected areas by symbolically giving each of its employees 2 sqm of land located in three WWF oases, identified based on their proximity to the company's main headquarters: Vanzago, Macchiagrande and Astroini, which are respectively near the offices located in Rho, Rome and Pozzuoli.

From 2017 to 2021, the overall reduction in CO₂ emissions amounted to over 27%, dropping from 278,229 to approximately 202,000 tonnes of CO₂eq.

Within the context of its partnership with WWF Italia, **the company also supports the #GenerAzioneMare campaign** created by the WWF to protect the landscape and animal species of the Mediterranean Sea, which, threatened by human activities and water pollution, has been defined as a "climate hot spot" by the United Nations, and is an invaluable heritage site, not only for Italy, but for the entire planet.

#GENERAZIONEMARE



WINDTRE customers can contribute to the campaign directly by subscribing to the **WINDTRE and WWF for the Mediterranean** option and donating 50 cents each month. WINDTRE has pledged to double the amount donated, and donates all proceeds to the protection of the most endangered species in the basin, such as the loggerhead sea turtle (Caretta Caretta).

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

A NEW URBAN FOREST IN TARANTO

At the end of 2021, WINDTRE collaborated with Arbolia (a benefit company set up by Snam and the CDP Foundation that's active in the field of urban forestry) **to create an urban forest with over 1,000 trees within the city of Taranto.**

The new green belt is located within the Ancient Greek Walls Archaeological Park, an area of great historical significance near the city centre. Once fully established, the green area absorbs up to **258 tonnes of CO₂ over 20 years, and up to 2,506 kg of PM10 per year.**



Molto più vicini PER UN FUTURO PIÙ SOSTENIBILE

NASCE A TARANTO UN NUOVO BOSCO URBANO
Molto più vicini per un futuro più sostenibile

WINDTRE

ENERGY SUPERVISOR

In order to ensure a constant reduction in CO2 emissions, WINDTRE does not just limit itself to improving its own processes, but supports its customers' commitments to their reducing emissions and energy consumption as well, starting with companies and the Public Administration. In September of 2020, the company launched its **Energy Supervisor service: an ICT solution for the digital management of consumption and energy expenditure.**

The Energy Supervisor service was created in collaboration with Ouvert, a leading Italian company with decades of experience in the field of energy performance analysis and management. Via an entirely cloud-based solution that uses all the most advanced Machine Learning tools, Energy Supervisor provides analyses and estimates useful for determining actions to be taken for energy efficiency recovery and performance optimisation purposes.

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

GREEN LOGISTIC

WINDTRE Logistic **has chosen DHL as its logistics partner.** DHL is a global leader in the logistics sector, and has been pursuing a clear strategy on Green Logistics for several years, with the aim of eliminating all logistics-related emissions by 2050.

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

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

To optimise our environmental footprint -

DHL offers a range of service options to minimise and/or eliminate logistics related emissions, waste, and other environmental impacts throughout the supply chain. These solutions offer the potential for further savings, and have a positive impact on the WINDTRE brand.

To offset emissions - To invest in internationally recognised climate protection projects.



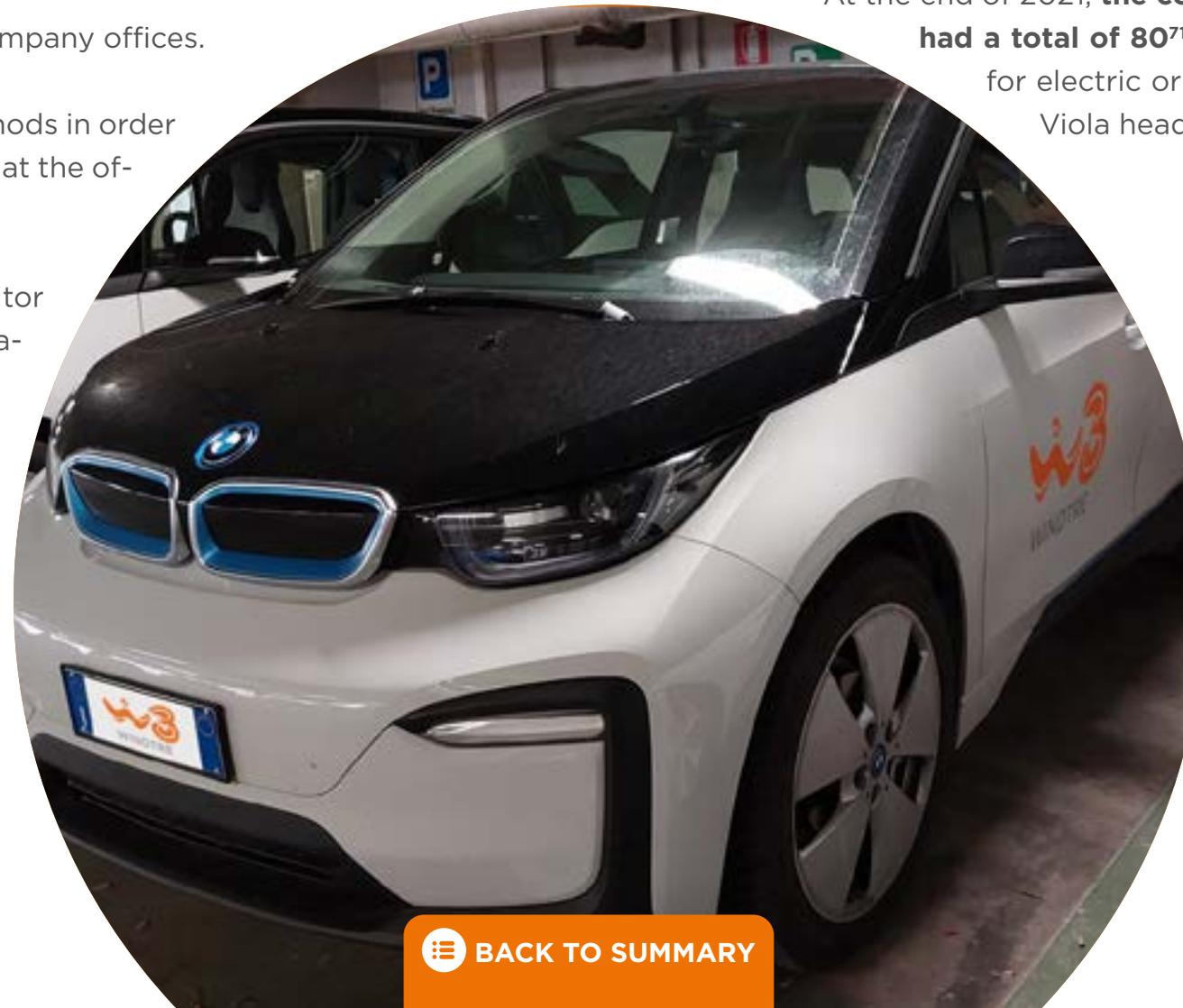
ENVIRONMENTAL AWARENESS BEGINS AT THE OFFICE

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

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

To facilitate sustainable mobility, WINDTRE has 60 shared cars (car-pooling), of which 7 full electric and 21 hybrid, which each employee can access through a Corporate Car Sharing App. This service is available at the company's main offices in: Ivrea, Rho, Marghera, Rome and Pozzuoli.

At the end of 2021, **the company's fleet**, including those in car-pooling, **had a total of 80⁷¹ electric or hybrid cars. 17 charging stations** for electric or plug-in hybrid cars are available at the Rome Viola headquarter and 8 at the Milano headquarter.



⁷¹ Total company car fleet at 31 December 2021: 1,399

SMART TECHNOLOGIES FOR THE ENVIRONMENT



- What it means to us
- Why it's important
- Our goals
- Solutions for smart cities
- Beyond 5G Trial: future and innovation
- Electromagnetic emissions
- Partnership with Italgas
- Greener shops
- Close the circle
- VERY MOBILE: Green SIM cards and refurbished mobile phones
- WINDTRE electricity and gas powered by Acea Energia

WHAT IT MEANS TO US



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



Supporting the use of blockchain and IoT to optimise urban mobility



Digitising the processes within the stores



Stimulating discussion on the impact of technologies on the environment and on Smart Cities

WHY IT'S IMPORTANT

Smart technologies have a high potential in terms of social, economic and environmental impact. **The digital transition and green transition are two challenges that now go hand-in-hand**, bound by a common thread: this is the so-called Twin Transition, the two pillars that form the basis for decarbonisation.

In fact, digitisation has the potential to facilitate the reduction of greenhouse gas emissions in various sectors, and to improve adaptation to climate change, while **the effective use of digital technologies can help dissociate growth from the use of resources**, thus strengthening circular business models⁷².

By 2050, 70% of the world's population will be concentrated within cities⁷³, where approximately 2/3 of all energy is consumed each year, and where over 70% of the world's greenhouse gas emissions are generated⁷⁴. The digitisation of cities will therefore play a fundamental role in resolving the problems associated with increasing urbanisation, and will contribute to the decarbonisation process. These considerations have given rise to the **smart city** concept: a city model that makes use of connected and integrated technological solutions and systems capable of offering innovative solutions for smart and sustainable city management. **The advent of 5G and the improvement of the networks and infrastructures are a fundamental part of this process.**

In fact, at least 40% of the European solutions adopted to reduce emissions by 2030 are based on mobile and fixed connectivity.

These solutions could help reduce CO2 emissions by 55 to 170 million tonnes per year⁷⁵.

⁷² European Council: Council conclusions on Digitalisation for the Benefit of the Environment, 2020

⁷³ The World Bank: Urban Development, 2020

⁷⁴ IEA: Empowering Cities for a Net Zero Future, 2021

⁷⁵ Ericsson: Connectivity and Climate Change, 2021



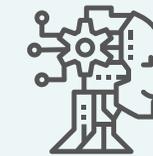
2050

Year by which 70% of the world's population will be concentrated within cities, where approximately 2/3 of all energy is consumed each year

350 million 

Le tonnellate di CO₂ risparmiate nel mondo entro il 2050 grazie alla digitalizzazione e al controllo intelligente degli edifici

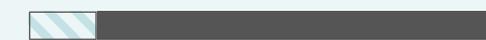
(International Environmental Agency, 2021)



\$ 90 billion

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

(Ellen McArthur Foundation, 2019)



86%

The percentage of Italians who believe that Artificial Intelligence has a fundamental impact in the fight against climate change

(Ipsos, 2021)

OUR GOALS

SMART PARTNER OF 100 SMART CITIES - BY 2030



LUCA MONTI
Sustainability Ambassador
Head of Innovative Concept Development & Scaling

"We want to support local authorities in transitioning their municipalities into smart and sustainable cities"

COURSES OF ACTION

Screening of the relevant cities and identification of their needs

Identification of possible solutions and verification via a technical and economic feasibility test (POC - Proof Of Concept)

Co-funding of POCs/ showcasing of Smart City digital solutions to support cities in their digital transformation

Contact with local PAs, round tables with Consumer Associations and PAs, participation in local innovation hubs, like the Casa delle Tecnologie Emergenti ("House of Emerging Technologies" - CTEs), and sponsorship of relevant events

Educational programme to help the PA implement new skills and technologies like 5G, Data Science and Cloud

WHERE WE ARE AT

Development of innovative services: Easy Wi-Fly and Smart school for the creation of digital and interconnected schools; big data Analytics for transport, tourism, and business: the web dashboard created for those involved in the planning, management and analysis of urban mobility, tourism and business

Support for the CTEs in l'Aquila and Rome

Agreement signed with the municipality of Rome to support the creation of an Open Tech Lab at the Tiburtina Train Station where companies, startups, research bodies, universities and public administration can meet and experiment innovative services useful for citizens and businesses from a smart city perspective

Development of the memorandum of understanding model with the municipalities

SOLUTIONS FOR SMART CITIES

Aware of the impact that technologies can have for the promotion of Smart cities, in 2021 WINDTRE shored up its **B2G (business-to-Government) proposition to provide a concrete response to the growing demand for urban recovery and resilience solutions**, with a particular focus on schools and planning projects aimed at improving transport, tourism and retail services.

WINDTRE thus bolstered its portfolio of services in partnership with innovative ICT companies:

- 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**. In addition, it is also possible to quickly create and modify the database of users with access to the various types of communications; information campaigns, with text messages/emails or push notifications being sent out for specific or recurring events; services for teachers and students, such as tutorials and online tools, and access to e-books and Web pages with certified content, available on any type of device (Smartphones, Tablets, PCs, Laptops, etc.).



- **Big Data Analytics for transport, tourism, and business:** the web dashboard designed for those involved in planning, management and analysis for urban mobility, tourism or business, which is capable of analysing people's movements in specific areas of interest in a simple and effective way, based on anonymous data from millions of customers and processed by sophisticated algorithms created ad hoc.

BEYOND 5G TRIAL: FUTURE AND INNOVATION



During 2021, WINDTRE followed up on its commitment to promoting technological research and dissemination activities by renewing its partnership with ZTE: a Chinese leader in the fields of telecommunications and 5G technology, with particular regard to the use of the ZTE Innovation & Research Centre (ZIRC).

As part of the Tecnopolo d'Abruzzo technology hub, the ZIRC laboratory hosted the 5G experimentation, and intends to promote future innovative projects for the city of L'Aquila, such as the SICURA project associated with the Ministry of Economic Development's *Casa delle Tecnologie Emergenti* (CTE) tender, and the EXTENSION project associated with the ESA cultural tender.

Once again within the context of the Ministry of Economic Development's Casa delle Tecnologie Emergenti tender, WINDTRE entered into a corporate partnership **agreement with the City of Rome**. The aim of the partnership is to support the creation of an Open Tech Lab at the Tiburtina Train Station in order to **facilitate collaboration between companies, startups, research bodies, Universities and Public Administrations, and to experiment with innovative services** that will be useful to citizens and local businesses from a smart city perspective.

WINDTRE challenged the Open Tech Lab's participants to come up with a way to **combine 5G technology with Blockchain, IOT and Artificial Intelligence functionality** to generate services aimed at improving mobility throughout the city. One of the possible areas where these technologies could be applied is in the development and implementation of new transport ticket management models, such as pay-per-use models associated with the routes actually travelled, and new digital payment models that can even be linked to the use of mobile phone credit. All the routes on city lines covered by 5G can be easily calculated, even with the aid of optimisation algorithms if necessary, and integration with digital payment systems will allow the use of paper tickets to be eliminated, thus ensuring considerable energy savings.

WINDTRE participated in the **Federated Innovation@MIND** programme (a **public/private partnership model** conceived at MIND - the new innovation district established at the former EXPO site in Milan), where it collaborated with other well-known partners to **create a classroom of the future**, in order to show how the use of digital technologies and the IoT, together with new teaching practices, can help make schools more resilient and can bridge the gaps of the digital divide for less fortunate parts of the country. The programme offers the opportunity to help improve communication and collaboration between students and teachers, and to monitor environmental quality parameters.

Through Asstel (a Confindustria trade association), WINDTRE promoted the **Smart School project, which proposes a single comprehensive solution** to meet the needs of students, teachers, school managers, families, the Ministry of Education, Universities and Research Institutes alike, **for a digital school** model that provides users with a simple, economic, and efficient tool.



ELECTROMAGNETIC EMISSIONS

WINDTRE **constantly and attentively monitors its plants to ensure that they generate electromagnetic emissions below the stringent limits** set by the Italian legislation (an average daily value of 6 V/m in heavily frequented areas).

The checks carried out for both the new and existing plants entails the preventive monitoring of the electromagnetic emissions. Once the authorisations have been acquired from the competent bodies (ARPA, Municipality, Superintendencies, etc.), WINDTRE checks the meters with constant attention to ensure that the equipment does not exceed the power and emission levels established for the area of reference.

As of 2015, WINDTRE **publishes on the websites of the regional ARPAs the monitoring data** of its installations to which the regulation of 02/12/2014⁷⁶, which requires the verification of the hourly and daily average power, applies.

Concerns about the impacts of electromagnetism, especially after the advent of 5G, have been increasing among the public. For this reason, thanks to the support of the trade association **ASSTEL - Assotelecomunicazioni**, the company promotes the **in-depth analysis of these issues and participates in the study and research initiatives necessary to closely monitor the impact of its network** and transparently guarantee the highest levels of safety for the territories and their inhabitants.

⁷⁶ 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).



2015

The year from which WINDTRE publishes, on the websites of the regional ARPAs, the monitoring data of electromagnetic emissions

PARTNERSHIP WITH ITALGAS

WINDTRE has launched a partnership with Italy's leading gas distributor, Italgas, to support the digitisation of its entire gas network, by leveraging the company's NB-IoT skills. The custom solution developed provides for a SIM/IoT connection, a private APN, and a Cisco/Jasper management platform, in order to allow for the secure transmission of data from the Italgas network to the data centres.

This system has allowed Italgas to monitor its network operations in real time, manage alarms, carry out big data analyses, and perform predictive maintenance. It has also enabled the remote reading of gas consumption, in order to reduce the need for Italgas personnel to travel and take the readings in person.

This has resulted in increased operational efficiency, and has simultaneously reduced the amount of fuel needed for travel purposes.



[BACK TO SUMMARY](#)

GREENER SHOPS

WINDTRE has undertaken the task of **restyling its shops in order to render their day-to-day activities more sustainable.**

In 2021, the shops were outfitted with a new type of **LED lighting**, as well as a platform that monitors 15 parameters for each shop, in order to improve the quality of the air and the efficiency of the air exchange systems. The sustainable transition continued with the introduction of a new electronic signature system (**OTP: One Time Password**), **which eliminated the need to print contracts**, the testing of a **SMART SCANNER** document verification system, **which will eliminate the need to photocopy customer documents** and retain a hard copy of their contracts, and the completion of the digital signage infrastructure at all the single-brand stores, resulting in a considerable reduction in paper consumption.

In 2021 the employees were also provided with new **eco-sustainable uniforms** made according to the OEKO-TEX Standard 100 criteria, a certification that attests to the quality of the materials utilised, and the eco-compatibility of the production process.



CLOSE THE CIRCLE

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

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

Moreover, in over 40% of cases WINDTRE replaces non-functioning modems with pre-owned products that have been refurbished by specialised companies, thus allowing fixed network customers to obtain perfectly functional products, while at the same time limiting the production of electronic waste.

Similarly, a kasko service is provided for mobile business customers, which, in over 80% of cases, allows them to replace their faulty smartphone with a refurbished one. In both cases, the faulty product exchanged can often be subsequently reconditioned and reutilised as a new replacement.

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

These services are offered via the business partner Bolltech device protection (Italy) S.r.l., and, for a small monthly fee, allow customers to replace their Smartphones with new or refurbished grade A models (i.e. semi-new or like new), with delivery in 1 just business day in major cities (Rome, Milan, Naples, Turin, Genoa, Bologna, Florence and Bari).



40%

In over 40% of cases WINDTRE replaces non-functioning modems with pre-owned products that have been refurbished by specialised companies

VERY MOBILE: GREEN SIM CARDS AND REFURBISHED MOBILE PHONES

Very Mobile, a brand owned by CK Hutchison Holdings Ltd. group (to which Wind Tre S.p.A. also belongs), has always been attentive to environmental issues, and in October of 2021 became the first semi-virtual operator to launch an eco-sustainable SIM card on the market, which is available to those who purchase online, in stores, and via the 1929 customer service number.

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 emissions. In fact, the plastic with which this new Very Mobile SIM card is made comes from the polystyrene recovered from refrigerators disposed of by consumers, or rather the white plastic contained inside them, which is transformed into raw material and used to make the “finished” SIM card. A low-impact form of recycling, in the name of sustainability. Afterwards, the WINDTRE brand also adopted the eco-sim starting from the first months of 2022.

Awareness of ‘green’ issues is in Very brand’s DNA: in fact, on 14 February 2022 it also began selling refurbished smartphones on its website, in partnership with the Austrian company *refurbed*™. In addition to being convenient and eco-sustainable, **refurbished smartphones** also provide for considerable savings in terms of both money and CO2 emissions; moreover, with each smartphone purchased, the customer receives an **eco-friendly cover** free of charge, and tree is planted in Madagascar, Haiti, Nepal, Mozambique, Kenya or Indonesia.

These concrete initiatives constitute the continuation of an environmental awareness journey that Very Mobile had already initiated through other activities, including the creation of the *verycreativi.it* website, which allows anyone to express themselves creatively without marking up the walls of the city, the cleaning of Schuster Park in Rome, in collaboration with Legambiente, and the development

of a poster capable of purifying the air thanks to a special fabric, which was installed in Genoa in December 2020. Very Mobile was also the first semi-virtual operator to have launched eSIMs, which allow users to activate service plans without having to physically insert SIM cards into their smartphones.

WINDTRE ELECTRICITY AND GAS POWERED BY ACEA ENERGIA

During the second half of 2021, WIND TRE and ACEA Energia launched a partnership covering 12 Italian regions, which was extended to cover the entire country at the beginning of 2022, whereby nearly 3,000 WINDTRE points of sale would promote and market the gas and electricity plan “WINDTRE LUCE & GAS Powered by ACEA Energia”.

The goal is to take advantage of WINDTRE reliability and quality together to the wide-reaching sales network and Acea Energia’s consolidated experience, acting as a technical supplier, to propose a plan that’s open to everyone, based on the principles of transparency and proximity, while at the same time ensuring an eco-sustainable approach thanks to the **Electricity which is 100% certified by a Guarantee of Origin**, i.e. by the electronic certification attesting to the renewable origin of the sources used for the production of electricity, **and to the GAS with compensation of CO₂** emissions obtained through the purchase of credits carbon certificates. What’s more, WINDTRE customers are even offered and exclusive advantage.



THE ORIGINS OF THIS REPORT

The Sustainability Report demonstrates, year after year, WINDTRE'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 2021 financial year (1 January - 31 December), and is compared to the relative 2020, 2019, 2018 and 2017 information, wherever possible. Economic and financial data and key indicators are in line with the reporting package the company provides to its shareholder [GRI 102-45 and GRI 102-50].

This document has been drawn up in accordance with the Core option of the 2016 Global Reporting Initiative (GRI) Standards, which are the most widely used international standards for sustainability reporting today [GRI 102-54]. 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 2016 GRI Standards, the 2021 edition of WINDTRE's ESG Report is centred around the 7 material topic identified through the materiality analysis: a process that establishes a threshold beyond which a topic becomes considered relevant enough to be reported. In particular, the GRI defines material topics as topics useful for representing the economic, environmental and social impacts generated by the organisation and, therefore, capable of impacting its decisions and those of its stakeholders.

The GRI Content Index lists the material topics covered in this document and their relationship to specific aspects of the GRI Standards.

The contents of the Sustainability Report were obtained through a collective effort, in which all the WINDTRE departments participated, with each gathering the most relevant information relating to its activities and establishing a complete and accurate information flow, which guaranteed the reliability of the reporting model adopted. The External Affairs & Sustainability Department coordinated the project, thus ensuring consistent results.

The index of the GRI disclosures reported can be found at the end of this document. The Sustainability Report is available on our website www.windtregroup.it. For any further information or clarifications you may require, please contact the WINDTRE External Affairs & Sustainability Department at the following addresses [GRI 102-53]:

WINDTRE S.p.A.

L.go Metropolitana, 5 - 20017 Milano-Rho
Via Cesare Giulio Viola, 48 - 00148 Roma

External Affairs & Sustainability

sustainability@windtre.it

General information																							
General information	Description	Chapter/section																					
Organisation profile																							
102-1	Organisation name	WINDTRE S.p.A.																					
102-2	Business, brands, products and services	Much closer for a more sustainable future (p. 34)																					
102-3	Location of headquarters	The Group's registered offices and main operational headquarters are located at no. 5 Largo Metro, Rho (MI) Italy. The company also has another large operational facility at no. 48 Via Cesare Giulio Viola, Rome, Italy																					
102-4	Location of operations	The company operates in Italy																					
102-5	Ownership and legal form	<p>The share capital of Wind Tre S.p.A., amounting to €474,303,795, fully paid-up, is 100% owned by Wind Tre Italia S.p.A., which in turn is wholly owned (100%) by VIP-CKH Luxembourg S.à r.l. WINDTRE, in turn, wholly owns the companies S.p.A., Wind Retail S.r.l., 3Lettronica Industriale, while it has some minority interests in other companies.</p> <table border="1"> <thead> <tr> <th>WINDTRE subsidiaries and affiliates as at 31.12.2021</th> <th>Company/ Consortia registered offices</th> <th>Percentage of share capital/consortium fund held by WINDTRE</th> </tr> </thead> <tbody> <tr> <td>3Lettronica Industriale S.p.A.</td> <td>Italy</td> <td>100%</td> </tr> <tr> <td>WIND Retail S.r.l.</td> <td>Italy</td> <td>100%</td> </tr> <tr> <td>Mix s.r.l.</td> <td>Italy</td> <td>9,75%</td> </tr> <tr> <td>CONSEL - Consorzio ELIS a r. l.</td> <td>Italy</td> <td>1%</td> </tr> <tr> <td>Janna S.c.ar.l.</td> <td>Italy</td> <td>17%</td> </tr> <tr> <td>CAMPANIA DIGITAL INNOVATION HUB - RETE CONFINDUSTRIA SCARL</td> <td>Italy</td> <td>10%</td> </tr> </tbody> </table>	WINDTRE subsidiaries and affiliates as at 31.12.2021	Company/ Consortia registered offices	Percentage of share capital/consortium fund held by WINDTRE	3Lettronica Industriale S.p.A.	Italy	100%	WIND Retail S.r.l.	Italy	100%	Mix s.r.l.	Italy	9,75%	CONSEL - Consorzio ELIS a r. l.	Italy	1%	Janna S.c.ar.l.	Italy	17%	CAMPANIA DIGITAL INNOVATION HUB - RETE CONFINDUSTRIA SCARL	Italy	10%
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CAMPANIA DIGITAL INNOVATION HUB - RETE CONFINDUSTRIA SCARL	Italy	10%																					
102-6	Markets served	About us (p.34)																					
102-7	Scale of the organisation	At 31 December 2021 the total number of employees was 6,693; the the mobile market share was 26.5% for Human SIM (AGCom report no.1 / 2022); revenues amounted to € 4.6 billion; investments in 2021 was equal to 1.3 billion euros; network coverage was equal to over 99% of the population																					

General information		
General information	Description	Chapter/section
102-8	Information on employees and other workers	Much closer for a more sustainable future (p. 176) The personnel data for 2021 refer to the companies WINDTRE S.p.A., WINDTRE Italia S.p.A., WINDTRE Retail S.r.l, different from the perimeter of previous years which also included 3Lettronica Industriale S.p.A and CKHNI. Since WINDTRE's activities are not seasonal, the characteristics of the company population do not undergo any changes during the year[GRI 102-8e]. Non-employees, who constitute a small minority compared to the total, are mainly consultants in charge of sales in the stores of the WINDTRE Retail brand [GRI 102-8d]. From the point of view of the breakdown by contractual level, the consistency of the staff remains in line with previous years. WINDTRE S.p.A operates exclusively in Italy.
102-9	Supply chain	Business ethic and integrity (p.95)
102-10	Significant changes to the organisation and its supply chain	There are no significant changes compared to the previous edition
102-11	Precautionary principle	The precautionary principle is an integral part of ethical principles and managerial directives and is monitored as part of the Integrated Management System (Total Quality Management) which ensures prompt identification of risks and the adoption of appropriate preventive measures.
102-12	External initiatives	WINDTRE promotes numerous external initiatives also in collaboration with other realities. For a complete view, see the sections of the document: Much greener, Much more Responsibility, Much more Humanity.
102-13	Membership of associations	<ul style="list-style-type: none"> ASSTEL, the Confindustria organisation that represents telecommunications companies; CONSEL, the ELIS Consortium for higher professional training, whose primary goal is to support young people in their transition to the world of employment.
Strategy		
102-14	Statement from senior decision-maker	Letter to stakeholders (p.4)
102-15	Key impacts, risks, and opportunities	Scenario (p. 20)

General information		
General information	Description	Chapter/section
Ethics and integrity		
102-16	Values, principles, standards, and rules of conduct	Business ethics and integrity - Governance instruments and management systems (p. 90)
102-17	Mechanisms for advice and concerns about ethics	Business ethics and integrity - Whistleblowing (p.96)
Governance		
102-18	Governance structure	<p>Wind Tre S.p.A. Board of Directors consists of six members: Fok Kin Ning Canning (Chairman); Jeffrey Alan Hedberg (Chief Executive Officer); Christian Nicolas Roger Salbaing (Board Member); Frank John Sixt (Board Member); Edith Shih (Board Member); Stefano Invernizzi (Board Member).</p> <p>The Chairman of the Board of Directors is vested with the powers provided by law and the Company's Articles of Association with regard to the authority to represent the company and the functioning of its governing bodies. No Executive Committees have been set up pursuant to art. 2381 of the Civil Code.</p> <p>The Wind Tre S.p.A. Board of Statutory Auditors, or rather the company's internal management control body, consists of 3 standing auditors and 2 alternate auditors: Marcello Romano - Chairman of the Board of Statutory Auditors; Roberto Colussi - Standing auditor; Luca Occhetta - Standing auditor; Fabio Carusi - Alternate Auditor; Giuseppe Tarantino - Alternate auditor. The selection of the members of the Board of Directors and the Board of Statutory Auditors is carried out with the approval of the ultimate shareholder CK Hutchison Holdings Ltd, in accordance with the Group's rules of corporate governance. With regard to the Board of Directors, the general meetings has not resolved any form of compensation.</p>
102-23	Chair of the highest governance body	Fok Kin Ning Canning
102-29	Identification and management of the economic, environmental and social impacts	'Much closer for a more sustainable future (p. 54)

General information		
General information	Description	Chapter/section
Stakeholder engagement		
102-40	List of stakeholder groups	Appendix: Our stakeholder
102-41	Collective bargaining agreements	All of the company's employees are subject to a collective labour contract negotiated with the union organisations
102-42	Identifying and selecting stakeholders	Appendix: Our stakeholder
102-43	Approach to stakeholder engagement	Appendix: Our stakeholder
102-44	Key topics and concerns raised	Appendix: The issues that matter
Reporting practices		
102-45	Entities included in the consolidated financial statements	WIND TRE Italia S.p.a - WINDTRE S.p.A. - Wind Tre Retail S.r.l. - 3Lettronica Industriale S.p.A.
102-46	Defining report content and topic boundaries	Appendix: Issues more relevant
102-47	List of material issues	Appendix: Issues more relevant
102-48	Restatements of information	There are no significant changes compared to the previous edition
102-49	Changes in reporting	There are no significant changes compared to the previous edition
102-50	Reporting period	January 1 2021 - December 31 2021
102-51	Date of the most recent report	June 2021
102-52	Reporting cycle	Annual
102-53	Contact point for questions regarding the report	For any further information or clarifications, you may require, please contact the WINDTRE External Affairs & Sustainability Department at the following e-mail address: sustainability@windtre.it
102-54	Claims of reporting in accordance with the GRI Standards	The origins of this report (p. 218)
102-55	GRI content index	GRI index
102-56	External assurance	The 2021 Sustainability Report was subjected to external verification by a Third Party

Specific standards		
Information	Description	Chapter/section
Decarbonisation		
GRI 103: Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Decarbonisation (p. 188ss.)
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
GRI 203: Indirect Economic Impacts 2016		
203-1	Infrastructure investments and services supported	Decarbonisation (p. 188ss.)
GRI 302: Energia 2016; GRI 305: Emissioni 2016		
302-1	Energy consumed within the organisation	Decarbonisation - Zero emissions goal to 2030 (p. 195)
305-1	Direct (Scope 1) GHG emissions	Decarbonisation - Zero emissions goal to 2030 (p. 195)
305-2	Energy indirect (Scope 2) GHG emissions	Decarbonisation - Zero emissions goal to 2030 (p. 195)
Smart technologies for the environment and healthcare		
GRI 103: Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Smart technologies for the environment (p. 204ss.)
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
GRI 203: Indirect Economic Impacts 2016		
203-1	Infrastructure investments and services supported	Smart technologies for the environment (p. 204ss.)
203-2a	Examples of significant indirect economic impacts, positive and negative, identified by the organisation	Smart technologies for the environment (p. 204ss.)
Lifelong digital learning		
GRI 103: Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Lifelong digital learning (p. 156ss.)
103-2	The management approach and its components	
103-3	Evaluation of the management approach	

Specific standards		
Information	Description	Chapter/section
GRI 203: Indirect Economic Impacts 2016		
203-1	Infrastructure investments and services supported	Lifelong digital learning (p. 156ss.)
Digital divide		
GRI 103: Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Digital Divide (p.118ss.)
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
GRI 203: Indirect Economic Impacts 2016		
203-1	Infrastructure investments and services supported	Digital Divide (p.118ss.)
Inclusion of people with disabilities		
GRI 103: Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Inclusion of people with disabilities (p. 140ss.)
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
GRI 203: Indirect Economic Impacts 2016		
203-1	Infrastructure investments and services supported	Inclusion of people with disabilities (p. 140ss.)
Cybersecurity and privacy		
GRI 103: Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Cybersecurity and privacy (p. 72ss.)
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
Child protection in the digital domain		
GRI 103: Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Child protection in the digital domain (p. 64ss.)
103-2	The management approach and its components	
103-3	Evaluation of the management approach	

Specific standards		
Information	Description	Chapter/section
GRI 203: Indirect Economic Impacts 2016		
203-2a	Examples of significant indirect economic impacts, positive and negative, identified by the organisation	Child protection in the digital domain (p. 64ss.)
GRI 418: Customers privacy 2016		
418-1b	Total number of leaks, thefts, or loss of customer data detected	Cybersecurity and privacy - Data protection (p. 85)
Close to our customers		
GRI 103: Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Closer to our customers (p. 98ss)
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
GRI 417: Marketing and labelling 2016		
417-3	Incidents of non-compliance concerning marketing communications	Closer to our customers - Clarity and transparency in commercial communications (p. 113)
Close to our people		
GRI 103: Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Closer to our people (p. 170ss.)
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
GRI 401: Employment 2016; GRI 403: Occupational Health & Safety 2016; GRI 404: Training and Education 2016		
401-1	New employee hires and employee turnover	Closer to our People - The WINDTRE Team (p. 174)
403-5	Employee training on safety issues	Lifelong digital learning - Continuous skill development (p. 165)
404-1	Average training hours per employee	Lifelong digital learning - Continuous skill development (p. 165)
404-2	Programs for upgrading employee skills and transition assistance programs	Lifelong digital learning - Continuous skill development (p. 164)
405-1	Diversity in governance bodies and among employees	Closer to our People - The WINDTRE Team (p. 174)

Specific standards		
Information	Description	Chapter/section
Ethics and business integrity		
GRI 103: Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Ethics and business integrity (p. 86ss.)
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
GRI 207 - Taxes 2019		
207-1	Approach to the tax system	The approach to the tax system falls under the material topic Ethics and integrity in business. The responsibility for the management of tax matters is in charge of the tax function, which reports to the Finance, Control & Procurement department. The Tax Strategy represents the approach defined by the Board of Directors in managing tax issues. The tax approach is aligned with the business strategies that make the sustainable development goals their own through the ESG Plan.
GRI 308: Environmental assessment of suppliers 2016		
308-1	New suppliers that have been evaluated using environmental criteria	Business ethics and integrity - A responsible supply chain (p. 95)
GRI 414: Social assessment of suppliers 206		
414-1	New suppliers that have been evaluated using social criteria	Business ethics and integrity - A responsible supply chain (p. 95)

OUR STAKEHOLDERS AND THE MOST RELEVANT ISSUES

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

The stakeholders are those who have legitimate expectations from WINDTRE or can have an impact on the company’s operations.

The table at the following page shows WINDTRE’s stakeholders grouped into categories.

The company maintains regular relationships and dialogues with its stakeholders. The contacts take place in different ways, and at different frequencies, depending on the categories concerned, but for all the categories, they occur several times in the course of a fiscal year. Furthermore, some initiatives are organized specifically in view of the ESG Report and the Integrated Management System.

In 2020, a structured process of listening to stakeholders was launched from WINDTRE, involving them directly in the construction of scenarios and solutions to outline the ESG Plan to 2030 and contribute to the achievement of the goals of the Global Agenda.

This process ended in February 2021. The choice of stakeholder representatives to be involved in this case took place starting from the importance of the organization as an interlocutor of WINDTRE, and the representativeness of the selected person, with respect to this organization. Most of the discussion and dialogue, however, falls within the scope of the customary practices of discussion and cooperation, regardless of the reporting activities.

The following table shows the regular interactions with stakeholders conducted in 2021, and the topics that are most important to each stakeholder category. The stakeholders to be engaged in the initiatives were selected based on their importance to the activities performed by the company.

OUR STAKEHOLDERS



Stakeholders	Topics of greatest interest	Main initiatives for dialogue and engagement
Environment <ul style="list-style-type: none"> Ecosystem Ministry of the Environment Environmental Associations Specialised agencies (e.g. ARPA, APAT) 	Reductions of CO2 emission Energy savings Consumption of clean and renewable energy	WINDTRE in partnership with WWF Italia for the assessment of CO2 emissions and for energy saving initiatives GenerAzione Mare

Stakeholders	Topics of greatest interest	Main initiatives for dialogue and engagement
Shareholders and bondholders <ul style="list-style-type: none"> CK Hutchison Ltd and its Management 	Economic results Corporate governance Market trends Corporate strategy Risk Management	Shareholder meetings Periodic conference calls and meetings with investors Ad hoc meetings at conferences organised by banks or other institutions Group ESG data collection Biannual risk assessment
Customers and Consumer Associations <ul style="list-style-type: none"> Consumer and MicroBusiness Customers Business Customers Public Administration Consumer Associations 	Customer satisfaction Transparency and responsible marketing Privacy and data security Network reliability and coverage On line security for young people Digital inclusion Technological innovation for the new generations	Customer satisfaction analysis Customer care and other dialogue initiative with Consumer Associations Social networks Contact Center
The Public <ul style="list-style-type: none"> Territorial and local communities Tertiary Sector (no-profits, NGOs, etc.) Universities and Research Institutes Media and opinion leaders 	Privacy and data security Innovation and open innovation Support of solidarity initiatives Local investments Transparency	Neoconnessi and Neoconnessi Silver Charity Hub Insieme si può Solidarity collection Race for the Cure Cartella sospesa
Suppliers and commercial partners <ul style="list-style-type: none"> Suppliers of goods and products Suppliers of services Sub-suppliers of goods and products Direct and indirect sales network 	Compliance with the contractual commitments Continuity of the relationship Innovation and open innovation	WINDTRE Convention Supplier's audit Ethical risk assessment of suppliers Privacy compliance checks Partnership initiatives
Institutions <ul style="list-style-type: none"> Regular authorities (Privacy, Antitrust, etc.) National and local government institutions (Ministry of Communications, Local authorities, etc.) Judicial and Prosecutorial Offices Bodies of the Judicial Authorities (Police Forces) Civil Protection Authority 	Network reliability and coverage Privacy and data security Legal compliance	Ongoing dialogue with local, domestic and European institutions on all issues relating to TLC and digital innovation Specific working round-tables Borghi connessi goal
WINDTRE's People <ul style="list-style-type: none"> Employees External collaborators Union Representatives and Organisations 	Economic results Skill assessment Work/private life balance Equal opportunities Workplace health and safety Transparency	Corporate community Events Pathways for the engagement of new talents Engagement Survey Training Whistleblowing

MOST RELEVANT ISSUES

The issues that were determined to be the most relevant for the company and its stakeholders are shown in the following table [GRI 102-46]:

Work areas	Issue	Description	Corresponding GRI standards aspect
More Responsibility	Child protection in the digital domain	Providing younger users with the tools needed to recognise and protect themselves against abuse, false information or violence, in order to avoid harmful situations and online threats in general	203-indirect economic impacts
	Cybersecurity and privacy	Ensuring maximum data protection by investing in a cybersecurity infrastructure and protecting this data asset to safeguard customers' Privacy and sensitive data, and ensuring compliance with the latest provisions of the General Data Protection Regulation at all times.	203-indirect economic impacts
	Ethics and business integrity	Carefully evaluate the entire supply chain and the partners with whom it collaborates to ensure transparency of the activities and develop a solid corporate governance structure to protect the rights and interests of investors and all stakeholders.	308-1 new suppliers that have been evaluated using environmental criteria; 414-1 new suppliers that have been evaluated using social criteria
	Close to our customers	Offer an excellent customer experience to enhance the relationship with customers in the name of reliability and transparency, constantly improving the service offered, thanks to dialogue with customers and consumer associations and listening to their needs.	417-3 incidents of non-compliance concerning marketing communications

Work areas	Issue	Description	Corresponding GRI standards aspect
More Humanity	Digital divide	Reducing, and even closing, the digital divide, and continuing efforts to bring digital technologies everywhere, ensuring the development of an inclusive, accessible and affordable network, benefiting those segments of the population excluded for sociodemographic and/or economic reasons, such as those living in disadvantaged or remote areas, small businesses far from markets, the elderly, those in financial difficulties or who do not have access to home or mobile connectivity.	203-indirect economic impacts
	Lifelong digital learning	Helping young people and their families face the challenges posed by an increasingly digital and in-person hybrid education. Promoting lifelong digital learning among young people. Preparing WINDTRE's personnel to face the challenges of the future. Supporting training programmes for skill improvement and development. Identifying and nurturing young talents.	203-indirect economic impacts
	Close to our people	Promote work-life balance, diversity and equal opportunities, establishing an open dialogue with their employees to constantly monitor their needs and improve their well-being.	401-1 new employee hires and employee turnover; 403-5 employee training on safety issues; 405-1 diversity in governance bodies and among employees
	Inclusion of people with disabilities	Listening and promptly responding to the needs of people with disabilities, even through dialogue with the relevant associations and non-profit organisations. Offering people with disabilities a work environment that's tailored to their needs. Making our digital channels accessible to everyone	203-indirect economic impacts
	More Green	Decarbonisation	Making an active commitment to reducing the CO2 emissions generated by the activities, facilities and services offered
Smart technologies for the environment		Facilitate the research and the creation of network infrastructures that support the diffusion of innovative technologies, intercepting the opportunities for contamination with other sectors, including Health Care and sectors with high environmental impact, where smart technologies can help reduce energy consumption and hence CO2 emissions as well as digitizing processes that would otherwise require a high consumption of resources.	203-indirect economic impacts

CALCULATION CRITERIA

Electric energy consumption

The electricity consumption data include an estimate of the consumption data attributable to WINDTRE for the sites shared with other service providers. This calculation includes an estimate of the consumption attributable to the companies Galata S.p.A. and CKHNI (now Cellnex) for services offered to WINDTRE with its own equipment (operational criteria). Direct electricity consumption linked to diesel consumption (generators) has been estimated by calculating the litres of diesel consumed in the reference year, multiplied by the kWh/litre conversion coefficient proposed by the Green House Gas Protocol.

Conversion factors utilised [GRI 302-1 g]:

- Litre of diesel/kWh: 10.63
- Cubic metre of natural gas/kWh: 11.01
- kWh/GJ: 0,0036

Greenhouse gas emissions

Since the consolidation approach for Scope 1 and Scope 2 emissions is the same as the financial and operational control, all the emissions of the subsidiaries are attributed to WINDTRE [GRI 305-1f, 305-2f].

The calculation of the Scope 1 (direct) emissions includes the emissions from the company's direct energy consumption. In particular:

- Direct fuel consumption: Petrol, Diesel, LPG, Natural Gas, and Biofuel (consumption related to generators, heating, canteen stoves, and the company's proprietary fleet of vehicles)
- Release of refrigerant gases: (refills of air conditioners/cold stores)

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

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

- GWP utilised for CH₄ is equal to 21, while for N₂O it is equal to 310. [GRI 305-1, 305-2]
- For the calculation of indirect greenhouse gas emissions from fuel, the emission factors required by the Green House Gas Protocol were utilised (kg of CO₂ equivalent emitted in relation to the volume of fuel consumed)

For the calculation of indirect emissions from electricity, the conversion factors derive from Table 2.4 of the ISPRA publication - Emission factors for the production and consumption of electricity in Italy, 2020. The emission coefficient of electricity consumption is determined by the percentages of generation of the Italian electricity fleet over the years. In particular, for 2019 -2021 period, an emission factor (gCO₂ emitted per kWh utilised) of 276.3 gCO₂/kWh was utilised; for the years 2017 and 2018, reference was made to the same source: ISPRA - Emission factors for the generation and consumption of electricity in Italy, 2020.

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

Description	Units of measurement	Conversion factor CO ₂				
		2021	2020	2019	2018	2017
Electrical consumption	g CO ₂ /kWh	276,3	276,3	276,3	281,4	308,1
Diesel, heating, generation, haulage	g CO ₂ /Litro	2,65	2,65	2,65	2,65	2,65
Natural gas, heating and haulage	t CO ₂ / Stdm ³ *10 ³	1,972	1,972	1,972	1,972	1,972
Petrol	g CO ₂ /Litro	2,38	2,38	2,38	94%	2,38



ASSURANCE STATEMENT ADDRESSED TO WIND TRE S.P.A.

1. INTRODUCTION

WIND TRE S.p.A. (“WIND TRE”) has commissioned Bureau Veritas Italia S.p.A. (“Bureau Veritas”) an independent assurance of its 2021 Sustainability Report, for the purpose of providing findings over:

- the accuracy and quality of published information concerning its sustainability performance;
- the correct application of those reporting principles outlined in the 2021 Report, in particular Global Reporting Initiative Sustainability Reporting Standards (GRI Standards).

2. RESPONSIBILITY, METHODOLOGY AND LIMITATIONS

WIND TRE alone had the responsibility of collecting, analyzing, collating and presenting information and data included in its 2021 Sustainability Report. Bureau Veritas responsibility has been to perform an independent assurance against defined objectives and to reach the conclusions reported in this Statement.

The assurance performed has been a Limited Assurance in accordance to the ISAE 3000 standard, through sample application of audit techniques, including:

- review of WIND TRE’s policy, mission, values, commitments;
- review of records, data, procedures and information-gathering systems;
- interviews to members of the working group responsible for drafting the 2021 Sustainability Report;
- interviews to company representatives from various functions and levels;
- overall verification of information and general content of the 2021 Sustainability Report.

The assurance activities have been performed both remotely, by video conference, and at the company’s site in Via Cesare Giulio Viola n.48, Rome. We believe we have obtained sufficient and adequate evidence to support our conclusions.

The assurance has covered the whole 2021 Sustainability Report, with the following limitations: for activities outside the reference period (1 January 2021 – 31 December 2021) and for statements of policy, intent and objective, Bureau Veritas verified their consistency against the outlined reporting methodology.

3. CONCLUSIONS

Following the assurance activities described above, nothing has come to our attention to indicate that information and data in the 2021 Sustainability Report are inaccurate, incorrect or unreliable. In our opinion, the Report provides a reliable representation of the activities carried out by WIND TRE during 2021 and of the main results achieved. The information is reported in a generally clear, understandable and balanced manner. In the illustration of activities and results, in particular, WIND TRE has paid attention to adopt a neutral language, avoiding as far as possible the self-referentiality.

With regards to the reporting methodology outlined by the organization in its 2021 Sustainability Report, it is our opinion that principles from the GRI Standards (Stakeholder Inclusiveness, Sustainability Context, Materiality, Completeness, Balance, Clarity, Accuracy, Timelines, Comparability, Reliability) were duly implemented. It is also confirmed that the Report meets the GRI requirements for a “Core” Application Level and that our audit activities meet the GRI requirements for external assurance.

4. DECLARATION OF INDEPENDENCE, IMPARTIALITY AND COMPETENCE

Bureau Veritas is a global organization specialized in independent assurance, inspection and certification activities, with over 190 years history, 79.000 employees and an annual turnover of more than 4,9 billion euro in 2021.

Bureau Veritas applies internally a Code of Ethics and we believe there were no conflicts of interest between members of the assurance team and WIND TRE at the time of the assurance.

Bureau Veritas Italia S.p.A.
Milan, July 18 2022

Giorgio Lanzafame
Local Technical Manager





WINDTRE

