

MUCH



WINDTRE

Part of the CK Hutchison family, WINDTRE is the number one company in the mobile market in Italy and one of the main alternative operators in the fixed sector.

WINDTRE is the number one mobile operator in Italy and one of the leading alternative operators in the fixed sector. The new single brand, created in March 2020, consolidates the company's value positioning, which aims to facilitate human relationships and support all customers in facing the challenges of the present. The new brand focuses on a welcoming technology that is 'much closer' to people's everyday lives.

WINDTRE is the Italian player of reference in fixed-mobile integration and in the development of next-generation fiber networks, thanks to the agreement with Open Fiber for the implementation of the ultra-wideband network in Italy. In mobile telephony, WINDTRE has invested heavily in the process of consolidating its network, defined as 'Top Quality' by leading specialist institutes, to support the most innovative ICT services, to the benefit of families, citizens and businesses.



LETTER TO STAKEHOLDERS

GRI 102-14*



Dear readers,

2020 was an unprecedented year. An invisible enemy turned our lives upside down and imposed social distancing on us as a defence mechanism. The pandemic revealed the imbalances and inequalities that threaten our social cohesion, and the difficulties of establishing practices capable of guaranteeing a sustainable, responsible, and inclusive future for everyone.

At the same time, **2020 brought about change in the most concentrated form we've ever experienced:** due to the Covid-19 pandemic, in just a few months' time we became accustomed to using digital platforms to work without meeting in person, to learn from a distance, and to celebrate occasions together but separately. We used to wonder what the main driver of the shift towards digital business would be, and whether the shareholders, managers or institutions would play a major role in this change. Well, today we can confirm that the driver of that change was the pandemic, which prompted us to embrace the digital transformation more quickly and with greater intensity than we would have ever imagined.

Despite the extraordinary increase in voice and data traffic, our new Top Quality-certified **mobile network** allowed us to guarantee continuity of service with extremely high quality. Our **initiatives aimed at young people** helped ensure access to education, while at the same time teaching the next generation about digitisation during the mandatory periods of Distance Learning. We reaffirmed our status as a **Top Employer** by protecting our people effectively and quickly adapt to the emergency. Working from home, our **customer service** team continued to reach out to WINDTRE's millions of customers using remote solutions, thus allowing us to stay close to them while ensuring maximum safety.

However, the pandemic and the consequent adaptation measures didn't distract us from our environmental commitment: in fact, in 2020 WINDTRE **achieved the CO₂ emission reduction goals** jointly set with the WWF in 2017, with a reduction of over 70% in emissions per unit of traffic, and of over 18% in total emissions.


I am therefore prouder than ever of the entire WINDTRE team, and the commitment they showed throughout this truly exceptional year. Also, because this year we were able to look even further ahead. Because if we want to bring about change, it's up to us to make it happen.

And we did it by collaborating **with our managers, our young people, and our key stakeholders** to establish an ambitious sustainability plan that has its horizon in 2030, consisting of **measurable and tangible objectives which are fully integrated within our business**, and will guide us down a progressive and transparent pathway of implementation in the years to come. We will strive to continue improving the safety and awareness of families, young people and businesses on the web, to ensure the digital inclusion of seniors and people with disabilities, to overcome the digital divide on both a geographical and service-provision level, to improve gender equality and our people's preparedness for the future, and to protect our environment by undertaking clear and challenging commitments.

In this document you can read about who we are, discover what we've already achieved, and learn about the commitments we've assumed to build a better future. A future in which we can all find the courage to change, to trust each other, and to take responsibility for our individual and collective choices. Knowing full well that we will always be able to count on the **strongest network of all:** the one made up of people.

Jeffrey Hedberg
C.E.O. of Wind Tre S.p.A.

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OUR IDENTITY

PURPOSE

We exist in order to close the distance between people

at WINDTRE we believe in people, all people, and we know that together, united, they can achieve great things. We want our technology to be a tool to encourage and support all people to eliminate both distance and prejudice through listening and accepting diversity.



VISION

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

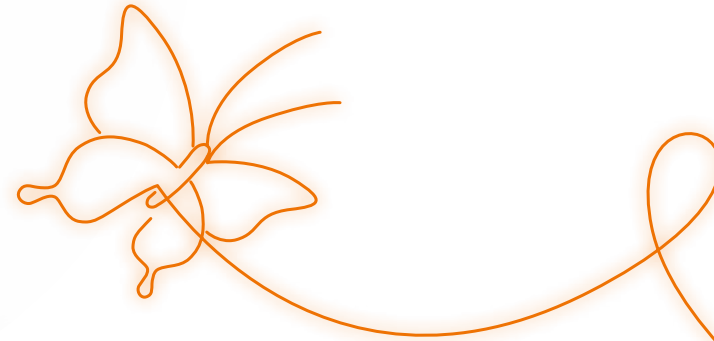


MISSION

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



VALUES



TRUST

Trust is 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. Trust is important to our external stakeholders, but especially to our customers, who choose to rely on us and our technology every day to manage part of their lives and relationships.

RESPONSIBILITY

Responsibility is setting an example, showing commitment and respect

It means accepting and keeping promises, focusing on today without losing sight of the impact on the future. It is everyone's responsibility: our company, our people, our clients, and our environment. It is our investment in contributing to a better company and society for future generations.

INCLUSION

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 or digital knowledge. We look to the future, and our future depends on how many more people choose our technologies.

COURAGE

Courage is 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. Courage is not just a requirement for individuals, it is good for the community, because it is unstoppable.



2020, AN UNPRECEDENTED SCENARIO

THE GLOBAL HEALTH EMERGENCY

[GRI 102-14*]

90 million

confirmed cases of Covid-19 worldwide at the end of December 2020, including 2.1 million in Italy.
[WHO and ISTAT, 2021]

-4.4%

decline in world GDP in 2020, -8.9% in Italy.
[IMF and ISTAT, 2020]

70 million

people at risk of extreme poverty due to the effects of the pandemic in the world. 5.6 million of these were in Italy, about 1 million more than in 2019.
[UN, 2020]

+56.1%

growth in the volume of data traffic on the mobile network in Italy in 2020.
[AGCOM, 2021]

90%

of large companies (>250 employees) and more than 70% of medium-sized companies in Italy have introduced or extended remote working during the health emergency.
[Istat, 2020]

1/3

of Italian households do not have a computer or PC at home.
[Istat, 2020]

THE EXPONENTIAL CRISIS TRIGGERED BY THE PANDEMIC

By the end of 2020, there were over **90 million confirmed cases** of Coronavirus worldwide and almost **2 million deaths**¹, including over 635,000² in Europe.

More than 50% of the global population was subject to lock-down measures during the first half of 2020³, with significant economic and social consequences: global trade contracted by more than 10%, with **global GDP falling** by more than 4.4%⁴.

The lock-down caused a universal social wound, which particularly affected the youngest: more than 1.6 billion children (90% of the world's student population) were unable to attend school⁵. While the long-term impact of the pandemic is difficult to predict with certainty, during 2020 it became clear that the poorest and most vulnerable segments of the population have been and will be disproportionately impacted. In 2020, it is estimated that more than **70 million people will fall below the extreme poverty line**, the first increase in poverty levels for more than 20 years⁶.

In **Italy**, the first European country to be hit by the pandemic, **more than 2 million people** were infected and almost 76,000 deaths were caused

by the epidemic in 2020⁷.

At national level, the spread of the Coronavirus epidemic forced the Italian government to introduce increasingly stringent restrictions, with a significant impact on the entire population. The health emergency severely affected the Italian economy, causing a marked **fall of -8.9% of GDP** in 2020 with a partial recovery in 2021, estimated at around 4%⁸.

The lock-down also had a strong impact on employment: at the end of December 2020, around **450,000 fewer people were employed** than in December 2019⁹, a number that is set to rise when the government ban on redundancies is due to be lifted in the summer of 2021¹⁰.

As the pandemic continues, the economic cost of Covid-19 is likely to continue to mount, threatening to reverse years of progress in reducing poverty and inequality. Indeed, **poverty in Italy grew significantly** in 2020, reaching a 15-year high: **more than 2 million households are in absolute poverty** (7.7% of the total against 6.4% in 2019), up by 335,000 households. Overall, the number of people living in absolute poverty in Italy exceeds 5.6 million, more than a million more than the previous year¹¹.

¹ Health Emergency Dashboard, 15 March, 09.47 am.

² WHO European Region Dashboard, 12 March 10.00 am.

³ Agence France-Presse

⁴ IMF, World Economic Outlook, 2020.

⁵ Sustainable Development Goals Report 2020, United Nations, 2020.

⁶ Ibid. note 5.

⁷ WHO European Region Dashboard, 12 January, 10.00 am.

⁸ Eurostat (2020): Quarterly national accounts - GDP and employment.

⁹ ISTAT, 2021.

¹⁰ Il Sole24Ore, 15 March 2021.

¹¹ Istat, 2021.

2020 IN THE TELCO WORLD

Globally, the acceleration of digitisation caused by the pandemic was a strong boost for the TELCO sector, which had been emerging from a historical period of **declining revenues** and **global challenges to growth**.

Fierce competition between market players has led to a major **price war** and market saturation is reinforcing **barriers to entry**. Telecommunication networks are very expensive and widespread infrastructures that need constant maintenance and upgrading. This is why a few, large players with high spending capacity have traditionally dominated the market. The arrival of more agile **digital competitors**, without their own infrastructure and with diversified services, such as OTT (Over-The-Top) operators like WhatsApp or Netflix, is making the competitive landscape of the TELCO sector increasingly fluid and multi-service, adding new challenges for the more traditional players.

In 2020, the **demand for mobile network capacity and coverage** continued to grow, while the construction of the **5G network** advanced rapidly: according to recent estimates¹², by the end of 2020 more than **1 billion** people globally were living in areas covered by this infrastructure, and around **220 million citizens** had signed up for 5G mobile offers.

Demand for **home connectivity** also grew strongly. The volume of demand for broadband connectivity services, such as FWA (Fixed Wireless Access) in particular, is set to triple in the coming years, reaching over 180 million subscriptions in 2026.¹³

The growth in demand, both in the fixed and mobile segments, meant that the entire sector recorded **less negative results** than other economic sectors and the macroeconomic scenario in general, thanks in particular to the positive contribution of online advertising, e-commerce and streaming.

The TELCO sector in **Italy** also experienced a similar phenomenon, although overall **revenues fell by 5.3%**, due to a reduction in both fixed network revenues (-4.5%) and, to a greater extent, mobile network revenues (-6.2%)¹⁴.

HOW ITALIAN TELCOS ROSE TO THE CHALLENGE OF LOCK-DOWN

The TELCO sector took on a key role in managing the implications of the pandemic in many areas of the economic and social system, acting as an **enabler and guarantor of continuity** in essential social activities and rights. Two examples of this were education and work: in March 2020, at very short notice, more than **7.1 million students**¹⁵ converted to **online learning** after schools closed and around **8 million Italians**¹⁶ started working from home.

This situation prompted a **significant increase in the use of digital services and products**, some driven by the need to adapt to government regulations on social distancing (such as working from home, distance learning and e-commerce), and others linked to the accelerated digitisation of certain sectors (such as digital media, social networks and streaming channels).

The sum of these elements generated a sharp **increase in data traffic** during lock-down periods - up **49.5% on the fixed network** and around **56.1% on the mobile network**¹⁷ - representing a major stress test for telecommunications networks. On the other hand, the pressure of demand for connectivity and the intensity of Internet use required almost simultaneous reinforcement of the digital infrastructure which, in some cases, was not resilient enough to cope with this overload. This is what happened, for example, in April 2020, when the Istituto Nazionale di Previdenza Sociale (INPS) had to manage the influx of millions of applications for the VAT bonus electronically, in full lock-down mode. The limited capacity of the Institute's software, compared to the unusual volume of applications, caused the site to crash and citizens' personal data to be leaked.

¹² Ericsson Mobility Report, 2020.

¹³ Ericsson Mobility Report 2020.

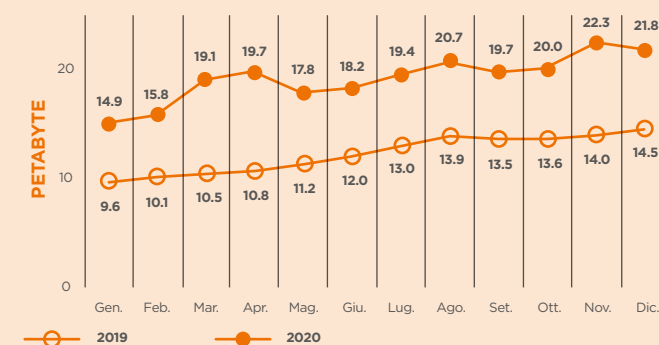
¹⁴ AGCOM, Communications Observatory, Covid-19 monitoring, no. 1/2021; cumulative values as of the third quarter of the year compared to the same period of the previous year.

¹⁵ ISTAT, 17 March 2021, 9:00 am.

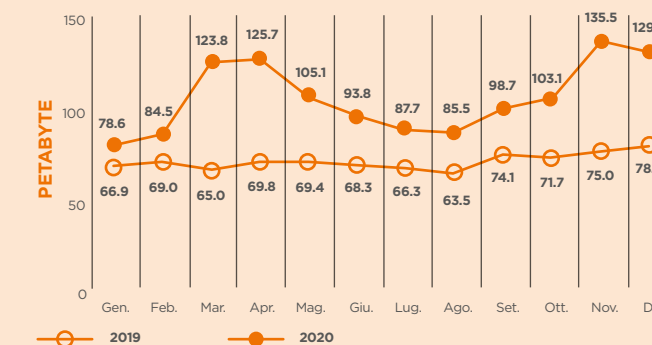
¹⁶ Cgil and Fondazione Di Vittorio, 2020.

¹⁷ AGCOM, Communications Observatory, Covid-19 Monitoring, no 1/2021.

MOBILE NETWORK



FIXED NETWORK



Graph 1 and 2 - Fixed and mobile networks: average daily data traffic in Italy (download + upload). [AGCOM, 2021]

THE DIGITAL DIVIDE: A TERRITORIAL AND SOCIAL CHALLENGE

In 2020, it became clear exactly what the digital divide in Italy means, especially in the southern regions and in schools. Limited broadband capacity in some areas, unsatisfactory performance in terms of connection speed and quality, and uneven equipment provision highlighted the **digital divide at geographical, social and economic levels**.

According to recent speed tests (market analyses that examine in detail the evolution of network speed), the average **connection** and the level of coverage of the Italian network is **not the same** throughout the territory: just to give an example, in Campania the connection is over 66 Mbps while in Val D'Aosta it is around 16 Mbps¹⁸.

Moreover, the pandemic exacerbated the digital exclusion of certain sectors of the population, automatically increasing the **risk of economic, educational, informational and social marginalisation**. Over 34% of Italian households do not have a computer or tablet at home¹⁹, without which they cannot follow distance learning programs or work remotely. This limited access to digital services increased inequalities and created new gaps, to the disadvantage of the poorer, older and less educated sections of the population.

The tools for recovery defined by the European Commission in 2020 offer an extraordinary opportunity to bridge the digital divide in Italy, overcoming the infrastructural, economic and social and skills gaps that characterise the country today. **Next Generation EU** and the **€1.8 trillion** Multiannual Financial Framework to 2027²⁰ focus recovery efforts across three main axes: ecological transition, social resilience, and digitisation. The Italian **National Recovery and Resilience Plan**, which brings the European commitment to the national level by defining strategic objectives for public investment, also identifies **digitisation and innovation** as the top priority for the competitiveness of the production system²¹.

These tools are also designed to reinforce the **Digital Europe Programme**²², the EU's technology strategy for 2021-2027, which aims to **strengthen the digital infrastructure**, define a common cybersecurity strategy, complete the digitisation of the public sector and invest in citizens' digital skills.

A NEW HORIZON FOR BUSINESSES AND DIGITAL PROFESSIONALS

The pandemic also saw **new business models** emerge as a result of the evolving demand for digitisation by companies themselves. Firstly, the massive **dematerialisation of many services** and the widespread deployment of remote working measures accelerated the already growing demand for **business-to-business cybersecurity** services. In 2020, spending on cybersecurity solutions reached €1.37 billion in Italy, up 4% on 2019²³.

The market opportunities of 4.0 technologies such as IoT have the potential to revolutionise key sectors such as healthcare, where the introduction of 5G could generate rapid and widespread deployment of **healthcare models based on the Internet of Medical Things** and Artificial Intelligence.

In order for the **digital transition**, which is one of the major objectives for recovery set by the European Union, to become a **lever for development**, an increasing number of ICT-related professionals must be educated and trained. There is a growing need for **new technical profiles** linked to knowledge of innovative phenomena and tools, such as **Big Data, IoT, robotics and Cloud computing**. Today, businesses are no longer just looking for specific IT expertise, but rather a portfolio of capabilities and solutions that enable the smart evolution of products (which become connected products, thanks to IoT), and integrated platforms to manage business processes, such as order and customer relationship management and data collection.

At this time of profound change, it is therefore essential for the entire economic and productive fabric, and especially for telecommunications players, to **invest in people and their intellectual capital**. Training and developing new hard and soft skills in technical and digital areas are key factors in seizing the growth opportunities offered by the ongoing transformation.

This is particularly true in **Italy**, which has historically lagged behind its European neighbours: according to the European Court of Auditors²⁴, more than **50% of the Italian working population** lacks digital skills. This phenomenon is even more significant in the light of the pandemic and the accelerating digitisation of many aspects of daily life and especially work, with the use of digital tools becoming a requirement for access to the vast majority of available jobs²⁵.

¹⁸ SOSTariffe.it, 2021.

¹⁹ ISTAT, 2020.

²⁰ European Commission, *A new, modern Multiannual Financial Framework for a European Union that delivers efficiently on its priorities post-2020, (2020)*.

²¹ *National Recovery and Resilience Plan as approved by the Council of Ministers on 12 January 2021*.

²² *Regulation establishing the Digital Europe Programme for the period 2021-2027 (2018)*.

²³ *Cybersecurity & Data Protection Observatory of the Milan Polytechnic School of Management (2021)*. Note that although the market is growing, the percentage increase is lower than in 2019, when the Italian market grew by 11 percentage points compared to 2018. This trend can be explained by the economic impact of the pandemic, which forced Italian companies to face the increased security challenges with smaller budgets.

²⁴ *European Court of Auditors, Analysis no. 02/2021: EU action to tackle low digital skills*

²⁵ *Ibid note 24*.

THE 4 AREAS OF OUR SUSTAINABILITY MODEL

We want to build a sustainable future together, starting with the four areas that we chose with our stakeholders and in which we feel we can make the biggest contribution.



EDUCATION

Young people
Digital
Culture

In an increasingly connected world, it is necessary to catch the extraordinary opportunities that technology offers us, putting them at the service and at the center of education, starting with the youngest, to enable a future sustainable and inclusive. We at WINDTRE continue our commitment to support schools in a difficult time, supporting the new generations with all the tools they need to face a digital world in continuous evolution and seize its opportunities.



RESPONSIBILITY

Integrity
Respect
Partnership

A new era for accountability has begun: abiding by the rules is not enough, we have to imagine new ones to respond to the challenges of digital revolution. We at WINDTRE are committed every day to protect safety online trying to reach higher and higher standards. For us security means protecting customer data and the Privacy of all users we interact with, but above all to protect the most vulnerable groups from potential online threats.



INCLUSION

Integration
Diversity
Dialogue

Digital technologies represent an extraordinary opportunity for breaking down barriers and ensure greater inclusion by strengthening equal access to the network and its benefits, regardless of gender, race, age, disability, status. This is why we at WINDTRE work to fight the digital divide, promoting an increasingly usable network and spreading a culture of inclusion.



LIFE

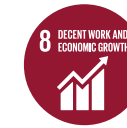
Environment
City
Health

For us at WINDTRE it is important to enhance the interconnection between the environment, health and the quality of life, being inspired by the potential of digital technologies to support human life and the Planet. In 2020, in addition to having achieved the emissions reduction goals defined with WWF Italy in 2017, we supported the health system in the most difficult moment.

EDUCATION



YOUNG PEOPLE
DIGITAL
CULTURE



Seizing the extraordinary opportunities that technology offers us, putting them at the service and centre of education, starting with the youngest, to enable a sustainable and inclusive future.

The issues that matter*:

• CONTINUOUS DIGITAL LEARNING

What it means to us

- EDUCATION IN DIGITAL TECHNOLOGIES to provide the skills needed by those who will live and work in a world profoundly changed by ICT.
- EDUCATION USING DIGITAL TOOLS as a means of improving the quality and scope of teaching by exploiting the potential of ICT.
- EDUCATION IN INNOVATION, starting with schools and universities, as a means of promoting sustainable development.

* for the complete materiality analysis see page 98 and following

WE DISCUSSED IT WITH...



Riccardo Donadon

A well-known entrepreneur from Treviso, Riccardo has been involved in the world of the web since he was very young: he founded Mall Italy Lab, then E-TREE and in 2005 H-Farm, the digital entrepreneurship platform now considered the largest innovation centre in Europe.

DIGITAL REVOLUTION AND EDUCATION

“Technology brings opportunities for young people that were unknown to previous generations. Think of virtual reality, which allows today’s young people to learn the structure of DNA by navigating through chains of amino acids or to understand the Solar System by ‘walking’ through the galaxy. It is an extraordinary new way of learning that stimulates creativity, entrepreneurship, problem solving and so many skills that are crucial in the world of work and for an individual’s success. At the same time, however, the acceleration of technological development can fuel inequalities, exacerbating economic and generational gaps: digitisation must be approached strategically so that it is inclusive and generates value for society as a whole.”



Mirta Michilli and Alfonso Molina

Mirta contributed to the drafting of a memorandum of understanding with the government for the development of an e-government plan for the city of Rome. Alfonso taught at the University of Edinburgh for over 20 years. Together they set up and still run the Fondazione Mondo Digitale, of which WINDTRE is a founding member.

EDUCATION FOR A DIGITAL WORLD: A JOURNEY INTO THE 21ST CENTURY

“Creating an inclusive knowledge society means making sure that the opportunities of technological development truly benefit everyone, without exception. With the Fondazione Mondo Digitale we have developed an educational model that we call ‘education for life in the 21st century’. We like to use the metaphor of a journey: we are all travellers in a complex territory that requires us to learn and then teach a new language, that of the 21st century. This is the only way to give our young people the right tools to face the challenges and seize the opportunities of this extraordinary century of change.”

#CHANGETALKS

OUR 2020



- **La cartella sospesa** (the suspended school bag): school kits for students and families in difficulty
- **Studiare Connessi** (connected study): **100 GB per month for 3 months for families in difficulty** to ensure access to Distance Learning
- **Connessi e Promossi** (Connected and Promoted): **50 GB to reduce the distance** between pupils and teachers
- **Global Goals Kids Show Italia**: the TV show **educating children about sustainability**
- **Hack&Go**: the hackathon to imagine **the cities of the future together** with young innovators
- More than **100,000 hours of training**: we’re preparing the leaders of the future
- **OnStage**: Generation Z training programme continues
- **Jobs for the future - the future of jobs**: the project to design WINDTRE’s Workforce Plan to 2025

LIFELONG DIGITAL LEARNING

Why it's important

1 in 3

European citizens believe that digital networks can have a positive impact on society by increasing the accessibility, efficiency and personalisation of services, both public and private. [UE, 2019]

3.8%

of Italian companies are considered digitally 'mature' with an integrated use of available digital technologies. [Istat, 2020]

9.5%

of employees in Italian public administrations have been trained in IT. [Istat, 2020]

25th out of 28

Italy's ranking in the Digital Economy and Society Index (DESI), which measures the digital skills and infrastructure of EU countries. [EC, 2020]



La Cartella Sospesa

[GRI 103-1, 103-2, 203-1]

The experience of lock-down exposed the economic and social gaps in society, showing how difference in income - and in some cases differences in the **digital equipment** owned by Italians (PCs, tablets, smartphones) - could put a strain on the continuity of school learning. In order to give targeted support to the most disadvantaged sections of the population, the **Insieme si può** Committee, a WINDTRE initiative that allows all employees to participate in proposing and voting on solidarity initiatives that can be contributed to by the company, chose to allocate all project funds in 2020 to the **La cartella sospesa** initiative. In Bergamo, Milan, Naples and Rome, children and young people in difficulty received a school kit with exercise books, pens, coloured pencils, pencil cases, compasses and sketchbooks, as well as tablets for families in need. The recipients were identified with the support of the Comunità Sant'Egidio and the no-profit organisation Sport Senza Frontiere. Thanks to La cartella sospesa, more than 240 children in Rome alone have been able to receive the kit for their distance learning.

Studiare Connessi

In collaboration with **Microsoft Italia and La Fabbrica**, WINDTRE has made its expertise available with the project **Studiare connessi - Un nuovo modo di fare scuola**. With this initiative, designed to support the entire school ecosystem, including teachers and parents, all participating schools were able to offer at least 5 of their students a free Internet connection for 3 months.

By subscribing to a Microsoft Office 365 Education licence, which can be activated and used free of charge, the connected institutes were able to **support families** experiencing a particularly difficult time by requesting up to 5 coupons to activate 5 WINDTRE SIM cards, providing free data traffic of 100 GB per month for 3 months.

Connessi e Promossi

Connessi e Promossi was created to bring schools closer to students by offering connectivity to facilitate access to distance learning. The project stems from the desire to pass on the Purpose of the WINDTRE brand, "**much closer**", to schools and young people and to reduce the **distance between school and family** as far as possible. Each school that joined the project was thus able to request the activation of an **additional 50 GB** per month for four months directly on their students' WINDTRE SIM cards, for a total promotional price of €15. This amount was borne directly by the school, using specially earmarked ministerial funds.

EduTime

To continue supporting DAD students, the **EduTime** initiative was launched in November 2020. This is **50 free GB** to use **from Monday to Saturday until 3 pm**, for studying, but not only. Dedicated to all Under 25 customers with a WINDTRE voice or Internet offer, EduTime is also part of the activities launched in 2020 to support young people.

Generation: the OnStage programme continues

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.

Entering its fifth year in 2020, the **OnStage** Internship Program is a training and personal and professional development path dedicated to undergraduates and recent graduates. With this programme, young talents are accompanied by a dedicated Tutor who assists them in carrying out a 6-month Project Work. During this period, the young people attend 7 training sessions per month, focusing 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 2020, with the participation of 32 recent graduates, 13 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 trainer, WINDTRE interns had the opportunity to learn how to recognise and enhance their own unique personal brand, both online and offline.

With the aim of bridging the gap between the academic and professional worlds, in 2020 WINDTRE took part in numerous **Virtual Career Days** and **Tech Events**, also involving its Professionals as testimonials; thanks to these events over 700 CVs were collected.

In particular, in 2020 WINDTRE focused on key **digital skills**, focusing mainly on the acquisition of talent in Big Data & Analytics and IT Development, such as Data Scientists, Data Engineers, Coders.

Once selected, the talents start an **OnBoarding** process, which includes a cycle of digital meetings between the new recruits and their company contacts to accelerate the induction process; 6 training modules held by internal managers and teachers to deepen the positioning and identity of WINDTRE within its competitive scenario.

ONSTAGE

The future starts from young innovators with Hack&Go!

Sustainable innovation in Smart Cities is one of the great challenges of the next decade and digital technologies can be the key to transforming cities into 'smart', connected and environmentally friendly places to live.

WINDTRE has risen to this challenge and to stimulate tangible responses has promoted, in partnership with Bosch, Fondazione Triulza and Concept Reply, "**Hack&Go!**", the hackathon dedicated to sustainable innovation in cities. The initiative was launched on 15 July 2020 and was open to all **university students**. It aimed to stimulate and collect the most creative ideas on Smart Cities and in particular on the possible synergies between technologies such as **5G, Big Data and IoT**, with mobility and other services to citizens. The winners with the best project ideas

were awarded a **6-month internship** to develop the project in the company.

The initiative was designed to set up a **co-design process** to rethink safety, mobility and daily life for the future of cities. 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.



Educating children about sustainability: Global Goals Kids' Show Italia

How can we tell children about the 'Sustainable Development Goals' of the 2030 Agenda? This is the question that the **Global Goals Kids' Show Italia**, a cartoon designed for boys and girls aged 5 to 10, has sought to answer. In 17 short episodes, actress Carolina Benvenuta told children what the SDGs are and why they are important for the well-being of the planet and present and future generations.

The cartoon, whose contents were curated by **ASviS** (Italian Alliance for Sustainable Development) and produced in collaboration with the **Edoardo Garrone Foundation** and **A future**, was presented at the **Festival of Sustainable Development**. The Festival represents the largest mobilisation of Italian civil society to promote the culture of sustainability through the organisation of widespread initiatives aimed at citizens, young people, businesses, associations and institutions.

All episodes of the Global Goals Kids' Show Italy, aired from 16 October 2020 on Rai YoYo, are available free of charge for the over 5 million children living in Italy, teachers and trainers, through the broadcasting channels made available by WINDTRE (Twitter, YouTube, the corporate website www.windtregroup.it, the company Intranet, the Facebook group NeoConnessi - Parents, children and Internet).



JOBS OF THE FUTURE - THE FUTURE OF JOBS

During 2020, the **Jobs of the future and the future of jobs** project was launched, aiming to shape a structured response to the company's current and future business needs by designing **WINDTRE's Workforce Plan to 2025**.

By implementing the **Job System** and **mapping existing skills**, as well as analysing and identifying the most sought-after emerging skills in a 3-5 year time projection, we will be able to design a **reskilling/upskilling** plan to renew the competitiveness of the current workforce. The project also aims to stimulate reflection on a **long-term recruitment plan**. As part of the initiative, **42 key executives** and **37 specialised partners** and experts from the TELCO industry were interviewed during 2020, and an in-depth documentary analysis was carried out in order to build a **database to monitor supply and demand trends in the job market**.

The results - i.e. the identification of **15 trends**, divided into People, Market, Commercial and Technology, of **29 emerging professions** and of **28 skills** (hard and soft) needed to face the job of the future - will be consolidated in 2021.

DEVELOPING SKILLS IS OUR PRIORITY
[GRI 404-2]

A number of skills development and learning programmes on **technical, digital, regulatory, linguistic, technological development**, transversal skills or specific 'job' skills were implemented in 2020.

The **Digital Mindset and Skill Development** programme launched in 2020 aims to prepare WINDTRE's people for the **challenges imposed by digital transformation** and to develop the necessary skills through a multi-year training programme. This programme, which involves the entire corporate population, is carried out in collaboration with **MIP**, the business school of **Milan Polytechnic**.

In partnership with **Luiss Business School**, more than 200 WINDTRE managers have been involved in the **Responsibility-Development of Sustainable Approaches** programme. The course dealt with all aspects of sustainability in order to develop awareness and knowledge on the subject and to disseminate behaviour in line with WINDTRE's Purpose and values such as **Responsibility, Courage and Inclusion**.

The Technology Department offered several training modules geared towards the acquisition of new technological procedures and skills. The main topics covered were: 5G and Network Function Virtualization, Six-Sigma, Itaca, Core Network Virtualisation.

With regard to training on soft skills, we launched **Easy Learning**, a module dedicated to online training on soft skills open to all WINDTRE employees and available on the **ConversatiON** digital assessment platform. The training catalogue offered in the initial phase consists of 30 courses organised in 7 thematic areas. The courses can be assigned to employees by managers as part of the Performance Development process, or they can be used by all employees without limitation for self-learning.

FIND OUT MORE IN THE APPENDIX 



TOMMASO VITALI

Brand & B2C Marketing Director
WINDTRE

“ Eliminating distances through connectivity, digital awareness and intergenerational inclusion ”

We believe that education and digital skills are crucial to prepare young people for the future, foster intergenerational inclusion and promote sustainable development. Thanks to the solutions we devised for the families, we were able to be “much closer” and create new opportunities for sharing and socialising, despite the physical distance due to the health emergency.

This is a challenge that we tackled with commitment on several fronts: offering the younger generation the quality of our network at favourable conditions to ensure continuity in their studies and initiatives aimed at stimulating them to make an increasingly aware and responsible use of digital technology, as well as bringing the more ‘analogue’ generations closer to the new communication tools, through programmes that enhance their inclusive role.

In an increasingly connected society, we need to develop a new form of intelligence that demonstrates full awareness of both the opportunities and risks of the digital world.

As the leading provider of network access, WINDTRE feels responsible for what happens online and wants to play an increasingly central role in the issue, providing everyone with the tools for a full understanding of the digital world, but also products for safer use of the network.

RE SPON SIBI LITY

INTEGRITY
RESPECT
PARTNERSHIP



What it means to us



A new era of accountability is beginning: it is not enough just to follow the rules, we have to come up with new ones to meet the challenges of the digital revolution.

The issues that matter*:

- CYBERSECURITY AND PRIVACY
- DIGITAL PROTECTION OF MINORS

- The ethical sides to THE OPPORTUNITIES AND RISKS of the web and the digital revolution.
- How to ensure that everyone in the company complies with the MAIN REGULATIONS AND ETHICAL STANDARDS.
- NEW CHALLENGES for individual responsibility, which legislation is often not yet ready to respond to.

* for the complete materiality analysis see page 98 and following.

WE DISCUSSED IT WITH...

Rosy Russo

A communications expert, trainer and creator of the Manifesto for Non-Hostile Communication, she is President of the Parole O_Stili Association.

KIND WORDS - BEING 'MUCH CLOSER' ONLINE

"Words can be simple in meaning but complex and profound in their impact. We must feel responsible when we share them online and spread them because we are what we communicate. The words we choose tell the story of the people we are: they represent us."

The web is like undiscovered territory: beautiful, full of pitfalls and with incredible potential. The important thing is to know how to inhabit it. This is why the first principle to bear in mind when we are online is that 'virtual is real': we are just as responsible for everything we do online as we are in our everyday offline lives."

#CHANGETALKS

OUR 2020



- **NeoConnessi even in lock-down:** the digital awareness programme continues with online activities
- Top of the class: **NeoConnessi wins award in Educational category** at the 24th Mediastars Awards
- **€15 million invested** in 2020 alone in services and platforms for data and systems security
- Data protection: a dedicated policy to **ensure the Privacy of our customers**
- Non-hostile communication manifesto and first Smartphone handbook: working with Parole O_stili to **promote respect and kindness online**
- **Total Quality Management:** an integrated management system to ensure quality and process safety along the entire value chain
- **891 active suppliers,** selected according to specific requirements on quality, environment, health and safety and ethics

CYBERSECURITY AND PRIVACY

Why it's important

\$ 3.85 million

the average cost of a data breach for the organisation involved.
[IBM Security, 2020]

4,66 mld

the number of connected users in the world, i.e. 59% of the global population (+7% compared to 2019).
[We are Social, 2021]

2,5 quintillion

the volume of data bytes per capita produced on average each year (equivalent to about 1/4 of the insects living on Earth today).
[Forbes, 2019]

5.000

the number of daily cyber-attacks detected globally during 2020. Before the pandemic they averaged 200 per day.
[Corriere della Sera, 2020]

Ever more resilient

[GRI 103-1, 103-2, 103-3]

Cybersecurity is a key element in ensuring the **resilience of digital infrastructures**. The regulatory framework of reference for these issues is continuously evolving and the current scenario requires constant dialogue between companies and regulatory authorities.

WINDTRE's collaboration with the institutional bodies responsible for cybersecurity therefore continued in 2020, 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.

In 2020 alone, WINDTRE invested about **€15 million** in services and platforms for data and system security - 33% more than in 2019 - focusing on three lines of development:

- **Network Security** - WINDTRE worked to develop and update security measures to protect network systems and the communications they support, integrating the deployment of platforms with various testing campaigns (Vulnerability Assessment/Penetration Test). The company also took part in the various institutional round tables to cooperate in the formulation and correct interpretation of the regulatory framework, which is currently undergoing a major evolution with the introduction of the implementation devices of the National Cybersecurity Perimeter.
- **Smart Working** - The operating environment imposed by the health situation has found WINDTRE's infrastructures and technological security devices already prepared to support remote work, but the focus has been increased both in Cyber Intelligence activities and in the active monitoring of devices and communication flows in order to adapt to the new scenario of cyber threats resulting from this set-up.
- **Customer solutions** - The technologies, skills and processes implemented to protect WINDTRE's perimeter also form the basis of the services developed to accompany client companies in the digital evolution of their business in complete security. Leveraging internally developed processes and technologies, new **dedicated service packages were put in place for WINDTRE's B2B customers**, to support them in managing IT security at such an urgent time as spring 2020.

During the year, **Cyber Intelligence** activities were boosted by the continuous analysis of both data extracted from “probes” on company systems and warning bulletins on possible cyber threats issued by national and international institutions. In this context, active monitoring activities were stepped up by the **SOC (Security Operation Centre)**, which uses a range of monitoring and control systems to carry out continuous, real-time threat protection and neutralisation activities, including the use of advanced data analysis and process automation technologies.

In 2020 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 criteria are extended to the entire supply chain, where checklists can be used to verify that the selected suppliers also implement adequate data protection measures.

Data protection

[GRI 103-1, 103-2 E 103-3]

The issue of **Privacy and data security** is very sensitive for a company like WINDTRE, which stores a huge amount of information about its customers, their habits, and preferences. The main challenge in this respect is to combine the complexity required by regulatory obligations with extreme simplicity in user experience and service delivery. This is all in a very dynamic context characterised by a continuous evolution of business and associated technologies.

WINDTRE is directly responsible for the impact of customer data management in terms of the information stored, but there can also be impacts arising 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 operate on customer data in full regulatory legitimacy as data controllers.

Any significant loss of data would entail considerable reputational, economic and operational risks for the company. In view of these risks, the company has taken all the measures necessary to ensure maximum data and information security, as well as complying with the latest Privacy and cybersecurity legislation, in the interests of both the company itself and its customers.

The company’s policy on Privacy and data security is primarily aimed at ensuring regulatory compliance on both a domestic and European level, even taking into account

the introduction of the new General Data Protection Regulation (GDPR) approved in 2016, which became effective on 25 May 2018, and the introduction of the new cybersecurity legislation. WINDTRE also aims to prevent any loss or damage of the data managed by the same, and to limit the damage and restore normal business operations as quickly as possible if any incidents do occur.

Due in part to the harmonisation processes that have taken place in previous years, WINDTRE has now adopted a **Governance, Risk Management and Compliance (eGRC)** system that allows it to keep the entire data processing chain under control, analytically assessing the level of compliance of each system involved. Specific **monitoring activities** are carried out periodically with all company managers in the context of keeping the register of processing operations, as well as verification activities through a self-assessment system of all suppliers appointed as data controllers.

During the year, the company also defined and implemented new processes and procedures to protect the security of **critical infrastructures**, in line with the requirements of the new national security regulations, and in particular the “Security and integrity measures for electronic communication networks and notification of significant incidents” established by the Ministry for Economic Development in 2018.

To ensure that data is properly managed, in terms of authorisation to process, profiling, enrichment and transfer of data, WINDTRE complies with the requirements of the **Data Protection Authority** with which the company has regular contacts and a relationship of full cooperation, to help define the best practices for protecting Privacy in the context of telecommunications.

On a par with other players in the market, two sanction proceedings against WINDTRE were completed in 2020, one of which was initiated in 2019. These proceedings resulted in the application of a sanction following some application discrepancies with respect to the internal instructions given, on which WINDTRE has implemented and communicated all **corrective measures** taken following the sanction imposed in July 2020.

As part of its responsibilities as Data Controller, WINDTRE has also stepped up **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. Taking into account the pandemic period, on-site inspections have been limited but carried out wherever possible and with appropriate caution. Customer reports, including those received by the Authority, are also regularly answered.

FIND OUT MORE IN THE APPENDIX 



“

We have to think up new rules in order to be resilient also in the world of the digital revolution

”

GILDA SALME'
Data Protection Officer
WINDTRE

The pandemic and lock-down have accelerated the focus and use of technology for everyday activities, from work to school to interpersonal relationships. Our cyber identity is therefore increasingly exposed.

Thanks to our constant attention to these issues, we have further strengthened the protection criteria with which we handle personal data and profiling, maintaining a constant and open dialogue with the Privacy Guarantor. With particular reference to network users (especially digital natives), we are closely following these issues (I am thinking of Big Data and Artificial Intelligence), their evolution and the evolution of the current scenario, which requires a constant confrontation between companies and regulatory authorities. Indeed, the speed with which our connected world is changing requires resilience, a new business model and new rules.

The future will make us all even 'closer' and needs more transparency: the culture of Privacy must also take a step forward, be perceived as an added value and, above all, must be 'user-friendly'.

CHILD PROTECTION IN THE DIGITAL ENVIRONMENT

Why it's important

23%

of young Italians aged 11-17 say they have been victims of cyberbullying.
[Italian Society of Preventive and Social Paediatrics, 2020]

2 - 4 h

the average time spent online each day by young Italians aged 11-17.
[Social Warning Observatory, 2020]

1 in 2

people around the world believes that fake news is widespread in digital media.
[Statista, 2019]

6%

of young Italians under 14 have sent intimate photos via private messages.
[Generazioni Connesse, 2020]

Online and Offline, no limits

[GRI 103-1, 103-2, 103-3, 203-2 A]

The **digital revolution** is having exceptional consequences for **people and society** as a whole, in terms of increasing possibilities and speed of interconnection with other people, freedom of expression, sharing and access to knowledge.

The **pandemic** and lock-down are further accelerating this process and making digital technologies increasingly essential for managing our daily activities, from work to social relationships.

However, in an increasingly connected world, **protecting our identity** has become a crucial issue. **Starting with the first times that we access the Internet.**

The use of the Internet and social networks is an integral part of everyday life for **digital natives** and others, in interpersonal communication, school education, information, study at home, and even sport.

Being able to protect the young and the very young with the right **media literacy** tools in relation to digital media and social platforms has become crucial for parents and educators today, in order to ensure that those who are most vulnerable have the right awareness (and responsibility) when surfing online.

OPPORTUNITIES	RISKS
<ul style="list-style-type: none"> • Transparency • Social connections • Information • Freedom of expression • Access to employment or study opportunities 	<ul style="list-style-type: none"> • Inadequate processing of personal data • “Hyperconnection”, “Smobie”, “Nomophobia” • Digital bullying and non-consensual sharing of intimate material • Spreading of fake news • Identity theft

The NeoConnessi project

Providing parents and teachers with the right tools to support and educate young people on how to make informed use of the Internet is the mission of the **NeoConnessi** project, WINDTRE's outreach initiative aimed at **Italian primary school children** (aged 8 to 11) to raise awareness of the safe and responsible use of the Internet.

In 2020 NeoConnessi has evolved to stay close to families, teachers and children during the lock-down with distance learning. To cope with the difficulties that arose during the pandemic, a Facebook group was set up on 25 March: **“NeoConnessi: Genitori, Figli e Internet”** (NeoConnessi: Parents, Children and Internet) to discuss and find answers to their questions, taking into account the most relevant issues. The group, which now has more than 10,400 members, is a valuable support to start a constructive dialogue on the use of digital resources in the home. In addition, a **cycle of 6 webinars** was held in April 2020 with the aim of addressing, together with parents, teachers and experts in the field, issues relating to digital education and the safe and positive use of the web and devices by children, discussing taboos and any fears related to the safety of their children online.

Since September 2020, the project has involved a total of **5,140 classes throughout Italy** who have received the NeoConnessi **printed kit**, consisting of a guide for teachers, a magazine for parents, a guide for class representatives and a handbook for children to learn while having fun.

The educational value of the NeoConnessi initiative was formally recognised in October 2020 during the **24th edition of the Mediastars Award**, the competition dedicated to innovation in the world of Professional Advertising Technicians. During the award ceremony at the San Fedele Cultural Foundation in Milan, NeoConnessi received the award for the first place in the **Educational** category and the **“Special Star”** for the copy strategy of the promotional campaign.

visit www.neoconnessi.it



Parole O_Stili

In 2020 WINDTRE signed the **Non-Hostile Communication Manifesto** drawn up by the no-profit association Parole O_Stili (<https://paroleostili.it/>). This charter lists ten principles to improve the communication and behaviour of people on the Internet. By signing the Manifesto, WINDTRE pledged to promote respect and kindness on the web.

During the Christmas holidays, WINDTRE decided to offer **“Il mio primo telefono”** (My first phone), the Parole O_Stili manual with advice on how to use the web and social media in a safe and non-hostile way, free of charge to anyone activating the WINDTRE Smart Pack Junior+ offer. Designed for children and parents who want to explore the web with awareness and without risk, the manual provides over 30 pages of suggestions, advice and games to play together to discover the web and its potential, acquiring the knowledge and skills that the great challenge of digital technology requires.



The Manifesto of Non-Hostile Communication

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

**WORKING FOR WINDTRE MEANS RESPONSIBILITY
[GRI 102-9, 102-10 E 102-11]**

The main players in the supply chain in which WINDTRE operates are often large international companies providing infrastructure, equipment, network services and software. **In 2020, WINDTRE had 891 qualified suppliers.**

In the selection, qualification and management phases, WINDTRE requires all suppliers to meet specific standards on **quality, environment, health and safety, and ethics**, in accordance with the provisions of the company's Integrated Management System and with a particular focus on suppliers who carry out activities with a potentially high environmental impact.

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.**

No significant discrepancies with the SA8000 Standard were found. The activity was an opportunity to raise awareness on issues functional to an effective compliance with the standard, such as the dissemination of the Disciplinary Code and the adoption of the Code of Ethics.

FIND OUT MORE IN THE APPENDIX 



TOTAL QUALITY MANAGEMENT

WINDTRE's Integrated Management System makes it possible to involve all company functions in guaranteeing and documenting the **quality and correctness of processes**, with the aim of guiding and monitoring performance by applying the principle of continuous improvement, typical of **"Total Quality Management"**.

WINDTRE's Integrated System consists of six certifications:

- **Quality** | ISO 9001:2015
- **Environment** | ISO 14001: 2015
- **Occupational health and safety** | ISO 45001:2018
- **Corporate social responsibility** | SA8000:2014
- **Information Security** | ISO 27001:2013 (Cloud services, Housing and physical security of Data Centres in support, provision of Security Management services and management of the Security Operation Centre)

During 2020 WINDTRE succeeded in adapting to the new international standard **ISO 45001** (Health and Safety) and obtained the **three-year renewal of the ISO 27001 certificate** (Cloud services, Housing and physical security of supporting Data Centres).

In **2021** the company will be engaged in the three-year renewal of the certifications: **ISO 9001** (Quality), **ISO 14001** (Environment), **ISO 27001** (Information Security - provision of Security Management services and management of the Security Operation Centre) and the annual confirmation of validity for the remaining certifications that make up the Integrated Management System.



INCLUSION

INTEGRATION
DIVERSITY
DIALOGUE



Ensuring everyone can participate in the social and economic life of the country, seizing the opportunities offered by digital technologies to build a fair and non-discriminatory community.

The issues that matter*:

- DIGITAL DIVIDE
- INCLUSION OF DISABILITIES

What it means to us

- Strengthening the sense of belonging for all people to a community based on the principles of fairness and EQUAL OPPORTUNITIES, without discrimination.
- DIGITAL INCLUSION and everyone's participation in the social and economic life of the country, thanks to the possibilities offered by digital technologies.

* for the complete materiality analysis see page 98 and following.

WE DISCUSSED IT WITH...



Vincenzo Falabella

A lawyer by profession, Vincenzo has been president of FAIP (Federazione Associazioni Italiane Paratetraplegici) since 2011 and was one of the founders of FISH Puglia. In 2015 he was elected President of FISH Onlus (Italian Federation for Overcoming Handicaps), a role he will hold until 2022.

UNDERSTANDING DISABILITY: OVERCOMING BARRIERS AND 'CONTAMINATING' EACH OTHER WITH TECHNOLOGY

"Disability is not a disease, it is the way we interact with our environment. We need to contaminate the communities to which disabled people belong, even the whole of society, so that they are recognised first of all for the people they are, and only then for the condition in which they live."

Those who work in this field should be the first to move to focus on the essential needs of disabled people. New technologies are a new gateway to services, utilities and relationships for people with functional limitations, and more generally for all those who live in a condition of exclusion."

#CHANGETALKS

OUR 2020



- Mai più soli (never alone again): the freephone number offering **psychological support to lonely elderly people** during prolonged periods of isolation
- Technology bringing people together: **more than 1,500 devices provided to as many Covid-19** patients in isolation
- **Disability Hub**: a virtual space dedicated to the inclusion of disabilities
- **Closer to your loved ones**: our video tutorial project to bring the over 60s closer to technology
- **Telefono Amico Italia**: active even remotely thanks to WINDTRE's Cloud Contact Manager
- **Working with mayors** to overcome the digital divide through collaboration with ANCI
- **Together we are stronger**: charity initiatives to support the communities in which WINDTRE operates

DIGITAL DIVIDE

Why it's important

34%

percentage of Italian Italian households that do not have not have a computer or tablet at home.
[Istat, 2020]

1,220

municipalities and their villages, hamlets and territories where mobile network coverage is absent or very weak.
[UNCEM, 2019]

63,000

Italian citizens living in areas where it is not possible to obtain any kind of Internet access.
[AGCOM, 2021]

5.4 megabit

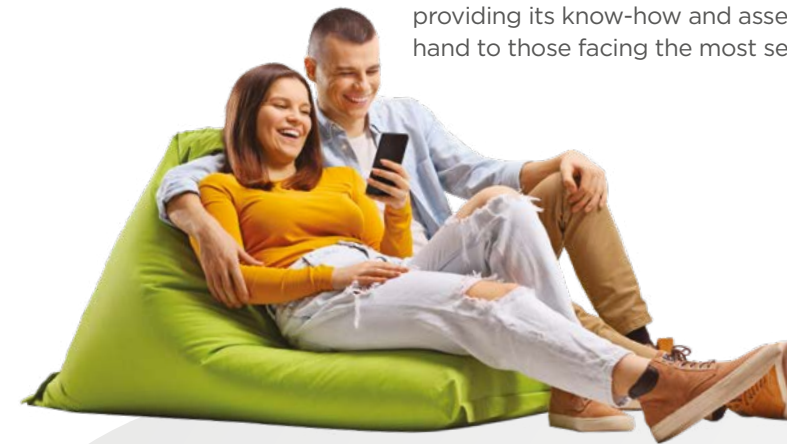
the average connection speed in Italy, 4 times slower than in South Korea, according to the Digital Economy and Society Index (DESI).
[European Commission, 2020].

A more inclusive network

[GRI 102-12, 103-1, 103-2, 103-2, 203-1]

The single brand WINDTRE was launched on 16 March 2020, positioning itself as **the network that closes distances between people** and consolidates relationships. To confirm our commitment to this, several initiatives have been launched in 2020 dedicated to those sections of the population that are **at highest risk of exclusion** today: people living in disadvantaged or remote areas, the disabled, and the elderly. For different reasons, they will see their chances of participation increase with an efficient and **inclusive** network, thanks to the access to services and opportunities it brings.

WINDTRE's positioning as **the network that closes distances** took on a unique significance in 2020, with the **health emergency** and the entrenchment of physical distances needed to contain contagions. WINDTRE moved to make its contribution during such a difficult time, providing its know-how and assets to extend a hand to those facing the most serious difficulties.



Mai più soli (Never alone again)

The first months of the Coronavirus pandemic, March and April 2020, were very hard on the whole population, but they undoubtedly hit **those living alone** and those in the highest risk groups who could not afford to have visitors hardest. This change has had a major impact on the lives of elderly people, many of whom do not have children, relatives or friends to turn to.

In collaboration with Senior Italia FederAnziani and SIPEm SoS, the Italian Society of Emergency Psychology, WINDTRE immediately activated a **freephone number to support elderly people** living alone, to provide them with help and psychological support during their prolonged period of isolation. The initiative involved a vast network of professionals operating throughout the country, who made themselves available to answer calls from anyone who needed a friendly voice and psychological support.

For WINDTRE, it was an opportunity to put its values of **closeness** and **welcoming technology** into practice, connecting people to each other and offering tangible support to those who would otherwise have been alone, potentially increasing the risks to their psychological and physical health in an already difficult period from a health point of view.

In the same spirit, in partnership with Your Voice, in May 2020 WINDTRE supported the no-profit volunteer organisation **Telefono Amico Italia**, which offers anonymous support in overcoming emotional tensions and breaking down loneliness.

WINDTRE offered the organisation its **Cloud Contact Manager** ICT solution, the web dashboard that allows organisations to manage and automate multi-channel communications, as well as enabling remote working, at favourable conditions. Thanks to the Cloud functions, the Telefono Amico volunteers were able to continue to carry out their support activities in complete safety, continuing to guarantee daily support to people in crisis or distress, despite the lock-down.

This type of intervention, in which WINDTRE put its technology at the service of emergencies and the most human needs of the community, proved to be truly significant, as demonstrated by the more than 400 calls handled daily, with peaks of 1,400 contacts per day during holiday periods.

Technology bringing people together

During the pandemic, WINDTRE also decided to stand by those who experienced the worst isolation, that caused by Coronavirus symptoms in hospitals.

In April 2020, WINDTRE donated **more than 1,500 devices**, including smartphones and tablets, with unlimited voice and data traffic

and protective gaskets to Covid-19 inpatients to ensure full compliance with hygiene standards.

This initiative involved more than 15 hospitals and care facilities in Lazio, Piedmont, Lombardy, Emilia-Romagna, Campania and Puglia.

Closer to your loved ones

In July 2020, a new collaboration between WINDTRE and **Senior Italia Federanziani** began with the **Più vicino a chi ami initiative**.

The initiative was inspired by the desire to accompany the over 60s in their approach to digital tools, and has led to the creation and dissemination of a series of **public video tutorials** that explain, step by step, how to use some of the most common online services, important tools to stay in touch with loved ones and to facilitate some everyday activities. From using messaging apps such as Whatsapp to creating a Google email account, from installing Facebook and Messenger to using home delivery platforms such as Glovo: a small guide to getting to grips with technology and starting to use services that are more present and important in our daily lives, but difficult to access for those unfamiliar with digital devices.

The initiative, carried out with Senior Italia FederAnziani and SIPEM SoS Federazione, received an award at the IX edition of the **NC Digital Awards**, one of the most important awards for digital communication in Italy, conceived and promoted by ADC Group.

New technologies in support of mayors

In November 2020, thanks to the collaboration with AnciComunicare, WINDTRE took part in the **37th Annual Assembly of Anci**, the National Association of Italian Municipalities.

During a live webinar, WINDTRE shared its point of view on the **territorial digital divide** in Italy and some ideas to help bridge it, referring in particular to **small municipalities and inland areas** of central Italy, among the least connected areas of the country.

The live meeting, entitled “New technologies alongside mayors”, touched on many topics that are particularly topical for citizens and local administrations, such as smart working, the digitisation of schools and the management of Distance Learning (DAD), not least environmental sustainability. Particular attention was also paid to mayors and their **key role in overseeing and protecting social cohesion** at local level.

For a telecommunications leader, **attention to local communities** has to be a key priority. WINDTRE intends to continue to work hand in hand with local governments and their representatives to extend, strengthen and modernise **digital infrastructure**, as well as enable the penetration of new technologies.

In fact, the commitment to bridge this gap between territories does not only aim to ensure a **more uniform Internet access** but, above all, it is essential to build a solid digital base for the launch of 4.0 technologies, such as those based on IoT devices, and a fair share of the benefits they bring.

On Air

To reduce the digital divide in different areas, WINDTRE launched **On Air** in 2020, the solution that doubles the availability of ultra-broadband connectivity for businesses through FWA (Fixed Wireless Access) technology, reaching even the most remote areas, not yet covered by fiber optics. 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.

WE'RE STRONGER TOGETHER

Charity Hub:

This is the company's digital space dedicated to **collaborations with no-profit organisations** and other organisations, which in 2020 involved: Doctors Without Borders, WWF, Treadom, 3BEE, Italian Union of the Blind and Visually Impaired, Cystic Fibrosis Foundation, UNICEF, Save the Children.

Charity Collections:

For many years, WINDTRE has been offering a **charity collection service to third sector organisations (ETS)** in collaboration with other Italian telephone operators. This service allows customers to make donations by sending an text or by calling from a landline. The funds raised are entirely transferred to the charity running the project supported. In 2020, WINDTRE raised and paid out over **€2.3 million**, supporting a total of **88 social and humanitarian initiatives**.

Support for the Italian Red Cross:

In March 2020, WINDTRE donated **€1 million** to support **Red Cross** operations on the ground, expanding the **reception capacity** of the Papa Giovanni XXIII hospital in **Bergamo**, the Policlinico in **Milan** and the Policlinico Gemelli in **Rome**. In addition, WINDTRE employees launched an **internal fundraiser**, encouraging each other to support all those on the front line against the Coronavirus with an **additional voluntary donation**.



Croce Rossa Italiana

LEAVING NO ONE BEHIND

Since July 2016, in partnership with Bee4, WINDTRE has been working with the inmates of the Bollate prison in Milan.

Bee4 was set up in order to give a serious and tangible response to inmates' demand for qualified work and **professional reintegration**, with the aim of making prison a place from which they leave better than they entered. The inmates' commitment to their work is also one of the aspects assessed for the granting of **reward permits**.

Currently, a total of **21 people** from the prison work for WINDTRE, plus 4 staff. The inmates' work provides a diverse spectrum of activities, such as:

- the indexing of documents from fax, registered and certified mail channels, the first step in processing customer files;
- handling incoming technical assistance calls;
- back office activities related to customer requests, e.g. deactivation of a user;
- the management of files coming from the sales force and related to reports/requests from customers.



DISABILITY INCLUSION

Why it's important

**2
billions**

people with physical or mental disabilities - the largest minority in the world, with over 2 billion individuals.
[Interaction Design Foundation, 2020]

**3.1
million**

people with disabilities throughout Italy, 5.2% of the population.
[ISTAT, 2019]

31.3%

the employment rate among disabled people in Italy, compared to 58% for people without limitations.
[ISTAT 2019]

600,000

People with disability in Italy who live in severe isolation, with no network to rely on in case of need.
[ISTAT 2019]



Disability Hub

[GRI 102-12, 103-1, 103-2, 103-3, 203-2 A]

WINDTRE's **Disability Manager** is the company's point of reference 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. Appointed in 2019, in 2020 they dedicated themselves to developing new solutions capable of simplifying everyday actions, to support the autonomy of people with disabilities in their daily lives, also thanks to the activation of partnerships between WINDTRE and bodies and associations dedicated to the needs of people with disabilities.

Among WINDTRE's internal initiatives, the Disability Manager has promoted the creation of a **Disability Hub** within the company Intranet: a space for sharing, providing information and in-depth news and articles on disability-related issues. The Disability Hub also offers all WINDTRE colleagues the opportunity to get in touch directly with the Disability Manager, sending reports and requests for support.

In order to ensure appropriate and timely handling of internal requests, the **Disability Hub Committee** was set up to examine the requests of employees with disabilities and propose ad hoc solutions, including the definition of internal policies for the management of specific cases, such as the management of working hours, the adaptation of workstations and the provision of assistive devices.

With 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 no-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 **working table has also been set up with FISH Onlus**, the Italian Federation for Overcoming Disabilities, 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 texts at a reduced price, as well as a dedicated helpline via WhatsApp.



“

We want to overcome all barriers through a more inclusive network”

PAOLO BERRO
Disability Manager
WINDTRE

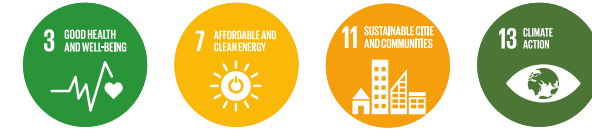
2020 was a strange year, in many ways. In fact, the health crisis brought about by the arrival of Covid-19 has highlighted one of the main technology-related problems, alongside the digital divide: the persistent presence of “barriers” preventing the more vulnerable sections of the population from accessing information, services, products and infrastructure.

Bringing together several departments within the company, we have taken on a major and ambitious challenge: ensuring digital accessibility for all.

As a Disability Manager I focused on helping people with disabilities. Within the company, we developed and proposed tailored solutions for colleagues with special needs. Externally, we developed special remote assistance and Customer Care solutions for our customers, thanks to a dedicated telephone line and a WhatsApp contact channel, as well as specific commercial offers for the deaf and blind.

In 2021, we will continue to make it our mission to help all people with physical or sensory disabilities, or who find themselves in a situation of technological disadvantage, also thanks to the involvement of major no-profit organisations in the sector.

ENVIRONMENT CITY HEALTH



Enhancing the interconnection between the environment, health and quality of life, being inspired by the potential of new digital technologies to sustain human life and that of the Planet.

The issues that matter*:

- **DECARBONIZATION**
- **SMART TECHNOLOGIES FOR ENVIRONMENT AND HEALTH**

What it means to us

- Protecting the environment and **QUALITY OF LIFE** in every aspect: from the home to city streets, from healthcare to protecting the global ecological balance.
- Accelerating the sustainable and digital transition of towns and **CITIES**.
- Exploring the frontiers of telecommunications and developing new technological applications in high-impact sectors, such as **HEALTHCARE**.

* for the complete materiality analysis see page 98 and following.

WE DISCUSSED IT WITH...



Luca Mercalli

Meteorologist and expert in the communication of environmental issues, Luca is the President of the Italian Meteorological Society. He has been carrying out scientific research on climate change and global warming for over 30 years.

CLIMATE CHANGE: THE CHALLENGE IS NOW

“From the Alps to our coasts, to our historical and cultural heritage: we must be ready to mitigate climate change and adapt to its concrete consequences. Sea levels will be higher, we will have more heat waves, we will have to change our farming practices and rethink our water infrastructure.

Reducing emissions rapidly, despite the growth of our economic system, requires a major technological and political effort. It does not mean reducing our standard of living. It means paying more attention to everything we do: each product and process involves extracting raw materials and consuming energy.

Technological innovation is one of the recipes for meeting these challenges: it can help us reduce inefficiencies and facilitate the transition of the energy system.”

#CHANGETALKS

OUR 2020



- **18% reduction in CO₂ emissions** between 2017 and 2020 despite an exponential increase in data traffic
- Energy efficiency: **more than 16,000 BTS** with energy-saving technology
- We achieved our **decarbonisation targets**, set as part of the partnership with WWF Italy on climate and energy
- Together with WWF again in 2020, to **reduce our environmental impacts** and protect ecosystems
- **87 car shares and 63 electric or hybrid cars**: to promote car sharing and facilitate sustainable mobility
- Energy Supervisor: the **ICT solution** to support customers in reducing energy consumption
- **Beyond 5G Trial**: a new trial to promote and develop innovative services with high social and economic value
- Continuous control of **electromagnetic emissions**
- **Smart business solutions**: to meet the needs of all B2B customers, also in the light of the new daily requirements that have emerged with the pandemic

DECARBONISATION

Why it's important

1.5°C

the maximum limit on the increase in emissions set by the Paris Agreement in order to reduce the negative consequences of climate change as far as possible. [IPCC, 2015]

€1.000 billion

the economic cost of not taking climate action by the world's largest companies. [Reuters, 2019]

3 in 5

of the biggest global risks in terms of impact are environmental. [WEF, 2020]

-55%

the European target of reducing climate-changing emissions by 2030 compared to 1990. [CE, 2020]

¹ Since WINDTRE is not subject to any legal constraints concerning the reduction of CO₂ emissions, all the initiatives taken in this regard are purely voluntary [GRI 305-MA 1.2].

Energy consumption in the TELCO world

[GRI 103-1, 103-2, 103-3, 203-1]

The **TELCO sector** is thought to be responsible for around **2% of global climate change emissions**, and this figure is set to rise as more and more devices and infrastructure are used to transport data. The telecommunications network consists of a **physical infrastructure**, made up of antennas and data centres, which is continuously powered by electricity and air-conditioned 24 hours a day to prevent equipment from overheating. This energy requirement constitutes the main environmental impact of a TELCO operator.

Of the climate-changing emissions, the most significant portion is CO₂ emissions. In order to measure the CO₂ emissions attributable to an organisation, we need to divide them into three segments (Scope):

- **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 of goods over which the organisation has influence.

TELCO emissions are mainly concentrated in **Scope 2**, due to the electricity purchased in order to operate networks and the data centres connected to them.

At WINDTRE, over **94% of energy consumption** is attributable to **network infrastructure**, while 5% of energy consumption comes from shops, offices and call centres, and the remaining 1% from fuel consumption for the corporate fleet. For years, WINDTRE has been **committed to significantly reducing its energy consumption**, helping to meet the challenge of energy transition while continuing to ensure high infrastructure performance.

Constant monitoring of energy consumption allows WINDTRE to devise and develop solutions to reduce its environmental impact by changing individual behaviour and relying on the support of technology⁷.

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

Total energy consumption (Gj)	2020	2019	2018
Total energy consumed	2,960,977	3,066,366	3,103,229
<i>Of which direct consumption (scope 1)</i>	<i>96,307</i>	<i>252,909</i>	<i>268,447</i>
<i>Of which indirect consumption (scope 2)</i>	<i>2,864,670</i>	<i>2,927,882</i>	<i>2,955,123</i>

FIND OUT MORE IN THE APPENDIX 

Energy efficiency projects

After the merger between Wind and H3G, WINDTRE 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:

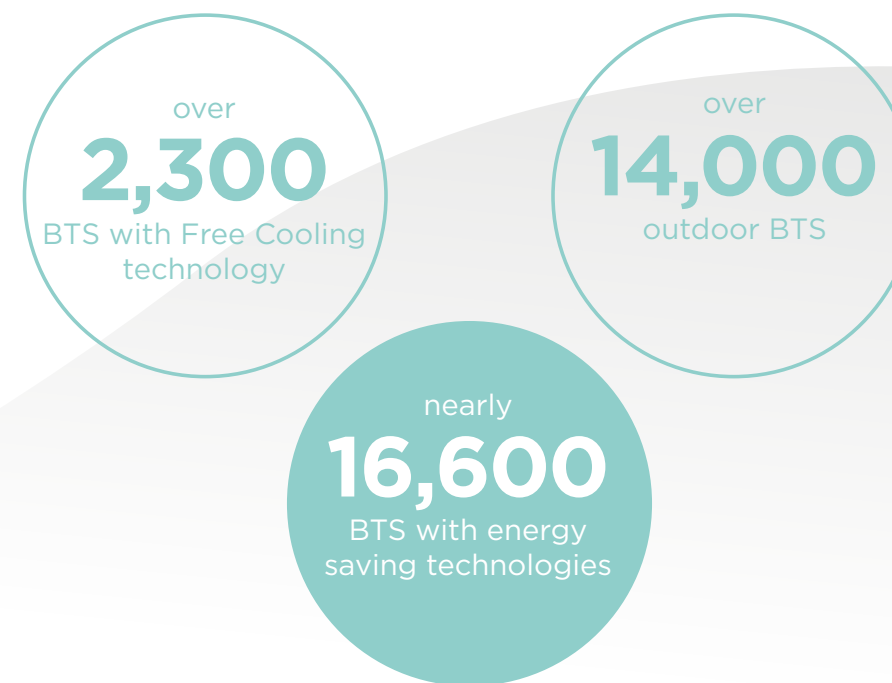
- Replacing **mobile radio network equipment** with the latest generation energy-efficient equipment.
- Equipping **apparatus subject to variable operational load** with increasingly advanced energy-saving functions.

- Upgrading the **infrastructures** in which the equipment is housed with external configurations with lower energy cooling requirements.
- Consolidating and centralising **technological sites of the Wind and Tre networks** to reduce direct and induced consumption.
- Equipping **radio base stations** and large power stations with **Free Cooling**. This innovative cooling system is based on the use of external air to cool the equipment and reduce the consumption of air conditioners by conveying hot air to the outside. It also extends the life of the air conditioners and drastically reduces maintenance.

Base Transceiver Stations (BTS) are the infrastructure for mobile telephony. These are devices with antennas that receive and transmit the radio signal for mobile phones within a specific geographical area, known as a **radio cell**. The energy saved by the BTS is mainly electricity from the domestic grid [GRI 302- 4b].

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

IMPROVING ENERGY EFFICIENCY: NO. OF RADIO BASE STATIONS (BTS) WITH ENERGY-SAVING TECHNOLOGY





Together with WWF for the climate

With the support of **WWF Italy** experts, WINDTRE has been analysing its carbon footprint and compiling an inventory of its emissions in scopes 1 and 2 since 2017. More than **90% of these emissions** are generated by the **electricity consumption** of the telecommunications network.

Since the beginning of the collaboration with WWF, WINDTRE has set a target to **halve its consumption per unit of traffic by the end of 2020** compared to 2016, and to stabilise its emissions in view of a large expected increase in traffic volumes generated by customers.

In the target year 2020, WINDTRE not only reduced its **emissions per traffic unit by more than 70%** compared to the base year, but also managed to **limit total emissions**, despite the exponential increase in traffic, thanks to energy efficiency measures.

From 2017 to 2020, the overall **reduction was more than 18%**, from 278,229 to 226.358 tons CO₂ eq.

Greenhouse gas emissions (tonnes of CO ₂ eq.)	2020	2019	2018	2017
Total emissions	226,358	234,124	241,002	278,229
<i>of which indirect</i>	<i>219,863</i>	<i>224,715</i>	<i>230,002</i>	<i>268,447</i>

Thanks to energy efficiency measures carried out since 2011, WINDTRE is also estimated to have **avoided emissions of more than 190 thousand tons of CO₂**. This calculation was made on the basis of **white certificates** obtained downstream of the process of modernization of business equipment since 2011.

[FIND OUT MORE IN THE APPENDIX](#) +

Again in collaboration with WWF Italy, WINDTRE is committed to safeguarding the **Mediterranean Sea**, defined as a climate “hot-spot” by the United Nations and a priceless heritage not only for Italy but for the entire planet. WWF’s **#GenerAzioneMare** campaign protects the Mediterranean Sea by preserving its **landscape** and the **animal species** that inhabit it, which are often threatened by human activities and water pollution.

By subscribing to the “**WINDTRE and WWF for the Mediterranean**” option, customers can donate 50 cents each month in support of #GenerAzioneMare. WINDTRE has pledged to **double the amount** donated and donate the entire proceeds to the protection of the most endangered species in the basin, such as the loggerhead sea turtle *Caretta Caretta*.

[SUPPORT THE GENERAZIONE MARE CAMPAIGN](#)

Every year in March, WINDTRE participates in **Earth Hour**, the largest global mobilisation organised by WWF to combat climate change. The day is dedicated to promoting sustainable lifestyles and involves more than **two billion people globally**. WINDTRE promotes the initiative to its customers and employees through a **dedicated web and social campaign**.

[JOIN THE EARTH HOUR](#)

Energy Supervisor

To also support its customers, starting from businesses and public administration, in their efforts to reduce emissions and energy consumption, in September 2020 WINDTRE launched the **Energy Supervisor** service: an ICT solution for the digital management of energy consumption and expenditure.

This new **digital monitoring** system, entirely available in the Cloud, leverages Data Analytics tools combined with the Internet of Things (IoT) to analyse energy data and environmental information and extrapolate targeted and customised reports, estimates and notifications. The service was developed in collaboration with Ouvert, Italy's leading energy performance analysis provider.

Energy Supervisor enables customers to **plan** energy efficiency measures in a more targeted way, identifying energy drivers and optimising performance.

The solution is available in three different formulas, one for each need:

- **Monitoring** - Includes monitoring, data collection and reporting of energy consumption.
- **Invoicing** - Enables the digitisation of the processes of verification and recalculation of energy supply invoices.
- **Analysis** - Prepares reports on financial and administrative indicators, to support planning for the energy budget.

CARING FOR THE ENVIRONMENT STARTS IN THE OFFICE

WINDTRE's drive to improve the **sustainability of the working environment** and reduce waste starts with **small everyday gestures**. To reduce its impact on the environment, WINDTRE continues to promote various initiatives in offices, such as:

- Installing **automatic on/off systems** for lights inside technical rooms.
- Replacing neon lights with LEDs in all company offices.
- 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.

To facilitate sustainable mobility, WINDTRE has **87 shared cars** (car-pooling), of which 7 full electric and 11 hybrid, which each employee can access through a **Corporate Car Sharing App**. In total, at the end of 2020 there were 63 electric or hybrid cars in the company car fleet.

SMART TECHNOLOGIES FOR THE ENVIRONMENT AND HEALTHCARE

Why it's important

20-40% the energy savings that can be achieved in a building thanks to smart technologies. [European Resource Efficiency Knowledge Centre, 2019]

161 million the number of IoMT (Internet of Medical Things) devices adopted worldwide in 2020. [Statista, 2020]

3.9% the reduction in global emissions resulting from the application of IoT to energy distribution networks. [Ericsson Research, 2020]

\$82 billion the market value of precision medicine 4.0 by 2025. [WEF, 2020]

Beyond 5G Trial: future and innovation

[GRI 103-1, 103-2, 103-3, 203-1, 203-2 a]

June 2020 saw the successful conclusion of pre-commercial trials on the 5G network in 5 Italian cities, launched in 2017 under the aegis of the Ministry for Economic Development through a specific call for tenders.

WINDTRE, in partnership with **Open Fiber**, had the chance to test its 5G technology in the cities of **L'Aquila and Prato**, supported by a rich ecosystem of businesses, universities and research centres.

THE CITIZEN AT THE CENTRE OF THE 5G CITY

The partnership for the 5G experimentation projects



The initiative was inspired by the “**5G City**” model, focusing on how digital innovation can contribute to a new way of interpreting and responding to the needs of communities, with the ultimate aim of **improving people’s quality of life**.

With this vision for the future, WINDTRE, Open Fiber and ZTE have decided to follow up on the first trial through the “**Beyond 5G Trial**” partnership, combining their expertise and infrastructure with the common goal of promoting and developing **innovative services with high social and economic value**. The agreement involves continuing to test different and additional service models within a broad ecosystem, open to universities, research centres and industrial partners.

WINDTRE also supported, as a corporate partner, the candidature of Rome for the MiSE tender “**Asse I - Casa delle Tecnologie Emergenti**” (Axis I - Home of Emerging Technologies), the programme to support projects relating to the application of 5G to next-generation goods and services in the regions involved in pre-commercial trials of 5G. To our great satisfaction, the five municipalities admitted to MiSE funding include all three cities in which the company is involved: **Rome, L’Aquila and Prato**.

5G Road – Smart City Smart Life

Also this year, WINDTRE took part in the packed week of virtual events at **Milan Digital Week**, the festival organised by the City of Milan in collaboration with IAB Italy, Cariplo Factory and Hublab. From 25 to 30 May, the initiative, which took place entirely online, focused on the theme of the “**City transformed**” by digital services, with round tables, webinars and conferences.

For WINDTRE, which has always seen digital transformation as **an opportunity to serve citizens** and the environment in which they live, it was a valuable opportunity to share its views on how technology will transform so many different areas of life in cities.

During **four live streaming events** promoted by WINDTRE, technology experts, scientists, journalists, start-uppers and entrepreneurs illustrated the opportunities of 5G and its importance for the Smart City and Smart Life of the future, touching on areas such as sustainability, smart working, education, culture, sport, inclusion, information and research.

Electromagnetic emissions

WINDTRE constantly and carefully monitors compliance with the limits laid down by law and all the analyses carried out to date on its plants confirm **electromagnetic emission values that are always lower than those established by Italian law, despite its particular restrictiveness compared to the one in other Countries in Europe** (6 V/m daily average value).

For new plants, as well as for existing extensions, **WINDTRE carries out preventive monitoring of electromagnetic emissions** to ensure that the overall level remains within those required by law. 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.

Moreover, as of 2015, WINDTRE publishes on the websites of the **regional ARPAs** the monitoring data of its installations to which the regulation of 12/12/2014², which requires the verification of the hourly and daily average power, applies.

WINDTRE is aware that the electromagnetism produced by its network raises concerns among the public, especially with the advent of new 5G infrastructures. For this reason, thanks to the support of the trade association **ASSTEL - Assotelecomunicazioni**, WINDTRE promotes the deepening 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.

Smart business solutions

Building on its technological know-how and aware of the disruptive impact that technologies can have in various sectors, WINDTRE has developed **new B2B (business-to-business) solutions** in 2020 to meet increasingly complex needs, such as those that emerged during the pandemic, such as the management of smart working, distance learning, social distancing and health.

As a result, WINDTRE has built up a new portfolio of 360° projects in partnership with start-ups and other ICT players:

- **Smart Working Package:** a complete suite of Connectivity, Security, Modem, Office Automation Software, including a personalised offer to work without limits on gigs and calls at a promotional price.
- **Easy Edu:** a simple and modular solution geared towards schools, which aims to support teachers in making optimal use of distance learning tools to guarantee the right to study for all students. Easy Edu is a suite of Fixed and Mobile connectivity, Security, Notebook, Software for sharing and distance learning, Office Automation and Cloud.
- **Body temp scanner & Access control:** the mobile solution that quickly scans the body temperature of every person entering a space, reducing the risk of contagion, in full compliance with Privacy legislation.

² 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).

- **Smart queue:** the crowd booking and management solution in commercial or public spaces, useful to prevent crowding. By choosing the point of sale, you can see the number of people in the queue and book from the comfort of your home, or on site. You will receive a notification of your turn.
- **Social Distancing & Contact Tracing:** the system that uses wearable devices to maintain the distance between people in the same environment.
- **Diagnostic health:** the digital health and telemedicine platform that allows the employer to easily book and have basic medical tests performed and to check the health situation within the company on a daily basis. The solution includes a remote workstation that performs the functions of a doctor's office, with a set of devices for measuring vital parameters, connected to a tablet application. This platform can be used to measure certain parameters such as blood pressure, ECG, temperature, oxygen level or weight independently. The data is then sent to a medical facility for evaluation.

WINDTRE has also developed additional solutions to support digital transformation:

- **Mobility and Retail Analytics:** the web dashboard designed for those involved in planning, management and analysis in the fields of mobility, tourism or commerce, 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.
- **LTE Private Networks:** designed to meet the connectivity needs of Industrial IoT applications, LTE Private Networks are designed and built taking into account the number and type of Industrial IoT business applications, their technological evolution over time and scalability requirements.

ActivAge

ActivAge is an E-Health project funded by the European Union with the aim of using open source and proprietary platforms to build **the first European IoT ecosystem in seven countries for large-scale deployment of solutions to monitor the health of people**, especially the elderly, in their everyday environments.

In concrete terms, ActivAge involves **doctors and patients** on the basis of a scientifically validated protocol defined at European level and, **using IoT devices** to monitor patients and their environments. The devices have different fields of application: some regard the **patient** directly, i.e. the course of the disease, behaviour inside and outside the home, changes linked to ageing and socialisation. Others look at **the environment in which the patient lives**, i.e. safety, comfort and the activation of emergency systems in the home. With the data collected, appropriately processed, analysed and recorded, ActivAge suggests **specific intervention and care strategies**.

The project, which started in 2016, was part of the **Horizon 2020** European funding and innovation framework. During 2020 and with the outbreak of the pandemic, new studies are being carried out at the invitation of the European Union to assess the **scalability of the ActivAge project** and its online ecosystem **ActivAge.org**, extending its functionality to **support pandemic management. Remote monitoring** via IoT can reduce emergency admissions and unscheduled specialist visits, benefiting both patients and their families and the healthcare system as a whole.

Private and public partners from different sectors are cooperating in the project, from health care to IT and home automation, from research to telecommunications. WINDTRE acts as a **technology partner**, participating in the design of the service and helping to identify and develop the best ways of analysing the data collected. The Emilia-Romagna Region, Cup 2000, Parma Local Health Unit, Aurora Domus Cooperativa Sociale Onlus, Isti - Consiglio Nazionale delle Ricerche, University of Parma, IBM Research are also taking part in the initiative.



LUCA MONTI
5G & IoT
Project Director
WINDTRE

“
The future lies in developing innovative services with high social and economic value.”

In 2020, we achieved a great success: the completion of the pre-commercial testing project on the 5G network, launched in 2017 in the Cities of Prato and L'Aquila under the patronage of the Ministry for Economic Development. This milestone marks the beginning of the development of a new model of “5G City” in which digital innovation will become an integral part of a new way of interpreting and responding to the needs of communities.

The challenge was to build a real ecosystem, one that we won by building an articulated network of partnerships which, together with Open Fiber, saw many companies, universities and research centres working side by side, all united by a vision, an ultimate goal: to improve people's lives.

The next challenge, which is undoubtedly more difficult and at the same time stimulating, will be to translate this experimental model into a project that is spread throughout the territory and accessible to all, thus bringing to fruition an ambitious vision of a Smart City in which the elimination of distances between people is accompanied by the progressive reduction of distances between people and innovative services.

OUR DNA



At the core of WINDTRE project there are continuous innovation, the ability to provide fast, reliable and top-quality network, and to put our customers and our people at the centre, always aiming for the highest integrity and ethics. These are the company DNA issues.

The issues that matter*:

- NETWORK RELIABILITY, INNOVATION AND COVERAGE
- CLOSE TO OUR CUSTOMERS
- CLOSE TO OUR PEOPLE
- ETHICS AND BUSINESS INTEGRITY

What it means to us

- These are **ESSENTIAL** themes for our activities.
- They are an integral part of our present and future commitment and are already key factors in our success.

** These issues have been considered essential, and have therefore been subtracted to the discussion with stakeholders. For the complete materiality analysis see page 98 and following.*

OUR 2020

Network reliability, innovation and coverage

- The **mobile network with the highest managed traffic** and access capacity available in Italy
- **€6 billion invested** in ICT infrastructure over 5 years
- **Nearly 100%** mobile outdoor network coverage
- **Edge-Computing, Network Slicing, Artificial Intelligence and Blockchain:** the main innovation levers on which WINDTRE has focused in 2020
- **Top Quality Network:** WINDTRE's network qualified as outstanding quality once again in 2020

Close to our customers

- **WINDTRE, the new single brand** launched in March 2020
- 79.7 out of 100 **overall Customer Satisfaction** (85.1 out of 100 loyalty)
- **Close at hand even from a distance:** WINDTRE's Customer Service never stopped even during lock-down, continuing to provide support to all customers

Close to our people

- **6,821 people, 48% of whom are women**, and 41 new talents recruited in 2020
- **Top Employer Italia** for the third year running: the award for excellence in Human Resources management was confirmed for 2021
- **NESSUNA DISTANZA** (no distance): a virtual place of sharing and solidarity during the lock-down, while all WINDTRE people were working from home
- **Welfare4Me:** a new section of the Intranet entirely dedicated to employee welfare initiatives

Ethics and integrity in business

- 250 due diligence on Business Partners in 2020, to ensure that they endorse our values and integrity, starting with the **fight against corruption**
- **Health and safety at work:** a constant commitment to comply with all legal obligations
- **A Whistleblowing procedure**, to make reports safely

NETWORK RELIABILITY, INNOVATION AND COVERAGE

WINDTRE invests in infrastructure expansion and continuous improvement of the network, to promote ultra-wideband and the launch of the 5G network, the great enablers of digital transformation and Industry 4.0.

Technology and coverage [GRI 103-1, 103-2 e 103-3]

Technology and the digital network are increasingly important tools in the daily lives of people and organisations. WINDTRE's efforts and investments in ICT infrastructures, **€6 billion over 5 years**, have made it possible to consolidate a reliable, quality network ready to accommodate the latest technologies.

Network reliability, innovation and coverage targets are set to ensure a high standard of quality and are monitored by a **Network Operation Centre (NOC)**, a constantly active control centre. This system has also allowed us to easily manage the increase in traffic due to the lock-down periods of 2020: at the end of December, the intensity of traffic carried on WINDTRE's fixed and mobile networks saw an **increase of 22% and 16% respectively**, compared to estimates made pre-Covid-19.

In December 2020, WINDTRE completed the consolidation and upgrade of the **radio access network**, resulting from the integration of WIND and H3G networks into a single converged and

5G-Ready network, able to ensure the best connectivity and quality of service.

5G is emerging as an enabler of the digitisation of society and the economy. The rapid evolution of its application models suggests that its innovative scope will mean not only an increase in transmission speeds, but a real **digital reconfiguration** of many different aspects of daily life and human activities.

In 2020 alone, some **€766 million** will be invested in technological infrastructure as part of the modernisation and consolidation of the 4G network and the launch of the new 5G network, which is essential to meet the growing demand for access to the digital network and to enable connectivity 4.0, that which links machines, mobile devices and software with the Internet of Things.

5G FDD (Frequency Division Duplexing)¹ coverage of 74% of the population was achieved in the second half of 2020 and is expected to reach **100%** by Q1 **2021**. **The roll out of 5G TDD** (Time Division Duplexing)² coverage also started in late 2020, with the first 730 5G sites activated.



WINDTRE's **outdoor mobile network coverage** level is currently **close to 100%** in terms of population reached, with 99.9% for 2G (GSM), 99.5% for 3G (UMTS/HSPA), 99.6% for 4G (LTE) respectively.

On the **fixed network**, WINDTRE offers a capacity of approximately **3.5 million lines** in almost **2,000 sites**. The main owner of the Italian fixed telephone network is TIM, which provides other licensed operators with the means to access specific levels of interconnection¹. WINDTRE has an interconnection level of approximately 32 GW IP, which gives it access to:

- Carrier Selection services, which allow customers to access the services of any other telephone operator;
- Wholesale Line Rental services, by which TIM offers other operators wishing to offer traditional telephone lines to their customers the possibility of completely managing the commercial aspect under their own brand;
- BS Ethernet, a family of computer network technologies commonly used in local area networks (LAN), metropolitan area networks (MAN) and wide area networks (WAN).

WINDTRE has continued to invest steadily in **fiber optics** by activating ultra-wideband services and technologies (FTTH-FTTC), thanks

to agreements with wholesale partners. By 31 December 2020, WINDTRE had reached 1,042 municipalities using FTTC technology and 229 municipalities using FTTH technology. In terms of transmission network, for fixed and mobile lines, WINDTRE is able to manage all the traffic of the high-speed fiber optic network backbone on its own infrastructure.

WINDTRE's commitment to ensure maximum **reliability and connection quality** has been **Top Quality Network** certified since 2019 and during 2020 has been confirmed by other prestigious national and international awards.

In September, **Ookla**, a global leader in testing applications and data analysis for fixed and mobile networks, awarded WINDTRE the **"Speedtest Award"** as the **fastest mobile network in Italy**. Ookla compared the results of over 7,000 tests carried out by customers in Italy and calculated the **"Speed Score"** of each operator. WINDTRE's network obtained the best performance in terms of **speed**, with an average value of **44.43 Mbps** in download and **13.15 Mbps** in upload, totalling a combined Speed Score of 43.92, **the highest recorded in Italy**.

Another important recognition came in July 2020 from the independent analysis company **Opensignal**, which awarded WINDTRE with the nomination of the **Fastest Mobile Network in Italy for download and upload** and recognised it as first place in the rankings with equal merit for **"Video Experience"** and **"4G Coverage Experience"** performance.

¹ 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. Frequency Division Duplex (FDD) means that the radio transmitter and receiver operate on different frequencies.

² 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 Duplex (TDD) separates outgoing and incoming signals.

³ In order for subscribers of different fixed and mobile network operators to communicate with each other, the networks must be interconnected, so operators must enter into interconnection contracts regarding the provision of origination, fixed and mobile termination, and transit services.

Capacity for innovation

[GRI 203-2 a]

In 2020, WINDTRE focused on **Edge-Computing, Network Slicing, Artificial Intelligence and Blockchain** as the main levers of innovation, exploring new and improved solutions able to respond to the new challenges that emerged with the **Coronavirus** pandemic, but also to generate new **development opportunities**.

During the year, we experimented with new application paradigms based on the use of **Edge computing** to improve the performance of computational resources available in the area. This is a **network of micro data centres** capable of delivering high-value computing services locally while reducing latency times for solutions in sectors such as **automotive** and **energy networks**.

The **virtualisation of WINDTRE's network**, i.e. separating network services from the underlying hardware and pooling physical network resources, will enable **Network Slicing** services. Network slices are network segments that share the same transport and **physical access infrastructure** and support **different applications** with specific characteristics and requirements. A single network can have multiple 'Slices', each dedicated to specific services or customers. Network virtualisation makes it possible to automate various activities, become more **flexible** and optimise the **allocation of resources** according to the performance required, while also ensuring greater efficiency in terms of **electricity consumption**.

During the year, the company introduced new tools related to **Artificial Intelligence (AI)**: a system (software and/or hardware) that can analyse its environment and act accordingly with a certain degree of autonomy. Applied to telecommunications networks, AI is fundamental not only for managing the control of network elements, but also for continuing to devise new solutions for citizens as part of the evolution of Smart Cities, such as managing multi-utility networks (energy, water, waste). Finally, 2020 saw the implementation of initiatives and projects based on **Blockchain** technology, the **virtual ledger** that publicly tracks all user transactions. This technology is progressively being integrated into the world of **telecommunications, finance** and **administration**. WINDTRE is also constantly working with its partners to define **new methods of integrating Blockchain** technology into organisational processes, to streamline internal operations and to develop innovative potential technology ecosystems.

Horizon 2020 projects

WINDTRE participates in a number of innovation projects as part of the European Union's Horizon 2020 initiative. Some of the most significant projects include

- **ICT4Cart**: the **assisted and autonomous driving** solution based on the integration of Mobile Edge Computing technology (MEC server) with LTE and 5G networks.
- **ActivAge**: the European IoT ecosystem for large-scale deployment of solutions for monitoring the health of people, especially the elderly, in their daily life environments.
- **5GMeta**: the **open-source platform** to make all data from road vehicles available for road safety management through the so-called NetApps (Network Applications) also implementing digital-twin solutions; i.e. to use vehicle data to simulate vehicle behaviour in all possible situations avoiding field tests.
- **Braine**: the **Artificial Intelligence** 'brain' that receives data, processes it and coordinates the platform's operations, supporting its performance and protecting its security.
- **SMART5GRID**: the European consortium responsible for studying the possible synergies between 5G and the energy distribution network, to increase the quality of supply, improve the speed of repair of network faults and promote service continuity.



CLOSE TO OUR CUSTOMERS

WINDTRE is constantly striving to offer an outstanding Customer Experience and to enhance its customer relationships based on reliability and transparency.

Communication channels

[GRI 103-1, 103-2, 103-3]

The quality of a telecommunications service also depends on an operator's ability to **dialogue with customers**, responding to their questions and expectations at every stage of the relationship: before a purchase, when establishing the commercial agreement, while the supply relationship is under way, when any problems occur or communication needs and habits change, right up to the stage of closing the contractual relationship.

As of 6 March 2020, WINDTRE replaced the wind.it and tre.it **websites**, which described the offers and how to activate the various services, with the new **windtre.it** and **verymobile.it** websites. These websites also provide access to the **Selfcare Area**, where customers can find useful information, such as their activated rate plans and traffic usage. From the Selfcare Area, like the App, consumer customers can also receive assistance through a **virtual agent**.

In 2020, moreover, WINDTRE has decided to adopt **Asynchronous Chat** as the new and main digital channel dedicated to customer assistance, replacing social networks. This new channel is more immediate for the customer as it is located directly in the web pages/apps they visit, making it much more immediate to use than the traditional telephone channel. During its first

year of adoption, the success of Asynchronous Chat is also highlighted by the fact that **90% of customers who used it did not need to contact customer service again over the following days**.

Customer Care is a fundamental element in WINDTRE's marketing and commercial strategies: in fact, careful management makes it possible to maintain customer confidence over time, promoting the growth and development of the operator itself.

Right from the initial stages of the health emergency, in February 2020, we rapidly implemented a major **remote working** project for all Customer Service employees, who were able to continue to support customers even during periods of generalised lock-down.

Customer Satisfaction

Once again in 2020, WINDTRE measured **Customer Satisfaction** on a scale of 10 to 100 through market-specific telephone interviews carried out by an independent external company on a representative sample of customers. The overall result was a **customer loyalty** of 85.1 for WINDTRE⁴ customers and 93.6 for Very Mobile⁵ customers, with an **overall satisfaction** of 79.7 for WINDTRE and 88.2 for Very Mobile.

FIND OUT MORE IN THE APPENDIX +

⁴ WINDTRE includes Wind, TRE and WINDTRE.
⁵ Monitored from 4Q20.

Premium Services

VAS (Value-Added Services), also known as **Premium Services**, are services that are added to the basic telephony services for an extra charge (e.g. music, games, horoscopes and ringtones, etc.). VAS services are produced and promoted by third parties (Content Service Providers) but are charged to the end customer by the telephone operator.

With the **Premium Services Self-Regulation Code**, a series of rules have been agreed upon between telephone operators, premium service providers and consumer associations, aimed at protecting the consumer and creating a safer and more aware Customer Experience.

WINDTRE has so far countered the unsolicited sale of overpriced services with various countermeasures, including implementing refund and **caring policies** in the event of a service dispute and introducing specific purchase guidelines that are more restrictive than those provided for by the relevant regulations and aimed at guaranteeing informed purchases.

With AGCOM's Resolution no. 10 of 2021, as of 18 April 2021, WINDTRE will automatically activate a **block of premium rate services** on all pre-paid and post-paid mobile numbers. It will also automatically deactivate any premium rate subscriptions that may be active unless the customer expressly requests to keep them.

Informati e sicuri (Informed and safe)

Always attentive to the digital security of its customers, WINDTRE also launched the "**Informati e Sicuri**" service in 2020. This is a **freephone number** (800 900 134) dedicated to safe surfing, where customers can report issues related to **Premium rate services (VAS)** and **cybersecurity** to Customer Care operators. The initiative was created with the aim of being ever closer to customers, so that they can browse with the fastest network without fear of nasty surprises.

The pursuit of shared solutions

In the event of disputes 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. Trends in settlement and dispute outcomes remain positive.

DISCOVER THE WINDTRE SERVICE CHARTER ON www.windtregroup.it



CLOSE TO OUR PEOPLE

WINDTRE promotes the well-being of the people who contribute to its success every day, promoting work-life balance, valuing diversity and equal opportunities, training and protecting the health and safety of workers.

The WINDTRE team

[GRI 102-41, 102-8 e, 102-8 d]
[GRI 103-1, 103-2, 103-3]

At 31 December 2020 WINDTRE had **6,821** employees, **48%** of whom were **women**. During the year the recorded **turnover** rate, both spontaneous and facilitated, fell slightly compared to the previous year. Almost **all employees have a permanent contract**, in line with previous years, and 80% of employees have a **full-time** contract.

All company employees are covered by an **employment contract negotiated with the trade unions** and the characteristics of the company's population do not fluctuate throughout the year as WINDTRE's activities are not subject to significant seasonal variations. **Non-employees**, who make up a small minority of the total, are mainly sales consultants in WINDTRE Retail brand shops.

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 **5,076 questionnaires collected** and a participation rate of **78%**, the #diciamolanostra survey in November 2020 recorded a significant improvement in all the categories surveyed, both compared to past years and to external benchmarks (161 Italian Top Companies), placing WINDTRE in the **Top Companies in Italy for Employee Experience**, with an **Employee engagement rate of 93%**.

FIND OUT MORE IN THE APPENDIX 



Top Employer 2021

For the third consecutive year, the Top Employers Institute has rewarded WINDTRE's commitment to caring for its people, with the label of **Top Employer Italy 2021**. The certification is the official recognition of corporate excellence in HR policies and strategies oriented to the satisfaction of people and improve 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.

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.
- **WORK-LIFE 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.

In 2020 WINDTRE was also ranked by the German Institute of Quality and Finance among the **200 "Italy's Best Employers for Women"** and certified "**Top Job Best Employer**" among the top 300 employers in Italy for its corporate **culture**, the values it represents and the **career opportunities** it promotes.

Attention to our people

2020 was an extraordinary year given the health emergency that affected the whole world. Since March, WINDTRE has allowed all workers to **work remotely** and is committed to maintaining and updating the many **welfare** programs provided for its employees, always taking into account the evolution of their needs and requirements.

This aspect is fundamental for WINDTRE, not only to progressively improve the level of **wellbeing of people** within the organisation but also to achieve an ever greater **quality of dialogue** with employees.

During 2020, inspired by WINDTRE's Purpose, the **NESSUNA DISTANZA** (NO DISTANCE) Intranet platform designed to act as a social wall for WINDTRE people, were created. The platform aimed to spread the corporate values of Trust, Courage, Inclusion and Responsibility through a "**Value Journey**" that lasted from July to November 2020. During this uncertain and difficult time, the NESSUNA DISTANZA page, personally promoted by the **CEO** and **Top Management**, was animated by content from the personal and professional experiences of WINDTRE people and interviews with external figures.

Among the welfare programs, the initiatives intended for the employees and, in particular, the **employees' children**, hold a prominent position. These projects have the important objective of providing WINDTRE people with occasions and opportunities to help manage young children.

Through the company crèches located in the **Rome, Pozzuoli and Palermo** offices and the nursery schools in **Pozzuoli and Palermo**, WINDTRE offers employees a service that combines quality and flexibility while respecting the needs of children. The nurseries 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) and between 3 and 5 years (kindergarten). **A total of 30 children enrolled in the 2020 nursery school and 18 in the kindergarten.**

WINDTRE also normally provides employees with **summer camps** for their children between the ages of 6 and 13, contributing to the participation fee for up to two weeks, as a concrete help during the school closure period. With the support of dedicated and qualified staff, the camps offer areas for conducting educational, sports, leisure, and recreational activities. In 2020, the initiative changed to a **refund on spending** by the employee. **In total, 162 refunds were recorded.**

WINDTRE also helps its employees spread the cost of school textbooks with **School Vouchers**, which can be paid back in instalments deducted from the employees' pay cheques: **in 2020 this service was utilised by 219 employees.**

Finally, WINDTRE sponsors **#schoolreward**, a monthly award dedicated to children who have achieved excellent results in secondary schools during the school year. **In 2020, the award was received by 72 middle school students and 19 high school students.**

AL TUO FIANCO is a service designed to support those who have social assistance needs, for themselves or for a family member, by offering the support of **an expert within the network of public and private services.**

It is aimed at those who find themselves **facing difficult situations when caring for elderly or disabled family members** and provides support in finding and booking home care solutions or stays at care facilities, as well as providing information on bureaucratic procedures such as requests for accompaniment, disability and presidential accreditation. **In 2020 around 40 WINDTRE employees made use of this service.**

The **WINDTRE per Noi** platform makes a series of services available to employees to simplify their daily lives, such as consultations and online temporary shops and conventions throughout the country.



Also in support of family/work balance, there are dedicated services available to employees at the main offices such as changing rooms and showers, concierge services, physiotherapist and nutritionist.

Welfare4Me

The 2020 Welfare plan 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 aim, the **Trade Union Agreement of 24 June 2020** established a contribution of **€270** to be used by the end of 2021.

Since October, the new **Welfare4Me** section of the company Intranet has been available, with a wide range of benefits linked to family, leisure, wellness, health and shopping. Each employee was able to **customise the benefits package** according to their needs by choosing to transform the contribution into vouchers, which could 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 achieved were extremely satisfactory: out of around 6,800 WINDTRE Group employees, **98% were activated on the platform and 93% of the total credit available was disbursed.**

In 2020, WINDTRE also decided it was important to provide **additional insurance cover** over and above the current guarantees in the event of hospitalisation due to Covid-19 infection. The coverage, valid only for employees, from March until December 2020 was subsequently renewed and is still active.

Health and safety

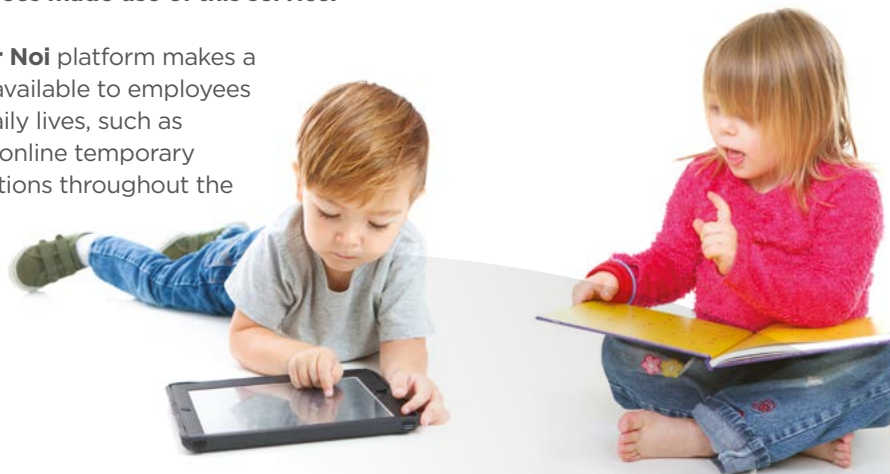
[\[GRI 403-2\]](#)

Occupational Health and Safety issues have always been a priority for WINDTRE and are also covered internally by a dedicated Management System that complies with the most widely recognised international standards on the subject. WINDTRE aims to constantly align itself with the most virtuous practices and progressively improve its health and safety results so that they exceed legal requirements.

For this reason, every year the Management analyses WINDTRE's performance with regard to the health and safety of workers based on all relevant indicators in order to make any corrective action or changes to the internal management system, with a view to continuous improvement.

During 2020, the pandemic situation obviously also affected the incidence of accidents, which decreased significantly compared to the past.

FIND OUT MORE IN THE APPENDIX



ETHICS AND INTEGRITY IN BUSINESS

In its activities, business relationships, corporate governance and sustainability, WINDTRE always ensures ethical conduct, guided by the principles of fairness and integrity, condemnation of corruption and compliance with the highest regulatory standards.

Governance instruments and management systems

[GRI 103-1, 103-2, 103-3]
[GRI 102-16]

WINDTRE is dedicated 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. It has therefore voluntarily set up a solid organisational structure designed to **ensure a correct and efficient system of corporate governance** and to protect the rights and interests of investors and all other stakeholders, always choosing to go beyond compliance with legal and regulatory requirements.

The **Code of Conduct** provides **behavioural guidelines** for the company's personnel while performing their day to day duties, thus strengthening the company's credibility and reputation within its operating context.

For each of the companies belonging to the Group, WINDTRE has adopted an **Organisation and Management Model pursuant to Italian Legislative Decree no. 231/01** setting out rules and control principles to prevent offences. WINDTRE has also appointed a collegial **Supervisory Body**, consisting of two external professionals and an internal manager, which has the task of supervising the adequacy and effectiveness of the model.

FIND OUT MORE IN THE APPENDIX 

WINDTRE in the fight against corruption and conflicts of interest

[GRI 205-2]

Since 2019, WINDTRE has been part of **Transparency International Italia**, the Italian branch of the largest global organisation for preventing and combating corruption. Taking inspiration from the organisation's best practices, in 2019 WINDTRE adopted an **Anti-Fraud and Anti-Corruption Policy** that defines the principles and ethical standards to be referred to in the management of business activities to mitigate risks and ensure compliance with current standards and laws.

WINDTRE has put in place a Due Diligence Procedure for Business Partners. Using an automated verification process, equipped with a **reputational risk assessment** system, WINDTRE analyses and selects all actors with whom it comes into contact, before establishing a business relationship. This process is based on the collection and verification of qualifications, skills and any links with public officials or other politically exposed persons. Approximately **250 due diligences** were carried out in **2020**.

WINDTRE has had a **Conflicts of Interest Policy** since 2017, signed through official declarations by all managers, collected and filed in a special **digital platform** on the Intranet. The Policy's Purpose is to provide guidelines to identify situations of actual, potential or perceived conflict of interest and to define the related communication and management process.

Management of warnings - Whistleblowing

[GRI 102-17]

WINDTRE's Whistleblowing Procedure sets out the process for receiving and managing reports of conduct that may represent a violation, even if only potential, of the Code of Conduct, the 231/01 Model, company procedures and regulations, as well as applicable laws and regulations.

The procedure provides for **several communication channels** (web platform, emails from the Supervisory Bodies, emails from the Director of Audit, Compliance 231 & Risk Management) aimed at employees and third parties, to **report**, also anonymously, potential **unlawful conduct**. The web platform is managed by an independent external company that is able to guarantee, by computerised means, the total confidentiality of the reporter (in compliance with Article 2 paragraph 3 of Law no. 197/2017).

The Director of Audit, Compliance 231 & Risk Management supervises and coordinates the process of managing the reports and, in the event of a violation, involves the necessary corporate functions, evaluating possible interventions based on the degree of severity of the violation.

ESG GOALS 2030:



OUR GOALS FOR A MORE SUSTAINABLE FUTURE

2020 was a decisive year in many ways. Among others, it also marked the start of a new countdown to achieving the United Nations' **17 Sustainable Development Goals** (SDGs).

Introduced in 2015 as part of the 2030 Agenda for Sustainable Development, the SDGs and their 169 targets helped define a universal plan of action for "people, planet and prosperity". To date, 193 countries around the world have integrated the 2030 Agenda into their policies and more than 70% of companies have included the SDGs in their business processes¹.

As early as 2018, WINDTRE started thinking about the **contribution that digital technologies and the ICT sector can make to achieving the goals of the Global Agenda 2030**: ICT solutions can significantly accelerate social, cultural, environmental and economic changes, representing an extraordinary enabling factor for the transformation envisioned by the SDGs.

In this context, WINDTRE believes that the best way to help society achieve these goals is by accompanying all citizens - from the youngest to the oldest - in the transition to a digital and interconnected society. This is the only way to unlock the real potential of ICT in terms of sustainable development: by **fostering the dissemination of the skills** needed to govern and constantly innovate technological solutions, and by **ensuring maximum protection** and prevention against the many risks this may entail. While ICT is not the solution in and of itself, with commitment and specific investments its proper use can have a targeted impact upon many of the specific problems highlighted by the goals.

¹ Ethical Corporation, *The Responsible Business Trends Report 2019*.

THE ISSUES THAT MATTER

[GRI 102-29, 102-44, 102-49, 103-1]

WINDTRE faces, and can play a role in, many challenges. This is why it is essential to **focus on priorities and concentrate our energy** in achieving our goals effectively.

2020 invited us to question global priorities. In response, WINDTRE has decided to refocus on the sustainability issues that matter most for the present and the future, as always together **with its stakeholders and its people**.

Taking inspiration from the most widespread non-financial reporting standards at global level, the company has redefined its materiality matrix. This tool allows us to put internal and external points of view side by side, **plotting the importance of each issue on two axes for stakeholders and for the company itself**, and highlighting the most significant ones for both.

Starting, therefore, from a broader reflection on the contribution that the sector can make to the achievement of the objectives of the 2030 Agenda, WINDTRE has identified 15 potentially relevant issues and by pooling the external and internal point of view, the 7 **key issues** around which to build the story and the path to sustainability.

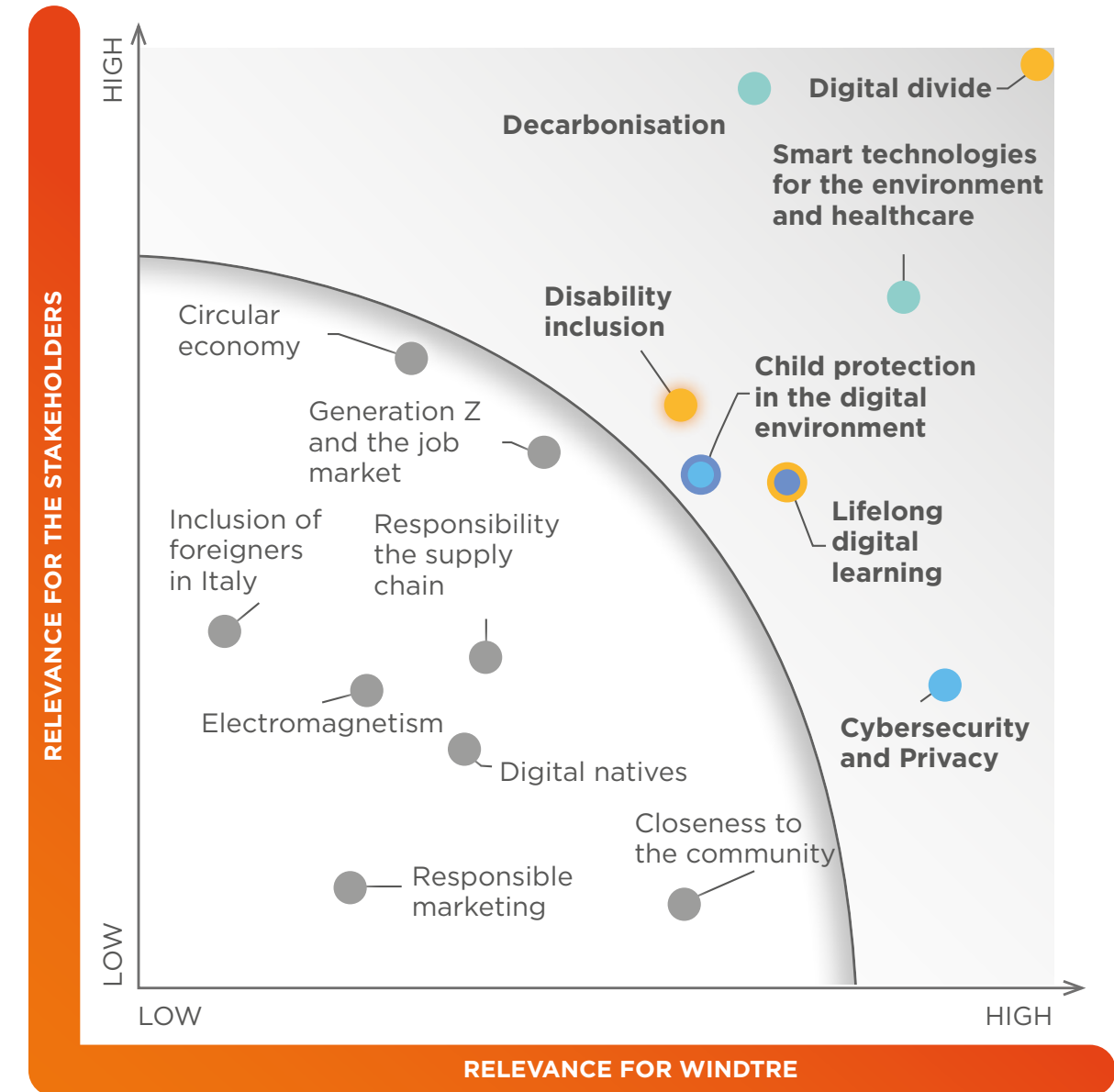
This experience represented also an opportunity to underline those sustainability issues that WINDTRE sees as its fundamentals. In other words, its DNA.

The network, the people, the relationship with customers, business ethics: these issues are essential for the performance of WINDTRE and are determining factors of its success.



Legenda

- Education
- Responsibility
- Inclusion
- Life



The “materiality matrix” graphically represents the match between the degree of relevance of a set of issues as identified by the stakeholders with the one identified by the company. The “issues that matter” for both categories are those that rank at the top right of the matrix.

SUSTAINABLE DEVELOPMENT GOALS



In September 2015 the United Nations General Assembly adopted the 17 Sustainable Development Goals (SDGs) with the resolution titled “Transforming our World: the 2030 Agenda for sustainable development”, and made an important promise: not to leave anyone behind.

THE ESG PLAN: A SHARED JOURNEY

The 2030 Agenda challenges us to come up with ideas and solutions to build a more sustainable and inclusive future over a 10-year horizon. It is not easy to look ahead at a time of such rapid acceleration and change.

The **ESG Plan 2030** photographs WINDTRE’s ambition and the objectives that will make a difference over the next 10 years. This path, starting by redefining the key issues, has led to establishing a long-term commitment for each of them. A path that starting from the contributions of stakeholders, has then intensely involved all areas of the company.

The path began with “stakeholder day”, in which 17 representatives of the different categories of **WINDTRE stakeholders** voiced their views by providing a unique contribution, thanks to their wealth of experience, expertise, values and relationships, and participated in **drafting a ranking of sustainability priorities** for the company.

28 WINDTRE managers, representing all areas of the company, then began a long process of listening and discussing at different levels of the organisation, in order to capture the full range of different points of view and create the basis for a widespread awareness of the role that WINDTRE can play in achieving the broader sustainability objectives of the global community.

The process also involved, among others, a selected group of “**under 30s**” - 15 young new recruits, who were asked to challenge the ideas put on the table, with all the freshness and enthusiasm of those at the beginning of their professional career.



THE 10 GOALS OF OUR SUSTAINABILITY PLAN


We exist in order to eliminate any distance between people.



1 By 2025
FAMILIES 100% AWARE

#Responsibility
#Education


Raise awareness among families, starting with children, and the customer base on how to use technology safely and responsibly.



2 By 2025
SENIORS 100% CONNECTED

#Responsibility
#Education

Actively contribute to the digital inclusion of older people by putting our Purpose into practice.



3 By 2025
PEOPLE 100% "FUTURE-READY"

#Education

Prepare WINDTRE's people for the challenges of the future by supporting their employability and investing in lifelong learning.



4 By 2025
100% SECURE COMPANIES

#Responsibility

Protect our Business customers by using our cybersecurity and data protection solutions.



5 By 2024
DIGITAL ACCESSIBILITY FOR PEOPLE WITH DISABILITIES

#Inclusion

Ensure that all information and customer support/assistance tools are easily accessible to people with disabilities.



6 By 2025
GENDER EQUALITY

#Inclusion

Ensure gender equality in access to growth, career development and remuneration opportunities by nurturing and maintaining an open and inclusive culture across different HR levers.



7 By 2025
CONNECTED VILLAGES

#Inclusion


Bringing fast connection and smart technologies to high potential Italian internal villages.



8 By 2030
SMART PARTNER OF 100 SMART CITIES

#Life

Support local authorities in transitioning their municipalities to smart and sustainable cities.



9 By 2030
100% CARBON NEUTRAL

#Life

Zero net CO₂ emissions.



10 By 2030
100% CLOSER

#Responsibility
#Education
#Inclusion
#Life

Imagine new ways of eliminating distances in everything we do, through WINDTRE ideas and solutions.

THE ORIGINS OF THIS DOCUMENT



The ESG 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 in Wind since 2003.

The information contained in this report refers to the 2020 financial year (1 January – 31 December), and is compared to the relative 2019 and 2018 information wherever possible. [GRI 102-51 and GRI 102-52]. Economic and financial data and key indicators are in line with the reporting package the company provides to its shareholder [GRI 102-1, GRI 102-45 and GRI 102-50].

This document has been prepared in accordance with the GRI Standards: Core option, which is considered the most widely used international standard for non-financial reporting today. [GRI 102-54]. The presence of content that meets the requirements of the GRI Standards is indicated in the text by a series of identification codes starting with "GRI" and appearing in square brackets.

In accordance with GRI Standards, the 2020 edition of WINDTRE's ESG Report has been built around the 7 material themes identified through the materiality analysis, a process that allows to establish a threshold beyond which a theme becomes sufficiently important to be reported. In particular, GRI defines material topics: those topics useful to represent the economic, environmental and social impacts generated by the organisation and, therefore, able to influence the decisions of its stakeholders and corporate strategies.

Within the four areas of work identified by WINDTRE to maximise its contribution to the Global Agenda 2030 - LIFE, EDUCATION, INCLUSION, RESPONSIBILITY - a shortlist of 15 potentially relevant issues was built and then submitted to stakeholders and management of the company. The 7 material issues were put into focus according to their significance and the assessment of their impact in the exercise of WINDTRE's activities and that perceived by 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 information collected and the relative contents reported in the ESG Report have been prepared in collaboration with all the people of WINDTRE, each for the activities of their own competence, constituting a complete and timely information flow that has ensured the soundness 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. For further details on the contents reported and the calculation methodologies, please refer to the **A year in numbers** section. The ESG Report is available on our website www.windtregroup.it. For any further information or clarifications you may require, please contact the WINDTRE CSR Department at the following addresses [GRI 102-53]:

Wind Tre S.p.A.
L.go Metropolitana, 5 – 20017 Milan-Rho, Italy
Via Cesare Giulio Viola, 48 - 00148 Rome, Italy

External Affairs & Sustainability
sustainability@windtre.it

FIND OUT MORE IN THE APPENDIX 

GRI content index – Core option

[GRI 102-55]

“Materiality Disclosures Service Organizational Mark”

For the Materiality Disclosures service, the GRI reviewed that the GRI Content Index is clearly presented and the references for Disclosures **102-40** to **102-49** align with appropriate sections in the body of the document. The Materiality Disclosures service was carried out by the GRI on the document written in Italian language.

GRI 101: 2016 Reporting Principles

GRI 102: 2016 general information



GENERAL INFORMATION

General information	Description	Chapter/section
ORGANISATION PROFILE		
102-1	Organisation name	Technical Appendix - Our DNA - Business Ethics and Integrity (p. 130)
102-2	Business, brands, products and services	Technical Appendix - Our DNA - Business Ethics and Integrity (p. 130)
102-3	Location of headquarters	Technical Appendix - Our DNA - Business Ethics and Integrity (p. 130)
102-4	Location of operations	Technical Appendix - Our DNA - Business Ethics and Integrity (p. 130)
102-5	Ownership and legal form	Technical Appendix - Our DNA - Business Ethics and Integrity (p. 130)
102-6	Markets served	2020, an unprecedented scenario (p. 10)
102-7	Scale of the organisation	Un Technical Appendix - Our DNA - Business Ethics and Integrity (p. 130)
102-8	Information on employees and other workers	Our DNA (p. 90) Technical appendix - Our DNA - Close to our people (p. 127)
102-9	Supply chain	Responsibility (p. 44) Technical Appendix - Responsibility (p. 122)
102-10	Significant changes to the organisation and its supply chain	Responsibility (p. 44)
102-11	Precautionary principle	Responsibility (p. 44)
102-12	External initiatives	Inclusion (p. 51)
102-13	Membership of associations	- 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. The Service Providers are no longer part of FUB's founding partners for reasons relating to the institution's compliance. FUB is an In-House foundation of the Italian Ministry of Education, Universities and Research (MISE).

General information	Description	Chapter/section
STRATEGY		
102-14	Statement from senior decision-maker	Letter to stakeholders (p. 3)
102-15	Key impacts, risks, and opportunities	2020, an unprecedented scenario (p. 10)
ETHICS AND INTEGRITY		
102-16	Values, principles, standards, and rules of conduct	Our DNA (p. 94)
102-17	Mechanisms for advice and concerns about ethics	Our DNA (p. 94)
GOVERNANCE		
102-18	Governance structure	Technical Appendix - Our DNA - Business Ethics and Integrity (p. 131)
102-22	Composition of the highest governance body and its committees	Technical Appendix - Our DNA - Business Ethics and Integrity (p. 131)
102-23	Chair of the highest governance body	Technical Appendix - Our DNA - Business Ethics and Integrity (p. 131)
102-29	Identification and management of the economic, environmental and social impacts	The issues that matter (p. 99)
STAKEHOLDER ENGAGEMENT		
102-40	List of stakeholder groups	Technical Appendix - How this document came about (p. 132)
102-41	Collective bargaining agreements	Our DNA (p. 90) Technical appendix - Our DNA - Close to our people (p. 127)
102-42	Identifying and selecting stakeholders	Technical Appendix - How this document came about (p. 132)
102-43	Approach to stakeholder engagement	Technical Appendix - How this document came about (p. 132)
102-44	Key topics and concerns raised	The issues that matter (p. 99) Technical Appendix - How this document came about (p. 132)

General information	Description	Chapter/section
REPORTING PRACTICES		
102-45	Entities included in the consolidated financial statements	How this document came about (p.104)
102-46	Defining report content and topic boundaries	Technical Appendix - How this document came about (p.132)
102-47	List of material issues	Technical Appendix - How this document came about (p.132)
102-48	Restatements of information	The data referring to years prior to 2020 have not changed with respect to those published during the previous years, with the exception of the data regarding the reduction of greenhouse gas emissions, which changed due to the updating of the conversion factors utilised.
102-49	Changes in reporting	During 2020 the company "materiality matrix" was updated. For further details please see the section "The issues that matter" at p. 98
102-50	Reporting period	The origins of this document (p.104)
102-51	Date of the most recent report	ago-20
102-52	Reporting cycle	The origins of this document (p.104)
102-53	Contact point for questions regarding the report	The origins of this document (p.104)
102-54	Claims of reporting in accordance with the GRI Standards	The origins of this document (p.104)
102-55	GRI content index	Technical appendix - GRI index (p.106)
102-56	External assurance	The 2020 Sustainability Report was not subjected to external verification.

SPECIFIC STANDARDS

DECARBONISATION

GRI 103: Management Approach 2016

103-1	Explanation of the material topic and its boundary	Life (p. 65)
103-2	The management approach and its components	
103-3	Evaluation of the management approach	

GRI 302: Energy 2016; GRI 305: Emissions 2016

302-1	Energy consumed within the organisation	Technical Appendix - Life (p. 116)
302-4	Reduction of energy consumption	Technical Appendix - Life (p. 116)
305-1	Direct (Scope 1) GHG emissions	Technical Appendix - Life (p. 116)
305-2	Energy indirect (Scope 2) GHG emissions	Technical Appendix - Life (p. 116)
305-5	Reduction of GHG emissions	Technical Appendix - Life (p. 116)

General information	Description	Chapter/section
SMART TECHNOLOGIES FOR THE ENVIRONMENT AND HEALTHCARE		
GRI 103: Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Life (p. 73)
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	Life (p. 73)
203-2a	Examples of significant indirect economic impacts, positive and negative, identified by the organisation	Life (p. 73)
LIFELONG DIGITAL LEARNING		
GRI 103: Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Education (p. 23)
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	Education (p. 23)
DIGITAL DIVIDE		
GRI 103: Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Inclusion (p. 51)
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 (p. 51)
DISABILITY INCLUSION		
GRI 103: Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Inclusion (p. 58)
103-2	The management approach and its components	
103-3	Evaluation of the management approach	

General information	Description	Chapter/section
GRI 203: Indirect Economic Impacts 2016		
203-1	Infrastructure investments and services supported	Inclusion (p. 58)
CYBERSECURITY E PRIVACY		
GRI 103: Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Responsibility (p. 35)
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
GRI 418: Customer Privacy 2016		
418-1	Substantiated complaints concerning breaches of customer Privacy and losses of customer data	Technical Appendix - Responsibility (p. 121)
CHILD PROTECTION IN THE DIGITAL ENVIRONMENT		
GRI 103: Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Responsibility (p. 41)
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
GRI 203: Indirect Economic Impacts 2016		
203-2a	Examples of significant indirect economic impacts, positive and negative, identified by the organisation	Responsibility (p. 41)
OUR DNA - NETWORK RELIABILITY, INNOVATION AND COVERAGE		
GRI 103: Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Our DNA (p. 84)
103-2	The management approach and its components	
103-3	Evaluation of the management approach	

General 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	Our DNA (p. 84)
OUR DNA - CLOSE TO OUR CUSTOMERS		
GRI 103: Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Our DNA (p. 88)
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	Technical appendix - Our DNA - Close to our customers (p. 123)
OUR DNA - CLOSE TO OUR PEOPLE		
GRI 103: Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Our DNA (p. 90)
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
GRI 401: Employment 2016; GRI 403: Occupational Health & and Safety 2016; GRI 404: Training and Education 2016		
401-1	New employee hires and employee turnover	Technical appendix - Our DNA - Close to our people (p. 127)
403-2	Hazard identification, risk assessment, and incident investigation	Our DNA (p. 63) Technical appendix - Our DNA - Close to our people (p. 127)
404-2	Programs for upgrading employee skills and transition assistance programs	Education (p. 28)
OUR DNA - ETHICS AND BUSINESS INTEGRITY		
GRI 103: Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Our DNA (p. 94)
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
GRI 205: Anti-corruption 2016		
205-2	Communication and training on anti-corruption policies and procedures	Our DNA (p. 95)

APPENDIX

A YEAR IN

NIU
MEMBERS



This Appendix has been drawn up as a supplement to the ESG Report 2020 di WINDTRE. It provides details on the methodologies used for data collection and for the calculation of the quantitative indicators, as well as some detailed information about the indicators themselves.

For any further information or clarifications you may require, please contact the External Affairs & Sustainability di WINDTRE at the following email address: sustainability@windtre.it

**CONTENT REFERENCES
OF THIS APPENDIX COMPARED
TO THE REPORT STRUCTURE**

LIFE ————— **116**

EDUCATION ————— **120**

RESPONSIBILITY ————— **121**

OUR DNA ————— **123**

CLOSE TO OUR CUSTOMERS ————— **123**

CLOSE TO OUR PEOPLE ————— **127**

ETHICS AND BUSINESS INTEGRITY ————— **130**

**THE ORIGINS
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LIFE

ENERGY CONSUMPTION

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

Activities and facilities consuming energy from fossil fuels by WINDTRE [GRI 103-1, 103-2 e 103-3]	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	

Energy consumption (GJ)	2020	2019	2018	GRI
Consumption of fuel from non-renewable sources	9,608	131,305	139,745	GRI 302-1a
Consumption of fuel from renewable sources	1,260	1,328	2,201	GRI 302-1b
Electricity consumed	2,864,670	2,927,882	2,955,123	GRI 302-1c i
Heating energy consumed	4,439	5,852	6,160	GRI 302-1c ii
Cooling energy consumed	n,d	n,d	n,d	GRI 302-1c iii
Steam consumed	0	0	0	GRI 302-1c iv
Total	2,960,977	3,066,366	3,103,229	GRI 302-1e

Greenhouse gas emissions (Tonnes of CO ₂ eq.)	2020	2019	2018	GRI
Direct (Scope 1)*	6,494	9,409	10,010	GRI 305-1a-b
Indirect location-based (Scope 2)**	219,863	224,715	230,992	GRI 305-2a-c
Total	226,358	234,124	241,002	

*, ** Data on biogenic emissions (Scope 1) [GRI305-1c] and indirect market-based emissions (Scope 2) are not available.

ENERGY EFFICIENCY PROJECTS

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

(*) do not include sites in Cellnex/Galata hospitality; 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

Energia risparmiata (GJ)	2020	2019	2018	GRI
Energy saved	26,105	49,240	84,088	GRI 302-4a

Greenhouse gas emissions (Tonnes of CO ₂ eq.)	2020	2019	2018	GRI
For the improvement of energy efficiency (Scope 2)	2,065	4,214	7,197	GRI 305-5

METHODOLOGICAL NOTE

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 company Galata S.p.A. (now Cellnex) for services offered to WINDTRE.

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.”

Energy saved

The energy saved is calculated based on the energy efficiency certificates (TEE) that reached maturity during the year in question for the modernisation and efficiency improvement activities carried out upon the Base Transceiver Stations (BTS), which have been in progress since 2012 [GRI 302-4 d]. The conversion factor utilised was equal to 2,752kWh (9.9 GJ) for each TEE. Up until 2017, the calculation of the energy saved was based on the year that the TEEs were obtained, rather than the year they reached maturity. As a result, the 2017 values included in the previous reports were recalculated based on the new criterion.

Greenhouse gas emissions

[GRI 305-1 g GRI 305-2 g]

- Since the approach for the consolidation of Scope 1 and Scope 2 emissions is financial and operational control, all the emissions of

WINDTRE’s subsidiaries are attributed to WINDTRE itself GRI 305-1 f GRI 305-2 f

- 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: (air conditioning unit/refrigerator refills)
 - The calculation of the Scope 2 (indirect) GHG emissions includes the emissions from the company’s indirect energy consumption. In particular:
 - Electricity consumption
 - Consumption related to district heating
 - Consumption related to district cooling
 - Consumption related to the purchase of steam

In particular, for the calculation of greenhouse gas emissions, the organisation considers the sum of CO₂ plus emissions of other gases (e.g. CH₄ and N₂O) expressed in CO₂ equivalent.

- The GWP utilised for CH₄ is equal to 21, while for N₂O it is equal to 310. GRI 305-1 and GRI 305-2 and
- For the calculation of indirect greenhouse gas emissions from fuel, emission factors (kg of CO₂ equivalent emitted on the volume of fuel consumed) under the Green House Gas Protocol.

In particular, for the calculation of indirect emissions from electricity, the emission factor (gCO₂ emitted per kWh used) is 276.3 gCO₂/kWh for 2020, 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		
		2020	2019	2018
Electrical consumption	g CO ₂ /kWh	276,3	276,3	281,4
Diesel, heating, generation, haulage	g CO ₂ /Litre	2,65	2,65	2,65
Natural gas, heating and haulage	t CO ₂ / Stdm ³ *10 ³	1,972	1,972	1,972
Petrol	g CO ₂ /Litro	2,38	2,38	2,38

The conversion factors for electricity consumption are derived from Table 2.4 of the ISPRA publication - Emission factors for electricity production and consumption in Italy, 2020. The emission coefficient of electricity consumption is determined from the generation

percentages of Italy’s electricity production over the years. The value reported for 2020 is an estimate. The values reported for 2019 and 2018 have been updated according to the most recent and therefore most accurate version of the ISPRA report.

Packaging efficiency

Over the past two years, WINDTRE has continued to reduce the use of paper and plastic for packaging. In 2020, the reduction in

promotional material was mainly in the use of paper.

Materials used by weight (tons)	2020	2019	2018
Plastic	41,16	44,5	118,17
Paper	395,03	511,9	1021,18

EDUCATION

[GRI 402-2]

Training (hours)	2020	2019	2018
Total training	107,745	108,435	93,293
of which health and safety training	20,490	26,885	16,109
Average training per person	15,6	15,7	13,4

Neo-connections - classes involved	a.y. 2020-21	a.y. 2019-20	a.y. 2018-19
Primary school - No. of classes involved	5,140	<i>digital edition</i>	3,750

(* since 2018, the supervisory process has been carried out starting in July of the year in question, and ends after a calendar year (June of the following year). The exported data for 2018 are for a six month period.

RESPONSIBILITY

[GRI 418-1]

Data protection

Inspections by the Data Protection Authority (no.)	2020	2019	2018
Number of inspections	0	1	2

Processings (no.)	2020	2019	2018
Register of treatments	154	170	150

Privacy-related checks on suppliers (no.)	2020	2019	2018*
On-site audits	13	6	6
Verification questionnaires administered to external suppliers	321	614	118
Verification questionnaires administered to sales agents	593 + 5,424 questionnaires at WINDTRE sales outlets	180	724

TOTAL QUALITY MANAGEMENT

The supply chain

[GRI 102-9 and 102-10]

Fornitori	2020	2019	2018
Qualified suppliers (no.)	891	736	410
Qualified suppliers located in Italy (no.)	827	660	365
Active suppliers (no.)	891	736	410
Amount ordered (in millions of €)	1,830	2,174	1,987

Disputes with suppliers (no.)	2020	2019	2018
Number of disputes with suppliers	4	5	5

OUR DNA - CLOSE TO OUR CUSTOMERS

[GRI 417-3]

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

Communication channels

With the launch of the WINDTRE brand, customer contact numbers have been merged into a single number.

In addition, a dedicated number for VeryMobile customers has also been introduced.

The new customer numbers are:

- 1928: WINDTRE BUSINESS
- 139: 3 Business
- 159: WINDTRE fixed and mobile
- 1929: VeryMobile

WINDTRE contact centers:

- 8 for WINDTRE BUSINESS and 3 Business customers
- 15 for WINDTRE and VeryMobile customers

Customer Care

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, and the customer service's Net Promoter Score. 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.

Servizio di assistenza al cliente		2020	2019	2018
Contact by telephone (no.)	WINDTRE BUSINESS 3 Business"	1,351,045	1,531,256	1,829,907
	WINDTRE VeryMobile	20,863,116	26,925,442	36,424,497
	Total	22,214,161	28,456,698	38,254,404
Support requests received by the specialised technical assistance groups (no.)	WINDTRE BUSINESS 3 Business"	313,891	348,053	348,487
	"WINDTRE VeryMobile"	3,022,218	3,452,840	4,377,023
	Total	3,336,109	3,800,893	4,725,510

Customer satisfaction

In 2020 the company once again measured its level of customer satisfaction on a scale of 10 to 100 by conducting telephone surveys specific to each market, carried out by an independent external company. The survey was conducted

on a quarterly basis with 1,000 interviews of Mobile Consumer customers, using a sample of customers by geographic area, type of contract (pre-paid or subscription), nationality, data usage mode, and contract duration.

Results of the Mobile Consumer Customer Satisfaction analyses (Scale from 10-100)	WINDTRE			VERY MOBILE		
	2020	2019	2018	2020	2019	2018
Overall satisfaction	79,7	77,8	79,2	88,2	77,7	76,1
Rates	79,4	76,1	78,3	92	79,1	77,7
CVM	73,1	70,1	75,2	84,5	73,3	70,6
Customer Care Services	72,7	75,8	76,5	81,5	77,4	74,7
IVR - Interactive Voice Response	68,1	73,5	72,5	75,5	74,6	69,7
Call Centre operator	77,7	79	79,5	83,3	79,9	78,2
Customer loyalty	85,1	82,4	83,6	93,6	82,3	81,7
Tendency for "word of mouth" recommendations	78,6	77,9	80,1	88,3	77,4	75,6
Advertising effectiveness	80,6	80,5	80,1	86	77,5	76,5

The pursuit of shared solutions

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

Consumer Association Complaints ¹ and Joint mediation requests		2020	2019	2018
Complaints from Consumer Associations (no.)		6,070	7,032	7,056
Joint mediation requests (no.)		3,667	4,204	3,764
Claims managed ² (no.)		3,671	4,011	3,723
Claims with a positive outcome	n.	3,465	3,751	3,482
	%	94%	94%	94%

Litigation with customers		2020	2019	2018
Pending as of 31/12/19		13,339	13,206	12,131
Favourable judgements (%)		72%	68%	66%

¹ The complaints from consumer associations have only been recorded since 2017; this is to ensure compliance with the new legislation, which entails the obligation for a written complaint to be submitted through consumer associations in order to gain access to joint mediation. The number of claims actually handled has also only been recorded since 2017.

² The claims handled also refer to those received in 2017 that were handled and closed in 2018.

OUR DNA - CLOSE TO OUR PEOPLE

[GRI 102-8, 102-8, 102-41]

The following personnel figures for 2020 refer to the companies Wind Tre S.p.A., Wind Tre Italia S.p.A., 3Ietronica Industriale S.p.A., WINDTRE Retail and CKHNI. The same scope was considered for 2019 and 2018.

As of 31/12/2020, WINDTRE's total work force amounted to 6,821 individuals. During the year, the recorded turnover rate, both spontaneous and facilitated, decreased slightly compared to the previous year's staff optimisation rate.

In keeping with the previous years, almost all of the employees have the open-ended contracts. 80% of the employees have full-time contracts. Part-time contracts are mainly requested by female workers.

48% of the company's workforce consists of women.

All of the company's employees are subject to a collective labour contract negotiated with the union organisations.

The characteristics of the company's population do not fluctuate throughout the year as WINDTRE's activities are not subject to significant seasonal variations. Non-employees, who make up a small minority of the total, are mainly sales consultants in WINDTRE Retail brand shops. In terms of breakdown by contractual level, the workforce's consistency remains in line with the previous years.

Distribution of employees by contract duration (no.)	2020			2019			2018		
	Men	Women	Totale	Men	Women	Totale	Men	Women	Totale
Open-ended	3,516	3,301	6,817	3,601	3,350	6,951	3,641	3,239	6,880
Fixed-term	2	2	4	3	3	6	5	2	7
Total	3,518	3,303	6,821	3,604	3,353	6,957	3,646	3,241	6,887

Changes in the workforce (new hires and terminations) [GRI 401-1]	2020	2019	2018
New hires (no.)	41	120	85
Terminations (n.)	177	294	289
Change (%)	2.59%	4.23%	4.20%

Distribution of employees by work hours (no.)	2020			2019			2018		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Full-time	3,316	2,107	5,423	3,381	2,109	5,490	3,463	2,176	5,639
Part-time	202	1,196	1,398	223	1,244	1,467	183	1,065	1,248
Total	3,518	3,303	6,821	3,604	3,353	6,957	3,646	3,241	6,887

Incidence of non-employee workers (%)	2020	2019	2018
Non-employees / Employees	1.32%	1.75%	2.80%

Distribution of the workforce by contractual level	2020		2019		2018	
	Total (no.)	%	Total (no.)	%	Total (no.)	%
White collar	6,008	88%	6,133	88%	6,307	88%
Supervisors	667	10%	681	10%	695	10%
Management	146	2%	143	2%	155	2%
Total	6,821	100%	6,957	100%	6,887	100%

Female incidence by contract level (%)	2020	2019	2018
White collar	51%	51%	50%
Supervisors	26%	26%	25%
Management	26%	23%	22%
Total	48%	48%	47%

Injury rate per million hours worked (no.)	2020	2019	2018
Employees (during work)	1.4	2.7	1.5
Suppliers (during work)	0.7	0.7	0.5
Employees (during travel)	1	4.7	3.7

OUR DNA - ETHICS AND INTEGRITY IN BUSINESS

Governance instruments

[GRI 102-1, 102-2, 102-3, 102-4, 102-5, 102-6, 102-7]

The Group's registered offices and main operational headquarters are located at no. 5 Largo Metro, Rho (MI) Italy [GRI 102-3]. The company also has another large operational facility at no. 48 Via Cesare Giulio Viola, Rome, Italy. 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. [GRI 102-5]. WINDTRE, in turn, wholly owns the companies CK Hutchison Networks Italia S.p.A., Wind Retail S.r.l., 3Lettronica Industriale S.p.A. and MISAR S.r.l., while it has some minority interests in other companies.

WINDTRE subsidiaries and affiliates as at 31.12.2020	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%
CKH Networks Italy S.p.A.	Italy	100%
MISAR 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%
QXN società consortile	Italy	10%

[GRI 102-18, GRI 102-22, GRI 102-23]

The Wind Tre S.p.A. Board of Directors consists of six members:

- Fok Kin Ning Canning (Chairman);
- Jeffrey Alan Hedberg (CEO);
- Christian Nicolas Roger Salbaing (Board Member);
- Frank John Sixt (Board Member);
- Edith Shih (Board Member);
- Stefano Invernizzi (Board Member).

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 Italian Civil Code.

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 two 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 meeting has not resolved any form of compensation.

THE ORIGINS OF THIS DOCUMENT

Our stakeholders

[GRI 102-40, 102-42, 102-43, 102-44, 102-46, 102-47]

WINDTRE's relationships with the people and organisations 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 following image shows WINDTRE's stakeholders grouped into categories.

The company maintains regular relationships and dialogues with its stakeholders. The contact takes place in different ways, and at different frequencies, depending on the categories concerned. Some initiatives are organised

specifically in view of the ESG Report and the Integrated Management System. In 2020, a structured process of listening to stakeholders was launched, involving them directly in the construction of scenarios and solutions to outline WINDTRE's ESG Plan to 2030 and contribute to the achievement of the goals of the Global Agenda. 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 2020, and the topics that are most important to each stakeholder category. The stakeholders to be engaged in the initiatives were selected based on their importance to the activities performed by the company.

Stakeholders	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)" 	Reduction of CO ₂ emissions Energy savings Consumption of clean and renewable energy	<ul style="list-style-type: none"> WINDTRE in partnership with WWF Italia for the assessment of CO₂ emissions and for energy saving initiatives GenerAzione Mare
Shareholders and bondholders <ul style="list-style-type: none"> CK Hutchison Ltd and its Management" 	Economic results Corporate governance Market trends Corporate strategy	<ul style="list-style-type: none"> Shareholder meetings Periodic conference calls and meetings with investors Ad hoc meetings at conferences organised by banks or other institutions Group ESG data collection
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 for solidarity initiatives Local investments Transparency	<ul style="list-style-type: none"> Education for change (e.g. Generazioni Connessi, Safer Internet Day, NeoConnessi, Una Vita da Social) Insieme si può (Together we can) Social networks The Wind Solidarity Option Digital innovation for the SDGs - Stakeholder feedback and engagement meetings
Financial community <ul style="list-style-type: none"> Banks Institutional investors Private investors Financial analysts Rating agencies 	Economic results and their sustainability Legal compliance Corporate governance Transparency Market trends Corporate strategy	<ul style="list-style-type: none"> Periodic conference calls and meetings with investors Ad hoc meetings at conferences organised by banks or other institutions

The issues that were determined to be the most relevant for the company and its stakeholders are shown in the following table [GRI 102-47].

Stakeholders	Topics of greatest interest	Main initiatives for dialogue and engagement
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	<ul style="list-style-type: none"> WINDTRE Convention Supplier audits 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	<ul style="list-style-type: none"> Ongoing dialogue with local, domestic and European institutions on all issues relating to TLC and digital innovation Specific working round-tables (e.g. 5G, Safer Internet Centre, etc.)
WINDTRE Personnel <ul style="list-style-type: none"> Employees External collaborators Union Representatives and Organisations 	Economic results Skill assessment Work/private life reconciliation Equal opportunities Workplace health and safety Transparency	<ul style="list-style-type: none"> Corporate communities (e.g. #diciamolanostra) Events (e.g. #beleaders) Pathways for the engagement of new talents (e.g. Future Land, OnStage) Engagement Survey Training Whistleblowing

Work areas	Issue	Description	Corresponding GRI Standards aspect
LIFE	Decarbonisation	Reducing the carbon footprint of activities, facilities and services.	203-Indirect economic impacts
	Smart technologies for the environment and healthcare	Facilitating research and the creation of network infrastructures that support the deployment of innovative technologies, intercepting opportunities for cross-fertilisation with other sectors, including healthcare and sectors with a high environmental impact, where smart technologies can help reduce energy consumption and therefore CO ₂ emissions as well as digitise processes that would otherwise be resource-intensive.	203-Indirect economic impacts
EDUCATION	Lifelong digital learning	Being a partner of excellence for public administrations, institutions and companies, large or small, and ensuring widespread and equal access to the most up-to-date tools to thrive in a digitised world and offer quality services and support to citizens and customers.	203-Indirect economic impacts; 406.1-Incidents of discrimination;
RESPONSIBILITY	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 socio-demographic 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.	
	Disability inclusion	Seeking and nurturing a direct and ongoing dialogue with the beneficiaries of TELCO services, to ensure that they are able to meet the specific needs of people living with a disability and to ensure an inclusive offer and demonstrate the ability to truly respond to the needs of all.	203-Indirect economic impacts; 418.1-Privacy violation; 417.3-Cases of non-compliance
INCLUSION	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; 418.1-Privacy violation; 417.3-Cases of non-compliance
	Child protection in the digital environment	Providing younger and/or inexperienced users with clear and effective tools to recognise and protect themselves from abuse, false or violent information and to generally avoid any uncomfortable conditions that may arise from the misuse of digital technologies.	

**THANK
YOU**

