



## **Integrated Policy**

Wind Tre S.p.A. intends to formally express its commitment in pursuing customer satisfaction and privacy, environmental protection, safety and respect for workers' human rights.

To this end, the company has identified the primary objectives for corporate activities:

- to comply with applicable local, national and international laws and the voluntary standards adopted;
- to meet the expectations of customers and corporate stakeholders through engagement, dialogue and searching for the best solutions together;
- to effectively apply specific policies and procedures for quality, the environment, social responsibility, health and safety at work and information security;
- to continuously improve the integrated management system, which can be measured through performance and the objectives achieved.

In keeping with the principles of the Code of Ethics and the Organisational Model, Wind Tre considers its integrated management system to be a fundamental tool for supporting and improving business activities.

Staff, customers, suppliers and all stakeholders of Wind Tre S.p.A share these principles in the knowledge that compliance with them is essential for achieving and maintaining the objectives of quality, social responsibility, environmental protection, health and safety protection.

Wind Tre Management recognises the strategic value of the integrated management system and is actively involved in respecting the declared commitments, ensuring and periodically verifying that this Policy is documented, implemented, maintained active, periodically reviewed, distributed to all personnel and made available to the public.

06/03/2020



## **ISO 9001 standard**

Wind Tre S.p.A. Management, aware of the need to evolve its business in accordance with the needs expressed by customers, has decided to integrate this commitment into its business strategy, guaranteeing the supply of high quality, reliable and sustainable products and services on the market.

The Quality strategy developed by Wind Tre aims to:

- ensure the quality of products and services offered, by understanding and meeting the needs of both external and internal customers, continuously improving the effectiveness and efficiency of processes;
- gather and manage suggestions for improvement;
- guarantee compliance with the legislative requirements applicable to the product and service offered, as well as instructions from the Telecommunications Guarantee Authority;
- guarantee the service standards set out in the Wind and Tre service charters;
- guarantee constant improvement in the quality of the services offered and their adaptation to the technological evolution of the market by implementing investment programmes.

This Policy sets out the values at the core of the company's management system and constitutes a formal commitment that must be shared and disseminated at every level in order to guide the daily work of each worker.

06/03/2020



## **SA8000 Policy**

Wind Tre S.p.A Management, aware of its role, and its responsibilities, and conscious of the fundamental added value provided by human and relational capital, has decided to integrate a commitment to social responsibility issues into its corporate strategy.

This commitment means the development of a Social Responsibility Management System (SGRS) in compliance with the SA8000 standard.

Wind Tre's Management is therefore committed to ensuring that all corporate activities comply with the standards:

- the SA8000 standard;
- the national laws in force and applicable to its sector of activity;
- the International Labour Organization (ILO) conventions and the UN Social Responsibility standards;
- commitments agreed with the parties concerned.

With reference to the specific requirements established by the SA8000 standard, Wind Tre undertakes, in particular:

- not to use or support the use of child labour;
- not use or support forced or compulsory labour;
- to ensure a safe and healthy workplace;
- to respect the right to collective bargaining and protect the freedom of association;
- not to adopt or support any form of discrimination;
- to treat all staff with dignity and respect by carrying out proper management of disciplinary procedures;
- to comply with industry laws and standards on working time;
- to pay employees in accordance with their contracts;
- to regularly review the policy and ensure the implementation, monitoring and continuous improvement of its Management System for Social Responsibility in accordance with legislative and organisational changes.

In order to improve the relationship with all stakeholders, Wind Tre S.p.A. wants the principles of the standard to be understood by both the company itself and by all suppliers/subcontractors and contractors/subcontractors involved in the activities provided.

By doing so, the company aims to:



- generate greater trust on the part of users and social organisations, demonstrating respect for ethical and social principles;
- foster relations with the institutions responsible for monitoring specific requirements (social security, welfare, health and safety);
- improve the corporate climate by involving workers more closely in achieving better working conditions;
- consider its suppliers as partners not only in the provision of services but also regarding ethical behaviour.

In order to share the Company's ethical principles and seize every opportunity to continually improve the System, Wind Tre has set up a dedicated internal channel for collecting, processing and managing reports from interested parties, the Certification Body and the Social Accountability Accreditation Services on possible anomalies in the operation of the SGRS System.

Conscious of the commitment undertaken and certain that a clear and transparent operational policy is a useful tool for conveying the principles of Social Responsibility, Wind Tre will disseminate and make its ethical policy available to all levels of the organisation and to all stakeholders, as well as report on its social performance using appropriate tools.

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## ISO 14001 standard

Wind Tre S.p.A Management, aware that needs develop its business in compliance with the principles of environmental sustainability established at international level, it has decided to integrate its commitment to protecting and safeguarding the environment into its corporate strategy.

The Environment strategy developed by Wind Tre aims to:

- make it clear to management that environmental protection activities against all forms of pollution are a top priority for the company;
- ensure compliance with local, national and international laws and regulations, with particular regard to environmental protection issues;
- evaluate the risks and opportunities related to environmental aspects, related regulatory obligations and relevant requirements expressed by stakeholders;
- develop workers' knowledge and awareness of the need to conserve environmental resources and natural ecosystems for the benefit of future generations;
- require stakeholders to understand the principles expressed in this Environmental Policy and encourage them to share and comply with them;
- set up the Environmental Management System to continuously improve its performance and constantly monitor its adherence to the targets set in order to correct any shortcomings;
- contribute to the fight against climate change and global warming by reducing climate-changing gas emissions, to be achieved by measures aimed at improving energy efficiency and reducing energy use.
- This Policy sets out the values at the core of the company's management system and constitutes a formal commitment that must be shared and disseminated at every level in order to guide the daily work of each worker.

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## **OHSAS 18001 Policy**

Conscious of the need to develop its business while protecting the health and safety of workers and people, Wind Tre S.p.A. Management has decided to integrate this commitment into its corporate strategy, guaranteeing healthy and safe workplaces and preventing accidents and incidents, according to the principle that health and safety always comes first.

The strategy for the Health and Safety of Workers developed by Wind Tre aims to:

- ensure compliance with local, national and international laws and regulations on the health and safety of workers, as well as with any other agreement that provides greater protection for workers;
- assess the risks for the health and safety of workers, taking appropriate accident prevention measures;
- develop workers' knowledge and awareness of their own and others' health and safety conditions in the workplace;
- stimulate and get workers actively involved in processes aimed at improving safety and health conditions in the workplace;
- share health and safety processes and practices with the companies working within corporate facilities.

This Policy sets out the values at the core of the company's management system and constitutes a formal commitment that must be shared and at every level in order to guide the daily work of each worker.

06/03/2020



## ISO/IEC 27001 Policy

Wind Tre S.p.A. Management, aware of the need to develop its business while safeguarding the continuity of the services provided (within the certification perimeter) and of the requirements of confidentiality, integrity and availability of the information processed (IT and non IT) within the processes supporting the certified services, has decided to integrate this commitment into its corporate strategy by implementing an Information Security Management System (ISMS), in accordance with the ISO/IEC 27001:2013 standard, in relation to "Provision of Security Management services and management of the SOC (Security Operation Center) and "Provision of Cloud Services (IAAS), Housing and Physical Security of supporting Data Centres".

The Information Security Strategy aims to:

- ensure compliance with the requirements of confidentiality, integrity and availability of the information managed within the perimeters relating to the services indicated in this policy;
- ensure compliance with company policies and strategies;
- set up and maintain an internal department to support the IMS;
- considering the presence of third parties involved in the supply of key activities to support the provision of services:
  - to manage third parties through appropriate procedures and control measures to be agreed and established,
  - to review existing contracts with the main third parties, in order to verify that appropriate safety clauses are in place,
- to identify cloud service continuity requirements, and design/implement related processes, procedures and technology solutions to support them;
- to raise awareness and adequately train internal/third-party staff on information security issues, including ethical and behavioural principles;
- to increase the value and quality of the services offered, as perceived by customers.

Aware of the commitment made, and certain that a clear and transparent operational policy is a useful tool to convey the principles related to proper management of information security, Wind Tre is committed to:

- circulating and communicating this policy to all the internal personnel involved by posting it on the company intranet, and to the third-party personnel involved by means of the appropriate communication channels;
- reviewing this policy approximately once a year and in any case following changes linked to both internal and external factors.

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