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## Wind Tre Environmental, Social and Governance (ESG) Policy


	<b>Preparation / Verification / Approval</b>	<b>Date</b>	<b>Signature</b>
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### 1) PURPOSE


The purpose of this Policy is to provide the reference principles needed to guide the company's ESG (Environmental, Social and Governance) activities, or rather the activities aimed at incorporating social, environmental and governance commitments within the company's strategy and organisation, in order to meet the needs of its various categories of stakeholders.

### 2) REFERENCES

- CKH Sustainability Policies ([https://www.ckh.com.hk/en/esg/esg\\_policies.php](https://www.ckh.com.hk/en/esg/esg_policies.php))
- Code of Conduct
- Supplier Code of Conduct
- Anti-Fraud and Anti-Corruption Policy
- Anti-Fraud and Anti-Corruption Guidelines
- Organisational Model for Wind Tre Group Companies
- Integrated Quality Management System
- Annual Sustainability Report

### 3) DEFINITIONS AND ABBREVIATIONS

Wind Tre Group	All the companies belonging to Wind Tre Group: Wind Tre Italia S.p.A. all of its direct and indirect subsidiaries and the joint ventures controlled by the latter (Wind Tre S.p.A., Wind Retail S.r.l. and 3Lettronica Industriale S.p.A. - hereinafter also "Wind Tre").
ESG	Environmental, Social and Governance. Evaluation criteria that provide a measure of the company's sustainability and responsibility with regard to environmental, social and governance aspects
KPIs	Key Performance Indicators
Stakeholders	Subjects, individuals or organisations that have interests in the performance of a company to which they are connected through various types of relationships: (customers, creditors, managers, employees, shareholders, public institutions, suppliers, trade unions, communities from which the company draws its resources, etc.)

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#### 4) INTRODUCTION

Wind Tre is aware of the link that exists between its own success, the health of the planet, and the social well-being of the communities in which it operates, as well as the need to be accountable for its activities, not only in relation to its shareholders, for whom it must guarantee long-term returns, but also in relation to other categories of stakeholders, including customers, suppliers, employees, and public institutions.

Consequently, in accordance with the indications provided by its Parent Company CK Hutchison Holdings Ltd., and in keeping with its tradition and corporate culture, the company believes that a responsible, proactive, and well-structured approach to ESG issues is needed in order to ensure the medium/long term success of its business activities.

This is one of the reasons for which the company has always been highly dedicated to the issue of sustainability, constantly striving to maximise its positive social and environmental impacts, while minimising any negative ones. This is a fundamental aspect of its Company Purpose and corporate culture, and even manifests itself in the ways that all the employees operate.

In accordance with the governance systems the company has adopted, Wind Tre's ESG approach is based on the conviction that the principles of sustainability must be integrated within all the company's activities, disseminated throughout all of its departments, and even promoted among the outside parties who contribute to the company's success, such as suppliers and business partners.

#### 5) FIELD OF APPLICATION

This ESG Policy applies to all Wind Tre employees, as well as all subjects who interact with the company in any capacity, such as consultants, agents, suppliers and business partners, who are therefore not only required to comply with all the applicable laws but must also adhere to the highest ethical standards and refrain from conducting themselves in a manner that is not consistent with the principles contained in this Policy. Third parties must also comply with the principles contained within the supplier guidelines, the code of conduct, and the organisational model, which are available on the company's website at [www.windtregroup.it](http://www.windtregroup.it).

#### 6) APPROACH


Wind Tre's stated purpose is to eliminate the distances between people. The company believes that closeness and collaboration are needed to build a more sustainable future.

In particular, the company:

- strives to create a safer digital environment for everyone, starting with the most vulnerable;
- values individuals and their uniqueness, and believes that its connectivity services serve as enablers for greater inclusion;
- strives to improve the environment, health, and quality of life for everybody, through technology;

Wind Tre aims to create a more sustainable future through dialogue, by helping all citizens transition towards a more digital and interconnected society, promoting the dissemination of the skills needed to govern and innovate technological solutions, and guaranteeing maximum prevention and protection in relation to the numerous risks these can entail.

Wind Tre also aims to actively contribute to protecting the planet and improving people's quality of life by enabling a fair and environmentally sustainable transition through its technologies.

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In keeping with the company's stated purpose of *eliminating the distances between people*, Wind Tre believes that a more sustainable future requires everyone's participation and can only be built through sharing and collaboration. It has therefore adopted a participatory approach, which requires the involvement of the various categories of stakeholders and the representatives of the various company areas, starting with the determination of the priorities, based on which plans and programmes can be established, even with regard to ESG matters.

The key topics determined together with the stakeholders and the various corporate areas serve as the starting points for laying out the sustainability strategy and business plans, and for establishing the relative reporting activities.

## 7) AREAS

In order to maximise its positive impact on society and the planet, Wind Tre and its stakeholders' representatives worked together to determine the main topics upon which to focus. These topics, and the relative activities, regard three key areas: More Responsibility, More Humanity, More Green.

### 7.1) More responsibility

Wind Tre has adopted a governance strategy designed to guarantee the fairness and integrity of all its business activities. The company has undertaken to continuously improve the security of its activities and services, to protect the sensitive data and privacy of all its customers, and to protect all citizens, starting with the most vulnerable segments of the population, such as the young and the elderly, against the potential threats linked to the use of its services, especially its online services, pursuing increasingly high standards.

In particular, Wind Tre has undertaken:

- To adopt governance tools that not only take into account the principles of fairness and ethical conduct, but also the principles of social and environmental sustainability, always striving to go beyond mere compliance with the legal and regulatory requirements
- To guarantee the fairness of its processes and the integrity and traceability of all its activities through appropriate policies, procedures, and internal systems, including the Code of Conduct, the Anti-Fraud and Anti-Corruption Policy, the Conflicts of Interest Policy, the Integrated Quality Management System, and the Organisation, Management and Control Model pursuant to Legislative Decree 231/01
- To dedicate maximum attention to the selection and monitoring of its suppliers and business partners, assessing their ability to meet the quality, environmental, social, health and ethical requirements demand them to adhere to policies and procedures of importance to Wind Tre, raising their awareness on the issues considered essential for ethical and sustainable operations, and asking them to disseminate these requirements to their agents, sub-contractors and suppliers
- To protect the most vulnerable users of its services, starting with the young and the elderly, promoting a safe and welcoming digital network, and providing the tools needed to recognise and protect themselves against abuse, false information or violence, in order to avoid harmful situations and online threats in general
- To raise awareness among families of the need to adopt a responsible approach to digital technologies and the risks of using the Internet. To establish a dialogue with teachers, parents, and seniors in order to raise their awareness of digital security issues and provide them with the tools to address them
- To protect its customers against online security threats, also through Wind Tre's own cybersecurity and data protection arrangements as well as solutions offered to customers

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### 7.2) More humanity

Wind Tre considers reducing and overcoming the “digital divide” to be a goal of fundamental importance. The company is committed to developing services that are accessible and affordable, and to ensuring equal access to them. Wind Tre is committed to promoting social inclusion and equal opportunities for all, and does so by listening to people’s real needs, and helping them prepare for the challenges of the future.

In particular, Wind Tre has undertaken:


- To promote equal access to technologies and the benefits that they can offer
- To support and disseminate the principles of fairness and non-discrimination towards minorities. To promote a society in which everyone has equal opportunities, regardless of gender, race, age, disability, and or social status. To support the digital technologies’ potential as an inclusion factor
- To nurture an open working environment that furthers the staff’s growth, is attentive to their needs, and promotes a culture of inclusiveness and personal development, maintaining a strong commitment towards achieving gender equality, to begin with pay practices
- To promote the development of the skills needed to effectively respond to change, and to prepare people to meet the challenges of the future, by investing in continuous learning pathways, both inside and outside the company
- To support the communities in which the Company operates, promoting solidarity initiatives for the more vulnerable segments of the population, and involving customers and employees in initiatives in which the Company itself actively participates

### 7.3) More green

Wind Tre considers actively contributing to the preservation of the planet and improving people’s lives to be activities of fundamental importance. The Company is committed to reducing its environmental impact as much as possible, starting with the reduction of its own greenhouse gas emissions in line with its parent company CKHGT’s science base targets, a fundamental aspect of combating climate change, and by streamlining its use of resources. Wind Tre understands climate-related risks and opportunities including impacts on the business model and any associated implications for financial planning and investments. Wind Tre also promotes the development and innovation of its services as a necessary tool for improving the sustainability of the cities and communities in which it operates.

In particular, Wind Tre has undertaken:

- To continuously monitor and reduce all of its business activities’ environmental impacts, also thanks to the activities carried out within the context of its environmental certifications and integrated quality management system
- To continuously reduce the consumption of resources, eliminate waste, and ensure an increasingly sustainable working environment. To continuously pursue maximum energy efficiency among all of its infrastructures
- To focus its efforts on reducing CO<sub>2</sub> emissions, which is crucial to combating climate change
- To help companies and consumers improve the environmental sustainability and efficiency of their activities, as well as the quality of their work and lifestyles, through innovative solutions, also developed thanks to commercial and technological partnerships
- To promote the principles of circular economy, in accordance with the recommendations of the Group and the active involvement of suppliers and partners

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- To support local Administrations in transforming their municipalities into smart and sustainable cities

## 8) TOOLS

In order to pursue the goals expressed in the previous paragraphs, Wind Tre uses the following tools, among others:

### a) MATERIALITY ANALYSIS

Wind Tre maintains regular relations with its stakeholders based on dialogue and communication. Contacts take place in various ways and with varying frequency, depending on the categories concerned, thanks to the support of the External Affairs & Sustainability department. This process takes place periodically and in a structured manner, in order to determine key topics that are fundamental from the stakeholders' point of view, as well as from a corporate strategy perspective. This process is called a "materiality analysis."

These key topics form the basis of the Company's ESG strategy and plan.

### b) ESG PLAN

Based on the material topics identified, Wind Tre undertakes to establish a series of concrete objectives. In particular, in 2021, following discussions with Wind Tre's stakeholders and management, the ESG PLAN was developed, which includes 10 objectives to be achieved between 2024 and 2030.

In order to monitor the implementation of the ESG Plan and guarantee the expected performance levels, the company has established a governance model, which is structured at every company level. This model entails a broad system of roles and responsibilities operationally coordinated by the Sustainability department. As far as possible, for each objective, the Company undertakes to establish the implementation times, the intermediate results, the intervals, and the monitoring criteria (KPIs) for the periodic reporting of results, as well as the possible adjustment of the objectives and the application of corrective actions.

### c) SUSTAINABILITY REPORT

Wind Tre periodically engages in a process of reporting to and communicating with its stakeholders with regard to its environmental, social, and governance performance. Up until now, this has been done through the Annual Sustainability Report. Numerous corporate departments take part in the collection of relevant data and information, through an annual flow of information coordinated by the External Affairs & Sustainability department.

### d) ESG RISK MANAGEMENT

As required by the CKHH Group, Wind Tre has also adopted an organisational structure to oversee the Enterprise Risk Management process, which operates in accordance with the CKHH Group Policies and the international best practices. This process covers ESG topics, and the Company conducts a Risk and Internal Control Self Assessment focusing on these topics twice a year. The assessment is conducted by the Risk Management department and is shared with the Sustainability department.

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e) **ESG REPORTING TO THE PARENT COMPANY CK HUTCHISON HOLDING**

Wind Tre actively contributes to CKH Group and CKH Group Telecom reporting and sustainability, by providing information on the various activities that the Company carries out during the course of the year in all three ESG areas and reporting a series of specific KPIs based on a structured process involving various corporate departments, all coordinated by the External Affairs & Sustainability department. Following the introduction of a digital reporting system, since 2023 the Wind Tre managers delegated to provide the KPIs for each corporate department have entered the data directly into the shared platform within the deadlines established by the parent company.

f) **CERTIFICATIONS**

Wind Tre has adopted an integrated Management System that engages all the company departments in areas of central importance to the company, in order to guarantee the quality of the products and services, environmental and worker protection, social responsibility, and information security. The goal is to guide and monitor the performance levels by applying the Total Quality Management principle of continuous improvement.

Operationally coordinated by the Quality Certification and Improvement department, the Wind Tre Integrated Quality System currently consists of eight certifications:

- Quality | ISO 9001:2015
- Environmental Management | ISO 14001: 2015
- Occupational Health and Safety | ISO 45001:2018
- Corporate social responsibility | SA8000:2014
- Information security - Cloud Services | ISO 27001:2022 (service delivery: Cloud (IAAS) Housing and physical security of the supporting Data Centres; Cloud (SAAS) Back up protection and Disaster Recovery; with the use of the ISO/IEC 27017:2015 and ISO/IEC 27018:2019 guidelines
- Information Security- Security Operations Centre | ISO 27001:2013 (provision of Security Management services and management of the Security Operations Centre)
- Energy Management | ISO 50001:2018
- Greenhouse Gas Emissions | ISO 14064-1:2018

**9) POLICY UPDATING AND MANAGEMENT**

The External Affairs & Sustainability Division's Sustainability Department is responsible for drafting and updating this document, with the input of and in collaboration with the relevant corporate departments. Approval of this policy lies with the members of the senior management (i.e. the relevant CEO direct reports), who are the final owners of all its principles.