



Integrated Policy

Wind Tre S.p.A. intends to formally express its commitment to customer satisfaction and privacy, environmental protection, rational energy use and the improvement of its energy performance and the health, safety and human rights protection of workers.

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
- to effectively apply specific policies and procedures for quality, the environment, energy, social responsibility, health and safety at work and information security
- to continuously improve the integrated management system, which can be measured through performance and achieved objectives

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.

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

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

12/30/2022



ISO 9001 standard

Conscious of the need to evolve its business in accordance with the needs expressed by customers, the Management of Wind Tre S.p.A. 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:

- Periodically assess and review the reference business context in order to prevent risks and seize any opportunities that may arise
- 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 WINDTRE service charter
- guarantee constant improvement in the quality of the services offered and their adaptation to the technological evolution of the market by implementing investment programmes
- ensure that its personnel are always adequately trained in their areas of remit
- appropriately monitor suppliers involved in business processes in order to ensure that their operations are compliant with quality requirements

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.

12/30/2022



ISO 14001 standard

In the knowledge that Wind Tre S.p.A. Management needs to develop its business in compliance with the principles of environmental sustainability established at international level and aspiring to the 17 Sustainability objectives established by the UN, it considers the protection and safeguarding of the environment a key element of its business strategy.

The Environment strategy developed by Wind Tre aims to:

- make it clear to management and all personnel 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 concerning environmental protection
- evaluate the risks and opportunities related to environmental aspects, related regulatory obligations and sustainability requirements expressed by stakeholders
- manage the network technological equipment to limit energy consumption and promote the replacement of end-of-life components with more environmentally efficient products, thanks to the simultaneous integration of sustainability criteria and requirements in the corporate procurement process
- redefine the scope of work environments with a view to flexible work, in order to reduce the environmental footprint linked to water and energy consumption and the production of waste by personnel
- invest in the modernisation of work environments and services to staff by applying environmental protection criteria, encouraging the use of automatic devices for the management of lighting and air conditioning systems and ensuring the availability of comfortable and sustainable alternatives to the use of single-use plastic
- 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 consumption within the framework of management and reporting systems to be certified according to the ISO 50001 and ISO 14064 standards
- require stakeholders to understand the principles expressed in this Environmental Policy and encourage them to share and comply with them with particular regard to the supply chain, of which Wind Tre intends to raise the sustainability rating
- 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 deviations



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12/30/2022



ISO 50001 standard

Wind Tre S.p.A. Management, aware of the need to develop its business by promoting actions to combat climate change and global warming, at all levels, through the reduction of climate-changing gas emissions, has decided to integrate the commitment to rational energy use and the continuous improvement of its energy performance into its corporate strategy.

For Scope 1 and Scope 2 emissions, Wind Tre S.p.A. undertakes to become 100% Carbon Neutral by 2030 through an organised process of quantification, reduction and compensation of CO₂ emissions generated by its products and services.

The Energy strategy developed by Wind Tre aims to:

- make it clear to management that activities to combat climate change, including actions aimed at energy efficiency, are of the highest priority for the company
- ensure compliance with local, national and international laws and regulations relating to energy efficiency, energy use and energy consumption
- evaluate the risks and opportunities related to energy aspects, related regulatory obligations and relevant requirements expressed by stakeholders
- consider the optimisation of energy performance in the design phase of new assets and renovation of existing assets
- support the purchase of green energy and energy-efficient products, equipment and services, informing suppliers that energy performance is one of the criteria for assessing supplies
- inform and make workers aware of the need to support effective energy management
- require stakeholders to understand the principles expressed in this Energy Policy and encourage them to share and comply with them
- set up the Energy Management System to continuously improve energy performance and constantly monitor its adherence to the targets set in order to correct any deviations

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12/30/2022



ISO 45001 standard

Wind Tre S.p.A. Management, aware of the need to develop its business in compliance with legal regulations on the Health and Safety of workers, considers the latter a key element of its business strategy.

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

- make it clear to management and all personnel that protecting them against risks associated with work is a top priority for the company
- ensure compliance with local, national and international laws and regulations concerning the health and safety of workers
- assess the risks and opportunities related to risk factors, legal requirements and those arising from stakeholder expectations
- ensure the creation of a software platform that allows the authorisation and compliance documentation of each company office to be shared, improving document availability and the control of the legal deadlines
- redefine the scope of the work environment with a view to flexible work, in order to improve the balance in the relationship between work and personal commitments and reduce the risks of accidents when reaching the workplace
- increase and improve participatory and sharing processes between the Safety Management System and the 231 organisational model
- improve the company car fleet by replacing existing one with vehicles equipped with advanced safety systems
- set up the Safety Management System to continuously improve performance and constantly monitor its adherence to the targets set in order to correct any deviations

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.

12/30/2022



SA8000 Policy

Wind Tre S.p.A. Management, aware of the fundamental importance of human and relational capital in the achievement of business and sustainability objectives, integrates a Management System for Social Responsibility compliant with the SA8000 standard among the tools available to its corporate strategy.

Wind Tre is committed to ensuring that all activities comply with:

- the SA8000 standard
- current national laws
- ILO (International Labour Organization) and UN conventions concerning Human Rights
- voluntary commitments adopted by the company.

Management guarantees:

- 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 this policy and ensure the continuous improvement of its Management System for Social Responsibility.

To champion its commitment, Management undertakes to:

- ensure respect for equal opportunities, introduce measures to promote gender equality and promote women's access to management positions,
- assess the risks associated with any misalignment between wages paid and the living wage
- expand the synergy with the Occupational Health and Safety Management System to improve document availability and control of regulatory compliance,



- ❑ disseminate and communicate, without distinction of level, knowledge on the subject of respect for Human and Workers' Rights and the ethical principles of Social Responsibility.
- ❑ strengthen communications related to Wind Tre's expectations about the respect of Human Rights by contracted and subcontracted companies and their workers
- ❑ facilitate the exercise of the right to whistleblowing and lodging complaints also in an anonymous form, in order to extend the company's monitoring capacity
- ❑ generate greater trust on the part of users and social organisations, demonstrating respect for ethical and social principles.

In order to improve the relationship with all stakeholders, Wind Tre S.p.A. wishes the principles of the standard to be understood not only by the organization itself, but also by all suppliers/sub-suppliers and contractors/sub-subcontractors involved in the activities provided.

Aware of the commitment undertaken, Wind Tre undertakes to communicate its social benefits with appropriate tools.

12/30//2023

For reports/complaints related to anomalies in the implementation of the SA8000 standard, please contact:

WIND TRE: qualitycertification@windtre.it | DNV: feedback.italia@DNV.com | SAI/SAAS: saas@saasaccreditation.org



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), 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 concerning:

- "Provision of Security Management services and management of the SOC (Security Operation Center)
- "Provision of Cloud Services (IaaS), Housing and Physical Security of supporting Data Centres"
- "Provision of Cloud Backup and Disaster Recovery Protection Services (SaaS)

with extension to the use of the ISO/IEC 27017:2015 and ISO/IEC 27018:2019 guidelines for the IaaS and SaaS perimeters.

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
- apply appropriate encryption solutions based on the business vulnerability of the information managed and in compliance with the applicable regulatory requirements
- ensure compliance with company policies and strategies
- set up and maintain an internal department to support the ISMS
- provide the following activities, considering the presence of third parties involved in the supply of key activities to support the provision of services:
 - manage third parties through appropriate procedures and control measures to be agreed and established
 - review existing contracts with the main third parties, in order to verify that appropriate safety clauses are in place
- identify SOC and IaaS/SaaS service continuity requirements, and design/implement related processes, procedures and technology solutions to support them
- raise awareness and adequately train internal/third-party staff on information security issues, including ethical and behavioural principles



- 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.

12/30/2022