



INWIT

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INTEGRATED REPORT
2021

[INTEGRATED REPORT]

2021

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LETTER TO STAKEHOLDERS

Dear Stakeholders,

We are pleased to present you the second edition of the Integrated Report, including the fourth edition of the INWIT Non-Financial Statement.

In the process of digital promotion and transformation that enable a more sustainable society that fosters innovation, inclusion, reducing inequalities and facilitating the adoption of a sustainable and circular production models, our mission is to support telecommunications operators in building the mobile networks (including for the development of 5G and FWA).

Through the role of neutral host, our business model is increasingly evolving toward the concept of tower as a service, in line with one of the main business models of circular economy. In fact, we can guarantee access to our infrastructures to the whole market and to offer our customers more and more integrated services, starting from a conception of the tower as a technological center.

In 2021 we consolidated and strengthened the path toward the creation of a sustainable business model, launched in 2020 following the merger by incorporation of Vodafone Towers.

In fact, it has been the first year of our Sustainability Plan, developed from the UN 2030 Agenda and focused on 5 areas of commitment, Governance, People, Environment, Innovation and Community.

To address our commitments in this direction, starting from the central role of our people, we have equipped ourselves with some ESG policies, such as Anti-Corruption, Stakeholder Engagement Management, Diversity & inclusion, Environment, Health and Safety Policy and Energy Policy.

INWIT supports the 10 principles of the Global Compact and believes that organizations should promote a sustainable environment and do business in societies that are geared towards achieving the Sustainable Development Goals, as defined by the UN 2030 Agenda. In line with this mandate, we have sent out the first Communication on Progress. Consistently, we have defined and launched a climate strategy to achieve the goal of carbon neutrality by 2024. We have obtained the validation by the Science Based Target initiative (SBTi) of a target to reduce our CO2 emissions, in line with the guidance of the scientific community and with the international agreements for fighting climate change, which aim to keep global warming below 1.5 °C. Then we built the first tower in Italy made of laminated wood, a renewable resource and an alternative to steel.

Sustainability is essential in INWIT's choices. Our activities are intrinsically committed to a sustainable approach, focusing on innovation, reduction of the digital divide, attention to the environment and people. In 2021, we published our first Integrated Report, an element that has fostered a general improvement in our results among the main ESG ratings: CDP Climate Change, MSCI, Sustainalytics, Refinitiv, FTSE Russel and Glio/Gresb.

We are proceeding along this path, aware that our infrastructures and our know-how are essential for a recovery under the banner of digitalization, more and more sustainable, envisaged by the National Recovery and Resilience Plan (PNRR) and in the direction marked out by the European Commission with the Next Generation EU towards a green, digital and resilient Europe.

INWIT



The President
dr. Emanuele Tournon

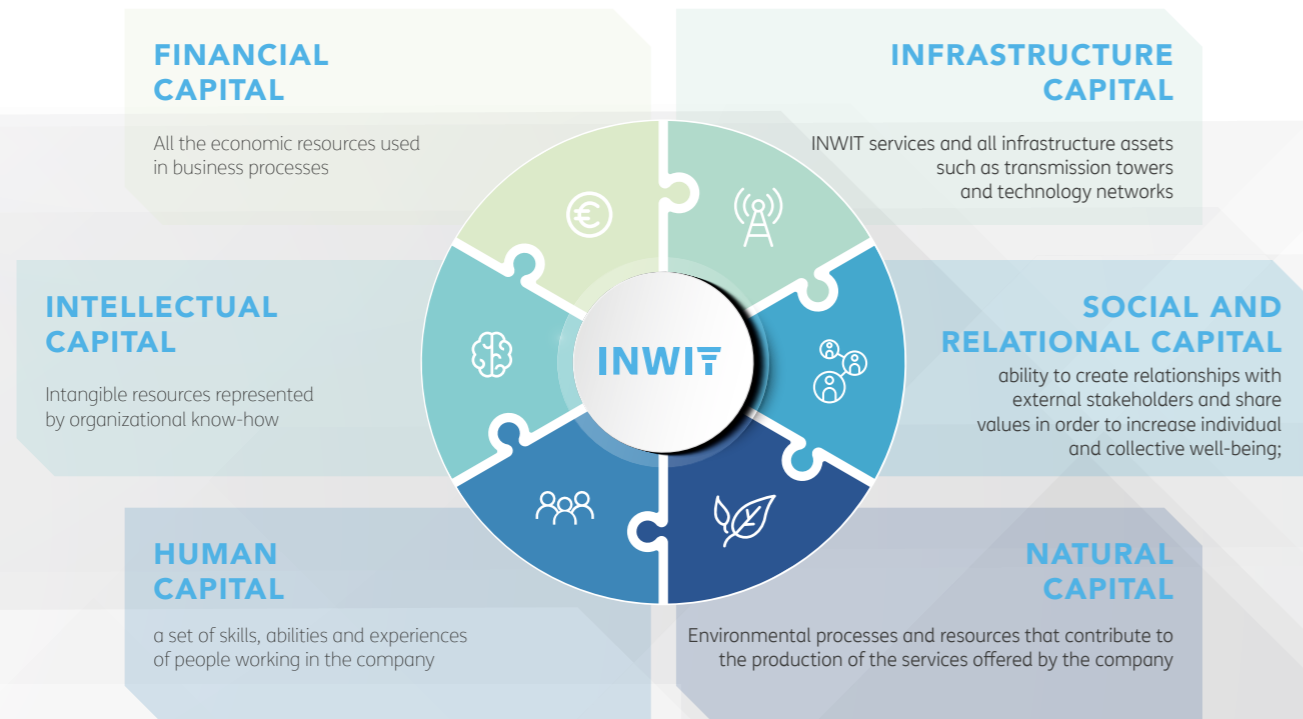


The Chief Executive Officer
ing. Giovanni Ferigo

METHODOLOGICAL NOTE

In line with the sustainability path undertaken, INWIT has published its second Integrated Report, based on the Integrated Reporting Framework (IR Framework) outlined by the International Integrated Reporting Council (IIRC). The document contains the fourth voluntary non-financial Statement (hereinafter also “Declaration” or “NFS”) of Infrastrutture Wireless Italiane S.p.A. (hereinafter also “INWIT”), prepared in accordance with Art. 3 and 7 of Leg. Decree 254/16 containing information about environmental, social issues, personnel topics, respect for human rights and the fight against corruption, to the extent necessary to ensure the understanding of business activities.

This NFS also includes disclosure of taxonomy information as required by European Regulation 852/20. This information, prepared on a voluntary basis and reported in the paragraph “Taxonomy”, includes analyzes conducted by INWIT on how and to what extent its activities are associated with economic activities under the EU Taxonomy. For this first year, information includes the share of eligible economic activities (“Taxonomy eligible”) that are not eligible for taxonomy in relation to its turnover, capital expenditure and total operating expenditure incurred. Adherence to the principles of the Integrated Report requires explaining the process by which an organization creates value over time. The purpose of this Integrated Report is to effectively represent the value generated by INWIT, using a structure that follows the breakdown by capital, defined as the variables that determine the creation of value:



The structure of the INWIT Integrated Report is designed to provide a comprehensive view of strategy, operating model and governance by integrating financial with non-financial information.

The first chapter “Company Profile” describes the key milestones in INWIT's history, the sustainability path undertaken through the Sustainability Plan, the process of defining Materiality analysis and Governance, the management of the risks and opportunities that affect INWIT's ability to create value in the short, medium, or long term.

The “Materiality Analysis” paragraph defines the process of defining material topics for INWIT, which involved internal and external stakeholders, in line with what was set out in last year's objectives.

This Integrated Report, published annually, contains non-financial data and information for the financial year from 1 January 2021 to 31 December 2021. The data for the financial year 2020 are presented for comparative purposes to allow an evaluation of the performance of the Company's activities during the two-year period.

INWIT adopted the GRI Standards indicators of the Global Reporting Initiative, adopting a GRI-referenced approach. The detailed list of the GRI Standards present in the text is summarized in the Content Index at the end of the document. The data and the information contained in the document were collected through data collection sheets, compiled by the contacts of the company functions involved. The data were extracted from the Company's systems and were validated by the function managers.

The scope of the information included in the document is aligned with that the annual financial report scope; any perimeter exceptions are appropriately described in the relevant sections of the document.

On February 24, 2022 the Infrastrutture Wireless Italiane S.p.A. Board of Directors approved this document. In accordance with Legislative Decree no. 254/16 art.3 paragraph 10, - referring to the Limited Assurance Engagement - by the auditing company PricewaterhouseCoopers S.p.A. according to the criteria set out in ISAE 3000 revised principle. The audit report is attached to this declaration.

Table 1 Table of connection between Leg. Decree. 254/2016, Integrated Report 2021 and references to the <IR> Framework

TOPIC OF D.lgs. 254/2016	Q.lgs. 254/2016	Integrated report 2021		Content elements of <IR> Framework
		Capital	Chapter/Paragraph	
Relevant themes	Art. 3 paragraph 1	Company profile	Sustainability for INWIT	AND Strategy and allocation of resources
Business model of management and organization	Art. 3 paragraph 1a	Company profile	Competitive positioning and value creation of INWIT GovernanceGovernance	TO Presentation of the organization and the external environment B. Governance C. Model of Business Strategy and allocation of resources
Company policies, results, indicators	Art. 3 paragraph 1b	Company profile Human capital Financial capital	Governance Paragraphs of all capitals	B. Governance F. Performance Tutti i capitali
Main risks	Art. 3 paragraph 1c	Company profile	Governance	Q. Opportunities and risks
Energy resources, water resources, emissions	Art. 3 paragraph 2a Art. 3 paragraph 2b	Natural Capital	Environmental protection Energy management Climate change	Natural Capital
Impact on environment, health and security	Art. 3 paragraph 2c	Human capital	Health and safety at work Climate change	Human capital Natural Capital
Personnel management and gender equality	Art. 3 paragraph 2d	Human capital	Recruitment and termination Our people, their well-being, development and valorisation	Human capital
Respect of human rights	Art. 3 paragraph 2d Art. 3 paragraph 2e	Infrastructure capital Social and relational capital	INWIT: History and values Relations with the community and in the territories Supply chain	C. Business model Social and relational capital
Fight against active and passive corruption	Art. 3 paragraph 2f	Company profile	Prevention of corruption	
Standard reporting adopted.	Art. 3 paragraph 3, 4, 5	Methodological note Attachments	Methodological note GRI Content Index	
Diversity in composition of organs administration	Art. 10 para. 1a	Company profile Attachments	Governance GRI Content Index	
			Letter to stakeholders	G. future prospects

[COMPANY PROFILE]



HIGHLIGHTS



- ▶ Anti-Corruption Policy
- ▶ Stakeholder Engagement Policy
- ▶ 46% women in Board of Directors
- ▶ Ethical and Integrity Pact

GOVERNANCE



- ▶ 785.158.160 € generated value
- ▶ 29% distributed economic value
- ▶ 71% retained economic value
- ▶ First Sustainability-linked term loan

FINANCIAL CAPITAL



- ▶ Almost 23.000 sites
- ▶ About 46.000 hospitality
- ▶ 265 DAS projects
- ▶ Business continuity Plan

INFRASTRUCTURE CAPITAL



- ▶ First wooden tower in Italy
- ▶ Fast-site plant
- ▶ Athena BIM Management platform
- ▶ 5 open innovation partnerships

INTELLECTUAL CAPITAL



- ▶ 420 suppliers
- ▶ 99% local expense
- ▶ Over 10 local coverage initiatives
- ▶ 7 Talk FOR 5G
- ▶ 1 Tour FOR 5G

SOCIAL AND RELATIONAL CAPITAL



- ▶ 246 employees
- ▶ 51 new employees, of which 47% women
- ▶ Policy D&I
- ▶ + 15.700 training hours
- ▶ 64 hours pro-capie
- ▶ Zero injuries

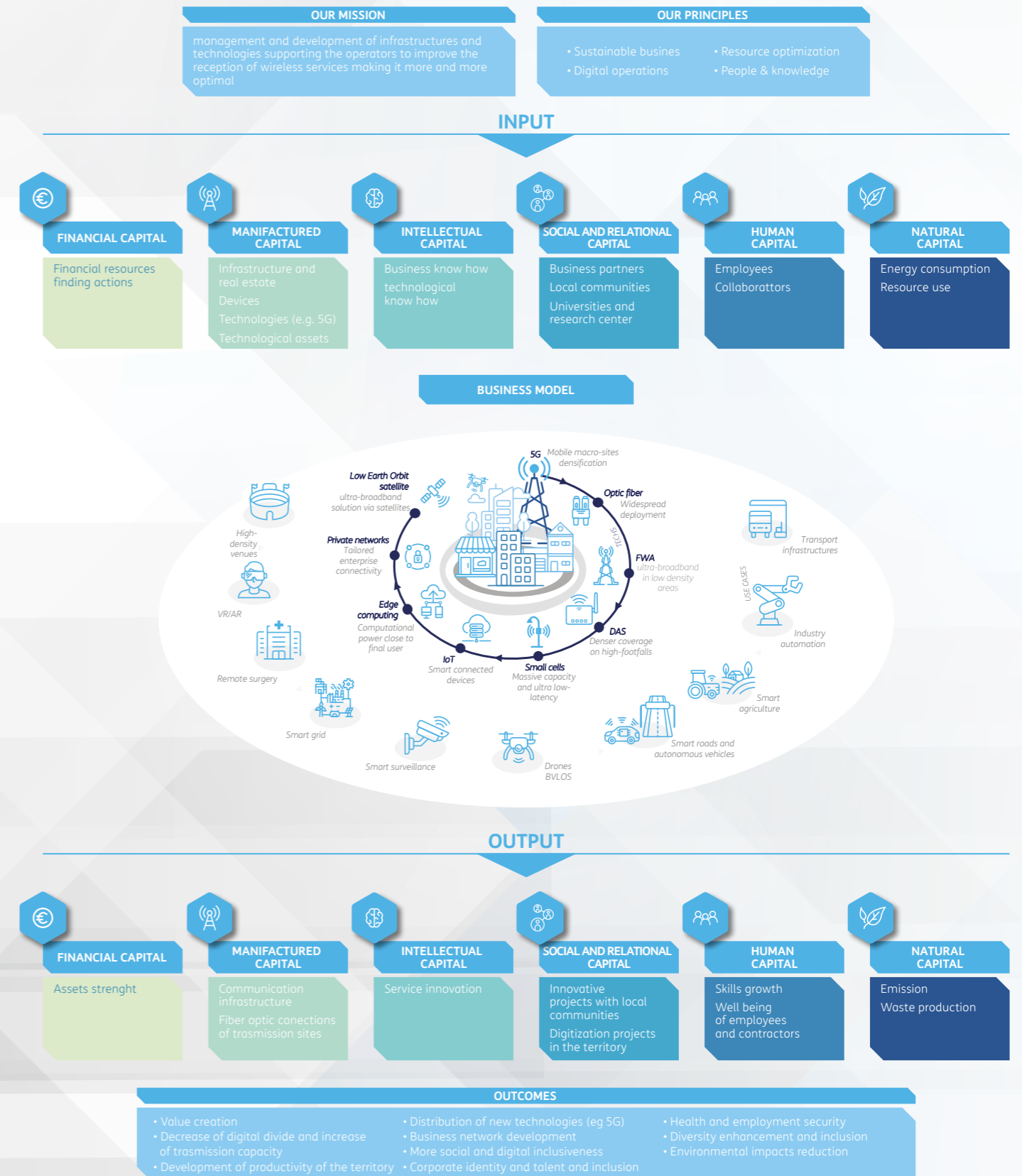
HUMAN CAPITAL



- ▶ Energy Policy and Health, Safety and Environment
- ▶ Climate strategy SBTi approval
- ▶ 69% electricity from renewable sources
- ▶ 97% of the recycled waste

NATURAL CAPITAL

INWIT'S BUSINESS MODEL AND STRATEGY FOR THE VALUE CREATION



INWIT: HISTORY AND VALUES

GRI 102-1, 102-2, 102-3, 102-4, 102-5

Infrastrutture Wireless Italiane S.p.A. is **the major operator in the wireless infrastructure sector in Italy** who realizes and manages technological plants and civil structures (such as towers, pylons and poles) for hosting radio transmission devices, mainly at the service of telecommunication operators.

An offer that grows as a function of technological development.

Aiming for continuing developing the optimization of wireless service and driving the towers evolution from passive infrastructure to connected, shared, and protected digital infrastructure, in recent years INWIT has expanded its offering with a number of additional services. INWIT is realizing the coverage service for mobile telephony through proprietary

DAS (Distributed Antenna System), which allow to obtain an optimal coverage of sites with a high frequency, both outdoor and indoor, especially important in view of the ongoing technological transition from 4G to 5G. INWIT contributes significantly to the coverage of wireless telecommunications services on the Italian territory, increasing its sites also according to the development of new technologies. All this makes it an essential infrastructure for the development of telecommunications technologies, ensuring coverage and ubiquity that will contribute significantly to overcoming the digital divide in our country. Therefore, INWIT is well positioned to support the ongoing digitization process and serve the growing demand for connectivity.

An evolution started 40 years ago.

INWIT's activity is directly linked to the birth and development of mobile telephony in Italy, by the two main operators in the sector. INWIT is the result of the merger between Telecom Italia and Vodafone Italia's wireless infrastructure and activities. The company benefits from a wealth of expertise gained over time through the realization and management of

the infrastructures that host the transmission systems of the different generations of mobile radio services that taken place throughout the years. Thanks to this development, which begun 40 years ago, INWIT now guarantees its customers access to areas of strategic importance also in relation to administrative and environmental issues.

INWIT's history began in March 2015 following *the spin-off* of Telecom Italia's "Tower" branch, designated to manage the operational, monitoring and maintenance of the group towers and repeaters. Since March 2020, INWIT started a process of intense staff growth, realized through the merger with Vodafone Towers, which significantly transformed its dimensional and strategic profile. In October 2021 INWIT finalized the transaction for the purchase of approximately **700 radioelectric systems, covering 1,000 km of road and highway tunnels**, as well as 42 DAS systems. Tunnels include significant sections in the national connections due to the number, conformation and need for cellular coverage in the tunnel. The DAS included some important hotels, stadiums, sports facilities and offices.

A present that consolidate the future.

The acquisition leads INWIT to become a national player of long-term connectivity in the road segment as part of the digitization path in support of smart roads, which will require *IoT (Internet of things)* systems to acquire and transmit information on the state of the road infrastructure

and security monitoring activities, as well as to strengthen company's role in the indoor coverage market (DAS).

Last September 2021, INWIT installs the **first tower in Italy structured in laminated wood**, instead of steel, for mobile telecommunications, which fits into this evolutionary path, with the aim of reconciling the commitment to environmental protection and the desire to continue to innovate.

The INWIT infrastructure now has almost **23.000 managed sites**, distributed in a way throughout the national territory (**one tower every about 3 km**), on which are housed the transmission equipment of all the main national operators, and thousands of small cells and DAS systems.

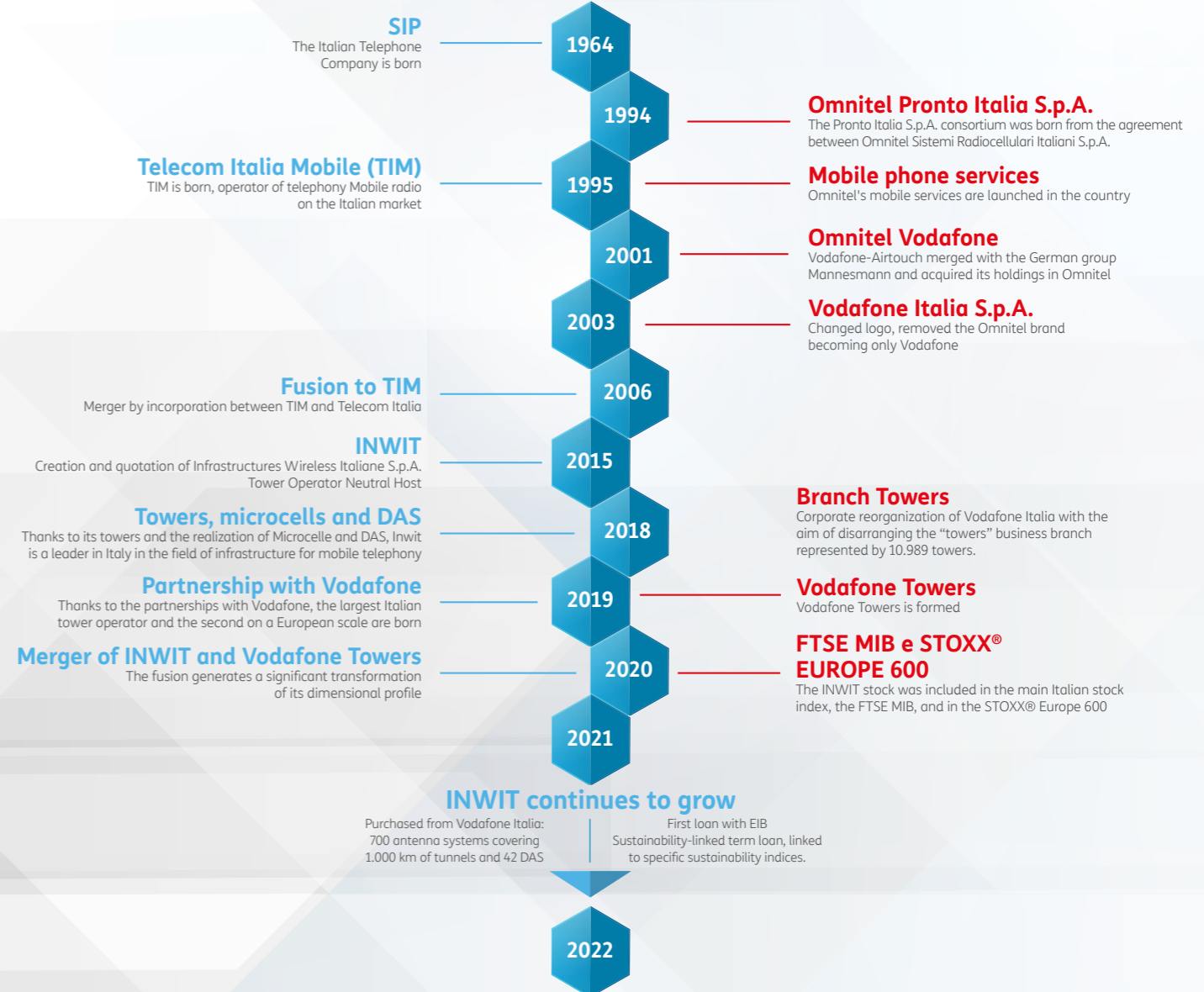
In June 2020, INWIT was included in the main Italian stock index, **the FTSE MIB**, and last September in STOXX® Europe 600, consisting of 600 of the most market-capitalization companies in Europe. In April 2021, INWIT was evaluated in terms of BB+ credit rating (stable) by S&P and BBB- (stable) by Fitch, confirming the previous year's valuation.

22nd June 2020
the title **INWIT**
was included
in the **FTSE MIB**

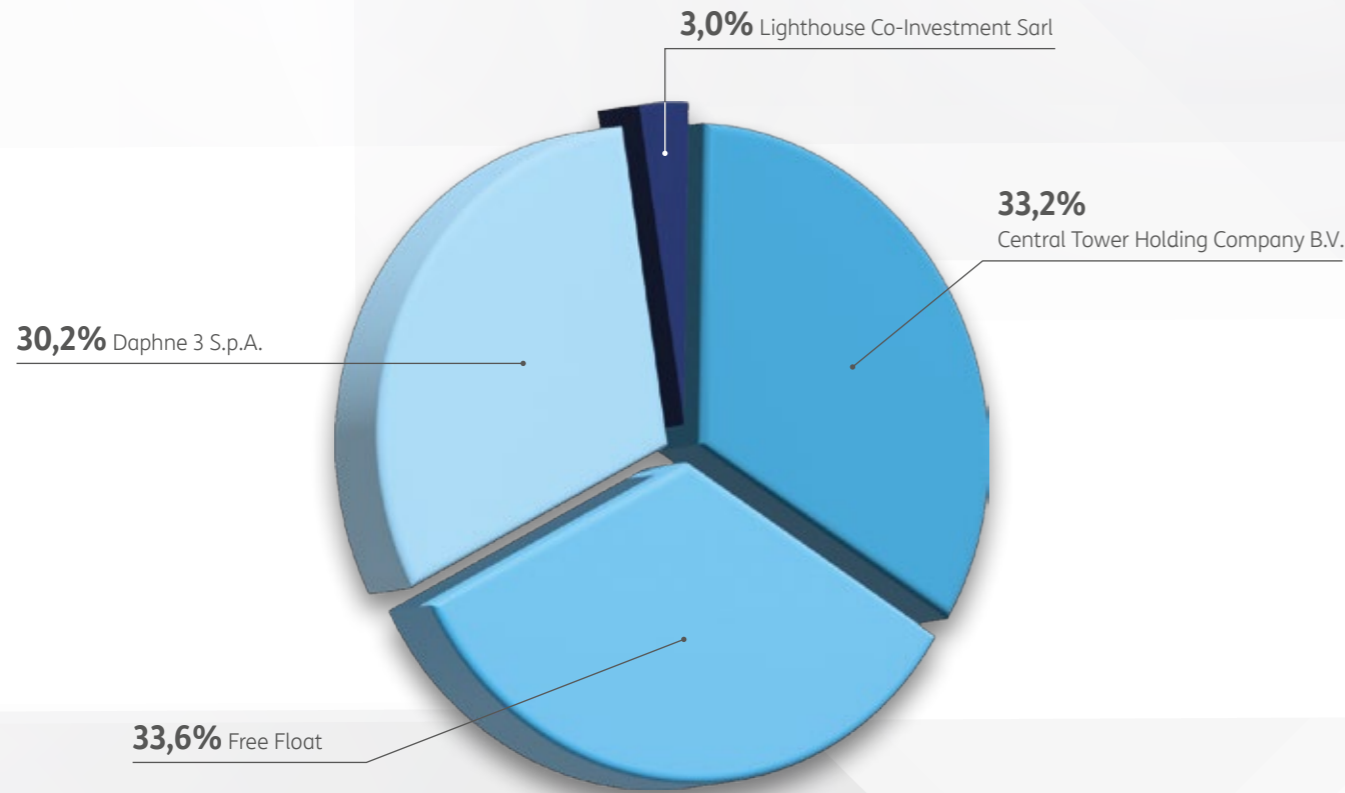
After the entry into the debt capital market in July 2020, with the issue of the first bond, followed by a second bond in October 2020, INWIT successfully concluded its **third bond issue** in April 2021, totaling EUR 500 million. a **sustainability-linked term loan** was also signed, linked to specific sustainability indicators, amounting to 500 million euros, with a pool of 4 financial institutions (more details in the Financial Capital chapter)

In August 2021, the **first financing, amounting to EUR 250 million, has been signed with the European Investment Bank (EIB)** in support of INWIT's investment plan, which was intended for the development of digital infrastructures in Italy for the service of telecommunications operators.

Figure 1 The main stages of INWIT's history



SHAREHOLDER STRUCTURE AT 31.12.2021



Daphne 3 is in turn controlled 51% by TIM and 49% by a Consortium led by Ardian. Central Tower Holding Company B.V. is indirectly owned by Vodafone Group PLC, similar to VOD EU, and therefore a subsidiary of VOD EU. Tim and Vodafone jointly control INWIT.

Since the last 2020, INWIT has supported TIM and Vodafone Italia in the development of the new network for the development of 5G and guarantees the whole market access to its infrastructures.

INWIT also continues its journey toward a true paradigm shift toward the creation of a sustainable business model. In this direction the Sustainability Plan was updated to 2024, which foresees the development of initiatives and projects focused on 5 areas of commitment, Governance, people, Environment, Innovation, Communities.

One year after joining the **principles of the Global Compact promoted by the United Nations Organization** on Human Rights, Labor standards, environmental protection, and the fight against corruption, INWIT drafted its first Communication on progress (COP) in November 2021 to confirm the desire to integrate the ten principles into the company's strategy, culture and day-to-day operations. In addition, in order to strengthen its commitment to inclusion and sustainability, INWIT has signed **the Women's Empowerment principles** promoted by UN Global Compact and UN Women.



COMPETITIVE POSITIONING AND INWIT'S VALUE CREATION

GRI 102-6, 102-7

The market and the technological context are rapidly evolving in Italy thanks to the evolution of wireless technology that is extending 5G coverage and related densification requirements, an important development element for wireless infrastructures. In addition, the Next Generation EU, the EU's important instrument, is designed to boost post-pandemic recovery and development from COVID-19. The National Recovery and Resilience Plan (PNRR), which Italy has prepared in the framework of the Next Generation EU, dedicates space and considerable resources to the theme concerning country's innovation in a digital key. The "Italy 5G Plan" and the "Italy at 1 Giga" project should support the demand of wireless coverage, the reduction of the digital divide, and extensive digitization of the country.

Innovation, digitization, competitiveness, and security of the productive system and public administration will be key elements of post-pandemic society, which must be not only more competitive and efficient, but also more sustainable, inclusive, and resilient.

The facts of the last two years have shown the importance of digital, accelerating the country's digitization process. The digital dimension, now, represents a necessity, for enterprises and public administration, in the process of transformation toward more agile and flexible organizational, productive and service models, on private and public level. This opens opportunities for tower operators and INWIT is well positioned to play an **important role in the development of digital infrastructures**, in support telecommunications operators.

INWIT is well positioned to play an **important role in the development of digital infrastructures.**

INWIT is leader in Italy with almost 23.000 towers, about 46.000 hospitalities and the best quality asset park. INWIT is actually the result of the merger of TIM and Vodafone infrastructures, which, as an incumbent and first challenger, since the beginning of mobile telecommunications in Italy, to create the best networks, distinguished both by the quality of the locations and by the high standard of realization of the infrastructures. INWIT has inherited all of this heritage, along with a wealth of technical and professional knowledge, and is working to consolidate it by creating a set of systems, processes and knowledge that can create value, in service of fast and efficient development of 5G by operators.

INWIT is creating a set of systems, processes and **knowledge that can create value, at the service of the fast and efficient development of 5G by operators.**

Hospitality is expected to grow for both Tim and Vodafone supporting the efficient and fast 5G development and continuous improvement of territorial coverage. Moreover, the role of "neutral host" allows INWIT to meet the demand of all the main market players, both mobile and Fixed Wireless Access (FWA), a technology highlighting in particular strong growth dynamics.

In line with this growth, INWIT's business is increasingly evolving toward the concept of tower as a service, thanks to the possibility to offer more integrated services starting from the infrastructure, in line with *product as a service* model, one of the main business models of circular economy.

INWIT shares its assets and infrastructure, and also ensures maintenance, to multiple customers who use them without ownership. In this way it is avoided that every operator realizes his own infrastructure, with consequent environmental benefits detectable throughout the life cycle of the assets,



from the use of materials for the realization, to the use of energy in the exercise phase, until reaching the end of life phase.

At the same time, the towers will be able to offer different services to operators, through a transformation from radio-transmission hospitality infrastructure to a technology center, where IoT components, drones, and communication systems are merged to support telecom operators.

INWIT's industrial plan, in fact, is advancing toward ever more intelligent towers: Digital assets, distributed and protected, which can make a concrete contribution to the digital transformation of the country's economic and social activities. The capillary presence of the INWIT towers allows the provision of advanced services even in areas where fiber-optic connectivity will arrive later, thus anticipating the digitization of the country and reducing the digital divide.

In addition, the Industrial Plan involves experimentation and development of businesses: from the Internet of things (IoT) to hosting mini-data centers to place at the base of our towers for services that need low latency, to the world of drones.

Strong and sustainable growth thanks to the 4 pillars of the industrial plan

Another pillar of the industrial strategy is the rapid development of micro-covers, in particular distributed antenna systems (DAS) that allow to efficiently manage the mobile telephone signal even in very crowded areas such as stadiums, hospitals, universities, stations or industrial plants. The development of DAS systems saw a significant improvement in 2021, thanks to the growth of the number of hospitalities on the installed infrastructure, the increasing number of equipped locations and an investment in dedicated covers along about 1.000 km of road and motorway tunnels.

INWIT has also presented a Sustainability Plan, which fully integrates into the industrial strategy and through which it aims to make the transition toward a sustainable business model, considered a enabler for the growth of the Company.

In February 2022, as part of the regular analysis cycle of external scenario and development opportunities for the Company, the Board of Directors of INWIT confirmed the guidance of the industrial plan presented in November 2020, in the context of a positive cycle of digital and infrastructure investments, supported by Next Generation EU projects.

In global environment, INWIT plays a leading role in digital transformation to support operators to develop new infrastructure for implementing 5G, FWA and micro-coverage with DAS and small cells, while also taking care of the technological opportunities of the future and directing their choices toward sustainable models. In this way, INWIT participates in the creation of a more digital and sustainable Italy.

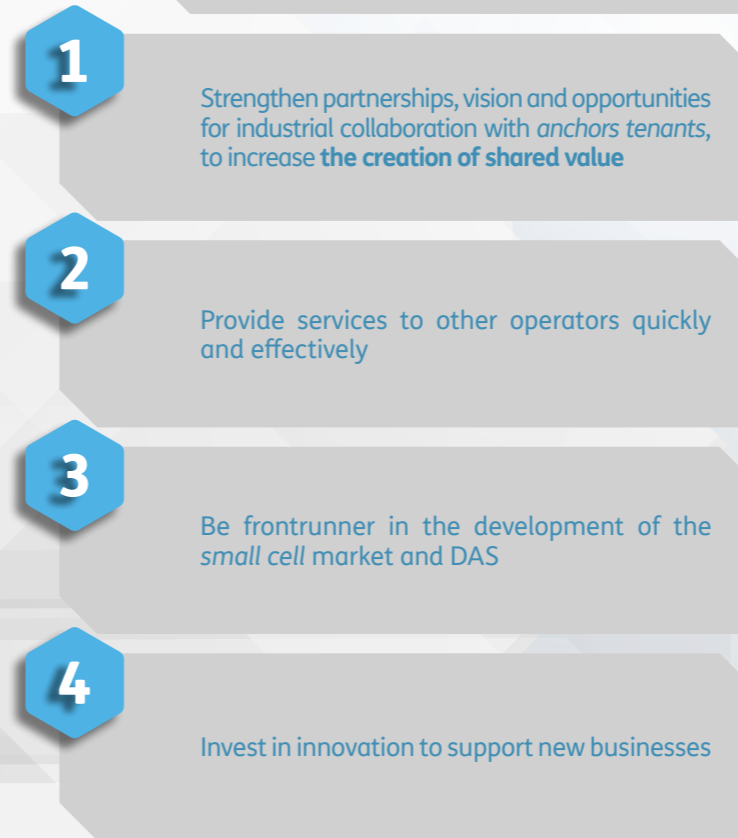
GROWTH PILLARS



ENABLERS



Strategic pillars of the industrial plan



Value created for stakeholders



SUSTAINABILITY FOR INWIT

“SUSTAINABILITY FOR INWIT IS AN INTEGRAL PART OF BUSINESS STRATEGIES WITH THE **GOAL OF GENERATING VALUE** IN A LONG-TERM PERSPECTIVE AND **CONTRIBUTING TO THE GROWTH, IMPROVEMENT AND SOCIAL AND ECONOMIC DEVELOPMENT** OF THE COMMUNITIES IN WHICH IT OPERATES.”

Giovanni Ferigo, INWIT's CEO

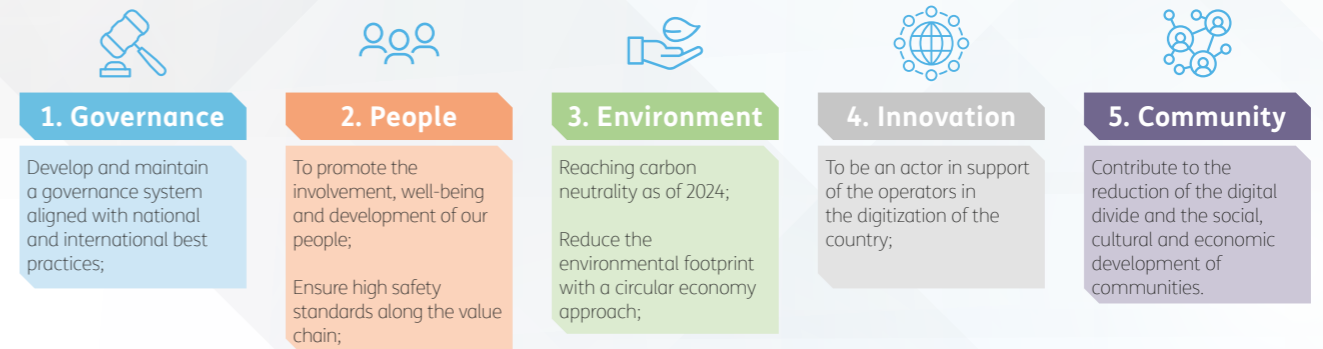
Since 2020, INWIT has embarked on a path to implement of a modern and sustainable business, starting activities and projects aimed at integrating sustainability at 360 degrees within the company itself and then creating value in the long term.

INWIT firmly believes that the culture of sustainability before being directed and communicated to the outside should be acquired in its own organization. In line with this principle, INWIT, first of all, has put its energies to disseminating sustainability among its employees through information and awareness-raising activities on sustainability issues and creating an inclusive working environment, as recognized by the Refinitiv “2021 Diversity & inclusion Top 100 Index”, in which INWIT was the second Italian company and the second largest company in the sector, globally. During 2021, the D&I Policy was approved, an internal climate analysis was carried out and the target of 40% female candidates in the selection phase was reached. Finally, with a view to continuous improvement, and with the commitment to achieve increasingly challenging goals in the ESG areas, in line with the industrial strategy, INWIT has planned a **Sustainability Plan's update to 2024**.

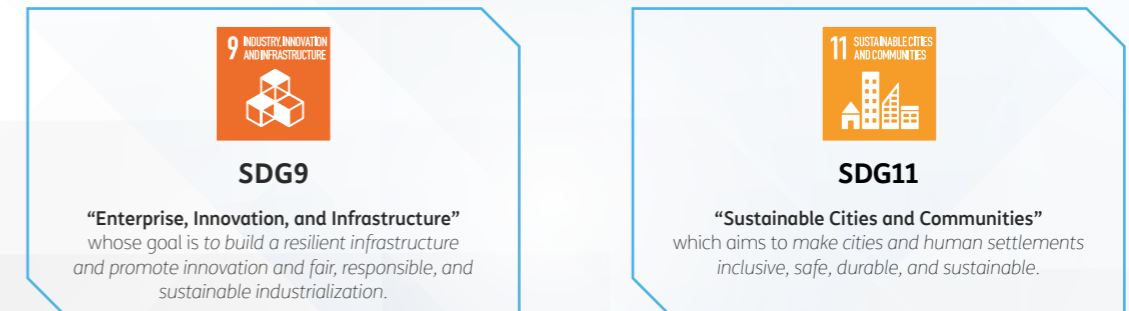


SUSTAINABILITY PLAN

Last year, in line with the 2030 Agenda for Sustainable Development, defined in September 2015 by the governments of the 193 UN member countries, INWIT launched its Sustainability Plan, structured on 5 areas of Environmental, Social and Governance (ESG) commitment, with medium-long-term objectives; these are described below:



INWIT has identified UN Agenda Sustainable Development Goals (SDGs) to which it can contribute directly through its *core business*:



The INWIT business contributes to the achievement of further SDGs, integrated into the Sustainability Plan. These include health and safety, quality education, gender equality, decent work and economic growth, as well as environmental issues, business ethics and partnerships.

In order to show how the actions envisaged in the Sustainability Plan are capable of influencing and contributing concretely to the achievement of the United Nations Sustainable Development Goals, INWIT has associated the activities envisaged in the Plan with one or more specific targets of the UN Agenda Goals, as follows:

Figure 3 3 SDGs included in the INWIT Sustainability Plan





GOVERNANCE

MEDIUM-LONG TERM GOAL	SDGs	UN AGENDA 2030 Targets	SUSTAINABLE DEVELOPMENT GOALS	LINES OF ACTION	ACTIVITIES
Develop and maintain a governance system in line with national and international best practices.		8.3 Promote development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formalization and growth of micro-, small- and medium-sized enterprises, including through access to financial services.		1. Develop and implement the system of sustainability delegation and responsibility.	1.1 inclusion of sustainability targets in incentive mechanisms.
		12.6 Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle.		2. Develop and implement transparency templates and tools.	2.1 Stakeholders engagement. 2.2 INWIT's inclusion in ESG ratings / indexes. 2.3 ISO 37001 Anti-Corruption. 2.4 TCFD Reports.
		13.1 Strengthen resilience and adaptability to climate and disaster risks natural in all countries.		3. Integrate sustainability principles into the supply chain.	3.1 Creating awareness on ESG on the supply chain.
		16.b Promote and enforce non-discriminatory laws and policies for sustainable development.			

2021 results of the Sustainability Plan.

Sustainability targets in MBO and LTI.
 Policy Stakeholder engagement and first Stakeholder Forum.
 Purchase procedure: Clauses linked to ESG risks in 100% of supply contracts.
 CDP Questionnaire.
 Signature of the Ethics and Integrity Pact by all suppliers.
 ESG questionnaire to raise awareness of ESG issues in the supply chain.



PEOPLE

MEDIUM-LONG TERM GOAL	SDGs	UN AGENDA 2030 Targets	SUSTAINABLE DEVELOPMENT GOALS	LINES OF ACTION	ACTIVITIES
Encourage the engagement, well-being and development of our people.		4.4 By 2030, substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship.		4. Develop talent and skills.	4.1 Ensure employee participation in training and skill development initiatives.
		5.1 End all forms of discrimination against all women and girls everywhere. 5.5 Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life.		5. Increase corporate identity.	5.1 Carrying out internal climate analysis. 5.2 5.2 Business HR Awards.
		8.5 By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value. 8.8 Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment.		6. Promote awareness on Diversity and inclusion.	6.1 Identify corporate priorities and policies on the D&I topic. 6.2 ISO 30415 HR.
Ensure high safety standards along the value chain.		3.d Strengthen the capacity of all countries, in particular developing countries, for early warning, risk reduction and management of national and global health risks.		7. Promote the culture of health and safety with a zero-dead target at work.	7.1 ISO 45001 Health and safety at work 7.2 Reduction of injuries indices

2021 results of the Sustainability Plan.

95,9% of employees involved in at least one training initiative.
 15.713 hours provided.
 64 hours per capita.
 Internal climate analysis.
 Refinitiv D&I Top 100 Index: INWIT 2nd Italian company.
 D&I Policy.
 140 women selected out of a total of 348 candidates: 40,2%.
 HSE Policy for ISO 45001 Certification.
 Zero injuries (including contractors).

ENVIRONMENT

MEDIUM-LONG TERM GOAL	UN AGENDA 2030	SUSTAINABLE DEVELOPMENT GOALS	LINES OF ACTION	ACTIVITIES
	SDGs	Targets		
Reach the carbon neutrality by 2024.	13 CLIMATE ACTION	13.1 Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries.	8. Developing an Energy and carbon Management System.	8.1 Definition of a Climate strategy. 8.2 ISO 50001 Energy. 8.3 Development of renewable sources (PV). 8.4 Energy efficiency initiatives. 8.5 Green energy purchasement.
		13.2 Integrate climate change measures into national policies, strategies and planning.		
		8.4 Improve progressively, through 2030, global resource efficiency in consumption and production and endeavour to decouple economic growth from environmental degradation, in accordance with the 10-year framework of programmes on sustainable consumption and production, with developed countries taking the lead.		
Reduce the environmental footprint with a circular economy approach.	8 DECENT WORK AND ECONOMIC GROWTH	8.4 Improve progressively, through 2030, global resource efficiency in consumption and production and endeavour to decouple economic growth from environmental degradation, in accordance with the 10-year framework of programmes on sustainable consumption and production, with developed countries taking the lead.	9. Develop a management system aimed at reducing environmental impacts.	9.1 ISO 14001 Environment. 9.2 Initiatives to increase the life cycle of materials and products. 9.3 Life cycle analysis of the different model sites. 9.4 To carry out an assessment of the impacts of macro sites on biodiversity.
		12.2 By 2030, achieve the sustainable management and efficient use of natural resources.		
		12.5 By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse.		
	12 RESPONSIBLE CONSUMPTION AND PRODUCTION	12.6 Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle.		
	15 LIFE ON LAND	15.5 Take urgent and significant action to reduce the degradation of natural habitats, halt the loss of biodiversity and, by 2020, protect and prevent the extinction of threatened species. 15.a Mobilize and significantly increase financial resources from all sources to conserve and sustainably use biodiversity and ecosystems.		

2021 results of the Sustainability Plan.

Climate Strategy and Scenario Analysis.
 Science Based Target approval and submission.
 Energy policy for ISO 50001 certification.
 Energy Efficiency: 300 Freecooling and 1.153 high efficiency rectifiers for a total saving of 5,85 GWh when fully operational.
 32 photovoltaic systems.
 69% electricity from renewable sources.
 GHG Emission Quantification Model (Scope 1, Scope 2, Scope 3).
 Policy for ISO 14001 Certification.
 97% Recycled material.

INNOVATION

MEDIUM-LONG TERM GOAL	UN AGENDA 2030	SUSTAINABLE DEVELOPMENT GOALS	LINES OF ACTION	ACTIVITIES
	SDGs	Targets		
Be an actor in supporting the operators in the country's digitization.	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	9.1 Develop quality, reliable, sustainable and resilient infrastructure, including regional and transborder infrastructure, to support economic development and human well-being, with a focus on affordable and equitable access for all.	10. Develop and consolidate high-quality, technologically advanced infrastructure.	10.1 Increase and strengthen micro-coverage 10.2 Tower upgrade (smart cities, drones, IoT etc...) 10.3 Develop a customer satisfaction system.
		11.a Support positive economic, social and environmental links between urban, per-urban and rural areas by strengthening national and regional development planning.		
		11.17 Encourage and promote effective public, public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships Data, monitoring and accountability.		
	11 SUSTAINABLE CITIES AND COMMUNITIES	11.a Support positive economic, social and environmental links between urban, per-urban and rural areas by strengthening national and regional development planning.	11. Fostering open innovation initiatives.	11. Collaborations for the development of technological innovation (e.g. Start up/ Companies / Universities / Research Institutes...).
	17 PARTNERSHIPS FOR THE GOALS	17.17 Encourage and promote effective public, public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships Data, monitoring and accountability.		

2021 results of the Sustainability Plan.

Test solutions to standardize the implementation of microcells on light poles.
 Athena BIM Management platform completed.
 Use-cases experimentation: AI algorithms for air quality monitoring, cameras for meteorological and environmental monitoring.
 POC on highway monitoring with drones in the startup phase.
 Partnership with ENEL.
 "5G & beyond" Observatory with POLIMI.
 Collaboration with ELIS consortium for IoT platform development and experimental laboratory development at consortium headquarters.
 Startup involved.
 Membership of THE ORAN Alliance.
 POC using PCM phase change materials.
 Start-up Digital Magics acceleration program on 5G and IoT.

COMMUNITY

MEDIUM-LONG TERM GOAL	UN AGENDA 2030	SUSTAINABLE DEVELOPMENT GOALS	LINES OF ACTION	ACTIVITIES
	SDGs	Targets		
Contribute to the digital divide's reduction and to the communities' social, cultural and economic development.	11 SUSTAINABLE CITIES AND COMMUNITIES	11.4 Strengthen efforts to protect and safeguard the world's cultural and natural heritage.	12. Promote and develop collaborative projects to increase the coverage of smaller municipalities, rural areas and sites of high social and cultural value.	12.1 Promoting projects to reduce digital divide 12.2 Promoting projects covering areas with a high social and cultural vocation (museums, hospitals...).
		11.a Support positive economic, social and environmental links between urban, per-urban and rural areas by strengthening national and regional development planning.		
		17.17 Encourage and promote effective public, public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships Data, monitoring and accountability.		
	17 PARTNERSHIPS FOR THE GOALS	17.17 Encourage and promote effective public, public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships Data, monitoring and accountability.		

2021 results of the Sustainability Plan.

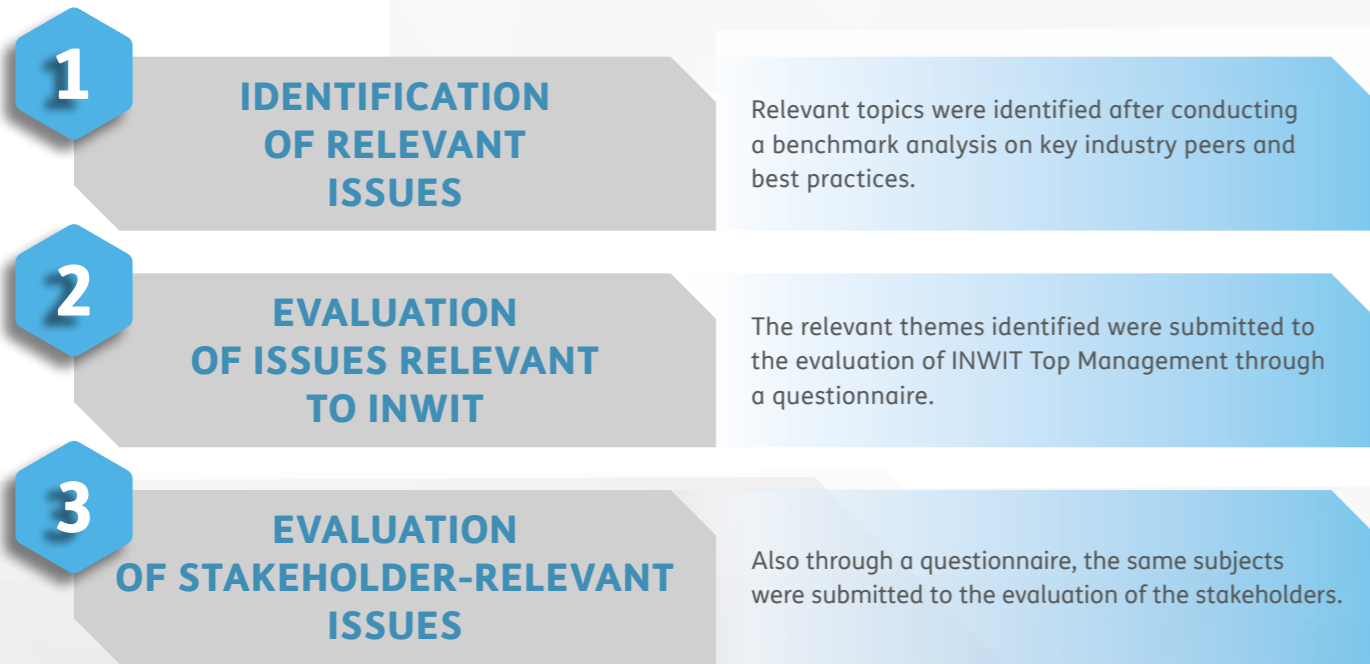
Coverage of areas with a high social and cultural vocation:
 • 8 hospitals realized and 1 in progress.
 • LUISS University of Rome, Federico II of Naples.
 • The National Railway Museum of Pietrarsa.
 • Congress Center La Nuvola of Rome.

MATERIALITY ANALYSIS

GRI 102-40

In line with the provisions of Legislative Decree n. 254/2016 2021, INWIT updated the Materiality matrix by identifying the themes considered “material” reflecting the significant (positive/negative) impacts of the organization in the economic field, according to the methodologies and principles of the GRI standards defined by the global reporting initiative. environmental and social and influencing stakeholder decisions.

Figure 4 Essential steps for the evaluation of relevant themes

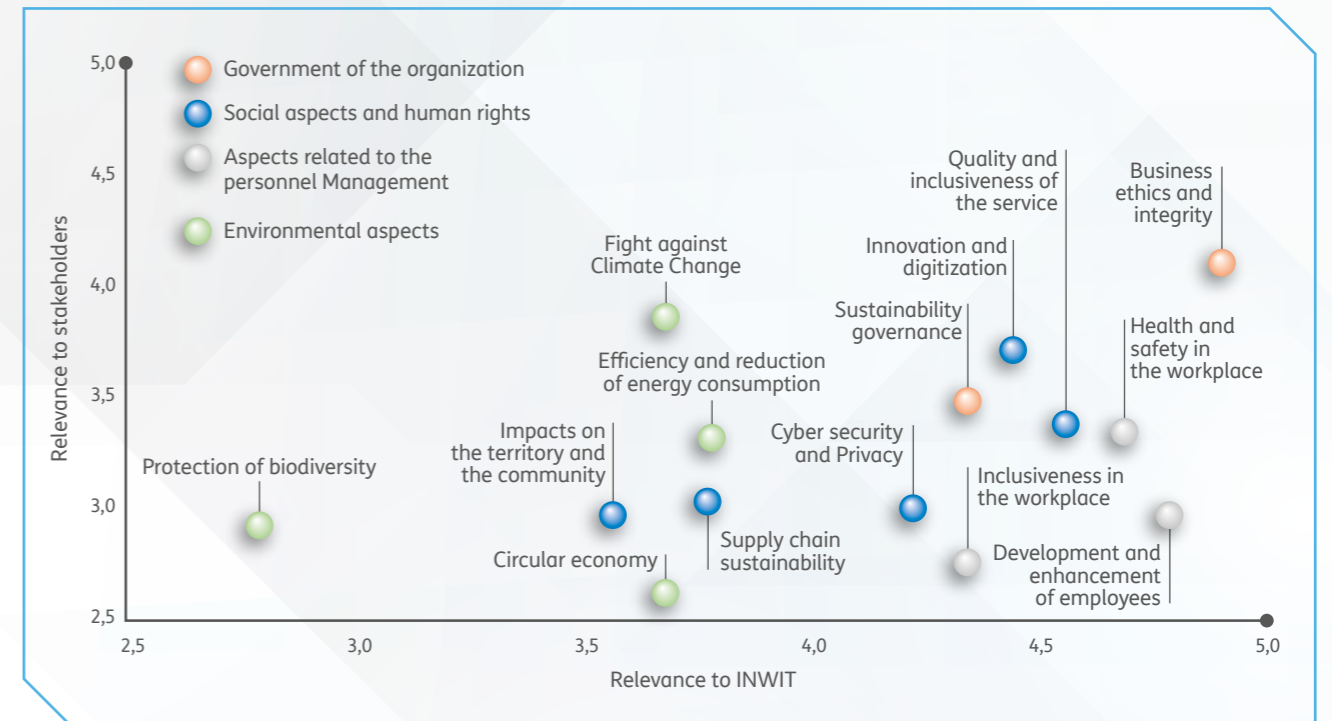


The selection of the new themes considered as materials was based on the results of a benchmark analysis on the main industry peers and best practices. The themes introduced this year are: “Sustainability Governance”, “circular Economy” (inserted as an evolution of the material theme of 2020 “waste Management”) and “Biodiversity Protection.” All the themes identified have been submitted to the evaluation of the Top Management, through a survey that provided for the assignment of scores for each of the themes submitted to evaluation. This process has made it possible to define the relevance of material issues for INWIT in social, environmental and governance terms. Likewise, in order to define **the relevance for stakeholders**, the themes have been submitted, always through the realization of a survey, to the evaluation of the employees and collaborators of INWIT and of all the other categories of external stakeholders. The results of the votes, held at the first INWIT stakeholder forum in May 2021, were also considered for the definition of relevance for stakeholders. .

The combination of the results obtained from the evaluations was used for the construction of the Materiality matrix, which identifies the themes considered “material” for INWIT and on which the contents of this Non-Financial Statement will be concentrated. In particular, the Materiality matrix shows on the horizontal axis the relevance of each material theme for INWIT and on the vertical axis the relevance of the same to the stakeholders.

¹ The categories of external stakeholders that have responded to the questionnaire are: Business partners and suppliers, customers, investors, shareholders, media, local community, associations and think tanks.

Figure 5 Materiality 2021 matrix



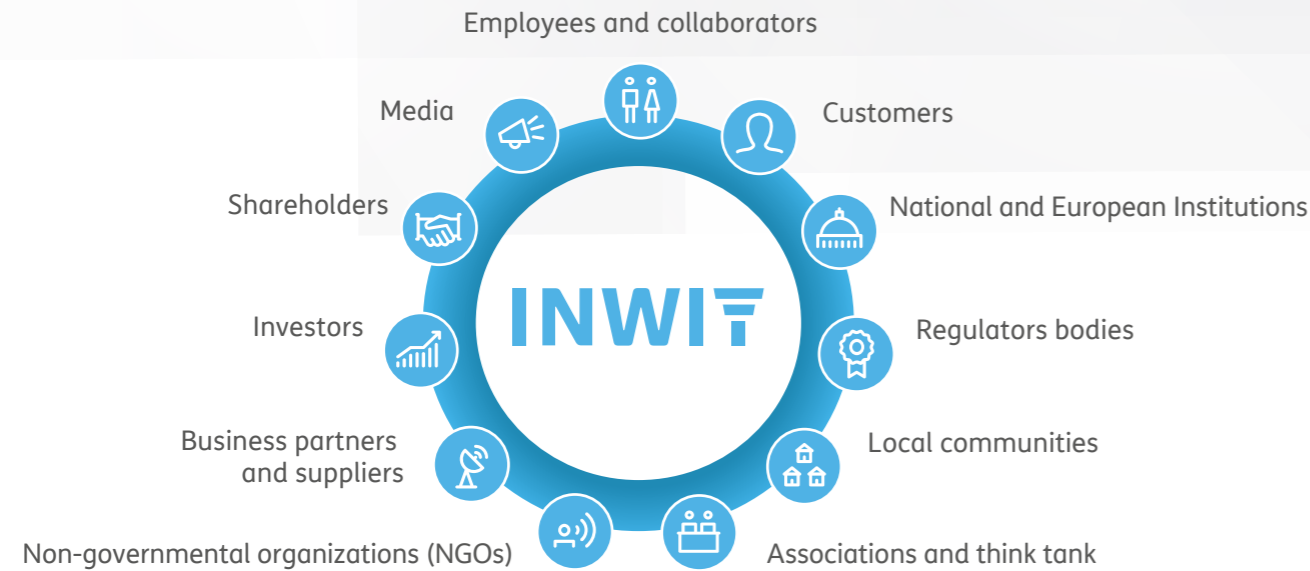
In line with industry trends, INWIT’s Materiality Matrix shows that “Business Ethics and Integrity”, “Innovation and digitization”, “Health and Safety in the workplace” and “Quality and inclusiveness of the service” are most relevant. In general, the material themes are also consistent with the sustainability plan, as shown in the link table in the annexes, demonstrating INWIT's strong commitment to listening to its stakeholders.



STAKEHOLDER ENGAGEMENT

GRI 102-47

Figura 6 Mappatura degli stakeholder



Starting from the awareness that relations with stakeholders are an integral part of a responsible and sustainable management of the business and are fundamental in the process of creating value for the company, INWIT has embarked on a path aimed at strengthening the engagement process with its stakeholders. The commitment to consolidate and strengthen relations with stakeholders, by virtue of a solid creation of value, is in line with the indications contained in the new Corporate Governance Code, applied from 2021 onwards. The new Code supports “sustainable success” in the creation of long-term value for the benefit of shareholders, taking into account the interests of other stakeholders relevant to the Company, and provides that it is the administrative body that promotes, in the most appropriate forms, the dialog with these stakeholders.

In line with the path taken, INWIT organized its 1st Stakeholder Forum on May 18, 2021.

The Forum was an opportunity to share with its stakeholders the sustainability path undertaken by the company since last year. During the day, participants were provided with ideas on both global and industry sustainability trends, including the importance of strong governance, the role of the digital transition in combating climate change and the need to implement concrete action on gender equality.

The event ended with an active moment of dialog with the stakeholders involved, representing the different mapped categories, with reference to the material themes for INWIT; They were asked to express their views on how these issues affect the Company's ability to create value in the short, medium and long term. As stated above, this exercise was taken into account when updating the INWIT Materiality 2021 matrix.

GOVERNANCE

GOVERNANCE STRUCTURE AND COMPOSITION OF THE CORPORATE BODIES

GRI 102-16, 102-18, 102-22

In carrying out all its activities, the members of INWIT's social bodies comply with the applicable law, the organizational model 231, the Code of Ethics and Conduct adopted by the Company, the Statute and the Code of Borsa Italiana, the Anti-Corruption Policy, the principles of self-regulation and the rules governing the functioning of the social bodies.

It should be noted that during 2021, the Company completed the process of adapting corporate governance documents to the Corporate Governance Code, to the national legislation transposing the EU Directive 2017/828 (so-called Shareholders Rights II). As well as the Consob Regulation on transactions with Related parties updated in December 2020. Extensive information is provided in the Report on Corporate Governance and the Ownership structure.

In the following paragraphs a detailed description is given of all the bodies, rules and models of each level that govern the company structure, therefore the functioning of the corporate bodies, their composition, interrelation, powers and responsibilities.

Corporate Governance system

INWIT's corporate governance system is organized according to the traditional model, according to Articles 2380 and ss. of the Civil Code, and in compliance with national and international best practices. It's divided as follows.

The **Board of Directors** consists of 13 directors, of which 6 women and 7 men, 9 over the age of 50 and 4 between 30 and 50. 5 directors, 3 of whom have been appointed from the list presented by a group of savings management companies and international investors; 12 directors are non-executive; The executive role is solely the responsibility of the Chief Executive Officer. The Board of Directors will remain in office until the Shareholders' Meeting of approval of the financial statements for the financial year 2022².


The Board of Directors is responsible for assessing the adequacy of the organization, administrative and general accounting arrangements of the company. It plays a strategic direction and supervision role, pursuing the primary objective of creating value for the shareholder and for all other stakeholders in a medium to long-term horizon.

² This composition refers to the Board of Directors which took office on March 31, 2020 following the merger of Vodafone Towers S.r.l. into INWIT. Before March 31, 2020, it was composed of 11 administrators, of which 5 women and 6 men, 10 over the age of 50 and 1 between 30 and 50. 6 directors were in possession of the independence requirements of the TUF. On October 2, 2020, the Board of Directors appointed two new directors to replace two retired directors, maintaining the gender distribution unchanged. di indipendenza previsti dal TUF. Il 2 ottobre 2020 il CdA ha nominato due nuovi amministratori in sostituzione di due amministratori dimissionari, mantenendo invariata la distribuzione di genere.

The Directors play their role in the collegiality of the Board of Directors, or in committees organized by the Board of Directors. Any exceptional requests for data, documents and news made outside of the collegial moments are addressed to the Chairman of the Board of Directors, who ensures that they reflecting in the most suitable modalities to ensure the functionality of the instructor and informative processes.

Table 2 Percentage of Board members by gender and age group as at 31 January 2021 (GRI 405-1)

Percentage of Board of Diretion by gender and age group at 31.12.2021				
	< 30 years	In 30-50 years	> 50 years	Total
Man	-	15%	38%	54%
Women	-	15%	31%	46%
Total	-	31%	69%	100%

A **Committee on Appointments and Remuneration** has been set up within the Board (responsible for tasks and responsibilities assigned by the Corporate Governance Code to the Appointments Committee and the Remuneration Committee) **a Sustainability Committee, Control and risk Committee and a Related parties Committee**, whose functions are described in the Company's Self-discipline principles (published in www.INWIT.it  section Governance). The Board of Directors is also responsible for ensuring that the Non-Financial Statement (DNF) is drawn up and published in accordance with the provisions of Legislative Decree no. 254/2016.

The Board of Statutory Auditors is called upon to *monitor, inter alia*, compliance with the law and the Statute, as well as respect for the principles of proper administration in the performance of social activities and the overall adequacy of the risk management and control system (described below). The College manages the reception, conservation and processing of reports, complaints even by employees and anonymously. The Board of Statutory Auditors will remain in office until the Shareholders' Meeting of approval of the financial statements for the financial year 2023.



APPOINTMENT AND REMUNERATION COMMITTEE:

consisting of the Board of Directors and is composed by 3 non-executive directors, of which 2 are independent; the Committee carries out the tasks and responsibilities assigned by the Corporate Governance Code to the appointment Committee and the Compensation Committee, and in addition:

- ▶ formulates to the Board of Directors proposals regarding the succession plan of the *Chief Executive Officer* if it is adopted by the Board of Directors and monitors the updating of the replacement tables of the company management;
- ▶ it defines the procedures and times for carrying out the annual evaluation of the Board of Directors;
- ▶ it proposes the criteria for fixing the annual total compensation established by the Assembly for the entire Council;
- ▶ it expresses proposals for *stock option plans* and remuneration of top management;
- ▶ it carries out the further tasks assigned to it by the Board of Directors.

The Committee may also address and make recommendations directly to the Chief Executive Officer and through the *Chief Executive Officer* to management, giving timely notice to the Chairman of the Board of Directors.

SUSTAINABILITY COMMITTEE:

consisting of the Board of Directors on 23 April 2020, composed of 5 non-executive directors, of which 2 are independent; members of the control body may assist in the meetings of the Committee. The Committee shall be a body with advisory and proactive functions which shall meet as often as is necessary for the performance of its functions, as follows:

- ▶ monitors compliance with corporate social responsibility rules, as well as national and international regulatory developments and best practices in this field;
- ▶ formulates proposals to the Board of Directors on sustainability strategies and the sustainability plan, monitoring their implementation on the basis of the objectives set out in the plan and evaluating their updating at the end of each financial year;
- ▶ monitors the consistency of INWIT's objectives and management with environmental, social and corporate sustainability (ESG) criteria, as well as sustainable finance initiatives, the Company's position in the ethical sustainability indexes and the Company's non-profit strategies.

The Committee has the right to express address and recommendations directly to the *Chief Executive Officer* and through him to management, giving timely communication to the Chairman of the Board of Directors.

CONTROL AND RISKS COMMITTEE:

consisting of the Board of Directors and composed of 5 non-executive directors, of which 3 are independent. The members of the supervisory body may attend meetings. The Committee and the Board of Statutory Auditors shall meet together where deemed appropriate in relation to the matters to be dealt with. The Committee is a body with advisory and proactive functions, which has, among other things, the task of supporting the Board's assessments and decisions on the Internal control and risk Management System, as well as those relating to the approval of the financial report. The Committee carries out the tasks assigned by the Corporate Governance Code and also:

- ▶ monitors compliance with corporate governance rules, as well as regulatory developments and best practices in this area, including for the purpose of proposing the updating of the Company's internal rules and practices;
- ▶ instructs the financial and non-financial communication of the period, with a view to the examination by the Board plenum;
- ▶ It carries out the additional tasks assigned to it by the Board of Directors.

The Committee may also address and make recommendations directly to the Chief Executive Officer and through him to management, giving timely communication to the Chairman of the Board of Directors.

RELATED PARTIES COMMITTEE:

consisting of the Board of Directors on 23 April 2020, it is composed by 3 independent directors and carries out the tasks and responsibilities assigned by the procedure for carrying out transactions with Related parties and by the CONSOB Regulation.

ORGANISMO DI VIGILANZA (DI SEGUITO "ODV"):

From 5 May 2020, it performs the functions of Legislative Decree no. 231/2001. Composed by 4 components, the body, as foreseen by art. 6 of Legislative Decree 231/01, has the task of "monitoring the functioning and the observance of the organizational model and to take care of its updating". The tasks assigned to the Supervisory Body require that the latter be provided with autonomous powers of initiative and control. The body has the following characteristics:

- ▶ The unquestionable choice of the supervisory body by the institutions of the body itself, otherwise the essential requirement of autonomy is to be reduced;
- ▶ The position of independence of the members of this supervisory body is reserved for those who are absolutely reliable on the basis of the professionalism demonstrated and the personal skills recognized by them.

By using the Audit and Compliance functions, the Supervisory Body is activated with specific analysis and verification activities in the following ways:

- ▶ interventions according to specific monitoring plan approved by the supervisory body, also in view of the results of risk assessment activity;
- ▶ targeted interventions (spots) in case of:
 - ▶ specific request made by the supervisory body and/or other "governance bodies" of each organizational reality;
 - ▶ elements of attention deriving from the information flows currently operating within the framework of the organizational models.

CODE OF ETHICS AND CONDUCT

The **Code of Ethics**, identified as the founding component of the Company's organizational model and Internal control and risk management system, is located upstream of the entire Corporate Governance system and represents the INWIT Charter of values, founding, in programmatic terms, the principles that inspired the actions of the members of the corporate and management bodies, the business partners, as well as internal and external collaborators. The Code of Ethics is therefore a tool through which INWIT directs its business activities for a business conduct following values and principles: Ethics and compliance, health and safety, human resources, community, communication, competition and service excellence (more explained in the following infographic).

Figure 7 INWIT's values



Source: Code of Ethics

The Code includes the rules of conduct to be observed in the conduct of internal and external activities and the resulting relationships and provides indications to be adopted in the event of reports on the correctness of the behavior.

The Code is periodically reviewed and eventually updated by the Board of Directors of INWIT. The Code was last updated with a resolution of the Board of Directors on December 16, 2021, to strengthen the compliance with the rules for the protection of competition and the principles of segregation of roles and of commercially sensitive information.

ORGANIZATIONAL MODEL 231

In order to ensure that the behavior of all those who work on behalf of or in the interests of the Company is always in conformity with the principles of legality, correctness and transparency in the conduct of business and business activities, INWIT has provided an organizational model of Internal control and Management according to Legislative Decree 231/01. In particular, the organizational model is the result of an accurate analysis of the business processes may be considered at risk of transgressions of the Decree, which can be identified in the areas of activity, with the involvement of the competent company structures.

The company ensures for all employees, modules, activities and training initiatives on themes listed by ex Legislative Decree 231/01:

- ▶ Targeted training, specifically aimed at updating the competences related to D. 231/01 of the most involved business roles both in terms of responsibilities defined in the organizational model and in terms of direct relations with public entities and third parties in general;
- ▶ widespread training aimed at the entire company population;
- ▶ training for new hires.

During 2021, information sessions about *Compliance & Business Ethics* were held to the corporate population with a focus also on liability ex Legislative Decree 231/01 and *whistleblowing offenses*.

The training is designed and implemented in accordance with the Compliance and Human Resources training structures.

Since its establishment, INWIT has adopted the organizational model of the Telecom Italia Group. On May 15, 2019, the Board of Directors approved an autonomous organizational model, as last updated on March 4, 2021 in order to incorporate the organizational changes and to include the cases introduced by L. D. 105/2019, as converted into law n. 133 on November 18, 2019 (“Conversion into law, with amendments, of Law-Decree n. 105, September 21, 2019 laying down urgent provisions on the perimeter of national cyber security”).

The organizational model ex Leg. Decree. 231/01 is divided into:

- ▶ **Codice Etico e di Condotta;**
- ▶ **Parte Generale:** contenente una breve descrizione della Società, dei contenuti e delle finalità del Modello 231 e della metodologia utilizzata per la sua implementazione, delle funzioni dell’OdV e del sistema whistleblowing adottato. Nella parte generale sono inoltre richiamate le iniziative per la diffusione e conoscenza del Modello 231 e il sistema disciplinare.
- ▶ **Parti Speciali:** ciascuna parte speciale identifica un processo a rischio nel cui ambito sono individuate le aree sensibili e i relativi reati presupposto. Inoltre, sono riportati gli standard di controllo, suddivisi in principi generali di comportamento e principi di controllo specifici.
- ▶ **Elenco dei reati:** contenente l’elenco complessivo dei reati presupposto previsti dal d.lgs. 231/01.

From January 2022, a new process of updating the 231 will be launched to ensure its suitability for organizational changes and regulatory changes.

No significant sanctions for non-compliance with social and environmental laws and regulations emerged in 2021 .

RISK MANAGEMENT SYSTEM (ERM)

GRI 102-15

In compliance with the principles and criteria of the Italian Stock Exchange Self-Regulatory Code, INWIT has adopted a Internal control and risk management system, defined on the basis the best practices of reference, aimed at allowing - through an identification, measurement process, management and monitoring of the main risks - a correct and consistent business management with the objectives set, in compliance with the Code of Ethics and the principles of self-discipline of the Company approved by the Board of Directors.

It is an integral part of the general organizational structure of the Company and includes a many actors acting in a coordinated way according to the responsibilities, respectively: strategic supervision of the Board of Directors and of the Chief Executive Officer, and monitoring and support the Chairman of the Audit and risk Committee and the Head of the Internal auditors function, of the Board of Statutory Auditors' supervision. The Board of Directors shall bear **the overall responsibility of the Internal control and risk management system**, including the definition of the nature and level of risk compatible with the specific strategic objectives of the company.

Enterprise risk Management

INWIT has its own risk management system, defined on the basis of the best practices of reference, aimed at allowing - through a process of identification, measurement, management and monitoring of the main risks - a sound, correct and consistent business management with the objectives set, in compliance with the Code of Ethics and the principles of self-discipline of the Company approved by the Board of Directors.

The Company has adopted a dedicated Enterprise risk Management framework (ERM), wich is designed to identify and evaluate potential events that may occur to influence the achievement of the main business objectives defined within the strategic plan.

The INWIT ERM framework is declined in a cyclical process - carried out annually - that begins with risk identification, intended as a list of risks that could affect the Company in terms of achieving the objectives and/or developing the business activities. Risk identification is based both on “desk” analysis of the main business documents, industry documentation, and on direct comparisons with facility managers to intercept any emerging risks or intercept evolutions on the impact of existing risks.

These risks are subject to a risk Evaluation:

- ▶ Risk assessment at inherent level, by identifying the levels of impact and probability of occurrence, assuming the absence of control presides and subsequent selection of the inherent Top risks, understood as the risks with higher level of inherent risk.
- ▶ *Risk Analysis* on a selection of risks that have an impact on the plan objectives, through risk quantification (*sensitivity*) and the determination of the expected impact per year and cumulated on certain variables.
- ▶ Residual risk assessment for the relevant Top risks, by evaluating existing control assets and determining the residual risk level, combining the impact and probability values following application of the reduction coefficient calculated on existing assets. Selection of residual Top risks due to the positioning on the residual risk matrix (impact*probability following application of the assets) and the acceptability levels.

³ INWIT's analysis has defined 10.000€ as significant threshold.

Mitigation actions (*risk Mitigation*) are identified for each residual Top risk determined during the risk Evaluation phase. Periodically monitored to ensure risk Owners take responsibility for agreed mitigation actions and enable escalation to the Business Summit for actions that have not been completed or are significantly delayed. The process ends with quarterly reporting to the Top Management (*risk Reporting phase*) for each topic developed as part of the risk Management process, including guidance on the progress of Action Plans and in-depth analysis of specific risks.

The following are material topics, key risks, and management methods for each area of Legislative Decree 254/2016:

Leg. Decree 254/2016 area	Relevant topics	Risks	Risk management	Opportunities
FIGHT AGAINST ACTIVE AND PASSIVE CORRUPTION	Cyber Security and Privacy	GDPR Directive (Privacy)	The company safeguards risk through dedicated facilities and processes to ensure the adequacy of business processes to applicable General Data Protection Regulation (GDPR)	An opportunity to assess business resilience to cyber attacks (like a stress tests that help top management decisions)
		IT continuity, Information & Cyber Security	IT security management is ensured through suitable ICT systems and, where necessary, the use of certified third parties to carry out specific activities (e.g. vulnerability assessment, penetration test)	Awareness and alignment of employees on secure digital behaviors to protect business, data, and people
		Conflicts of Interest	The company manages the risk through the presence of a procedural framework (Code of Ethics, 231 Model and ad hoc procedures) as well as through the constant support of the structures dedicated to it.	
	Etica e integrità di business	Ex. Legislation Decree 81/2008 (health and safety)	The company monitors risk through dedicated structures and processes, with the aim of ensuring the adequacy of business processes to the applicable workplace health and safety legislation	Competitive advantage, resulting from exceeding mere compliance
		Environmental legislation	The company manages risk through dedicated structures and processes with the aim of ensuring the adequacy of business processes to the applicable environmental legislation	Improved positioning towards ESG indices and ratings
		Customer demand fulfillment/development anchor	The Company monitors risk by identifying specific agreements with anchor customers	
SOCIAL ASPECTS AND HUMAN RIGHTS	Quality and inclusiveness of service	Development / fulfillment demand	The company manages the risk through the conclusion of predominantly multi-year contracts with a high renewal rate. Furthermore, it certifies its Quality Management System according to UNI EN ISO 9001:2015 standards	Greater ability to attract customers by expanding the ability to develop business
		Site Activity continuity	The company manages the risk by defining the service level to be guaranteed through specific KPIs, constantly monitored by a dedicated structure	
		Maintenance activities	The company manages the risk through a uniform, centralized and planned management of maintenance activities	
		Innovative business development	The company manages risk through the implementation of a specific process guided by a dedicated structure, aimed at identifying new opportunities for coordination with other corporate structures	Helping to improve the network and reduce the digital divide
	Commitments Remedies	The company manages the risk through the implementation of the so-called transparency Register procedure provided by the EC, which is continuously monitored by a third party		
	Sviluppo e valorizzazione dei dipendenti	Organizational model evolution	The company is responsible for the risk through the definition of appropriate internal development strategies or market skills acquisition	
		Key Manager Management	The company manages the risk through the preparation of succession plans, performance management, incentives, integration and development	
		Attraction and maintenance of resources	The company manages risk through the preparation of integration, development and growth plans	
Ex Legislative Decree 81/2008 (health and safety)		The company monitors risk through dedicated structures and processes with the aim of ensuring the adequacy of business processes to the applicable workplace health and safety legislation		
Health and safety at work	Injuries	The company manages risk through continuous monitoring and optimization of the headmasters to mitigate the risk of injury to both internal and third-party employees		
	Physical protection of immovable property	The company manages the risk through the identification of specific sites, aimed at managing access to sites by limiting them to authorized personnel		

Leg. Decree 254/2016 area	Relevant topics	Risks	Risk management	Opportunities
STAFF-RELATED ASPECTS	Inclusiveness in the workplace	Key Manager managing	The company manages the risk through the preparation of succession plans, performance management, incentives, integration and development	Specific development opportunities for sub-represented categories Inclusive work environment increases productivity and membership
		Attraction and asset maintenance	The company manages risk through the preparation of integration, development and growth plans	Policies of gender rebalancing, shared parenting and inclusion of diversity
	Efficiency and reduction of energy consumption	Technological evolution	The company manages the risk through the adoption of technical solutions adapted to constantly monitored changes and market needs, also through the identification of dedicated structure and implementation of specific processes	Lower energy costs Transition to less impactful production levels
		Energy supply and management	The company manages the risk through the implementation of a specific process guided by a dedicated structure, aimed at managing issues related to energy supply	Exploitation of State incentives, tax relief, etc.
ENVIROMENTAL ASPECTS	Fight against climate change	Site continuity	The company manages the risk by defining the service level to be guaranteed through specific KPIs, constantly monitored by a dedicated structure	
		Business continuity	The Company monitors risk by defining practices and procedures to ensure a high level of resilience	
		Energy supply and management	The company manages the risk through the implementation of a specific process guided by a dedicated structure, aimed at managing issues related to energy supply	Use of new products and services related to climatic requirements capable of generating operational efficiencies (e.g. use of renewable energy) and reduction of related costs
		Maintenance activities	The company manages the risk through a uniform, centralized and planned management of maintenance activities	New opportunities for access to the capital market (e.g. green bond, sustainability-linked loan)
		Site capacity management	The company manages risk through the development of tools to efficiently manage site capacity (physical and electromagnetic)	Reduced exposure to future increases in fossil-fuel energy prices
		Injuries	The company manages risk through continuous monitoring and optimization of the headmasters to mitigate the risk of injury to both internal and third-party employees	Return on investment in low-emission technologies Possible reputational advantages linked to the company's contribution to GHG reduction and climate objectives, also in relation to ESG ratings/rating agencies
		Technological evolution	The company manages the risk through the adoption of technical solutions adapted to constantly monitored changes and market needs, also through the identification of dedicated structure and implementation of specific processes	Access to new incentives
		Physical protection of immovable property	The company manages the risk through the identification of specific sites, aimed at managing access to sites by limiting them to authorized personnel	
		Environmental legislation	The company manages the risk by ensuring regulatory compliance through the appropriate business structures.	

Leg. Decree 254/2016 area	Tematiche rilevanti	Rischi	Gestione del rischio	Opportunità	
ENVIROMENTAL ASPECTS	Circular economy	Environmental legislation	The company manages risk through dedicated structures and processes, with the aim of ensuring the adequacy of business processes to the applicable environmental legislation		
		Waste management	The company manages the risk by ensuring regulatory compliance through the appropriate business structures	Ability to contribute to recovery and recycling targets with consequent reputational benefits Possibility of carrying out industrial symbiosis activities Supply of Raw materials second at lower costs than virgin Raw materials	
		Suppliers' selection	The company manages the risk through the presence of a procedural framework (Code of Ethics, 231 Model and ad hoc procedures) as well as through the constant support of the structures dedicated to it	Decrease in disposal costs	
		Realization of new infrastructures	The company monitors the risk through analysis of the suitability of the site for the construction of the sites and the appropriate choice of suppliers		
	Sustainability governance	Legislation Decree 81/2008 (Health and Safety)	The company monitors risk through dedicated structures and processes with the aim of ensuring the adequacy of business processes to the applicable workplace health and safety legislation		Strengthening the control of non-financial risks
		Environmental legislation	The company manages risk through dedicated structures and processes with the aim of ensuring the adequacy of business processes to the applicable environmental legislation		Promotion of an approach aimed at integrating ESG themes into the company strategy Improvement in positioning toward ESG indices and ratings
		Organizational model evolution	The company is responsible for the risk through the definition of appropriate internal development strategies or market skills acquisition		Outlook on future sustainable development policies
	Protection of biodiversity	Environmental legislation	The company manages risk through dedicated structures and processes with the aim of ensuring the adequacy of business processes to the applicable environmental legislation		Mitigation effects Climate change and minimization of environmental impacts
		Realization of new infrastructures	The company monitors the risk through an analysis of the suitability of the site for the construction of the sites and appropriate choice of suppliers		Improved brand reputation

In addition, the risks connected with the Objectives deriving from the Sustainability Plan and the impacts deriving from the failure to achieve/partial achievement of these objectives, and the risks deriving from the legislation pursuant to Legislative Decree 231/01 in terms of inadequate implementation of the legislation regarding the administrative liability of entities and the associated crimes are also considered, across the board with regard to most of the relevant issues listed above. These risks are managed by means of monitoring aimed at verifying constant alignment with the provisions of the Sustainability Plan and the updating and implementation of the 231 Model adopted.

With respect to the relevant issue related to combating climate change, a Scenario Analysis considering ERM risks (physical and transitional) and opportunities associated with climate change was conducted in 2021. For further details, reference should be made to the section "Climate Change" in Natural Capital. With reference to emerging risks, reference should be made to the Report on Operations, in the section describing "risks and uncertainties".

PREVENTION OF CORRUPTION

GRI 205-1, 205-2, 205-3

With a resolution of the Board of Directors of 16 December 2021, INWIT adopted its anti-corruption policy, to manage risk according to the “zero tolerance” principle. Based on the best practices and national and international regulations the policy has been developed *ex novo* taking into account INWIT's most vulnerable areas of risk of corruption and defines company's roles and responsibilities. According to legal or contractual requirements, the policy is addressed to all the company population; it is published on the company portal as well as on the company's website. In addition, the Anti-Corruption Policy was appropriately shared with the Board of Statutory Auditors.

During 2021, all 13 members of the Board of Directors, all INWIT's executives and employees received communication on anti-corruption policies and procedures. In addition, compliance and business ethics training sessions were provided to the company's population, with specific focus on liability under Legislative Decree 231/01 and related predicate offenses, anti-corruption in the public and private sectors and conflict of interests. In order to strengthen the efficiency of the Policy requirements, the contractual clauses with the suppliers contain appropriate communications in this respect.

The main corruption risk areas identified and mentioned in the policy are:



Anti-corruption due diligence is also expected on third parties.

Any violations, even suspected, of the anti-corruption policy can be reported through the whistleblowing channels (described below).

No operations were assessed for corruption-related risks in 2021, and there were no confirmed incidents of corruption. As part of ERM's risk assessment, corruption risks are identified primarily in the risks of potential fraud conducted to the detriment of the company, as well as in the implementation of regulation 231 (with particular reference to relations with location owners, suppliers, sponsors and the management of extraordinary transactions). Both risks are subject to annual assessments by ERM.

WHISTLEBLOWING PROCEDURE

To integration of art. 4 of the Code of Ethics and Conduct - which defines guidelines for requesting clarification or reporting of alleged violations of the Code - INWIT has a Whistleblowing procedure (issued in 2019 and updated in 2020), with the purpose of regulating the process of receiving, analyzing and processing (including filing and deletion) of reports, by anyone sent or transmitted, concerning conduct, whether or not omissive, that is not compliant with laws and regulations, which are applicable to INWIT, as well as to the system of rules and procedures in force in the company, These include the Code of Ethics and Conduct and the 231 Organizational Model.

Complaints received by the Board of Statutory Auditors are into Whistleblowing system.

The reports may cover:

- 1 Requests for clarification on the correctness of behavior of others or their own in order to fully comply with the Code of Ethics and Conduct
- 2 Communications of alleged violations, requests or claims for violation of laws or regulations, Code of Ethics, internal procedures (e.g. non-compliance with contractual clauses, defamation, threats, fraud, misuse of company equipment)
- 3 Communications of alleged violations of the 231 organizational model as a result of criminal and/or illicit risk behavior provided for in the 231 organizational model
- 4 Complaints relating to alleged findings, irregularities and censurable facts
- 5 Complaint concerning accounting issues, internal accounting controls, or auditing matters by anyone coming from, as well as concerns submitted by Company employees concerning the same accounting or auditing matters considered questionable accounting or auditing matters

INWIT's supervisory body 231 is the owner of the reporting process, which in turn uses the Head of the Audit Department to manage reporting.

The process is carried out by the Audit function in full compliance with the principles established by the International Standards for Professional practice of Internal Audit and by the Code of Ethics issued by the Institute of Internal Auditors (IIA), as well as by the Company's Code of Ethics and Conduct.

Where the report concerns a member of the supervisory body, the investigation and the subsequent analyzes shall be managed by the other members of the same Supervisor Body.

If the entire supervisory body or most of its members (3 out of 4) is involved, the inquiry is managed by the Chairman of the Board of Directors and the Board of Statutory Auditors.

During **2021 the company received 5 anonymous reports**, which were taken in charge by the Supervisory Body and preliminarily examined in order to assess, in general terms, their relevance as well as any different management responsibility (e.g. if under the responsibility of the Board of Statutory Auditors). The reports were analyzed by the Audit function and, after the conclusions formulated by the same Supervisory body, reported to the Board of Directors of the Company in the SB Annual Report.

Through the Audit Department the Supervisory Body sends a monthly report on all reports received in the reference period to the Board of Auditors, without prejudice to the timely communication of the results of the analysis of the individual reports, should there be any elements of relevance.

In addition, the SB provides the Board of Directors with a complete summary of the reports received and of the activities carried out, in the half-Year Report, also forwarded to the Committee for Control and risks.

DATA PRIVACY

GRI 418-1

During 2021, the Company implemented its own *Data Protection organizational model*, approved by the Board of Directors. It also appointed the Data Protection Officer and implemented the Register of processing Activity. "Privacy contacts" have also been identified in each corporate function to guarantee a more effective and capillary application of the above model. In implementation of this Model, policies and procedures have been adopted regarding privacy by design and by default, data breach, management of data subjects' rights, risk analysis, data protection impact and system administrators. A risk analysis of processing operations was also carried out.

A "*Vademecum privacy*" has been prepared and training sessions have been organized to ensure effective understanding and dissemination of the regulatory principles and procedures adopted.

As part of the management of relations with third parties, including customers, special contractual clauses have been drawn up, which can be adapted to the specific case, as well as special information containing the rights exercised by the interested parties and the contact details of the DPO. The personal data of customers processed by INWIT - also through data processors appointed for this purpose - are, for the most part, common data such as, for example, personal data and contact details and for purposes connected with the execution of the existing contractual relationship with the Company or for market surveys.

Personal data are kept for the strictly necessary time for the pursuit of the purposes, unless otherwise provided by the law in specific cases (litigations, complaints, etc.). Finally, during 2021 there have no been recorded complaints regarding customer privacy breaches and data losses.



[FINANCIAL CAPITAL]



ECONOMIC AND FINANCIAL DATA

GRI 201-1

INWIT, through its activities, also contributes to the development of the areas in which it operates on the economic and social level.

	Exercise 2021 (€)	of which with parts related	Exercise 2020	of which with parts related
Revenue	785.149.790	685,687,000	663.407.600	588,742,000
Purchases of materials and services – ordinary charges	(44.190.760)	(6.678.000)	(33.459.618)	(14.658.000)
Purchases of materials and services – charges related to transactions amazing	(506.351)		(6.711.309)	
Personnel costs	(18.421.840)	(1,953,000)	(18.176.946)	(2.061,000)
Other operating costs - ordinary expenses	(5,121,221)	(1.325.000)	(1.278.532)	
Other operating costs - charges connected with extraordinary operations	(2.028.390)	(2.028.000)		
Operating income before depreciation, capital gains/ (losses) and impairment recoveries/(writedowns) Non-current assets (EBITDA)	714,881,228		603,781,194	
Amortization, capital gains/losses from realizable assets and write-downs of non-current assets	(360.131.609)		(313.081.410)	
Operating result (EBIT)	354.749.619		290.699.784	
Financial income	8.370		19.313	
Financial charges	(90.090.513)	(2,572,000)	(69.778.556)	(2,572,000)
Result before tax	264.667.476		220.940.540	
Income taxes	(73.271.800)		(64.273.773)	
Result of the period	191.395.676		156.666.767	
Result per base/diluted share	0.199		0.180	

DIRECTLY GENERATED AND DISTRIBUTED ECONOMIC VALUE

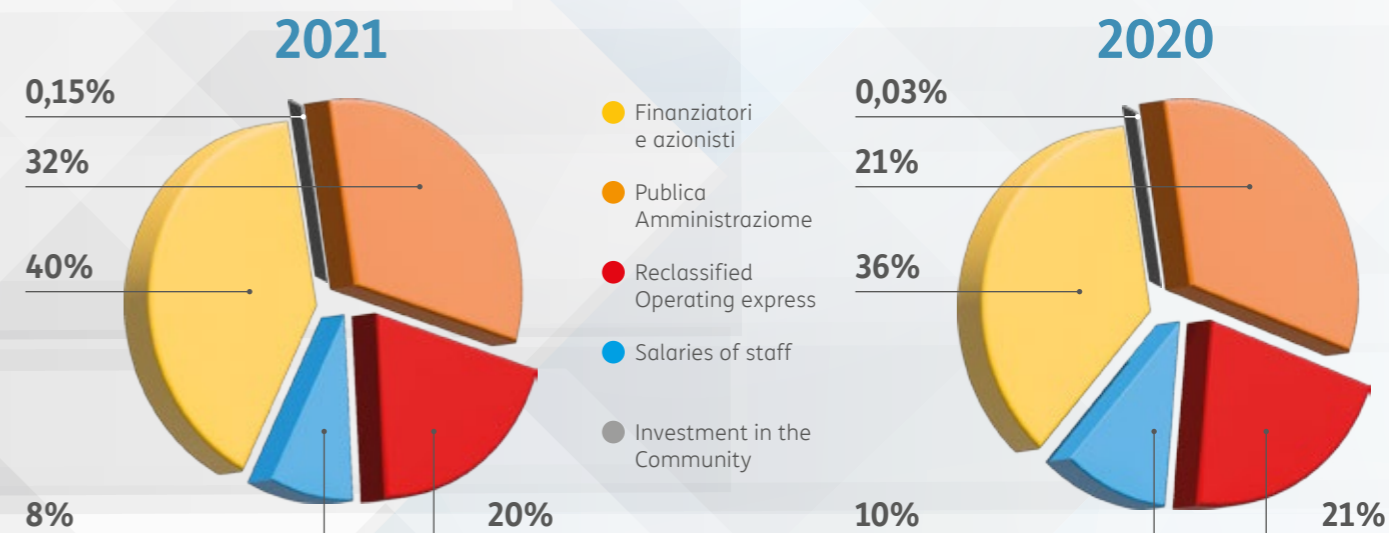
In line with the methodology defined by the GRI Sustainability Reporting Standards, a reclassification of the income statement was made to determine the wealth distributed by INWIT.

In 2021, all the items on the prospectus are significantly increased, compared to 2020. INWIT generated an economic value of more than **785 million euros**, an increase of 18% compared to the previous year.

	2021	2020	Delta
Generated economic value	785.158.160	663.426.913	18%
Distributed economic value	226.805.928	192.462.202	18%
Reclassified Operating expenses	44.697.111	40.170.927	11%
Staff remuneration	18.421.840	18.176.946	1%
Investments for the Community	332.664	62.000	437%
Funders and shareholders	90.082.513	69.778.556	29%
Public Administration	73.271.800	64.273.773	14%
Retained economic value	558.352.232	470.964.711	19%

The distributed value, in 2021 more than **226 million euros**, represents the organization's ability to respond, in terms of available resources, to the needs of its stakeholders, in particular to its suppliers of goods and services (reclassified Operating expenses), to its employees (staff remuneration), to the community (which is significantly increased in 2021 compared to the previous year), to funders and shareholders and public administration.

DISTRIBUTED ECONOMIC VALUE



Figures 4 Directly generated and distributed economic value (GRI 201-1)

As the graph shows, the largest share of value distribution in 2021 was allocated to funders and shareholders (40%), to public administration (32%), to suppliers of goods and services (20%), to staff remuneration (8%), and about 332.664 euros in donations, scholarships, and internships toward the community. For further information on performance and management of the economic and financial aspects, please refer to the 2021 Financial Report.

SUSTAINABLE AND SUBSIDIZED FINANCE

In April 2021, INWIT successfully completed its third bond issue, for a total amount of 500 million euros. In addition, it has signed a sustainability-linked term loan, linked to specific sustainability indices, for an amount of 500 million euros, with a duration of 4 years, with a pool of 4 financial institutions. The contract provides for the annual observation of specific KPIs and a mechanism for reducing or increasing the rate of the loan respectively upon the achievement or non-achievement of the set objectives.

The funds from the two operations will allow the pre-payment of the EUR 1 billion term loan currently in place, achieving the dual objective of extending the duration of the debt and reducing its cost.

According to INWIT's CEO, the success of these operations demonstrates the appreciation of INWIT's business by the capital market and strengthens the integration of sustainability objectives into the corporate strategy, in line with the Sustainability Plan.

In August 2021, a loan was signed with the European Investment Bank (EIB) in support of INWIT's investment plan for the development of digital infrastructures in Italy for the service of telecommunications operators. The project is in line with INWIT's industrial plan, which includes investments in building new towers for the distribution of 5G, in building indoor and outdoor mobile network coverings such as small cells and DAS (distributed Antenna System) systems and for the testing of new innovative technologies to support operators.

A network infrastructure that will also be available to host fixed Wireless Access (FWA) equipment, to extend fixed broadband coverage in areas with low population density. The 250 million euros transaction will enable INWIT to continue to optimize its debt structure, pursuing the objectives of extending its duration and reducing its cost.

TAXATION

INWIT operates exclusively in the national territory, it has no subsidiaries or branches abroad. The company is subject to taxation in Italy for all income generated and pays all taxes due under the current pro tempore legislation, operating in the formal and substantial respect of all the regulations, fiscal regulations and practices and by maintaining a cooperative and transparent attitude with the national tax authorities.

The tax processes are constantly supervised as they are monitored in the procedures defined by the Internal control system and integrated with the codes of conduct already adopted by the Company (e.g. Code of Ethics, 231 Organizational Model, System of Controls referred to in L.262/2005, etc.).

The aspects of the tax risk control and management fall within the wider category of non-compliance risks compared with the reference legislation in the management report.

The Board of Statutory Auditors supervises compliance with the law and the statutes, respect for the principles of correct administration and in particular the adequacy of the organizational, administrative and accounting structure adopted by the company and its concrete functioning, assuming the necessary resolutions provided for by the law in case of violations. The company's financial statements are subject to legal review.

Ultimately, proper management of the tax variable is essential to society. Its shareholders and all third parties interested in its activities since the taxes due by the company constitute an important part of the wider economic and social role that the company plays in the country and in the communities in which it operates.

Please, refer to the data in the Management Report for a detailed treatment of income taxes.

TAXONOMY

In June 2020, the EU Taxonomy Regulation 2020/852⁴ published by the European Commission, was adopted in national legislation to establish a framework to promote sustainable investment and achieve the EU's climate and energy objectives for 2030, as well as the objectives of the European Green Deal. The Taxonomy is a unified European system to classify sustainable economic activities, with the purpose, on the one hand, to introduce guarantees of comparability and transparency in the sustainable finance and green economy, on the other hand, to create a common language to all investors to participate in economic activities and projects with significant positive effects on climate and environment. All companies that fall under the obligations defined by the Taxonomy Regulation must disclose on how and to what extent their activities are associated with activities considered environmentally sustainable under the EU taxonomy. In this first year of implementation, disclosures must be prepared that include the share of taxonomy-eligible (or "Taxonomy - Eligible") and non-taxonomy-eligible business activities within its revenue, capital expenditures, and total operating expenditures made.

INWIT in line with the ESG performance disclosure commitments, has decided to carry out a voluntary analysis of the activities in relation to the objectives of "Climate Change Mitigation and Adaptation", respectively indicated in Annex I and II of the Climate Delegate Act, the only two objectives for which, now, thresholds, criteria and metrics have been established.

As this is the first year of new international legislation, all criteria and assumptions made and included in this paragraph are based on the information and requirements currently available, which may be subject to future review.

⁴ Of 18 June 2020 amending Regulation EU 2019/2088.

To determine the eligibility of economic activities, both the “Statistical classification of economic activities in the European Community” (NACE) and the descriptions of activities contained in Annex I and Annex II of the Climate Delegate Act were analyzed.

In accordance with the regulatory requirements of the Delegate Act relating to Article 8 of Regulation 2020/852, the following table shows the share of eligible and ineligible economic activities in the field of turnover, capital expenditure and total operating expenditure.

	Eligible under the European Taxonomy	Not permissible under the European Taxonomy
Turnover	0%	100%
Capital expenditures	1,5%	98,5%
Operating expenditures	0%	100%

The details of the capital expenditure which has been considered eligible are given below:

Assets – Capital expenditure	CAPEX 2021 (€)	Annex Taxonomia	Number of assets from taxonomy	Taxonomy activity
Installation of photovoltaic systems	222.174 €	Annex I - Climate change mitigation	7.3	Installation, maintenance and repair of energy efficiency equipment
		Annex 2 - adapting to climate change	7.3	Installation, maintenance and repair of energy-efficiency equipment
Installation of free-cooling systems	1.046.930 €	Annex I - Climate change mitigation	7.3	Installation, maintenance and repair of energy-efficiency equipment
		Annex 2 - adapting to climate change	7.3	Installation, maintenance and repair of energy-efficiency equipment
Installation of current rectifiers	1.891.635 €	Annex I - Climate change mitigation	7.6	Installation, maintenance and repair of renewable energy technologies
		Annex 2 - adapting to climate change	7.6	Installation, maintenance and repair of renewable energy technologies



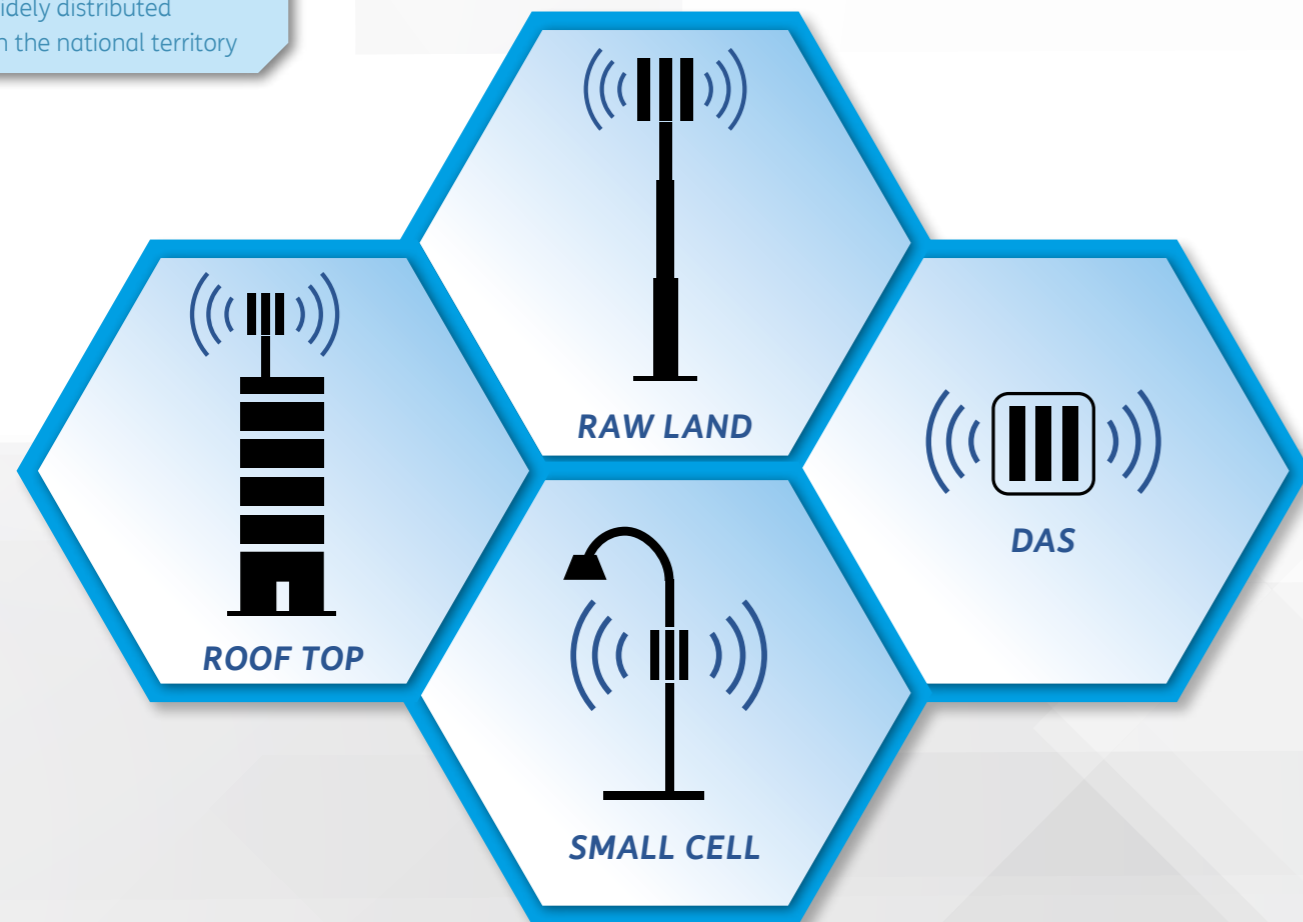
INFRASTRUCTURAL
CAPITAL



THE INWIT'S SERVICES

INWIT offers a variety of integrated services that allow to diversify the business. As the first Tower Operator in Italy, and as a neutral host, the core business of the company is identified in the offer of “integrated hospitality services” with almost 23.000 towers distributed throughout the national territory (one tower every about 3 km), characterized by proximity to customers, present both in urban and rural environment and most of them connected in fiber optics, making available to the anchor-tenants the infrastructures to realize wireless networks, towers and pylons for the antennas, cabling, parables, spaces for the equipment, technological systems for the power supply.

NEARLY 23,000 TOWERS
widely distributed
on the national territory



At the same time, INWIT has started the expansion of its business in the sector through infrastructures that guarantee a more effective reception of services for mobile telecommunications: small cells and DAS systems (Distributed Antenna System). These infrastructures increase the signal's reception of the mobile operators in particularly in crowded areas, where the signal coming from the antennas positioned on the macro-sites is not sufficient to ensure optimal reception. INWIT therefore makes new equipment available to operators to improve indoor and outdoor coverage, thus allowing an increasingly effective use of mobile devices.

DISTRIBUTED ANTENNA SYSTEM (DAS):



it is an indoor antennas' system, distributed within a structure, that transmits in full security a multi-operator cellular signal. The signal is generated by a central unit to which all the micro-antennas are connected, guaranteeing to locations of medium/large size with high density of people a capillary coverage. The DAS are characterized by voice and data traffic high dedicated and guaranteed capacity, by extremely small dimensions device and negligible environmental and electromagnetic impact.

SMALL CELL:



are the most suitable solution to offer cellular service in densely populated urban contexts, in areas where environmental constraints persist and areas where architectural decoration must be preserved, as well as the monumental/landscape heritage. Small cells are typically installed on streetlights, wall-mounted, camouflaged as shop signs/advertising totems, and have about 200 meters coverage range. Each small cell consists of an antenna and a radio apparatus, connected to each other by coaxial cables. The radio equipment, instead, are connected in fiber optic to the nearby telecommunications tower that serves as an edge aggregation point.

In this direction, INWIT has launched a coverage plan with small cell and DAS in selected areas with a high cultural and social value, through agreements with local authorities, stations, hospitals, airports, museums, universities, industrial plants, motorways, shopping centers, stadiums and places of aggregation and entertainment. As best described below, the use and development of these micro-plants is the basis of INWIT's innovation objectives and the growth of new 5G technology. Indeed, such facilities will be necessary to allow the coverage of the new network technology in particular in the environments indoor, where 5G frequencies will have more difficulty penetrating.

As of December 31, 2021, INWIT has 165 DAS projects, about 1.400 small cells and over 1.300 backhauling networks.

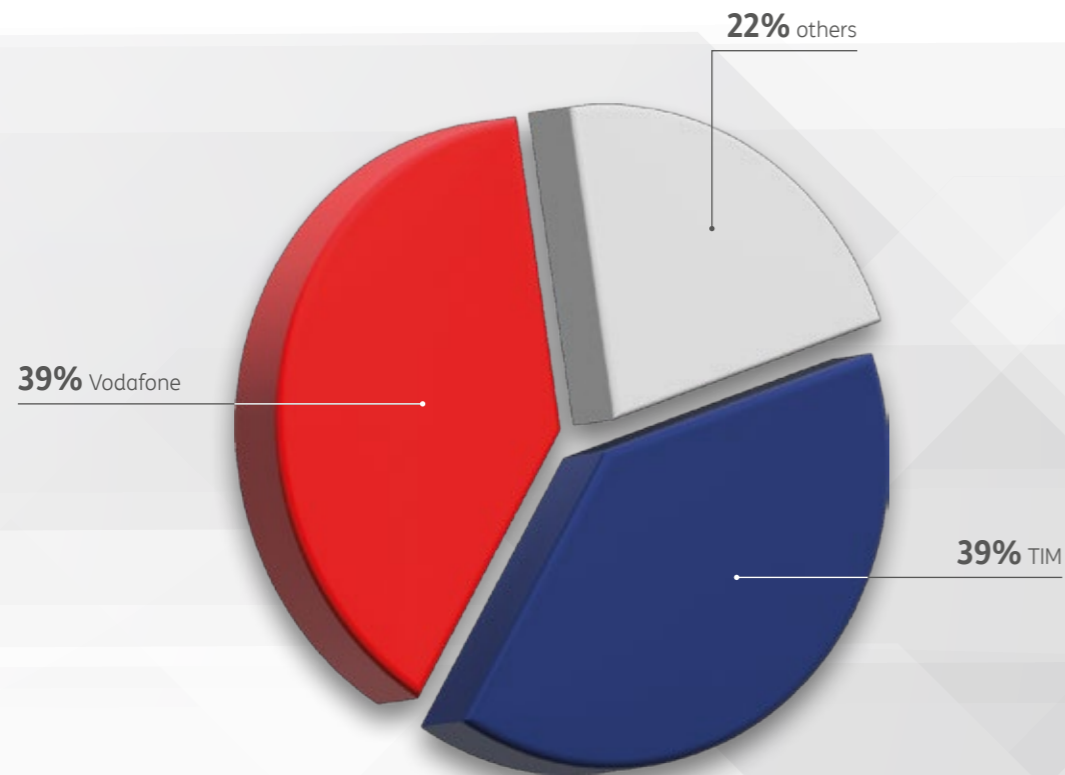
THE QUALITY AND SAFETY OF THE SERVICE AND THE RELATIONS WITH THE CUSTOMERS

QUALITY OF SERVICE

INWIT's main customers are:

- ▶ all national mobile radio Operators ("Mobile Network Operator" MNO): TIM, Vodafone, WindTre and Iliad.
- ▶ Fixed Wireless Acces (FWA) operators such as Linkem, Fastweb, Eolo, and Open Fiber, which provides mobile radio services based on GSM, UMTS, LTE technologies or radio transmission service licenses in other wireless technologies (e.g. Wireless Local Loop, Hyperlan, WiMAX, point-to-point and point-to-multipoint PDH and/or SDH);
- ▶ Operators of broadcasting services for radio and television signals transmission and diffusion (e.g. technologies in DVB-T standard); Institutions, public bodies, Armed forces for the creation of private networks.

Figure 8 % distribution of hospitalities at 31.12.2021



During 2021 INWIT renewed - as a result of audit activities - **the ISO 9001:2015 certification** regarding the process relating to the provision of integrated hospitality services for radio transmission equipment, for both telecommunications for the broadcasting of television and radio signals, the construction and/or decommissioning of sites, and marketing of multi-operator indoor roofs as well as ordinary/corrective and extraordinary maintenance of the indoor park indoor and outdoor sites, including special covers such as tunnels.

Maintenance activities

With the aim of ensuring high standards of service quality, INWIT has equipped itself with a qualified set of **proven systems of supervision and management**, as well as a network of own and third-party resources widespread throughout the national territory that allows to guarantee to its customers:

Maintenance activities:

- ▶ **Ordinary and corrective maintenance**
to ensure the adequacy and proper functioning of the infrastructure on sites.
- ▶ **Extraordinary maintenance**
aimed at maintaining the infrastructure's quality and performance standards (e.g. replacement of obsolete components, adoption of new systems with greater energy efficiency, etc.).
- ▶ **Site management**
to ensure accessibility and security.

These services are mainly aimed at prevention or prompt intervention in case of service interruptions, mainly related to power interruptions related to the electrical suppliers, as well as malfunctions of the technological systems (power supply and air conditioning systems). These interruptions are quantifiable in the order of about 15.000 cases per year. The restoration takes place through the supervision center that engages the electricity suppliers in case of interruption of service, and the maintenance companies that operate on INWIT behalf in the territory, in case of technological systems' disservice. The average frequency is quantifiable in about 0,6 to 0,7 cases per year per active site, and the average duration of disservices varies between 12 and 14 hours.

Customer experience

During 2021, INWIT provided a customer experience-specific monitoring function, called **Customer Insight & experience**, with the aim of defining tools, criteria, methods of measurement and evaluation of the quality of the service offered. The survey activity has been included in the INWIT Sustainability Plan, in correspondence with the activity "Developing a monitoring system of customer satisfaction", to reinforce the importance that the listening of a priority category of stakeholders and customers assumes, in order to develop and consolidate a technologically advanced and quality infrastructure.

Indeed, with company's support specialized in market research, a model of measurement of customer satisfaction has been designed with the objective of initiating systematic detection, from the year 2022.

In particular, two KPIs of interest have been identified, which are the subject of evaluation:

1

Net Promoter score

That provides a sort of global “loyalty measure”, obviously linked to all aspects of B2B interaction, but with a focus on intention rather than on the degree of immediate satisfaction.

2

Overall Satisfaction

That provides an evaluation of the Customer experience closely linked to functional aspects, both in terms of services and organization.

The joint evaluation of these two indices, which detect a mix of emotional and operational aspects, represents a quality’s optimal representation of the ongoing relationship between client and INWIT. The first survey campaign, scheduled for January 2022, will be the subsequent measurements’ benchmark.

As an additional measurement tool for *Customer Satisfaction*, it is also foreseen the integration within the commercial CRM system, under development, of a special module, powerful and flexible, that allows to conduct targeted survey campaigns (dedicated to specific customer or prospect groups, or to be administered downstream of commercial initiatives, launch of new services, particular initiatives, events, etc.) and to collect and process all information and returns from active and potential customers.

This application has a more operational scope and will aim to estimate a sort of **CSAT index**⁵, customizable according to the specific need, that provides a measure of the ‘here and now’ type compared to specific interactions with organization, the use of a service or the use of an event.

Cyber security

A full review of Information&Cyber Security (I&CS) procedures and processes was launched in 2021 and will be completed by 2022 with the definition of security discipline’s other assets.

The Company has appointed a **I&CS referent**, to whom functions and responsibilities have been assigned for the INWIT’s security information assets. In particular, this figure provides support to all business functions regarding cyber security issues and constitutes a focal point for advice/requests on I&CS issues with reference, in particular, to reports of potential phishing attacks. The I&CS referent works synergistically with the Risk&Compliance function for the functional actions to the regulatory compliance regarding the Cibernetica National Security Perimeter (L.133/2019 and its implementation DPCM).

The **Information Security Policy (ISP)** has also been defined and published based on which 4 operating procedures have been prepared relating to: *Management of System Administrator List on Application Systems, Verification of System Administrators, Account Review, Application Account Management*. In addition, corporate processes (PR) related to Security Incident Management and Security Assessment, as well as the *Cyber risk Management Reference Framework*, have been formally defined.

For INWIT, the purpose of Information Security Policy (ISP) adoption is to define guidelines and operating procedures aimed at sharing internally and making out the external awareness of INWIT’s posture toward the protection issues of its information assets, directing its continuous improvement.

The approach to information security is based on some general principles carefully described in the document, and INWIT information systems are protected from the risks of unauthorized access, theft, tampering and damage arising from physical and environmental threats.

⁵ Indicator for measuring Customer Satisfaction.

In order to ensure the complete alignment between its business strategy and the protection of corporate information assets, INWIT’s Top Management has defined **objectives in the field of Information Security**, aimed at protecting the latter in terms of confidentiality, integrity and availability. These objectives have been identified by INWIT considering both the strategic guidelines that the Company intends to pursue in the medium and long term, as well as the constraints, needs and opportunities arising from the context in which it operates. For the information security management, INWIT has adopted a cross-functional model consistent with the existing organizational model, articulated on different levels, each of which identified by a precise area of responsibility. In order to reduce the risk of handling critical information in an inconsistent manner, the company classifies the information according to their criticality and the relative treatment modalities, *in confidential, internal and public use*.

In order to ensure suitability, adequacy and effectiveness at all times, the Policy is reviewed on a periodic basis, at least annually or following specific events. A violation of the same involves disciplinary action against employees or the execution of penalties against third parties, if provided for in contracts of engagement.

Finally, the *Security Annex INWIT* is being prepared, with the main objective of constituting not only a general security guideline to be flanked by the ISP, but also and above all a contractual addendum in the agreements with the suppliers, with respect to rules and obligations, as personnel responsible in various forms and methods for handling Company data.



BUSINESS CONTINUITY

The emerging situation that occurred at the beginning of 2020 highlighted the need for companies to have a *Business continuity Plan*, which facilitates any critical events' management, ensuring a productive continuity and avoiding operational downtime.

In 2021 INWIT prepared its first **Business continuity Plan (BC)** according to the following Framework:

- **Business impact Analysis (BIA) & Risk Assessment** for identifying critical business processes, defining their recovery time, as well as critical support resources (buildings/facilities, personnel, IT applications and suppliers), with the aim of identifying and managing the main risks for operational continuity.
- Definition of **BC Strategies and Solutions**, with the aim of identifying the optimal BC strategy that meets the requirements of continuity of critical processes and resources.

An organizational model, roles and responsibilities have been defined for the management of operational continuity, following the occurrence of events involving INWIT, both in normal operating conditions and during an emergency/ crisis.

Moreover, the implementation of BC solutions has begun, which aim to implement, with the support of all stakeholders, BC strategies and solutions identified.

The analysis revealed **24 critical processes** for which recovery strategies or related procedures were developed, according to the following criteria:

- whenever “ready-to-go” strategies and procedures could be identified, they were documented in recovery procedures (24 PR), organized by scenario (location unavailability, personnel, IT applications, vendors), in order to define the actions to be taken to restore the operation of critical resources / process affected by the event / interruption.
- if they are “not ready-to-go”, actions have been planned to support them, inserted in the Master Plan so that these strategies are finalized and made operational through specific actions.

During 2022 the implementation of **specific actions** foreseen in the Master Plan will be completed and the procedures for training critical resources will be started. At the same time, the monitoring and review phase of the different elements of the plan will begin to ensure continuous improvement and consolidate the plan over a couple of years.



[INTELLECTUAL CAPITAL]



INNOVATION

For INWIT, innovation and digital transformation are strategic levers to enhance technological know-how and assets and to foster a development that fully integrates all three dimensions of sustainability, economic, social and environmental. INWIT 's goal, as per the Sustainability Plan, is to be an actor, in support of the operators, in the digitization of the country, contributing significantly to the wireless coverage of the Italian territory, also in function of the development of new technologies, starting from 5G and FWA.

“LANDSCAPE SAFEGUARD AND INCREASINGLY CONNECTED ENVIRONMENTS:
THIS HOW WE COMBINE INNOVATION AND SUSTAINABILITY”
Giovanni Ferigo, INWIT's AD

The forecast is to develop state-of-the-art infrastructures for the improvement of the standard of living of the community and to operate according to an Open Innovation approach, based not only on dialog with all internal resources, but also on the search for synergies with the external ecosystem of the Universities, Start up, Companies and research entities.

INWIT's innovation concerns the search for interventions and operations in the following areas:

- ▶ Monitoring activities
- ▶ Digitizing assets
- ▶ Construction of innovative infrastructures
- ▶ Open Innovation collaborations.
- ▶ Radio innovation

MONITORING

As part of the **monitoring activity**, the main activities carried out in 2021 concerned the following initiatives:

Elis Smart City Lab

In the Elis Smart City Lab laboratory based in Rome it was studied how INWIT infrastructures can support the development of Smart Cities, acting as a host for IoT sensors of different kinds and putting at service the hardware and software infrastructure for the fruition of the data they collect.

Motorway infrastructure monitoring

The proof of concept (PoC) is aimed at monitoring third-party infrastructure drones, using INWIT towers as a vehicle take-off and landing point and for data and image collection and sampling. This data is then shared via dashboards, aggregated, to the end customer.

Site access control with mechatronic systems

In order to improve the monitoring and control of access to its sites, in 2021 INWIT started a scouting activity to identify state-of-the-art solutions for access control on its infrastructures. This intervention represents the first step in a series of

activities that will lead to the engineering of a global management system for INWIT sites' physical security. The analysis focused on the different solutions for mechatronic padlocks and cylinders, key stores and related management platforms.

Particular attention has been paid to the **Keyless** solutions and the models that allow to guarantee and track access to the sites in an automated way, integrating and extending the current control systems in use.

Three alternative control modes have been identified for each type of device:

- 1 Keyless – APP access management – Bluetooth communication protocol between smartphone and device (characterized by a battery inside the device);
- 2 Keyless – APP access management – near field communication protocol between smartphone and device (characterized by no battery inside the device);
- 3 Mechatronic key.

Each solution allows you to enable or deny access to the individual person while ensuring activity tracking on the individual device.

For the two Keyless solutions, a trial was subsequently started, linked to the dual need to test the proposed solutions in the field and to allow the closure of the access tickets due to the malfunction of the existing mechatronic padlocks. The field trial will be accompanied, in 2022, by laboratory test sessions. The results will allow to outline the requirements for the final solution, to be acquired and implemented in the field over the next two years.

INNOVATIVE INFRASTRUCTURES

In the context of the development of its objectives of innovation and digitization of the country, INWIT also acts in a perspective of reducing environmental impacts. This is demonstrated by the two experimental projects, detailed below, concerning innovative infrastructure solutions.

The wooden tower

INWIT realized its first **wooden tower**, an innovative infrastructure consisting in laminated wood, material alternative to steel, to serve mobile telephony . 40 meters high, with 4 ballrooms to position antennas and radio bridges of the hosted managers, the tower is completely made of sustainable and circular material, in line with the objectives of the Sustainability Plan. The tower, located along the motorway A51 Tangenziale Est of Milan in the territory of the municipality of Brugherio (MB), is adjacent to the Park East of the quarries and guarantees the coverage of the cellular network of the area, also ensuring emergency telephone services, of particular importance for motorway traffic.

The choice of this type of material, which is well characterized from the point of view of sustainability, is linked to its quality of being recycled and reused as well as to its low carbon footprint.

With this intervention, INWIT pursues two functional objectives for these areas: The redevelopment of the Park territory as an ecological corridor, and the best possible environmental and landscape integration of the infrastructure. The wooden structured pole replaces the previous steel pole, which will be dismantled and recovered. The solution can represent an innovative and sustainable standard, both for future new projects and for the replacement of existing classical plants, of previous conception, as was the case for Brugherio



Fast-Site

During 2021, the first INWIT fast-site plant was built in the municipality of Beinasco (Turin). The pre-fabricated INWIT raw-land plant, serving mobile telephony operators, was built with an elevated infrastructure, anchored on a prefabricated platform, in reinforced concrete, engineered by means of elements that can be assembled together in layers, using threaded connecting bars. This solution combines the advantages linked to the possible use of standard multi-operator poles, made of steel, with the creation of a layered foundation, realized in the plant, with transportable modules and therefore of immediate installation and use.

The platform, built entirely in the factory, is immediately installed and used and is designed to gain clear advantages in reducing digging volumes, in the speed of installation (2 days instead of 4 weeks of the installed systems), in the possibility of reuse (disassembly and reassembly) both of the pile and of the prefabricated foundation itself.

The design phase is, in fact, fundamental to give the infrastructure a circular economy vision. The work must be designed to have limited impacts throughout the whole life cycle, and in particular in the end-of-life phase must be able to be disassembled so that each part of it could find another use.

RADIO INNOVATION

ORAN Alliance

In 2021, INWIT joined THE ORAN Alliance, the international consortium for the study and definition of the so-called Open ran architecture.

The consortium, in agreement with the 3GPP, aims to “open” the radio access network to the possibility of using, for the various functional blocks, elements made by different manufacturers - even using generic non-specialized hardware - capable of interacting with each other through a set of open standard interfaces and protocols. In this scenario, the access network is no longer built around monolithic apparatuses that manage all the functions of a radio base station, but using distinct functional elements, each of which takes over part of such functions. These elements, known in technical jargon as RU (Radio Unit), DU (distributed Unit) and CU (centralized Unit), are not physically located and, in general, communicate with each other through standard interfaces that guarantee interoperability between equipment and software produced by different suppliers, in an “open” way.

City Green Light Project

In early 2021, INWIT signed an agreement with a public lighting infrastructure management company, with the aim of experimenting with the implementation of small cell solutions on such infrastructures. The idea is to exploit the diffusion of these structures, on the urbanized areas, thus guaranteeing the capillarity necessary for the development of 5G networks.

The first phase of the project focused on solutions ‘engineering that ensured the integration of small multi-operator cells on public lighting poles. Therefore, two different solutions for the housing of the apparatuses (enclosures) have been engineered:

Small cell multi-operator

- ▶ belt solution (fixed to the pole);
- ▶ buried solution (by means of a well adjacent to the pole).

Both solutions provide good scalability in terms of the number of operators and frequency bands used.

Particular attention has been paid to the electrical insulation between the pole and radio devices, and a small extension has been engineered to be inserted between the pole and the lighting body to favor the exit of the radio cables, inserted inside the pole.

The trial phase involves covering a square of a city through the insertion of 3 different lighting points (using 2 belt solutions and an underground one). Among the objectives of the on-field trial is also the verification of the possibility of using existing infrastructures, such as cable conduits and power supplies, in order to considerably shorten the authorization and installation times.



ASSET DIGITIZATION

Already since 2018, INWIT started a substantial project with the aim of realizing a *digital twin* of the entire fleet of telecommunications infrastructures, in BIM (Building Information Modeling) format. BIM is a design methodology that links graphical information to detailed data for each component in the project. This data can then be extracted from the model and stored in a database. For this reason, the BIM model is considered a relational-graphical database, which has introduced at an international level, for some years, a radical change in the process of design, construction and management of infrastructures.

INWIT, in this scenario of technological acceleration, stands as a leading player, being the first TowerCo in Europe to have digitized the entire fleet of its infrastructures through BIM modeling. Through this methodology, INWIT is able to manage the design on the towers, having realized a single model for each of them in which all the interventions suffered by the infrastructure, during its entire life cycle, are historicized, through specific phases.

Athena

In 2021, the *Athena BIM Management platform* was built, capable of standardizing and accommodating all the models coming from the previous BIM standards and converting them according to the new INWIT modeling logic. This web app combines the sites' graphical presentation layer, the database storing the data from them, the library of detail's high-level components, representative of all the objects present on site, It is a workflow management section linked in double line with INWIT's operational system. The platform is constantly evolving to keep up with technology and design needs.

INWIT is still developing new features that will enable easier and more secure export and delivery to agencies by digitally signing tables extracted from the model and tracking activities through blockchains. Further developments will concern the possibility of carrying out static analyzes directly from the BIM model, to verify the load reserves of the infrastructures, and the interconnection with the other design and digitization of INWIT's platforms, such as *Éfesto*, with the sharing of geometries and data related to the radiant system, And *Hermes*, with the possibility of an automatic updating of the equipment areas.

Ermes

The *Ermes* system was created with the aim of identifying what is present in the rooms or areas - equipment owned by INWIT - and making such information easily usable for feasibility and design activities. Using the smartphone application, you can perform a cloud survey of points in your surroundings and use it as a basis for recognizing the components in your site. The objective is to return a faithful survey of the state of the places, a BIM model and an updated database of the present components. To date, the state of the developments of the web app allows INWIT, starting from the survey in the field, to:

Ermes

- ▶ to have an immersive experience of the equipment area with visualization of the environment in street view mode, measurable to centimeter in every part;
- ▶ select images for each component;
- ▶ view the mapping between the photo spheres and the BIM components of the model, relative to the site being analyzed.

This instrument thus becomes support to the operation both in terms of management and design of the available spaces and in terms of maintenance of the existing one.

Éfesto

To support the design activity, INWIT has created a useful tool for the study and evaluation of the electromagnetic emissions of radio operators hosted on the INWIT towers, in relation to Italian legislative limits on the protection of human health. In particular, the tool, starting from the geolocation data, from the host operators' radio configurations (antenna model, antenna power, electric tilt, etc.) and from the structural data relating to the antennas' height positioning and orientation, taken automatically from Athena, It allows to proceed both to the joint calculation of the electromagnetic field emissions of all the present systems (GSM, UMTS, LTE, 5G) and of all the emitted frequencies, and to the calculation of the individual contribution of each operator present, for each system and for each frequency used.

These calculation options allow to carry out in-depth analyzes of the residual electromagnetic space, where present, on each site and, in the case of saturation thereof, to evaluate possible modifications to the installations to be proposed to the hosts, in order to bring the whole site in its entirety into compliance with the legal limits.

These modifications can also be calculated, in complete autonomy, by the same tool, through an advanced algorithm that provides for the variations of some site's parameters (of the radio type and/or of the mechanical type) in automatic, offering the optimized solution downstream of a sequence of iterations of computational calculation.

Harmony

Harmony objective is to perform an efficient and effective management of the logistics of the equipment (energy stations, air conditioners, batteries, electrical panels, etc.) used by INWIT on its own sites.

This management accompanies the equipment throughout its useful life: From purchase, installation on sites, replacement for failure, repair and subsequent reuse, to disposal and scrapping according to the legal terms.

The tool consists of two modules:

- 1 A web module, in cloud, that allows the fast and guided creation of the requests from INWIT of the material to send on the sites scattered on the territory, the management of these requests toward the central warehouse, the tracking of shipments to the territorial warehouses of the installation companies and the recording of the installations and the disinstallations of the material, with the consequent updating "live" in every moment of the inventory of the INWIT's sites. This module also allows to track the movements toward the repair company and the subsequent reuse on the sites and, finally, to manage the scrap process of the parts that can no longer be reused since they cannot be repaired or obsolete
- 2 AN APP module for smartphone, consisting of an application that allows to carry out all operations in the field, with simplicity and immediacy, through the management of the QR codes that accompany every single piece that must be managed on the sites, from the moment it is received from the territorial warehouse, To the installation/uninstall phase, to the creation of the disassembly reports that allow the return of the material that is no longer useful in the INWIT's central warehouse. Each operation is traced in *Harmony* and each piece is followed by the tool throughout its life cycle through its unique serial number that is constantly tracked in the database, from purchase to scrap.

This system is an exceptional value element in optimizing the management of stocks, and materials used in all maintenance and development activities.

OPEN INNOVATION

In pursuing innovation as an element of growth and development, INWIT in line with the Sustainability Plan in the Innovation commitment area, believes it is essential to operate in an open innovation logic – by engaging in partnerships with start-ups, companies, universities and research entities that lead to the identification of more and more sustainable technological solutions, in terms of materials used for the realization of the sites, of landscape design and integration and of active use of the infrastructures, for purposes that go beyond that of neutral host for the telecommunications operators.

Partnership with the Turin Polytechnic

This includes the collaboration established with the Politecnico di Torino, center of excellence of Italian universities, which has led for the second consecutive year to the financing of two new innovation and research projects:

Two innovation and research projects

1 *Torre Green* is the project that has set itself the objective of studying and designing a tower layout for telecommunications, designed specifically for the use of renewable energies, with particular reference to solar energy, in order to supply, totally or partially, the devices housed in its own equipment room. The study was conducted on three rural INWIT sites with different infrastructure height and energy requirements, and covered three different infrastructure options:

- ▶ structure with triangular section;
- ▶ standard polygon pole INWIT;
- ▶ structure designed ad-hoc to house photovoltaic panels.

For each of these solutions, the optimal positioning of the panels and their number has been defined, in order to guarantee the maximum possible production of electrical energy. The possibility of adding a further photovoltaic surface, to be placed on shelters made inside the surface occupied by the site, has also been studied, in order to extend as far as possible the number of usable panels, to increase the production of electric energy and to guarantee a higher percentage of self-sufficiency.

2 Automatic BIM is the project that has led to the development of an application that, exploiting the logic of Augmented reality and/or Virtual reality, to date, allows, through the use of a physical target, to anchor and superimpose the virtual model to the real image framed with smartphone or tablet, to read the details of the components, selecting them, and highlighting non-conforming objects that can be modified later in the model. The application takes on a strong connotation of support to the operation, both of the professional studios that work on the sites, and of the maintenance staff. The project will continue also in 2022, with the aim of improving the features of the application and making it usable for the operational activities.

Partnership with the Polytechnic of Milan

For the second consecutive year, INWIT participates, as a partner, in the *5G & beyond Observatory*, research activities of the **Politecnico di Milano**, on the 5G evolution network standards and of the offer in the field of Edge Computing/Slicing, Open ran, mmWave, dedicated networks and on the state of diffusion of the relative devices (consumer and industrial). This project also enabled the participants to study the level of the 5G theme knowledge and the understanding of opportunities on the part of the players in the digital chain and of the Italian end-user companies, to study the new value chain for the development of a 5G project. With a focus on the actors involved and the skills required, analyzing also the 5G projects emerging in Italy in the different application fields, and understanding the impact of the different regulatory choices of the various countries through the analysis of the first commercial projects developed at international level.

Magic Spectrum

Participation as a *gold partner* in the *Magic Spectrum startup acceleration program of Digital Magics* stems from the need to know and participate in the startup market on IoT and 5G issues. In this sense, it gives the opportunity to know emerging realities that propose innovative digital solutions to be placed on the market and possibly to be integrated within the INWIT's IoT ecosystem. The project, which lasts six months, provides for a call to start-ups whose business is focused on these issues. In the first phase, 951 startups responded to the call, 442 of which were Italian, 689 on IoT issues and 252 on 5G issues. During 2022, meetings are planned with part of the selected start-ups to verify that the proposed projects are aligned with INWIT's needs. Next, the best start-ups will be selected, based on product/service maturity, reference market and investment criteria. In the final phase, the 3 most representative startups will be selected, which INWIT will help support through the program. This activity of scouting new emerging realities allows us to understand the evolution of the market without losing sight of the possibility of applying innovative solutions, supporting the growth of the most promising innovative realities.

Partnership with ENEL

In 2021, a three-year Memorandum of Understanding was signed with ENEL Italia, to promote sustainability, innovation and digital inclusiveness and accelerate our country's sustainable growth path. With the signature of this Memorandum of Understanding, INWIT intends to take a further step in the path of commitments made with its Sustainability Plan, through which it intends to further strengthen its role as enabler of digital development in support of telecommunications operators and lay the foundations for quality infrastructure's development, which is increasingly reliable, resilient and sustainable. Among the initiatives that can be implemented on the basis of the agreement, of particular importance are the development of photovoltaic systems combined with storage systems in the INWIT sites and energy efficiency projects. In this context, actions are also aimed at the circular economy, with the recovery and reuse of materials at the end of their lives, and sustainable mobility, through the electrification of the company's fleets. Further possible interventions also concern the use of efficient lighting solutions and the joint development of IoT services, which are already at the heart of INWIT's actions on the ground.

Advanced Energy Sustainability: POC PCM materials for TELCO - Business case

In 2021, INWIT produced a very innovative Proof of Concept in terms of energy efficiency.

The "Advanced Energy Sustainability" project aims to achieve significant economic savings and environmental benefits in the thermal management of shelters, using phase-change materials PCM - Phase Change Material (materials that, by changing state, absorb and release heat from the environment) - in the context of base transceiver stations, engineering their application and validating their sustainability.

Proof of Concept - the purpose of the first phase of experimentation was to control the peak of day temperature by accumulating heat in the Phase Change Material battery and then releasing it during night 's cool hours. In this way the air conditioning units may be gradually switched off.

The aim of the experiment was to verify the technical feasibility of a PCM thermal battery air conditioning system as an enhancement of free cooling, and then to collect measurements continuously, under different working conditions, even with predetermined configurations. This will capture useful data for the construction of a simulation model to be exported to different operating specifications (e.g. endogenous thermal loads and different climatic areas).

All the data collected during the experimentation have enabled the construction of the standard course for the air-conditioning system by means of a PCM

battery in the different phases of work: cooling of the shelter and regeneration of the battery. Among the data elaborated, most significant and useful for constructing and calibrating the simulation model, there are the heat exchange capacities both on the water/PCM exchanger and on the air/water one, with the same working conditions of the plant, with the most severe external climatic conditions and the internal thermal load. The proposed application involves among the expected benefits **a reduction in the consumption of electric energy** mainly due to the intervention of the chillers that guarantee the respect of the temperatures of the environments where the electronic apparatuses are installed.

The benefits can be summarized in:

- ▶ saving in consumption and consequently on CO₂ emissions;
- ▶ disposal of air-conditioning units;
- ▶ climate change resilience: The PCM material system is inherently more robust to extreme phenomena, even when compared to a fully outdoor configuration. The material properties and heat exchange yield do not degrade significantly as external temperatures rise. Net of the correct sizing of the batteries, the system is able to operate even in the presence of extreme events: - resilience to induced economic changes: lower structural consumption allows to be more resilient to possible increases in the cost of energy.

[SOCIAL AND RELATIONAL CAPITAL]



SOCIAL AND RELATIONAL CAPITAL

GRI 102-13

INWIT strongly believes that the country's digitization represents a development opportunity that fully integrates all dimensions of sustainability. That is why a challenging and compound program has been set up to create long-term value and contribute to the reduction of the digital divide and the cultural, social and economic development of the communities in which it operates.

Digitization means laying the groundwork for reducing inequality and for aiming for digital inclusion that can guarantee equal opportunities in the use of the network and in the development of a culture of innovation and creativity, by first countering new digital illiteracy and social and cultural discrimination, in line with the targets of the Sustainability Plan.

The INWIT's objectives is therefore to promote and develop collaborative projects to increase the coverage of smaller municipalities, rural areas and sites of high social and cultural value, aiming to overcome the digital divide geographically and to promote greater social and digital inclusiveness.

In this scenario, the role of INWIT is to support the implementation of the 5G network throughout the country at the service of mobile operators, proposing the more suitable infrastructure solutions also for the small realities that make up the Italian territory.

The development of 5G can make it possible taking a leap forward and accelerate the construction of smart cities, not only in large urban areas, but also in small villages. It allows the development and the widespread diffusion of a series of new technologies to positively impact on environmental protection, on the control of the territory and infrastructures and on risk management. Unlike previous generations, 5G, enables the development of an innovative ecosystem of territorially and continuously connected devices thanks to its speed, connection capability, and low latency. It can handle more and more data and provide millions of people with instant information about transportation, traffic, health services, safety alerts and community news.

To increase and inspire dialog with its stakeholders, INWIT has decided to join the following networks and associations:

- ▶ **Civita Association**, engaged in the search for an innovative dialog between the world of culture and the world of economy;
- ▶ **Valore D**, to support companies in promoting an inclusive culture and gender balance;
- ▶ **Optimists and Rationales Foundation**, deepens with scientific method the impact of economic, social and technological changes on institutions and society;
- ▶ **The United Nations Global Compact**, the largest strategic enterprise citizenship initiative in the world, which encourages companies around the world to create an economic, social and environmental framework to promote a healthy and sustainable world economy that guarantees everyone the opportunity to share its benefits;
- ▶ **Unindustria** – Union of Industrialists and Enterprises Rome, Frosinone, Latina, Rieti, Viterbo;
- ▶ **ASTEL** – Assotelecomunications, a trade association which, in the Confindustria system, represents the telecommunications sector;
- ▶ **Aspen Institute Italia**, an international organization committed to the most current problems and challenges of politics, economics, culture and society, with a particular focus on the Italian and international business community;
- ▶ **Canova Club**, association of managers, professionals and entrepreneurs that promotes friendship, culture and solidarity, with particular attention to the future of young people, to the third age and to the economic and cultural development of the country;
- ▶ **O-ran Alliance**, an international network of mobile network operators, research institutes and providers and universities operating in the Radio Access Network (RAN) sector.

RELATIONS WITH COMMUNITY AND TERRITORIES

GRI 413-1

INWIT pays attention to the development of the communities, demonstrating an active part in responding to the needs expressed by the territories in which it operates.

The possible impacts caused by the construction of the infrastructure can be attributed to two types:

- ▶ **Environmental:** Mainly linked to the integration of the installed infrastructure and facilities in the landscape, architecture and health, or to the use of innovative infrastructures with low impact (where possible);
- ▶ **Social:** Linked to the increase in accessibility to networks by the population involved, an issue particularly relevant of this phase of health emergency caused by the pandemic.

INWIT believes that, through collaboration and dialog with local communities, it will be possible to guarantee a constant and widespread digitization of the country. The commitment to activate projects to cover areas with a high social and cultural vocation (such as museums, universities, and hospitals), as described in the Sustainability Plan, was achieved in 2021.

In the social field, the 2021 network coverage projects concerned eight hospitals, seven of which were implemented and one in the process of being implemented. The commitment to bring wireless coverage to museums, universities and places of culture has also been maintained: INWIT has completed the projects to cover the offices of the Luiss University "Guido Carli" in Rome and the Campus hosting the Engineering Departments of the Federico II University of San Giovanni in Teduccio (Naples).

In 2021, INWIT realized the coverage of **the Railway Museum of Pietrarsa** (Na) and **the Congress Center La Nuvola Fuksas** in Rome for the meeting of **the G20**. The implementation of coverage projects in places of culture and aggregation has been renewed for the next three years of plan, together with the promotion of interventions planned to reduce the digital divide in our country. During 2021, INWIT was also the leading role of numerous initiatives involving communities and territories throughout the country.

To strengthen the oversight of activities that involve an interface with national and local institutions, with particular reference to critical situations present at the territorial level, the definition of the corporate position, intervention programs and priorities for action, in 2021 INWIT set up the Institutional Integration Committee by an organizational provision of the Chief Executive Officer.

The Committee, coordinated by the Director of External Relations, Communication and Sustainability, is composed of the representatives of various company functions and in relation to the issues covered, expects the involvement of further functions. The Committee provides periodically the CEO with an update on the found criticalities in the operational processes, the relative solutions identified and the progress of the defined action plan.



ADVOCACY INITIATIVES

Talk FOR 5G. It was a cycle of seven webinars, held during 2021, aimed at countering disinformation on the fifth generation mobile network, as well as encouraging discussion and debate on the subject, to explain the potential and benefits of the new technology.

The titles of the meetings are:

- ▶ The value of 5G between potential and services. 5G among fears, fake news and misinformation: "will there be a lack of information?"
- ▶ 5G and electromagnetism: Engage communities and fight fake news
- ▶ Healthcare: The future remote surgery
- ▶ The boot puts the turbo": Sharing Culture, museums, and villages
- ▶ Industry 4.0: The revolution is running with 5G
- ▶ Ready & Start! The smart city is connected
- ▶ University and research in the changing world.

The debates were enriched by the participation and contributions of more than 50 stakeholders, including members of Government, legislators, Mayors, local directors, university teachers, journalists, entrepreneurs and managers. The importance of taking action at local level through training and information operations was discussed during these meetings. The links between 5G innovation and various industries, such as healthcare, culture for museum and village revival, and 4.0 industry, were also discussed, with the benefits of faster, safer connections for companies. The need to create "smart" and connected cities, to which INWIT is already contributing, has also emerged with the development of new towers and dedicated micro-coverings.

The big opportunities **that 5G** will open in the near future were also discussed during the fourth edition of 5G Italy, the event promoted by the CNIT (National Interuniversity Consortium for Telecommunications), confirmed as the most important Italian event about 5G and its many areas of application. For the occasion representatives of the institutions and the scientific, industrial, economic and PA community have faced up to the current technological challenges. INWIT participated with a Chief Executive Officer's speech.

5G Tour. As a demonstration of INWIT's commitment and to strengthen its collaboration with the territories, in December 2021 Naples began a traveling narrative about 5G. The "TourFOR5G", whose contents are in continuity with the Talk FOR 5G, will involve 6 cities: After Naples, the stages of 2022 will be Rome, Florence, Genoa, Verona and Venice. With the contribution of personalities from the institutional, academic, and business world, the relevance of digital infrastructures, the potential of 5G and its concrete applications in the territory will be shown. The objective is to place the emphasis on the centrality and strategic importance of the individual territories to fully implement the objectives also contained in the NRR, in order to foster the digital transition in the country. Company's goal is to tell the story of 5G as a key factor to enable more sustainable ecosystems and to transform cities into smart cities, where cutting-edge services, innovation and attention to the needs of local communities will be the key assets of urban development.

With the first stop in Naples, INWIT restated with the CEO that to achieve full and complete deployment of 5G, it is necessary to implement widespread coverage of the ultrafast mobile network outdoors, with telecommunications towers, and indoors, that is, inside buildings, with micro-coverages.

Earth Technology Expo. Among the 2021 initiatives, INWIT took part in the Earth Technology Expo in Florence, a dedicated to technological innovations event in support of Italy's ecological and digital transition. The event was an opportunity for INWIT to tell the evolution of its telecommunications infrastructure toward increasingly smart towers, equipped with IoT sensors for land and climate monitoring, to support operators and to emphasize the importance of 5G in facilitating, through digital, the ecological transition to a long-term sustainable paradigm.

INITIATIVES ON THE TERRITORIES

M4 Milan. In March 2021, in Milan, an agreement was signed for the development of mobile connectivity within the new Linate - Forlanini section, among INWIT and M4 S.p.A., a licensee for the design, building, and management of the new line 4 of the Milan underground. The agreement with M4 represents a major step toward the future, consistent with the Industrial Plan 2021-2023, and it will help to put the first 5G-ready metro in Europe into action. The INWIT DAS plant will make optimal reception of the mobile signal of the various operators in the stations and tunnels of the M4, guaranteeing an excellent use of mobile

Hospitals. INWIT's commitment to providing hospitals with new technologies, which was undertaken last year, continued throughout 2021. The DAS installation was previously very supportive in the middle of the pandemic, giving to isolated patients and their families, and to the entire health-care staff, the opportunity to feel closer keeping in touch even in environments where a simple phone call was difficult. According to a recent report by the Digital Innovation in Healthcare Observatory of the School of Management of the Politecnico di Milano, the pandemic accelerated the diffusion of digital instruments in the health sector, also improving their knowledge and use.

Technological innovations are changing the public-health sector by enabling remote visits, ensuring better access to services and new types of care. Following the Covid-19 emergency, doctors have become aware of the benefits of digitization, particularly with regard to artificial intelligence in the health sector. This modernization needs fast tools and networks that can support paradigm shifts, and INWIT wants to be the leading role of this change. With this goal, INWIT has planned an investment program of approximately 600 million euros to building new towers and the development of internal and external micro-coverings with DAS and small-cells systems.

Since the beginning of the pandemic, 30 Italian hospitals have signed an agreement with INWIT to cover DAS microantennas, which means a user base of 9 million people for over 16,000 beds. In 20 of these hospitals the system has already been built, while in the other 10 the work is progressing. Thanks to INWIT infrastructures, healthcare facilities can enjoy a stable and fast connection to the main mobile networks at maximum performance, even in closed environments, where the signal is difficult to arrive under normal conditions.

In a speech at the event "E-Health, from current experiences to future opportunities", CEO Ferigo spoke about the role of the company in the new healthcare paradigm, renewing the commitment to build, in support of operators, a smart Italy where digital technology can truly represent an opportunity for a better and more inclusive country.

Increasingly interconnected, digitized, and innovative hospitals, and the development of so-called telemedicine, will play a key and essential role to help the work of health-care professionals to improve patients' quality of life. The last hospital structure, in chronological order, during the construction phase with indoor coverage, is San Giuseppe Moscati of Avellino, to witness INWIT's participation in the development of the new health paradigm. In the structure will be installed 200 micro antennas that will prepare it to be "5G Ready", so ready to receive the advantageous and innovative services that the fifth generation network will be able to offer.

G20 another extraordinary event, like the G20, held in Rome last October 2021, saw INWIT as an indirect protagonist. Indeed, the meeting of the world's top heads of state took place at the convention center La Nuvola Fuksas, where INWIT built an indoor coverage facility with DAS technology, by installing 40 microantennas connected to each other and powered by a signal that reaches the congress center via optical fiber. The new coverage makes the signal of all mobile operators stable and fast, allowing optimal use of all devices with wireless connection.

Museum of Pietrarsa. In 2021, INWIT also completed the work to make the National Railway Museum of Pietrarsa, of the Italian FS Foundation, ready for 5G technology. The coverage is realized with DAS technology, using micro-antennas with very low power of extremely small dimensions, connected to each other through the optical fiber, to allow the covering of the entire area of the museum pole and its Congress Center. This has made it possible, on the one hand, to take advantage of a more advanced and faster data reception system, and on the other hand to preserve the esthetics and the historical-cultural value of the most beautiful railway museum in the world, while at the same time making it an increasingly state-of-the-art site.

University. During 2021 INWIT completed the coverage of important universities such as the Luiss offices in Rome and the Engineering Departments of the Federico II University of San Giovanni in Tediuccio (Naples). These interventions enable indoor connectivity and equip the Athenaeans with infrastructures that enable optimal reception of mobile operators' signal, including 5G technology. Thanks to these interventions, in fact, the Internet connection in the enclosed spaces improves considerably. Classrooms, canteens and laboratories will enjoy a mobile network with excellent performance, without invasive interventions: The visual and electromagnetic impact of DAS, in fact, is absolutely negligible. The infrastructure is already 5G-ready, which will boost mobile connections' performance, enabling the development of innovative applications that will become an integral part of the way we study and do applied research in the future.

ELECTROMAGNETIC EMISSIONS MANAGEMENT

Telecommunications operators, who use INWIT infrastructures for services emitting electromagnetic waves, are responsible for the design and operation of their equipment in full compliance with the law.

INWIT, however, pays great attention to this issue by proactively monitoring its possible developments and always acting in compliance with the legislation.

With regard to the development of the 5G system and the aspects of electromagnetic compatibility, it's important to remember that the current emission power limits, which in Italy fall with a wide margin of safety within the limits of international standards, do not relate to specific technologies, they cover all emissions produced by a mobile radio site, regardless of the number of antennas and installed technologies.

The network architecture includes, among other things, "small cell" solutions to guarantee the appropriate level of bandwidth and speed in locations where the macro sites signal is insufficient due to their inherent technological nature, small cells (including 5G small cells) use lower radio powers than large base stations.

Like all telecommunications systems, 5G operates by electromagnetic waves propagating between a base transceiver station (the so-called "cellular repeater") and the mobile terminal (the cellular), and the frequency of the electromagnetic waves used by 5G are quite similar to those used by other cellular systems and by the Wi-Fi system (Dossier 2020 of ANCI and dossier^{6,7} 2020 of UNCEM and ANFoV). The effects of electromagnetic fields on humans have been studied for several decades, and the results of scientific research have shown that the only proven effect of high-frequency radiation typical of cellular systems is the heating of exposed tissues International Commission on Non-ionizing radiation Protection (ICNIRP), an organization officially recognized by the World Health Organization (WHO) and the International Labor Organization (ILO), have defined exposure limits to protect these impacts. Last March 2020 the ICNIRP published an update of the 1998 guidelines, which, a part some technical changes, essentially confirms what was in the 1998 guidelines, proving that a further 22 years of scientific research have not shown any effects of exposure to electromagnetic fields that would require a downward revision of the exposure limits.

Italy has applied the precautionary principle in order to provide greater protection against the long-term effects of electromagnetic fields on man, considerably lowering, compared with what Europe suggests in line with the ICNIRP, the maximum level at which it can be subjected in its housing at exposure.



⁶ ANCI dossier – 5G technology
⁷ UNCEM and ANFoV dossier – 5G technology

SUPPLY CHAIN

GRI 102-9 Supply Chain;
GRI 414-1 Evaluation of suppliers using social criteria
GRI 308-1 Evaluation of suppliers using environmental criteria

In 2021, INWIT updated its **procurement procedure** for goods and services, which defines how to purchase and its responsibilities, and which is based on the following principles:

Transparency of rules and decisions.

Competitions are promoted under condition of equal opportunities between suppliers who, for homogeneous products/services, have demonstrated - following a qualification process - to possess technical and organizational requirements deemed indispensable by INWIT. At the same time, the Supplier is required to declare that, at its own expense, there are no ongoing insolvency proceedings or injurious acts related to the Company and/or legal representatives/directors, serious administrative sanctions, including the accident prevention and occupational hygiene penalties issued by the relevant supervisory bodies.

Separation of roles.

Between the different operational and decision-making phases to ensure correct and transparent activities and to prevent conditions of individual benefit in the performance of the purchasing activities;

Fairness.

INWIT does not intend to derive competitive advantages from suppliers based on non-responsible behavior and requires its employees that relationships with suppliers are governed only by objective criteria by committing themselves to promoting the principles of legality, transparency, fairness and loyalty. Each employee must keep his or her personal interests separate from those of INWIT;

Tracking of purchase documents.

For each contracted activity, all documents are kept in respect of the respective purchasing functions to support the correctness of the transactions and the choices made. Similarly, the documents proving the outcome of the Control activities and verification of the products/services delivered/supplied/installed by the suppliers are available from the competent company functions, the results of which are conditional for payments.

INWIT uses the purchase of goods and services that can be attributed in three macro categories:

- 1 Providers of services for the realization and maintenance of base transceiver stations;
- 2 Professional service providers;
- 3 Suppliers of technological materials and equipment.

The first type of suppliers consists of medium-large construction companies that typically cover geographical regions of the Italian territory. The second type of suppliers is represented by professional studies with qualified personnel registered in specific register or by companies specialized in the integration of Software systems. The third type of suppliers consisted of companies that produce equipment used for INWIT infrastructures such as air conditioners, electrical panels, radio signal distribution apparatuses.

During 2021, **162 new suppliers** were added to the INWIT supply chain. The total expenditure for 2021 was more than 114 million euros for a total of **420 suppliers**. It's distributed as follows:

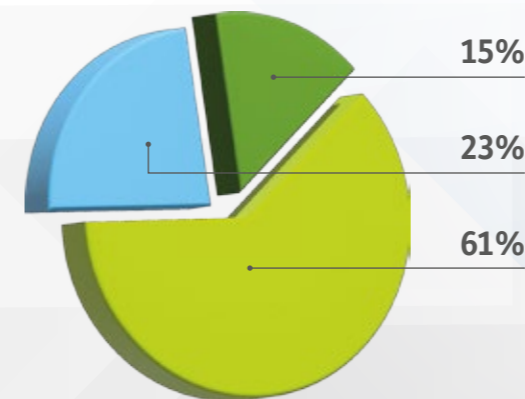
- 37% manufacturing and maintenance services
- 30% professional services
- 34% suppliers of technological materials and equipment

The share of local supply was also significant in 2021, increasing from 90% to 99% of suppliers based in Italy (the remaining 1% abroad).

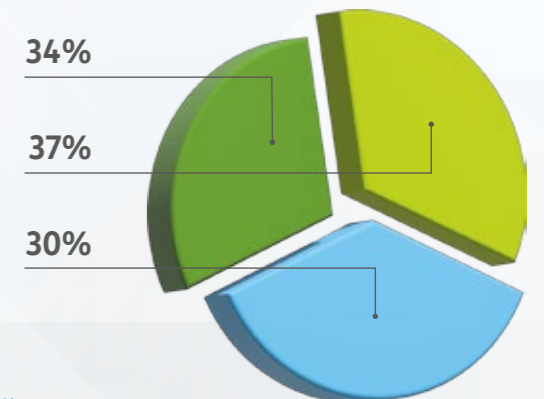
Subcontracting contracts concluded in 2021 also increased from 140 sub-suppliers in 2020 to 199 sub-suppliers in 2021.

Below is the detail of monetary value expenditure compared to the three macro categories of goods and services.

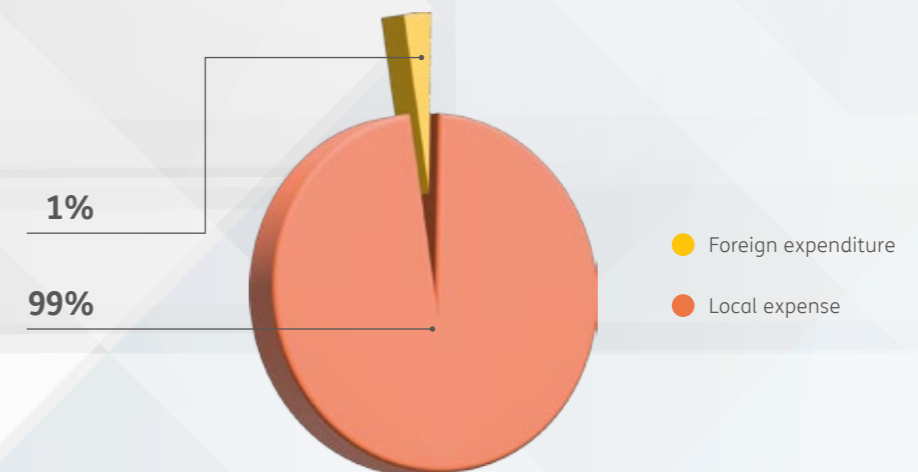
Supplier expenditure at 31.12.2020



Supplier expenditure at 31.12.2021



Geographical distribution of expenditure 2021



SUSTAINABLE SUPPLY CHAIN

In line with the commitments of the Sustainability Plan and with the goal of extending the sustainability principles to the entire supply chain, in 2021 INWIT included, in all supply contracts, specific clauses related to ESG risks, also listed in the Terms & Conditions standards of purchase orders.

Within the procedure for the purchase of goods and services, INWIT has declined sustainability criteria, to increase the level of sustainability and the circularity of its supplies. The allocation of these criteria is a premium element in the tender award phase.

Supplier reward criteria:

- ▶ Health and Safety Management Systems (ISO 45001);
- ▶ Low environmental footprint (asking for documentary evidence such as an LCA study of its own processes or a carbon footprint);
- ▶ Environmental Management Systems (EMAS, ISO 14001) and Energy Management Systems (ISO 50001);
- ▶ Sustainability reports or non-financial statements;
- ▶ Energy supply contract based on renewable sources, e.g. asking for the guarantees of origin issued by the Energy Services Manager;
- ▶ Geographical proximity to the place of the service and with short supply chain.

Products reward criteria:

- ▶ Product as a service, preferring the purchase of a service instead of a product (e.g. printers and company fleets);
- ▶ products with an environmental declaration or certification according to the existing Type I (e.g. EU Ecolabel) and Type III (e.g. EPD) schemes;
- ▶ reusable products, avoiding the purchase of disposable products, such as disposable plastic in offices.

With the Supplier Qualification Management procedure, the company wanted to strengthen the verification of the legal, economic financial, technical organizational and sustainability requirements of its suppliers, as well as the verification of the quality, safety and environmental compliance requirements of the purchased goods. It is expected that all suppliers with a turnover volumes of more than 250.000 euros should complete an ESG questionnaire, which was foreseen in the Sustainability Plan and which will be submitted during 2022.

Among the selection requirements in the questionnaire, the request for socio/environmental certifications is expected, among others. In addition, all suppliers are required to sign the INWIT Pact of Ethics and Integrity, so they are committed to respect for the environment, the protection of human rights and labor standards and the fight against corruption. In 2021 all INWIT suppliers signed the Pact. In accordance with these values, its suppliers are required to promote compliance with these principles toward subcontractors.

The correctness and transparency of the pre-contractual and contractual relations that INWIT maintains with its suppliers are ensured, not only by a system of rules and procedures, but also by a network of controls carried out within the whole process of qualification and purchase. The registration in the Supplier Register is always verified

by means of objective and documentary findings and, for certain product categories, also by means of technical-organizational audits at the suppliers' offices. The formalization of relations with suppliers can proceed only after the technical-economic checks, the negotiation with the counterparty and the checks involving to the Related Parties procedure and the Golden Power regulation.

INWIT has a stand-alone **supplier management platform for monitoring the process of evaluation and selection** of suppliers. It is a system, through which the application for the insertion of a new supplier is completed in order to start the qualification process and/or associations to new qualification objects, as well as to verify the qualification status of a supplier.

Lastly, during 2021, INWIT has implemented a **Vendor Rating policy** applied tentatively on two strategic supply sectors - the realization and design of the base transceiver stations - to indicate the guidelines for monitoring and evaluating, through the Vendor Rating Index, the performances carried out by the qualified suppliers. These guidelines allow, among other things, to improve the quality of services, supplies, works, to monitor and improve the supply chain, and to promote long-term value creation. The Vendor Rating allows an objective monitoring of the performance of the suppliers evaluated and provides for the suspension from the register in case of insufficient evaluation. The evaluation of the quality and reliability of the suppliers takes place thanks to the verification of strict requirements that lead to the selection of the interlocutors endowed with high standards of professionalism and quality.

The supplier is subject to periodic evaluation through:

- ▶ inspection activities aimed at verifying and assessing compliance with technical, environmental and safety requirements;
- ▶ analysis and monitoring of data available to the system.

To conduct and guarantee an impartial, systematic and traceable evaluation, INWIT uses evaluation questionnaires based on factors of evaluation of the performance of suppliers, applied in a differentiated way between the realization of a supply and the provision of a service.

All evaluation factors aim to identify the main areas of criticality of the supplier (if present) and to trigger a continuous improvement path, suitable for the efficiency of the supply chain. Finally, the areas of evaluation contribute, through the weighted average, to the system determination of the Vendor Rating Index, which identifies, in a quantitative way, the evaluation of the performances carried out by the suppliers.

Among the suppliers analyzed in 2021, INWIT identified:

- ▶ 3 critical suppliers - those for which there is a difficulty in replacing, or with which high supply volumes are associated.
- ▶ 2 suppliers with a dependency ratio (turnover ratio to INWIT on the Global) greater than 80%.

INWIT also considers "high sustainability risk" vendors that can potentially generate a significant negative impact on the organization within ESG.

The level of exposure to risk depends on the product category of interest. For the identification of the suppliers with high sustainability risk, therefore, it is necessary to classify by category of goods, starting from the macro categories described above, suppliers of services for realization and maintenance of radio base stations, suppliers of professional services, suppliers of materials and technological apparatuses.

For each category of supplier included in the identified list, the management of the problems related to ESG issues is evaluated, for which they are “high sustainability risk”, Suppliers who have inadequate management of ESG issues from the visa point of regulatory compliance in the areas of Health and Safety, Environment and contributory corrosiveness.

Sustainability risk is considered mitigated for suppliers with at least one of the following certifications/documents:

- A** Environmental and social risk:
 - ▶ ISO 14001 or EMAS;
 - ▶ ISO 45001;
 - ▶ ENVIRONMENTAL REPORT OR SUSTAINABILITY REPORT;
 - ▶ COP (Communication on progress – Global Compact).

- B** Risk of Governance and Corruption:
 - ▶ Code of Ethics and Conduct;
 - ▶ 231 Organizational Model;
 - ▶ Formalized Internal control system ex Leg. 262/2005;
 - ▶ Internal anticorruption policy or other public documentation
 - ▶ ISO37001.

In addition, the higher the strategic importance of the supplier (critical supplier for dependence, expense and/or geographic location), the higher the level of risk. In this regard, the requirements for the identification and monitoring of strategic suppliers have been established.



[HUMAN CAPITAL]



HUMAN RESOURCES

The involvement, well-being and development of people are one of the pillars of INWIT's sustainability strategy, aware that a business culture focused on including and enhancing diversity will bring change to all stakeholders, generating a positive impact both in the company and on the society in which it operates and contributing to the medium and long term value creation.

INFORMATION ABOUT EMPLOYEES AND WORKERS

GRI 102-8; 102-38; 405-1; 405-2;

As of 31 December 2021, INWIT has 246 employees, an increase of 19,42% compared to the previous year, due to the company's recruitment policy, in contrast to the period of uncertainty due to the pandemic that is still characterizing the world's economies.



With these new entries, in 2021, employees with full-time contracts grew by 20% compared to the year 2020, and 99% of the company's population have a permanent contract. 74 employees are based in the Northern of Italy, 129 in the Central and Sardinia and 43 in the Southern of Italy and Sicily. 51% of the total company population are over 50 years old, 45%, are those between 30-50 years old and the remaining 4% are under 30.

The following tables show the total number of employees by geography, gender, and permanent and temporary contract, and by gender and part-time or full-time contract.

Table 3 Information on employees and other workers (GRI 102-8)

Total number of employees by contract type (permanent and temporary) by geographical area and gender							
As of 31.12.2020							
	North		Center and Sardinia		South and Sicily		Total
	Men	Donne	Uomini	Donne	Uomini	Donne	
Permanent	41	20	62	44	30	8	205
Temporary	0	0	1	0	0	0	1
Totale	61		107		38		206

Total number of employees by contract type (permanent and temporary) by geographical area and gender							
As of 31.12.2021							
	North		Centro e Sardegna		Sud e Sicilia		Total
	Men	Donne	Uomini	Donne	Uomini	Donne	
Permanent	Women	26	72	54	32	11	243
Temporary	Men	0	1	0	0	0	3
Total	74		129		43		246

Total number of employees by gender part-time and full-time							
Part-time/Full-time	As of 31 December 2020			As of 31 December 2021			Delta 2021/2020
	Uomini	Donne	Totale	Uomini	Donne	Totale	
Full-time	134	71	205	154	91	245	19,5%
Part-time	0	1	1	0	1	1	0%
Total	134	72	206	154	92	246	19,4%

In 2021, the ratio of the highest total full-time salary within the organization to the median for all employees is 15,6, down more than 5% from the previous year, as shown in the table below.

Table 4 Annual total compensation ratio (GRI 102-38)

	2020	2021	Delta 2021/2020
Annual total compensation ratio	16,52	15,65	-5,13

Overall, the company's population in 2021 consisted of 8% of executives, 19% of managers and 73% of employees. The following tables show details of employee percentages by professional category and gender and by professional category and age group for the 2021.

Table 5 Detail of employees by profile, age group and gender (GRI 405-1)

Percentage of employees by profile and gender				Percentage of employees by profile and age group				
As of 31 December 2021				As of 31 December 2021				
N. people	Men	Women	Total	N. people	<30 years old	30-50 years old	>50 years old	Total
Executives	80%	20%	8%	Executives	-	20%	80%	100%
Managers	68%	32%	19%	Managers	-	34%	66%	100%
Employees	59%	41%	73%	Employees	5%	51%	44%	100%
Total	63%	37%	100%	Total	4%	45%	51%	100%

Compared to 2020, women's proportion has increased, both in the executive role, from 17% to 20%, and in the manager role, from 27% to 32%. The number of executives between 30 and 50 years old has also increased to 20% in 2021, compared to 11% of 2020. For more detailed information about employee percentages by profile, age group and gender between 2020 and 2021 please refer to the attachments.

In 2021, 78% of men and 22% of women had a responsible role, while the last 2020 was 79% and 21% respectively. The table below shows the number of women and men who are responsible in 2020 and 2021.

Table 6 Number of people with a role of responsibility

Responsibility role				
N. people	2020		2021	
Men	26	79%	29	78%
Women	7	21%	8	22%
Total	33		37	

3% of employees are in the protected categories. 61% of INWIT employees have a master's degree, 39% have an high school graduation.

For further information on the relationship between the basic salary and overall female and male salary, please refer to the tables in the attachments.

The Recruiting procedure

INWIT is characterized by strong competitive pressure and of deep technological transformation environment, in which implement actions for the evolution of professional roles, through the inclusion of new skills and the reorganization of internal ones.

INWIT is defining **an internal recruitment procedure** which will ensure, on the one hand, the procurement of external competence (External Recruiting) and, on the other hand, the enhancement and remix of internal competence (Internal Recruiting).

The recruiting process is designed to develop the potential and value of people diversity without any distinction of sex, religion, ethnicity, sexual orientation, gender identity, of opinion, of different abilities and of personal and social condition. Diversity turns out to be a fundamental richness of corporate competencies and, not least, a resource to foster and accelerate processes of innovation and cultural change.

As part of the recruiting and selection process, and to confirm the attention paid to the respect for diversity, it is planned to:

Recruiting procedure:

- ▶ ensure that the choices are consistent with the objectives of inclusion and diversity and that they pursue a general balance of the female presence in the different organizational environment;
- ▶ promote orientation and promotion events for female employment opportunities and career paths;
- ▶ provide the evaluation instruments' accessibility to all candidates, by adapting the fixed and mobile work station, according to their specific needs;
- ▶ carry out the activities with express prohibition of any form of investigation of candidates, except for due diligence activities in relation to aspects of reputation and conflict of interest.

In 2021, a procedure was initiated to provide the framework for the management of **the Recruiting, Selection and Hiring of the INWIT executive and non-executive personnel**, and to ensure the governance of the entire process, monitoring its efficiency and effectiveness. This process is divided in some stages as detailed below.

Recruiting process (phases):

- 1 Planning.
- 2 External Recruiting and selection of job roles and non-executive managers.
- 3 External Recruiting and Selection for Management Roles (Executives).
- 4 External Recruiting -Assumption.
- 5 Internal Recruiting and selection with development of internal professionalism.

Process activities and tools are diversified according to the market in which the candidates are found, the target audience and the profiles to be searched.

At the same time, INWIT, in partnership with the LUISS Guido Carli University, has awarded scholarships for students enrolled in STEM degree courses, with the aim of mitigating the mismatch between the demand for digital professionalism, now purely male, and the provision of human capital on the labor market.

The company is planning to introduce strict inclusion KPIs into selections operated by external recruiting agencies. In 2021, women included in the selection process were 40,2%.

RECRUITMENT AND TERMINATION

GRI 401-1

The recruitment rate is 21% in 2021: INWIT has included a total of 51 people, of which 82% are between 30 and 50 years old, 10% are over 50 years old and the remaining 8% are under 30. 47% of the people who have entered the company in 2021 are women: these new entries lead the proportion of women in the company to exceed 37% of the total number of employees, in line with the achievement of the target of Sustainability Plan to cover 40% of the selection.

A total of 11 terminations were recorded in 2021, of which 45% were employees between 30 and 50 years old, 36% were over 50 years old, and 18% were under 30. For more detailed information of the recruitment rate and turnover please refer to the attachment.

OUR PEOPLE, THEIR WELL-BEING, DEVELOPMENT AND VALORIZATION

DIVERSITY & INCLUSION

GRI 406-1

In continuity with 2020 and after the D&I Team institution, last July 2021, INWIT achieved the Sustainability Plan's target publishing **the Diversity & inclusion Policy for the first time in its history**. The Policy aims to disseminate the values of diversity and inclusion within the organization, promoting and encouraging initiatives that support the respect of individual' rights and dignity. The Policy outlined fundamental principles that must inspire business operations, direct people behaviors to overcoming all types of discrimination, and guarantee working conditions that respect the individual dignity, and INWIT people's psychophysical, moral and cultural integrity.

Within the D&I initiatives framework INWIT has joined the intercompany event **4 Weeks 4 inclusion**, with an event entitled *"I don't want to be a princess, I wanna be a CEO"* dealing with the themes of Gender Gap and equal opportunities promoted in Companies in order to ensure a greater female presence in the recruitment and preselection phase, and to guarantee equal access conditions in the internal career development paths.

The role of the D&I Team is central in promoting new initiatives in support of an increasingly inclusive culture and promoting inclusive and involved corporate well-being.

INWIT's commitment continues incessantly, in line with the Sustainability Plan's guidelines for the people area, that consist in increasing corporate identity and promoting awareness on diversity & inclusion topic. For the third consecutive year, INWIT is reconfirmed in the **Refinitiv Diversity & inclusion Top 100 Index**, and this year in second position among Italian companies, 31° globally and second in the world in the Telecommunications sector.

In 2021, many training initiatives have promoted inclusive language's dissemination and leadership's development to make inclusion the cultural paradigm of reference, also including the responsible management of the working Team, to increase sensitivity and awareness about the diversity's value.

INWIT took an active part in the D&I Observatory of Italy's Global Compact Network, established in 2021. It was included in the company's guidelines on diversity & inclusion as a best case, with 16 other multi-sector companies. The paper gathers not only best practices and reflections, but also challenges and criticalities that emerged around the working table, with the desire of guiding companies to overcome unconscious prejudices and stereotypes, going beyond compliance and the principle of non-discrimination. INWIT has contributed to these guidelines, with the purpose of inspiring as many companies as possible to recognize and enhance human resources in their diversity in and out of the company, respecting justice and inclusion principles, in order to contribute to a positive effect on economy and society.

Freedom of expression

The Diversity & Inclusion Policy aims to make the workplace an inclusive, welcoming and plural environment, where freedom of expression is always guaranteed, and where everyone can feel free to express their nature and authenticity without any form of discomfort.

Non compliance with these principles may result in the control bodies' analysis about that behavior and may trigger sanctions to protect those who have been offended or affected by such behavior.

In 2021, there were no recognized incidents of discrimination within the Company.

Employee enhancement and development

To improve corporate well-being and to identify areas for improvement, in 2021 INWIT created the first engagement Survey "near you/hear you". The survey was addressed to all employees analyzing the whole corporate environment. The survey investigated the following dimensions:

- ▶ Enable performance
- ▶ Agility and innovation
- ▶ Direct manager's effectiveness
- ▶ Top Management 's effectiveness
- ▶ Employee experiences
- ▶ Confidence in the future
- ▶ Strategic focus

The participation rate reached 80% of total membership, with a 79% of engagement Index. During 2022, ad hoc initiatives will be proposed to further improve the business climate and the employees' well-being.

INWIT uses an integrated human development system to assess and enhance both performance and potential. Performance Management System keeps people's skills and behaviors aligned with the evolution of the company in supporting the delivery of the strategic plan. Performance Management therefore follows the dual purpose of developing and strengthening the corporate identity. The evaluation system operates on an annual basis and it is focused both on achieving the objectives and on the skills put in place to achieve them. The process has a global approach across the entire business population, so all employees are required to perform bottom-up, top-down, and cross-cutting assessments.

Within the integrated development system, periodic potential mappings are provided through the Assessment Center tool, that have the purpose of directing specific development and enhancement of professional/managerial skills, and to support the company in the Job rotation's plan and replacement tables' design.

Figure 9 INWIT Skills Model



As foreseen in the Sustainability Plan, with the aim of developing and implementing the system of delegation and responsibility in the field of sustainability, targets of the plan were included in the MBO system of the Managing Director and of all the management incentives. For CEO's MBO 2021 the sustainability target is 15% of the total.

Corporate welfare GRI 401-2;

INWIT provides a rich program of welfare initiatives aimed at employees, in line with its values and objectives: through these initiatives INWIT expresses respect and attention for people, actively contributing to making some of the expenses that are used in family budgets more economically sustainable.

The main initiatives offered by INWIT during 2021 were:

- ▶ partial repayment of the monthly fee for nursery school or kindergarten, and of university fees for employees' children;
- ▶ access to corporate loans;
- ▶ work organization and leaves' flexibility (e.g. possibility to take up to 24 hours of leave per year, in the event that the full entitlement to leave contractually provided has been exhausted and for proven and serious personal reasons; possibility to give up to 15 hours and 16 minutes of religious holiday leaves or two days of holidays to another employee free of charge);
- ▶ summer initiatives for 6 to 18 years old children of the employees, about specific issues such as languages knowledge and socialization;
- ▶ agreements for facilities for employees on domestic households;
- ▶ agreement on insurance policies reserved for employees and their families;
- ▶ participation in commercial television offers;
- ▶ smart working's confirmation and extension;

ASSILT

Association for supplementary health care for workers of companies of the TIM Group, also extended to INWIT, provides members and beneficiaries with services in addition to those provided by the National Health Service, including, in collaboration with public health structures, carrying out research, surveys and preventive health interventions for groups and individuals, as well as the promotion of health education initiatives.

ASSIDA

Association for Integrative Health Care Business leaders, provides managers with reimbursement for supplementary health benefits compared to those provided by the National Health Service.

TELEMACO

Is the supplementary National Pension Fund for workers of companies in the telecommunications sector. The aim is to ensure that associated workers maintain their standard of living even at retirement time, by creating supplementary pension to the public pension. It is intended for workers, employees and managers of companies applying the national telecommunications contract, for permanent, apprenticeship and insertion workers, and for those taxable by workers who are members of the Fund.

CRALT

Corporate Leisure Club for the employees of the Companies of the TIM Group, also extended to INWIT, organizes for its members, employees, pensioners and family members, initiatives of a tourist, sports, cultural and recreational nature. The craft also allows members and their family members to acquire goods and services at prices/rates of particular convenience, always benefiting from the payment of expenses. In this respect, the Convention and its contribution to the purchase of school and university texts for the children of members are of particular importance, as a valuable support for the spending capacity of households.

Even in 2021 in the face of the state of emergency, conventions with health facilities were confirmed to provide health services to workers and their families (flu vaccines, antigenic and molecular buffers, serological tests...).

Compensation

The remuneration policy aims to support the business objectives' achievement, promote the shareholders' value creation and company performance's incessant improvement. INWIT has provided a remuneration structure aligned with market best practices, strengthening the engagement of staff and recognizing the criticality of the role played and the professional contribution.

After the 2021 Shareholders' Meeting, INWIT launched a structured process to collect and deepen the remuneration issues that interest shareholders and *proxy advisors*.

At management level, the short-term variable incentive system reserved for all managers of formalized organizational structures was determined on the basis on economic/financial and quantitative objectives represented in the industrial plan. During 2021, the 2nd cycle of the LTI 2020-2024 plan approved in 2020 was launched, reserved for the CEO, Key Managers and other managers with critical roles for the Company.

To support the achievement of the main operational and business objectives – primarily represented by revenue development and cost optimization – canvass awards have been implemented for the people of the business and operations processes teams.

Performance bonus

In 2021, a three-year agreement was signed (2021-2023) for the first “post-merger” INWIT Performance bonus. The agreement foresees a 20% increase in premium values over three years compared to the previous “pre-merger” performance bonus and the alignment of performance metrics with the Company’s main economic and financial objectives.

Widespread broad-based share ownership plan

Last year, INWIT launched, for the first time, a widespread shareholder plan aimed at all employees, with the aim of promoting the “active” participation of people in the Company’s results and investing in the sense of identity. This opportunity, which 98% of INWIT’s people joined, consisted of a first free allocation of 100 shares for each employee, and a bid to purchase shares at a discount of 10% of the market value, within the maximum limit of 200 shares per employee. Employees who have retained their free shares and purchased shares for one year, subject to the maintenance of their employee status, will be recognized free of charge shares in the ratio of 1 bonus share per 3 shares held. About 80% of people chose to invest further in INWIT, taking advantage of the discounted purchase, and 85% of people who invested purchased the maximum number of available stocks. In December 2021, the above-mentioned bonus shares were awarded to eligible people.

TRAINING

GRI 404-1; 404-3, 205-2

INWIT invests in quality training with the aim of supporting knowledge, the use of new technologies and the professional growth of people. In December 2020, the National Agency for Active Labor Policies (ANPAL) approved the training program of INWIT ‘enabling Digital future: Training to perform’, within the framework of the New skills Fund, to promote the skills and development of human capital. The project will strengthen the assets of expertise and enable organizational, digital and technological transformations in line with the growth strategy of society. The projects will focus on the spread of a “agile” culture and further “digital skills”. The program proposes several thematic pathways aimed at the introduction of new organizational models that look at increasingly smart work, the inclusion and diversity and the environmental sustainability of production, work processes and real estate assets.

The project focused on the following 4 macro topics:

- ▶ smart organization and individual development
- ▶ digital transformation
- ▶ upskilling and key professionalism
- ▶ sustainability and the environment.

Thanks to this project, during 2021 the training hours picked up again, after a 2020 impacted by the healthcare emergency and the merger by incorporation with Vodafone Towers. Training hours in 2021 were more than 15.700 in total, significantly increasing compared to the 4.000 hours of the previous year. In detail, 11.580 of training hours are given with ANPAL, 2.846 of training hours have been about Workplace Health and Safety, 1.260 hours in risk & Compliance, and the remaining 27 hours have been about the induction conducted in June 2021 that involved INWIT executives⁸.

The details of the hours by type of training are given below.

Table 7 Details of the hours by type of training

Hours per type of training	
COURSE	HOURS
ANPAL Training	11.580
HSE Training	2.846
Risk & Compliance Training	
▶ of which Antitrust and Golden Power	266
▶ of which Compliance & Business Ethics	534
▶ of which Privacy and Data Protection	460
Induction Corporate Governance (for the first line of management)	27
Total	15.713

In addition to employees training, the 100% of the 13 members of the Board received training on anti-corruption policies and procedures. The same training has also been provided to the company population and more details are shown in the following table.

Table 8 Details of training on anti-corruption policies and procedures (GRI 205-2)

Total number and percentage of employees who have received anti-corruption training, by job category and gender			
N. people	2021		
	Men	Women	Total
Executives who have received training	6	3	9
Total Executives	16	4	20
% participation	38%	75%	45%
Managers who have received training	20	8	28
Total Managers	32	15	47
% participation	63%	53%	60%
Employees who have received training	92	57	149
Total employees	106	73	179
% participation	87%	78%	83%

⁸ More details of the training courses for 2021 are in the section on Workplace Health and Safety.

The following table also shows the number of training hours divided by gender and professional category. In 2021, on average for each employee, 64 hours of training were provided.

Table 9 Average annual training hours by gender and category (GRI 404-1)

Hours of Training												
Hours	2020						2021					
	Hours men	Average hours/ men	Hours Women	Average hours/ women	Total hours	Average total hours	Hours men	Average hours/ men	Hours Women	Average hours/ women	Total hours	Average total hours
Executives	310	21	89	30	399	22	687	43	163	41	851	36
Managers	711	24	251	23	962	23	2.297	72	651	43	2.947	63
Employees	1.712	19	936	16	2.648	18	8.052	76	3.864	53	11.916	67
Total	2.733	20	1.276	27	4.009	19	11.036	72	4.677	51	15.713	64

In addition, there are also professional upgrade pathways aimed at strengthening some key skills with respect to the evolutionary trends of the market and business that range from the acquisition of methodologies for optimization processes and data analysis, to the development of the ability to study and develop Cyber Security, up to include the promotion of IoT services and the use of advanced technologies.

100% of employees are evaluated periodically for performance and career development, employees who joined less than 6 months ago and those on maternity and paternity leave don't have included. In 2021, 231 employees were evaluated. For further information, please refer to the tables in the Attachments.

INDUSTRIAL RELATIONS

GRI 102-41;

The ongoing dialog with trade union organizations continued throughout 2021, leading to the signing of a new agreement between INWIT and the national, territorial OO.SS and the RSU. Among the agreement main issues there are the new Performance bonus, a plan to optimize the company's offices and the establishment of a Workers' Participation Committee.

For the Performance bonus, a three-year agreement (2021-2023) was signed, that foresees an increase in current values of more than 20% in three years and the alignment of performance metrics with the Company's main economic and financial objectives. In addition to the bonus, an additional welfare share is expected to be paid for welfare goods and services in the first year.

After the end of the emergency due to Covid 19, the locations optimization Plan foresees the remote employment testing with return for 8 days a month to the company offices, without prejudice to company needs related to the work activity. In line with the ongoing digital transformation, the agreement provides for greater employment

flexibility, focusing respectively on employee accountability and autonomy and on work for objectives oriented toward the achievement of results.

Finally, the establishment of the Joint Committee, in accordance with an "advanced participatory" model, allows workers to be directly and actively involved in business process transformation plans. More specifically, it is a bilateral body that provides for the establishment of inter-functional, inter-hierarchical and inter-professional groups, with proactive and collaborative functions, to improve the business operating model and increasing productivity.

In INWIT, all employees are covered by collective bargaining agreements. 12% are members of the trade union, with which compare each others 2 or 3 times a year.

WORKPLACE HEALTH AND SAFETY

HEALTH AND SAFETY OF EMPLOYEES

GRI 403-4; 403-5; 403-6; 403-7

For INWIT innovation, sustainability and people care are key values for success. In the face of the Covid 19 emergency, also for 2021, INWIT intervened with specific actions to protect employees. Among these interventions is a wide-scale use of smart working, the continuous sanitization of working environments, the restructuring of the latter to ensure social distancing, the use of an app to regulate the presence in the workplace, and the provision of specific training on safety protocols to all employees.

Smart working

Aware of the difficulties that the sudden change of working habits and environment was causing to employees, INWIT considered it necessary to equip all its people with the necessary means to carry out, in the best possible conditions, work activities even remotely. Even in 2021 employees already with a laptop have been extended the possibility to request the free delivery of equipment to work in a healthy way, such as an ergonomic chair, headphones and monitor.

Virus prevention and workplace sanitation

During 2021, office in Piazza Trento in Rome, was made available to employees on a voluntary basis and with the permission of the manager and the HR business partner. To guarantee a controlled cluster, a health care facility was set up within the building, which every Monday carried out antigenic buffers to the staff who wanted to work on site during the week. In addition, in the first half of the year, for appropriate prophylaxis of working surfaces, three times a week a laboratory technician carried out buffers on the greatest contact areas within the office (lift buttons, handrails, push-buttons, vending machines and break-room tables, tables of meeting rooms and open spaces, bathroom door handles etc.). In the early months of the year, INWIT launched an internal vaccination campaign aimed at its employees, which subsequently suspended, thanks to the excellent results in public facilities.

⁹ The average of the hours is the result of the relationship between the training hours for each category and gender with the number of employees belonging to the relevant category and gender.

It's the growing base of vaccinated workers and the subsequent introduction of the green pass that a review of rapid buffer strategies has enabled by favoring better technologies on the market for monitoring environments. the adoption of sensors for the control of the environmental pollution rate and of purifiers with photocatalytic reactor for the elimination of viruses, bacteria and molds. Special attention has been paid to the verification of all direct contacts with positive people by administering molecular buffers in the case.

The other territorial offices have been progressively reopened, during the year, always with access on a voluntary basis and given the mandatory service requirements (Milan in July and Mestre and Naples in October). Finally, for the Turin headquarter, reopened since December, the new coworking mode has been adopted, with plenty dedicated spaces within the structure. All INWIT employees are also offered the possibility to use the business lounge areas at all other offices located in the Italian territory, expanding the scenario of the available solutions.

For operational activities, both in the field of network development and implementation and for commercial initiatives, an operational instruction has been defined on the measures to be taken to operate safely, in line with the indications provided by the WHO.

Health and safety training

During 2021, special attention was maintained on the information processes to contain the spread of the infection from Covid 19, as regards the measures adopted progressively by the Government and the instruments gradually set up for the control.

The main effort was focused on mandatory training pursuant to Legislative Decree no. 81 of April 9, 2008 and State-Regions Agreements 2011 and 2016 for all company personnel.

Following the risk profiling of personnel into two levels, low and medium, basic and specific low risk course sessions were set up on the e-learning platform. In view of the necessary containment measures of Covid 19, the specific training sessions for medium risk, the training of the managers and the RLS were handled by videoconference. In the last quarter of the year, due to the initial decline in the number of cases, sessions were planned in the presence of mid-level emergency workers, first responders and the Basic Life Support and Defibrillation (BLS/D) course. Overall, drawn up on the basis of specific roles and responsibilities, in 2021 a mandatory training plan was launched in the H&D field, in accordance with Article 37 of Leg. Decree 9 April 2008, n. 81, which has seen a total of 478 sessions completed, providing more than 2.800 hours of training of the 3.300+ sessions.

H&S Training Plan			
Course	duration	n. participants	Total hours
Basic training course	4	235	940
Low risk specific course	4	31	124
Medium risk specific course	8	104	832
Full Executive Course	16	3	48
Executive Course (Modules 3 and 4)	8	6	48
Training course	8	46	368
Course for RLS	32	1	32
First aid course	12	20	240
Average risk Fire Course	8	18	144
BLS/D (defibrillator) course	5	14	70
Total	105	478	2.846

HEALTH AND SAFETY MANAGEMENT SYSTEM AT WORK

GRI 403-1; 403-2; 403-3;

INWIT, in line with the sustainability path undertaken, decided to equip itself, by 2023, with a Health and Safety Management System according to ISO 45001:2018, integrated with environmental issues according to ISO 14001:2015.

During 2021, the implementation process of the HSE management system was started, and all the documentation corpus was prepared, which includes the analysis of the organization, the environment, the processes, the risks and the opportunities, as well as the definition of **19 procedures, 12 operating instructions and a guideline**.

During the year, the INWIT **Risk Assessment Paper** was completely rewritten after a careful assessment of the processes of the new operational organization. With regard to personnel, two risk profiles have been defined on the basis of the processes in which they operate.

A process of health surveillance has been completed for employees in Rome, which will be extended to other regional offices in 2022. The base of emergency and first aid workers has been significantly expanded to be ready for large operational flexibility when the offices will be reopened, and mandatory return will be applied at least two days a week. Specific training on defibrillator intervention techniques was provided, and consistently, for the Rome office, two defibrillators were purchased.

In line with the new **accidents, injuries and near misses procedure**, all events are analyzed in detail with the participation of workers and the involvement of other stakeholders, whether they cause injury or disease (injury) or have only the potential to do so (near miss), as well as any dangerous behavior, in order to determine the causes, to take action to keep them under control, to define corrective measures to eliminate them, so that they do not occur again or elsewhere.

The **procedure for health and safety audits and controls** defines the actions for carrying out health and safety checks to be conducted in order to ensure the maintenance of safety levels, both at sites and at company offices, working environments and equipment, contractor management and control, professional monitoring and construction site management. Regarding the latter, the activities performed under construction site scheme under Title IV or Title I contract by professionals and external contractors were subject of an onsite inspection campaign through audits. During 2021, this activity was carried out by the HSE function directly and through the inspectors of a dedicated third-party company: a total of more than 250 audits on site were carried out.

In addition, personal protective equipment has been assigned based on the risk assessment of site inspection and site acquisition, site supervision and safety audits on sites and offices.

INJURIES OF EMPLOYEES

GRI 403-9

During 2021 there were no injuries at work for employees or external workers, while there was a case for a contractor. In 2021 the INWIT's employee absenteeism rate was 0,65%¹⁰. The table below shows data on employee injuries in 2020 and 2021.

Injuries at work		
N° cases	2021	2020
Number of work injuries that can be recorded	0	1
▶ of which, the number of deaths caused by injuries at work	0	0
▶ of which, injuries at work with serious consequences (excluding deaths)	0	0
▶ Recordable work injuries rate ¹¹	0	3,62
▶ Death rate due to injuries at work	0	0
▶ Serious rate injuries at work	0	0

¹⁰ Slight contusion with three days prognosis.

¹¹ The rates are calculated by dividing by each type of accident (recordable, death and serious) the number of hours worked (in 2020 hours worked 276185 and in 2021 hours worked 359820) multiplied by a multiplier in the INWIT case, taking into account the size of the company, 1.000.000.



[NATURAL CAPITAL]



ENVIRONMENTAL PROTECTION

GRI 306-1

According to the environmental impacts reduction goals set by EU throughout the European Green deal and confirmed by the National Recovery and Resilience Plan, among the most challenging targets of INWIT's sustainability plan is the achievement of the "carbon Neutral" as of 2024. The Society intends to achieve zero emission target by 2024 through a strategy to reduce and offset residual emissions, and implementing actions to maximize resource efficiency.

To meet this challenge, INWIT continues its commitment to the path, undertaken last year, aimed to progressive improve of the monitoring activities of natural resources use (materials and energy) and environmental impacts generated by the organization's activities. INWIT operates in a research perspective, definition and implementation of actions and initiatives to achieve the environmental objectives defined in the Sustainability Plan.

In 2021, INWIT worked for the definition and implementation of an Environmental Management System to be adopted according to the ISO 14001 standard and of an Energy Management System according to the ISO 50001 standard, both considering the certification achievement by 2023.

In this direction, **INWIT adopts an Health, Safety and Environment Policy in 2021**, establishing the following environmental commitments:

Health, Safety and Environment Policy

- ▶ identify and assess direct and indirect environmental aspects, including impacts on biodiversity;
- ▶ identify new technologies to reduce raw materials consumption and the use of non-renewable energy sources;
- ▶ to reduce its impact referring to greenhouse gas production, through the production and purchase of energy from renewable sources and the choice, optimization and reduction of the refrigerant gases use;
- ▶ managing waste by adopting strategies geared toward recycling and recovery, with the aim of increasing the life cycle of materials and products;
- ▶ control and reduce all emissions that could be polluting or disturbing to local communities during the construction, operation and disposal of technological infrastructures, also with the cooperation of our customers;
- ▶ improve the landscape impact of their technology infrastructure.

Among the initiatives undertaken in the framework of the definition of the Environmental Management System, INWIT has adopted a new waste management process, aimed at increasing the efficiency in the resources use and maximizing the recovery and recycling of waste materials related to its activities. Actions have therefore been prepared to monitor and trace these materials, as described in the "circular Economy" paragraph.

In continuity with the last year, the management of energy-related issues have been entrusted to a dedicated "Energy Management" function, which deals in particular with the management of the active and passive cycle, the forecasting phase, the management of the energy connections, as well as the activities related to energy and carbon management.

ENERGY MANAGEMENT

GRI 302-1, 302-3

ENERGY MANAGEMENT SYSTEM

With regard to energy issues, in 2021, INWIT has adopted an **Energy Policy** that expresses the commitments made by the Board and, in concert, by the entire Organization, in relation to the management and continuous improvement of its energy performances.

In order to pursue these aims, integrating within the Policy the concepts of sustainability related to its own business activities and processes, INWIT is implementing **an Energy Management System according** to UNI EN ISO 50001:2018, which Certification has been planned by 2023.

In general, the commitments mentioned and entered by INWIT include, in summary, principles such as:

- ▶ the optimal management of its energy uses, constantly evaluated to optimize its performance, using the best technologies available on the market, both in the design and in the supply of the materials used;
- ▶ the effective contribution to the reduction of the environmental impact caused by its business;
- ▶ the centrality of all workers in the energy management process, achieved through appropriate training and information activities.

Consistent with the economic and financial goals and with the company's industrial plan, supporting the will to ensure the availability of the information and the human and economic needs for the implementation of the energy policy obligations, INWIT has prepared a specific Manual which formalizes the structure of its Energy Management System and which serves as a link for the remaining complex document body provided for by the Management System.

Finally, with the aim of guaranteeing and coordinating the implementation, maintenance and monitoring of the Energy Management System with a view to continuous improvement, INWIT has set up **an Energy Management Group**, called **Energy Team**, as a reference structure for both internal communication between functions and with the high direction, with regard to the SGE itself and its operation.

ENERGY EFFICIENCY GOALS AND ACTIONS

As foreseen in the Sustainability Plan, INWIT has defined **a climate strategy** with specific objectives of energy efficiency and emission reduction, in which it is expected to:

In general, the commitments mentioned and assumed by INWIT contemplate, in summary, principles such as:

- ▶ install photovoltaic plants at sites by 2024 for a total power of about 400 kW per year. In 2021, the operation was started with the installation of 32 photovoltaic plants with a power of 124 kWp;
- ▶ implement energy efficiency solutions such as the adoption of free cooling, i.e. the use of external air in certain climatic conditions for the conditioning of the environments where the operators' plants are installed. In particular, INWIT plans to install more than 1.000 plants by 2024, in addition to the 300 plants installed in 2021 with a steady-state energy saving of 2.600 MWh per year;
- ▶ install more than 1.000 kits of new high efficiency "current rectifiers", which reduce the loss of direct current energy transformation, as it must be provided to the operators we host at our sites, thus achieving efficiency by reducing consumption. These plants are added to the 1.153 current rectifiers realized in 2021, with an energy saving of 3.200 MWh per year;
- ▶ to reach 100% of electricity from renewable sources as early as 2022. In 2021, this share of supply was 69%, going over 60% as foreseen by the Sustainability Plan.

Phase Change Material

Aiming to be at the forefront with regard to the solutions that the market offers, INWIT has conducted a test on an innovative technology called “PCM phase Change material” in the context of radio base stations, which could lead to the elimination of traditional cooling systems (air conditioners). This is the first phase - ¹²**proof of concept (PoC)** (referred to in the Intellectual Capital chapter) - defined for 2021, of the **“Advanced Energy Sustainability” project**, which aims to control the peak of day temperature by accumulating heat in the PCM battery, then releasing

it during the night cool hours. The implementation of this innovative technology would enable significant economic savings and environmental benefits to be achieved in the thermal management of shelters. The second phase, for 2022, is **the small-scale trial** that would plan to install the system on 20 plants distributed in the national territory, in order to optimize hardware, software and processes to minimize costs and maximize benefits. The third phase, the **large-scale Rollout**, would involve installations on a significant number of SRBs between 2023 and 2024.

ENERGY CONSUMPTION

INWIT's total 2021 energy consumption amounts to 2.595.680 GJ, up 25% compared to 2020, when the management of Vodafone Towers sites purchased from INWIT was included in the consumption monitoring and related emissions as of 31 March 2020.

Consumption is mainly due to the electricity purchase for the radio base stations supply (99% of the total). Smaller quotas are due to the use of fuels such as diesel for the generator supply and gasoline/diesel for motor vehicles.

Table 10 Energy consumption within the organization (GRI 302-19)

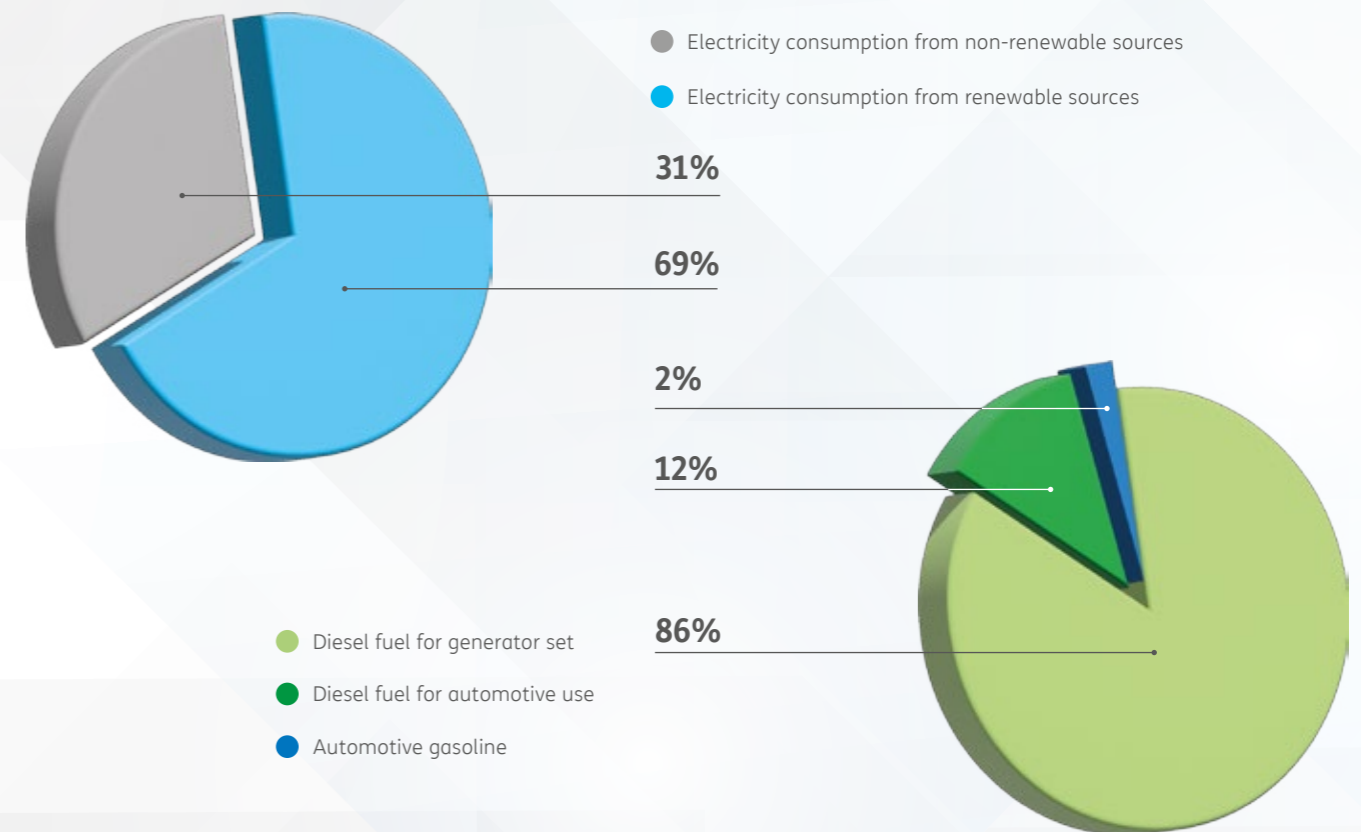
	Unit of measure	2021 ¹³	2020	Delta %
TOTAL ENERGY CONSUMPTION	GJ	2.595.680	2.075.343	25%
NON-RENEWABLE FUELS, of which:	GJ	25.390	21.345	19%
▶ Diesel fuel for automotive use	GJ	2.936	1.749	68%
▶ Diesel fuel for generator use	GJ	21.853	19.426	12%
▶ Gasoline for automotive use	GJ	601	170	254%
TOTAL ELECTRICITY CONSUMPTION	GJ	2.570.290	2.054.000	25%
▶ from non-renewable sources	GJ	785.648	894.330	-12%
▶ from renewable sources	GJ	1.784.642	1.159.670	54%

¹² Materials that, by changing state, absorb and release heat from the environment, and have excellent compatibility with electronic and live equipment.

¹³ It should be noted that in 2020 the sites belonging to Vodafone Towers purchased from INWIT were included in the consumption monitoring as of March 31, 2020. This results in an increase in 2021 compared to 2020. In addition, in addition to the reduced scope, the figure reported on the consumption of self-drive in 2020 is also affected by lower consumption due to the restrictions on the pandemic.

As regards fossil fuel consumption, INWIT consumed a total of 25.390 GJ in 2021, the largest of which, 86%, was allocated to the diesel fuel supply for generator use.

As shown in detail in the figure below, smaller percentages, equal to 12% and 2% respectively, represent the use of diesel and gasoline for the car park supply.



CLIMATE CHANGE

GRI 305-1, 305-2, 305-3, 305-4

INWIT STRATEGY AND COMMITMENTS

In pursuit of carbon neutrality, in 2021, as foreseen in the Sustainability Plan, INWIT defined and approved its climate strategy, defining actions, initiatives and targets on which to base a solid carbon Neutral goal by 2024 and within which it is expected:

Climate strategy

- ▶ Calculation of the INWIT carbon footprint;
- ▶ Drawing up a scenario analysis;
- ▶ Drawing up the CDP Climate Change questionnaire;
- ▶ Definition of Science based Target according to the Science Based Target initiative;
- ▶ Drawing up the TCFD Report.

According to the carbon Neutral Protocol, the path to reach carbon neutrality involves 4 steps:¹⁴

- 1** Identification of the analysis scope;
- 2** Monitoring and calculation of CO₂ emissions (scope 1 – 2 – 3);
- 3** Definition of emission reduction target and development of a mitigation plan capable of reducing the carbon footprint;
- 4** Emissions reduction and compensation of those which cannot be reduced by means of certified high-quality carbon credits which meet the main internationally recognized criteria.

Figure 13
Path for carbon Neutrality, carbon Neutral Protocol



¹⁴ <https://www.carbonneutral.com/the-carbonneutral-protocol>

SCENARIO ANALYSIS

In 2021, INWIT conducted, **for the first time, an analysis of climate scenarios** according to the recommendations of the Taskforce on Climate related Financial Disclosure (TCFD).

Scenario analysis is a methodology for the definition of useful inputs to strategic plans evaluating the business model of the enterprise over time. It is an exercise designed to test the resilience of the business model under multiple assumptions, enabling a long-term strategic vision to be developed that takes into account the physical and transition risks and opportunities associated with climate change.

The methodology adopted by INWIT has the objective of **identifying the risks and opportunities** of a climate nature deriving from the scenarios analyzed, as well as the qualitative assessment of their effects and impacts on their business. The results are then classified according to:

- ▶ reference scenario parameter,
- ▶ time horizon,
- ▶ TCFD categories,
- ▶ probability and impact (as described below)
- ▶ business effects,
- ▶ economic and financial impacts,
- ▶ management methods.

All the climatic risks analyzed correspond - direct or indirect - to the risks foreseen in the company's ERM process.

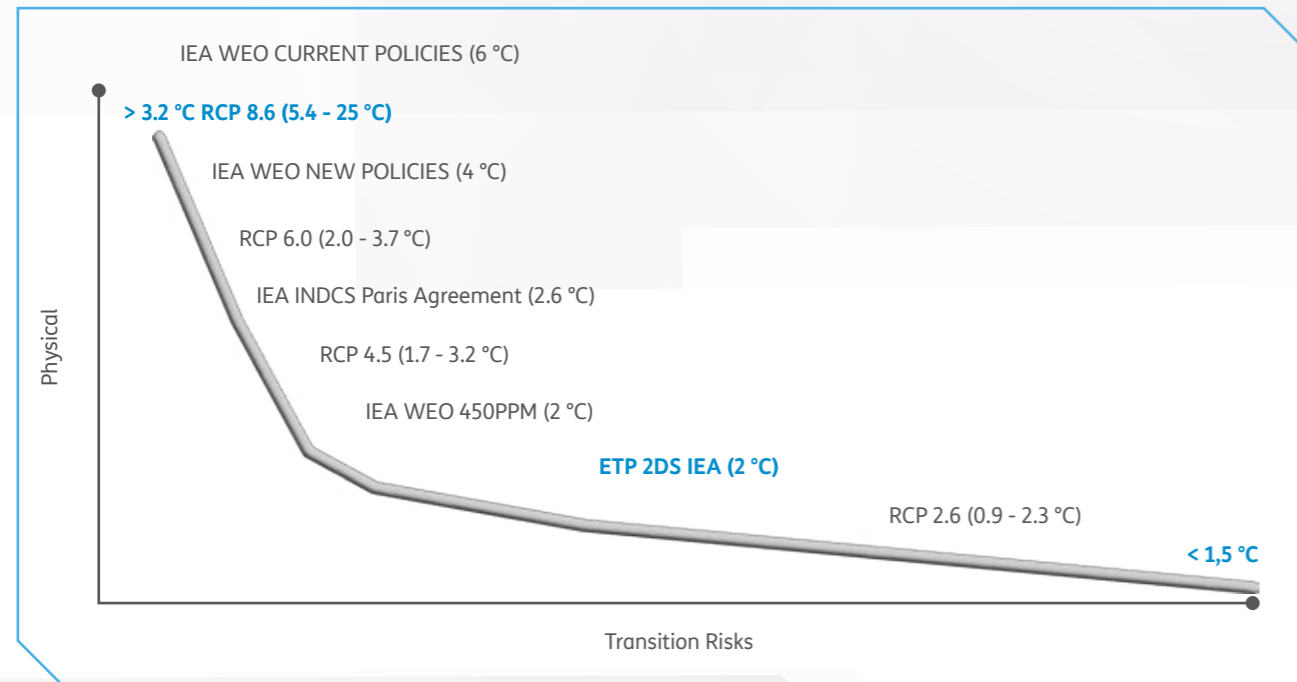
Probability:

- ▶ Probability level that the external environment will change in accordance with the risk or opportunity (depends on the relevant scenario)
- ▶ 4 possible levels: improbable, moderate, probable, very likely

Impact:

- ▶ Relevance to the INWIT business in case of a risk/opportunity event, in terms of margins, investments and asset, operations, commercial positioning
- ▶ 4 possible levels: low, medium, high, critical

The climate scenarios have been identified from nine internationally recognized models, recommended by TCFD and adopted by the International Energy Agency (IEA) and the Intergovernmental Panel on Climate Change (IPCC). **RCP 8.5 and IEA ETP 2DS scenarios were selected** because they offer the ability to assess business resilience in challenging, but plausible, physical and transition conditions.



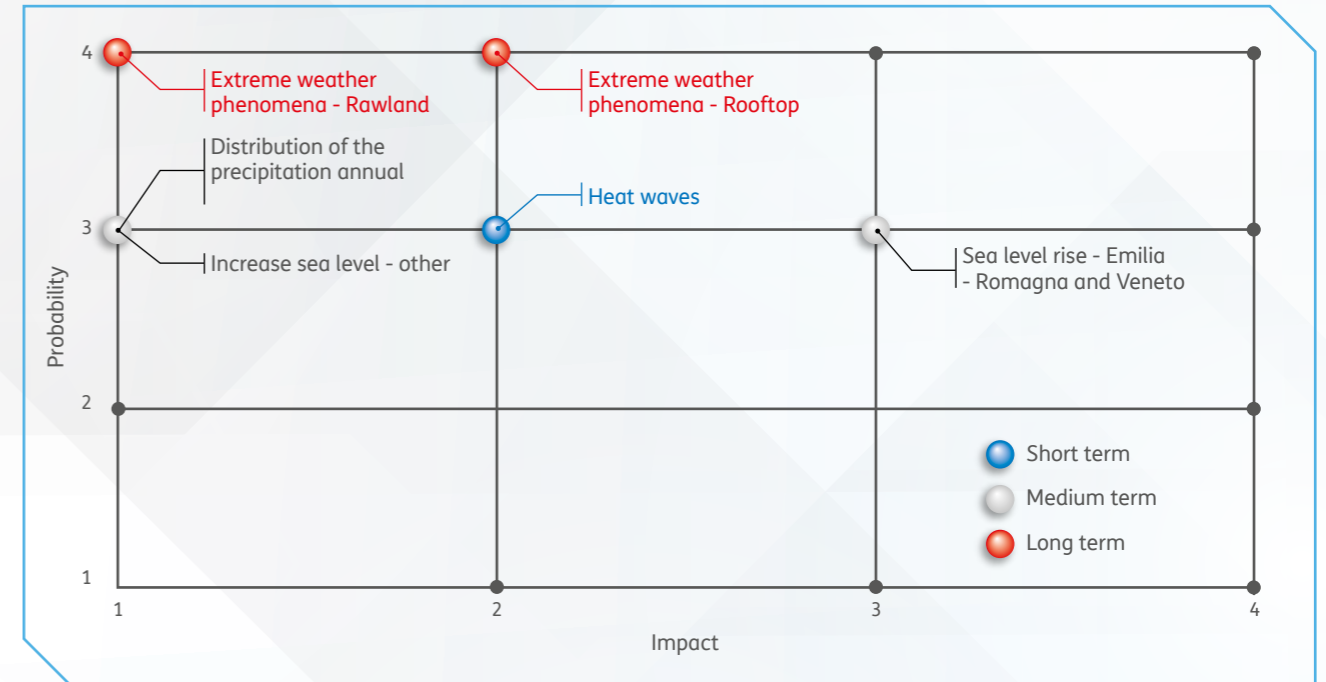
Challenging time horizons have been defined, which go beyond the end of the industrial plan, precisely to enable the analysis to be aligned with the useful life of the assets and with the timing of some of the most important impacts.

Horizon	Short term	Medium term	Long term
Alignment	Industrial plan	UN agenda	EU strategy
Years	2021-23	2024-30	2031-50

4 short-, medium-, and long-term physical risks were identified for the RCP 8.5 scenario¹⁵:

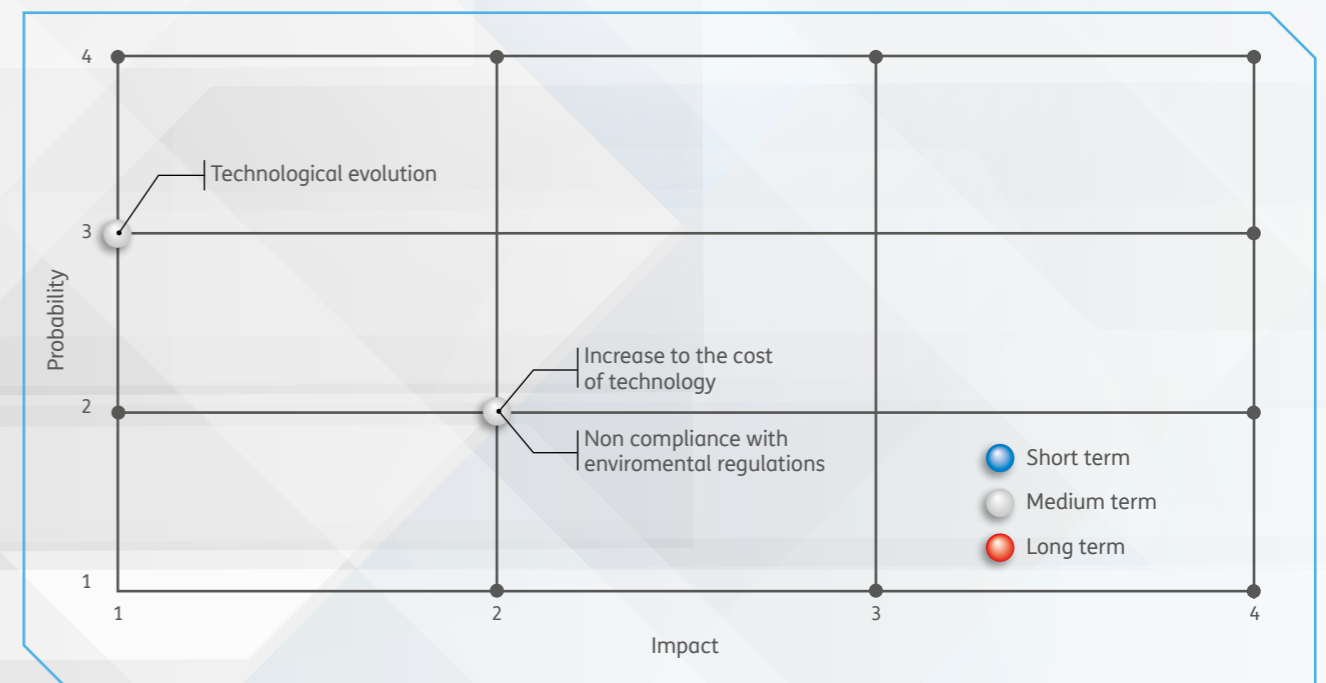
- 2 risks, defined acute and chronic, according to the TCFD classification, with a medium and long term timing, linked to the change of meteoroclimatic phenomena, in particular extreme meteorological phenomena and distribution of annual rainfall. For INWIT, these risks could be greater for Rooftop sites, and less for Rawland sites. They could also result in disruption of service and damage to property and people.
- 1 risk, acute, with a short-term timing, linked to the rise in temperatures, could cause an increase in the energy requirement for cooling sites with indoor equipment.
- 1 long-term, chronic risk, linked to a 3 % increase in sea level, could only concern the Rawland sites in the coastal area of Emilia and Veneto.

¹⁵ Short-term: 2021-2023; Medium-term: 2024-2030; Long-term: 2031-2050.



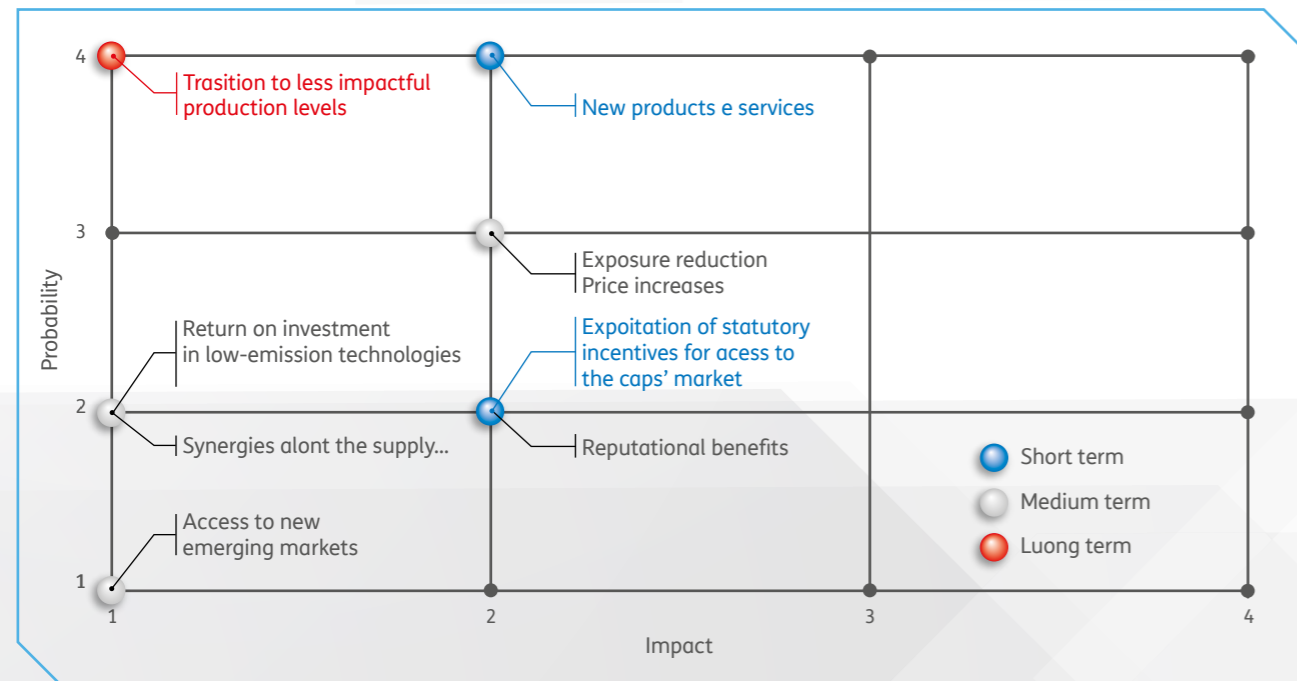
In the ETP 2DS IEA scenario, 3 medium-term transition risks and 8 opportunities have been identified:

- 2 Medium-term risks, defined as technological and policy-regulatory risks, according to the TCFD classification, linked respectively to technological evolution and non-compliance with environmental regulation.
- 1 Medium-term, technological risk related to the increase in the cost of technology.
- These 3 risks would entail the need for INWIT to adapt its infrastructure assets (policifications, power, and conditioning).



In addition to the 3 risks, 8 opportunities have been identified in this scenario:

- ▶ 4 medium-term opportunities linked to GHG reduction: An opportunity from new products and services, and 3 for resilience, on returns on investments in low-emission technologies and reputational benefits associated with decarbonization.
- ▶ A further medium-term opportunity: for energy sources, to reduce exposure to future increases in the prices of energy generated by fossil fuels, in relation to *the reduction of the emission factor of electricity*.
- ▶ 3 short-, medium- and long-term opportunities linked to *the reduction of energy intensity*: one is resource efficiency, given by the transition to less impactful productive levels, and two from markets (leveraging government incentives, tax cuts, access to capital markets, access to new emerging markets, such as carbon, and synergies across the value chain).



DEFINITION OF SCIENCE BASED TARGETS



According to the emission reduction targets set out in the Sustainability Plan and the Climate Strategy, and in order to achieve carbon neutrality by 2024, INWIT, in 2021, has chosen to join the Science based Target Initiative. It supports the establishment of emission reduction targets based on climate science, in order to meet the needs of decarbonization to achieve the goals of the Paris agreement and limit global warming by 2°C above pre-industrial levels and pursue efforts to limit warming to 1,5°C.

By defining this target of reductions, INWIT not only commits itself to acting in line with the achievement of its climate strategy, but also shows its awareness of the issue, increasing its competitive advantage in the transition to a low-carbon economy.

In particular, as envisaged by SBTi, INWIT first undertook an evaluation of the SBTi requirements applicable to the Society, followed by two analyzes. One of the GHG inventory and emission relevance screening data scope 3 and the other of the possible emission reduction actions of scope 1, 2 and 3.

Emission reduction scenarios have been developed and, in the final phase, the targets to be submitted for SBTi approval have been defined.

At the end of December 2021, INWIT presented the target submission form to SBTi, choosing the most ambitious target of maintaining the increase in global warming to within 1.5°C, committing to reduce GHG scope 1 and 2 emissions by 42% by 2030, compared to 2020 levels, and to calculate and reduce the scope 3 emissions.

PREPARATION OF THE CDP CLIMATE CHANGE QUESTIONNAIRE



As further evidence of its commitment, INWIT participated voluntarily in CDP assessment (Carbon Disclosure Project). The objective consisted in developing and maintaining a governance system in line with national and international best practices against climate change, and in this sense making INWIT able to fit into the main ESG sustainability ratings and indices.

Together with more than 13.000 companies, INWIT has been evaluated on the basis of information on governance, impacts, risks and opportunities related to climate change. In December 2021, INWIT received the results of the questionnaire, **earning¹⁶ a score equal to B - Management** making relevant governance and completeness of the reporting of its CO2 emissions issues. For INWIT, the dissemination of its environmental data through the CDP Climate Change platform is a part of its climate strategy launched in the last year, which also passes through a transparent disclosure of its impacts.

DIRECT AND INDIRECT CO₂ EMISSIONS

^{17,18} In accordance GRI Reporting Standards and, more specifically, according to the GHG Protocol Corporate Standard and the GHG Protocol Corporate value Chain Standard, INWIT has, for the first time in 2020, developed the ¹⁹**Group's GHG inventory**, providing the monitoring of **carbon emissions** generated by INWIT activities.

In particular, the GHG inventory, in accordance with the standards requirements, focuses on all the activities for which the Company has full financial control and reports the emissions into three categories:

- ▶ Direct emissions - scope 1;
- ▶ Indirect emissions by energy consumption - scope 2;
- ▶ Other indirect emissions - scope 3.

According to the carbon neutrality goal by 2024, INWIT is committed to the management of its emissions. First step of this is a complete reporting of the GHG inventory.

¹⁶ The CDP score can be: "Leadership", "Management", "Awareness", "Disclosure".
¹⁷ GRI 305 emissions (2016).pdf
¹⁸ GHG Protocol Corporate Accounting and Reporting Standard.pdf
¹⁹ Corporate value Chain (Scope3) Accounting Reporting Standard.pdf

Table 11 Direct and indirect emissions (GRI 305-1; 305-2; 305-3)

		2021	2020 ²⁰	Delta %
Total Direct emissions - scope 1*	tCO₂eq	2.694	2.433	11%
Direct Fuel emissions – scope 1	tCO₂eq	1.761	1.500	17%
Diesel fuel for automotive use	tCO ₂ eq	204	123	66%
Diesel fuel for generator use	tCO ₂ eq	1.515	1.365	11%
Gasoline for gasoline use	tCO ₂ eq	42	12	250%
Direct emissions of refrigerant gases** - scope 1	tCO₂eq	933²¹	933	0%
Indirect emissions - scope 2 - Location based***	tCO₂eq	191.772	165.461	16%
Electricity from renewable sources	tCO ₂ eq	133.154	93.418	43%
Electricity from non-renewable sources	tCO ₂ eq	58.618	72.043	-19%
Indirect emissions - scope 2 - Market based****	tCO₂eq	100.170	115.766	-13%
Indirect emissions - scope 3***	tCO₂eq	68.589	47.899	43%
Goods and services purchased	tCO ₂ eq	8.703	5.623	55%
Capital goods	tCO ₂ eq	25.028	14.549	72%
Indirect emissions for fuel and energy consumption	tCO ₂ eq	31.424	24.016	31%
Transport and Distribution	tCO ₂ eq	203	80	154%
Rental assets upstream	tCO ₂ eq	3.231	3.631	-11%
TOTALE	tCO₂eq	263.055	215.793	22%

* <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2021>
 ** DEFRA 2021_refrigerator
 *** ISPRA 2020 <https://www.isprambiente.gov.it/>
 **** AIB 2021 <https://www.aib-net.org/facts/european-residual-mix>

The direct emissions – scope 1 linked to the use of fossil fuels in 2021 amounts 1.761 tCO₂eq, while those from refrigerant gases amounts 933 tCO₂eq.

Concerning indirect emissions related to scope 2 electricity consumption, INWIT carries out the analysis both with the Market based (MB) approach, which attributes a zero emission factor for energy consumption deriving from renewable sources, as well as according to the Location based (LB) approach. This one takes into account the average emission factor of the national electricity grid. The table below shows the details of the energy emissions generated by INWIT during the two-year period 2020/2021.

²⁰ The data for 2020 are re-exposed
 In 2020 the sites belonging to Vodafone Towers purchased by INWIT were included in the consumption monitoring and related emissions from 31 March 2020. The result is a more significant increase in the carbon footprint calculated by LB methodology in 2021 than in 2020.
²¹ In the absence of primary data of amounts of refill and losses of refrigerant gases in the atmosphere due to air-conditioning systems and systems, these Scope 1 emissions have been estimated from the demographic data of the installed systems. The same value was used for 2020 to build an aligned baseline.

In 2021, scope 2 LB emissions increased by 16%, while MB emissions decreased by 13% compared to the previous year, totaling approximately 191.772 tCO₂eq and 100.170 tCO₂eq respectively.

Providing a continuous improvement, INWIT in 2021 extended its emission reporting scope by including in the analysis, in addition to scope 3 emissions related to the goods transport and products purchased, emissions related to further categories of the GHG Protocol: Cat 1 goods and services purchased; Cat 2 Capital goods; Cat 3 indirect emissions related to energy consumption; Cat 8 upstream leased assets. The calculation was also made for comparative purposes for the year 2020.

The total indirect emissions – scope 3 in 2021 amounts 68.589 tCO₂eq.

The emissions linked to goods purchase for the realization of operational and maintenance activities, have been calculated by mapping all the journeys made for the transport of the materials from the source of supply to the distribution center of Maddaloni (CE), managed entirely by INWIT. In 2021, more than 1.800 tons of goods and materials were supplied, including batteries, power stations, air conditioners and electrical switchboards. Taking into account the types of vehicles used and the corresponding emission factors, it was calculated that in 2021 the transport activities of INWIT for material supply generated 202,72 tCO₂eq, an increase compared to the previous year.

Emissions from network losses from INWIT's energy supply also increased compared to 2020. In detail, in 2021 the emissions linked to the network losses were 10.531tCO₂eq, while in 2020 the emissions were 9.266 tCO₂eq. A reduction between 2020 and 2021 is shown, instead, for the emissions of leased goods equal to 3.231 tCO₂eq in 2021, compared to 3.631 tCO₂eq in 2020, mainly due to the disposal of some peripheral sites.

In view of the achievement of the carbon Neutrality target in 2024, thanks to the energy efficiency works already implemented by INWIT and described above, in 2021, that Company carried out actions that allow a steady-state saving of 1.572 tons of CO₂eq. as shown in the table below.

Emissions avoided 2021			
Plant	UdM	Energy saving	tCO ₂ eq. avoided
Free cooling	kWh	2.640.000	709
Current Rectifiers	kWh	3.211.000	863

By monitoring the emissions in relation to INWIT activities, and in particular by comparing the carbon footprint with INWIT's turnover, as well as the number of sites, it can be seen that in 2021 the emission intensity (calculated with the location-based approach) is equal to about 247,7 tCO₂eq/€ and equal to about 8,38 tCO₂eq issued for each site. This index is up compared to 2020, but the increase is small in proportion to the increase in the number of sites and also considering that consumption recorded in 2020 includes the acquisition of new sites from Vodafone Towers on 31 March 2020.

Emission intensity (scope 1 + scope 2 “Location based”)			
Emission intensity	2021	2020	Delta %
Emission intensity (based on turnover)	247,7	245,68	0,8%
Emission intensity (based on number of sites)	8,38	7,21	16,2%

By monitoring the emission intensity index in relation to INWIT's turnover and the number of sites, according to the Market based approach, the benefit of a higher supply of energy from renewable sources in 2021 compared to 2020 is evident. In fact, the emission intensity index decreases by 15%.

Emission intensity (scope 1 + scope 2 "Market based")			
Emission intensity	2021	2020	Delta %
Emission intensity (based on turnover)	131,0	178,17	-26,5%
Emission intensity (based on number of sites)	4,43*	5,23	-15,3%

CIRCULAR ECONOMY

GRI 306-3, 306-4, 306-5

Circular Economy plays a central role among INWIT commitments. In fact, the entire network of INWIT towers and microcells respond very well to the logic of the product as a service, and in the specific case of tower as a service, given the role of neutral host held by INWIT. In fact, the Company makes all its infrastructures available (also ensuring maintenance) to several customers, who use them without being owners; at the same time, these towers will offer different services to operators.

The innovative infrastructures realized with a vision of circular economy such as the wooden tower and the fast-site, described in the intellectual capital, represent an example of how, in addition to the business itself of INWIT, infrastructure solutions can be identified that include the focus of environmental aspects throughout their life cycle.

Among the circular economy initiatives put in place by INWIT, it should also be highlighted the replacement of lithium batteries to power the sites in the Localities without the possibility of connection to the network. Lithium batteries are characterized by a longer life cycle (average life three times longer), by a smaller size and weight and therefore able to store more energy. Increased delivery times and with an integrated Battery Management System with the possibility of direct remote control. In 2021, a total of 50 200ah kits were replaced. To strengthen the commitments, INWIT has also inserted criteria of circularity in the process of purchase of goods and services, applicable to the two types of purchase in competition and in negotiation on the basis of the categories of goods.

INWIT WASTE MANAGEMENT

GRI 306-3; 306-4; 306-5

With a new maintenance contract, a new model of material management has been introduced that provides the use of the main warehouse of Maddaloni (CE) to which, for possible flexibility requirements, three territorial deposits are added.²²

²² Calvignasco in the North West, Lendinara in the North East and Massa Martana in the Center.
* With the methodology applied last year, the 2021 KPI is equal to 2.48, against 2.75 in 2020.

The process involves the transfer of all the materials taken from the sites during the implementation and reclamation phase toward the Maddaloni warehouse: here materials such as air conditioners, energy stations, carpentry/poles, batteries, etc. are analyzed in terms of functionality and possible internal reuse. In the negative case, that is if, following verification, these materials are not recoverable for any purpose, they are considered waste and directed toward the waste recovery, treatment and disposal center. The waste delivered to this center is treated in order to identify all the components that can be recovered (for example, all the individual components of a battery can be recovered: Lead and its compounds, sulfuric acid and plastics).

- 367 air conditioners weighing 77,75 tons;
- 888 batteries weighing 24,435 tons
- electrical material consisting of 729 items distributed among energy stations, switchboards, rectifiers, etc., for a total weight of 43,205 tons.

In view of the nature of the materials disposed of during 2021 - air conditioners, batteries and electrical equipment (energy stations, rectifiers, electrical switchboards) - a significant **material recovery of 97%** of the 145 tons of waste produced was achieved. In particular, a single significant waste disposal operation was carried out in 2021, covering three lots of materials:

Table 12 Hazardous and non-hazardous waste diverted from disposal and directed to disposal, with % recycled waste

Waste type	UoM	TOTAL	Not sent for disposal		Sent for disposal		% Recycling of the total waste generated
			Recycled	Incineration (without energy recovery)	Landfill		
Hazardous waste	ton	102,185	101,062	0,024	1,099		98,9%
Air-conditioning units	ton	77,750	76,651		1,099		98,6%
Batteries	ton	24,435	24,411	0,024			99,9%
Non-hazardous waste	ton	43,225	39,997		3,228		92,5%
Electrical material	ton	43,225	39,997		3,228		92,5%
TOTAL WASTE PRODUCTION	ton	145,410					97%

[ANNEXES]



DETAIL TABLES RELATING TO HUMAN CAPITAL KPIs

Table 13 Diversity in government bodies and among employees (GRI 405-1)

Composition of the Board of Directors by gender and age group								
N. people	to 31 december 2020				to 31 december 2021			
	<30 years	30-50 years	>50 years	Total	<30 years	30-50 years	>50 years	Total
Men	-	2	5	7	-	2	5	7
Women	-	2	4	6	-	2	4	6
Total	-	4	9	13	-	4	9	13

Total number of employees per location, region, and gender

To 31.12.2020

N. people	North			Center and Sardinia			South and Sicily		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Executives	4	0	4	10	3	13	1	0	1
Managers	8	2	10	19	9	28	3	0	3
Employees	29	18	47	34	32	66	26	8	34
Total	41	20	61	63	44	107	29	8	38

Total number of employees per location, region, and gender

To 31.12.2021

N. people	North			Center and Sardinia			South and Sicily		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Executives	4	1	5	11	3	14	1	0	1
Managers	8	2	10	21	13	34	3	0	3
Employees	36	23	59	42	39	81	28	11	39
Total	48	26	74	74	55	129	32	11	43

Percentage of employees by job category and gender						
To 31.12.2021						
Professional category	To 31 December 2020			To 31 December 2021		
	Men (% on category)	Women (% on category)	% of total organic	Men (% on category)	Donne (% su categoria)	Women (% on category)
Executives	83%	17%	9%	80%	20%	8%
Managers	73%	27%	20%	68%	32%	19%
Employees	61%	39%	71%	59%	41%	73%
Total	65%	35%	100%	63%	37%	100%

Percentage of employees by job category and age group								
Al 31.12.2021								
Professional category	Al 31 dicembre 2020				Al 31 dicembre 2021			
	<30 years	30-50 years	>50 years	Total	<30 years	30-50 years	>50 years	Total
Executives	0%	11%	89%	100%	0%	20%	80%	100%
Managers	0%	32%	68%	100%	0%	34%	66%	100%
Employees	5%	51%	44%	100%	5%	51%	44%	100%
Total	3%	44%	53%	100%	4%	45%	51%	100%

Table 14 Ratio of basic salary and remuneration of women to men (GRI 405-2)²³

Ratio to female and male total remuneration			
Total remuneration	2020	2021	Delta
	Women-to-Men ratio	Women-to-Men ratio	
Executives (excluding CEO)	-31%	-31%	0%
Managers	-3%	-1%	-53%
Employees	-8%	-9%	12%
Total	-29%	-26%	-9%

Ratio to female and male fixed remuneration			
Wage	2020	2021	Delta
	Women-to-Men ratio	Women-to-Men ratio	
Executives (excluding CEO)	-29%	-26%	-11%
Managers	-4%	-4%	-21%
Employees	-7%	-7%	-10%
Total	-25%	-21%	-16%

²³ The "basic salary" includes the recurring fixed salary of employees, while the "total salary" includes the following variable items: MBO a target 2021, PIV sales incentives 2021 a target; Canvass 2021 a target; UT disbursed 2021; LTI plan cycle 2021 at fair value.

Table 15 New employee hires and employee turnover by age group, gender and region (GRI 401-1)

New hires										
N. people	2020					2021				
	<30	30-50	>50	Total	Recruitment rate %	<30	30-50	>50	Total	Recruitment rate %
Men	1	26	43	70	52%	2	22	3	27	18%
Women	4	26	7	37	51%	2	20	2	24	26%
Total	5	52	50	107	52%	4	42	5	51	21%
Turnover %	71%	58%	46%	52%		44%	38%	4%	21%	

Terminations										
N. people	2020					2021				
	<30	30-50	>50	Total	Turnover %	<30	30-50	>50	Total	Turnover %
Men	-	1	10	11	8%	1	2	4	7	5%
Women	-	8	4	12	17%	1	3	-	4	4%
Total	-	9	14	23	11%	2	5	4	11	4%
Turnover %	0%	10%	13%	11%		22%	5%	3%	4%	

Table 16 Percentage of employees receiving an assessment of performance and professional development (GRI 404-3)

Employees who receive a periodic performance and career assessment by gender and job category				
N. people	2020		2021	
	Total employees receiving performance ratings	Total %	Total employees receiving performance ratings	Total %
Executives	18	100%	20	100%
Managers	41	100%	47	100%
Employees	147	100%	179	100%
Total	206	100%	246%	100%

N. people	2020		2021	
	Total employees receiving performance ratings	Total %	Total employees receiving performance ratings	Total %
Men	134	100%	154	100%
Women	72	100%	92	100%
Total	206	100%	179	100%

TABLE LINKING LEG. DECREE 254/2016, GLOBAL COMPACT PRINCIPLES, MATERIAL TOPICS AND SUSTAINABILITY PLAN



GRI CONTENT INDEX

INWIT's 2021 Integrated Report was drawn up on the basis of the Global Reporting Initiative GRI Standard guidelines following a GRI-referenced approach. The following table provides information based on standard GRI guidelines with reference to INWIT's Materiality analysis.

GRI Standard		Page references/notes
GENERAL DISCLOSURE		
Profilo dell'organizzazione		
102-1	Name of the organization	
102-2	Activities, brands, products, and services	
102-3	Location of headquarters	
102-4	Location of operations	
102-5	Ownership and legal form	
102-6	Markets served	
102-7	Scale of the organization	
102-8	Information on employees and other workers	
102-9	Supply chain	
102-13	Membership of associations	
Strategy		
102-14	Statement from senior decision-maker	
102-15	Key impacts, risks, and opportunities	
Ethics and integrity		
102-16	Values, principles, standards, and norms of behavior	
Governance		
102-18	Governance structure	
102-22	Composition of the highest governance body	
102-38	Annual total compensation ratio	
Stakeholder engagement		
102-40	List of stakeholder groups	
102-41	Collective bargaining agreements	

GRI Standard		Page references/notes
GENERAL DISCLOSURE		
Reporting practice		
102-47	List of material topics	
102-50	Reporting period	
102-51	Date of the most recent report	
102-52	Reporting cycle	
102-53	Contact point for questions regarding the report	
102-54	Claims of reporting in accordance with GRI Standards	
102-55	GRI content Index	
102-56	External Assurance	

GRI Standard		Page references/notes	Omission
SPECIFIC STANDARD DISCLOSURE			
ECONOMIC INDICATORS			
MATERIAL TOPIC: Economic performance (2016)			
103-1	Explanation of the material topic and its Boundary		
103-2	The management approach and its components		
103-3	Evaluation of management approach		
201-1	Direct economic value generated and distributed		
MATERIAL TOPIC: Anti-corruption (2016)			
103-1	Explanation of the material topic and its Boundary		
103-2	The management approach and its components		
103-3	Evaluation of management approach		
205-1	Operations assessed for risks related to corruption		
205-2	Communication and training about anti-corruption policies and procedures		
205-3	Confirmed incidents of corruption and actions taken		During 2021 there have no been recorded corruption cases

GRI Standard	Page references/notes	Omission
SPECIFIC STANDARD DISCLOSURE		
ECONOMIC INDICATORS		
MATERIAL TOPIC : Tax (2019)		
103-1	Explanation of the material topic and its Boundary	
103-2	The management approach and its components	
103-3	Evaluation of management approach	
207-1	Approach to tax	
207-2	Tax governance, control, and risk management	
207-3	Stakeholder engagement and management of concerns related to tax	
ENVIRONMENTAL INDICATORS		
MATERIAL TOPIC: Energy (2016)		
103-1	Explanation of the material topic and its Boundary	
103-2	The management approach and its components	
103-3	Evaluation of management approach	
302-1	Energy consumed within the organization	
MATERIAL TOPIC: Emissions (2016)		
103-1	Explanation of the material topic and its Boundary	
103-2	The management approach and its components	
103-3	Evaluation of management approach	
305-1	Direct (scope 1) GHG emissions	
305-2	Energy indirect (scope 2) GHG emissions	
305-3	Other indirect (scope 3) GHG emissions	
305-4	Intensity of GHG emissions	
MATERIAL TOPIC: Waste (2020)		
103-1	Explanation of the material topic and its Boundary	
103-2	The management approach and its components	

GRI Standard	Page references/notes	Omission
SPECIFIC STANDARD DISCLOSURE		
ENVIRONMENTAL INDICATORS		
MATERIAL TOPIC: Waste (2020)		
103-3	Evaluation of management approach	
306-1	Waste generated and significant waste- related impacts	
306-3	Waste generated	
306-4	Waste diverted from disposal	
306-5	Waste direct to disposal	
MATERIAL TOPIC: Environmental Compliance (2016)		
103-1	Explanation of the material topic and its Boundary	
103-2	The management approach and its components	
103-3	Evaluation of management approach	
307-1	Non-compliance with environmental laws and regulations	During 2021 there were no cases of non-compliance with environmental laws and regulations
MATERIAL TOPIC: Supplier environmental assessment (2016)		
103-1	Explanation of the material topic and its Boundary	
103-2	The management approach and its components	
103-3	Evaluation of management approach	
308-1	New suppliers that were screened using environmental criteria	
SOCIAL INDICATORS		
MATERIAL TOPIC: Employment (2016)		
103-1	Explanation of the material topic and its Boundary	
103-2	The management approach and its components	
103-3	Evaluation of management approach	
401-1	New employee hires and employee turnover by age group, gender, and region	
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	

GRI Standard	Page references/notes	Omission
SPECIFIC STANDARD DISCLOSURE		
<i>INDICATORI SOCIALI</i>		
MATERIAL TOPIC: Occupational Health and safety (2018)		
103-1	Explanation of the material topic and its Boundary	
103-2	The management approach and its components	
103-3	Evaluation of management approach	
403-1	Occupational health and safety management system	
403-2	Hazards identification, risk assessment and incident investigations	
403-3	Occupational health services	
403-4	Worker participation, consultation, and communication on occupational health and safety	
403-5	Worker training on occupational health and safety	
403-6	Promotion of workers' health	
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	
403-9	Work-related injuries	
MATERIAL TOPIC: Training and education (2016)		
103-1	Explanation of the material topic and its Boundary	
103-2	The management approach and its components	
103-3	Evaluation of management approach	
404-1	Average hours training per year per employee	
404-3	Percentage of employees receiving regular performance and career development reviews, by gender and by employee category	
MATERIAL TOPIC: Diversity and equal opportunities (2016)		
103-1	Explanation of the material topic and its Boundary	
103-2	The management approach and its components	

GRI Standard	Page references/notes	Omission
SPECIFIC STANDARD DISCLOSURE		
<i>INDICATORI SOCIALI</i>		
MATERIAL TOPIC: Diversity and equal opportunities (2016)		
103-3	Evaluation of management approach	
405-1	Diversity of governance bodies and employees	
405-2	Ratio of basic salary and remuneration of women to men	
MATERIAL TOPIC: Non-discrimination (2016)		
103-1	Explanation of the material topic and its Boundary	
103-2	The management approach and its components	
103-3	Evaluation of management approach	
406-1	Incidents of discrimination and corrective actions taken	During 2021 there have no been recorded discrimination cases
MATERIAL ASPECT: Local communities (2016)		
103-1	Explanation of the material topic and its Boundary	
103-2	The management approach and its components	
103-3	Evaluation of management approach	
413-1	Operations with local community engagement, impact assessments, and development programs	
MATERIAL TOPIC: Suppliers social assessment (2016)		
103-1	Explanation of the material topic and its Boundary	
103-2	The management approach and its components	
103-3	Evaluation of management approach	
414-1	New suppliers that have screened using social criteria	

GRI Standard	Page references/notes	Omission
SPECIFIC STANDARD DISCLOSURE		
INDICATORI SOCIALI		
MATERIAL TOPIC: Customer Privacy (2016)		
103-1	Explanation of the material topic and its Boundary	
103-2	The management approach and its components	
103-3	Evaluation of management approach	
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	During 2021 there have no been recorded complaints regarding breaches of customer privacy and losses of customer data
MATERIAL TOPIC: Compliance (2016)		
103-1	Explanation of the material topic and its Boundary	
103-2	The management approach and its components	
103-3	Evaluation of management approach	
419-1	Non-compliance with social and economic laws and regulations	In 2021 the Company received no significant administrative and judicial sanctions (over the threshold of €10.000) linked to non-compliance with the regulation in the economic, social and environmental areas.
Other material aspects		
MATERIAL TOPIC: Innovation and digitization		
103-1	Explanation of the material topic and its Boundary	
103-2	The management approach and its components	
103-3	Evaluation of management approach	
MATERIAL TOPIC: Quality and inclusiveness of service		
103-1	Explanation of the material topic and its Boundary	
103-2	The management approach and its components	
103-3	Evaluation of management approach	

TABLE LINKING TO GLOBAL COMPACT PRINCIPLES

Global Compact		
Category	Global Compact principle	GRI/KPI
Human rights	1. Make sure that they are not complicit in human rights abuses	414-1
	2. Businesses should support and respect the protection of internationally proclaimed human rights	403-1, 403-2, 403-3, 403-4, 403-5, 403-6, 403-7, 405-1, 405-2, 406-1, 413-1, 418-1
	3. Businesses should uphold the freedom of association and effective recognition of the right to collective bargaining	102-41
Labour	4. The elimination of all forms of forced and compulsory labor	As stated in the Code of Ethics , INWIT undertakes not to take advantage of forced labour or child labour, even indirectly, providing our employees and collaborators with regular employment contracts and monitoring the provisions of works and services contracts, entered into in compliance with the current legislation. INWIT operates exclusively in the national territory and all its employees are covered by collective bargaining agreements. 98,8% have a permanent contract.
	5. the effective abolition of child labor	As stated in the Code of Ethics , INWIT undertakes not to take advantage of forced labour or child labour, even indirectly, providing our employees and collaborators with regular employment contracts and monitoring the provisions of works and services contracts, entered into in compliance with the current legislation. INWIT operates exclusively in the national territory, where child labor is prohibited by law. 51% of employees are > 50 years old, 45% are between 30 and 50 years old and the remaining 4% are under 30.
	6. The elimination of discrimination in respect of employment and occupation	102-8, 401-2, 404-1, 404-3, 405-1, 405-2, 406-1

Global Compact		
Category	Global Compact principle	GRI/KPI
Anti-corruption	7. Businesses should work against corruption in all its forms, including extortion and bribery	102-16, 205-1, 205-2, 205-3
Ambiente	8. Businesses should support a precautionary approach to environmental challenges	302-1, 305-1, 305-2, 305-3, 305-4
	9. Undertake initiatives to promote greater environmental responsibility	302-1, 305-1, 305-2, 305-3, 305-4, 306-1, 306-3, 306-4, 306-5, 307-1, 308-1
	10. Encourage the development and diffusion of environmentally friendly technologies	In line with the Sustainability Plan, INWIT is committed to achieving goals in terms of innovation and sustainability, for more information please refer to the chapters Intellectual capital and Infrastructure capital.

REPORT OF THE AUDITING COMPANY



Independent auditor's report on the company non-financial disclosure

in accordance with article 3 of Legislative Decree 254/2016 and with article 5 of Consob Regulation 20267 of January 2018

To the board of directors of Infrastrutture Wireless Italiane SpA

In accordance with article 3, paragraph 10 of Legislative Decree 254/2016 (the Decree) and with article 5 of CONSOB Regulation 20267/2018, we have performed a limited assurance engagement on the non-financial disclosure of Infrastrutture Wireless Italiane SpA (the Company) as of and for the year ended 31 December 2021, prepared in accordance with article 3 of the Decree, included in the Integrated Report as detailed in the "Methodological note", and approved by the board of directors of Infrastrutture Wireless Italiane SpA on 24 February 2022 (the NFD).

Our review does not extend to the information set out in the "Taxonomy" paragraph of the NFD, required by article 8 of European Regulation 2020/852.

Responsibility of the directors and of the board of statutory auditors for the NFD

The directors are responsible for the preparation of the NFD in accordance with article 3 of the Decree and with the Sustainability Reporting Standards, issued by Global Reporting Initiative in 2016 (GRI Standards). The directors are responsible, in accordance with the law, for the implementation of internal controls necessary to ensure that the NFD is free from material misstatement, whether due to fraud or unintentional errors.

The directors are responsible for identifying the content of the NFD, within the matters mentioned in article 3, paragraph 1 of the Decree, considering the activities and characteristics of the Company and to the extent necessary to ensure the understanding of the Company activities, its trends, its results and related impacts. The directors are responsible for defining the business and organisational model of the Company and, with reference to the matters identified and reported in the NFD, for the policies adopted by the Company and for the identification and management of risks generated or faced by the Company.

The board of statutory auditors is responsible for overseeing, in accordance with the law, the compliance with the Decree.

PricewaterhouseCoopers SpA

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Auditors' independence and quality control

We are independent in accordance with the principles of ethics and independence disclosed in the Code of Ethics for Professional Accountants published by the International Ethics Standards Board for Accountants, which are based on the fundamental principles of integrity, objectivity, competence and professional diligence, privacy and professional behaviour. Our audit firm adopts the International Standard on Quality Control 1 (ISQC Italy 1) and, accordingly, maintains an overall quality control system which includes processes and procedures for the compliance with ethical and professional standard and with applicable laws and regulations.

Auditors' responsibility

We are responsible for expressing, on the basis of the work performed, a conclusion regarding the compliance of the NFD with the Decree and with the GRI Standards. We conducted our engagement in accordance with International Standard on Assurance Engagements 3000 (Revised) – Assurance Engagements Other Than Audits or Reviews of Historical Financial Information (ISAE 3000 Revised), issued by the International Auditing and Assurance Standards Board (IAASB), for limited assurance engagements. The standard requires that we plan and perform procedures to obtain a limited assurance that the NFD does not contain material errors. The procedures performed in a limited assurance engagement are less in scope than those performed in a reasonable assurance engagement in accordance with ISAE 3000 Revised (reasonable assurance engagement) and, therefore, do not provide us with a sufficient level of assurance to become aware of all significant facts and circumstances that might be identified in a reasonable assurance engagement.

The procedures performed on the NFD are based on our professional judgement and consisted of interviews, primarily with Company personnel responsible for the preparation of the NFD, analysis of documents, recalculations and other procedures aimed at obtaining evidence as appropriate.

In particular, we have performed the following procedures:

1. analysis of the relevant matters reported in the NFD relating to the activities and characteristics of the Company, in order to assess the reasonableness of the selection process used, in accordance with article 3 of the Decree and with the reporting standard adopted;
2. comparison of the financial information reported in the NFD with the information reported in the Company financial statements;
3. with reference to the matters specified by article 3 of the Decree, understanding of the following:
 - business and organisational model of the Company;
 - policies adopted by the Company, actual results and related key performance indicators;
 - main risks generated or faced by the Company.



With reference to such matters, we have carried out validation procedures on the information presented in the NFD and other audit procedures as described under point 4. below.

4. understanding of the processes underlying the preparation, collection and management of the qualitative and quantitative material information included in the NFD. In particular, we have held meetings and interviews with the management of Infrastrutture Wireless Italiane SpA and we have performed limited analysis and validation procedures, to gather information about the processes and procedures for the collection, consolidation, processing and submission of the non-financial information to the function responsible for the preparation of the NFD.

Moreover, for significant information, considering the activities and characteristics of the Company:

- a) with reference to the qualitative information included in the NFD, and in particular to the business model, the policies adopted and the main risks, we have carried out interviews and obtained supporting documentation to verify its consistency with available evidence;
- b) with reference to quantitative information, we performed analytical procedures and limited tests, to assess, on a sample basis, the proper consolidation of the information.

Conclusions

Based on the work performed, nothing has come to our attention that caused us to believe that the NFD of Infrastrutture Wireless Italiane SpA as of 31 December 2021 and for the year then ended has not been prepared, in all material respects, in compliance with articles 3 of the Decree and with the GRI Standards, as described in the Methodological note of the NFD.

Our conclusions on the NFD of Infrastrutture Wireless Italiane SpA do not extend to the information set out in the "Taxonomy" paragraph of the NFD, required by article 8 of European Regulation 2020/852.

Milan, 15 March 2022

Signed by

Paolo Caccini
(Partner)

This report has been translated into English from the Italian original solely for the convenience of international readers

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[INTEGRATED REPORT
2021]

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Sharing connections.

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