

## INTEGRATED REPORT 2022



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## LETTER TO STAKEHOLDERS

*Dear stakeholders,*

We are pleased to present our third Integrated Report, containing INWIT's fifth Non-Financial Statement. Our mission is to build and manage shared and digital wireless infrastructures that enable operators and technologies to connect people and objects anytime, anywhere, for the benefit of the communities in which we operate, and which are necessary in the process of digital promotion and transformation for a more sustainable society.

Indeed, digital infrastructure represents an opportunity to build a better country, where advanced services, digital innovation, sustainable resource management, attention to the needs of citizens and the territory, greater well-being, equal opportunities, and a lower environmental impact are the cornerstones of a new model of sustainable development.

At the heart of our strategy for the pursuit of sustainable success is the concept of tower as a service, in line with one of the main business models of circular economic. As a neutral host, through the sharing of our digital infrastructures to more customers, we are able to offer more integrated services, according to a design of the tower as a technological center, ensuring its realization, maintenance, power supply, conditioning and safety.

2022 saw us consolidate and strengthen the path to creating a sustainable business model, which began in 2020. A true paradigm shift, where digitization and sustainability are becoming increasingly synonymous with indistinguishable synonyms. In this new context, our people take on an increasingly central role, and in 2022 we redefined our values, with the aim of building a strong and cohesive corporate culture, capable of attracting talent, improving productivity and employee satisfaction, it also promotes positive relationships with customers, stakeholders and the community. To affirm our values and team spirit we wanted to realize our first INWIT Day, a special day aimed at consolidating the spirit of collaboration and synergy of a team that has achieved important successes in a short time and is now ready to face new challenges.

In 2022, for the first time, we joined the Bloomberg Gender Equality Index and FTSE4Good, two of the main ESG indices, and in these two years we have obtained upgrades to the main ESG ratings mapped, including MSCI, GRESB, CDP, Sustainable Analytics, FTSE Russell.

In line with this path, regarding Climate Change, having obtained the validation by the Science based Target initiative (SBTi) of the target of reducing our CO2 emissions, aligned with scientific community guidance and international agreements to keep global warming below 1.5°C, we have produced our first TCFD Report. The TCFD Report implements the reporting framework defined by the Task Force on

Climate related Financial Disclosure (TCFD) and provides key elements regarding the functions and processes through which the company monitors and manages climate risks and opportunities. the climate objectives that have been set with the relevant metrics for their monitoring, as well as the strategy defined to achieve them.

In our day-to-day action we support the 10 principles of the Global Compact, aware that organizations must promote a sustainable environment and do business in societies that are geared to achieving the Sustainable Development Goals, as defined by UN Agenda 2030. In line with this mandate, we also drafted and sent our Communication on progress in 2022.

We continue along this path, aware that our infrastructure and know-how are essential to create a more connected future and a more inclusive, sustainable and secure society.



**Chairman**  
*eng. Oscar Cicchetti*



**General Manager**  
*dr. Diego Galli*

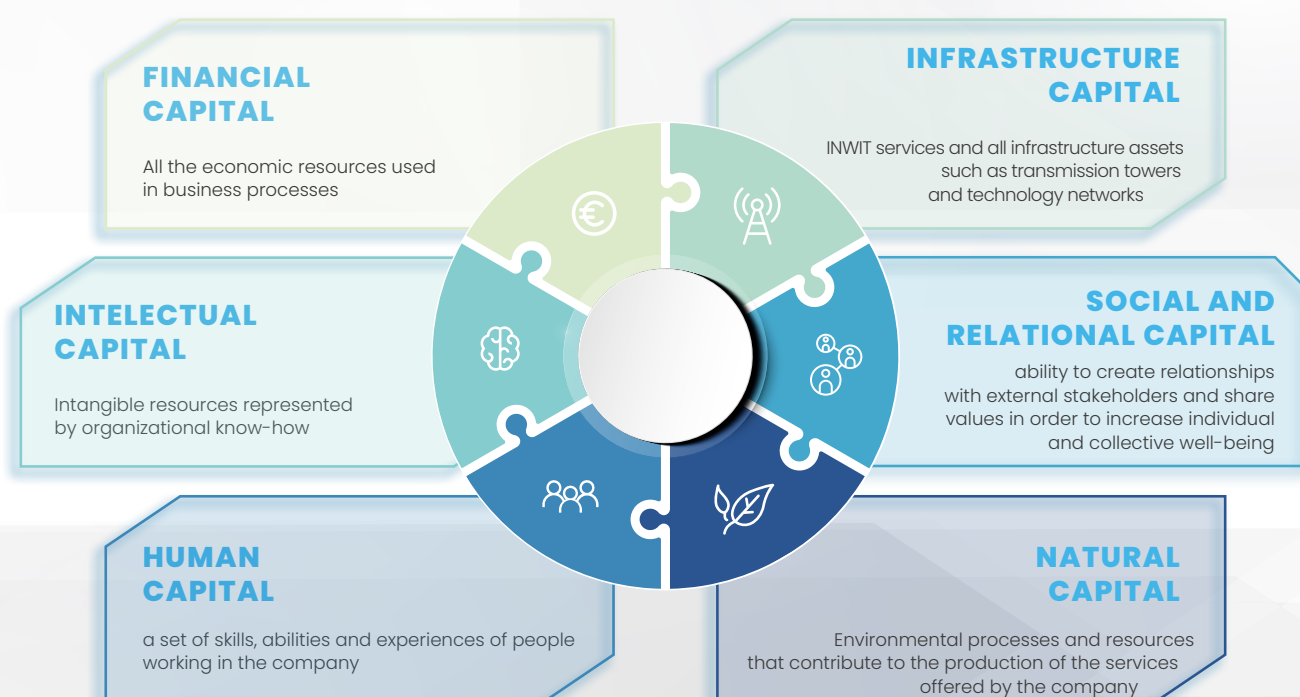


## METHODOLOGICAL NOTE

GRI 2-2; 2-3; 2-4

INWIT, consistent with the sustainability path undertaken, has prepared the third Integrated Report, taking as reference the Integrated Reporting Framework (IR Framework), outlined by the International Integrated Reporting Council (IIRC). The document contains the fifth voluntary non-financial Statement (hereinafter also "DNF") of Infrastrutture Wireless Italiane S.p.A. (hereinafter also "INWIT"), drawn up on a voluntary basis in accordance with Art. 3 and 7 of D. 254/16 (hereinafter also the "Decree") containing information on environmental, social, personnel-related issues, respect for human rights and the fight against corruption to the extent necessary to ensure the understanding of business activities. This DNF also includes disclosure of taxonomy information as required by European Regulation 852/20. This information, prepared on a voluntary basis and contained in the paragraph "Taxonomy" in the financial capital, includes analyzes conducted by INWIT on how and to what extent its activities are associated with economic activities within the meaning of the EU Taxonomy. In particular, while last year the information exclusively included exclusively the share of eligible ("Taxonomy eligible") and non-taxable economic activities in relation to its turnover, capital expenditure and total operating expenditure, this year the analysis includes also the activities aligned ("Taxonomy aligned") with the taxonomy.

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 subdivision by capital, defined as the variables that determine the creation of value:



The purpose of the INWIT Integrated Report is to provide a comprehensive view of strategy, operating model and governance by integrating financial and non-financial information. The initial chapter "Company Profile" describes the fundamental stages of INWIT's history, the sustainability path undertaken through the Sustainability Plan, the Materiality analysis definition process and governance. Managing the risks and opportunities that affect INWIT's ability to create value in the short, medium, or long term.

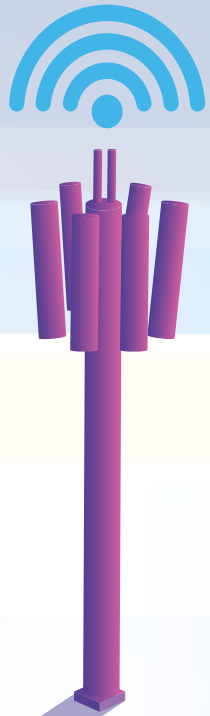
The "Materiality Analysis" paragraph describes the process of defining – based on the demands of the 2021 edition of the GRI standards – the current and potential significant positive and negative impacts for INWIT, from which the material themes for INWIT were identified. This process involved internal and external stakeholders relevant to INWIT.

This Integrated Report, published annually, contains data and non-financial information for the financial year from 1 January 2022 to 31 December 2022. The data for the financial year 2021 are presented for comparative purposes, in order to allow an evaluation of the performance of the Company's activities during the two-year period. INWIT has adopted the indicators set out in the GRI Standards of the Global Reporting Initiative, adopting a GRI "in Accordion" approach starting this year.

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 entered in the document is in line with that of the annual financial report; any perimeter exceptions are appropriately described in the relevant sections of the document. This document was approved by the Board of Directors of Infrastrutture Wireless Italiane S.p.A. on March 02, 2023 and was submitted, in accordance with Legislative Decree no. 254/16 art.3 paragraph 10, limited assurance engagement by PricewaterhouseCoopers S.p.A. according to the criteria set out in ISAE 3000 revised, the revision report of which is attached to this declaration.

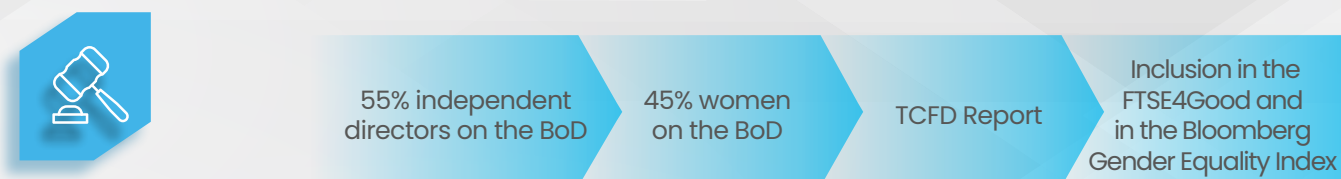
**Table 1** Table of connection between D.lgs. 254/2016, Integrated Report 2022, and references to the <IR> Framework.

SUBJECT OF LEGISLATIVE DECREE NO. 254/2016	D.lgs. 254/2016	Integrated report 2022	Content elements of <IR> Framework
		<b>Capital</b> <b>Chapter / paragraph</b>	
Relevant themes	Art. 3 paragraph 1	Company profile Sustainability for INWIT	E. Strategy and allocation of resources
Business model of management and organization	Art. 3 paragraph 1a	Company profile Competitive positioning and value creation of INWIT Governance	A. 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 All capital
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 over 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	
Reporting standard 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



## GOVERNANCE



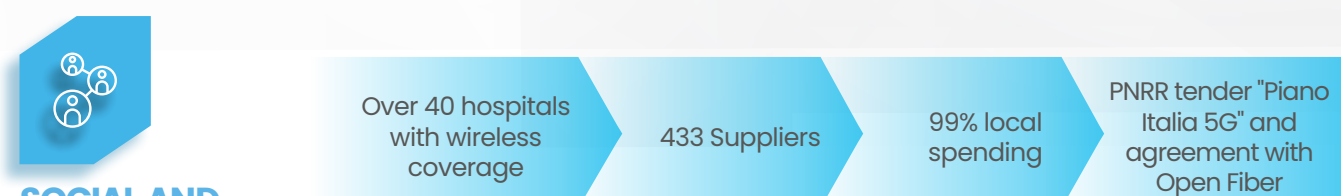
## FINANCIAL CAPITAL



## INFRASTRUCTURAL CAPITAL



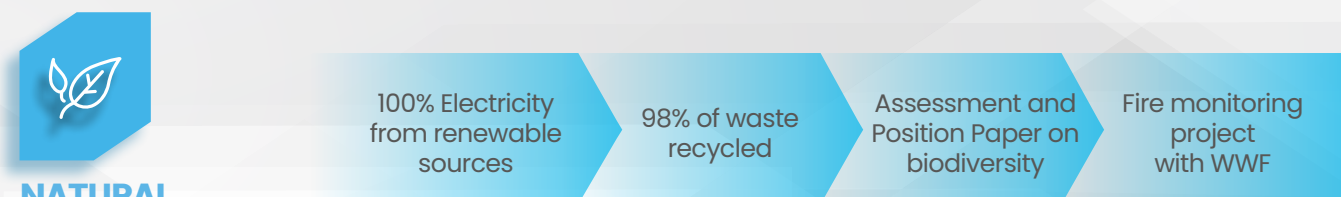
## INTELLECTUAL CAPITAL



## SOCIAL AND RELATIONSHIP CAPITAL

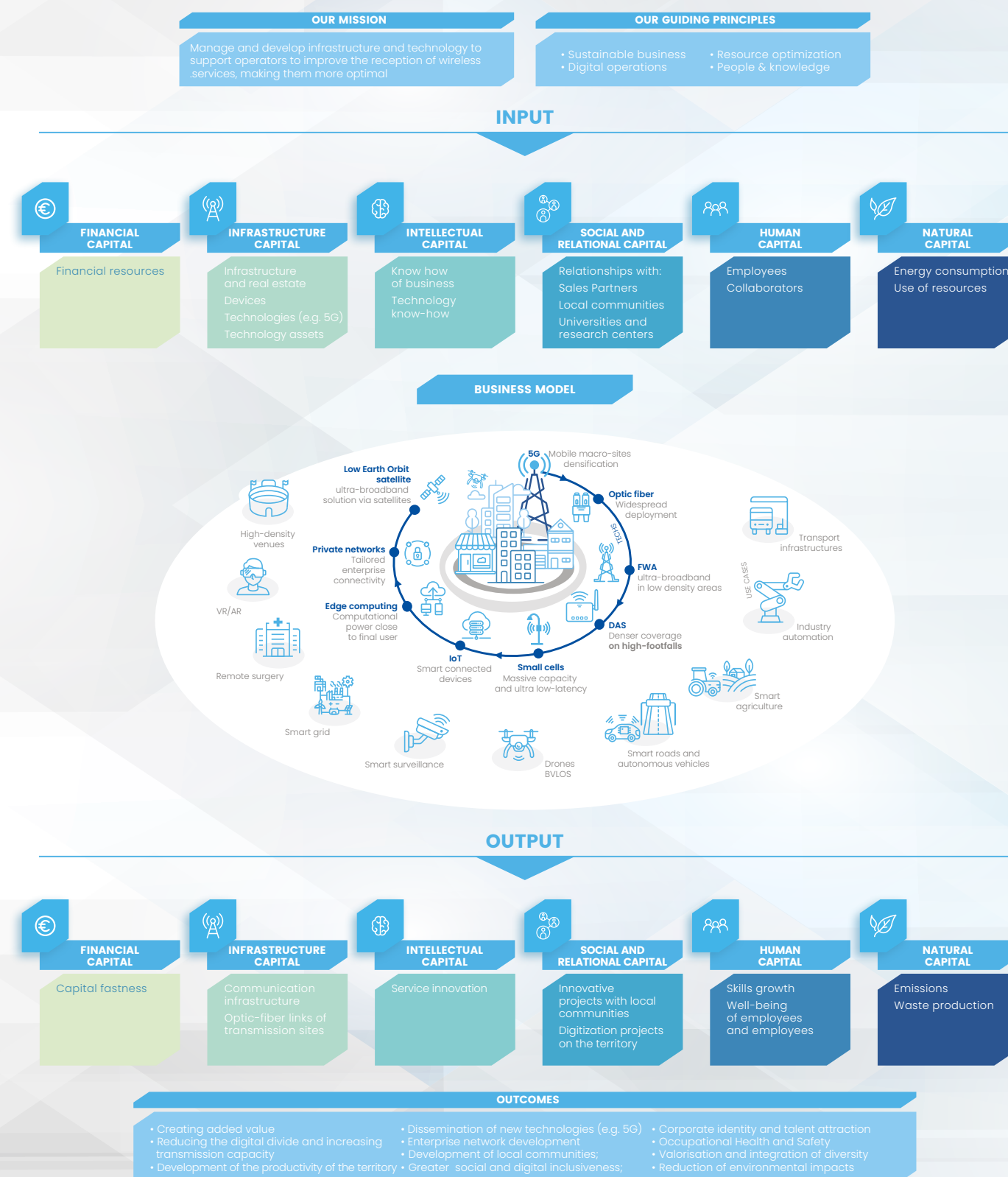


## HUMAN CAPITAL



## NATURAL CAPITAL

## INWIT'S BUSINESS MODEL AND VALUE CREATION STRATEGY





## INWIT: HISTORY, MISSION AND VALUES

GRI 2-1; 2-6 (parziale)<sup>1</sup>

Infrastrutture Wireless Italiane S.p.A. is the **largest operator within the wireless infrastructure sector in Italy** and realizes and manages technological plants and civil structures (such as towers, pylons and poles) that house the radio transmission apparatuses, mainly for the service of the telecommunication operators.

### A growing offer according to technological development.

With the goal of continuing to support wireless service optimization and driving the evolution of towers from passive infrastructure to connected, shared, distributed, and protected digital infrastructure, INWIT has expanded its offering with a number of additional services in recent years. In particular, INWIT is realizing the coverage service for mobile telephony through proprietary DAS (distributed Antenna System) systems, 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. In fact, INWIT contributes significantly to the coverage of the wireless telecommunications services of the Italian territory, increasing its sites also in the light of the development of new technologies. All this makes it an essential infrastructure for the development of telecommunications technologies, guaranteeing coverage and capillarity that can contribute in a consistent way also to overcoming the digital divide in our country. INWIT is therefore well positioned to support the ongoing digitization process and serve the growing demand for connectivity. The purpose of INWIT, **"sharing connections"**, is to briefly express the whole essence of its work.

### 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 in fact 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 have followed each other over the years. Thanks to this evolution, started 40 years ago, INWIT today 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, which was designated for the operational management, monitoring and maintenance of the group's towers and repeaters. The merger with Vodafone Towers has significantly transformed the dimensional and strategic profile of INWIT, to which was added the transaction concluded in 2021 which led to the purchase of approximately 700 radioelectric plants covering 1.000 km of road and motorway tunnels. The tunnel package includes significant sections in the national connections due to the number, conformation and need for cellular coverage in the tunnel.

### A present that consolidates the future.

The acquisition has positioned INWIT as the national player of long-term connectivity in the road segment and is 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 for safety conditions monitoring activities. Confirming INWIT's role in digitizing the country and its contribution to reducing the digital divide, an agreement was signed with Open Fiber in 2022 for the coverage of over 600 Municipalities distributed throughout the country with FWA (Fixed Wireless Access) and INWIT was awarded the public tender "Piano Italia 5G" of the

<sup>1</sup> It should be noted that the requests of GRI 2-6 are covered, for points a., b.i, in the paragraph INWIT: history, mission and values; for points b.ii, c, in the paragraph "Competitive positioning and value creation", finally for the remainder in the paragraph "Supply chain".

PNRR, through the Temporary Grouping of Companies between the agent INWIT, Tim and Vodafone Italia, aimed at covering 1,200 market failure areas.

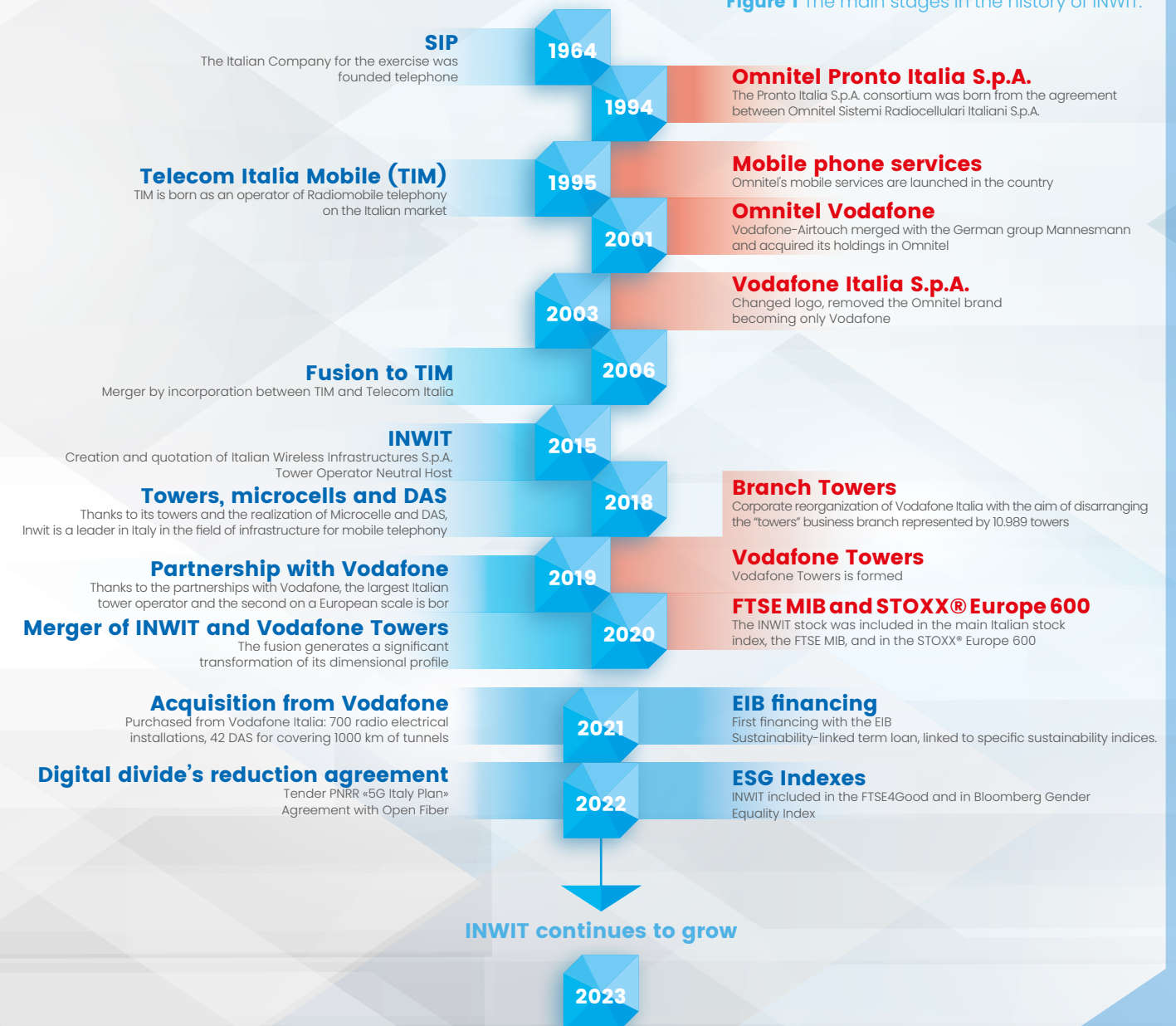
The infrastructure of INWIT today has over **23.000 managed sites**, distributed in a capillary way throughout the national territory (**one tower every about 3 km** in rural environments and one every about 5-600 m in centers with high population density), whereby the transmission apparatus of all the main national operators is hosted, and more than 6.900 remote joined small cells and DAS.

Since 2020, the INWIT title has been included in the **FTSE MIB** and **STOXX® Europe 600** and, in 2022, INWIT was first included in the ESG FTSE4Good and Bloomberg Gender Equality Index.

Following the inauguration of the new Board of Directors, appointed at the shareholders' meeting on 4th October 2022, INWIT marked a further evolution in its governance, with the presence on the board of a majority of independent directors.

On June 22, 2020 INWIT stock has been included in the FTSE MIB.

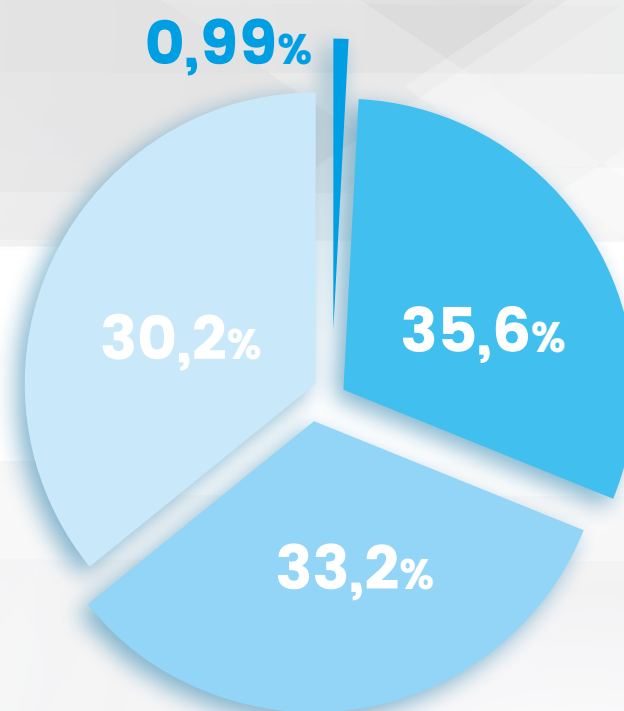
Figure 1 The main stages in the history of INWIT.





As of 31.12.2022, INWIT's shareholding structure is composed as shown below.

- DAPHNE 3 S.p.A.
- CENTRAL TOWER HOLDING COMPANY B.V.
- FREE FLOAT
- IMPULSE I SARL



It should be noted that Daphne 3 S.p.A. is a 90% subsidiary of Impulse I S.à.r.l. (In turn controlled by Impulse II S.C.A.); the remaining 10% is held by TIM S.p.A. Central Tower Holding Company B.V. is indirectly owned by Vodafone Group PLC.

Since 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, in a **logic of Tower as a service**. INWIT also continues its journey towards a true paradigm shift in the creation of a sustainable business model. Moreover, the Sustainability Plan was integrated into the Industrial Strategy, which was updated to 2026, foreseeing the development of initiatives and projects focused on the 3 areas of ESG; Environment, Social and Governance.

In accordance with the requirement of adherence to the principles of the Global Compact promoted by the United Nations Organization on human rights, working standards, environmental protection and the fight against corruption, INWIT drafted its second Communication on progress (COP) in November 2022. This confirms its desire to integrate the ten principles into the company's strategy, culture and day-to-day operations. In addition, to strengthening its commitment to inclusion and sustainability, INWIT has signed the Women's Empowerment principles promoted by A Global Compact and a Women.

#### WE SUPPORT



## VISION

### An increasingly connected and sustainable future

INWIT believes in an increasingly connected and sustainable world, in which infrastructures enable the connections of people and objects, always and everywhere, in order to generate long-term value for the community and all its stakeholders.

## PURPOSE

### Sharing connections

INWIT builds and manages shared and digital wireless infrastructures that enable operators and technologies to connect people and objects, anytime, anywhere, to benefit the communities in which it operates.

## VALUES

In 2022, in its role as “**Tower as a service**” and with a view to “**sharing connections**”, INWIT declared its new **values** to ensure an increasingly connected and sustainable future in which infrastructure enables the connections of people and objects, anytime and anywhere. in order to generate long-term value for the community and stakeholders.

### Passion for our customers



We are partner of our customers to build infrastructure and develop innovative solutions to meet their needs and enable the sharing of data, services and goods.

**Partnership – Reliability – Innovation**

### Passion for our people



We value the connections between our people, promoting their inclusion, well-being and development, so that we can all be involved and be responsible for our successes, from the point of view of ethics and integrity.

**Collaboration – Responsibility – Integration.**

### Passion for results



We work every day to improve our performance and achieve maximum results for us, our customers, our communities and all the stakeholders we work with.

**Planning – Care – Simplicity.**

### Passion for sustainability



Ours is a sustainable business that puts the environment and the community at the center. We are committed to enabling the digital transition by promoting a fairer and more inclusive society, reducing the digital divide, and fostering innovation.

**Digital – Inclusion – Environment.**

### Passion for the success replaced



Our commitment is to an increasingly connected and sustainable world. It is the passion we put every day for our customers, for our people, for results and for sustainability, that allows us to generate long-term value for the community and all our stakeholders.



## COMPETITIVE POSITIONING AND VALUE CREATION OF INWIT

GRI 2-6

In Italy, the market and technology environment are growing rapidly, as wireless technology is expanding 5G coverage and related densification needs, a key development element for wireless infrastructure. The transition to 5G network architecture has important implications for the digital infrastructure and tower sector, because, to meet the densification needs of 5G, more macro sites and “macro grids” will be needed to deliver performance. This will result in the safety and ease of use by the end user anytime, anywhere.

Within this context, the Next Generation EU, an instrument of the European Union aimed at stimulating post-pandemic recovery and development COVID-19 has been added. The National Recovery and Resilience Plan (NRR), within the framework of the Next Generation EU, devotes ample space and considerable resources to the theme of the country’s innovation in a digital key, favoring a wide cycle of investments in digitization and infrastructure.

In particular, INWIT has won the PNRR’s “Italy 5G Plan” race as a representative in RTI with TIM and Vodafone, strengthening its role as a digitizing enabler, in support of mobile operators to reduce the digital divide, with the inclusion of territories and the development of 5G.

In recent years, many statistics have shown the importance of digitalization and accelerating the country’s process in this field. Today, the digital dimension represents a necessity for businesses, citizens, and Public Administration, in the process of transformation towards more agile and flexible organisational, production and service models, both private and public.

This opens opportunities for tower operators and INWIT, which is well positioned to play a major role in the development of digital infrastructures, supporting telecommunications operators. Moreover, the role of “neutral host” allows INWIT to meet the demand of all the main players in the market, both mobile and fixed Wireless Access (FWA), a technology that, particularly shows strong growth dynamics.

INWIT is the leader in Italy with over 23.000 towers, about 50.000 hospitality and the best quality asset park. It is, in fact, 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, have invested in creating the best networks, characterized both by the quality of the locations and by the high standard of infrastructure construction. 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 value-creating set of systems, processes and knowledge to help operators rapidly and efficiently develop 5G.

### The value chain of mobile telecommunications services includes:

- ▶ spaces, owned or leased, where the infrastructure is located.
- ▶ optic fiber binding that connects the site to the operators “core network”.
- ▶ passive infrastructure consisting of poles and trellises and active with antennas belonging to the operators.
- ▶ free or licensed frequencies, owned by operators.
- ▶ connectivity services, offered by operators, reaching end users, consisting of the public, public and private companies (business customers).

INWIT has a clear position within the value chain, leveraging its assets (micro and macro grids) to provide infrastructure services to operators with a sharing model open to all mobile operators, FWA and other customers (OTMO/IOT).

INWIT’s Industrial Plan provides for a path of significant organic growth, supported by investments aimed at strengthening the company’s infrastructure, macro grid and micro grid, in order to be able to serve the operators in the best way possible and contribute to digital evolution in the market.

In particular, new sites are expected to be built and hospitality growth for Tim and Vodafone is expected to support the efficient and rapid development of 5G along with the continuous improvement of territorial coverage.

Another pillar of the industrial strategy is the rapid development of micro-covers, specifically, the distributed antenna systems DAS (distributed Antenna System) that allows the efficient management the mobile telephone signal even in very crowded areas such as stadiums, hospitals, universities, stations, museums or industrial plants. The development of DAS systems has seen a significant improvement over the last two years, thanks to the growth of the number of hospitality 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.

In line with this growth, the INWIT business is increasingly evolving towards the concept of **tower as a service**, with the possibility of offering more integrated services starting from the infrastructure, in line with one of the main business models of circular economy, that of the product as a service.

In fact, INWIT shares its assets and infrastructure, including maintenance and technology upgrades, to multiple customers who use them without ownership. Through this way, there is no need for every operator to realize 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 can offer different services to operators, through a transformation from infrastructure for radio transmission systems hospitality, to an advanced technology center, which is an integral part of the 5G ecosystem and enabler of all its innovatively used houses.

INWIT’s Industrial Plan, in fact, is advancing towards ever-increasing 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, therefore, the Industrial Plan provides for the experimentation and development of adjacent businesses. Among the most potential in the medium-term are the Internet of things (IoT) and hosting mini-data centers which are to be positioned at the base of the towers for services that need low latency.

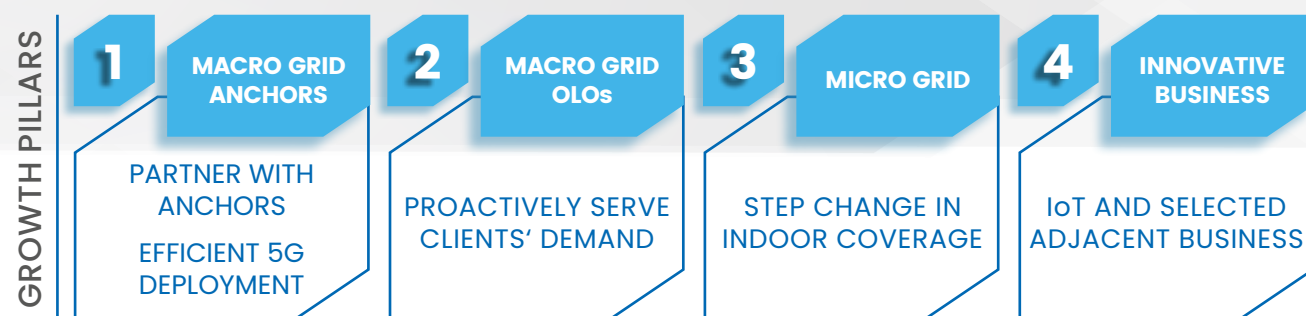
INWIT has also presented a Sustainability Plan, which fully integrates into the industrial strategy and through which it aims to make the transition toward a sustainable business model, considered an enabler for the growth of the Company.

The Board of Directors has also examined and approved INWIT’s new Business Plan for 2023-2026 (“2023 Business Plan”). Despite confirming the guidelines of the previous Business Plan unveiled in November 2020 and updated in February 2022, the 2023 Business Plan reflects the evolution of the macroeconomic, industrial and market context of recent years, which results in INWIT having an increased capacity to invest in developing its infrastructure and improving the main industrial, economic and financial targets.





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



#### Strategic pillars of the industrial plan

#### Value created for stakeholders

- 1** Strengthening partnerships, vision and industrial collaboration opportunities with *anchor tenants* to increase **the creation of shared value**
- 2** Providing services to other operators quickly and effectively
- 3** Being a frontrunner in the development of the market of DAS (Distributed Antenna Systems, indoor) e small cell (outdoor)
- 4** Investing in innovation and support new businesses

**Upgrade and expand assets in Italy.**  
A significant investment plan is envisaged, in favor of strengthening existing structures and the construction of new sites.

**Digital divide reduction.**  
Projects to cover smaller municipalities and rural areas to reduce the digital divide are planned. To this end, the strong coverage demand by FWA operators is expected to be served.

**Coverage extending to social areas.**  
The Company aims to develop and consolidate digital infrastructures, strengthening the coverage of areas with a high social and cultural vocation, such as transport, hospitals, museums, and universities.

**Innovation in a digital key.**  
On the innovation front, INWIT intends to offer hospitality to the many technologies through a tower upgrade that will look at the smart cities and the Internet of things.

## SUSTAINABILITY FOR INWIT

Since 2020, INWIT has embarked on a path toward the implementation of a modern and sustainable business, starting activities and projects aimed at integrating sustainability into the company at 360° and then creating value in the long term. 2022 was the year of recognition of INWIT's great commitment to integrating ESG practices into the company strategy and the evolution of the Sustainability Plan, including, for the first time, the **Bloomberg Gender-Equality Index (GEI)**, it has rewarded policies for an inclusive culture and equal pay, specifically. Following this inclusion is one of the leading ESG indices, **the FTSE4Good**, managed by FTSE Russell, which classifies global companies in terms of environmental, social, and governance (ESG) practices. Finally, by the international agency specializing in the assessment of infrastructure companies, **GRESB Infrastructure Public Disclosure**, which has brought the ESG rating of INWIT from D to B in just two years.

## 2022 RESULTS OF THE SUSTAINABILITY PLAN

In line with the provisions of Agenda 2030 for Sustainable Development, defined in September 2015 by the governments of the 193 UN member countries, INWIT, since 2020 has been equipped with a Sustainability Plan structured on 5 areas of Environmental, Social and Governance (ESG) commitment, medium-long-term objectives have been set for each.

In particular, through its core business, INWIT participates directly in the achievement of the UN's Agenda 2030 Sustainable Development Goals 9 and 11.



The realization of the activities aimed at achieving the objectives of the Sustainability Plan contributes to the achievement of the following additional SDGs of the United Nations Agenda.

Figure 2 SDGs included in INWIT's Sustainability Plan.



The Sustainability Plan has set concrete goals to help reduce the digital divide, mitigate climate change, and act more equitably and transparently. Below is the sustainability plan and the results achieved in 2022.





## GOVERNANCE

MEDIUM - LONG TERM OBJECTIVES	SUSTAINABLE DEVELOPMENT GOALS	ACTIVITIES	RESULTS 2022
Developing and maintaining a governance system in line with national and international best practices.	8 DECENT WORK AND ECONOMIC GROWTH	1.1 Inclusion of sustainability targets in incentive mechanism.	<b>MBO 15% and LTI 20% AD</b> and Executives with strategic responsibility. <b>ESG targets</b> for all MBO recipients.
	12 RESPONSIBLE CONSUMPTION AND PRODUCTION	2.1 Stakeholder Engagement.	<b>2° Stakeholder Forum</b> was conducted. <b>Brand awareness survey of population and stakeholders</b> was carried out. <b>Stakeholder engagement platform for monitoring and reporting</b> was implemented.
	13 CLIMATE ACTION	2.2 Inclusion of INWIT in ESG sustainability ratings/indices.	<b>CDP: Score B +5 Upgrade:</b> <b>FTSE Russell:</b> 2,9 to 3,5 (scale 1-5). <b>GRESB:</b> 53 to 70 (scale 1-100). <b>S&amp;P CSA:</b> 48 to 55 (scale 1-100). <b>Vigeo:</b> 38 to 44 (scale 1-100). <b>Bloomberg GEI:</b> from 73.68 to 75.53 (on scale 1-100). Inclusion in <b>FTSE4Good</b> .
	16 PEACE, JUSTICE AND STRONG INSTITUTIONS	3.1 Creating awareness on ESG themes on the supply chain.	Questionnaire completed by <b>127 suppliers</b> , <b>66% of 2021 expense</b> .



## PEOPLE

MEDIUM - LONG TERM OBJECTIVES	SUSTAINABLE DEVELOPMENT GOALS	ACTIVITIES	RESULTS 2022
Fostering the involvement, well-being and development of our people.	4 QUALITY EDUCATION	4.1 Ensuring employee participation in training and skill development initiatives.	<b>99% employees involved</b> • 4.902 hours delivered. • <b>19,1 hours per capita.</b>
	5 GENDER EQUALITY	5.1 Carrying out an internal climate analysis.	Communicating results to employees with: • Areas of strength and areas of improvement. • Main <b>Action Plan:</b> Meetings on the territories with the Top Management, Assessment and Development paths, Focus Group Constitution. INWIT included in the index.
	8 DECENT WORK AND ECONOMIC GROWTH	5.2 Business HR Awards.	<b>256 employees</b> Of which <b>Women: 98 (38,3%)</b> .
Ensuring high safety standards along the value chain.	3 GOOD HEALTH AND WELL-BEING	6.1 Identifying corporate priorities and policies on the D&I theme.	Diversity <b>Ambassador profile found</b> .
		6.2 ISO 30415 HR - D&I.	<b>Integration of the Health and Safety and Environment Management System with Quality (ISO 9001)</b> completed. Delivered training on the SSL system audited internally and no critical issues were found. <b>0 serious injury.</b>
		7.1 ISO 45001 Health and safety at Work.	
		7.2 Reduction of accident indices.	







## ENVIRONMENT

MEDIUM - LONG TERM OBJECTIVES	SUSTAINABLE DEVELOPMENT GOALS	ACTIVITIES	RESULTS 2022
Achieving the Carbon Neutrality by 2024.	13 CLIMATE ACTION	8.1 Definition of a Climate strategy.	Target <b>approved</b> and published on <b>SBTI site</b> .
		8.2 ISO 50001 certification	Established Energy Team. Delivered training on the subject. <b>Stage 1</b> of the certification process of the Energy Management System has been successfully completed.
		8.3 Development of renewable sources.	<b>102 plants</b> have been installed for a total power of <b>405 kW, equivalent to 131 tCO2 avoided</b> .
		8.4 Energy efficiency initiatives.	The following plants have been installed. • <b>Free Cooling:</b> 670 target. • <b>He Rectifiers:</b> 1.285 target.  Equivalent to <b>9,5 GWh saving regime</b> and <b>2.545 tCO2 avoided</b> .
Ridurre l'impronta ambientale con un approccio di economia circolare.	8 DECENT WORK AND ECONOMIC GROWTH	8.5 Purchase green energy.	<b>100% green energy through guarantees of origin</b> have been purchased.
		9.1 ISO 14001 certification.	<b>Integration of the health and safety and environment management system with quality (ISO 9001)</b> was completed. Delivered training. Completed 231 audit and environmental compliance on environmental system on request by Supervisory Body.
		9.2 Initiatives to increase the life cycle of materials and products	3 scrapping activities totaling 931 tons with a recovery of <b>98,3%</b> .  <b>159 kits installed</b> as a replacement for lead acid batteries.  <b>600 energy stations</b> installed.
		9.3 Conducting a life cycle analysis of different model sites.	Carried out <b>LCA study</b> of <b>RAW-LAND</b> and <b>ROOFTOP</b> model sites.
	12 RESPONSIBLE CONSUMPTION AND PRODUCTION	9.4 Conducting an assessment of the impacts of macro sites on biodiversity.	<b>Biodiversity paper</b> with <b>assessment on impacts</b> of INWIT was conducted. <b>Biodiversity monitoring</b> projects started.



## INNOVATION

MEDIUM - LONG TERM OBJECTIVES	SUSTAINABLE DEVELOPMENT GOALS	ACTIVITIES	RESULTS 2022
Being an actor to support operators in the digitization of the country.	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	10.1 Increasing and strengthening micro-coverage.	<b>56 DAS</b> dedicated coverage projects.
		10.2 Tower upgrade (smart cities, drones, IoT etc...).	<b>Wiseair</b> Torino: Installation on 7 sites. <b>Pugliese</b> aqueduct: Hosting for metering. <b>SINELEC:</b> Motorway monitoring with drones. <b>WWF:</b> Biodiversity monitoring <b>Nplus/Olivetti:</b> Structural monitoring of sites.
		10.3 Developing a customer satisfaction system.	Identified two KPIs: Net Promoter score (NPS) and overall Satisfaction (OS). Carried out second survey campaign with <b>NPS = 20 and OS = 8</b> .
	11 SUSTAINABLE CITIES AND COMMUNITIES	11 Collaborations for the development of technological innovation (e.g. Start up/ Universities / Companies / Research Institutes...).	<b>Politecnico di Torino: Predictive maintenance</b> + Automatic BIM modeling <b>Milan Polytechnic:</b> Connected car mobility + 5G Observatory. <b>University of Salerno: Project Fuel cells Telebit started: 2nd step phase</b> Change material.



## COMMUNITY

MEDIUM - LONG TERM OBJECTIVES	SUSTAINABLE DEVELOPMENT GOALS	ACTIVITIES	RESULTS 2022
Contributing to the reduction of the digital divide and the social, cultural and economic development of the community.	11 SUSTAINABLE CITIES AND COMMUNITIES	12.1 Promoting projects to reduce the digital divide.	<b>427</b> hospitalities signed. Open Fiber agreement. PNRR's 5G tender awarded in RTI with TIM and Vodafone Italia.
		12.2 Activating projects covering areas with a high social and cultural vocation (museums, hospitals.)	<b>13 hospitals.</b> <b>2 museums.</b>

The Board of Directors of 2 March 2023 approved the 2026 update of the Sustainability Plan, in line with the new Business Plan, of which the Sustainability Plan is an integral part, to make the most of the development opportunities towards the pursuit of sustainable success. The updated plan will be described from the next Non-Financial Statement.





## MATERIALITY ANALYSIS: NEW APPROACH

GRI 3-1; 3-2

In line with the provisions of Legislative Decree 254/2016 and with the methodologies and principles reported by the new edition of the GRI standards published in 2021 by the global reporting initiative, INWIT has updated Materiality's analysis for the reporting of non-financial information 2022, identifying the material issues that reflect economic impacts, Significant environmental and social aspects of the Company and which substantially influence the assessments and decisions of its stakeholders.

The concept of Materiality is, in fact, closely linked to the concept of impact: Material themes are those that represent the most significant impacts of the organization in the economy, the environment and people, including impacts on human rights.

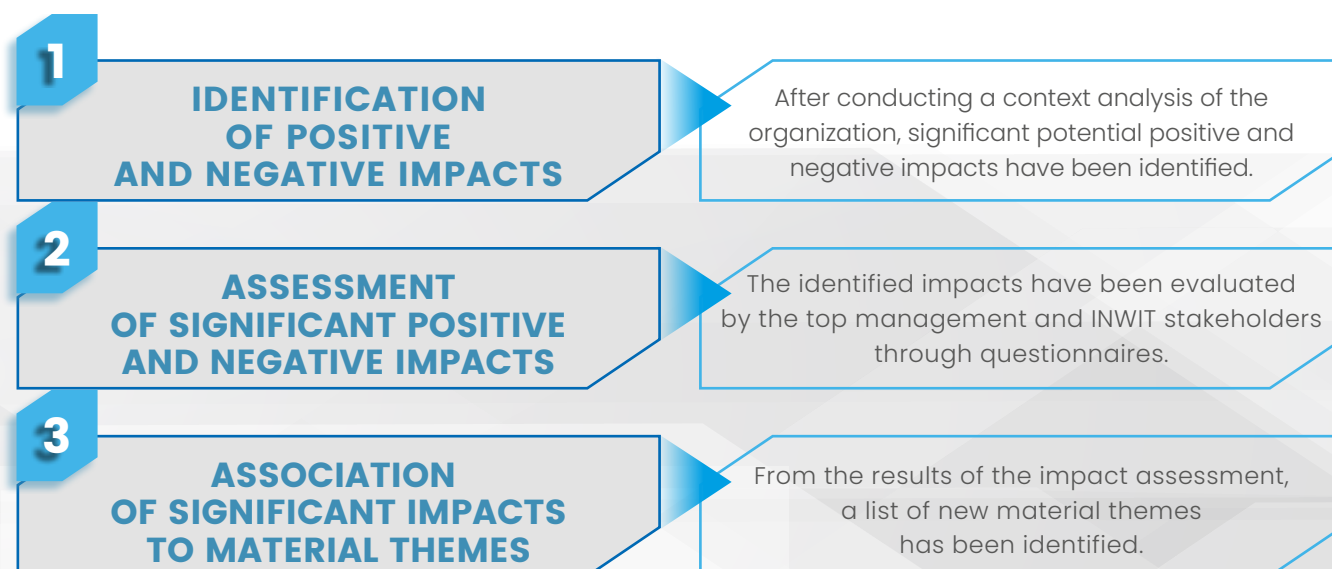
The update of the Materiality analysis was carried out based on a **context analysis**, through which the aspects potentially relevant to INWIT were identified in view of the material themes identified in previous years; the activities carried out, the business relations, the sustainability context in which it operates and the expectations of its stakeholders. This first analysis has allowed us to identify **the positive and negative, current, and potential impacts that could be significant for INWIT and its stakeholders**.

The identified impacts, reconciled with the company's Enterprise risk Management, were submitted to an **evaluation process** aimed at identifying the priority between negative impacts and the priority among positive impact.

In detail, the identified impacts have been evaluated, through the realization of surveys aimed at:

- Top Management, which has been asked to evaluate impacts by considering their impact size and severity.
- INWIT internal and external stakeholders, who were asked to prioritize impacts based on significance.

**Figure 3** Key stages for the assessment of positive and negative impacts and the association of material themes.



The elaboration of the results allowed to associate a coefficient of significance to each impact and – based on this coefficient – to prioritize the negative and positive impacts, subsequently reconciled with **the material themes 2022 of INWIT**.

Analysis of the results revealed the importance of the issues related to business efficiency and resilience, and the theme **“Governance of sustainability, resilience and business efficiency”** was introduced. The following are the prioritized lists of positive and negative impacts and their associated themes (in alphabetical order).

### NEGATIVE IMPACTS

Inefficiencies and operational criticalities

Conflicts of interest and corruption

Cyber attacks and cyber fraud

Changes in ecosystems and biodiversity

Poor efficiency and unreliability of the service offered

Privacy violation

Cases of discrimination/abuse

Increased energy consumption and carbon footprint

Non-compliance Health and Safety and Environment regulations

Accidents and occupational diseases

Failure to adapt to new technologies

Negative perception of business impacts

Violation of human rights throughout the value chain

Depletion of material resources and incorrect disposal of waste

High turnover

### MATERIAL TOPICS 2022

Combating climate change

Cyber security and Privacy

Diversity and inclusiveness in the workplace

Circular economy

Efficiency and reduction of energy consumption

Ethics, anti-corruption, and business integrity

Sustainability governance, business resilience and efficiency

Impacts on the territory and the community

Innovation and digitization

Quality and inclusiveness of the service

Health and safety at work

Supply chain sustainability

Employee development and enhancement

Protection of biodiversity

High turnover

### POSITIVE IMPACTS

Strategic positioning on sustainability

Competitive and reputational advantages

Reduction of the digital divide

Strengthening the control of non-financial risks

Awareness of ethics and human rights

Energy efficiency

Business well-being

Contribution to market expansion

Safe workplace for the employee

Transition to a circular economy model

Reduction of ESG impacts in the supply chain

Reduction of customer disservice

Upskilling and Reskilling of the company population

Business resilience vs. climate change

Monitoring to protect biodiversity

In general, the material themes on which the contents of this Non-Financial Declaration are concentrated 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 2-29

With the Stakeholder engagement Management Policy, approved in 2021 by the Board of Directors, INWIT has provided a tool that allows a better and transparent management of relations with all its stakeholders, illustrated in the image below.

Figure 4 Stakeholder Mapping.



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 continues the 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 Corporate Governance Code. The Code supports "sustainable success" in the creation of long-term value for the benefit of shareholders, considering the interests of other stakeholders relevant to the Company and provides that it is the administrative body that promotes, in the most appropriate forms, dialog with these stakeholders.

## STAKEHOLDER FORUM 2022

On May 3, 2022, INWIT organized its **2° Stakeholder Forum**, an opportunity to share with its stakeholders the progress in the sustainability of society.

During the day, the participants were given ideas for reflection on the challenges of sustainability in the so-called "decade of Action", which was initiated in early 2020 by the United Nations and was considered to be the decisive decade for achieving the Agenda 2030 Sustainable Development Goals, which include, inter alia, the fight against climate change and gender equality. The event ended with an invitation to the stakeholders, representative of the different mapped categories, to participate in a survey on the level of knowledge of the Sustainability Plan and their perception of INWIT's commitment to make it known.

## BRAND AWARENESS SURVEY

During 2022, INWIT carried out a market survey to verify brand awareness of its role, with reference to two specific targets: Stakeholders and population. The research was carried out with the support of the Piepoli Institute, through conducting 1500 interviews with a representative sample<sup>2</sup> of the Italian population and 120 interviews with a sample of stakeholders.

During the interviews, various types of questions were asked to investigate the opinion of stakeholders and the population regarding:

- ▶ The theme of technological innovation and digitization in relation to the concept of sustainability.
- ▶ 5G opinions: Knowledge, opportunities and risks.
- ▶ The impact of bureaucracy on the development of telecommunications networks.
- ▶ Knowledge and perception of INWIT and the services offered (hosting and indoor/outdoor coverage).
- ▶ INWIT's role in the country's sustainable development and growth

In the perception of Italians, the concept of sustainability is strongly associated with the themes of digital innovation and telecommunications infrastructure. The digitization of the country and the strengthening of infrastructure networks are considered fundamental aspects for the sustainable growth of the country and the greatest perceived advantages are linked both to the environmental aspects, with the territorial monitoring and dematerialization of processes, and to the social aspects, by promoting social equality and equal opportunities and reducing the digital divide. The attitude toward 5G is more than positive, but both the population and stakeholders consider it necessary to raise awareness about 5G, informing them about its benefits and the absence of risks, especially for health.

Most of the respondents consider INWIT's role in sustainable development and growth to be important, with a particular focus on environmental aspects. In particular, the stakeholders evaluate in an extremely positive way the path taken by INWIT with the evolution towards the concept of "tower as a service", despite bureaucratic constraints which still exist today and they represent a brake on the development and innovation of Italy.

## STAKEHOLDER ENGAGEMENT PLATFORM

In 2022, INWIT provided a new platform of stakeholder engagement, as an operational tool for managing relations with its stakeholders. The platform was used, for the first time, to submit to the stakeholders the survey for the evaluation of INWIT material themes.



<sup>2</sup> In terms of gender, age range and geographical origin.



## STRUCTURE OF GOVERNANCE AND COMPOSITION OF GOVERNING BODIES

GRI 2-9, 2-10, 2-11, 2-12, 2-13, 2-14, 2-15, 2-16, 2-17, 2-18, 2-23, 2-24

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 Italian Stock Exchange Code<sup>3</sup>, **the Anti-Corruption Policy, the principles of self-regulation and the rules governing the functioning of the social bodies**<sup>4</sup>.

Last year, the Company completed the process of adapting corporate governance documents to the Code of Corporate Governance ("C"), to the national legislation transposing the EU Directive 2017/828 (so-called stakeholders Rights II) and to the Consob Regulation on transactions with Related parties updated in December 2020. Extensive information was provided in the Report on Corporate Governance and Ownership for the year 2021.

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, in accordance with Articles 2380 and ss. Of the Civil Code, it adapts to national and international best practices in this field and is organized as follows.

The **Board of Directors**, (hereinafter "Board of Directors"), appointed on the 4th of October, 2022, consists of 11 directors, of which 5 women and 6 men, 7 over the age of 50 and 4 between 30 and 50. Six are in possession of the independence requirements of the TUF, 5 of which also under the Code, and 3 of which have been appointed from the list presented by a group of savings management companies and international investors; 11 directors are non-executive. The Board of Directors will remain in office until the Shareholders' Meeting of approval of the financial statements for the financial year 2024.

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.

The procedure for appointing the Board of Directors is in accordance with Article 13 of the Company Statute, is based on the criteria set out in Article 3 of the Code of Corporate Governance and principles of Self-Regulatory Affairs, as well as the independence criteria approved by the Board of Directors.

The directors play their role in the collegiality of the Board of Directors, or in the committees in which the Board of Directors is organized. Any exceptional requests for data, documents and news formulated

<sup>3</sup> INWIT adheres to the Corporate Governance Code drawn up by the Corporate Governance Committee of Borsa Italiana, in the current edition of time and time.

<sup>4</sup> The INWIT Anti-Corruption Policy was approved by the Board of Directors on December 16, 2021.

outside the collegial moments are addressed to the Chairman of the Board of Directors, who ensures the response with the most suitable modalities to ensure the functionality of the instructor and informative processes.

The role of the Board Chair does not coincide with the function of the Company's key manager, but rather as a non-executive advisor to whom legal representation and institutional relations have been assigned, as well as the management of the relationship on behalf of the Board with the Head of the Audit Function.

**Table 1** Percentage of Board of Directors by gender and age group at 31 December 2022 (GRI 405-1).

Composition of the Board of Directors by age group								
Number of people	to 31 december 2021				to 31 december 2022			
	30>	30-50 anni	anni 50<	Totale	anni 30>	30-50 anni	anni 50<	Totale
Men	years	30-50	38%	54%	-	27%	27%	55%
Women	years	50<	31%	46%	-	9%	36%	45%
<b>Total</b>	<b>years</b>	<b>Total</b>	<b>30&gt;</b>	<b>100%</b>	<b>-</b>	<b>36%</b>	<b>44%</b>	<b>100%</b>

In addition, the Board of Directors is responsible for verifying the effectiveness of the processes aimed at identifying and managing the impact of INWIT on the economy, environment, and people, as in the case of Enterprise risk Management (ERM), updated annually.

Regarding the delegation of responsibility for managing INWIT's impacts on the environment, people, and the economy, there are no managers or other designated employees who have such delegated authority. However, it can be said that they report the ways in which impacts are managed to the highest governing body at least annually, by means of updating the Integrated Report. In fact, the Board of Directors is responsible for approving this document annually.

For what concerns the evaluation of the Board's performance in the supervision of the management of impacts on the economy, environment and people, there are no specific evaluation processes in INWIT, however, the Board of Directors carries out an annual "self board evaluation", also with the support of an external advisor.

Furthermore, it should be noted that, in 2022, no conflicts of interest occurred, and no critical issues were detected, i.e. concerns arising through the complaint mechanisms, connected to potential and real negative impacts of INWIT on stakeholders, reported to the Board of Directors.

The Board of Directors has approved a series of initiatives and measures aimed at expanding knowledge on sustainable development, as well as realizing INWIT's active commitment to the subject, such as Strategy Day and formalization of the Sustainability Plan.

A **Compensation and Nomination Committee** (which in itself combines tasks and responsibilities assigned by the Corporate Governance Code to the appointments and remuneration committee), **a Sustainability Committee, a risk and Control Committee and a Related parties Committee have been set up within the Board**. The functions of which are described in the Company's Self-discipline principles (published in [www.INWIT.it](http://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 has provided itself with its own e-mail address for the procedure governing the reception, preservation and processing of reports, and complaints, also by employees and in anonymous form pursuant to art. 2408 dc.

The College also receives whistleblowing reports in accordance with the appropriate company procedure, published on the website. 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:** Consists of the Board of Directors and consists of 5 non-executive directors, of which 3 are independent; Members of the supervisory body may attend meetings of the Committee. The Committee shall carry out the tasks and responsibilities assigned by the Code of Corporate Governance to the nomination committee and the remuneration committee, and shall also:

- ▶ formulate proposals to the Board of Directors 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.
- ▶ defines the procedures and times for carrying out the annual evaluation of the Board of Directors.
- ▶ proposes the criteria for fixing the annual total compensation established by the Assembly for the entire Council.
- ▶ makes proposals for *stock option* plans and top management remuneration.
- ▶ 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 the Chief Executive Officer to management, giving timely notice to the Chairman of the Board of Directors.

**Sustainability Committee:** Set up by the Board of Directors on 23 April 2020, it is composed of 3 non-executive directors, of which 1 is independent; members of the supervisory body can 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 area;
- ▶ makes proposals to the Board of Directors on sustainability strategies and sustainability plan (the "Plan"), monitoring their implementation on the basis of the objectives set out in the Plan and evaluating its 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 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.

**Control and risk Committee:** It consists of the Board of Directors and is composed of 5 non-executive directors, of which 4 are independent. The members of the supervisory body may attend meetings of the Committee and, where appropriate, in relation to the issues to be dealt with, the Committee and the Board of Statutory Auditors shall meet jointly. The Committee is a body with advisory and proactive functions, which has, among other things, the task of supporting the Board of Directors' assessments and decisions relating to 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:

- ▶ It monitors compliance with corporate governance rules, as well as the evolution of the regulations and best practices in this area, also for the purpose of proposing to update the Company's internal rules and practices
- ▶ shall instruct the financial and non-financial communication of the period, with a view to 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 the Chief Executive Officer to management, giving timely notice to the Chairman of the Board of Directors.

**Related parties Committee:** Formed by the Board of Directors on April 23 2020 and composed of 3 independent directors and carries out the tasks and responsibilities assigned by the procedure for transactions with Related parties and by the CONSOB Regulation.

The procedure for the appointment of committees follows the provisions of the Code of Corporate Governance and principles of Self-Regulatory Affairs approved by the Board of Directors.

**Supervisory body:** (hereinafter "OVV"): as from 5 May 2020, it carries out the functions referred to in Legislative Decree no. 231/2001. Composed of 4 components, the body has the task of "*supervising the functioning and the observance of the organizational model and of taking care of its updating*", as foreseen by art. 6 of Legislative Decree 231/01. The tasks assigned to the SB require that the latter be provided with autonomous powers of initiative and control and, therefore, it should be noted that the body has the following characteristics:

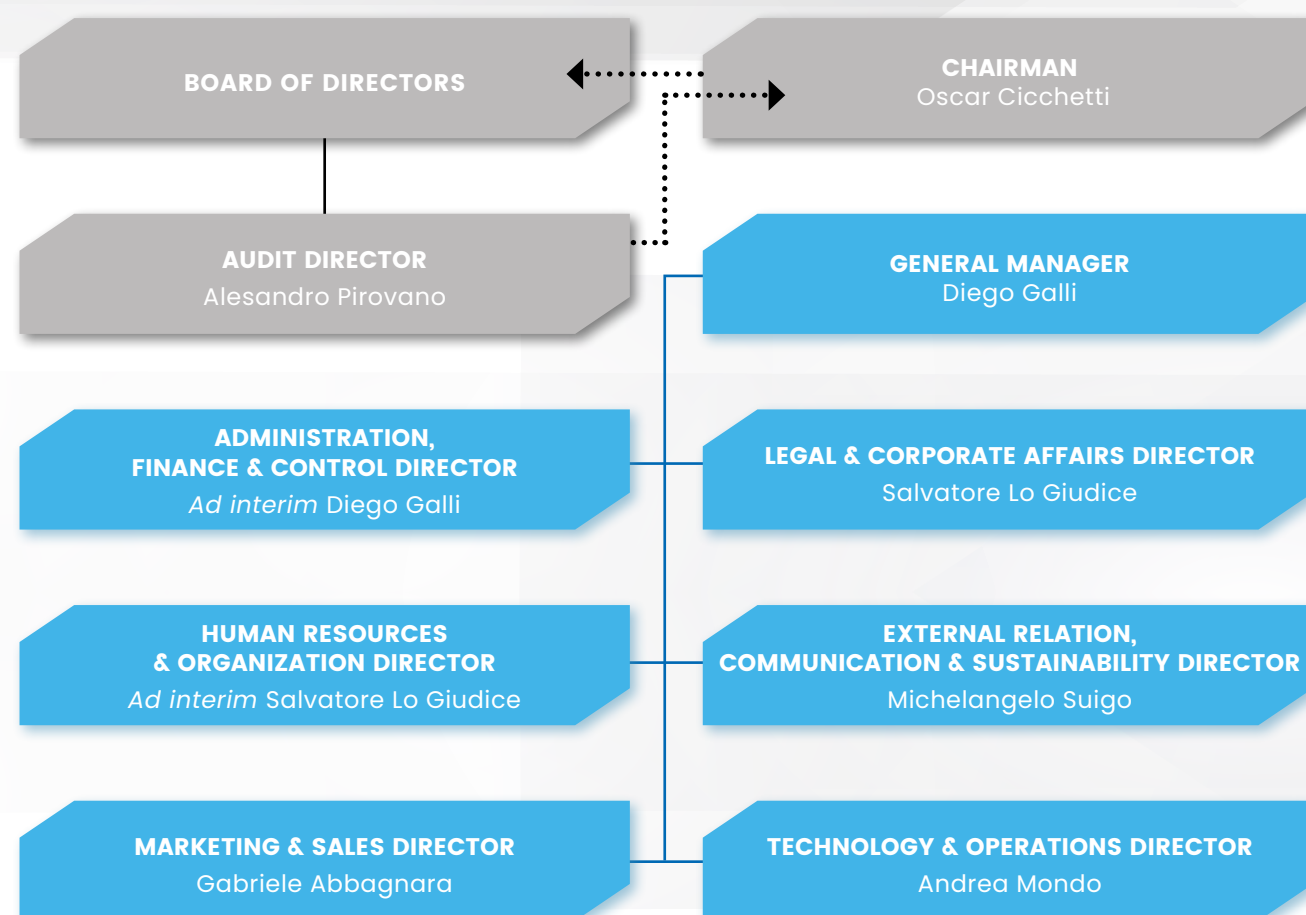
- ▶ The unreliability of the choice of the supervisory body by the institutions of the supervisory body, otherwise the essential requirement of autonomy may be waived.
- ▶ The position of independence of the members making up the supervisory body, a position to be reserved for those who are reliable on the basis of the professionalism demonstrated and the personal skills recognized by them.

By using the Audit and Compliance functions, the ODV 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.
- ▶ 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 organized organizational models.

In order to define the way in which INWIT assigns the various responsibilities, with the aim of guaranteeing the implementation of the declared commitments, the corporate macro-organizational structure, resulting from 31 December 2022, is presented below. In addition, in the Executive Governance Notice, corporate governance bodies are defined with the task of ensuring transparency and coordinating and supporting the execution of business plans and projects in a coherent and effective manner. These bodies oversee the various business activities to implement the commitments made by INWIT.

Figure 5 2022 Macro Organizational Structure.\*



INWIT includes commitments in strategies, policies and operating procedures through the Sustainability Plan, integrated within the Industrial Plan, and the various targets for management systems ISO 37001, ISO 45001, ISO 14001, ISO 50001 and through company procedures.

Through the Code of Ethics and using specific contractual clauses, INWIT maintains its commitments with and through the entities with which it establishes business relations. In addition, he signs a specific document for the management of the process of purchase of goods and services, disregarding the general scheme, going to define in a detailed and precise way all the responsibilities of the functions involved.

In order to meet the commitments given, INWIT also provides a number of training courses, including ESG, health and safety, energy, environmental and anti-corruption training courses, as described in human capital. Policy commitments are communicated differently depending on the categories to which they are addressed: To the employees through specific internal communication by e-mail, to the suppliers through the contractual clauses defined by the document of Management of the process of acquisition of goods, cited above, and, in general, to all the subjects through the publication on the website of all the company policies approved by the BoD.

\* for the updated organizational structure, please refer to the following link <https://www.inwit.it/en/company/leadership-team/>

## CODE OF ETHICS

The **Code of Ethics**, identified as the founding component of the organizational model and the Company's Internal control and risk management system, is positioned upstream of the entire corporate governance system, and represents the INWIT Charter of values, founding, in programmatic terms, the set of principles that are inspired by the actions of the members of the social bodies, management, business partners, as well as internal and external collaborators.

The Code of Ethics therefore constitutes a tool through which INWIT directs its business activities for a business conduct based on the following values and principles: Ethics and compliance, health and safety, human resources, community, communication, competition, and service excellence.

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 case of reports on the correctness of the behavior.

The Code is periodically subject to review and eventual updating by the Board of Directors of INWIT. On March 2, 2023, the Board of Directors approved the update of the Code of Ethics, available on the website at the following link.

## 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 an Organizational Model of Management and Control according to Legislative Decree 231/01 ("Model 231"). More specifically, the 231 model is the result of an accurate analysis of the business processes at risk of the crimes foreseen by the Decree, which can be identified in the areas of activity, with the involvement of the competent company structures.

### The company promotes training initiatives for the benefit of the entire company population on ex D.Lgs. 231/01 themes, in detail:

- ▶ targeted training, specifically aimed at updating and developing D. 231/01 of the company roles most involved in sensitive activities under the Model 231 and the Anti-Corruption Policy.
- ▶ widespread training aimed at the entire company population.
- ▶ insertion training for new hires.

During 2022, information sessions were conducted for the corporate population on Compliance & Business Ethics with a focus also on liability ex Legislative Decree. 231/01 and related predicate and whistleblowing offenses.



These initiatives are designed and implemented by the risk & Compliance function with the organizational support and coordination of Human Resources.

Following its establishment, INWIT adopted Model 231 of the Telecom Italia Group. In May 15, 2019, the Board of Directors of the Company approved its own 231 model, which was last updated on June 14, 2022 in order to transpose the organizational and regulatory changes that occurred *during the medium time period*.

#### The Organizational Model ex Legislative Decree 231/01 is divided into:

##### ► Code of Ethics.

► **General part:** Containing a brief description of the Company, the contents and aims of the 231 model and the methodology used for its implementation, the functions of the ODV and the *adopted whistleblowing system*. In the general part, initiatives for the dissemination and knowledge of the 231 model and the disciplinary system are also mentioned.

► **Special Parts:** Each Special part identifies a risk process in which sensitive areas and underlying offenses are identified. In addition, control standards are listed, divided into general principles of behavior and specific control principles.

► **List of offenses:** Containing the total list of the underlying offenses provided for in Legislative Decree 231/01.

► **List of business processes:** Containing the reconciliation of sensitive processes ex Legislative Decree. 231/01 with corporate macro-processes.

► **Risk Assessment:** Mapping sensitive processes and activities, associated predicate offenses and inherent and residual risk assessment.

It should be noted that no significant sanctions were received during 2022<sup>5</sup> for non-compliance with social and environmental laws and regulations.

Furthermore, INWIT States that it did not cause potential or actual negative impacts during 2022, such that its stakeholders did not express concerns about this through complaint mechanisms.

## REMUNERATION

GRI 2-19, 2-20

#### The Remuneration Policy is defined in a transparent way through a process involving:

- Shareholders' Meeting, in the phase of approval of the remuneration policy and the remuneration paid
- The Board of Directors, for the definition, on a proposal from the Committee on Appointments and Remuneration, of the remuneration policy of executive directors and managers with strategic responsibilities (including DG)
- The appointment and Remuneration Committee, for Presentation to the Board of proposals on remuneration policy and the determination of performance objectives for variable remuneration.

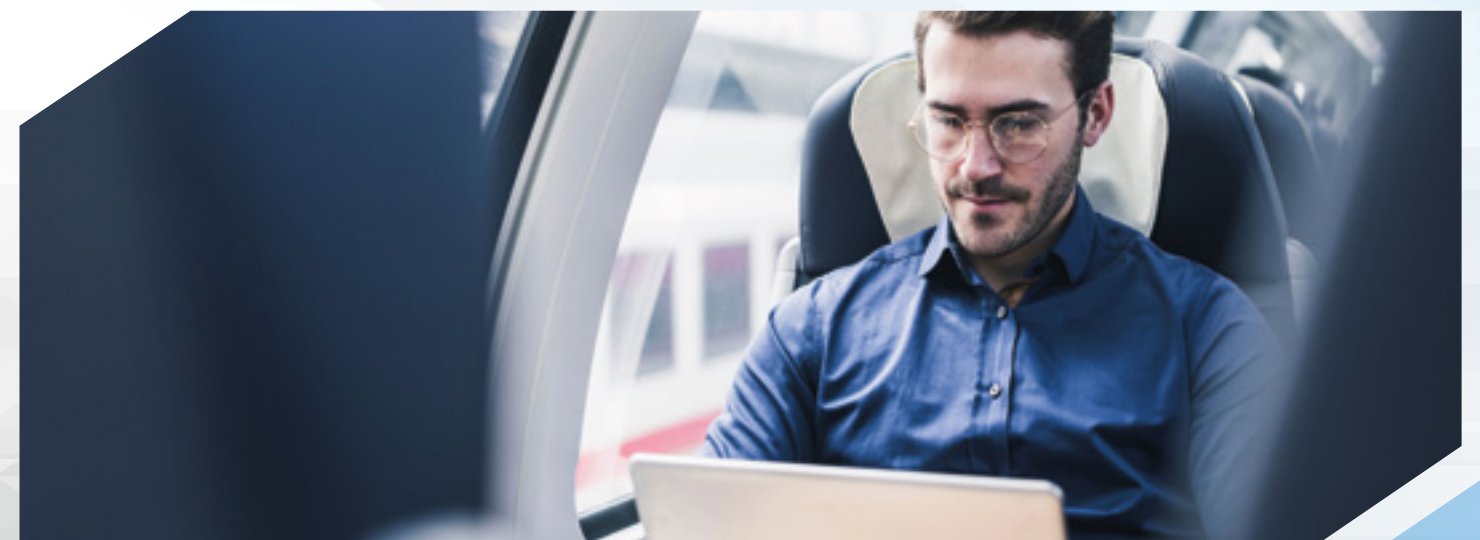
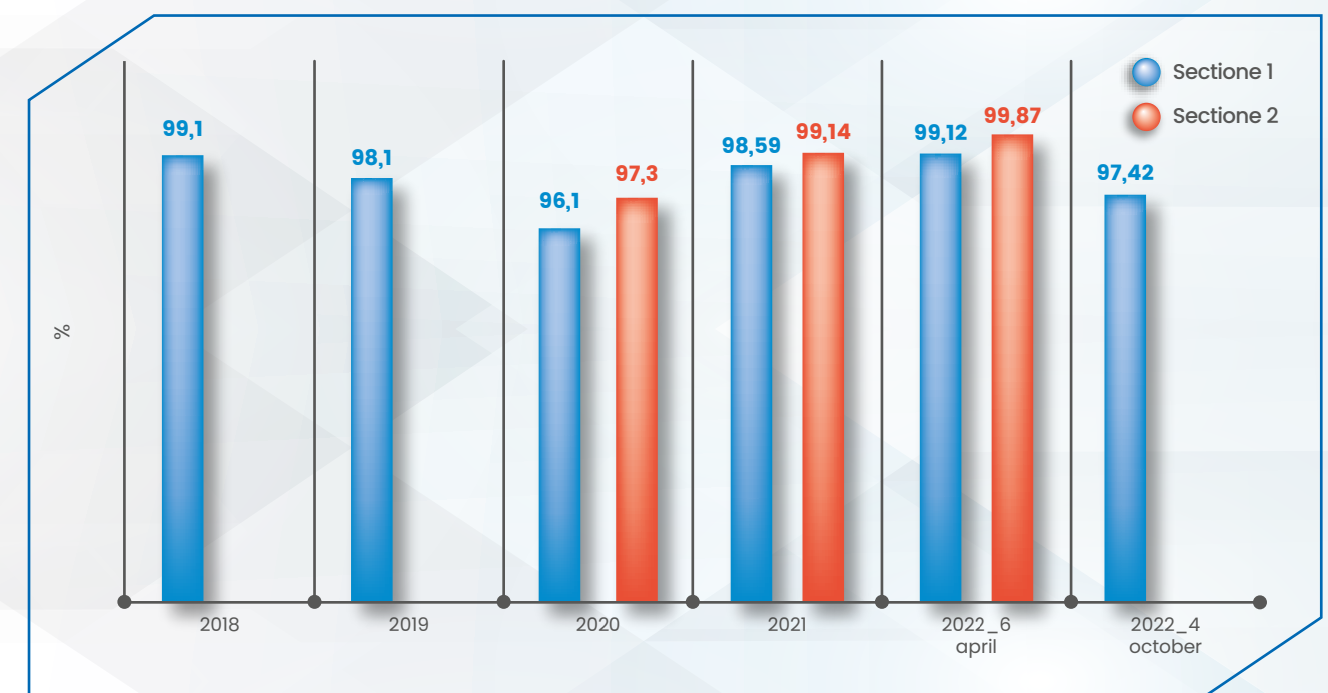
<sup>5</sup>For the INWIT analysis, it has defined a significance threshold of 10.000€.

After the 2021 Shareholders' Meeting, INWIT has started a process of engagement of shareholders, through a structured process aimed at collecting and deepening the issues of interest by shareholders and proxy advisors in remuneration.

A remuneration benchmark was established for the definition of the remuneration policy of the Director-General. Following further analysis and analysis, the proposed total compensation (fixed remuneration and variable short- and long-term remuneration) is below the average values of the reference market. For further data and information regarding remuneration policies, please refer to the documents listed in the Remuneration section of the website <https://www.inwit.it/it/governance/sistema-di-governance/remunerazione/>.

The results of stakeholder votes (including shareholders) on remuneration policies and proposals are shown in the following graph.

Figure 6 Favorable actions.



## THE RISK MANAGEMENT SYSTEM (ERM)

In compliance with **the principles and criteria** of the Italian Stock Exchange Self-Regulatory Code, INWIT has adopted a system of Internal control and risk management, defined on the basis of reference best practices, 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 provisions of the Code of Ethics and the Company's self-discipline principles approved by the Board of Directors.

It is an integral part of the overall organizational structure of the Company and includes a plurality of actors acting in a coordinated manner according to the responsibilities of the management and strategic supervision of the Board of Directors, of the management and management of the General Manager and of the management, respectively, Monitoring and supporting the Board of Directors of the Control and risk Committee and the Head of the Internal auditors function, of the Board of Statutory Auditors' supervision.

The Board of Directors is responsible for **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 reference best practices, 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 accordance with the Code of Ethics and the Company's self-discipline principles approved by the Board of Directors.

In this regard, the Company has adopted a dedicated Enterprise Risk Management Framework (hereinafter ERM), with the aim of identifying and evaluating potential events whose occurrence may influence the achievement of the main business objectives defined within the Strategic Plan.

The INWIT ERM framework is part of a cyclical process – carried out annually – that starts with risk identification, intended as identification of the list of risks that could impact on the Company in terms of achieving the objectives and/or development of 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 cyclically intercept any emerging risks or intercept evolutions on the impact of existing risks.

Furthermore, the risk universe integrates material themes that are significant to society in accordance with Legislative Decree 254/2016.

### These risks are subject to a risk Evaluation:

- ▶ Risk assessment at an 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 inherent risk level. The probability of occurrence of risks is assessed both because of the frequency with which the risk has historically occurred and on the probability that the risk will occur in the future within the plan time horizon.
- ▶ Conduct Risk Analysis on a selection of risks that have an impact on the plan objectives, through the quantification of risk (sensitivity) and the determination of 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 the application of the reduction coefficient calculated based on existing presidiums. Selection of residual Top risks due to the positioning on the residual risk matrix (impact\*probability following application of the provisions) and the acceptability levels.

For each Top Residual Risk determined during the Risk Evaluation phase, mitigation actions (Risk Mitigation) are identified and periodically monitored in order to ensure accountability on the part of the Risk Owners with respect to the agreed mitigation actions and greater ease in escalation mechanisms to Top Management for actions that have not been completed or that have significant delays.

The process concludes with quarterly reporting to Top Management (Risk Reporting phase) for each issue developed under the Risk Management process, including indications of the progress of Action Plans and insights into specific risks.

Also considered, across most of the relevant issues listed above, are the ESG risks, related to the **Goals arising from the Sustainability Plan** and of the impacts arising from the failure/partial achievement of these goals, and the risks arising from the regulations under Legislative Decree 231/01 in terms of inadequate implementation of the regulations on the administrative liability of entities and associated crimes. These risks are managed through monitoring to verify the constant alignment with the forecasts of the Sustainability Plan and the updating and implementation of the adopted 231 model.

With reference to the main risks to which the company is exposed, including emerging risks that are new or that affect the level of exposure of known risks, see the Management Report, in the paragraph describing “risks and uncertainties”.

With specific reference to the relevant issue of combating climate change, a Scenario Analysis was carried out in 2021, which considered ERM (physical and transition) risks and the opportunities associated with climate change and with reference to 2022, the first TCFD report was published in line with the recommendations of the Task Force on Climate-related Financial Disclosure, to which reference is made for further information.



## PREVENTION OF CORRUPTION

GRI 205-3

With a resolution of the Board of Directors of 16 December 2021, INWIT adopted its **anti-corruption policy**, with a view to managing risk according to the “zero tolerance” principle. The policy, based on national and international regulations and reference best practices, has been developed from scratch, taking into account INWIT’s most vulnerable areas of corruption risk, and defines roles and responsibilities in the business context. According to legal or contractual obligations, the policy is intended for the entire company population, is published on the company portal as well as on the company’s website and has been shared with the Board of Statutory Auditors and the Control and risk Committee.

Following approval, members of the social organs and the corporate population received communication on anti-corruption policies and procedures. In addition, training sessions on compliance and business ethics 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 addition, the contractual clauses have been updated to ensure that the policy is also respected by third parties, and anti-corruption due diligence is expected on third parties.

### The main areas at risk for corruption called up in the policy are:



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

In 2022, no transaction was assessed for corruption risks, and no corruption was detected. As part of the ERM risk assessment, corruption risks are identified primarily in the risk of potential fraud against the company, as well as in the implementation of the 231 standards (with particular reference to relationships with location owners, suppliers, sponsors and extraordinary operations). Both risks were the subject of the annual ERM assessments.

## WHISTLEBLOWING PROCEDURE

In addition to the provisions of the Code of Ethics, with reference to the guidelines to request clarifications or to make reports regarding alleged violations of the Code, INWIT has adopted a Whistleblowing procedure (the last update of which took place in September 2022), With the purpose of regulating the process of receiving, analyzing and processing (including filing and cancellation) of reports, from anyone sent or even anonymous, concerning conduct that is also non-compliant with laws and regulations, however applicable to INWIT, as well as to the system of rules and procedures in force in the company, Among them the Code of Ethics and the Organizational Model 231.

In order to facilitate the reception and management of the reports, to guarantee the confidentiality by protecting the signaling and signaling, a computer system is operative that allows the sending of the signals (also in anonymous form). The system also supports the archiving of flags and analyzes and checks related to them. The whistleblowing reporting archive has limited access to the members of the Board of Statutory Auditors, the Supervisory Body and the Internal auditor’s function of INWIT. Complaints received by the Board of Statutory Auditors also fall within the scope of Whistleblowing.

### The reports may, in particular, concern:

- 1 requests for clarification on the correctness of the conduct of one’s own or of others for the purposes of full compliance with the Code of Ethics;
- 2 communications of alleged violations, requests or claims for violation of laws or regulations, requirements of the 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 organizational model 231 as a result of criminal and/or illicit risk behavior provided for in the organizational model 231;
- 4 complaints relating to alleged findings, irregularities, and censurable facts;
- 5 discloses (complaints) 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 Internal auditor’s 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. 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 SB.

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



During 2022, an anonymous report was received, which was taken over by the supervisory body for preliminary examination, in order to assess, in general terms, the importance of the report as well as the possible different management competence. The report was then analyzed by the Internal Audit function and, finally, the conclusions formulated by the OdV were reported to the Board of Directors in the OdV Half-year Report. On the subject of reporting, it should be noted that, in general terms of process, the OdV sends, through the Audit Function, a monthly report on all reports received in the reporting period, to the Board of Statutory Auditors, subject to the timely communication of the results of the analysis on individual reports, if there are elements of relevance.

In addition, the SB provides the Board of Directors with a complete summary of the reports received and the activities carried out, in the half-Year Report, also transmitted to the control and risk Committee. Regarding, the reported facts, no infringements of rules, regulations, internal procedures, irregularities and/or censurable facts were detected. However, opportunities have been identified to improve the Internal control system, which will be part of the monitoring and surveillance activities for 2023.

## DATA PRIVACY

GRI 418-1

During 2022, the Company had the opportunity to test the proper functioning of its Data Protection Organizational Model, as approved by the Board of Directors in 2021. To guarantee a more effective and capillary application of the above model, "privacy contacts" have also been identified for each business function.

In implementation of this model, privacy policies and procedures have been adopted by design and by default, data breach, stakeholder rights management, risk analysis, data protection impact and system administrators. In particular, in accordance with the relevant company procedure, the privacy contacts of each function, with the collaboration of the Company's compliance contact, and under the supervision of the Data Protection Officer, have updated the Register of treatment activities. Subsequently, the treatment risk analysis was updated, and a new treatment risk analysis was performed.

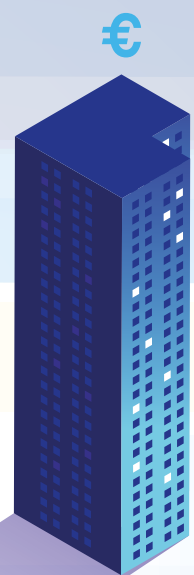
In order to guarantee an effective understanding and diffusion of the normative principles and the procedures adopted, training sessions were organized in this regard, also according to the new format "Compliance Pills", provided for each corporate function within the weekly "staff meetings" and within the six-month "Compliance Newsletter" issued, Internally, by the Legal and Corporate Affairs function.

In the context of the management of relations with third parties, including customers, the appropriate contractual clauses have been adopted, adaptable in light of the concrete case, as elaborated in 2021, as well as special information containing also the rights exercised by the interested parties and the contact data of the DPO. In this context, the personal data of the clients processed by INWIT - also through designated data processors - are, in large part, common data such as, for example, Personal and contact data and for purposes related to the execution of the contractual relationship with the Company or for market surveys.

Personal data are kept for the time strictly necessary for the pursuit of the purposes, except for different terms provided by the law in specific cases (contactises, complaints, etc.). New privacy policies have also been published on the institutional website for the users of the website, as well as for the conscious approval of the use of cookies. Finally, it is noted that, as in 2021, no substantiated claims were received during 2022 regarding breaches of customer privacy and loss of their data.







# FINANCIAL CAPITAL

## ECONOMIC-FINANCIAL DATA

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

Main economic values (€ mgl)	december 31, 2022	december 31, 2021	Delta
Total revenues	852.991	785.150	8,6%
Purchases of materials and external services	(43.523)	(44.697)	(2,6%)
Cost of staff	(21.387)	(18.422)	16,1%
Other Operating expenses	(8.893)	(7.150)	24,4%
<b>EBITDA</b>	<b>779.188</b>	<b>714.881</b>	<b>9,0%</b>
Depreciation, amortization, losses and write-downs of non-current assets	(363.716)	(360.131)	1,0%
<b>EBIT</b>	<b>415.472</b>	<b>354.750</b>	<b>17,1%</b>
Income/(financial charges)	(81.223)	(90.082)	(9,8%)
<b>EBT</b>	<b>334.249</b>	<b>264.668</b>	<b>26,3%</b>
Income taxes	(40.910)	(73.272)	(44,2%)
<b>Result of the period</b>	<b>293.339</b>	<b>191.396</b>	<b>53,3%</b>
<b>EBITDAaL</b>	<b>586.999</b>	<b>519.960</b>	<b>12,9%</b>

## ECONOMIC VALUE DIRECTLY GENERATED AND DISTRIBUTED

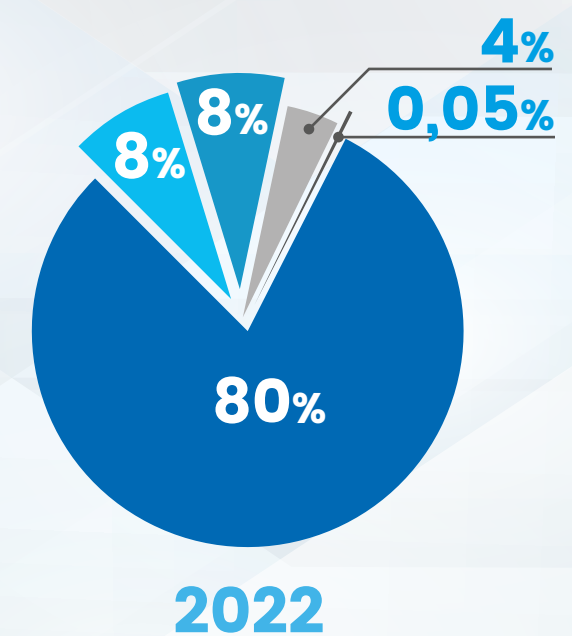
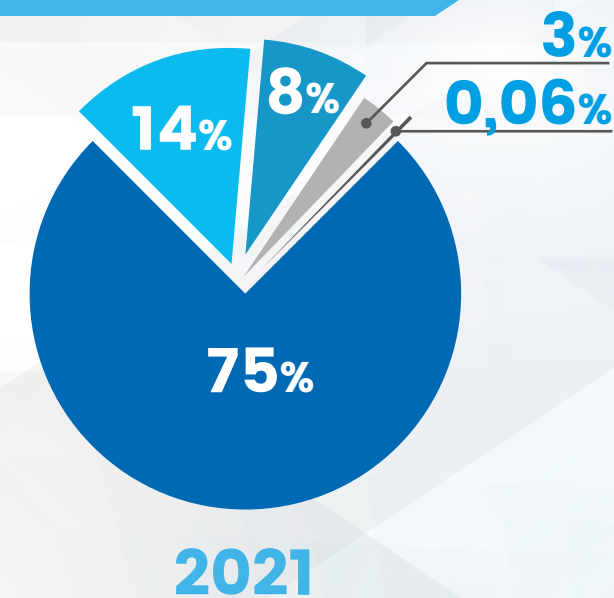
GRI 201-1

In line with the methodology defined by the GRI Sustainability Reporting Standards, a reclassification of the income statement was carried out in order to determine the wealth distributed by INWIT. In 2022, INWIT generated an economic value of almost 853 million euros, an increase of 9% compared to the previous year.

	2021	2022	Delta
<b>Economic value generated</b>	<b>785.158.160</b>	<b>852.991.129</b>	<b>9%</b>
<b>Distributed economic value</b>	<b>536.478.428</b>	<b>518.082.414</b>	<b>-3,4%</b>
Reclassified Operating expenses	44.697.111	41.425.767	-7%
Salaries of staff	18.421.840	21.386.511	16%
Investments in the Community	332.664	247.419	-26%
Financiers and shareholders	399.755.013 <sup>6</sup>	414.112.861	4%
Public Administration	73.271.800	40.909.855	-44%
<b>Retained economic value</b>	<b>248.679.732</b>	<b>334.908.609</b>	<b>35%</b>

The distributed value, in 2022 more than 518 million euros, represents the organization's capacity to respond, in terms of available resources, to the needs of its stakeholders, in particular toward its financiers and shareholders, toward suppliers of goods and services (reclassified Operating expenses), toward its employees (Salaries of staff), toward the community and the public administration.

Distributed economic value



- Public administration
- Salaries of staff
- Reclassified operating expenses
- Investments in the community
- Financiers and shareholders

As the graph shows, the largest share of value distribution in 2022 was allocated to financiers and shareholders (80%), 8% to government, 8% to suppliers of goods and services, for 4% to staff remuneration and little more than 247.400 euros paid in grants, scholarships and internships to the community. For further details on the performance and management of the economic and financial aspects, please refer to the 2022 financial report.



<sup>6</sup> It should be noted that the 2021 figure was restated following the inclusion in the item "Lenders and shareholders" of the payment of dividends, equal to 309,664,500 euros, for comparability with the figure obtained for 2022 (the 2021 dividends paid were equal to 307,498,662 with a residual debt of 2,165,838).



## SUSTAINABLE AND FACILITATED FINANCE

In March 2022, INWIT signed the agreement for changes to the €500 million revolving credit line, as part of the financing operation to support the merger with Vodafone Towers, with a pool of 10 banks. This is a renegotiation of the Revolving Credit facility in the technical form of Amendment & Extension, with the achievement of multiple results:

- ▶ Elimination of *financial covenants* of 7 x EBITDA Leverage pre-IFRS16;
- ▶ 2-year extension of the deadline – from March 2025 to March 2027;
- ▶ Margin reduction;
- ▶ Transformation into ESG KPI linked, with the inclusion of ESG KPIs with bonus/malus mechanism on the margin based on the achievement of the KPI levels identified in the Sustainability Plan:
  - ▶ Reduction of CO2 emissions
  - ▶ Gender quality
  - ▶ Digital inclusion

In November 2022 48, a top-up of the financing with the European Investment Bank (EIB) was signed to support INWIT's investment plan for the development of digital infrastructures in Italy for the service of telecommunications operators. The financing is in addition to the previous 250 million which was signed in 2021.

The project is in line with INWIT's industrial plan, which includes investments in the construction of new towers for the deployment of 5G, and indoor and outdoor mobile network coverage such as small cells and distributed antenna systems (DAS) as well as in the experimentation of new innovative technologies to support operators. A network infrastructure that will also be available for the hospitality of fixed Wireless Access (FWA) equipment, to extend fixed broadband coverage in areas with low population density.

## TAXATION

INWIT operates exclusively in the national territory, having no subsidiaries or branches abroad. In particular, the company is subject to taxation in Italy, where all the income produced and pays all the taxes due according to the current pro tempore legislation, operating in the formal and substantial respect of all the regulations and practices of a fiscal nature and with an attitude of cooperation and transparency with the national tax authorities.

Tax processes are constantly supervised as they are monitored in the procedures defined by the Internal control system. Starting from 2022, structured processes dedicated to the identification, assessment and management of fiscal risk have been introduced, also with a view to continuous integration with the codes of conduct adopted by the Company (e.g., Code of Ethics, Organizational Model 231, System of Controls referred to in L.262/2005, etc.).

The aspects of the control and management of tax risks are, in fact, part of the wider category of risks related to non-compliance than the reference legislation in the management report. The Board of Statutory Auditors shall ensure 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, taking the necessary resolutions provided for by the law in the event of infringements.

The company's financial statements are subject to legal review. Ultimately, proper management of the tax variable is essential for INWIT, its shareholders and all third parties interested in its activities.

The taxes due by society are an important part of the wider economic and social role that society plays in the country and in the communities in which it operates. Reference is made to the data in the management report for a detailed treatment of income taxes.

## TAXONOMY

In June 2020, the EU 2020/852 Taxation Regulation<sup>7</sup> issued 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. In particular, the Taxonomy is a unified, European system for classifying sustainable economic activities, with the aim, on the one hand of introducing guarantees of comparability and transparency in the markets of sustainable finance and the green economy, on the other hand, to create a language common to all investors to be used to invest in projects and economic activities with significant positive effects on the climate and the environment in general.

All companies that fall under the taxonomy Regulation obligations must report on how and to what extent their activities are associated with activities that are considered environmentally sound under the EU taxonomy.

**Specifically, for the purposes of this Regulation, in order to qualify as environmentally sustainable (or “eco-sustainable”), an economic activity must jointly meet a number of conditions**

- ▶ contribute substantially to one or more of the six environmental objectives referred to in article 9 of the regulation;
- ▶ comply with the technical screening criteria laid down by the Commission for each individual environmental objective;
- ▶ do not cause significant damage to other environmental objectives (“do not significantly harm” principle);
- ▶ be carried out in accordance with minimum safeguards (in line with OECD guidelines and the UN/ILO guidelines on economic activities and human rights).

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

In particular, for this second year of application, provision should be made for information to include the share of the economic activities aligned with the taxonomy (Taxonomy – aligned) and not aligned with the taxonomy, in relation to its turnover, of capital expenditure and total operating expenditure incurred. The evaluation process of INWIT began in 2021 by examining the Taxation Regulation and delegated acts

<sup>7</sup> Of 18 June 2020 amending Regulation EU 2019/2088.

and by verifying the inclusion of economic activity in the list of activities in the annexs to the delegated act. In order to determine the eligibility of economic activities, the “Statistical Classification of Economic activities in the European Communities” (NACE) was analyzed in comparison with the descriptions of the activities contained in Annex I and Annex II of the Climate Delegate Act.

The analysis found that INWIT’s business activity was not eligible in the Taxonomy in relation to the objectives of “Climate Change Mitigation and Adaptation”, which are indicated respectively in Annex I and II of the Climate Delegate Act.

The results of the analysis were also confirmed for 2022, so that INWIT has no eligible activities and consequently aligned with taxonomy. Since the analysis carried out last year, also for 2022, the share of

				Criteria for the substantial contribution					
Economic activities (1)	Code(s) (2)	Absolute capital expenditure (3)	Share of capital expenditure (4)	Mitigation of climate change (5) %	Adaptation to climate change (6)	Marine waters and resources (7)	Circular economy (8)	Pollution (9)	Biodiversity and ecosystems (10)
A. ACTIVITIES ELIGIBLE FOR TAXONOMY									
A.1 Eco-friendly activities (aligned to taxonomy)									
Activity 1		0	0%	0%	0%	0%	0%	0%	0%
Activity 2		0	0%	0%	0%	0%	0%	0%	0%
Capital expenditure of eco-sustainable activities (in line with taxonomy) (A.1)		0	0%	0%	0%	0%	0%	0%	0%
A.2 Eligible activities for taxonomy but not sustainable (activities not aligned with taxonomy)									
Installation of photovoltaic systems	7.3	793.697 €	0,4%						
Installation of free-cooling systems	7.3	2.347.500 €	1,3%						
Installation of current rectifiers	7.6	3.677.857 €	2%						
Capital expenditure of activities eligible for taxonomy but not environmentally friendly (activities not aligned with taxonomy) (A.2)		6.819.054 €	3,6%						
Total (A.1+A.2)		6.819.054 €	3,6%						
B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY									
Turnover of activities not eligible for taxonomy (B)		180.180.946 €	96,4%						
Total (A+B)		187.000.000 €	3,6%						

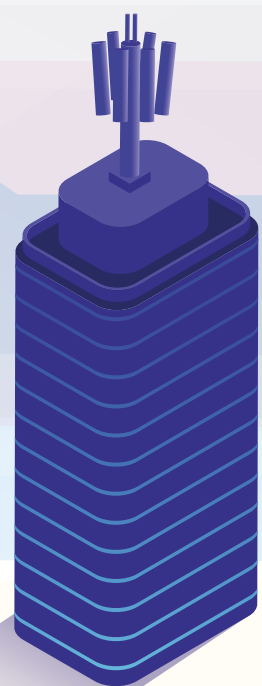
capital expenditure (Capex) and operating expenditure (Opex) considered eligible for Taxonomy has been verified.

Considering the nature of the evolution of the legislation and pending the publication of the additional delegated acts relating to the other environmental objectives provided for in the Regulation, INIWT plans to follow its developments and to carry out, where necessary, further details and updates of the information.

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

Criteria for “not causing significant damage”										
Mitigation of climate change (11)	Adaptation to climate change (12)	Marine waters and resources (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)	Minimum safeguard guarantees (17)	Shares of capital expenditure in line with taxonomy year N (18)	Share of capital expenditure in line with taxonomy year N-1 (19)	Category (Enabler) (20)	Category (transition activities) (21)
N/A	N/A	N/A	N/A	N/A	N/A	N/A				
N/A	N/A	N/A	N/A	N/A	N/A	N/A				
N/A	N/A	N/A	N/A	N/A	N/A	N/A				





# **INFRASTRUCTURAL CAPITAL**

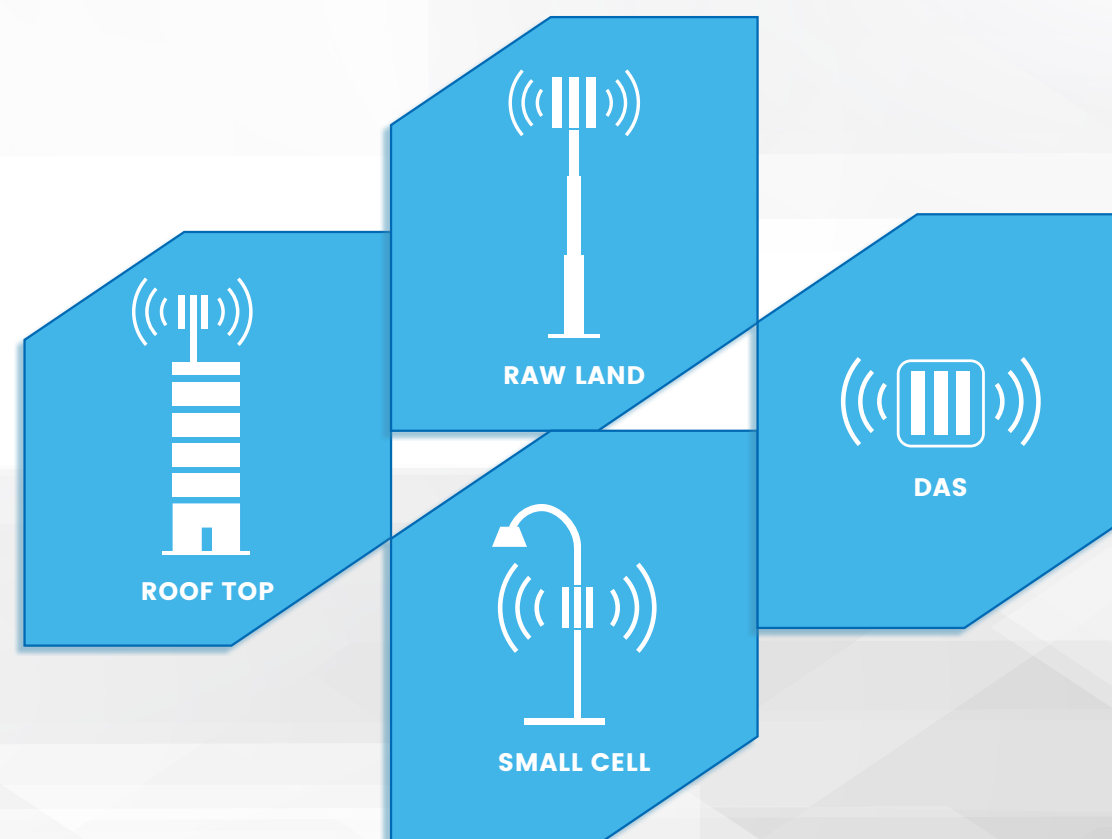
## INWIT SERVICES



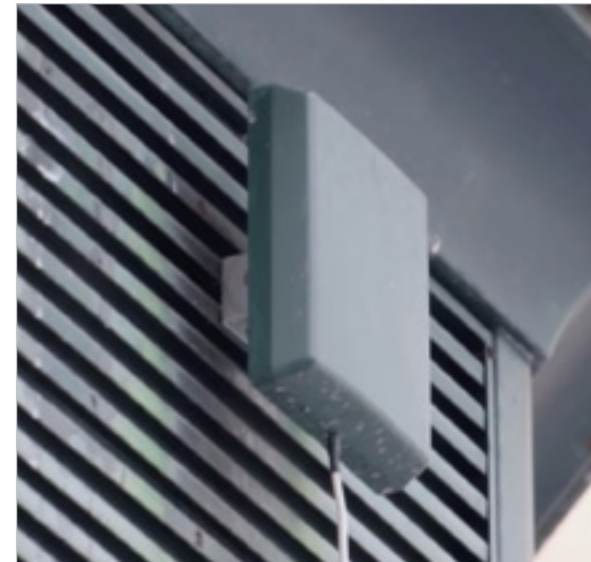
INWIT, in its role as neutral host and according to the logic of Tower as a Service, offers a plurality of integrated services, which allow to diversify its business. The core business of the company is identified in the offer of "integrated services of hospitality" with the more than 23.000 towers distributed throughout the national territory (one tower every about 3 km in rural environments and one every about 5-600 m in centers with high density of housing), characterized by proximity to customers, present in both urban and rural environments and most of them connected in fiber optics. INWIT provides its customers, starting with anchor tenants, infrastructure for wireless networks, towers and trestles for antennas, cabling, parables, equipment spaces, technological power plants.

In addition, INWIT has started the expansion of its business in the sector through infrastructures that guarantee a more effective reception of services for mobile telecommunications: DAS (distributed Antenna System) and small cells, as well as building backhauling networks.

more than 23.000 towers distributed throughout the national territory:



### DAS (DISTRIBUTED ANTENNA SYSTEM):



it is a system of indoor antennas, distributed within a structure, that transmits in full security, a cellular signal multi-operator. The signal is generated by a central unit to which all the micro-antennas are connected, guaranteeing a capillary coverage in particular for locations of medium/large size and with high a density of persons.

The DAS are characterized by a high dedicated and guaranteed capacity of voice and data traffic, by devices with extremely small dimensions and negligible environmental and electromagnetic impact. In December 2022 INWIT had 201 DAS.

### SMALL CELL:



they are the most suitable solution to offer cellular service in densely populated urban contexts, in areas where environmental constraints persist and areas where the architectural decoration as well as the monumental/landscape heritage must be preserved. small cells are typically installed on lampposts, wall mounted, camouflaged as shop signs/advertising totems, and have a coverage range of about 200 meters. Each small cell consists of an antenna and a radio apparatus, connected to each other by means of coaxial cables. The radio apparatuses, on the other hand, are connected in optical fiber to the nearby telecommunication tower that acts as an edge aggregation point. As of December 2022, INWIT has 1.388 small cells.

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 better described below, the use and development of these micro-plants is at the heart of INWIT's innovation goals and the growth of new 5G technology. Such facilities will be needed to enable coverage of new network technology, particularly in indoor environments, where 5G frequencies will have the greatest difficulty penetrating.

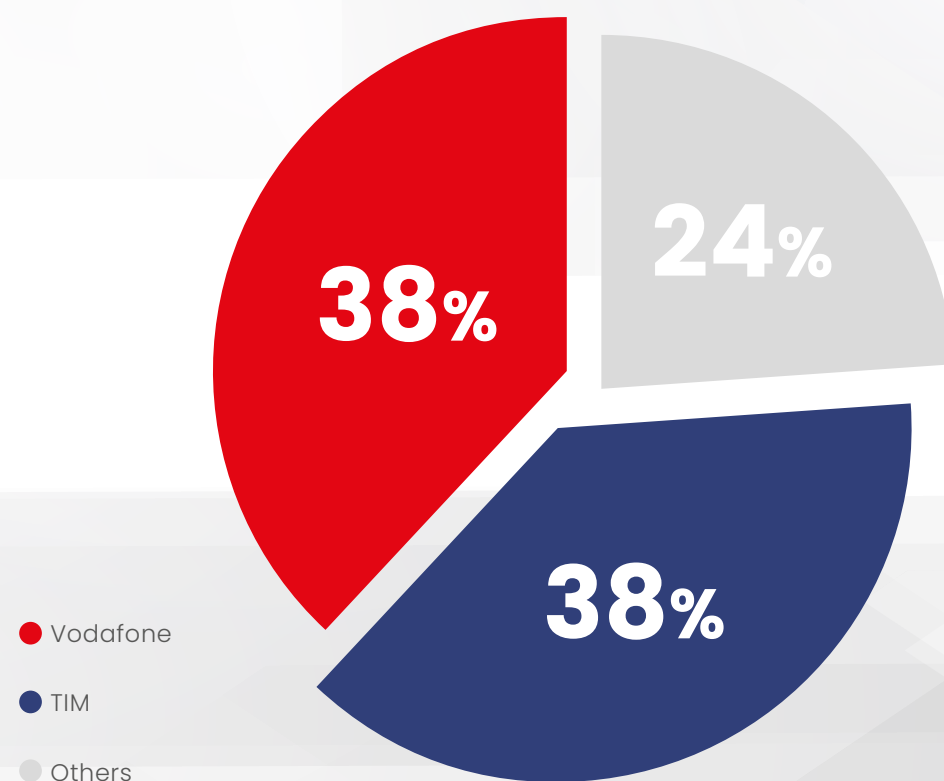


## HOSPITALITY AND GUESTS

### INWIT's main customers are:

- ▶ All national mobile radio operators ("Mobile Network Operator" MNO): TIM, Vodafone, WindTre and Iliad.
- ▶ Fixed Wireless Access (FWA) operators such as OPNET, Fastweb, Eolo, and Open Fiber, which provide 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 the transmission and diffusion of radio and television signals (e.g., technologies in DVB-T standard); Institutions, public bodies, Armed Forces for the creation of private networks.

Figure 7 Distribution % of the hospitality to 31.12.2022.



Since 2017 INWIT has obtained **the ISO 9001:2015 certification** of the process relating to the provision of integrated services of hospitality of radio transmission equipment, both for telecommunications and for the broadcasting of television and radio signals, to the construction and/or disposal of sites, to the supply and marketing of multi-operator indoor covers as well as to the ordinary/corrective and extraordinary maintenance of indoor and outdoor sites, including special covers such as tunnels. INWIT has recently integrated Quality Policy with Environment and Health and Safety Policy. The ISO 9001 Quality Management System was recertified in January 2023.

## MAINTENANCE ACTIVITIES

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

### Maintenance activities:

- ▶ Routine and corrective maintenance aimed at ensuring the adequacy and efficient functioning of the structural elements (poles, pylons) and of the technological infrastructures present on the sites, as well as the updating of the periodic statutory certifications foreseen for the climbing ladders, the masses to the ground, the fire extinguishers, the metallic articles, the stackles.
- ▶ Extraordinary maintenance aimed at maintaining the quality and performance standards of civil, structural and technological infrastructures (e.g. replacement of obsolete or ill-equipped components, civil works on structures (rooms, shelters), adoption of new systems with greater energy efficiency, etc.).
- ▶ Site management aimed at ensuring the safe accessibility and physical security of the sites, with a view to protecting and combating criminal phenomena (theft, vandalism).

These services are mainly aimed at maintaining the site fleet efficiently, through the continuous monitoring of the maintenance status, the prevention activities on the sites carried out twice a year, and the timely intervention in case of service interruptions, mainly related to power outages related to electrical suppliers, as well as malfunctions in technological systems (power and air conditioning systems).

These interruptions are quantifiable in the order of about 17.000 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 behalf of INWIT in the territory, in case of disservice on the technological systems.

The average frequency is quantifiable in about 0,7 cases per year per active site, and the average duration of disservices varies between 10 and 12 hours.



## CUSTOMER EXPERIENCE

With the aim of strengthening the importance of listening to a priority stakeholder category for the company, customers, INWIT, has provided an organizational presence on the Customer experience theme, with the aim of defining tools, criteria, methods of measurement and evaluation of the quality of the service offered. In this direction a specific model of systematic detection of customer satisfaction was designed, useful to map the variations and the trend of the parameters over time, on the basis of any corrective actions taken.

**Two specific KPIs of interest have been identified, which are the subject of evaluation:**

- 1** The Net Promoter score provides a kind 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** The Overall Satisfaction provides an evaluation of the Customer experience closely linked to functional aspects, both in terms of services and organization.

Measurements were made, applied to the entire INWIT active customer base, from 2021, with a participation rate of 78%, replicated in 2022 with a participation rate of 64%. The 2022 survey showed a marked improvement in both the Net Promoter score and overall Satisfaction.

The joint evaluation of these two indices, which detect a mix of emotional and operational aspects, represents an optimal representation of the quality of the ongoing relationship between client and INWIT. 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, customizable according to the specific need, that provides a measure of the "here and now" type with respect to specific interactions with the organization, to the use of a service or to the fruition of an event.



## CYBER SECURITY

A full review of Information & Cyber Security (I&CS) procedures and processes has been launched since 2021, completed in 2022 with the definition of other assets for the security discipline and will be further refined in 2023. The Company has appointed an I&CS contact person, to whom functions, and responsibilities have been assigned in relation to the security of INWIT's information assets. 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 to reports of potential phishing attacks.

The I&CS contact person works in a synergic way with the risk Compliance function for the functional actions to the regulatory compliance concerning the PSCN (perimeter of National Cyber Security - L. 133/2019 and related implementation DPCM). In this scenario, the I&CS contact person is accredited to the National Cybersecurity Agency for interactions with CVCN (National Evaluation and Certification Center) in the context of INWIT compliance as a subject within the PSNC.

The Information Security Policy (ISP) has also been defined and published based on which operational 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 and Backup & Restore Policy have been formally defined.

For INWIT, the purpose of adopting the Information Security Policy (ISP) 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.

Moreover, 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 management of information security, 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. Which operates 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. To ensure suitability, adequacy, and effectiveness always, 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 to follow, 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 the management of any critical events, ensuring productive continuity and avoiding operational downtime.

### INWIT prepared its first Business continuity (BC) Plan in 2021 under 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, its applications and suppliers), with the aim of identifying and managing the main risks in place 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 or 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, its applications, vendors). 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, an update of the Business continuity Plan was carried out in relation to the new company structure. Critical resource training activities were planned during 2023. 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 the next two years.

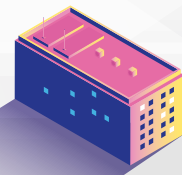




# INTELLECTUAL CAPITAL



## 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.

The objective of INWIT, as per the Sustainability Plan, is to be an actor, in support of the operators, in the digitization of the country according to a Tower as a service logic, thanks to the capillary diffusion of its infrastructures and contributing significantly to the wireless coverage of the Italian territory, this is also due to the development of new technologies, starting with 5G and FWA.

INWIT aims 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.

### Innovation for INWIT searches for interventions and operations in the following areas:

- 1 Monitoring activities.
- 2 Construction of innovative infrastructures.
- 3 Radio innovation
- 4 Digitizing assets
- 5 Open Innovation collaborations.

## MONITORING

In the context of monitoring activities, the main activities carried out in 2022 concerned the following initiatives:

### Air quality monitoring via IoT sensors City of Turin:

The objective of the experimentation is to provide citizens with an air quality monitoring platform that allows everyone access to clear and transparent information and allows the Administration to guide its urban development policies, continuously monitoring the impact and thus maximizing its effectiveness. INWIT, in a Tower as a service perspective, hosts on board its towers the LoRa gateways and sensors for monitoring, collects the data, stores it and transmits it to the front-end platform of the partner Wiseair through which, the end customer, will be able to use the aggregated data.

### Pugliese Aqueduct water Network Monitoring:

Initiatives with the aim of monitoring, in the Palagianello area, the water supply consumption through the use of LoRa sensors and the installation on board the INWIT towers of a dedicated gateway for the collection of data coming from them.

### Motorway infrastructure monitoring with drones:

Project completed in early 2022 that included drone monitoring of third-party infrastructure, 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.

### Fire risk monitoring Oasi WWF Italy:

In 2022, INWIT started the collaboration with WWF with the aim of supporting the association in the prevention of fire damage in the oasis of Macchiagrande (Rome), Bosco di Vanzago (Milan) and Calanchi d'Atri (Teramo), through cameras installed at high altitude on the towers. Alarms and associated images, detected by devices, are collected by the tower gateway and made available through dashboards. In fact, on board the gateway is installed an artificial intelligence software capable of detecting fires, up to 5 km away, through analysis of the images and associating to each image the percentage of probability that the event is occurring.

### Structural monitoring of INWIT infrastructures:

In 2022, INWIT started the second phase of the installation of accelerometers to monitor the conservation status of its infrastructures. Accelerometers monitor the way the infrastructure vibrates and detect possible variations in stiffness generated, for example, by structural reinforcement interventions and by the thinning of the sheet metal.

### Controllo degli accessi ai siti con sistemi meccatronici.

To improve the monitoring and control of access to its sites, INWIT has since last year started a scouting activity to identify cutting-edge solutions for access control on its infrastructures. As part of the engineering process that will lead to a global management system for the physical security of INWIT sites. 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, corroborated by test sessions in the laboratory, linked to the dual need to test in the field the proposed solutions and to allow the closure of the access tickets due to the malfunction of the existing mechatronic locks. 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.

Over 3000 new locks were installed in 2022 and more than 2000 accounts were registered in the system, with their access key.



## INNOVATIVE INFRASTRUCTURES

### Quick site.

After the introduction of multi-operator fast-site plants in 2021, of which 36 were built in 2022, INWIT has built a *Quick site system*, which provides for the installation of a prefabricated raw-land consisting of a prefabricated foundation in reinforced concrete and a modular lattice metal tower. The various elements, conceived to be assembled in place by realizing three layers provided with closing side walls, are constrained to each other by means of a system of mechanical anchors consisting of threaded bars, bushes, and nuts.

This type of antenna support structure allows the installation of equipment in multiple configurations, which can be evaluated from time to time, based on actual requirements, to the specific design (antenna orientations, number of operators present, number of parabolas required, etc.) and in relation to the specific wind conditions of the installation site.

The benefits of this solution are immediate installation and use, reduced digging volumes and speed of installation and disinvestment.

### Phase Change material.

In 2021, INWIT produced a very innovative proof of concept in energy efficiency. The aim of the project is to achieve significant economic savings and environmental benefits in the thermal management of shelters, by PCM phase Change material (materials that, by changing state, absorb and release heat from the environment) – in the context of base radio stations, engineering their application and validating their sustainability.

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 releasing it, then, during the cool hours of the night, thus replacing the air conditioners, with a significant reduction in consumption.

In 2022, the second phase of the project was started, which saw the application in the field of a reengineered and optimized system, and the addition of a second tank of material. This evolution has allowed the use of the air conditioner to be completely canceled.

This solution generates benefits in terms of reducing 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.

### Overall, 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 can 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.

## RADIO INNOVATION

### ORAN Alliance.

Since 2021 INWIT has 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.

### European project “5G Carmen”

The project, funded by the European Union under the “Horizon 2020” program and coordinated by the Bruno Kessler Foundation (FBK), was aimed at leveraging the latest advances in 5G technology to provide a multi-tenant platform that supports the automotive industry by delivering more safety and smarter transport with the ultimate goal of enabling cars to drive independently.

The experiment involved 600 km of roads through three countries (Italy, Austria, and Germany), along the motorway corridor Munich-Bologna, one of the most important sections for traffic volumes, identified by the European Union where to intervene to improve the mobility of people and goods throughout Europe. The key innovations focused on developing a self-managing hybrid network system, combining V2V (vehicle to vehicle) and V2I (vehicle to infrastructure) short-range direct communications with V2N (vehicle to radio network) long-range communications.

The platform (through which vehicles can change speed, position, trajectory/maneuver, etc.) employs several enabling technologies such as 5G, C-V2X (vehicle Cell Communication to all) and a cross-border orchestration system to provide 5G-enabled end-to-end CARMEN services.





## ASSET DIGITIZATION

Already in 2018, INWIT has started a substantial project to realize a digital twin of its entire telecommunications infrastructure fleet, 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, is the reference player, being the first TowerCo in Europe to have digitized the entire fleet of its infrastructures by means of 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.

The platform, founded in 2021, with the aim of standardizing and accommodating all BIM models of INWIT infrastructures and converting them according to the new modeling logic, is constantly evolving to keep up with the technologies and the needs linked to the design activities. Already connected to some INWIT platforms, such as Éfesto, with the sharing of geometries and data related to the radiant system, during 2022 further interconnections with other business applications for the management of open activities/proposals on sites and for the management of digital identities linked to users were realized and strengthened. An entire section dedicated to the new activities has been developed which allows the development of the BIM model from the first steps of the design up to the testing, with the possibility to monitor and validate the possible temporary project. New features have been introduced throughout the year, to carry out an easier and safer export and delivery, toward the functions concerned, through the automatic extraction of the tables from the model and the tracking of the activities through blockchain.

### Ermes.

In 2022, the Ermes platform was the subject of an adoption thanks to the survey activities initiated by INWIT in order to keep up to date the details of the assets present on our own sites. More than 2.000 sites were detected in point clouds in the year with this mobile application. During this period several back-end features for survey management have also been implemented.

Furthermore, the AI module has been developed which allows automatic recognition of the components installed in the equipment area starting from the images collected on site. This feature is of fundamental importance for future developments that will concern the automatic updating of BIM models to the actual state of the site.



### 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 radio configurations (antenna model, antenna power, electric tilt, etc.) of the host operators and from the structural data relating to the height positioning and orientation of the antennas, 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, 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 parameters of the site (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.

The objective of harmony is to perform an efficient and effective management of the logistics of the equipment (energy stations, air conditioners, batteries, electrical switchboards, 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.

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, believes it is essential to operate according to an open innovation logic – by engaging in partnerships with start-ups, companies, universities, and research entities that lead to increasingly 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, in a logic of tower as a service, for purposes that go beyond that of neutral host for the telecommunications operators.

### Predictive maintenance for fault management (Turin Polytechnic).

This project arises from the need of INWIT to optimize the frequency and consequently also the costs of corrective maintenance interventions on its sites as regards the whole part that is under its direct responsibility, that is the infrastructures (poles, pylons, pylons, etc.) and the “passive” apparatuses (energy stations, batteries, transformers, air conditioners, electrical switchboards, site gateway, etc.).

For this purpose, it was considered of great interest to deepen the topic of predictive maintenance, a type of preventive maintenance that, through different technologies, it allows to identify and measure the parameters that determine whether an intervention on the equipment/structures is necessary and that allows a proactive approach to the problem of maintenance, since it tries to anticipate the fault and not to repair it.

**Therefore, this project, starting from the analysis of the apparatuses and structures in use in the INWIT sites, has set itself the objective of studying the possibility of designing and implementing a prototype predictive system that allows to identify:**

- ▶ the parameters to be monitored (noise, vibration, oscillation, temperature, humidity, etc.);
- ▶ optional additional sensors;
- ▶ algorithms to be used and optimization of the same to make them adherent to the reality of INWIT, to be defined based on the data and information available concerning the apparatuses and structures in analysis:
  - a. identification of correlations between collected data and events of interest to be prevented (failures, phenomena of deterioration of the... apparatuses);
  - b. evaluation of the prognostic significance of the correlations identified, with validation through data-driven metrics and analysis by domain experts;
  - c. possible integration of models (available in literature or supplied by the manufacturer) relating to the operation of the apparatus under study and to the processes of deterioration and failure of these components of the system
- ▶ How to manage maintenance cycles to optimize service times and intervals (SLA and cost optimization).

### Automatic BIM modeling: Creation of digital models of INWIT infrastructures (Turin Polytechnic).

BIM automatico è il progetto sperimentale, iniziato nel 2020, che ha lo scopo di realizzare un'applicazione che, sfruttando logiche di Augmented Reality e/o Virtual Reality, consente, tramite l'utilizzo di un target fisico, di ancorare e sovrapporre il modello virtuale all'immagine reale inquadrata con smartphone o tablet, di leggere il dettaglio delle componenti, selezionandole, e di evidenziare gli oggetti non conformi che potranno essere modificati in un secondo momento all'interno del modello.

Nel 2022 sono stati testati nuovi modelli di anchoring cercando di sostituire il target fisico con target a modello. Questi test sono volti a rendere scalabile l'applicazione sull'intero asset di INWIT ed includono la possibilità di sfruttare la nuvola di punti Lidar acquisita in loco.

Sono state implementate ulteriori funzionalità per rendere l'allineamento modello-immagine reale più immediata per l'utente. L'applicazione è stata inoltre agganciata al back-end della piattaforma di BIM Management Athena per poter accedere al repository dei modelli BIM.

**The application takes on a strong connotation of support to the operation of multiple subjects that operate on the INWIT sites among which the main ones are:**

- ▶ Design studies: to detect the state of the places for the next infrastructure adjustment project, checking in the field the possible deviation from the digital model present in ATHENA.
- ▶ Companies implementing site adjustments: to visualize in AR the changes that will have to operate on the site through the superimposition of the project to the real state of the plant.
- ▶ Service Operators: to identify objects that will be impacted by their activity by viewing the planned intervention in AR.

### Fuel cells (Salerno's University).

In 2022 INWIT launched a new project focused on the accumulation and possible “green” supply of sites, using hydrogen, in collaboration with the University of Salerno, which has a solid international know-how regarding the use of this carrier for the production and storage of electricity.

In particular, *Fuel Cells* with SRB support, i.e., green hydrogen batteries for storage and SRB power supply, have been designed.

**To better adapt the realization of the fuel cell system to the systems already present on the INWIT sites, two macro-solutions have been proposed:**

- ▶ with electrolyzer (membrane cell in addition to a low-temperature storage system).
- ▶ reversible (solid oxide cell in addition to high temperature thermal storage).

After a series of analyzes and studies of technical and economic feasibility, it was found a first project of the hydrogen-powered fuel cell plant to be tested on a limited number of INWIT sites, whose evaluation should continue at a later stage.

### Milan Polytechnic's Observatory.

For the third consecutive year, INWIT has participated as a partner in **the 5G & Beyond Observatory**, research activities of the Milan Polytechnic, on the evolution of 5G network standards and the offer in the field of Edge Computing/ Slicing, Open ran, mm Wave, dedicated networks and the state of diffusion of their devices (consumer and industrial).

This project has enabled the participants to study the level of knowledge of the 5G theme and the understanding of opportunities on the part of the players in the digital chain and of the Italian end-user enterprises, 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.

In 2022, INWIT strengthened its collaboration with the Milan Polytechnic, also participating in connected **Cars & Mobility and Drones and Advanced Air Mobility Observers**, confirming itself to the forefront in the monitoring of the connected technologies of the near future.





# **SOCIAL AND RELATIONAL CAPITAL**

## SOCIAL AND RELATIONAL CAPITAL

GRI 2-28



INWIT has undertaken a complex and challenging program aimed at creating long-term value and contributing to the digitization of the country and the reduction of the digital divide, necessary to contribute to the cultural, social, and economic development of the communities in which it operates.

Digitization means, in fact, laying the groundwork for reducing inequality and 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, first and foremost by combating new digital illiteracy and social and cultural discrimination.

The role of INWIT, in this scenario, is to support the implementation of the 5G network at the service of mobile operators throughout the country, proposing the infrastructure solutions that are most suitable also for the small realities that make up the Italian territory. In fact, the development of 5G can make it possible to take 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 widespread dissemination of a series of new technologies capable of positively impacting on environmental protection, control and security of territories and infrastructures.

Unlike previous generations, 5G, thanks to its speed, connection capability, and low latency, enables the development of an innovative ecosystem territorially and continuously connected devices, 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.

**In order to increase and encourage dialog with its stakeholders, both on the territories and at national level, INWIT has decided to join the following networks and associations:**

- ▶ **Civita Association**, committed to the search for an innovative dialog between the world of culture and the world of economy;
- ▶ **D value**, to support companies in promoting an inclusive culture and gender balance;
- ▶ **The Foundation is optimistic and rational**, and is scientifically based on the impact of economic, social, and technological changes on institutions and society.
- ▶ **The United Nations Global Compact**, the world's largest strategic enterprise citizenship initiative, which encourages companies around the world to create an economic, social, and environmental framework to promote a healthy and sustainable world economy that gives everyone the opportunity to share its benefits.
- ▶ **Unindustria** – Union of Industrialists and Enterprises Rome, Frosinone, Latina, Rieti, Viterbo;
- ▶ **Kyoto Club**, an association active, at national and European level, in promoting policies for renewable energies, energy efficiency and for reducing climate-altering emissions.
- ▶ **ASSTEL** – Assotelecomunications, a trade association which, in the Confindustria system, represents the telecommunications sector.

- ▶ **Soul for the social in the values of enterprise**, a non-profit association promoted by the Union of Industrialists and Enterprises of Rome and Lazio to spread among the enterprises of the territory the culture of corporate social responsibility and sustainability, in economic, social, and environmental terms.
- ▶ **Aspen Institute Italia**, an international organization committed to the most current problems and challenges of politics, economics, culture, and society, with particular attention to 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.
- ▶ **I-COM**, think tank to support companies in promoting competitiveness issues and analyzes within the Italian, European and international political-economic framework.
- ▶ **Ores Observatory**, a new generation of networks and services Observatory with the opportunity to insert corporate content and to encourage company participation in private forums with institutional stakeholders.
- ▶ **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 THE COMMUNITY AND IN THE TERRITORIES

GRI 413-1

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

### Possible impacts on the construction of its infrastructure can be attributed to two types:

- Environmental: Mainly linked to the landscape, architectural and health integration of installed infrastructure and installations or to the use of innovative low-impact infrastructure (where possible).
- Social: Linked to increased accessibility of networks by the population involved, with consequent benefits in terms of digital inclusion.

INWIT believes that, through collaboration and dialog with local communities, it is possible to guarantee a constant and widespread digitization of the country. In 2022, the commitment to undertake projects covering structures with a high social and cultural vocation (such as museums, universities, and hospitals) enabled more than 40 hospitals to be reached with projects for indoor coverage with DAS (distributed Antenna System) micro antennas. A fully 5G network-compatible system using ultra-low-power, ultra-small micro-antennas. In 2022 the multi-operator mobile radio coverage of the National Etruscan Museum of Villa Giulia in Rome was also realized.

Similarly, to strengthen the control of the activities that provide an interface with the national and local institutions, with reference to the critical situations present at the territorial level, to the definition of the company position, the intervention programs, and the priorities of action, INWIT has established **the Institutional Integration Steering Team**. Periodically, the Steering Team provides an update to the General Manager on the critical issues found in the operational processes, the related solutions identified and the progress of the defined action plan.



## INITIATIVES ON THE TERRITORIES

### Hospitals.

With the additional coverage realized in 2022, INWIT has reached to count more than **40 hospitals** equipped with indoor wireless coverage, realized through the micro-antennas DAS (distributed Antenna System), network infrastructures that make the reception of the mobile signal of the different operators optimal in any facility environment.

The importance of this health-care coverage service is not only related to facilitating communication with the outside world, but also related to the fact that access is granted to all services that can be developed as soon as 5G is available across the territory. Through these infrastructures, hospitals are more interconnected and digitized, and they will benefit from an increasingly innovative and patient-close health care system.

In particular, in March 2022, INWIT and ACISMUM (Association of Italian Knights of the Sovereign Military order of Malta) they signed the partnership for the realization of 5G-ready multi-operator indoor mobile coverage solutions within **the San Giovanni Battista Hospital** and the historic seat of **the Association of Knights of the Sovereign order of Malta** in Piazza del Grillo in Rome.

Thanks to the improvement of the mobile signal, important benefits will be gained for the work of health workers, patients, and their families, as well as for the workers and the workers of the historic building in Piazza del Grillo.

With this investment from INWIT, the two facilities will improve the quality of the connection and the hospital structure, will be able to think of a health care more in line with the times, with an innovative technology that will allow to develop and enable new digital and E-health services.

### Museums.

In 2022 INWIT signed the agreement for the multi-operator mobile radio coverage of **the National Etruscan Museum of Villa Giulia** in Rome with the aim of favoring the adoption of technological and digital solutions that can make live, as well as observe, the great historical and cultural heritage that they preserve. The wireless coverage in the exhibition rooms has been realized through DAS (distributed Antenna System) technology, an advanced and fast data reception system, with measures able to eliminate any visual impact, avoiding compromising the harmony and esthetics of the rooms and preserving the historical-cultural value of the building.

Thanks to this collaboration, the Museum will be equipped with a cover that will guarantee a uniform wireless signal in an exhibition area of more than 3.000 square meters in which collections include some of the most famous masterpieces of the cultures of pre-Roman Italy and of the Etruscans, together with extraordinary import objects from the Greek and near eastern world.



## THE REDUCTION OF DIGITAL DIVIDES

INWIT promotes and develops projects to increase the coverage of smaller areas, rural areas, and sites of high social and cultural value, aiming, on the one hand, at helping to overcome the geographical digital divide and, on the other hand, at promoting greater social and digital inclusiveness in the country.

In this sense, INWIT, with its digital infrastructure system, contributes significantly to the reduction of the digital divide. This important commitment is confirmed by **the agreement signed with Open Fiber** and the award of **the PNRR “Italia 5G Plan”** public call, through the temporary grouping of companies between the INWIT, Tim and Vodafone Italia.

In detail, the strategic agreement with Open Fiber provides for the coverage of more than 600 municipalities distributed throughout the country with FWA (fixed Wireless Access) technology. The agreement consists in the design and construction of up to 500 new sites by INWIT and its hospitality and infrastructure maintenance services.

The “Italy 5G Plan” provides for an intense program aimed at covering 1.200 market failure areas, by June 2026, through the creation of new network infrastructures suitable to provide mobile radio services with transmission rates of at least 150 Mbit/s in downlink and 30 Mbit/s in uplink. As a digital enabler for mobile operators, INWIT is a key player in reducing the digital divide that very often turns into social barriers, with 5G inclusion and development in mind.

In addition, in 2022, confirming its commitment to contributing to the reduction of the digital divide, it provided 417 hospitalities on its sites, to various operators, in 337 municipalities classified in areas in digital divide or with an IVSM indicator > 99. The IVSM is a synthetic indicator of social and material vulnerability, calculated by ISTAT. The indicators summarized are illiteracy, potential welfare distress, housing overcrowding, youth unemployment and schooling, and the number of families without an entry generated by an employment.

## ADVOCACY INITIATIVES

**Tour FOR 5G.** It is the second phase of a journey that began in 2021 with the Talk FOR 5G, focusing on the centrality and strategic importance of individual territories to foster the country's digital transition and counter fake news on the fifth-generation mobile network. In 2022, a cycle of events was carried out on the national territory, covering 4 important cities such as Naples, Rome, Florence and Genoa, aimed at stimulating the discussion and debate on the potential and benefits of digital infrastructures.

### The following titles are those of the meetings:

- ▶ “Naples: The power of connections”
- ▶ “Firenze Smart: A history of culture and innovation”
- ▶ “Rome – the new capital: Fast, digital and sustainable”
- ▶ “Genoa: Innovation and best practices”

The debates were enriched by the participation and contributions of more than 16 stakeholders, including members of Government, parliamentarians, Mayors, local directors, university teachers, journalists, entrepreneurs, and managers. During these meetings, the importance of acting at local level through training and information operations was discussed.

The links between 5G innovation and various industries, such as healthcare, culture for museum and village revival, and industry 4.0, 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.

## MANAGEMENT OF ELECTROMAGNETIC EMISSIONS

Telecommunications operators, who use INWIT infrastructures for services that emit 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, proactively monitoring its possible developments and always acting in accordance with the legislation.

With regard to the development of mobile radio systems, and therefore also 5G, and the aspects of electromagnetic compatibility, it is important to remember that the current limits of emitted power, which Italian legislation has set with a wide margin of safety<sup>8</sup>, 100 times lower in terms of power density (0,1 W/M2) than the limits laid down from the European recommendation 1999/519/EC, and adopted by the principal European countries such as Germany, France, Spain and United Kingdom.

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

5G, like all telecommunications systems, works by electromagnetic waves that propagate between a base radio 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 the Wi-Fi system (ANCI dossier 2020 and UNCEM and ANFoV dossier 2020 on 5G technology). 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 exposure limits have been established to protect these impacts by the International Commission on Non-ionizing radiation Protection (ICNIRP), an organization officially recognized by the World Health Organization (who) and the International Labor Organization (ILO).

In March 2020 the ICNIRP published an update of the 1998 guidelines, which, in addition to some technical variations, substantially confirmed what has already been reported in the guidelines. evidence of the fact that a further 22 years of scientific research have not revealed any effects of exposure to the electromagnetic field that require a downward revision of the exposure limits.

<sup>8</sup> ISS 5G and Health.



Italy has applied the precautionary principle to provide greater protection against the long-term effects of electromagnetic fields on man, considerably lowering, compared with what Europe suggests in line with ICNIRP, the maximum level to which one can be exposed in his homes.

This leads to significant difficulties in deploying ultra-wideband mobile networks.

According to a study conducted in 2019 by Politecnico di Milano and CNR, the average percentage of installations in which the current limits of Italian regulations do not allow for 5G expansion is 62 percent, which corresponds to 27,900 installations for which re-engineering interventions such as, for example, raising the height of antennas with taller poles, or new sites need to be considered.

## SUPPLY CHAIN

GRI 2-6, 414-1, 308-1

INWIT's purchase of goods and services defines how it purchases and their responsibilities and is based on the following principles:

### Transparency of rules and decisions

The competitions are promoted in 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 there are no ongoing insolvency proceedings or acts of prejudice relating to the Company and/or legal representatives/directors, serious administrative sanctions, including the accident prevention and occupational hygiene penalties issued by the appropriate supervisory bodies, at its own expense. conflicts of interest.

### Separation of roles

To be highlighted between the different operational and decision-making phases to ensure correct and transparent activities and to

prevent conditions of individual advantage in the carrying out of the purchase activities.

### Correctness

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, documents proving the outcome of the Control

activities and verification of products/services delivered/supplied/installed by suppliers are available from the competent company functions, the results of which are conditional for payments.

In 2022, with the aim of further strengthening the principles on which the procedure for the purchase of goods and services is based, INWIT undertook the following new actions:

- It introduced the concept of multi-functional evaluation in the most strategic tender processes, to give greater transparency to the technical evaluation phase.
- Has initiated a training plan on the procurement process for goods and services that is open to all company staff.

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 is constituted by companies that produce apparatuses used for INWIT infrastructures such as air conditioners, electrical panels, radio signal distribution apparatuses.

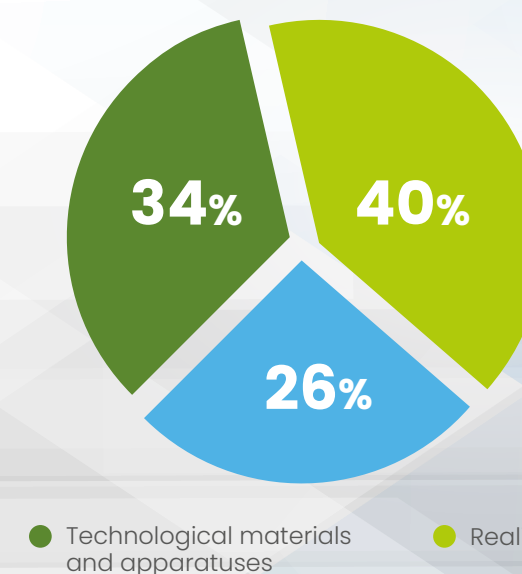
During 2022, INWIT extended its supply chain to 433 suppliers, compared to 414 in the previous year. Total expenditure for 2022 was over 147 million euro, distributed as follows:

- 40% implementation and maintenance services of radio base stations (SRB).
- 26% professional services.
- 34% suppliers of technological materials and equipment.

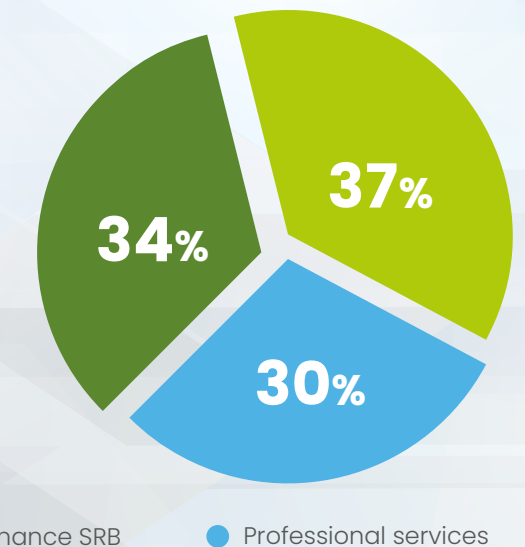
In 2022, as in the previous year, **99% of the expenditure is local**, that is, it comes from Italian suppliers (the remaining 1% is from foreign sources).

Subcontracting contracts concluded in 2022 increased to 378 sub suppliers, compared to 199 in 2021. Below is the detail of expenditure in monetary value compared to the three macro-categories of services and goods.

Supplier expenditure at 31.12.2022



Supplier expenditure at 31.12.2021



● Technological materials and apparatuses ● Realization and Maintenance SRB ● Professional services

## SUPPLY CHAIN SUSTAINABILITY

In line with the commitments of the Sustainability Plan and with the objective of extending the sustainability principles to the entire supply chain, INWIT includes, in all supply contracts, specific clauses related to ESG risks, also reported in the Terms & Conditions standards of purchase orders. Within the procedure for the purchase of goods and services, INWIT has declined sustainability criteria, aimed at increasing the level of sustainability and the circularity of its supplies. The allocation of these criteria is considered to be a premium element in the tender award phase.

### Reward criteria for suppliers who have:

- ▀ Health and Safety Management Systems (ISO 45001);
- ▀ Low environmental footprint (asking for documentary evidence such as an LCA study on 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, for example asking for guarantees of origin issued by the Energy Services Manager (GSE);
- ▀ Geographical proximity to the place of the service and with short supply chain.

### Reward criteria for products:

- ▀ Intended as a 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.

Among the selection requirements in the questionnaire, the request for certification on social and environmental issues was included among others. In addition, all suppliers are required to sign the INWIT Pact of Ethics and Integrity, with which they are committed to respect for the environment, the protection of human rights and labor standards and the fight against corruption.

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.

In particular, 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. Only after the technical-economic checks, the negotiation with the counterparty and the checks relating to the Related parties' procedure and the Golden Power regulation can the relations with the suppliers be formalized.

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 request for the insertion of a new supplier is completed to start the qualification process and/or associations to new qualification objects, as well as to verify the qualification status of a supplier. INWIT is also equipped with a Vendor Rating policy, applied experimentally on two strategic supply sectors – that of the realization and design of the base radio stations – with the purpose of indicating the guidelines for monitoring and evaluating, through the Vendor Rating Index, performance performed by qualified suppliers.

These guidelines allow, among other things, to improve the quality of services, supplies, works and works, to monitor and improve the supply chain, and to promote long-term value creation. The Vendor Rating, in fact, 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.

Moreover, 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 analyzes carried out on its suppliers in 2022, 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%.

Since 2022, INWIT has also begun to submit an ESG questionnaire to its suppliers with specific questions on sustainability aspects, declined to the three areas: Environment, Social, Governance, to assess its supply chain on sustainability issues and to raise awareness of the strategic path taken toward creating a sustainable business model that spans the entire value chain.

The ESG questionnaire, completed on a voluntary basis, involved 128 suppliers, including 8 new 2022 suppliers, with a weight equal to 66% of the total INWIT 2021 expenditure.



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 suppliers with high sustainability risk, therefore, classification by category is necessary, starting from the macro-categories described above, suppliers of services for the realization and maintenance of radio base stations, suppliers of professional services, suppliers of materials and technological equipment.

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 considered to be “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:**

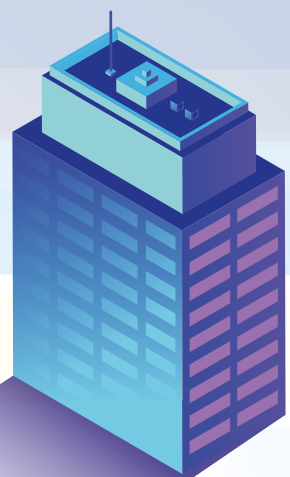
- ▶ ISO 14001 or EMAS;
- ▶ ISO 45001;
- ▶ ENVIRONMENTAL BALANCE SHEET OR SUBSTITUTION BALANCE SHEET;
- ▶ COP (Communication on progress – Global Compact).

**B Governance and Corruption risk:**

- ▶ Code of Ethics and Conduct;
- ▶ MOG 231;
- ▶ Formalized Internal control system ex Lege 262/2005;
- ▶ Internal anti-corruption policy or other public documentation;
- ▶ ISO 37001.

However, 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, requirements for the identification and monitoring of strategic suppliers are being defined.





# HUMAN CAPITAL



## ORGANIC

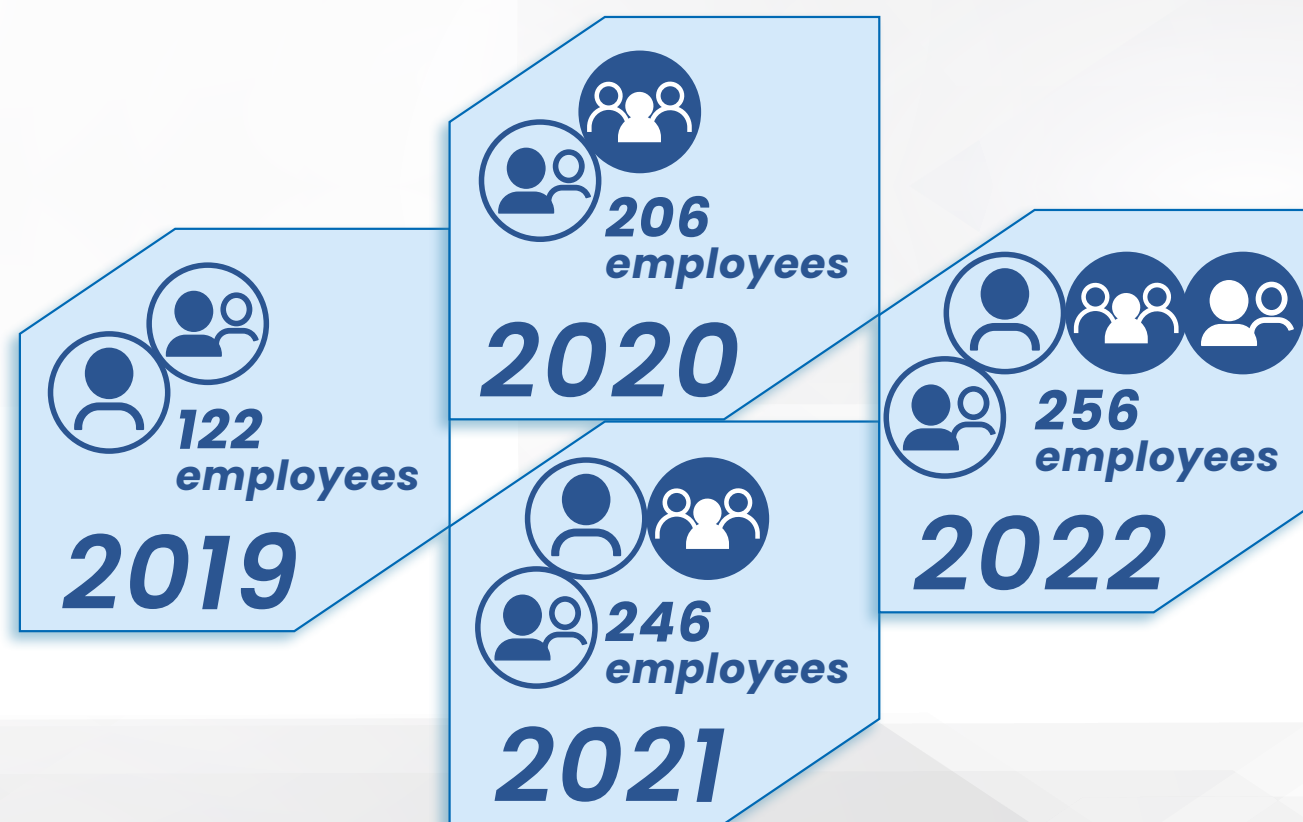


The involvement, well-being and development of people are one of the pillars of INWIT's sustainability strategy, knowing that a corporate culture focused on including and enhancing diversity will bring change to all stakeholders generating a positive impact both within the company and on the company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

## INFORMATION ABOUT EMPLOYEES AND WORKERS

GRI 2-7, 2-8, 2-21, 405-1, 405-2

As of December 31, 2022, INWIT has 256 employees, up 4% compared to the previous year, the result of a company's hiring policy and confirmation of a positive trend from 2019 to the present.



In 2022, the 99,6% of the company's population had permanent and full-time contracts, with only one employee on a part-time contract and one employee on a fixed-term contract.

The geographical distribution of INWIT infrastructures is also reflected in the territorial distribution of personnel, with 81 employees based in Northern Italy, 132 in Central and Sardinia and 43 in Southern Italy and Sicily. INWIT employees over the age of 50 account for 51% of the total company population, those in the 30-50 year group for 46%, and those under the age of 30, the remaining 4%.

The following tables show the total number of employees by geography, gender, and open-ended or fixed-term contract, and by gender and part-time or full-time contract. INWIT has no non-employees.

Table 3 GRI employees 2-7.

Total number of employees broken down by contract type (indeterminate and determined time) by geographical area and gender							
31.12.2022							
	North		Center and Sardinia		South and Sicily		Total
	Men	Women	Men	Women	Men	Women	
Permanent	51	30	74	57	32	11	255
Temporary	0	0	1	0	0	0	1
<b>Total</b>	<b>81</b>		<b>132</b>		<b>43</b>		<b>256</b>

Total number of employees broken down by contract type (indeterminate and determined time) by geographical area and gender							
31.12.2021							
	North		Center and Sardinia		South and Sicily		Total
	Men	Women	Men	Women	Men	Women	
Permanent	48	26	72	54	32	11	243
Temporary	0	0	1	0	0	0	3
<b>Total</b>	<b>74</b>		<b>129</b>		<b>43</b>		<b>246</b>

Table 4 GRI employees 2-7.

Total number of employees broken down by part-time and full-time, by gender							
	To 31 December 2021			To 31 December 2022			Delta 2022/2021
	Men	Women	Total	Men	Women	Total	
Part-time/Full-time							
Full-time	154	91	245	158	97	255	4%
Part-time	0	1	1	0	1	1	0%
<b>Total</b>	<b>154</b>	<b>92</b>	<b>246</b>	<b>158</b>	<b>98</b>	<b>256</b>	<b>4%</b>

In 2022, the ratio between the highest total wage within the organization and the median value for all employees was 12,2, down 22% from the previous year, while in terms of the annual percentage change in the two wages, the ratio was 5,26.

Table 5 Total annual remuneration report GRI 2-21.

	2021	2022	delta
<b>Annual total salary rate</b>	15,6	12,2	-22%

Overall, the company's population in 2022 consisted of 7% of executives, 31% of executives and 62% of employees. Below there are the two tables, relating to 2022, with details of employee percentages by professional category and gender and by professional category and age group respectively.

**Table 6** Detail of employees by profile, age group and GRI gender 405-1.

Percentage of employees by job category and gender				Percentage of employees by profile and age group				
Number of people	To 31 dicembre 2022			Number of people	To 31 dicembre 2022			
	Men	Women	Total		<30 years	30-50 years	>50 years	Total
Managers	84%	16%	<b>7%</b>	Managers	0%	26%	74%	<b>100%</b>
Executives	74%	26%	<b>21%</b>	Executives	0%	37%	63%	<b>100%</b>
Employees	59%	41%	<b>73%</b>	Employees	5%	50%	45%	<b>100%</b>
<b>Total</b>	<b>56%</b>	<b>44%</b>	<b>72%</b>	<b>Total</b>	<b>3,5%</b>	<b>45,7%</b>	<b>50,8%</b>	<b>100%</b>

Compared to 2021, the proportion of women in the executive role decreased from 20% to 16%, and in the executive role from 32% to 18%. Reverse trend in the employees category, where the proportion of women increased to 51% compared to 49% last year. The share of executives aged 30 to 50 also rose to 26%, from 20% in 2021, as well as the share of executives in the same age group, rising from 34% to 37%. The responsibility roles are covered for the 82% by men and 18% by women, while in 2021 they were 78% and 22%, respectively, as shown in the table below.

**Tabella 7** Number of managers per job category.

Managers				
	2021		2022	
Men	29	78%	28	82%
Women	8	22%	6	18%
<b>Total</b>	<b>37</b>	<b>100%</b>	<b>34</b>	<b>100%</b>

Employees in the protected categories are just under 3%. As a study qualification, the 62% of INWIT employees have a degree, the 38% a diploma.

Also, in 2022, targets for the Sustainability Plan were included in the MBO system of the Director General and of all the management incentivized, with a weight of the ESG component equal to 15% of the total.

For further detailed information on the ratio between basic salary and overall female and male salary, in addition to the employee percentages by profile, age group and gender, please refer to the tables in the Annex.

## THE RECRUITING PROCEDURE

During 2022, INWIT finalized a procedure that governs the management of the **Recruiting, Selection and Recruitment activities of executive and non-executive staff** and ensures the governance of the entire process, monitoring its efficiency and effectiveness.

Preliminary to the initiation of the recruiting and selection process are the **Business Strategy**, with particular reference to the drivers for the development/acquisition of new skills in line with the company's business, and the evidence derived from the Workforce Strategy, in terms of INWIT's Numerical Variation Plan and definition of the skill acquisition frames identified when defining the dedicated function budget.

### Process KPIs

- Time and numerical respect
- Hiring rate
- % women in selection
- Time to hire
- Offer acceptance rate

The process begins with the activities of gathering the demand from the dedicated HR function and ends with the aptitude selection that includes a line interview carried out by the Business Partner of reference and the Line Manager identified in the planning phase. In order to determine the ranking of the candidatures, we proceed with an online assessment that is diversified according to the profile sought and the target with different tests to highlight personality, detection of motivational factors, cognitive skills, digital skills, managerial skills, etc. The selection of new resources is carried out respecting equal opportunities: In fact, the diversity of people is a fundamental wealth of the patrimony of company skills and is a resource to favor and accelerate the processes of innovation and cultural change.

INWIT, in partnership with LUISS University Guido Carli, has also awarded scholarships for students enrolled in stem degree courses, with the aim of mitigating the mismatch between the demand for digital professionalism, which is now purely male, and the provision of human capital on the labor market. The company has also foreseen the introduction of strict inclusion KPIs within the selective process even if managed by external recruitment agencies. In 2022, women included in the selection process were 45,8%, up 40% from 2021.

## RECRUITMENT AND TERMINATION

GRI 401-1

The recruitment rate for the year 2022 was 14%: INWIT has included a total of 35 people, of whom 66% are aged between 30 and 50, 17% are over 50 years of age and the remaining 17% are under 30. The 46% of the people who entered the company in 2022 are female: these new entries lead the proportion of women in the company to exceed 38% of the total number of employees. There were 25 exits in 2022, of which 60% were men and 40% women, 60% were employees between the ages of 30 and 50, 28% were over the age of 50, and 12% were under the age of 30. Details of the recruitment rate and turnover are shown in the attached tables.





## OUR PEOPLE, THEIR WELL-BEING, DEVELOPMENT AND VALORISATION

### DIVERSITY AND INCLUSION

GRI 406-1

In line with the initiatives already launched in the previous two years, INWIT is committed to identifying a plan of intervention that, based on the feedback and contributions collected by Team D&I and the Focus Groups, will develop new initiatives aimed at strengthening the well-being of people and their employee experience. In 2022, INWIT took part in the **4Weeks4Inclusion** intercompany event, with an event entitled "no one left BEHIND: MOBILE CONNECTIONS FOR SOCIAL INCLUSION And EQUITY". As an enabler of digitization, in support of mobile operators, INWIT has always been committed to reducing territorial, social, and economic barriers with a view to inclusion and development. With this initiative, INWIT reaffirms its commitment to reducing the digital divide in the most disadvantaged territorial communities, contributing to the fight against social inequalities and guaranteeing equal opportunities for the whole country.

#### Freedom of expression

The Diversity & inclusion Policy also aims to make the workplace an inclusive, welcoming, and plural environment in which freedom of expression must always be guaranteed, and in which each one can feel free to manifest his or her own nature and authenticity without any form of discomfort. Failure to comply with these principles may result in an analysis by the control bodies of the behavior carried out and may trigger sanctions to protect those who have been offended or affected by such behavior.

It should be noted that in 2022 there were no established incidents of discrimination within the Company.

### EMPLOYEE ENHANCEMENT AND DEVELOPMENT

INWIT uses an integrated human development system aimed at assessing and enhancing both performance and potential. In particular, the Performance Management System, in supporting the delivery of the strategic plan, keeps the skills and behaviors of the people aligned with the evolution of the company, pursuing the dual purpose of development, and strengthening of the corporate identity. The evaluation system operates on an annual basis and is focused both on achieving the objectives and on the skills put in place to achieve them. All employees are required to perform bottom-up, top-down, and cross-sectional assessments.

Figure 8 Competency Model.



### CORPORATE WELFARE

GRI 401-2

INWIT ha un ricco programma di iniziative di Welfare per i propri dipendenti, in coerenza con i propri valori ed obiettivi, a conferma della centralità delle risorse per il raggiungimento dei propri obiettivi.

#### The main initiatives offered by INWIT during 2022 were:

- ▶ partial reimbursement of **the monthly fee for nursery school or kindergarten**, and reimbursement of university fees for children of employees.
- ▶ access to **business loans**;
- ▶ confirmation and extension of **smart working**.
- ▶ **ASSILT** Association for supplementary health care, which allows to provide, for members and beneficiaries, supplementary services to those provided by the National Health Service, including, in collaboration with public health facilities, the carrying out of research, cognitive surveys and group and individual health prevention interventions, and the promotion of health education initiatives.
- ▶ **ASSIDA** Association for Integrative Health Care Business leaders, provides executives with reimbursements for health benefits that supplement those provided by the National Health Service.
- ▶ **TELEMACO** Supplementary National Pension Fund for workers of companies in the telecommunications sector, has the objective of ensuring that associated workers maintain their standard of living also at the time of retirement, by creating a supplementary pension to the public. It is intended for workers, employees and managers of companies applying the national telecommunications contract, for permanent, apprenticeship and placement 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 for the family, 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 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 families.
- ▶ **Check-up Campaign**.
- ▶ **INWIT WELFARE4 PEOPLE**: As a result of what has been defined by the second level of business bargaining, and to maximize the capacity of employees to spend according to the tax benefits provided by the law, a new welfare portal – INWIT WELFARE4PEOPLE – dedicated to people, has been introduced. It has converted the result Award into flexible benefit, giving everyone the choice between Welfare goods and services, while enhancing the private and working life of our people.

#### Compensation

The remuneration policy aims to support the achievement of business objectives, promote the creation of value for shareholders and the continuous improvement of company performance. INWIT has a remuneration structure aligned with market best practices, strengthening the engagement of staff, and recognizing the criticality of the role and the professional contribution. Starting in 2021, INWIT started a structured process aimed at collecting and deepening the issues of interest in remuneration expressed by shareholders and proxy advisors. At management level, the short-term variable incentive system reserved for all managers of formalized organizational structures, based on economic/financial and quantitative objectives represented in the industrial plan, was followed.



During 2022, the 3rd cycle of the LTI 2020-2024 plan approved in 2020 was launched, reserved for the General Manager, Key Managers and other managers who are responsible for critical roles for the Company. In support of 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.

### Result Award

The three-year agreement (2021-2023) for the “post-merger” INWIT result Prize is still in force. Agreement that foresees an increase in the premium values of 20% in three years compared to the previous “pre-merger” result Prize and the alignment of the performance parameters with the main economic and financial objectives of the Company.

### Widespread share ownership plan

In 2020, an INWIT diffuse equity plan was launched, aimed at all employees, with the aim of favoring the “active” participation of people in the Company’s results and investing in the sense of identity. This opportunity, to which 98% of INWIT’s people joined, consisted of a first free allocation of 100 shares for each employee, and an offer to purchase shares at a price discounted of 10% compared to market value, up to a maximum of 200 shares per employee. About 80% of the people have chosen to invest further in INWIT, taking advantage of the discounted purchase, and 85% of the people who have invested have bought the maximum available stock.



## EMPLOYEE SKILLS DEVELOPMENT INITIATIVES

### TRAINING

GRI 404-1, 404-3, 205-2 (parziale)

During the 2022, the total training hours provided were just over 4.900, down from the more than 15.500 hours last year, when the New skills Fund approved by the National Agency for Active Labor Policies (ANPAL) was activated. Below you can find the details of the hours by training type.

**Table 8** Details of the hours by type of training.

Hours per type of training	
COURSE	HOURS
<b>Risk &amp; compliance training</b>	<b>320,5</b>
▸ Of which Antitrust	29
▸ Of which Compliance and Business Ethics	35
▸ Of which Privacy and Data Protection	70,5
▸ Of which cyber security	186
<b>Soft skills training<sup>9</sup></b>	<b>1.860</b>
<b>QHS&amp;E training<sup>10</sup></b>	<b>2.738,5</b>
<b>Total training hours</b>	<b>4.919</b>

It should be noted that in 2022, training on anti-corruption policies and procedures was aimed at new recruits, involving in particular 28 employees.

The table below shows the number of training hours by gender and job category. During 2022, on average for each employee, 19 hours of training were provided.

The 100% of employees are subject to periodic performance and career assessments, net of employees who have entered less than 6 months ago and those on maternity and paternity. In 2022, 235 employees were evaluated.

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

Number of hours	2021						2022					
	Hours men		Mean hours/ men		Hours Women		Hours men		Mean hours/ men		Hours Women	
	Average total hours	Total hours	Average total hours	Total hours	Average total hours	Total hours	Average total hours	Total hours	Average total hours	Total hours	Average total hours	Total hours
Managers	687	43	163	41	851	36	320	21	50	25	370	19
Executives	2297	72	651	43	2.947	63	522	13	193	13	714	13
Employees	8.052	76	3.864	53	11.916	67	2.300	23	1.536	19	3.836	21
<b>Total</b>	<b>11.036</b>	<b>72</b>	<b>4.677</b>	<b>51</b>	<b>15.713</b>	<b>64</b>	<b>3.141</b>	<b>20</b>	<b>1.778</b>	<b>19</b>	<b>4.919</b>	<b>19</b>

<sup>9</sup> It is specified that in the calculation the hours of training in soft skills, English language and training and development have been considered.

<sup>10</sup> It is specified that in the total the training hours provided by the plan, developed on two lines, were taken into account:

- Training on the integrated management system, with sessions dedicated to the individual schemes (ISO 45001:2018, ISO 14001:2015, ISO 9001:2015 and ISO 50001:2018);
- Specialized training on safety and environmental issues recurring in operational activities (waste management at INWIT sites, land and rock excavation management, specific environmental aspects management – FGAS, asbestos-containing materials, noise signaling, safety and prevention in work entrusted to third parties, Environment & Security as a sustainable development objective and temporary and mobile cantons (Titles I and IV of D. 81/08).



During the 2022 22 employees were promoted, 8 more than the previous year: of these, 3 are managers, 7 are managers and 12 are employees. The table below shows the number of employees promoted by job category and gender.

Table 10 Promotions.

Employees who have received promotions throughout the year				
	december 31, 2021		december 31, 2022	
	Men	Women	Men	Women
Managers		1	2	1
Executives	1		7	
Employees	8	4	7	5
<b>Total</b>	<b>9</b>	<b>5</b>	<b>16</b>	<b>6</b>

## EMPLOYEE INITIATIVES

Among the initiatives that INWIT addressed to its people in 2022, the following are highlighted:

### Introduction Cloud solution of HR management and participation in the HR Innovation Award – HR Innovation practice Observatory, Polytechnic of Milan

- INWIT has decided to focus on the development of digital tools, aware that an innovation-oriented corporate culture will improve the well-being of people, generating a positive impact within the company and on society. For this reason, INWIT has equipped itself with a new **HRMS system** to better meet the new needs of people Strategy and, at the same time, improve the employee experience.

In fact, INWIT has adopted a cloud solution for the management of human capital, focused on the main processes: Analytics, Performance & Goals Settings, Compensation, Recruiting & Onboarding, Learning, Succession & Career.

The project, called *"Bee My Journey"*, was presented at the **HR Innovation Award** of the Milan Polytechnic, winning second place for the "process Optimization and digitization" category.

### Startup development initiatives (INWIT4Talent)

- In 2022, specific programs were launched to enhance the skills and valorisation of the company's internal talents, with the aim of carrying out an evaluation oriented to the further possible development of the people involved. This allows the company, on the one hand, to know the potential of the basin identified and to activate the initiatives necessary to orient and accelerate its development; on the other hand, the people involved are required to assess their leadership skills and, at the same time, to acquire the self-awareness needed to be architects and managers of their career path.

- Start of a redesigning project of **the Performance Management process** whose aim is to define a simple, effective, and measurable process to allow the development of one's own people toward new priorities and business challenges in an always growing, stimulating and inclusive environment. In 2023 the HR function will be engaged in the re-engineering and implementation of the new Performance Management process, as shown below:



### Career Day: Politecnico di Torino, Tor Vergata, LUISS; LUISS Scholarships

- INWIT is active in attracting talent to the market through targeted employer branding actions. In 2022, in particular, INWIT took part in career days at LUISS Guido Carli, the University of Tor Vergata and the Politecnico di Torino. The initiatives for the granting of scholarships for students and students in the degree courses of business interest should also be included in the wider context of attraction.

### Participation in UNICATT SWAP laboratory

- In 2022, the HR Directorate participated in the research project of the Catholic University of Milan called "SWAP" (Smart working, Business Welfare and Organizational participation).
- The objective of the laboratory was to deepen, from a high point, the relationship between the forms of organizational participation and the characteristics and performance of the company welfare plans, on the other hand, the relationship between the mechanisms of organizational participation and the structuring of Agile work.

### BONUS INWIT

In December, taking advantage of the opportunities provided for by current legislation, and with the aim of witnessing the proximity of the Company to all employees, and their families, the bonus INWIT of the value of 1.000 euros was recognized to spend in shopping vouchers and purchases by the whole of 2023. This amount represents INWIT's response to the economic downturn, in contrast to high living and rising inflation in consumer goods.

### INWIT DAY

Within the framework of the internal listening and dialog initiatives and downstream of the engagement survey results, carried out between the end of 2021 and the beginning of 2022, in December 2022 the 1st INWIT DAY has been realized. The corporate event aimed at strengthening corporate identity and a sense of corporate community, was an opportunity for the Leadership Team to share with employees the results achieved and the goals for the future, it leaves an important reflection on the concept of "Leadership" and on the sense of personal responsibility as a reference value in the company's work.



## INDUSTRIAL RELATIONS

GRI 2-30

The ongoing dialog with trade union organizations continued throughout 2022, leading to the signing of a new agreement between INWIT and the national, territorial OO.SS and the RSU. Among the main themes of the agreement are the new Result Prize described above, a plan to optimize the company's premises and the establishment of a committee for the participation of workers.

In addition to the prize, an additional welfare share is planned for the second consecutive year to be spent on welfare goods and services. 2022 was the year of the start of the smart working contracts, which foresees the execution of the work mainly from remote, with 8 days per month of work on site.

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, aimed at improving the business operating model and increasing productivity.

In INWIT, all employees are covered by collective bargaining agreements and 11% of employees are registered in the Syndicate, with which a comparison takes place 2 or 3 times a year.

In addition, INWIT, since the agreements with the union and in accordance with the applicable law, in the event of a company reorganization, undertakes to provide useful notice asset out in the National collective Labor Agreement for personnel employed by undertakings operating telecommunications services.



## HEALTH AND SAFETY AT WORK

### THE HEALTH AND SAFETY OF EMPLOYEES

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

Innovation, sustainability, and people care are key values for INWIT's success. During 2022 too, Covid 19 affected many employees, but thanks to the specific actions that have been implemented in a timely manner since the beginning of the health emergency, and which have been extended to date, for the protection of personnel, no cases of contagion have been detected in the workplace.

#### Health and safety training

During 2022 the process of compulsory training was completed in accordance with the Legislative Decree no. 9 April 2008, n. 81 and the State-Region Agreements 2011 and 2016 of all personnel under the company according to the personnel risk profiling in two levels, low and medium.

In addition, to increase the possibility of training, 8 resources have been identified which have completed the training course for safety trainers.

The table below shows the total number of hours of training given in health and safety according to D. Lgs 81/08.

**Table 11** H&S training.

H&S training hours			
COURSE	Duration (h)	Sessions	Hours delivered
Basic training	4	13	52
Specific course Low risk	4	96	384
Security Executives Course	16	6	96
RSL Update Course	8	1	8
<b>Total</b>	<b>32</b>	<b>116</b>	<b>540</b>

### OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM

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

INWIT, in line with the sustainability path undertaken, decided to equip itself, by 2024, with a Health and Safety Management System certified according to ISO 45001:2018, integrated with environmental issues according to ISO 14001:2015. During 2022, the SSL and environment management system, which was launched last year, was further integrated with the quality management system<sup>11</sup>.

In view of the new organizational structure, the INWIT risk Assessment Document has been revised after a careful assessment of the processes to take into account the operational changes that have taken

<sup>11</sup> In 2021 the whole body of documents was prepared, which includes the analysis of the organization, the context, the processes, the risks and the opportunities, as well as the definition of 19 procedures, 12 operating instructions and a guideline.



place<sup>12</sup>. As far as personnel are concerned, two risk profiles have been defined on the basis that the processes in which the health surveillance process operates and has been completed.

The “Management of injuries, accidents and near misses” procedure was extended to Contractors in 2022, so all events are analyzed, whether they cause injury or illness (injury), or have only the potential to do so (non-injury or near miss), as well as any dangerous behavior.

The procedure for health and safety audits and controls defines how to carry out the checks to be carried out in order to ensure the maintenance of safety levels, both at the sites and at the premises, in relation to work environments and equipment, management and control of contractors, verification of the work of professionals and management of the yards.

In this latter respect, the activities carried out under the construction site scheme under Title IV, or Title I contract by professionals and external contractors were the subject of a field audit campaign through audits.

During 2022, this activity was carried out by the HSE function directly and through the inspectors of a dedicated third-party company: A total of about 500 audits were carried out on the ground. 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 sites.

## INJURIES OF EMPLOYEES AND EMPLOYEES

GRI 403-9

In 2022, there were 2 accidents in itinere by private means, an accident during the activity of smart working and an accident during the lunch break on occasion of a work trip. No near misses occurred. An accident was also recorded for a contractor<sup>13</sup>.

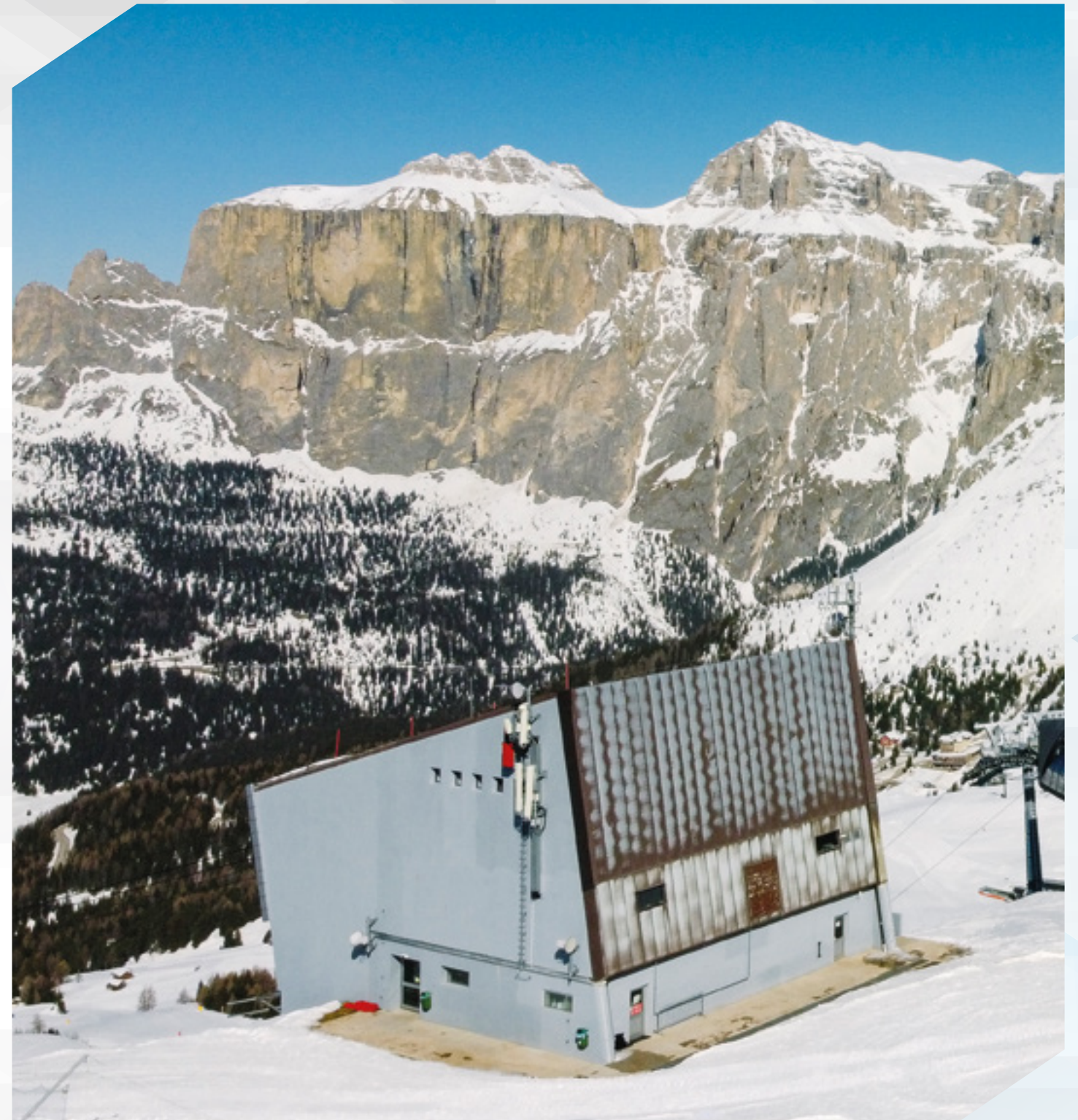
The absenteeism rate for INWIT employees in 2022 was 1.6%. For the 2 accidents in 2022, the prognosis days were 22. The table below shows data on employee injuries in 2021 and 2022.

**Table 12** Accidents at work (GRI 403-9).

Accidents at work		
No cases	2021	2022 <sup>14</sup>
Number of accidents at work that can be recorded <sup>15</sup>	0	2
▶ of which, the number of deaths caused by accidents at work	0	0
▶ of which, accidents at work with serious consequences (excluding deaths)	0	0
▶ <b>Rate of accidents at work adjustable<sup>16</sup></b>	<b>0</b>	<b>1,19</b>
▶ <b>Rate of days lost due to injury<sup>17</sup></b>	<b>0</b>	<b>13,14</b>
▶ <b>Death rate due to accidents at work</b>	<b>0</b>	<b>0</b>
▶ <b>Rate of serious accidents at work</b>	<b>0</b>	<b>0</b>

<sup>12</sup> The significant changes made with respect to the last edition concern the inclusion of the new organization and updated organization chart of safety executives and managers in accordance with Legislative Decree 146/2021; introduction of the risk assessment of installations located in tunnels;

- Inserted the new heat map matrix of risks adopted in 2022, consistent with combined Assurance with the updated version of ERM heat map;
- Updated the offices and inserted the emergency management plan on the premises of Piazza Trento and the evacuation test.



<sup>13</sup> The injury is defined as serious as it is a lesion to the neck vertebrae, with a prognosis of 183 days not yet dissolved.

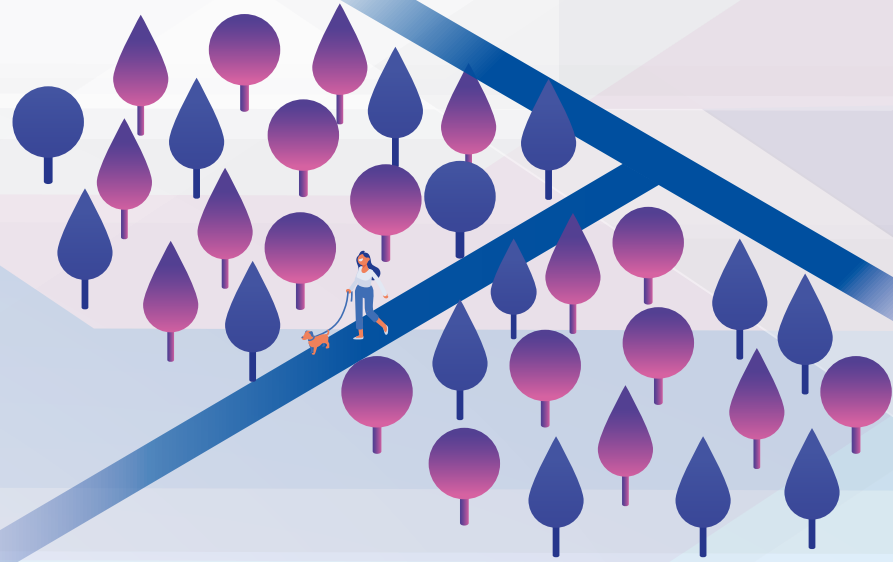
<sup>14</sup> From the total of accidents, 2 accidents in itinere occurred by private means, in line with the provisions of the GRI Standards, were not considered.

<sup>15</sup> Injuries occurring during working hours on the employees perimeter.

<sup>16</sup> The rates are calculated by dividing by each type of accident (recordable, death and serious) the number of hours worked (in 2021 hours worked 359.820 and in 2022 hours worked 334.900) multiplied by a multiplier in the INWIT case, taking into account the size of the company, 200.000 (corresponding to 50 working weeks x 40 hours x 100 employees).

<sup>17</sup> The rate of days lost by accident was calculated as the ratio between the prognosis days for the 2 accidents and the total hours worked, multiplied by 200.000 (corresponding to 50 working weeks x 40 hours x 100 employees).

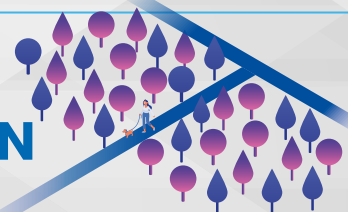




# NATURAL CAPITAL



## ENVIRONMENTAL PROTECTION



In line with the objectives of reducing environmental impacts, set at Community level in the European Green deal and confirmed by the National Plan of Recovery and Resilience, for the development of an increasingly circular and climate-neutral economy, INWIT is committed to implementing actions aimed at maximizing the efficiency in the use of resources (materials and energy) and minimizing the environmental impacts of its activities.

One of the most challenging targets of INWIT's sustainability plan is the achievement of the "Carbon Neutral" as of 2024, the zero emissions for which INWIT is responsible through a strategy to reduce and offset residual emissions.

In order to ensure effective management of these aspects, INWIT has launched a path for the definition and implementation of an Environmental Management System, to be adopted on the basis of the ISO 14001:2015 standard, and an Energy Management System, in line with the ISO 50001:2018 standard, With the objective of ISO standard certification of both systems (in 2023 of the Energy Management System and in 2024 of the Environmental Management System).

During 2022 the environment management system was further integrated with the quality management system, already ISO 9001:2015 certified.

In this direction, with the integration of the quality management system, the new Quality, Health, Safety and Environment Policy has been issued, in which the following environmental commitments have been established:

### Quality, 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 on greenhouse gas production, through the production and purchase of energy from renewable sources and the choice, optimization, and reduction of the refrigerant gases used;
- ▶ 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 use of resources and maximising the recovery and recycling of waste materials related to its activities. Actions have therefore been taken to monitor and trace these materials, as described in the paragraph "Circular Economy".

The management of energy-related issues is entrusted to a dedicated "Energy Management" function, which deals with the management of the active and passive cycle, the forecasting phase, the management of the lace, as well as the activities related to energy and carbon management.

As for water consumption, on the other hand, it relates only to the company's offices, where INWIT is renting and not managing the utilities, and for 2022 can be quantified as 5,437 cubic meters, based on what is stipulated in the lease agreement.

## ENERGY MANAGEMENT

GRI 302-1, 302-3

### ENERGY MANAGEMENT SYSTEM

Consistent with the commitments made in relation to the government and continuous improvement of its energy performance (set out in **the Energy Policy**), INWIT has implemented a set of strategies and rules for the rational management of energy carriers, considered significant within the company.

Pursuing this aim with a main focus on energy saving and efficiency, while always maintaining due attention to the sustainability of the interventions and to the economic and financial objectives consistent with the Company's industrial plan, were presented, during **the internal and third-party audit activities** (Stage 1 of ISO verification), the criteria behind the **Energy Management System** (EMS) implemented and being certified.

The availability of information, the involvement of human resources and the allocation of the "economic efforts" necessary for the implementation of efficiency measures, in line with the obligations assumed through Energy Policy, shall be guaranteed respectively:

- ▶ The **documentary body**, consisting mainly of:
  - ▶ **EMS manual** which formalizes the structure of the Energy Management System in compliance with the ISO 50001 standards, acting as a link for the remaining documents;
  - ▶ **Context analysis** with assessment of risks and opportunities related to INWIT's activities in the specific energy sector (also contextualizing the rational use of the relevant carriers), while respecting the needs/priorities of the stakeholders (stakeholders);
  - ▶ **Initial energy analysis report** which provides an energy photograph of INWIT's activities by identifying all the energy carriers present and the consumption associated with the specific areas/activities;
  - ▶ **Management procedures** (concerning the identification of significant energy uses as well as the training, audit, review, and procurement management activities) associated with processes that can influence, in some way, energy consumption, to be controlled and improved continuously, in accordance with the requirements of the ISO Standard mentioned above;
  - ▶ **Registers** (of applicable legislation, Energy Uses, performance indicators and energy saving opportunities) to assess regulatory compliance and the significance of the uses identified, keeping appropriate registration and functional tracking to identify opportunities for energy saving and efficiency;
  - ▶ **Energy Action Plan** which lists all actions to improve energy efficiency, approved and evaluated in advance in the opportunity Register.
- ▶ From **the Information, training and training activities** provided to the personnel able to generate, with their own activities, significant effects on the energy performance of the Company (thus adequately trained to acquire the competence necessary to ensure a correct application of the Energy Management System and the practices provided for therein), and to raise awareness among all employees on the relevant issues, thus also addressing the behavioral aspect required for the rational use of energy.
- ▶ From **the Budget Frames** assigned to the energy efficiency interventions described below.

During 2022, 6 “on Site” Energy Audits were carried out on specific sites identified for the diversified North, Central and South areas, to confirm the assumptions linked to the determination of energy carriers and their significant characteristics. The choice of sites analyzed derives from the results of the minimum “CLUSTERING” of the representative sites of the INWIT fleet grouped by “Model Site”, which can then be replicated for the purposes of the investigation carried out.

Finally, with the aim of guaranteeing and coordinating all the implementation, maintenance, and monitoring operations of the SGE with a view to continuous improvement, the first meeting of the set-up **Energy Management Group (Energy Team)** was held, which reference structure for both internal communication between functions and with the Leadership Team (High Management) regarding the Management System itself and its operation.

## ENERGY OBJECTIVES AND ENERGY EFFICIENCY ACTIONS

As foreseen in its Sustainability Plan, INWIT has defined a strategy aimed at specific objectives of energy efficiency and reduction of climate-altering emissions, within which the following actions have been identified:

### ► Photovoltaic systems for powering the base stations.

In 2022, 102 photovoltaic plants were installed with a total power of 405 KWp, in addition to the 124 kWp installed in 2021.

### ► Free Cooling” systems for Room/Shelter air conditioning containing the energy stations and active equipment of the hosted mobile phone operators.

In 2022, 670 Free Cooling systems were installed, which allow the use of external air for the conditioning of the environments where the operators' systems are installed in certain climatic conditions, and which allow an annual energy saving of 5.900 MWh.

### ► High Efficiency Current Rectifiers (HE - High Efficiency).

In 2022, 1,285 new high-efficiency current rectifiers were installed, which reduce the losses of transformation of the energy into direct current, as must be provided to operators who are hosted on sites, for an annual energy saving at a steady state of 3.580 MWh.



## ENERGY CONSUMPTION

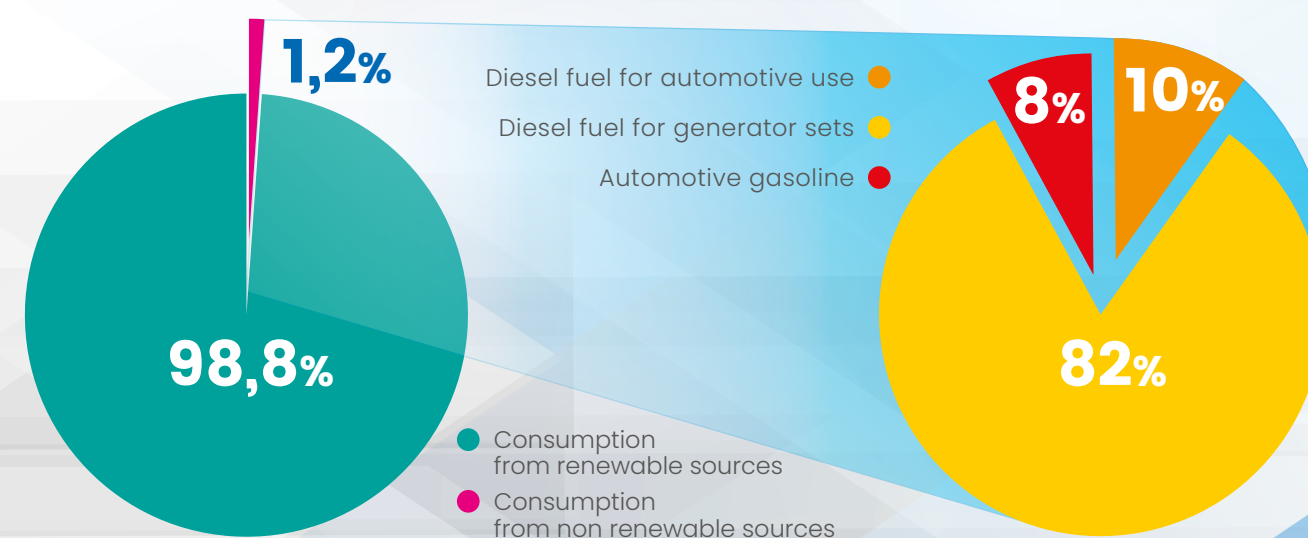
During 2022, INWIT's energy consumption amounted to 2.796.738 GJ, up 8% from 2021. Consumption is mainly due to the purchase of electricity for the supply of radio base stations (99% of the total). Smaller quotas are due to the use of fuels such as diesel for the supply of generator sets and gasoline and diesel for motor vehicles.

**Table 13** Energy consumed within the organization (GRI 302-1).

	UOM	2022	2021	% Delta
<b>TOTAL ENERGY CONSUMPTION</b>	<b>GJ</b>	<b>2.787.431</b>	<b>2.595.680</b>	<b>7%</b>
<b>NON-RENEWABLE FUELS OF WHICH:</b>	<b>GJ</b>	<b>31.768</b>	<b>25.390</b>	<b>25%</b>
► Diesel fuel for automotive use	GJ	3.195	2.936	9%
► Diesel fuel for generator sets	GJ	26.127	2.1853	20%
► Automotive gasoline	GJ	2.446	601	307%
<b>TOTAL ELECTRICITY CONSUMPTION</b>	<b>GJ</b>	<b>2.755.663</b>	<b>2.570.290</b>	<b>7%</b>
► From non-renewable sources	GJ	421	785.648	-100%
► from renewable sources	GJ	2.755.242	1.784.642	54%
<b>TOTAL CONSUMPTION FROM NON RENEWABLE SOURCES</b>	<b>GJ</b>	<b>32.189</b>	<b>811.038</b>	<b>-96%</b>

As regards fossil fuel consumption, INWIT consumed a total of 31.768 GJ in 2022, of which the largest share, 82%, was allocated to the supply of diesel fuel for the generator sets needed to power certain base radio stations. In the figure below, smaller percentages, equal to 10% and 8% respectively, represent the use of diesel and gasoline for the car park supply.

### Energy consumption





## CLIMATE STRATEGY

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

### INWIT STRATEGY AND COMMITMENTS

Responding to the needs of disclosure to its stakeholders and in accordance with its climate strategy foreseen in the Sustainability Plan, INWIT has decided to transpose the reporting framework defined by **the Task Force on Climate related Financial Disclosure (TCFD)** with the aim of collecting clear and comparable information, not only on the impacts of its activities on the climate, but also on the effects that climate change has on the company.

Based on the 11 recommendations of the TCFD, INWIT analyzed and summarized the key elements concerning the functions and processes by which it monitors and manages climate risks and opportunities, the climate targets set, and the relevant metrics for their monitoring, and the strategy defined to achieve them. For more information, see INWIT's first **TCFD Report** available online <https://www.inwit.it/it/i-nostri-valori-sostenibili/report-integrato/>

### SCIENCE BASED TARGET

In line with the emission reduction targets set out in the Sustainability Plan and Climate Strategy, and in order to strengthen the objective of achieving carbon neutrality by 2024, INWIT has chosen to join the Science based Target Initiative, initiative supporting the establishment of emission reduction targets based on climate science. In line with the level of decarbonization needed to achieve the goals of the Paris accord and limit global warming to well below 2°C above pre-industrial levels and pursue efforts to limit warming to 1,5°C.

By setting this target for reduction, 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 2022 SBTi approved the targets for reducing INWIT emissions, with a commitment to reduce GHG scope 1 and 2 emissions by 42% by 2030, and to reduce scope 3 emissions further and constantly.

### CDP CLIMATE CHANGE

As further evidence of its commitment, INWIT participated in the assessment questionnaire defined by the CDP (formerly the carbon Disclosure Project). INWIT was evaluated based on information on governance, impacts, risks, and opportunities related to climate change, receiving the results of the questionnaire in December 2022, maintaining a score like that of last year, equal **to (B) – Management**, with significant progress in the Business Strategy areas.

Targets and emissions reduction initiatives. For INWIT, the dissemination of its environmental data through the CDP Climate Change platform is a part of its climate strategy launched last year, which also passes through a transparent disclosure of its impacts.

## DIRECT AND INDIRECT CO<sub>2</sub> EMISSIONS

In accordance with the reporting requirements of GRI Standards 305 and, more specifically, according to the GHG Protocol Corporate Standard and the GHG Protocol Corporate value Chain Standard, in line with the carbon neutral commitment at 2024, INWIT is committed to managing its emissions, of which the first step is a complete reporting of the GHG inventory.

**The focus falls on all 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.

**Table 14** Direct and indirect emissions (GRI 305-1, 305-2, 305-3).

	UoM	2021	2022	Delta %
<b>Total Direct emissions – scope 1*</b>	<b>TCO<sub>2</sub>eq</b>	<b>2.693</b>	<b>3.028</b>	<b>12%</b>
Direct Fuel emissions – scope 1	TCO <sub>2</sub> eq	1.760	2.237	27%
Diesel fuel for automotive use	TCO <sub>2</sub> eq	204	226	11%
Diesel fuel for generator sets	TCO <sub>2</sub> eq	1.515	1.844	22%
Automotive gasoline	TCO <sub>2</sub> eq	42	167	301%
Direct emissions of refrigerant gases** – scope 1	TCO <sub>2</sub> eq	933	792	-15%
<b>Indirect emissions – scope 2 – Location based***</b>	<b>TCO<sub>2</sub>eq</b>	<b>191.772</b>	<b>195.124</b>	<b>1,7%</b>
Electricity from renewable sources	TCO <sub>2</sub> eq	133.154	195.094	47%
Electricity from non-renewable sources	TCO <sub>2</sub> eq	58.618	30	-100%
<b>Indirect emissions – scope 2 – Market based****</b>	<b>TCgO<sub>2</sub>eq</b>	<b>100.170</b>	<b>53</b>	<b>-100%</b>
<b>Indirect emissions – scope 3***</b>	<b>TCO<sub>2</sub>eq</b>	<b>68.589</b>	<b>49.958</b>	<b>-27%</b>
Goods and services purchased	TCO <sub>2</sub> eq	8.703	7.844	-9,9%
Capital goods	TCO <sub>2</sub> eq	25.028	27.541	10,0%
Indirect emissions for fuel and energy consumption	TCO <sub>2</sub> eq	31.424	11.470	-64%
Upstream transport and distribution	TCO <sub>2</sub> eq	202,7	318,5	57%
Rental assets upstream	TCO <sub>2</sub> eq	3.231	2.785	-14%
<b>TOTAL CARBON FOOTPRINT</b>	<b>TCO<sub>2</sub>eq</b>	<b>263.054</b>	<b>248.110</b>	<b>-6%</b>

\* <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2022>

\*\* DEFRA 2022, Refrigerant

\*\*\* ISPRA 2021, <https://www.isprambiente.gov.it/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 2022 correspond to 2.237 tCO<sub>2</sub>eq, while those from refrigerant gases to 792 tCO<sub>2</sub>eq., respectively, an increase of 27%, due to a higher use of cars, and a reduction of 15%, compared to 2021.

As far as indirect emissions related to electric power consumption of the Scope 2 type are concerned, INWIT carries out the analysis both with the Market Based (MB) approach, which attributes a zero-emission factor of CO<sub>2</sub>eq for energy consumption deriving from renewable sources, and according to the Location Based (LB) approach, this takes into account the average emission factor of CO<sub>2</sub>eq of the national electricity grid. The table above shows the details of the energy emissions generated by INWIT during the two-year period 2021/2022.

During 2022, Scope 2 LB emissions increased by 1,7% compared to 2021, while MB emissions were almost zero compared to the previous year, thanks to the 100% supply of electricity from renewable sources. During 2022, INWIT monitored Scope 3 emissions related to the transport of purchased goods and products, and emissions related to additional categories under the GHG Protocol: Goods and services purchased, Capital goods, indirect emissions related to energy consumption, upstream transport and distribution, upstream leased goods. Total indirect emissions – scope 3 in 2022 amounted to 49.958 tons of CO<sub>2</sub>e, compared to 68.589 in 2021, a reduction of 27%.

The calculation of the emissions linked to the transport of goods and materials supplied for the realization of operational and maintenance activities, was realized by mapping for the first time, in addition to all the journeys made for the transport of the materials from the source of supply, passing through the distribution center of Maddaloni (CE), managed entirely by INWIT, also the transport from Maddaloni to the final sites where they are installed.

Considering the types of vehicles used and the corresponding emission factors, it was calculated that, in 2022, INWIT's transport activities for the supply of materials generated 318,5 tCO<sub>2</sub>eq, an increase of 57% compared to last year due to the increased observation area.

Indirect emissions related to fuel and energy consumption decreased by 64%, from 31.424 tCO<sub>2</sub>eq to 11.470 tCO<sub>2</sub>eq, mainly due to the supply of energy from renewable sources, which enabled so-called Well to Tank emissions to be cut.

Also, for the issues of leased assets, there were a decrease of 2.785 tCO<sub>2</sub>eq, compared to 3.231 tCO<sub>2</sub>eq in 2021.

In view of the achievement of the carbon Neutral target in 2024, thanks to the energy efficiency works already implemented by INWIT and previously described, INWIT has generated a steady saving of 2.617,5 tons of CO<sub>2</sub>eq. For photovoltaics, the 2022 production of the plants installed since 2021 has been considered, while for free cooling and rectifiers it has been considered the annual saving according to the investments made in 2022.

Table 15 Emissions avoided 2022.

Emissions avoided 2022			
Plant	UdM	Energy saving/ production	TCO <sub>2</sub> eq. Avoided
Photovoltaic	kWh	269.971	72,5
Free cooling	kWh	5.896.000	1.584
Current Rectifiers	kWh	3.578.725	961

By monitoring emissions related to activities and by comparing the carbon footprint with INWIT's turnover, as well as the number of sites, it can be seen that in 2022 the emission intensity (calculated with the location -based approach) It decreased to 232 tCO<sub>2</sub>eq/€ and 8,31 tCO<sub>2</sub>eq issued for each site, confirming the validity of the initiatives undertaken in terms of energy management.

Table 16 Emission intensity (Scope 1 + Scope 2 "Location Based").

Emission intensity (Scope 1 + Scope 2 "Location Based")			
Emissive intensity	2022	2021	Delta %
Emissive intensity (based on revenue)	232	248	-6%
Emissive intensity (based on number of sites)	8,31	8,38	-0,9%

Keeping under control the emission intensity index in relation to INWIT's turnover, as well as the number of sites, according to the Market based approach, the benefit deriving from 100% of renewable energy supply in 2022 is evident. In fact, the emissive intensity index is reduced by 97% compared to 2021.

Table 17 Emission intensity (Scope 1 + Scope 2 "Market Based").

Emission intensity (Scope 1 + Scope 2 "Market Based")			
Emissive intensity	2022	2021	Delta %
Emissive intensity (based on revenue)	3,6	131	-97%
Emissive intensity (on the number of sites bas)	0,13	4,44	-97%

## CIRCULAR ECONOMY

GRI 306-1, 306-3, 306-4, 306-5

INWIT attaches a central role to the circular economy in relation to its commitments. In fact, the entire network of towers and microcells of INWIT responds 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. The Company shares its infrastructure with several customers, who use it without ownership, and ensures its construction, maintenance, power, air conditioning and safety.

In line with this approach, INWIT carried out a life cycle analysis of its model sites, rooftop and raw land in 2022. The Life Cycle Assessment is one of the best operational tools to support the circular economy, which can promote reflections on the impacts of infrastructure throughout its life cycle and adopt sustainable choices.

With the aim of making its infrastructures more and more circular, INWIT has defined the Guidelines for the validation of non-standard antenna holder structures, to make available to suppliers the address lines for the definition of new design proposals. Works, in fact, must be designed to have limited impacts throughout the life cycle, must last more time as possible, must be repairable and in the end-of-life phase must be able to be broken down so that every part of them finds a new use.



The innovative infrastructures realized with a vision of circular economy such as the wooden tower, the fast-site site and quick 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.

The INWIT approach was also included in the paper position Paper of the Italian Global Compact network on "Sustainable supply chain management: between responsibility and opportunities for enterprises". Among the initiatives with repercussions of circular economy put in place by INWIT, it should also be highlighted the replacement of lead batteries with lithium batteries to power sites in the Localities without the possibility of connection to the network.

Lithium batteries, in fact, have a longer life cycle (average life three times longer), less space and weight and therefore can store more energy. Increased delivery times and with an integrated Battery Management System with the possibility of direct remote control. In 2022 INWIT replaced a total of 159 kits of 200Ah. In addition, INWIT has included circulation criteria in the process of purchase of goods and services, applicable according to the product categories, to strengthen its commitments.

## INWIT WASTE MANAGEMENT PROCEDURES

GRI 306-1, 306-3, 306-4, 306-5

Starting from 2021, INWIT introduced a new material management model that provides for the use of the main warehouse of Maddaloni (CE) to which, for possible flexibility needs, three territorial deposits are added.

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 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).

In view of the nature of the materials disposed of during 2022 – air conditioners, batteries, and electrical equipment (energy stations, rectifiers, electrical switchboards) – a significant material recovery of 98,5% of the 931,4 tons of waste produced was achieved.

**Particularly, during 2022, four waste disposal operations were carried out which involved three lots of materials and a shelter burned at a site:**

- ▶ Air conditioners weighing 364,1 tons;
- ▶ Batteries with a total weight of 247,9 tons;
- ▶ electrical material distributed among energy stations, switchboards, rectifiers, etc., for a total weight of 312,5 tons;
- ▶ Shelter of the total weight 6,9 tons.

During 2022, the waste management system was audited at the request of the supervisory body, during which: no "non-compliance" was detected under the single environmental text and the waste management process was adequately supervised.

**Table 18** Hazardous and non-hazardous waste intended and not intended for disposal, with % recycled waste.

Type of refusal	Unit of measure	TOTAL	Not sent for disposal Recycled	Sent for disposal		Recycling% of the total waste generated
				Incineration (without energy recovery)	Landfill	
<b>Hazardous waste</b>	ton	<b>612,02</b>	<b>598,94</b>	-	-	<b>97,86%</b>
Air-conditioning units	ton	364,13	363,45	-	0,68	<b>99,81%</b>
Batteries	ton	247,89	235,50	-	12,39	<b>95,00%</b>
<b>Non-hazardous waste</b>	ton	<b>319,35</b>	<b>316,98</b>	-	-	<b>99,26%</b>
Electrical material	ton	312,5	311,77	-	0,69	<b>99,77%</b>
Shelter	ton	6,89	5,21	-	1,68	<b>75,62%</b>
<b>TOTAL WASTE PRODUCED</b>	ton	<b>931,37</b>				<b>98,34%</b>





## THE PROTECTION OF BIODIVERSITY

### POSITION PAPER ON THE PROTECTION OF BIODIVERSITY

In 2022, **biodiversity protection** was also one of INWIT's material themes, to the point that, in order to be transparent in communication to all its stakeholders and to witness its active commitment to pursuing the UN's SDG 15 Agenda 2030 "to protect, restore and promote the sustainable use of terrestrial ecosystems, manage forests sustainably, combat desertification and halt and reverse soil degradation and stop biodiversity loss" has prepared and published a **position paper** chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://cdn.inwit.it/website/wp-content/uploads/2022/11/INWIT-Position-Paper-Biodiversita%CC%80.pdf on the assessment of the impacts and opportunities of its infrastructure on biodiversity.

The issue of biodiversity has also been addressed at regulatory level in Europe and Italy. The European Taxonomy (Reg. EU 852/2020) defined the environmental objective "protection and restoration of biodiversity and ecosystems", while the Italian legislator approved on 8 February 2022 the amendments to Article 9 (E 41) of the Constitution which introduce the protection of the environment, biodiversity, ecosystems, and animals as one of the fundamental principles of the Constitutional Charter.

Starting from a careful and in-depth examination of the state of the art of animal and plant species in Italy, reported in the paper, INWIT identified about 5% of its towers within Natura Sites 2000 and more generally analyzed the distribution of its sites among the different environmental types of areas, as reported below.

**Table 19** State of the art of INWIT sites with respect to the environmental typology.

Environmental typology	INWIT sites %
Built areas	55,3%
Agricole areas	33,1%
Wooded areas and semi-natural environments	11,1%
Wetlands	0,02%
Water bodies	0,5%

Because of the precautionary principle and with a conservative approach, INWIT evaluated the effects of its activities, dividing them by type and treating them in detail.

As a result of this evaluation, **the theoretical values relating to the estimation of the magnitude of the incidences relevant to the activities under examination are invariably comprised between the absent/non-significant and mild/moderate values, not presenting the presence of possible significant impacts.**

The incidences with higher magnitude values, however included in the above values, relate to the alteration or disturbance of species habitats. Moreover, opportunities to benefit and protect biodiversity that may be directly linked to INWIT activities in a tower as a service logic were evaluated. For example, they include installing IoT sensors and smart cameras, environmental monitoring, wildlife monitoring, or fire prevention on towers.

## INWIT AND WWF TOGETHER TO PREVENT FIRES IN FORESTED OASES

Aware that Italy is considered a hotspot of precious biodiversity and to be protected from the increasing risks posed by climate change, such as fires, the main threat of Italian forests, in 2022, INWIT started a collaboration with WWF to contribute to the protection of biodiversity, combining the different competencies for a common goal.

Forests play a key role in the biosphere: They regulate climate and carbon exchanges, ensure primary production and control of soil erosion.

The state of forests in Italy is a matter of concern. There are still quite limited areas today and, above all, many animal and plant species have now disappeared. Our forests, while recovering, still show difficulty in hosting high levels of biodiversity that ensure important ecological functions.

In a logic of tower as a service, INWIT can host on its tower's technology aimed at automatically detecting and early warning the spread of forest fires in specific areas, protecting the biodiversity present in the areas where the infrastructure insists.

Three WWF Oases were selected to start monitoring: Macchiagrande (RM), Bosco di Vanzago (MI) and Calanchi di Atri (TE).





An illustration featuring a blue truck with a green cargo box driving on a yellow road. A large, dark blue 'X' is superimposed over the scene. A small blue envelope icon is positioned near the truck. The background consists of a light blue sky with a yellow sun and a white cloud, and a light blue ground area.

# ANNEXES

## DETAILED TABLES ON HUMAN CAPITAL INDICATORS

**Table 20** 14 Diversity in government bodies and among employees (GRI 405-1).

Total number of employees per frame and gender												
To 31.12.2021												
	North			Center and Sardinia			South and Sicily			Total		
	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Managers	4	1	5	11	3	14	1	0	1	16	4	20
Executives	8	2	10	21	13	34	3	0	3	32	15	47
Employees	36	23	59	42	39	81	28	11	39	106	73	179
<b>Total</b>	<b>48</b>	<b>26</b>	<b>74</b>	<b>74</b>	<b>55</b>	<b>129</b>	<b>32</b>	<b>11</b>	<b>43</b>	<b>154</b>	<b>92</b>	<b>246</b>

Total number of employees per frame and gender												
To 31.12.2022												
	North			Center and Sardinia			South and Sicily			Total		
	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Managers	4	1	5	11	2	13	1	0	1	16	3	19
Executives	11	3	14	26	11	37	3	0	3	40	14	54
Employees	36	26	62	38	44	82	28	11	39	102	81	183
<b>Total</b>	<b>51</b>	<b>30</b>	<b>81</b>	<b>72</b>	<b>57</b>	<b>132</b>	<b>32</b>	<b>11</b>	<b>43</b>	<b>158</b>	<b>98</b>	<b>256</b>

Percentage of employees by job category and gender						
Number of people	To 31 December 2021			To 31 December 2022		
	Men (% on category)	Women (% on category)	% of total organic	Men (% on category)	Women (% on category)	% of total organic
Managers	80%	20%	8%	84%	16%	7%
Executives	68%	32%	19%	74%	26%	21%
Employees	59%	41%	73%	56%	44%	71%
<b>Total</b>	<b>63%</b>	<b>37%</b>	<b>100%</b>	<b>62%</b>	<b>38%</b>	<b>100%</b>

Percentage of employees by profile and age group								
Number of people	To 31 December 2021				To 31 December 2022			
	30> years	30-50 years	50< years	Total	30> years	30-50 years	50< years	Total
Managers	0%	20%	80%	100%	0%	26%	74%	100%
Executives	0%	34%	66%	100%	8%	46%	45%	100%
Employees	5%	51%	44%	100%	1%	48%	51%	100%
<b>Total</b>	<b>4%</b>	<b>45%</b>	<b>51%</b>	<b>100%</b>	<b>4%</b>	<b>46%</b>	<b>51%</b>	<b>100%</b>

Composition of the Board of Directors by age group								
Number of people	to 31 december 2021				to 31 december 2022			
	30> years	30-50 years	50< years	Total	30> years	30-50 years	50< years	Total
Men	years	30-50	5	7	-	years	3	6
Women	years	50<	4	6	-	1	4	5
<b>Total</b>	<b>years</b>	<b>Total</b>	<b>30&gt;</b>	<b>13</b>	<b>-</b>	<b>4</b>	<b>7</b>	<b>11</b>

**Table 21** Basic salary and overall salary ratio of women to men (GRI 405-2)<sup>18</sup>.

Relationship between female and male basic salary			
Basic salary	2021	2022	Delta
	Women-to-Men ratio	Women-to-Men ratio	
Managers (excluding CEO/GM)	-26%	-31%	21%
Managers (Excluding CEO/GM and Directors)	-39%	-17%	-56%
Executives	-4%	3%	-180%
Employees	-7%	-8%	20%
<b>Total (Excluding CEO/GM and Directors)</b>	<b>-10%</b>	<b>-16%</b>	<b>54%</b>
<b>Total (Excluding CEO/GM)</b>	<b>-20,6%</b>	<b>-22,5%</b>	<b>-8,6%</b>

The relationship between women's and men's overall pay			
Total remuneration	2021	2022	Delta
	Women-to-Men ratio	Women-to-Men ratio	
Managers (excluding CEO/GM)	-31%	-42%	36%
Managers (Excluding CEO/GM and Directors)	-46%	-26%	-43%
Executives	-1,3%	1,5%	-214%
Employees	-9%	-8%	-16%
<b>Total (Excluding CEO/GM and Directors)</b>	<b>-14%</b>	<b>-19%</b>	<b>37%</b>
<b>Total (Excluding CEO/GM)</b>	<b>-26%</b>	<b>-28%</b>	<b>9%</b>

<sup>18</sup> The "basic salary" includes the recurring fixed salary of employees, while the "total salary" includes the following variable items: MBO a target; PIV sales incentives a target; Canvass a target; UT disbursed; LTI plan cycle at fair value.



Tabella 22 New hires and turnover (GRI 401-1).

Revenue										
n. people	2021					2022				
	<30	30-50	>50	Total	Recruitment % rate	<30	30-50	>50	Total	Recruitment % rate
Men	2	22	3	27	18%	2	12	5	19	12%
Women	2	20	2	24	26%	4	11	1	16	16%
<b>Total</b>	<b>4</b>	<b>42</b>	<b>5</b>	<b>51</b>	<b>21%</b>	<b>6</b>	<b>23</b>	<b>6</b>	<b>35</b>	<b>14%</b>
<b>% Turnover</b>	<b>44%</b>	<b>38%</b>	<b>4%</b>	<b>21%</b>		<b>67%</b>	<b>20%</b>	<b>5%</b>	<b>14%</b>	

Outputs										
n. persone	2021					2022				
	<30	30-50	>50	Total	Turnover %	<30	30-50	>50	Total	Turnover %
Men	1	2	4	7	5%	1	11	3	15	9%
Women	1	3	0	4	4%	2	4	4	10	10%
<b>Total</b>	<b>2</b>	<b>5</b>	<b>4</b>	<b>11</b>	<b>4%</b>	<b>3</b>	<b>13</b>	<b>7</b>	<b>25</b>	<b>10%</b>
<b>% Turnover</b>	<b>22%</b>	<b>5%</b>	<b>3%</b>	<b>4%</b>		<b>33%</b>	<b>13%</b>	<b>5%</b>	<b>10%</b>	

Table 23 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 placement				
Number of people	2021		2022	
	Total employees receiving performance ratings	Total %	Total employees receiving performance ratings	Total %
Managers	20	100%	19	100%
Executives	47	100%	54	100%
Employees	179	100%	183	100%
<b>Totale</b>	<b>246</b>	<b>100%</b>	<b>256</b>	<b>100%</b>

Number of people	2020		2021	
	Total employees receiving performance ratings	Total %	Total employees receiving performance ratings	Total %
Men	154	100%	158	100%
Women	92	100%	98	100%
<b>Total</b>	<b>246</b>	<b>100%</b>	<b>256</b>	<b>100%</b>

## TABLE LINKING THE THEMES OF LEGISLATIVE DECREE 254/2016, GLOBAL COMPACT PRINCIPLES, MATERIAL THEMES AND SUSTAINABILITY PLAN

LGS. D. 254/2016	Global compact principles	Material topics	Sustainability plan 2022-2024	
			SDGs	Medium to long term objective
<b>Fight against active and passive corruption</b>	<b>Fight against corruption</b> Companies are committed to combating corruption in all its forms, including extortion and bribes	<b>Sustainability governance, business resilience &amp; efficiency</b> <b>Business ethics and integrity</b>	8 DECENT WORK AND ECONOMIC GROWTH 16 PEACE, JUSTICE AND STRONG INSTITUTIONS	Develop and maintain a governance system in line with national and international best practices
<b>Staff-related aspects</b>	<b>Work</b> Businesses are required to support freedom of association for workers and to recognize the right to collective bargaining The elimination of all forms of forced and compulsory labor The effective elimination of child labor The elimination of all forms of discrimination in employment and occupation	<b>Diversity and inclusiveness in the workplace</b> <b>Employee development and enhancement</b> <b>Health and safety at work</b>	4 QUALITY EDUCATION 5 GENDER EQUALITY 8 DECENT WORK AND ECONOMIC GROWTH 3 GOOD HEALTH AND WELL-BEING	Encourage the involvement, well-being and development of our people Ensure high safety standards along the value chain
<b>Social aspects and human rights</b>	<b>Human rights</b> Make sure that they are not, albeit indirectly, accomplices in human rights abuses Businesses are required to promote and respect human rights universally recognized within their spheres of influence	<b>Supply chain sustainability</b> <b>Quality and inclusiveness of the service</b> <b>Cyber security and Privacy</b> <b>Innovation and digitization</b> <b>Impacts on the territory and the community</b>	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE 11 SUSTAINABLE CITIES AND COMMUNITIES 17 PARTNERSHIPS FOR THE GOALS	To be an actor in support of operators in the digitization of the country Contribute to the social, cultural and economic development of the community
<b>Environmental aspects</b>	<b>Environment</b> Companies are required to support a preventive approach to environmental challenges To take initiatives that promote greater environmental responsibility To encourage the development and dissemination of environmentally friendly technologies	<b>Circular economy</b> <b>Efficiency and reduction of energy consumption</b> <b>Combating climate change</b> <b>Protection of biodiversity</b>	8 DECENT WORK AND ECONOMIC GROWTH 12 RESPONSIBLE CONSUMPTION AND PRODUCTION 15 LIFE ON LAND 13 CLIMATE ACTION	Reduce the environmental footprint with a circular economy approach Define a climate strategy with the objective of achieving carbon neutrality as of 2025

## GRI CONTENT INDEX

<b>Statement of use</b>	INWIT has reported in accordance with the GRI Standards for the period from 1 January 2022 to 31 December.
<b>GRI 1 used</b>	GRI 1: Foundation 2021

GRI Standard	Disclosure	Page's number/note	Omission		
			REQUIREMENT OMITTED	REASON	EXPLANATION
GRI 2: General disclosure (2021)					
The organization and its reporting practices					
2-1	Organizational details	12-14			
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### Stakeholder engagement

2-29	Approach to stakeholder engagement	26-27
2-30	Collective bargaining agreements	INWIT provides useful notice in case of company reorganization, according with national collective labor agreement for companies providing telecommunications services, trade union and law. 96

### Material Topics

#### GRI 3: Material Topics 2021 (2021)

3-1	Process to determine material topics	24-25
3-2	List of material topics	24-25

#### MATERIAL TOPIC: Sustainable governance, business resilience & efficiency

##### GRI 201 Economic Performance (2016)

3-3	Management of material topics	14; 16-19; 23-37; 41; 44-45
201-1	Direct economic value generated and distributed	44

##### GRI 207 Tax (2019)

3-3	Management of material topics	46-47
207-1	Approach to tax	46
207-2	Tax governance, control, and risk management	46-47
207-3	Stakeholder engagement and management of concerns related to tax	46-47

#### MATERIAL TOPICS: Ethics and business integrity

##### GRI 205 Anti-corruption (2016)

3-3	Management of material topics	38
205-1	Operations assessed for risks related to corruption	38
205-2	Communication and training about anti-corruption policies and procedures	In 2022, anti-corruption training was provided only to new hires. Therefore, the members of the board and other employees have not received training on the subject. 38; 94
205-3	Confirmed incidents of corruption and actions taken	In 2022 no incidents of corruption were recorded. 38

#### MATERIAL TOPICS: Energy consumption efficiency and reduction

##### GRI 302 Energy (2016)

3-3	Management of material topics	103-105
302-1	Energy consumption	105



MATERIAL TOPIC: Fight against Climate change			
GRI 305 Emissions (2016)			
3-3	Management of material topics	106-109	
305-1	Direct (scope 1) GHG emissions	107-109	
305-2	Energy indirect (scope 2) GHG emissions	107-109	
305-3	Other indirect (scope 3) GHG emissions	107-109	
305-4	Intensity of GHG emissions	109	
MATERIAL TOPIC: Circular economy			
GRI 306 Waste (2020)			
3-3	Management of material topics	109-110	
306-1	Waste generated and significant waste-related impacts	109-111	
306-3	Waste generated	109-111	
306-4	Waste diverted from disposal	109-111	
306-5	Waste direct to disposal	109-111	
MATERIAL TOPIC: Biodiversity protection			
GRI 304 Biodiversity (2016)			
3-3	Management of material topics	112-113	
304-1	Owned, leased or managed operational sites in protected areas and areas of high biodiversity value outside or close to protected areas	112-113	
304-2	Significant impacts of activities, products and services on biodiversity	112-113	
MATERIAL TOPIC: Employees' development and enhancement			
GRI 401 Employment (2016)			
3-3	Management of material topics	89; 91	
401-1	New employee hires and employee turnover by age group, gender, and region	89; 118	
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	91	
GRI 404 Training and education (2016)			
3-3	Management of material topics	93-94	
404-1	Average hours training per year per employee	93	
404-3	Percentage of employees receiving regular performance and career development reviews, by gender and by employee category	94; 118	
GRI 405 Diversity and equal opportunities (2016)			
3-3	Management of material topics	86-88	
405-1	Diversity of governance bodies and employees	29; 88; 116-117	
405-2	Ratio of basic salary and remuneration of women to men	117	
GRI 406 Non-discrimination (2016)			
3-3	Management of material topics	90	
406-1	Incidents of discrimination and corrective actions taken	90	

MATERIAL TOPIC: Occupational health and safety			
GRI 403 Occupational health and safety (2018)			
3-3	Management of material topics	97	
403-1	Occupational health and safety management system	97-98	
403-2	Hazard identification, risk assessment, and incident investigation	97-98	
403-3	Occupational health services	97-98	
403-4	Worker participation, consultation, and communication on occupational health and safety	97	
403-5	Worker training on occupational health and safety	97	
403-6	Promotion of worker health	97	
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	97	
403-8	Workers covered by an occupational health and safety management system	97	
403-9	Work-related injuries	98-99	
MATERIAL TOPIC: Impacts on territory and community			
GRI 413 Local communities (2016)			
3-3	Management of material topics	74-78	
413-1	Operations with local community engagement, impact assessments, and development programs	74-77	Only qualitative disclosure reported.
MATERIAL TOPIC: Supply chain sustainability			
GRI 308 Suppliers environmental assessment (2016)			
3-3	Management of material topics	78-79	
308-1	New suppliers that were screened using environmental criteria	78-79	
GRI 414 Suppliers social assessment (2016)			
3-3	Management of material topics	78-79	
414-1	New suppliers that were screened using social criteria	78-79	
MATERIAL TOPIC: Cyber security and Privacy			
GRI 418 Customers privacy (2016)			
3-3	Management of material topics	4	
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	In 2022 no complaints regarding breaches of customer privacy and losses of customer data were reported. 40	
OTHER MATERIAL TOPICS			
MATERIAL TOPIC: Innovation and digitalization			
3-3	Management of material topics	62-69	
MATERIAL TOPIC: Service's quality and inclusion			
3-3	Management of material topics	52-56	

## TABLE LINKING THE GLOBAL COMPACT PRINCIPLES

Global Compact		
Category	Global Compact principle	GRI/KPI
Human rights	1. Make sure that they are not, albeit indirectly, accomplices in human rights abuses	414-1
	2. Businesses are required to promote and respect human rights universally recognized within their spheres of influence	403-1, 403-2, 403-3, 403-4, 403-5, 403-6, 403-7, 405-1, 405-2, 406-1, 413-1, 418-1
Work	3. Businesses are required to support freedom of association for workers and to recognize the right to collective bargaining	2-30
Work	4. The elimination of all forms of forced and compulsory labor	As stated in <b>the Code of Ethics</b> , INWIT undertakes not to take advantage, even indirectly, of forced labor and child labor, by guaranteeing its employees and collaborators regular employment contracts and monitoring what is required by contract contracts, activated in accordance with the applicable law. INWIT operates exclusively in the national territory and all its employees are covered by collective bargaining agreements. 98,8% have an indefinite contract.
	5. The effective elimination of child labor	As stated in <b>the Code of Ethics</b> , INWIT undertakes not to take advantage, even indirectly, of forced labor and child labor, by guaranteeing its employees and collaborators regular employment contracts and monitoring what is required by contract contracts, activated in accordance with the applicable law. INWIT operates exclusively in the national territory, where child labor is prohibited by law. Employees over the age of 50 are 51%, those in the age group between 30 and 50 are 45%, and those under the age of 30 are the remaining 4%.
	6. The elimination of all forms of discrimination in employment and occupation	406-1, 405-2, 405-1, 404-3, 404-1, 401-2, 2-7
	7. Companies are committed to combating corruption in all its forms, including extortion and bribes	205-3, 205-2, 205-1
Fight against corruption	8. Companies are required to support a preventive approach to environmental challenges	305-4, 305-3, 305-2, 305-1, 302-1
Environment	9. To take initiatives that 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. To encourage the development and dissemination of environmentally friendly technologies	INWIT, in line with the Sustainability Plan, is committed to achieving goals in terms of innovation and sustainability, for more details please refer to the chapters Intellectual capital and Infrastructure capital.

## REPORT OF 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 2022, 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 2 March 2023 (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 2021 (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.

### Auditors' independence and quality control

We are independent in accordance with the principles of ethics and independence disclosed in the

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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 2022 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.

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, 16 March 2023

*Signed by*

Fabio Chierico  
(Partner)

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



# INTEGRATED REPORT 2022

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