Sustainability Policy

This Policy was approved by the Chief Executive Officer of Open Fiber S.p.A. on 04/02/2022.

Summary

1. Our mission

Open Fiber brings Ultra Broadband optical fiber (Banda Ultra Larga – BUL) to the entire Italian territory to give Italy a new speed and open up access to the most advanced digital services and opportunities offered by an increasingly interconnected world.

It is a strategic choice that responds to the goals set by the Digital Agenda For Europe and the Italian Ultra-Broadband Strategy (Strategia Italiana per la Banda Ultra Larga). It is an ambitious plan that aims to quickly make up for Italy's infrastructural deficit, guaranteeing competitive costs and short implementation times.

As an infrastructure player, Open Fiber is responsible for the construction, management and maintenance of an ultra-fast electronic communications network with high levels of efficiency and reliability.

Open Fiber is only active in the wholesale market - according to a "wholesale only" model - offering access to all interested market players.

2. We create shared value with the social and environmental context in which we operate

At Open Fiber, we believe in the importance of sustainability and the balance between its three pillars (economic, social and environmental). Thanks to our fiber network, we generate economic value for the company, while at the same time producing progress and social value through the integration of environmental topics and social needs into the company's core business and strategy.

We create lasting shared value with all those with whom we interact every day, reconciling business plan objectives with our environmental and social commitments, providing access to a fiber network, actively contributing to the growth of the social and economic fabric of Italian cities and supporting citizens, businesses and public administrations in the indispensable process of technological growth.

Reconceiving products and markets

At Open Fiber, we have reconceived the Italian telecommunications market as a wholesale-only operator, created to deploy in all regions an ultra-broadband network infrastructure entirely based on FTTH optical fiber: a network that by its very nature is high-performance and eco-friendly.

Redefining productivity in the value chain

Productivity and social and environmental topics are closely linked because a sustainable business generates positive externalities and reduces operating costs. At Open Fiber we build the network by exploiting existing infrastructure, we reduce environmental impact through innovative excavation techniques and through energy-efficient engineering solutions and the use of environmentally sustainable materials. In addition, we put our most important resource - our employees - at the center of our operations, for whom we develop welfare and engagement initiatives that help increase a sense of belonging and create a more present and productive workforce towards shared goals.

Enabling local cluster development

The development of a "local cluster" is influenced by the infrastructure that surrounds it: at Open Fiber we are creating a new digital highway, from small villages to large metropolitan areas, guaranteeing everyone full access to an increasingly interconnected world. In addition, the continuous collaboration with schools and universities enables the development of specific skills, 'activating' local talent. The company's growth has a multiplier effect, a virtuous circle between the success of Open Fiber and the development of the local communities where we operate.

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3. Our commitments

The sustainability policy translates the mission into 7 commitments that reflect corporate values, the ethical and social principles enshrined in the Code of Ethics, the fundamental principles of the Global Compact and the Sustainable Development Goals (SDGs) of the United Nations 2030 Agenda. To develop these commitments, we have implemented and maintain a management system that integrates and adopts the principles of the management standards UNI EN ISO 9001, UNI EN ISO 14001, UNI ISO 45001, UNI EN ISO 50001 and is inspired by the ISO 26000 Guidelines. Stakeholder involvement and creation of a corporate culture on sustainability issues are central elements of our approach.

1. We are committed to connecting the country so as to overcome the digital divide

At Open Fiber, we aim to build a future in which the new optical fiber technology can change the lives of Italians and represent an engine of change and economic, social and cultural development for the Country, and will seek to unite Italy once again in the name of overcoming the digital divide.

We connect the country by working to wire many urban and suburban areas, without compromising territory and resources, to allow everyone access to services via a fiber that goes directly into homes without copper cables (FTTH – Fiber To The Home) to develop the network of the future, both with our own investments and with public funds.

2. We enhance our human capital and support fair and inclusive working practices

We recognize and believe in the value of our employees and engage to create a unique environment where everyone can express their skills and talent, maintaining a sense of belonging, pride and motivation and ensuring professional growth paths according to a tailor- made approach.

We establish a real, constructive and transparent dialogue with workers and their representatives, in order to understand their needs, find the best solutions, guarantee fair working conditions and create the conditions for people to follow a career path in line with their abilities and expectations.
We guarantee, right from the selection phase, equal professional opportunities and full inclusion to all people, regardless of age, sexual orientation and identity, disability, state of health,

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ethnic origin, nationality, political opinion, social category and religion so that we can create an environment that values differences.

We also select our suppliers and business partners on the basis of their behaviors. An approach to sustainability and fair, inclusive and non-discriminatory working practices are key criteria in our evaluation processes.

3. We protect the environment and the area where we operat

We invest in technologies that respect the environment and the territory with the aim of building and deploying an infrastructure that is, by its very nature, high-performance and eco-sustainable. We favor the deployment of a optical fiber network on existing structures and, where this is not possible, we choose less invasive laying techniques, protecting the integrity of places, with particular attention to areas of landscape and cultural interest.

We assess the environmental risks and impacts of our activities from a precautionary and "life-cycle" perspective, working with partners and suppliers to improve the protection of the environment and implementing all appropriate measures to prevent or minimize the environmental impact on the territory and the community.

We want to activate a process of dynamic change, aimed at an increasingly conscious use of natural resources, meeting the needs of our customers and providing a network that contributes to reducing environmental impact and combating climate change.

4. 4.   We promote occupational health and safety

We work to ensure high standards for the protection of occupational health and safety, with an incremental approach to current legislation, as set out in the company's Integrated Management System.

We are committed to disseminating and consolidating the culture of occupational health and safety, developing awareness of risks and knowledge and compliance with current legislation on prevention and protection, promoting responsible behavior by all those who collaborate in any way in pursuing the company's objectives.

5. We provide a secure and reliable infrastructure while respecting free competition

We ensure our partners and customers a secure and reliable infrastructure over time, safeguarding fair competition and refraining from collusive, predatory and abusive behavior. As an FTTH

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infrastructure provider, active in the wholesale market only, we offer access to the all-fiber network on fair and non-discriminatory conditions to all interested parties.

6. We believe in the values of ethics and integrity

Ethics and integrity are fundamental elements of our daily actions: we operate in compliance with current legislation and international Conventions on the subject, preventing and opposing any unethical behavior. We are committed to preventing corruption in all its forms, developing incisive, concrete and transparent practices in line with our Code of Ethics and our Organization and Management Model (MOG – Modello di Organizzazione e Gestione) pursuant to Legislative Decree 231/01.

Our values also extend to the supply chain through a Qualification Process that is transparent and open to all interested companies and professionals.

7. We respect human rights

We promote and respect universally recognized human rights by implementing concrete initiatives, adopting socially responsible conduct, condemning any violations and supporting best practices throughout the production chain, knowing that safeguarding human rights improves our performance.

We support the deletion of all forms of irregular, undeclared, discriminatory, forced, compulsory and child labor.

This policy is communicated to stakeholders with a view to transparency and collaboration and is available to the public and anyone who requests it.

The behavior of all those who operate in the interest or on behalf of Open Fiber must be in line with company policies and must concretely translate into collaboration, social responsibility and respect for current regulations, following the principles set out in this policy and the standards of behavior identified in the company's Code of Ethics.

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