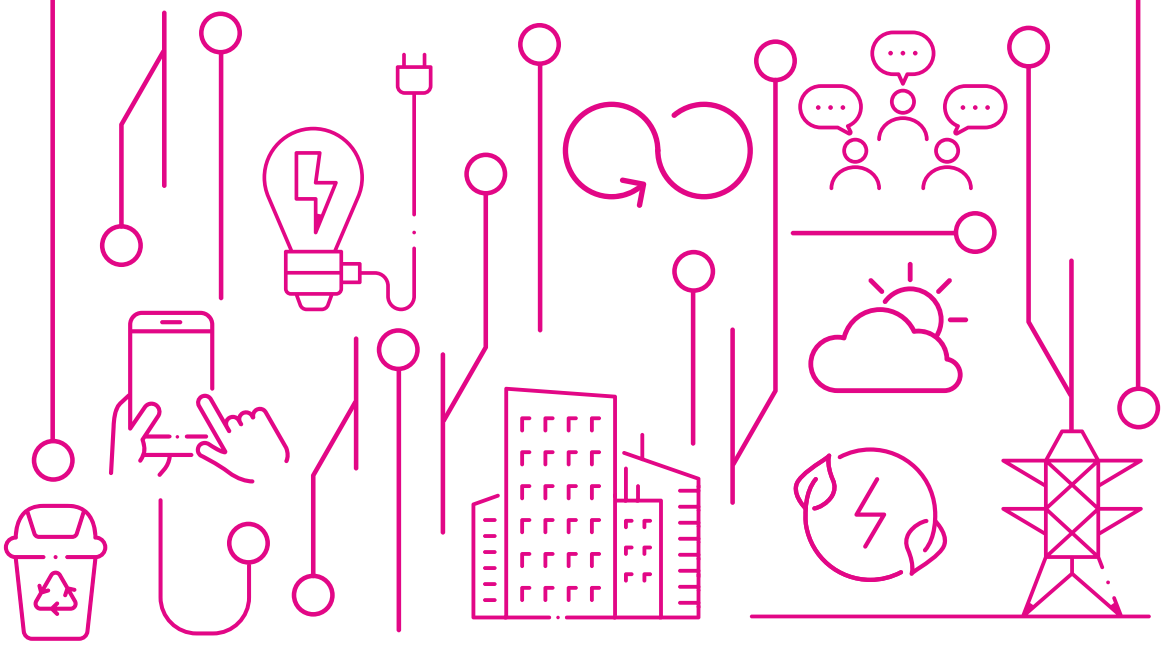
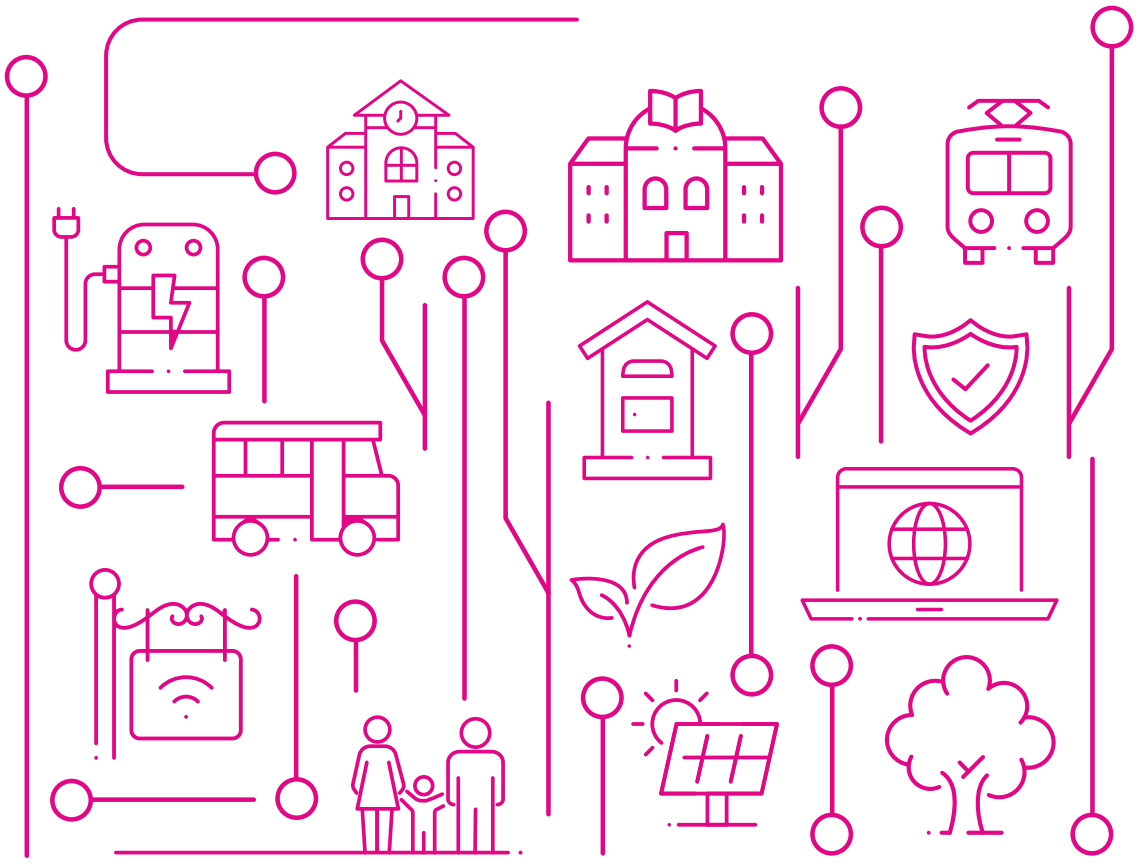
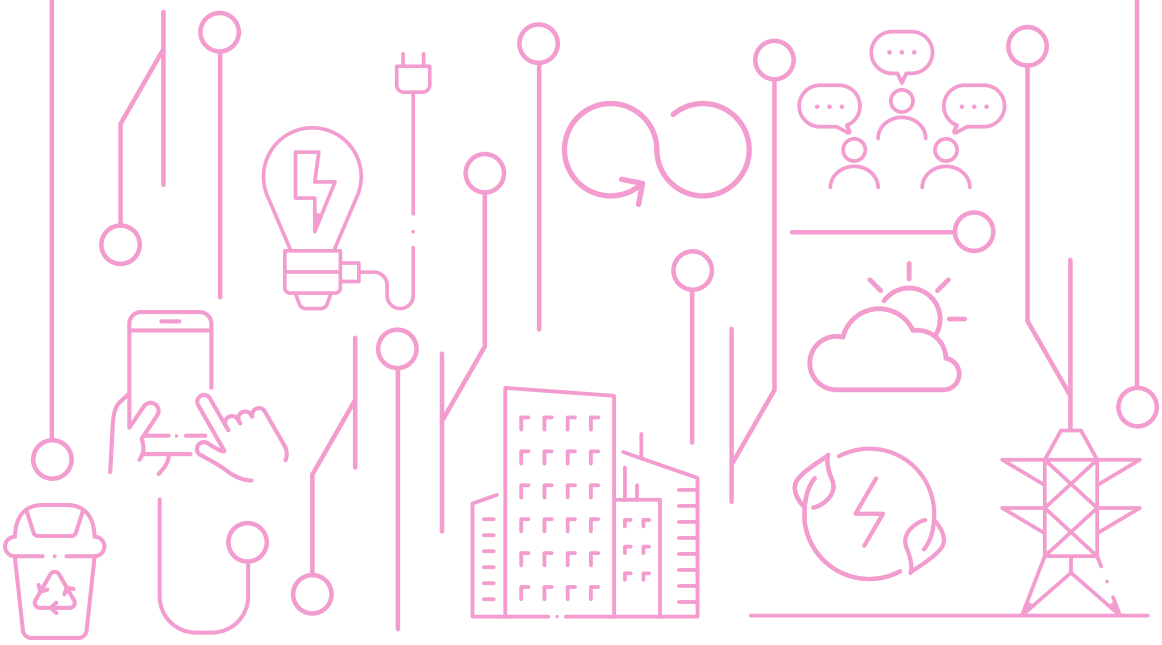


SUSTAINABILITY REPORT 20**24**

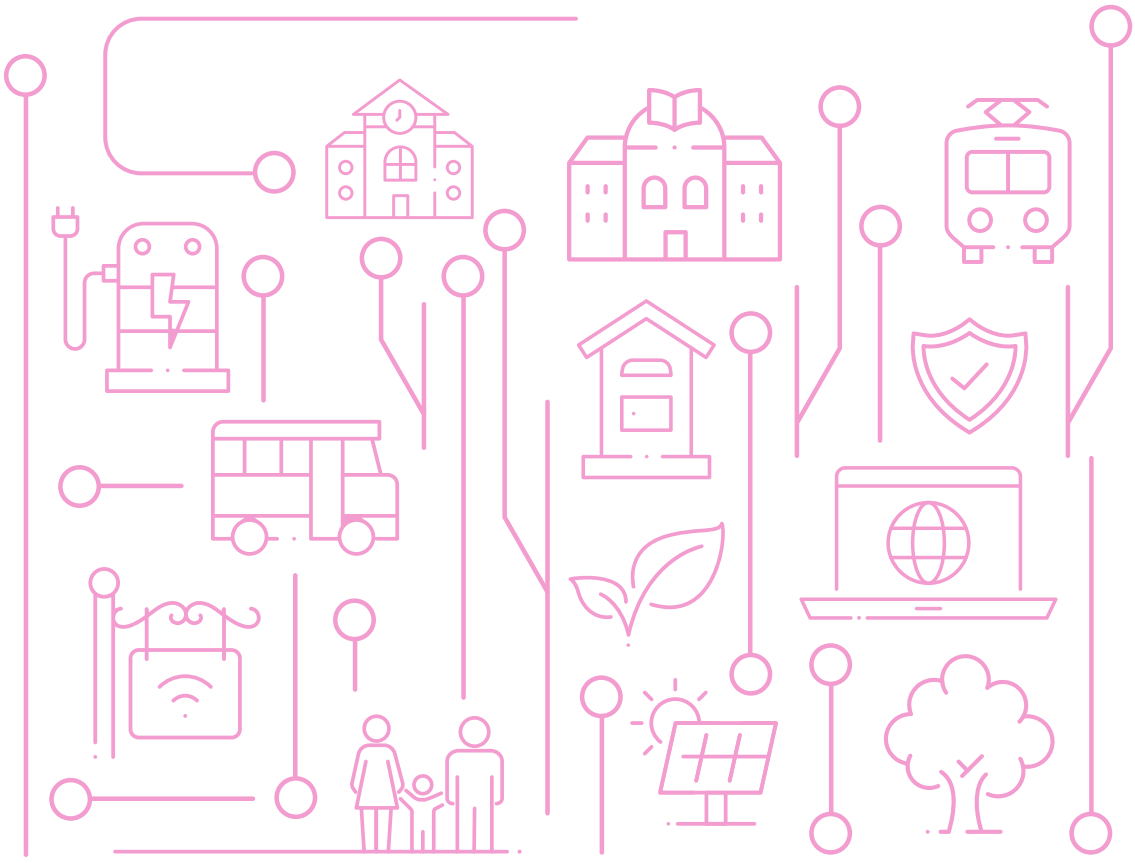


EXECUTIVE SUMMARY

open fiber



SUSTAINABILITY REPORT 2024



EXECUTIVE SUMMARY

open fiber

LETTER TO THE **STAKEHOLDERS**

As regards the closely related issues of ecological and digital transition, the global scenario is evolving. Open Fiber, a company that since its establishment has decided to focus on FTTH optical fiber, creating a network that is intrinsically sustainable due to its reduced impact and the positive effects on the communities and areas where it operates, in 2024 continued to develop its plan aimed at the digital and therefore social development of the country, creating value to be shared with all its stakeholders. Open Fiber's TLC infrastructure is sustainable in all respects, the environmental, the economic and the social one, ensuring energy savings and lower CO_2 emissions, thus contributing to bridging the digital divide in Italy and to generating a level playing field between city dwellers and the people living in the more isolated internal areas.

At the end of 2024, Open Fiber had connected 18.7 million households in large and medium-sized cities, where it operates with a private investment, and in rural areas and industrial districts, where it operates as a public concessionaire respectively with the plans "Ultra Broadband" (*Banda Ultra Larga*, BUL) and "*Italia a 1 Giga*". The BUL plan, in particular, is approaching its conclusion, with a completion rate of over 90%, while in the areas of the plan Italia a 1 Giga, covered by PNRR (National Recovery and Resilience Plan, *Piano Nazionale di Ripresa e Resilienza*) funds, activities are continuing with the aim of completing the infrastructure by mid-2026.

During the year, Open Fiber approved its first Sustainability Plan, a document implementing the sustainability strategy by integrating ESG commitments into the company's business and responding to current and future environmental challenges and social needs. For the first time, all of Open Fiber's actions in the field of sustainability have been brought together in a comprehensive Plan that outlines objectives and timelines for their achievement: from the fight against climate change, to the protection and development of human capital, from the issues of Diversity, Equity & Inclusion, to Governance systems and responsible communication.

In 2024, Open Fiber reached important milestones such as its participation in the UN Global Compact, an initiative aimed at promoting a more inclusive and sustainable global economy, and in the Open-es platform, as Value Chain Leader Partner, a digital alliance supporting the sustainable development of all companies, from SMEs to large players.
Its commitment to decarbonisation is unwavering, as confirmed by the purchase of 100% of electricity from renewable sources also in 2024, as well as by the implementation of the Beyond Value Chain Mitigation strategy defined within the company's Net Zero Plan for the offsetting of residual Scope 1 and 2 emissions through the purchase of carbon credits aimed at financing climate action.
An essential factor in achieving these results is the company's culture in relation to ESG topics, which was further strengthened during the year through the provision of dedicated training courses, such as those on stakeholder engagement and sustainable procurement.
This was also a busy year in terms of technological development: in partnership with Nokia, Open Fiber was the first wholesale only operator in Europe and the first TLC operator in Italy to test the record speed of a fiber optic connection, reaching up to 100 Gbps. The collaboration signed with Namex will allow the enhancement of network infrastructures throughout the country, with particular attention to the periphery of the network (Edge Networking). The goal is to ensure more effective and faster communication

between the various operators at the edge of the network, with significant benefits in terms of reduced latency and improved quality of service. The results of project MEGLIO, launched by Open Fiber with INRiM and INGV to use optical fiber as a sensor for detecting seismic waves, were published by the Nature group, the publisher of some of the most prestigious journals in the international scientific community, as recognition of their scientific value. Open Fiber is also pursuing its commitment to RESTART, an R&D programme involving academic and industrial partners in experiments on Quantum Key Distribution, edge computing, fiber sensing and smart grids.
The focus on people remains central, as demonstrated by the maintenance of the certifications for Gender Equality according to the UNI/PdR 125:2022 standard and for Health and Safety Management according to the ISO 45001 standard, as well as by the awarding of recognitions such as Top Employer and Great Place to Work.

While the availability of VHCN (Very High Capacity Network) networks in Italy is increasing more and more, the next step on the path towards the completion of the digitalisation process in the country - which has so far attracted a large amount of public and private investment - is the use of these networks, a transition that will have a concrete impact on the sustainability of the country's economic system. For this reason, Open Fiber is working with institutions, local administrations and operators to build pathways that allow for an ever-increasing migration of users from the old copper networks to the new fiber networks, to seize all the opportunities offered by the new digital services for which Open Fiber is an enabling platform.

Paolo Ciocca
Chairman

Giuseppe Gola
Chief Executive Officer and General Manager

2024

HIGHLIGHTS

18.7 Millions
Households Passed
(FTTH and FWA)

Open Fiber
is the Main
FTTH Operator
in Italy

Over
140,000 km
of fiber optics
infrastructure
realised

Over
300 client **operators**

240 large and medium-sized
municipalities
being marketed

Over **6,600**
small municipalities
being marketed

Best in Media Communication
Certification obtained
for the **fifth year** in a row

Maintenance of the
QHSE system certifications
(ISO 9001, ISO 14001, ISO 45001)

Training courses on
sustainability and **sustainable procurement** were provided

WE SUPPORT
UN GLOBAL COMPACT

Participation of Open Fiber in the
UN Global Compact

Participation in
Open-es
as a
Value Chain Leader Partner

Research and innovation through the
RESTART programme
(Pesco, Net4Future,
Sensing Net,
Graphics, Telesmeg)

5G Fréjus inception
study project
first European funded
project involving Open Fiber

EcoVadis
platinum medal
rating obtained

Validation by
Science Based
Targets initiative (SBTi)
of the emission reduction targets

Approval of the
first Sustainability Plan

Obtainment of
GHG inventory
certification (ISO 14064) 2023
and CDP rating

Offsetting of 2023
scope 1 and 2
emissions through
the purchase
of carbon credits

100% electricity
bought
by Open Fiber derives
from renewable sources

Maintenance of energy
management system certification
(ISO 50001)

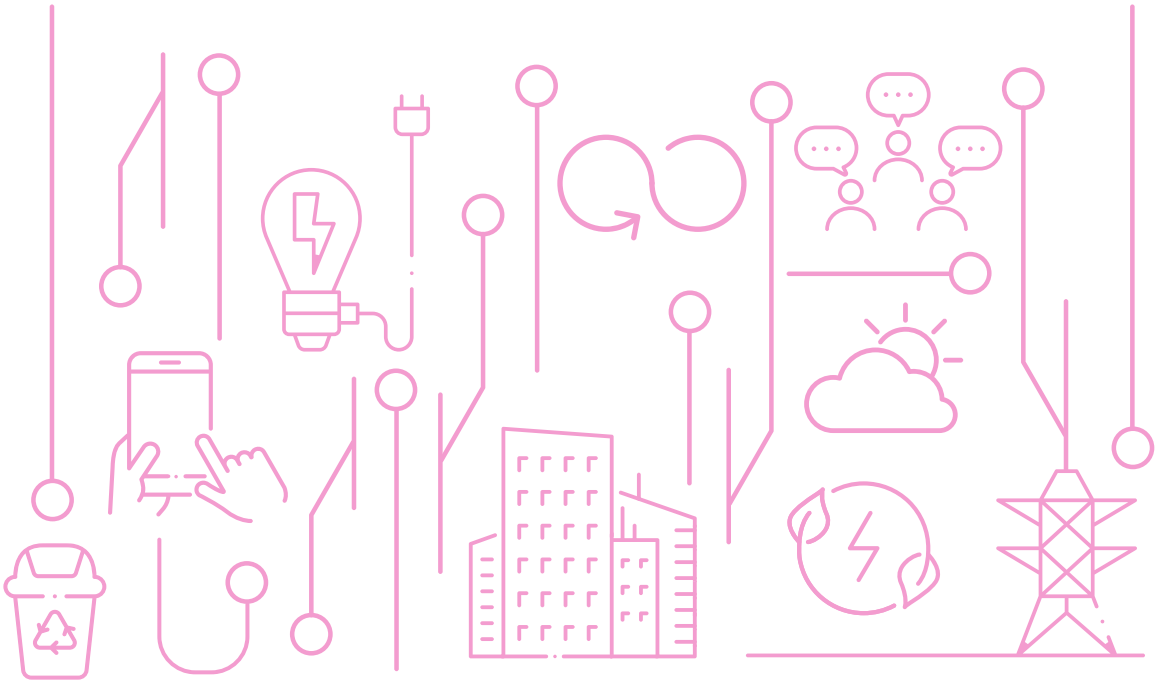
Top Employers and
Great Place To Work
certifications

+26,500 hours
of training within HSE
Open Fiber and
Open Fiber Network Solutions

Maintenance of
Gender Equality
Certification
(UNI/PdR 125:2022)

+4% Open Fiber
employees

Around 34% of Open Fiber
workforce are women



ENABLING SUSTAINABLE **FUTURE**

STRATEGY AND SUSTAINABILITY PLAN

It is possible to integrate digital technologies with practices and strategies that strike a balance between technological progress and environmental, economic and social responsibility. Open Fiber works towards this every day with the aim of ensuring sustainable digital development throughout the country. To this end, it bases its **Sustainability Strategy** on real pillars on which it builds its medium and long-term commitment[1]:

1 The pillars of the sustainability strategy were validated by the Sustainability Committee in January 2023 and approved by the Board of Directors in the 2022 Sustainability Report.

Fighting climate change

devising a long-term decarbonisation strategy starting from the mapping of *value chain* emissions and the definition of a path to reduce direct and indirect emissions.

Protection and development of human capital:

guaranteeing the well-being and safety of people, enhancing the talent of human capital and individual skills, and ensuring the personal and professional development of its resources.

Diversity Equity & Inclusion

strengthening programmes dedicated to valuing the uniqueness and differences that distinguish people, guaranteeing equal opportunities and reinforcing an inclusive culture in line with company values.

Governance Systems

strengthening the monitoring of relevant ESG issues, renewing its commitment to adopt policies and practices that reflect the Company's mission, vision and values with the aim of preserving and increasing value for its stakeholders, maintaining trust in the territory and guaranteeing environmental, social and economic sustainability.

Responsible communication

maintaining an ongoing dialogue with stakeholders, communicating the results achieved and the commitments made in a responsible manner, and conveying the Company's brand identity in an effective, clear and transparent way.

Sustainable value chain

developing a sustainable value chain model, increasing the awareness of the actors involved on ESG issues and involving the entire supply chain in the adoption of the highest standards of quality and environmental and social responsibility.

Value for the community

supporting the country in its digitalisation process and in overcoming the digital divide, strengthening stakeholder engagement programmes and creating value for the communities where we operate in order to respond to the social needs of the territory.

Circularity

defining a resource management strategy to increase infrastructure sustainability, developing business models that respond to the challenges of the circular economy.

Innovation and development

continuous investment in research with the aim of providing constant technological innovation, establishing partnerships with leading companies in the sector, focusing on cutting-edge techniques and technologies and identifying solutions that guarantee a high-performance network infrastructure.

In September 2024, as part of the implementation of its Sustainability Strategy, Open Fiber issued the Company's **first Sustainability Plan**, validated by the Sustainability Committee and approved by the Board of Directors. It shares the same **time horizon as the business plan** and pursues a series of **sustainability objectives**, for each of which **specific actions** have been identified, accompanied by **KPIs**, **qualitative and quantitative targets**, **timing**, **expenditure forecasts** and a clear attribution of **responsibilities** within the organisation, as well as **direct and indirect impacts** produced by the action itself.

The document includes:

- **9 pillars**, of which 4 are distinctive sustainability and 5 are essential sustainability;
- **21 objectives**, of which 8 are distinctive sustainability and 13 are essential sustainability;
- **66 actions**, of which 43 are distinctive sustainability and 23 are essential sustainability.

FIGURE 1: SUSTAINABILITY STRATEGY PILLARS

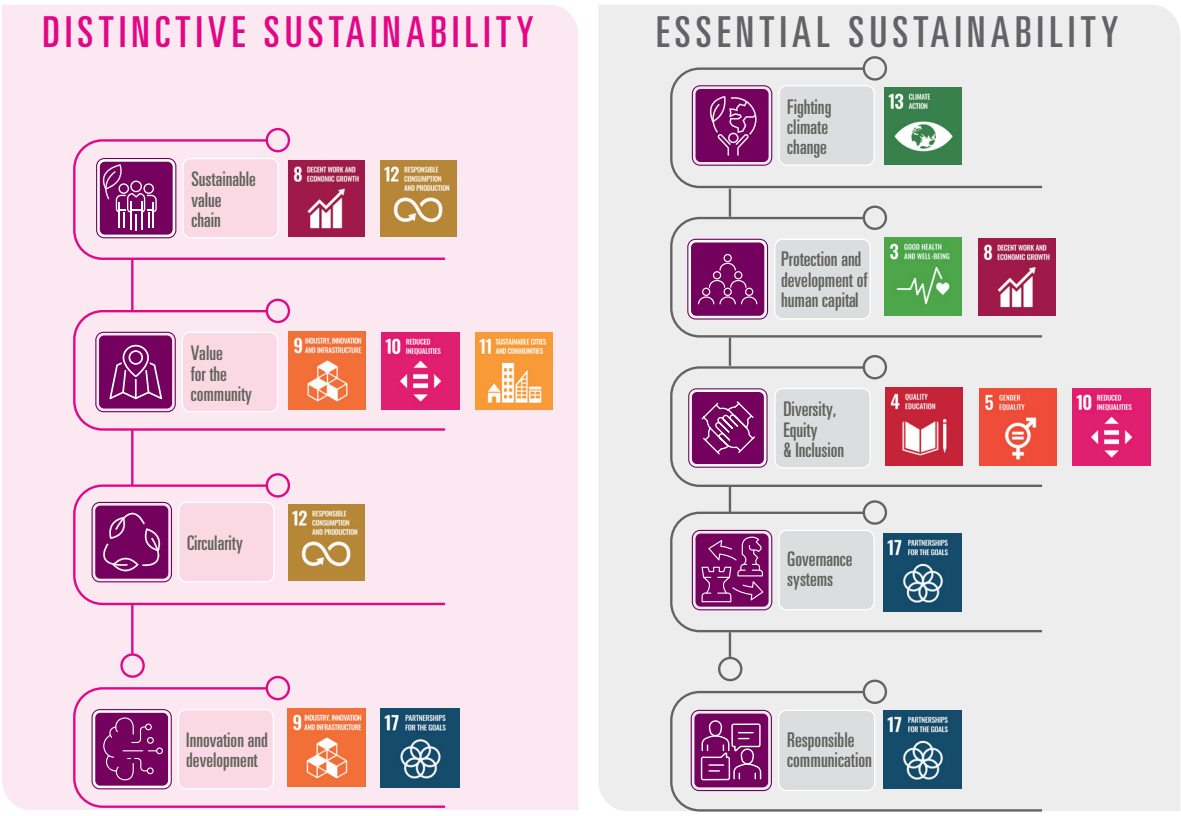


FIGURE 2: SUSTAINABILITY PLAN OVERVIEW

ESSENTIAL SUSTAINABILITY - 43 ACTIONS

PILLAR ES. 1 Fighting climate change

ES. 1.1. Increasing the efficient use of energy
ES. 1.2. Embarking on the decarbonisation strategy

PILLAR ES. 2 Protection and development of human capital

ES. 2.1. Promoting employability
ES. 2.2. Creating a digital & data-driven organisation
ES. 2.3. Developing shared leadership
ES. 2.4. Strengthening safety-minded positioning

PILLAR ES. 3 Diversity, Equity & Inclusion

ES. 3.1. Strengthening DE&I values within the company
ES. 3.2. Promoting DE&I along the supply chain

PILLAR ES. 4 Governance systems

ES. 4.1. Ensuring adequate levels of security against cyber threats and service interruptions
ES. 4.2. Assessing performances through sustainability ratings
ES. 4.3. Strengthening anti-corruption practices and fostering a culture of trust

PILLAR ES. 5 Responsible communication

ES. 5.1. Influencing decision makers and creating discussion tables
ES. 5.2. Increasing brand awareness, including on the end consumer

DISTINCTIVE SUSTAINABILITY - 23 ACTIONS

PILLAR DS.1 Sustainable value vhain

DS. 1.1. Driving supply chain growth on ESG issues
DS. 1.2. Orienting logistics processes towards low-impact models

PILLAR DS.2 Value for the community

DS. 2.1. Supporting Italian SMEs in the digital challenge
DS. 2.2. Supporting the growth of local communities in a win-win perspective
DS. 2.3. Contributing to a data-driven development of the National System

PILLAR DS.3 Circularity

DS. 3.1. Increasing infrastructures' circularity

PILLAR DS.4 Innovation and development

DS. 4.1. Promoting strategic partnerships to foster innovation
DS. 4.2. Joining to R&D programmes

Environment Social Governance

PARTICIPATION IN THE UNITED NATIONS GLOBAL COMPACT - UNGC

In 2024, **Open Fiber** joined the **Global Compact of the United Nations**, a voluntary initiative that invites companies from all over the world to align their strategies and activities with ten universally recognised principles in the areas of human rights, labour, the environment and anti-corruption, and to act in support of the Sustainable Development Goals (SDGs).

ESG CERTIFICATION

At the beginning of 2023, Open Fiber was the first company in Italy to obtain the **ESG certification** (Environmental, Social, Governance), a certificate issued only to organisations that meet criteria that summarise the requirements of the best ESG practices and the most widespread sustainability standards.

ESG RATING- GRESB INFRASTRUCTURE ASSET ASSESSMENT

In 2024, Open Fiber took part, for the second year in a row, in the international assessment developed by the independent organisation GRESB (Global Real Estate Sustainability Benchmark), ranking **above the average score of its *peer group*** and also of all participants.

ESG RATING - 2024 ECOVADIS

In 2024, for the first time, Open Fiber joined **EcoVadis** - the ESG vendor rating platform that assesses performances in four areas: environment, ethics, labour practices and human rights, sustainable procurement - obtaining the **platinum medal** and ranking among the **top 1% of companies** in the areas of assessment.

ESG RATING - OPEN-ES

At the end of 2023, Open Fiber joined Open-es as a Value Chain Leader Partner with the aim of promoting the sustainability of its supply chain and understanding to what extent the values of its business are integrated into it. It also measured its sustainability performances, obtaining a **sustainability score of 89/100**.

ESG RATING - CDP

In 2024, Open Fiber completed the **CDP Climate Change** questionnaire for the first time, obtaining a score of "**B**", the highest score at Management level.

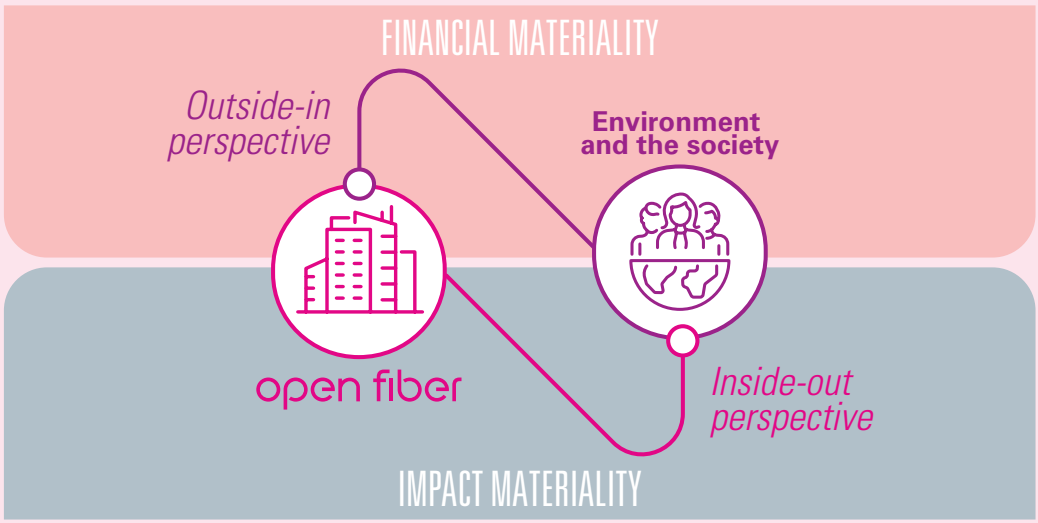
DOUBLE MATERIALITY EVOLUTION

Starting from 2023, Open Fiber has decided to adopt the so-called **double materiality**, thus anticipating the requirements of the Corporate Sustainability Reporting Directive (CSRD)[2] on sustainability reporting. The materiality process implemented not only includes an assessment of **Open Fiber's impacts on ESG issues** (impact materiality), but also integrates the **financial relevance** (financial materiality) of sustainability risks and opportunities and the interdependencies between impact materiality and financial materiality. The double materiality therefore implies evaluating not only the influence of the company on the environment, the economy and society (**inside-out** perspective), but also what is relevant or that can generate risks/opportunities for the business (**outside-in** perspective).

In 2024, the process was further upgraded through the **involvement of a sample of the main stakeholder categories and the conducting of**

focus groups, showing Open Fiber's commitment to the continuous improvement of sustainability governance and the process of reporting its performance.

FIGURE 3: DOUBLE MATERIALITY - INSIDE-OUT AND OUTSIDE-IN PERSPECTIVE



2 EU Directive 2022/2464.

From the combination of impact materiality and financial materiality, 9 material topics emerged, the performance of which is reported in the Sustainability Report:

- Affected communities;
- Business conduct;
- Climate change;
- Biodiversity and ecosystems;
- Circular economy;
- Responsible supply chain management;
- Own workeforce;
- Consumers and end users;
- Privacy and cybersecurity.

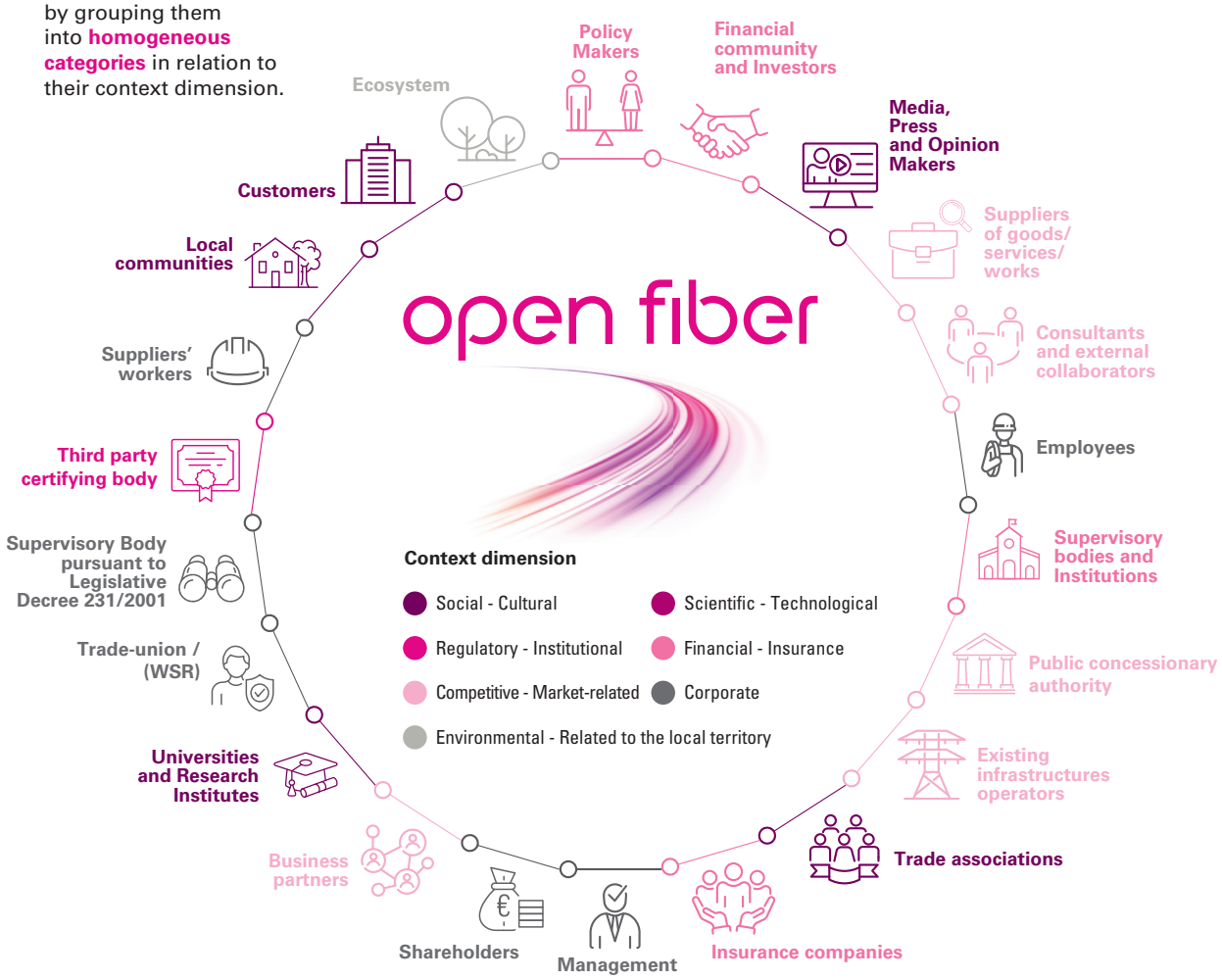
STRENGTHENTING OF THE STAKEHOLDER ENGAGEMENT STRATEGY

Through **ongoing and participatory dialogue** with its stakeholders, Open Fiber gathers valuable feedback on the initiatives it undertakes, assessing their impact and adherence to expectations on environmental, social and governance issues. This asset reinforces the value of the company's choices and ensures greater effectiveness and sustainability over time.

In order to strengthen its stakeholder engagement strategy in relation to sustainability, in 2024 Open Fiber drew up a **Stakeholder Engagement Policy** and launched a training programme aimed at perfecting the communication skills of certain key functions in relation to ESG issues.

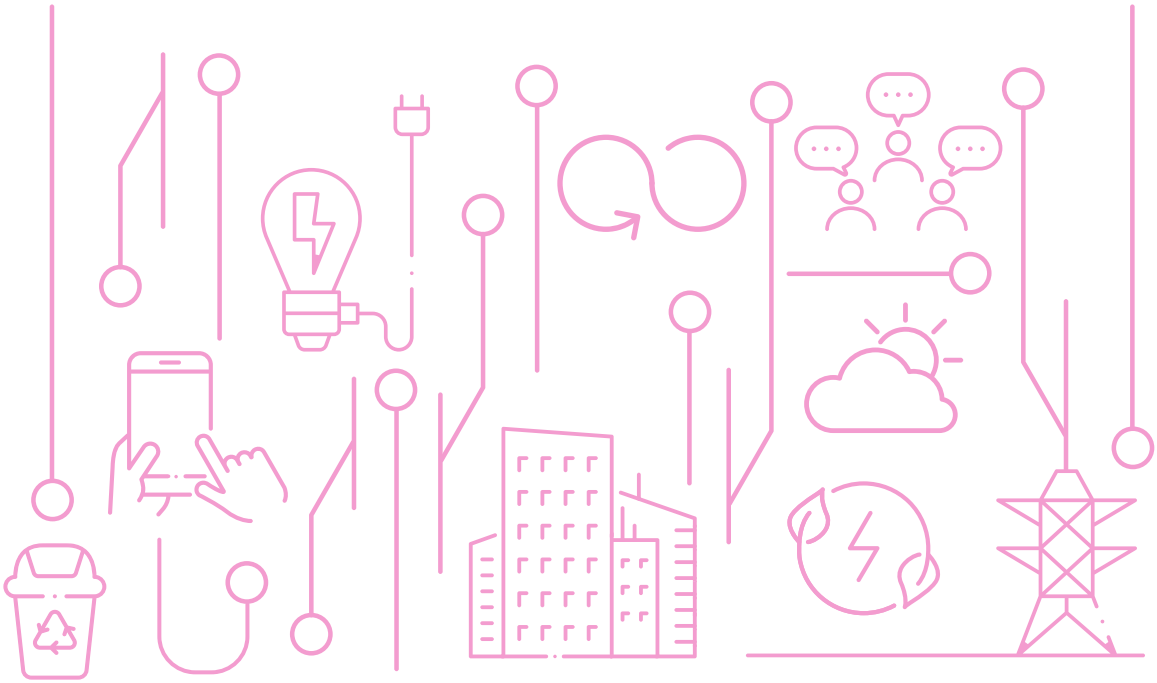
FIGURE 4: STAKEHOLDERS MAP

Open Fiber identified its stakeholders, by grouping them into **homogeneous categories** in relation to their context dimension.



Responsible communication

Value for the community



COMPANY **OVERVIEW**

MISSION, VISION AND ACTIVITIES PLAN

An electronic communication **network of optical fiber at a very high speed**, exceeding 1 Gigabit per second and covering the whole national territory, is "The network that transforms Italy", the cutting edge that Open Fiber has been working on every day since its foundation and that will allow Italy to bridge the digital divide with the rest of Europe. Through its activities, the result of the company's strategic vision, the company aims to guarantee **coverage of the major Italian cities** and the **connection of rural and industrial** areas, with an ultra-fast and reliable network capable of providing increasingly advanced services and functionalities for citizens, businesses and the Public Administration.

MISSION

Travelling all at the same **speed** through optical fiber

VISION

FTTH optical fiber: a real **change** for the Country

In order to tear down digital barriers, promote access to innovative services and contribute to the country's economic and social growth, Open Fiber's business plan envisages connecting over 21 million buildings, distributed across the various Clusters:

- the **black areas**, the main urban centres where Open Fiber is using private investment to create an optical fiber infrastructure (FTTH – Fiber To The Home) that reaches homes and offices;

- the **white areas**, the rural and suburban areas where operators have not declared an interest in intervening. Open Fiber has been awarded the three public tenders launched by Infratel (an in-house company of the Ministry of Enterprise and Made in Italy) to build and manage a public ultra-broadband network for 20 years under licence;

- the **grey areas**, for which the Government, as part of the Italy 1 Giga Plan – which falls under Mission 1 "Digitalisation, innovation, competitiveness, culture and tourism" of the National Recovery and Resilience Plan (NRRP) – has issued a series of calls for tenders to ensure public support for the creation of an ultra-fast network.

At the end of 2024, the Company had covered around 15.9 million households using FTTH technology (Fiber To The Home)[3] thus confirming its position as the main FTTH operator in Italy, among the leaders in Europe, and the first among the wholesale-only operators on the continent. Cabling Italy from large cities to small towns, thus reducing the digital divide and guaranteeing free access to technologies, is an opportunity for Italy in terms of both the economy and employment. To date, Open Fiber employs **over 9,000 people, including internal and external** resources.

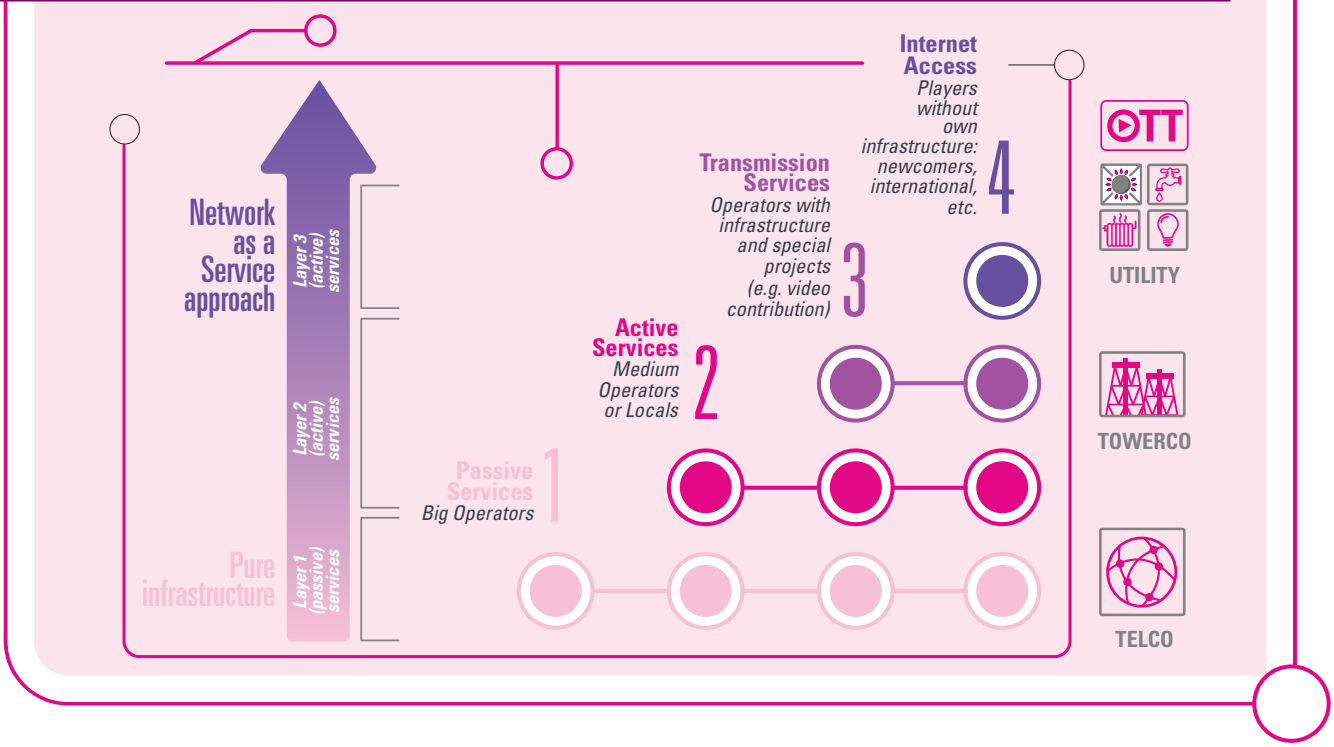
BUSINESS MODEL

Open Fiber is indeed the undisputed protagonist of this period of digital and infrastructural development, both directly, with its activity, and indirectly, with its competitive action. Since its inception, the company has adopted a ***wholesale only*** business model: it does not sell connectivity services directly to end customers, but makes its network available to all interested operators, under the same conditions. This choice guarantees not only free access to over 300 partner operators[4], both national and international, who already signed commercial agreements for the use of the Open Fiber ultra-broadband network, but it also offers users clear benefits in terms of both the variety and the wealth of services available.

3 To which should be added 2.8 million households connected via FWA technology, for a total of 18.7 million connected households as of 31 December 2024.

4 At the end of 2024, around 300 TLC operators (Fastweb, Tiscali, Vodafone, WindTre, EOLO, TIM, AT&T, Retelit, Iliad, Virgin Fibra, PostePay, Aruba), entertainment operators (Sky), energy operators and e-learning operators (Enel, Sorgenia) have chosen Open Fiber as their main supplier of network infrastructure and services.

FIGURE 5: SERVICES OFFERED



The services offered by Open Fiber are divided into two categories: passive services and active services. In the case of **passive services,** the Company makes available its fiber optic access network that connects the exchange - or rather the infrastructure node that hosts the elements of the fixed access network and those of transport/backhauling - to the premises of the associated end customers, while the operator is responsible for connectivity using PON (Passive Optic Network) or P2P (Point-to-Point) access technology. This option is generally used by operators who manage the active part themselves by installing their own network equipment inside Open Fiber's centres. This service model therefore requires the operator to subscribe to the Housing service, which provides a space in which to install their transmission equipment and connect it to the fiber network in order to provide the service to end customers.

The **active services**, on the other hand, require Open Fiber to provide not only the fiber infrastructure, but also connectivity using **GPON** (Gigabit Passive Optical Network)[5] access technology, as well as **XGS-PON**[6] and **P2P** (Point-to-Point) with traffic delivery at an interconnection point or, in some cases, with direct Internet access.

In the **first model**, the traffic generated by the operator's customers is collected and transported through Open Fiber's backbone network, and then delivered in an aggregated manner at an interconnection point. This can take place within an Open Fiber exchange or at an Internet Exchange

5 Gigabit Passive Optical Network: a network in which part of the connection is shared between operators, while the final connection is based on a single dedicated fiber. The passive nature of GPON eliminates the use of electricity, making it possible to install the splitter in places where it is not easy to have power supply. It is also more energy efficient. GPON technology provides unprecedented bandwidth (up to 2.5 Gbps) and greater distance from the central office, allowing service *providers to enable* bandwidth-intensive applications.

6 XGS-PON technology (ITU-T 9807.1 – 2016 standard) is the commercial successor of GPON. It allows a transmission speed of 10 Gbps both downstream and upstream.

Passive Services

- Passive GPON FTTH
- Dark Fiber (dark fiber service)
- Housing

Active Services

- Open Internet
- Open Stream FTTH
- GPON Business Access
- Active P2P
- OTN

Point, ensuring efficiency and reliability in data traffic management. In the second service model, on the other hand, Open Fiber doesn't just provide the access network, but directly manages the Internet access service. This also includes assigning IP addresses to end customers, allowing the operator to guarantee connectivity without the need to invest in infrastructure or network equipment. This approach simplifies market entry and allows operators to focus on providing advanced services to their users. It is an all-inclusive service aimed at small operators but above all at multi-utility companies that intend to expand their offer on the national market with a high-performance, high-quality fiber connectivity service. This service has made it possible for new service providers, including energy sector operators and utilities, to enter the national market.

Since 2021, Open Fiber has used a Customer Satisfaction Survey to measure the progress of the activities and services offered, a repeatable **analysis model capable of analysing the service components that influence the satisfaction of customers** (operators) and then evaluating and examining the data collected both at the customer portfolio level and at the individual Customer level.

The results show that, both for the **areas of**

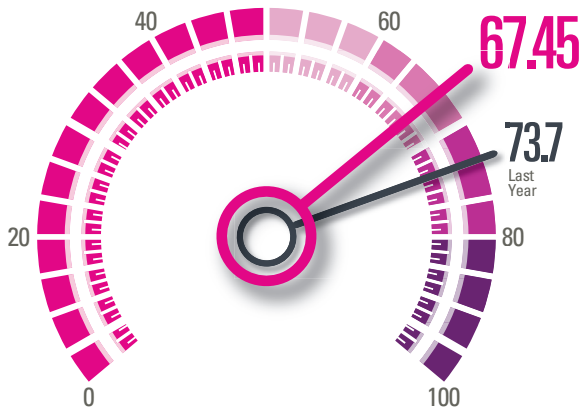
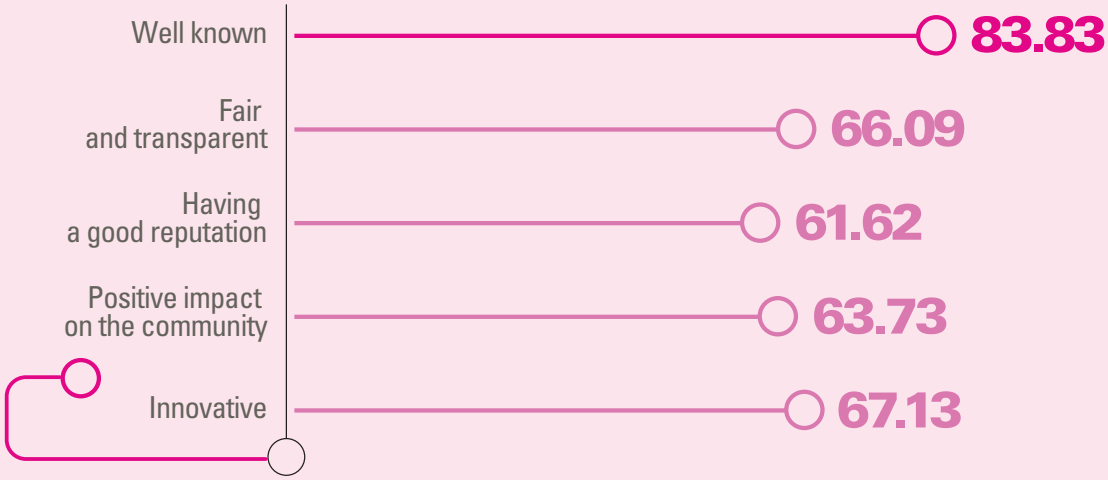


FIGURE 6: 2024 CUSTOMER SATISFACTION SURVEY RESULTS



investigation and for the **qualitative aspects**, the scores obtained are lower than those achieved in the previous survey, which took place in 2023. The highest scores (equal to or greater than 70) were obtained in the **commercial** and **image** areas of investigation.

Through the analysis of the so-called **Open Fiber Satisfaction Index,** a summary of the responses given by all operators, the recognition of the Open Fiber brand in the fiber connection market in Italy is confirmed (in the collective imagination it is identified as an ideal supplier). The data on **brand awareness**, **reliability and positive impacts on the community** (for example, overcoming the digital divide, creating jobs, etc.) are among those highlighted as positive factors.

TRANSPARENCY AND EQUAL ACCESS TO THE BASIS OF OPEN FIBER'S WORK

In its project to create an Ultra-Broadband (UBB) network, Open Fiber is committed to inform and involve all members of local communities, from citizens to associations, from organisations to authorities, not only with regard to the advancement of the infrastructure development plan and the digital services that will be made available, but also with regard to the social, economic and environmental impacts that these activities may generate.

In this regard, in addition to provide free access to the progress of the work in accordance with the information and transparency obligations undertaken as the successful bidder in public tenders, Open Fiber is also committed to disclose the results of the monitoring and impact assessments it carries out on an ongoing basis to interested parties, both through dedicated meetings with institutions (for example during conferences on innovation or digitalisation) and during communication events aimed at the general public (for example press conferences and meetings with associations).

One channel that undoubtedly helps the company keep in touch with the needs and expectations of users is the web, especially social media, where Open Fiber boasts a large and active fanbase with which it interacts directly.

ANTITRUST SAFEGUARD

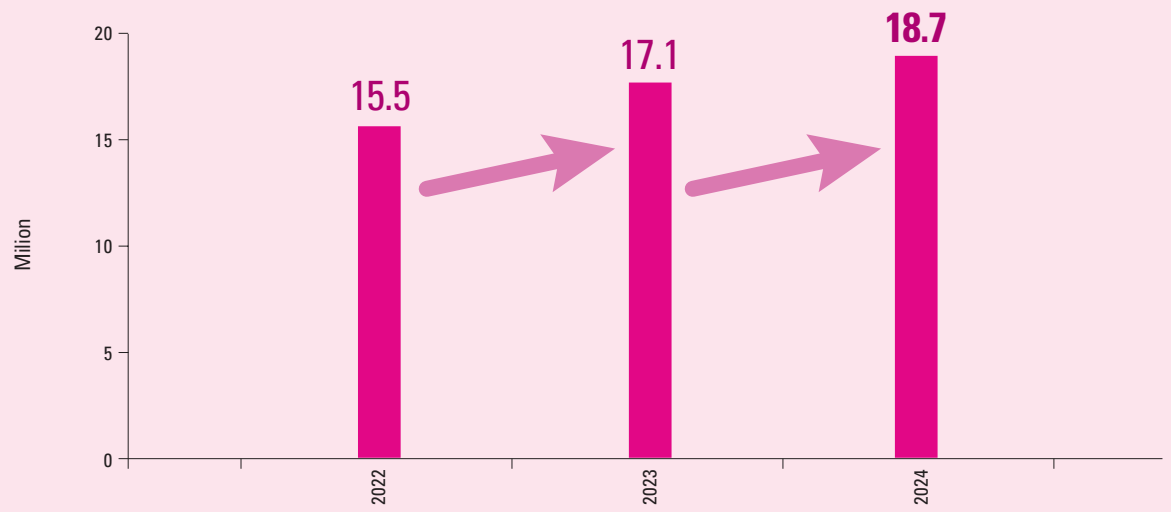
In full compliance with the rules protecting competition, which are an integral part of the Company's culture and daily operational choices, Open Fiber has adopted an **Antitrust Code** that provides all members of the corporate bodies and employees with a systematic framework of reference for the protection of competition. Furthermore, it has appointed an Antitrust Committee that acts as a point of reference for any suspected offences and/or abuses and has exclusive jurisdiction to analyse illegality.

ECONOMIC PERFORMANCE

Business development and network expansion

Over the course of 2024, 1.6 million households were connected, reaching a total coverage of approximately **18.7 million households passed**[7], a **9% increase** compared to the previous year.

FIGURE 7: HOUSEHOLDS PASSED



The total number of **marketed municipalities as of 31/12/2024 is 7,358**, of which 6,615 fall into the C&D Cluster (under concession from Infratel Italia S.p.A.)[8] and 503 into the grey areas of *Piano Italia a 1 Giga*.

TABLES 1: MUNICIPALITIES BEING MARKETED

Description	U.M.	2022	2023	2024
A&B Cluster Municipalities	n.	238	239	240
C&D Cluster Municipalities	n.	4,690	5,840	6,615
Grey Areas Cluster Municipalities	n.	-	145	503
Total marketed Municipalities	**n.**	**4,928**	**6,224**	**7,358**

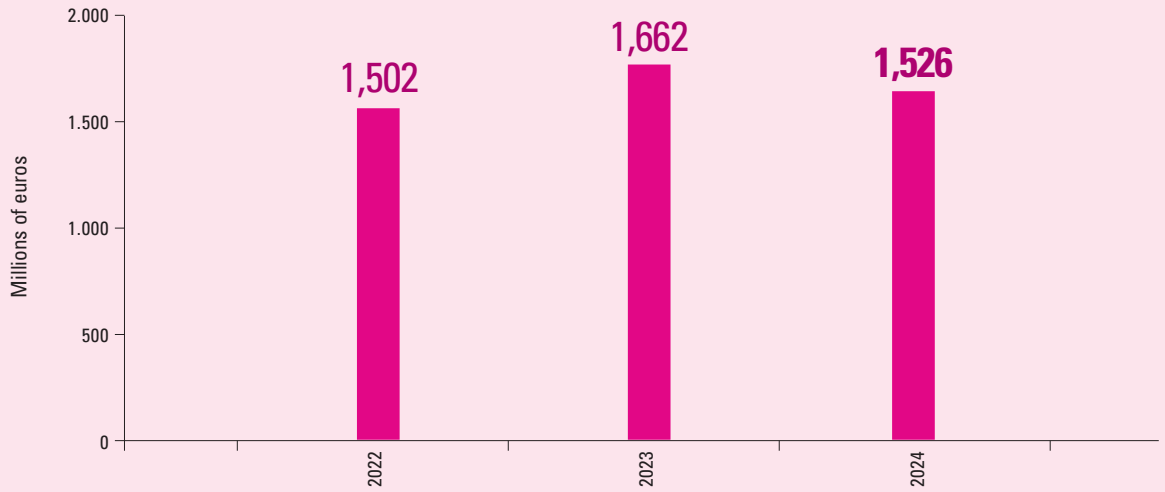
7 Out of these, 2.7 million households were connected using FWA technology in the C&D cluster and 162 thousand in the Grey Areas cluster.

8 With reference to the performance of network development in the areas of market failure covered by the first and second calls for tenders, Open Fiber was only able to start operations in January 2018, after 13 appeals against the award of the Infratel concessions, which significantly delayed the signing and the complex definition of the Operating Manual for the tenders for the award of the works. Activities for the regions included in the third call for tenders were launched in the second half of 2019 following the signing of the Concession in April 2019.

Investments

The Company's overall investments[9], which in 2024 amounted to **1,526 million euros**, are mainly related to the construction of the network and network infrastructures, as well as the acquisition of usage rights for third-party infrastructures (IRU[10]), the development of software and IT equipment, improvements to third-party assets both related to the network infrastructure and the Company's offices, as well as the creation of the licensed network.

FIGURE 8: OVERALL INVESTMENTS IN THE 2022-2024 PERIOD



PROJECT FINANCING IN SUPPORT OF THE BUSINESS PLAN

On 14th of February of 2022, the Company signed a loan agreement with a pool of banks for a committed amount of up to a total of 7,175 million euros. At the beginning of 2025, it entered into an additional committed term loan facility (so-called Incremental Debt Facility, IDF) for an additional 1,050 million euros, intended to cover the company's needs as foreseen in the latest approved Business Plan and is the largest ever made in EMEA (Europe, Middle East and Africa) for investments in telecommunications networks.

9 Overall Investments – these include all the resources used by the Company to create its own network infrastructure and the network under concession, excluding rights of use in accordance with IFRS 16, financial charges in accordance with IAS 23 and gross of the portion of the contribution on the network under concession.

10 Indefeasible Right of Use.

Generated and distributed economic value

Open Fiber pays special attention to sustainability and is therefore committed to achieve these objectives also from an economic point of view, through the generation and distribution of economic value not only for the company, but also for its stakeholders.

FIGURE 9: TREND OF THE VALUE GENERATED, DISTRIBUTED AND WITHHELD IN THE 2022-2024 PERIOD

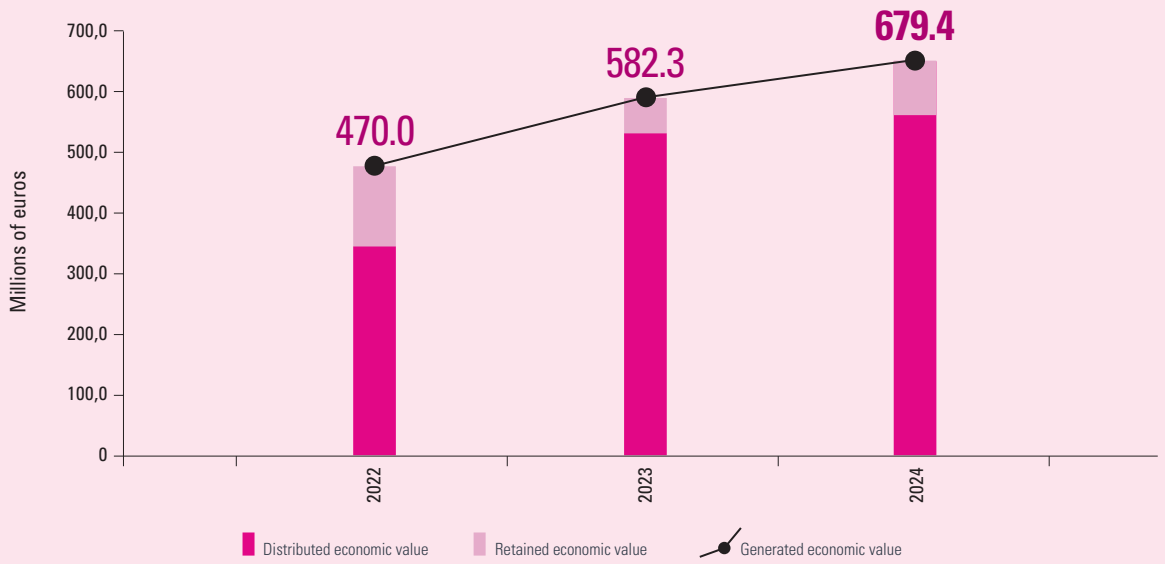
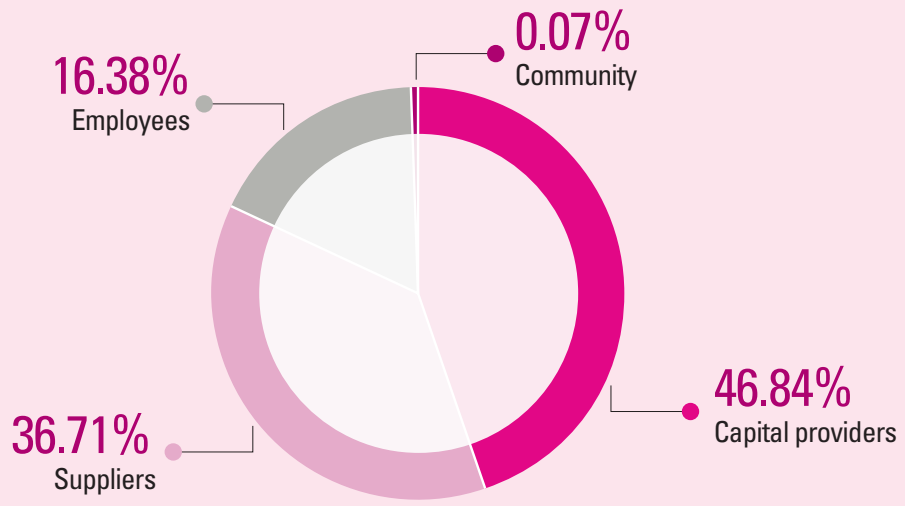


FIGURE 10: DISTRIBUTED ECONOMIC VALUE



OPEN FIBER NETWORK SOLUTIONS: ACTIVE TO UNITE THE COUNTRY

Open Fiber Network Solutions

Open Fiber S.p.A., along with Amplia Infrastructures S.p.A. and C.I.E.L S.p.A.[11], founded the **Open Fiber Network Solutions S.c.a.r.l.** consortium in 2022, primarily with the aim of supporting the company's strategic plan for the construction of fiber optic infrastructure in the white and grey areas covered by the agreements signed between Open Fiber and Infratel Italia S.p.A.

The Consortium aims to provide a concrete solution to the shortage of specialised labour and expand the production capacity of the network of all the network companies available on the market, thus promoting the implementation of the BUL Plan and the *Bando Italia a 1 Giga*. During the Shareholders' Meeting, dated 10 December 2024, its duration, initially planned for 5 years, was extended to 10.

The Consortium, already equipped with an Organisation and Management Model pursuant to Legislative Decree 231/2001, carried out the audits for the maintenance of the **certifications** in 2024 according to the international standards **UNI EN ISO 9001, UNI EN ISO 14001** and **UNI ISO 45001** (Management Systems for Quality, Occupational Health and Safety and Environment). It has kept the **SOA certification** (OG1, OG3, OS19[12]) and the certification necessary to operate on the low and medium voltage electrical infrastructure.

2024 PERFORMANCES

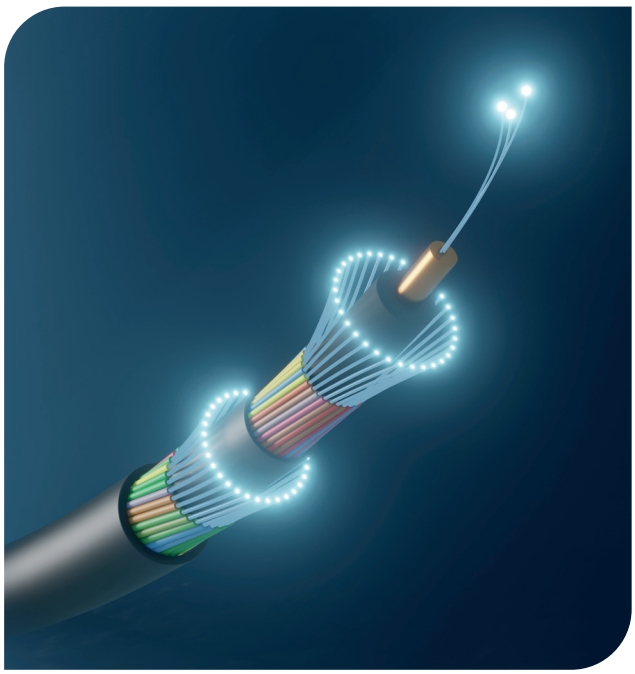
Open Fiber Network Solutions

17 associate companies

43 subcontractors activated

340 average resources in the field

Over **1,600 km** of infrastructure created



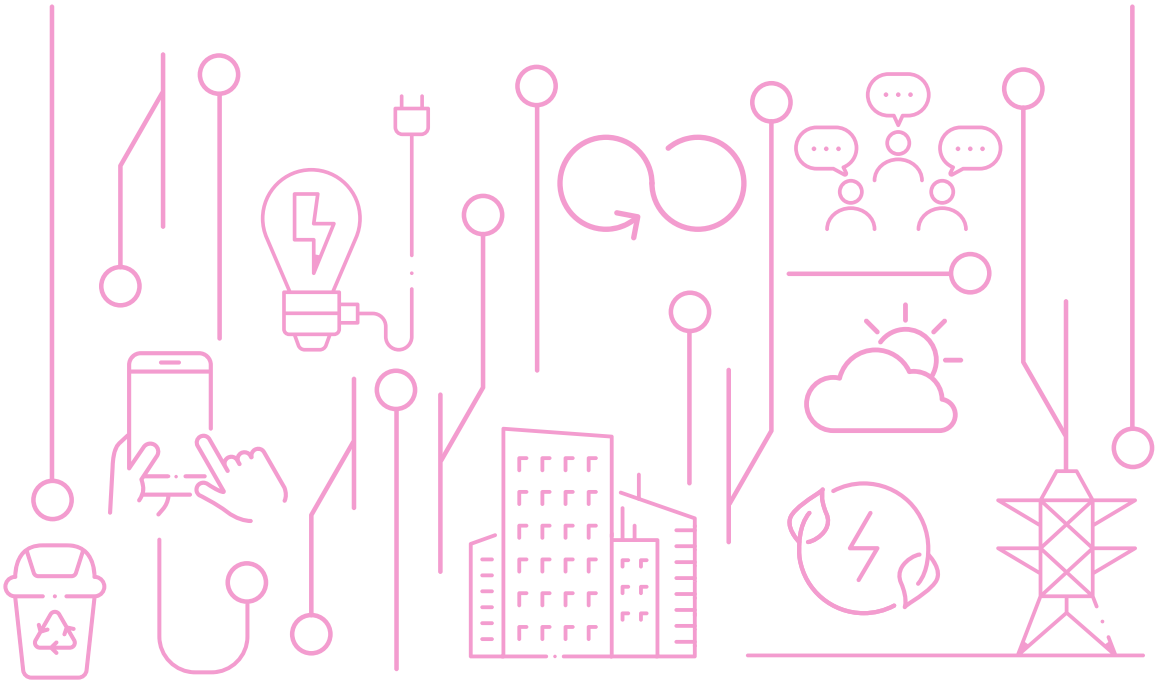
11 Open Fiber Network Solutions S.c.a.r.l. was established on 24th March 2022 as a permanent consortium (pursuant to art. 45 of Legislative Decree 50/2016, the so-called "Procurement Code") in the form of a limited liability company. The Consortium is expected to last 10 years.

12 Categories of Works OG 1 "Civil and industrial buildings", OG 3 "Roads, motorways, bridges, viaducts, railways, undergrounds" and OS 19 "Installations of telecommunications, transmission and treatment networks"

Fighting climate change

Circularity

Sustainable value chain



FIGHT AGAINST CLIMATE **CHANGE** AND **PROTECTION** OF RESOURCES

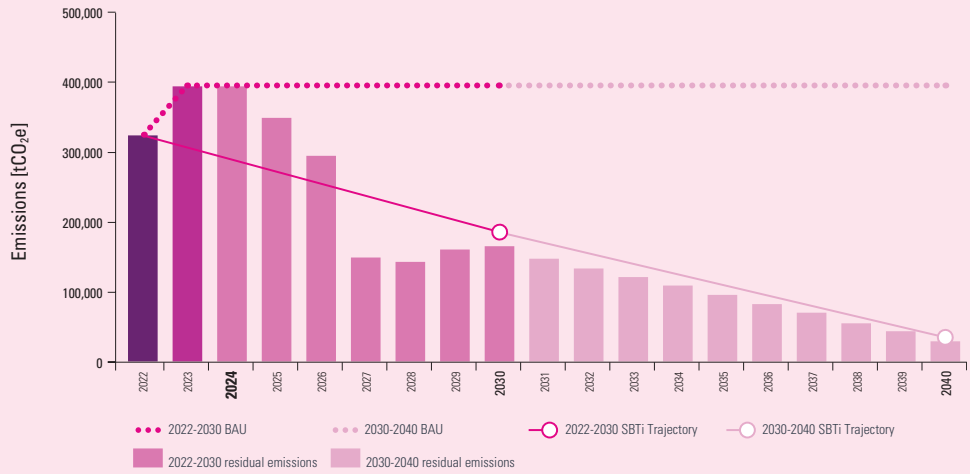
TOWARDS NET ZERO

The fight against climate change requires concrete action. Open Fiber is well aware of this and decided to take up the challenge of decarbonisation by setting itself targets that have been validated by the **Science Based Targets initiative (SBTi).** The company is now officially among those committed to ensuring a *Net Zero* future.

In this regard, Open Fiber has promoted a corporate climate strategy in line with the goal set by the Paris Agreement, according to the highest level of ambition identified by the *Science Based Targets initiative*, namely greenhouse gas emission reduction targets aligned with 1.5°C:

- **Scope 1&2**: reduction of absolute emissions by 42% by 2030 and by 90% by 2040, compared to the base year 2022;

FIGURE 11: NET ZERO PLAN - SCOPE 1, 2 & 3 DECARBONISATION SCENARIO



- **Scope 3** (with reference to the categories "Purchased goods and services" and "Capital goods"[13]): reduction of absolute emissions by 42% by 2030 and by 90% by 2040, compared to the base year 2022.

The evolution of Open Fiber's business as outlined in the guidelines of the Business Plan, together with the Company's Energy Plan and external decarbonisation scenarios, constitute the key elements for the company's decarbonisation path. In addition to this, there are further **challenging actions** (defined as **supplementary and enabling**) to be adopted to achieve the science-based reduction targets for 2030 and 2040 and the future commitment to use carbon removals to neutralise emissions not reduced by 2040. The main actions planned were taken starting from 2024 and concerned:

- the installation of energy meters in the offices, for a more efficient management of consumption;
- the temporary switching off of the air conditioning systems in the offices during collective closures;
- the progressive conversion of the car fleet with mild hybrid vehicles.

Moreover, as part of its decarbonisation plan, Open Fiber has adopted the **Beyond Value Chain Mitigation** (BVCM) strategy proposed by SBTi, implementing mitigation measures outside its own value chain and helping to accelerate the global transition to zero emissions. These initiatives support other economic and social actors in reducing or eliminating greenhouse gas emissions. During 2024, the Company purchased 4,540 carbon credits, which made it possible to **offset Scope 1 and Scope 2** emissions for the year 2023. The **correct offsetting** was **verified by an independent third-party verification** body, with the issue of the relevant certificate. The credits purchased, certified by VERRA according to the Verified Carbon Standard[14],are related to a project for the **production of photovoltaic energy in India**, which is in third place in the ranking of countries most responsible for greenhouse gas emissions, after China and the United States[15].

13 The categories "Purchased goods and services" and "Capital goods" are equivalent to approximately 98% of Scope 3 emissions of the base year.

14 Verra is a non-profit organisation that develops and manages standards for sustainable development, climate action and responsible business practices. The Verified Carbon Standard (VCS) is the world's most widely used greenhouse gas (GHG) accreditation programme.

15 Global Carbon Atlas, https://globalcarbonatlas.org/

OPEN FIBER'S CARBON FOOTPRINT

FIGURE 12: INVENTORY OF GHG EMISSIONS FOR OPEN FIBER S.P.A.

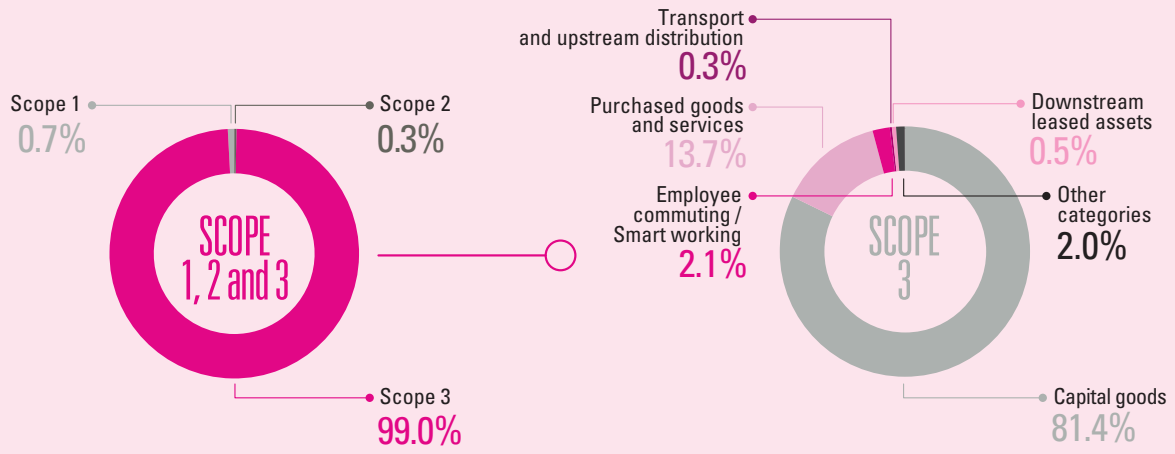


FIGURE 13: EMISSION INTENSITY TREND (SCOPE 1 AND 2) PER HOUSEHOLDS PASSED (KGCO$_2$E/HP) - OPEN FIBER S.P.A.

Open Fiber S.p.A.'s emission inventory in 2024 included:

- 2,685 tons of CO_2e for Scope 1 and 2 emissions (respectively, 1,838 tCO_2e and 847 tCO_2e), with an average intensity of 0.14 kg of CO_2e per households passed, taking into account 18.7 million households passed;
- 276,800 tons of CO_2e for Scope 3 emissions, mainly due to the categories "Purchased goods and services" and "Capital goods", which represent approximately 95% of total Scope 3 emissions.

As for the Consortium, in 2024 2,691 tons of CO_2e for Scope 1 and 2 emissions (respectively, 2,682 tCO_2e and 9 tCO_2e) were recorded. Since the Consortium is involved in the construction of Open Fiber's fiber optic infrastructure, Scope 3 emissions are already included in Open Fiber's reporting of other indirect emissions.

PILLARS OF OPEN FIBER'S ENERGY MANAGEMENT SYSTEM

COMPETITIVENESS

Implementation of a **Company energy policy** that can identify inefficiencies, allowing to generate the same service level in spite of a net reduction in the resources used.

TECHNOLOGICAL INNOVATION

Pursuit of efficiency by applying cutting-edge technological solutions, which can increase the Company assets' value and performances.

ENVIRONMENTAL SUSTAINABILITY

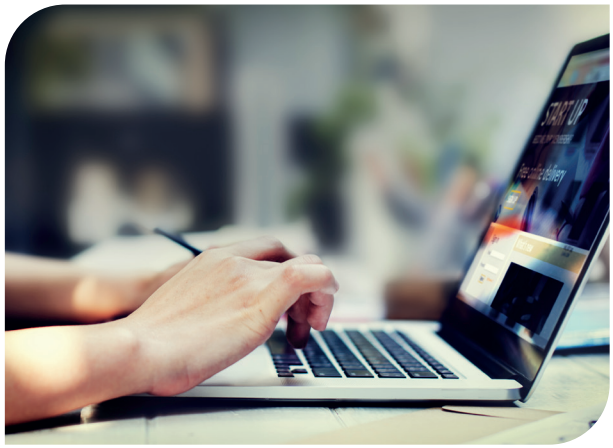
Speeding up the level of business sustainability, in line with the Company's funding value, in favour of the circular economy and the green economy.

BUSINESS EVOLUTION

Energy efficiency as a means to look for new models of business/revenues stream, which can diversify the service offering.

RESPONSIBLE ENERGY USE

Open Fiber adopted an energy policy that focuses on innovative and sustainable solutions to optimise efficiency and reduce environmental impact. To this end, the Company implements an Energy Management System complying with standard **UNI CEI EN ISO 50001**[16], certified in 2023 and aimed at a structured management of the consumption generated by office buildings, technological sites and the company car fleet.



ENERGY PLAN

Open Fiber's **Energy Plan** is the strategic tool with which the Company intends to achieve its objectives of **increasing efficiency** and rationalising its consumption and, consequently, reducing its carbon footprint, thanks also to the use of renewable energy. This Plan includes two categories of interventions:

- **Infrastructural interventions** on premises, technological sites and motor vehicles;
- **Operational management interventions** on the Company's processes;

Within such framework, Open Fiber has:

- planned to integrate an energy consumption monitoring system based on Internet of Things (IoT) technology to be installed in the technology sites and office premises;
- purchased electricity exclusively from renewable sources;
- experimented with the construction of photovoltaic systems to serve some of the network's technology sites: **Settimo Milanese**, **Castelnuovo di Porto**, **Casoli**, to which **Anguillara Sabazia** and **Novi Ligure** will be added in 2024;
- undertaken a plan to convert the car fleet from thermal to mild hybrid.

16 Energy Management Systems – Usage requirements and guidelines.

An analysis of Open Fiber's energy performance shows that the Company's main areas of consumption are: the use of electricity for company offices and technological sites (about 91% of the total energy consumed); the consumption of diesel and petrol by the company car fleet (about 8%); the use of natural gas for office heating (about 1%). For the Open Fiber Network Solutions Consortium, on the other hand, almost all consumption is attributable to the use of fuel for the vehicle fleet (approximately 99.7%), with a small amount of electricity for the operation of warehouses (approximately 0.3%)[17].

As regards electricity consumption, in 2024 a share of approximately 185,866 GJ of energy from **renewable sources** was reached (through Guarantees of Origin)[18], namely 74% of the total energy consumed by Open Fiber and the Consortium.

The increase in overall consumption observed in 2024 is due to the growth of households passed- and consequently in technological sites, on-field personnel and personnel within company offices - and in the activities of the Open Fiber Network Solutions Consortium, which contributes with a share of over 40,642 GJ of energy consumption in the reporting year.

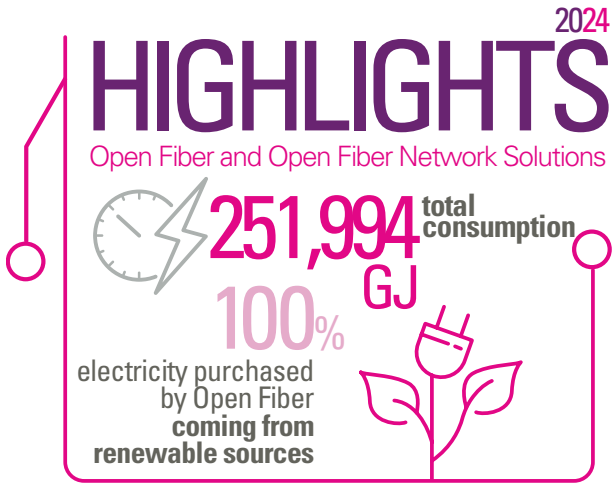
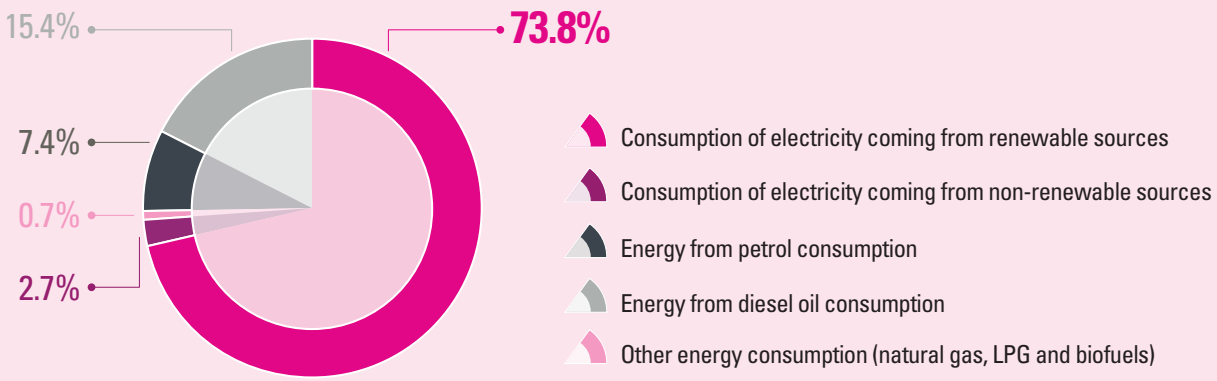


FIGURE 14: ENERGY CONSUMED INSIDE THE ORGANISATION - OPEN FIBER AND OPEN FIBER NETWORK SOLUTIONS



17 The share linked to the consumption of fuel for heating amounts to approximately 0.01%.

18 The energy procured and certified by means of Guarantees of Origin (as provided for in Directive (EU) 2018/2001) comes from renewable sources, as certified by the certification system managed by the Energy Services Manager in accordance with current legislation.

INFRASTRUCTURE WITH A LOW ENVIRONMENTAL IMPACT

Open Fiber's network reliability is due to:

Accurate end-to-end management, including:

- the strategic planning of the nationwide coverage;
- the adoption of advanced technological solutions for the implementation of the network (Network Creation activities)
- the management of Delivery services (connection between the real estate unit and the fiber optic network or FWA) and Assurance (maintenance and prevention of potential causes of network damage).

Strict control of materials: all components that make up the fiber optic network are subject to strict technical specifications defined by Open Fiber (for the A&B Cluster) or jointly with the grantor Infratel Italia (for the C&D Cluster and *Piano Italia a 1 Giga* lots).

Monitoring and supervision of the proper functioning of the infrastructure throughout the country, performed by the Service Operation Centre (SOC), active 24 hours a day throughout the year, in order to safeguard not only the structure, but also the continuity and quality of service to its customers

CREATION PROCESS

1 EXPLORATION PHASE

- collection of information such as the number of buildings to be wired and the number of households passed (HP) to be connected;
- evaluation of the possibility of laying fiber using existing infrastructure or through new works;
- release of communication and authorisation forms[19] and census based on an inspection of the buildings.

2 DESIGN PHASE

- development of a "general plan", which defines the work to be carried out, the type of installation, the size of the network elements, and the positioning of the street cabinet;
- verification, positioning and connection of the PoPs (Points of Presence), the infrastructure nodes that host the fixed access network elements and the transport/backhauling elements;
- project approval and request for authorisation from the competent offices.

3 CREATION PHASE

- creation of the FTTH connection system, through which the PoPs are created and connected to the households by optical fiber;
- execution of the fiber grounding works, installation of the street cabinet and the Building Termination Point (BTP) or Advanced Termination Point (ATP) to reach individual homes, offices, businesses and public administration offices;
- testing of the sections.

4 RECOVERY PHASE

- recovery of the road surface, minimising inconvenience for citizens and trying to be as non-invasive as possible on the territory.

5 SERVICE ACTIVATION PHASE

- the end Customer signs the contract with the operator with whom Open Fiber concludes commercial agreements aimed at providing the service.

6 INSTALLATION PHASE

- Open Fiber receives an "Activation Request" from an operator with all the customer's details, books the network resources and contacts the customer to arrange a visit to the user's home.

19 For example: notice of the start of works, authorisation to install and operate the FTTH fiber optic network built by the Municipality, authorisation to access the building.

Open Fiber adopts a careful and responsible approach, carefully assessing both real and potential environmental and social impacts, and constantly monitoring its activities. The company's goal is to minimise the negative effects on the territory in every phase of the process, starting from a design that favours the reuse of existing infrastructures, thus limiting the need for new works and the impact on the community. In addition, low environmental impact excavation technologies are used, ensuring a sustainable and respectful intervention on the territory.

The positive impact of fiber optic networks on the environment is even more significant when compared to the environmental performance of traditional copper networks.

FIBER OPTIC CABLES PRODUCTION

The core of the infrastructure created by Open Fiber is made up of optical fibers, a set of filaments of glass or polymeric materials. The basic material of which the optical fiber is composed is glass[20], coated with acrylic resins, in order to give the fiber the mechanical strength necessary to be able to handle it and wind it onto reels.
Compared to a copper wire about 60 meters long, the production of a fiber optic cable of the same length produces 0.06 kg of CO_2e, less than 0.01% of the emissions associated with copper.

TRANSPORTATION AND LAYING FIBER OPTIC CABLES

Optical fibers are smaller and lighter than copper cables and this feature allows the use of low-impact alternative excavation techniques during the infrastructure construction phase, which also result in faster installation times. This reduces not only the time required to build the network, but also the emissions associated with the work.

FIBER OPTIC NETWORK OPERATION

Optical fiber networks are "passive" networks, meaning they do not require a continuous supply of electricity and do not generate electromagnetic dispersion in the environment. Furthermore, they use fewer active devices than traditional copper networks, which require amplifiers over distances of around 100 m-2 km, while fiber can support 100 km without amplifiers. Over an area of 40 km^2 this is equivalent to having hundreds of active nodes for copper networks compared to a single active node for FTTH networks.

FIBER OPTIC NETWORK MAINTENANCE AND END OF LIFE

As for its lifespan, it is estimated that the optical fiber cable lasts between 25 and 38 years[21] thanks to a structure that makes it resistant to both mechanical and thermal phenomena. It is therefore the best solution even in extreme weather conditions, because it is less subject to deterioration caused by high humidity, frost or electrical interference.

USE OF A FIBER OPTIC CONNECTION

Compared to the copper connection, there is an additional environmental and economic advantage linked to the different performances that were also recorded by end users. Considering constant and uninterrupted use, a copper cable connection involves an energy consumption per user of 10 Wh, which drops, instead, to about 2 Wh with a fiber optic connection, generating an estimated average saving of 8 Wh per user.

20 For example, oxide-based compounds, such as silicon, phosphorus and/or germanium oxide.

21 Source: Carbon Smart "Our digital infrastructure needn't cost the earth".

INNOVATIVE AND SUSTAINABLE LAYING MATERIALS UNDER STUDY

In order to strengthen its green approach to managing the materials used to build the network, Open Fiber has successfully experimented with an innovative solution to reduce the weight of the **concrete manholes**. This has been made possible by reducing the thickness and optimising the composition, using different types of concrete in smaller quantities. All this without compromising the mechanical characteristics, thus guaranteeing the same performance as the original product with a lower environmental impact.
The possibility of reducing the materials used per single package and using completely recyclable materials for a lower impact on the environment is also being studied and scouted.

NON-INVASIVE LAYING TECHNIQUES

The first choice for laying Open Fiber's optical fiber network is the reuse of **existing infrastructure**, as it avoids negative impacts on the environment and the community from the outset. To this end, in 2024 the Company strengthened its collaboration with partners such as Ultranet and Unifiber, thus upgrading the FTTH network through existing network infrastructures, in support of the ***Piano Italia a 1 Giga*** (Italy at 1 Giga Plan) created with PNRR funds.
When the reuse of existing infrastructures is not possible, Open Fiber adopts non-invasive techniques, such as the technique of **mini-trenching**[22], which has the advantage of radically reducing the volume of soil to be removed and sent for recovery or disposal and, consequently, a lower consumption of resources linked to the inert material necessary for backfilling, with the consequent additional transport that constitutes a further factor of environmental impact. The excavation system involves the creation of trenches approximately 5 centimetres wide; for this reason it is not necessary to close roads to traffic. In addition, the installation is very quick and the road can be reopened to traffic in a short time.

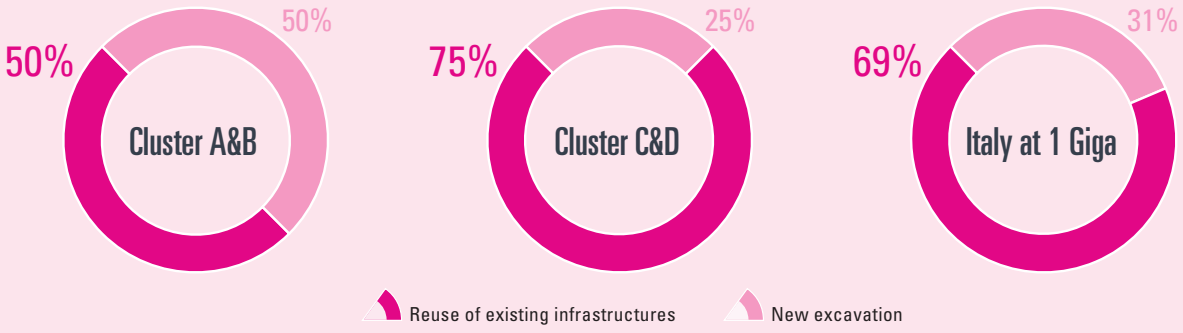
Another example is the **micro-trenching** technique, an even more advanced system that can be used under specific environmental conditions. Micro-trenches are extremely small (only 2.5 centimetres wide and a maximum of 30 centimetres deep, at the kerb) and reduce the number of machines needed, thus streamlining the operations involved in opening and closing construction sites. Simply reducing the size of the excavation to 3x30 cm means a reduction of about 75% in the volume of soil to be removed, corresponding to more than 40 tonnes of material for a 1 km section.
As an alternative to these two systems there is another excavation technique with a greatly reduced impact, the **no-dig** technique, which consists of the remote controlled perforation of the ground, where pipes are placed and cables are then run inside them.
In 2024, Open Fiber continued to make significant progress in the construction of the fiber optic network in Italy. As of 31 December 2024, in the **C&D Cluster**[23], the Company laid over 84,500 km of ultra-fast network, reaching 94% of the planned total. Overall, it built over 140,000 km of infrastructure, of which 46,000 km in **the A&B Cluster**[24].

22 Trenchless technology that allows the laying of service networks through the simultaneous or separate execution of small-scale resurfacing of the road surface, installation of infrastructure and/or cables and filling with cement mortar. Source UNI/PdR 7:2014.

23 With reference to the new excavation activities for the C&D Cluster, Open Fiber resorted to mini-trenching and micro-trenching in 64% of cases, to the traditional excavation technique in 23% of cases, and to the *no-dig* excavation technique in the remaining 13% of operations.

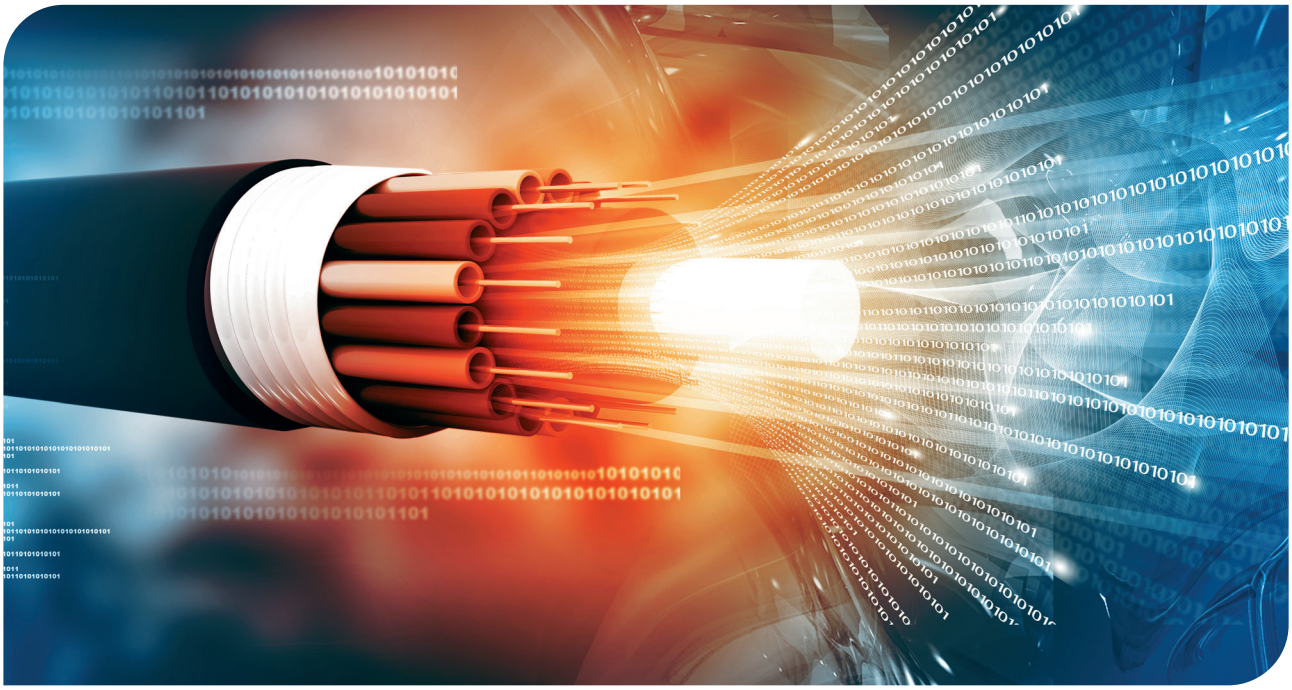
24 The new excavation activities for the A&B Cluster are unchanged from 2023 as work did not continue during 2024.

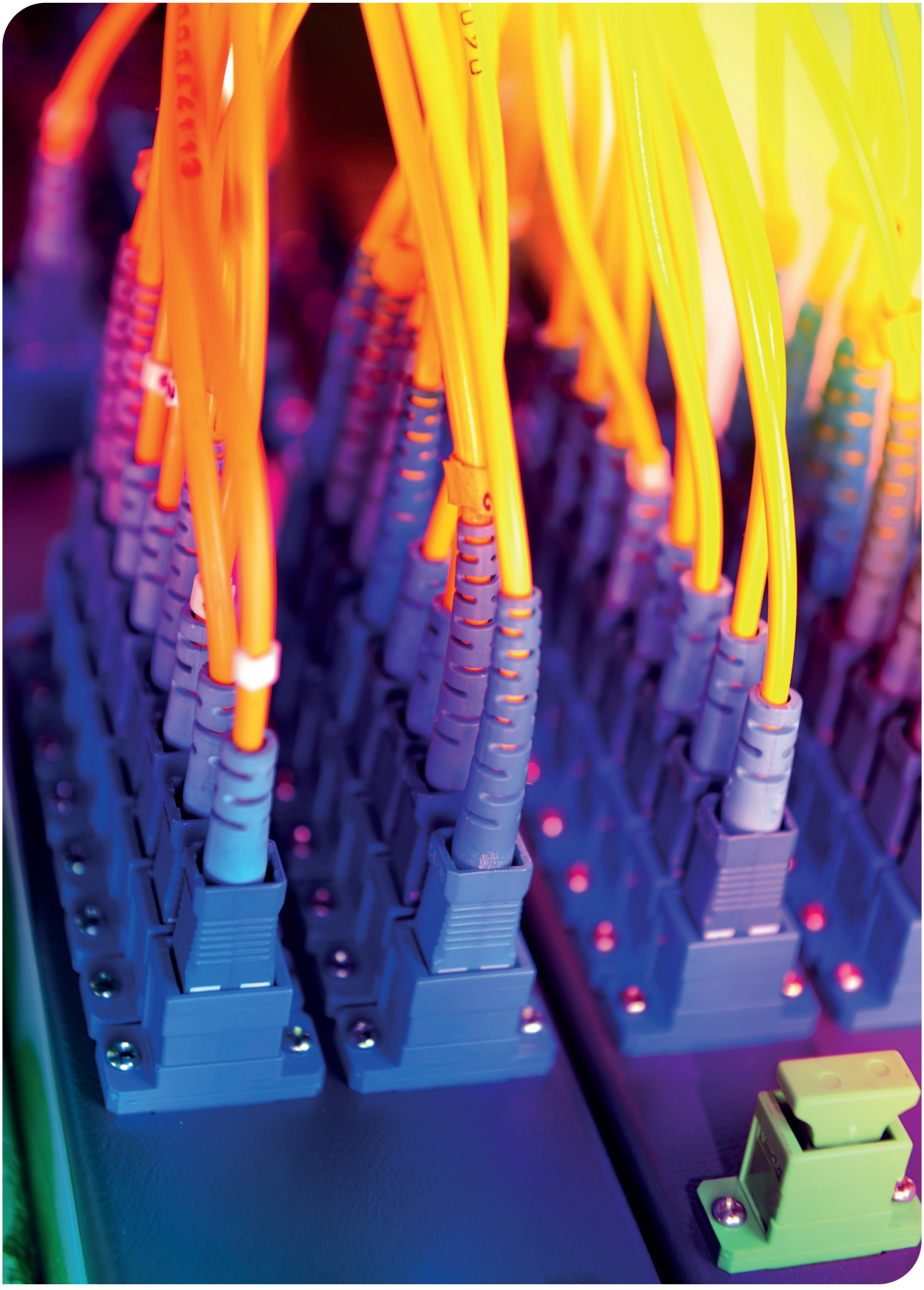
FIGURE 15: EXCAVATION METHODS FOR THE DIFFERENT CLUSTERS



WASTE MANAGEMENT

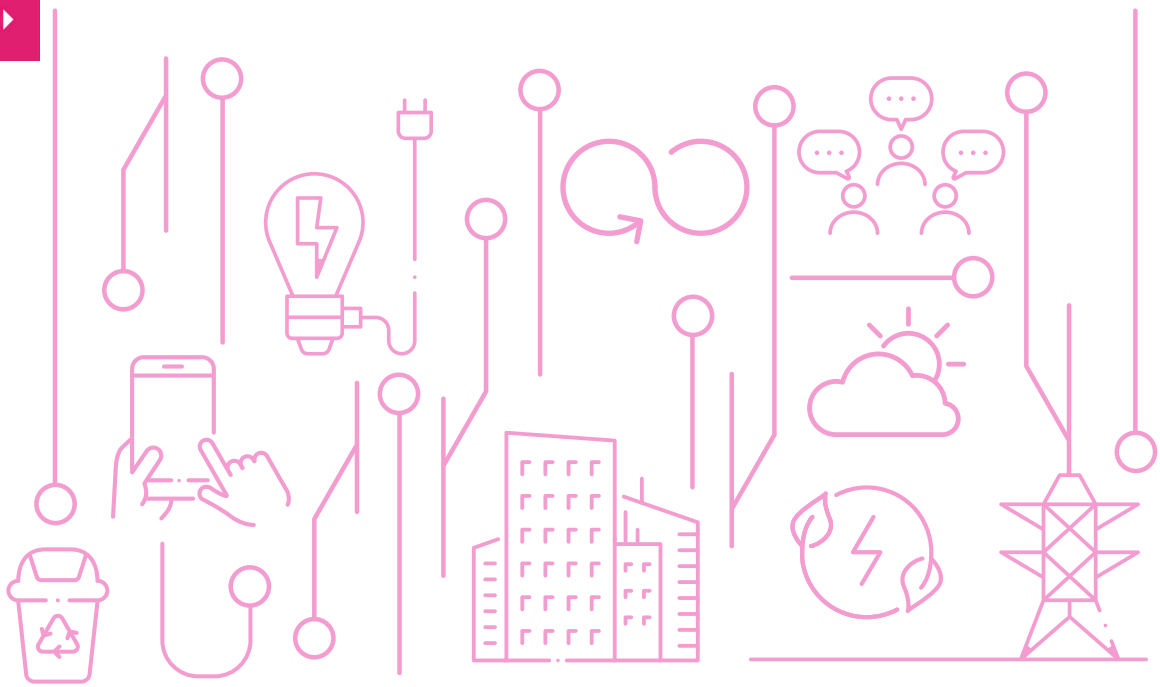
Due to its focus on environmental sustainability, Open Fiber decided to analyse the impact of its activities in greater depth, with a specific focus on waste production and management. In the case of the company, this mainly consists of waste similar to urban waste, deriving from office activities. The company has extended this assessment to the entire value chain, with the aim of identifying targeted actions to improve its environmental performance.





Protection and development of human capital

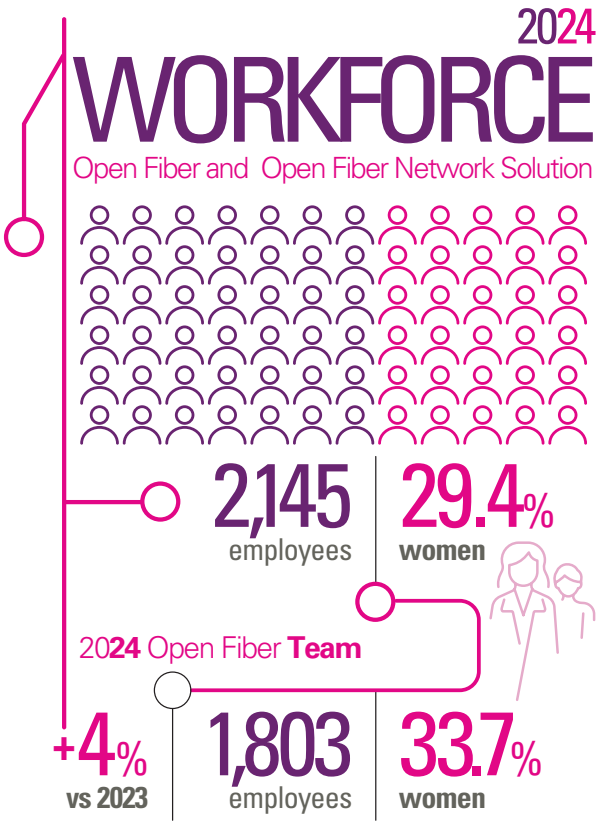
Diversity, Equity & Inclusion



HUMAN CAPITAL

OUR PEOPLE

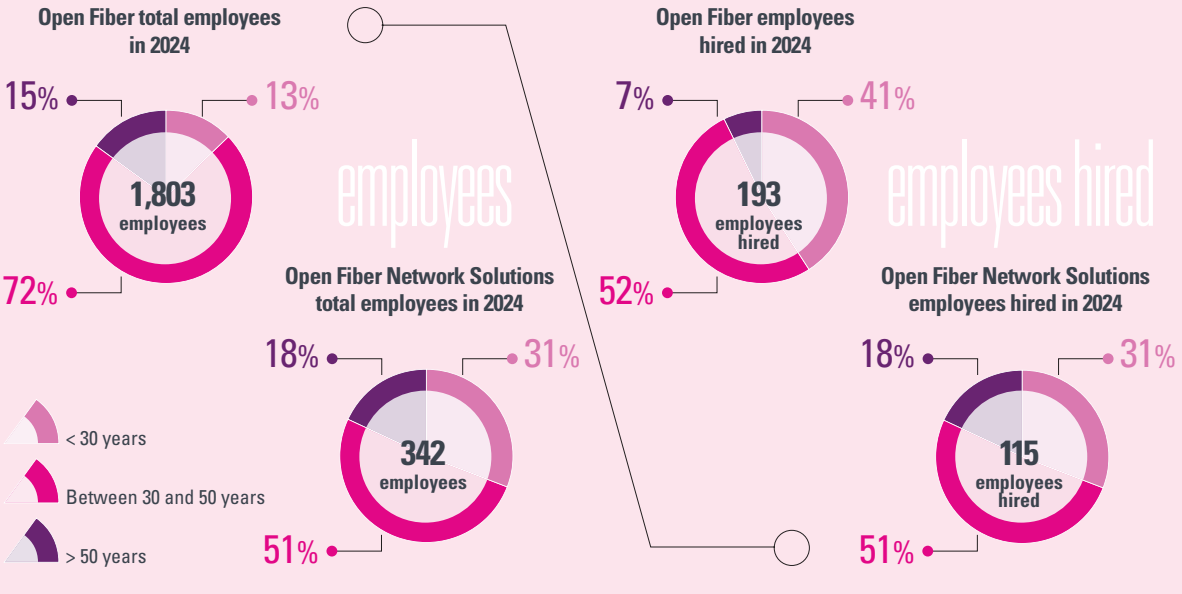
People make the difference in business development processes. For this reason, Open Fiber is committed to creating a unique environment in which everyone can express their skills and talent. With this in mind, in 2024 a new strategic business approach was launched that guides and inspires every single action of Open Fiber, whose values are represented in the **Triple A: Ambition, Action, Accountability and Team Spirit**. **Ambition** means being a leader in digital transformation: the company is committed to valuing talent and increasing the training of each person so that they can be a protagonist of this evolutionary process and contribute to collective success. **Action** is synonymous with proactivity, through which ideas are transformed into reality. Open Fiber promotes a culture of doing, in which initiative is appreciated and rewarded. **Accountability** means knowing how to share responsibilities, focusing on a culture of trust and collaboration, where everyone



is aware of their impact on other people and on the Company. At the basis of all the company's results is the **Team Spirit** that guides Open Fiber's people towards the achievement of common goals through inclusive leadership and real cooperation, where every voice counts.

Over the course of 2024, Open Fiber's team increased its workforce, reaching 1,803 employees as of 31 December (an increase of approximately 4% compared to 2023), mostly concentrated in the cities of Rome and Milan: women make up 33.7% of the workforce (in line with 2023) and the majority of employees are between 30 and 50 years old (72.2%), followed by those under 30 (13.2%).
In the same year, Open Fiber Network Solutions reached a total of 342 employees. The workforce is characterised by a preponderance of men compared to women (6.4% of employees) depending on the type of business, and the majority of employees are in the 30-50 age group (51%), followed by the under 30s. (equal to 31%).

FIGURE 16: OPEN FIBER AND OPEN FIBER NETWORK SOLUTIONS PERSONNEL - DISTRIBUTION BY AGE GROUPS



The strategic role recognised to human capital also takes on significant value in the **quest for new talent**, a constant and essential process that enriches Open Fiber with innovative ideas and new skills.

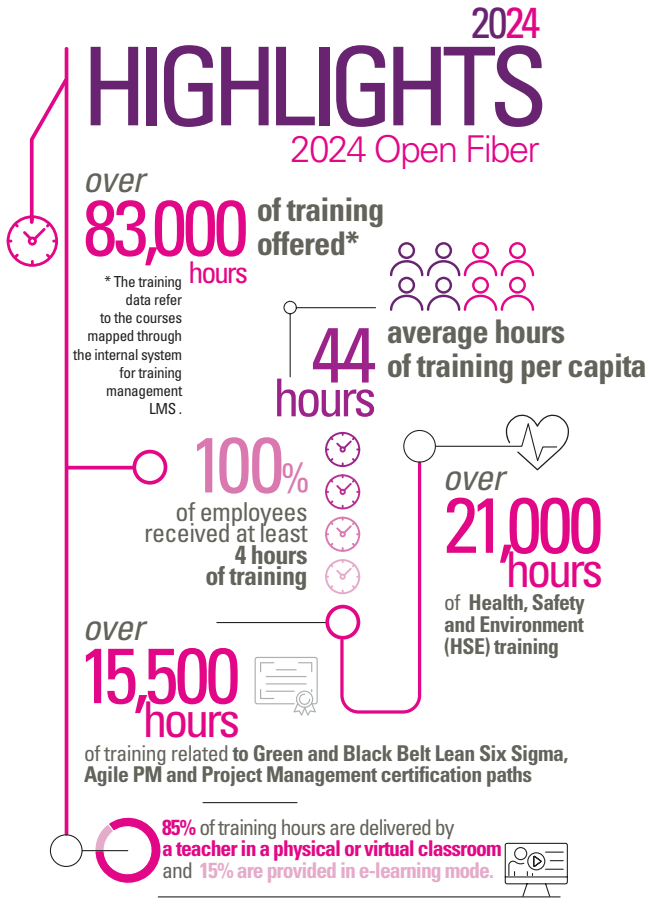
Open Fiber's strategy to attract new talent and enhance its employer branding is developed mainly through:

- the implementation of different attraction channels and sourcing tools such as the Company database and the "Careers" section of the Company website, thanks also to the support of external head hunting companies and the use of the main social recruiting platforms;
- the strengthening of **talent attraction** of target candidates, through participation in innovative and **digital-oriented** initiatives, favouring the positioning of the Open Fiber brand with a view to becoming Best Digital Workplace;
- the support and promotion of projects with **social impact**, such as the PCTO (formerly school/work alternation);
- the consolidation of Open Fiber's presence as an active *employer of* talent in the **main Italian academic centres**, through a virtuous circle of **partnerships and career days** focused on excellence in engineering (TLC, electronic, civil and/or others);
- participation in employer branding events/activities, with a special focus on our presence in the **local territory**, enhancing the contribution of our professionals as *ambassadors of* company best practices, inviting them to target events (for example career days).

In terms of employer branding, in 2024 Open Fiber renewed two important awards for its people management and development policies: **Top Employers Italia** – awarded by the Top Employers Institute, a certifying body for excellence in HR best practices – and **Great Place To Work (GPTW)** – awarded by the international company of the same name that for forty years has specialised in the analysis of company environments, employer branding and employee engagement.

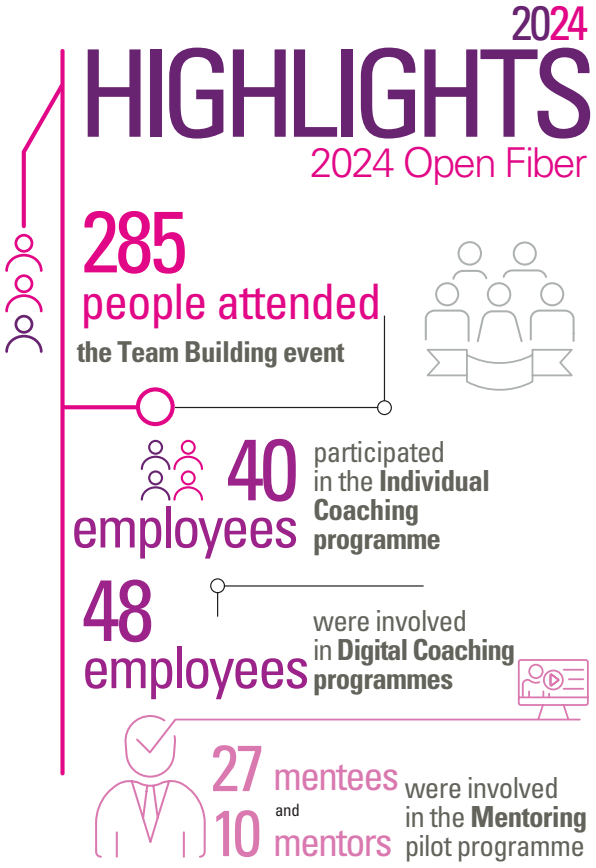
GROWTH AND TRAINING OF OUR EMPLOYEES

As far as training is concerned, Open Fiber, with the aim of structuring and enhancing its internal know-how, launched the **Faculty of the Open Fiber Academy** in 2023, a centre of excellence currently made up of 45 in-house teachers. The community's programme includes consolidation activities, sharing of experiences/skills and co-design meetings with the aim of building a **training offer that is always up to date and distinctive** of Open Fiber's core skills. Following the mapping of the skills of the Faculty teachers, the community co-designed **14 technical-specialist training courses** that were included in the OF Academy training catalogue and delivered to the relevant company personnel. Some of these programmes concern specific company roles and/or core processes, involving – where appropriate – external stakeholders such as partners and suppliers.



Making the most of a company's resources means defining clear and shared growth paths that are in line with the company's mission and values. With this in mind, in 2024 the **Behaviour & Performance Evaluation (BPE)** was completed, an employee performance evaluation and development process involving **over 1,200 people.** In 2024, Open Fiber also launched and implemented for the first time a **360° Evaluation** process aimed at all the organisation's managers, a development and self-development tool for behaviours related to the new skills model.

As part of Open Fiber's talent management policies, the company has also continued to design and strengthen various **Individual Development Assessment** and **Group Assessment** paths, differentiated by company population cluster with the aim of supporting the individual growth of resources and accelerating their individual development, facilitating internal development paths in relation to company needs and the evolution of the organisation, mapping target human resources to identify valuable resources. The '*assessment*' tool is also used to create a talent *pipeline* at various levels of seniority and to measure the level of involvement towards the Company, the role and the values of Open Fiber. **Over 70 employees** were involved in the year 2024.



WELFARE AND WELLBEING

The focus on people is one of the cornerstones of Open Fiber's vision. For this reason, the company is constantly committed to providing modern and flexible tools and **work models** that can meet specific personal needs and ensure an optimal level of **work-life balance**. This commitment is reflected both in the numerous welfare initiatives and in the agreements with employees and their

representatives on gender equality, remote working, risk prevention and safeguarding health in the workplace.

In particular, Open Fiber's welfare programme covers three macro-areas:

- **People Care**: initiatives aimed at promoting wellbeing;
- **Family Care**: initiatives that favour work-life integration;
- **Community Care**: projects aimed at promoting a culture of "social wellbeing"

Most welfare initiatives are communicated on the **Open Welfare** portal, a platform designed and implemented with the aim of **supporting a more sustainable work culture**, which allows all employees to benefit from a long list of services relating to education, health, family care (caregiving), babysitting, supplementary pensions, sport, culture, wellness, travel, transport, shopping vouchers and shopping.

Among the Welfare initiatives implemented in 2024 aimed at company resources, the following are valued:

- ***Bonus Neomamme*** (Mothers benefit), which provides a bonus of €1,000 in Welfare credit to all professionals returning from maternity leave in order to provide them with concrete help and facilitate their return to work;
- **Study agreements** with the main Italian universities and academic institutes to offer employees and their families favourable terms for training courses.

Always with a view to supporting *work-life integration*, Open Fiber believes that its **Smart Working** model, developed in 2023 together with the trade unions, has now become an integral and essential part of its corporate culture, offering the possibility of alternating office work with remote work for a total of **21 days every two months**.

This is precisely where Open Fiber's potential lies. While, in business terms, the Company is committed to creating the conditions to promote connectivity throughout the country, internally it tries to exploit its own network and technologies to support a very flexible approach and vision to work, with a project called **Fiber Working**.

Furthermore, in 2024, the **project DTTH 2.0** (**Dotazioni To The Home**), which involves the delivery of ergonomic and computer equipment to employees' homes, was re-launched for the fourth year in a row.

Open Fiber considers protecting the **health of** its personnel to be of fundamental importance. To this end, it provides its employees with **supplementary health insurance** that also includes their cohabiting partner or civilly united partner and their children.

In terms of healthcare, as in previous years, Open Fiber launched two **prevention campaigns** in October and November 2024, recognised respectively as men's and women's health month. It also promotes the **EAP** (Employee Assistance Program), a personalised programme of psychological, legal, fiscal and social assistance support, free of charge and anonymous, for all its employees and their families.

DIVERSITY, EQUITY & INCLUSION

Open Fiber recognises and values uniqueness as a precious resource that can foster complementarity between individuals, stimulating innovation and creating synergies that have a positive impact on the work environment, people's well-being and company performance.

Based on these assumptions, the Company has developed ***Unici nel Connettere*** (Unique in Connecting) which encompasses the programme of initiatives in the field of **Diversity, Equity & Inclusion (DE&I)** in favour of all Open Fiber people in line with

the Company's strategy and values, thus guiding the growth and evolution of the Organisation.

This attention meant that in 2024 the company confirmed, for the second consecutive time, the certification of the **management system for gender equality** according to UNI/PdR 125:2022.

In 2024, the **collaboration with Fondazione Libellula**, an association focused on promoting a culture against violence against women and gender discrimination, was also maintained.

Among the collaborations started there is also the one with "**Cervelli ribelli**", a non-profit foundation that has seen the inclusion of a neurodivergent person in an internship and "**Includere per Crescere**" in partnership with Elis, a programme of initiatives in the field of recruitment, training, welfare, DE&I to generate and promote the direct employment of disadvantaged individuals in the corporate world, but also indirectly, i.e. through the supply network.

HUMAN CAPITAL PROTECTION

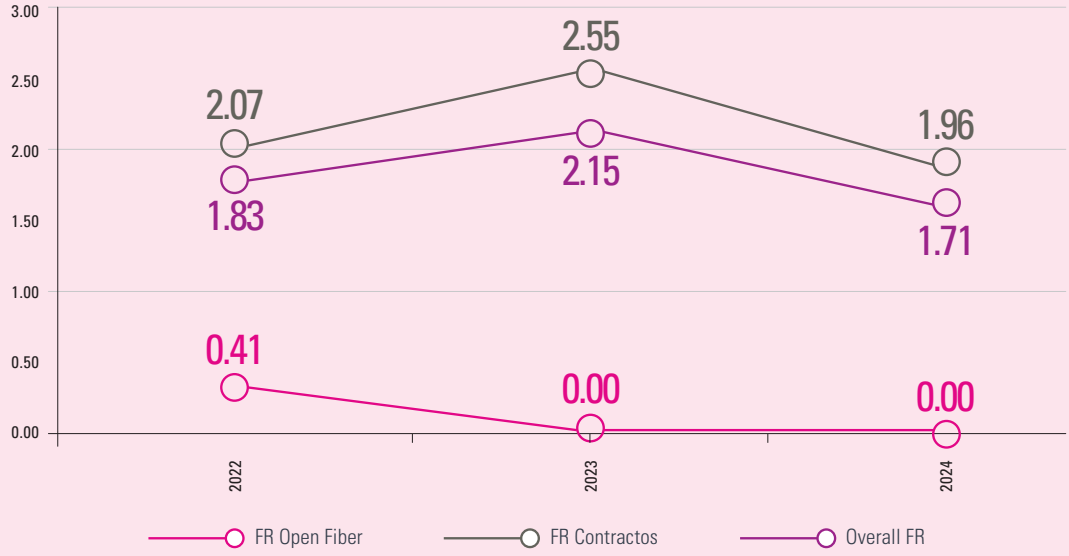
Another aspect of the organisation that Open Fiber cares about and takes meticulous care of is the health and safety of its employees. With this in mind, it strives every day to minimise risks, designing initiatives aimed at employees and all those who, in any capacity, work within the company offices, at the technological sites and within the scope of *Creation*, *Delivery* and *Assurance* activities.

In this context of protecting human capital, the **Management System** implemented by Open Fiber, certified for the Occupational Health and Safety component according to the **UNI ISO 45001** standard, is an important tool that allows for the constant improvement of company performance, always ensuring the highest standards of Health and Safety, as well as full compliance of the organisation with current legislation and agreements made with employees and their representatives.

During 2024, Open Fiber did not record any accidents among its employees (frequency index equal to 0). The accident performance of the companies involved in *Creation*, *Delivery* and *Assurance* activities, which also includes the Open Fiber Network Solutions Consortium, is improving (with low absolute values in terms of frequency and severity index).

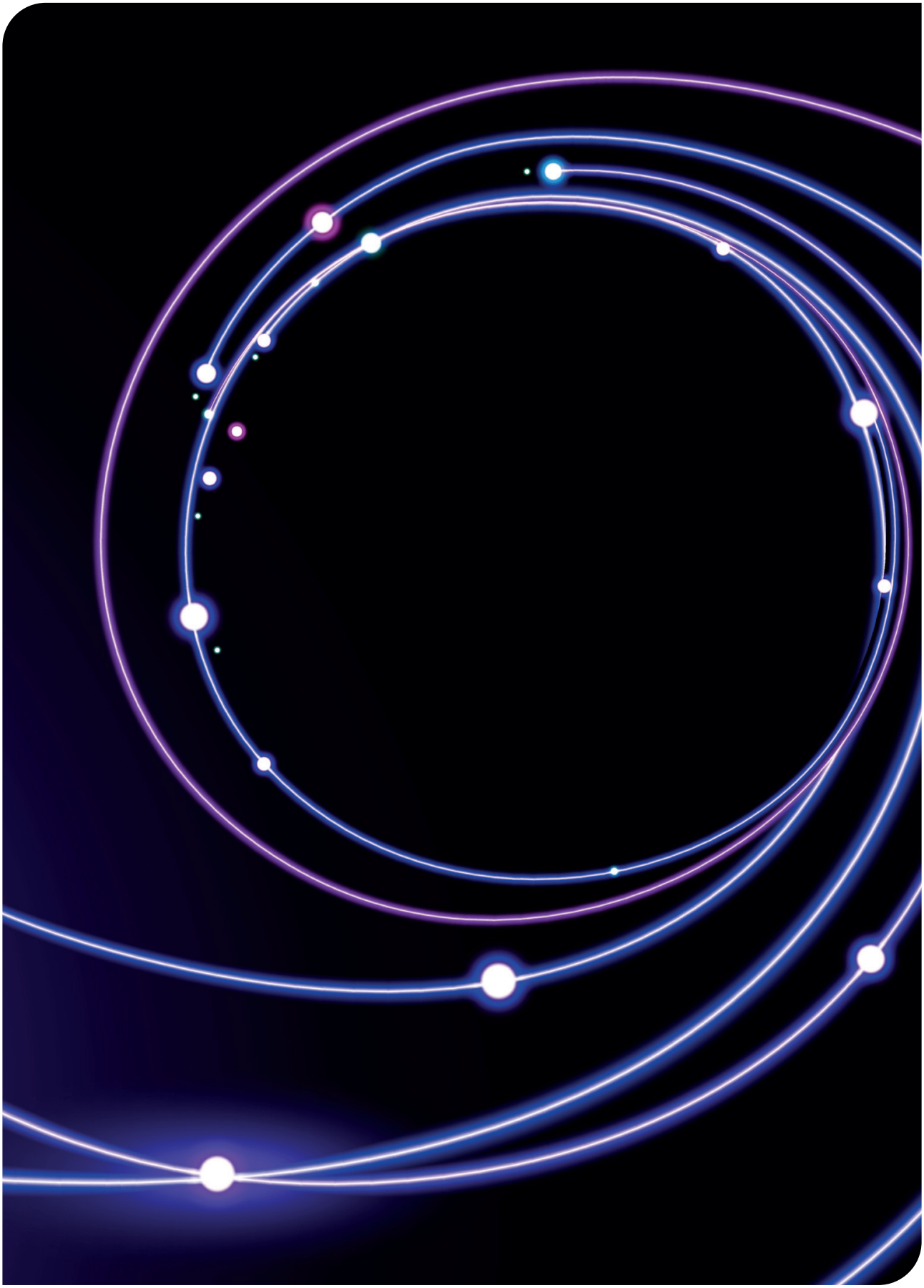
In an even more systematic way, in 2024, the Organisation monitored the episodes of 'near misses' that occurred during the conduct of activities, both for Open Fiber employees and for the

FIGURE 17: TREND OF WORK-RELATED INJURIES FREQUENCY RATES - OPEN FIBER

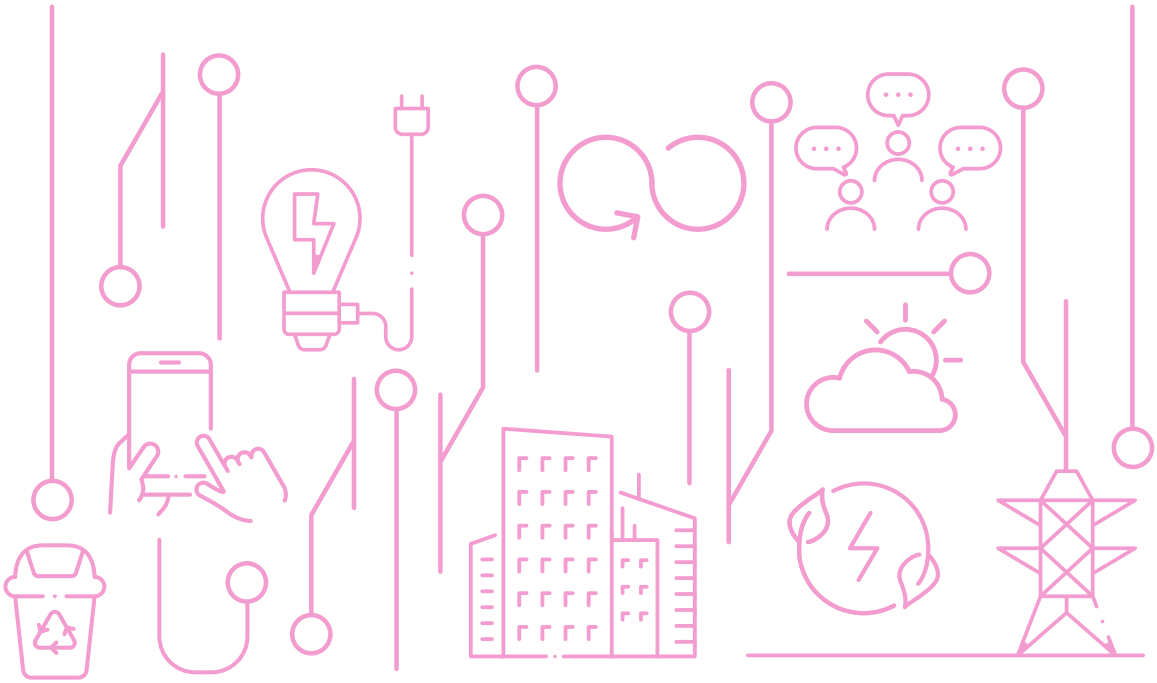


personnel of contractors in the *Creation*, *Delivery* and *Assurance* areas. With reference to the type of *near misses* reported, for Open Fiber personnel most of the reports refer to areas and facilities of company offices (about 67%), while for contractors, near misses were recorded mainly related to incorrect management of the construction site and signage (about 39%), failure to comply with safety procedures and measures (approximately 26%) and unsafe conditions (approximately 13%).

During 2024, Open Fiber continued and implemented a series of projects aimed at raising workers' awareness of the importance of health and safety, including the **C.A.R.E. Programme**, an initiative aimed at strengthening the HSE culture at all organisational levels, which is based on 4 drivers - Communication, Awareness, Responsibility, Engagement. In this context, **Best-in-Class 2.0** was created, a virtual contest integrated into the mobile APP for reporting "Best in Class Contractor & Employee" near misses, which involves the recipients solving a sequence of mini-games (levels) in the HSE field (e.g., proper use of PPE). The companies with the highest scores were awarded a prize.



Value for the community



IMPACTS ON THE **TERRITORY**

Given the explosion in the demand for internet access throughout Italy, Open Fiber's project represents an opportunity for the country, as it provides access to an ultra-broadband telecommunications infrastructure that increases the country's competitiveness in various areas, from home innovation to tourism, from **remote working** to **telemedicine**. The high browsing speed, a stable connection and very low latency that avoids delays in data transmission, create new opportunities, simplifying and improving relations between citizens and the Public Administration, between students, schools and universities, allowing the country to keep up with a world that is evolving by accelerating the digitalisation process.

In addition to the cabling of schools, the connection of hospitals and the digitisation of the Public Administration's management systems, the large-scale diffusion of the ultra-broadband fiber optic network represents a key element for the competitive, economic and social development of the country, determining the growth of the Gross Domestic Product (GDP). It has a positive effect on economic operators in terms of an increase in the number of jobs and plays a fundamental role in the revitalisation of small municipalities, in terms of new residents, who can offer a better quality of life.

AN INFRASTRUCTURE AT THE SERVICE OF:

SCHOOLS
By 2026, Open Fiber will connect over 45,000 schools with fiber optics, with the aim of digitising educational institutions and enabling the provision of services in line with new requirements. In 2024, around 23,000 schools throughout Italy were reached, with the aim of guaranteeing as many people as possible the right to study in the school of the future, which will be increasingly digital.

HEALTHCARE
By 2026, Open Fiber will connect over 12,000 healthcare facilities with fiber optics. In 2024, **2,856 healthcare facilities** throughout Italy were reached. The company is also involved in various projects aimed at monitoring patients in fragile situations and with chronic diseases.

PUBLIC ADMINISTRATIONS
Open Fiber, thanks to its infrastructure, enables the reduction of the gap between public bodies and citizens and bureaucratic delays, guaranteeing the enhancement of online services provided by Public Administration.

COMPANIES
In order to promote and spread culture and the digital transformation on a large scale, Open Fiber also meets the needs of businesses by providing a high-performance infrastructure capable of supporting innovative services and guaranteeing a rapid and efficient digitisation process, also for SMEs, which are the key element of the national economy. Furthermore, it should not be forgotten that the external workforce mobilised in the infrastructure construction activities in 2024 amounted to over 7,700 resources engaged in Creation, Delivery and Assurance activities.

In partnership with Nokia, Open Fiber has been the first wholesale-only operator in Europe and the first telecommunications operator in Italy to test record-breaking speeds of fiber optic connections, reaching up to 100 Gbps. The experiment is based on Open Fiber's current 10 Gbps fiber network and demonstrates how different PON technologies can coexist on the same infrastructure, increasing network capacity without the need for further structural interventions. During the tests, new applications were also evaluated, such as solutions for healthcare and industry, which require high speeds, reduced latency and reliable data transmission to connect to the cloud in real time.

WORKERS
Not only Smart Working: the new trend in work world is **digital nomadism**. "Digital nomads" are over 35 million all over the world[25] and they are increasing: this is increasingly widespread and, more and more, no longer just a desire, but also a personal need. It doesn't (only) mean young people with backpacks on their shoulders, but much more: it concerns an autonomous work mentality compared to the past, professionals who have their office anywhere and everywhere.

LOCAL TERRITORIES
Open Fiber also provides a concrete solution to connection problems that are common in small villages and mountainous areas. Thanks to the advanced infrastructure, it is possible to work flexibly, without interruptions and from any location. This not only improves people's quality of life, but also encourages the development of local businesses, allowing them to remain in their places of origin without the obligation to move to large cities.
Furthermore, implementing the *Piano Strategico Banda Ultra Larga* (or Piano BUL, Ultra Broadband Strategic Plan)[27] and *Piano Italia a 1 Giga*[28], by bridging the digital divide, contributes to reversing the depopulation and ageing trend in small municipalities and so-called "market failure areas".

WHITE AREAS 2024 RESULTS

6,615 small Municipalities being marketed

178 very white Municipalities[26] covered

25 Source: Ansa.

26 Areas where there is not even an ADSL connection.

27 The Ultra Broadband Strategic Plan aims to develop an Ultra Broadband network throughout Italy, with a particular focus on areas where the market is failing. Infratel's interventions are aimed exclusively at white areas of the national territory, in accordance with EU guidelines and in line with the results of the Public Consultation for Telecommunications Operators for Ultra Broadband on the National Territory.

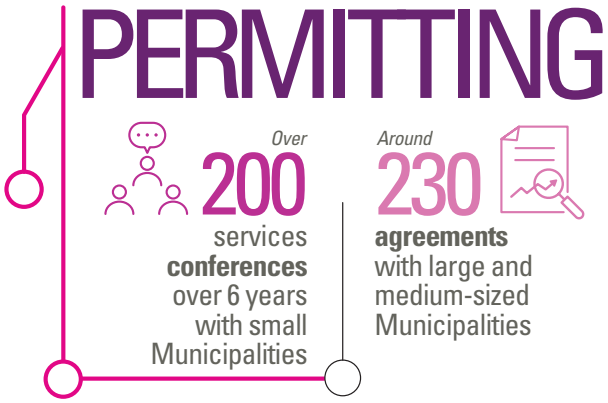
28 Italia a 1 Giga is a plan that aims to promote, through public intervention, investments in ultra-broadband networks that will guarantee all users a connection speed in line with the European objectives of the Gigabit Society and the Digital Compass. Italia a 1 Giga is the first of the public intervention plans of the Italian Strategy for ultra-broadband being implemented as part of the Piano Nazionale di Ripresa e Resilienza (PNRR, National Recovery and Resilience Plan), and provides for an allocation of approximately 3.8 billion euros.

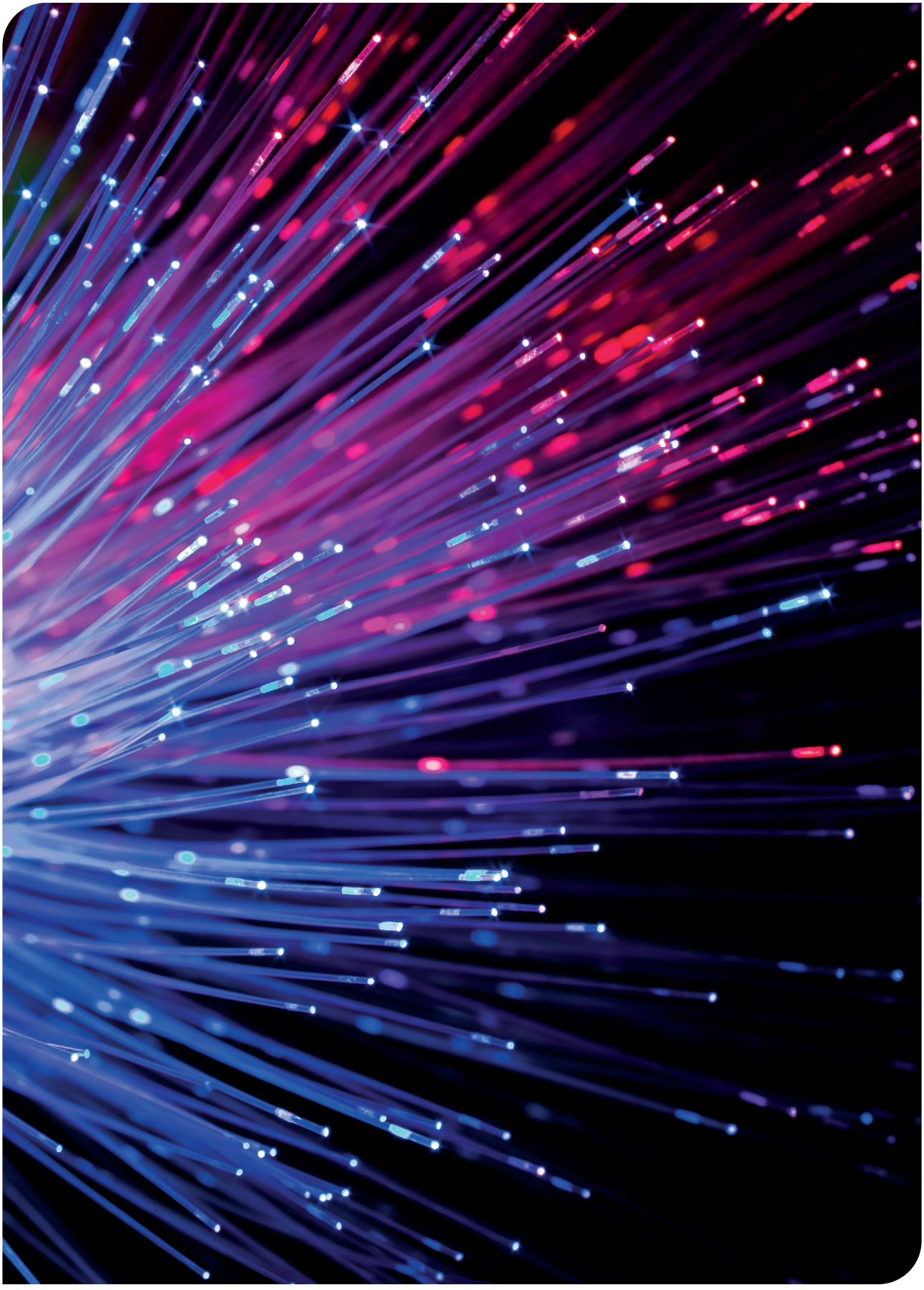
RELATIONS WITH LOCAL AUTHORITIES AND BODIES IN THE DOMAIN OF PERMITTING

Considering the number of municipalities in which Open Fiber operates, the volume of authorisations to be requested is very high (10 to 15 permits are needed to start laying the network). For this reason, the Company, through its *public relations* activities, is committed to raising awareness among the government, parliament and local authorities about the adoption of uniform national regulations to simplify and facilitate the issuing of authorisation opinions.

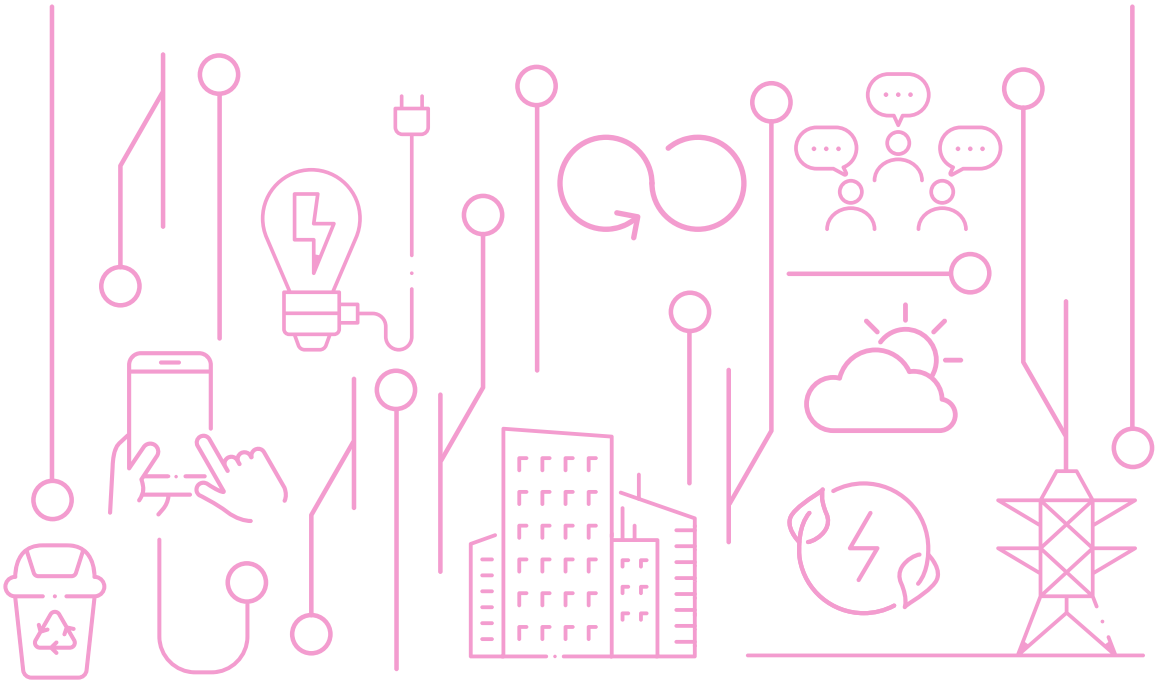
Over the years, this *advocacy work* has contributed to the introduction of simplification measures that guarantee a fixed timeframe for the conclusion of the administrative process relating to obtaining permits, which is now half the time it used to take.

In addition to the dedicated permitting procedures and channels, there are some cross-cutting activities that the Company carries out for all the areas of intervention in which it operates. Particularly important are Open Fiber's relationships with the superintendencies, based on dialogue and discussion, aimed at protecting the archaeological, monumental and landscape heritage, and with the companies that manage infrastructure and public utility services, aimed at sharing the opportunity to reuse an existing infrastructure for laying the fiber.





Innovation and development



INNOVATION

Building an ultra-fast infrastructure spread throughout the territory would be a pointless undertaking without a long-term vision. Open Fiber is aware of the speed at which technological progress advances, particularly in the field of telecommunications, and always takes into account the possible future challenges in this field. For this reason it has designed a future-proof network, characterised by its neutral, open, optimised architecture, which allows all Operators to provide their electronic communication services without any restrictions in the choice of their technologies and network architectures. One of Open Fiber's strengths is also its pursuit of innovation to create shared value in all aspects of the company's activities, thus achieving continuous improvement of its core services, especially in the constant search for new proposals and new connections between its services and other market sectors.

"NETWORK RESILIENCE" PROJECT

The increase in the number of customers and services offered by the Open Fiber network, as well as the ever-increasing demand for capacity from end users, has made it essential to launch a project called "Network Resilience" , whose main purpose is to provide an increasingly high-quality service to the OLOs (Other Licensed Operators) that access our network.

BACKBONE 2.0 PROJECT

In order to make the steady increase in traffic sustainable, Open Fiber has launched a project to develop its transport network, the so-called Backbone 2.0 project, aimed at creating a scalable infrastructure.

EDGE DATA CENTER

Thanks to the high number of technological sites scattered throughout the country, Open Fiber is an ideal candidate for the construction of a national network of Edge Data Centres [29], that offer distributed computing and storage capacity and provide Business and Residential customers with access to services and data.

OPEN FACTORY

Opened in 2019, it is Open Fiber's experimental laboratory where the most innovative technologies for the FTTH network and the FWA[30] wireless access network are tested. The experimental phase is fundamental because it allows, ultimately, to offer advanced connectivity solutions to operators (OLO) for both residential and business use.

INNOVATION LAB

In order to identify and shape new business models in line with the Company's experitse and mission, this widespread innovation laboratory was created to support and promote the adoption of Open Fiber services in competitive sectors such as Fintech and Industry 4.0, through the development of concrete cases and by addressing the market of Italian companies with high innovative potential.

SMART CITIES AND DIGITAL VILLAGES

Thanks to the polymer materials that fiber optic cables are made of and to the high transmission speed, the **FTTH connection** is the tool at the basis of the functioning of modern Smart Cities, thus confirming itself as the element that makes cities intelligent, functional and interconnected realities, equipped with services and infrastructures capable of interacting with human beings and their needs to the point of improving their existence.

Open Fiber, with its FTTH network, wants to make even the villages of the future smart, centres of tradition, culture and hospitality, able to offer services similar to those of Smart Cities thanks to digital and technologies. The ideal candidate to become the first **Digital Village** in Italy was Pitigliano, a small town located in a strategic position in the Tuscan Maremma, rich in history and surrounded by nature. The aim of the project is to promote the development of the village from a digital perspective to implement public utility services for the Municipality and citizens, thanks to the installation of FTTH (Fiber To The Home) optical fiber, carried out by Open Fiber as Concessionaire of Infratel Italia.

Such project should be repeated in other Italian municipalities with similar characteristics.

29 System of decentralised peripheral centres.

30 Fixed Wireless Access.

SMART GRID

Smart Grid projects represent a true technological leap forward in the management of electrical networks, improving the electricity distribution system and minimising network disruptions. This is all possible thanks to the possibility **of monitoring, implementing and automating remotely interventions** on individual electrical substations and the possibility of creating a **much more distributed production system**, consisting of multiple generation points, including medium and small scale. The **DSO 4.0** – Digital Network project involves the creation of a highly reliable and resilient communication system for the E-Distribuzione network, enabling the implementation of new features that significantly improve network performance.

FIBER SENSING

Exploiting the fiber optic networks already installed globally for TLC purposes (both in long-haul transport and urban access) could add significant value to the existing infrastructure. These networks can be integrated with reliable optical systems for geotechnical, environmental and civil infrastructure surveillance, offering advantages in urban and regional areas.

MEGLIO PROJECT

At the end of 2021, Open Fiber, in collaboration with BAIN, INGV (National Institute of Geophysics and Volcanology), INRIM (National Institute of Metrological Research) and Metallurgica Bresciana S.p.A., developed the **MEGLIO** Project (*Measuring Earthquakes signals Gathered with Laser Interferometry on Optic fibers*), an experimental project based on a ***fiber sensing*** system **for detecting earthquakes** on the national territory, thanks to the optical fiber that Open Fiber is implementing throughout Italy.

FAAS: FIBER AS A SENSING

Open Fiber financed and implemented the **FaaS (Fiber-as-a-Sensing)** project in collaboration with PoliTo (Politecnico di Torino), SM Optics and INGV (National Institute of Geophysics and Volcanology) with the aim of finding an alternative and/or integrative solution to that of the MEGLIO project, to improve and maximise the use of existing infrastructure to offer innovative and alternative services in the monitoring of seismic events, the network, infrastructures, etc.

RESTART PROGRAMME

In line with its commitment and contribution to the achievement of SDG 9 'Industry, Innovation and Infrastructure' and SDG 11 "Sustainable Cities and Communities", Open Fiber participates in the **RESTART Programme 'RESearch and innovation on future Telecommunications systems and networks, to make Italy more smART'**, funded by the PNRR[31]. The programme's second year saw the launch of the so-called 'RESTART Grand Challenges', i.e. round tables for discussion between the programme partners that favour the comparison between different realities, finally providing a list of the main research problems on the future of telecommunications, which the programme addresses from the point of view of new technologies and systems.

Open Fiber, actively participating in the RESTART programme, is a partner of the most important R&D programme ever developed in Italy in the telecommunications sector, which will trace the evolution of telecommunications on the national territory following the directives coming from European programming, which addresses the main

31 Mission 4, Component 2 "From Research to Business", Investment 1.3 "Partnerships extended to universities, research centres, companies for funding of basic research projects" financed by the European Union's NextGenerationEU, theme 14 "Telecommunications of the future".

R&D (Research and Development) issues defined in European programmes such as Horizon Europe[32] and Digital Europe[33].

The Company will participate in the programme with **six projects** aimed at developing new services, architecture solutions and strategic technologies:

Rigoletto[34]

Focused on secure communications through the use of quantum technology. Open Fiber will contribute to defining network architectures and applicable Quantum Key Distribution (QKD) scenarios in the telco network, and will participate in demo activities for QKD and fiber sensing technologies.

PESCO[35]

Focused on User-centric Pervasive Internet and edge computing architectures.

Net4Future[36]

Aimed at promoting a new regulatory framework encouraging innovation through the definition of new network architectures, the enhancement of technological solutions for the development of inclusive and sustainable infrastructures and the creation of advanced digital services (verticals).

Sensing Net

Designed to develop fiber sensing services for earthquake monitoring and to distribute diagnosis and supervision in urban and regional scenarios.

Graphics[37]

Aimed at developing an active switch, that is completely optical and that can be programmed remotely.

TeleSmeg[38]

Designed to offer solutions that improve energy efficiency.

5G COVERAGE ALONG TRANSPORT CORRIDORS - FRÉJUS

At the end of 2023, Open Fiber, together with its partners Cellnex Italia, Cellnex France, RFI (Italian Railway Network), Anas, INRIM(National Institute of Metrological Research) and Accenture, was awarded the tender "**5G coverage along Transport Corridors**"[39] within the framework of **Connecting Europe Facilities (CEF-2) 2021-2027**. This call for proposal funded the study project "*5G Fréjus Inception study for deployment of 5G in the Fréjus cross border section between Italy and France*" focused on the development of 5G coverage of Fréjus tunnel between Italy and France. Such study was the first financed in the European framework and that involved Open Fiber.

DIGITAL TWIN: REALCITY PLATFORM

Open Fiber introduced a new system for designing the fiber optic network thanks to **RealCity**, a software platform that allows you to explore a realistic three-dimensional model of the territory, as well as to perform measurements and surveys remotely. This innovative tool accelerates the design process, improving its efficiency and sustainability through the use of a **Digital Twin**. Always focused on finding cutting-edge solutions, **Open Fiber** is indeed one of the first companies in Italy to adopt this technology on a large scale, applying it to an extensive and diversified infrastructure.

32 European Union's framework programme of the European Union for research and innovation for the period 2021-2027.

33 European Union's funding programme centred on the introduction of digital technology to businesses, citizens and public administrations.

34 Spoke 1, S4: Green autonomic optical networks, systems and integrated devices.

35 Spoke 1, S8: Pervasive user-centric integrated Sensing and Communications.

36 Spoke 2, S14: Cross-project vision and results, Evolution of Networking technologies for a Future sustainable and inclusive society.

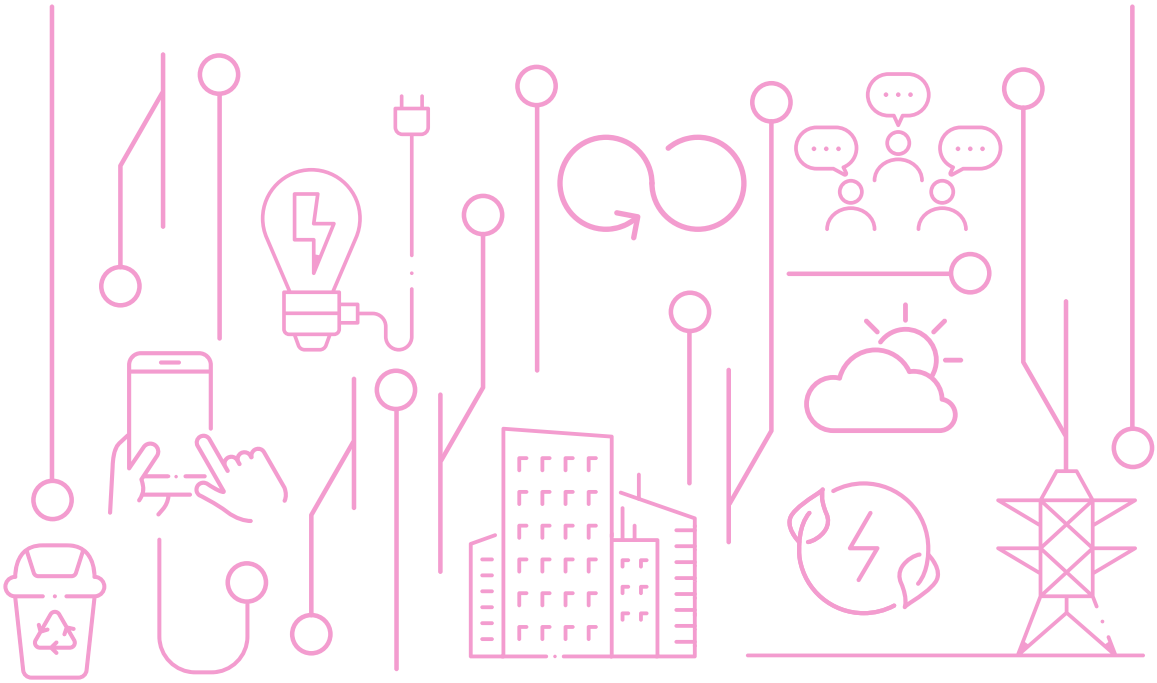
37 Spoke 1: F5: Graphene/a-Si:H Photonic Integrated Circuit Switch.

38 Spoke 5, F12: Telecom as a service in the next SMart Energy Grid.

39 CEF-DIG-2022-5GCORRIDORS.

Governance Systems

Sustainable Value Chain



GOVERNANCE AND BUSINESS CONDUCT

GOVERNANCE AND CORPORATE ORGANISATION

Open Fiber adopted an ordinary governance system and it is based on a Board of Directors[40], in charge of managing the Company, and a Board of Statutory Auditors entrusted with auditing the management. The Company is subject to the management and coordination of **Open Fiber Holdings S.p.A.**, a company **60% owned by CDP Equity S.p.A.**, a company of Cassa Depositi e Prestiti Group, and **40% by Fiber Networks Holdings S.c.a.r.l.**, a company belonging to the Macquarie Group.

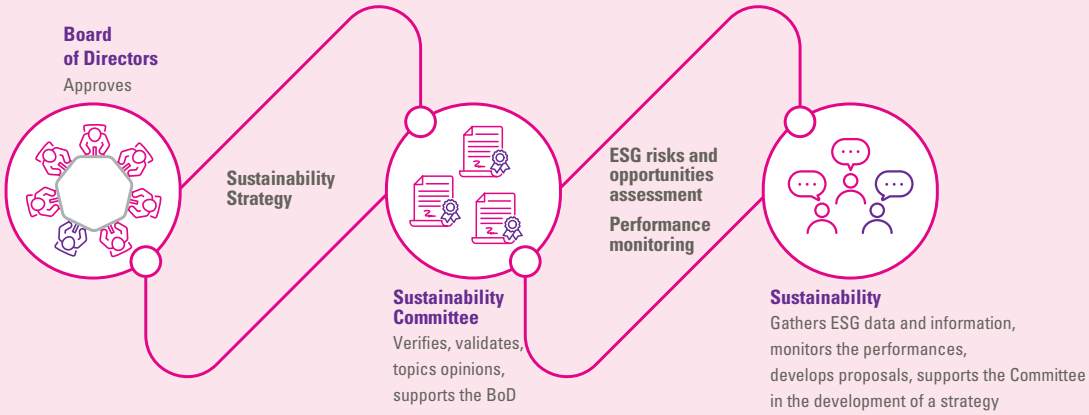
In addition to the Internal Committees ("Board of Directors' Committees"), Open Fiber set up other committees and working groups with responsibility for specific issues, including the Sustainability Committee.

40 The Board of Directors is made up of seven members, as decided by the Shareholders' Meeting. During 2024 Roberta Battaglia resigned from her position as director and was replaced by Manuela Carra. Furthermore, on 11/11/2024 the Open Fiber Shareholders' Meeting confirmed the current Board of Directors for the 2024-2026 financial years.

FIGURE 18: COMPOSITION OF THE BOARD OF DIRECTORS AS OF 31 DECEMBER 2024

The mission of the **Sustainability Committee** is to assist the Board of Directors in a proactive and advisory capacity in the assessment of ESG (Environmental, Social & Governance) risks and opportunities and in decisions relating to sustainability issues connected to Open Fiber's business, its activities of dialogue and stakeholder engagement and the Company's corporate governance, with the aim of generating shared value in the long term. The Committee is chaired by the CEO and is made up of permanent members (identified in the departments that manage material ESG issues and are responsible for actions aimed at improving the company's impact on these issues), members on call (identified in the departments that support the Committee in carrying out specific activities) and company Sustainability representatives[41].

FIGURE 19: SUSTAINABILITY-RELATED RESPONSIBILITY



41 With the organisational provision of 22/01/2024, the Security, QHSE & Sustainability department became part of the Risk Management & Financial Advisory Department.

ETHICAL BUSINESS CONDUCT

OPEN FIBER CODE OF ETHICS' PRINCIPLES

Code of ethics and OMM 231

The Company adopted a **Code of Ethics**, a reference document that summarises and codifies the fundamental values and principles on which the entire company's operations and organisation are based. The Code represents not only a set of guiding principles, but also a concrete commitment to all stakeholders involved in Open Fiber's business: employees, collaborators, business partners, institutions and citizens.

Furthermore, in line with Legislative Decree no. 231 of 8 June 2001, Open Fiber has introduced an **Organisation, Management and Control Model** (hereinafter Model or OMM 231), to protect the Company from administrative liability. This is a structured and organic internal regulatory system of procedures, policies, guidelines, operating instructions and control activities to be carried out also as a preventive measure, aimed at mitigating the risk of any kind of offence or crime occurring.

Risk control

Open Fiber adopted an **Enterprise Risk Management** (ERM) process – implemented by the Board of Directors and the Company Management Team – in order to analyse, evaluate and manage all risks that may have an impact on the Company's business at different levels. The ERM process supports the definition of business strategies, providing reasonable assurance that they will be achieved, and is designed to identify potential events that may affect the achievement of company objectives.

The strategic risk assessment process plays a fundamental role in connecting company objectives with daily operations. Through this approach it is possible not only to integrate the operational risks linked to the organisational structure, but also to respond proactively to market developments and new risk scenarios. In particular, increasing attention is being paid to sustainability-related risks, the so-called ESG (Environmental, Social & Governance) risks, which have the power to influence long-term business strategies and competitiveness.

Privacy protection

Compliance with privacy regulations is a priority for Open Fiber, which adopted a Data Privacy Governance model with the aim of protecting the data acquired, stored and processed within the scope

of its activities. In this way, the company guarantees compliance with data protection regulations, both for internal processing and that carried out by third parties (for example, suppliers), also defining strategies for controlling and monitoring compliance with the principles relating to information security and protection.

MANAGEMENT OF QUALITY, OCCUPATIONAL HEALTH & SAFETY AND ENVIRONMENT

Open Fiber prioritises the health and safety of its employees and of all those who, in whatever capacity and at whatever level, collaborate in pursuing the Company's objectives. The same care and attention is applied to the territory in which it operates, investing in technologies that respect the environment and offer advantages for its protection and spreading an infrastructure that, by its very nature, is highly performing and eco-sustainable. In line with this way of thinking, the company has developed a **Quality, Occupational Health and Safety and Environment Management System** (hereinafter QHSE), compliant with the international standards **UNI EN ISO 9001**, **UNI ISO 45001** and **UNI EN ISO 14001** and certified by an independent third party since 2020[42], whose aim is to guarantee that the commitments and objectives stated in the Policy for Quality, Occupational Health and Safety and Environmental Protection are met.

INFORMATION SECURITY AND BUSINESS CONTINUITY

Open Fiber started a process of constant updating and improvement of the Integrated Management System for Information Security and Operational Continuity. The commitment aims to consolidate Open Fiber's solid and mature position, ensuring the protection of customers, employees and collaborators, and all stakeholders. The Management System, modelled on the UNI EN ISO/IEC 27001 "Information Security Management Systems" and UNI EN ISO 22301 "Business Continuity Management Systems" standards, is set up to ensure constant progression and the achievement of the objectives stated in the specific company policies and the Code of Ethics. During 2024, Open Fiber maintained its **UNI EN ISO/IEC 27001 certification** and updated its **Business Continuity Plan** regarding the strategies and recovery actions to be implemented in the event of critical events that may cause the interruption of processes essential to the organisation, thus guaranteeing the continuous provision of services to its customers.

In addition, the commitment to **Information & Cyber Security training and awareness** activities continued, aimed at increasing the company's cybersecurity culture, involving staff in various initiatives aimed at recognising and managing threats and risks related to the cyber world.

SUPPLY CHAIN ACCOUNTABILITY

In its operations, Open Fiber focuses on quality, transparency and sustainability in procurement, guaranteeing efficient and responsible processes. For this reason, the Company has defined a transparent **Qualification Process** open to all interested companies and professionals, divided into:

- **A&B Cluster**: where Open Fiber intervenes to build the infrastructure with its own investments (cities and more urbanised areas);
- **C&D Cluster**: areas of market failure where Open Fiber is involved in the construction of the infrastructure, using funding provided by Infratel Italia S.p.A. The qualification process for C&D Cluster also applies to the construction of the

42 The certifications were confirmed during the 2024 certification renewal audit.

network infrastructure in the lots of *Piano Italia a 1 Giga*[43].

- In addition to productivity and economic reliability requirements for the operator, a series of quality criteria are also required (mandatory or preferential depending on the product category), such as:
- a traceability system for raw materials and products;
- a Quality Management System (*Sistema di Gestione per la Qualità , SGQ*) compliant with the current edition of the UNI EN ISO 9001 standard issued by an accredited certification body;
- an Environmental Management System (EMS) compliant and/or certified according to the UNI EN ISO 14001 standard;
- an Occupational Health and Safety Management System compliant and/or certified according to the UNI ISO 45001 standard;
- an Energy Management System (EMS) compliant and/or certified according to the UNI CEI EN ISO 50001 standard.

Also as part of the qualification process, Open Fiber uses business intelligence services to analyse reputational risk, ensuring that the counterparties in its supply chain respect the values and principles of the Code of Ethics and company policies.

Open Fiber also developed a **Vendor Rating** model that identifies the main evaluation elements, allowing each Economic Operator to be assigned a numerical value, called the Vendor Rating Index (IVR), which represents not only their technical-economic and production performance, but also their environmental and social performance.

The Vendor Rating Index applies to all qualified economic operators and/or members of the Access Mechanism who are the recipients of a contract for the execution of works, the provision of services and supplies, or who have a direct impact on the quality of services or who are considered critical for the achievement of their business objectives[44].

SUSTAINABLE PROCUREMENT

Open Fiber joined the **vendor rating platform ESG Open-es**[45] as **Value Chain Leader Partner** for the period 2024-2025.
Open-es is a digital platform supporting the sustainable development of all companies, from SMEs to large players, through which it is possible to measure their ESG performance, evaluate and share data and experiences, obtain personalised development plans and identify solutions to undertake a path of continuous and constant improvement over time. Furthermore, the Value Chain Leader Partner profile allows you to **evaluate the sustainability performance of your supply chain and support its optimisation and implementation** where necessary.
In 2024, the company published a **Sustainable Procurement Policy**, with the aim of formalising the company's commitment to adopting a **procurement model that integrates sustainability criteria** in order to maximise the positive environmental, social and economic impacts generated along the supply chain, as well as minimising the negative ones.

43 "Piano Italia a 1 Giga" is the first and most important among the "Ultra-broadband Strategy" projects financed by the PNRR funds. In fact, of the 6.7 billion euros of the PNRR allocated to ultra-broadband, 3.7 billion have been allocated to the "1 Giga Italy Plan". With reference to the qualification process for the activities included in the aforementioned Plan, design is excluded, for which reference is made to a Goods Group present in A&B.

44 The following product categories are excluded from the Vendor Rating system: Scouting supplies, Scouting work, Scouting services. The Vendor Rating system became fully operational in 2020.

45 Open-es is a digital platform launched by Eni, Boston Consulting Group (BCG) and Google Cloud, which supports the sustainable development of businesses. The platform allows all companies, from SMEs to large players, to measure their ESG performance, analyse and share data and experiences, obtain customised development plans and identify solutions to implement in order to improve.

Design and Layout

PRC PROMOTION RESEARCH CONSULTANCY