

# open fiber

## *Sustainability Policy*

This Policy was approved by the Chief Executive Officer  
of Open Fiber S.p.A. on 16/04/2025

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## ***1. Our mission***

Open Fiber was established to build ultra-broadband (BUL) FTTH (Fiber To The Home) fiber-optic network infrastructure in all Italian regions. To achieve our project, we chose the 'wholesale-only' business model in order to guarantee free access to all interested Operators, on equal terms, providing end-users with a wide choice.

Our mission pursues the goals of the European Digital Agenda, the Italian Ultra-Broadband Strategy and the Gigabit Society. A plan to establish minimum connectivity levels in all European countries for citizens, institutions and companies.

As an infrastructure player, Open Fiber is responsible for the construction, operation and maintenance of the fiber-optic network using FTTH technology, with very high levels of efficiency and reliability.

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

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

We create lasting shared value with all those with whom we interact every day, reconciling

business plan objectives with our environmental and social commitments, providing access to a fiber-optic network, actively contributing to the growth of the social and economic fabric of Italian cities and supporting citizens, businesses and public administrations in the indispensable process of technological growth.



### Reconceiving products and markets

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



### Redefining productivity in the value chain

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



### Enabling local cluster development

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

### 3. Our commitments

The Sustainability Policy translates the mission into 10 commitments that embrace the corporate values, the ethical and social principles enshrined in the Code of Ethics, the fundamental principles of the Global Compact and the Sustainable Development Goals (SDGs) of the United Nations 2030 Agenda, as well as the UN Guiding Principles on Business and Human Rights and the OECD<sup>1</sup> Guidelines for Multinational Enterprises for Responsible Business Conduct. The Policy also takes into account the impacts, risks and opportunities identified while conducting the organization's Double Materiality Analysis. In the specific policies on relevant issues and in the Sustainability Plan, the objectives and targets set by the Company are identified and monitored.

In order to comply with commitments set out in this Policy, we have implemented and maintain management systems that integrate and adopt the principles of the standards UNI EN ISO 9001, UNI EN ISO 45001, UNI EN ISO 14001, UNI EN ISO 50001, UNI CEI EN ISO/IEC 27001, UNI/PdR 125 and are inspired by the UNI EN ISO 26000 Guidelines. Stakeholder involvement and creation of a corporate culture on sustainability issues are central elements of our approach.

Finally, the commitments stated in this Policy also reflect the results of the Enterprise Risk Management (ERM) process, which, inspired by the COSO Framework, supports the organization towards a greater understanding and management of all risks, including ESG risks, so that they are integrated into strategies at all levels and the achievement of corporate objectives is facilitated.

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

At Open Fiber, we aim to build a future in which the new optical fiber technology can improve people's lives and represent an engine of change and economic, social and cultural development for the country, uniting Italy in the name of overcoming the digital divide. Among the main challenges, the development of the network in market failure areas and in industrial districts represents our commitment to implement Ultra Broadband networks, guaranteeing customers and end users a connection in line with European and national targets for digitalization.

We are committed to developing solutions that meet high standards of quality and security and are inclusive, recognizing the importance of building a relationship of trust with our stakeholders, ensuring that their needs and expectations are at the heart of our activities. We connect the country by working to wire many urban and suburban areas, without compromising

<sup>1</sup> Organisation for Economic Co-operation and Development.

territory and resources, to allow everyone access to services via a fiber that goes directly into homes without copper lines (FTTH – Fiber To The Home) to develop the network of the future, both with our own investments and with public funds. In this way, we actively contribute to the socio-economic development of the country, ensuring that everyone can make the most of our technological solutions.

## 2. We fight climate change

We recognize the urgency of taking action to address the consequences of climate change and global warming. For this reason, we orient our business towards reducing climate-changing impacts through concrete and measurable actions to reduce greenhouse gas emissions, promote energy efficiency and support the transition to a low-carbon economy.

We have embarked on a decarbonization path, defined by the Company's Net Zero Plan, which allows us to closely monitor emissions from our operations in order to take mitigation actions in line with the requirements of the Paris Agreement.

Through the definition of the Energy Plan, we are committed to achieve goals of energy efficiency, rationalization of consumption and, consequently, reduction of our carbon footprint, thanks also to the use of renewable energy.

At the same time, we are committed to consider the impacts of climate change on our operations by identifying, assessing, managing and reducing our exposure to climate risks within the framework of our Enterprise Risk Management (ERM) model.

## 3. We contribute to the transition to a circular economy

We recognize and promote our role as an enabler of a digital transition that is also environmentally friendly, contributing through optical fiber to the development of innovative and sustainable services with reduced energy consumption.

We implement practices that minimize waste and maximize the efficient use of resources, contributing to a more sustainable and responsible business model.

By sourcing materials with low environmental impact and promoting proper waste management, we ensure that our activities cause the least possible impact. We promote reuse, recycling and recovery practices and experiment with the use of innovative and sustainable materials.

We therefore want to activate a process of dynamic change, aimed at an increasingly conscious

use of natural resources, meeting the needs of our stakeholders and providing a network that contributes to the reduction of environmental impact.

#### **4. We protect the environment, the territory and biodiversity**

We invest in technologies that respect the environment with the aim of building and deploying an infrastructure that is, by its very nature, highly performing and environmentally sustainable. We favor the development of a fiber-optic network, where possible, on existing structures and we protect the integrity of places, with particular attention to areas of landscape and cultural interest. By using non-invasive laying techniques, we minimize the production of waste materials compared to traditional excavation technique.

We assess the environmental risks and impacts of our activities on a precautionary and 'life-cycle' perspective, working with partners and suppliers to improve practices to safeguard ecosystems and biodiversity, implementing all appropriate measures to prevent or minimize environmental impact on territory and community. We operate in compliance with national and local licensing regulations and in cooperation with the relevant local environmental authorities to prevent the deterioration of natural habitats, species and protected areas.

#### **5. We enhance our human capital and support fair and inclusive working practices**

We recognize and believe in the value of our employees and are committed to create a unique environment where everyone can express their skills and talent, keeping alive a sense of belonging, pride and motivation and ensuring professional growth paths according to a tailor-made approach. Through continuous training we want to increase skills and knowledge, also in order to enhance the uniqueness of each person.

We establish a real, constructive and transparent dialogue with workers and their representatives, in order to understand their needs, find the best solutions and guarantee fair working conditions.

We repudiate and condemn all forms of discrimination and promote, right from the selection phase, fairness and equal opportunities in all forms and with respect for ethnicity, nationality, age, gender, sexual orientation, religion, political opinion, marital status, parenthood, social and cultural origins.

The approach to sustainability and fair, inclusive and non-discriminatory working practices are

key criteria in our evaluation processes.

## 6. We promote occupational health and safety

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

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

## 7. We respect human rights

We promote and respect universally recognized human rights, adopt socially responsible conduct, condemn any violations and support best practices along the entire value chain, knowing that safeguarding human rights improves our performance.

We support the elimination of all forms of irregular, undeclared, discriminatory, forced, compulsory and child labor. The principles aimed at respecting human rights are regulated within the Code of Ethics and the Organisation and Management Model pursuant to Legislative Decree 231/01, as well as in contractual relations with employees, suppliers and Company partners, and are the subject of training for all Company personnel.

## 8. We believe in the values of ethics, integrity and free competition

We are committed to high standards of ethics and conduct, with the aim of promoting a responsible and inclusive corporate culture, communicating clearly and transparently with our stakeholders and providing accurate and timely information about our activities and performance.

Ethics and integrity are fundamental elements of our daily actions: we operate in compliance with current legislation and relevant international conventions, preventing and opposing any unethical behavior. We are committed to prevent corruption in all its forms, developing incisive, concrete and transparent practices in line with our Code of Ethics and our Organisation and Management Model pursuant to Legislative Decree 231/01.

We ensure a secure and reliable infrastructure over time, protecting fair competition, refraining from collusive, predatory behavior and abuse of dominant position. As an FTTH infrastructure provider, active only in the wholesale market (wholesale only), we offer access to the all-fiber network on fair and non-discriminatory terms to all interested parties.

### **9. We ensure information security and business continuity**

We put respect for the privacy of customers and end users first, in line with regulatory and non-regulatory requirements, ensuring responsible behavior with regard to the processing of personal data.

We work daily to avert cyber attacks that could jeopardize the continuity of our service and the reliability of the network by preparing a Business Continuity Plan and a solid information security management system, in order to respond promptly to any critical events and guarantee a high quality and reliable service for customers and end users.

### **10. We promote responsible value chain management**

We encourage and support sustainability best practices along the entire value chain, realizing that the performance of our value chain is intrinsically linked to our own and that their improvement reflects on the Company.

We promote our values, mission and vision among our partners and suppliers, as well as their adoption of appropriate environmental, social and governance standards.

We are committed to select and evaluate suppliers and business partners on the basis of specific social and environmental criteria such as occupational health and safety, fair contractual conditions and respect for human rights. With this in mind, we are committed to prevent, assess and mitigate any negative impacts related to our value chain, including by working with partners and suppliers to improve existing practices.

## ***4. Managing impacts, risks and opportunities***

We identify the environmental, social, governance and human rights impacts, risks and opportunities that Open Fiber generates. We conduct a materiality analysis aimed at identifying relevant issues in relation to the context in which we operate and the interests of our stakeholders.

This analysis, which is updated periodically, assesses not only the Company's impacts on the environment, economy and society (inside-out perspective), but also the financial effects that sustainability issues may generate on the business (outside-in perspective), in order to develop positive impacts and opportunities and to prevent and mitigate negative impacts and risks.

## ***5. Our Sustainability Strategy***

The commitments of the Sustainability Policy are combined with the evolution of the Company's business through the definition of the Company's Sustainability Strategy. The Sustainability Strategy identifies a series of pillars on which building its commitment in the medium and long term. The Sustainability Plan identifies the objectives associated with each pillar and the actions necessary to achieve them.

## ***6. Communication and dissemination of the Policy***

This Policy is shared with stakeholders with a view to transparency and collaboration and is also available to the public and anyone who requests it.

In carrying out Open Fiber's business activities, compliance with the principles and commitments expressed in this Policy is promoted.

The Sustainability Committee of Open Fiber S.p.A. is responsible for the implementation and monitoring of the Sustainability Policy.

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