SUSTAINABILITY REPORT

2025



open fiber

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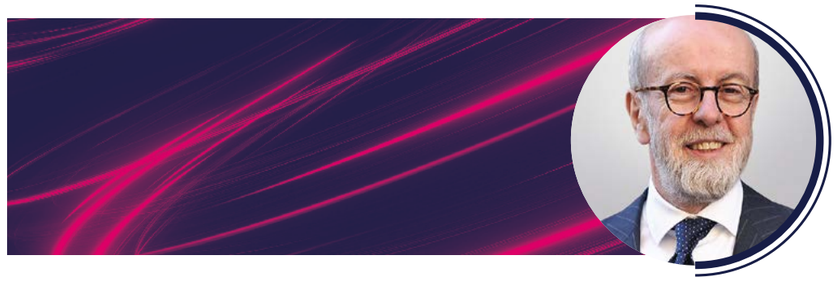
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LETTER TO **STAKEHOLDERS**





The fiber network is essential for the progress of the country and acts as an enabler of services for Italy's development. Today, we have built **the most extensive FTTH fiber optic network in Italy**, with **approximately 20.2 million households passed and more than 162,700 kilometers of infrastructure** distributed across the entire national territory. This project, supported by over 11 billion euros in investments,, has decisively contributed to the digital modernization of the country. In 2025 alone, infrastructure investments reached **1,588.2 million euros**. This journey has been made possible through collaboration with institutions and the contribution of public digitalization policies, including the **National Recovery and Resilience Plan (NRRP)**, which provided further momentum for the development of digital infrastructures and the acceleration of coverage in the country's underserved areas. Our infrastructure connects cities, industrial districts, villages, and inland areas, helping to bridge the digital divide within the country and making the national economic system more competitive. By the end of 2025, **5,962 municipalities in inland areas and 1,897 industrial districts** benefited from our digital network. The value of the network is also measured by its economic impact. Recent economic analyses demonstrate that **every euro invested in fiber in "White Areas" generates up to 4.4 euros of additional GDP**, confirming the role of digital infrastructures as an engine for economic growth and territorial cohesion. Very high-capacity connectivity enables more innovative production models, more efficient public services, and new opportunities for citizens and businesses. It allows broader access to digital services, telemedicine, education, and digital citizenship. For schools and students, it expands learning opportunities; for healthcare, it contributes to more effective care deliery; for citizens, it simplifies the interaction with the Public Administration, ensuring more efficient services, enhanced responsiveness, and better integration with communities. At the same time, it supports the growth of small towns, strengthens their attractiveness, and encourages safer and more sustainable smart city models. For businesses, it accelerates digitalization, increases efficiency, and makes smart working more effective, with environmental benefits as well. Furthermore, our FTTH infrastructure is an **enabling and neutral** platform from a sustainability perspective. Fiber optic networks are significantly less energy-intensive than traditional technologies (copper) and allow for an energy consumption reduction of over **86%**; in this regard, a switch-off would also bring significant benefits in terms of emissions. We have paired this technological sustainability with a structured environmental strategy, including a decarbonization plan aligned with the Paris Agreement goals and certified environmental and energy performance management systems. Our commitment has been recognized internationally with our inclusion in the **CDP Climate Change "A-List,"** which places Open Fiber among the top **4%** of companies globally for performance and transparency regarding climate change.

This transformation process, which benefits the entire country, is made possible by the commitment of the people working at Open Fiber. The company currently **engages approximately 13,000 professionals across the value chain**, through both direct and indirect employment, contributing to the development of technological and industrial skills fundamental to the country's growth. A high percentage of these professionals belong to the STEM sector. Our corporate culture is based on the **"Triple A" values – Ambition, Action, Accountability**. These three principles guide our decisions and represent the engine of our growth: the ambition to build strategic infrastructure for the country, the ability to transform visions into concrete results, and a sense of responsibility toward stakeholders and the communities in which we operate. A solid corporate culture, founded on ethics, transparency, and the creation of shared value, is the prerequisite for generating positive and lasting impacts over time. This approach is reflected in the quality of our work environment, recognized by important certifications, including the confirmation of Open Fiber as a **Great Place to Work for the sixth consecutive year**. Today, we enter a new phase of our journey. The infrastructure network is at a very advanced stage; it is now necessary for citizens, businesses, and public administrations to fully seize these opportunities.

In Italy, a paradox still exists: despite increasingly broader coverage that is very close to the European average, the fiber adoption rate stands at approximately **30%** (FTTH Council – Market Panorama Report – Take up Rate updated to September 2025), below adoption rates in the EU. Closing this gap is a strategic priority for the country's digital future and a great opportunity for Italy. With this **Sustainability Report**, now in its sixth edition, we aim to highlight the value generated by our infrastructure and the contribution we continue to offer to Italy's economic, social, and environmental growth. In summary, we are a large Group at the service of citizens, the industrial system, and the country, aiming to make a major contribution to technological evolution, cultural growth, and industrial development.

Enrico Tommaso Cucchiani
Chairman

Giuseppe Gola
Chief Executive Officer

HIGHLIGHTS 2025

20.2 million
Households Passed (FTTH and FWA)

Open Fiber
Main FTTH Operator
in Italy

162,700 km
of fiber optics infrastructure realised

Over **300** partner **operators**

Around **250** large and medium-sized **municipalities** being marketed

5,962 municipalities
with CUIR in white areas
and **1,897** marketable in industrial districts

For the 6th year consecutive:
Best in Media Communication
certification

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

Provision of training courses on
sustainability and **sustainable procurement**

Obtained
road safety
certification (ISO 39001)

Open-es
Value Chain
Leader Partner
in the Open-es alliance

Research and innovation through the
RESTART
program

Obtained certification for the
2024 GHG inventory
(ISO 14064)

Offsetting of 2024 SCOPE 1 and 2 emissions through the purchase of **carbon credits**

100% of the **electricity purchased**
by Open Fiber
from renewable sources

Maintenance of the **energy management system certification**
(ISO 50001)

Great Place To Work. Certified NOV 2025-NOV 2026 ITALIA
Great Place To Work
certification

Over **77,000** **training hours**
for Open Fiber and Open Fiber Network Solutions
including more than **21,000 HSE hours**

Maintenance of the
Gender Equality
certification (UNI/PdR 125)

+4.8% Open Fiber and Open Fiber Network Solutions employees

Around
34% women at Open Fiber

Climate CDP A List 2025
Inclusion in the
CDP Climate Change "A-list"

GOLD | Top 5% ecovadis Sustainability Rating OCT 2025
Obtained
EcoVadis
GOLD medal rating

WE SUPPORT UN GLOBAL COMPACT
UN Global Compact
membership

GRESB INFRASTRUCTURE ★★★★★ 2025
Obtained
GRESB rating
with 5-star
and a score of 99/100

ENABLING
SUSTAINABLE **FUTURE**

OPEN FIBER STRATEGY

Since its founding, Open Fiber has positioned itself at the forefront of profound change, aligning its daily operations with the creation of shared value for its stakeholders. This vision translates into concrete and responsible actions capable of looking beyond the present to respond effectively to environmental challenges and emerging social needs. The Company's ambition is to guide Italy towards a position of global technological leadership, supporting the economic, social, and cultural growth of the entire country.

By building a state-of-the-art, secure, and reliable infrastructure, Open Fiber acts as the engine to bridge the digital divide: a constant commitment aimed at making network access increasingly inclusive and widespread, ensuring that no one is excluded from the opportunities offered by digital transformation.

From large cities to the smallest communities, the Company pursues its **purpose**: to improve the quality of life for individuals, families, businesses, and workers, while ensuring environmental protection and the promotion of free competition. In this context, Open Fiber contributes concretely to the achievement of the **Sustainable Development Goals (SDGs)** defined by the United Nations in the 2030 Agenda.

Open Fiber's Sustainability Strategy, divided into the two areas of action – "essential" and "distinctive"[1] – identifies the pillars upon which the company's medium and long-term commitment is built[2], with the aim of creating value and integrating sustainability into the core business:

1. **Fighting climate change**: devising a long-term decarbonisation strategy starting from mapping the emissions of the value chain and defining a path for reducing direct and indirect emissions.
2. **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.
3. **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.
4. **Governance System**: increasing oversight in the management 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.
5. **Responsible communication**: maintaining an ongoing dialogue with stakeholder, 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.
6. **Sustainable value chain**: devising a sustainable value chain model, increasing the awareness of the players involved on ESG issues and involving the entire supply chain in the adoption of the highest standards of quality and environmental and social responsibility.
7. **Value at the local level**: 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.

1 Essential Sustainability – referring to the topics towards which private and public organisations are universally committing, regardless of their sector – and Distinctive Sustainability – referring to the topics that characterize not only organisations operating in the TLC sector, but which can differentiate Open Fiber's commitment to conducting a sustainable business.

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

FIGURE 1: SUSTAINABILITY STRATEGY PILLARS



8. **Circularity**: devising a resource management strategy to increase infrastructure sustainability, developing business models that respond to the challenges of the circular economy.
9. **Innovation and development**: continuously investing in research with the aim of providing constant technological innovation, establishing collaborations with leading companies in the sector, focusing on cutting-edge techniques and technologies and identifying solutions that guarantee a high-performance network infrastructure.

FROM THE STRATEGY TO THE SUSTAINABILITY PLAN

Building on the pillars of the Sustainability Strategy, Open Fiber has adopted the corporate **Sustainability Plan**. Validated by the Sustainability Committee and approved by the Board of Directors, the Plan covers the **same timeframe as the industrial plan**. For each strategic pillar, it identifies **21 ESG goals**[3] that outline the organisation's line of action. These

3 Eight goals associated with distinctive sustainability and 13 associated with essential sustainability.

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

Environment **Social** **Governance**

DISTINCTIVE SUSTAINABILITY — 23 ACTIONS

Pillar DS.1 — Sustainable value chain
- 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

goals are linked to **66 specific actions**[4], complete with **KPIs, qualitative and quantitative targets, timing, spending forecasts**, a clear allocation of **responsibility**, as well as the **direct and indirect impacts generated**.

The Sustainability Plan is subject to periodic review and updates to ensure its alignment with business dynamics. This ensures that sustainability goals evolve in perfect synergy with the guidelines of the Industrial Plan, responding effectively to new operational scenarios.

4 43 actions associated with distinctive sustainability goals and 23 associated with essential sustainability goals.

PARTICIPATION IN THE UNITED NATIONS GLOBAL COMPACT - UNGC

Since 2024, **Open Fiber** has been a member of the **United Nations Global Compact**, a voluntary initiative involving **over 20,000 companies** across more than 160 countries. This initiative invites corporations to align their strategies and operations with ten universally recognized principles regarding human rights, labour, environment, and anti-corruption, and to take action in support of the Sustainable Development Goals (SDGs).

RATING ESG - GRESB INFRASTRUCTURE ASSET ASSESSMENT

Since 2023, Open Fiber has participated in the international assessment developed by the independent organisation **GRESB**[5] with the aim of evaluating its performance and management processes in the ESG field. In 2025, Open Fiber achieved the maximum "**5-Star**" rating, with a score of 99/100, confirming its position **above the average score of its peer group** and the total participants.

RATING ESG – ECOVADIS

Since 2024, Open Fiber has participated in **EcoVadis**, an ESG vendor rating platform that evaluates corporate performance across four areas through an assessment: environment, ethics, labour practices and human rights, and sustainable procurement. In 2025, Open Fiber was awarded the **Gold Medal**, positioning itself within the top **5% of the highest-rated companies** across the evaluation categories.

RATING ESG – OPEN-ES

Since 2023, Open Fiber has participated in **Open-es** as a Value Chain Leader Partner, with the aim of promoting sustainability throughout its supply chain and assessing the level of integration of corporate values within it. Furthermore, in line with the spirit of collaboration and transparency promoted by the alliance, it measured its own sustainability performance, achieving a score of **87/100** in 2025, which was also validated by the certification body RINA.

RATING ESG – CDP

Since 2024, Open Fiber has participated in the **CDP Climate Change**[6] initiative, a questionnaire that allows companies to assess the risks, impacts, and opportunities related to their operations, supply chain, product and service offerings, and financial decisions, and to understand how these are connected to the issue of climate change. In 2025, Open Fiber achieved an **"A" rating**, the highest score in the CDP assessment – a milestone that demonstrates the company's real commitment to decarbonization.

5 Global Real Estate Sustainability Benchmark.

6 CDP (formerly Carbon Disclosure Project) is an international non-profit organisation that provides a system to measure, understand, and improve the environmental impact of investors, companies, and local authorities.

ESG CERTIFICATION

Since 2023, Open Fiber has been the first company in Italy to obtain the ESG (Environmental, Social, Governance) **certification**, a non-accredited standard developed by SGS – the world's leading company in inspection, verification, testing and certification services – aimed at assessing the management of ESG aspects within organisations. Confirming its **responsible management of sustainability issues**, in 2025 Open Fiber once again successfully passed the required third-party audits, thereby maintaining its ESG certification.

SGS APPROVED ESG Certification

SUSTAINABILITY POLICY

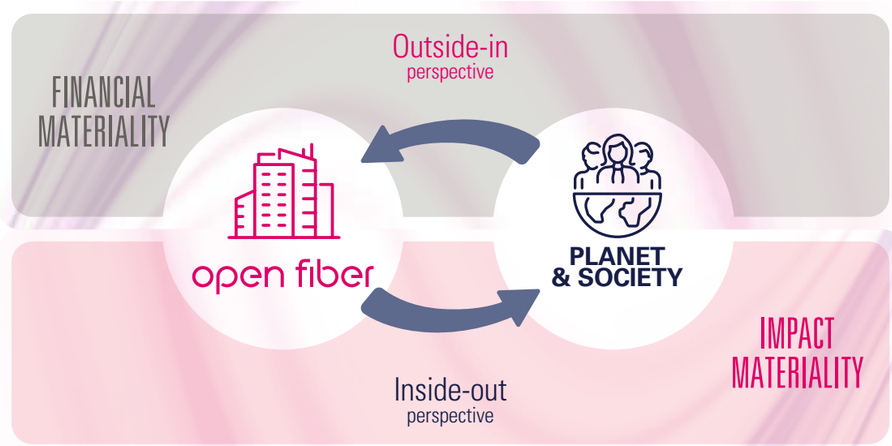
Open Fiber's Sustainability Policy, updated during 2025, translates the corporate mission into **ten commitments** that reflect the company's values, the ethical and social principles declared in the Code of Ethics, the fundamental principles of the UN Global Compact, and the Sustainable Development Goals (SDGs) of the United Nations 2030 Agenda.

1) **We are committed to connect the Country so as to overcome the digital divide**, contributing to a future where new fiber-optic technology improves people's quality of life and acts as a driver for change and economic, social, and cultural development for the Country.
2) **We fight climate change** by aligning the business towards the reduction of greenhouse gas emissions and energy efficiency, while assessing and mitigating the impacts of climate change on our operations.
3) **We contribute to the transition to a circular economy** recognising and promoting our role as enablers of an ecological transition and fostering circular practices.
4) **We protect the environment, the territory and biodiversity** by investing in environmentally friendly technologies, prioritising the reuse of existing infrastructure, and safeguarding the integrity of the areas where we operate.
5) **We enhance our human capital and support fair and inclusive working practices** committing to creating an environment where everyone can express their skills and talent, condemning any form of discrimination, and promoting equity and equal opportunities.
6) **We promote occupational health and safety** through the adoption of responsible behaviour by all those who collaborate in achieving corporate goals, committing to spreading and consolidating a robust health and safety culture.
7) **We respect human rights**, condemning any form of violation and promoting best practices throughout the entire value chain.
8) **We believe in the values of ethics, integrity and free competition** as fundamental elements of our daily actions, operating in compliance with current legislation and international conventions, and respecting free competition by offering access under fair and non-discriminatory conditions to all stakeholders.
9) **We ensure information security and business continuity**, protecting the privacy of customers and end-users, and preventing cyber-attacks through a robust information security management system.
10) **We promote responsible value chain management** by fostering our values, mission, and vision among partners and suppliers, and encouraging the adoption of sustainability best practices throughout the entire value chain.

THE EVOLUTION OF DOUBLE MATERIALITY

The Sustainability Report provides an integrated vision of the economic milestones and the effects generated by the company's operations on the territory, the environment, and communities. Since 2021, the choice to publish an annual Report on a voluntary basis reflects the desire to offer stakeholders comprehensive and transparent reporting. This information framework allows for the precise monitoring of impacts produced, confirming the company's commitment to responsible and shared growth.

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



Materiality Analysis enables the identification of relevant and priority topics for the Company and its stakeholders, which will then be subject to reporting. Since 2023, Open Fiber has adopted so-called **double materiality**, anticipating the requirements set forth by the Corporate Sustainability Reporting Directive (CSRD)[7] regarding sustainability reporting. This process includes not only an assessment of **Open Fiber's impacts** on ESG topics (impact materiality) but also integrates the **financial materiality** of risks and opportunities, as well as the interdependencies between impact and financial materiality. This implies evaluating both the Company's influence on the environment, economy, and society (**inside-out** perspective) and what is relevant or could generate risks and opportunities for the business (**outside-in** perspective).

The process involves a **representative sample of key stakeholders** through surveys and focus groups, highlighting Open Fiber's commitment to the continuous improvement of sustainability governance and performance reporting.

From the 2025 Double Materiality analysis, 9 key topics emerged:

- Consumers and end-users;
- Affected communities;
- Business conduct;
- Innovation and digitalisation;
- Privacy and cybersecurity;
- Own workforce;
- Climate change;
- Circular economy;
- Responsible value chain management.

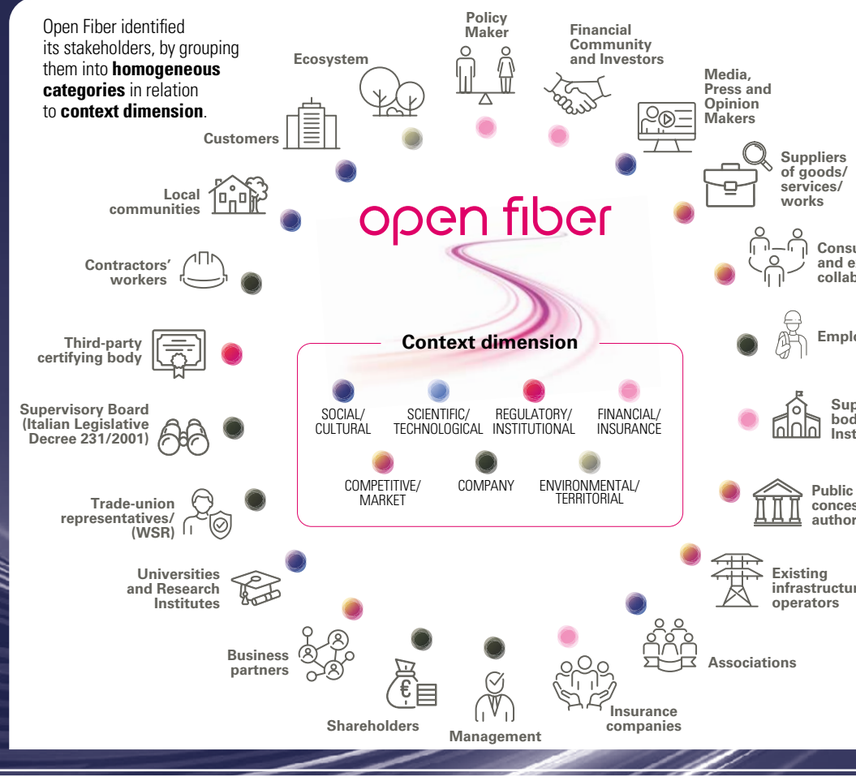
7 EU Directive 2022/2464.

STRENGTHENING THE STAKEHOLDER ENGAGEMENT STRATEGY

For Open Fiber, **continuous and participatory dialogue** with its stakeholders is an essential asset of the corporate strategy, enabling the collection of valuable feedback on initiatives undertaken and assessing their impact and alignment with expectations regarding environmental, social, and governance (ESG) issues.

Events, roundtables, regular and targeted listening sessions, and digital tools are all channels that Open Fiber utilizes to generate **two-way communication** with its stakeholders, as well as to ensure constant monitoring of their opinions and expectations[8].

FIGURE 4: STAKEHOLDERS MAP



8 For more details on the engagement channels, see paragraph 7.3 "Stakeholders' expectations and engagement channels".

STAKEHOLDER ENGAGEMENT POLICY

With the Stakeholder Engagement Policy, Open Fiber **formalizes a structured approach to dialogue and the involvement of its stakeholder**[9] through the following commitments:

- effectively, clearly and transparently present its **mission** and **values**;
- ensure **transparency** and the **sharing of** timely and accurate **information** with stakeholders, ensuring a clear understanding of objectives, policies adopted, actions taken and results achieved;
- guarantee stakeholders that their needs, concerns and expectations will be **listened to** and that they will be involved in defining company strategy, with particular reference to the **materiality analysis** process aimed at identifying the main economic, social and environmental issues affecting the Company;
- promoting the **involvement of stakeholders** as a useful tool for responding to the **social needs of the territories** in which it operates, thus maximising the value generated by the Company for the community, and for identifying potential opportunities, including through collaboration with the actors involved and open innovation;
- **anticipate possible critical issues** relating to policies, initiatives and projects that Open Fiber has developed, is developing or plans to implement, identifying potential risks;
- **promote the creation of lasting, stable and solid** relationships with stakeholders, also by raising awareness of the positive impacts generated by Open Fiber on ESG issues;
- ensure, also along the value chain, **compliance with applicable international laws and standards** as well as internal governance rules, with particular reference to unfair and information practices.

Since 2023, Open Fiber has launched a process to strengthen its sustainability stakeholder engagement strategy. The goal is to identify, for each stakeholder group, the **priority topics, methods, channels, and engagement tools**, as well as the **key messages** to be conveyed to its stakeholders to reinforce dialogue on ESG issues[10]. The process was developed following the **AA1000 Stakeholder Engagement Standard (2015)** guidelines, issued by AccountAbility[11] and involved the corporate organisation at all levels.

This journey has been followed by the **publication of the Stakeholder Engagement Policy** and the provision of **training and awareness programmes on sustainability topics**[12] aimed at the company's main key points (internal focal points).



9 Inspired by the AA1000 Stakeholder Engagement Standard guidelines.

10 Priority issues for each stakeholder were identified by listening to the engagement channels and using an artificial intelligence tool capable of detecting sustainability issues and classifying them according to the 17 Goals of the UN 2030 Agenda.

11 A world-leading organisation in the field of research, consultancy and standards that provides innovative solutions to the most critical challenges in the realms of corporate responsibility and sustainable development.

12 For more details on the sustainability training and awareness programmes, please see paragraph 3.2.3 "OF Academy: Internal Faculty".





01. COMPANY OVERVIEW

1.1 COMPANY PROFILE

The network that transforms Italy. This is the payoff of Open Fiber, a company controlled by Open Fiber Holdings – a firm owned 60% by CDP Equity (CDPE) and 40% by Macquarie Asset Management (MAM – and established through the merger of Enel Open Fiber and Metroweb. Since its foundation, the Company has been committed to build a **very high-speed fiber optic electronic communications network,** exceeding 1 Gigabit per second. This mission aims not only to bridge Italy's digital divide with the rest of Europe by ensuring coverage from **rural and industrial areas to major cities** but also to enable cutting-edge digital services for citizens, businesses, and the Public Administration.



1.1.1 MISSION, VISION AND DISTINCTIVE ELEMENTS

Open Fiber stands out for five key strengths:

- **protection of competition:** as a provider of ultra-broadband infrastructure with a wholesale-only business model, it offers network access on equal terms to all interested operators;
- **separation between network and services:** to protect competition and foster the liberalization process of the TLC sector, it maintains a clear separation between the provision of the network and the services related to it;
- **top performance:** transmission speeds of up to 40 Gbps (future-proof), the only technology capable of supporting the evolution of service offerings;
- **innovation development:** through innovative and inclusive technological solutions that favor economic growth, it establishes a policy of constant dialogue with institutions and local communities;
- **sustainability and environment:** with the intent of reducing environmental impact, it utilizes existing infrastructure wherever possible, respecting the territory – especially areas of landscape and cultural interest – by employing less invasive excavation techniques.

MISSION

Powering the Country's digital future with FTTH technology

Open Fiber was created with a clear mission: to reduce the digital divide and connect Italy through a **FTTH (Fibre To The Home)** optical fiber network, ensuring fair and cutting-edge digital access for private individuals, businesses, and public institutions. We are building the country's largest pure fiber infrastructure, based on a **wholesale only** business model that offers all Operators equal access conditions, fostering competition and expanding choice for end users.

VISION

An always-connected country

We believe that FTTH optical fiber represents a true step change for the country. Our goal is to improve the quality of life for people, from small villages to large cities, by offering **stable, fast and reliable connections**. Our network simplifies everyday life through technology – saving time and energy so people can focus on what truly matters: work, passions, and relationships.

1.1.2 OPEN FIBER JOURNEY

Open Fiber's daily commitment is directed towards the creation of an Ultra-Broadband **network** entirely in **fiber optics**, using Fiber To The Home (FTTH) and Fixed Wireless Access (FWA) technology. Distributed capillarily throughout the national territory, this infrastructure is designed to enable cutting-edge services and foster the revival of the Country System's competitiveness. Through a plan aimed at reaching 21 million households, the goal is to break down digital barriers, ensuring simplified access to the most modern innovative solutions for citizens, businesses, and the Public Administration.
To date, thanks to the wholesale-only model, **over 300 partner operators** – national and international, of very different sizes and types, including Large Operators, Business Telco Operators, Fixed Virtual Network Operators, TowerCos, International Operators, and Cloud Service Operators – have already entered into commercial agreements to use Open Fiber's network. The network employs **13,000 people**, **including internal and external resources**, contributing to Italy's economic and employment growth.
By the end of 2025, the Company had invested around **11 billion euros** and **made 18.4 million households (FTTH and FWA) available for sale** – including homes, businesses, and Public Administration offices[13]. This confirms its position as the **leading FTTH operator in Italy**, among the **leaders in Europe**, and the **top wholesale-only operator on the continent**.



13 Total of 20.2 million households connected as of December 31st, 2025, of which over 17 million households with FTTH technology and 3.2 million households connected with FWA technology.

1.1.3 ACTIVITY PLAN

The significant infrastructural operation underway positions the company as a leader in the national digital transformation, acting as an engine for the country's economic and social development. The creation of the fiber optic network, supported by direct investments and public resources, sees the Company committed to a capillary challenge that involves every area of the Italian territory, without geographical distinctions:

as a **pure, neutral, and non-vertically integrated infrastructure operator**, with no retail business units. This business model stands out for key characteristics that foster the growth of the digital economy:

- **neutrality and openness**, thanks to the implementation of an inclusive and competitive market where operators have equal rights of access to the network and, consequently, end users benefit from a wider plurality of services from their preferred provider at lower average costs;



The main urban centers where Open Fiber brings FTTH fiber optics directly into homes and offices through private investment. To date, the company is present in **250 medium and large-sized cities**, thanks to an investment of over 4 billion euros aimed at the construction and evolution of the network.



In these rural and peripheral areas, where operators did not declare an interest in intervening, Open Fiber was awarded three public tenders issued by Infratel[14] to build and manage, under a 20-year concession, an ultra-broadband network that will remain publicly owned. The operational commitment extends to **small municipalities** across all 20 Italian Regions, with the goal of reaching **over 9.1 million households**, including homes, businesses, and Public Administration offices. By the end of 2025, the plan saw the completion



Areas with a single network operator where it is unlikely that another network will be installed in the near future[15]. As part of the "Italia 1 Giga" Plan[16], the Government issued a series of Infratel tenders to ensure public support for the creation of an ultra-fast network in grey areas. Open Fiber was awarded **8 lots** of the public tenders: **3,881 Municipalities** across **9 Regions**[17]. By the end of 2025, the Company opened sales in **1,897 Municipalities**.

1.2 THE BUSINESS MODEL

1.2.1 WHOLESALE ONLY

Thanks to the **wholesale-only** business model[18], Open Fiber is fully focused on network development

- **long-term vision**, as the operator can focus exclusively on the expansion and continuous improvement of the services offered;
- **innovation**, because the absence of a legacy network allows for the use of the best

14 In-house company of the Ministry of Enterprises and Made in Italy.

15 European Commission definition.

16 Mission 1 "Digitalization, innovation, competitiveness, culture and tourism" of the National Recovery and Resilience Plan.

17 Campania, Emilia-Romagna, Friuli-Venezia Giulia, Lazio, Lombardy, Apulia, Sicily, Tuscany, Veneto.

18 The "wholesale-only" model has been regulated by the European Union through the European Electronic Communications Code.

2015 Enel S.p.A. established **Enel Open Fiber S.p.A.** with the purpose of building and managing an Ultra-Broadband fiber optic infrastructure (Fiber To The Home – FTTH) covering the entire Italian national territory.

2016 Following the negotiations between Enel S.p.A., Cdp Equity S.p.A., and F2i SGR for the integration of Open Fiber and Metroweb, Open Fiber's shareholding structure consisted of an equal partnership between **Enel S.p.A.** and **Cdp Equity S.p.A.** (CDPE).

2017 In January, the Board of Directors approved the merger by incorporation of Metroweb S.p.A. and Metroweb Genova S.p.A. into Open Fiber S.p.A. In the same year, the company was awarded the first **two Infratel Tenders**.

2018 Open Fiber was awarded the **FTTH Council Europe Operator Award 2018**, a prize recognizing it as the best European operator for its commitment to the development and deployment of all-fiber networks.
It also received the **TMT Infrastructure Loan of the Year 2018 – EMEA** for the most significant financing in the telecommunications sector (€3.5 billion).
In December, on the ZION backbone network, it set a new speed record, reaching 400 Gbps.

2019 In February, Open Fiber received the **Telecomms Deal of the Year 2018** award from PFI (Project Finance International) magazine for the most significant financing in the EMEA area for the construction of an Ultra-Broadband network.
In April, it won the third **Infratel tender**.
The **ZION** fiber backbone brilliantly passed the **600 Gbps** test, making Open Fiber's infrastructure the most advanced.

2020 Open Fiber's commitment to its people and operational standards was confirmed by the **Top Employer** and **Great Place to Work** certifications, as well as the attainment of **ISO 9001, 14001, and 45001** for Quality, Safety, and the Environment. The expansion of the project financing to €4.145 billion was signed, marking the most significant structured finance operation for fiber optic development ever carried out in Europe.
With **10.5 million households** cabled, the company became the leading wholesale operator on the continent. The plan contributed to 80% of the growth in Italian coverage, bringing the country to the top of European rankings.
The **ZION backbone** reached **800 Gigabits per second (Gbps) per optical channel.**

2021 Open Fiber published its first **Sustainability Report**.
In December 2021, the share purchase transaction was finalized with the entry of Fibre Networks Holdings S.a.r.l.
The new 2022-2031 business plan was approved, envisaging approximately 11 billion euros in investments to cover over 20 million **households**. This financing is the largest ever undertaken in EMEA for telecommunications network investments. Open Fiber reached a coverage of 13.5 million **households**, with a total of 3,449 Municipalities open for commercialization.

2022 Approximately **5,000 municipalities** were completed, corresponding to **15.5 million households**.
In March, Open Fiber established the Open Fiber Network Solutions consortium to pursue the country's digitalization goals, while in May, it was awarded 8 lots of the "Italia a 1 Giga" public tender (Mission 1 of the PNRR).
In June, the Corporate Sustainability Committee was established, a body with an advisory role on ESG issues.
New strategic partnerships were formed to accelerate the country's digital transformation (e.g., ESA, Euromilano, Svelto!, etc.).

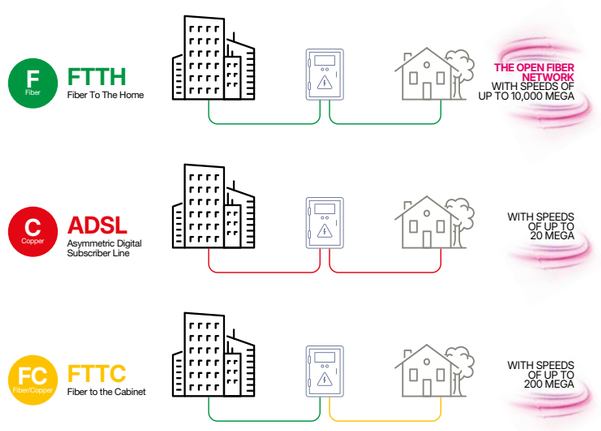
2023 Open Fiber has launched a **decarbonization** path with the certification of its GHG emissions inventory according to **ISO 14064-1** and the approval of its first **Net Zero Plan**, aiming to reach net-zero emissions by 2040.
Furthermore, it became the first company in Italy to achieve **ESG certification**, alongside recognitions for its **gender equality management system (UNI/PdR 125:2022)** and **energy management system (ISO 50001)**.
At the end of 2023, it secured its **first European funding** by winning the **Connecting Europe Facility** (CEF-2 Digital) 2021-2027 tender for the development of 5G coverage in the Fréjus tunnel between Italy and France.

2024 With approximately **18.7 million households** connected, Open Fiber confirms its position as the leading FTTH operator in Italy and receives the **FTTH Council Europe Operator Award**.
It approved its first **Sustainability Plan**, which integrates ESG commitment into the corporate business, joined the **UN Global Compact**, and became "Value Chain Leader Partner" of Open-es. As part of its decarbonization journey, it obtained validation of its targets from **SBTi**.
It stands as the first TLC operator in Italy to have tested a fiber optic connection speed of **100 Gbps**. The results of the MEGLIO project, which uses fiber optics as a sensor for seismic wave detection, were published by the **Nature** group.

2025 With infrastructure now nearing completion, the company is embarking on a new strategic phase focused on filling the network. Take-up levels remain low: to accelerate user migration to fibre, it is essential to have a clear timeline for the switch-off of copper, so as to facilitate an orderly and effective transition to all-fibre networks.
In December, with **20.2 million households connected** and **18.4 million households available for sale**, Open Fiber confirms its position as the leading FTTH operator in Italy, among the leaders in Europe, and the **first among the wholesale** operators on the continent.
In the **ESG** field, Open Fiber strengthens its position as a sustainable player by renewing important **international ratings**: noteworthy achievements include the **5-star** rating of GRESB and the inclusion in the **A-list** for CDP Climate Change.

FIBER TO THE HOME (FTTH)

Open Fiber's ultra-fast network is built in Fiber To The Home (FTTH) mode, literally "fiber to the home." The entire fiber optic stretch, from the exchange to the customer's home, guarantees maximum performance with speeds of up to 10 Gigabits per second (Gbps). It is a "future-proof" service, capable of supporting next-generation technologies. Unlike ADSL, which is copper-only, and FTTC, which is fiber/copper, the cables used in both stretches of the FTTH network are entirely made of fiber optics, offering significantly superior speed, stability, and latency. The FTTH network is the only one certified with the AGCOM green sticker as "true fiber".



technologies available on the market and the maximization of the network's operational performance, promoting digitalization and economic competitiveness.

The European Commission considers Ultra-Broadband fundamental to maximising the growth potential of the digital economy and has set connectivity targets to achieve the so-called Gigabit Society – an interconnected society. The FTTH network is the only one capable of guaranteeing a symmetrical speed of at least 1 Gbps, maximum bandwidth access up to the household, **symmetry** between upload and download, and minimum latency. These factors are crucial for the perceived connection speed and essential for increasingly widespread interactive applications, such as gaming, training, telepresence, e-health, and many others.

By the end of 2025, Open Fiber had achieved a significant milestone, providing most of Italy's FTTH accesses and accelerating the spread of fiber optics throughout the country, connecting millions of homes, businesses, public bodies and schools.

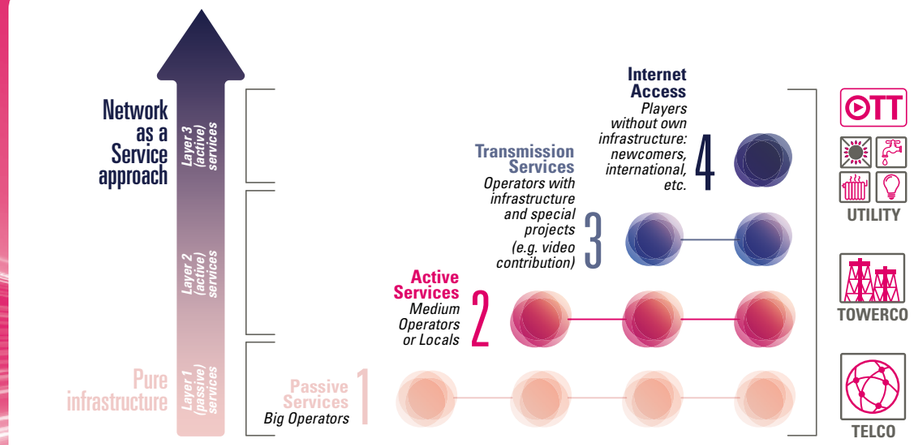
1.2.2 OPEN FIBER SERVICES

Open Fiber's high-quality, reliable, and flexible product offering includes **Pure Infrastructure** and **Network as a Service** solutions for both infrastructure-based operators and all players and newcomers without their own network infrastructure.

The services offered are divided into passive and active services. In **passive services**, the Company provides its fiber optic access network connecting the exchange – the infrastructure node hosting the fixed access and transport/backhauling network elements – to the associated end-customer premises, while the operator is responsible for PON (Passive Optic Network) or P2P (Point-to-Point) connectivity. The traffic generated by customers is collected and transported by Open Fiber's backbone network to an interconnection point at a Company exchange or an Internet Exchange Point, ensuring efficiency and reliability in data traffic management. This model is generally used by operators who independently manage the active part by installing their own network equipment within Open Fiber's exchanges through a Housing service, which provides the space and connection necessary to provide services to end customers.

Active Services, on the other hand, involve Open Fiber providing not only the fiber infrastructure but also connectivity using GPON

FIGURE 5: SERVICES OFFERED



PASSIVE SERVICES

Passive GPON FTTH: passive service using GPON (Gigabit Passive Optical Network) FTTH access technology with a point-to-multipoint architecture that allows for traffic multiplexing from multiple users on a single tree onto the same physical interface (GPON port). The service involves Open Fiber providing only the fiber optic access infrastructure.

Dark Fiber: provision of a passive Point-to-Point (P2P) connection through a dedicated fiber or fiber pair, available in both Basic mode (from an Open Fiber technological site to the Customer premises) and Premium mode (from the Customer premises to other Customer premises). Primarily used by major operators.

Housing: provision of rack space within the Open Fiber technological site where the operator installs its own transmission equipment. The service also includes the supply of electricity, air conditioning systems, equipment maintenance, cleaning, security services, and site surveillance.

ACTIVE SERVICES

Open Internet: a "turnkey" connectivity and direct Internet access service offered through PON FTTH access technology, with speeds of up to 10 Gbps in download and 2.5 Gbps in upload.

Open Stream FTTH: a point-to-multipoint FTTH connectivity service using PON access technology with speeds of up to 10 Gbps in downstream and 2.5 Gbps in upstream, including transport and delivery of operator traffic at an interconnection point within an Open Fiber exchange or an Internet Exchange Point.

GPON Business Access: a Layer 2 active service over shared fiber (point-to-multipoint FTTH connectivity using PON access technology) that allows for traffic multiplexing from multiple users on a single tree onto the same physical interface (GPON port). The service involves Open Fiber providing only the fiber optic access infrastructure.

Active P2P: provides Layer 2 connectivity up to 10 Giga between the Customer premises and the operator's interconnection point. It is used for connecting business premises, backhauling for operator nodes, as well as central and local Public Administration offices by utilizing fiber optic connections.

OTN: the termination equipment of the fiber optic access network at the Customer's premises. It is a device designed to convert the light signal coming from the fiber optic into electrical pulses manageable by any router or network access device.

(Gigabit Passive Optical Network)[19], XGS-PON[20] and P2P (Point-to-Point) access technology, with traffic delivery at an interconnection point or, in some cases, including direct Internet access. This type of service also includes the assignment of IP addresses to end customers, allowing the operator to guarantee connectivity without investing in infrastructure or network equipment. This is an all-inclusive service aimed at small operators and especially at multi-utilities intending to expand their offering on the national market with high-performance, high-quality fiber connectivity, facilitating the market entry of new service providers.

By the end of 2025, over 300 operators in the TLC (Fastweb, Tiscali, Vodafone, WindTre, EOLO, TIM, AT&T, Retelit, Iliad, Virgin Fibra, PostePay, Aruba), entertainment (Sky), energy, and e-learning (Enel, Sorgenia, Plenitude) sectors chose Open Fiber as their primary provider of infrastructure and network services. The Company's daily commitment is focused on defining a strategy that involves the design and constant expansion of its commercial offering. The goal is to accelerate the national digital transformation, intervening in a targeted manner to bridge the digital divide and ensure high performance in an increasing number of territories.

DATA TRAFFIC AND CLOUD ENVIRONMENTS

The expansion of digital consumption is leading to an exponential increase in data traffic. In this scenario, the use of Cloud solutions and remote environments becomes a priority, decoupling application usage from the physical location of IT infrastructures and ensuring smooth, ubiquitous service delivery.

A significant portion of this traffic occurs between Data Centers distributed across the territory (DCtoDC – Data Center to Data Center). To address this need, Open Fiber launched the **xPoP Backbone** as early as 2021; a digital highway connecting all the major Data Centers, Neutral Access Points, and international data traffic Cable Landing Stations in the country. It ensures maximum speed, enhanced security, and lower latency, utilizing the latest optical transport technologies available on the market for transmission of up to 800 Gbps on a single optical channel. Open Fiber's wholesale customers can thus benefit from diversified dedicated connections and offer their end users reliable services, ensuring optimal connectivity.

In parallel, Open Fiber's infrastructure has proven capable of supporting **Edge Cloud Computing**. In addition to already providing fiber connections for large Data Centers, it can host Edge Cloud Computing servers within its Edge Data Centers. This allows data processing to occur closer to end users, further reducing latency times.

1.2.3 CUSTOMERS AT THE CENTER

The corporate strategy places the Customer at the center of every initiative, promoting a path of constant service improvement. To guarantee standards of excellence, Open Fiber has systematically monitored **customer satisfaction** since 2021 through the Customer Satisfaction Survey. The questionnaire is characterized by the following distinctive aspects that ensure its consistency and reliability:

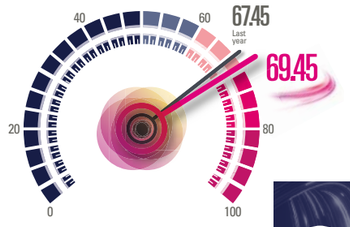
- **extensive nature**: it is not limited to an analysis of how a phenomenon is distributed within the sample, but explores the inferential link of the causal relationships that determine actions;
- **comparability and quality**: information is collected using standardized tools, procedures, and rules that allow for the comparison of data across different cases;
- **results in quantitative form**: through the statistical processing of data, it is possible to produce a series of inferences based on quantitative estimation.

The survey is focused on seven areas of investigation:

- **image:** reputation, innovation, responsiveness to customer needs, fair treatment of operators, the perception of Open Fiber as a sustainable Company, and its contribution to achieving partners' sustainability goals (for example, in reducing the carbon footprint of the services offered);
- **services and offering:** transparency of contractual documents, satisfaction with the portfolio of services offered, and the value of connectivity in terms of Customer loyalty;
- **commercial:** support and clarity during the commercial contract phase, ease of use of the ARO portal and the coverage database;
- **provisioning:** support and clarity in the service activation process and its progress status, ease of use of the operator portal;
- **assurance:** speed of intervention regarding reports or faults, clarity of the operator portal content;
- **coverage:** network capillarity in the territories of interest to the operator within the Clusters where Open Fiber operates, availability and clarity of the systems for verifying network coverage;
- **administration and finance:** invoice breakdown, clarity of the information contained therein, and the timing of receiving accounting documents.

In addition, in order to evaluate Open Fiber's performance, **qualitative aspects** cutting across the following areas of investigation were also analyzed: **reliability, responsiveness, communication, and sustainability**.

Since 2024, the Company's **Customer Satisfaction Survey** has further distinguished between Business and Residential services, analyzing their respective commercial, provisioning, and assurance dynamics. The questionnaire was administered to a sample of consumer and business service operators, selected based on their significance and representativeness in terms of connection volumes.



In 2025, in the fifth edition of the Survey, 171 representatives from 104 Customers responded; 73% of the operators to whom the survey was administered completed the questionnaire (of which 45% were from the residential segment, 18% from the business segment, and 37% from the residential & business segment). The results show that, for both the **areas of investigation** and the **qualitative aspects**, the scores are higher than in 2024, and the highest scores (above 74) were obtained in the **commercial** and **services & offering** areas of investigation.

The **Open Fiber Satisfaction Index** (i.e., the summary index of the responses given by all operators) confirms Open Fiber as a recognized brand and ideal provider in the Italian fiber connection market. A comparison with the 2024 results on the main indicators shows improvements across all areas of investigation and all qualitative dimensions.



1.3. TRANSPARENCY AND EQUAL ACCESS AT THE BASIS OF OPEN FIBER'S WORK

1.3.1 ANTITRUST ENFORCEMENT

In implementing the country's digitalization project, Open Fiber operates with full transparency and in synergy with institutions, suppliers, and partner operators. In full compliance with antitrust

19 Please refer to the website: https://openfiber.it/mondo-open-fiber/comunicati-stampa/

20 Please refer to the website: https://openfiber.it/mondo-open-fiber/comunicati-stampa/

regulations - which are an integral part of the corporate culture - Open Fiber has adopted an **Antitrust Code** that provides all members of corporate bodies and employees with a systematic reference framework for competition protection. To ensure these values, a dedicated oversight unit has been established, composed of members from the Legal Department and the Regulatory and European Affairs Department, with the task of monitoring full compliance of activities and preventing any conduct harmful to free competition.

The Antitrust Code identifies:

- practices, conducts, or behaviors that may violate competition;
- the areas and individuals who, by virtue of their responsibilities and functions, may be more exposed to such risks, in order to prevent them;
- the topics for discussion between personnel and the Antitrust Oversight Unit, which is tasked with providing the necessary support and assistance regarding the application of the Code.

To ensure compliance with the Antitrust Code – the violation of which could jeopardize Open Fiber's brand reputation and success, as well as lead to significant sanctions – the Company:

- ensures its dissemination and provides periodic training to all personnel;
- guarantees periodic review and updates aligned with the evolution of competition law;
- provides for disciplinary sanctions in the event of violations;
- adopts internal procedures to regulate the process of receiving, analyzing, and processing any violations;
- ensures the confidentiality of the identity and the professional protection of those reporting potential violations, in compliance with legal obligations.

In 2025, in continuity with the previous year, there were no pending or concluded legal actions against Open Fiber regarding anti-competitive behaviour or violations of Antitrust regulations.

1.3.2 TRANSPARENCY AND COMMUNICATION WITH CITIZENS, BUSINESSES AND THE PUBLIC ADMINISTRATION

As a wholesale operator, the company determinedly pursues the vision of a fully connected Italy, acting in synergy with the main players of the digital transformation. Along this path, an active involvement of local communities – from citizens to institutions and associations – is promoted, based on transparent communication. This dialogue does not only concern the progress of works and new available services but extends to the evaluation and sharing of the social, economic, and environmental impacts generated by activities within the territory.

For the **white areas**, where it operates as an Infratel concessionaire, and the **grey areas**, where it was awarded eight lots of the "Italia a 1 Giga" Plan, Open Fiber provides free access to the progress of works – in accordance with the information and transparency obligations signed as the winning bidder of public tenders – through its website, publishing documentation, interactive maps, and updates on the status of construction sites for each Municipality, for both FTTH and FWA technologies. Furthermore, Open Fiber also shares the results of the monitoring and impact assessments it carries out, both through dedicated meetings with institutions (for example, during conferences on innovation or digitalization) and during communication events aimed at citizens (such as press conferences and meetings with associations) which receive wide visibility on the Company's website[21] and the most relevant social channels.

In 2025, the company promoted and participated in **over 40 public events**, consolidating the dialogue with institutional stakeholders to disseminate its mission and the opportunities related to ultra-broadband. These initiatives ranged from press conferences for the start of construction sites and the activation of services in Municipalities, to forums dedicated to sustainability and institutional discussion tables on strategic projects, confirming a constant commitment to the transparent narration of the impact generated on the country.

On the occasion of the forty-second **National Assembly of Italian Municipalities (ANCI) 2025**, by virtue of its role as an enabler and promoter of the country's digital transformation, Open Fiber strengthened the dialogue with its stakeholders, raising their awareness of the advantages of

21 Please refer to the website: https://openfiber.it/mondo-open-fiber/comunicati-stampa/

DIGITAL COMMUNICATION

The **web**, and social media in particular, represent the channels through which Open Fiber creates a direct link with users' needs and expectations, interacting with them in a direct manner. In recent years, the Company has worked to grow its fanbase and interactions to make these dialogue channels with stakeholders increasingly active, boost activities, and generate follower interest in sustainability topics. The commitment to social communication made it possible to reach, by the end of 2025, **over 118,000** followers on **LinkedIn, over 89,000 on Facebook, 23,000** on **X**, and **over 11,000** on **Instagram**.

2025 also represented a significant year for the Company's **digital image**. Open Fiber launched the **"The Fiber Age" communication campaign** and a **completely renovated website**. These are two essential elements to mark the beginning of the new "100% fiber" era and raise user awareness regarding the importance of an entirely fiber-optic network.

The cornerstone of the "The Fiber Age" campaign was a commercial that retraces humanity's journey from prehistory to the present day. The narrative starts from the discovery of copper – used to create tools and the first network infrastructures – up to the dawn of a new era: fiber optics directly into **households**, the new standard for progress and connectivity.

In parallel with the campaign launch, the Company presented its new website, the result of an extensive visual and functional restyling project aimed at facilitating fluid and personalized navigation for different stakeholders and improving usability, especially regarding the most relevant content.



OPEN SUSTAINABILITY

In 2025, **"Open Sustainability"** continued – a monthly column launched in 2023 across corporate social channels (Facebook, X, LinkedIn, and Instagram) focused on the Company's commitments and results in sustainable development. Over time, the three pillars of sustainability – Social, Environmental, and Governance (**ESG**) – have been explored in depth. Open Sustainability has incorporated some of Open Fiber's key achievements, becoming the ideal vehicle to communicate the Company's commitment even to a younger target audience.



WEBSITE CONTENT ACCESSIBILITY

Although connectivity is now an essential element of daily life, 95% of websites in Italy still present access barriers for people with disabilities. With the aim of promoting authentic digital inclusion, a cutting-edge solution based on Artificial Intelligence and Accessibility Interfaces has been implemented on the institutional portal (openfiber.it) to ensure simplified and inclusive navigation, adapting to the specific needs of users with various disabilities[22].



Based on the compliance assessment against the "**Web Content Accessibility Guidelines 2.2**", Open Fiber's website was found to be 90% compliant with the **AA application level**.

BEST IN MEDIA COMMUNICATION

In 2025, for the **sixth consecutive year**, Open Fiber was awarded the **Best in Media Communication** certification by Fortune Italia and Eikon Strategic Consulting. This recognition is granted to companies that effectively communicate their mission, progress, and achievements through **impactful communication strategies and partnerships with leading entities** in their sector. All commercial sectors – including companies, institutions, and organizations – are evaluated using a methodology based on measurable criteria: corporate reputation in the media, the impact of the communication team's work, and the judgment of journalists and industry professionals.

technological infrastructure and the potential to activate innovative services[23].
The Company has established channels for managing information requests and complaints from stakeholders, committing to providing timely responses within very short timeframes, both through contact forms on the website and via active **social media channels**. Requests in 2025 were primarily informational in nature, followed by inquiries regarding coverage and service availability at specific street addresses. The majority of complaints, however, were related to inconveniences caused by construction works.

22 For example: epilepsy; visually impaired and blind users; ADHD; and cognitive disabilities.

23 For more details, see paragraph 4.3.2 "Relations with the local Authorities and Bodies in the Domain of Permitting".

1.4 OUR ULTRA-FAST NETWORK

Open Fiber's infrastructure, predominantly based on FTTH technology, ensures **fast, efficient, and reliable** data transmission. By overcoming the limitations of copper networks, fiber optics stands out for its flexibility and resilience, guaranteeing excellent performance regardless of weather conditions or physical distances.
The future-proof nature of the fiber optic network supports digital evolution and the growing demand for bandwidth without risks of obsolescence. These properties ensure high-speed connections and minimal latency times, in the order of milliseconds, making it the ideal asset for managing large data flows.

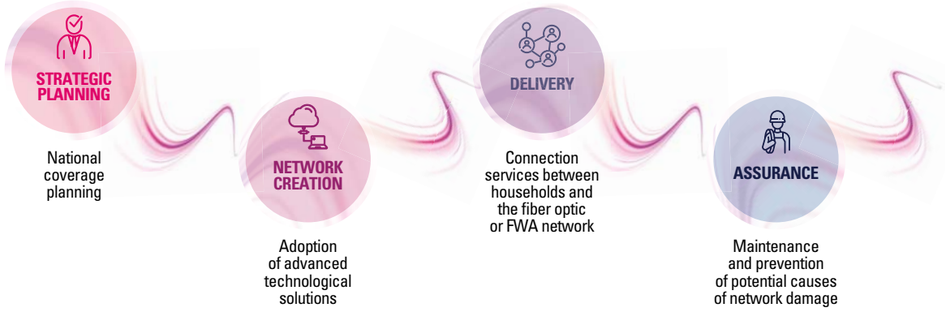
FIBER OPTICS: A LOW-IMPACT SOLUTION

One of the most significant features of fiber optics is its **low environmental impact**. The material it is composed of is generally synthesized from silica (silicon) and, unlike copper, does not require mining. The compact size of the cables allows for installation using techniques that minimize excavation volumes and atmospheric emissions. Furthermore, all network elements are "passive," meaning they do not require a continuous supply of electricity, thereby minimizing energy consumption.

1.4.1 THE INFRASTRUCTURE FEATURES

End-to-end process

Every stage of the operational process begins with the scrupulous selection of raw materials and



DIGITAL MONITORING IN THE NETWORK CONSTRUCTION PROCESS

Open Fiber supervises the progress of the work through integrated digital monitoring on network inventory systems. This process covers the entire life cycle of the project: from the pre-construction phase to construction, testing and As Built delivery. Partner companies are required to constantly update their information systems and ensure the complete traceability of every intervention to be carried out in a workmanlike manner. This documentation includes technical data sheets for materials, photographs of the construction and certifications for the correct disposal of waste, ensuring maximum operational transparency.

DELIVERY AND ASSURANCE

To ensure the best possible service for the Customer, Open Fiber operates on two fronts through Delivery and Assurance activities. The **Delivery** service handles connecting individual **households** to the fiber optic or FWA network and performing, where necessary and authorized by the Company, the essential operations to guarantee the connection of the Customer's unit and the activation of the requested services. The **Assurance** service is responsible for maintenance activities concerning the network and infrastructure, aimed at ensuring that technological services remain in a state of perfect efficiency, as well as the continuity and regularity of the services provided by Open Fiber, while preventing potential causes of damage.

contractors through an initial qualification[24] process, followed by the definition of stringent contractual requirements, specific Service Level Agreements (SLAs) for each type of intervention, and related penalties applicable in case of non-compliance. Open Fiber then implements a performance monitoring system through field inspections, audits, and periodic evaluations by assigning a **Vendor Rating Index**, which reflects technical-economic, production, environmental, and social performance.
To manage Delivery and Assurance activities, Open Fiber engages specialized companies through specific platforms by issuing Work Orders (WOs) and Trouble Tickets (TTs). The selected companies are composed of qualified personnel, comply with Occupational Health and Safety principles, and guarantee the availability of equipment, tools, hardware, and software necessary for the flawless execution of the designed works.
The quality of the service provided is also reflected in the adherence to precise codes of conduct by companies operating in direct contact with the customer. These include punctuality, speed, and professionalism in operations, as well as attention to cleanliness and order. Furthermore, it is essential to ensure availability and courtesy, act in compliance with the principles of fairness and confidentiality, and refuse any form of compensation from the customer for activities related to the installation.

Rigorous controls on materials

To ensure maximum reliability and network performance, all key materials and components of the fiber optic network are subject to rigorous technical specifications defined by Open Fiber (for **Clusters A&B**) or jointly with the Grantor Infratel Italia (for **Clusters C&D** and the **"Italia a 1 Giga" Plan** lots).
Supply chain partners are required to guarantee full compliance of materials with technical specifications, ensuring excellent quality standards. This suitability is validated by accredited third-party certification bodies through rigorous tests on samples randomly selected from production lots. The operating protocol also mandates full traceability of every raw material used, ensuring precise and transparent monitoring of the entire production process.
Open Fiber reserves the right to perform further checks, such as:

- **inspections** to verify compliance with contractual technical requirements regarding material supplies and the adequacy and correct application of the supplier's **Quality Management System** (in accordance with the **UNI EN ISO 9001** standard) and, where applicable, those of sub-suppliers;
- **testing**, **off-line tests**, and **conformity tests**, as well as all appropriate verifications on products and materials supplied, to confirm the reliability characteristics declared during the tender phase.

24 For details on qualification activities, see paragraph 6.5 "Supply chain accountability" and the dedicated section of the corporate website https://openfiber.it/en/suppliers/become-supplier/

Furthermore, in line with the goal of increasing the **circularity** of the infrastructure, the Company has introduced several innovations in the management of materials for network construction:

- use of **miniducts** for protecting fiber optic cables produced from polyethylene consisting of at least **70% recovered or recycled materials**;
- use of miniduct accessories made of **recycled HDPE** [25] riciclato;
- use of monoblock manholes in lightweight concrete;
- **reduction in the number of materials used** per single package and incentivizing the use of only eco-friendly and fully recyclable packaging materials.

Open Fiber is also planning a series of **PoCs (Proof of Concepts)** aimed at integrating two new types of optical fiber into its network:

- **Hollow Core Fiber (HCF):** the higher speed of light within the "hollow core" allows for a reduction in the number of signal amplifiers (regenerators) required for long-distance transmissions, significantly cutting energy consumption.
- **Multicore Optical Fiber:** multicore fiber is characterized by "n" cores for signal propagation within a single fiber. This technology multiplies transmission capacity, allowing for the use of fewer fibers compared to conventional ones, with a resulting decrease in the environmental impact related to production and transport.

These projects represent a significant step towards infrastructure optimization and the implementation of advanced technologies in the telecommunications sector, while simultaneously contributing to the reduction of environmental impact.

Network protection and monitoring

The development of the infrastructure requires cutting-edge technologies and highly specialized professionalism, guaranteed by the **Service Operation Center (SOC)**. Operating 24/7, 365 days a year, the center is dedicated to protecting network integrity and safeguarding the quality of the service provided. Thanks to this constant oversight, maximum promptness of intervention is ensured from the very first signs of an anomaly. The facility, equipped with over 100 workstations, performs continuous monitoring and intervenes in the event of faults, also thanks to optical reflectors installed at each user's home. Anomaly detection occurs through two identification modes:

- **Reactive:** reports from partner operators, followed by localization and intervention at the site of the fault;
- **Proactive:** anticipation of reports thanks to alarm systems triggered by Internet of Things (IoT) sensors embedded in the POPs (Points of Presence) and throughout the network path, enabling timely interventions.

1.4.2 CREATION PROCESS

The **process for creating** Open Fiber's ultra-broadband fiber optic network begins with the signing of an agreement with the relevant local administration[26]. This agreement defines the excavation methods for laying the fiber, work schedules, and technical and safety standards designed to minimize impacts on environmental, cultural, and landscape heritage, as well as disturbances to citizens during construction. Once all administrative permits and authorizations have been obtained, the activities required to bring fiber optics to the **households** are divided into six phases:

1. **exploratory phase:** collection of information useful for project definition such as, for example, the count of buildings to be cabled and the number of households and business units to be connected. Subsequently, the possibility of laying fiber using existing infrastructure or through *ex novo* works is evaluated. During this stage, known as Walk Out, communication and

25 High-Density Polyethylene.

26 For more details, see paragraph 3.3.2 "Relations with local authorities and entities in the permitting process".

authorization[27], forms are issued, some of which are addressed to local authorities, building managers (apartment complex administrators), or the owners of individual homes/businesses. Once the forms are collected, the internal census proceeds through on-site inspections of the buildings (a phase known as Walk In);

2. **design phase:** development of a "preliminary design" (*progetto di massima*) defining the works to be implemented, the laying technique (e.g., the type of excavation), the sizing of network elements, and the positioning of the PFS (Secondary Flexibility Point) street cabinet. In this phase, it is crucial to account for the PoPs (Points of Presence) – infrastructure nodes that house fixed access and transport/backhauling network elements, allowing for the aggregation and distribution of network traffic, whether in access or delivery. The goal is to identify the most efficient configuration and method for positioning and connecting them. Once approval is received, the design becomes an executive project, and authorization is requested from the competent offices;
3. **creation phase:** implementation of the FTTH connection system, in which PoPs are constructed and linked to households via fiber optics. PoPs can be established indoor (within existing buildings) or outdoor (through the construction of prefabricated structures called shelters and/or cabinets). This phase involves fiber laying works, the installation of street cabinets, and the PTE (*Punto di Terminazione Edificio* - Building Termination Point) or Advanced Termination Point to reach individual homes, offices, businesses, and Public Administration offices. During infrastructure deployment, Open Fiber prioritizes methods with the lowest environmental and social impact to minimize disturbances caused by construction sites[28]. Once the points of interest are connected, testing of the spans is carried out;
4. **restoration phase**: after the works are completed, the road surface is reconstructed, minimizing inconvenience to citizens and aiming to be as non-invasive as possible on the territory and the environment. These interventions are entirely funded by Open Fiber, with no costs incurred by the Municipal Administration. Restoration follows a clearly defined process:
   - a provisional one that follows the excavation works and remains for at least 30 days, necessary for soil settlement and characterized by a strip of cement mortar;
   - a second phase of final restoration after the technical timeframe for soil settlement, which consists of milling a portion of the roadway and resurfacing the street with asphalt;
5. **service activation phase:** to activate the line, the end user selects the commercial partner best suited to their needs among the entities that have signed agreements with the company for the provision of ultra-broadband. Once the subscription is signed, it is the responsibility of the latter to interface with Open Fiber to coordinate the final phase of installation and testing at the **household** or business premises;
6. **installation phase:** Open Fiber receives an "Activation Request" from an operator containing all the Customer's information, reserves the network resources, and contacts the Customer to schedule the intervention date and time. The intervention, which takes approximately 2-3 hours, takes place at the user's household. The procedure involves the installation of the optical termination outlet and the testing of the connection using test equipment, with the support of Open Fiber's SOC (Service Operations Center)[29].

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

28 For more details, see paragraph 2.3.2 "Non-invasive laying techniques".

DESIGN DIGITALISATION

In 2025, Open Fiber continued to adopt advanced digitalization solutions to optimize the design and implementation of the fiber optic network, focusing on two main drivers:

- **Digital Twin and 3D Territorial Mapping:** the adoption of the **Digital Twin** provides an accurate virtual replica of physical environments, allowing for the simulation and analysis of multiple design scenarios. Through the **RealCity** platform, Open Fiber generates detailed three-dimensional models of the areas to be cabled, ensuring millimeter-precision planning and a drastic reduction in errors. This technology optimizes collaboration between technical teams and local administrations, increasing operational efficiency. Thanks to RealCity, the Company confirms its position among the first entities in Italy to employ the Digital Twin on a large scale for telecommunications infrastructure.
- **Digitalization of Permitting and Reuse Procedures:** Open Fiber has enhanced the digitalization of authorization procedures and requests for existing IRU (Indefeasible Right of Use) infrastructure. Through an advanced system for the integrated management of authorizations for fiber optic infrastructure construction, the Company can monitor the status of each request in real time, optimizing communication between the departments involved and ensuring greater transparency and traceability in the permitting process.

By adopting these digital solutions, Open Fiber has significantly reduced permit issuance times and made network design more efficient and sustainable, accelerating the expansion of the fiber optic network across the entire national territory in line with the country's innovation and modernization goals.

1.5 ECONOMIC PERFORMANCE

1.5.1 MARKET CONTEXT

The instability of the global geopolitical scenario has influenced key macroeconomic indicators, leading to energy price hikes, inflation, and supply chain criticalities. These dynamics have had direct repercussions on the corporate value chain, particularly regarding increased costs in the petrochemical sector related to the procurement of bitumen for road restoration. Despite these external pressures, Open Fiber has been able to ensure the continuity of its industrial plan, maintaining the full operational capacity of its construction activities without recording significant slowdowns in the network construction and testing phases.

In 2025, its ninth year of operation, the Company continued its mission to build, manage, and market a "**future-proof**" infrastructure across all Italian Regions. By the end of the year, connectivity services on the Open Fiber network were available in **250 large and medium-sized cities**. In "white areas" under Infratel concession, ultra-fast connectivity on the public network built by Open Fiber was available in **around 6,000 small municipalities** at year-end. In "grey areas" falling within the 8 lots of the "Italia a 1 Giga" Plan, Open Fiber made services available in **1,897 municipalities within so-called industrial districts**.

Open Fiber's infrastructure is a **multi-operator passive network**, predominantly **FTTH**, supporting **GPON** (point-to-multipoint)[30] and **P2P** (point-to-point) connections with transmission speeds up to 10 Gbps, future-expandable beyond 40 Gbps with new standards.

29 For more details, see paragraph 1.4.1 "The infrastructure features"

30 Gigabit-capable Passive Optical Network. For more details, see paragraph 1.2.2 Open Fiber Services

DIGITAL DECADE RESULTS

According to the **State of the Digital Decade 2025** report, Italy has made progress in e-government, particularly in e-health and essential digital public services for businesses; it has continued to advance in the rollout of gigabit networks and maintains solid strategic skills for technological competitiveness, such as semiconductors and quantum computing. However, the country still needs to bridge gaps in digital skills and the adoption of advanced technologies by Italian companies, such as AI.

For these reasons, through the National Recovery and Resilience Plan (NRRP), Italy has accelerated the modernization of the Public Administration, supporting the technological transition of businesses and enhancing specialized skills throughout the territory. According to the Special Eurobarometer "Digital Decade2025" 73% of citizens recognize that the digitalization of public and private services simplifies daily life.

Another fundamental aspect is the participation in joint initiatives with other EU Member States. Italy participates in nine European Digital Infrastructure Consortia (EDIC) and in Important Projects of Common European Interest (IPCEI) on cloud services and microelectronics.

Since its market entry in 2017, according to official European Union and AGCOM[31] documents and reports produced by IDATE for the FTTH Council, the Company has helped Italy rise in the rankings for the digitalization of the economy. Furthermore, the latest **DESI**[32] index reports and the State of the Digital Decade Report[33], certify the country's progress in **VHCN (Very High Capacity Networks)** coverage, which increased from 22% in 2017 to 70.7% in 2024.

Regarding FTTH/B coverage[34] in Italy, the FTTH Council reports in the 2025 edition of the **"**FTTH/B Market Panorama**"** an increase in **FTTH/B households to 64.3%**. In rural areas – identified as zones with a population density of less than 150 inhabitants per km^2 – the report finds **62.5%** coverage in our country[35]. Although this does not perfectly match the "white area" classification established by the Ministry of Enterprises and Made in Italy, the FTTH Council data for Italy in 2015 stood at 0%. The results achieved in recent years clearly demonstrate the positive impact Open Fiber has had on coverage in these zones. However, the actual adoption of ultra-broadband connections by Italian users is still relatively low (27.6%) compared to recent progress in fiber rollout and remains below the EU average (53.1%).

FTTH FIBER OPTIC FIGURES IN WHITE AREAS

Consistent with the concession granted by Infratel, the project to adopt ultra-fast broadband for families, young people, and small businesses in white areas involves the construction of **over 91,000 km of network** (more than twice the Earth's circumference) and the issuance of **over 100,000 authorizations in 6,037 Municipalities**, to reach a total of approximately 6.27 million households and business units (apartments, offices, companies, and Public Administration offices).

As of December 31st, 2025, **over 90,000 km of network have been completed, representing 99.2%** of the total infrastructure development (construction, excavation, reuse, cable laying, etc.) planned.

1.5.2 OPEN FIBER PERFORMANCES

Open Fiber is working to bring innovation to the entire country and stimulate the long-term socio-economic growth of businesses, organizations, and the Public Administration. The multi-year plan envisages the coverage of **over 21 million households** and business units through the development and laying of a fiber optic infrastructure extending approximately 170,000 kilometers across the national territory.

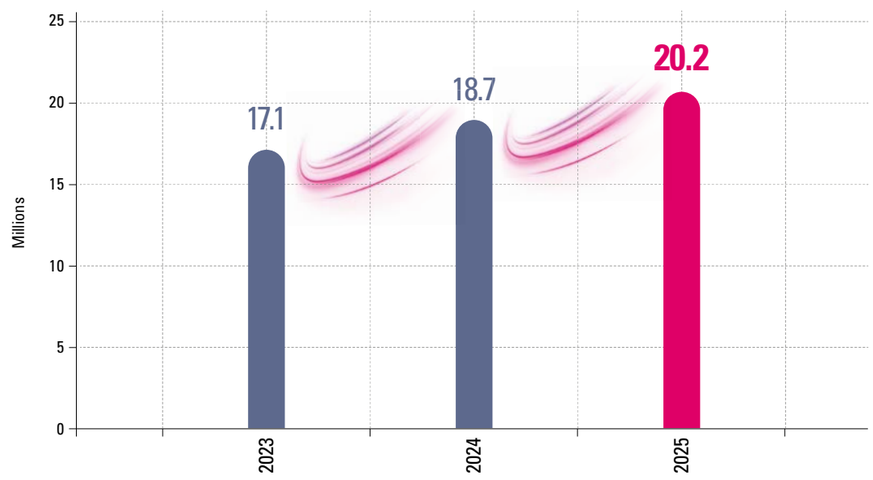
Despite the objective impediments to operations that have characterized recent years – from the health emergency linked to Covid-19 to the Russia-Ukraine conflict – Open Fiber has succeeded in advancing its network rollout plan and constantly guaranteeing its service, which has become even more fundamental for citizens, companies, and the Public Administration.

1.5.3 BUSINESS DEVELOPMENT AND NETWORK EXPANSION

During 2025, 1.5 million households were connected, reaching a total coverage of approximately **20.2 million households**[36], an **increase of 8%** compared to the previous year.

Infratel Italia's tenders mandate that, once works are completed, the finished households must be tested by the Grantor before they can be made available for sale. In addition to Infratel verifying the actual operation of the network and that the works were carried out according to the highest standards, this process includes the preparation of all documentation required for the technical

FIGURE 6: HOUSEHOLDS PASSED



31 Italian Communications Regulatory Authority.

32 Digital Economy and Society Index.

33 Since 2023, and in line with the strategic programme for the digital decade 2030, DESI has been integrated into the report on the state of the digital decade and used to monitor progress towards achieving the digital objectives. Data source: Report on the State of the Digital Decade 2025.

34 Fiber To The Home / Fiber To The Building.

35 Source: FTTH/B in Rural Areas 2024, FTTH Council Europe.

36 Of these, 3.2 million households passed were connected using FWA technology.

reporting of the works performed and any variations that occurred during the project.



1.5.4 INVESTMENTS

The Company's overall investments[37] which in 2025 amounted to **1,588.2 million euros**, primarily relate to the construction of the network and network infrastructure, the acquisition of rights of use (IRU[38]) on third-party infrastructure, the development of software and IT equipment, and improvements to third-party assets for both the network infrastructure and the Company's offices, as well as the construction of the network under concession.

1.5.5 THE GENERATED AND DISTRIBUTED ECONOMIC VALUE

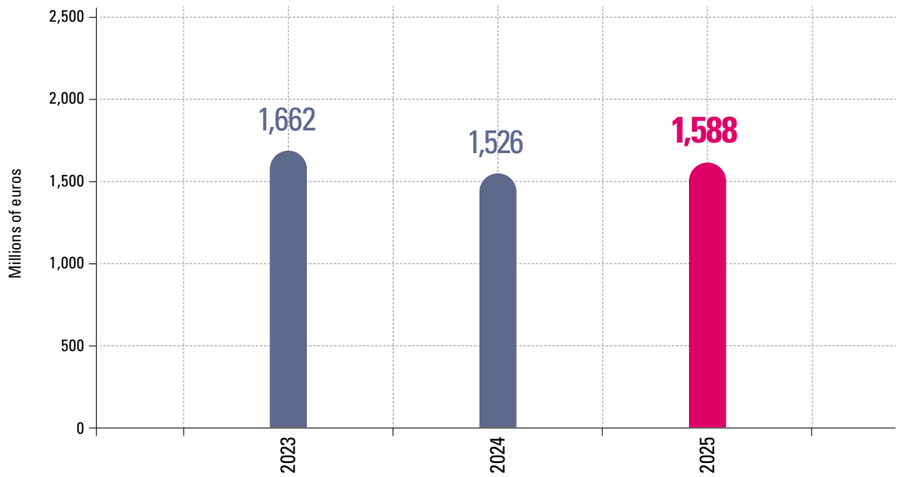
Open Fiber's commitment to sustainability translates into a strategy oriented towards the generation and distribution of value for the benefit of the entire reference ecosystem. The Company establishes itself as a solid and reliable partner, capable of building lasting partnerships and fueling the growth of the national entrepreneurial fabric. In this perspective, economic stability becomes the fundamental tool for creating value over time, ensuring positive and stable returns for all stakeholders involved.

In 2025, the **directly generated economic value**[39] amounted to 798.5 million euros (+18% compared to 2024), distributed as follows:

- operating costs, representing the value distributed to **suppliers**, equal to approximately 253 million euros (+3% compared to 2024), which includes service costs, costs for the use of third-party assets, and management charges;
- value distributed to **employees**, representing remuneration and benefits, equal to 99.3 million euros (-10% compared to 2024);
- value distributed to **capital providers**, which includes financial charges, equal to approximately 381.8 million euros (+21% compared to 2024);
- value distributed to the **Public Administration**, equal to approximately -92.9 million euros (for the 2025 financial year, this shows a negative value as the total income taxes were not effectively distributed to the Public Administration);
- value distributed to the **community**, equal to approximately 588 thousand euros (+30% compared to 2024), consisting primarily of charitable donations, liberalities, and association contributions.

The **economic value retained** by Open Fiber – the difference between generated and distributed value – includes the profit or loss for the year, depreciation, amortization, write-downs, and provisions.

FIGURE 7: OVERALL INVESTMENTS IN THE 2023-2025 PERIOD



PROJECT FINANCING IN SUPPORT OF THE BUSINESS PLAN

On February 14th, 2022, the Company signed a committed financing agreement with a pool of financial institutions for a total amount of up to **7,175 million** euros. During 2025, the Company signed an additional committed tranche, named the **Incremental Debt Facility (IDF)**, for a further **1,050 million** euros, intended to cover the financial requirements outlined in the latest approved Industrial Plan. The integration of the original financing with the aforementioned IDF brings the total amount available to 8,225 million euros, representing **the largest committed financing operation ever carried out in the EMEA** (Europe, Middle East, and Africa) **region to support telecommunications infrastructure investments**.

37 Total 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.

38 Indefeasible Right of Use.

39 The values reported refer to the consolidated financial statements of Open Fiber S.p.A. and Open Fiber Network Solutions.



TABLE 1: GENERATED AND DISTRIBUTED DIRECT ECONOMIC VALUE

GRI 201-1 GENERATED AND DISTRIBUTED DIRECT ECONOMIC VALUE

Description	U.M.	2023	2024	2025
GENERATED ECONOMIC VALUE	**€/000**	**582,295**	**679,370**	**798,515**
Production value (total revenues)	€/000	581,501	674,798	798,058
Other financial income (financial income)	€/000	794	4,572	457
DISTRIBUTED ECONOMIC VALUE	**€/000**	**531,804**	**610,323**	**641,732**
Operational costs	€/000	219,440	246,656	252,990
Value distributed to the employees	€/000	102,016	110,017	99,282
Value distributed to capital providers	€/000	264,581	314,686	381,809
Value distributed to the Public Administration	€/000	(54,638)	(61,488)	(92,937)
Value distributed to the shareholders	€/000	-	-	-
Value distributed to the community	€/000	405	451	588
RETAINED ECONOMIC VALUE	**€/000**	**50,491**	**69,047**	**156,783**

FIGURE 8: TREND OF THE VALUE GENERATED, DISTRIBUTED AND RETAINED IN THE 2023-2025 PERIOD

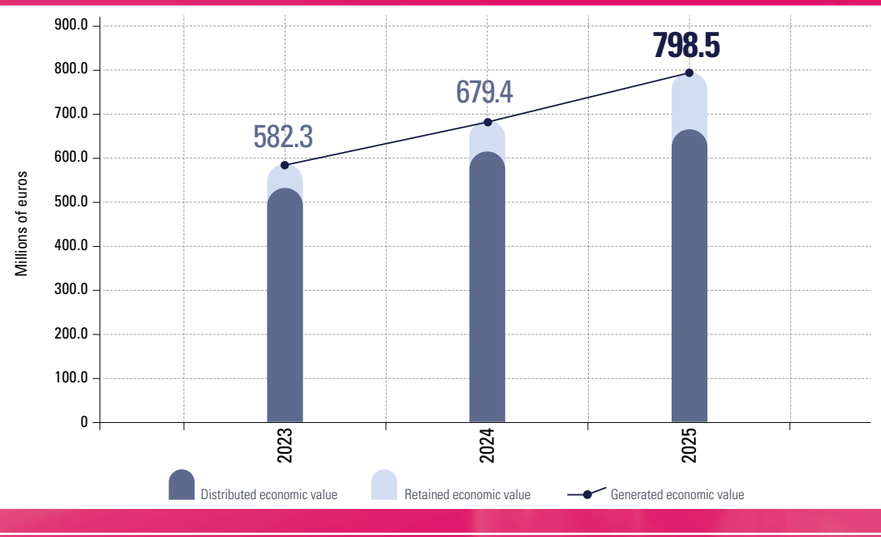
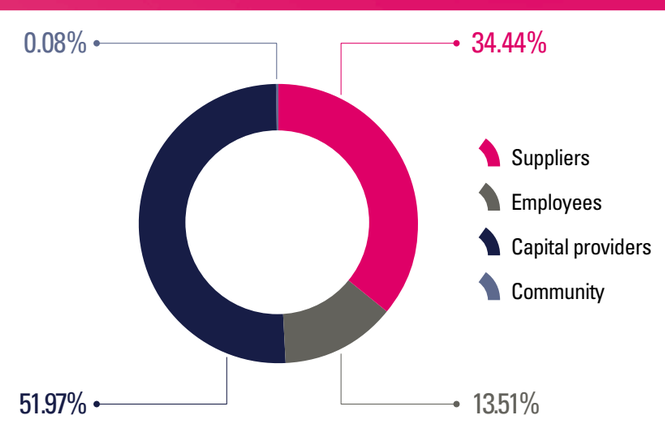


FIGURE 9: DISTRIBUTED ECONOMIC VALUE



1.6 OPEN FIBER NETWORK SOLUTIONS: ACTIVE TO UNITE THE COUNTRY

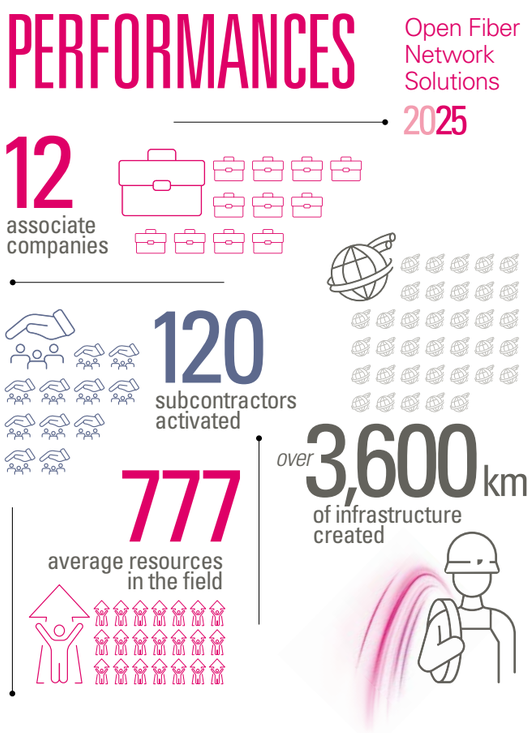
1.6.1 GOALS AND GOVERNANCE

Closing the digital divide between large urban centers and small villages represents a strategic priority to ensure citizens and businesses have access to the services of the future. In this perspective, the **Open Fiber Network Solutions S.c.a.r.l. (OFNS)** Consortium was established in 2022: a synergy between the company and other significant industrial entities aimed at supporting the execution of the cabling plan in white and grey areas. The Consortium acts as a fundamental operational arm for the implementation of the agreements signed with Infratel Italia S.p.A., ensuring compliance with national infrastructure targets.

The initiative aims to enhance the sector's production capacity and address the shortage of specialized labour – a current issue also within the framework of developing plans linked to the National Recovery and Resilience Plan (NRRP) – thereby supporting the implementation of the BUL Plan and the "Italia a 1 Giga" tender. To this end, given the numerous membership requests from both Italian and foreign companies, the Consortium has planned for the entry of new partners into its corporate structure, subject to resolution by the Consortium Assembly. As of December 31st, 2025, in addition to the three founding members, OFNS includes nine other member companies[40]. Participating members must guarantee specific certifications and economic, technical, reputational, and safety requirements, which are priorities in network construction activities under current regulations, as well as compliance with the agreed production capacity. Similar requirements are set for subcontractors.

To ensure greater oversight and focus on operational construction sites throughout Italy and to manage the increase in requested activities across different areas (FWA, Delivery, Maintenance, and Assurance), OFNS has established four territorial areas: North East, North West, Center, and South.

40 Open Fiber holds 99.08% of the capital, Amplia Infrastructures and CIEL each hold 0.01% of the capital, and the nine member companies each hold 0.1% of the capital, collectively representing 0.9% of the capital.



In addition to the Organisation and Management Model pursuant to Legislative Decree 231/2001[41] approved in 2024, OFNS defined and implemented its own Privacy Organizational Model during 2025, which governs roles, responsibilities, and processes to ensure the application of the GDPR and the Privacy Code. The model includes the appointment of a Privacy Liaison, the definition of dedicated guidelines and procedures, and the integration of privacy responsibilities within the corporate organizational chart. These activities constitute an essential element for strengthening the ESG model governance, contributing to ensuring transparency, responsible data management, continuous improvement, and full compliance with the recommendations emerging from internal audit processes.

1.6.2 2025 RESULTS

In 2025, the Consortium grew and, with an average of 777 resources in the field – also thanks to subcontracting – completed **over 3,600 km** of infrastructure in twelve months. Also noteworthy are the more than 58,600 Delivery activations, confirming the expansion into activity perimeters other than Creation.

Revenues recorded in 2025 amount to approximately 55 million euros for white areas, 53 million euros for grey areas, and 21 million euros for Delivery/FWA/Enel Cabin/Assurance activities.

1.6.3 RECRUITING, INCLUSION AND HUMAN CAPITAL MANAGEMENT

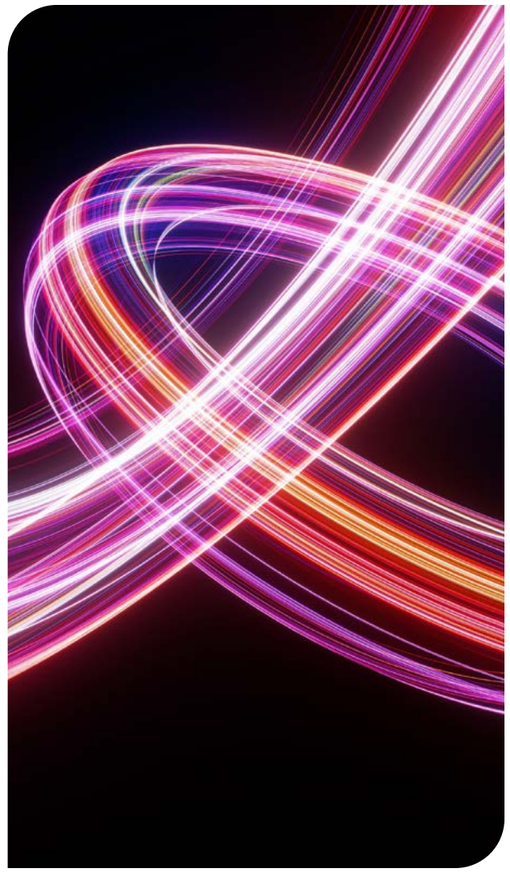
Firmly convinced that the centrality of people is primarily achieved through the protection of their rights – in terms of employment, empowerment, skill-building, and inclusion – the Consortium continued its collaboration throughout 2025 with three Employment Agencies (APL – *Agenzie per il lavoro*) as part of the "Distretto Italia" project, aimed at recruiting and training young people for technical roles such as splicers and installers.

As part of strategies to promote **inclusion** and value **multiculturalism**, the collaboration with the APL Orienta enabled the placement of 39 new resources from the Philippines. Following their hiring, they received linguistic and technical training in compliance with the "Cutro" Decree[42]. These are joined by over 15 non-EU employees (from Tunisia, Peru, and Bangladesh) currently working at OFNS construction sites, hired via the "Flows Decree" (Decreto Flussi) in previous years. These resources were provided with concrete job opportunities, as well as guaranteed housing, board, and transportation. Finally, with the goal of increasing the female workforce, the selection and training of female splicers – to be integrated starting in 2026 – was launched in collaboration with Elis.

To support work-life balance, in line with Open Fiber's initiatives, OFNS renewed its Smart Working agreement, ensuring it remains consistent with corporate operational needs.

Furthermore, thanks to a memorandum of understanding signed on June 7th, 2024[43], a resource from the Velletri Penitentiary was integrated in September 2025 with very positive feedback, offering them a new opportunity through training and work. Recognising the value of work as a tool for social reintegration, the Consortium intends to continue the project in collaboration with the prison administrations of Vigevano, Volterra, and Velletri, aiming to employ incarcerated personnel in back-office activities or on fiber optic sites.

Regarding development and performance monitoring aimed at strengthening key competencies and supporting corporate goals, in June 2025, OFNS implemented a structured **Performance Evaluation** system, with the goal of refining and extending it to the entire company. This tool has been complemented by targeted assessment paths and technical and behavioral training programmes designed in alignment with specific objectives.



1.6.4 CERTIFICATIONS AND PERFORMANCE IMPROVEMENT

In 2025, the Consortium successfully passed the maintenance audits for certifications 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 also maintained the **SOA certification** (OG1, OG3, OS19[44]) required to operate on low and medium-voltage electrical infrastructure, and obtained two additional certifications[45] to be authorized for work on PCs, servers, storage, various IT devices, and communication equipment.

Furthermore, to highlight its focus on occupational health and safety and environmental protection, in 2025 OFNS launched a series of initiatives aimed at improving performance, including:

- the consolidation of the dedicated organizational structure with internal personnel;
- the maintenance of a low-emission vehicle fleet.

41 Approved by the Board of Directors in May 2023.

42 Decree Law 20/2023, converted into Law 50/2023.

43 Protocol between the Department for Digital Transformation, the Department of Penitentiary Administration (DAP) of the Ministry of Justice, Infratel Italia, the ASI Caserta Consortium, ANIE SIT, and several telecommunications operators, including Open Fiber.

44 Work Categories OG 1 "Civil and industrial buildings", OG 3 "Roads, motorways, bridges, viaducts, railways, subways", and OS 19 "Telecommunication network, transmission, and data processing systems".

45 FIHD01_IT and FTTE08_IT.

8 DECENT WORK AND ECONOMIC GROWTH

12 RESPONSIBLE CONSUMPTION AND PRODUCTION

13 CLIMATE ACTION

Fighting climate change

Circularity

Sustainable Value Chain

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

2.1 FIGHT AGAINST CLIMATE CHANGE

2.1.1 THE URGENCY TO ACT

Addressing **climate change** and **global warming**, along with their respective consequences, is the primary challenge facing everyone on the Planet today, from large multinationals to institutions and individual citizens. For the first time, the average temperature for the 2023-2025 period exceeded the 1.5 °C threshold compared to the pre-industrial era[46], surpassing the limits of the Paris Agreement[47]. In Italy, the vulnerability of the territory is evidenced by 811 extreme climate events over the last decade, 97 of which were recorded in the last year alone[48]. These worrying figures highlight the accelerated impacts of human-induced climate change[49]. Reversing this trend requires a **raising of climate ambitions and the achievement of Net Zero by 2050**.

In this context, not only governments but also the private sector is called upon to play a decisive role: launching robust and structured decarbonisation pathways is the only way to guarantee a fair and sustainable development model for future generations[50].

Open Fiber, with its commitment to Italy's digitalisation process, plays a fundamental role in a landscape comprised of highly innovative and high-performance technologies. Indeed, through the widespread rollout of **fiber optic communication networks**, it contributes on one hand to the penetration of digital solutions capable of accelerating the ecological transition in every environment, while on the other, it is committed to building an infrastructure with the lowest possible impact on the environment.

2.1.2 THE JOURNEY TOWARDS NET ZERO

The fight against climate change requires concrete and measurable actions. Open Fiber is fully aware of this and has placed this commitment among the essential pillars of its sustainability strategy, recognising its relevance for corporate success and for the creation of value in the medium-to-long term. In continuity with the measures already adopted to limit environmental impacts, the Company has decided to take up the decarbonisation challenge, formally committing to achieving a Net Zero future – meaning net-zero emissions – through the definition of a dedicated Plan, validated by the Sustainability Committee and approved for the first time by the Board of Directors in 2023.

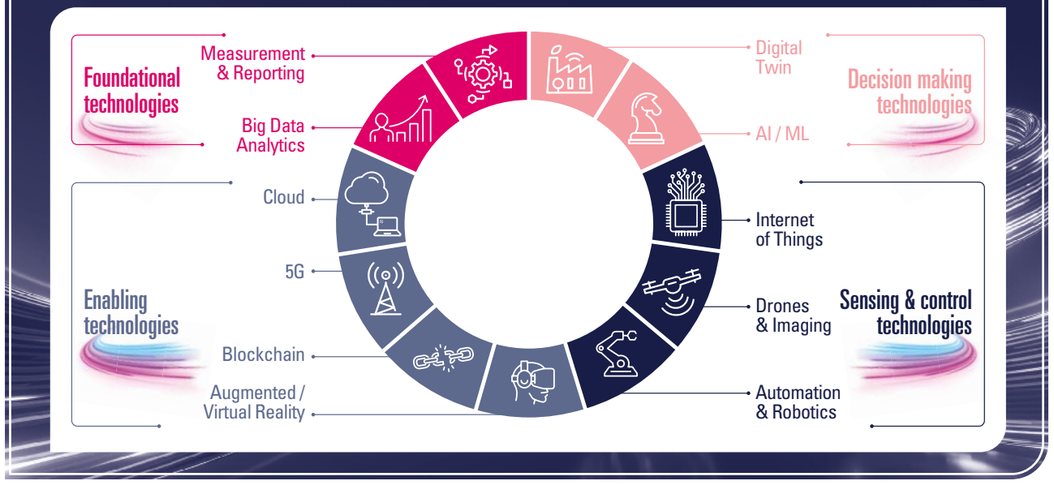
The climate strategy promoted by Open Fiber through the Net Zero Plan is in line with the final goal set by the Paris Agreement, according to the highest level of ambition identified by the Science Based Targets initiative[52], namely, greenhouse gas emission reduction targets aligned with 1.5°C:

- **Scope 1&2**: reduction of absolute emissions by 42% by 2030 and 90% by 2040, compared to the base year 2022[53];
- **Scope 3** (referring to the categories "Purchased goods and services" and "Capital goods"[54]): reduction of absolute emissions by 42% by 2030 and 90% by 2040, compared to the base year 2022.

Digital technologies, if disseminated across all industrial sectors, **could reduce emissions by 20% by 2050 in the three highest-emitting sectors** (energy, materials, and mobility[51]) through four clusters of high-impact digital technologies: **foundational** technologies (big data analytics), **decision-making** technologies (artificial intelligence, machine learning, and digital twins), **enabling** technologies (cloud, 5G, blockchain, and augmented reality), and **sensing and control** technologies (IoT, automation).

At the same time, it is important to ensure that all areas of digital transformation are themselves inclusive and sustainable, directing all private sector actions towards **mitigating the carbon footprint of these digital technologies**.

FIGURE 10: DIGITAL TECHNOLOGIES CLUSTER



TARGETS VALIDATED BY THE SCIENCE BASED TARGETS INITIATIVE (SBTI)

Open Fiber's decarbonisation targets have been **validated** by the **Science Based Targets initiative (SBTi)**, an international organisation that promotes ambitious climate action in the private sector. Through the validation of corporate climate targets, the SBTi ensures that companies' commitments are credible and consistent with the latest scientific climate evidence and global warming containment scenarios. For Open Fiber, this recognition represents a significant achievement, which reinforces the robustness of the decarbonisation strategy and confirms the alignment of the emission reduction targets with the 1.5°C trajectory.

For more details, please refer to the link https://sciencebasedtargets.org/companies-taking-action/

46 Threshold established by the Paris Agreement to significantly reduce the risks and impacts of climate change.

47 Copernicus, https://climate.copernicus.eu/copernicus-2025-track-be-among-three-warmest-years-third-warmest-october-record

48 Legambiente, https://www.legambiente.it/comunicati-stampa/report-cittaclima-in-italia-negli-ultimi-11-anni-oltre-800-eventi-estremi-in-ritardo-i-piani-di-adattamento

49 Copernicus Climate Change Service (C3S), Global Climate Highlights 2024 https://climate.copernicus.eu/global-climate-highlights-2024

50 Survey "Italian business commitment towards Net-Zero", promoted by the United Nations Global Compact Network Italy, in collaboration with the IPSOS institute, which outlines the state of the art as regards the commitment and action of companies on the issues of climate change in general and net-zero in particular, highlighting drivers and barriers characteristic of the Italian context.

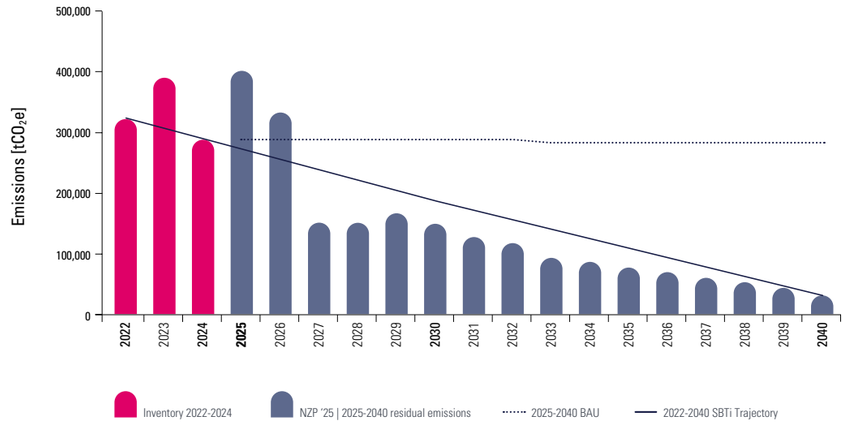
51 Analysis conducted by Accenture, in collaboration with the World Economic Forum – Source: https://www.weforum.org/agenda/2022/05/how-digital-solutions-can-reduce-global-emissions/

52 Partnership between CDP (formerly the Carbon Disclosure Project), the United Nations Global Compact, WRI (World Resources Institute) and WWF.

53 Reference year against which to formulate its emission reduction targets.

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

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



The **evolution of Open Fiber's business** as outlined in the guidelines of the Business Plan, together with the Company's **Energy Plan** and the **external decarbonisation scenarios**, constitute the key elements for the company's decarbonisation path. To these, the Company has added further actions (defined as **supplementary and enabling**) to be adopted to achieve the science-based reduction targets for 2030 and 2040, committing itself in the future to resorting to carbon removals to neutralise "hard to abate" emissions by 2040.

The main decarbonisation actions launched by the Company concern:

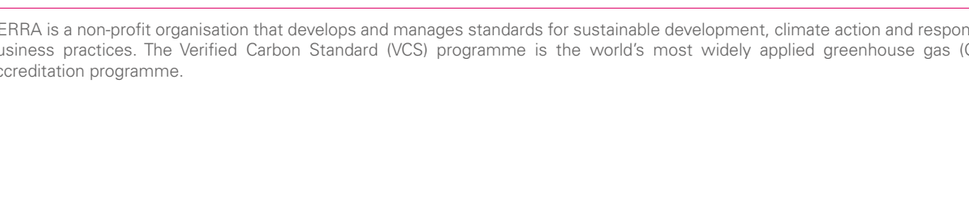
- the installation of energy meters in the head offices, for more effective consumption management;
- the replacement of the lighting system with LEDs at the Rome office;
- the temporary switching off of the air conditioning systems in the head offices during collective closures;
- the progressive conversion of the car fleet with hybrid vehicles;
- the engagement of the supply chain in defining decarbonisation pathways.

ISO 14064-1 CERTIFICATION

In line with its commitments to transparency and reliability, in 2025 Open Fiber certified its GHG emissions inventory for the year 2024 according to the ISO 14064-1[55] standard. This includes emissions produced directly by the Company (Scope 1), indirect emissions related to energy purchased for company consumption (Scope 2), and indirect emissions linked to the value chain (Scope 3)[56].

Furthermore, since 2024, Open Fiber has adopted mitigation measures outside its own value chain (so-called **Beyond Value Chain Mitigation** – BVCM), supporting other economic and social actors in reducing or eliminating greenhouse gas emissions and contributing to accelerating the global transition towards zero emissions. Lastly, the Company purchased 5,500 carbon credits, which made it possible **to offset residual Scope 1 and Scope 2 emissions** for the year 2024. The **correct offsetting was verified by an independent third-party body**, with the issuance of the relative certification. The credits purchased in 2025, certified by VERRA according to the Verified Carbon Standard[57], concern a **run-of-river hydroelectric power production project in Turkey**.

RUN-OF-RIVER HYDRO PROJECT BY BUCAKKISLA HPP



THE PROJECT

The Bucakkısla HPP hydroelectric plant, located on the Göksu river in Turkey, is a run-of-river facility designed to replace fossil fuel power plants, contributing to the production of carbon-free electricity to be fed into the Turkish power grid. The project demonstrates the feasibility of grid-connected run-of-river plants, capable of ensuring greater energy security, improving air quality, fostering a sustainable future based on renewable sources, and enhancing local livelihoods, as well as the sustainable development of the renewable energy sector.

MAIN BENEFITS

- **Social wellbeing**: the project contributes to generating job opportunities during the construction and operation phases of the plants.
- **Technological wellbeing**: this investment will lead to a reduction in Turkey's energy deficit as well as to the diversification of the energy mix, resulting in a reduction of imports.
- **Environmental wellbeing**: reduction of other pollutants compared to the BAU (Business as usual) scenario.

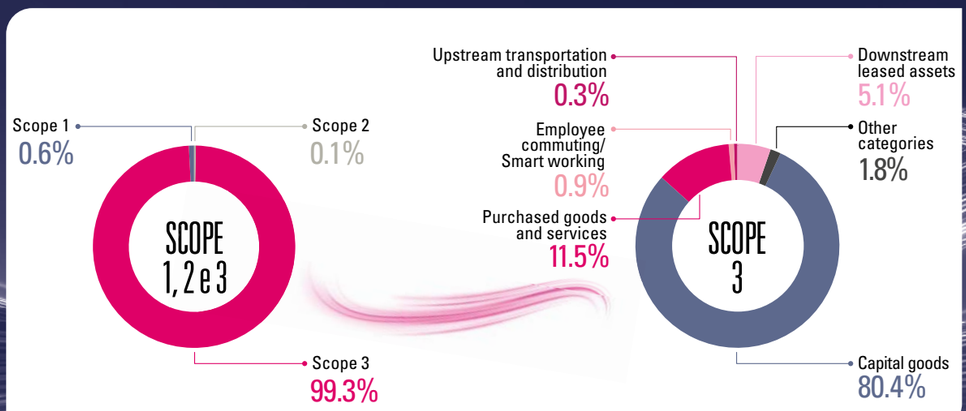
55 In line with the scopes of emissions indicated by SBTi for the setting of emissions reduction targets, this document reclassifies emissions according to the provisions of the GHG Protocol. It should also be noted that, in compliance with SBTi requirements, which envisage addressing reduction targets by covering at least 90% of Scope 3 emissions and avoiding dispersing efforts on minority categories, Open Fiber considers a baseline of 323,909 tonnes of CO_2e (including Scope 1, 2 and 3 emissions for Scope 3 categories "Purchased goods and services" and "Capital goods"). 909 tonnes of CO_2e (including Scope 1, 2 and 3 emissions for the Scope 3 categories "Purchased goods and services" and "Capital goods"), instead of the total 330,397 tCO_2e of the 2022 greenhouse gas inventory.

56 Within the scope of such indirect emissions, the following categories applicable to the business have been quantified: Purchased goods and services, Capital goods, Fuel and energy-related activities, Upstream transportation and distribution, Waste generated in operations, Business travel, Employee commuting/Smart working, and Downstream leased assets.

57 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) programme is the world's most widely applied greenhouse gas (GHG) accreditation programme.

2.1.3 OPEN FIBER CARBON FOOTPRINT

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



Emission categories (GHG Protocol)	U.M.	2025
Scope 1 - direct emissions	**tCO_2e**	1,925.8
Scope 2 - indirect emissions from purchased electricity	**tCO_2e**	406.3
Scope 3 - other indirect emissions	**tCO_2e**	342,736.9
Purchased goods and services	tCO_2e	39,537.2
Capital goods	tCO_2e	275,628.7
Fuel - and energy - related activities	tCO_2e	5,054.1
Upstream transportation and distribution	tCO_2e	1,159.0
Waste management	tCO_2e	493.7
Business travel	tCO_2e	508.2
Employee commuting / Smart working	tCO_2e	2,968.2
Downstream leased assets	tCO_2e	17,387.8

The inventory of Open Fiber's emissions[58] in 2025 consisted of:

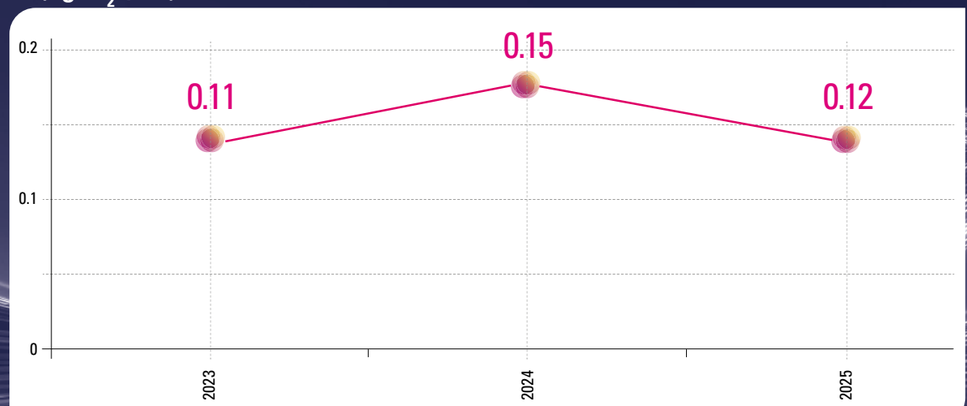
- 2,332 tonnes of CO_2e in terms of Scope 1 and 2 emissions (respectively, 1,926 tCO_2e and 406 tCO_2e)[59], with an average intensity of 0.12 kg di CO_2e of CO_2e per connected property unit, considering 20.2 million connected property units;
- 342,737 tonnes of CO_2e for Scope 3 emissions, mainly due to the categories "Purchased goods and services" and "Capital goods", which represent approximately 92% of Scope 3 total emissions.

As regards the Consortium, in 2025 there were 3,139 tonnes of CO_2e for Scope 1 and 2 emissions (respectively, 3,125 tCO_2e and 14 tCO_2e). Given that the Consortium is involved in the construction of Open Fiber's fiber optic infrastructure, Scope 3 emissions are already included in Open Fiber's report on other indirect emissions.

58 The data shown in the pie charts make reference to Open Fiber S.p.A. (market-based approach). Emissions relating to Open Fiber Network Solutions S.c.a.r.l. are included in the scope 3 emissions of Open Fiber S.p.A. For details of the emissions produced by Open Fiber Network Solutions S.c.a.r.l., please refer to paragraph 7.5 "Data tables and performance indicators".

59 According to a market-based approach. The market-based approach considers only the portion of electricity that does not have a Guarantee of Origin. It offers an idea of the benefits in terms of commitment to the fight against climate change that Open Fiber has achieved through the use of energy from renewable sources.

FIGURE 13: EMISSIONS INTENSITY TREND (SCOPE 1 E 2) PER HOUSEHOLD PASSED ($kgCO_2e$/HP) - OPEN FIBER S.P.A.



2.2 RESPONSIBLE ENERGY USE

2.2.1 ENERGY SUSTAINABILITY

Defining a sustainable energy strategy necessarily requires the adoption of a solid and effective policy that delivers results over time. Open Fiber bases its action plan on a constant commitment to improving energy performance, focusing on innovative and sustainable solutions to optimise efficiency and reduce environmental impact. Since 2023, the Company has adopted an Energy Management System certified according to the **UNI CEI EN ISO 50001** standard[60] standard in order to monitor consumption from office buildings, technological sites and the corporate car fleet, under the guidance of the Energy Management team. This system **fosters competitiveness, technological innovation, circularity and business resilience**, in addition to ensuring regulatory compliance[61]. Senior management is directly involved in the approval of all energy optimisation initiatives developed



60 Energy management systems - Requirements with guidance for use.

61 Legislative Decree 102/14 and Law 10/91.

PILLARS OF OPEN FIBER'S ENERGY MANAGEMENT SYSTEM

COMPETITIVENESS

Implementation of **corporate energy policy** able to identify inefficiencies, allowing to generate the same level of services with a net reduction of the resources employed

TECHNOLOGICAL INNOVATION

The search for efficiency by applying cutting-edge technological solutions, able to increase the value and performance of the company's assets

ENVIRONMENTAL SUSTAINABILITY

Accelerator of the sustainability business level, in line with the founding value of the company, in favor of the circular and green economy

BUSINESS EVOLUTION

Energy efficiency as a way to look for new models of business/revenues streams, able to diversify the offered services

ENERGY PLAN

Open Fiber's Energy Plan represents the main tool through which the Company intends to achieve continuous improvement, namely the attainment of efficiency and rationalisation targets for its own consumption. The Plan includes **Infrastructural interventions** applied to offices, technological sites and vehicles – aimed at monitoring, rationalising and reducing energy consumption, as well as promoting the use of energy from renewable sources and gradually decoupling from fossil energy sources – and **Operational Management interventions** related to business processes – aimed at digitalising activities, optimising energy efficiency and promoting best practices and virtuous behaviours.

as part of energy system management and in the definition of the **annual Energy Plan**, which includes energy efficiency projects based on a technical and economic cost-benefit analysis.



ENERGY CONSUMPTION MONITORING

The first step towards effective energy resource management is **monitoring**: for this reason, the Company has planned the integration of a monitoring system based on **Internet of Things (IoT)** technology to be installed at technological sites and office buildings. The project allows for the collection and management of energy consumption data through dedicated business intelligence software, with the aim of optimising energy performance and contributing to energy and cost savings.

PURCHASED ELECTRICITY: 100% OF IT COMES FROM RENEWABLE SOURCES

The reduction of emissions generated by the operation of its network is at the heart of the corporate strategy: in line with this commitment, in 2020 Open Fiber began an incremental path of purchasing energy from renewable sources which, since 2022, has reached **100% of purchased electricity** coming from renewable sources[62].

SOLAR ENERGY AT THE SERVICE OF THE NETWORK

Since 2022, Open Fiber has built photovoltaic plants to serve its network: thanks to the plants at the **technological sites (PoP) of Settimo Milanese, Castelnuovo di Porto, Casoli, Anguillara Sabazia, and Novi Ligure**.

SUSTAINABLE FLEET MANAGEMENT

Open Fiber's commitment also extends to the management of its **fleet of vehicles**, with a plan to convert the fleet from internal combustion engines to hybrid solutions.

CAMPAIGNS RAISING AWARENESS ON EFFICIENT ENERGY USE

Open Fiber promotes awareness campaigns to encourage the reduction of energy consumption, both in the office and at home, and creates training content for all employees on its energy management system, offering practical advice for a more efficient use of resources through simple daily measures.

2.2.2 ENERGY PERFORMANCES

The main energy consumptions of Open Fiber are related to the use of electricity for the company premises and technological sites (approximately 92% of the total energy consumed) and to diesel and gasoline for the corporate vehicle fleet (approximately 8%)[63]. For the Open Fiber Network Solutions Consortium, on the other hand, almost the entirety of consumption is attributable to the use of fuel for the vehicle fleet (approximately 99.6%), with a small share of electricity for the operation of warehouses (approximately 0.4%)[64].

In 2025, a share of approximately 222,210 GJ of energy from **renewable sources** was reached

62 Reference is made to energy supplied by Open Fiber S.p.A. and certified through Guarantees of Origin (provided for by Directive (EU) 2018/2001).

63 The share related to natural gas consumption for heating is less than 1%.

64 The share related to natural gas consumption for heating is less than 0.1%.

(mainly through Guarantees of Origin)[65], representing 75% of the total energy consumed by Open Fiber and the Consortium.

The increase in energy consumption recorded in 2025 is attributable to two determining factors. Firstly, the expansion of the business led to an increase in the number of connected real estate units, technological sites, and the operational workforce. In parallel, the growth of the Open Fiber Network Solutions Consortium's activities significantly impacted the energy balance, contributing approximately 47,793 GJ in the reporting year.

HIGHLIGHTS

Open Fiber and Open Fiber Network Solutions 2025

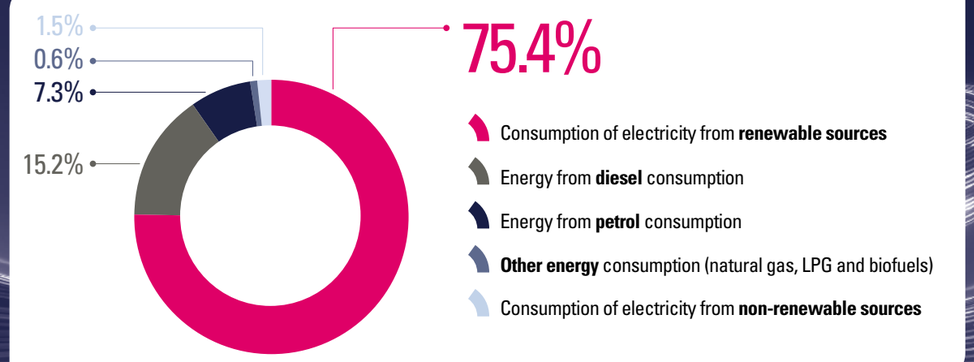
total consumption

294,869 GJ

100%

electricity purchased by Open Fiber **coming from renewable sources**

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



2.3 INFRASTRUCTURE WITH A LOW ENVIRONMENTAL IMPACT

Open Fiber's Mission integrates the objective of cabling Italy with the duty to preserve its natural and cultural heritage. This commitment translates into operations that minimise the impact on communities and the environment through the adoption of innovative laying techniques and the use of materials with a low carbon footprint. Choosing sustainable raw materials and building infrastructure with reduced energy consumption means ensuring not only more effective communications but also a sustainable development model. FTTH **(Fiber To The Home) optical fiber**, therefore, represents an enabling technology for the **ecological transition** and has a reduced impact on the environment.

2.3.1 FTTH: A SUSTAINABLE TECHNOLOGY

As confirmed by the FTTH Council[66], optical fiber represents the solution of choice for connectivity with a low environmental impact. Its distinctive characteristics – flexible and resistant filaments, high transmission capacities and a bandwidth ideal for long distances at high speeds (bitrate) – guarantee excellent performance with maximum efficiency. Thanks to its immunity to electromagnetic interference, small size and low weight, the FTTH architecture proves to be a lightweight, durable and **intrinsically sustainable infrastructure**. These properties ensure the intrinsic efficiency of the infrastructure and a significant reduction in maintenance interventions. This results in direct **environmental benefits**: from lower energy consumption to the optimisation of resources, through to the containment of waste production and greenhouse gas emissions.

These considerations take on greater significance when performing a comparison with the performance of traditional copper networks, which require mining processes and high-emission intensive processing, in addition to exhibiting electromagnetic leakage and the need for frequent maintenance, with more recurring construction sites that generate further waste and emissions.

From the comparison of the two solutions, it clearly emerges how greater digitalisation of the country corresponds to a lower waste of resources.

65 The energy supplied and certified through Guarantees of Origin (as provided for by Directive (EU) 2018/2001) comes from renewable source plants as certified by the certification system managed by the Energy Services Manager in accordance with the regulations in force. A residual share of energy from renewable sources is self-produced.

66 The FTTH Council Europe is an industry association whose mission is to promote fiber optic connectivity throughout Europe.

FIBER OPTIC CABLES PRODUCTION

Optical fiber consists of a set of filaments made of glassy[67] or polymeric materials, coated with acrylic resins to provide the mechanical resistance necessary for handling and winding onto reels. Copper cables, in contrast, consist of a raw material that must be extracted from mines located in a few countries worldwide (particularly Latin America and Africa) or must be produced through specific recycling processes. The extraction of 2 kg of the raw material, required to produce a copper wire approximately 60 metres long, produces roughly 1,000 kg of CO_2e. Producing the equivalent length of optical fiber cable would produce 0.06 kg of CO_2e, less than 0.01% of the emissions associated with copper. Furthermore, since transmission speed via copper cables is directly related to the weight of the cable used, much more than 60 metres of copper[68] would be required to match the performance of the same length of fiber cabling. In addition, while optical fiber is produced through a spinning process, copper must then be processed using procedures that create further dust and emissions.

TRANSPORTING AND LAYING FIBER OPTIC CABLES

Optical fibers have reduced size and weight compared to copper cable: this allows for the use of low-impact excavation techniques during the construction phase. This reduces not only the network rollout timelines but also the emissions associated with the works. Furthermore, by being able to install more transmission capacity than necessary in the same space – without incurring additional operating costs or further emissions – the need for supplementary installations at a later stage is eliminated.

→ *For more information, see the **in-depth** box "**Studying innovative and sustainable laying materials**" and the paragraph Non-invasive laying techniques.*

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 leakage into the environment. Furthermore, while copper networks require amplifiers over distances in the range of 100 m to 2 km, fiber can support 100 km without them, thereby reducing the number of active devices: this is equivalent to having hundreds of active nodes within 40 km² for copper networks compared to a single active node for FTTH networks, which entails significantly higher electricity consumption (including for powering cooling systems) and the need for a more energy-intensive structural architecture compared to that of fiber.

FIBER OPTIC NETWORK MAINTENANCE AND END OF LIFE

In terms of "lifespan", optical fiber cable has an estimated duration of between 25 and 38 years[69] and represents the best solution even in extreme weather conditions, as it is less subject to degradation caused by humidity, frost, or electrical interference. Copper, on the other hand, can be subject to oxidation, corrosion, and short circuits which, over time, deteriorate its efficiency and shorten its operational life, requiring replacement interventions. Furthermore, being a high-value material, it is often subject to theft, with serious consequences for network operation.

Finally, technological upgrades of the fiber network do not require any intervention on the distribution network, but only modifications at the exchange and the user's premises.

→ *For more information, see the **in-depth** box "**Effective and environmentally friendly network monitoring**".*

USE OF A FIBER OPTIC CONNECTION

When comparing the optical fiber connection with the copper one, a further environmental and economic advantage is revealed, one that is linked to the different performances experienced by end users. Considering constant and uninterrupted use, a copper cable connection involves an energy consumption per user of 10 Wh, which drops to about 2 Wh with a fiber optic connection, generating an estimated average saving of 8 Wh per user.

STUDYING INNOVATIVE AND SUSTAINABLE LAYING MATERIALS

Open Fiber has successfully trialled an innovative solution to reduce the weight of **concrete manholes**, thanks to a reduction in thickness and the optimisation of their composition, without compromising the mechanical characteristics and performance of the original product.

Furthermore, the Company has long been committed to researching alternative solutions for the use of **cable protection** pipes produced with innovative materials and a lower environmental impact. These are smooth-surfaced, high-density polyethylene pipes for underground laying to protect optical fiber cables, compliant with the CEI EN 61386-24 standard and holding the PSV (Plastic Second Life) mark[70].

67 For example, oxide compounds such as silicon oxide, phosphorus oxide and/or germanium oxide.

68 Carbon Smart, "Our digital infrastructure needn't cost the earth".

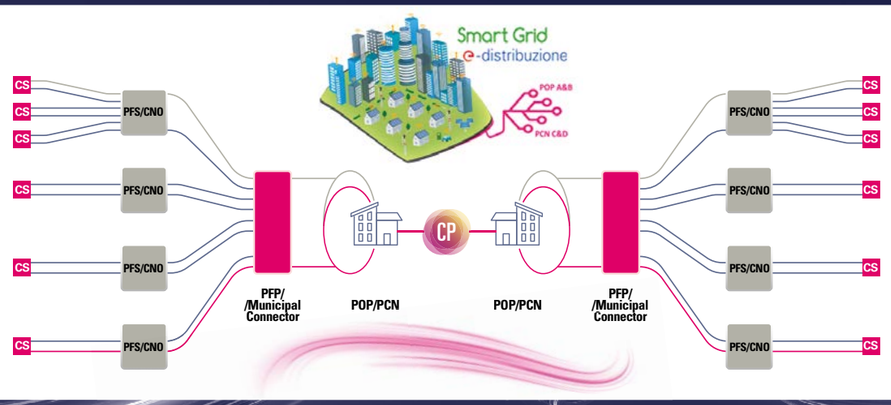
69 Source: Carbon Smart "Our digital infrastructure needn't cost the earth".

70 An environmental product certification system dedicated to materials and manufactured goods obtained from the recovery or recycling of plastic waste.

EFFECTIVE AND ENVIRONMENTALLY FRIENDLY NETWORK MONITORING

The installation of the **OTDR (Optical Time Domain Reflectometer)** allows Open Fiber not only to ensure network efficiency and service continuity but also to reduce the costs and impacts associated with fault analysis and diagnosis within its optical fiber network. Thanks to the OTDR, it is indeed possible to proactively detect any damage quickly and accurately, providing measurement results within minutes and thus enabling timely and effective intervention. This significantly improves and optimises the maintenance process, resulting in lower time costs for interventions, as well as a saving of resources (human, mechanical, and natural) and a reduction in environmental pollution (for example, lower greenhouse gas emissions related to travel).

FIGURE 15: PROJECT DSO 4.0



Among the projects that Open Fiber is pursuing, with positive impacts in terms of sustainability, is the **project DSO 4.0**, currently being implemented for e-Distribuzione, which involves the construction of a stand-alone fiber optic network. This network connects all of e-Distribuzione's electrical substations to create a national Smart Grid connected entirely through optical fiber.

The advantages of using the fiber optic network include reduced latency times, improved network resilience and greater reliability thanks to fiber optic-based Smart Grid monitoring [71].

2.3.2 NON-INVASIVE LAYING TECHNIQUES

To further optimise its environmental performance, Open Fiber carefully analyses the territory and existing infrastructure, so as to build the network with minimum impact, leveraging what is already available whenever possible.

Thanks to the most innovative laying techniques, the reuse, refurbishment, and replacement of utility networks take place with zero or limited use of open-trench excavations, removing very small volumes of soil and using miniaturised network accessories that require lower raw material consumption.

71 For more details, see paragraph 5.7 "Smart Grid".

Reuse of existing infrastructures

Prioritising the reuse of existing infrastructure allows Open Fiber to reduce environmental impact and inconvenience to the community. To encourage this virtuous practice, the Company promotes agreements with Municipalities that provide for the free connection of public buildings such as schools, offices, and libraries, transforming the provision of utilities into tangible value for citizens.

A specialised Open Fiber team and the operator or owner of the existing infrastructure verify the state of the infrastructure, the possibility of coexistence of different services, and any operating and maintenance requirements. The methods for reuse vary according to the purpose of the infrastructure (for optical cables, telecommunications and ancillary networks, electricity networks, railway networks, etc.). Should it not be possible to work **on the road**, Open Fiber resorts to **aerial laying** by using poles already present in the area and connecting cables with special clamps and suspensions. In this case, it is possible to reuse existing routes since fiber, creating no leakage of any kind, can be laid close to other infrastructure, such as electricity cables.

Low-impact excavation techniques

When the reuse of existing infrastructure is not possible, Open Fiber adopts low-impact excavation techniques, with benefits for the community and the environment:

- **Mini-trench**[72] - an excavation suitable for asphalted or cemented surfaces with a compact material base. Upon completion of the laying process, a definitive cold backfill is provided using a single-component controlled-shrinkage mortar, benefiting the time required for road surface restoration. The mini-trench can be traditional or reduced (five centimetres wide), allowing for faster laying and restoration. The excavation and suction phases of the resulting waste material are simultaneous, thus accelerating the trench cleaning phase, and include dust suppression methods to keep the site clean and minimise inconvenience to citizens.
- **Micro-trench** - an even more cutting-edge excavation technique (2.5 cm x 30 cm) that reduces the volume of soil to be removed by at least 75% (over 40 tonnes per km) and can be used if specific environmental conditions are met. The micro-trench allows for definitive restoration starting from the backfilling of the excavation with a special cement mortar that ensures rapid setting as well as perfect adhesion to the trench walls, requiring fewer machines and resulting in faster construction sites.
- **No-dig -** trenchless directional drilling of the ground requiring only two localized excavations, one at the start and one at the end of the route, eliminating the need for open-trench excavations and minimising the materials used, waste to be disposed of, and restoration work. According to a study based on the model of the Federation of Swedish Industries, the no-dig technique allows for cost savings of 80% and a reduction in workplace accidents of 67%.

To regulate these innovative techniques, Open Fiber participates in the **technical committee** responsible for defining the relevant guidelines, alongside road owners, Regional and Municipal authorities, universities, major telecommunications operators, installation companies, and excavation machinery suppliers. The objective is to define infrastructure construction methods that ensure a lower impact on the environment, cost optimisation, and maximum rollout speed.

In 2025, Open Fiber continued to make significant progress in the rollout of the optical fiber network in

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

Italy. As of 31 December 2025, in **Clusters C&D**[73], over 90,100 km of ultra-fast infrastructure had been laid, completing 99% of the planned project. Overall, the network extension exceeded 162,700 km, with a contribution of 38,800 km in **Clusters A&B**[74] and 33,800 km in **Cluster AGF (Grey Areas)**[75]. In the same year, the Company intensified the reuse of Ultranet and Unifiber assets, enhancing FTTH technology through pre-existing infrastructure in support of the "Piano Italia a 1 Giga", financed by PNRR funds.

In cases where it was not possible to proceed with the reuse of existing infrastructure, low-impact excavation techniques such as mini-trench, micro-trench, and no-dig were adopted.

#GOODSTORIES

San Polo D'Enza

Fiber as an infrastructure for territorial sustainability

The completion of the FTTH network in San Polo d'Enza represents a strategic intervention for sustainable digital development, **achieved for 78% through the reuse of existing infrastructure**, with tangible environmental benefits. Over 3,390 property units are now connected by a network capable of improving public services, smart mobility, and territorial monitoring. The intervention in the mountain hamlet of **Grassano** is particularly significant, where connectivity was historically limited. «*A leap in quality was needed* – explains Mayor Franco Palù – *today, fiber guarantees performance up to thirty times higher than the old ADSL.*» An infrastructure that enables even mountain areas to work, do business, and remain competitive. Fiber thus confirms itself as a tool for social cohesion, capable of bridging the digital divide and strengthening the right to digital citizenship across the entire municipal territory.

2.4 WASTE MANAGEMENT

Open Fiber protects the territory in which it operates by investing in environmentally friendly technologies, deploying an infrastructure that, by its very nature, is high-performing and eco-sustainable, and adopting an Integrated **Management System for Quality, Occupational Health and Safety, and the Environment**[76]. Among other things, this system aims to continuously monitor and improve the environmental performance of both the Company and the entire value chain.

As highlighted in the previous paragraphs, the non-invasive laying techniques favoured by Open Fiber allow for a significant reduction in the quantity of waste materials to be managed as waste.

The waste directly produced by Open Fiber is primarily comparable to municipal waste, arising from office activities at the company's premises. As such, it is managed through separate collection and handed over to the public collection service, then mostly sent for recycling and recovery at authorised facilities. Occasionally, special waste may be generated should certain stocks of materials procured for network construction and maintenance become obsolete or unusable. In these cases, the Company evaluates potential reuse by third parties[77] or, whenever possible, allocates this waste to recovery operations conducted by authorised entities.

The majority of waste from **network construction and maintenance activities**, as well as from the maintenance of company premises, is produced by external suppliers, who are responsible for its management. In such circumstances, the generation and management of waste through recovery or disposal are the responsibility of the contractors and subcontractors operating under the contracts. These entities are evaluated both during the qualification phase (in terms of technical skills and necessary qualifications[78]) and during the execution of works, thanks to specific clauses that suppliers are required to respect. This is aimed at ensuring full compliance with current legislation.

The waste produced by the **Open Fiber Network Solutions** consortium largely derives from the waste materials generated during the excavation phase for cable laying. Their management follows specific procedures defined within the Environmental Management System, certified according to the ISO 14001 standard, also with the support of specific software for managing the entire waste supply chain.

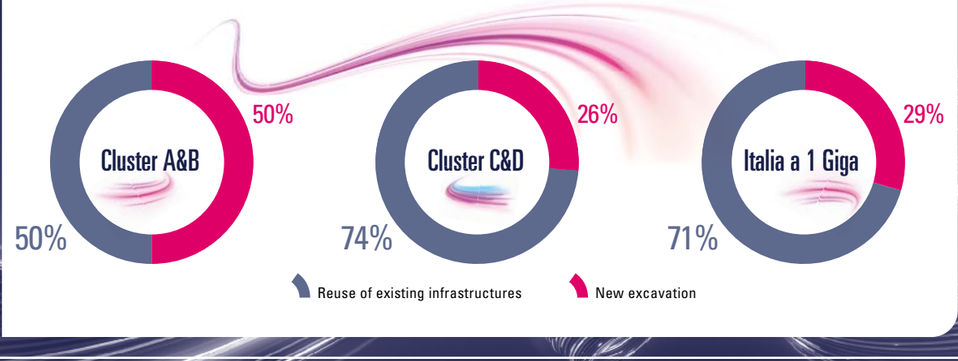
Open Fiber controls and monitors data and information attesting to the correct management of special waste by the suppliers and contractors involved in the activities. Controls and documentation requests are governed by the contracts signed between the parties and by Open Fiber's environmental management system, with which contractors are obliged to comply.

The main control and monitoring activities include the Waste Identification Forms (FIR) issued as part of the contracted activities, sample verification of the MUD[79] forms submitted by the suppliers/contractors involved in the activities, on-site inspections of the correct management of produced waste or temporary storage areas, and on-site and documentary verification of legislative compliance regarding operational waste management, also aimed at confirming the absence of cases of waste abandonment.

Controls are carried out at multiple levels, through systematic checks performed by the Works Director (first-level controls) and sample checks carried out by the Operational HSEQ Operating Unit[80] (second-level controls) by completing specific checklists focused on monitoring the significant environmental aspects associated with the activities. In addition, there are sample checks performed during internal Management System audits, carried out by the Quality & HSE Operating Unit.

The results of these controls are also processed through the Open Fiber portal, which allows for the monitoring of any non-conformities found, and are periodically reported to the Management Team.

FIGURE 16: EXCAVATION METHODS FOR THE DIFFERENT CLUSTERS



73 With reference to new excavation activities for Clusters C&D, Open Fiber utilised mini-trench, micro-trench and no-dig techniques in 75% of cases, and traditional excavation techniques in the remaining 25%.

74 The new excavation activities for the A&B Cluster have not changed compared to 2024 as works did not continue in 2025.

75 For new excavation activities within the AGF Cluster, Open Fiber used minitrench, microtrench, and no - digtechniques in 77% of cases, whereas traditional excavation techniques were used in 23% of cases.

76 Open Fiber's QHSE&Energy Management System obtained UNI EN ISO 14001 certification in 2020. For more details on the management systems adopted by the Company, see paragraph 6.3 Quality, Occupational Health and Safety and Environment Management.

77 By sale in any form allowed by the law.

78 Possession of authorisations by the destination facilities, registration with the National Register of Environmental Managers (Albo Nazionale Gestori Ambientali) for transporters, etc.

79 Single Environmental Declaration Form.

80 Since 20/05/2025 the Operational HSEQ Operating Unit is part of the People & Sustainability Department.



Protection and development of human capital

Diversity, Equity & Inclusion

03. HUMAN CAPITAL

3.1 OUR PEOPLE

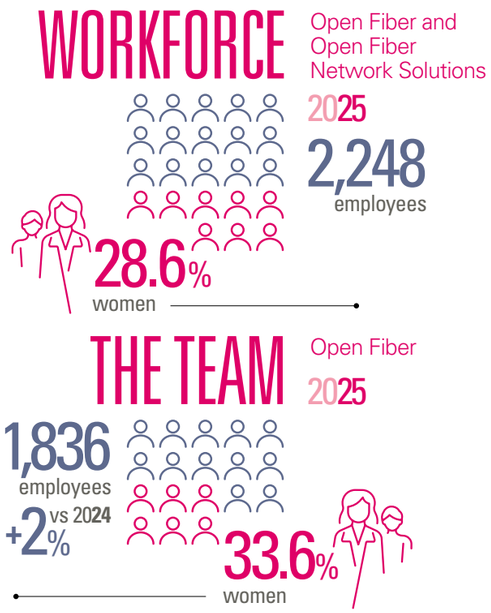
At Open Fiber, the technological challenge and the digitalisation of Italy are not merely industrial objectives but reflect a profound sense of responsibility. At the heart of this mission lies a distinctive identity, fueled by a corporate culture that **promotes talent and values diversity as a driver of innovation**. Here, the passion and expertise of every individual come together to create connections that go beyond the fiber network – an inclusive and sustainable ecosystem where merit, excellence, and personal growth are the protagonists of an environment that is inclusive, sustainable, and authentically human.

It is people who make the difference in business development processes. Open Fiber's way of doing business rests firmly on specific pillars: skills and experience. Thanks to this investment in people, women and men contribute actively and productively every day to the Company's success, with their eyes always on the future.

Since 2024, the corporate values of the **Triple A (Ambition, Action, Accountability)** and **Team Spirit** have guided every single action of Open Fiber, which is committed to being a place of growth as well as work, fostering the continuous updating and learning of skills necessary to meet the challenges of a rapidly evolving context.

Open Fiber's "excellence model" brings together the abilities, behaviours, and skills of those working within it and blends them with the culture, Mission, and corporate values, **to allow everyone to express their professional and human potential**. This model guides all development, training, evaluation, and feedback processes, fostering professional growth and creating the conditions for each person to follow a career path consistent with their abilities and organisational opportunities.

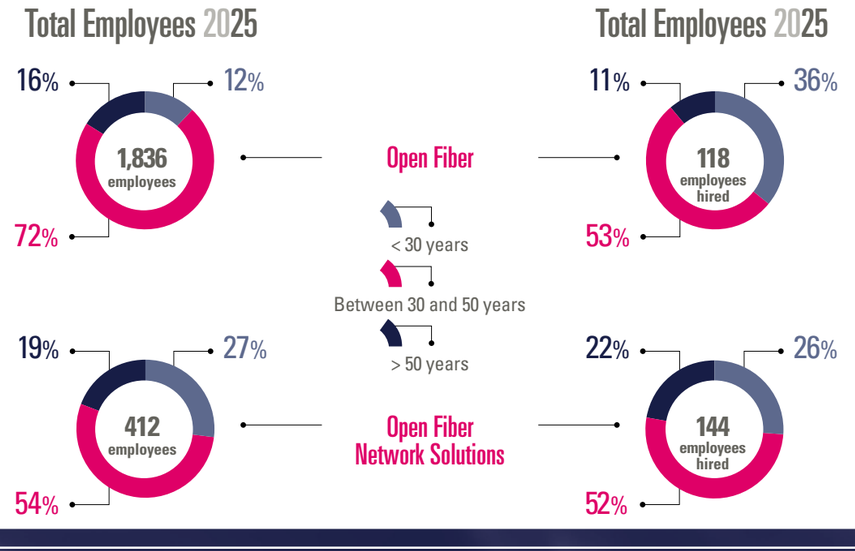
At Open Fiber, inclusion is not just a value, but the foundation of a corporate culture that prizes uniqueness. For this reason, the Company invests in strengthening the **welfare system** to make it an increasingly **modern and flexible** tool. Thanks to this approach, the Company maintains high levels of stable employment and continues to grow, expanding its workforce every year. The adoption of genuine **work-life integration**, including through **Smart Working**, has contributed to further strengthening this model, promoting well-being, attractiveness, and employment continuity.



During 2025, the **Open Fiber team** increased its workforce, reaching **1,836 employees** by 31 December (an increase of approximately 2% compared to 2024), mainly concentrated in the cities of Rome and Milan: women make up 33.6% of the workforce (consistent with previous years). 71.8% of employees fall within the 30 to 50 age group, while 16.4% are in the over-50 bracket.

In the same year, **Open Fiber Network Solutions** reached a total of **412 employees**, recording a workforce growth of **20.5%** compared to the previous year. The staff is characterised by a preponderance of men over women (who represent 6.6% of employees), a factor attributable to the type of activities carried out by the Consortium and the category of employees (74.5% manual workers). Regarding age groups, the majority of employees fall within the 30 to 50 range (54.1%), followed by the under-30 bracket (27.2%).

FIGURE 17: OPEN FIBER AND OPEN FIBER NETWORK SOLUTIONS PERSONNEL - DISTRIBUTION BY AGE GROUPS



3.1.1 EMPLOYER BRANDING

Since its inception, Open Fiber has identified **employer branding** as an essential strategic lever for the company's development. The approach adopted is based on the sharing of a unified vision and a cutting-edge **employee experience**, fuelled by synergetic collaboration and a widespread sense of responsibility. This has made it possible to build a working environment that encourages the expression of individual talent, where the enhancement of diverse potentials translates into a participatory and sustainable context, capable of generating excellence in performance.

Evidence of the effectiveness of this strategy is the 2025 renewal of two important awards for people management and development policies: **Top Employers Italy** – issued by the Top Employers

AWARDS

top EMPLOYER Italia Italy 2025
FOR A BETTER WORLD OF WORK

Great Place To Work. Certified
NOV 2025-NOV 2026
ITALIA

Institute, the certifying body for excellence in HR best practices – and **Great Place To Work (GPTW)** – issued by the international organisation of the same name, which for forty years has specialised in corporate climate analysis, employer branding, and employee engagement.
With the goal of enhancing talent and strengthening collective success, the **Onboarding process** has been completely revamped, introducing in-depth elements related to Open Fiber's core business to facilitate and speed up the integration of new hires. This new journey eases the welcome process, the understanding of the corporate culture, and the sharing of the "Triple A" corporate values.



THE TRIPLE A: THE VALUES OF OPEN FIBER'S PEOPLE

To create a digital highway that ensures network coverage in both large cities and small towns, Open Fiber promotes an organisational culture oriented towards the values the Company seeks in its people:
Ambition: to develop and communicate Open Fiber's vision in a clear and engaging way, effectively transmitting it to all internal and external stakeholders. Being able to exceed objectives, improve personal and team performance, and create a stimulating and rewarding work environment that fosters motivation and engagement.
Action: to anticipate, identify, and actively address challenges and opportunities by developing effective actions to implement performance with high standards. Generating initiative and practical solutions for problem-solving and managing complex situations, constantly improving workflows, performance, and processes.
Accountability: taking responsibility for results by adopting behaviours consistent with a context where agility and flexibility become indispensable for governing complexity rather than being overwhelmed by it.
At the core of all corporate results is **Team Spirit**, which guides Open Fiber's people towards achieving common goals through inclusive leadership and genuine collaboration, where every voice matters.

3.1.2 TALENT ATTRACTION

For Open Fiber, supporting teamwork and fostering a stimulating work environment are not just guiding principles, but competitive advantages capable of making a difference. In this scenario, every resource finds the space to fully express their skills, transforming a sense of belonging and professional pride into the engine that increases internal knowledge assets and distinguishes the Company in the market.
Open Fiber's strategy for **attracting new talent** and strengthening **employer branding** is developed through:

- the implementation of various **attraction channels** and **sourcing tools**, such as the corporate database and the "Careers" section of the company website, also supported by external headhunting firms and the use of major social recruiting platforms;
- participation in innovative and **digital-oriented** initiatives, which consolidate Open Fiber's identity as a **Best Digital Workplace**;
- Open Fiber's presence as an active employer at major **Italian academic hubs**, through a virtuous circuit of **ad hoc partnerships and career days** focused on engineering excellence[81];
- participation in employer branding events, with particular attention to **local** presence, leveraging the contribution of our people as ambassadors;
- the support and promotion of projects with a **social impact**, such as PCTO[82].

SOCIAL RECRUITING CHANNELS

In 2025, Open Fiber strengthened its **employer branding** strategy within social recruiting channels, particularly on the LinkedIn and Indeed platforms. These digital spaces represent more than just recruitment tools; they are true communication ecosystems where the corporate vision meets the professionals of the future. Over the past year, more than **28,000** applications were received from advertisements published on the LinkedIn platform, approximately **9,000** were received through the "Careers" section of the corporate website, while spontaneous applications exceeded 5,000.

NO FIBER? NO PARTY!

No Fiber? No Party! In 2025, the "No fiber? No party!" initiative continues – a circuit of **Career Day** events offering students and recent graduates the opportunity to meet Open Fiber managers and recruiters, as well as to gain a deeper understanding of the world of ultra-fast fiber optics. This year, particular attention was again dedicated to female STEM professionals and individuals from vulnerable groups, with initiatives aimed at fostering workplace inclusion and equitable access to professional opportunities. The Company continued to promote initiatives to strengthen the network with major university hubs across the national territory, also joining digital-oriented events to facilitate encounters with young talent. During the year, Open Fiber participated in **six Career Days**, involving thousands of participants including students and visitors, and promoting orientation activities, webinars, CV reviews, and introductory interviews.

81 For further details, please refer to section 4.4.1 "Partnerships and innovation in support of culture".

82 PCTO - Percorsi per le Competenze Trasversali e l'Orientamento. For further details, please refer to section 4.4.1 "Partnerships and innovation in support of culture".

3.2 GROWTH AND TRAINING OF OUR EMPLOYEES

3.2.1 TRAINING

Open Fiber has built its foundations on two strategic pillars: **innovation** and the **centrality of its people**. In this context, **training** serves as a fundamental asset to support the achievement of increasingly ambitious goals. In a market characterised by constantly shifting paradigms, the continuous development of skills represents the only effective response to governing change. Investing in the upskilling of human capital means not only fostering the professional growth of each individual but also consolidating a corporate structure of excellence, capable of distinguishing itself through technical expertise and competitiveness within the national digital landscape. Driven by this conviction, the Company invests all necessary resources to identify and define core competencies in order to achieve the goals set by the strategic plan, integrate them into the organisational approach, and activate personalised training pathways.

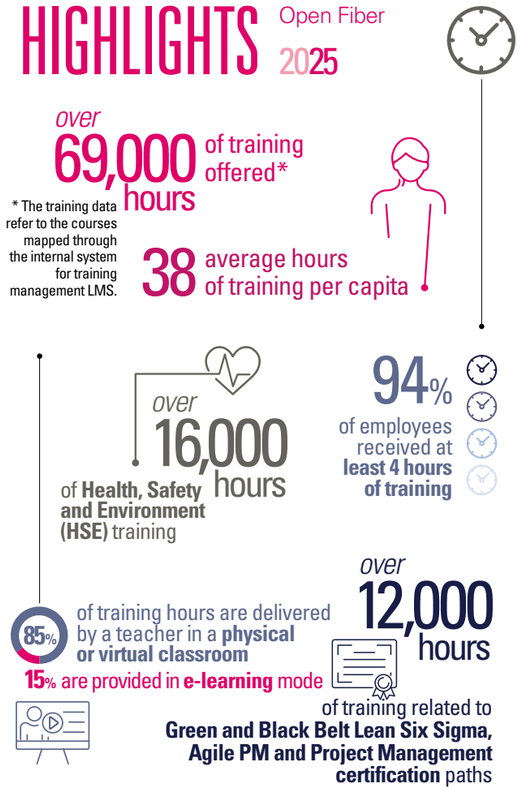
Thanks to a **tailor-made approach**, Open Fiber has designed a training offer centred on individual needs, combining mandatory courses with pathways for the in-depth study and updating of both **soft** and **hard** skills, based on role and corporate seniority. This opportunity is open to everyone, from the Management team to newly hired colleagues, enhancing the potential and professional growth of each individual.

Furthermore, the development of increasingly digital pathways and innovative methodologies has been promoted, providing for both in-person and online participation. In the last year alone, the Company achieved a milestone of over **69,000 training hours**, divided into Company Training (institutional corporate training related to the 231 Model, Code of Ethics, Antitrust, etc.), technical training for network specialists, behavioural, linguistic, and digital training, as well as mandatory training on Occupational Health and Safety (aimed at all workers and those designated in roles such as fire-fighting officers, first aid officers, workers' safety representatives, and supervisors, as well as PES and PAV figures[83] for electrical work) and necessary training (i.e., beyond legislative compliance) on Security and HSE topics, aimed at increasing employee awareness of Information Security, Occupational Health and Safety, and Environmental Protection.

Recognising training and individual growth as primary levers of development, the Company actively promotes the principle of **continuous self-learning**. This vision is actualised by granting every professional full autonomy in their own upskilling journey, providing a portfolio of platforms for dynamic self-study. These tools allow for the customisation of new skill acquisition, transforming individual curiosity into a strategic asset for the entire organisation:

- **LinkedIn Learning:** a cutting-edge training solution that leverages the potential of artificial intelligence to offer over 200,000 constantly updated resources. These are available on-demand to ensure continuous learning seamlessly integrated into daily work routine;
- **OFCourseMe:** driven by artificial intelligence, this platform offers over 200,000 resources aggregated from the best MOOCs (Massive Open Online Courses). It serves as a comprehensive online catalogue of courses, video tutorials, and TED Talks curated from across the web, constantly updated and accessible through the corporate LMS[84];
- **Open English:** personalised programmes to enhance English language proficiency, available to all employees and one family member. These are based on virtual classes, exercises, and in-depth study materials with qualified native-speaking instructors. The programmes adapt to individual needs and are accessible via the corporate LMS 24/7;
- **Open Learning:** a digital learning experience free for all users of the company website, accessible 24/7, and designed to ensure continuous digital education on the main corporate topics;
- **CyberGuru:** a platform available 24/7 designed to develop the skills of the entire corporate workforce on cybersecurity topics. It aims to spread greater awareness regarding the main cyber threats, the best practices to follow, and the benefits of the secure use of company devices.

In order to optimise knowledge of internal procedures, the Company provides a library of **multimedia micro-learning modules (OPDL)**. These agile and high-impact resources are designed to translate corporate processes into training modules for immediate reference, facilitating daily operations through clear and timely dissemination.

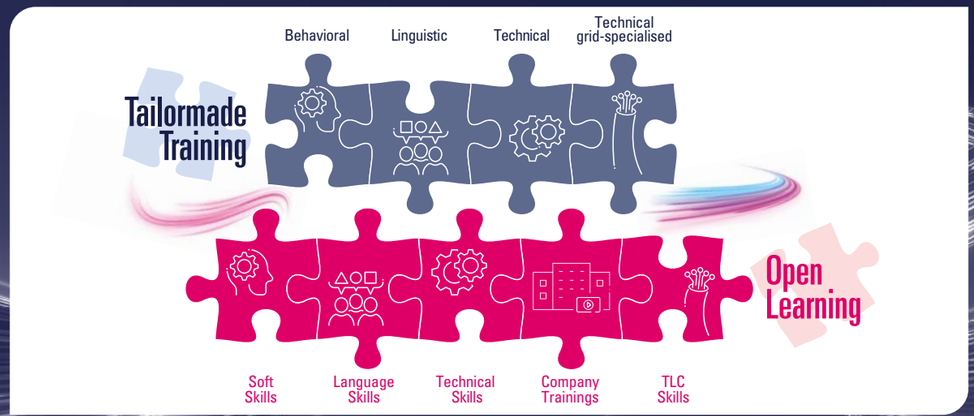




83 Experts (PES) and people informed (PAV).

84 Learning Management System.

FIGURE 18: TRAINING PROVIDED



STAKEHOLDER ENGAGEMENT ON SUSTAINABILITY

The training pathway aims to develop skills for **effective sustainability communication** among corporate personnel responsible for leading and implementing the stakeholder engagement process at various levels. Now in its second edition, the programme involved a total of **52 people** (18 in 2024 and 34 in 2025) and was structured into three modules: **technical skills, soft skills, and practical applications**. Among the practical applications, particular emphasis was placed on testimonials from **sustainability experts** and the **Lego® Serious Play® workshop**. Using a facilitation methodology oriented towards collaborative dialogue, the workshop allowed participants to test what they had learned, express their views on the company's sustainability strategy and communication, and engage in an immersive and reflective manner.







3.2.2 TRAINING TO SUPPORT CONTINUOUS IMPROVEMENT OF PROCESSES

The global scenario of recent years has imparted an unprecedented acceleration to the operating models and digital tools required for daily operations. This dynamism has generated a growing demand for highly specialised technical and transversal skills, highlighting a structural gap between market needs and traditional educational offerings. In this context of profound evolution, Open Fiber considers the systematic development and updating of skills not only as a response to the skills mismatch but as an essential strategic asset to guarantee the robustness and excellence of corporate processes. For this reason, in continuity with previous years, during 2025 the Company involved a significant number of employees in various training pathways aimed at obtaining **Lean Six Sigma Green Belt** and **Lean Six Sigma Black Belt** certifications, in compliance with the ISO 18404:2019 international standard, as well as **Agile PM** and **Project Management** certifications.

Lean Six Sigma courses aim to develop the skills to analyse and improve corporate processes through the use of a "Problem Solving" methodology following the DMAIC (Define, Measure, Analyze, Improve, Control) cycle. This method combines principles and tools from Six Sigma and Lean Production to reduce variability and waste in corporate processes, optimising the use of resources, workspaces, and production cycles, while simultaneously ensuring high quality in production and process management. By the end of 2025, **332 certifications** have been obtained since the launch of these pathways.

The **Agile PM** pathway includes two methodologies: one for Project Management and one for the creation and release of products; essentially, everything necessary to manage the life cycle of projects and their strategic alignment through business cases to be explored in depth to gain awareness of the benefits and added value. By the end of 2025, **184 certifications** have been obtained since the introduction of these pathways.

The training content of the **Project Management** pathway from the Italian Institute of Project Management is consistent with the UNI ISO 21502:2021 guidelines and international reference credential models. The objective of the pathway is to create the skills required to correctly define a project within the scheduled timeframe and budgeted costs, with the desired level of performance and quality, using the assigned resources effectively and efficiently and ensuring the full satisfaction of internal and external customers. By the end of 2025, **271 certifications** have been obtained since the launch of the courses.

DIGITAL HR OPEN FIBER

Dossier Documenti

In Open Fiber, people management is not intended as a mere administrative process, but as a daily commitment to cultivating the satisfaction and well-being of those who work. This vision translates into the desire to simplify the work experience, making management processes more linear and intelligent. For the Company, evolving the **People Experience** means eliminating bureaucratic complexities to make room for talent, identifying operational efficiency and the care of resources as the true critical success factors for the future of the business. With this in view, the Company has continued to perfect the portal, named **Dossier Documenti**, which provides employees with a single interface where they can collect, consult and manage all the documents of their **Employee Life Cycle**, from the application phase to Onboarding, up to the termination of the employment relationship.

The system provides a customized view for each employee and a specific view designed for the People & Sustainability Department. The latter allows for the **centralization and consultation** of all company employee documents from a single point, as well as the performance of **analyses and statistics** according to different information grouping criteria.

Evolution of the Employee Profile

To enhance and simplify the tools available to staff and **improve the People Digital Experience**, Open Fiber, within "**Il Mio Profilo**" (My Profile) of **My Fiber Place** (the company intranet), has introduced a new system called "**ZCarFleet**" to allow employees to book the pool cars provided by the company. Furthermore, it has continued to streamline the "**Dossier Documenti**" (Document File), which enables employees to easily and intuitively consult personal information (My data, Training and Development, My Services...) as well as various sections, including hiring documents, compensation & rewarding, HSE documents, and training certificates.

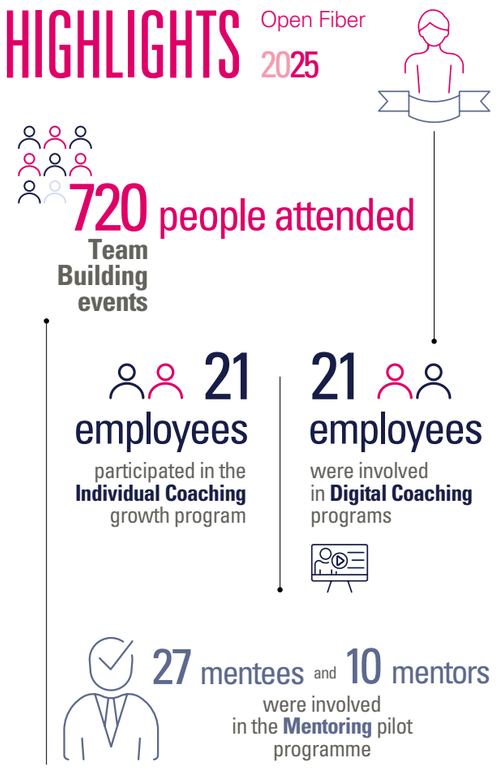
To support planning, promote work-life balance, and facilitate teamwork, a new "**Pianificazione Ferie e Permessi**" (Holidays and Leaves Planning) module has been introduced. This interactive calendar allows for the viewing of colleagues' absences, more efficient planning of one's own, and the guarantee of continuity and balance within the team.

Additionally, Open Fiber has enhanced its Virtual Assistant (Snappy), based on **Generative Artificial Intelligence** technology, by expanding its knowledge base and introducing new services such as ticket opening for IT Support and People Admin.

3.2.3 OF ACADEMY: INTERNAL FACULTY

The continuous challenges of the TLC sector, linked to the development and implementation of new digital and innovative services, require a growing commitment also in terms of professional skills. In this context, **specialist skills** play a strategic role, as they allow the Company to adapt quickly to market changes. During 2023, **Open Fiber** thus launched the **Open Fiber Academy Faculty**, a **center of excellence** aimed at structuring and enhancing internal know-how, which today consists of **60 internal teachers**.

The path of this community includes consolidation activities, sharing of experiences/skills, and co-design meetings with the objective of building a **training offer that is always updated and distinctive** of Open Fiber's core skills. Thanks to the expertise of the Faculty teachers, the community has delivered **over 70 training sessions**. Some of these programmes concern specific corporate roles and/or core processes, involving – where appropriate – external stakeholders as well, such as partners and suppliers.



3.2.4 COACHING, MENTORING, JOB SHADOWING AND TEAM EMPOWERMENT PROGRAMMES

Open Fiber's corporate culture is based on the promotion of a climate of trust and mutual cooperation, in the awareness that excellence in business development is intrinsically linked to the ability to network. The sharing of **know-how** and a continuous learning approach are not mere objectives, but the pillars on which collective success is founded. In this view, support for professional growth is developed through an integrated path that combines traditional training with evolved and personalised tools, such as **Individual and Digital Coaching** projects and continuous awareness initiatives.

TEAM BUILDING

During 2025, the Company organized numerous Team Building events, which were guided by the corporate values of Triple A and Team Spirit, recognising their strategic importance for increasing people's engagement. These initiatives strengthened collaboration, dialogue, and the sense of belonging among the teams. The events fostered a climate of trust and inclusion, contributing to organizational well-being. The continuous investment in Team Building confirms Open Fiber's focus on human capital. This commitment represents a key lever for social sustainability and long-term growth.

Strengthening collaboration and trust within the team, enhancing problem-solving and proactivity skills, change management capabilities, active listening, cohesion, and collective efficiency, are the objectives of a series of **experiences** dedicated to individual corporate Departments/functions.

With a view to enhancing the effectiveness of work teams, whether functional or cross-functional, the Company also implements ad hoc designed **Team Building** activities. These interventions aim to consolidate **team identity** and ensure a vision of business objectives and priorities that is clear and deeply shared. Through these experiences, Open Fiber actively stimulates networking, the fluidity of communication flows and integration among colleagues, transforming internal synergy into a driver of innovation and operational resilience.

The company's **Individual Coaching** program – which involved **21 employees** in 2025 – was designed and promoted to contribute to the growth of coordination roles and develop managerial skills, enabling them to effectively manage their roles, processes, and corporate dynamics.

In 2025, the **Digital Coaching** program also continues – with the participation of **21 employees** – aimed at Key People and delivered through a flexible and customizable digital platform. This activity is intended to support and promote the enhancement and development of skills in alignment with the company's organizational needs.

A tree is planted for each **digital coaching** pathway initiated.

The **Digital and Individual Coaching** paths begin with an introductory meeting dedicated to sharing the objectives of the program. This is followed by a phase defining individual development goals and a series of operational meetings, during which actions functional to achieving them are identified. The program concludes with a phase for verifying and consolidating the learning acquired.

Based on feedback from corporate engagement surveys and the results obtained in 2024, Open Fiber chose to expand **internal mentoring** programmes to support **intergenerational knowledge sharing**. In this view, the **women's mentoring program** launched in 2024, evocatively named "**Arianna**", continued in 2025, with the objective of strengthening confidence and awareness, fostering intergenerational know-how, enhancing networking, and promoting Diversity, Equity & Inclusion principles.

LEADERSHIP PROGRAM

In order to encourage the adoption of the Triple A values (Action, Ambition and Accountability) and Team Spirit, the Company has strengthened its training programmes to support the organisation's managerial figures.
A total of **128 leaders** were involved in an experiential training program in which each dimension of the company values, as well as DE&I, was addressed by alternating theoretical content, action games and moments of comparison/discussion.

The program involved **27 mentees under 30** and **10 female mentors**, selected for their significant professional experience, specific skills, recognized leadership, and high level of engagement towards the Company. The Mentors, in turn, were provided with a specific support path involving one-to-one meetings with a professional coach to acquire the necessary tools to manage their roles effectively and constructively.

In 2024, Open Fiber launched two **Job Shadowing** programmes with the aim of fostering knowledge of the activities of different functions, expanding skills, and strengthening collaboration and the exchange of best practices. The initiative supported the professional growth of participants, improving teamwork dynamics and offering a broader vision of the organizational context.

3.2.5 BEHAVIOUR & PERFORMANCE EVALUATION

Performance Evaluation and 360° Evaluation

Realizing the potential of one's resources means defining clear, shared growth paths in line with the Mission and company values: in 2025, the **Performance Evaluation (PE)** path was revised, the performance evaluation and development process based on Open Fiber's behavioral model, which inspires and guides our way of working.



Redesigned for greater usability, the path today represents a central tool for recognising people's contribution, fostering clarity in evaluation criteria, greater alignment with company values, and a culture of continuous feedback. An approach that supports skill development, performance improvement, and full alignment between individual results and corporate objectives.

The evaluation involved **1,620 people**, evaluated by their managers on performance and behaviors aligned with Ambition, Action, Accountability, and Team Spirit.

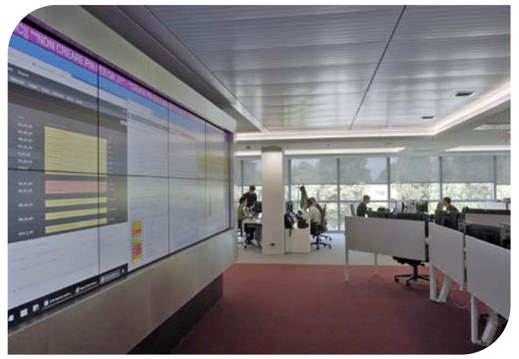
During 2025, the Company renewed its commitment to management excellence through the **360° Evaluation process**, aimed at all the Organisation's managers, intended to monitor and enhance behaviors consistent with the company skills model. Thanks to an evaluation that integrates the perspective of the direct manager, peers, and collaborators with the individual's self-assessment, every Manager has the opportunity to consolidate their **leadership** profile through multidimensional, complete, and constructive feedback.

Development Assessment

As part of Open Fiber's talent management policies, the design and enhancement of various **Individual Development Assessment** paths, differentiated by company population clusters, continued throughout 2025. The primary objective of this program lies in supporting individual growth and accelerating the professional development of resources, ensuring constant alignment between individual aspirations and the evolution of the organisation. Through this tool, the Company is able to precisely map internal potential and identify high-value profiles, structuring solid talent pipelines at every corporate level. The assessment not only allows for the measurement of engagement with Open Fiber's values, but also ensures that each professional's path is functional to the challenges of a constantly transforming market. Over **50 employees** were involved during the course of 2025.

3.3 CORPORATE WELLBEING

Human capital continues to be the driving engine of Open Fiber's success and innovation: a heritage whose value lies in a constant attitude towards learning, agility in adaptation, and a proactive contribution to corporate growth. In this perspective, the Company promotes the development of cutting-edge tools and operating models designed to harmonize professional needs with personal dimensions. This vision is embodied in an advanced approach to work-life integration, guaranteed by a range of Corporate Wellbeing initiatives aimed at placing the individual's well-being at the center of the corporate project.



3.3.1 OPEN WELFARE

The majority of welfare initiatives are channeled through **Open Welfare**, the corporate platform that allows all Open Fiber personnel to benefit from a wide range of goods and services. The platform is designed and implemented with the aim of **supporting a more sustainable work culture** and improving the quality of life of its people. The services offered by the platform mainly concern education, health, family assistance (caregiving), babysitting, supplementary pensions, sports, culture, wellness, travel, transport, and vouchers for groceries and shopping. The year 2025 marked an important milestone: **62% of the Performance Bonus** (Premio di Risultato, PdR) related to the previous year was converted into welfare credit, a figure that shows growth compared to past records. To consolidate this path, the Company signed a new agreement with **trade unions for the bonus** payable in 2026. The agreement not only confirms the possibility of increasing the bonus value upon exceeding corporate targets but also further incentivizes the choice of welfare by providing an additional company contribution of up to **25%** of the converted value. Furthermore, Open Fiber supports the well-being of its people through a portfolio of **corporate agreements**, offering a wide range of benefits and services useful for improving quality of life and strengthening the sense of belonging, based on listening to the needs of its people and in line with the Company's sustainability strategy. An example is the active agreements with major national universities and training institutes for Open Fiber personnel and their first-degree family members, in order to guarantee favorable conditions for access to education.

LISTENING CHANNELS

Open Fiber adopts an approach based on **listening** and active involvement, which are essential elements for understanding the needs, expectations, and priorities of its people in a structured way. Specific listening channels have been activated, including **periodic surveys and thematic focus groups**, which allow corporate initiatives to be oriented in a consistent and effective manner. This approach fosters the creation of an environment where every voice can be valued, gathering useful suggestions and ideas to improve organizational well-being and promote an inclusive and participatory corporate culture.

An example of an active listening channel open to the entire company population is **Eureka**, the platform dedicated to collecting ideas and suggestions regarding the company business. The winning proposals, selected according to the requirements set out in the Regulations, will be implemented during 2026, thus ensuring the concrete impact of employees' ideas on the Company's activities.

Additionally, management interviews with the relevant HR Business Partner and parenting meetings, dedicated to both parents, remain consolidated among the company's listening channels.



3.3.2 PEOPLE CARE

People Care initiatives represent the organisation's commitment to promoting the well-being, development, and inclusion of its people, recognising them as the fundamental engine for sustainable growth and the creation of shared value.

The following initiatives were implemented in 2025:

- **Oktoberfiber & Ape 'n Fiber**: networking opportunities among colleagues after working hours, extended to the main company offices;
- **Buono due Volte**: an initiative allowing people at the Rome office to purchase canteen surplus at a discounted price, with a "no food waste" perspective;
- **Open Breakfast**: free breakfast provided once a week for a limited period to all personnel at all company offices;
- **Healthy corners**: located in the main company offices to offer seasonal fruit with a view to well-being, in continuity with last year;
- **Talenti Project**: an initiative involving all Open Fiber people on a voluntary basis to share their passions and skills with the entire corporate community. In 2025, 11 initiatives were organized, giving space to many different passions;
- **Open day Factory**: guided tours of the Open Fiber Factory, the place where work is done every day to transform ideas into innovative business solutions;
- **Open Stories - People who inspire**: an informal and authentic space on the corporate Intranet to share experiences and successes with the entire company community;
- **Open Fiber Workout Outdoor**: outdoor training sessions led by a professional trainer, with disciplines selected based on the results of an internal survey.

3.3.3 EMPLOYEE ENGAGEMENT

In terms of employee engagement, several initiatives have been launched aimed at proactively involving people in strategic and business issues. The "**Open Fiber Roadshow 2025**" event represented the start of this journey, with two days dedicated to Open Fiber people who operate in and for the local areas. The initiative fostered networking and the sharing of corporate objectives, promoting dialogue, discussion, and strengthening the sense of belonging to the organisation.

During 2025, over 70 Managers from all Open Fiber corporate departments participated in the "**Don't stop!**" event, a forum for discussion and knowledge sharing during which the results achieved in the first half of the year were highlighted and future objectives were shared.

Finally, the **Champions Field Manager** initiative continued. This is a corporate competition dedicated to Open Fiber Field Managers, aimed at achieving business objectives based on the main operational KPIs of Delivery. Through a playful approach that combines a sense of duty with a strong Team Spirit, the initiative – which saw high participation and was greatly appreciated – represents a concrete example of how **Ambition, Action, and Accountability** guide our daily operations.

MY FIBER PLACE

The **My Fiber Place** corporate intranet continues to be the primary point of access for all company information and communications. The portal, integrated with corporate software, is essential for employee engagement and for improving the employee experience, thus becoming an effective work tool. Additionally, **My Fiber Place** hosts thematic sections aimed at constantly updating employees on the evolution of strategic topics for the Company, including those dedicated to the status of the FTTH ultra-broadband **fiber** optic network infrastructure implementation across all Italian regions and the customers reached, sustainability, safety and diversity, equity, and inclusion (DE&I).





3.3.4 WELLNESS & WELLBEING

Open Fiber considers the promotion of the company population's well-being to be a fundamental value. Through excellent supplementary health insurance coverage – extended also to cohabiting partners, civil partners and children – and targeted screening and prevention programmes, it puts the person at the center, guaranteeing every collaborator access to timely care pathways and constant monitoring tools.

In this regard, as in previous years, the Company launched two **prevention campaigns** in October and November 2025, recognized respectively as women's and men's health months, inviting the company population to take advantage of the free check-up package included in their health insurance at one of the affiliated facilities.

The Company also continues to promote physical well-being through the **Wellhub platform** which offers, at discounted rates, access to an extensive network of **gyms and sports centers** throughout the national territory, lessons with **personal trainers**, **sports coaching**, as well as digital solutions dedicated to **nutrition**.

In addition to physical well-being, in 2025 Open Fiber also reinforced its caring culture through the **EAP** (Employee Assistance Program) service, a personalized psychological, legal, fiscal and social assistance support program provided free of charge and anonymously to the entire company population.

3.3.5 FAMILY CARE

Open Fiber's welfare model also includes Family Care, understood as a set of concrete solutions to support parenting and family life, designed to foster the **balance between private life and work.** Through dedicated work-life integration projects, the

BACK TO SCHOOL

The **Back to School** program continues. The initiative provides:

- to employees having children attending **nursery and pre-school**, a permit to be used on an hourly basis for a maximum of 24 hours;
- to employees having children attending from **first grade to ninth grade**, for the first day of school, a paid permit to be used in a scheduled time slot.



PARENTING KIT

As part of the activities promoted to support families, on the occasion of the birth and/or adoption of a child, Open Fiber sends new parents a "parenting kit" accompanied by a message of congratulations for the happy event.



OPEN KIDSMAS DAY

On the occasion of the holidays, Open Fiber offices hosted the **Open Kidsmas Day 2025**, an event dedicated to the sons and daughters of employees, during which shows and entertainment activities were organized, involving over 500 children.



Company is committed to promoting an environment that welcomes and values the different stages of family life, in the belief that supporting people in their private dimension means enabling them to best express their professional potential.

To support new mothers and fathers, Open Fiber has created a **dedicated communication channel**, "genitorialita@openfiber.it", through which it is possible to schedule a **parenting interview** aimed at providing all information regarding the relevant administrative requirements. The initiatives adopted in favor of parenting also apply in cases of **adoption and foster care**.

Furthermore, the Company provides a New Mothers Bonus, an **economic bonus** – credited in the payslip – to working mothers who have returned from maternity leave during the year (see par. 3.4.2).

In line with its support for parenting, in 2025 Open Fiber became a founding member of the "**Cresciamo il Futuro**" Foundation, a joint initiative of some of the leading Italian corporate entities. The goal is to support parenting and birth rates through the creation of the **first national network of widespread corporate nurseries and services dedicated to childhood**. Open Fiber thus strengthens its commitment to fostering the work-life balance of parents and promoting the growth and well-being of children.

The project supports a shared welfare model made possible also thanks to collaboration with Institutions, particularly with the **Ministry of Labour and Social Policies** and the **Ministry of Family, Natality and Equal Opportunities**, which puts people and their well-being at the center, supporting families during one of the most delicate and significant phases of life.

This is accompanied by Open Fiber's support for the 5th edition of the "**Stati Generali della Natalità**", of which the Company was a sponsor. Through dialogue with institutions, businesses, and civil society, Open Fiber thus contributes to building an ecosystem favorable to birth rates and the balance between professional and private life.



Furthermore, to continue fostering real work-life integration, the adopted remote working model confirmed supplementary protections for pregnant women, for new parents in the period following birth, adoption, and foster care, and for people experiencing situations of particular vulnerability. In these cases, **additional smart working days** beyond the ordinary entitlement are granted, named "Fiber Working Maternità," usable before compulsory maternity leave, and "Fiber Working Genitorialità," usable within the first year of the child's life. In the case of people experiencing situations of particular vulnerability, the applicable justification is "Fiber Working casi particolari."

Still with a view to supporting **parenthood**, the **Second-Level Agreement** confirms:

- an increase in parental leave **allowances**, including the achievement of an allowance equal to **100%** for a maximum duration of one month, for one of the two parents alternating between them, up to the child's sixth year of life through a **20% integration** by Open Fiber;
- an **increase in the time limit for parental leave**, in order to allow the use of the three months (two months, in the event that the first month is used at 100%) of parental leave paid at 80%, until the **child reaches the age of 12**, as an integration of the current legislation, which currently sets the usage limit at the **sixth year**;
- the recognition of an **additional five paid days** of paternity leave for the birth, adoption, and pre-adoptive foster care of a child, to be used even non-consecutively, within the child's first year of life. Regarding the child's illness, an additional **five paid days per year** have been recognized, which can also be used on an hourly basis, until the child reaches the age of 14;
- the payment of a **one-off amount** to employees should they enroll their tax-dependent children in the TLC - Telemaco supplementary pension fund within the child's first three years of life.

The 2025 initiatives also include agreements with trade unions aimed at facilitating the planning and **use of holidays and permits** for 2025.

3.3.6 A WORKING ENVIRONMENT TAILORED TO THE PERSON'S NEEDS, AT THE OFFICE AND AT HOME

Open Fiber believes that its **Smart Working model**, defined in 2023 with trade unions, has now become an integral and essential part of its corporate culture, offering the possibility to alternate between office work and remote work for a total of **21 days every two months**.

The potential of Open Fiber lies precisely in this: leveraging its own network and technologies to support a flexible approach to work, through a project called **Fiber Working**.

In addition, to improve and make Fiber Working

more comfortable, the **DTTH 2.0 (Dotazioni To The Home) project** was confirmed again for this year, involving the delivery of ergonomic and IT equipment to employees' homes.

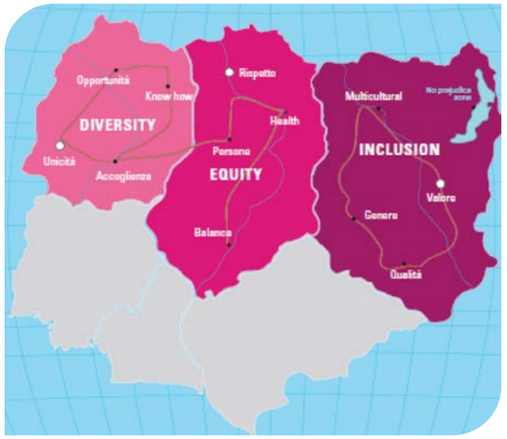
3.3.7 NEW TICKETING PLATFORM FOR THE EMPLOYEES

In order to improve the digital experience of its employees and encourage the exchange of information, in 2023 Open Fiber began updating a **ticketing platform** for the management of requests addressed to personnel administration. The tool allows for the simplification of processes, reduces response times and guarantees maximum transparency in each phase of the request resolution, contributing to a more efficient and inclusive organisation.

3.4 DIVERSITY, EQUITY & INCLUSION

Diversity, Equity and Inclusion are true **strategic drivers**: guiding principles that do not merely inspire policies but actively orient daily actions. Because a network is only as strong as the diversity of the voices that compose it. For this reason, the Company's commitment translates into concrete actions in favor of gender equality, female empowerment, support for parenthood and the constant enhancement of multiculturalism, disability and the inclusion of those from disadvantaged backgrounds, transforming every uniqueness into a connection of value.

Recognising the uniqueness of each individual as a source of value, capable of enriching the organisation and stimulating innovation through diverse perspectives, skills and experiences, 'Unici nel Connettere' was created – Open Fiber's corporate program of DE&I initiatives. The project addresses key themes such as gender equality, maternity and family care, social inclusion, support for workers in disadvantaged areas, multiculturalism and attention to disabilities, in full alignment with the company's strategy and values.



3.4.1 PARTNERSHIP AND COLLABORATIONS

In this context, Open Fiber collaborates with specialized associations: **Fondazione Libellula**, committed to promoting a culture against violence against women and gender discrimination – in 2025, two thematic webinars were provided to the entire corporate population; **Valore D**, an organisation that promotes gender balance and an inclusive culture through training courses, events, and industry studies; **Raggio di Luce**, a social cooperative that fosters the job placement of people with disabilities, through the launch of the corporate concierge service at the Rome office; **Cervelli Ribelli**, an association that promotes the inclusion of neurodivergent people by offering educational, social, and job placement pathways, and with **Includere per Crescere** (see par. 3.4.3 and 3.4.4).

In parallel, the **Open Fiber Ambassadors** training program daily supports respect, equity, and inclusion, promoting the empowerment of women and preventing any form of discrimination. These professionals are trained to create a safe work environment where everyone feels welcomed and heard.

3.4.2 SOCIAL AND PROFESSIONAL INCLUSION

Among the initiatives aimed at fostering social and professional inclusion, Open Fiber joined a professional retraining program promoted by the



Ministries of Justice and of Technological Innovation and Digital Transition, aimed at the professional reintegration of prison inmates. The **Prison Work Program** began with a pilot project in the Rebibbia prison, where inmates – after a theoretical-practical training course – were employed by the **Open Fiber Network Solutions Consortium (OFNS)** to carry out **fiber** optic cabling activities. The training activity was subsequently replicated in the prisons of Bollate and Vigevano where, upon completion of the training, inmates were involved in back-office activities. Furthermore, the **OPEN Project** was

DIVERSITY, EQUITY & INCLUSION POLICY

The Diversity, Equity & Inclusion Policy is a declaration of the company's ongoing commitment to promoting and upholding the principles of diversity, equity and inclusion. Guided by these values, Open Fiber operates impartially and does not tolerate any form of discrimination, favouring diversity in all its dimensions and promoting it as a competitive advantage for the Company. With the DE&I Policy, Open Fiber is committed to:

- **spread a culture of diversity and equal opportunities** both within the company population and among stakeholders, ensuring that it is shared by all, not only by encouraging inclusive behaviour, but also by adopting, where necessary, tools aimed at sanctioning contrary behaviour;
- **raise staff awareness of the culture of diversity** and ensure that each individual is aware of their responsibilities in terms of respecting and defending the rights of people, whether they are inside or outside the Company;
- **promote an inclusive** work environment, in which each individual feels valued and free from any discrimination and/or behaviour that is detrimental to diversity - whether it be: gender, age, disability, ethnic, social and geographical origin, union membership, language, religion, political and/or sexual orientation, gender identity, nationality, marital status, state of health - during the selection, hiring, training, remuneration, awarding of bonuses, access to benefits and termination of the employment relationship.

CERTIFICATION OF GENDER EQUALITY

In 2025, the Company confirmed, for the third time in a row, the certification of the **management system for gender equality** according to UNI/PdR 125:2022. Open Fiber has worked on strengthening and implementing a gender equality management system in accordance with the reference standard (UNI/PdR 125:2022), introduced as part of the **National Recovery and Resilience Plan (NRRP)**[85] with the specific intent of supporting and encouraging companies to adopt adequate policies to reduce the gender gap in all areas that are most crucial for the professional growth of women. The certification confirms the company's constant commitment to equal opportunities, in line with the objectives of the NRRP, which aims to promote greater inclusion of women in the labour market, considering this to be an **essential tool** for improving social and territorial cohesion, as well as being of fundamental importance for the country's economic growth.

OPEN FIBER AT THE "SALONE DELLA CSR E DELL'INNOVAZIONE SOCIALE"

2025 marked Open Fiber's **second year** at the "**Salone della CSR e dell'Innovazione Sociale**", the most important event in Italy dedicated to sustainability. A point of pride for the Company, which took part in its 13th edition entitled "Creare futuri di valore" (Creating futures of value), involving over 500 speakers and 260 organizations, and recording 6,000 attendees over three days across approximately 120 events.

Within the setting of the **Bocconi University in Milan**, Fabrizia Russo, Head of Sustainability, DE&I, Internal Communication & Welfare at Open Fiber, spoke on the panel "**Re-educating and reintegrating: creating value beyond prison**," illustrating the situation of prisons in Italy and the importance of inmate training to effectively fulfill the re-educational mission and guarantee socio-professional reintegration following detention measures.

In this regard, the **virtuous experiences** piloted by Open Fiber and OFNS were cited, including the pilot project in the Roman prison of Rebibbia and those in Bollate, Vigevano, and Velletri.

launched in the Velletri prison, at the end of which, following high-level training, a former inmate joined OFNS and was integrated into construction site activities.

Additionally, in 2025, an **international mobilization project** was launched that allowed OFNS to train a group of workers from the Philippines as cable layers and excavators.

In continuity with the initiatives already launched, the **New Mothers Bonus** was proposed again in 2025 – an economic bonus for all female professionals returning from maternity leave to provide them with concrete support by facilitating their return to work – while the **collections related to DE&I topics** in the training field, in DL[86] mode on **internal** platforms, remain an important pillar.

3.4.3 GENDER EQUALITY & WOMEN SAFEGUARD

Gender equality is a fundamental principle for Open Fiber, so much so that the Company has structured a framework of protections and opportunities that guarantees women not only access, but real and sustained growth within the organisation. From the recruitment phase to leadership, various measures have been implemented to facilitate **professional inclusion** and actively counter the gender gap.

3.4.4 DISADVANTAGED AREAS & WORKERS SUPPORT

Open Fiber strives daily to guarantee **equal opportunities for growth and training** to every individual, without distinction. Through active collaboration with organizations in disadvantaged neighborhoods and programmes dedicated to the professional integration of vulnerable categories, it thus transforms inclusion into a concrete commitment.

3.4.5 MULTICULTURALISM

In an increasingly global and diverse work environment, valuing and managing cultural diversity is fundamental.

PROJECTS FOR EQUALITY AND INCLUSION

Quotas for women in technical professions

The enhancement of Diversity, Equity & Inclusion topics since the personnel recruitment phase has been a constant element in Open Fiber's vision. In this way, it guarantees an equal *pipeline* of male/female candidates.

Open Fiber's first female jointers

Within the Fiber Optic Academy, Open Fiber and OFNS, in collaboration with ELIS, continue their commitment to promoting professional training and developing strategic technical skills for the construction and management of future networks, enhancing the inclusion of female talent. In this context, two female professionals are undergoing a training path to join the OFNS Delivery team as jointers, actively contributing to the development of an innovative and sustainable project.

Open Fiber's "Maestre di Mestiere" for the FTTS project: Fiber To The School

Within the PCTO project "FTTS: Fiber To The School," Open Fiber's *Maestre di Mestiere* (Masters of the Trade) represent a concrete example of inclusion and the valorization of female skills in technical roles. As qualified professionals in the telecommunications field, they make a decisive contribution to reducing the gender gap in STEM pathways, offering female students real career models in a sector still characterized today by limited female presence. Through training activities, practical demonstrations, and direct discussion sessions, the *Maestre di Mestiere* transfer specialized skills and foster greater awareness of professional opportunities related to digital infrastructures. Their involvement represents a strategic element of the company's vision of sustainability: promoting equal opportunities, increasing female representation in technological professions, and contributing to the construction of a more equitable, inclusive, and future-oriented working ecosystem.

Mentoring

The inclusion of women in senior roles as mentors for the **Arianna Open Mentoring** project represents a key element for the success of this pathway. Their experience and leadership offer concrete models for growth and inclusion, fostering a more equitable and conscious corporate culture. Female mentoring strengthens internal talent and reduces opportunity gaps, creating a solid network among people of different ages, backgrounds, and experiences.

Includere per Crescere

The **Includere per Crescere** program also continues in 2025. A schedule of initiatives within the organisation in the areas of recruitment, training, welfare, DE&I to **generate and promote the direct labour inclusion of disadvantaged persons** but also indirectly, i.e. through the supply network. This programme aims to integrate people with previous professional experience into companies who are currently excluded from the world of work due to a need or a fragility. Finally, the project supports the development of **"impact" companies**, which stand out for the quality of the products or services offered, their organisational solidity and their ability to generate social impact.

This Unique

In 2025, the distribution campaign of **feminine sanitary pads** at Open Fiber offices continues, with the aim of guaranteeing the supply of an essential good and breaking down gender barriers in the workplace.

HIRING DISADVANTAGED PEOPLE

Open Fiber pays particular attention to the hiring of professionals, both junior and senior, belonging to disadvantaged categories of workers (unemployed, underemployed, workers with fixed-term contracts, etc.). In this perspective, in 2025 as well, the Company carried forward several collaborations, including, ***"Cervelli ribelli"*** **(Rebel brains)**, a non-profit foundation that has seen the inclusion of a neurodivergent person in an internship, and ***"Includere per Crescere"*** **(Including in order to grow)**, a programme of initiatives in the field of recruitment, training, welfare, DE&I to generate and promote the direct labour inclusion of disadvantaged individuals in the corporate world, but also indirectly, i.e. through the supply network.

85 Mission 5 "Inclusion and Cohesion", Component 1 "Active labour policies and employment support".

86 Distance Learning.

Integrating different perspectives, experiences, cultures and backgrounds not only favours a more inclusive and stimulating work environment, but also represents a competitive advantage, capable of generating innovation, improving collaboration and the ability to adapt to the dynamics of a constantly evolving market. Confirming this commitment, Open Fiber boasts a heterogeneous human capital, with employees coming from over 160 companies and representing 26 different nationalities.

3.4.6 DISABILITY CONFIDENCE

Open Fiber pays particular attention to disability and demonstrates this not only by removing all types of environmental and architectural barriers, but also by adopting an **approach aimed at enhancing diversity**, considering it an added value capable of structuring an organisational process that can support each colleague in achieving their professional goals.

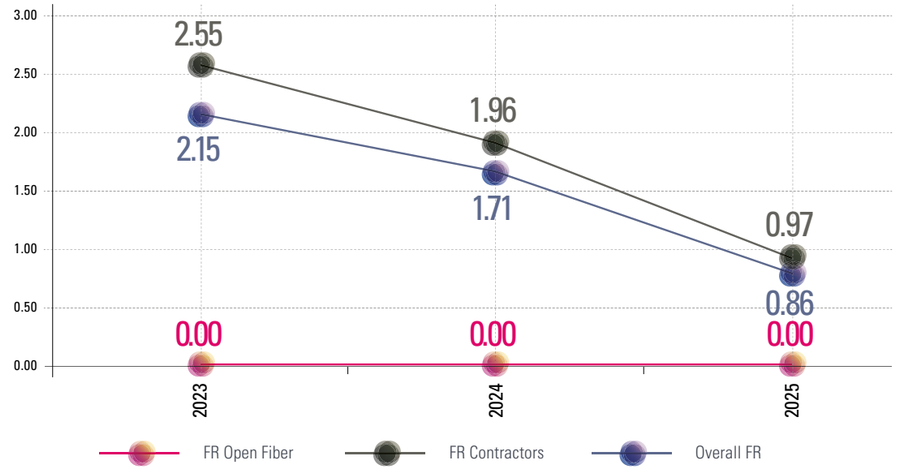
OPEN LEARNING

For Open Fiber, innovation is a central element of its mission and business, as well as one of the fundamental pillars of today's digital society. Therefore, on the **Open Learning** digital platform, access to training pills has been ensured even for the hearing impaired, thanks to the inclusion of subtitles.

ACCESSIWAY

In order to make the company website more accessible to people with disabilities, Open Fiber has implemented a management panel on its web platform that is very intuitive thanks to **Artificial Intelligence and Accessibility Interface**[87] components.

FIGURE 20: TREND OF WORK-RELATED INJURIES FREQUENCY RATES (FR) - OPEN FIBER



3.5 HUMAN CAPITAL PROTECTION

For Open Fiber, the protection of human capital is an essential requirement in every activity. Health and safety do not only concern direct employees but involve the entire supply chain operating on behalf of the Organisation. From administrative offices to technological sites and Creation, Delivery, and Assurance operations, the Company works constantly to reduce risks and promote a culture of prevention. To this end, rigorous protocols are created and implemented to ensure that every intervention on the network is, first and foremost, a safe intervention, protecting the integrity of all people involved.

Open Fiber has identified and assessed the risks associated with corporate activities and the workplaces where they are carried out, in full compliance with current legislation, identifying the best solutions to reduce risks and adopting the most appropriate prevention and protection measures. Risk identification takes place through field inspections, interviews with company personnel, and instrumental surveys, always ensuring consultation with Workers' Safety Representatives (*Rappresentanti dei Lavoratori per la Sicurezza, RLS*) and the participation of the coordinating competent physician and the coordinated competent physicians.

A role of fundamental importance is the occupational medicine service which, through health surveillance, monitors the status of workers, taking into account occupational risk factors related to the work environment and the activities performed within it.

The management of Occupational Health and Safety involves all levels of the corporate organisation, from the CEO, in the capacity of employer, to the employees, including through their respective representatives, ensuring joint analysis and discussion between the parties involved. Relations with the RLS are managed and maintained by the HR Business Partner, Organisation, Industrial Relations & Digital HROF function of the People & Sustainability Department which, with the support of the Prevention and Protection Service (SPP), organizes periodic meetings to share issues related to Health and Safety for Open Fiber employees (for example, meetings pursuant to art. 35 of Legislative Decree 81/08).

Open Fiber's **Integrated Management System**, certified for the Occupational Health and Safety component according to the **UNI ISO 45001** standard, is an important tool for the continuous improvement of corporate performance, ensuring the highest standards, as well as full compliance with current legislation and agreements made with employees and their representatives. The system covers Open Fiber's entire workforce across all company locations and applies to all activities performed by third-party companies with which the Company has entered into procurement contracts for network construction and management activities[88]. During 2025, the Company took a significant step in strengthening its policies to protect workers' health and safety by achieving certification according to the **ISO 39001** scheme. This standard, specifically dedicated to road safety management, represents an important recognition of the system adopted by the company to prevent risks related to vehicle traffic and to ensure the protection of all workers involved in operational activities.

3.5.1 PERFORMANCE MONITORING

Among the most significant indicators monitored by Open Fiber is the trend of injury performance, linked not only to its own employees but also to the contractors and subcontractors operating within the Creation, Delivery, and Assurance activities. The analysis of injury rates allows for the monitoring of performance over time, identifying any abnormal trends and related causes, areas of weakness, and focus points where corrective and improvement actions should be concentrated, while evaluating their effectiveness.

87 For more details, see paragraph 1.3.2 "Transparency and communication for citizens, businesses, and Public Administration."

88 For more details, see paragraph 6.3 "Quality, Occupational Health and Safety and Environment Management". Furthermore, with reference to the Open Fiber Network Solutions Consortium, see paragraph 1.6.4 "Certifications and performance improvement".

Examining the processes and interventions planned for the construction and maintenance of the fiber optic infrastructure, Open Fiber has identified the main risks that can lead to serious injuries for the workers involved: being struck by vehicles (activities are carried out on roadways or at the side of or very close to roadways and traffic areas in urban and extra-urban contexts); crushing of limbs, as well as bumps or impacts (among the highest risks is the opening and closing of manhole covers generally made of cast iron and with "wedge-shaped" opening); electrical risk (in particular for some underground or aerial laying activities that may take place near electrical cables); risk of falling from heights (frequently the work involves laying cables on poles and/or on building facades in both urban and extra-urban contexts); slipping (following various ground conditions and/or distractions of the operators themselves).

Given the multiplicity of situations, Open Fiber has defined a procedure for the analysis of accidents and injuries at work occurring within the activities carried out by Company personnel or interventions subject to a contract for works or services between Open Fiber and contractors and subcontractors, including contracts with self-employed workers and consultants. Based on the severity of the accident occurred (green, yellow or red code), a specific analysis process is activated which, in the most serious cases (accidents defined as HIPO – High Potential – i.e. an event that has the potential to cause or that has caused a fatal injury or with permanent consequences) provides for the establishment of a multi-functional Investigation Group, coordinated by the QHSE Representative.

The process identifies the **immediate causes** that determined the accident (for example technical causes) and the **base causes** (so-called root causes); downstream, **corrective and improvement** actions are defined. The effectiveness of the actions put in place is verified through a subsequent follow-up. The information collected during the investigation is treated in strict compliance with the Privacy Code adopted by Open Fiber[89].

Even more systematically, during 2025, the Organisation monitored "near miss" episodes both for Open Fiber employees and for the personnel of contracting companies in the Creation, Delivery, and Assurance sectors: for Open Fiber personnel, most of the reports refer to areas and systems within company premises, while for contractors, near misses were recorded mainly related to incorrect management of the construction site and signage (approximately 23%), failure to comply with safety procedures and measures (approximately 32%), and unsafe conditions (approximately 26%).

3.5.2 IMPACT MITIGATION

The activities carried out by Open Fiber in the context of the creation, management and maintenance of the ultra-broadband network, if not correctly managed and planned, can negatively impact the Health and Safety of people, exposing the personnel involved to potential accidents. Such circumstances may expose the Company to criminal or civil liability against those responsible and, in some cases, of violation also pursuant to Legislative Decree No. 231/2001, with consequent additional costs for the Company and damage to its image and reputation.

The phases of implementation, management and maintenance of the network - which mainly involves external personnel - are subject to normal risks related to the typical activities of the sector (for example: excavations, use of equipment and work vehicles, opening of manhole covers and underground equipment works and to risks connected to external third-party interferences (for example: vehicular and pedestrian traffic, the presence of utility infrastructure (gas, water and electricity networks) or environmental and climatic (for example: ordinary and extraordinary climatic events, natural disasters). Risks can derive mainly from incorrect execution of work phases and the improper use of equipment and work vehicles. To address this, Open Fiber

89 For further details, see paragraph 6.2.3 "Privacy protection".



has activated a Management System, compliance with which is explicitly required in the general and special contract conditions along with the relevant legal obligations. To ensure compliance with current regulations and internal procedures, the contract provides for a series of penalties to be applied in the event of non-compliance. The attention dedicated to contractors and other suppliers who collaborate daily with Open Fiber covers all phases of execution of the existing contract:

- initial phase: Open Fiber holds briefings with contracted service providers in order to share and analyse the main critical issues identified in the work, with a view to preventing the main risks and sharing the Management System documents;
- contract implementation: Open Fiber promotes periodic meetings with service and works contractors, during which it shares the results of the site inspections and the analysis of data generated by corporate monitoring systems used to improve performance. These results are also sent to contractors on a monthly basis via automatic emails generated by the Business Intelligence platform developed by Open Fiber.

Furthermore, in order to guarantee a widespread presence throughout the territory and that adequate checks are carried out to ensure compliance with current regulations regarding tenders, Open Fiber publishes specific calls for tenders for services, including safety coordination. Within the calls for tenders, in addition to the minimum requirements provided for by law, further more stringent requirements are detailed which result in rewarding technical scores with the aim of selecting the most suitable profiles. In 2025, with a view to further improving the surveillance and control process, the execution of quarterly control assessments on the performance of service providers continued through the processing and monitoring of a series of Key Performance Indicators (KPIs) relating to contractual fulfillments, through which the Vendor Rating Index is calculated.

With regard to the risks associated with the Health and Safety of its workers, in addition to continue providing mandatory training on the subject of Occupational Health and Safety for all newly hired personnel, with a specific focus on the importance of the cultural approach to these issues, Open Fiber continued and implemented a series of related initiatives during 2025, including:

- The **2025 HSE Plan**, conceived as an evolution of the C.A.R.E. Program developed in previous years, aims to pursue two main objectives: the prevention and reduction of accidents (injuries and occupational diseases) and the minimization of environmental impacts (damage to underground utilities and environmental matrices: water, air, soil). Structured around 4 pillars (**Support, Monitoring, Engagement, Awareness**), the HSE Plan aims to develop and mature a sense of responsibility at all levels, enhance the involvement of employees and suppliers, increase the safety culture, and promote extensive communication towards all internal and external stakeholders.
  - the adoption of a training path addressed to all personnel, exceeding regulatory requirements and consistent with specific work activities. The contents are considered essential, with focuses dedicated to **on-field personnel** and **Operational Support** personnel in the territory. Among the most relevant initiatives are: in-depth sessions on Health and Safety management at construction sites and on the management of significant environmental aspects related to network construction and maintenance activities;
  - the "My QHSE & SPP" corporate portal, the core for disseminating the culture of quality, safety, and environment, structured into a series of sections (regulatory, educational, multimedia, reserved area, useful links) and a point of reference for Occupational Health and Safety topics available to all Open Fiber personnel;
  - information on general corporate risks and behaviors to be adopted in case of emergency, on the use of personal protective equipment, and for work activities carried out under Smart Working arrangements;
  - information on risks and behaviors during visits to Open Fiber construction sites and technological sites;
  - introductory video on corporate risks and behaviors to be maintained in case of emergency shared in the virtual classroom during Onboarding sessions for all new hires;
  - activation of the "Safety onfield" project, which involved part of the OF and OFNS personnel (both operational and technical-administrative) in workshops dedicated to: travel with company vehicles, technological sites, and construction sites. Following these meetings, communication and awareness activities aimed at all personnel and major contractors will be implemented.

2025 HSE PLAN

The 2025 HSE Plan represents a strategic compass for Open Fiber to systematically promote the culture of health, safety and environmental protection. The program is developed across four pillars (Support, Monitoring, Engagement, Awareness), for each of which several initiatives were developed during 2025, including:

Support

- Workshops: meetings with contracting companies whose HSE performance needs improvement, aimed at raising awareness on safety issues and analyzing areas for intervention.
- Field inspections: Quarterly days at the construction sites of companies with room for improvement in HSE, to meet personnel and promote HSE best practices.
- Best In Class: updating and maintenance of the app dedicated to employees to encourage engagement and the reporting of Near Misses.

Monitoring

- Third-party audits: verification for the maintenance of ISO 9001, 14001, and 45001 certifications.
- 96 internal QHSE audits: inspection of offices, sites, construction sites, and processes, planned throughout the year.
- Field interviews: 30 interviews with personnel to assess the effectiveness of HSE actions and collect suggestions.
- Operational Controls: +15% HSE field inspections compared to the 2023 target.

Engagement

- Periodic HSE meetings: 10 specialized roundtables with HSE representatives from major network suppliers to encourage dialogue.
- HSEQ meetings: meetings with Area HSEQ figures regarding critical issues and key topics.
- "Safety OnField" Contest: involvement of personnel on health and safety topics.
- Pre-Job Check: mandatory preliminary verification of activities by the contracting companies.

Awareness

- 4 HSE pills: informative materials for personnel regarding accidents and near misses, communication, and safety.
- PPE Campaign: promotion of the correct use of Personal Protective Equipment within the companies.
- HSE virtual training: a course dedicated to HSE area personnel.
- Online safe driving course: remote training for specific teams.
- Operational training: a pathway on operational Quality & HSE and the role of the Safety Coordinator, dedicated to personnel in the HSE family.
- ISO 39001 Certification: adaptation of the management system and achievement of the road safety certification.











Value for the community

04. IMPACTS ON THE TERRITORY

4.1 ITALIAN AND EUROPEAN DIGITAL SCENARIO

More than thirty years after its birth, the internet has evolved from a communication network into a global infrastructure that is indispensable for the economy, culture, and scientific progress. This transformation has fueled a growing demand for ultra-fast connectivity, reaching a turning point with the 2016 "**Fiber Decree"** (*Decreto Fibra*)[90] which recognised the necessity of accessing high-speed communication networks as a priority. Today, the regulatory framework guarantees every operator "the right to offer access to its physical infrastructure for the purpose of installing elements of high-speed electronic communication networks", in full compliance with the principles of transparency, fairness, and non-discrimination.

While the network has broken down geographical barriers, promoting inclusivity and connection between people and institutions, its exponential growth also imposes rigorous management of crucial challenges such as safety and privacy. Addressing these issues is now a priority to ensure a digital experience that is both ethical and sustainable.

Today, web access is considered a **universal human right**, according to the vision of its inventor, Tim Berners-Lee. This position has been fully embraced by the United Nations Human Rights Council, which has defined the internet connection as "one of the fundamental human rights in the modern era"[91]. From this perspective, the network has established itself as a true virtual public square: an essential space for social interaction, economic exchange, and constant dialogue with institutions, healthcare, and the education system.

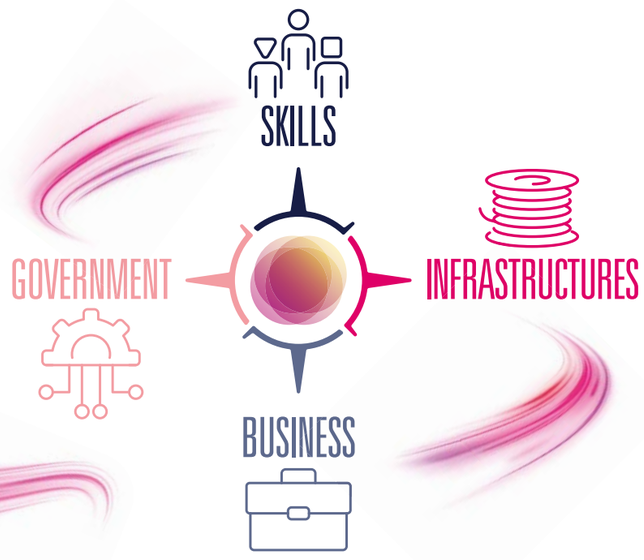
Conversely, digital exclusion now translates into a limitation of individual freedoms and socio-economic opportunities. Although the connected population has reached 5 billion (compared to 3 billion in 2021)[93], approximately 2.7 billion people still remain on the fringes of the network. This gap makes achieving global connectivity by 2030 – a target set by the ITU (International Telecommunication Union) within the UN Agenda for Sustainable Development – a complex challenge. The digital divide spares neither Europe nor Italy: overcoming it requires widespread infrastructure, digital literacy programmes, and inclusive policies. Transforming the digital realm into a tool for empowerment, rather than exclusion, is only possible through a synergistic commitment between institutions, businesses, and civil society. The roots of the digital divide lie in the lack of infrastructure, the unavailability of devices, and a deficit in basic skills (cultural divide). In this scenario, Open Fiber is committed to expanding network access in line with the European Commission's "**Digital Compass**". This strategy is integrated with the twin ecological and digital transitions promoted by the European Green Deal, which paves the way for strategic programmes such as **NextGenerationEU**. With a budget of over €800 billion, this plan aims to support economic and social recovery, transforming connectivity into the driving force for overcoming the fragilities that emerged during the pandemic.

In the **National Recovery and Resilience Plan (NRRP)**, Italy has allocated 21% of funds to digital transition and innovation in response to the first mission, "Digitalisation, innovation, competitiveness, culture and tourism", through reforms and strategic investments aimed at boosting the digital transformation of the Public Administration and the judicial system, strengthening the healthcare system, and ensuring the widespread rollout of Gigabit connectivity.

The **third annual report on the state of the Digital Decade**[94] analyses progress towards the targets set for 2030. Although advances have been recorded in the digitalisation of public services, 5G coverage, and edge nodes – supported by approximately two thousand measures and over €288 billion – structural criticalities remain. Advanced connectivity (fiber and 5G stand-alone) and strategic infrastructure are still insufficient and overly dependent on foreign sources. In parallel, the adoption of technologies such as AI, Cloud, and Big Data is progressing slowly. On the social front, the deficit in basic digital skills affects nearly half of the European population, while the shortage of ICT specialists and the persistent gender gap hinder development in key areas such as cybersecurity. Growing energy demand, fueled also by the expansion of AI, threatens to slow technological evolution due to the limited availability of clean energy and network capacity. Simultaneously, digital acceleration raises urgent social concerns, from online disinformation and manipulation to the protection of minors and

DIGITAL COMPASS

The **Digital Compass** sets out the vision, objectives and approaches that will lead Europe towards the digital transformation by 2030. The four cardinal points of the Digital Compass are: citizens with adequate digital skills; secure, efficient and sustainable digital infrastructure; digital transformation of businesses; digitisation of public services.



"ITALIA A 1 GIGA" PLAN

Open Fiber has been awarded 8 lots[92] under the "Italia a 1 Giga" Plan, a project worth approximately €3.8 billion aimed at bringing fast internet to over 6 million street addresses distributed throughout the national territory. The objective of the Plan is to promote, through public intervention, investments in ultra-broadband networks that ensure all users a connection speed in line with the European goals of the Gigabit Society and the Digital Compass, aiming to reduce the digital divide in our country.

90 Legislative Decree. n.33/2016.

91 Resolution approved on Thursday 5 July 2012 by the United Nations Human Rights Council.

92 Nine regions – Campania, Emilia-Romagna, Friuli-Venezia Giulia, Lazio, Lombardy, Puglia, Sicily, Tuscany, and Veneto – for a total of 3.8 million street addresses in over 3,800 municipalities.

93 International Telecommunication Union (ITU).

94 Published in June 2025.



mental health. In this scenario, 2025 represents the decade's watershed: closing these gaps is indispensable to consolidate European digital sovereignty, protect the community, and unlock economic benefits estimated at up to 1.8% of GDP. The report highlights three lines of action to achieve the digital decade goals: **increasing public and private investment** to strengthen innovation with a focus on strategic technologies such as advanced connectivity, semiconductors, secure cloud, AI, quantum, cybersecurity, and digital skills; **implementing structural reforms** to strengthen the single market and ensure EU technological sovereignty, supported by new initiatives such as the Digital Networks Act, the Quantum Strategy, and the Cloud and AI Act; and **simplifying administrative burdens** for European businesses to foster a more competitive and innovative environment. Although the country is accelerating in strategic technologies such as semiconductors and quantum computing, a delay remains in the adoption of AI and the consolidation of the ecosystem for start-ups and scale-ups. Citizens' perception, as recorded by the **2025 Eurobarometer**, reflects this scenario: while 73% of Italians acknowledge that digitalisation simplifies daily life, 90% consider it a priority to combat disinformation and support the global competitiveness of European businesses.

In light of this analysis, Open Fiber's contribution and mission become even more crucial in fostering the achievement of digital transition targets set by the European Union through its digital strategy and the Digital Compass, as well as by the Italian Government through the NRRP. Indeed, to reach these milestones, the implementation of Fiber To The Home (FTTH) technology and the ultra-broadband network that the Company is developing across the entire national territory is indispensable.

"ITALIA DIGITALE 2026"

"Italia Digitale 2026" is the national strategy designed to accelerate the country's digitalisation process, structured around two fundamental pillars: the digital transformation of the Public Administration and the extension of ultra-fast networks across the entire national territory. The systemic framework devised by Italy sets five objectives:

- the widespread adoption of digital identity;
- the reduction of the digital skills gap;
- the migration of the majority of Italian Public Administration services to the cloud;
- the effective online availability of most essential public services;
- 100% coverage of Italian households and businesses with ultra-broadband networks.

Open Fiber's infrastructure is aligned with this strategy and aims to enable advanced innovative services that promote equality and equal opportunities among users, fostering greater inclusion.

DIGITAL NETWORK ACT (DNA)

On 21 January 2026, the proposal for the Digital Networks Act was adopted. The **Digital Networks Act (DNA)** represents a major boost to the modernisation of European telecommunications, accelerating the copper switch-off and the transition to **full fiber** networks, that are more sustainable and efficient.

According to the Commission, this evolution could **generate over €400 billion in European GDP growth** and contribute to emission reductions, fostering a more attractive environment for investment. Furthermore, the DNA aims to make the European telecommunications market more **harmonised and competitive**, while strengthening **resilience and cybersecurity**.

The Regulation is fully consistent with Open Fiber's sustainability strategy, promoting cooperation between institutions, authorities, and operators for an orderly migration from copper to fiber. However, this framework highlights the need for **national support policies** to effectively accompany the transition.

4.2 OPTICAL FIBER AS AN OPPORTUNITY FOR THE TERRITORY

From smart working to home automation, and from education to entertainment: in a world where digital is the engine of daily life, the demand for connectivity in Italy has experienced unprecedented expansion. In this scenario, Open Fiber's infrastructure enables a new ecosystem based on ultra-broadband that generates value for the entire territory. Indeed, the widespread rollout of optical fiber is the driving force for the country's competitive and social development: it contributes to GDP growth, stimulates employment in related industries, and plays a decisive role in the revitalization of small municipalities, granting them a new economic centrality.

#GOODSTORIES

Bridging distances, uniting territories

On 10 November 2025, Sardinia bridged the gap with the mainland thanks to the activation of the **Olbia–Fiumicino route**. Terrestrial and submarine backbones meet at the Gallura Data Centre, creating a stable, efficient infrastructure designed with a focus on energy impact. Bringing digital services closer to the island means limiting travel, consumption, and dispersion, making the use of technology more responsible. In this way, connectivity becomes a factor for balanced development, capable of supporting businesses and public administration without altering the territory's identity.

4.2.1 EDUCATION PLAN: *"PIANO SCUOLE"*

In Italy, economic fragility primarily affects the younger generations: according to the latest Istat report[95], more than one in four minors is at risk of poverty or social exclusion, with critical gaps in the *Mezzogiorno* (Southern Italy) and among foreign communities. As highlighted by Save the Children[96], material poverty is compounded by learning loss – an educational impoverishment that threatens to

95 Living conditions of minors – Year 2024.

96 Year 2022.

THE FUTURE OF THE SCHOOL SYSTEM

E-learning has secured a prominent place in schools and education, radically redefining our concept of learning. Today, the school system alternates between distance learning and in-person lessons, and digital-based projects are set to become even more widespread. Thanks to a fast connection, e-learning can take various forms: online courses, learning modules, workshops, webinars, video lessons, learning platforms, and integrated or extracurricular online activities. Where physical structures fall short, the web steps in – a true rewriting of the concept of study that would not be possible without optical fiber.

undo decades of progress in education[97]. The advent of digital learning environments has transformed ultra-fast connectivity and access to electronic devices into essential goods: without them, the new frontiers of teaching risk becoming further factors of marginalisation rather than opportunities for advancement.

In the plan to overcome the digital divide scheduled for the coming years in Italy, Open Fiber has confirmed its commitment to curbing this phenomenon with a business model oriented towards generating positive social impact through an adequate and modern digital infrastructure for schools nationwide. Indeed, the Company plays a fundamental role in improving internet connection performance in schools, providing innovative and scalable technologies that allow students and teachers to fully exploit digital opportunities: a contribution to bridging the digital divide and promoting an increasingly connected and inclusive education.

Piano Scuole

By 2026, Open Fiber will connect over **27,000 schools** via optical fiber, with the aim of digitalising educational institutions and enabling services in line with modern requirements. The two "Bandi Scuole" (School Tenders) of 2020 and 2022 provide for a symmetrical 1 Gbps connection (with at least 100 Mbps guaranteed) to school facilities, specifically to all lower and upper secondary school buildings and, in "White Areas", the connection of all primary and nursery school complexes as well.

The objective is to guarantee the **right to education** in the "school of the future" to as many people as possible. Most of the institutions reached are part of the "***Piano Scuole***" tender, launched by the then Ministry of Economic Development (now Ministry of Enterprises and Made in Italy) for the provision of ultra-broadband internet connectivity services at numerous school sites across the country. Thanks to the tender, in which Open Fiber participates for the



97 "Educational poverty" is defined as "the impossibility for children and teenagers to learn, experiment, develop and freely foster their capacities, talents and aspirations" (Source: Save The Children).

#GOODSTORIES

Parrano (Terni) – Local Healthcare Bridging the Distance

Parrano is a small Umbrian municipality of just over 500 inhabitants, nestled among the hills of the Amerino area. Here, the municipal pharmacy has become much more than a healthcare outpost: it now houses a **clinic for basic examinations**, primarily serving the elderly population. Thanks to Open Fiber's optical fiber connection, clinical data is transmitted in **real-time** to doctors, who can provide rapid diagnoses without forcing patients to undertake long journeys. It is a concrete example of how technology can support local healthcare and improve the quality of life in inland areas, where access to services is often a daily challenge.

Macerata – Innovation in Service of Vulnerability

In Macerata, the **Piombini Sensini** association has been operating since 1895 with a mission of providing shelter, protection, and care for **minors in difficulty and vulnerable families**. On the occasion of its 130th anniversary, the **renovation** of its historic headquarters – which houses the Centre for families with children aged zero to six – is currently underway. Open Fiber is contributing to the computerisation and digitalisation of these spaces, making services and networking with healthcare, social services, and the judicial authorities more **efficient**. This is an example of how connectivity can strengthen local welfare and community support.

structural part of the project, schools will be able to benefit from a symmetrical optical fiber connection of up to 1 Gbps free of charge for a period of five years.

4.2.2 CONNECTED HEALTHCARE AND TELEMEDICINE

In recent years, **telemedicine** has become an increasingly prominent theme within national[98] and international policies. Recognised by the WHO (World Health Organisation) as one of the main pillars of global medical evolution, telemedicine today represents the strategic response to an ageing population and the rise of chronic pathologies. In a country like Italy, characterised by historical disparities in the distribution of healthcare facilities, the digital model guarantees assistance, monitoring, and timely prevention, reducing travel costs and times for both the healthcare system and the patient. Far beyond simple video consultations, this discipline integrates IoT solutions and smart devices that require secure and stable infrastructure for managing sensitive data. Thanks to fiber speeds of up to 1 Gigabit, Open Fiber enables this transformation, playing a decisive role in monitoring projects for the most fragile and chronic patients.

To support this evolution, Open Fiber has committed to connecting over 9,000 healthcare facilities via optical fiber by 2026. Thanks to the 2022 "*Sanità Connessa*" (Connected Healthcare) tender, the public healthcare facilities involved, distributed across the entire national territory, will be able to receive connectivity with symmetrical speeds from 1 Gbps to 10 Gbps, as well as the supply and installation of the access network, management services, technical assistance, and maintenance for at least five years following the completion of the works.

In 2025, throughout the Italian territory, there are approximately **3,800 healthcare facilities** among those covered by the Open Fiber network and those with a connection already tested.

4.2.3 DIGITALISATION OF PUBLIC ADMINISTRATIONS

The digital transformation of the Public Administration and the widespread rollout of ultra-fast networks represent strategic assets for the country. In this context, Open Fiber is at the forefront of enhancing

98 Telemedicine – which became part of the National Health Service in 2020 with guidelines regulating consultations, reports, and tele-assistance – is recognised by the Ministry of Health as a fundamental tool for increasing equity in access to social and health services in remote areas. In 2022, the guidelines for telemedicine services were approved (Legislative Decree no. 179/12), establishing the essential requirements to guarantee nationwide homogeneity.

#GOODSTORIES

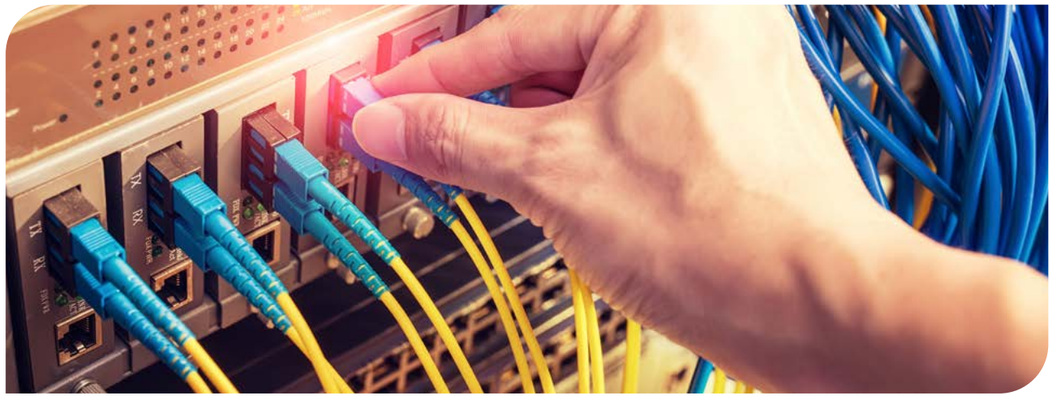
Atrani: Italy's smallest municipality accelerating towards the future

Atrani (SA), the smallest municipality in Italy, has been entirely wired with FTTH optical fiber thanks to the Ultra-Broadband Plan, also connecting strategic public buildings such as the Town Hall and the outpatient clinic. Fiber marks the transition from the past to the future, ensuring new digital efficiency: services such as the issuance of identity cards are now instantaneous. On the healthcare front, fiber is fundamental for telemedicine, making report management and citizen assistance simpler and faster – especially in a territory where the hospital is distant and difficult to reach during tourist seasons. Furthermore, the "Pharmacy of Services" can offer timely prevention and care thanks to the speed and reliability of the connection.

the online services of public bodies, schools, and healthcare facilities. Thanks to the stability of optical fiber, it is possible to break down barriers between institutions and citizens, reducing bureaucratic processing times and optimising key processes such as electronic invoicing and access via digital identity (SPID). Furthermore, the infrastructure enables the Smart City model, supporting sustainable mobility – from intelligent management of parking and restricted traffic zones (ZTL) to charging stations – and strengthening local security through video surveillance systems and environmental monitoring. From the enhancement of cultural heritage[99] to the efficiency of public lighting, ultra-broadband transforms municipal services into a modern, rapid, and sustainable ecosystem.

Moving citizen services online: revamped efficiency

The digitalisation of citizen services makes it possible to speed up procedures that would normally require significantly more time and money. Each of us has immediate access to all the necessary tools to submit applications and easily consult the required criteria remotely. One only needs to think of how many times in the past we were caught in a constant back-and-forth with municipal offices due to missing documentation needed to complete formalities. Likewise, a full online migration of services would make officials' operations more fluid and efficient, also reducing the completion times for open cases and thus increasing end-user satisfaction.



99 For further details, see paragraph 5.5 (Smart City).

4.2.4 PARTNERSHIPS AND INITIATIVES BOOSTING COMPANIES' COMPETITIVENESS AND THE PUBLIC ADMINISTRATION EFFICIENCY

Open Fiber promotes the country's digital transformation through strategic partnerships and targeted initiatives, offering cutting-edge technological solutions and ultra-fast connectivity even in the most remote areas. The widespread reach and reliability of its infrastructure make the Company the partner of choice for businesses, associations, and the Public Administration. Thanks to stable and high-performance connections, local organisations can optimise their daily operations, compete on global markets, and ensure efficient communication channels with customers and citizens.

Open Fiber and Nokia: 100 Gbps achieved

In partnership with Nokia, Open Fiber was the first wholesale operator in Europe to test record-breaking optical fiber connection speeds of up to 100 Gbps. Building on Open Fiber's current network of up to 10 Gbps, the trial demonstrates how different PON technologies can coexist on the same infrastructure, increasing network capacity without additional structural interventions. The tests also explored new applications – for example, in healthcare and industry – that require high speeds, low latency, and reliable data transmission to connect to the cloud in real-time.

Open Fiber: voucher initiative for C&D municipalities

Open Fiber confirms and expands the number of municipalities involved in the "Open Fiber: the choice that rewards you" initiative – a voucher to activate an ultra-fast connection with the Company's partner Operators, available to citizens in 805 municipalities within Clusters C&D. The offer aims to incentivise the use of the FTTH network built in the BUL Plan, covering approximately 1.5 million property units. This plan represents a strategic investment for the digitalisation of the national territory, especially in the most difficult-to-reach areas and small villages.

"100% Fibra Vera" Project

In 2025, Open Fiber launched a project aimed at accelerating the network switch-off in ten municipalities. The **"100% Fibra Vera"** project is a strategic initiative designed **to speed up the decommissioning of copper networks**, completely replacing them with optical fiber (FTTH) across the national territory, starting with small municipalities. In these areas, communication and field marketing campaigns were implemented to raise awareness among citizens and incentivise the switch to FTTH. Furthermore, the project reduced migration times thanks to Open Fiber's infrastructural interventions and, partly through collaboration with local institutions, enabled the **digital development of the involved municipalities** by providing innovative services in previously underserved areas, transforming small villages into digital territories. The partnership between Open Fiber and municipal administrations has made it possible to move beyond copper networks, replacing them with a more efficient, less energy-intensive technology designed to last, enabling sustainable services such as Smart Working and telemedicine for the country's future.

Connected Territories

Open Fiber has launched local **marketing activities across 93 municipalities in Clusters C&D** to promote awareness of the benefits of FTTH optical fiber in municipalities with low take-up rates. For approximately three months, a wide range of promotional activities were deployed, from communication campaigns to promoters and fixed info-points, accompanied by **branded electric cars** that helped to further spread the message. This initiative involved 215,000 property units.

Open Fiber: an increasingly simple Customer Journey – My Fiber App

In 2025, Open Fiber expanded and improved the services included in the My Fiber App, the web app designed for the end customers of participating partner operators. The app offers digital Customer Journey services aimed at enhancing their Customer Experience and providing updates on the progress

of FTTH activation requests. To date, over 60 operators have joined the platform. Thanks to these tools, communication transparency and customer awareness have increased, thereby reducing the number of calls to support centres, cancellations, and unnecessary technical interventions.

Open Fiber and OFNS, Project P360

Since 2024, the Company has laid the groundwork to invest in infrastructure-based partners and give a stronger voice to local territories. The objectives are: to strengthen the operator's direct relationship with the end customer through an E2E (End-to-End) journey from sale to delivery; to invest financial resources in local businesses; to support the operator towards full management autonomy of activation orders, thanks to OFNS's support during onboarding; and to improve sales and delivery performance as well as average activation times. By early 2026, the initiative has already achieved positive results, and the Company intends to continue to complete the affiliation of the 40 operators engaged to date and exceed **140+ municipalities** under management.

OLO DAY & RoadShow: face-to-face meetings with operators

Open Fiber organises **OLO DAYs**, meetings with operators to present ongoing initiatives and support customer acquisition, particularly in Clusters C&D. These events showcase performance-focused programmes such as the My Fiber App, C&D commercial incentives, and the extensions of the voucher promotion. Participants can visit the SOC (Service Operations Centre) and the Open Factory, take part in Q&A sessions and workshops on developing "White" and "Grey" areas, and engage in brainstorming sessions with Management to share opinions and suggestions.

The Company also organises **roadshows**, events where Regional commercial performance is presented by the sales team, alongside updates on products, services, and Delivery and Assurance performance in collaboration with local Factories. The goal is to listen to partner feedback and gather their ideas.

"Fibra in Comune"

The "*Fibra in Comune*" project is promoted by Open Fiber to encourage the rollout of FTTH optical fiber in White Areas, currently in a pilot phase in the Lombardy region. The project's objective is to offer interested operators the chance to expand their commercial coverage (by participating in a specific tender) to increase the take-up of fiber lines, incentivising citizens to adopt FTTH technology in territories covered by the OF network. The project involves creating a co-invested commercial channel that allows operators to promote supply contracts through the Infratel network at competitive economic rates. This includes the involvement of selected agents who carry out promotional and sales activities, such as managing commercial spaces, local marketing campaigns, and a presence at local events and festivals.

PPP L'Aquila

Open Fiber and Cellnex Italia S.p.A. have signed an agreement for the joint submission to the Municipality of L'Aquila of a **Public-Private Partnership (PPP)** proposal. The project concerns the construction, management, and maintenance of an infrastructure enabling Smart City services. Through this infrastructure, it will be possible to deliver the most advanced and innovative digital services for citizens, businesses, and institutions within the municipal territory.

Open Fiber and A2A Smart City S.p.A.

Open Fiber and A2A Smart City S.p.A. have signed a **MoU** (Memorandum of Understanding) to collaborate on the provision of their respective **services** and joint participation in **public and private projects**. This partnership leverages A2A Smart City's expertise in developing innovative solutions and the widespread reach of Open Fiber's optical fiber infrastructure across the national territory. The agreement is specifically aimed at developing projects within the Smart City sector.

CREATIVITY WITHOUT DISTANCE: FIBER THAT MULTIPLIES COLLABORATIONS

Innovations also enhance entrepreneurial and artistic ideas, as they say in **Brolo**, one of the five Italian municipalities involved in the "**100% Fibra Vera**" project. In this town on the Tyrrhenian coast of Sicily, life has significantly improved with the arrival of optical fiber. A prime example is Dario Cerrito: singer, multi-instrumentalist musician, and producer, who also runs his own recording studio. "With the arrival of optical fiber in Brolo, my life has changed, especially regarding downloading files or plugins, which is now much easier. Collaborations with other musicians have also become simpler. I often talk to a close friend of mine, a producer in Salerno: when I need a hand, I just connect with him for a mix or an arrangement. We can send files without losing quality and, above all, very quickly." Cerrito also highlights the reliability of high-speed fiber: "I take singing lessons from my teacher in Bergamo via an online connection; it is practically as if he were right here next to me."

Operational agreements between the Metropolitan City of Milan, State Police, Niguarda Hospital, and Open Fiber

In October 2025, Open Fiber signed operational agreements with the Metropolitan City of Milan, the State Police, and Niguarda Hospital for the interconnection of the metropolitan optical fiber network in view of the **Milano-Cortina 2026 Winter Olympics**. On the occasion of this major sporting event, Open Fiber was commissioned to extend the fiber network from Milan to the State Police sites in Valtellina to ensure Olympic security, and to the medical outposts of the "Olympic Hospital" (Niguarda Hospital and Sondalo Hospital), along with the guesthouses hosting personnel during the event. Furthermore, a convention was signed for the reciprocal use of their respective infrastructures, marking a significant **synergy between the public and private** sectors aimed at network optimisation and the reduction of costs and environmental impact. This is a strategic and equal partnership that aims to revolutionise telecommunications infrastructure, with an investment that translates into approximately **900 kilometres of network.**

4.2.5 CONTRIBUTION TO COMPANIES' DEVELOPMENT

In a global market driven by new consumption habits, digitalisation has become a decisive factor for business resilience and competitiveness.

ITALY SUPPORTING SMES' CONNECTIVITY

In recent years, Italy has intensified its efforts towards the country's digitalisation, particularly for Small and Medium-sized Enterprises (SMEs), the true engine of the nation. A fundamental prerequisite for this is the enhancement of their connectivity. With the goal of incentivising the adoption of ultra-broadband, the Government has allocated a fund of nearly €600 million for vouchers that offer discounts on high-speed internet subscription fees.

This scenario is particularly critical for Italian Small and Medium-sized Enterprises (SMEs), which face international competition while grappling with a structural technological gap. Ultra-fast optical fiber infrastructure acts as the essential enabler to bridge this digital divide, supporting the evolution of the national economic system and opening new growth prospects for the country's productive fabric.

Open Fiber's high-performance infrastructure strengthens the resilience of SMEs, projecting them onto a global scale. Thanks to connectivity capable of guaranteeing stability and continuity, **businesses can expand their reach, optimise internal processes**, and adopt Cloud and Big Data solutions without interruptions, transforming the management of large volumes of information into a concrete competitive advantage.

#GOODSTORIES

The Digital Experience of the Ponticelli Farm

The digital transformation of the Ponticelli Farm in **San Marino di Carpi** demonstrates how the arrival of FTTH optical fiber can have a profound social and economic impact, especially in rural areas. Thanks to the infrastructural upgrade provided by Open Fiber, this small family-run farm with a long tradition was able to overcome the limitations of its previous ADSL connection, which had hindered essential daily activities. With the new ultra-fast connectivity, the company has enhanced its **digital presence**, expanded its **sales channels**, and strengthened relationships with customers and suppliers, proving that quality infrastructure is a tool for sustainable growth even in the most traditional sectors. From a social perspective, the adoption of this technology has fostered **generational inclusion**, allowing younger generations to bring innovation to the business without losing their roots in the local area. This experience highlights how advanced connectivity contributes not only to economic efficiency but also to strengthening the social fabric of rural communities, enhancing local human capital.

To wire the country, Open Fiber also collaborates with supplier companies for the **construction, management, and maintenance of the optical fiber infrastructure**. In doing so, the Company contributes to the economic growth of the businesses involved and to the employment of specialised figures such as jointers, cable layers, and designers. For these professions, Open Fiber offers certified courses to refine practical and theoretical knowledge regarding excavation, laying, and installation activities, demonstrating a constant commitment to the people and companies within the local territory.

4.2.6 SMART WORKING

Smart Working has established itself as a structural work model, based on a flexibility that has become indispensable for both companies and professionals. In Italy, the phenomenon is entering a new phase of expansion: in 2025, the number of smart workers reached **3.57 million**, surpassing the 3.55 million recorded the previous year. In large enterprises, growth continues (+1.8%), now involving **53% of staff**. However, the true driver of this trend is the **Public Administration**, which recorded an **11%** increase: today, 555,000 public employees work remotely, accounting for **17% of the total sector**. Despite the expansion of agile working, numerous areas of the country – particularly small villages and mountainous regions – still suffer from unstable connections. This infrastructural gap represents a critical limit to the full rollout of Smart Working on a national level. In this scenario, Open Fiber's optical fiber acts as a concrete solution: by guaranteeing ultra-fast performance and operational continuity, it allows for stable work from any location. The infrastructure not only supports the competitiveness of local businesses but also helps to combat depopulation, offering people the opportunity to remain in their territories of origin without the need to relocate to large urban centres.

#GOODSTORIES

Stargazing from home: science and quality of life

Thanks to optical fiber, astrophysicist Carmelo Falco was able to set up an astronomical observatory in his vegetable garden in Racalmuto, balancing his scientific passion with a more human-scale lifestyle. In collaboration with the GAL Hassin astronomical centre in Isnello (Palermo), the astrophysicist benefits from the ultra-fast connection installed by Open Fiber. The company played a leading role in wiring the scientific hub by connecting the telescope located at the summit of Mount Mufara via optical fiber – a spectacular operation that required the support of a helicopter.

#GOODSTORIES

Viggianello, when connectivity becomes a daily advantage

Viggianello (Potenza), a small village in the heart of the Pollino National Park, has increasingly transformed into a **connected community**. Public employees and private entrepreneurs can now easily take advantage of ultra-broadband. Having this type of connectivity is a significant advantage, as noted by a public employee and smart worker who points out: "the difference compared to the office where I work, because we don't have this connectivity there, so I can browse much faster from home."

Equally important is the testimony of Alessandro Gioia, CEO of **Egreenbox**, a company specialising in the marketing of **"smart" bins:** "A company like ours could not have existed, let alone grown, without adequate broadband, especially since we have all the servers managing our network in-house. But it's not just that – it's everything regarding communication, being able to work remotely, meeting customers, and hosting meetings: all activities that you simply cannot carry out with low bandwidth."

RESULTS 2025

WHITE Areas

5,962

Small Municipalities with CUIR (Network System Completion Certificate)

4.3 PROTECTION OF THE TERRITORY

Italy's diverse landscapes, the uniqueness of its villages, and its cities rich in culture, art, and tradition are admired worldwide. Open Fiber aims to help safeguard the beauty and integrity of the land while ensuring equal access to services across every part of Italy. To this end, it is building a widespread ultra-broadband optical fiber network extending even to small municipalities, which often face depopulation partly due to a lack of high-speed connectivity. The work carried out by the Company has enabled some cities to evolve into true Smart Cities and made smaller residential areas more attractive to both residents and tourists.

Building a comprehensive network can cause temporary interference with existing infrastructure and underground utilities. To limit potential disruptions, a responsible approach is adopted, rigorously assessing both actual and potential environmental and social impacts. The deployment strategy prioritises the reuse of existing infrastructure and, where necessary, the use of low-impact excavation technologies. This operational model ensures sustainable interventions, preserving the integrity of the area and minimising the footprint of construction sites.

#GOODSTORIES

Civitacampomarano (Campobasso) – A castle connected to the future

In Civitacampomarano, a village of about 300 inhabitants in the heart of Molise, the **Angevin castle** dominates the landscape and serves as the main tourist attraction. It is a site of great **archaeological value**, preserving original defensive structures and medieval layers. Thanks to the optical fiber connection established by Open Fiber, the castle is now at the centre of a digitalisation process promoted by the Municipality. The objective is to enhance the historical heritage through digital content, events, and new forms of cultural promotion. Even in the smallest villages, the network becomes a lever for development and knowledge.

4.3.1 REPOPULATION AND APPEAL OF SMALL MUNICIPALITIES IN ITALY

Italy's demographic decline is hitting small municipalities particularly hard, especially in

#GOODSTORIES

Goodbye depopulation! Fiber has arrived

From the coast to the mountains, the small southern villages of **Sambuca di Sicilia, San Bartolomeo in Galdo, Cetara**, and **Buccheri** are opening up to the world, offering new opportunities thanks to latest-generation digital infrastructure. These communities are fighting depopulation in various ways: through business services, attracting citizens from abroad, and developing tourism. For instance, Americans Gary and Tamara Holm chose to live in Sambuca: «*Here we found Open Fiber, which allows us to browse the internet better and faster than in Los Angeles. It's crazy!*».

Fiber in the Bergamo mountains

In the small mountain Municipality of **Moio De' Calvi (Bergamo)**, the arrival of Open Fiber's FTTH has marked a turning point: today, 350 property units can rely on a fast and reliable connection that supports Smart Working, digital tourism, and essential community services. Besides improving the quality of life and attractiveness for young people and professionals, the fiber has enabled local businesses to innovate, all while reducing environmental impact through sustainable technological solutions.

Bridging the gap and restoring the future to mountainous territories

A **Montefiorino (MO)**, l'arrivo della fibra ottica FTTH di Open In Montefiorino (MO), the arrival of Open Fiber's FTTH has brought to life a modern, public, and sustainable network connecting over 1,630 property units. This is a true turning point for the area, promoting the social regeneration of inland regions and bridging the digital divide, restoring new growth prospects to the community. Today, citizens and local businesses can benefit from stable and fast connectivity – a fundamental element for increasing the area's attractiveness, encouraging Smart Working, and boosting the competitiveness of local enterprises.

mountainous and isolated areas. Over 6,000 villages are classified as "depopulated,"[100] and 5,526 have fewer than 5,000 inhabitants[101]. Notably, 73% of these small municipalities are considered to be in "exodus," facing the real danger of total territorial abandonment. This phenomenon, fuelled by migration to large urban centres in search of job opportunities, has led to a progressive ageing of the population: according to Istat data, those over 65 now represent nearly 25% of residents in small towns.

To combat depopulation and the digital exclusion of these territories, targeted intervention is required. This is why Open Fiber's work to bridge the digital divide – through the Strategic Plan for Ultra-Broadband (or BUL Plan)[102] and the *Italia a 1 Giga* Plan[103] – is considered fundamental to reversing this trend in small municipalities. With ultra-broadband, every territorial and professional barrier can be broken down, allowing small business owners to connect and collaborate with larger organisations and reach more potential customers. For example, many digital professionals, such as graphic designers and digital creators, have moved back to these areas because they can finally carry out their work exactly as they would in a major city.

This complex process must be tackled gradually to ensure that infrastructure development goes hand-in-hand with the spread of technological and digital skills among the population. In recent years, Italy has recorded significant progress in digital adoption: according to Istat data, the share of regular internet users has grown by approximately 25%, while household network access has increased by 28%. However, these positive figures are not evenly distributed: in small towns, connection availability remains markedly lower than in urban areas. This disparity is often attributable to the limited presence – or, in many cases, the total absence – of adequate technological infrastructure.

SUPPORTING THE SPREAD OF CONNECTIONS IN THE WHITE AREAS

In order to support the spread of FTTH connections in white areas, Open Fiber has promoted an important commercial operation, concerning both passive and active GPON services, which has led to a reduction in the costs incurred by Operators for the activation of end customers of about 50% as regards the connection fee and about 25% for the fee relating to active services. The initiative has allowed the expansion of the portfolio of Operators interested in providing FTTH connectivity services in white areas, such as Vodafone and Iliad.

SMART WORKING FROM A SMALL MUNICIPALITY: AN OPPORTUNITY NOT TO BE MISSED

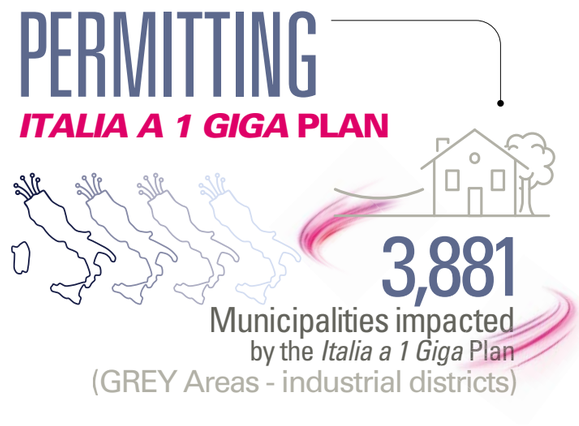
The arrival of ultra-broadband in small towns has made **Smart Working** possible even in historic villages, transforming it into an opportunity for growth and repopulation. A reliable, ultra-fast connection allows individuals to work from quiet and picturesque locations, offering a slower, more relaxed lifestyle and improving both physical and mental well-being.

#GOODSTORIES

Fiber and employment: the case of Borgorose

The historically fragile economy and high unemployment rate of Borgorose – a small municipality of approximately 4,000 inhabitants in the **province of Rieti**, on the border with Abruzzo – have been revolutionised by the arrival of ultra-fast connectivity. This was brought by Open Fiber as part of the Ultra Broadband Plan (BUL) for the digitalisation of outlying areas.

Until 2015, Borgorose had 193 active businesses providing work for 421 people, with an average of just two employees per business. The turning point came with the deployment of an FTTH network, funded by **regional and state resources**. This technological evolution has yielded extraordinary results: **unemployment, which was close to 50%, has dropped to 10% in just a few years**.



4.3.2 RELATIONS WITH THE LOCAL AUTHORITIES AND BODIES IN THE DOMAIN OF PERMITTING

In sparsely populated Italian territories – designated as "market failure" areas or "White Areas" within the so-called **Clusters C&D** – the BUL Plan requires between 10 and 15 permits to be issued for each municipality to start network-laying activities, creating a heavy administrative burden. To accelerate the works, the Company carries out **advocacy** activities aimed at the Government, Parliament, and local authorities, promoting uniform national regulations and faster procedures. Over the years, this has led to significant simplifications, administrative times being halved, and a more widespread use of Services Conferences (*Conferenze di Servizi*), with **over 200 conferences** held to share objectives and resolve potential critical issues.

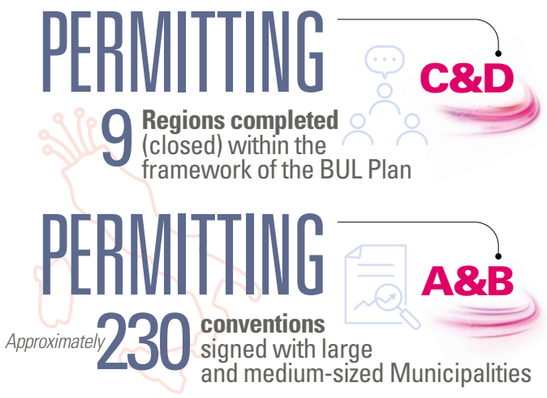
In high-population density zones – referred to as "Black Areas" within the so-called **Clusters A&B** – the Company initiates consultation meetings with the Municipal Administration before starting works

100 Source: ISTAT source.

101 Source: Legambiente, file "*Borghi Avvenire*".

102 The Strategic Plan for Ultra-Broadband (*Piano Strategico Banda Ultra Larga*, BUL) 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 National Territory.

103 *Italia a 1 Giga* Plan aims to promote, through public action, investment in ultra-broadband networks that 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 National Recovery and Resilience Plan (NRRP) and provides for an allocation of approximately 3.8 billion euros.



to share the activity plan and the operational steps for infrastructure construction. These discussions often lead to the signing of a **convention**. The Company has signed **approximately 230 conventions** with A&B municipalities.

As part of the **Italia a 1 Giga Plan**, and in order to meet the objectives of the NRRP (National Recovery and Resilience Plan) and the 2030 European Agenda, Open Fiber is promoting further simplifications to speed up permits and resolve critical issues related to opening construction sites, which often cause delays in work execution.

BUL PLAN COMPLETED IN SICILY

Sicily is accelerating its connection to FTTH optical fiber thanks to Open Fiber's infrastructural investments. In 2025, the milestone of completing the **Ultra Broadband Plan** (BUL) was reached on the island, involving a total of **300 municipalities** and an investment of €239 million. The region is **the first in the South and among the first in Italy** to complete the infrastructure project for White Areas.

In the municipalities involved, **over 4,500 kilometres** of optical fiber were laid, enabling FTTH connectivity for approximately 390,000 property units and around 285,000 via FWA technology (Fixed Wireless Access). Additionally, about 2,300 Public Administration sites – including schools, hospitals, healthcare facilities, municipal offices, libraries, and law enforcement agencies – were connected.

42nd ANCI NATIONAL ASSEMBLY

In 2025, Open Fiber participated in the 42nd ANCI National Assembly, where approximately 300 mayors, representing as many municipalities, requested updates on the progress of the BUL Plan and the Italia a 1 Giga Plan, or shared their successful experiences on how to best leverage the opportunities offered by new optical fiber networks. Furthermore, during the event, a seminar organised by Open Fiber titled "How to Enable the City of the Future" was held. The workshop focused on the digital transformation of cities, with a particular emphasis on innovative infrastructure, services for a more connected future, Edge Data Centres, and edge computing.

To facilitate permitting activities, Open Fiber has promoted a series of webinars and roundtables in collaboration with regional ANCI[104] chapters and several Regions. These events aim to provide Municipalities with detailed information regarding the project's characteristics and the Company's intervention methods.

In addition to dedicated permitting procedures and channels, the Company carries out cross-cutting activities such as discussions with the superintendents – aimed at protecting archaeological, monumental and landscape heritage – and with infrastructure and public utility service management companies, aimed at sharing the opportunity to reuse existing infrastructure for fiber installation.

104 *Associazione Nazionale Comuni Italiani*, National Association of Italian Municipalities.

"100% FIBRA VERA" PROJECT



In December 2024, Open Fiber organised the launch event for the **"100% Fibra Vera" (100% Real Fiber) Project** at its headquarters in Rome. This ambitious plan involves phasing out the copper network in favour of a "100% Fibra Vera" connection, aiming to incentivise the switch-off of traditional telecommunications infrastructure. During the meeting, the details of the initiative were presented to the mayors of the municipalities involved. This was followed by a visit to the SOC (Service Operations Centre), which was of particular interest to the participants. Expressing their appreciation and interest in the project, the mayors committed to personally leading communication and awareness activities for their citizens.

The digital revolution in telecommunications by Open Fiber began in early 2025 with the municipalities of **Brolo** (Sicily), **Vedano al Lambro** (Lombardy), **Boretto** (Emilia-Romagna), and **Monte San Biagio** (Lazio). The activity will continue in the coming years with projects aimed at steering the migration from copper to fiber.

SINGLE AUTHORISATION

The availability of ultra-fast internet connections represents, for all intents and purposes, a public utility service and a major opportunity for citizens.

Today, Open Fiber is committed to enhancing the value of the infrastructure built in "White Areas" through campaigns to raise awareness of the presence and utility of the optical fiber network. It is also focused on identifying "best practices" in collaboration with institutions to facilitate customer connections and significantly reduce activation times, thereby avoiding inconvenience for end users. To this end, the Single Authorisation (*Autorizzazione Unica*) has been proposed as a simplification tool. It has come to be considered a fundamental instrument, reintroduced in Open Fiber's strategic projects such as the "100% Fibra Vera" initiative.

4.4 SOLIDARITY PROJECTS AND INITIATIVES FOR THE COMMUNITY

4.4.1 PARTNERSHIPS AND INNOVATION SUPPORTING CULTURE

Partnerships with academia

Italy's digital transformation finds an essential engine of innovation within the academic world. For this reason, a virtuous circle of collaborations with leading Italian universities has been established, strengthening the link between higher education and the labour market. Over time, this commitment has resulted in guest lectures, internships, project work, and scholarships within Master's degrees and university courses. Furthermore, to support advanced research, two national PhDs have been funded: one focusing on **Artificial Intelligence applied to networks** (University of Pisa) and the other on **integrated photonic circuits** (University "Federico II" in Naples).

These initiatives are part of Mission 6 (Research Doctorate Programme) of the **RESTART** Programme –

"RESearch and innovation on future Telecommunications systems and networks, to make Italy more smart"[105] – the most significant public research and development programme ever implemented in Italy within the telecommunications sector, funded by the European NextGenerationEU plan as part of the **NRRP**.

Atena project

In 2025, the first edition of the "**Atena**" project concluded. This initiative, in partnership with the University of Sannio-Benevento and the University of Messina, aimed to involve university students in the development of project work focused on **seismic risk analysis** using **Fiber Sensing** technology. This innovative solution enables continuous, real-time measurement of seismic waves along the entire length of an optical fiber cable. Furthermore, students took part in a training programme covering specific topics related to optical fiber technology, curated by our internal professionals.

Open Fiber and ELIS: PCTO, *Percorsi per le Competenze Trasversali e per l'Orientamento* - Pathway for Transversal Skills and Orientation

Three Italian cities and as many schools, approximately **156 students** involved, **9 internal corporate mentors**, and **over 174 hours of training delivered** during face-to-face sessions in the classroom, culminating in around **20 internships**. This is the final balance of the PCTO (Paths for Soft Skills and Orientation) for the 2024/2025 academic year – the eighth edition of Open Fiber's training project carried out in collaboration with ELIS.

In the second half of 2025, the ninth edition of the programme for the 2025/2026 academic year was launched, involving three Italian technical institutes: the ISS G. Giorgi in Milan, the ITIS Giuseppe Armellini in Rome, and the ITI Galileo Ferraris in Naples. During 2026, students in their fourth and fifth years of high school will participate in meetings with the Company and its mentors, where they will have the opportunity to experience a corporate environment and acquire new skills by interacting with the organisation's professionals.

Italian Academy of the optical fiber

Open Fiber and ELIS, with the support of major TLC (Telecommunications) companies, continue to deliver training courses for **jointers, network designers, technical assistants, and FTTH optical fiber technicians**, aiming to train and upskill professionals in the sector. These educational pathways, also open to young graduates wishing to work in the world of optical fiber, have recorded an employment placement rate of nearly **100%**.

Distretto Italia

In partnership with ELIS and through the Open Fiber Network Solutions consortium, Open Fiber supports the transition and connection between the labour market and the academic world, aiming to bridge the mismatch between demand and supply by providing support in terms of orientation and youth employment.

With this proactive spirit, the ***Distretto Italia*** project – aimed at NEETs (young people not in education, employment, or training) – sets the goal of training technical-specialist professional figures and guiding students in finding their professional vocation. The plan's success lies in the creation of value networks between companies, training centres, universities, and schools, starting from the collection of corporate requirements. Since the launch of the project, **11 training classrooms** have been implemented, involving over **110 young students.**

#GOODSTORIES

A second opportunity for inmates thanks to the fiber

Optical fiber and the activities involved in its deployment can also be used to promote the social and professional rehabilitation of inmates, offering a second chance through new vocational skills. Open Fiber has pursued this goal through two distinct projects. The first, "**Nisida in rete**", led by the **Association founded in honour of Salvatore Nigrelli** – Open Fiber's former Head of the Southern Area who passed away prematurely – and implemented at the **juvenile detention centre in Naples**, included a training course based on nine two-hour modules. It also provides for the funding of a **three-year scholarship** by the Company, named after Salvatore Nigrelli himself. This opportunity was awarded to a young Algerian researcher, Mohamed Mammri, for his work based on Open Fiber's "Graphics" project. Ongoing research has already highlighted the concrete possibility of **miniaturising and remotely managing telecommunication network hubs**, significantly impacting the sustainability of future Smart Cities.

The second project, carried out at the adult prison in Caserta thanks to a memorandum of understanding with the Department of Penitentiary Administration, Infratel Italia, the city's ASI Consortium, ANIE SIT, and other TLC operators, aims to **reintegrate inmates into society** while addressing the **labour shortage** in optical fiber network laying and splicing activities.

#GOODSTORIES

Open Fiber and artistic and cultural heritage

Castelli (Teramo) – Centuries-old tradition and digital future

Castelli, with fewer than 900 inhabitants at the foot of the **Gran Sasso**, is one of the most beautiful villages in Italy and has been famous since the 16th century for the production of **artistic ceramics**. A cultural heritage that today looks to the future thanks to optical fiber. The connectivity created by Open Fiber allows artisans, workshops, and local institutions **to promote ancient knowledge online**, open up to **digital tourism**, and communicate with international markets. In a village where history is painted on majolica and facades, the ultra-fast network becomes a tool to preserve identity and at the same time create new economic and employment opportunities.

Sepino (Campobasso) – archaeology meets digital

Saepinum, the ancient Roman city of Sepino, is **one of the best-preserved archaeological sites in Molise**: walls, monumental gates, a forum, a theatre, and thermal baths tell a thousand-year-old story. Today, this heritage enters a new phase thanks to optical fiber. The site management has started a **digital museumisation** process that allows for new ways of enjoyment, study, and enhancement. Open Fiber makes it possible to use multimedia content, digital archives, and interactive paths, transforming the visit into an **immersive experience**. Technology thus becomes an ally of culture, even far from large urban centres.



The FTTH network reveals history: Gela, an open-air museum

The cabling of optical fiber can yield unexpected surprises. This is what happened during works conducted in 2019 in the **Municipality of Gela** (CL). On this occasion, **artefacts** from the period between the 7th and 5th centuries BC came to light, including a **necropolis** unique of its kind. The site dates back to the time of the very first Rhodian-Cretan settlers who established themselves in the area, and the ten burials found belong to a **children's cemetery** dating back to around the 6th century BC. Along with the tombs, an altar for funeral rites and various components of the **funerary goods** were also found. Open Fiber, together with the archaeological surveillance team of the **Superintendency of Caltanissetta**, rewrote the intervention plan to best **enhance these discoveries** of enormous historical value, transforming the Gela necropolis into a true **open-air museum** and significantly enriching its archaeological heritage with clear benefits for the city and its visitors. After 5 years of work, in the **summer of 2025**, the museum site was inaugurated and opened to the public.



105 For more details, see paragraph 5.9 "Research and Innovation through the Programme RESTART".

Overcoming the cultural digital divide: Open Learning

The digital divide is not merely a geographical barrier; one of its deepest roots lies in a lack of skills. True digital inclusion does not end with network availability; it requires the ability to master innovative services and emerging technologies, transforming technological access into a genuine development opportunity for every citizen. According to the 2024 **Digital Decade Report**, only **46% of people** in Italy possess basic digital skills (compared to 56% in the European Union) – a figure that remained stagnant from the previous year, while the EU average rose from 54%.

To address the challenge of digital education, Open Fiber created **Open Learning**, a platform on its website offering free online video lessons on various topics, including network fundamentals for beginners or those wishing to strengthen their basic knowledge of fixed and mobile networks up to the analysis of lesser-known technologies such as FWA; **advanced network systems** for those who already possess a fundamental understanding of telecommunications infrastructure; **digital & information management** for anyone looking to expand their professional know-how in a digital context regarding team collaboration, branding, data management, content creation, and corporate culture; and finally **YouDigital**, a test designed to challenge and assess one's digital knowledge.

4.4.2 INITIATIVES FOR THE COMMUNITY

Action on the ground translates into projects aimed at stimulating the economic and social growth of local communities. In 2025, initiatives for the benefit of the collective focused on innovation, sustainability, and digital transformation.

This constant commitment aims to support the local entrepreneurial fabric and break down disparities, promoting a model of development that is inclusive and future-oriented.

Training project *Navigare nel futuro*: discovering optical fiber

As digital education is an integral part of Open Fiber's mission, a training project was created to bring a new way of talking about digital to primary and lower secondary school classrooms. The goal was to bring young students closer to digital culture without excessive technicalities, transforming a subject often perceived as distant into something familiar. At the end of the educational section, students participated in a creative contest where they were asked to express their creativity, giving life to valuable insights on how they imagine the future of connections. The initiative also served as a catalyst for many parents to better understand what optical fiber is and what opportunities it creates for the community. The project was carried out in the Municipality of Vedano al Lambro (MB) and the Municipality of Pitigliano (GR).

Solidarity is in our blood

Open Fiber, in collaboration with **Rosso** (Ema Health) – a social value startup led by an under-25 team that promotes the culture of blood donation also among new generations – has promoted a digital platform to facilitate the booking of donation days at partner centres and ad hoc events for the corporate population with the aim of contributing, in the spirit of pure volunteerism, to making periodic blood donation frequent.

Open Fiber for the civil society

In the heart of **Cefalù Cathedral**, a masterpiece of Norman architecture in Sicily and a UNESCO World Heritage Site since 2015, an innovative space dedicated to digital training has taken shape, aiming to create a meeting and learning place for all those who do not have access to information technology and digital resources. The promotion and dissemination of digital culture has always been a central element of Open Fiber's mission. In line with this commitment, the Company allocated the budget intended for the Senior Management's 2024 Christmas gifts to support an important solidarity project promoted by the Diocese of Cefalù, demonstrating how technology and solidarity can integrate with one another to generate a positive and lasting impact on the community.

Christmas with *Piazza dei Mestieri*

In 2025, the Company renewed its commitment to a solidarity-focused Christmas by purchasing **charity Christmas Boxes** for company employees, in collaboration with "**Piazza dei Mestieri**", a Foundation active throughout the national territory committed to tackling **school dropout rates**. The initiative supports young people, both Italian and foreign, in fragile conditions, offering them the opportunity to acquire concrete skills and facilitating their entry into the world of work.

Open Fiber for AISM



Among the social initiatives, Open Fiber opened the doors of its Rome headquarters to **AISM – *Associazione Italiana Sclerosi Multipla* (Italian Multiple Sclerosis Association)**. During the initiatives "*Bentornata Gardensia*" (Welcome Back Gardensia)" and "*La Mela di AISM*" (The AISM Apple), the people of Open Fiber chose to support scientific research, which is currently the only weapon to defeat multiple sclerosis and related pathologies.

Tevere Day

Spotlight on the future of Rome, digital and beyond, during the 2025 edition of **Tevere Day**, in which Open Fiber has participated since 2024. Over 200 associations, bodies, and companies were able to engage in discussions regarding the **development policies of the Capital**. An opportunity to address and highlight development opportunities alongside critical issues related to the sustainability of the city and its fundamental waterway.



Race for the Cure

In 2025, Open Fiber was a partner of the **Race for the Cure** held in Rome from 8 to 11 May, aimed at funding educational and support projects for women fighting **breast cancer**.

Charity donations

In 2025, a significant donation of personal computers was promoted in favour of municipalities, non-profit organisations, public bodies, and individuals with limited digital skills. The initiative aims to facilitate the adoption of cutting-edge tools and to enhance the computer literacy of the most vulnerable segments of the population. Through this action, a concrete contribution is made to breaking down barriers to network access, generating a positive social impact and fostering democratic and informed participation in the life of the country.

Furthermore, in the same year, the Company made a voluntary donation to **TECHLAB**, the technological hub of **Spazio Vita Niguarda**, which develops ideas, services, training, and activities related to Innovation Technology applied to **disability**. This initiative is part of the corporate commitment to the concrete promotion of inclusion projects and within a broader perspective of sustainability.

Enhancing Italian entrepreneurship

The activation of the partnership with Challenge Network for the **Made in Italy** project is part of Open Fiber's broader commitment to social sustainability and the development of human capital. By supporting a community that enhances Italian entrepreneurship and promotes innovation, Open Fiber contributes to strengthening access to opportunities, the dissemination of skills, and the growth of local areas. An initiative consistent with the vision of sustainable, inclusive development oriented towards new generations.





Innovation and Development

05. INNOVATION

Since its establishment, Open Fiber has made technological innovation its cornerstone, reaching significant milestones not only in network cabling but also in the acceleration of Italy's digital transformation. Every kilometre of optical fiber represents a commitment towards the competitiveness of the national economic system: a strategic choice that transforms connectivity into economic growth, social inclusion and quality of life. Over time, the Company has established itself as a point of reference for the development of the Italian digital infrastructure, contributing decisively to economic growth and the evolution of production and social models. FTTH (Fiber To The Home) technology constitutes a revolutionary solution compared to the standards previously employed in the telecommunications sector, guaranteeing connectivity with significantly superior performance in terms of speed, stability and reduced latency. This technology represents a fundamental pillar for the implementation of advanced applications, such as **Smart Working, Industry 4.0, telemedicine and the Internet of Things (IoT)**.

The value of Open Fiber is not measured only in kilometres of **fiber**, but resides in its capacity to **generate shared value for the community and the territories** where it operates. By investing in research and development and with a solid network of strategic partnerships, the Company positions itself as a catalyst for digital progress in Italy and is committed to build an ecosystem capable of eliminating distances in a sustainable and inclusive manner.

5.1 NETWORK EXPANSION PROJECTS AND THE DEVELOPMENT OF NEW SERVICES

Aware of the speed of technological progress, Open Fiber does not limit itself to observing the future: it anticipates it. The Company has designed a network characterised by its neutral, open and optimised architecture, capable of allowing all Operators to provide their electronic communication services without any restrictions in the choice of technologies and network architectures. Maximising fiber coverage allows the creation of a **future-proof** network, which can enable increasingly high-performance and cutting-edge services, aimed at achieving the objectives of the European Gigabit Society, making possible the development of new technologies in TLC, such as 5G and its future evolutions. Thanks to its widespread, lean, efficient and technologically neutral structure, Open Fiber is able to:

- allow for the most effective disaggregation of access services;
- offer maximum flexibility for the most highly-structured OLOs (Other Licensed Operators), thanks to their widespread presence throughout the territory;
- enable maximum efficiency for less structured OLOs, thanks to the possibility of delivering the relevant services at the DP[106] closest to their networks;
- ensure scalability, quality and continuity of service thanks to the technologies adopted and the redundancy of the equipment and infrastructures that make it up;
- guarantee efficiency in management and speed in the provisioning of services thanks to an architecture, a simplicity and homogeneity of technologies that characterise a greenfield Operator.

Open Fiber, as a wholesale operator, designs and builds its network in such a way that it is capable of supporting the **progressive increase in demand**, while guaranteeing reliability, efficiency and security. The Open Fiber network is in fact highly scalable due to its simplicity and flexibility in adapting to the growth of traffic volumes over time and, given this nature, it already aims in the present to be easily extendable to other portions of the territory and types of users or services that may emerge in the future. Doing so facilitates optimisation and automation, also streamlining management phases and encouraging the conception and development of innovative services, particularly in multi-operator environments.

Over the next few years, Open Fiber plans to create partnerships aimed at selling computational capacity directly to Operators to allow their customers – end users – to outsource their processing capacity, thus eliminating the large initial investments required for ICT solutions. Optical fiber will have the strength to support the **development of citizen services** to be introduced soon and will modernise public utility services, facilitating, for example, the interconnection of a network of sensors capable of constantly monitoring the air and water quality of our cities.

5.1.1 BACKBONE 2.0 PROJECT

In order to respond sustainably to the unstoppable growth of data flows, Open Fiber has launched a project to develop its own Transport Network: **Backbone 2.0**. Designed according to a logic of scalability and maximum reuse of existing underground infrastructures, this project will guarantee excellent performance while fully respecting the commitment to reduce the environmental impact of the network infrastructure.

The work is divided into two macro-phases that strengthen the resilience of the long-distance network and diversify traffic routes, consolidating the country's digital backbone.

The project is in line with the EU objective of consolidating transport networks on backbone connectivity for global digital gateways, i.e., the creation of strategic networks that contribute to strengthen the quality of connectivity.

By upgrading the Backbone network, Open Fiber is expanding its services, offering long-distance dark fiber connections to the market. In this way, it will position itself as an enabling entity on the national

"NETWORK RESILIENCE" PROJECT

The increase in the number of customers and services offered by the Open Fiber network, as well as the ever-growing demand for capacity from end users, has made the launch of the **Network Resilience** project essential. The main objective is to provide an increasingly high-quality service to the OLOs accessing the network.

The project, launched during 2023, consists of multiple initiatives addressing the different layers of the Open Fiber network, from transport to regional networks, Metropolitan Area Networks (MANs), up to the physical infrastructure of the Points of Presence (PoPs). In this way, the network is strengthened to ensure service continuity and increased performance reliability for the end user. Through diversified routes at the PoP level for the metropolitan network and the doubling of routes in suburban areas, these projects will increase the pervasiveness and resilience level of the backbone network.

Activities carried out in **2025** significantly contributed to the strengthening of the network architecture, increasing the level of resilience, service continuity and the overall reliability of the performance offered to operators and end users.

The "Resilience" project recorded significant progress, with particular reference to the creation of **National PoPs** and the "**Dual-Homing**" project involving the transformation of Edge B sites into Edge A. With reference to the 34 national PoPs planned for the 2024–2026 three-year period, eight PoPs were infrastructurally equipped ("Room Ready" status), six PoPs were connected to the network ("On Net" status) and, of these, four were activated for traffic ("Ready For Service" status). Regarding the *Dual-Homing*[107] plan, 57 sites were implemented in the metropolitan and regional rings in 2025.

106 Delivery Point.

107 Dual-homing is a method used in network design to provide a device, typically a switch, router, or server, with connections to two separate physical networks.

territory both for the creation of digital ecosystems (Data Centres, industrial areas, etc.) and for the terrestrial continuity of submarine cables that will land on Italian landing stations. The project is also functional to prevent additional future investments by Open Fiber related to the expansion of fibers due to Backbone saturation.
The project also enables the sale of transport services on optical carriers (Optical Transport Network – OTN) of particular strategic relevance for the Business segment.

5.1.2 EDGE DATA CENTER

In a world that is more and more digitalised, the Data Centre sector is also adapting to meet the new demands for greater data management capacity and processing speed. To respond to this challenge, it is necessary to create a national network of **Edge Data Centres**, small data processing centres installed at the edge of a telecommunications network that allow for data processing and content storage at points closer to the end user, thus offering shorter routes and lower latency times. Furthermore, the geographical location of local Data Centres, oriented towards keeping data within national borders, offers positive impacts also on information security.
In this scenario, Open Fiber's future-proof architecture allows for the fiber connection of large Data Centres and the hosting, within its own technological sites, of spaces and services suitable for **Edge Computing**. In this way, network nodes become true innovation hubs, allowing the market to launch next-generation applications that require instantaneous responses and ultra-fast data management.
Future connectivity networks will consist of a mix of data storage, processing and transmission services, as a computing continuum. Open Fiber has begun a process of transformation in collaboration with innovators from the academic world and industrial partners: thanks to the high number of technological sites distributed throughout the national territory, the Company is an ideal candidate for the construction of a national network of Edge Data Centres (or Edge Nodes[108]), offering distributed computing and storage capacity and guaranteeing Business and Residential customers access to services and data with advantages in terms of:

- **reduced latency**: Edge Data Centres are located closer to end users, which reduces the distance that data has to travel, resulting in reduced latency and faster response times;
- **improved performance**: Edge Data Centres can improve application performance by processing data closer to the source, reducing the load on the network and improving overall performance;
- **cost efficiency**: Edge Data Centres are generally smaller and less expensive to build and maintain than traditional data centres, making them a cost-effective option for organisations with limited budgets;
- **scalability**: Edge Data Centres can be easily scaled up or down to meet business needs, which makes them a flexible option for organisations that need to adapt quickly to change market conditions;
- **security**: Edge Data Centres can offer advanced security features, such as physical security, access control and surveillance, to protect critical data and applications.

The distributed architecture of Edge Data Centres represents a fundamental component also for the energy efficiency strategy: reducing network traffic and the computing power used. Open Fiber's Project envisages the creation of **Edge Data Centres in 18 company sites to date** that may grow in subsequent phases with additional Edge Nodes within individual regions in response to the expected growth in demand for services. Although the Data Centre market is populated by a large number of players, Open Fiber stands out for offering a unique solution in Italy thanks to its assets:

- **new technological sites**: designed to be more resilient and scalable, in addition to further peripheral technological sites to reach the edge of the network;
- **FTTH access**: pervasive broadband access network, which collects traffic directly at the technological sites where most operators are already co-located/connected;
- **Backbone**: proprietary transport infrastructure suitable for providing high capacity and diversified routes;
- **Interconnections**: local presence and interconnection with all major IXPs[109] (MIX, NAMEX, etc.).

During 2025, Open Fiber completed the first three Edge Data Centres and launched the creation of a further ten, identifying the company's technological sites in which to install the Edge Nodes. The project was defined in synergy with the new technological sites, with the objective of increasing the pervasiveness and resilience of the Open Fiber network, and with the creation of the new Backbone 2.0. The Company has also launched the signing of agreements with the main Internet Exchange Points (IXPs), such as **NAMEX**, thanks to which customers co-located in the Edge Nodes will be able to interconnect with other market players, present both at the same Open Fiber Edge Nodes (Local Peering) and at the main national exchange systems (Remote Peering). During 2025, furthermore, the Company signed additional peering remotisation agreements with the other IXPs such as **MIX**, **TOPIX** and **VSIX**.



DATA CENTRE ECOSYSTEM

The European Data Centre ecosystem has historically spread throughout the countries of the FLAPD cities (Frankfurt, London, Amsterdam, Paris, Dublin). In recent years, we have been witnessing the birth of secondary markets, defined as TIER II, which are consolidating their emerging role with one city as a leader. In the scenario of the Italian market, Milan is confirmed as the main technological HUB, followed by **Rome**. In Italy, in the 2023-2025 three-year period, 30 organisations announced a total of **83 new infrastructural projects**, for an investment value of **7.1 billion euros** intended for the construction, fitting out and purchase of IT equipment for the new Data Centres. The sector's expansion phase continues without signs of slowing down, albeit with a temporal misalignment between announcements and the actual completion of infrastructures. According to estimates by the **Data Centre Observatory of the Polytechnic University of Milan**, in 2025 the nominal IT energy power installed at a national level reached **609 MW**, recording a growth of +19% compared to 2024.

108 System of decentralised peripheral nodes.

109 IXP: Internet Exchange Point, also called NAP (Network Access Point o Neutral Acces Point) is a physical infrastructure allowing different Internet Service Providers to exchange internet traffic between them.

BRINGING DATA CLOSER TO LOCAL AREAS TO GROW IN A SUSTAINABLE WAY

The inauguration of the **Pescara Edge Data Centre** on 24th September 2025 brings digital technology even closer to local territories. Data processing is moving **closer to businesses and communities**, reducing latency and the concentration of consumption typical of large centralised hubs. The distributed model improves energy efficiency, integrates renewable sources and lowers the overall environmental impact of digital infrastructures. At the same time, it enables advanced services without distancing data and people from the local context. Here, sustainability is a balance between technological performance, environmental responsibility and long-lasting development.

5.2 OPEN FACTORY

Open Factory is Open Fiber's experimental laboratory where the most innovative technologies for the FTTH network, FWA[110] access network, and transport network are tested, as well as for the development of new services, with the objective of offering advanced connectivity solutions to operators for both residential and business use.

Equipped with all the equipment and instruments useful for launching new technologies and services, the laboratory is a place that guarantees a rapid and accurate service innovation path in every phase. The complex, functional and modern, consists of a control room and an equipment room, equipped with all the network elements and instrumentation useful for testing.

Verification and Validation Tests (PVV – "*Prove di Verifica e Validazione*"), Proof of Concepts (PoC) of new network features and performance, demos of innovative services, and the development of know-how on new technologies: these are just some of the activities carried out within the laboratory. Tests are conducted using automation tools and a high-precision robotic optical matrix, which ensure a fast configuration of the testing environment, allowing for an easier transition from one test scenario to another.

Companies operating and supplying instrumentation for Open Factory adopt highly specialised technological solutions with a strong focus on optimising consumption and reducing the carbon footprint, following best practices adopted by international partners.

An environment of this type brings multiple advantages including:

- acceleration of the service and network innovation path;
- greater service stability and cost reduction (for testing, analysis and software corrections), thanks to the rapid transition from one testing scenario to another and by minimising human intervention for routine activities;
- speed in the release of new services (reduction of time-to-market).

Open Factory is a central hub for technological innovation, a laboratory for testing the future impact of corporate choices. During 2025, various innovative initiatives were conducted within the Factory, including:

- **QKD (Quantum Key Distribution)**: Open Fiber, in collaboration with CISCO and Thinkquantum, has focused on **Quantum Key Distribution (QKD)** technology, one of the most promising innovations in the field of advanced cryptography. The session started from the fundamental principles of this technology, such as how its application of the laws of quantum physics can guarantee the secure transmission of cryptographic keys; it then illustrated how QKD uses specific transmission protocols to generate and share symmetric keys between two distinct parties (for example, a sender and a recipient) so that any attempt at interception or unauthorised listening is immediately detected. For the practical demonstration, a configuration was set up in the laboratory with transmission and reception devices based on single-photon sources and highly sensitive detectors. During the PoC, various transmission scenarios were tested and the integration potential of QKD technology with existing security infrastructures was analysed, highlighting how this can represent a decisive step towards quantum-safe cryptography. The session concluded with a discussion on future prospects and possible developments, underlining the importance of investing in this technology to protect sensitive communications in a world increasingly exposed to advanced threats.
- **EDC Huawei (Edge Data Center)**: Open Fiber, in collaboration with Huawei, has conducted a Proof of Concept (PoC) on the implementation and operation of **Edge Data Centre (EDC)** technology within the Open Fiber network. The EDC project stems from a careful market analysis, conducted by the Company's commercial team, which highlighted a growing interest in distributed data centre services at the edge of the network. This market trend arises from the need to reduce latency, improve performance, and satisfy the increasingly demanding content requirements of customers for digital services. Open Fiber's main objective is to establish itself as a reliable and competent partner in the proximity data centre sector by creating a network of approximately 18 Data Centres distributed across the national territory for the distribution of digital content and services. During the PoC, activities focused on the simulation and testing of the entire network architecture and the equipment installed. In particular, the following were carried out: connectivity and configuration tests, performance verification, and resilience tests.
- **CDN (Content Delivery Network):** in the Proof of Concept (PoC) on **Content Delivery Network (CDN)** technology, the objective was to demonstrate the potential and effectiveness of a CDN integrated into a high-performance optical fiber network, such as Open Fiber's. The first phase involved the configuration of a test environment, where the servers making up the CDN were installed and configured, simulating a real content distribution network. A high-performance optical fiber network was also set up, characterised by high bandwidth capacity and low latency, to ensure optimal testing conditions and to highlight the benefits of the combination of fiber and CDN. Subsequently, the local caching system was implemented on the CDN servers. Web and multimedia content of various types and sizes were selected and uploaded, including videos to test caching efficiency. To evaluate performance, content access requests were generated using traffic simulation tools. During this phase, a significant improvement in page load times and response times was observed, primarily attributable to the reduction in latency thanks to local caching and the fiber network. Furthermore, the traffic generated towards the origin server was measured, which was notably reduced, leading to less congestion on the external network.
- **800G & Hologram (Huawei)**: Open Fiber, in collaboration with Huawei, has conducted a major trial to test ultra-high bandwidth transmission capacity using DWDM (Dense Wavelength Division Multiplexing) technology, implementing a closed-loop connection between the Open Factory laboratory and the Naples PoP (Point of Presence), for a total length of approximately 630 km. This connection served as the main transmission channel to test data transport capacity at a record speed of 800 Gigabits per second. The primary objective of this trial was to simulate data transmission over a geographical distance equivalent to that between Rome and Milan, testing the capacity to transport large

110 Fixed Wireless Access.

amounts of information in real time. The trial tested a cutting-edge application for holographic transmission, capable of generating high-quality, realistic three-dimensional images that are visible and interactive in real time. In this scenario, the network breaks down the relevance of physical distance, paving the way for immersive experiences that redefine critical sectors such as telemedicine, advanced training, and professional telepresence, while simultaneously reducing the need for physical travel.

- Open Fiber has achieved a digital connection of **81.6 Terabits per second** (Tbps) across the Strait of Messina, marking a significant technological advancement for Italian telecommunications. The test, carried out on the national transport network, utilised **34 channels of 2.4 Tbps** on a single optical fiber, demonstrating the possibility of transporting enormous amounts of data with greater energy efficiency and a reduced need for equipment. This innovation allows for a revision of the network architecture and represents a crucial step for ultra-high-capacity digital services, with direct benefits for Sicily, which is already extensively covered by the fiber network.
- **Disaggregated OLT:** a new disaggregated access network architecture was tested using a new OLT (Optical Line Termination) platform, with the aim of evaluating a more flexible, efficient, and scalable network infrastructure. The disaggregated OLT solution features a "leaf & spine" configuration, where OLT modules are interconnected in a tree structure with an aggregation switch, managed by a controller node.
- **Tool Niin (Natural Interface Integration)**: a Data Centre Management tool aimed at the efficient management of the Open Factory data centre, providing a clear and detailed view of resources, ensuring capacity optimisation and a reduction in downtime. The tool is designed to manage and monitor the active and passive resources of the data centre, identify and visualise connections between various devices, plan capacity based on current and future needs, and identify resources not only physically but also in a logical and virtual manner to promptly resolve inactivity issues through clear indicators and metrics.

5.3 PARTNERSHIPS FOR INNOVATION

Collaborations with the world of research

The consolidation of strategic partnerships with excellence from the academic and research worlds grants Open Fiber a leading role in the Italian digital transformation ecosystem. This commitment takes shape through support for high-level training programmes aimed at mapping out tomorrow's technological frontiers. Notable initiatives include the collaboration with the **University of Naples Federico II** for the PhD in "Integrated Photonic Circuits for Passive Optical Networks" and the contribution to the PhD programme in "Urban and Regional Development" at the Energy Department (DENERG) of the **Polytechnic University of Turin**.

Open Fiber and Telespazio

With the aim of guaranteeing the right to connectivity in every corner of the country, Open Fiber has entered into an agreement with **Telespazio**, a European leader in satellite solutions, to reach the most isolated districts and geographically inaccessible areas of the national territory, where optical fiber faces physical laying limitations.

The **STTH (Satellite To The Home) satellite connection** is a complementary solution to Open Fiber's offering and represents an alternative opportunity to cable locations that would otherwise remain without connectivity. Furthermore, thanks to the upcoming VHTS (Very High Throughput Satellites), it will be possible to achieve even higher performance, following market evolution and customer needs.

This equipment allows for the transmission of the signal via satellite link to an antenna installed and configured at the customer's home and is capable of offering broadband services with performance entirely comparable to terrestrial ones.

5.4 FWA (FIXED WIRELESS ACCESS)

Open Fiber is providing continuity to the FWA (Fixed Wireless Access) plan in C&D areas and AGF (Funded Grey Areas) in accordance with Infratel tenders, using licensed millimetre-wave frequency bands at 26 and 28 GHz. In 2025, FWA technological development continued with the release of an innovative solution to guarantee a maximum access speed of 1 Gbps per customer up to a distance of 6km, by efficiently using the radio spectrum (carrier aggregation and the use of mixed H/V polarisation per sector) and thus ensuring reduced energy consumption, both at the FWA radio site and at the customer's home terminal.



5.5 SMART CITY

Global urbanization represents one of the most complex challenges of the century, a phenomenon that has impacted the quality of life and services with over half of the world's population concentrated in urban hubs, the engines of economic growth. In this scenario, the **Smart City** responds to the need to improve resource management for the well-being of its citizens. Through the intelligent integration of networks and services, cities evolve into efficient and livable ecosystems where technology is at the service of collective well-being. This model is based on the synergy of four interconnected pillars: solid **infrastructure**, widespread **sensing**, service delivery **platforms**, and **advanced solutions**.

In order to increase safety and efficiency for people, while always keeping eco-sustainability and environmental protection in mind, the mere presence of infrastructure is no longer sufficient; a system of sensors is necessary to analyze citizen activities – from traffic to video surveillance – to then provide the best available service through dedicated platforms. This interactive automation system can come to life thanks to the Internet of Things (IoT). Since the digital architecture of Smart Cities – based on the interconnection between infrastructure, services, and communication platforms with citizens – relies entirely on the Internet, an infrastructure capable of managing the massive data traffic generated simultaneously by millions of devices and sensors is required. In this sense, **FTTH**

INTERNET OF THINGS

One of the most powerful technologies for the digital transformation of cities, increasingly enabled by optical fiber, is the **Internet of Things** (IoT). IoT is a system of sensors applied to objects and connected to the Internet that will have an increasingly significant impact on public services and will enable the generation of new governance and revenue models. By developing innovative and personalized services in areas such as mobility, public lighting, and beyond, the Internet of Things aims to improve the quality of life for users. Smart Cities use IoT to collect real-time data in order to understand how the demands and needs of citizens are changing and to respond with faster, more functional, and more cost-effective solutions.

technology is able to guarantee the reliability and scalability necessary for the functioning of smart cities.

Thanks to Open Fiber's optical fiber, a series of innovative digital solutions can be enabled, such as:

- the rapid identification of **events harmful to public order** (brawls, facial recognition of criminals and/or missing persons, identification of abandoned objects, etc.);
- the reduction of time spent searching for **parking** and the **easing of traffic congestion** thanks to intelligent real-time reporting of available parking spaces and the installation of smart traffic lights;
- **the reduction of electricity consumption** thanks to smart lighting poles capable of reducing light intensity when no vehicles or pedestrians are present;
- **the optimization of road maintenance services** by concentrating interventions (street/sidewalk cleaning, asphalt maintenance, etc.) where they are most needed; **the increased efficiency of urban waste management services**, by programming waste collection interventions in an optimized manner and identifying negligent behavior (for example, the dumping of waste outside collection areas).

MUNICIPALITY OF SERMIDE AND FELONICA

Open Fiber has presented to the Municipality of Sermide and Felonica the project for the optical fiber connection of the **video surveillance** system that the Municipality will adopt. Video surveillance is the most requested use case by municipal administrations within the Smart City framework, and Open Fiber's optical fiber plays a central role both for the **performance** it guarantees to the video surveillance system and image processing, and for its **capillarity** across the territory.

5.6 NOT ONLY SMART CITIES, BUT ALSO DIGITAL HAMLETS

Open Fiber's mission extends beyond the borders of large metropolises to embrace the **villages of the future**: guardians of traditions, culture, and national identity. Since a "universal smart city" model does not exist, the company promotes tailored digitalization paths capable of enhancing the specific characteristics of less urbanized territories. In this vision, optical fiber can accelerate the growth of major centers while simultaneously enabling progress for smaller communities. The capillarity of the FTTH network thus becomes a flywheel for the country's digital economy, allowing for the deployment of personalized smart services that respond to the actual needs of local communities.

The ideal candidate to become Italy's first ***Borgo Digitale*** (Digital Hamlet) was Pitigliano, a small town situated in a strategic position in the Tuscan Maremma, rich in history and immersed in nature. The Municipality boasts two of the most prestigious national recognitions: it is included in the list of the "Most Beautiful Villages in Italy" and has been awarded the Orange Flag for the 2021-2023 three-year period. Its history began in the Neolithic period, of which it preserves several testimonies, but even more evocative are the traces left by history in subsequent centuries. The ancient "*vie cave*" (excavated roads), the necropolises, the Medici Aqueduct, and a 16th century synagogue are just some of the most noteworthy.

The objective of the project was to promote the development of the village from a digital perspective to implement public utility services, for both the Municipality and its citizens, taking into account the local context and its specific characteristics. A fundamental prerequisite for carrying out this project is the installation of FTTH (Fiber To The Home) optical fiber, implemented by Open Fiber as a Concessionaire of Infratel Italia.

The initiatives introduced cover a wide range of activities, from the use of augmented reality to enhance cultural heritage to the application of

OPEN FIBER AWARDED BY THE POLITECNICO DI MILANO OBSERVATORY

In May 2025, Open Fiber won the "Smart City 2025" award for the digitalization of management processes for infrastructures, services, and urban territorial contexts from the Politecnico di Milano "Smart City" Observatory, thanks to the "Open-air laboratory for the development of digital villages" project implemented in Pitigliano. This award was a recognition of Open Fiber's investment in the territory and the creation of an innovative model capable of offering concrete development opportunities for Italian villages, bridging our country's digital divide.
The Project, promoted and developed together with ENEA with the scientific support of INGV (National Institute of Geophysics and Volcanology), in collaboration with a series of leading companies in the digital innovation sector, was created to guide small municipalities in the digitalization of management processes for infrastructures, services, and territories.

ENEA's **PELL (Public Energy Living Lab)** project in schools, hospitals, and public lighting systems. Alongside these are the development of **edge computing**, **energy efficiency** interventions, **fiber sensing**, **Fiber To The Room (FTTR)**, the **Internet of Things**, and a feasibility study for the creation of an **energy community**.

Of particular relevance, considering the tuffaceous nature of the terrain, was the trial of an advanced **land monitoring system**, carried out with the support of the **National Institute of Geophysics and Volcanology (INGV)**. This innovative project utilised the optical fiber laid by Open Fiber as a distributed sensor, allowing for widespread and real-time monitoring of the geological and structural conditions of the area. The main challenge was to develop digital services and technologies capable of being replicated in other Italian municipalities with similar characteristics, fostering their digital transition while simultaneously enhancing the specific features of the territorial context and identifying and promoting a minimum standard of innovation for small towns and hamlets.

Through the adoption of the "Urban check-up model" – a cutting-edge methodology developed by ENEA in collaboration with the Smarter Interdepartmental Research Centre of the University of Insubria – it was possible to outline a minimum standard of innovation for municipal realities. This model allows for the precise mapping of the level of digitalization required for each Municipality, calibrating technological objectives based on specific territorial identities and peculiarities.

Among the services that can be enabled are:

- **Smart Working and remote activities**, resulting in a reduction of impacts on the environment and the community;
- **E-Mobility**, to reduce the time spent searching for parking and ease traffic congestion by managing tourist flows in real time;
- **Telemedicine**, providing the infrastructure for continuous patient tele-monitoring to support the transmission of high-resolution data;
- **Education**, to facilitate distance learning and the digitalization of schools, with the aim of protecting the right to education and reducing the gap linked to existing infrastructural differences;
- **Energy efficiency** thanks to smart lighting systems;
- **Territorial monitoring** through **Fiber Sensing**, which uses optical fiber as both a transducer and a means of information transport;
- **Security**, through the monitoring of flows.

The evolution of the "smart" hamlet demonstrates how FTTH infrastructure is the necessary condition for fair and inclusive growth capable of reducing the digital divide – an objective that Open Fiber has pursued with determination since its inception. Above all, access to advanced digital services fosters the resilience of small communities, counteracting the exodus toward metropolises and rebalancing the relationship between urban centers and rural areas.

OPEN BLUE SKY IN PITIGLIANO

The "Open-air laboratory" project developed in Pitigliano was presented by ENEA at the workshop "Towards a sustainable Clean Energy Transition in Cities: technical and societal perspectives", held at the Austrian Institute of Technology (AIT) in Vienna, as "**Achieving Holistic Energy, Digital and Resilience Transition in Villages and Small Cities: The Open Blue-Sky Lab in Pitigliano, Tuscany (Italy)**".

The project was also included in the scientific publication "Urban transition - technologies for smart cities and digitalisation" (Dossier 2 Urban Transition 2025), edited by ENEA, which collects and reworks the contributions presented during the conference "**Research Alliances for Climate-Neutral, Sustainable and Equitable Urban Communities**" promoted and coordinated by ENEA, CNR, and UERA. This event brought together experts from the world of research, institutions, industry, and civil society. The topics addressed include: **circular economy, regenerative agriculture, smart cities, renewable energy integration**, and **energy communities**, highlighting the contribution made to the creation of climate-neutral and sustainable communities.

SMART AND SUSTAINABLE CITIES

Within the framework of European strategies for Smart Cities and energy transition, Open Fiber participates alongside ENEA in the UNI technical committee for the drafting of a new standard regarding "**Smart and sustainable cities: intelligent and digitalised energy system for sustainable cities: positive energy districts and energy communities**" aimed at public administrations, designers, energy sector operators, and urban stakeholders.
The new **UNI 1614759** standard, currently under development, outlines the methodological and conceptual framework for the design and management of smart and digitalised urban energy systems. At the heart of the standard lies the integration between energy infrastructures, digital technologies, and evolved organisational models. Particular emphasis is placed on positive energy districts and energy communities, which are strategic for decarbonisation, efficiency, urban resilience, and the active involvement of users.

In the digital hamlet, **Edge Computing** handles data collection and processing directly on-site within the platform, ensuring minimal latency - essential for rapid response times and for reducing traffic within the core network. Should it be necessary to transfer data to a cloud for comparison with other databases (Edge Node or core cloud), these can be transmitted over Open Fiber's network via a dedicated channel with a guaranteed bandwidth of 10 Gb.
Furthermore, the municipal data room has been completely renovated and equipped with two new cabinets: one housing the network equipment already owned by the Municipality of Pitigliano and one provided directly by Open Fiber, containing all pre-configured devices included in the solution. A high-capacity Nutanix server has been installed for the partners developing applications for all planned use cases; if necessary, this can be expanded with additional hard disks to allow for greater data storage capacity.

#GOODSTORIES

Bringing Digital to Villages, Starting from the Communities – UNPLI Agreement

Open Fiber and UNPLI (National Union of Pro Loco Associations) have chosen to bring digital sustainability into **Italian hamlets** by signing, in May 2025, an agreement to promote the spread of ultra-broadband in these territories.
UNPLI, which represents **6,300 Italian Pro Loco** associations located in as many Municipalities, becomes a **significant player** in the digital transition process thanks to this agreement.
The objective of the agreement is also to **train and inform the Pro Loco associations about the advantages of fiber**. In this way, the aim is to facilitate citizens' access to the optical fiber infrastructure.

EDC RACK CABINET

The new Open Fiber EDC RACK Cabinet has been designed with a high level of energy and climate security, through the inclusion of an IoT system already in use in Open Fiber buildings. This system is capable of providing real-time data on the power consumption of the equipment within the EDC solution, monitoring the temperatures of individual cabinets, issuing commands, and receiving alarms.
The Open Fiber cabinet is powered by a dedicated electrical line installed by the Municipality of Pitigliano. In fact, the project also involves the implementation of advanced systems for the monitoring and control of energy and public lighting plants.

5.7 SMART GRID

Smart Grid projects generate a genuine technological leap in the management of electrical infrastructure, acting on two fundamental levers. Firstly, the introduction of remote **monitoring**, **actuation**, and **automation systems** on individual substations optimises energy distribution, drastically reducing network service interruptions. In parallel, the transformation towards **"intelligent" networks** moves beyond the centralised generation model in favour of a distributed and capillary system. This system allows for an increase in the grid's capacity to host and integrate further distributed generation points from renewable sources, enhancing even small-scale point productions and creating a single national nervous system that connects production points and points of use.
Open Fiber is involved in the optical fiber connection of E-Distribuzione's secondary and primary substations with the aim of evolving the national electricity grid, enabling new functionalities for the benefit of both those accessing the grid and the actors involved in managing the electrical system. Following this path facilitates the acceleration of the energy transition process. The **DSO 4.0 – Digital Network** project involves the creation of a communication system of maximum reliability and resilience at the service of the E-Distribuzione network, making it possible to implement new functionalities that significantly improve network performance. In addition to the planned connection of approximately 30,000 electrical substations in the first phase, the installation of newly designed technological components and sensors is also planned. These, together with structural interventions, will contribute to improving the quality of the electricity service and the technological evolution of the E-Distribuzione network, in line with the forecasts and scenarios outlined by the Integrated National Energy and Climate Plan (PNIEC). The project will allow for:

- benefit from a highly reliable and resilient "always-on" communication system to support the distribution network;
- improve technical performance and service quality through advanced automation (smart fault selection), the effectiveness of which will be maximised by using optical fiber as a communication carrier and by utilising physical parameter data (Big Data analytics) from sensors installed in the substations for fault prevention and maintenance;
- ncrease operational efficiency by enhancing the degree of remote control over the network, thanks to new communication systems and advanced sensing equipment installed in the substations;
- increase hosting capacity for the distributed generation of electricity from renewable sources through grid reinforcement interventions;
- monitor real-time production from renewable sources connected to the MV-LV (Medium Voltage-Low Voltage) network.

Open Fiber has also signed a Memorandum of Understanding with **Italgas** aimed at exploring innovative synergies between the optical fiber network and gas infrastructure. At the heart of this collaboration lies the digitalisation of the energy network through cutting-edge technologies such as **Fiber sensing** to monitor critical parameters – such as pressure variations, temperature, and vibrations – and to accelerate the evolution towards increasingly smart and efficient networks.

5.8 FIBER SENSING

The optical fiber infrastructure is evolving into a high-precision geotechnical and environmental monitoring platform. Thanks to the integration of advanced optical systems, the network is transformed into a distributed sensor capable of monitoring the status of civil infrastructure and the territory in real time. This technology leverages the pervasiveness of the metropolitan network to promptly detect thermal or mechanical disturbances, offering a protection tool for urban and regional areas.

The main use cases for fiber sensing are:

1. **Network health monitoring**: complementary to conventional OTDR techniques, this activity focuses on damage prevention and early warning for faults or intrusions.
2. **Detection of catastrophic events**: distributed optical fiber networks can detect seismic waves or anomalies in real time, contributing to the monitoring of earthquakes or other natural events.
3. **Surveillance of civil infrastructure**: monitoring bridges, viaducts, tunnels, embankments, and trenches to prevent structural failures or damages.
4. **Geomonitoring**: continuous control of landslides, riverbanks, and the geological state of the land to mitigate risks associated with landslides or erosions.
5. **Anti-intrusion**: using the fiber as an anti-intrusion system, for example, for street cabinets, power stations, etc.

5.8.1 MEGLIO PROJECT

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) at the end of 2021. This is an experimental project based on a **fiber sensing system for detecting earthquakes** across the national territory, thanks to the optical fiber that the Company is deploying throughout Italy. Through this project, INGV can optimise its measurements, reaching areas where conventional sensors cannot yet be deployed.

In the event of seismic activity, the optical fiber undergoes an almost imperceptible stretching (on the scale of a thousandth of a millimetre) due to the movement of the ground in which the cable is laid. This mechanical action causes a phase shift in the light signal that can be measured with extreme precision. This variation data can be transported even thousands of kilometres away and, once processed, can indicate the exact place of origin, intensity, and other parameters.

The advantages that optical fiber brings compared to traditional point-based detection systems (seismographs positioned in areas considered to be at higher risk) are numerous and concern:

- the considerable pervasiveness of the optical fiber network across the national territory, which becomes a single widespread sensor;
- the speed at which light signals propagate within it, providing valuable real-time information on seismic signals;
- immunity to electromagnetic interference and resistance to a wide range of temperatures (from -100°C to 300°C), high pressures (10,000 psi), and mechanical stress.

The plan involved the design, construction, and installation of ultra-stable laser sensors, used in pairs for each section of fiber, thus ensuring coverage of hundreds of kilometres. The collected data has been made available on a web application interface, with the aim of synthesising it and making it easily accessible. The application allows for the monitoring of seismic activities in the territory adjacent to the identified portion of optical fiber and the analysis of information through a mathematical-statistical artificial intelligence system (machine learning) that guarantees accurate monitoring.

MEGLIO PROJECT TESTING

Two Open Fiber sites in **Ascoli Piceno** and **Teramo** were chosen for the trial – areas identified by INGV as being at high seismic risk – where two ultra-stable lasers (one for each site) designed by INRIM were installed. After an initial on-site data processing phase, the signal transmitted and received by the laser was subsequently sent to Open Fiber's servers via the existing infrastructure as a BEA (Business Ethernet Access) service. To identify seismic events, the data were first analysed and processed through a web application using advanced algorithms such as Artificial Intelligence (AI), and finally examined and validated by INGV. The system was able to detect external disturbances caused by seismic waves both at a global and national level, as well as in the Mediterranean area, identifying earthquakes with magnitudes ranging from 2.6 to 4.1.

This trial demonstrates once again how extensive and capillary optical fiber infrastructure is a useful tool not only for connection and data transport but also for countless technical and scientific applications such as, in this case, earthquake monitoring.

In 2024, the MEGLIO project (Measuring Earthquakes signals Gathered with Laser Interferometry on Optic Fibers) received prestigious recognition for the results achieved in using optical fiber as a sensor for earthquake detection. The Nature group, publisher of some of the most esteemed journals in the international scientific community, published the results of the MEGLIO project on Nature.com and in "Communications Earth & Environment" – its publication for environmental and planetary sciences – passing the scientific community's peer-review for the robustness of the analytical method used, the quality of the research, and the level of innovation.

By integrating sensory capabilities and data transport, monitoring via optical fiber can become strategic for the country's safety, in the prevention and early warning of seismic events or tsunamis.

5.8.2 FAAS: FIBER AS A SENSING

Open Fiber marks the evolution from Fiber Sensing to **Network Sensing** with the **FaaS (Fiber-as-a-Sensing)** project, in collaboration with the **Politecnico di Torino**, **SM Optics**, and **INGV**. The goal is to maximise the use of existing infrastructure for innovative seismic monitoring services, integrating and expanding the MEGLIO project.

Based on a preliminary study and current scientific research, it has been highlighted that certain parameters measurable on optical interfaces[111], are sensitive to physical stresses experienced by the fiber.

Launched in 2023, the project involves the development of Signal Processing algorithms based on AI and Machine Learning capable of processing physical parameters and identifying the cause of the mechanical stress sustained by the fiber. The primary use case will be earthquake detection and monitoring.

At the end of 2024, a PoC (Proof of Concept) was carried out on Open Fiber's live network: specifically, regarding the control and preparation of space and power for the Sensor unit connection, as well as the creation of the IT infrastructure to reach the equipment remotely and transmit the collected data. The first data obtained from the field trials are currently being analysed. Subsequently, software for data processing and the presentation of results will be developed. Since September 2025, a permanent Observatory on the Campi Flegrei has also been active, which, in just

111 Differential Group Delay (DGD), connected with Polarization Mode Dispersion (PMD) and the State of Polarization (SOP).

four months, has detected over 800 seismic events by measuring telluric shifts and comparing interferometric and state-of-polarisation technologies.

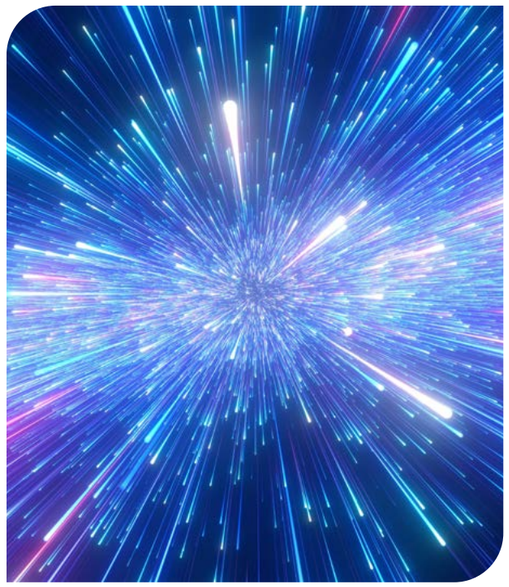
5.8.3 SENSEI

At the end of 2024, Open Fiber, together with other companies and research bodies including INRIM, launched the 36-months[112], R&D project Sensei, funded by the European Horizon Europe programme. The objective is to exploit next-generation photonic technologies to detect strain and vibration in optical cables without interfering with data traffic, enabling new high-value-added services, transforming the optical fiber network into an advanced platform of distributed sensors and making telecommunications infrastructures smarter, more resilient and capable of monitoring the environment in real time. The project also holds strategic value considering the following aspects:

- Network optimisation: continuous monitoring of cable status, with potential evolution towards self-healing networks;
- Safety and prevention: use of fiber as a "distributed seismograph" to detect earthquakes, volcanic activity, and other environmental disturbances;
- Cost reduction: leverages existing infrastructure, avoiding the installation of dedicated physical sensors;
- Research support: generation of environmental datasets useful to the scientific community and civil protection agencies;
- Key technologies: fiber interferometry with low-noise chip-integrated lasers for high-sensitivity measurements; advanced signal analysis algorithms to interpret vibrations and physical variations; intelligent network architecture capable of combining heterogeneous data and providing real-time alerts and analysis;
- Main applications: seismic and volcanic monitoring; continuous environmental surveillance; transmission quality control; civil protection support; large-scale scientific analysis;
- Strengthening the role of telecommunications as a pillar of territorial monitoring activities and national security.

5.9 RESEARCH AND INNOVATION THROUGH THE PROGRAMME RESTART

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 NRRP[113].



The programme involved **27 partners**[114] and, thanks to the opening of cascade calls, another 67 new partners joined, including 29 Universities, two research centres, and 36 operators/vendors. A new feature introduced in the second year of the programme was the "RESTART Grand Challenges": interdisciplinary discussion tables among the programme partners dedicated to the main research challenges for the telecommunications of the future. Open Fiber, through the projects it is developing, has joined the following Grand Challenges:

1. **Grand Challenge 0**: To create a vision for the future evolution of telecommunications in Italy by analysing the economic and technological transformations necessary for the continuous innovation of networks, involving all programme projects to integrate their respective research results.
2. **Grand Challenge 7**: Digitalising the environment for a more sustainable world through interconnectivity and machine learning. The projects involved are: PESCO, Sensing Net, and TeleSmEg.
3. **Grand Challenge 10**: Making the network a programmable platform for executing applications, aimed at developing a network of IoT devices capable of acquiring and sharing data in real time. The projects involved are: Rigoletto and PESCO.
4. **Grand Challenge 11**: Perceiving and protecting the world through communication signals, where fiber sensing is the core technology. The project involved is: Sensing Net.
5. **Grand Challenge 12**: Making artificial intelligence distributed and integrated into the network, leveraging Open Fiber's infrastructure to run distributed machine learning algorithms in the Edge cloud, as close as possible to the end user. This approach enables low-latency intelligent applications and optimises telecommunication network performance, making the sensing, decision, and control cycle more autonomous and efficient. The project involved is: PESCO.
6. **Grand Challenge 18**: Building the highways of the future with fiber communications; Open Fiber is contributing with the telco network switch-off. The projects involved are: Rigoletto, GrapHICS, and Sensing Net.
7. **Grand Challenge 19**: Creating a community for open data and RESTART open-source software, involving all programme projects to define strategies capable of engaging relevant communities, both within and outside RESTART, while measuring the impact of open-source and open-data products.

The **RESTART** research programme outlines the evolution of telecommunications in Italy in full synergy with the strategic directives of the European *Horizon Europe*[115] and *Digital Europe*[116] programmes. Through this programme, Open Fiber oversees the frontiers of technological innovation, contributing to the development of network architectures towards **6G**, the integration of **distributed Clouds**, and network optimisation using **Artificial Intelligence**. This commitment extends to programmable hardware and integrated optics, defining a path of excellence in the field of photonics and sensing.
Through RESTART, Open Fiber is a partner in the most significant R&D programme ever developed in Italy within the telecommunications sector, featuring collaborations with leading national universities and research centres, as well as the major Italian TLC companies.

112 The project will end on 30th December 2027.

113 Mission 4, Component 2 "From research to business", Investment 1.3 "Partnerships extended to universities, research centres, companies for the financing of basic research projects" funded by the European Union NextGenerationEU, theme 14 "Telecommunications of the future".

114 Open Fiber, the University of Rome Tor Vergata, the National Research Council (CNR), the Polytechnic University of Bari, the Polytechnic University of Milan, the Polytechnic University of Turin, the Sant'Anna School of Advanced Studies in Pisa, the University of Bologna, the University of Catania, the University of Florence, the University of Naples Federico II, the University of Padua, the University of Reggio Calabria, the University of Rome Sapienza, the National Inter-University Consortium for Telecommunications (CNIT), the Ugo Bordoni Foundation, TIM, Vodafone, WINDTRE, Ericsson, Prysmian, Italtel, Leonardo, Athonet, Tiesse, Fibercop, and Telespazio.

115 European Union Framework Programme for Research and Innovation for the period 2021-2027.

116 European Union funding programme centred on the introduction of digital technology to businesses, citizens and Public Administrations.

The programme organisation

RESTART is a three-year programme, running from 2023 to 2026, and includes 25 projects and seven missions covering not only scientific research projects through the development of new technologies, services and network architectures, but also challenging objectives (Missions) such as: education & training, increasing the number of students, PhD Programmes, creating new start-ups, technology transfer, setting up laboratories, Proof of Concept (PoC), demonstrators, reducing the gender and North-South divides in the TLC sector.

Open Fiber commitment

Open Fiber is part of the RESTART Foundation[117], which oversees 8 spokes represented by coordination centres, participating in **six projects** aimed at developing new services, architectural solutions, and strategic technologies in line with the company's commitments to sustainability, technological innovation, and environmental protection.

- **Rigoletto**[118]: structural project focused on communication security through the use of quantum technology. Open Fiber will contribute to the definition of network architectures and applicable Quantum Key Distribution (QKD) scenarios within the telco network, and will participate in demo activities for QKD and fiber sensing technologies by providing its existing optical fiber network and know-how.
  The Rigoletto project aims to develop a highly energy-efficient optical network, integrating next-generation optical devices and an innovative data plane. The infrastructure aims to enhance transmission capacity through technologies such as MultiBand (MB) and Space Division Multiplexing (SDM)[119], supporting wireless access and ensuring maximum security through Quantum Key Distribution (QKD). The project also includes an advanced platform for data monitoring and an Artificial Intelligence-assisted network framework.
  In the second year, Open Fiber continued the work across various Work Packages (WP)[120] deepening the study of protocols and the integration of QKD technology into Wavelength Division Multiplexing, and launched the development of telemetry solutions for **Network Sensing** with new strategic partners. Finally, preliminary DEMO activities on QKD technology were organised using the already installed infrastructure.
  Open Fiber also took part in the ECOC 2024[121] conference held on 26th September 2024 in Frankfurt, speaking at the Talk on Symposium "What's next in optical networking".
- **PESCO**[122]: this is a structural project focused on User-centric Pervasive Internet and edge computing architectures. Within this scope, Open Fiber is responsible for the hardware and software infrastructure to be integrated into its own optical fiber network and that of the use cases. The plan involves the development of IoT and edge computing technologies, as well as the foundations and technological enablers for a future of pervasive Internet, proposing new communication paradigms and localised data management. One of the objectives is also to provide a reference architecture for pervasive Internet and evaluate its performance. The project results will be linked to global scientific and technological development programmes. In 2025, Open Fiber focused its efforts on building the Data Edger prototypes made available to all PESCO partners with exclusive access, for the performance evaluation phase and testing of the hardware and software components defined during the design phase.
- **Net4Future**[123]: this is a structural project aimed at fostering a new regulatory framework to incentivise innovation through the definition of new network architectures, the enhancement of technological solutions for the development of inclusive and sustainable infrastructure, and the implementation of advanced digital services. Net4Future has taken on the coordination of Grand Challenge 0: as part of the initiative, research is underway to define the future of telecommunications through a careful analysis of the economic and technological transformations necessary for this to occur. The work carried out in the project is based on high synergy with other RESTART projects, whose results are collected and processed by Net4Future to develop an overall vision. As Project Leader of WP2 "Architecture and requirements of future inclusive and sustainable networks", Open Fiber leads the research on architectures and requirements for the networks of the future. The activities conducted include: analysis of the digital market context; a study on network architectures, regulatory models, competitive challenges, and European best practices to support the switch-off of legacy networks in Italy; the definition of a new business model for TLC operators; and the analysis of economic segments that can be transformed and benefit fully from the digital revolution. Furthermore, Open Fiber has actively collaborated with the company Skopìa within the working group dedicated to implementing the Strategic Foresight methodology, contributing to the definition of the report "The future of telecommunications in Italy to 2050".
  In 2025, Open Fiber launched a new line of research in partnership with the University of Turin, focusing on the analysis of telecommunications network resilience during specific occasions (such as sporting events or adverse weather conditions). The research utilised a predictive model based on monitoring traffic produced on Open Fiber's networks to empirically validate network resilience against current and future traffic demands, highlighting the importance of planning new investments to ensure the rollout of a wide range of services that will require increasing traffic availability in the coming years.

QUANTUM KEY DISTRIBUTION

With the arrival of quantum computing and the current cryptography techniques, the possibility of violating computer security keys is increasing exponentially.
Optical fiber is ideal for applying a new technique for distributing security keys on a quantum basis, the purpose of which is to make it impossible to violate them and, consequently, to make data transmissions practically inaccessible. **Reliability, security** and **key rate** are parameters are fundamental for the definition of a communication protocol. Instead of storing information using bits represented by 0 or 1 as conventional digital computers do, quantum computers use quantum bits to encode information as 0, 1 or both at the same time. This superposition of states, together with the other quantum mechanical phenomena of entanglement and tunneling, allows quantum computers to manipulate huge combinations of states simultaneously.
The exponential growth in computing power is destined to revolutionise a wide range of areas and applications, such as healthcare (research, diagnostics, treatment), finance (high-frequency automated trading, fraud detection), marketing, meteorology, and logistics.

117 The implementing body, the hub of the Research and Innovation Programme, and the body responsible for the launch, full implementation and management of the Innovation Ecosystem Research and Innovation Programme.

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

119 A technique used to increase the capacity of a communication system by using multiple physical channels to convey data simultaneously.

120 Unit of work within a project or set of specific activities that are used to achieve a specific goal. They are usually numbered, for example WP2, WP3 etc.

121 Europe's leading conference on optical communications.

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

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

SCHOLARSHIPS IN SUPPORT OF SKILLS

The promotion and strengthening of high-level training and doctoral-level post-graduate specialisation support the Graphics project; for instance, the PhD scholarship on the study of "Integrated Photonic Circuits for Passive Optical Networks". This aims to develop an active optical switch for use in optical fiber networks with remote control to replace the PFS (Secondary Flexibility Point).
Launched in 2023, with an expected duration of three years (2023–2026), the scholarship was offered to students of the PhD course in Information Technology and Electrical Engineering (ITEE) at the University of Naples Federico II. It is co-funded by Open Fiber, testifying to the intention to bridge the gap between the world of research and the corporate world.

- **Sensing Net**: this is a focused project coordinated by Open Fiber, in collaboration with industrial partners and universities, which aims to develop fiber sensing services for seismic monitoring and to deploy diagnostics and surveillance in urban and regional scenarios, leveraging existing network infrastructures. In 2024, the Company explored the integration of optical sensing and telecommunication signals within fiber networks, focusing on theoretical/simulative and experimental approaches. All preliminary experiments yielded promising results, published in joint papers during the ICTON 2024[124] and ICOP 2024[125] conferences, and were also presented during an invited talk at the Optical Networking Symposium during the ECOC 2024 conference. Two field trials will be conducted – relating to the building monitoring scenario – to test the supervision and localisation of earthquakes, utilising Open Fiber's infrastructure. For the field tests, the Central Apennines area was chosen, as it is considered an area with frequent seismic activity. Open Fiber will participate in the RESTART Plenary Dissemination Workshop on 19th-21st January 2026, where the final results of the project will be presented.
- **Graphics**[126]: this is a focused project aimed at developing a fully optical, remotely programmable active switch with the objective of strengthening industrial competitiveness in the rapidly expanding Fiber-to-the-Home (FTTH) photonic market. It aims to optimise current infrastructures by overcoming the limitations of passive components and making the developed solutions applicable not only to TLC services but also to advanced computing and other technological sectors. Within this scope, Open Fiber is responsible for defining requirements and testing activities. This project will bring several advantages to the PON (Passive Optical Networks) system, including easy network reconfiguration, the transmission of full power to each device, and enhanced data security. In 2025, the Open Fiber team worked alongside all partners on the testbed platform and, thanks to a PhD scholarship focused on the research and simulation of nanometric layers, new resources were recruited who collaborated to finalise the drafting and publication of five scientific papers[127], some presented at the EOSAM conference[128] held in September 2024 whereas others appeared in scientific publications such as IEEE (Institute of Electrical and Electronics Engineers). Open Fiber is currently working on an additional scientific paper[129].
- **TeleSmeg**[130]: the project aims to optimise energy efficiency by integrating Open Fiber's ultra-fast network as an advanced tool for monitoring and controlling consumption. The initiative intends to revolutionise **Smart Grids** by enabling automatic fault detection in electricity distribution, with the goal of increasing the environmental sustainability of the infrastructure. Through remote inspections of operational areas and control of distributed generation with millisecond precision, the system allows for the optimisation of residual energy storage. The initial phase was dedicated to defining use cases and designing a complex architecture aimed at integrating **energy communities** and storage systems into sophisticated operational contexts. During the 2024-2025 biennium, more specific activities were carried out, including the identification of different levels of architecture and data integration within the Smart Grid. The RecOnEdge project complements the functionalities of TeleSmEg with the additional objective of creating a PoC to demonstrate how Artificial Intelligence at the edge can automate Smart Grids integrated with energy communities, renewable energy sources, and energy storage systems. During 2025, a field PoC (Proof of Concept) was conducted in the municipality of Bergamo, focused on the intelligent management of a Renewable Energy Community (REC) – an ideal mix of energy consumers and producers that can be easily extended to different use cases and within the Smart Grid sector. The PoC demonstrated that using a modern high-performance communication network, which combines optical fiber and 5G networks, alongside specially developed AI tools, enables more efficient power grid management by offering the possibility of "near real-time" timely intervention on its component elements.

5.10 DIGITAL TWIN: REALCITY PLATFORM

Real City is Open Fiber's **Digital Twin** system: a software platform that allows for the exploration of a three-dimensional, **navigable and measurable** digital representation of portions of the territory (roads, buildings, and network components). The model is created from **360° images** and **LiDAR** surveys (a laser sensor that measures distances and shapes with high precision) and allows for the **remote observation, measurement, and verification** of the state of the sites where the optical fiber network is designed, built, and managed. The platform is integrated with the **GIS** (Geographical Information System), the cartographic database of network assets, to consistently exchange georeferenced data throughout the infrastructure's life cycle. This innovative tool accelerates the design process, improving its efficiency and sustainability.
Open Fiber is among the first companies in Italy to adopt this technology on a large scale, applying it to an extensive and diversified infrastructure. Real City currently provides:

- more than **3,000** municipalities with Digital Twins;
- over **100,000 km** of **photographic and three-dimensional surveys** acquired to support the platform;
- **1.4 PB** (Petabytes) of data collected.

What it enables:

- **informed design and remote measurements**: distances, dimensions, and technical details can be verified directly within the 3D model, **beforehand** and **without the need for site visits**;

124 International Conference on Transparent Optical Networks.

125 Italian conference on optics and photonics.

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

127 *Design and Simulation of a silicon electro-optic microring switch with a graphene modulating layer; Graphene-boosted ultra-wide band reconfigurable optical switch for SOI-based telecom applications: a numerical study; Single Mode rib waveguide design using Machine Learning techniques.*

128 European Optical Society Annual Meeting.

129 Innovative a-Si:H/c-Si Photonic Structures: Revealing the Potential of Buried Graphene in Telecom Devices.

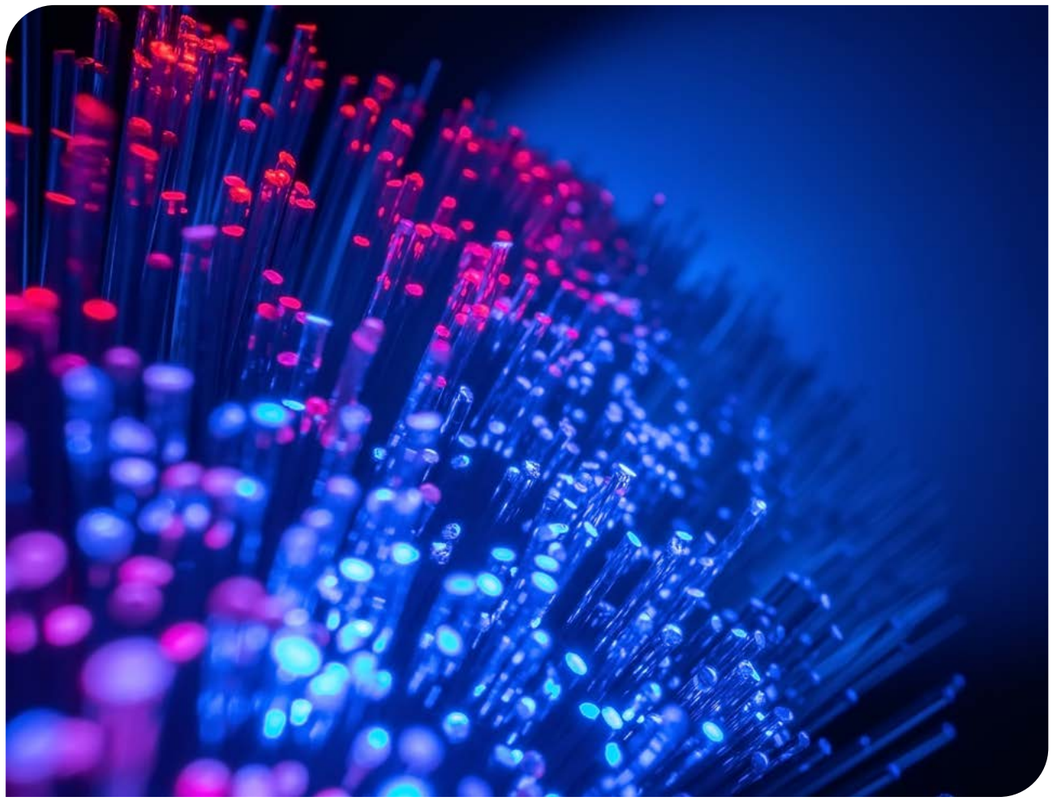
130 Spoke 5, F12: Telecom as a service in the next SMart Energy Grid.

- **quality control and testing**: documentary inspections and progress checks can be performed remotely, integrating evidence with internal systems;
- **alignment with GIS**: the Real City 3D environment and the GIS (Geographical Information System) exchange georeferenced information to ensure consistency between design, construction, and management.

In addition to operational advantages, Real City contributes to **reducing environmental impacts** and improving **occupational safety and quality**:

- **fewer physical site visits**: remote consultation and inspections reduce travel for technicians and contractors, directly benefiting emissions and fuel consumption associated with the survey and monitoring phases;
- **less rework and waste**: designing within an accurate 3D context reduces errors and rework on-site, resulting in **less material waste** and **avoided logistics** (fewer unnecessary supplies, less transport);
- **greater safety for technicians**: fewer entries into high-traffic areas or construction sites.

Real City is a strategic tool for more sustainable infrastructure management, as it allows for the reduction of environmental impacts of activities on the ground and the optimisation of resource use throughout the entire life cycle of the network. Adopting this approach enables more efficient, safe, and responsible processes, contributing to the promotion of network management oriented towards long-term sustainability.

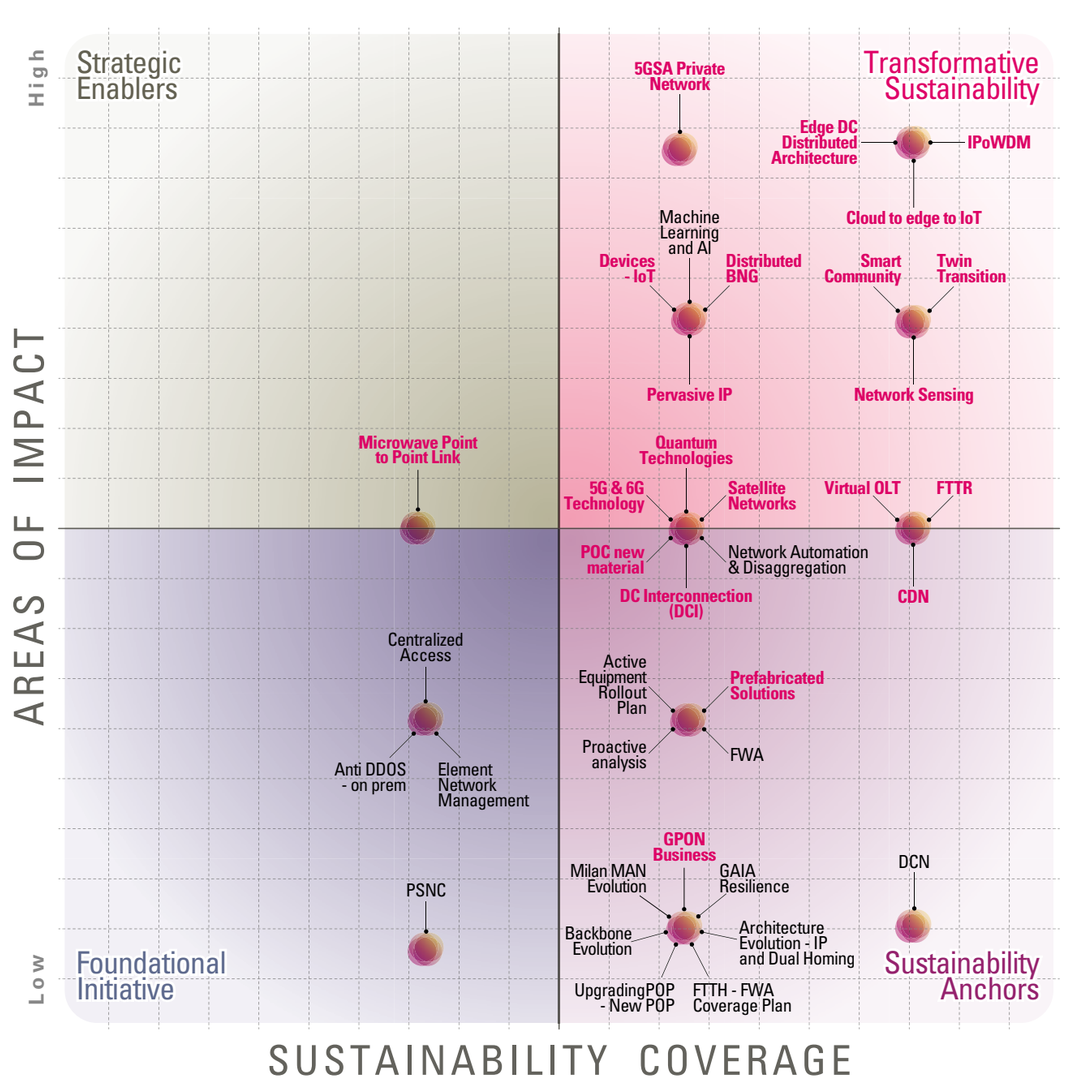


SUSTAINABILITY COVERAGE FRAMEWORK

Starting from 2025, the **Sustainability Coverage Framework** has been included in Open Fiber's Technological Plan, which emphasises sustainable development by reducing environmental impact and improving social impact through the use of four key sustainability indicators covering environmental and social aspects:

- Wholesale Access Solution
- Network Sustainability
- Inclusion & Social Wellbeing
- Technological Evolution of the network

From the analysis of these parameters, Open Fiber is able to calculate a sustainability score for the projects under review. Considering the more than 40 projects present in the Technological Plan, approximately 90% show a positive impact in terms of sustainability.



17 PARTNERSHIPS FOR THE GOALS

8 DECENT WORK AND ECONOMIC GROWTH

12 RESPONSIBLE CONSUMPTION AND PRODUCTION

Governance systems

Sustainable Value Chain

06. GOVERNANCE AND BUSINESS **CONDUCT**

6.1 GOVERNANCE AND CORPORATE ORGANISATION

Innovation and sustainability are no longer simple goals, but the pillars of a transformation that, in addition to closing the country's digital gap and generating shared value, addresses present and future challenges. For Open Fiber, a solid governance system is an essential element of this change. The governance system adopted by Open Fiber is of the ordinary type and includes a Board of Directors[131], responsible for managing the Company, and a Board of Statutory Auditors entrusted with overseeing management. The Company is subject to the direction and coordination of **Open Fiber Holdings S.p.A.**, a company **60% owned by CDP Equity S.p.A.** (a Cassa Depositi e Prestiti Group company) and **40% owned by Fibre Networks Holdings S.c.a.r.l.** (a company belonging to the Macquarie Group).

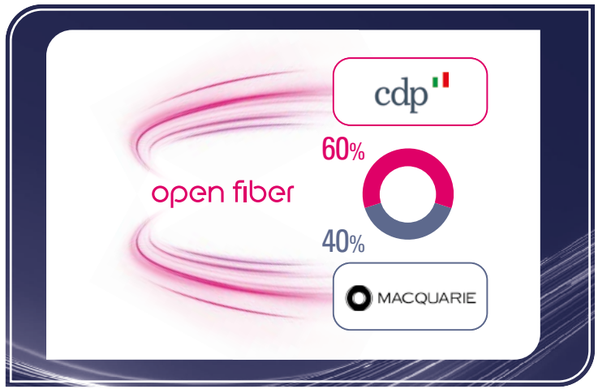


FIGURE 21: COMPOSITION OF THE BOARD OF DIRECTORS AS OF 31 DECEMBER 2025

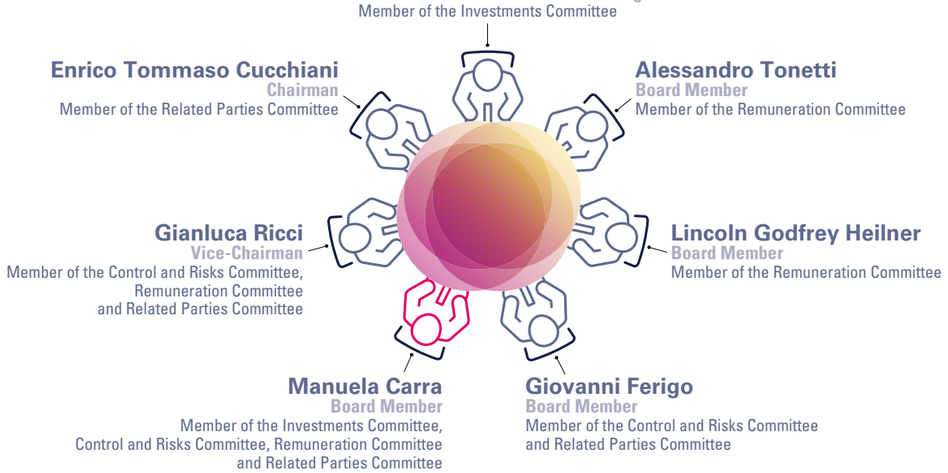
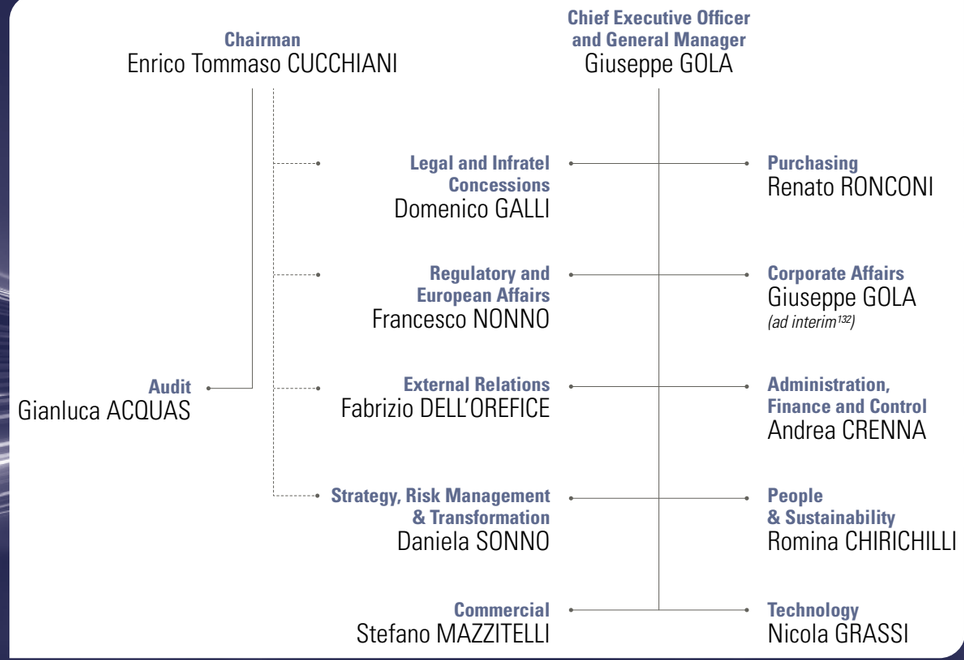


FIGURE 22: ORGANISATION AS OF 31 DECEMBER 2025



In March 2025, the **Commercial Department** was established, merging the activities previously managed by the Business Market and Residential Market Departments[133].

During the year, Open Fiber's internal structure evolved further[134]. In May 2025, the Risk Management & Financial Advisory Department was disbanded, resulting in the transfer of Risk Management activities to the Strategy & Transformation Office Department (renamed **Strategy, Risk Management & Transformation Department**) and the transfer of Security, QHSE, and Sustainability activities to the People Department (renamed **People & Sustainability Department**). Finally, in November 2025, commercial communication activities were transferred from the Commercial Department to the External Relations Department.

The Company's Board of Directors, responsible for defining, implementing, and updating corporate governance rules, approved the "*Procedure regarding the composition, role, and functioning of the Board Committees*"[135]. This procedure is tasked with regulating the composition, operation, and

131 According to the resolution passed by the Shareholders' Meeting on 11 November 2024, the Board of Directors consists of seven members. During 2025, (i) Enrico Tommaso Cucchiani was appointed by co-option by the Board of Directors on 3 June 2025 to replace Paolo Ciocca, the former Chairman of the Board of Directors, and (ii) Lincoln Godfrey Heilner was appointed by co-option by the Board of Directors on 11 September 2025 to replace Peter Mark Horrobin, a former member of the Board of Directors.

132 By organisational provisions dated 07/01/2026, the Corporate Affairs Department was entrusted to Laura Passoni.

133 By organisational provision dated 17/03/2025, the Commercial Department was entrusted to Stefano Mazzitelli.

134 By organisational provisions dated 01/07/2025 and 03/11/2025, the Legal and Infratel Concessions Department was entrusted to Domenico Galli, and the External Relations Department was entrusted to Fabrizio Dell'Orefice.

135 On 3 December 2021.

responsibilities of the **Internal Board Committees** ("Board Committees"), which were established on 22 December 2021 with advisory and consultative functions. These bodies are divided into different categories based on their specific functions:

- **Investment Committee**: tasked with assisting the Board of Directors in assessments relating to the progress of the investment plan compared to the business plan and recommending the adoption of measures to address delays in capital expenditure that Open Fiber may incur, as well as analysing new investments, tenders, and extraordinary transactions[136].
- **Related Parties Committee**: its task is to assess the suitability and benefit of transactions with Related Parties[137]. To this end, the Company – following consultation with the Related Party Transactions Committee and the Board of Directors – adopted, on 22 December 2022, the "*Operating procedure for managing Related Party Transactions*", subsequently updated on 27 October 2025[138]. It is composed of four members, two for each Section of the List from which the directors are elected.
- **Control and Risks Committee**: tasked with assisting the Board of Directors by providing non-binding recommendations for assessments and decisions concerning internal control, the risk management system, and corporate social responsibility[139].
- **Remuneration Committee**: tasked with supporting the Board of Directors, including by issuing binding recommendations, in assessments and decisions concerning the guidelines and criteria of remuneration policies[140].

To better manage and coordinate activity flows and internal procedures, Open Fiber has established several committees and working groups with responsibility for specific issues:

- **Sustainability Committee**: its mission is to assist the Board of Directors, in an advisory and consultative capacity, in assessing ESG (Environmental, Social & Governance) risks and opportunities and in making decisions related to sustainability issues connected to Open Fiber's business, its stakeholder dialogue and engagement activities, and the Company's corporate governance, with the aim of generating shared value in the long term. The Committee is chaired by the Chief Executive Officer and is composed of permanent members (identified within the Departments managing material ESG issues and responsible for actions aimed at improving corporate impacts on these issues), on-call members (identified within the Departments supporting the Committee in specific activities), and corporate sustainability representatives[141]. The main tasks of the Sustainability Committee are:
  - defining the corporate strategy, overseeing and validating the Sustainability Plan, the Net Zero Plan, and the Sustainability Policy to create shared value with all stakeholders in the medium and long term;
  - validating the assessment of risks and opportunities arising from sustainability aspects;
  - verifying the progress of the strategy and monitoring the results achieved against the objectives defined in the Plan;
  - overseeing and validating the Sustainability Report or Sustainability Reporting, including the materiality analysis.

136 For the composition of the Committee, please refer to Figure 21.

137 The term "Related Party" must be interpreted in accordance with Consob Regulation no. 17221/2010.

138 For the composition of the Committee, please refer to Figure 21.

139 For the composition of the Committee, please refer to Figure 21.

140 For the composition of the Committee, please refer to Figure 21.

141 By organisational provision dated 16/05/2025, sustainability activities were merged into the People & Sustainability Department.

FIGURE 23: RESPONSIBILITIES IN THE REALM OF SUSTAINABILITY



- **Access Mechanism Committee**: operates within the supplier qualification process and is responsible for examining applications to join the Access Mechanism. Where there are issues related to compliance with current regulations, it draws on the regulatory support of the Purchasing Department and, where necessary, other relevant corporate Functions/Departments. Once the appropriate assessments have been completed, the Committee resolves on applications for admission, the exclusion of participating operators, and suspensions. It is established within the Purchasing Department and consists of a Chairman, two representatives to be identified within the Purchasing Department and the Technology Department, and a Buyer from the Purchasing Department.
- **Quality & HSE Committee**: it is involved in the Management Review process required by the QHSE Management System, which aims to ensure the monitoring of the suitability, adequacy, and effectiveness of Open Fiber's System. It is composed of the Employer[142], the Delegated Director, the Head of the Security & QHSE Function within the People & Sustainability Department, representatives of the specific HSE Functions within the People & Sustainability Department, and representatives of the Departments/Functions dedicated to Risk Management in the areas of Quality & HSE and Road Safety.
- **Crisis Committee**: the body responsible for strategic direction and coordination, as well as decision-making in the event of an incident or emergency that may generate or has already generated a state of crisis. The Chief Executive Officer is responsible for convening the Crisis Committee, in consultation with the Directors of the areas most impacted by the event. It is composed of the Chief Executive Officer and General Manager and all Directors.
- **Corporate Areas Committee**: the competent body for the assessment and categorisation

142 By resolution of the Board of Directors, the CEO of Open Fiber S.p.A. was identified as Employer pursuant to art. 2 paragraph 1 letter b) of Legislative Decree no. 81 of 9 April 2008 and subsequent amendments and additions.

of Corporate Areas (**Red**: high-security closed areas, requiring specific protection measures for access control, video surveillance, and intrusion detection; **Yellow**: medium-security closed areas, requiring specific protection measures for access control and intrusion detection; **Green**: all other spaces, even if access-controlled). Composed of six representatives from various corporate Departments, the Committee is activated by the representative of the People & Sustainability Department, who appoints a manager for each red and yellow area.

- **Investment and Project Approval Committee**: performs a consultative role within the approval process for new investment plans, tenders, and extraordinary transactions. It is composed of the Chief Executive Officer, the Chief Financial Officer, the Director of the Proposing Corporate Function, the Procurement Director, the Strategy, Risk Management & Transformation Director, the Head of Planning and Control, and potentially all Directors involved in the investment/initiative.
- **Procurement Committee**: plays a key role in the authorisation process for expenses already approved in the Budget/Industrial Plan. It is composed of the Purchasing Director (or their delegate), the Head of Procurement Lines, the Director of the Proposing Corporate Function (or their delegate), the Head of Planning and Control from the Administration, Finance and Control Department and, if necessary, with the potential support of the People & Sustainability Director. Committee members may also convene additional participants depending on the specific nature of the initiative under discussion.
- **Commercial Strategies Committee**: aims to define commercial strategies with a holistic and coordinated approach across all markets, strengthen the Company's competitive positioning, support the achievement of targets set by corporate plans, and acquire competitive advantages in the market, generating value for the Company and its Customers. The committee is led by the Commercial Director and consists of the Strategy, Risk Management & Transformation Director and the Regulatory and European Affairs Director.
- **DE&I Committee**: acts as a guide for the effective adoption and continuous, consistent application of Diversity, Equity & Inclusion (DE&I) policies. It consists of the Chief Executive Officer and General Manager, the People & Sustainability Director, and the DE&I Working Group Representative, on-call members (Departments supporting the Committee in specific activities), and the DE&I Working Group (members with specialist expertise in the DE&I field supporting the Committee).

6.2 ETHICAL BUSINESS CONDUCT

6.2.1 CODE OF ETHICS AND OMM 231

At Open Fiber, technological excellence and awareness of the impact generated on the socio-economic fabric go hand in hand with integrity, responsibility, and transparency. In this context, the adopted **Code of Ethics** is not a mere formal requirement, but a value-based compass guiding every activity to ensure sustainable, inclusive growth oriented towards the wellbeing of the entire community. Although not legally mandatory, this document is a fundamental voluntary tool for defining corporate identity and ensuring ethical and sustainable management: indeed, the Code represents not just a set of guiding principles, but a concrete commitment to all stakeholders involved in Open Fiber's business: employees, collaborators, business partners, institutions, and citizens.

The adoption of this document consolidates a business model founded on **sustainability**, **innovation**, and **responsibility**, helping to generate added value for the community and strengthening the bond of trust between the Company, stakeholders, and the entire sector. The members of the corporate bodies and the Supervisory Body pursuant to Legislative Decree no. 231 of 8 June 2001 (Legislative Decree 231/01), employees, collaborators, consultants, suppliers, and partners who, in any capacity or nature, establish direct or indirect, permanent or temporary relationships with Open Fiber, are strictly required to comply with the Code of Ethics. The document represents one of the pillars of corporate culture, aimed at ensuring respect for ethical principles and meeting stakeholder expectations. By promoting high professional standards, the Code precludes any behaviour in conflict with regulations, values, and the corporate Mission.

In line with the provisions of Legislative Decree no. 231/01, Open Fiber has introduced an **Organisation, Management and Control Model** (hereinafter Model or OMM 231), to protect against administrative liability attributable to the Company. This is a structured and organic internal regulatory system of policies, guidelines, procedures, operating instructions, and control activities, including preventive measures, aimed at mitigating the risk of any type of wrongdoing or offence.



Open Fiber's OMM 231 is designed as a dynamic tool, constantly updated in response to organisational or regulatory developments. The Company monitors its effectiveness through specific audits of control measures, integrating its provisions with the Code of Ethics to ensure full consistency between corporate values and operational compliance[143].

The procedures through which the Company practically implements the provisions of the OMM 231 are:

- verification of corporate conduct, with the potential activation of the disciplinary system provided for by the applicable National Collective Labour Agreements (CCNLs)[144];
- monitoring the functioning of the OMM 231, with subsequent updates where necessary;
- segregation of duties in the structuring of corporate processes and in financial resource management activities;
- definition of policies, procedures, and operating instructions describing the methods and execution of corporate activities, as well as the methods for archiving and preserving documentation;
- definition of a system of powers of attorney and delegations of authority consistent with assigned responsibilities, to formalise management, coordination, and control responsibilities within the Company, including associated hierarchical reporting lines;
- definition and updating of the mapping of the Company's Risk Areas through a Risk Assessment activity;
- assignment of specific supervisory tasks to the Supervisory Body regarding compliance with the principles of the Code of Ethics and the Model, as well as the functioning, effectiveness, and adequacy of the Model and the need for

143 During 2025, a project was launched to update the OMM 231 and the Code of Ethics; the versions currently in force date back to 18/05/2023 and 18 January 2024, respectively.

144 Contratto Collettivo Nazionale di Lavoro (National collective labour agreements).

updates should specific requirements arise;
- transmission of Company information and data, as well as compliance with EU Regulation 679/2016 (GDPR), ensuring their confidentiality.

Corporate success and the quality of the working environment rely on the daily observance of ethical principles. To disseminate these principles and increase the awareness of employees and collaborators, Open Fiber provides ongoing training programmes on the Code of Ethics and the OMM 231, focused on promoting responsible conduct and identifying behaviours or circumstances that may constitute offences covered by the Decree. During 2025, the training modules on the Code of Ethics and OMM 231 were updated and completed by all Open Fiber employees.

Among the offences regulated by Legislative Decree 231/01 is **corruption**: confirming Open Fiber's constant commitment to combating this phenomenon in all its forms, 16 corporate processes have been mapped, each of which can be linked to this offence; no incidents of corruption have been reported over the last three years[145]. The main risks identified are related to the strategic area (e.g. strategy definition and implementation, reputation), financial area (e.g. credit, financing), operational area (e.g. unlawful acts, Health and Safety, IT systems), and external or sector-specific area (e.g. competition, regulatory). To mitigate these risks, Open Fiber has defined specific processes and tools, formalised within the company's regulatory documents[146].

Training content is constantly updated in line with regulatory changes and Model developments. In the event of significant changes, such as the introduction of new types of offences, Open Fiber integrates its educational pathways, ensuring their timely completion by the entire corporate population. Training courses prepared for employees and collaborators in general are mandatory. During the course delivery process, the Company is required to inform the Supervisory Body of the results, acting as a guarantor of participation. Unjustified absence of employees from these training programmes may result in a disciplinary sanction imposed according to the rules set out in the OMM 231.

Responsible human capital management is a factor for success and sustainable growth for Open Fiber. For this reason, through the Code of Ethics and the OMM 231, the Company establishes binding principles for the protection of human rights, defining strict rules against all forms of discrimination, harassment, irregular work, or violations of fundamental human rights. To ensure compliance with the Code of Ethics, the OMM 231, and corporate regulations, Open Fiber provides the **EQS Integrity Line platform**. This **secure and anonymous digital channel** allows employees, suppliers, and any other counterparty of the Company to report – also in accordance with whistleblowing legislation – any violation or suspected wrongdoing that could cause harm or prejudice to the Company. Every report received is managed in full compliance with data protection (GDPR) and ISO-certified high-security hosting. In accordance with Legislative Decree no. 24/2023, Open Fiber provides for reports to be managed by expressly dedicated internal Representatives; furthermore, the Guideline explicitly specifies the various stages of analysis and evaluation of the report (receipt, preliminary examination, investigation and assessment, feedback to the whistleblower, documentation retention, and deletion).

The reporting platform is managed by a third party independent of Open Fiber, thereby guaranteeing the security of the processed data to protect both the whistleblowers and the reported parties. Communications received are taken in charge and promptly managed by the Company, which implements the necessary steps for the verification and analysis phase in compliance with the "Reporting of Irregularities" Guideline. This guideline is available to employees within the document management platform[147], and a specific training "pill" (micro-learning module) is also provided.

On a monthly basis, the **Audit Department** transmits summary data on the reports received, the status of the verifications, and the relative results to the Supervisory Body. Based on these flows, the Body reports semi-annually to top management regarding the activities carried out. In parallel, the Audit function provides Management with periodic reporting on significant reports, highlighting the investigations concluded and the communications managed.

TABLE 3: TABLE CORRELATION BETWEEN OMM 231 AND 2025 MATERIAL TOPICS

OMM 231	Material topics
Occupational Health and Safety	• Responsible value chain management • Own workforce
Handling, money laundering and self-laundering	• Business conduct • Responsible value chain management
Corporate offences and corruption between private individuals	• Business conduct
Offences against the Public Administration	• Business conduct • Privacy and cybersecurity
Environmental offences	• Climate change • Circular economy • Responsible value chain management
Employment of third-country nationals	• Responsible value chain management
Copyright, industry and trade	• Business conduct
IT offences and unlawful data processing	• Privacy and cybersecurity
Offences against individual personality	• Responsible value chain management • Own workforce
Terrorism offences	• Business conduct • Responsible value chain management

6.2.2 RISK CONTROL

Open Fiber's resilience and business continuity rest on an effective **Internal Control and Risk Management System** (**ICRMS**). At the core of corporate governance, the ICRMS integrates rules and organisational structures to identify, monitor, and mitigate corporate risks. This oversight ensures conduct consistent with strategic objectives and secures long-term business stability.

The Board of Directors is the primary actor in the System: holding the responsibility for defining the guidelines, it verifies its adequacy, effectiveness, and correct functioning. Other participants in the ICRMS are: the Control and Risks Committee, the Chairman of the Board of Directors, the Chief Executive Officer, the Board of Statutory Auditors, the Supervisory Body (SB), the Audit Department, and the Second-Level control functions-namely the functions through which the CEO operates for the identification, measurement, management, and monitoring of the main risks.

145 Cases of corruption to the detriment of the Company may be reported in accordance with the "Reporting of Irregularities" Guideline, in compliance with Legislative Decree 24/2023, as well as the adopted audit procedures.

146 The most significant regulatory documents useful for mitigating corruption risk are: the "Relations with the Public Administration and Relevant Private Entities" Guideline, the "Sponsorship Procedure", the "Gifts Procedure", and the "Procedures relevant to procurement, selection, and hiring processes". Furthermore, Open Fiber has adopted the "Reporting of Irregularities" Guideline, the OMM 231, and the audit procedure to prevent, identify, and manage cases of corruption.

147 The channels for receiving reports regulated within the Guideline have been adopted in accordance with the relevant legislation (Legislative Decree 24/2023). Regarding measures aimed at protecting whistleblowers from retaliation, the responsibility for managing reports has been assigned to the Audit Department as an independent department.

The **Control and Risks Committee** is responsible for monitoring the risk identification, assessment and risk management process on behalf of the Board of Directors: the main findings of the risk management activities, the related action plans and the evidence concerning the controls implemented are presented to it.

Inspired by national and international best practices, the ICRMS makes it possible to:

- create value in the medium-to-long term, by calibrating the risk profile against strategic objectives;
- make informed decisions, by promoting a culture of legality and risk management consistent with corporate values.

The ICRMS operates on "three lines of defence": **first-line controls**, performed by individual operating units on their own processes; **second-level controls**, entrusted to specific corporate functions to monitor typical categories of specific risks; and **third-level controls** or internal audit activities, aimed at assessing the adequacy of the ICRMS as a whole.

Following its strategic and operational model, Open Fiber has adopted a reference framework for the regulation of the Internal Control and Risk Management System, inspired by the **"Internal Controls – Integrated Framework" model**[148]. This system is structured into five fundamental components, interconnected and integrated into corporate processes at all organisational levels: Control Environment, Risk Assessment and Management, Control Activities, Information and Communication, and Continuous monitoring of control systems. In order to ensure a comprehensive analysis of all risks the Company may incur, two approaches for the definition, assessment, and measurement of risks have been adopted:

- top-down approach for **Strategic, industrial, and financial Risks**: starting from the inputs of the Strategic Plan and the Industrial Plan, as well as indications from the Management Team, the main risks that could influence the achievement of the set objectives are identified and described, along with their root causes and potential consequences, estimating both economic and non-economic effects. This is followed by a review and consolidation phase;
- bottom-up approach for **Operational Risks**: identifies and prioritises all relevant operational risks for Open Fiber, in order to identify and implement the policies and procedures that oversee the decision-making process in daily operations.

These approaches constitute an essential element for the alignment between corporate objectives and daily operational activities, allowing for the effective integration of strategic, industrial, and financial risks with the related operational risks referring to the organisational structure, and for the adoption of proactive measures in response to market dynamics and new risk scenarios. Particular importance is attributed to sustainability-related risks, known as ESG (Environmental, Social & Governance) risks, which can significantly impact corporate strategies and long-term competitiveness. The analysis carried out has made it possible to identify the main ESG risks, with a focus on those arising from extreme natural events, climate change, business continuity, corrupt practices, and issues relating to occupational health and safety, and the environment[149].

For all those risks assessed as priority and/or critical, the process involves defining an action plan, brought to the attention of the Control and Risks Committee, which highlights the organisational-procedural or process-technological interventions to be implemented. The Company's risk profile is monitored through the verification of Action Plans and the periodic updating of risk assessments, which are communicated regularly to the Governing Bodies. The Control and Risks Committee oversees this process by verifying the implementation of the planned interventions and, through reports, requests any changes to the management strategy, corrective actions, budget, or timelines.

6.2.3 PRIVACY PROTECTION

Open Fiber adopts a Data Privacy Governance model aimed at protecting the data managed within its activities. The system guarantees full regulatory compliance of data processing – both internal and third-party – through control strategies that ensure integrity and confidentiality. By integrating the principles of **Privacy by Design** and **Privacy by Default**, the Company designs every process by minimising the use of data to only the necessary purposes. The oversight structure is completed by the designation of an internal Privacy Liaison and the appointment of a Data Protection Officer (DPO)[150].

An integral and significant part of the adopted model consists of the policies and procedures defined by the Company[151], which are periodically updated to ensure compliance with new legal and regulatory orientations, as well as new provisions from the Data Protection Authority. The processing of data collected and managed by Open Fiber is carried out in accordance with the principle of accountability, in order to comply with the general principles of lawfulness of data processing, correctness and accuracy of the processed data, transparency, and limitation of the purposes of processing and data retention.

6.3 QUALITY, ENVIRONMENT, OCCUPATIONAL HEALTH & SAFETY, AND ROAD SAFETY

6.3.1 INTEGRATED MANAGEMENT SYSTEM

Open Fiber prioritises the protection of the territories in which it operates and the health and safety of all those who, in any capacity and at any level, collaborate to achieve the company's objectives. This commitment translates into the adoption of technologies that respect the environment and the development of an intrinsically high-performance and sustainable infrastructure. The **Integrated Management System (QHSE)** is founded on these principles, and since 2020[152] it has been certified according to the international standards UNI ISO 9001, UNI ISO 45001, and UNI ISO 14001. This model guarantees strict compliance with the objectives declared in the Corporate Policy, ensuring operational excellence and environmental responsibility. This management system was further strengthened during 2025 by integrating road safety management, for which the corresponding UNI ISO 39001 certification was achieved.

The Integrated Management System adopts a strategic approach based on risks and opportunities (**risk-based thinking**[153]) that permeates every phase of corporate processes, considering internal and external factors alongside stakeholder expectations. This approach prevents critical issues and promotes continuous performance improvement, ensuring business continuity and stakeholder satisfaction. Key elements include: accurate contract execution, resource optimisation, operational efficiency,

148 Developed by the Committee of Sponsoring Organisations of the Treadway Commission (COSO Report).

149 For a complete overview, please refer to the Materiality Analysis presented in paragraph 7.2 "Identification of material topics".

150 All employees have been designated as "Persons authorised to process data"; furthermore, System Administrators have been appointed.

151 Policy for the Management of the Data Privacy Governance Model, Management of Data Subjects' Rights, Privacy by Design and Privacy by Default, Management and Notification of Data Breaches and Appointment of System Administrators, Legitimate Interest Assessment, Privacy Audit, Data Retention Policy.

152 The certifications were confirmed during the 2025 Certification Maintenance Audit.

153 Strategic and systemic approach based on risks and opportunities. Among the international standards that in their latest versions adopt risk-based thinking are UNI EN ISO 9001 (Quality Management Systems), UNI EN ISO 14001 (Environmental Management Systems) and UNI ISO 45001 (Occupational Health and Safety Management Systems).

protection of occupational and road health and safety, as well as the ability to adapt to environmental changes, ensuring a balance with the socio-economic context in which the Company operates.

Open Fiber has defined the Quality, Health and Safety, and Environment Policy, which establishes the Company's formal commitment to building relationships of mutual trust with its Customers, guaranteeing safe working conditions, systematically managing road risks, developing and promoting sustainability initiatives and projects, and, finally, protecting the environment in the performance of corporate activities with the aim of reducing pollution levels, supporting the conservation of natural resources, and making their use more efficient. Only with this strategic vision is it possible to work on preventing or mitigating negative impacts. The Policy identifies the values to which the Company, its workers, collaborators, and all those who, in any capacity, on a continuous or occasional basis, contribute to Open Fiber's activities must conform to ensure the achievement of corporate targets, as well as Health, Safety, and Environmental Protection conditions deemed suitable and consistent with the responsible and sustainable growth of the Company.

The System involves all the Company's Departments and Functions, as well as all activities carried out directly by employees and by all those who, in any capacity, operate on behalf of Open Fiber within the processes of Design, Permitting, Installation, Maintenance, and Activation of telecommunications and ultra-broadband optical fiber data transmission network systems, including the marketing of related services[154].

QHSE MANAGEMENT SYSTEM OBJECTIVES

The Policy identifies objectives aimed at ensuring the quality of services offered and customer satisfaction, reducing the environmental impact of activities, and preventing risk situations for workers, including with regard to road risks. Open Fiber is committed to:

- applying the Management System in accordance with international standards;
- complying with compliance obligations through periodic checks and updates of internal and external regulations;
- striving for continuous improvement by setting clear objectives and monitoring results and the satisfaction of customers and workers;
- preventing and managing non-conformities and complaints to improve performance;
- building trust-based relationships with customers by offering reliable and valuable services;
- providing safe working conditions to prevent injuries and occupational diseases;
- managing the company fleet with trained personnel and vehicles equipped with safety devices;
- selecting, using, and decommissioning vehicles in accordance with road safety;
- identifying risks and hazards, taking action to eliminate or reduce them, and planning continuous improvements;
- ensuring the safety of workers and other parties involved, prioritising collective protection measures;
- monitoring accidents and environmental damage, implementing corrective actions and reporting to management;
- adopting a model of clear responsibility and effective tools for intervention;
- keeping key indicators under control;
- conducting periodic audits on the effectiveness of the management system and on the compliance of suppliers and contractors;
- promoting an inclusive work environment that respects the psychological and physical wellbeing of all;
- supporting sustainability projects, both internal and external to the company;
- considering the environment in corporate activities to prevent and mitigate negative impacts;
- assessing risks and opportunities related to climate change within corporate processes;
- training and informing all personnel on occupational and traffic risks, including in emergencies;
- spreading awareness on these themes, encouraging worker participation;
- regularly evaluating suppliers, involving them in the company's objectives;
- collaborating with authorities and associations to ensure commitment and transparency.

154 The certification scope is covered by the certificates of compliance with the standards UNI EN ISO 9001:2015, UNI EN ISO 14001:2015, UNI ISO 45001:2018 and UNI ISO 39001:2016. It should be noted that Open Fiber's Health and Safety Management System covers all employees (according to the figures reported in the GRI 2-7 information) and all those who collaborate with Open Fiber in any capacity in achieving its objectives.

The active involvement of all personnel and all stakeholders is essential for the improvement of the Management System: for this reason, the Company encourages the participation of workers and their representatives in identifying hazards, assessing risks, and defining control measures, encouraging them to propose innovative technical-organisational solutions. Optimal results would not be achieved without an efficient basis for dialogue between managers and collaborators, a key element for understanding personnel needs, thereby contributing to the improvement of the working environment and organisation. All corporate operations and achieved results are subject to periodic verifications through internal audits, aimed at assessing the effectiveness and efficiency of corporate processes, compliance with current regulations, as well as adherence to technical standards and Management System requirements. To progress consistently and coherently, Open Fiber periodically shares performance results with the Management Team (CEO and first-line management) during the Management Review. This procedure allows for the evaluation of the Management System's consistency and effectiveness, the analysis of the current year's performance, and the definition of new strategies and improvement objectives for the future.

6.3.2 CONTROL ACTIVITIES

In addition to monitoring via the Vendor Rating index[155], Open Fiber performs checks on supplier performance regarding services, products, and works in compliance with the provisions of the procurement contracts, consistent with the adopted risk management framework. The suitability of the systems in relation to technical standards and compliance with Open Fiber's processes are verified through three levels of control:

- **compliance checks**: carried out by the Field Manager and the Operational QHSE of the region on behalf of the Regional Manager. These positions verify compliance with contractual obligations and/or those falling within the legal scope of responsibility (ex lege), within the construction sites for the construction of the network. In 2025, approximately 2,000 assessments were carried out, of which around 1,300 were site inspections and over 600 were evaluations of the professionals appointed for site supervision;
- **operational checks**: the purpose is to monitor operations and procedural measures for carrying out compliance control activities. These controls are performed by the Operational HSEQ Operating Unit of the People & Sustainability Department[156] and focus on network construction activities, including through specialised external companies. In 2025, there were approximately 1,600 such controls, including 619 inspections at construction sites, 556 checks for Delivery activities, and 432 checks for Assurance activities;
- **internal system audits**: these are performed by the Operating Unit of the People & Sustainability Department, both through internal personnel and through specialised external personnel. Their objective is to verify compliance with the corporate Management System and its correct implementation, in accordance with ISO 9001, ISO 45001, ISO 14001, and ISO 39001 standards. During 2025, 98 integrated QHSE internal audits were conducted across the national territory within the scope of activities carried out at Network Creation sites, technological sites, for Delivery & Assurance interventions, at corporate offices, and for the organisation's internal processes. The results obtained from the audits confirmed that the Management System is a valuable element in corporate operations in terms of effectiveness and efficiency.

Furthermore, for the purpose of verifying the compliance of work environments, during 2025 the Prevention and Protection Service carried out

155 For a description of the Vendor Rating process, see paragraph 6.5.2 "Periodical Assessment of Suppliers.

156 With organisational arrangement of 20/05/2025, the Operational HSEQ Operating Unit was moved from the Technology Department to the People & Sustainability Department.

over 20 inspections at the Company's offices and over 130 inspections at technological sites located throughout the national territory.

6.4 INFORMATION SECURITY AND BUSINESS CONTINUITY

6.4.1 INFORMATION SECURITY AND BUSINESS CONTINUITY

The ongoing digital transformation, while offering countless opportunities, exposes individuals and organisations to new and growing cyber vulnerabilities. Digital identity – composed of sensitive data and credentials stored in systems – is now a constant target for cybercrime. Phishing attacks, malware, and social engineering aim to breach networks and systems to manipulate or steal information for illicit purposes. In this scenario, **data protection and privacy** emerge as an absolute priority: only by adopting a proactive approach, integrating prevention strategies, rapid response to attacks, and user training, is it possible to guarantee system resilience in an increasingly connected context.

Open Fiber recognises the relevance of these issues: for this reason, in full compliance with its values, it has launched a process of continuous improvement of its **Integrated Management System for Information Security and Business Continuity**. The commitment made aims to strengthen Open Fiber's solid and mature positioning, ensuring the protection of all stakeholders, from customers to employees and collaborators. The Management System, modelled on the UNI EN ISO/IEC 27001[158] and UNI EN ISO 22301[159] standards, ensures continuous performance improvement and the achievement of the objectives declared by specific corporate policies.

The Company has built a robust system for the prevention, monitoring, and response to cyber incidents using procedural and technological countermeasures, alongside constant oversight by specialised personnel dedicated to safeguarding the confidentiality, integrity, and availability of information. In support of these procedures, activities are periodically conducted for the analysis and mitigation of risks related to threats that could impact the business and the operational continuity of the organisation resulting from malicious or accidental events (such as cyber attacks, natural disasters, or human error).

During 2025, Open Fiber passed the maintenance audit for the **UNI EN ISO/IEC 27001 certification**, achieved in 2023. A further step forward for the Company involved improving incident monitoring processes and expanding initiatives aimed at managing the security risk generated by the supply chain by extending the scope of verification for the security posture of suppliers deemed critical to the company's business.

Regarding business continuity, during 2025 Open Fiber improved its Management System by extending the scope of corporate processes subject to **Business Impact Analysis** (BIA) and consolidating the intervention sheets related to typical corporate activity scenarios. Specifically, the BIA was updated to identify and evaluate all of Open Fiber's critical processes, specifying resources, recovery times, and intervention priorities in the event of an emergency. The intervention sheets were revised to optimise operational procedures in case of interruptions, clearly defining the actions to be taken, responsibilities, and communication flows necessary to guarantee a rapid and effective recovery of corporate activities.

These proposals have made it possible to manage risks in a structured manner, in line with the following objectives:

- guaranteeing the service availability levels established in contractual agreements with Customers;
- providing availability of resources to support the infrastructure;
- ensuring the availability and safety of the personnel necessary for the delivery of "mission-critical" business processes;
- guaranteeing compliance with mandatory legal and regulatory requirements applicable to Open Fiber's operational context and, specifically, to the services provided;

CONNECTIVITY BETWEEN SECURITY AND PRIVACY

An **EY survey**[157], conducted on a sample of **1,000 households in Italy** and 20,000 globally, analysed consumer attitudes in the technology, media, and telecommunications sectors, reporting interesting final results.

Fixed connectivity is perceived as somewhat unreliable: a quarter of households report regularly unstable connections, and 35% are considering replacing their fixed network with a mobile one, partly to save money. 42% of Italian households are concerned about the time family members spend online, and 44% sense a negative impact on the digital-life balance. **Digital overload** is widespread; 42% of Italians seek a **digital detox**, reducing their time spent online. Concerns regarding **content security** are growing: 42% of households witness, and 38% directly receive, dangerous content; over 60% fear that children are exposed to it, and 63% are worried about the spread of fake news. 40% of households call for greater intervention from governments and authorities against harmful content. Regarding social platforms, users would like the removal of dangerous content (53%), the blocking of responsible accounts (43%), stricter identity and age verification (39%), and greater personal control over the content viewed (26%).

Interest in the **smart home** is growing, but device adoption remains limited. Smart TVs are the most common (69%), followed by consoles and voice assistants (23%). Over the next five years, an increase in **smart utilities** such as security, lighting, and heating is expected. However, adoption is hindered by doubts regarding value, convenience, and security. 50% fear hacker attacks on connected devices and 51% believe it is impossible to fully protect their data online; only 42% feel they have control over their data, although 32% of young people would agree to share it to obtain personalised services.

Security concerns also persist regarding **artificial intelligence**, with 56% of households worried about its influence on content reliability and 62% fearing its malicious use to create fake or dangerous materials. 53% call for more intervention from governments and authorities to reduce the risks associated with its improper use. In this context, it becomes fundamental to develop a secure, reliable, and resilient ultra-broadband infrastructure, capable of guaranteeing stable connectivity, data protection, and support for digital innovation, responding concretely to the needs and concerns highlighted by the survey.

CYBER SECURITY TRAINING & AWARENESS

In 2025, the commitment to Information & Cyber Security training & awareness continued, aimed at enhancing the corporate cybersecurity culture. This involved personnel in various initiatives focused on recognising and managing threats and risks related to the cyber world, including:

- interactive awareness courses via webinars;
- specific awareness pathways for users with administrative privileges;
- video lessons and quizzes on a dedicated platform;
- publication of "Cyber Security Bulletins";
- communication of "Cyber Hot Topics" with tips on best practices to adopt for safe working;
- "Cyber Security Alerts" regarding ongoing phishing and smishing campaigns;
- Fake Phishing (ethical phishing) campaigns to assess corporate readiness, raise awareness of attack scenarios, and provide practical instructions for identifying and preventing future threats;
- courses targeted at employees with higher failure rates in ethical phishing campaigns;
- simulations related to the management of unavailability events.

157 EY Decoding the Digital Home Study 2024.

158 Information Security Management Systems.

159 Business Continuity Management Systems.

- supervising compliance with the contractual requirements and constraints governing the services;
- meeting the needs and expectations of both internal and external stakeholders.

An annual plan for verifying information security levels is scheduled through activities aimed at measuring the technical resilience of specific targets (**Vulnerability Assessment** and **Penetration Testing**).

6.4.2 BUSINESS CONTINUITY PLAN

Open Fiber has adopted a Business Continuity Plan fully aligned with the international ISO 22301 standard, the benchmark for business continuity management. This methodological approach ensures that all recovery strategies and actions are developed based on a detailed analysis of impacts on essential activities (Business Impact Analysis) and corporate risk assessment, ensuring the protection of critical processes and a structured response to adverse events.

The Plan defines clear roles and responsibilities and is organised into intervention sheets dedicated to five critical areas of potential unavailability: internal personnel, suppliers, core infrastructure, ICT systems, and buildings. For each scenario, detailed management, escalation, and communication procedures are described, ensuring consistency in actions and the rapid mobilisation of the resources involved.

Provisions are made for verification and improvement through periodic drills, internal audits, and continuous training activities aimed at both the personnel involved in the procedures and those operating within critical processes. Additionally, the planning includes Vulnerability Assessment and Penetration Testing activities to strengthen the technical resilience of systems and ensure information security.

The periodic review of the Plan, particularly following organisational changes, the implementation of new processes, or technological developments, is an integral part of the continuous improvement cycle. This approach maintains the company's high capacity to prevent, respond, and recover, strengthening dialogue with stakeholders and guaranteeing service continuity even under critical conditions. The integration of business continuity thus contributes to protecting corporate reputation, regulatory compliance, and the trust of customers and stakeholders.

6.5 SUPPLY CHAIN ACCOUNTABILITY

6.5.1 QUALIFICATION PROCESS

The creation of a national ultra-broadband infrastructure requires a solid network of partners and businesses. To cable the country, Open Fiber establishes strategic collaborations based on rigorous quality standards, which are essential to ensuring the reliability and effectiveness of the country's cabling.

For the **construction, management, and maintenance of the network infrastructure**, Open Fiber relies on leading system integrators, respecting Italy's environmental and landscape heritage[160] and minimising not only the environmental impacts related to the construction of new infrastructure but also the social impacts associated with the presence of construction sites in the urban contexts where it operates.

Regarding the **procurement of goods and products** – both passive (e.g., cables, manholes, covers, cabinets) and active (e.g., access equipment and OTDR[161]) – Open Fiber directly purchases almost all necessary materials to ensure the maximum quality of the infrastructure. Production is located both in EU and non-EU countries, and these products are purchased not only from the Italian market but also from foreign suppliers: for example, the cables purchased are produced partly in Italy, but on a large scale in India, China, and South Korea.

Corporate operations are based on the principles of quality, transparency, and sustainability in **procurement**, ensuring efficient and responsible processes. On this basis, a transparent and open **Qualification Process** is defined, aimed at all companies and professionals interested in collaborating, which is distinguished by:

- **A&B Cluster**: it is the sector in which Open Fiber is involved in the construction of infrastructure with its own investments (cities and more urbanised areas) and which also includes all services and supplies in accordance with company operations;
- **C&D Cluster**: this is the sector in which Open Fiber is involved in the construction of the infrastructure, using funding provided by Infratel Italia S.p.A., with the aim of developing Ultra Broadband in areas of market failure. The qualification process for Cluster C&D also applies to the construction of the network infrastructure in the lots of *Italia a 1 Giga* Plan[162].

As regards the **A&B Cluster**, for each product category[163] the Basic Qualification Requirements (*Requisiti di Base per la Qualificazione*, RBQ) were defined, i.e., the basic technical-qualitative requirements that companies must meet in order to be considered qualified and included in the list of Open Fiber suppliers. Specifically for work groups, there is a minimum requirement that mandates qualification be contingent upon the participation of Management System (QHSE) managers and operational personnel in **training courses provided** by institutions recognised by Open Fiber.

When initiating procurement procedures for works, services, and supplies as a Concessionaire (**C&D Cluster**), Open Fiber follows the provisions set out in its Operating Manual, approved by the Granting Authority, Infratel Italia S.p.A. Operators interested in participating in the calls for tenders must first have joined the **Access Mechanism**, which is open to all who possess the necessary general, economic, and technical-professional requirements[164]. Accession is a transparent, objective, and non-discriminatory process, organised into successive phases, with the aim of assessing the suitability of Economic Operators for the execution of contracts.

Regarding "**Grey Areas**" (Aree Grigie), a specific qualification system is not provided; therefore, Economic Operators qualified for C&D Cluster are invited to submit bids. Where the latter lacks specific product categories related to the subject of the contract or the tender procedure, the specific category of the Suppliers' Register active for awarding contracts in A&B Cluster territories is used.

In addition to requirements for productivity and economic reliability of the operator, the Qualification Process also requires a series of qualitative criteria (mandatory or preferential depending on the relevant product category) which include:

- a traceability system for raw materials and products;
- possession of a corporate Quality Management System certified to UNI EN ISO 9001 by an accredited certification body;
- an Environmental Management System compliant with and/or certified according to the UNI EN ISO 14001 standard;
- an Occupational Health and Safety Management System compliant with and/or certified according to the UNI ISO 45001 standard;
- an Energy Management System compliant with and/or certified according to the UNI CEI EN ISO 50001 standard;

160 In agreement with the reference managing bodies.

161 Optical Time Domain Reflectometers – used both to certify new fiber installations and to diagnose faults in fiber optic networks, which contain the location of any faults and the performance of multifunction tests.

162 *"Italia a 1 Giga"* Plan is the first and most important one out of the 'Ultra-broadband Strategy' projects financed by the NRRP funds. In fact, out of the 6.7 billion euros of the NRRP allocated to ultra-broadband, 3.7 billion have been allocated to the *"Piano Italia a 1 Giga"*. 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.

163 For example: Network elements, Construction and maintenance of fiber optic telecommunications systems, Professional services for the design of fiber optic networks and FWA.

164 Within the C&D Cluster, economic operators are selected by means of an Access Mechanism that is open to all those who meet the general, economic and technical-professional requirements. For further information, please refer to the Operating Manual available on the company website at the following link: https://openfiber.it/fornitori/diventa-fornitore/.

- registration on the Open-es ESG vendor rating platform[165].

Still within the scope of the qualification process, Open Fiber utilises business intelligence services to analyse **reputational risk**, ensuring that supply chain counterparties respect the values and principles of the Code of Ethics and corporate policies. The reputational analysis covers various thematic areas, including the environment (e.g. responsible waste management) and social issues, with particular focus on respect for human rights and the protection of workers. Reputational risk management plays a crucial role because, through specific procedures, it is possible to prevent links, even indirect ones, with sanctioned entities. A relevant example is represented by the risks related to the Russia-Ukraine conflict, which necessitated in-depth verifications in order to guarantee full compliance with regulations and the protection of corporate integrity.

6.5.2 PERIODICAL ASSESSMENT OF SUPPLIERS

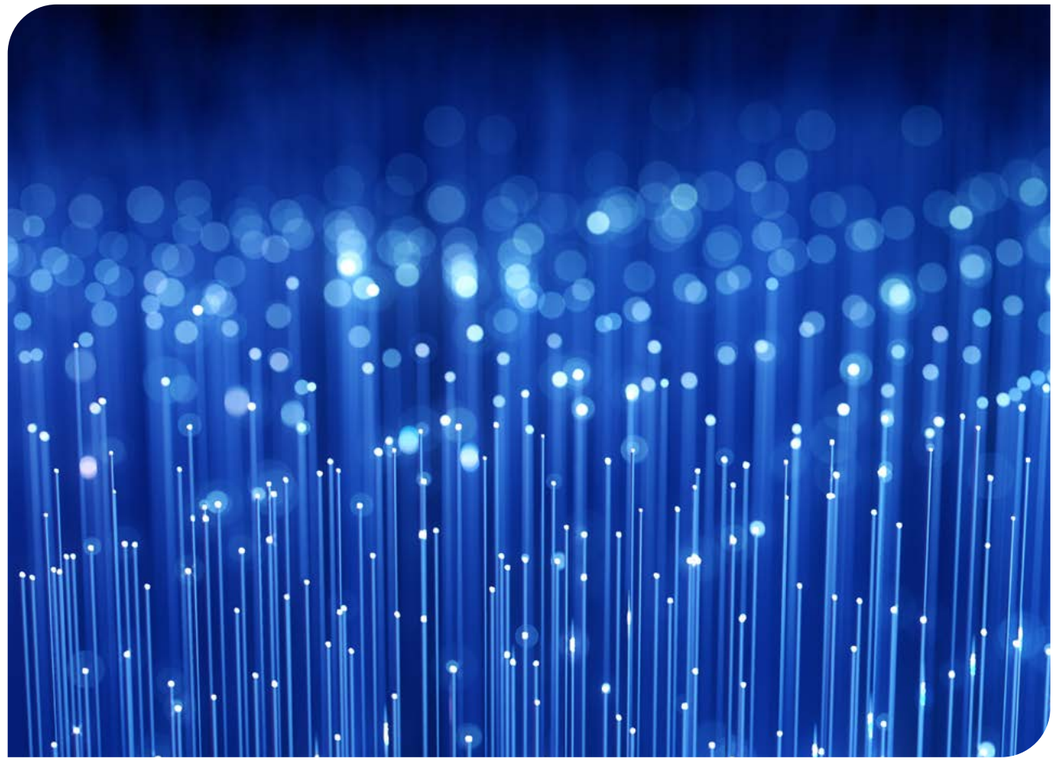
To measure performance and the maintenance of technical-qualitative requirements, Open Fiber adopts a **Vendor Rating** model that assigns each Economic Operator a **score** based on technical-economic, production, environmental, and social parameters. The **Vendor Rating Index** (VRI) applies to all qualified suppliers, or those joining the Access Mechanism, who are awarded contracts for works, services, and supplies with a direct impact on quality or that are critical for achieving corporate objectives[166].

The macro-areas assessed within the VRI (Vendor Rating Index) take into account not only compliance with performance requirements related to agreements reached during the negotiation phase (for example, everything concerning the delivery of goods, products, and services) but also aspects of occupational health and safety management (such as the frequency and severity of injuries), environmental protection (such as compliance in waste management), and adherence to quality standards – as defined by technical regulations – for the in-progress inspection of Open Fiber systems. Based on the VRI score achieved and the severity of any identified deficiencies, the Company adopts specific measures, which may include requesting improvement or corrective actions from suppliers, leading, in the most critical cases, to the suspension or exclusion of the supplier from the Suppliers' Register and/or the Access Mechanism.

PERFORMANCE ASSESSMENT TO PREVENT AND MITIGATE ENVIRONMENTAL AND SOCIAL IMPACTS ALONG THE SUPPLY CHAIN

Open Fiber identified and analysed the actual and potential negative environmental and social impacts along its supply chain. It therefore carries out periodic performance evaluations by assigning an IVR. The main ones are:

- **social impacts:** these relate to topics connected to Occupational Health and Safety, negative impacts on citizens (for example in terms of interruption of the provision of public utility services due to damage and in terms of injuries due to inopportune management of construction sites) and labour practices (for example connected to the regular payment of social security contributions by companies);
- **environmental impacts:** these are impacts connected to the use of raw materials and natural resources, the production of waste, atmospheric emissions, noise emissions, as well as accidental events with negative impacts on the environment.



6.5.3 SUSTAINABLE PROCUREMENT

In line with its corporate values, Open Fiber launched a pilot project between 2022 and 2023 to evaluate the integration of ESG principles within its supply chain. Through a self-assessment questionnaire aimed at its most relevant suppliers and a rating model based on international standards and a "risk-based thinking" approach, the Company was able to measure the level of attention and commitment to sustainability across its supply chain.

The pilot project and the results obtained provided a further boost in defining a sustainable procurement strategy and a path for the gradual introduction of tools for the assessment and monitoring of suppliers on ESG issues. The first major milestone of this journey, which took place at the end of 2023, was Open Fiber's joining of the **Open-es ESG vendor rating platform**[167] as a **Value Chain Leader Partner**. Open-es is a digital tool supporting the sustainable development of all companies, from SMEs to major players. Through this tool, it is possible to measure ESG performance, evaluate and share data and experiences, obtain personalised development plans, and identify solutions to undertake a journey of continuous and constant improvement over time. Furthermore, the Value Chain Leader Partner profile **allows for the assessment of the sustainability performance of the company's supply chain and supports its optimisation and implementation.**

165 For further details, please refer to paragraph 6.5.3 "Sustainable procurement".

166 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.

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

Joining the platform is a strategic choice and an opportunity to disseminate the company's values, Mission, and Vision throughout the entire supply chain. Through this tool, the Company promotes innovation and digital transformation within the industry and fosters a constructive dialogue on ESG issues, not only with its own suppliers but also with other participating partners, creating synergies and contributing to a sustainable and responsible development model.

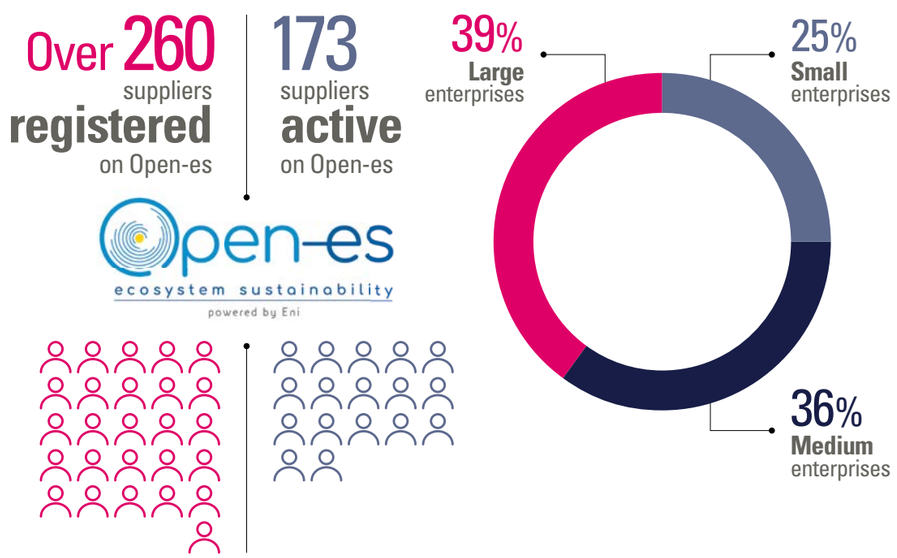
With the aim of strengthening awareness of the commitments made regarding sustainable procurement, an **ad hoc training pathway** was designed during the 2024-2025 biennium, **involving the entire Purchasing Department**. The training programme, delivered in 4-hour sessions, included a section dedicated to **general aspects** of sustainable procurement (e.g. risks and opportunities in the supply chain, national and European regulatory frameworks, sustainability criteria in procurement processes, scouting practices to identify high-performing suppliers) and a section focused on the contents of the Sustainable Procurement Policy and the **actions set out in the Sustainability Plan** to foster continuous improvement of ESG performance along the value chain.

OPEN-ES VALUE CHAIN LEADER PARTNER

Since 2024, Open Fiber has been actively participating in the development and training activities provided within the Open-es framework as a Value Chain Leader Partner, guiding the **platform's evolution** with the aim of having an increasingly high-performing and effective ESG vendor rating tool. Furthermore, Open Fiber promotes participation in Open-es among its suppliers, requiring them, as of 2025, to register on the platform and encouraging them to complete the performance assessment **questionnaire** and participate in **training activities, events, and projects** (e.g., working groups on specific topics) developed therein.

As of 31 December 2025, the results are as follows:

FIGURE 24: SIZE OF SUPPLIERS REGISTERED ON OPEN-ES

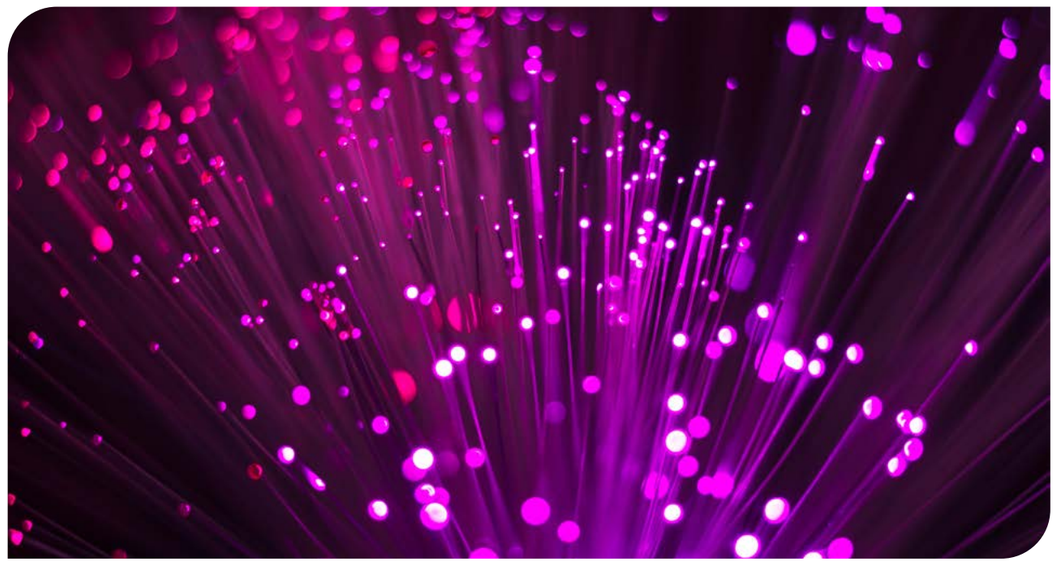


In particular, during 2025, Open Fiber promoted the new "**ECOgenius – Carbon Estimator**" tool among its suppliers. Developed by Open-es, this tool enables the measurement of **Scope 1 & 2 emissions** in line with the GHG Protocol Standard. Open Fiber believes in the potential of this tool to facilitate companies on their **decarbonisation journey** through a pragmatic and concrete approach.

SUSTAINABLE PROCURMENT POLICY

The Sustainable Procurement Policy formalises the company's commitment to adopting a procurement model that integrates sustainability criteria to maximise positive environmental, social, and economic impacts generated along the supply chain, as well as to minimise negative ones.
Approved in May 2024 and inspired by the **ISO 20400:2017 Guidelines – "Sustainable Procurement Guidance"**, the Policy identifies principles and commitments aimed at ensuring the integration of sustainability throughout all stages of the procurement process. The selected criteria cover a series of activities to be followed, including:

- considering the **entire life cycle of purchased products and services**, integrating purchasing decisions with economic, social, and environmental criteria;
- purchasing goods and services that reflect recognised **environmental and social specifications and/or standards**;
- ensuring the purchase of raw materials and components from suppliers able to demonstrate **respect for human and labour rights** throughout their production process;
- **evaluating and progressively reducing the environmental footprint** resulting from the procurement of materials, products, and services during their life cycle;
- **generating value for local communities** through procurement dynamics, favouring, where possible, the purchase of local products and services;
- **creating an internal culture** on the sustainable supply model by developing specific training and information activities dedicated to personnel;
- promoting **growing awareness among supply chain actors** regarding the importance of sustainability, sharing sustainability knowledge and best practices with suppliers and peers, and encouraging these entities to adopt responsible and innovative practices;
- **periodically evaluating the sustainability performance of suppliers** with a focus on their most significant impacts;
- constantly **monitoring**, through appropriate KPIs, **the progress of the sustainable purchasing process** to guarantee the continuous improvement of the value chain's sustainability performance.



07. GUIDANCE

Open Fiber's 2025 Sustainability Report represents a voluntary tool through which the Company transparently communicates to its internal and external stakeholders the commitment and initiatives developed regarding environmental, social, and governance issues. The document was prepared with the aim of offering a clear and comprehensive view of Open Fiber's activities, business progress, and its results, illustrating the impacts generated in relation to material topics while describing the sustainability risks and opportunities that may produce current or potential effects on the Company's financial performance.

The structure of the report is defined based on the results of the materiality analysis, which made it possible to identify the topics most relevant to Open Fiber and its stakeholders. In-depth sections within the document are dedicated to each of these topics, which are associated with specific performance indicators detailed in paragraph 7.5 "Data tables and performance indicators".

For more details on the initiatives dedicated to customers, communities and the local area, please consult the website www.openfiber.it.

7.1 METHODOLOGICAL NOTE

The Sustainability Report was drafted in accordance with the GRI Standards 2021, published by the GRI (Global Reporting Initiative) in 2021. Furthermore, with specific reference to the materiality analysis, the requirements introduced at European level by the Corporate Sustainability Reporting Directive (CSRD) and by the European Sustainability Reporting Standard (ESRS) adopted through the EU Delegated Regulation 2023/2772 were taken into consideration.

In line with the reference standards and in order to guarantee the quality and correct presentation of the information reported, the content definition process followed the principles of accuracy, balance, clarity, comparability, completeness, sustainability context, timeliness and verifiability.

In accordance with these principles, the reporting period for this document is the 2025 financial year (from 1st January to 31st December) and the performance indicators refer, where possible, to the three-year period 2023-2025. With the aim of providing a complete view of the company's performance, the most significant events that occurred in the first months of 2026 have been reported.

The information and data contained in this Report refer to Open Fiber S.p.A. and Open Fiber Network Solutions S.c.a.r.l.[168], Consortium established with the aim of driving Italy's digital and technological transformation. To ensure the comparability of information with previous years, the main KPIs are reported separately for the performance of Open Fiber S.p.A. (period 2023-2025), for the performance of Open Fiber Network Solutions and for the consolidated performances in the paragraph 7.5 "Data and performance indicators tables"[169].

All the information contained in "GRI 2 - General Information 2021" has been included in the Report; if, for legitimate reasons, certain information has been omitted, this has been indicated in the "GRI Content Index" with an explanation for the omission.

The material topics have been identified and reported in accordance with the criteria indicated in "GRI 3 - Material Topics 2021" and according to the "**double materiality**" perspective provided by the CSRD. For each of the material topics, the applicable disclosures of the "GRI Specific Standards" have been reported. Where there were more appropriate tools to represent performance on a specific topic (for example, the Financial Statements and Code of Ethics), reference was made for discussion or further information in the relevant paragraphs and in the "Comments" column of the "GRI Content Index". No sector-specific GRI standards are currently available that are applicable to Open Fiber's activities. The "GRI Content Index" has been published in this Report and the use of the GRI Standards has been notified to the GRI.

Finally, a reference has been included to the main Sustainable Development Goals (SDGs) of the United Nations 2030 Agenda, to which Open Fiber contributes with its activities.

7.2 IDENTIFICATION OF MATERIAL TOPICS

In 2025, Open Fiber updated the analysis methodology of double materiality or "double relevance", introduced by the CSRD and by the European Sustainability Reporting Standards (ESRS) to identify material topics, in anticipation of the entry into force of the relative legislative obligations. Based on this approach, the material topics are identified according to the significance of the impact and the financial significance, i.e. by assessing the significance of the impacts that the organisation has or could have on sustainability issues and the significance of the financial impacts generated by sustainability issues on the Company.

The process began with an analysis of the context in which the Company operates, with the aim of identifying the positive and negative, actual or potential impacts that Open Fiber generates (or could generate) on ESG topics along its value chain. This preliminary phase included:

- Analysis of the **main trends in the industry**, **reporting standards and sustainability ratings** at an international level;
- Analysis of the **applicable legislation**, including policy documents (e.g. Taxonomy, Corporate Sustainability Reporting Directive and Delegated Regulation EU 2023/2772, Corporate Sustainability Due Diligence Directive);
- **Benchmarking** of competitors and comparable companies through the main public documents on sustainability and social responsibility;
- **Press review** of the main articles concerning the Company in the reporting year;
- Analysis of **company documentation** such as policies, internal procedures, relevant documents on the internal regulatory system (e.g. Code of Ethics) and documents that formalise management systems compliant with international standards adopted by the organisation (e.g. ISO 9001, ISO 14001, ISO 45001, ISO 27001, ISO 22301);
- **Analysis of the company value chain** aimed at identifying the impacts, risks and opportunities of the company's activities and those upstream and downstream of the value chain, as well as the related stakeholders.

The impacts identified were grouped and summarised in a **"short list" of 30 impacts** (9 positive, 21 negative, 21 actual and 9 potential) as shown below.

The "short list" was then **assessed** by the **main categories of stakeholder**[170]. Based on a representative sample, the **significance of the impacts** was evaluated according to their severity[171] for actual impacts and the combination of severity and probability of these occurring for potential impacts (impact materiality). They were given a **survey questionnaire** and each stakeholder category was assigned a specific weight to weigh up the relative evaluations[172]. Furthermore, Open Fiber employees were also involved in a **focus group** on sustainability topics.

Afterwards, in line with the Company's Enterprise Risk Management methodology, the risks and opportunities relating to sustainability topics that could have an

168 Established in 2022 and controlled by Open Fiber S.p.A. (shareholding of 99.08% as of January 2026).

169 The only exception being the economic performances, for which only the consolidated performances are reported.

170 Shareholders, customers, suppliers and employees.

171 For the negative impacts, the severity is determined by: 1) Severity scale, i.e., how serious the impact is. 2) Scope, how widespread the impact is. 3) Irremediable character, how difficult it is to mitigate or compensate for the resulting damage. For positive impacts, the severity is determined only by the first two criteria already mentioned for negative ones, namely: severity scale and scope of application.

172 The weight assigned to stakeholders was established according to the prioritisation carried out as part of the strengthening of the stakeholder engagement strategy.

FIGURE 25: 2025 LIST OF IMPACTS

ENVIRONMENTAL

- (−) ★ Direct and indirect emission generation (Scope 1, Scope 2) in business operations
- (−) ★ Generation of emissions along the value chain (Scope 3)
- (−) ★ Energy consumption
- (+) ★ Enabling the ecological transition
- (−) ★ Water, air and soil pollution caused by the Company's activities and its value chain
- (−) ★ Production of potentially hazardous substances from the Company's activities and its value chain
- (−) ★ Water consumption and withdrawal
- (−) ★ Water discharges
- (−) ★ Biodiversity and ecosystem alteration
- (−) ★ Resource consumption
- (−) ★ Direct waste production
- (−) ★ Waste production along the value chain

GOVERNANCE

- (−) ? Delayed or non-payment of suppliers
- (−) ? Episodes of corruption and conflicts of interest
- (+) ★ Development of a company culture based on principles of ethics and integrity
- (−) ? Privacy and cybersecurity breach incidents

SOCIAL

- (+) ★ Economic security and protection of of the company's workers' rights
- (+) ★ Workers' wellbeing, training, skill development and talent attraction
- (−) ? Negative effects on company's workers' health and safety
- (−) ? Episodes of human rights violations and episodes of discrimination, harassment and abuse in the
- (−) ? Non-recognition of workers' demands, lack of inclusiveness in the workplace
- (−) ? Negative effects on workers' health and safety along the value chain
- (+) ★ Skills development of value chain workers
- (−) ? Episodes of labour rights violations along the value chain
- (−) ? Human rights violations and episodes of discrimination, harassment and abuse along the value chain
- (+) ★ Spreading ESG practices along the value chain
- (−) ★ Negative effects linked to the construction site
- (+) ★ Customers' and end-users' satisfaction
- (+) ★ Contribution to socioeconomic development
- (+) ★ Contribution to technological innovation and digitalisation

(+) positive impact (−) negative impact ★ actual impact ? potential impact

actual or potential impact on the Company's economic and financial prospects were identified and assessed. The significance of the risks and opportunities was assessed in terms of their financial materiality.

By combining impact materiality and financial materiality, and setting a threshold of relevance, 9 material topics were identified:

- **Consumers and end users**: ensuring continuity, reliability, and quality of service for customers and end users, responding to market needs through the development of innovative offers, while simultaneously ensuring access to adequate information regarding the economic, environmental, and social impacts of the activities carried out.
- **Affected communities**: contributing to the socio-economic development of the country and local communities, and minimising the impacts associated with the construction and management of the network, also through a careful management of relations with local administrations and competent authorities.
- **Business conduct**: ensuring ethical business management, facing various types of illegal activities such as unfair commercial practices, abuse of market position, anti-competitive behaviour, price fixing and corrupt practices.
- **Innovation and digitalisation**: contributing to technological innovation and digital transformation through the services offered and promoting a conscious use of the internet and technologies.
- **Privacy and cybersecurity**: ensuring adequate levels of privacy for customers and end users and preventing cyberattacks that could jeopardise service continuity and network reliability.
- **Own workforce**: ensuring adequate protection of the human resources employed within the organisation, with particular reference to health and safety, diversity, equity, and inclusion, by investing in the development and enhancement of talents.
- **Climate change**: contributing to the fight against climate change through actions to reduce emissions directly and indirectly linked to the business, including improving energy efficiency and using energy from renewable sources. Identifying and adopting appropriate measures to prevent or minimise damage resulting from climate change or to take advantage of opportunities that may arise.
- **Circular economy**: contributing to the transition to a circular economy by sourcing materials and products with a reduced environmental impact throughout their life cycle, minimising waste production and maximising reuse, recycling and recovery practices.
- **Responsible value chain management**: selecting and evaluating suppliers and business partners based on specific social and environmental criteria such as occupational health and safety, fair contractual conditions and minimisation of environmental impacts.

MATERIALITY ANALYSIS FOCUS GROUP

The goal of the focus group organised at the Rome headquarters, which involved a panel of the Company's employees, is to understand, through direct interaction, the workers' **perspective** on the actual and potential impacts on people and the environment related to Open Fiber's operations. The event, which in 2025 reached its second edition, allowed for the collection of contributions and feedback useful for understanding the interests and expectations of staff towards the organisation, strengths and areas for improvement regarding ESG aspects, and identifying the **most relevant sustainability topics** to address within the scope of reporting and corporate strategy. To achieve this, several questions were put to colleagues via an online tool, which helped to foster a constructive debate on sustainability topics.

The focus group also represented a moment to raise awareness of the **materiality analysis tool** and its importance, also showing best practices, and to conduct the impact assessment survey live.

The update of the materiality analysis led, compared to 2024, to the exclusion of the topic 'Biodiversity and ecosystems' and the introduction of the new material topic 'Innovation and digitalisation'.

Here follows a table showing the correlation between the material topics, the impacts and the aspects of the GRI Standard of reference, with indications on the scope (internal and external to the organisation) and any limitations.

MATERIAL TOPIC	IMPACTS	GRI STANDARDS	SCOPE AND ANY LIMITATIONS
Consumers and end users	Satisfaction of clients and end users	**416: Customer Health and Safety 2016** 416-1 Assessment of the health and safety impacts of product and service categories 416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	Open Fiber S.p.A. and Open Fiber Network Solutions S.c.a.r.l. Suppliers involved in network construction, management, and maintenance activities (Creation, Delivery, and Assurance)
Affected communities	Contribution to socio-economic development Negative effects related to construction site activities	**201: Economic Performance 2016** 201-1 Direct economic value generated and distributed 201-2 Financial implications and other risks and opportunities due to climate change 201-3 Obligations regarding benefit plans and other retirement plans already established 201-4 Financial assistance received from government **203: Indirect Economic Impacts 2016** 203-1 Infrastructure investments and services supported 203-2 Significant indirect economic impacts **413: Local Communities 2016** 413-1 Operations with local community engagement, impact assessments, and development programmes	Open Fiber S.p.A. and Open Fiber Network Solutions S.c.a.r.l.
Business conduct	Development of a corporate culture based on principles of ethics and integrity Missed or delayed payments of suppliers Cases of corruption and conflicts of interest	**205: Anti-corruption 2016** 205-1 Operations assessed for risks related to corruption 205-2 Communication and training about anti-corruption policies and procedures 205-3 Confirmed incidents of corruption and actions taken **206: Anti-competitive Behaviour 2016** 206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	Open Fiber S.p.A. and Open Fiber Network Solutions S.c.a.r.l.
Innovation and digitalisation	Contribution to technological innovation and digitalisation	-	Open Fiber S.p.A. and Open Fiber Network Solutions S.c.a.r.l.
Privacy and cybersecurity	Episodes of privacy and cybersecurity breaches	**418: Customer Privacy 2016** 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Open Fiber S.p.A. and Open Fiber Network Solutions S.c.a.r.l.

MATERIAL TOPIC	IMPACTS	GRI STANDARDS	SCOPE AND ANY LIMITATIONS
Own workforce	Economic security and protection of Company workers' rights Well-being of Company workers, training, skills development and talent attraction Negative effects on the health and safety of Company workers Episodes of human rights violations and episodes of discrimination, harassment and abuse in the Company Failure to address the requests of Company workers, lack of inclusivity in the workplace	**401: Employment 2016** 401-1 New employee hires and employee turnover 401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees 401-3 Parental leave **403: Occupational Health and Safety 2018** 403-1 Occupational health and safety management system 403-2 Hazard identification, risk assessment, and incident investigation 403-3 Occupational health services 403-4 Worker participation, consultation, and communication on occupational health and safety 403-5 Worker training on occupational health and safety 403-6 Promotion of worker health 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships 403-9 Work-related injuries 403-10 Work-related ill health **404: Training and Education 2016** 404-1 Average hours of training per year per employee 404-3 Percentage of employees receiving regular performance and career development reviews **405: Diversity and Equal Opportunity 2016** 405-1 Diversity of governance bodies and employees	Open Fiber S.p.A. and Open Fiber Network Solutions S.c.a.r.l.

MATERIAL TOPIC	IMPACTS	GRI STANDARDS	SCOPE AND ANY LIMITATIONS
Climate change	Generation of direct and indirect emissions (Scope 1, Scope 2) in company operations Generation of emissions along the value chain (Scope 3) Energy consumption Enabling the ecological transition	**302: Energy 2016** 302-1 Energy consumption within the organisation 302-3 Energy intensity **305: Emissions 2016** 305-1 Direct greenhouse gas (GHG) emissions (Scope 1) 305-2 Indirect greenhouse gas (GHG) emissions from energy consumption (Scope 2) 305-3 Other indirect greenhouse gas (GHG) emissions (Scope 3) 305-4 Greenhouse gas (GHG) emissions intensity 305-5 Reduction of greenhouse gas (GHG) emissions	Open Fiber S.p.A. and Open Fiber Network Solutions S.c.a.r.l.
Circular economy	Materials consumption Direct waste production Waste production along the value chain	**306: Waste 2020** 306-1 Waste generation and significant waste-related impacts 306-2 Management of significant waste-related impacts 306-3 Waste generated 306-4 Waste diverted from disposal 306-5 Waste directed to disposal	Open Fiber S.p.A. and Open Fiber Network Solutions S.c.a.r.l.
Responsible value chain management	Negative effects on the health and safety of workers along the value chain Skills development of workers along the value chain Incidents of violation of workers' rights along the value chain Human rights violations and episodes of discrimination, harassment and abuse along the value chain Dissemination of ESG practices along the value chain	**308: Supplier Environmental Assessment 2016** 308-1 New suppliers that were screened using environmental criteria 308-2 Negative environmental impacts in the supply chain and actions taken **414: Supplier Social Assessment 2016** 414-1 New suppliers that were screened using social criteria 414-2 Negative social impacts in the supply chain and actions taken	Open Fiber S.p.A. and Open Fiber Network Solutions S.c.a.r.l. Suppliers involved in network construction, management, and maintenance activities (Creation, Delivery, and Assurance)

MATERIAL TOPICS AND 2030 AGENDA SDGS

OPEN FIBER MATERIAL TOPIC AND SDGS	SPECIFIC TARGET
Consumers and end users	**9.1** Developing high-quality, reliable, sustainable and resilient infrastructure, including regional and cross-border infrastructure, to support economic development and human well-being, with a focus on providing fair access for all
Affected communities	**8.2** Reaching higher levels of economic productivity through diversification, technological updating and innovation, also through a focus on sectors with high added value and labour-intensive sectors **8.3** Promoting development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formalisation and growth of micro-, small- and medium-sized enterprises, including through access to financial services **9.1** Developing high-quality, reliable, sustainable and resilient infrastructure, including regional and cross-border infrastructure, to support economic development and human well-being, with a focus on providing fair access for all **9.3** Increasing the access of small-scale industrial and other enterprises, in particular in developing countries, to financial services, including affordable credit, and their integration into value chains and markets **9.4** By 2030, upgrading infrastructure and modernising industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities **11.4** Strengthening commitments to protect and safeguard the world's cultural and natural heritage **17.6** Enhancing North-South, South-South and triangular regional and international cooperation on and access to science, technology and innovation and enhance knowledge sharing on mutually agreed terms, including through improved coordination among existing mechanisms, in particular at the United Nations level, and through a global technology facilitation mechanism
Business conduct	**9.1** Developing high-quality, reliable, sustainable and resilient infrastructure, including regional and cross-border infrastructure, to support economic development and human well-being, with a focus on providing fair access for all **16.5** Substantially reduce corruption and bribery in all their forms
Innovation and digitalisation	**9.1** Developing high-quality, reliable, sustainable and resilient infrastructure, including regional and cross-border infrastructure, to support economic development and human well-being, with a focus on providing fair access for all **9.4** By 2030, upgrading infrastructure and modernising industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities
Privacy and cybersecurity	**9.1** Developing high-quality, reliable, sustainable and resilient infrastructure, including regional and cross-border infrastructure, to support economic development and human well-being, with a focus on providing fair access for all

MATERIAL TOPICS AND 2030 AGENDA SDGS

OPEN FIBER MATERIAL TOPIC AND SDGS	SPECIFIC TARGET
Own workforce	**3.d** Strengthen the capacity of all countries, in particular developing countries, for early warning, risk reduction and management of national and global health risks **4.3** By 2030, ensure equal access for all women and men to affordable and quality technical, vocational and tertiary education, including university **4.4** By 2030, substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship **8.5** By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value **8.8** Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment **10.2** By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status **10.3** Ensure equal opportunity and reduce inequalities of outcome, including by eliminating discriminatory laws, policies and practices and promoting appropriate legislation, policies and action in this regard
Climate change	**7.2** By 2030, significantly increasing the share of renewable energy in the global energy mix **7.3** By 2030, doubling up the global rate of improvement in energy efficiency **13.2** Integrating measures to fight climate change into national policies, strategies and planning
Circular economy	**12.2** By 2030, achieving the sustainable management and efficient use of natural resources **12.5** By 2030, substantially reducing waste production through prevention, reduction, recycling and reuse
Responsible value chain management	**8.7** Adopting immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including the recruitment and use of child soldiers, and by 2025 end child labour in all its forms **8.8** Protecting labour rights and promoting safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment

7.3 STAKEHOLDER' EXPECTATIONS AND ENGAGEMENT CHANNELS

Here follows a table correlating the different categories of stakeholders with their expectations and methods of involvement, activities and responses of Open Fiber. For the mapping of Open Fiber's stakeholders, please refer to the paragraph "Strengthening the stakeholder engagement strategy".

STAKEHOLDER	EXPECTATIONS	COMPANY ENGAGEMENT, ACTIVITIES AND RESPONSES
Society and Local Community	Honesty, ethics, fairness, integrity. And also safety, health and human rights protection, respect for the environment. Open Fiber and its network, a strategic combination for the improvement of social conditions in different areas, are integrated into the territory in a widespread manner, avoiding environmental impacts, respecting the territory and its landscape, managing inconveniences, and avoiding accidents. The fiber creates employment, involves young people, reduces the digital divide and feeds the infrastructures for the development of the digital network for the country.	- Promotion and communication on the Open Fiber institutional website - Promotion and communication on social networks - Press releases - Specific engagement projects
Media, Press and Opinion Makers	Social commitment and solidarity, transparency and responsible marketing, protection of human rights and the environment, promotion of local areas, are just some of the expectations of the media, the press and the opinion makers vis-à-vis the Company. Through specific campaigns, Open Fiber raises public awareness by talking about its social commitment and attention to environmental protection. With a transparent approach, it reconstructs the progress of its activities and presents its assets for the future of the country: foresight, community support, 5G, innovation.	- Promotion and communication on the Open Fiber institutional website and social networks - Specific projects - Press releases and conferences - Interviews and publications - One-to-one meetings
Associations	Occupational safety, protection of the environment and human rights, social solidarity, diversity, equity & inclusion, improvement of public services: those are the topics at the centre of the cooperation between Open Fiber and the associations. Particular attention is also paid to reducing the digital divide, emissions in the TLC sector, the digitalisation of the economy, companies, the PA and society, and to European funds and projects in the digital field.	- Events and meetings - Memberships and agreements
Customers	Listening and service quality are two characteristics of the company that focus on the interests of its customers. Other characteristics include the speed in responding to requests, privacy protection, personal data protection and security, digitisation, development of local entrepreneurial activities, supply chain optimisation, occupational safety, and the protection of the environment and human rights.	- One-to-one meetings - Corporate events - Contracts and agreements
University and Research Centres	Development of partnerships, participation in career days, education for the future: these and many other topics animate the relationship between the Company and the universities and research centres. Open Fiber represents a potential partner for collaborations, a job opportunity for its students, an example of technological innovation and open innovation, a supporter of sporting, social and cultural initiatives and an opportunity for PCTO (former work experience programme).	- Career Days - Open Days - Collaborations and specific projects
Certification body	In order to embark on a virtuous path in the performance of its activities, Open Fiber is required to comply with international reference standards and to maintain the reputation and professionalism of the Certification body itself.	- Audits
Audit bodies and institutions	Compliance with safety regulations and the protection of the landscape and archaeological heritage during the network installation work results in a reduction in the rate of accidents and injuries on Open Fiber construction sites. The construction of digital infrastructures for the country, an opportunity for the development of employment, complies with current regulations, including those regarding the regularity of contracts and subcontracts.	- Working groups - Mandatory and on-demand information - Events and conferences - Agreements
Finance community and investors	Open Fiber is measured based on its economic and financial solidity, ESG investments, security and value of investments, operational efficiency, sound governance and transparent conduct, innovation, continuous improvement and preventive and structured management of business processes.	- Press releases - Presentation of financial and non-financial results (balance sheet) - Funding projects - One-to-one meetings
Insurance companies	They rate Open Fiber based on its economic and financial solidity, its adoption of insurance products customised for health and safety and environmental risks, its prevention practices aimed at reducing accidents, its methods for crisis/emergency management and related communication, and its adequate compensation of injured third parties.	- Contracts - One-to-one meetings
Suppliers of goods/services/work	After examining Open Fiber in order to carry out a preliminary risk assessment of the Company's contracted activities, and to verify compliance with health, safety and environmental protection regulations in all Open Fiber workplaces, the choices made regarding privacy protection and personal data security ensure a virtuous collaborative relationship and a significant return in terms of image.	- Contracts - One-to-one meetings - Events and workshops

STAKEHOLDER	EXPECTATIONS	COMPANY ENGAGEMENT, ACTIVITIES AND RESPONSES
Consultants and external collaborators	They choose Open Fiber based on its compliance with Health and Safety regulations in all workplaces and for the choices it has made regarding the protection of privacy and the security of personal data.	- One-to-one meetings - Events and workshops
Public Concessionary Authority	Development of digital infrastructure for the country, able to guarantee network reliability and service quality, in compliance with Health and Safety regulations for workers and environmental protection at work sites: this is what the Grantor requires of Open Fiber.	- Direct contacts - Mandatory and on-demand information
Existing infrastructures operators	Open Fiber is responsible for the compliant use of existing infrastructures under IRU contracts, the prevention of damage to underground networks and the management of disruptions or situations that jeopardise safety.	- Direct contacts and IRU - Communications related to the performance of work
Business partners	Development of collaborations, technological innovation and open innovation.	- Direct contacts - One-to-one meetings - Partnership agreements
Trade union representatives / Workers Safety Representatives (RLS - *Rappresentante dei Lavoratori sulla Sicurezza*)	Development of skills appropriate to the job, Health and Safety at Work, application of the industry collective agreement, increased employment, promotion of diversity, equity & inclusion in the workplace, protection of human rights, sound governance and transparent conduct.	- Regular meetings with representatives - Press releases
Workers	A healthy and safe working environment, availability of protective devices and safe and functional work equipment, *work-life balance*, parenting support, focus on continuous improvement of corporate welfare and professional well-being, protection of human rights, *diversity, equity & inclusion*, integrity and business ethics, active involvement in Health and Safety and Environmental Protection issues, skills development and training, privacy protection, personal data protection and security, absence of accidents and occupational illnesses.	- Internal organisational communications - Company intranet - Training and refresher courses - Engagement and team building initiatives - Company meetings - Corporate events
Suppliers' workers	Safe and functional work equipment, absence of occupational accidents and diseases, development of local entrepreneurial activities, privacy protection, personal data protection and security.	- Communication to suppliers
Shareholders	In Open Fiber they look for security and value for money, containment of management costs, network implementation and operational efficiency, attention to environmental and social sustainability, prevention of emergency and crisis situations, *brand reputation*, competent, trained and satisfied staff, *compliance with* the legislative context, respect for the behavioural principles contained in the Code of Ethics, implementation of the control protocols contained in the Model pursuant to Legislative Decree Legislative Decree 231/2001 for the prevention of the crimes contemplated by the decree, privacy protection, personal data protection and security, network reliability and service quality, sound governance and transparent conduct and responsible marketing.	- Meetings - Presentation of financial and non-financial results
Management	From Open Fiber it expects a satisfying relationship with the Customer, the definition of S.M.A.R.T., availability of resources to achieve objectives, carrying out work activities safely and with total respect for the environment, implementation and maintenance of the Integrated Quality, Safety and Environment Management System, responsible management of the supply chain, privacy protection, personal data protection and security, network reliability and service quality, operational efficiency and motivated people.	- Internal organisational communications - Company meetings - Corporate events
Supervisory Body pursuant to Legislative Decree 231/2001	Compliance with the behavioural principles contained in the Code of Ethics, effective implementation of the control protocols contained in the Model pursuant to Legislative Decree 231/2001 for the prevention of offences, safety, health protection and quality of production processes while fully respecting the environment.	- Dedicated information channels
Ecosystem	Taking a totally green approach, Open Fiber is committed to developing its network in a way that avoids negative environmental impacts, respects the landscape heritage, reduces CO_2 emissions and uses energy from renewable sources.	- Assessment of the social and environmental impacts connected to the activities - Establishment of environmental protection requirements - Agreements with local councils - Dialogue with the relevant authorities and superintendents
Policy Makers	Italian and European legislators aim to reduce the digital divide, offering everyone equal opportunities to access a fast, stable and safe connection. In this sense, Open Fiber is a valuable ally for the construction of digital infrastructures for the country. Furthermore, the European Union, in line with the Digital Compass and Next Generation EU, is aiming for digital transformation by 2030. In this scenario, Open Fiber is a key player in the transition to the new technology with which to wire Italy.	- Dialogue with Italian and European institutions and politicians - Active participation in industry associations

7.4 ASSOCIATIONS AND MEMBERSHIPS

Open Fiber has been a member of several national, international, and local associations, in order to contribute to the spread of a more conscious digital culture:

- **FTTH Council Europe:** Open Fiber currently holds a seat in the Board of Directors of the association - whose objective is to promote the acceleration of the adoption of a fully fiber optic connectivity in every area of Europe - and actively participates in all its working groups: Policy and Regulation Expert Group, Market Intelligence Committee, Investors Committee, Deployment & Operations Committee, Sustainability Committee. The sustainability has become one of the main topics promoted by the FTTH Council, which is conducting studies - also on the initiative of Open Fiber - to calculate the environmental impact of fiber optic networks, their benefits, especially in a scenario of switch-off of copper networks; as well as promoting the inclusion of the sector in the taxonomy regulation to facilitate access to the so-called sustainable finance.
- **Confindustria Europa:** Open Fiber participates in the activities organised by Confindustria's European office relating to sectors of corporate interest, including meetings with representatives of the European Institutions.
- **European Internet Forum:** an independent, non-profit, non-partisan association led and governed by political members, all elected members of the European Parliament (MEPs). Membership is open to all current members of the European Parliament, multi-stakeholders and players at the forefront of European and global digital transformation with the aim of promoting the development of European and multilateral public policies capable of responding to the political, economic and social challenges posed by global digital transformation, and to help Members of the European Parliament (MEPs) to ensure that European public policies are fit for the digital age.
- ***Gruppo Iniziativa Italiana* (GII):** an association that represents the Italian community in Brussels since 1995 in the fields of business, agrifood, innovation, research, and services, enhancing the country's image and promoting high-profile meetings.
- ***Assotelecomunicazioni* (ASSTEL):** a Confindustria trade association that fosters and promotes the sustainable development of the telecommunications supply chain. It protects the interests of member companies before institutional, political, and economic bodies, both public and private, and provides representation in trade union and labour matters for member companies applying the TLC National Collective Labour Agreement (CCNL) and/or the Outbound Agreement, supporting them in the management of issues of interest.
- **Assonime:** association of Italian joint-stock companies that provides studies, consultancy, one-to-one meetings, and support on issues directly or indirectly affecting the interests and development of the Italian economy.
- ***Assolombarda*:** the most important Confindustria association for companies operating in Milan and the provinces of Lodi, Monza and Brianza, and Pavia. It represents over 7,000 national and international companies of all sizes, producing goods and services across all product sectors, and protects their interests primarily in institutional and local relations in various fields such as training, environment, culture, economy, labour, and civil society.
- **Unione degli Industriali e delle Imprese – Unindustria:** the Confindustria regional association of Lazio, representing entrepreneurs and managers by offering strategic and operational support to member companies, accompanying them in resolving issues that hinder corporate life.
- ***Associazione Italiana Professionisti Security Aziendale* (AIPSA):** an association with the institutional purpose of enhancing the professional standing of the Security Manager, training and updating its members, disseminating a culture of Security, and conducting in-depth studies on technical, functional, legal, and legislative issues.
- ***Associazione Italiana Ambiente e Sicurezza* (AIAS):** an association established with the objective of disseminating and embedding a culture of safety across all workplaces and living environments. Since then, AIAS has focused on integrated Safety, along with Health, Sustainability, and the Environment.
- **Cassa Sanint:** a non-profit association operating in the healthcare assistance sector. Its members are companies (partnerships and/or corporations), entities, associations, and institutions that choose Cassa Sanint to support the health and well-being of their employees, collaborators, consultants, and associates.
- ***Associazione Italiana Internal Auditors* (AIIA):** a non-profit association and the Italian affiliate of the Institute of Internal Auditors, a professional network present worldwide today. The association is the benchmark in Italy for Internal Control, Corporate Governance, Compliance, and Risk Management issues, counting numerous professional members representing groups and companies operating in the Financial, Insurance, Manufacturing, Services, and Public sectors.
- **Association of members of Supervisory Bodies pursuant to Legislative Decree Lgs. 231/2001 (AODV 231):** a non-profit association bringing together professionals and corporate representatives who interact with the Supervisory Bodies (OdV) required by the Organizational Models adopted under Legislative Decree 231/2001. Its objectives include: studying the field application of the Decree and its implications; adopting and implementing an Organizational Model; and understanding how a Supervisory Body can concretely act to effectively fulfill its duties without hindering business operations.
- **Disaster Recovery Institute International (DRI):** the oldest and largest non-profit organisation helping organizations worldwide prepare for and recover from disasters, offering training, accreditation, and thought leadership in business continuity, disaster recovery, cyber resilience, and related fields.
- **4.Manager:** an association established by Confindustria and Federmanager with the aim of designing and implementing high-added-value initiatives to meet emerging needs for the overall growth of industrial managers and entrepreneurs.
- **I-COM-Institute for Competitiveness:** the institute is a *think tank* founded in 2005 by a group of scholars, professionals and managers based in Rome and Brussels. I-Com's objective is to promote innovative analysis and discussion on competitiveness within the Italian, European and international political and economic framework. The main sectors of interest are: digital, energy, innovation, health and institutions. In July 2017, the Institute for Competitiveness joined the Global Trade and Innovation Policy Alliance, an international network of think tanks active in the field of innovation.
- **ANFoV:** an association committed to working with the main big players in the market to offer a contribution to innovate and modernise our country. From promoting the development of fiber optic networks for the BUL to searching for the best solutions for a 5G connection that can be useful to citizens, the business system and the Public Administration.
- **ANSA Bruxelles:** since 1945, ANSA has been publishing and distributing news and in-depth analysis on the international stage, in all forms and on all transmission platforms, based on values such as independence, timeliness, completeness, and reliability. In particular, Open Fiber promotes a newsletter with ANSA Brussels focused on topics relevant to the twin transition, digital and ecological.
- **ANRA - National Association of Risk Managers and Company Insurance Managers:** the main benchmark for the creation and development of an enterprise risk management culture in Italy. Its members include Chief Risk Officers, Risk Managers,

corporate insurance managers, and Risk Management consultants. These are joined by "users," a category comprising insurance brokers, insurers, loss adjusters, and Claims Managers – professionals who, while operating in the insurance market, seek to strengthen ties with the enterprise world to better understand sector needs and perspectives.

- **AIGI – *Associazione Italiana Giuristi d'Impresa* (Italian Association of Corporate Lawyers):** this was founded in 1976 by a group of heads of legal departments of large companies, with the aim of enhancing the figure and role of the corporate lawyer by promoting their legal status, as was already happening in other countries. The association aims to promote, train and develop corporate lawyers and their role in Italy.
- **CED - *Centro Economia Digitale*:** is an independent and non-partisan think tank founded in 2017 as a non-profit association. The association's challenge is to build skills, effective organisations and institutions suitable for the digital and sustainable economy. The centre's partners are among the most important Italian strategic companies operating in sectors with a very high level of innovation.
- **Valore D:** the first association of companies in Italy that, since 2009, has promoted gender balance and an inclusive culture within organizations and across the country. It is a continuously growing network where dialogue and sharing play a key role.
- ***Cresciamo il futuro* Foundation:** the initiative is inspired by the successful pilot project already launched by the Foundation's member companies – A2A, Engineering, Eni, FiberCop, Fincantieri, Intesa Sanpaolo, ITA Airways, Leonardo, and Open Fiber – which created a network of corporate nurseries, demonstrating the model's validity and sustainability. The Foundation is committed to defining access criteria, the network's governance model, and a dedicated technological platform for management. Furthermore, it pledges to observe rigorous pedagogical and safety standards and to launch initiatives aimed at expanding the network.
- **Politecnico di Milano Observatories:** the Digital Innovation Observatories of the School of Management at Politecnico di Milano are the benchmark in Italy for digital innovation. Research activities are conducted by a team of nearly 200 Professors, Researchers, and Analysts working across approximately 60 different Observatories on Digital Innovation in businesses and Public Administration. Open Fiber participated in the following observatories:
  - **Smart City:** the Observatory investigates opportunities related to smart cities, combining technological, environmental, economic, and social perspectives with the effective enhancement of projects and applications for Public Administrations and citizens. For this reason, the Observatory organizes discussion groups and networking opportunities between companies and the PAs (Municipalities, Regions, Institutions) involved in the various workshops.
  - **5G & Connected Digital Industry:** the Observatory aims to be the benchmark for the TLC ecosystem and various industries to outline different connectivity scenarios and potential future evolutions.
  - **Data Center:** the Observatory was established as research related to the Cloud Transformation Observatory's activities, with the goal of creating and disseminating knowledge about the Italian and European Data Center supply chain and the infrastructures present in their respective territories, as a strategic asset for digitalization and a key element for the continent's international competitiveness.
- **Italian Datacenter Association (IDA):** an Italian association of Data Center builders and operators, established through the partnership between Microsoft, Equinix, Rai Way, Data4, STACK Infrastructure, Digital Realty, Vantage Data Centers, and CBRE Data Centers, which aims to bring together all ecosystem players in Italy. The sector's most relevant companies work together to build a common space to represent and ensure the promotion of Data Centers as a pillar of the digital economy.
- **Restart Foundation:** since 2023, Open Fiber has been part of the RESTART Foundation, which serves as an organizational and coordinating hub for a structure organized into "Hubs and Spokes." it involves universities, research centers, companies, and public administrations in dozens of scientific and technical projects on fixed networks, cellular networks (including 5G/6G), the Internet, and innovative applications and services.

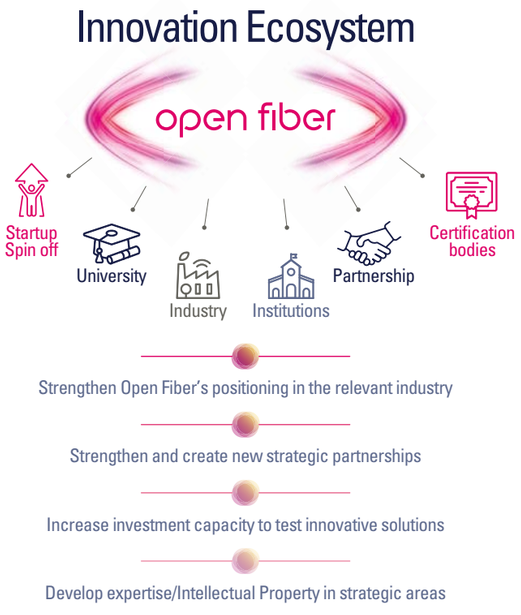
At the local level, starting from 2025, Open Fiber has worked towards the company's membership in various Confindustria Associations. Participation in these associations aims to create strategic relationships for OF and accelerate business opportunities. Specifically, Open Fiber currently adheres to:

- **Confindustria Abruzzo Medio Adriatico:** the association of industrialists for the provinces of Chieti, Pescara, and Teramo.
- **Sicindustria:** the territorial association of the Sicilian Confindustria system, with operational and representative offices in the provinces of Agrigento, Caltanissetta, Enna, Messina, Palermo, Ragusa, and Trapani.
- **Unindustria Calabria**: the union of industrialists and enterprises for the provinces of Catanzaro, Cosenza, Crotone, Reggio Calabria, and Vibo Valentia.
- **Confindustria Marche**: the association of territorial enterprises for the provinces of Ancona, Fermo, Ascoli Piceno, Macerata, and Pesaro Urbino.

Furthermore, Open Fiber is a member of the *Comitato Elettrotecnico Italiano* (CEI), the Italian Association for Trenchless Technology (IATT) and the *Ente Italiano di Normazione* (UNI) and participates in the technical committees and work groups of these associations:

- ***Comitato Elettrotecnico Italiano* (CEI):** it is a private association responsible for technical standardisation in the electrotechnical, electronic and telecommunications fields at a national level. Its mission, as a national *super partes* organisation, is to publish technical standardisation documents in Italy, participate in the development of corresponding European and international standards and ensure their implementation, as well as disseminate technical-scientific culture in general and that of technical standardisation in particular.
- **Italian Association for Trenchless Technology (IATT):** this association promotes the advancement of scientific and technical knowledge in the field of trenchless (no-dig) technologies; its members include the major Italian utility network management companies, universities and research institutes, specialised companies, consultants and professionals in the sector. The mission is to research and apply technically advanced solutions to limit road tampering, excavation and earth movement, as well as harmful gas emissions and accidents on construction sites, reduce work execution times and energy consumption, moderating the negative environmental and social impact that excavation work inevitably entails.
- ***Ente Italiano di Normazione* (UNI):** an association that develops, publishes and disseminates standards whose voluntary adoption guarantees the best solution for creating a product, conducting a process or carrying out a profession. The high efficiency and effectiveness of these standards is due to the values that distinguish them, such as consistency of content, transparency in the development process, openness for participation in the development of the standard, consensus for approval, voluntary membership, independence of the association and the efficiency of the standards issued.
- **International Electrotechnical Commission (IEC):** the IEC is a global non-profit organisation whose work underpins quality infrastructure and international trade in electrical and electronic products. The Commission's work facilitates technical innovation, the development of affordable infrastructure,

efficient and sustainable access to energy, urbanisation and intelligent transport systems, the mitigation of climate change and increases the safety of people and the environment. The IEC brings together more than 170 countries and provides a global, neutral and independent standardisation platform for 20,000 experts worldwide. It manages 4 Conformity Assessment Systems whose members certify that devices, systems, installations, services and people function as required.



As for its relations with **institutional stakeholder**, such as the European Commission, the European Parliament and the Council of the European Union, Open Fiber is registered in the Transparency Register and maintains relations with the Permanent Representation of Italy to the European Union.



7.5 DATA AND PERFORMANCE INDICATORS TABLES

Tables with GRI metrics and key performance indicators related to Open Fiber's material topics are reported below. With reference to Privacy and cybersecurity, Biodiversity and ecosystems and Customers and end-users' topics, please refer to the GRI content index.

7.5.1 GENERAL DISCLOSURE

7.5.1.1 GRI 2-7 e 2-8: Employees and other workers

GRI 2-7 E 2-8: INFORMATION ON EMPLOYEES AND OTHER WORKERS – OPEN FIBER S.P.A.

EMPLOYEES BY EMPLOYMENT CONTRACT AS OF 31ST DECEMBER

Employment contract	Gender	U.M.	2023	2024	2025
Permanent	Female	no.	579	607	616
	Male	no.	1,155	1,195	1,220
	Total	no.	**1,734**	**1,802**	**1,836**
Fixed term	Female	no.	0	1	0
	Male	no.	0	0	0
	Total	no.	**0**	**1**	**0**

EMPLOYEES BY EMPLOYMENT CONTRACT AS OF 31ST DECEMBER

Contract type	Gender	U.M.	2023	2024	2025
Full-time	Female	no.	574	603	612
	Male	no.	1,154	1,194	1,219
	Total	no.	**1,728**	**1,797**	**1,831**
Part-time	Female	no.	5	5	4
	Male	no.	1	1	1
	Total	no.	**6**	**6**	**5**

EMPLOYEES BY EMPLOYMENT CONTRACT AS OF 31ST DECEMBER

Description	U.M.	2023	2024	2025
Total employees as of 31st December	no.	**1,734**	**1,803**	**1,836**

OTHER WORKERS AS OF 31ST DECEMBER

Description	U.M.	2023	2024	2025
Employees of other organisation	no.	1	2	0
Interns	no.	18	13	5
Outsourced workers	no.	14	21	63
Collaborators	no.	6	0	0

Notes: in the two-year period 2024-2025, two employees, one man and one woman, are employed at the Brussels office in Belgium, both on full-time, permanent contracts, while the remaining employees are employed at various locations in Italy.
In 2024, the workers seconded from another company are one woman and one man, the interns are six women and seven men, and the temporary workers are 11 women and 10 men. In 2025, the interns are four women and one man, and the temporary workers are 31 women and 32 men.

GRI 2-7 E 2-8: INFORMATION ON EMPLOYEES AND OTHER WORKERS – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

EMPLOYEES BY EMPLOYMENT CONTRACT AS OF 31ST DECEMBER

Employment contract	Gender	U.M.	2023	2024	2025
Permanent	Female	no.	15	22	25
	Male	no.	258	299	347
	Total	no.	**273**	**321**	**372**
Fixed term	Female	no.	2	0	2
	Male	no.	86	21	38
	Total	no.	**88**	**21**	**40**

EMPLOYEES BY EMPLOYMENT CONTRACT AS OF 31ST DECEMBER

Contract type	Gender	U.M.	2023	2024	2025
Full-time	Female	no.	17	21	26
	Male	no.	344	320	372
	Total	no.	**361**	**341**	**398**
Part-time	Female	no.	0	1	1
	Male	no.	0	0	13
	Total	no.	**0**	**1**	**14**

EMPLOYEES BY EMPLOYMENT CONTRACT AS OF 31ST DECEMBER

Description	U.M.	2023	2024	2025
Total employees as of 31st December	no.	**361**	**342**	**412**

OTHER WORKERS AS OF 31ST DECEMBER

Description	U.M.	2023	2024	2025
Employees of other organisation	no.	7	12	34
Interns	no.	2	0	1
Outsourced workers	no.	35	14	63
Collaborators	no.	0	0	0
Employees of the associated companies	FTE	131	135	309

Notes: in the two-year period 2024-2025, all employees are employed in Italy, workers seconded from other companies are 5 women and 7 men in 2024 and 5 women and 29 men in 2025, while in the two-year period 2024-2025 the outsourced workers and employees of consortium member companies are all men. The internship launched in 2025 is for a woman. The 2024 and 2025 data relating to the employees of the associated companies was calculated starting from the hours worked by the employees of the associated companies divided by the average number of hours worked in a year.

GRI 2-7 E 2-8: INFORMATION ON EMPLOYEES AND OTHER WORKERS – CONSOLIDATED PERFORMANCE

EMPLOYEES BY EMPLOYMENT CONTRACT AS OF 31ST DECEMBER

Employment contract	Gender	U.M.	2023	2024	2025
Permanent	Female	no.	594	629	641
	Male	no.	1,413	1,494	1,567
	Total	no.	**2,007**	**2,123**	**2,208**
Fixed term	Female	no.	2	1	2
	Male	no.	86	21	38
	Total	no.	**88**	**22**	**40**

EMPLOYEES BY EMPLOYMENT CONTRACT AS OF 31ST DECEMBER

Contract type	Gender	U.M.	2023	2024	2025
Full-time	Female	no.	591	624	638
	Male	no.	1,498	1,514	1,591
	Total	no.	**2,089**	**2,138**	**2,229**
Part-time	Female	no.	5	6	5
	Male	no.	1	1	14
	Total	no.	**6**	**7**	**19**

EMPLOYEES BY EMPLOYMENT CONTRACT AS OF 31ST DECEMBER

Description	U.M.	2023	2024	2025
Total employees as of 31st December	no.	**2,095**	**2,145**	**2,248**

OTHER WORKERS AS OF 31ST DECEMBER

Description	U.M.	2023	2024	2025
Employees of other organisation	no.	8	14	34
Interns	no.	20	13	6
Outsourced workers	no.	49	35	126
Collaborators	no.	6	0	0
Employees of the associated companies	FTE	131	135	309

7.5.1.2 GRI 2-27 Compliance with laws and regulations

GRI 2-27 COMPLIANCE WITH LAWS AND REGULATIONS – OPEN FIBER S.P.A.

FINES FOR INSTANCES OF NONCOMPLIANCE WITH LAWS AND REGULATIONS

Description	U.M.	2023	2024	2025
Total number of fines for instances of noncompliance with laws and regulations that were paid	no.	0	1	3
Monetary value of fines for instances of noncompliance with laws and regulations that were paid	€/000	-	549.69	54.48

Notes: the significance criteria applied concerned criminal penalties and administrative or civil penalties for amounts exceeding €10,000.
The penalty paid in 2024 relates to seven assessment notices concerning the non-payment of COSAP (public land occupation fees) notified in June 2024 by the tax collection agency of the Municipality of Prato. These notices were paid by Open Fiber and the related amounts were recharged and invoiced to the contractors contractually obliged to make the payment.
The penalties paid in 2025 relate to:
- third-party attachment in July 2025 by Tresse Italia S.r.l., acting as the collection agency for the Municipality of Guidonia Montecelio, for non-payment of Highway Code penalties for the years 2022 and 2023. Open Fiber paid the amount on 17/07/2025;
- third-party garnishment in October 2025 by the collection agent La Spezia Risorse S.p.A. for non-payment of the temporary licence fee. Open Fiber paid the amount on 31st October 2025;
- payment order sent in December 2025 by Publiservizi S.r.l. on behalf of the Municipality of Caserta for violation of the Highway Code. Open Fiber made the relevant payment on 9th January 2026.

With reference to significant cases of non-compliance with laws and regulations, during the period 2023–2025 the following additional sanctions not yet paid are reported:
- a payment injunction in the amount of approximately EUR 720 thousand for the non-payment of the COSAP (fee for the occupation of public spaces and areas) for the year 2018, served on Open Fiber by the Municipality of Florence in January 2022. The injunction was challenged by Open Fiber before the Court of Florence, and the proceedings are still pending;
- five payment reminders received by Open Fiber in 2023 from Trentino Riscossioni S.p.A. for the non-payment of public land occupation fees, for a total amount of approximately EUR 470,000. A request for rectification of the amounts was submitted and a meeting was held with the Province and the collection company, following which the collection office did not advance any further claims;
- three payment notices received by Open Fiber in 2023 from SOGET S.p.A., on behalf of the Municipality of Trapani, following an alleged failure to pay public land occupation fees, for a total amount of approximately EUR 170,000. A request for rectification was submitted and a meeting was held with the Municipality and the collection company. Due to the Municipality's refusal to accept the rectification request, an appeal was filed before the Court of Trapani in September 2024, and the proceedings are currently pending;
- a payment injunction sent by the Municipality of Nuoro in October 2024 for the non-payment of the Single OSAP Fee (Canone Unico OSAP) in the amount of EUR 62,578.50. Open Fiber filed an opposition before the Court of Nuoro, and the proceedings are currently pending;
- 13 notices of violation issued by the Municipal Police of the Municipality of Sant'Arpino in March 2025 for violations of the Highway Code, amounting to EUR 12,000. Open Fiber lodged an appeal with the Prefect of the relevant Municipality seeking annulment of these notices, and the proceedings are currently pending;
- a notice of assessment sent by the Municipality of Rionero Sannitico in March 2025 for the non-payment of the temporary CUP (Single Property Fee), amounting to approximately EUR 32,500. Open Fiber challenged the relevant notice of assessment, and the proceedings are currently pending;
- a notice of assessment sent by the Province of Foggia in April 2025 for the payment of the temporary CUP in the amount of EUR 1,556,420.55 for the years 2021–2025. Open Fiber filed an opposition against this notice, and the proceedings are currently pending;
- a payment order (injunction decree) sent by the Metropolitan City of Messina in April 2025 for the non-payment of the temporary CUP, amounting to EUR 498,709.34. Open Fiber filed an opposition against this decree, and the proceedings are currently pending;
- a third-party garnishment initiated in December 2025 by the Municipality of Caiazzo for the non-payment of nine Highway Code penalties, amounting to approximately EUR 23,000. Open Fiber submitted a request for access to documents to verify proper service of the notices and is awaiting a response from the Municipality.

GRI 2-27 COMPLIANCE WITH LAWS AND REGULATIONS – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

FINES FOR INSTANCES OF NONCOMPLIANCE WITH LAWS AND REGULATIONS

Description	U.M.	2023	2024	2025
Total number of fines for instances of noncompliance with laws and regulations that were paid	no.	0	2	0
Monetary value of fines for instances of noncompliance with laws and regulations that were paid	€/000	-	235	-

Notes: the materiality criteria applied concerned criminal sanctions and administrative or civil sanctions with amounts exceeding EUR 10,000.
The sanctions paid in 2024 relate to the following:
- a sanction for non-compliance with occupational safety regulations in connection with construction site activities, imposed in March 2024 by the Municipality of Isola d'Asti in the amount of EUR 20,002. OFNS proceeded with payment on 24th July 2024;
- a sanction for failure to pay employees' severance pay (TFR) contributions to the INPS Treasury Fund, imposed in May 2024 by INPS in the amount of EUR 215,000. OFNS proceeded with payment on 21st June 2024. In parallel, in June 2024 OFNS filed an appeal, following which INPS undertook to recalculate some of the amounts paid. Discussions between OFNS and INPS are currently ongoing.

7.5.2 AFFECTED COMMUNITIES

7.5.2.1 GRI 201 Economic performance

GRI 201-1: DIRECT ECONOMIC VALUE GENERATED AND DISTRIBUTED – CONSOLIDATED PERFORMANCE

DIRECT ECONOMIC VALUE GENERATED AND DISTRIBUTED

Description	U.M.	2023	2024	2025
ECONOMIC VALUE GENERATED	**€/000**	**582,295**	**679,370**	**798,515**
Value of production	€/000	581,501	674,798	798,058
Income from investments	€/000	-	-	-
Other types of financial income	€/000	794	4,572	457
Extraordinary income	€/000	-	-	-
ECONOMIC VALUE DISTRIBUTED	**€/000**	**531,804**	**610,323**	**641,732**
Operating costs	**€/000**	**219,440**	**246,656**	**252,990**
Costs for raw materials	€/000	-	-	-
Costs for services	€/000	197,653	219,204	229,487
Costs for using third-party goods	€/000	7,178	5,961	8,947
Changes in inventory of raw materials	€/000	-	-	-
Other operating expenses (net of taxes)	€/000	14,609	21,492	14,555
Extraordinary expenses	€/000	-	-	-
Value distributed to employees	**€/000**	**102,016**	**110,017**	**99,282**
Costs for personnel	€/000	102,016	110,017	99,282
Value distributed to capital providers	**€/000**	**264,581**	**314,686**	**381,809**
Interest and other financial charges	€/000	264,581	314.686	381,809
Value distributed to the Public Administration	**€/000**	**(54,638)**	**(61,488)**	**(92,937)**
Income taxes (current and prepaid)	€/000	(60,288)	(68,746)	(102,058)
Miscellaneous operating costs (only the value of taxes)	€/000	5,650	7,257	9,121
Value distributed to shareholders	**€/000**	**-**	**-**	**-**
Dividends distributed	€/000	-	-	-
Value distributed to the community	**€/000**	**405**	**451**	**588**
Generosities	€/000	14	10	15
Sponsorships	€/000	-	-	-
Membership fees	€/000	391	441	574
ECONOMIC VALUE RETAINED	**€/000**	**50,491**	**69,047**	**156,783**
Profit (or loss) for the year (net of dividends)	€/000	(296,304)	(363,920)	(336,689)
Write-downs and provisions	€/000	19,462	43,149	26,556
Depreciations/amortisations	€/000	327,333	389,819	466,917
Deferred taxes	€/000	-	-	-
ECONOMIC VALUE GENERATED	**€/000**	**582,295**	**679,370**	**798,515**
DISTRIBUTED ECONOMIC VALUE	**€/000**	**531,804**	**610,323**	**641,732**
ECONOMIC VALUE RETAINED	**€/000**	**50,490**	**69,047**	**156,783**

GRI 201-4: FINANCIAL ASSISTANCE RECEIVED FROM THE GOVERNMENT – OPEN FIBER S.P.A

FINANCIAL ASSISTANCE RECEIVED FROM THE GOVERNMENT

Description	U.M.	2023	2024	2025
Monetary value of financial assistance received from the public organisation	€/000	182,595	211,539	191,978

Notes: here are reported the contributions received from Infratel Italia S.p.A. (an in-house company of the Ministry of Enterprise and Made in Italy) for the development of Ultra Broadband in market failure areas (BUL Strategic Plan). Monetary values shown refer to the amounts collected. More details can be found at https://bandaultralarga.italia.it/aree-bianche/intervento-a-concessione/

7.5.2.2 GRI 413 Local Communities

GRI 413-1: OPERATIONS WITH LOCAL COMMUNITY ENGAGEMENT, IMPACT ASSESSMENTS, AND DEVELOPMENT PROGRAMMES – OPEN FIBER S.P.A.

OPERATIONS WITH LOCAL COMMUNITY ENGAGEMENT, IMPACT ASSESSMENTS, AND DEVELOPMENT PROGRAMMES

Description	U.M.	2023	2024	2025
Operations with local community engagement, impact assessments, and/or development programmes	%	100%	100%	100%

Notes: 100% of infrastructure implementation activities involve local community engagement on at least one of the following: social impact screenings, environmental impact screenings and ongoing monitoring, public dissemination of the results of environmental and social impact screenings; local community development programmes based on local community needs; stakeholder engagement plans based on stakeholder mapping; consultation committees open to the local community and processes that include vulnerable groups; enterprise committees, Occupational Safety and Health committees, and other worker representative bodies to address impacts; and formal processes for handling complaints from the local community.

7.5.3 BUSINESS CONDUCT

7.5.3.1 GRI 205 Anti-corruption

GRI 205-1: OPERATIONS ASSESSED FOR RISKS RELATED TO CORRUPTION – OPEN FIBER S.P.A.

OPERATIONS ASSESSED FOR RISKS RELATED TO CORRUPTION

Description	U.M.	2023	2024	2025
Total processes	n.	14	16	16
Processes assessed for risks related to corruption	n.	14	16	16

OPERATIONS ASSESSED FOR RISKS RELATED TO CORRUPTION

Description	U.M.	2023	2024	2025
Processes assessed for risks related to corruption	**%**	**100%**	**100%**	**100%**

Notes: upon completion of the Risk Assessment 231 activities, the update of the OMM 231 was approved on 18th May 2023. Following organizational changes, two new Directorates were introduced in 2024 with the consequent definition of two further processes relevant for the purposes of Legislative Decree 231/01.
The significant corruption-related risks identified during the risk assessment are those inherent to public and private corruption as defined by Legislative Decree 231/01. The number of corporate processes is identified by the departments identified by means of a first-level Organisational Provision.
In 2025, the previous year's Risk Assessment 231 was confirmed, as the related update project was launched during the year and has not yet been completed.

GRI 205-1: OPERATIONS ASSESSED FOR RISKS RELATED TO CORRUPTION – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

OPERATIONS ASSESSED FOR RISKS RELATED TO CORRUPTION

Description	U.M.	2023	2024	2025
Total processes	n.	10	10	10
Processes assessed for risks related to corruption	n.	10	10	10
Processes assessed for risks related to corruption	**%**	**100%**	**100%**	**100%**

Notes: upon completion of the first Risk Assessment 231, the OMM 231 was approved on 11th May 2024.

GRI 205-2: COMMUNICATION AND TRAINING ABOUT ANTI-CORRUPTION POLICIES AND PROCEDURES – OPEN FIBER S.P.A.

EMPLOYEES WHO HAVE RECEIVED ANTI-CORRUPTION TRAINING

Description	U.M.	2023	2024	2025
Executives trained	n.	7	62	24
Percentage of Executives trained	**%**	**12%**	**102%**	**34%**
Middle Managers trained	n.	26	186	23
Percentage of Middle Managers trained	**%**	**16%**	**102%**	**12%**
Office Workers trained	n.	304	1.593	467
Percentage of Office Workers trained	**%**	**20%**	**102%**	**30%**
Total employees trained	**n.**	**337**	**1.841**	**514**

Notes: in the year 2024 there is a significant increase compared to the previous year, since the courses being analyzed were updated during the year and used by the entire company population. The calculation of trained employees also includes those who were resigned during the two-years period 2024-2025 as they were actually trained, which is why the 2024 percentages exceed 100%. As a result of the updating and use of training content during 2024, the number of hours and employees trained decreased in 2025.

GRI 205-2: COMMUNICATION AND TRAINING ABOUT ANTI-CORRUPTION POLICIES AND PROCEDURES – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

EMPLOYEES WHO HAVE RECEIVED ANTI-CORRUPTION TRAINING

Description	U.M.	2023	2024	2025
Executives trained	n.	0	0	0
Percentage of Executives trained	**%**	**0%**	**0%**	**0%**
Middle Managers trained	n.	0	4	9
Percentage of Middle Managers trained	**%**	**0%**	**80%**	**100%**
Office Workers trained	n.	2	44	91
Percentage of Office Workers trained	**%**	**4%**	**61%**	**95%**
Laborers trained	n.	0	196	274
Percentage of Laborers trained	**%**	**0%**	**74%**	**89%**
Total employees trained	**n.**	**2**	**244**	**374**

Notes: anti-corruption training was provided starting from December 2023 through content available within the Company Learning Management System. Training continued to be provided during 2024 and 2025, resulting in a significant increase in the number of employees trained compared to 2023. Those resigned in 2024 and 2025 were also included in the calculation of OFNS employees trained, in line with what was done for Open Fiber.

GRI 205-2: COMMUNICATION AND TRAINING ABOUT ANTI-CORRUPTION POLICIES AND PROCEDURES – CONSOLIDATED PERFORMANCE

EMPLOYEES WHO HAVE RECEIVED ANTI-CORRUPTION TRAINING

Description	U.M.	2023	2024	2025
Executives trained	no.	7	62	24
Percentage of Executives trained	**%**	**12%**	**100%**	**34%**
Middle Managers trained	no.	26	190	32
Percentage of Middle Managers trained	**%**	**15%**	**102%**	**16%**
Office Workers trained	no.	306	1,637	558
Percentage of Office Workers trained	**%**	**20%**	**100%**	**33%**
Laborers trained	no.	0	196	274
Percentage of Laborers trained	**%**	**0%**	**74%**	**40%**
Total employees trained	**no.**	**339**	**2,085**	**888**

Notes: the calculation of Open Fiber and OFNS employees trained also includes those resigned in 2024-2025, which is why the 2024 percentages exceed 100%.

7.5.4 OWN WORKFORCE

7.5.4.1 GRI 401 Employment

GRI 401-1: NEW EMPLOYEE HIRES AND EMPLOYEE TURNOVER – OPEN FIBER S.P.A.

NEW EMPLOYEE HIRES SINCE 1ST JANUARY TO 31ST DECEMBER

Description	Age group	U.M.	2023	2024	2025
New employee hires by age group	< 30 years old	no.	75	78	42
	Between 30 and 50 years old	no.	189	101	63
	> 50 years old	no.	19	14	13
New employee hires by gender	Female	no.	110	77	39
	Male	no.	173	116	79
Total new employee hires		**no.**	**283**	**193**	**118**
Rate of employee hires by age group	< 30 years old	%	31%	33%	19%
	Between 30 and 50 years old	%	78%	42%	29%
	> 50 years old	%	8%	6%	6%
Rate of employee hires by gender	Female	%	19%	13%	6%
	Male	%	15%	10%	6%
Total rate of employee hires		**%**	**16%**	**11%**	**6%**

TERMINATIONS OF EMPLOYMENT FROM 1ST JANUARY TO 31ST DECEMBER

Gender	Age group	U.M.	2023	2024	2025
Terminations of employment by age group	< 30 years old	no.	25	25	20
	Between 30 and 50 years old	no.	84	83	57
	> 50 years old	no.	11	16	8
Terminations of employment by gender	Female	no.	42	48	31
	Male	no.	78	76	54
Total terminations		**no.**	**120**	**124**	**85**
Turnover rate by age group	< 30 years old	%	10%	11%	9%
	Between 30 and 50 years old	%	6%	6%	4%
	> 50 years old	%	6%	6%	3%
Turnover rate by gender	Female	%	7%	8%	5%
	Male	%	7%	6%	4%
Total turnover rate		**%**	**7%**	**7%**	**5%**

Notes: the rate of employee hires was calculated as the number of employees hired during the reporting period compared to the total number of employees at the end of the reporting period. The turnover rate was calculated as the number of terminations during the reporting period compared to the total number of employees at the end of the reporting period.

GRI 401-1: NEW EMPLOYEE HIRES AND EMPLOYEE TURNOVER – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L

NEW EMPLOYEE HIRES SINCE 1ST JANUARY TO 31ST DECEMBER

Description	Age group	U.M.	2023	2024	2025
New employee hires by age group	< 30 years old	no.	115	35	37
	Between 30 and 50 years old	no.	112	59	75
	> 50 years old	no.	34	21	32
New employee hires by gender	Female	no.	13	10	7
	Male	no.	248	105	137
Total new employee hires		**no.**	**261**	**115**	**144**
Rate of employee hires by age group	< 30 years old	%	80%	33%	33%
	Between 30 and 50 years old	%	70%	34%	35%
	> 50 years old	%	58%	34%	39%
Rate of employee hires by gender	Female	%	76%	45%	26%
	Male	%	72%	33%	36%
Total rate of employee hires		**%**	**72%**	**34%**	**35%**

TERMINATIONS OF EMPLOYMENT FROM 1ST JANUARY TO 31ST DECEMBER

Gender	Age group	U.M.	2023	2024	2025
Terminations of employment by age group	< 30 years old	no.	52	59	17
	Between 30 and 50 years old	no.	69	58	38
	> 50 years old	no.	33	17	19
Terminations of employment by gender	Female	no.	5	5	2
	Male	no.	149	129	72
Total terminations		**no.**	**154**	**134**	**74**
Turnover rate by age group	< 30 years old	%	36%	56%	15%
	Between 30 and 50 years old	%	43%	33%	18%
	> 50 years old	%	56%	27%	23%
Turnover rate by gender	Female	%	29%	23%	7%
	Male	%	43%	40%	19%
Total turnover rate		**%**	**43%**	**39%**	**18%**

Notes: the rate of employee hires was calculated as the number of employees hired during the reporting period compared to the total number of employees at the end of the reporting period. The turnover rate was calculated as the number of terminations during the reporting period compared to the total number of employees at the end of the reporting period.

GRI 401-1: NEW EMPLOYEE HIRES AND EMPLOYEE TURNOVER – CONSOLIDATED PERFORMANCE

NEW EMPLOYEE HIRES SINCE 1ST JANUARY TO 31ST DECEMBER

Description	Age group	U.M.	2023	2024	2025
New employee hires by age group	< 30 years old	no.	190	113	79
	Between 30 and 50 years old	no.	301	160	138
	> 50 years old	no.	53	35	45
New employee hires by gender	Female	no.	123	87	46
	Male	no.	421	221	216
Total new employee hires		**no.**	**544**	**308**	**262**
Rate of employee hires by age group	< 30 years old	%	49%	33%	24%
	Between 30 and 50 years old	%	78%	47%	42%
	> 50 years old	%	14%	10%	14%
Rate of employee hires by gender	Female	%	21%	14%	7%
	Male	%	28%	15%	13%
Total rate of employee hires		**%**	**26%**	**14%**	**12%**

TERMINATIONS OF EMPLOYMENT FROM 1ST JANUARY TO 31ST DECEMBER

Gender	Age group	U.M.	2023	2024	2025
Terminations of employment by age group	< 30 years old	no.	77	84	37
	Between 30 and 50 years old	no.	153	141	95
	> 50 years old	no.	44	33	27
Terminations of employment by gender	Female	no.	47	53	33
	Male	no.	227	205	126
Total terminations		**no.**	**274**	**258**	**159**
Turnover rate by age group	< 30 years old	%	20%	24%	11%
	Between 30 and 50 years old	%	11%	10%	6%
	> 50 years old	%	17%	10%	7%
Turnover rate by gender	Female	%	8%	8%	5%
	Male	%	15%	14%	8%
Total turnover rate		**%**	**13%**	**12%**	**7%**

Notes: the rate of employee hires was calculated as the number of employees hired during the reporting period compared to the total number of employees at the end of the reporting period. The turnover rate was calculated as the number of terminations during the reporting period compared to the total number of employees at the end of the reporting period.

GRI 401-3: PARENTAL LEAVE – OPEN FIBER S.P.A.

EMPLOYEES THAT WERE ENTITLED TO PARENTAL LEAVE IN THE REPORTING YEAR

Description	U.M.	2023	2024	2025
Employees that were entitled to maternity leave	no.	579	608	616
Employees that were entitled to paternity leave	no.	1,155	1,195	1,220
Total	**no.**	**1,734**	**1,803**	**1,836**

EMPLOYEES THAT TOOK PARENTAL LEAVE IN THE REPORTING YEAR

Description	U.M.	2023	2024	2025
Employees that took maternity leave	no.	44	53	58
Employees that took paternity leave	no.	67	69	64
Total	**no.**	**111**	**122**	**122**

EMPLOYEES THAT RETURNED TO WORK AFTER PARENTAL LEAVE ENDED THAT WERE STILL EMPLOYED 12 MONTHS AFTER THEIR RETURN TO WORK

Description	U.M.	2023	2024	2025
Employees that returned to work after the maternity leave ended	n.	26	37	39
Employees that returned to work after the paternity leave ended	n.	65	69	62
Total	**n.**	**91**	**106**	**101**

EMPLOYEES THAT RETURNED TO WORK AFTER PARENTAL LEAVE ENDED THAT WERE STILL EMPLOYED 12 MONTHS AFTER THEIR RETURN TO WORK

Description	U.M.	2023	2024	2025
Employees that returned to work after maternity leave ended that were still employed 12 months after their return to work	no.	25	25	37
Employees that returned to work after paternity leave ended that were still employed 12 months after their return to work	no.	42	62	66
Total	**no.**	**67**	**87**	**103**

EMPLOYEES THAT WERE DUE TO RETURN TO WORK AFTER TAKING PARENTAL LEAVE

Description	U.M.	2023	2024	2025
Employees that were due to return to work after taking maternity leave	n.	44	53	58
Employees that were due to return to work after taking paternity leave	n.	67	69	64
Total	**n.**	**111**	**122**	**122**

RETURN TO WORK RATE

Description	U.M.	2023	2024	2025
Female	%	59%	70%	67%
Male	%	97%	100%	97%
Total	**%**	**82%**	**87%**	**83%**

RETENTION RATE

Description	U.M.	2023	2024	2025
Female	%	86%	96%	100%
Male	%	98%	95%	96%
Total	**%**	**93%**	**96%**	**97%**

GRI 401-3: PARENTAL LEAVE – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

EMPLOYEES THAT WERE ENTITLED TO PARENTAL LEAVE IN THE REPORTING YEAR

Description	U.M.	2023	2024	2025
Employees that were entitled to maternity leave	no.	17	22	27
Employees that were entitled to paternity leave	no.	344	320	385
Total	**no.**	**361**	**342**	**412**

EMPLOYEES THAT TOOK PARENTAL LEAVE IN THE REPORTING YEAR

Description	U.M.	2023	2024	2025
Employees that took maternity leave	no.	0	0	1
Employees that took paternity leave	no.	8	8	5
Total	**no.**	**8**	**8**	**6**

EMPLOYEES THAT RETURNED TO WORK AFTER PARENTAL LEAVE ENDED THAT WERE STILL EMPLOYED 12 MONTHS AFTER THEIR RETURN TO WORK

Description	U.M.	2023	2024	2025
Employees that returned to work after the maternity leave ended	no.	0	0	0
Employees that returned to work after the paternity leave ended	no.	7	7	10
Total	**no.**	**7**	**7**	**10**

EMPLOYEES THAT RETURNED TO WORK AFTER PARENTAL LEAVE ENDED THAT WERE STILL EMPLOYED 12 MONTHS AFTER THEIR RETURN TO WORK

Description	U.M.	2023	2024	2025
Employees that returned to work after maternity leave ended that were still employed 12 months after their return to work	no.	-	0	0
Employees that returned to work after paternity leave ended that were still employed 12 months after their return to work	no.	-	7	4
Total	**no.**	**-**	**7**	**4**

EMPLOYEES THAT WERE DUE TO RETURN TO WORK AFTER TAKING PARENTAL LEAVE

Description	U.M.	2023	2024	2025
Employees that were due to return to work after taking maternity leave	no.	0	0	0
Employees that were due to return to work after taking paternity leave	no.	8	8	11
Total	**no.**	**8**	**8**	**11**

RETURN TO WORK RATE

Description	U.M.	2023	2024	2025
Female	%	0%	0%	0%
Male	%	88%	88%	91%
Total	**%**	**88%**	**88%**	**91%**

RETENTION RATE

Description	U.M.	2023	2024	2025
Female	%	-	0%	0%
Male	%	-	100%	57%
Total	**%**	**-**	**100%**	**57%**

GRI 401-3: PARENTAL LEAVE – CONSOLIDATED PERFORMANCE

EMPLOYEES THAT WERE ENTITLED TO PARENTAL LEAVE IN THE REPORTING YEAR

Description	U.M.	2023	2024	2025
Employees that were entitled to maternity leave	no.	596	630	643
Employees that were entitled to paternity leave	no.	1,499	1,515	1,605
Total	**no.**	**2,095**	**2,145**	**2,248**

EMPLOYEES THAT TOOK PARENTAL LEAVE IN THE REPORTING YEAR

Description	U.M.	2023	2024	2025
Employees that took maternity leave	no.	44	53	59
Employees that took paternity leave	no.	75	77	69
Total	**no.**	**119**	**130**	**128**

EMPLOYEES THAT RETURNED TO WORK AFTER PARENTAL LEAVE ENDED THAT WERE STILL EMPLOYED 12 MONTHS AFTER THEIR RETURN TO WORK

Description	U.M.	2023	2024	2025
Employees that returned to work after the maternity leave ended	no.	26	37	39
Employees that returned to work after the paternity leave ended	no.	72	76	72
Total	**no.**	**98**	**113**	**111**

EMPLOYEES THAT RETURNED TO WORK AFTER PARENTAL LEAVE ENDED THAT WERE STILL EMPLOYED 12 MONTHS AFTER THEIR RETURN TO WORK

Description	U.M.	2023	2024	2025
Employees that returned to work after maternity leave ended that were still employed 12 months after their return to work	no.	-	25	37
Employees that returned to work after paternity leave ended that were still employed 12 months after their return to work	no.	-	69	70
Total	**no.**	**-**	**94**	**107**

EMPLOYEES THAT WERE DUE TO RETURN TO WORK AFTER TAKING PARENTAL LEAVE

Description	U.M.	2023	2024	2025
Employees that were due to return to work after taking maternity leave	no.	44	53	58
Employees that were due to return to work after taking paternity leave	no.	75	77	75
Total	**no.**	**119**	**130**	**133**

RETURN TO WORK RATE

Description	U.M.	2023	2024	2025
Female	%	59%	70%	67%
Male	%	96%	99%	96%
Total	**%**	**82%**	**87%**	**83%**

RETENTION RATE

Description	U.M.	2023	2024	2025
Female	%	-	96%	100%
Male	%	-	96%	92%
Total	**%**	**-**	**96%**	**95%**

7.5.4.2 GRI 403 Occupational Health and Safety

GRI 403-5: WORKER TRAINING ON OCCUPATIONAL HEALTH AND SAFETY – OPEN FIBER S.P.A.

HOURS OF TRAINING ON OCCUPATIONAL HEALTH AND SAFETY AND ENVIRONMENTAL PROTECTION – OPEN FIBER EMPLOYEES

Description	U.M.	2023	2024	2025
Total number of hours of training on Health, Safety and Environment (HSE)	h	25,801	19,825	14,961
Average hours of training on HSE per employee	h/ employee	15	11	8

HOURS OF TRAINING ON OCCUPATIONAL HEALTH AND SAFETY AND ENVIRONMENTAL PROTECTION – OPEN FIBER EMPLOYEES + OTHER PERSONNEL

Description	U.M.	2023	2024	2025
Total number of hours of training on Health, Safety and Environment (HSE)	h	26,807	20,494	16,450

Notes: Health, Safety and Environment training includes: mandatory HSE training and necessary HSE training, HSE management system pills and pills promoted by the HSE function.
During the two-year period 2024-2025, HSE training campaigns targeted a specific population based on role and/or function, requiring less effort in terms of training hours/editions compared to 2023.
Training for other personnel does not include training provided to contractors and subcontractors involved in network construction and management activities (Creation, Delivery & Assurance).

GRI 403-5: WORKER TRAINING ON OCCUPATIONAL HEALTH AND SAFETY – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

HOURS OF TRAINING ON OCCUPATIONAL HEALTH AND SAFETY AND ENVIRONMENTAL PROTECTION – OPEN FIBER NETWORK SOLUTIONS EMPLOYEES

Description	U.M.	2023	2024	2025
Total number of hours of training on Health, Safety and Environment (HSE)	h	23,558	6,312	6,849
Average hours of training on HSE per employee	h/ employee	65	18	17

Notes: the value for 2024 is lower than that for 2023, as the number of new employees hired has decreased, from 261 in the previous year to 115 in 2024. Furthermore, since 2024, the number of employees requiring training courses with a higher number of hours has stabilised within the company.
In 2025, there will be a slight increase compared to 2024, linked to training carried out at Prevention and Protection Service and Territorial areas on environmental issues and legislative updates (State-Regions Conference).

GRI 403-5: WORKER TRAINING ON OCCUPATIONAL HEALTH AND SAFETY – CONSOLIDATED PERFORMANCE

HOURS OF TRAINING ON OCCUPATIONAL HEALTH AND SAFETY AND ENVIRONMENTAL PROTECTION – OPEN FIBER AND OPEN FIBER NETWORK SOLUTIONS EMPLOYEES

Description	U.M.	2023	2024	2025
Total number of hours of training on Health, Safety and Environment (HSE)	h	49,359	26,137	21,810
Average hours of training on HSE per employee	h/ employee	24	12	10

HOURS OF TRAINING ON OCCUPATIONAL HEALTH AND SAFETY AND ENVIRONMENTAL PROTECTION – OPEN FIBER AND OPEN FIBER NETWORK SOLUTIONS EMPLOYEES + OTHER PERSONNEL

Description	U.M.	2023	2024	2025
Total number of hours of training on Health, Safety and Environment (HSE)	h	50,365	26,806	23,299

GRI 403-9: WORK-RELATED INJURIES – OPEN FIBER S.P.A.

OPEN FIBER EMPLOYEES

Description		U.M.	2023	2024	2025
Hours worked		h	2,881,118	2,946,958	2,920,404
Lost Time Injuries (including fatalities)	**Total number**	**no.**	**0**	**0**	**0**
	With high consequences*	no.	0	0	0
	Fatalities	no.	0	0	0
Commuting injuries**		no.	9	8	9
Lost time injuries Frequency rate		-	0.00	0.00	0.00
Lost Time Injuries Frequency Rate (including commuting injuries)		-	3.12	2.71	3.08
Frequency rate for lost time injuries with high-consequences		-	0.00	0.00	0.00
Frequency rate of work-related fatalities		-	0.00	0.00	0.00
Main types of injuries		-			

Notes:
* > 6 months of absence excluding deaths. Injuries with a prognosis of more than 180 days as of 31/12 are taken into account.
** Accidents that occur on the way between the workplace and a place belonging to the private sphere.

GRI 403-9: WORK-RELATED INJURIES – OPEN FIBER S.P.A.

WORKERS WHO ARE NOT EMPLOYEES, BUT WHOSE WORK AND/OR PLACE OF WORK IS UNDER THE CONTROL OF THE COMPANY

Description		U.M.	2023	2024	2025
Hours worked		h	15,289,678	19,899,368	22,686,186
Lost Time Injuries (including fatalities)	**Total number**	**n.**	**39**	**39**	**22**
	With high consequences*	n.	2	0	0
	Fatalities	n.	0	1	0
Commuting injuries**		n.	-	-	-
Lost time injuries Frequency rate		-	2.55	1.96	0.97
Frequency rate for lost time injuries with high-consequences		-	0.13	0.00	0.00
Frequency rate of work-related fatalities		-	0.00	0.05	0.00
Main types of injuries	Investment: the activities are carried out on roads or on the side or very close to roads and ordinary road traffic in urban and extra-urban contexts. The small size of the worksite areas entails risks for workers who can be run over by work vehicles or by vehicles outside the worksite area (cars). Crushed limbs/shocks/impacts: among the most frequent activities is the opening and closing of manhole covers, generally made of cast iron and with a "segmented" opening. This activity exposes the worker to the risk of shocks, impacts and crushing of limbs if performed incorrectly.				

Notes:
* > 6 months of absence excluding deaths. Injuries with a prognosis of more than 180 days as of 31/12 are taken into account.
** accidents that occur on the way between the workplace and a place belonging to the private sphere. Commuting injuries of third-party personnel are not reported as the commute do not reflect the activities carried out under the existing contracts.
With reference to companies operating in Creation, Delivery & Assurance activities, the estimated number of FTEs for the year 2023 is 7,670, for the year 2024 is 9,885 and for the year 2025 is 11,258. Such perimeter includes the direct personnel of Open Fiber Network Solutions.

OVERALL PERFORMANCE (OPEN FIBER EMPLOYEES AND WORKERS WHO ARE NOT EMPLOYEES, BUT WHOSE WORK AND/OR PLACE OF WORK IS UNDER THE CONTROL OF THE COMPANY)

Description	U.M.	2023	2024	2025
Lost time injuries Frequency rate	-	2.15	1.71	0.86
Frequency rate for lost time injuries with high-consequences	-	0.11	0.00	0.00
Frequency rate of work-related fatalities	-	0.00	0.04	0.00

GRI 403-9: WORK-RELATED INJURIES – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

OPEN FIBER EMPLOYEES

Description		U.M.	2023	2024	2025
Hours worked		no.	442,162	570,862	621,571
Lost Time Injuries (including fatalities)	**Total number**	**no.**	**15**	**11**	**6**
	With high consequences*	no.	0	0	0
	Fatalities	no.	0	0	0
Commuting injuries**		n.	3	2	0
Lost time injuries Frequency rate		-	33.92	19.27	9.65
Lost Time Injuries Frequency Rate (including commuting injuries)		-	40.71	22.77	9.65
Frequency rate for lost time injuries with high-consequences		-	0.00	0.00	0.00
Frequency rate of work-related fatalities		-	0.00	0.00	0.00
Main types of injuries	Investment: the activities are carried out on roads or on the side or very close to roads and ordinary road traffic in urban and extra-urban contexts. The small size of the worksite areas entails risks for workers who can be run over by work vehicles or by vehicles outside the worksite area (cars). Crushed limbs/shocks/impacts: among the most frequent activities is the opening and closing of manhole covers, generally made of cast iron and with a "segmented" opening. This activity exposes the worker to the risk of shocks, impacts and crushing of limbs if performed incorrectly.				

Notes:
* > 6 months of absence excluding deaths. Injuries with a prognosis of more than 180 days as of 31/12 are taken into account.
** accidents that occur on the way between the workplace and a place belonging to the private sphere.

GRI 403-9: WORK-RELATED INJURIES – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

WORKERS WHO ARE NOT EMPLOYEES, BUT WHOSE WORK AND/OR PLACE OF WORK IS UNDER THE CONTROL OF THE COMPANY

Description		U.M.	2023	2024	2025
Hours worked		h	374,612	272,212	1,139,732
Lost Time Injuries (including fatalities)	**Total number**	**n.**	**12**	**6**	**4**
	With high consequences*	n.	0	0	0
	Fatalities	n.	0	0	0
Commuting injuries**		n.	0	1	1
Lost time injuries Frequency rate		-	32.03	22.04	3.51
Frequency rate for lost time injuries with high-consequences		-	0.00	0.00	0.00
Frequency rate of work-related fatalities		-	0.00	0.00	0.00
Main types of injuries	Investment: the activities are carried out on roads or on the side or very close to roads and ordinary road traffic in urban and extra-urban contexts. The small size of the worksite areas entails risks for workers who can be run over by work vehicles or by vehicles outside the worksite area (cars). Crushed limbs/shocks/impacts: among the most frequent activities is the opening and closing of manhole covers, generally made of cast iron and with a "segmented" opening. This activity exposes the worker to the risk of shocks, impacts and crushing of limbs if performed incorrectly.				

Notes:
* > 6 months of absence excluding deaths. Injuries with a prognosis of more than 180 days as of 31/12 are taken into account.
** accidents that occur on the way between the workplace and a place belonging to the private sphere.

OVERALL PERFORMANCE (OPEN FIBER NETWORK SOLUTIONS EMPLOYEES AND WORKERS WHO ARE NOT EMPLOYEES, BUT WHOSE WORK AND/OR PLACE OF WORK IS UNDER THE CONTROL OF THE COMPANY)

Description	U.M.	2023	2024	2025
Lost time injuries Frequency rate	-	33.06	20.16	5.68
Frequency rate for lost time injuries with high-consequences	-	0.00	0.00	0.00
Frequency rate of work-related fatalities	-	0.00	0.00	0.00

GRI 403-9: WORK-RELATED INJURIES – CONSOLIDATED PERFORMANCE

OPEN FIBER EMPLOYEES

Description		U.M.	2023	2024	2025
Hours worked		h	3,323,280	3,517,820	3,541,975
Lost Time Injuries (including fatalities)	**Total number**	**no.**	**15**	**11**	**6**
	With high consequences*	no.	0	0	0
	Fatalities	no.	0	0	0
Commuting injuries**		no.	12	10	9
Lost time injuries Frequency rate		-	4.51	3.13	1.69
Lost Time Injuries Frequency Rate (including commuting injuries)		-	8.12	5.97	4.23
Frequency rate for lost time injuries with high-consequences		-	0.00	0.00	0.00
Frequency rate of work-related fatalities		-	0.00	0.00	0.00
Main types of injuries	Investment: the activities are carried out on roads or on the side or very close to roads and ordinary road traffic in urban and extra-urban contexts. The small size of the worksite areas entails risks for workers who can be run over by work vehicles or by vehicles outside the worksite area (cars). Crushed limbs/shocks/impacts: among the most frequent activities is the opening and closing of manhole covers, generally made of cast iron and with a "segmented" opening. This activity exposes the worker to the risk of shocks, impacts and crushing of limbs if performed incorrectly.				

Notes:
* > 6 months of absence excluding deaths. Injuries with a prognosis of more than 180 days as of 31/12 are taken into account.
** accidents that occur on the way between the workplace and a place belonging to the private sphere.

GRI 403-9: WORK-RELATED INJURIES – CONSOLIDATED PERFORMANCE

WORKERS WHO ARE NOT EMPLOYEES, BUT WHOSE WORK AND/OR PLACE OF WORK IS UNDER THE CONTROL OF THE COMPANY

Description		U.M.	2023	2024	2025
Hours worked		h	14,847,516	19,434,728	22,064,615
Lost Time Injuries (including fatalities)	**Total number**	**no.**	**24**	**28**	**16**
	With high consequences*	no.	2	0	0
	Fatalities	no.	0	1	0
Commuting injuries**		no.	-	-	-
Lost time injuries Frequency rate		-	1.62	1.44	0.73
Frequency rate for lost time injuries with high-consequences		-	0.13	0.00	0.00
Frequency rate of work-related fatalities		-	0.00	0.00	0.00
Main types of injuries	Investment: the activities are carried out on roads or on the side or very close to roads and ordinary road traffic in urban and extra-urban contexts. The small size of the worksite areas entails risks for workers who can be run over by work vehicles or by vehicles outside the worksite area (cars). Crushed limbs/shocks/impacts: among the most frequent activities is the opening and closing of manhole covers, generally made of cast iron and with a "segmented" opening. This activity exposes the worker to the risk of shocks, impacts and crushing of limbs if performed incorrectly.				

Notes:
* > 6 months of absence excluding deaths. Injuries with a prognosis of more than 180 days as of 31/12 are taken into account.
** accidents that occur on the way between the workplace and a place belonging to the private sphere. Commuting injuries of third-party personnel are not reported as the commute do not reflect the activities carried out under the existing contracts.

OVERALL PERFORMANCE (OPEN FIBER, OPEN FIBER NETWORK SOLUTIONS EMPLOYEES AND WORKERS WHO ARE NOT EMPLOYEES, BUT WHOSE WORK AND/OR PLACE OF WORK IS UNDER THE CONTROL OF THE COMPANY)

Description	U.M.	2023	2024	2025
Lost time injuries Frequency rate	-	2.15	1.71	0.86
Frequency rate for lost time injuries with high-consequences	-	0.11	0.00	0.00
Frequency rate of work-related fatalities	-	0.00	0.04	0.00

Standards, methodologies, and conversion factors
The frequency indexes were calculated on the basis of 1,000,000 hours worked.
With reference to the injury performance of Workers who are not employees, but whose work and/or place of work is under the control of the company, in order to ensure representativeness of Open Fiber's business, the employees of companies operating within the Creation and Delivery & Assurance activities were considered.
Hours worked by Open Fiber employees are measured through the attendance tracking system. Hours worked by employees of companies involved in Creation, Delivery and Assurance are calculated starting from the FTE data communicated by the companies in the reporting period.

7.5.4.3 GRI 404 Training and Education

GRI 404-1: AVERAGE HOURS OF TRAINING PER YEAR PER EMPLOYEE – OPEN FIBER S.P.A.

NUMBER OF ANNUALLY AVERAGE HOURS OF TRAINING PER EMPLOYEE

Description		U.M.	2023	2024	2025
Training by employee category (average hours per capita)	Executives	h/employee	34	50	23
	Middle managers	h/employee	37	48	39
	Office workers	h/employee	49	45	39
Formazione per genere (ore medie pro capite)	Female	h/employee	46	44	37
	Male	h/employee	48	46	38
Average hours of training per employee		**h/employee**	**47**	**45**	**38**
Total hours of training		**h/employee**	**81,661**	**81,933**	**69,734**

Notes: between 2023 and 2024, the total number of training hours provided to employees is rather stable, while there is an increase in training hours provided to managers and executives, for whom a series of training activities aimed at developing leadership skills were launched during 2024. In 2025, the number of training hours decreased compared to the previous two years, as the leadership training course for managers and the training course on reporting on grey areas were completed.

GRI 404-1: AVERAGE HOURS OF TRAINING PER YEAR PER EMPLOYEE – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

NUMBER OF ANNUALLY AVERAGE HOURS OF TRAINING PER EMPLOYEE

Description		U.M.	2023	2024	2025
Training by employee category (average hours per capita)	Executives	h/employee	0	0	0*
	Middle managers	h/employee	0	0	12*
	Office workers	h/employee	15	12	10
	Laborers	h/employee	74	27	23
Training by gender (average hours per capita)	Female	h/employee	10	9	7
	Male	h/employee	68	24	21
Average hours of training per employee		**h/employee**	**65**	**23**	**20**
Total hours of training		**h/employee**	**23,558**	**7,842**	**8,123**

*During 2025, OFNS provided training to two executives and seven managers seconded from Open Fiber to OFNS for a total of 20 and 40 hours, respectively.
Notes: in the two-years period 2024-2025 there was a reduction in the hours of training provided compared to 2023 due to the lower number of mandatory training activities, most of which had already been carried out in the previous year.

GRI 404-1: AVERAGE HOURS OF TRAINING PER YEAR PER EMPLOYEE – CONSOLIDATED PERFORMANCE

NUMBER OF ANNUALLY AVERAGE HOURS OF TRAINING PER EMPLOYEE

Description		U.M.	2023	2024	2025
Training by employee category (average hours per capita)	Executives	h/employee	34	50	24
	Middle managers	h/employee	37	47	37
	Office workers	h/employee	48	43	37
	Laborers	h/employee	11	27	23
Training by gender (average hours per capita)	Female	h/employee	45	43	36
	Male	h/employee	52	41	34
Average hours of training per employee		**h/employee**	**50**	**42**	**35**
Total hours of training		**h/employee**	**105,219**	**89,775**	**77,857**

GRI 404-3: PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEWS – OPEN FIBER S.P.A.

PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEWS BY EMPLOYMENT CATEGORY

Employee category	U.M.	2023	2024	2025
Executives	%	100%	98%	86%
Middle managers	%	76%	67%	99%
Office workers	%	75%	68%	95%

PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEW BY GENDER

Gender	U.M.	2023	2024	2025
Female	%	69%	69%	96%
Male	%	80%	69%	95%

PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEW

Description	U.M.	2023	2024	2025
Total of employees receiving regular reviews	%	76%	69%	95%

GRI 404-3: PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEWS – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEWS BY EMPLOYMENT CATEGORY

Employee category	U.M.	2023	2024	2025
Executives	%	0%	0%	0%*
Middle managers	%	0%	0%	67%*
Office workers	%	6%	7%	66%
Laborers	%	0%	0%	0%

PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEW BY GENDER

Gender	U.M.	2023	2024	2025
Female	%	6%	5%	74%
Male	%	1%	1%	13%

PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEW

Description	U.M.	2023	2024	2025
Total of employees receiving regular reviews	%	1%	1%	17%

*During 2025, one executive who joined and left during the year underwent performance and professional development assessments. In addition, two managers (one man and one woman) and seven middle managers (five men and two women) seconded from Open Fiber to OFNS were assessed by OFNS in the same year.
Notes: in 2025, OFNS launched its first systematic cycle of employee performance evaluation, which is why the relevant percentages increased significantly compared to the previous two years.

GRI 404-3: PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEWS – CONSOLIDATED PERFORMANCE

PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEWS BY EMPLOYMENT CATEGORY

Employee category	U.M.	2023	2024	2025
Executives	%	100%	97%	87%
Middle managers	%	74%	65%	98%
Office workers	%	74%	66%	94%
Laborers	%	0%	0%	0%

PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEW BY GENDER

Gender	U.M.	2023	2024	2025
Female	%	67%	67%	95%
Male	%	62%	55%	75%

PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEW

Description	U.M.	2023	2024	2025
Total of employees receiving regular reviews	%	63%	58%	81%

7.5.4.4 GRI 405 Diversity and equal opportunity

GRI 405-1: DIVERSITY OF GOVERNANCE BODIES AND EMPLOYEES – OPEN FIBER S.P.A.

DIVERSITY OF GOVERNANCE BODIES

Board of Directors by gender and age group			U.M.	2023	2024	2025
BoD Members as of 31st December	Female	< 30 years old	%	0.0%	0.0%	0.0%
		Between 30 and 50 years old	%	14.3%	0.0%	0.0%
		> 50 years old	%	0.0%	14.3%	14.3%
		Total female	**%**	**14.3%**	**14.3%**	**14.3%**
	Male	< 30 years old	%	0.0%	0.0%	0.0%
		Between 30 and 50 years old	%	28.6%	28.6%	42.9%
		> 50 years old	%	57.1%	57.1%	42.9%
		Total male	**%**	**85.7%**	**85.7%**	**85.7%**
Membri del CdA appartenenti a categorie vulnerabili per genere			**U.M.**	**2023**	**2024**	**2025**
Members of the Board of Directors belonging to vulnerable groups by gender		Female	%	0.0%	0.0%	0,0%
		Male	%	0.0%	0.0%	0,0%
		Total	**%**	**0.0%**	**0.0%**	**0,0%**

DIVERSITY OF EMPLOYEES

Employees by employee category and gender			U.M.	2023	2024	2025
Employees with an employment contract as of 31st December	Executives	Female	%	18.6%	21.3%	21.1%
		Male	%	81.4%	78.7%	78.9%
	Middle managers	Female	%	24.6%	26.4%	24.9%
		Male	%	75.4%	73.6%	75.1%
	Office workers	Female	%	34.9%	35.1%	35.2%
		Male	%	65.1%	64.9%	64.8%
		Total Female	**%**	**33.4%**	**33.7%**	**33.6%**
		Total Male	**%**	**66.6%**	**66.3%**	**66.4%**
Employees by employee category and age group			**U.M.**	**2023**	**2024**	**2025**
Employees with an employment contract as of 31st December	Executives	< 30 years old	%	0.0%	0.0%	0.0%
		Between 30 and 50 years old	%	30.5%	29.5%	26.8%
		> 50 years old	%	69.5%	70.5%	73.2%
	Middle managers	< 30 years old	%	0.0%	0.0%	0.0%
		Between 30 and 50 years old	%	65.3%	62.1%	60.6%
		> 50 years old	%	34.7%	37.9%	39.4%
	Office workers	< 30 years old	%	16.0%	15.3%	13.7%
		Between 30 and 50 years old	%	77.4%	75.0%	75.3%
		> 50 years old	%	6.6%	9.7%	11.0%
		Total < 30 years old	**%**	**14.0%**	**13.2%**	**11.8%**
		Total Between 30 and 50 years old	**%**	**74.6%**	**72.2%**	**71.8%**
		Total > 50 years old	**%**	**11.4%**	**14.6%**	**16.4%**
Employees belonging to vulnerable groups			**U.M.**	**2023**	**2024**	**2025**
Executives			%	0.0%	0.0%	0.0%
Middle managers			%	1.8%	1.6%	**2.1%**
Office workers			%	2.5%	3.4%	**3.9%**
Total employees belonging to vulnerable groups			%	**2.4%**	**3.1%**	**3.5%**

Notes: for "Diversity of governance bodies", the percentages are calculated as the number of governance body members falling into this specific category compared to the total number of governance body members in the reporting year.
For "Diversity of employees", the percentages are calculated as the number of employees falling into this specific category compared to the total number of employees by employment contract in the reporting year.

GRI 405-1: DIVERSITY OF GOVERNANCE BODIES AND EMPLOYEES – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

DIVERSITY OF EMPLOYEES

Employees by gender and age group			U.M.	2023	2024	2025
Employees with an employment contract as of 31st December	Executives	Female	%	0.0%	0.0%	0.0%
		Male	%	0.0%	100.0%	0.0%
	Middle managers	Female	%	25.0%	40.0%	11.1%
		Male	%	75.0%	60.0%	88.9%
	Office workers	Female	%	31.4%	27.8%	26.0%
		Male	%	68.6%	72.2%	74.0%
	Laborers	Female	%	0.0%	0.0%	0.3%
		Male	%	100.0%	100.0%	99.7%
		Total Female	**%**	**4.7%**	**6.4%**	**6.6%**
		Total Male	**%**	**95.3%**	**93.6%**	**93.4%**
Employees by employee category and age group			**U.M.**	**2023**	**2024**	**2025**
Employees with an employment contract as of 31st December	Executives	< 30 years old	%	0.0%	0.0%	0.0%
		Between 30 and 50 years old	%	0.0%	0.0%	0.0%
		> 50 years old	%	0.0%	100.0%	0.0%
	Middle managers	< 30 years old	%	0.0%	0.0%	0.0%
		Between 30 and 50 years old	%	25.0%	40.0%	33.3%
		> 50 years old	%	75.0%	60.0%	66.7%
	Office workers	< 30 years old	%	29.4%	25.0%	20.8%
		Between 30 and 50 years old	%	47.1%	55.6%	62.5%
		> 50 years old	%	23.5%	19.4%	16.7%
	Laborers	< 30 years old	%	41.8%	33.3%	30.0%
		Between 30 and 50 years old	%	45.5%	50.0%	52.1%
		> 50 years old	%	12.7%	16.7%	17.9%
		Total < 30 years old	**%**	**39.6%**	**31.0%**	**27.2%**
		Total Between 30 and 50 years old	**%**	**45.4%**	**50.9%**	**54.1%**
		Total > 50 years old	**%**	**15.0%**	**18.1%**	**18.7%**
Employees belonging to vulnerable groups			**U.M.**	**2023**	**2024**	**2025**
Executives			%	0.0%	0.0%	0.0%
Middle managers			%	0.0%	0.0%	0.0%
Office workers			%	2.0%	5.6%	5.2%
Laborers			%	0.0%	0.4%	0.7%
Total employees belonging to vulnerable groups			%	**0.3%**	**1.5%**	**1.7%**

Note: all employees and workers belonging to vulnerable categories employed in the two-year period 2024-2025 fall under Article 1 of Law 68/99. For governing bodies, please refer to Open Fiber S.p.A.

GRI 405-1: DIVERSITY OF GOVERNANCE BODIES AND EMPLOYEES – CONSOLIDATED PERFORMANCE

DIVERSITY OF EMPLOYEES

Employees by gender and age group			U.M.	2023	2024	2025
Employees with an employment contract as of 31st December	Executives	Female	%	18.6%	21.0%	21.1%
		Male	%	81.4%	79.0%	78.9%
	Middle managers	Female	%	24.6%	26.7%	24.3%
		Male	%	75.4%	73.3%	75.7%
	Office workers	Female	%	34.8%	34.7%	34.7%
		Male	%	65.2%	65.3%	65.3%
	Laborers	Female	%	0.0%	0.0%	0.3%
		Male	%	100.0%	100.0%	99.7%
	Total Women		%	**28.4%**	**29.4%**	**28.6%**
	Total Men		%	**71.6%**	**70.6%**	**71.4%**
Employees by employee category and age group			**U.M.**	**2023**	**2024**	**2025**
Employees with an employment contract as of 31st December	Executives	< 30 years old	%	0.0%	0.0%	0.0%
		Between 30 and 50 years old	%	30.5%	29.0%	26.8%
		> 50 years old	%	69.5%	71.0%	73.2%
	Middle managers	< 30 years old	%	0.0%	0.0%	0.0%
		Between 30 and 50 years old	%	64.3%	61.5%	59.4%
		> 50 years old	%	35.7%	38.5%	40.6%
	Office workers	< 30 years old	%	16.5%	15.7%	14.1%
		Between 30 and 50 years old	%	76.4%	74.1%	74.5%
		> 50 years old	%	7.1%	10.2%	11.3%
	Laborers	< 30 years old	%	41.8%	33.3%	30.0%
		Between 30 and 50 years old	%	45.4%	50.0%	52.1%
		> 50 years old	%	12.7%	16.7%	17.9%
	Total < 30 years old		%	**18.4%**	**16.0%**	**14.6%**
	Total Between 30 and 50 years old		%	**69.6%**	**68.8%**	**68.6%**
	Total > 50 years old		%	**12.0%**	**15.2%**	**16.8%**
Employees belonging to vulnerable groups			**U.M.**	**2023**	**2024**	**2025**
Executives			%	0.0%	0.0%	0.0%
Middle managers			%	1.8%	1.6%	2.0%
Office workers			%	2.5%	3.5%	4.0%
Laborers			%	0.0%	0.4%	0.7%
Total employees belonging to vulnerable groups			%	**2.0%**	**2.8%**	**3.1%**

7.5 CLIMATE CHANGE

7.5.1 GRI 302 Energy

GRI 302-1: ENERGY CONSUMPTION WITHIN THE ORGANISATION – OPEN FIBER S.P.A.

ENERGY CONSUMPTION WITHIN THE ORGANISATION

Energy consumption	U.M.	2023	2024	2025
Electricity from non-renewable sources	GJ	4,096.5	6,745.7	4,324.2
Electricity from renewable sources	GJ	151,075.8	185,802.4	222,177.4
Energy from natural gas consumption	GJ	1,094.3	1,837.6	1,783.0
Energy from diesel consumption (transport)	GJ	3,899.2	1,467.4	1,629.9
Energy from petrol consumption (transport)	GJ	14,095.6	15,498.7	17,159.1
Energy from petrol LPG (transport)	GJ	-	-	1.8
Total energy consumption	**GJ**	**174,261.4**	**211,351.8**	**247,075.4**

Notes: electricity and gas consumption data were obtained from the invoices issued by the respective energy suppliers or from readings at the metering points where present, with the exception of condominium consumption for sites where Open Fiber is not the holder of a POD/PDR and for which electricity and natural gas consumption was estimated on the basis of thousandths or on the basis of the contractual flat rate for charges and accessories.
The consumption of diesel, petrol, LPG and electricity for transport was determined through the fuel card balances of the vehicles.
In the consumption analysis, those connected to the coworking sites, where Open Fiber has no control over energy, were not considered. With reference to energy from renewable sources, as of 2022 all electricity purchased by Open Fiber is subject to GdO (Guarantee of Origin), with the exception of a minimum share (equal to about 0.012% of consumption) relating to some sites for which the supply is provided by local distributors.

GRI 302-1: ENERGY CONSUMPTION WITHIN THE ORGANISATION – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

ENERGY CONSUMPTION WITHIN THE ORGANISATION

Energy consumption	U.M.	2023	2024	2025
Electricity from non-renewable sources	GJ	50.2	68.6	150.9
Electricity from renewable sources	GJ	41.1	63.4	32.4
Energy from biofuel consumption (transport)	GJ	0.0	17.2	44.3
Energy from natural gas consumption	GJ	15.6	0.0	22.2
Energy from LPG consumption (transport)	GJ	0.0	41.2	16.7
Energy from diesel consumption (transport)	GJ	34,046.8	37,362.6	43,299.1
Energy from petrol consumption (transport)	GJ	2,893.8	3,089.4	4,227.8
Total energy consumption	**GJ**	**37,047.6**	**40,642.4**	**47,793.4**

Notes: electricity and gas consumption data were taken from the invoices issued by the respective energy suppliers, with the exception of consumption at locations where OFNS is not the holder of a POD/PDR and for which electricity and natural gas consumption was estimated on the basis of the contractual flat-rate fee for charges and accessories. Diesel, petrol, biofuel and LPG consumption for motor vehicles were determined through the fuel card records of the vehicles.

GRI 302-1: ENERGY CONSUMPTION WITHIN THE ORGANISATION – CONSOLIDATED PERFORMANCE

ENERGY CONSUMPTION WITHIN THE ORGANISATION

Energy consumption	U.M.	2023	2024	2025
Electricity from non-renewable sources	GJ	4,146.7	6,814.3	4,475.1
Electricity from renewable sources	GJ	151,116.9	185,865.8	222,209.8
Energy from biofuel consumption (transport)	GJ	0.0	17.2	44.3
Energy from natural gas consumption	GJ	1,109.9	1,837.6	1,805.2
Energy from LPG consumption (transport)	GJ	0.0	41.2	18.5
Energy from diesel consumption (transport)	GJ	37,946.1	38,830.1	44,929.0
Energy from petrol consumption (transport)	GJ	16,989.4	18,588.1	21,386.9
Total energy consumption	**GJ**	**211,309.0**	**251,994.2**	**294,868.8**

Standards, methodologies, and conversion factors
In order to calculate the quantity of energy with reference to the consumption of natural gas, LPG, diesel and petrol, the conversion coefficients set out by ENEA in the guidelines and operational instructions for energy audits pursuant to Article 8 of Legislative Decree 102/14 have been applied. The share of electricity from renewable sources is calculated on the basis of the consumption of PODs to which Guarantees of Origin were associated by the electricity supplier in the three-year period 2023-2025.

GRI 302-3: ENERGY INTENSITY – OPEN FIBER S.P.A.

ENERGY INTENSITY

Description	U.M.	2023	2024	2025
Total energy consumed	GJ	174,261.4	211,351.8	247,075.4
Energy intensity	**MJ/HP**	**10.2**	**11.3**	**12.2**

Notes: the energy included in the calculation of energy intensity includes the energy consumption within the organisation (302-1), relating to electricity consumption, natural gas consumption and diesel, LPG and petrol consumption connected to the company car fleet. The number of households passed at 31/12 of the reference year is the organisation-specific parameter for calculating intensity.

GRI 302-3: ENERGY INTENSITY – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

ENERGY INTENSITY

Description	U.M.	2023	2024	2025
Total energy consumed	GJ	37,047.6	40,642.4	47,793.4
Energy intensity	**MJ/€**	**0.8**	**0.8**	**0.4**

Notes: the energy included in the calculation of energy intensity includes the energy consumed within the organisation (302-1), relating to electricity consumption, natural gas consumption, LPG consumption and diesel consumption, and petrol and biofuel consumption for motor vehicles. Revenues of the reference year are the specific parameter of the organisation to calculate the intensity.

GRI 302-3: ENERGY INTENSITY – CONSOLIDATED PERFORMANCE

ENERGY INTENSITY

Description	U.M.	2023	2024	2025
Total energy consumed	GJ	211,309.0	251,994.2	294,868.8
Energy intensity	**MJ/€**	**0.4**	**0.4**	**0.4**

Notes: the energy included in the calculation of energy intensity includes energy consumption within the organisation (302-1), relating to electricity consumption, natural gas consumption, LPG consumption, diesel consumption and petrol and biofuel consumption for motor vehicles. Revenues for the reference year are the organisation's specific parameter for calculating the intensity.

7.5.2 GRI 305 Emissions

GRI 305-1: DIRECT (SCOPE 1) GHG EMISSIONS – OPEN FIBER S.P.A.

DIRECT (SCOPE 1) GHG EMISSIONS

Description	U.M.	2023	2024	2025
Scope 1 emissions from fossil fuels	tCO_2eq	1,256.0	1,238.5	1,327.7
Scope 1 emissions from refrigerant gases	tCO_2eq	76.7	620.9	598.1
Total Scope 1 emissions	**tCO_2eq**	**1,332.7**	**1,859.4**	**1,925.8**
Description	**U.M.**	**2023**	**2024**	**2025**
Scope 1 biogenic emissions	tCO_2eq	102	90.0	107.9

Notes: the GHGs considered in the calculation are: CO_2, CH_4, N_2O and HFC-n due to leaks from air conditioning systems at technology sites. The data for 2024 were updated following verification of compliance with the requirements of ISO 14064-1 of Open Fiber S.p.A.'s GHG inventory.

GRI 305-1: DIRECT (SCOPE 1) GHG EMISSIONS – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

DIRECT (SCOPE 1) GHG EMISSIONS

Description	U.M.	2023	2024	2025
Scope 1 emissions from fossil fuels	tCO_2eq	2,447.6	2,687.4	3,125.0
Scope 1 emissions from refrigerant gases	tCO_2eq	0,0	0.0	0.0
Total Scope 1 emissions	**tCO_2eq**	**2,447.6**	**2,687.4**	**3,125.0**
Description	**U.M.**	**2023**	**2024**	**2025**
Scope 1 biogenic emissions	tCO_2eq	264.0	284.9	362.9

Notes: the GHGs considered in the calculation are: CO_2, CH_4, N_2O. The data for 2024 were updated following verification of compliance with the requirements of ISO 14064-1 of Open Fiber S.p.A.'s GHG inventory.

GRI 305-1: DIRECT (SCOPE 1) GHG EMISSIONS – CONSOLIDATED PERFORMANCE

DIRECT (SCOPE 1) GHG EMISSIONS

Description	U.M.	2023	2024	2025
Scope 1 emissions from fossil fuels	tCO_2eq	3.703.6	3,925.9	4,452.7
Scope 1 emissions from refrigerant gases	tCO_2eq	76.7	620.9	598.1
Total Scope 1 emissions	**tCO_2eq**	**3,780.3**	**4,546.8**	**5,050.8**
Description	**U.M.**	**2023**	**2024**	**2025**
Scope 1 biogenic emissions	tCO_2eq	366.0	374.8	470.8

Notes: the GHGs considered in the calculation are: CO_2, CH_4, N_2OO and the HFC-n coming from leaks from air conditioning systems at technology sites. The data for 2024 were updated following verification of compliance with the requirements of ISO 14064-1 of Open Fiber S.p.A.'s GHG inventory.

Standards, methodologies, and conversion factors
For the classification and calculation methodology of emissions, Open Fiber refers to "The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)", as well as ISO 14064-1. Included in Scope 1 emissions (direct emissions from sources that are owned or otherwise under the control of the organisation) are those resulting mainly from combustion inside plants, boilers and company vehicles, as well as from gas leaks from air conditioning systems. The main databases consulted for the identification of emission factors used in the calculation of Scope 1 emissions for the year 2025 are: Ecoinvent 3.12 and UK Government GHG Conversion Factors for Company Reporting, Version 1.1 Year 2025. For the calculation of emissions related to refrigerant gas leaks from air conditioning systems, the GWP (Global Warming Potential) values associated with each circuit gas published by Intergovernmental Panel on Climate Change - IPCC Fifth Assessment Report, 2021 (AR6) were used.

GRI 305-2: INDIRECT GHG EMISSIONS FROM ENERGY CONSUMPTION (SCOPE 2) – OPEN FIBER S.P.A.

INDIRECT (SCOPE 2) GHG EMISSIONS FROM ENERGY CONSUMPTION

Description	U.M.	2023	2024	2025
Scope 2 emissions – Location-based	tCO_2eq	10,390.1	12,257.7	14,867.3
Description	**U.M.**	**2023**	**2024**	**2025**
Scope 2 emissions – Market-based	tCO_2eq	518.4	899.0	406.3

Notes: The GHGs considered in the calculation are: CO_2, CH_4 and N_2O. The data for 2024 were updated following verification of compliance with the requirements of ISO 14064-1 of Open Fiber S.p.A.'s GHG inventory.

GRI 305-2: INDIRECT GHG EMISSIONS FROM ENERGY CONSUMPTION (SCOPE 2) – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

INDIRECT (SCOPE 2) GHG EMISSIONS FROM ENERGY CONSUMPTION

Description	U.M.	2023	2024	2025
Scope 2 emissions – Location-based	tCO_2eq	6.1	8.4	12.0
Description	**U.M.**	**2023**	**2024**	**2025**
Scope 2 emissions – Market-based	tCO_2eq	3.9	9.1	14.2

Notes: the GHGs considered in the calculation are: CO_2, CH_4, N_2O. The data for 2024 were updated following verification of compliance with the requirements of ISO 14064-1 of Open Fiber S.p.A.'s GHG inventory.

GRI 305-2: INDIRECT GHG EMISSIONS FROM ENERGY CONSUMPTION (SCOPE 2) – CONSOLIDATED PERFORMANCE

INDIRECT (SCOPE 2) GHG EMISSIONS FROM ENERGY CONSUMPTION

Description	U.M.	2023	2024	2025
Scope 2 emissions – Location-based	tCO_2eq	10,396.2	12,266.1	14,879.3
Description	**U.M.**	**2023**	**2024**	**2025**
Scope 2 emissions – Market-based	tCO_2eq	522.3	908.2	420.5

Notes: the GHGs considered in the calculation are: CO_2, CH_4, N_2O. The data for 2024 were updated following verification of compliance with the requirements of ISO 14064-1 of Open Fiber S.p.A.'s GHG inventory.

Standards, methodologies, and conversion factors
For emissions classification and calculation methodology Open Fiber refers to "The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)", as well as ISO 14064-1. Included in Scope 2 emissions (indirect greenhouse gas emissions) are emissions from the generation of electricity, heat or steam purchased and used by the organisation.
The main database consulted for the identification of emission factors used in the calculation of Scope 2 emissions for the year 2025 is ISPRA "Historical series of national emission factors (1990-2023) for electricity production and consumption" (for the location-based approach) and Ecoinvent 3.12 (for the market-based approaches).

GRI 305-3: OTHER INDIRECT GHG EMISSIONS (SCOPE 3) – OPEN FIBER S.P.A.

OTHER INDIRECT GHG EMISSIONS (SCOPE 3)

Description	U.M.	2023	2024	2025
Scope 3 emissions – Location-based	tCO_2eq	405,175.6	303.385,6	346.545,8
Description	**U.M.**	**2023**	**2024**	**2025**
Scope 3 emissions – Market-based	tCO_2eq	402,684.8	301.822,8	342.736,9
Description	**U.M.**	**2023**	**2024**	**2025**
Scope 3 biogenic emissions	tCO_2eq	31.0	0.0	0.0

Notes: the GHGs considered in the calculation are: CO_2, CH_4 and N_2O. The Scope 3 emissions of Open Fiber S.p.A. also include the emissions of Open Fiber Network Solutions S.c.a.r.l. The data relating to 2024 have been updated following a verification of compliance with the requirements of ISO 14064-1 of the GHG inventory of Open Fiber S.p.A.

GRI 305-3: OTHER INDIRECT GHG EMISSIONS (SCOPE 3) – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

OTHER INDIRECT GHG EMISSIONS (SCOPE 3)

Description	U.M.	2023	2024	2025
Scope 3 emissions – Location-based	tCO_2eq	-	9,043.8	15,699.1
Description	**U.M.**	**2023**	**2024**	**2025**
Scope 3 emissions – Market-based	tCO_2eq	-	9,044.1	15,696.4
Description	**U.M.**	**2023**	**2024**	**2025**
Scope 3 biogenic emissions	tCO_2eq	-	0.0	0.0

Notes: the greenhouse gases considered in the calculation are: CO_2, CH_4 and N_2O. The data for 2024 have been updated following verification of compliance with the requirements of ISO 14064-1 of the GHG inventory of Open Fiber S.p.A.

GRI 305-3: OTHER INDIRECT GHG EMISSIONS (SCOPE 3) – CONSOLIDATED PERFORMANCE

OTHER INDIRECT GHG EMISSIONS (SCOPE 3)

Description	U.M.	2023	2024	2025
Scope 3 emissions – Location-based	tCO_2eq	402,721.9	309,733.6	359,107.8
Description	**U.M.**	**2023**		
Scope 3 emissions – Market-based	tCO_2eq	400,233.3	308,170.3	355,294.1
Description	**U.M.**	**2023**	**2024**	**2025**
Scope 3 biogenic emissions	tCO_2eq	31.0	0.0	0.0

Notes: the GHGs considered in the calculation are: CO_2, CH_4 and N_2. For consolidation purposes, Open Fiber Network Solutions S.c.a.r.l.'s Scope 1 and 2 emissions are subtracted from Open Fiber S.p.A.'s Scope 3 emissions in order to avoid double counting. Open Fiber S.p.A.'s Scope 3 emissions also include the emissions of Open Fiber Network Solutions S.c.a.r.l., given that the Consortium's activities are carried out on behalf of Open Fiber S.p.A. as work contracts; The data for 2024 have been updated following verification of compliance with the requirements of ISO 14064-1 of the GHG inventory of Open Fiber S.p.A.

Standards, methodologies, and conversion factors
For emissions classification and calculation methodology Open Fiber refers to "The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)", as well as ISO 14064-1. Included in Scope 3 emissions (other indirect greenhouse gas emissions) are emissions included in the categories *Purchased goods and services, Capital goods, Fuel- and Energy-Related Activities, Upstream Transportation and Distribution, Waste Generated in Operations, Business Travel, Employee Commuting / Smart working, Downstream leased assets*. The main databases consulted for the identification of emission factors used in the calculation of emissions related to the value chain for the year 2025 are: Ecoinvent 3.12, CEDA 2025 and UK Government GHG Conversion Factors for Company Reporting, Version 1.1 Year 2025.

GRI 305-4: GHG EMISSIONS INTENSITY – OPEN FIBER S.P.A.

GHG EMISSIONS (LOCATION-BASED)

Description	U.M.	2023	2024	2025
GHG emissions intensity (Scope 1 + Scope 2 Location-based)	$kgCO_2eq/HP$	0.69	0.75	0.83
GHG emissions intensity (Scope 1 + Scope 2 + Scope 3 Location-based)	$kgCO_2eq/HP$	24.38	16.98	17.99

GHG EMISSIONS (MARKET-BASED)

Description	U.M.	2023	2024	2025
GHG emissions intensity (Scope 1 + Scope 2 Market-based)	$kgCO_2eq/HP$	0.11	0.15	0.12
GHG emissions intensity (Scope 1 + Scope 2 + Scope 3 Market-based)	$kgCO_2eq/HP$	23.66	16.29	17.08

Notes: the emissions included in the calculation are Scope 1, Scope 2 and Scope 3. The GHGs included in the calculation are the same as those included in GRI 305-1, GRI 305-2 and GRI 305-3. The number of households passed at 31/12 of the reference year is the organisation-specific parameter for calculating intensity. The data for 2024 were updated following verification of compliance with the requirements of ISO 14064-1 of Open Fiber S.p.A's GHG inventory.

GRI 305-4: GHG EMISSIONS INTENSITY – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

GHG EMISSIONS (LOCATION-BASED)

Description	U.M.	2023	2024	2025
GHG emissions intensity (Scope 1 + Scope 2 Location-based)	$gCO_2eq/€$	50.50	55.79	24.48
GHG emission intensity (Scope 1 + Scope 2 + Scope 3 Location-based)	$gCO_2eq/€$	-	242.97	147.01

GHG EMISSIONS (MARKET-BASED)

Description	U.M.	2023	2024	2025
GHG emissions intensity (Scope 1 + Scope 2 Market-based)	$gCO_2eq/€$	50.40	55.81	24.50
GHG emissions intensity (Scope 1 + Scope 2 + Scope 3 Market-based)	$gCO_2eq/€$	-	242.99	147.00

Notes: the emissions included in the calculation are the Scope 1, and Scope 2 and Scope 3 emissions. The GHGs included in the calculation are the same as those included within the Scope 1 and Scope 2 emissions in GRI 305-1, and GRI 305-2 and GRI 305-3. Revenues of the reference year are the organisation's specific parameter for calculating intensity. The data for 2024 were updated following verification of compliance with the requirements of ISO 14064-1 of Open Fiber S.p.A's GHG inventory.

GRI 305-4: GHG EMISSIONS INTENSITY – CONSOLIDATED PERFORMANCE

GHG EMISSIONS (LOCATION-BASED)

Description	U.M.	2023	2024	2025
GHG emissions intensity (Scope 1 + Scope 2 Location-based)	$gCO_2eq/€$	24.30	26.25	27.38
GHG emission intensity (Scope 1 + Scope 2 + Scope 3 Location-based)	716.00	716.00	509.90	520.77

GHG EMISSIONS (MARKET-BASED)

Description	U.M.	2023	2024	2025
GHG emissions intensity (Scope 1 + Scope 2 Market-based)	$gCO_2eq/€$	7.40	8.52	7.52
GHG emissions intensity (Scope 1 + Scope 2 + Scope 3 Market-based)	$gCO_2eq/€$	694.70	489.72	495.66

Notes: emissions included in the calculation are Scope 1 emissions, Scope 2 and Scope 3 emissions. The GHGs included in the calculation are the same as those included within Scope 1 and Scope 2 emissions in GRI 305-1, GRI 305-2 and GRI 305-3. Revenues of the reference year are the organisation's specific parameter for calculating intensity. The data for 2024 were updated following verification of compliance with the requirements of ISO 14064-1 of Open Fiber S.p.A's GHG inventory.

7.5.6 CIRCULAR ECONOMY

7.5.6.1 GRI 306 Waste

GRI 306-3: WASTE GENERATED – OPEN FIBER S.P.A.

WASTE GENERATED

Description	U.M.	2023		2024		2025	
		NOT intended for disposal	DIRECTED to disposal	NOT intended for disposal	DIRECTED to disposal	NOT intended for disposal	DIRECTED to disposal
Total waste	**t**	**208.68**	**0.00**	**463.76**	**0.00**	**161.21**	**1.66**
Hazardous waste	t	1.62	0.00	0.00	0.00	0.00	1.40
Non hazardous waste	t	207.06	0.00	463.76	0.00	161.21	0.26

Notes: the special waste produced comes from the management of obsolete material in the warehouses. This table does not include the quantities of waste assimilable to urban waste produced in offices and delivered to the public waste collection service. The increase in waste generated during 2024 compared to 2023 is linked to the disposal of damaged cement.

GRI 306-3: WASTE GENERATED – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.

WASTE GENERATED

Description	U.M.	2023		2024		2025	
		NOT intended for disposal	DIRECTED to disposal	NOT intended for disposal	DIRECTED to disposal	NOT intended for disposal	DIRECTED to disposal
Total waste	**t**	**28,110.97**	**0.00**	**17,075.10**	**7,061.65**	**15,791.38**	**940.91**
Hazardous waste	t	0.00	0.00	0,00	0.00	0.00	0.00
Non hazardous waste	t	28,110.97	0.00	17,075.10	7,061.65	15,791.38	940.91

Notes: the special waste produced derives largely from the waste materials produced during excavation for the laying of cables. This table does not include the quantities of waste assimilable to urban waste produced in offices and delivered to the public waste collection service.

GRI 306-3: WASTE GENERATED – CONSOLIDATED PERFORMANCE

WASTE GENERATED

Description	U.M.	2023		2024		2025	
		NOT intended for disposal	DIRECTED to disposal	NOT intended for disposal	DIRECTED to disposal	NOT intended for disposal	DIRECTED to disposal
Total waste	**t**	**28,319.65**	**0.00**	**17,538.86**	**7,061.65**	**15,952.59**	**942.57**
Hazardous waste	t	1.62	0.00	0.00	0.00	0.00	1.40
Non hazardous waste	t	28,318.03	0.00	17,538.86	7,061.65	15,952.59	941.17

Notes: this table does not include the amounts of waste assimilable to urban waste produced in offices and delivered to the public waste collection service.

GRI 306-4: WASTE DIVERTED FROM DISPOSAL – OPEN FIBER S.P.A.

WASTE DIVERTED FROM DISPOSAL

Description	U.M.	2023	2024	2025
Total hazardous waste	**t**	**1.62**	**0.00**	**0.00**
- of which preparation for re-use	t	0.00	0.00	0.00
- of which recycled	t	0.00	0.00	0.00
- of which in addition to recovery operations	t	1.62	0.00	0.00
Total non-hazardous waste	**t**	**207.06**	**463.76**	**161.21**
- of which preparation for re-use	t	0.00	0.00	0.00
- of which recycled	t	0.00	0.00	0.00
- of which to other recovery operations	t	207.06	463.76	161.21

Notes: the recovery of all waste produced by Open Fiber is entrusted to authorised third parties in accordance with current regulations and is carried out at sites outside the company. Waste produced in 2024 increased compared to 2023 due to the disposal of damaged cement.

GRI 306-4: WASTE DIVERTED FROM DISPOSAL – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

WASTE DIVERTED FROM DISPOSAL

Description	U.M.	2023	2024	2025
Total hazardous waste	**t**	**0.00**	**0.00**	**0.00**
- of which preparation for re-use	t	0.00	0.00	0.00
- of which recycled	t	0.00	0.00	0.00
- of which in addition to recovery operations	t	0.00	0.00	0.00
Total non-hazardous waste	**t**	**28,110.97**	**17,075.10**	**15,791.38**
- of which preparation for re-use	t	0.00	0.00	0.00
- of which recycled	t	28,110.97	0.00	0.00
- of which to other recovery operations	t	0.00	17,075.10	15,791.38

Notes: the recovery of all waste produced by Open Fiber is entrusted to authorised third parties in accordance with current regulations and is carried out at sites outside the company.

GRI 306-4: WASTE DIVERTED FROM DISPOSAL – CONSOLIDATED PERFORMANCE

WASTE DIVERTED FROM DISPOSAL

Description	U.M.	2023	2024	2025
Total hazardous waste	**t**	**1.62**	**0.00**	**0.00**
- of which preparation for re-use	t	0.00	0.00	0.00
- of which recycled	t	0.00	0.00	0.00
- of which in addition to recovery operations	t	0.00	0.00	0.00
Total non-hazardous waste	**t**	**28,318.03**	**17,538.86**	**15,952.59**
- of which preparation for re-use	t	0.00	0.00	0.00
- of which recycled	t	28,110.97	0.00	0.00
- of which to other recovery operations	t	207.06	17,538.86	15,952.59

Notes: the recovery of all waste produced by Open Fiber is entrusted to authorised third parties in accordance with current regulations and is carried out at sites outside the company.

GRI 306-5: WASTE DIRECTED TO DISPOSAL – OPEN FIBER S.P.A.

WASTE DIRECTED TO DISPOSAL

Description	U.M.	2023	2024	2025
Total hazardous waste	**t**	**0.00**	**0.00**	**1.40**
- incineration (with energy recovery)	t	0.00	0.00	0.00
- incineration (without energy recovery)	t	0.00	0.00	0.00
- landfilling	t	0.00	0.00	1.40
- other disposal operations	t	0.00	0.00	0.00
Total non-hazardous waste	**t**	**0.00**	**0.00**	**0.26**
- incineration (with energy recovery)	t	0.00	0.00	0.00
- incineration (without energy recovery)	t	0.00	0.00	0.00
- landfilling	t	0.00	0.00	0.26
- other disposal operations	t	0.00	0.00	0.00

GRI 306-5: WASTE DIRECTED TO DISPOSAL – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

WASTE DIRECTED TO DISPOSAL

Description	U.M.	2023	2024	2025
Total hazardous waste	**t**	**0.00**	**0.00**	**0.00**
- incineration (with energy recovery)	t	0.00	0.00	0.00
- incineration (without energy recovery)	t	0.00	0.00	0.00
- landfilling	t	0.00	0.00	0.00
- other disposal operations	t	0.00	0.00	0.00
Total non-hazardous waste	**t**	**0.00**	**7,061.65**	**940.91**
- incineration (with energy recovery)	t	0.00	0.00	0.00
- incineration (without energy recovery)	t	0.00	0.00	0.00
- landfilling	t	0.00	7,061.65	940.91
- other disposal operations	t	0.00	0.00	0.00

GRI 306-5: WASTE DIRECTED TO DISPOSAL – CONSOLIDATED PERFORMANCE

WASTE DIRECTED TO DISPOSAL

Description	U.M.	2023	2024	2025
Total hazardous waste	**t**	**0.00**	**0.00**	**1.40**
- incineration (with energy recovery)	t	0.00	0.00	0.00
- incineration (without energy recovery)	t	0.00	0.00	0.00
- landfilling	t	0.00	0.00	1.40
- other disposal operations	t	0.00	0.00	0.00
Total non-hazardous waste	**t**	**0.00**	**7,061.65**	**941.17**
- incineration (with energy recovery)	t	0.00	0.00	0.00
- incineration (without energy recovery)	t	0.00	0.00	0.00
- landfilling	t	0.00	7,061.65	941.17
- other disposal operations	t	0.00	0.00	0.00

7.5.7 RESPONSIBLE VALUE CHAIN MANAGEMENT

GRI 308 Supplier environmental assessment

GRI 308-1: NEW SUPPLIERS THAT WERE SCREENED USING ENVIRONMENTAL CRITERIA – OPEN FIBER S.P.A.

NEW SUPPLIERS SELECTED USING ENVIRONMENTAL CRITERIA

Description	U.M.	2023	2024	2025
Total number of new suppliers	no.	71	152	123
New suppliers selected using environmental criteria	no.	7	13	20
New suppliers selected using environmental criteria	**%**	**10%**	**9%**	**16%**

Notes: included in new suppliers assessed according to environmental criteria are all suppliers that were newly accredited during the reporting year and suppliers that renewed their qualification and were thus re-assessed. Included in the environmental assessment criteria are the possession of specific certifications (e.g. ISO 14001 certification) and/or the possession of specific authorisations/ qualifications (e.g. National Register of Environmental Operators).
The absolute number of suppliers in 2025 is slightly lower than in 2024, as there were fewer qualification renewals, unlike in 2024 compared to 2023. Although the number of new suppliers is down compared to 2024, the percentage of new suppliers selected using environmental criteria in 2025 is up compared to the previous two years following the introduction, starting in 2024, of environmental requirements for suppliers relating to the C&D Works qualification group, in addition to the Works and Supplies cluster A&B.

GRI 308-1: NEW SUPPLIERS THAT WERE SCREENED USING ENVIRONMENTAL CRITERIA – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

NEW SUPPLIERS SELECTED USING ENVIRONMENTAL CRITERIA

Description	U.M.	2023	2024	2025
Total number of new suppliers	no.	-	342	389
New suppliers selected using environmental criteria	no.	-	0	0
New suppliers selected using environmental criteria	**%**	**-**	**0%**	**0%**

Notes: with reference to 2023, the entire purchasing process and therefore the qualification of new suppliers of Open Fiber Network Solutions was managed by another consortium company (Amplia) as foreseen in the service contract between Amplia and OFNS, in line with what was established in the Memorandum of Understanding between the parties and the Consortium statute.

GRI 308-2: NEGATIVE ENVIRONMENTAL IMPACTS IN THE SUPPLY CHAIN AND ACTIONS TAKEN – OPEN FIBER S.P.A.

NEGATIVE ENVIRONMENTAL IMPACTS IN THE SUPPLY CHAIN AND ADOPTED MEASURES

Description	U.M.	2023	2024	2025
Suppliers assessed for environmental impacts*	no.	52	54	48
Suppliers identified as having significant actual and potential negative environmental impacts.	no.	52	54	48
Suppliers identified as having significant actual and potential negative environmental impacts, with which improvements were agreed upon as a result of assessment**	no.	25	28	25
Suppliers identified as having significant actual and potential negative environmental impacts, with which improvements were agreed upon as a result of assessment	**%**	**48%**	**52%**	**52%**
Suppliers identified as having significant actual and potential negative environmental impacts, with whom relationships have been terminated as a result of the screening	no.	0	0	0
Suppliers identified as having significant actual and potential negative environmental impacts, with which relationships were terminated as a result of assessment	**%**	**0%**	**0%**	**0%**

Notes: both actual and potential negative environmental impacts were considered in the significant negative environmental impacts. As part of its environmental management system, Open Fiber has identified and assessed the aspects and related environmental impacts associated with its activities, including those carried out through the involvement of third-party companies supplying goods/products, services or works. The identification and assessment process is aimed at identifying those aspects that are considered significant with respect to business processes and therefore need to be addressed by the QHSE Management System and within the contracts signed between the parties. Depending on the conditions in which the impact occurs (normal, abnormal, and emergency), the main significant environmental aspects associated with the activities entrusted to third parties are: use of raw materials, waste production, atmospheric emissions, noise emissions and traffic. The environmental impacts that can be monitored are to date limited to those activities that are conducted under the direct control of Open Fiber.
* Suppliers, assigned contracts by Open Fiber, assessed during contract execution in the areas of quality, environment and safety were considered.
** Suppliers considered are those for which non-conformities/incidents are recorded on Open Fiber sites and on which improvement actions have been taken.

GRI 308-2: NEGATIVE ENVIRONMENTAL IMPACTS IN THE SUPPLY CHAIN AND ACTIONS TAKEN – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

NEGATIVE ENVIRONMENTAL IMPACTS IN THE SUPPLY CHAIN AND ADOPTED MEASURES

Description	U.M.	2023	2024	2025
Suppliers assessed for environmental impacts*	no.	-	12	12
Suppliers identified as having significant actual and potential negative environmental impacts.	no.	-	0	0
Suppliers identified as having significant actual and potential negative environmental impacts, with which improvements were agreed upon as a result of assessment**	no.	-	0	0
Suppliers identified as having significant actual and potential negative environmental impacts, with which improvements were agreed upon as a result of assessment	**%**	**-**	**0%**	**0%**
Suppliers identified as having significant actual and potential negative environmental impacts, with whom relationships have been terminated as a result of the screening	no.	-	0	0
Suppliers identified as having significant actual and potential negative environmental impacts, with which relationships were terminated as a result of assessment	**%**	**-**	**0%**	**0%**

Notes: with reference to 2023, the entire purchasing process and therefore the qualification of new suppliers of Open Fiber Network Solutions was managed by another consortium company (Amplia) as foreseen in the service contract between Amplia and OFNS, in line with what was established in the Memorandum of Understanding between the parties and the Consortium statute.

7.5.7.2 GRI 414 Supplier social assessment

GRI 414-1: NEW SUPPLIERS THAT WERE SCREENED USING SOCIAL CRITERIA – OPEN FIBER S.P.A.

NEW SUPPLIERS SELECTED USING SOCIAL CRITERIA

Description	U.M.	2023	2024	2025
Total number of new suppliers	no.	71	152	123
New suppliers selected using social criteria	no.	59	115	76
New suppliers selected using social criteria	**%**	**83%**	**76%**	**62%**

Notes: all suppliers that were newly accredited in the reporting year and suppliers that renewed their qualification and were then re-evaluated are included in the new suppliers that were screened using social criteria.
The social evaluation criteria include the possession of specific certifications (for example ISO 45001, SA8000, ISO 9001), the frequency and severity index of accidents and the number of HSE trained employees.
With reference to 2025 compared to 2024, the absolute number of suppliers has decreased due to a lower number of qualification renewals. Similarly, there has been a reduction in the percentage of new suppliers selected using social criteria, as there were fewer renewals of specific qualifications for the types of suppliers selected according to social criteria during the year.

GRI 414-1: NEW SUPPLIERS THAT WERE SCREENED USING SOCIAL CRITERIA – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

NEW SUPPLIERS SELECTED USING SOCIAL CRITERIA

Description	U.M.	2023	2024	2025
Total number of new suppliers	no.	-	342	389
New suppliers selected using social criteria	no.	-	0	0
New suppliers selected using social criteria	**%**	**-**	**0%**	**0%**

Notes: with reference to 2023, the entire purchasing process and therefore the qualification of new suppliers of Open Fiber Network Solutions was managed by another consortium company (Amplia) as foreseen in the service contract between Amplia and OFNS, in line with what was established in the Memorandum of Understanding between the parties and the Consortium statute.

GRI 414-2: NEGATIVE SOCIAL IMPACTS IN THE SUPPLY CHAIN AND ACTIONS TAKEN – OPEN FIBER S.P.A.

NEGATIVE SOCIAL IMPACTS IN THE SUPPLY CHAIN AND ACTIONS TAKEN

Description	U.M.	2023	2024	2025
Suppliers assessed for social impacts*	no.	66	62	53
Suppliers identified as having significant actual and potential negative social impacts	no.	66	62	53
Suppliers identified as having significant actual and potential negative social impacts, with which improvements were agreed upon as a result of assessment	no.	44	40	30
Suppliers identified as having significant actual and potential negative social impacts, with which improvements were agreed upon as a result of assessment	**%**	**67%**	**65%**	**57%**
Suppliers identified as having significant actual and potential negative social impacts, with which relationships were terminated as a result of assessment**	no.	7	0	3
Suppliers identified as having significant actual and potential negative social impacts, with which relationships were terminated as a result of assessment	**%**	**11%**	**0%**	**6%**

Notes: as part of its risk and opportunity assessment process, Open Fiber has identified actual and potential negative social impacts. These are mainly related to issues linked to Occupational Health and Safety, negative impacts on citizenship (in terms of traffic, interruption of the provision of public utilities due to damage, injuries due to inappropriate management of construction sites) and labour practices (e.g., related to the contribution regularity of companies). The improvement actions, in fact, have been agreed upon mainly as a result of accidents involving citizens, damage to underground utilities, and contribution irregularities.
* Suppliers, assigned contracts by Open Fiber, assessed during contract execution in the areas of quality, environment and safety were considered. In addition, account was taken of suppliers for whom irregular DURCs were detected during the reference year (irregularities with INPS [Italian National Institute for Social Security], INAIL [Italian National Institute for Insurance against Accidents at Work]).
** During the year 2023, seven firms (6 single firms and one consortium member) were excluded from the access mechanism/supplier register due to contribution irregularities that have not been remedied. During 2024, however, there were no exclusions from the supplier access/register mechanism as the suppliers regularised their position. Finally, during 2025, three companies were excluded from the access mechanism/supplier register due to contribution irregularities that were not remedied within the specified time frame.

GRI 414-2: NEGATIVE SOCIAL IMPACTS IN THE SUPPLY CHAIN AND ACTIONS TAKEN – OPEN FIBER NETWORK SOLUTIONS S.C.A.R.L.

NEGATIVE SOCIAL IMPACTS IN THE SUPPLY CHAIN AND ACTIONS TAKEN

Description	U.M.	2023	2024	2025
Suppliers assessed for social impacts*	no.	-	0	0
Suppliers identified as having significant actual and potential negative social impacts	no.	-	0	0
Suppliers identified as having significant actual and potential negative social impacts, with which improvements were agreed upon as a result of assessment	no.	-	0	0
Suppliers identified as having significant actual and potential negative social impacts, with which improvements were agreed upon as a result of assessment	**%**	**-**	**0%**	**0%**
Suppliers identified as having significant actual and potential negative social impacts, with which relationships were terminated as a result of assessment**	no.	-	0	0
Suppliers identified as having significant actual and potential negative social impacts, with which relationships were terminated as a result of assessment	**%**	**-**	**0%**	**0%**

Notes: with reference to 2023, the entire purchasing process and therefore the qualification of new suppliers of Open Fiber Network Solutions was managed by another consortium company (Amplia) as foreseen in the service contract between Amplia and OFNS, in line with what was established in the Memorandum of Understanding between the parties and the Consortium statute.

7.6 GRI CONTENT INDEX

The GRI Content Index reports references to the Sustainability Report 2025 and to other Open Fiber documents and tools (e.g. website) within which it is possible to find a more detailed discussion or any in-depth analysis related to a specific topic and standard. For each disclosure, the following has been reported:

- the number and description of the reference disclosure;
- the page number or links where the information can be found, either within the report or on other documents published by Open Fiber;
- any comments and omissions.

Statement of use	Open Fiber S.p.A. has reported in accordance with the GRI Standards for the period 01/01/2025 – 31/12/2025
GRI 1 used	GRI: Foundation 2021
Applicable GRI Sector standard(s)	No applicable GRI Sector Standard among those currently available

GRI STANDARD/ OTHER SOURCES	DISCLOSURE	LOCATION	OMISSION			COMMENTS
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
GENERAL DISCLOSURES						
GRI 2: General Disclosure 2021	**The organisation and its reporting practices**					
	GRI 2-1 Organizational details	20-22, 22-29, 35-37, 138-142				Open Fiber S.p.A. Registered Office: Largo Guido Donegani 2 – 20121 Milan (until 04/03/2026), Viale dell'Innovazione 1 – 20126 Milan (from 05/03/2026). Headquarters: Via Laurentina, 449 - 00142 Rome For further details www.openfiber.it
	GRI 2-2 Entities included in the organisation's sustainability reporting	160-161				The data and information in the Open Fiber report refer to Open Fiber S.p.A. and Open Fiber Network Solutions S.c.a.r.l. The entities included in this sustainability report are the same as those included in the consolidated financial statements of Open Fiber.
	GRI 2-3 Reporting period, frequency and contact point	160-161				The reporting period adopted for the report is from 01/01/2025 to 31/12/2025. The reporting period is annual and aligned with the financial reporting period. The Sustainability Report 2025 was published in May 2026. Contacts: csv.of@openfiber.it
	GRI 2-4 Restatements of information	160-161				The previous version of the Open Fiber Sustainability Report (for the year 2024) is available on the company website: https://openfiber.it/en/sustainability/sustainability-report/ For changes in data from previous years and the reasons for them, please refer to the comments in section 7.5 Data and Performance Indicators Tables.
	GRI 2-5 External assurance	250-252				Report of the auditing firm Deloitte & Touche S.p.A.
	Activities and workers					
	GRI 2-6 Activities, value chain and other business relationships	20-22, 22-29, 24-26, 41-43, 152-157, 160-161				For further details www.openfiber.it This report also includes the activities of Open Fiber Network Solutions.
	GRI 2-7 Employees	64-65, 179-181				
	GRI 2-8 Workers who are not employees	179-181				With reference to the companies operating in Creation, Delivery and Assurance, the number of FTEs estimated for the year 2023 is 7,670, for the year 2024 is 9,885 and for the year 2025 is 11,258. FTEs are calculated based on the total number of hours worked, considering the working days in the reference year. The data for 2024 has been updated.

GRI STANDARD/ OTHER SOURCES	DISCLOSURE	LOCATION	OMISSION			COMMENTS
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
GENERAL DISCLOSURES						
GRI 2: General Disclosure 2021	**Governance**					
	GRI 2-9 Governance structure and composition	138-142				The Chief Executive Officer and the Chairman of the Board of Directors are executive directors. The remaining directors are non-executive members. Legal representation is attributed to the Chairman, the Chief Executive Officer and the Deputy Chairman. None of the members of the Board of Directors are independent. There are no under-represented groups. The Board of Directors remains in office for three financial years and its members are eligible for re-election. In general, the Board of Directors includes individuals of different ages and seniority, with diverse and complementary professional skills in order to promote dialogue and the efficient functioning of the Board. In particular, there are skills in the infrastructure sector, financial skills in infrastructure projects and in financing and investment management, as well as legal skills. For information on the gender composition of the Board of Directors, please refer to disclosure 405-1.
	GRI 2-10 Nomination and selection of the highest governance body	-				The Company is managed by a Board of Directors consisting of seven members appointed by the Shareholders' Meeting following the submission of a single list by the sole shareholder (i.e. Open Fiber Holdings S.p.A.). For the appointment procedures and selection of the Board Committees, please refer to paragraph 6.1 Governance and corporate organisation. The Company is not listed and is not subject to special regulations. Therefore, in accordance with the Articles of Association, the list of directors is submitted by the shareholder taking into account: a) criteria relating to diversity and gender balance; b) the declarations made by the persons designated regarding (i) the absence of causes of ineligibility, incompatibility and/or forfeiture and (ii) that they meet the appointment requirements set out in the Articles of Association; c) the skills of each director, according to the different knowledge required for corporate management in the telecommunications sector.

GRI STANDARD/ OTHER SOURCES	DISCLOSURE	LOCATION	OMISSION			COMMENTS
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
GENERAL DISCLOSURES						
GRI 2: General Disclosure 2021	**Governance**					
	GRI 2-11 Chair of the highest governance body	-				The Chairman of the Board of Directors is not a senior executive of the organisation.
	GRI 2-12 Role of the highest governance body in overseeing the management of impacts	138-142				The Board of Directors is responsible for approving the Sustainability Report, prepared annually on a voluntary basis by the organisation. The document illustrates the mission, vision, values and strategies – with a focus on economic, environmental and social aspects – as well as the Company's policies and objectives relating to sustainable development. With reference to the management of risks and their impact related to ESG issues, please refer to what is reported about the Control and Risks Committee in paragraph 6.1 Governance and business conduct.
	GRI 2-13 Delegation of responsibility for managing impacts	-				Open Fiber has established a system of delegated powers and proxies to ensure the management of impacts on the economy, the environment and people. First, the Board of Directors identified the CEO as the Employer, granting him powers in the environmental field as well. The CEO, in turn, based on the activities carried out by each Department, delegated functions to certain company executives. The delegations provide for the distribution of responsibilities in this area and are aimed at ensuring the monitoring of issues pursuant to Legislative Decree 81/2008 and Legislative Decree 152/2006 at all company levels. The delegates identified by the CEO have consequently delegated sub-delegations to their respective reports according to their areas of competence. The departments report on the management of the company's impacts on the economy, the environment and people according to the schedules established annually by the Control and Risk Committee and the Board of Directors.
	GRI 2-14 Role of the highest governance body in sustainability reporting	-				The Board of Directors is responsible for approving the Sustainability Report, which is prepared annually on a voluntary basis.

GRI STANDARD/ OTHER SOURCES	DISCLOSURE	LOCATION	OMISSION			COMMENTS
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
GENERAL DISCLOSURES						
GRI 2: General Disclosure 2021	**Governance**					
	GRI 2-15 Conflicts of interest	-				In general terms, the Company's Code of Ethics and its Organizational, Management and Control Model pursuant to Legislative Decree No. 231/2001 provide that, in the management of any activity, circumstances must be avoided in which the parties involved in transactions are, or may even merely appear to be, in a conflict of interest. Furthermore, in compliance with statutory and by-law provisions, the prior sharing of documentation relating to meetings of the Board of Directors enables each Director to fulfill the duty to disclose any potential conflict of interest in relation to the transaction subject to resolution. Should one or more Directors declare a conflict of interest with respect to the transaction submitted for approval by the Board of Directors, such declaration is duly recorded in the relevant meeting minutes. As a further safeguard ensuring effective control of any conflicts of interest vis-à-vis stakeholders, Article 5 (aa) of the By-laws provides that individuals appointed as Chairman of the Board of Directors, Vice Chairman, Chief Executive Officer, and Chief Financial Officer of the Company must not be in a situation of conflict of interest with the Shareholders, nor with the Company and/or Open Fiber Holdings. With reference to request b) i., as specified in GRI disclosure 2-10, all Directors are required, at the time of appointment, to submit declarations certifying (i) the absence of grounds for ineligibility, incompatibility and/or removal from office, and (ii) the possession of the appointment requirements set forth in the By-laws. Lastly, as anticipated in paragraph 6.1, the Company has established a Related Parties Committee tasked with assessing the fairness and appropriateness of transactions with Related Parties. To this end, following consultation with the Related Parties Committee and the Board of Directors, the Company adopted on 22 December 2022 the "Operational Procedure for the Management of Related Party Transactions," subsequently updated on 27 October 2025. Accordingly, pursuant to the provisions of said Procedure, the Board of Directors receives information on and/or is required to approve certain types of transactions with Related Parties.
	GRI 2-16 Communication of critical concerns	27-28, 142-147				Open Fiber has defined a number of channels to ensure the management and tracking of any critical issues. For more details, please refer to paragraphs 1.3.1 Antitrust Enforcement, 6.1 Governance and business conduct and 6.2 Ethical conduct of business, in particular, the Crisis Committee, the Antitrust Oversight and the "EQS Integrity Line" reporting channels. With regard to ESG issues, there are no critical issues reported to the Board of Directors during the reporting period.

GRI STANDARD/ OTHER SOURCES	DISCLOSURE	LOCATION	OMISSION			COMMENTS
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
GENERAL DISCLOSURES						
GRI 2: General Disclosure 2021	**Governance**					
	GRI 2-17 Collective knowledge of the highest governance body	138-142				Open Fiber has established the Sustainability Committee with the mission of assisting, in a proactive and advisory capacity, the Board of Directors in ESG risk and opportunity assessments and decisions on sustainability issues related to the business with the aim of generating shared value in the long term. The Board of Directors is responsible for approving the Sustainability Report, within which the organisation's strategy in relation to sustainable development is argued.
	GRI 2-18 Evaluation of the performance of the highest governance body	-	a, b, c	Confidentiality constraints	Open Fiber, a single-member joint-stock company subject to the management and coordination of Open Fiber Holdings S.p.A., as it is not listed on the stock exchange, is not subject to the obligation to publish the Remuneration Report (pursuant to Article 123-ter of the Consolidated Law on Finance Legislative Decree No. 58/1998) and thus the information on the performance evaluation procedures of the Board of Directors.	
	GRI 2-19 Remuneration policies	-	a, b	Confidentiality constraints	Open Fiber, a single-member joint-stock company subject to the management and coordination of Open Fiber Holdings S.p.A., as it is not listed on the stock exchange, is not subject to the obligation to publish the Remuneration Report (pursuant to Article 123-ter of the Consolidated Law on Finance Legislative Decree No. 58/1998) and thus information regarding the remuneration of members of the Board of Directors.	
	GRI 2-20 Annual total compensation ratio	-	a, b	Confidentiality constraints	Open Fiber, a single-member joint-stock company subject to the management and coordination of Open Fiber Holdings S.p.A., as it is not listed on the stock exchange, is not subject to the obligation to publish the Remuneration Report (pursuant to Article 123-ter of the Consolidated Law on Finance Legislative Decree No. 58/1998) and thus the information on the procedure for determining remuneration.	

GRI STANDARD/ OTHER SOURCES	DISCLOSURE	LOCATION	OMISSION			COMMENTS
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
GENERAL DISCLOSURES						
GRI 2: General Disclosure 2021	**Governance**					
	GRI 2-21 Annual total compensation ratio	-	a, b, c	Confidentiality constraints	Open Fiber, a single-member joint-stock company subject to the direction and coordination of Open Fiber Holdings S.p.A., as it is not listed on the stock exchange, is not subject to the obligation to publish the Remuneration Report (pursuant to Article 123-ter of the Consolidated Law on Finance Legislative Decree No. 58/1998) and therefore information on compensation paid, including that of the highest-paid individual within the organisation, is not made public. The ratio required by GRI disclosure 2-21 would allow for an almost immediate identification of the value of the remuneration of the highest paid individual being the median values of all employees (excluding the highest paid individual) that can be found by looking at market data in Open Fiber's reference sector. The data, once disclosed would make public information that to date is classified as confidential.	
	Strategy, policies and practices					
	GRI 2-22 Statement on sustainable development strategy	4-5, 10-14				
	GRI 2-23 Policy commitments	10-14, 16-17, 20-21, 46-51, 51-53, 60-61, 80-84, 142-147, 147-149, 150-152, 155-157				Open Fiber's Sustainability Policy, Diversity, Equity & Inclusion Policy, Sustainable Procurement Policy, Energy Policy and Quality, Health, Safety and Environment Policy are available on the Company's website at the following links, respectively: - https://openfiber.it/app/uploads/sites/2/2026/03/Policy-DI_Politica-sostenibilita-ENG.pdf - https://openfiber.it/app/uploads/sites/2/2026/03/Policy-Sustainable-Procurement-ENG.pdf - https://openfiber.it/app/uploads/2026/03/Policy-DI-ITA.pdf - https://openfiber.it/app/uploads/sites/2/2026/03/Politica-Qualita-Salute-Sicurezza-sul-Lavoro-e-Ambiente-EN.pdf - https://openfiber.it/app/uploads/sites/2/2026/03/Politica-Energetica.pdf
	GRI 2-24 Embedding policy commitments	10-14, 16-17, 20-21, 46-51, 51-53, 60-61, 80-84, 142-147, 147-149, 150-152, 155-157				
	GRI 2-25 Processes to remediate negative impacts	14-15, 26-27, 73-75, 142-147, 147-149, 150-152, 161-169				
	GRI 2-26 Mechanisms for seeking advice and raising concerns	142-145, 161-169, 170-173				

GRI STANDARD/ OTHER SOURCES	DISCLOSURE	LOCATION	OMISSION			COMMENTS
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
GENERAL DISCLOSURES						
GRI 2: General Disclosure 2021	GRI 2-27 Compliance with laws and regulations	180-181				The information relating to the fines received during the year 2024 has also been updated.
	GRI 2-28 Membership associations	174-178				
	Stakeholder engagement					
	GRI 2-29 Approach to stakeholder engagement	16-17, 170-173				
	GRI 2-30 Collective bargaining agreements	-				All employees (100%) are covered by a national collective bargaining agreement.
MATERIAL TOPICS						
GRI 3: Material topics 2021	GRI 3-1 Process to determine material topics	14-15, 161-169				
	GRI 3-2 List of material topics	14-15, 161-169				
CONSUMERS AND END USERS						
GRI 3: Material topics 2021	GRI 3-3 Management of material topics	14-15, 26-30, 147-149, 161-169				
GRI 416: Customer Health and Safety 2016	GRI 416-1 Assessment of the health and safety impacts of product and service categories	26-30, 56-60, 147-149				100 % of the services provided by Open Fiber to operators are compliant with current regulations on customer health and safety and therefore include an assessment of health and safety impacts during their delivery. In addition, once work has been completed, Open Fiber's infrastructure is subject to testing, which, in the C&D Cluster is carried out by the Grantor Infratel Italia before it is put up for sale.
	GRI 416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	-				100% of the services provided by Open Fiber to operators are compliant with current regulations on customer health and safety and therefore include an assessment of health and safety impacts during their delivery. In addition, once work has been completed, Open Fiber's infrastructure is subject to testing, which, in the C&D Cluster is carried out by the Grantor Infratel Italia before it is put up for sale. Therefore, there are no reported incidents of non-compliance with regulations and/or voluntary codes regarding health and safety impacts of products and services during the 2023-2025 period.

GRI STANDARD/ OTHER SOURCES	DISCLOSURE	LOCATION	OMISSION			COMMENTS
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
AFFECTED COMMUNITIES						
GRI 3: Material topics 2021	GRI 3-3 Management of material topics	14-15, 35-40, 41-43, 95-103, 103-106, 161-169				
GRI 201: Economic Performance 2016	GRI 201-1 Direct economic value generated and distributed	38-41, 184				
	GRI 201-2 Financial implications and other risks and opportunities due to climate change	46-49, 145-147, 161-169				
	GRI 201-3 Defined benefit plan obligations and other retirement plans	-				Open Fiber and OFNS employees can access the Telemaco supplementary pension fund (National Supplementary Pension Fund for Workers of Telecommunication Companies). Participation is on a voluntary basis and occurs automatically after 6 months of employment in case the employee does not express a contrary will (as provided by the CCNL). In 2025, Open Fiber and OFNS contributed to the fund at a rate equal to 1.4% of each employee's fixed remuneration, amounting respectively to approximately €406.8 thousand (in 2023 the contribution was 1.4% for a total of approximately €327 thousand; in 2024, 1.4% for a total of approximately €374 thousand) and approximately €99.7 thousand (in 2023 the contribution was 1.4% for a total of approximately €3 thousand; in 2024, 1.4% for a total of approximately €62 thousand). No separate funds were established for the payment of obligations under the pension plan by Open Fiber S.p.A. and OFNS S.c.a.r.l.
	GRI 201-4 Financial assistance received from government	185				
GRI 203: Indirect Economic Impacts 2016	GRI 203-1 Infrastructure investments and services supported	38				
	GRI 203-2 Significant indirect economic impacts	38, 95-107				
GRI 413: Local Communities 2016	GRI 413-1 Operations with local community engagement, impact assessments, and development programmes	54-61, 95-102, 103, 105-107				

GRI STANDARD/ OTHER SOURCES	DISCLOSURE	LOCATION	OMISSION			COMMENTS
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
BUSINESS CONDUCT						
GRI 3: Material topics 2021	GRI 3-3 Management of material topics	14-15, 27-28, 142-146, 161-169				
GRI 205: Anti-corruption 2016	GRI 205-1 Operations assessed for risks related to corruption	142-146, 185-187				
	GRI 205-2 Communication and training about anti-corruption policies and procedures	142-146, 185-187				Open Fiber provides training modules aimed at raising the awareness of the entire corporate population on behaviors or circumstances that may occur in the types of offenses provided for in Legislative Decree No. 231/2001, including those related to corruption. With reference to disclosure GRI 205-2a and GRI 205-2d it is reported that all members (100%) of the governing body are aware of and trained on anti-corruption issues as it is the responsibility of the BoD to approve Code of Ethics and OMM 231. With reference to disclosure 205-2c, it is reported that all partners (100%) of Open Fiber (whether suppliers or other collaborators) are obliged to accept and comply with the Code of Ethics and OMM 231.
	GRI 205-3 Confirmed incidents of corruption and actions taken	-				For Open Fiber S.p.A. and OFNS S.c.a.r.l. there are no reported incidents of corruption in the 2023-2025 period.
GRI 206: Anti-competitive behaviour 2016	GRI 206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	27-28				There are no pending or concluded legal actions against Open FiberS.p.A. and OFNS S.c.a.r.l. regarding anti-competitive behaviour and violation of antitrust and monopoly regulations in the 2023-2025 period.
INNOVATION AND DIGITALIZATION						
GRI 3: Material topics 2021	GRI 3-3 Management of material topics	14-15, 114-135, 161-169				
PRIVACY AND CYBERSECURITY						
GRI 3: Material topics 2021	GRI 3-3 Management of material topics	14-15, 147, 161-169				
GRI 418: Customer privacy 2016	GRI 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	147				There were no substatiated complaints regarding breaches of customer privacy nor leaks, thefts, or losses of customer data in the 2023-2025 period.

GRI STANDARD/ OTHER SOURCES	DISCLOSURE	LOCATION	OMISSION			COMMENTS
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
OWN WORKFORCE						
GRI 3: Material topics 2021	GRI 3-3 Management of material topics	14-15, 64-80, 161-169				
GRI 401: Employment 2016	GRI 401-1 New employee hires and employee turnover	64-67, 188-190				
	GRI 401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	74-79				At Open Fiber S.p.A., benefits such as supplementary health insurance and the prevention package are not provided to employees on fixed-term contracts. Occupational and non-occupational accident insurance; supplementary parental leave; supplementary allowances during leave periods; additional leave for bereavement, children's illness, and medical appointments; meal vouchers; supplementary pension schemes; the option to convert the Performance Bonus into welfare goods and services; and wellness-related benefits are provided to all employees (full-time and part-time, permanent and fixed-term). With regard to smart working, this arrangement has been applied to all employees who have signed the second-level collective agreement. Similarly, the same considerations apply to OFNS S.c.a.r.l., with exclusive reference to health insurance and meal vouchers. With regard to smart working, however, the possibility of making use of this arrangement is reserved exclusively for white-collar employees, i.e. those employee categories for whom this working arrangement is compatible and for whom an individual agreement has been signed.
	GRI 401-3 Parental leave	74-79, 84, 191-193				

GRI STANDARD/ OTHER SOURCES	DISCLOSURE	LOCATION	OMISSION			COMMENTS
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
OWN WORKFORCE						
GRI 403: Occupational Health and Safety 2018	GRI 403-1 Occupational health and safety management system	84-85, 147-149				
	GRI 403-2 Hazard identification, risk assessment, and incident investigation	84-85				
	GRI 403-3 Occupational health services	84-85				
	GRI 403-4 Worker participation, consultation, and communication on occupational health and safety	84-85				
	GRI 403-5 Worker training on occupational health and safety	68-73, 84-85, 147-149, 194-195				
	GRI 403-6 Promotion of worker health	74-79				Open Fiber S.p.A. provides health insurance coverage for all employees. Two plans are available: Plan A (fully funded by the Company) and Plan B (jointly funded). The main benefits offered include hospitalisation (with or without surgical procedures), high-level diagnostic and therapeutic services, home and outpatient medical visits, physiotherapy treatments, a prevention package, oncology care, dental care, and corrective lenses/contact lenses. All managed information is handled in compliance with the Company's privacy policies. With reference to OFNS S.c.a.r.l., please refer to GRI disclosure 401-2.
	GRI 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	84-89, 147-149, 152-157				
	GRI 403-9 Work-related injuries	85-86, 195-200				
	GRI 403-10 Work-related ill health	-				There were no cases of occupational disease recognized by INAIL or Open Fiber S.p.A. and OFNS S.c.a.r.l. during the 2023-2025 period.
GRI 404: Training and education 2016	GRI 404-1 Average hours of training per year per employee	68-73, 201				
	GRI 404-3 Percentage of employees receiving regular performance and career development reviews	73-74, 202-203				
GRI 405: Diversity and Equal opportunity 2016	GRI 405-1 Diversity of governance bodies and employees	80-84, 138-139, 204-206				

GRI STANDARD/ OTHER SOURCES	DISCLOSURE	LOCATION	OMISSION			COMMENTS
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION	
CLIMATE CHANGE						
GRI 3: Material topics 2021	GRI 3-3 Management of material topics	14-15, 46-51, 51-54, 147-149, 152-157, 161-169				
GRI 302: Energy 2016	GRI 302-1 Energy consumption within the organisation	51-54, 207-208				
	GRI 302-3 Energy intensity	51-54, 208				
GRI 305: Emissions 2016	GRI 305-1 Direct (Scope 1) GHG emissions	46-51, 209				
	GRI 305-2 Energy indirect (Scope 2) GHG emissions	46-51, 210				
	GRI 305-3: Other indirect (Scope 3) GHG emissions	46-51, 211				
	GRI 305-4 GHG emissions intensity	46-51, 212-213				
	GRI 305-5 Reduction of GHG emissions	46-51				
CIRCULAR ECONOMY						
GRI 3: Material topics 2021	GRI 3-3 Management of material topics	14-15, 60-61, 161-169				
GRI 306: Waste 2020	GRI 306-1 Waste generation and significant waste-related impacts	60-61				
	GRI 306-2 Management of significant waste-related impacts	60-61				
	GRI 306-3 Waste generated	60-61, 214				
	GRI 306-4 Waste diverted from disposal	60-61, 215				
	GRI 306-5 Waste directed to disposal	60-61, 216				
RESPONSIBLE VALUE CHAIN MANAGEMENT						
GRI 3: Material topics 2021	GRI 3-3 Management of material topics	14-15, 152-157, 161-169				
GRI 308: Supplier environmental screening 2016	GRI 308-1 New suppliers that were screened using environmental criteria	152-157, 217				
	GRI 308-2 Negative environmental impacts in the supply chain and actions taken	152-157, 218-219				
GRI 414: Supplier Social Assessment 2016	GRI 414-1 New suppliers that were screened using social criteria	152-157, 220				
	GRI 414-2 Negative social impacts in the supply chain and actions taken	152-157, 221-222				

REPORT OF THE AUDITING FIRM

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INDEPENDENT AUDITOR'S REPORT ON THE SUSTAINABILITY REPORT

To the Board of Directors of Open Fiber S.p.A

We have been assigned to conduct a limited assurance engagement on the Sustainability Report of Open Fiber S.p.A (hereinafter "the Company") and its subsidiary Open Fiber Network Solutions S.c.a.r.l. (hereinafter "OFNS" and, together, "Open Fiber Group" or "Group") as of December 31, 2025.

Responsibility of the Board of Directors for the Sustainability Report

The Directors of Open Fiber S.p.A are responsible for the preparation of the Sustainability Report in accordance with the "*Global Reporting Initiative Sustainability Reporting Standards*" established by GRI – *Global Reporting Initiative* ("GRI Standards"), which they have identified as reporting framework as specified in the "Methodological Note" paragraph in the Sustainability Report.

The Directors are also responsible for such internal control as they determine is necessary to enable the preparation of Sustainability Report that is free from material misstatement, whether due to fraud or error.

The Directors are moreover responsible for setting the Open Fiber Group's goals, with respect to sustainability performance, as well as for the identification of the stakeholders and significant aspects to be reported.

Auditor's Independence and quality control

We have complied with the independence and other ethical requirements of the *International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code)* issued by the *International Ethics Standards Board for Accountants*, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our auditing firm applies *International Standard on Quality Management 1* on the basis of which it is required to set up, implement and operate a quality management system that includes directives or procedures on compliance with ethical principles, professional principles and applicable laws and regulations.

Ancona Bari Bergamo Bologna Brescia Cagliari Firenze Genova Milano Napoli Padova Parma Roma Torino Treviso Udine Verona

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Auditor's responsibility

Our responsibility is to express our conclusion based on the procedures performed about the compliance of the Sustainability Report with the GRI Standards.

We conducted our work in accordance with the criteria established in the "*International Standard on Assurance Engagements ISAE 3000 (Revised) – Assurance Engagements Other than Audits or Reviews of Historical Financial Information*" (hereinafter "*ISAE 3000 Revised*"), issued by the *International Auditing and Assurance Standards Board* (IAASB) for limited assurance engagements. The standard requires that we plan and perform the engagement to obtain limited assurance whether the Sustainability Report is free from material misstatement.

Therefore, the procedures performed in a limited assurance engagement are less than those performed in a reasonable assurance engagement in accordance with ISAE 3000 *Revised ("reasonable assurance engagement")*, and, therefore, do not enable us to obtain assurance that we would become aware of all significant matters and events that might be identified in a reasonable assurance engagement.

The procedures performed on Sustainability Report are based on our professional judgement and included inquiries, primarily with Company personnel responsible for the preparation of information included in the Sustainability Report, analysis of documents, recalculations and other procedures aimed to obtain evidence as appropriate.

Specifically, we carried out the following procedures:

1. analysis of definition process of relevant topics disclosed in the Sustainability Report, with reference to the methods of analysis and understanding of the reference context, identification, assessment and prioritisation of actual and potential impacts and internal validation of process findings;

2. comparison between the financial data and information included in the paragraph titled "Economic performance" in the Sustainability Report with those included in the consolidated financial statements of the Group;

3. understanding of the processes underlying the generation, collection and management of significant qualitative and quantitative information included in the Sustainability Report.

   In particular, we carried out interviews and discussions with the management of Open Fiber S.p.A. and we have carried out limited documentary verifications, in order to gather information about the processes and procedures which support the collection, aggregation, elaboration and transmittal of non-financial data and information to the function responsible for the preparation of the Sustainability Report.

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In addition, for material information, taking into consideration the Group's activities and characteristics:

- at the parent company level:

  a) with regards to qualitative information included in the Sustainability Report we carried out interviews and gathered supporting documentation in order to verify its consistency with the available evidence;
  b) with regards to quantitative information, we carried out both analytical procedures and limited verifications in order to ensure, on a sample basis, the correct aggregation of data.

- for Open Fiber S.p.A., which we selected based on its activities, their contribution to the performance indicators at the consolidated level, we carried out site visits, during which we have met the management and have gathered supporting documentation with reference to the correct application of procedures and calculation methods used for the indicators.

Conclusion

Based on the work performed, nothing has come to our attention that causes us to believe that the Sustainability Report of Open Fiber S.p.A. and its subsidiary as of December 31, 2025 is not prepared, in all material respects, in accordance with the GRI Standards as describes in the paragraph "Methodological Note" in the Sustainability Report.

DELOITTE & TOUCHE S.p.A.

Signed by
Francesco Legrottaglie
Partner

Rome, Italy
April 10, 2026

This report has been translated into the English language solely for the convenience of international readers.

Design and Layout
PRC PROMOTION RESEARCH CONSULTANCY


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