Italtel Group
Sustainability Policy

Issue date	November 09th, 2026
Confidentiality class	Public Document
Issued by	Internal Audit & Sustainability
References	Italtel 2025 Sustainability Report Italtel Code of Ethics Organizational, Management and Control Model (Legislative Decree 231/2001) Supplier Code of Conduct Sustainable Procurement Policy Anti-bribery Policy Whistleblowing Procedure Italtel Group Gender Equality Policy Regulation of cases of Conflict of Interest Policy on Governance and Responsible Use of Artificial Intelligence
Approver	**Carlo Filangieri**, *CEO & General Manager*, upon proposal of the ESG committee

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Italtel

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1 BACKGROUND

Italtel (Italtel S.p.A. and its subsidiaries that form the Italtel Group) recognizes the impacts of its operations and its value chain and considers sustainability one of its primary responsibilities and an indispensable condition of its success. Italtel operates in accordance with established ethical, social, environmental and governance principles that are supported by its management and shared with its stakeholders.

2 VISION

Italtel is committed to integrating sustainability into its business strategy, minimizing the environmental and social impact of its operations and by delivering innovative and sustainable digital solutions. Technology thus becomes an enabling tool to promote sustainability along the entire value chain. In this context, Italtel supports the objectives of the Paris Agreement and the transition to a low-carbon and climate-resilient economy through continuous improvement, innovation, responsible resource management and the implementation of its Climate Transition Plan. The Company is committed to pursuing climate neutrality (Net Zero) by 2050 and to progressively reducing greenhouse gas emissions, increasing the use of renewable energy, improving resource efficiency and strengthening climate resilience throughout its operations and value chain.
Italtel is committed to embed in its sustainability strategy the UN Sustainable Development Goals (SDGs), in particular the:

- **Goal 5:** Achieve gender equality and empower all women and girls;
- **Goal 6:** Clean water & sanitation
- **Goal 7:** Affordable and clean energy;
- **Goal 8:** Promote inclusive and sustainable economic growth, employment and decent work for all;
- **Goal 9:** Build resilient infrastructure, promote sustainable industrialization and foster innovation;
- **Goal 11:** Make cities inclusive, safe, resilient and sustainable;
- **Goal 12:** Ensure sustainable consumption and production patterns.
- **Goal 13:** Climate action

3 SCOPE

This Policy defines the framework of Italtel's commitments to sustainable development, in accordance with ESG (Environmental, Social and Governance) topics deemed most relevant to the organization and its stakeholders. These commitments are continuously translated into concrete objectives, targets and actions. It applies to Italtel S.p.A. and all its subsidiaries and

is communicated and extended to all stakeholders in Italy and abroad. Personnel, managers, corporate bodies and all those who work in the name and on behalf of the Company must know and understand the commitments undertaken in this Policy and contribute to the achievement of the sustainability goals according to their role and expertise.

4 METHODOLOGY

The Sustainability Policy is grounded in the double materiality assessment performed by the company in April 2025 and addresses the ESG topics identified through this exercise. Periodically, Italtel, with the support of the relevant ESG Topic Owners, updates its materiality assessment in order to refine and update the list of relevant ESG impacts, risks and opportunities and the related sustainability matters. This ensures the establishment of credible priorities aimed at mitigating potential negative impacts and maximizing positive outcomes wherever possible.
Based on the most relevant topics, Italtel assesses its contribution to one or more of the United Nations Sustainable Development Goals (SDGs) and their corresponding targets, as disclosed in the company's annual Sustainability Report.
This policy should be read in conjunction with other relevant group policies, including:

- The **Code of Ethics**;
- The **Italtel Group Gender Equality Policy**;
- The **Regulation of cases of Conflict of Interest**;
- The **Anti-bribery Policy**;
- The **Whistleblowing Procedure**;
- The **Sustainable Procurement Policy**;
- The **Policy on Governance and Responsible Use of Artificial Intelligence**.

5 ENVIRONMENTAL

Italtel recognizes its responsibility towards the environment and is committed to reducing its environmental impact at every stage of its operations and throughout its value chain, with particular focus on greenhouse gas emissions, energy consumption, and the management, collection, and recycling of waste.

5.1 Mitigation and Adaptation to Climate Change

Italtel acknowledges climate change as one of the most urgent global challenges and is actively engaged in addressing its causes through targeted actions aimed at reducing greenhouse gas emissions and promoting the energy transition.
In particular, Italtel is committed to:

- Annually measuring greenhouse gas (GHG) emissions across Scopes 1, 2, and 3, with the goal of identifying the company activities that contribute most to climate change and defining actions to reduce emissions.
- Reducing GHG emissions by promoting alternative working methods that minimize commuting (e.g. remote working) and business travel (e.g. the use of videoconferencing).
- Developing and providing products, services and solutions that offer the best performance while minimizing energy consumption in the use-phase and greenhouse gas emissions during the entire life cycle.
- Preferring rail travel over air travel for domestic trips to limit emissions.
- Replacing company cars with low environmental impact vehicles (e.g. hybrid and electric cars)
- Monitoring energy consumption and implementing performance indicators aligned with energy audits.
- Transitioning to renewable energy sources to power the Group's various sites.
- Raising employee awareness regarding the sustainable and efficient use of energy resources.

Ongoing implementation of initiatives aimed at improving energy efficiency, also in close collaboration with the companies that own the sites where Italtel carries out its activities (e.g. efficient alternatives such as LED lighting, optimized cooling solutions of IT infrastructures). Italtel's commitments will be achieved through specific targets:

- Achieve a 15% reduction in Scope 1 total emissions by 2031, compared to 2025 levels;
- Achieve a 20% reduction in Scope 2 (location based) total emissions by 2031, compared to 2025 levels;
- Ensure that 100% of electricity consumed across all Group sites comes from certified renewable sources by 2031.

Italtel also aims to adopt a decarbonization plan validated by the Science Based Targets initiative and to offset residual emissions, in line with its commitment to reducing GHG emissions across Scopes 1, 2, and 3. Additionally, Italtel plans to migrate its digital workloads to high energy-efficiency data centers powered by renewable sources, and to evaluate the achievement of ISO 50001 certification for energy management efficiency.

5.2 Circular economy and waste management

Recognizing the environmental impact of waste production, proper waste management is a fundamental pillar of Italtel's environmental strategy. Italtel is committed to adopting a circularity approach, by promoting recycling and reduce waste generation by identifying more sustainable alternatives to traditional or disposable materials. The waste generated at Italtel's offices is primarily domestic in nature, as the company does not conduct any manufacturing activities.

In particular, Italtel is committed to:

- Ensuring the proper sorting of domestic waste, which is essential for more effective recycling processes.
- Actively raising employee awareness about the importance of waste reduction, with a particular emphasis on minimizing plastic use.
- Reducing the consumption of plastic bottles, plates, and cups by encouraging the use of sustainable alternatives such as reusable water flasks and the installation of drinking water dispensers in the workplace.
- Reducing paper consumption by digitalizing internal document workflows and promoting remote working.

Italtel's commitments will be achieved through this specific target:

- Practice separate waste collection in 90% of Italtel Group sites by 2028.

Italtel also aims to develop internal guidelines to support the selection, integration and adoption of digital solutions and technologies that embrace circular economy principles, favouring hardware and software characterized by durability, upgradability, reparability and responsible end-of-life management. As a system integrator, Italtel will promote these principles both in the technologies and equipment adopted within the Company and in the solutions delivered to customers, encouraging the use of products and services provided by partners and suppliers that meet the same sustainability and circularity criteria, also leveraging Life Cycle Assessment (LCA) criteria.

6 SOCIAL

Italtel is committed to protecting the health and safety of all its employees and conducts its activities with full respect for fundamental human rights. It guarantees equal opportunities in the workplace for everyone, regardless of gender, marital status, sexual orientation, religious beliefs, political or trade union affiliation, race, ethnic origin, nationality, age, or differing abilities.

Moreover, Italtel provides positive working conditions that support employee well-being, fostering the continuous development of their skills, and ensuring fair, non-discriminatory opportunities for professional and career advancement.

Italtel also supports the right of all employees to freely associate and engage in collective bargaining, in accordance with the applicable laws of the countries in which it operates.

6.1 Occupational health and safety

The protection of employees' health and safety is a top priority for Italtel.

Italtel adopts all reasonable and feasible preventive and protective measures to safeguard the health and safety of its employees, with the aim of eliminating potential causes of workplace injuries or occupational illnesses, in compliance with the applicable regulations in the countries

where it operates. In recognition of its commitment to high standards in occupational health and safety management, Italtel S.p.A. has obtained ISO 45001 certification.
Italtel is committed to conducting risk assessments to minimize the occurrence of workplace injuries and accidents.
Italtel is also dedicated to providing comprehensive health and safety training to all employees, with particular attention to those with delegated authority and responsibilities in this area.
Italtel's commitments will be achieved through specific targets:

- Italtel is committed to maintain in the future the same excellent results related to workplace safety, especially about injuries and professional illnesses, achieved so far (in 2025, a single workplace accident was recorded across the Group, which employs more than 1,000 people and accounted for approximately 1.9 million hours worked).
- Provide Health and Safety Training to 90% of employees by 2027.

6.2 Diversity, equity and inclusion

Italtel is committed to promoting and safeguarding diversity and equal opportunities in the workplace by fostering an inclusive environment that ensures equal opportunities for talent development and professional growth for all individuals. The company values and manages people's unique qualities and needs effectively, fairly, and with full respect for diversity.
For this reason, Italtel S.p.A. has obtained the UNI/PdR 125:2022 certification, a standard valid in Italy, that sets out guidelines for a gender equality management system.
Italtel's commitments, detailed in the Italtel Group Gender Equality Policy and in the Code of Ethics, will be achieved through specific targets:

- Provide training on diversity, equity and inclusion to 80% of employees by 2027;
- Lower the Group gender pay gap (GPG) to 8.33% by 2030;
- Maintain no reports or complaints related to any form of discrimination annually.

6.3 Working conditions

Italtel guarantees excellent working conditions for all its employees, promoting a healthy work-life balance and safeguarding their overall well-being.
Italtel also ensures that employment contracts are established in full compliance with the regulations in force in the countries where it operates, taking into account key aspects such as fair and competitive compensation, appropriate working hours, paid leave and holidays, and all other elements necessary to guarantee employee well-being through high-quality working conditions. Furthermore, to enhance employees' working conditions, particularly their work-life balance, Italtel offers the option of remote working.
Italtel's commitments will be monitored through the following key performance indicator:

- Maintain access to flexible working arrangements for at least 90% of eligible employees at Group Level by 2028, in accordance with local regulations and organizational requirements.

6.4 Career development

Italtel is committed to fostering a work environment that supports the development and professional growth of its people, recognizing career advancement as a key factor in attracting, retaining, and motivating talent.
Italtel is continuously dedicated to providing employees with ongoing training to enhance their skills, and to ensuring that development and advancement opportunities are unconditionally accessible to all, based on merit and competence.

- Italtel's commitments, detailed in the Code of Ethics, will be achieved through specific targets:
- Increase the percentage of employees covered by an MBO (Management by Objectives) system to 27% by 2030.

6.5 Safeguarding of freedom of association

Italtel is committed to upholding and respecting workers' rights to freely associate and engage in collective bargaining, in accordance with the laws in force in all countries where it operates. Italtel also strives to promote and maintain active social dialogue with employee representatives and trade unions, fostering an environment of transparency and mutual trust.
Italtel's commitments, detailed in the Code of Ethics, will be achieved through specific targets:

- Organize at least 4 formal meetings per year with employee representatives at the company level through 2030.

7 GOVERNANCE

In carrying out its activities, Italtel acts with fairness, loyalty, transparency, and integrity, both directly and through its subsidiaries, ensuring full compliance with all applicable laws and regulations in every market in which it operates. This approach entails strict adherence to rules concerning anti-corruption and bribery, conflicts of interest, fraud, money laundering, and information security.
Italtel encourages employees, collaborators, and all individuals acting on its behalf in any capacity to report any instances, or well-founded suspicions, of bribery, corruption, conflicts of interest, fraud, money laundering, or information security violations, or other unlawful or unethical conduct, through the channels defined in the **Whistleblowing Procedure**, including the whistleblowing platform (https://www.italtel.com/whistleblowing/). Italtel guarantees protection against any form of retaliation resulting from reports made in good faith.

7.1 Anti-bribery and corruption

Italtel prohibits any form of active and passive corruption, both direct and indirect, and is strongly determined to combat any violation of anti-corruption laws that may involve its staff, the staff of its subsidiaries, or anyone acting on its behalf.
For this reason, Italtel S.p.A. has created an anti-bribery management system, in compliance with the ISO 37001 standard, through which, suitable measures have been defined aimed at monitoring the effectiveness of the related prevention system and its continuous improvement, in order to promote the strengthening of the corporate culture based on correctness, transparency and integrity of every commercial relationship.
Italtel's commitments, detailed in the Anti-bribery Policy and in the Code of Ethics, will be achieved through specific targets:

- Provide training on ethical business, including corruption and bribery topics, to 85% of employees by 2028;
- Maintain zero cases of corruption annually recorded.

7.2 Conflict of interests

Italtel is committed to preventing situations that could give rise to conflicts of interest. As part of this commitment, Italtel has established a procedure requiring managerial and non-managerial staff, as well as external collaborators with signatory authority, both in Italy and abroad, to periodically submit a declaration regarding the presence or absence of any potential conflicts of interest.
A conflict of interest is defined as a situation in which an individual, due to their role, office, or position, has decision-making responsibilities or is required to carry out actions that could be potentially advantageous or disadvantageous to themselves or to another person with whom they have a personal, professional, business, or familial relationship.
Italtel's commitments, detailed in the Regulation of cases of Conflict of Interest and in the Code of Ethics, will be achieved through specific target:

- Maintain zero recorded cases of conflicts of interest annually.

7.3 Fraud

Italtel recognizes the importance of preventing and combating fraud as fundamental to ensuring the integrity, transparency, and ethical conduct of its operations.
The company adopts a proactive approach by implementing internal controls, providing continuous staff training, and ensuring compliance with applicable laws and regulations.
Italtel's commitments, detailed in the Code of Ethics, will be achieved through specific targets:

- Provide training on ethical business, including anti-fraud topics, to 85% of employees by 2028;
- Maintain zero recorded cases of fraud annually.

7.4 Money laundering

Italtel is dedicated to the prevention of money laundering through strict adherence to all relevant national and international regulations.
The company implements robust measures and controls to identify and prevent suspicious activities, ensuring transaction transparency and the integrity of relationships with customers, suppliers, and partners.
Italtel also provides comprehensive training to all employees to educate them on the principles and behaviors necessary to prevent involvement in money laundering offenses.
Italtel's commitments, detailed in the Code of Ethics, will be achieved through specific target:

- Provide training on ethical business, including money laundering topics, to 85% of employees by 2028;
- Maintain zero recorded cases of money laundering annually.

7.5 Information Security & Cybersecurity

At Italtel, cybersecurity is a top priority. Safeguarding data, assets, networks, and services against risks and threats is essential for ensuring business continuity and driving growth through digital transformation.
For this reason, Italtel is committed to safeguarding its own confidential information, as well as that of its employees, clients, and business partners.
Italtel has therefore implemented an Information Security Management System in compliance with ISO/IEC 27001 standard, with the goal of ensuring the confidentiality, integrity, and availability of information.
Italtel's commitments, detailed in the Code of Ethics and in the Policy on Governance and Responsible Use of Artificial Intelligence, will be achieved through specific targets:

- Achieve ISO 27001 certification by 2030 for 100% of Italtel Group companies providing network business support services, including Network Management, Maintenance & Security;
- Provide training on cybersecurity and the ethics of artificial intelligence to 80% of employees by 2028.

7.6 Data Privacy and Personal Data Protection

Italtel S.p.A. and its subsidiaries process personal data in compliance with applicable data protection laws and regulations in the countries where they operate, including Regulation (EU) 2016/679 (GDPR) for the EMEA region and equivalent or applicable local data protection frameworks in other jurisdictions.
The Group is committed to ensuring that personal data are processed lawfully, fairly and transparently, with appropriate technical and organizational measures designed to protect the rights and freedoms of data subjects.

Italtel's commitments, detailed in the Code of Ethics, will be achieved through a specific target:

- Maintain zero cases of personal data breaches annually.

8 SUSTAINABLE PROCUREMENT

Italtel recognizes the importance of responsible supply chain management to minimize negative effects on both the planet and society. To achieve this, Italtel promotes sustainable procurement practices and integrates environmental, social, and ethical considerations into its purchasing decisions.
Italtel promotes responsible business practices across its entire supply chain, encouraging suppliers to integrate ethical, social, and environmental considerations into their operations. Through its Supplier Code of Conduct, Italtel requires its suppliers, partners, and all parties involved in business relationships with the company to uphold its commitments to environmental, social, and governance (ESG) sustainability.
Italtel's commitments, detailed in the Sustainable Procurement Policy, will be achieved through specific targets:

- Ensure that ESG criteria are integrated into the qualification and periodic assessment process of all relevant suppliers by 2030, promoting a continuous increase in ESG-compliant suppliers across the Group;
- Train 100% of employees in the procurement office on environmental issues in the supply chain by 2028;
- Train 100% of employees in the procurement office on social issues in the supply chain by 2028.

9 ROLES AND RESPONSIBILITIES

The overall responsibility for determining Italtel's sustainability policy and overseeing its implementation lies with the Group CEO.
The Internal Audit & Compliance team is responsible for drafting the policy, presenting its key objectives to the ESG Committee, and developing initiatives and tools to enhance the company’s ESG performance. The team also identifies best practices and solutions to support the achievement of the company’s commitments and targets.

10 VALIDITY AND REVIEW

Italtel’s Sustainability Policy is reviewed regularly, particularly in response to significant changes in the Group’s activities, relevant regulations, or stakeholder expectations. This ensures alignment with the company's evolution, external best practices, business drivers, and applicable regional or global legislation. The objective is to maintain the relevance and

applicability of the commitments made, in line with the Group's broader sustainability plans. All updates to the policy are communicated to relevant stakeholders.

The **Sustainability Policy** is approved by the ESG Committee, which maintains a record of all approved updates. Final approval is granted by the **CEO & General Manager of Italtel S.p.A.**

11 INFORMATION AND COMMUNICATION

This Policy is published on the corporate website in the Certification & Resource section (https://www.italtel.com/sustainability/).
Stakeholders may seek clarification regarding this policy through the contact section of the website: https://www.italtel.com/our-sites/ or by emailing to ESG@italtel.com.

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10.11.2026
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