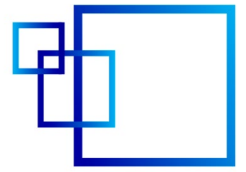




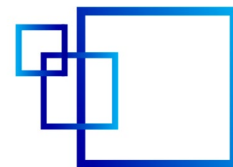
# Sustainability Policy

March 2021



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## FOREWORD

Rai Way S.p.A. (hereinafter referred to as "Rai Way" or the "Company") is an industry leader in infrastructure and broadcasting, tower rental and integrated network services for broadcasters, telecommunications operators, private companies and public administration.

In light of the events and changes that are still taking place across the media sector and its related infrastructures affecting the Company, its stakeholders and the entire industry, the Company has set out commitments and implementation principles to be followed and developed to ensure responsible and sustained business management.

This Policy has been developed with the aim of integrating sustainability into the company's strategy and operations. It includes the provisions of the Code of Ethics and the following Company Policies:

- Quality Policy;
- Environment, Health and Safety Policy;
- Privacy Management Policy;
- Anti-Corruption Policy.

The aim of this document is to set out and reinforce Rai Way's commitment to issues it considers crucial to its operations, such as service quality, environmental protection, responsibility to stakeholders, and conducting business ethically and responsibly, as well as an ongoing commitment to innovation and digital transformation.

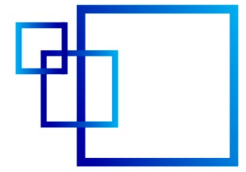
Additionally, the Policy emphasises, formalises and expresses the company's conviction that generating long-lasting, sustainable value must be pursued in full compliance with the ethical principles of legality and fairness, integrity and honesty, and impartiality and transparency, while applying practices for continuous improvement as well as operation efficiency and economical management criteria.

With a sense of responsibility and recognising the importance of generating social and environmental value in its operations, not only economic value, Rai Way has identified commitments and priorities guided by high national and international responsible business principles and standards, which will nourish its contribution to a more sustainable future business context.

## 1. Scope and addressees

The values and principles set out below are binding for the Addressees of this Policy, specifically for:

- Corporate Bodies, the Chief Executive Officer, other executives, and employees, hereinafter collectively referred to as "Company Representatives";
- all collaborators, of any kind, even occasional and/or temporary, and all those who have any commercial and/or financial relationship with Rai Way, or who act on their behalf on the basis of specific mandates (e.g. consultants, suppliers, partners, agents, concessionaires, intermediaries), hereinafter, collectively, "External Collaborators";
- all Company Representatives and External Collaborators of companies directly or indirectly controlled by Rai Way (where applicable) and to those the contents of the Code of Ethics are intended to be applicable.



## 2. Environmental commitment

Rai Way considers protecting the environment a strategic element for its sustainable success. As such, in addition to complying with current regulations and standards, it has its own Environmental Management System, subject to ISO 14001:2015 certification, and an "Environment Health and Safety" Policy.

The Company's environmental commitment materialises as specific actions, such as:

- **Adopting procedures for controlled management and emission reduction**

To lower the emissions of CO<sub>2</sub> and substances considered harmful to the ozone layer, Rai Way uses renewable energy and has systems for monitoring energy consumption.

- **Consciously managing resources to respect the natural environment, ecosystems and biodiversity**

Broadcasting station operations are carried out with respect for the surrounding environment. Specifically, Rai Way commits to controlling discharge, waste disposal and water resource management, in line with the relevant regulations.

- **Preventing, controlling and reducing its environmental impact**

Through its ISO 14001:2015 certified Environmental Management System, Rai Way identifies and evaluates the environmental impact of its operations. The significance of each environmental impact identified is determined through analysing various relevant factors and, where necessary, implementing any mitigating actions.

- **Promoting sustainable mobility**

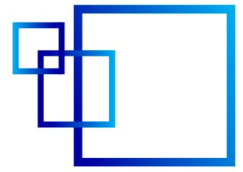
Rai Way encourages the use of public transport and/or systems with low environmental impacts.

## 3. Social and community commitments

### **Worker health and safety**

To ensure the greatest protection of workers' health and safety, Rai Way has adopted an ISO 45001:2018 certified Worker Safety Management System in addition to complying with the current regulations and standards, as well as an "Environment, Health and Safety" Policy which declares its commitment to:

- keep staff trained and informed on issues of health and safety at work, providing training courses for all personnel;
- maintain and reinforce the accident and injury prevention system;
- hold the entire corporate structure responsible for properly applying the procedures drawn up for managing environmental, health and safety aspects at work.



## **Diversity and equal opportunities**

Rai Way ensures respect for diversity and equal opportunities in both seeking and selecting staff, and in employee management and development, aimed at individuals' professional growth.

In the process of selecting and managing human resources, the Company is guided by the general principles of transparency, impartiality and merit, in compliance with the relevant regulations and internal provisions.

Additionally, Rai Way commits to creating a working environment where personal traits such as age, sex, race, language, nationality, political and trade union views and religious beliefs do not form any basis for discrimination.

## **Human Rights**

Rai Way ensures and protects its workers' rights and promotes their physical and moral integrity through working environments and conditions that are consistent with best practices, respecting all current primary and secondary national regulations (which implement, among others, the ILO - International Labour Organisation - conventions, ratified by Italy, including all fundamental and governance conventions).

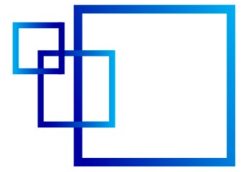
The Company's actions to protect human rights are in line with Agenda 2030 and the Charter of Human Rights (also with respect to the prohibition of any form of forced or child labour).

## **Employee development**

The distinctive features of Rai Way's actions can be seen in a framework that constantly focuses on "human resources", as a strategic factor for the Company's growth and from a stance that supports and encourages generating value and reaching corporate objectives, while ensuring sustainable results and staff's well-being and full engagement.

Aiming to enhance "human resources", Rai Way:

- commits to training staff, in line with the principles of life-long learning, seeing skill development and innovation in systems as drivers of the continuous improvement of corporate performance;
- ensures the continuous enhancement of the results and behaviours shown, promoting the individual's centrality to the organisation through a culture of development geared towards objectives and results, including long-term;
- implements organisational smart working solutions - also aiming to encourage eco-sustainable mobility - and work-life balance options, adopting welfare and benefit systems as well;
- initiates a network of institutions, schools, associations and universities to increase knowledge from a corporate social responsibility perspective.



### **Ensure continued compliance with regulations on electromagnetic radiations**

Rai Way ensures compliance with national and EU regulations on electromagnetic radiations in order to protect the environment, the public and workers. In addition, the Company is committed to containing such radiations through mapping, monitoring, verification, issue management and impact assessment practices.

### **Reduce noise and landscape impact**

Rai Way responsibly manages noise pollution, mainly caused by sounds emitted from its infrastructures, and ensures respect for local area requirements for the environmental protection of landscape and nature.

### **Area and community**

Recognising its responsibilities, social and environmental as well as economic, and due to its widespread presence across the country, Rai Way fosters relationships with various local actors, including in key corporate social dimensions, through: relationships with Schools and Universities; supporting initiatives dedicated to promoting female talent and employment; supporting non-profit associations operating with specific social issues.

## **4. Commitment to ethical and responsible business management**

Rai Way has adopted an 'Anti-corruption Policy' that identifies specific measures to prevent corruption and relevant control principles, integrated into the protocols of the Organisation, Management and Control Model as per Legislative Decree 231/2001 and the Company's internal regulations, and sets out its own organisational models in line with the structure outlined.

To spread a culture of ethics and legality throughout the company, Rai Way has initiated specific 'whistleblowing' reporting channels which the Company's employees, suppliers, clients, partners and collaborators can use to report conduct that may be contrary to the principles and behaviours provided for in the Code of Ethics, Anti-Corruption Policy and Organisation, Management and Control Model as per Legislative Decree 231/2001.

In particular, Rai Way is committed to ethically and responsibly managing its relationships with its main stakeholders:

### **Government Bodies**

Rai Way ensures its Public Administration relationships are underpinned by the prevention of corruptive phenomena.



## **Suppliers**

Rai Way's purchasing processes are geared towards establishing business relationships with economic operators that meet the morality and reliability requirements, in compliance with the current applicable regulations and internal guidelines.

In particular, relationships with suppliers are guided by transparency, equality, fairness and free competition.

Freedom of association and corporate grouping are guaranteed in the procurement process, allowing for synergies between small and medium-sized enterprises, respecting the labour protection, social security, insurance and contributions provisions, together with the implementation of collective bargaining provisions.

Through IT and online innovation processes, Rai Way is able to fully trace all procurement stages.

## **Customers**

Rai Way focuses its operations on satisfying customers and public service broadcasting users' needs, striving to improve its the services offered and directing its research, development and marketing operations towards the highest quality standards.

Specifically, the Company commits to comply with internal procedures for ethically managing customer relationships by, among other things, providing accurate, truthful and comprehensive information about the services offered, so customers can make informed decisions.

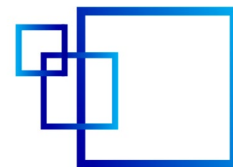
To guarantee that customers are provided with high-quality products and services, the Company has implemented a Quality Management System that complies with the international ISO 9001:2015 standard requirements and is guided by the principles outlined in the "Rai Way S.p.A. Quality Policy".

## **Responsible data management**

Rai Way continuously scrutinises the use of information technology and responsible data management, providing information on data processing purposes and methods, and the use of protection systems including through adjusting to regulatory and technological evolution.

## **Press and Media**

In its relationships with the press and media, Rai Way upholds the values of its Code of Ethics, particularly transparency and the utmost protection of its general interest in the correctness and completeness of disclosed information, in compliance with the know-how and principles of business confidentiality, particularly in terms of being a company with shares listed on the Stock Exchange.



## 5. Commitment to technological advancement

Rai Way believes innovation, technological research and digital transformation are strategic tools for enhancing its know-how and infrastructural assets, promoting the sustainable development of its business model. To this end, the Company oversees the development of business operations and promotes generating value for customers, shareholders and, more broadly, for the Country's economic and social fabric.

In particular, Rai Way commits to:

- enable company and stakeholders' digital evolution;
- invest in research and development for innovative infrastructure uses;
- strengthen digital development skills.

## 6. Management and Monitoring

Rai Way has adopted an Organisation, Management and Control Model pursuant to Legislative Decree no. 231/2001 as well as a Code of Ethics, which forms an integral part of said Model. The Code of Ethics contains ethical and behavioural principles which guide the operations of those who work or interact with Rai Way either temporarily or on an ongoing basis. It takes into account their respective roles, the complexity of their functions and the responsibilities assigned in order to pursue the Company's goals.

In addition, in line with the relevant provisions of the Code of Corporate Governance for Listed Companies, Rai Way has adopted an Internal Control and Risk Management System (ICRMS) presented as a set of organisational controls, tools, standards, and company rules. These are intended to enable healthy, correct and coherent company management through appropriate identification, evaluation, management and main risk monitoring processes, including those relevant to sustainability.

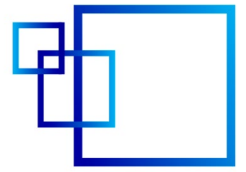
The designing, implementing and maintaining, as well as regularly reviewing of the ICRMS is guided by the Code of Corporate Governance for Listed Companies, international standards, and relevant best practices, conforming to the 2013 CoSO Report Integrated Framework (Committee of Sponsoring Organizations of the Treadway Commission, Internal Control, Integrated Framework).

In particular, the ICRMS oversees and monitors environmental, social and governance risks, among other things, according to the guidance of Legislative Decree no. 254/2016.

## 7. Reporting

Rai Way commits to reporting its sustainability performance in public corporate documents made available to stakeholders, mainly through the company website. These documents describe management and monitoring methods, identified risks, results of assessment activities and management and mitigation actions.





## 8. Disclosure

Relevant Stakeholders are informed of this Policy - and therefore the Company's specific principles and values contained herein regarding sustainability - through appropriate communications as well as the Policy being published on the corporate website making it widely available.

## 9. Policy revision and approval

This Policy was approved by Rai Way's Board of Directors after being examined by the Control, Risks and Sustainability Committee, and is updated regularly or in case of significant changes in the relevant regulatory, organisational, strategic or operational context.