



ESG
Procurement Policy

WIIT
THE PREMIUM CLOUD

“A credible sustainability integration process must include an active management of the environmental, social and economic aspects relevant to a company's value chain. WIIT's ESG Procurement Policy represents a milestone in the Group's growth path and, with this document, we formalise our commitment to help build a responsible supply chain that respects the environment and the people involved.”

Milan, July 2022

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CEO WIIT S.p.A.



WIIT S.p.A., a leading provider of Cloud services for the management of critical applications, has been accompanying companies on their path to digital transformation for over 20 years.

In line with the path of integrating sustainability into the business initiated by the company, WIIT has defined a Group ESG Procurement Policy with the aim of affirming its commitment to a sustainable and responsible supply chain management.

The contents of this Policy set out the guiding principles, the topics, the commitments and the criteria that WIIT considers fundamental in order to create sustainable value throughout its value chain.

This document is directed towards all suppliers of Group Companies, who are asked to read, sign and comply with the contents of the ESG Procurement Policy.

KNOWLEDGE PARTNER

The European House-Ambrosetti

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INTRODUCTION

WIIT promotes a responsible supply chain management, in order to ensure that its products and services are offered with full respect for human rights, the environment and the dignity of workers.

The aim of the ESG Procurement Policy is to describe WIIT's commitment to active dialogue with its suppliers, in order to share the Group's values, to identify and manage the most relevant topics for its supply chain, and to minimise the negative environmental, social and economic impacts generated by its activities at each stage of the value chain.

THE PRINCIPLES UNDERLYING A RESPONSIBLE SUPPLY CHAIN

A Group such as WIIT, committed to integrating sustainability into its business model in an increasingly structured way, **must consider and manage the impacts of its supply chain**.

We are aware that our sourcing choices can have a major social and environmental impact and, for this reason, in line with our ESG Policy, **we are committed to ensuring the application of social environmental sustainability and governance criteria in our supplier selection, management and monitoring processes**, structurally integrating sustainability into the corporate Business Model.

Our aim is to minimise the negative social and environmental externalities of our value chain, with the ambition to have, at the same time, a positive impact on the people and communities involved.

| THE PRINCIPLES OF OUR RESPONSIBLE SUPPLY CHAIN | | |
|--|---|---|
| Transparency | Responsibility | Improvement |
| We guarantee maximum transparency in our supplier selection and evaluation processes | We make our choices conscious of our responsibility throughout the entire Group value chain | We involve our suppliers in continuous improvement processes, in order to spread the application of best market practices |

WIIT forges strong partnerships with its suppliers, underpinned by a shared commitment to operate ethically and with respect for the environment and people. This is why we are committed to working only with entities that demonstrate to be able to conduct their business responsibly in line with a number of international principles, including the **Universal Declaration of Human Rights**, the **United Nations Guiding Principles on Business and Human Rights** and the **Fundamental Conventions of the International Labour Organisation**.

WIIT's ESG Procurement Policy is structured around 5 main topics, for each of which we define our long-term commitment: Business ethics, Environmental sustainability, Protection of workers' rights, Protection of human rights and Conflict minerals. With reference to each topic, WIIT has identified the main criteria to be met, i.e. the specific aspects to which WIIT requires its suppliers to pay attention, evaluating possible improvement actions in the event of critical issues.

The WIIT Group undertakes to transmit this Policy to all suppliers for their signature.

SUPPLEMENTARY TOOLS

Together with the ESG Procurement Policy, WIIT has also adopted a Code of Ethics, a specific Suppliers Anti-Bribery Policy and a Risk Framework, which, in addition to their function, provide guidelines for a responsible supply chain management.

Code of Ethics

The Group's Code of Ethics constitutes the **set of principles of conduct that WIIT recognises, accepts and promotes in the performance of its activities**, both internally within the business structure and in relations with external parties. **The Code of Ethics contains a number of guidelines for managing relations with suppliers**, with whom internal procedures for selecting and managing business relations must be scrupulously observed. In particular, it is forbidden to preclude a supplier company that meets the requirements from competing for a supply contract by adopting objective and transparent evaluation criteria. The selection criteria for the awarding of contracts are subject to transparent goals and evaluations of quality, cost, innovation and the way the service is performed.

Suppliers Anti-Bribery Policy

The policy defines the rules of conduct applicable to external parties who are bound by contract to the Company (suppliers, consultants, agents, business brokers, intermediaries, etc.), in order to **ensure maximum transparency in the conduct of business and the strictest compliance with Italian and foreign anti-bribery legislation** (e.g. UK Bribery Act, USA F.C.P.A., Loi Sapin II France, etc.).

Risk Framework

In carrying out its activities, every company is exposed to risks and uncertainties that must be managed in order to mitigate potential negative impacts and seize opportunities wherever possible. In order to better monitor, manage and address the risks associated with the group's business activities, WIIT has decided to develop an Enterprise Risk Management system consistent with the complexity of the organisation and its development strategies. Furthermore, based on the "Corporate Governance Code for Listed Companies", the Parent Company has implemented **a risk management framework, the Risk Framework, which involves the entire organisation, establishing specific tasks for each body and figure involved**. Over the last few years, the risk inventory has been updated, taking into account the expansion of the Group's scope following the related acquisitions, the impacts of the Covid-19 pandemic and a more in-depth analysis of ESG - Environmental, Social and Governance - risks. These **include ESG risks on the supply chain, which are given an evaluation of risk potential and a timely mitigation strategy**.

THE WIIT GROUP SUPPLY CHAIN

In order to maintain a high degree of control over the quality of processes and services, the Group's business model envisages a limited recourse to third parties for the performance of its core activities and the provision of services to customers.

The Group's suppliers can be grouped into four categories:



Providers of networking and connectivity services

For network and connectivity services, WIIT uses routers and data lines from external providers, in order to offer end customers the necessary tools to connect to its Cloud services. WIIT selects the best operators on the market by offering high-tech telecommunication services and by the degree of network security and reliability. The selection of providers is based on the best commercial offer and on the service and quality levels guaranteed by the supplier. Service contracts have a multi-year duration - which varies according to the type of service offered - and establish the minimum service levels to be guaranteed by the provider.



Hardware and software suppliers

Hardware and software component suppliers are selected from amongst the market-leading companies that provide high quality solutions, in line with market evolutions and the respective commercial offers. Purchases are made on an aggregate basis, with a series of tenders each year, depending on the Group's needs and growth prospects.



Speciality service suppliers

For the selection of specialised services, suppliers are evaluated who provide services that are complementary to the Group's offer and that can support WIIT in guaranteeing the service to the end customer (e.g., intermediation with the Invoice Interchange System of the Inland Revenue, digitisation of tax documents), or that meet the needs of compliance (e.g., auditing), operation (e.g., tax consultancy), and continuous improvement of the company (e.g., training). The evaluation of the purchase of these services is based on compliance and business needs.



Electricity suppliers

In addition to these categories, given the nature of the services offered by the Group, the supply of electricity also plays an important role in our procurement choices. For this reason, WIIT is committed to reducing its atmospheric emissions as much as possible, with the goal of zero indirect CO₂ emissions by 2030, making a concrete contribution to the ecological and sustainable transition.

KEY TOPICS

BUSINESS ETHICS

Adopting an ethical and responsible procurement policy, choosing suppliers not involved in illegal actions, ensuring maximum transparency and security of the data they hold.

Anti-Money Laundering

WIIT does not get involved in any money laundering activities, nor does it help others to do so. The Group undertakes to sever relations with any supplier who is found to be involved in transactions of this nature.

Bribery

All suppliers, whether involved with the public or private sector, are obliged to comply with local anti-bribery laws and with the behavioural duties set out in detail in the WIIT Group's Anti-Bribery Policy for Suppliers, Consultants and Agents. This includes practices such as promising, giving or accepting anything of value in exchange for obtaining or providing unfair or inappropriate advantages, to anyone for any purpose.

Data security

Compliance with national and international data privacy laws is a prerequisite for working with WIIT. It is necessary that the Group's suppliers offer people all the rights related to the management of their personal data, processing it correctly and in accordance with the law, and providing access to it only to those who are authorised to do so.

ENVIRONMENTAL SUSTAINABILITY

Reducing the environmental impact throughout the supply chain, in order to generate long-term value by decreasing indirect emissions and pollution, protecting biodiversity, water resources and ensuring responsible waste management.

Energy consumption and greenhouse gas emissions

We encourage all our suppliers to improve the energy efficiency of their processes, minimising energy consumption, and to purchase greener energy, thereby decreasing their greenhouse gas emissions.

Pollution prevention

Suppliers must undertake to identify solutions in order to reduce air emissions, pollutant discharges and waste generation, where possible, by decreasing their environmental impact. In addition, WIIT demands that the use of natural resources be kept to a minimum, with the aim of preserving biodiversity.

Water management

Suppliers are required to commit to sustainable water management, avoiding waste, treating waste water disposal in the best possible way and developing water reuse solutions for business processes.

Management of waste and hazardous substances

Suppliers are required to manage, dispose of or recycle solid waste responsibly and to identify solutions to reduce waste assigned to landfill. In addition, WIIT demands effective management of the transport, storage and disposal of chemicals and hazardous substances that pose a threat to the environment and people.

PROTECTION OF WORKERS' RIGHTS

Ensuring the well-being, health, safety and respect for the rights of all workers involved in the Group's value chain, in order to foster the development of a more transparent and responsible labour market.

Health and safety

All our suppliers are committed to providing workers with a safe and healthy working environment. Furthermore, they are also encouraged to monitor the potential exposure of employees to risks to their safety and to identify, control and mitigate any critical issues through the design of appropriate solutions and preventive maintenance activities.

Working hours

WIIT expects suppliers to regularly check the working hours of their people, in order to ensure safety, health and well-being. Except in special or emergency situations, suppliers are urged to limit working hours to no more than 60 hours per week, including overtime, and each worker must be entitled to at least one day off per seven-day working period. In all circumstances, working hours must not exceed the maximum permitted by law.

Salaries

Suppliers must offer a remuneration that complies with the relevant legislation, including overtime pay and benefits, presenting employees with details of the basis on which they are paid on time.

Freedom of association

WIIT requires its suppliers to respect the right of workers to form and join organisations of their choice. Workers must not suffer retaliation for exercising their right to join or not join such legitimate groups in a non-violent way.

PROTECTION OF HUMAN RIGHTS

Ensuring respect for human rights in line with the guiding principles of the United Nations and the Global Compact, of which WIIT is a member and signatory.

Slavery and human trafficking

WIIT prohibits any practice of slavery and human trafficking. All parties with whom the Group conducts business must undertake not to engage in practices that violate people's freedoms in this respect. All workers must be free and able to terminate their employment or other work status at reasonable notice.

Child labour

WIIT rejects any practice of child labour within its supply chain. Suppliers are only required to employ people who are of the minimum age to work in the country where the activity is performed. The use of legitimate workplace apprenticeship or trainee programmes that comply with all laws and regulations and specific provisions for young workers is permitted and supported.

Respectful treatment

All employees must be treated with dignity and respect. Physical, verbal or psychological abuse or coercion, including threats of violence, corporal punishment, mental coercion, sexual harassment, must not be used or tolerated by our suppliers. Employees must be able to express their concerns or report misconduct without fear of retaliation, including through confidential interviews or dedicated whistleblowing channels.

Anti-discrimination

WIIT suppliers are required to ensure equality and equal opportunities in hiring and employment practices, such as applications, promotions, assignments, training, salaries, benefits, and dismissal, without discrimination on the basis of ethnicity, gender, sexual orientation, religion, disability, age, political opinion, or similar personal features.

CONFLICT MINERALS

Working with suppliers, Institutions and associations, in order to develop a responsible and conflict-free mineral procurement policy.

The European Union's Conflict Minerals Regulation requires EU-based importers of tin, tantalum, tungsten and gold (also referred to as "3TG") to ensure that their minerals are responsibly sourced and that their supply chains do not contribute to financing armed conflicts or other illegal practices.

Although the global supply chain for these minerals is very complex and layered, and tracing the origin of these minerals poses major obstacles, **WIIT is committed to requiring its suppliers not to source products made of minerals from potentially controversial Countries that use the proceeds of these raw materials to finance wars and conflicts.** In this regard, all Group Companies are committed to following the Organisation for economic cooperation and development (OECD) due diligence guidelines for minerals from conflict zones.



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