



WIIT

ESG PROCUREMENT POLICY

"A credible sustainability integration process cannot ignore the active management of environmental, economic and social aspects relevant to a company's value chain. WIIT's ESG Procurement Policy represents a fundamental step in the Group's growth path and, with this document, we formalise our commitment to contributing to the construction of a responsible supply chain that respects the environment and the people involved."

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WIIT S.p.A., a leader in the provision of cloud services for the management of critical applications, has been supporting companies in their digital transformation journey for over twenty years. In line with the process of integrating sustainability into its business model, the Group has defined an ESG Procurement Policy with the aim of consolidating its commitment to responsible and sustainable supply chain management.

The Policy identifies the guiding principles, priority issues, commitments and operational criteria that WIIT considers essential for generating sustainable value along its value chain, in line with the three ESG pillars: Environmental, Social and Governance.

The document is addressed to all suppliers of WIIT Group companies, who are required to read it, sign its contents and comply with its provisions, actively contributing to the construction of an ethical, transparent and sustainability-oriented supply chain.

KNOWLEDGE PARTNER

The European House-Ambrosetti

Find out more on the website: www.wiit.cloud

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INTRODUCTION

WIIT promotes responsible supply chain management to ensure that its products and services are offered in full compliance with Environmental, Social and Governance principles.

The aim of the ESG Procurement Policy is to describe WIIT's commitment to promoting constant and constructive dialogue with its suppliers in order to share the Group's values and integrate ESG principles into every stage of the value chain. Through this collaboration, WIIT intends to identify and manage the ESG issues most relevant to its supply chain, minimising environmental, social and governance impacts and contributing to the creation of sustainable value in the long term.

THE PRINCIPLES UNDERPINNING A RESPONSIBLE SUPPLY CHAIN

A Group such as WIIT, committed to integrating sustainability into its business model in an increasingly structured manner, recognises the importance of considering and managing the impacts generated by its supply chain.

Aware that procurement choices can significantly influence the entire value chain, WIIT is committed to applying ESG criteria in the selection, management and monitoring of suppliers, promoting a responsible supply chain that is aligned with its values.

The goal is to minimise negative externalities along the value chain and generate positive and measurable impacts for the environment, people and communities involved.

Transparency	Responsibility	Improvement
We guarantee maximum transparency in the selection and evaluation processes of our suppliers.	We make our choices aware of the responsibility we have throughout the Group's value chain	We involve our suppliers in continuous improvement processes to promote best market practices

WIIT establishes solid partnerships with its suppliers, based on a shared commitment to operating ethically and with respect for the environment and people. For this reason, we are committed, where possible, to working exclusively with entities that demonstrate that they conduct their activities responsibly, in accordance with recognised 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 based on three ESG pillars, each of which guides our long-term commitments: **Environmental (E)**, **Social (S)** and **Governance (G)**.

For each ESG theme, WIIT has defined the main criteria to be met, identifying the specific aspects to which suppliers are required to pay particular attention. These criteria constitute the guidelines for ensuring responsible and sustainable behaviour throughout the entire supply chain. Furthermore, WIIT is committed to constantly monitoring suppliers' compliance with these requirements, promoting corrective actions and continuous improvement initiatives should any critical issues arise, with the aim of consolidating an ethical, transparent and long-term sustainability-oriented supply chain.

INTEGRATIVE TOOLS

Along with the ESG Procurement Policy, WIIT has adopted a Code of Ethics, a specific anti-corruption policy for suppliers and a Risk Framework which, in addition to their function, offer guidelines for responsible supply chain management.

Code of Ethics

The Group's Code of Ethics represents the set of principles of conduct that WIIT recognises, accepts and promotes in the conduct of its activities, both within the organisation and in its relations with external parties.

The document provides guidelines for managing relations with suppliers, imposing strict compliance with internal selection and commercial management procedures.

In particular, it is forbidden to hinder the possibility of a supplier company, in possession of the required requirements, from participating in tenders for the award of supplies. Selection is based on objective and transparent criteria, based on assessments of quality, cost, innovation and service delivery methods.

Supplier Anti-Corruption Policy

The policy defines the rules of conduct applicable to external parties who have contractual relationships with the Company (suppliers, consultants, agents, intermediaries, etc.), in order to ensure maximum transparency in the conduct of business and compliance with Italian and international anti-corruption regulations (e.g. UK Bribery Act, USA F.C.P.A., Loi Sapin II France).

Risk Framework

Every company is exposed to risks and uncertainties that must be managed in order to mitigate potential negative impacts and seize opportunities.

WIIT has developed an Enterprise Risk Management system consistent with the complexity of the organisation and its development strategies. In line with the Corporate Governance Code for Listed Companies, the Parent Company has implemented a risk management framework that involves the entire organisation, assigning specific tasks to each body and function.

In recent years, the risk inventory has been updated to include new threats, such as the Covid-19 pandemic, and to integrate ESG (Environmental, Social and Governance) analysis. For each ESG risk identified, a potential assessment and a specific mitigation strategy are carried out.

THE WIIT GROUP SUPPLY CHAIN

To ensure a high level of quality in processes and services, the Group's business model involves limited use of external suppliers for strategic activities and the provision of services to customers. Supply chain management is inspired by ESG principles, ensuring that every choice is consistent with criteria of environmental sustainability, social responsibility and transparency in governance.

The Group's suppliers are classified into four main categories:

Network and Connectivity Service Providers

WIIT uses external providers to supply routers and data lines, ensuring end customers have the connectivity they need to access Cloud services. The selected providers offer advanced technological solutions and ensure high levels of network security and reliability. Service contracts, which are generally multi-year, define minimum levels of quality and operational continuity.

WIIT promotes practices consistent with ESG principles:

- **Environmental:** favouring digital solutions and low-energy infrastructure.
- **Social:** supporting initiatives that protect workers and promote skills development.

- **Governance:** ensuring transparency, regulatory compliance and reliability in processes.

Hardware and Software Suppliers

WIIT collaborates with market-leading suppliers for the purchase of hardware and software components, ensuring high-quality solutions in line with technological developments. Purchases are made on an aggregate basis, through periodic tenders, according to the Group's needs and growth prospects.

WIIT promotes practices consistent with ESG principles:

- **Environmental:** promoting solutions that reduce environmental impact and encourage component recycling.
- **Social:** supporting initiatives for worker protection and social responsibility throughout the supply chain.
- **Governance:** ensuring transparency, regulatory compliance and process traceability.

Specialist Service Providers

WIIT uses suppliers that offer services complementary to the Group's offering, helping to ensure the quality and continuity of service to the end customer. These include activities such as intermediation with the Italian Revenue Agency's invoice exchange system, the digitisation of tax documents, auditing, tax consulting and training.

In its collaboration with these partners, WIIT promotes practices consistent with ESG principles:

- **Environmental:** favouring digital solutions that reduce resource use and environmental impact.
- **Social:** supporting initiatives that protect workers and promote skills development.
- **Governance:** ensuring transparency, regulatory compliance and reliability in processes.

These services are essential for ensuring compliance, operational efficiency and continuous business improvement.

Electricity Suppliers

The supply of electricity is a strategic element for the Group, closely linked to the nature of the services provided. WIIT recognises the significant impact of energy consumption on its performance and integrates ESG principles into its procurement decisions.

- **Environmental:** progressively reducing atmospheric emissions through technological and management solutions geared towards energy efficiency, with the aim of eliminating indirect CO₂ emissions by 2030 through the exclusive use of energy from renewable and certified sources.
- **Social:** contributing to the sustainable transition by promoting a responsible energy supply chain that protects the people involved and encourages ethical practices throughout the supply chain.
- **Governance:** ensuring transparency and regulatory compliance in the management of supply contracts, ensuring that choices are consistent with global decarbonisation objectives and internal sustainability policies.

In this way, energy management becomes a pillar of WIIT's ESG strategy, reinforcing its commitment to a low-emission future and sustainable growth.

RESPONSIBLE PROCUREMENT POLICY

Adopting a responsible procurement policy means integrating ESG principles into every purchasing decision, selecting suppliers who demonstrate a concrete and verifiable commitment to sustainability.

Priority areas include:

- **Environmental:** use of energy from renewable sources, emission reduction policies and sustainable waste management.
- **Social:** protection of workers' rights, workplace safety, training programmes and initiatives for diversity and inclusion.
- **Governance (Transparency and Compliance):** adoption of codes of ethics, quality and safety certifications, process traceability and compliance with international regulations.

These requirements, which can be verified through specific questions during the qualification phase, enable the creation of an ethical, transparent supply chain geared towards sustainable value creation.

The ESG criteria used to evaluate suppliers are listed below¹:

ESG – General

- Have you prepared an ESG report or sustainability statement?
- Do you have a formalised sustainability policy/strategy?
- Is there a committee or function dedicated to sustainability?
- Have you defined ESG objectives with time targets?
- *Indicate the main ESG objectives with a time frame.*
- Does the company carry out a periodic assessment of ESG risks?

E – Environmental

- Does the company have an environmental management system?
- Does the company monitor its annual energy consumption (kWh)?
- Does the company have additional environmental certifications (e.g. EMAS, Ecolabel, etc.)?
- *Percentage of energy from renewable sources out of the total (%)*
- *Scope 1 emissions (t CO₂e)*
- *Scope 2 emissions (t CO₂e)*
- *Scope 3 emissions (t CO₂e)*
- *Percentage of electric/plug-in cars in the entire company car fleet (%)*

S – Social

- Does the company have a corporate policy on workers' rights/welfare?
- Does the company have defined gender equality objectives?
- Does the company have a Code of Ethics / Code of Conduct?
- Does the company provide mandatory annual training (e.g. safety, compliance, technical skills)?
- Does the company have social certifications (e.g. SA8000, UNI/PdR 125 gender equality)?
- Does the company have an active whistleblowing channel?
- *Percentage of permanent contracts (%)*

¹ Optional or conditional criteria are shown in italics.

- *Percentage of female employees (%)*

G – Governance

- Does the organisation have an Organisational Model 231?
- Does the company have anti-corruption and anti-money laundering policies?
- Does the company carry out ESG assessments on its suppliers?
- Does the company carry out periodic audits on its supply chain?
- Has the company defined ESG improvement objectives at the governance level?
- Is the Board of Directors formally involved in overseeing ESG/sustainability issues?
- Does variable management remuneration (MBO) include ESG objectives?
- Does the company have an ESG risk map/integrated enterprise risk management system?

CONFLICT MINERALS

The **Conflict Minerals Regulation** requires importers of tin, tantalum, tungsten and gold (3TG) based in the EU to ensure that these minerals are sourced responsibly and that their supply chains do not contribute to the financing of armed conflict or illegal practices.

WIIT recognises the complexity of the global supply chain for these minerals and the difficulties in tracking them, but is committed to working with suppliers who adhere to strict standards of responsibility. In particular, the Group requires that products do not come from countries or geographical areas involved in conflicts, where revenues from raw materials could be used to finance wars or human rights violations.

WIIT integrates ESG principles in this area:

- **Environmental:** promoting extraction and production practices that reduce environmental impact and favour the use of sustainable resources.
- **Social:** ensuring that the supply chain is not involved in human rights violations, labour exploitation or conflict financing.
- **Governance:** requiring transparency and compliance with OECD guidelines for due diligence on minerals from conflict zones, ensuring traceability and accountability throughout the supply chain.

This approach allows suppliers to be monitored through documentary evidence and declarations of compliance, reinforcing the Group's commitment to an ethical and sustainable supply chain.

BUSINESS ETHICS

In addition to the above, WIIT adopts an ethical and responsible procurement policy, committing to working exclusively with suppliers who operate in compliance with the law and principles of integrity. This means ensuring transparency at every stage of the commercial relationship and maximum security in data management.

Anti-money laundering

WIIT does not participate in or promote any money laundering activities. The Group reserves the right to immediately terminate its relationship with any supplier involved in operations of this nature.

Corruption

All suppliers, regardless of whether they are in the public or private sector, must comply with local and international anti-corruption regulations, as well as the principles established by **the Anti-Corruption**

Policy for suppliers, consultants and agents of the WIIT Group. It is forbidden to promise, offer or accept any illicit or inappropriate advantage in order to obtain undue benefits.

Data Security

Compliance with national and international laws on the protection of personal data is an essential requirement for working with WIIT. Suppliers must ensure the proper management of data, ensuring that it is processed in accordance with current regulations and accessible only to authorised personnel.