



## **FiberCop's commitment to Environmental Sustainability**

### **Institutional Environmental Policy**

#### **1. INTRODUCTION**

FiberCop, as the country's leading infrastructure operator, is driving the transformation and acceleration of fiber optic network deployment, ensuring accessibility for all telecommunications and media operators. By promoting digital inclusion, FiberCop contributes to the country's economic development, enabling businesses and institutions to stay digitally connected, with a positive impact on the environment and the quality of life of people.

This policy outlines the management of environmental aspects, including related impacts, risks, and opportunities identified as priorities following double materiality assessments conducted both internally and with external stakeholders—primarily telecommunications and media operators, the value chain, and national and local institutions.

#### **2. RECIPIENTS**

The environmental policy applies to FiberCop, including its value chain, to which FiberCop conveys and communicates the policy's principles to foster a shared approach and translate them into joint actions towards common goals and targets. The policy is addressed to FiberCop's operational structures and corporate departments.

#### **3. PURPOSE AND SCOPE**

This document provides clear guidelines for responsible and sustainable management of the environment and the ecosystem, translating into practices aimed at:

- Minimizing negative impacts on water, air, and soil through periodic checks on assets to manage risks related to fuel spills, ozone-depleting substance leaks, and asbestos presence. Proper maintenance and preventive measures are implemented in line with regulatory frameworks and internal intervention plans, also including remediation actions targeted and proportionate to the damage. Responsibilities for prevention, maintenance, and remediation plans are clearly defined and assigned.
- Mitigating and adapting to climate change by managing both physical climate risks of the company and transition risks related to the adaptation of climate change. This includes implementing an energy transition plan to support CO2 emission reduction targets for FiberCop and its value chain. Science-based targets will have different time horizons when necessary to ensure their effective and lasting implementation.
- Optimizing activities based on circular usage models, recovery of circular value, and alignment with circular economy following the nine "R" principles: Refuse, Rethink, Reduce, Reuse, Repair, Refurbish, Remanufacture, Repurpose, and Recycle. Decommissioning plans of obsolete equipment follows circular decommissioning principles through agreements with interested parties.
- Protecting biodiversity and ecosystems in full compliance with local and national legislation. FiberCop extends this commitment to its value chain through targeted communication, monitoring, and appropriate supplier selection.



FiberCop's environmental policy is supported by procedures and management processes implemented by the relevant departments and is tied to local legislation and international standards, requiring also the development of specific training and communication programs on environmental issues.

#### 4. FIBERCop'S STRATEGIC ROLE AND APPROACH

FiberCop, aware of its strategic role and of the importance of its operations, is committed to creating value for stakeholders by reconciling its mission and business with global sustainability goals. The company ensures:

- An increasingly reliable, secure, resilient, and fast network connection through innovative technologies and sustainable practices, minimizing its environmental impact in collaboration with local communities and its value chain.
- The pursuit of efficient resource management, emission reduction, and a sustainable value chain, contributing to the United Nations Sustainable Development Goals (SDGs) and respecting human rights, which are an essential prerequisite of any company operations.

In particular, FiberCop aims to implement policies, initiatives and behaviors consistent with the following objectives, among others:

- Goal 7.2: Significantly increase the share of renewable energy in total energy consumption by 2030.
- Goal 9: Industry, Innovation and Infrastructure. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation.
- Goal 11: Sustainable cities and communities. Make cities and human settlements inclusive, safe, resilient, and sustainable.
- Goal 12.6: Encourage companies, particularly large and multinational enterprises, to adopt sustainable practices and integrate sustainability information into their annual reports.
- Goal 13: Fight against the climate change. Take urgent action to fight climate change and its impacts.

FiberCop strongly believes that actions to protect the environment and ecosystem are concrete opportunities able to generate long-term value in terms of efficiency and with economic and reputational positive effects. Therefore, it consolidates its operations through:

- identification of the environmental risks that arise from its operations, in addition to the physical and transitional risks arising from the context in which it operates.
- verification that each supervised theme is governed by a specific internal regulatory framework, that each theme is equipped with management systems for tracking and monitoring performance through appropriate indicators, and that the relevant responsibilities have been identified.
- definition of a progressive improvement plan that is shared and communicated periodically to stakeholders.
- mitigation of climate change through an energy transition plan and reduction of greenhouse gas emissions, consistent with the long-term Net Zero target and with positive impacts on indirect emissions from all network users.

- adaptation to climate change through redundancy and resilience of company's network, with appropriate location of company assets, and prevention of climate-related risks for company's workforce.

Aware of the increasing impacts of climate change and human operations on ecosystems, and monitoring the risks associated with these impacts, FiberCop is committed to achieve Net Zero in line with scientific evidence and Science Based Target (SBTi) guidelines by 2040 for its direct operations, and by 2050 across its entire value chain, as detailed in its Industrial Plan.

The resulting environmental strategy is based on the following guidance:

- network deployment guided by principles of energy efficiency and the respect of the environment and ecosystems. Furthermore, the progressive replacement of fiber in place of copper has a positive impact in terms of environmental sustainability: greater energy efficiency in its use and in its production significantly lowers CO2 emissions compared to the production and use of copper wires. Even from the point of view of human health, the impact is positive: fiber is in fact made up of non-harmful silicon.
- reducing greenhouse gas emissions, including those from the value chain, towards a gradual shift away from fossil fuels to renewable sources.
- disposal of high-emission network equipment and policies for the purchasing of goods and services guided by principles of circular economy and energy efficiency.

Finally, as also explained in FiberCop's Energy Policy, the company details the environmental principles set out above in its procedures, practices and on its sites also through appropriate certifications.

Promotes energy efficiency in all activities through the energy management systems implementation compliant with the related standards and regulations in order to identify improvements opportunities and to accurately monitor energy consumptions.

## **5. FIBERCop'S COMMITMENTS**

FiberCop recognises the importance of identifying and assessing all impacts, positive and negative, current and potential, of its own operations and value chain resulting from climate change and having an impact on the environment and ecosystems. Identifies and seizes relevant opportunities for environmental and ecosystem which can also have positive impacts on the well-being and health of its workforce, on its operations and on its business, also with positive reputational aspects, as well as on the entire value chain including the workers involved in it.

Committed to minimizing the environmental footprint of its operations and of its value chain and stakeholders in general, FiberCop details within its own operations the present Environmental Policy, with particular attention to:

- Ensuring full compliance with environmental laws and regulations, aiming for continuous improvement beyond legal requirements where possible in an evolutionary perspective.
- Adopting environmental management systems and procedures that promote resource efficiency, transition to a circular economy, and minimization of natural resource consumption.
- Setting sub-targets to achieve broader sustainability targets, involving all relevant corporate departments.

- Monitoring performance through specific indicators, assessing the effectiveness of actions, and implementing actions to improve the performance where necessary.
- Contribute, on its own behalf and within its role, to the fight against climate change, by helping to achieve defined goals at national and international level, through decisions aimed at:
  - Embedding environmental target into the industrial plan and executive remuneration policies, so as to achieve a business model that integrates sustainability, governance, and finance.
  - Enabling dematerialization and emissions reduction across other industries and communities, through FiberCop's resilient and widespread infrastructure.
  - Promoting a strong environmental culture internally and externally.
- Consciously select the company's value chain by giving importance to environmental sustainability characteristics throughout the entire life cycle of products/services purchased.
- Include environmental sustainability criteria in the assessment of potential mergers and acquisitions.
- Prevent and mitigate air, water, soil and noise pollution.
- Manage waste generated by its operations in a way that gives priority to re-use, recycling and repair of objects and materials, while minimizing the use of hazardous substances.
- Consider environmental sustainability aspects in new infrastructure and service development projects, with a particular focus on biodiversity protection.
- Communicate in a transparent and systematic way to its stakeholders all information about its environmental performance, also verified by external and independent parties when required.
- Communicate and explain to workers - through specific training programs and initiatives - the social and economic value of environmental sustainability and FiberCop's initiatives and actions designed to implement the principles of its policies, in a way that makes them an integral part of its operations.
- Ensure that adequate financial and non-financial resources are available to implement the actions planned by this policy, defining the perimeters of intervention, the management and the control of these resources.

The environmental policy's principles and guidelines are communicated to employees, the value chain, customers, and all stakeholders through the company's institutional communication channels.

This document has been disclosed for information to the Board of Directors on February 25, 2025.