

Sustainability Statement 2025



FiberCop's Sustainability Statement for 2025 is prepared on a voluntary basis in accordance with the European Sustainability Reporting Standards issued by the European Commission and is subject to limited independent third-party review. The document is also in line with the guidance of the Task Force on Climate-Related Financial Disclosure. The Group's Sustainability Statement for the first time demonstrates a clear and internally shared vision: building the Network of the future for the country generates lasting

value for citizens, businesses, and territories. In these pages, FiberCop shares its core values made of awareness of its role, clear guidelines, and actions that, starting today, support the development of a long-term company. The Sustainability Statement aims to illustrate FiberCop's profile through qualitative and quantitative information on environmental, social, and governance issues, ensuring transparency for stakeholders and opening up to dialogue and listening essential to continuing to create value.



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General Disclosures

General Disclosures

ESRS 2

BP-1

General basis for preparation of sustainability statements

FiberCop's 2025 Sustainability Statement, drafted on a voluntary basis, **5a,bi** is conducted on an individual basis and presents data and information referring to FiberCop as in the 2025 Annual Financial Report. **5d** The Company does not omit any information relating to intellectual property, know-how or innovation results: such information is reported in the R&D section of the management report, which should be consulted also regarding imminent developments or matters currently under negotiation. **5e** FiberCop shall not omit information regarding upcoming developments or matters under negotiation, in accordance with Article 19a (3) and Article 29a (3) of Directive 2013/34/EU.

The 2025 Statement complies with the same deadlines as FiberCop's Financial Report and reports on the period 1 January - 31 December 2025. For any information relating to the document, please contact the following e-mail address sustainability@fibercop.com.

The Statement is prepared in accordance with



the European Sustainability Reporting Standards (ESRS), in application of the principles set out by the European Financial Reporting Advisory Group (EFRAG).

5c Information presented in the Statement reflect the results of the double materiality analysis, i.e. the impacts, risks and opportunities (IROs) that emerged as significant. The IRO analysis and the objectives cover FiberCop's value chain with the clarification that the impacts relating to child and/or forced labour have been analysed only for the activities carried out in Italy, the only country in which the Company operates.

In terms of internal control of the contents presented in the Statement, FiberCop has set up a system, implemented on a digital platform, aimed at collecting, verifying and internally approving all the departmental content of the document.

BP-2 Disclosures in relation to specific circumstances

9 The time horizons coincide with the requirements of ESRS 1. **10** This document does not include metrics that include value chain data estimated on the basis of indirect sources.

10d Within the perimeter of the Scope 3 emissions calculation, FiberCop aims to monitor and reduce greenhouse gas emissions throughout the supply chain by actively involving suppliers through the Building Network program, presented in November 2025, as detailed hereafter.

During 2025, a more detailed mapping of the supply chain was carried out, identifying the most relevant supplier companies based on the order (opex and capex) and their environmental impact. Given the recent establishment of the current FiberCop (1 July 2024), the results of engagement activities for the reduction of the carbon footprint along the entire value chain will have their full effect in the plan years.

11a,b Any possible causes of uncertainty relating to quantitative metrics and/or monetary amounts presented in the Statement are explained in detail in the relevant sections. As an example, any temporal uncertainty on the entry into operations, in the years of the plan, of EnerCop's plants¹ to produce solar energy functional to FiberCop's decarbonization plan, is reported in the ESRS E1-6 section.

Scope 3 greenhouse gas emission information is subject to more inherent limitations than Scope 1 and 2, due to the limited availability and relative accuracy of the data used to define this information, both quantitative and qualitative, relating to the value chain.

For the purpose of reporting prospective information in accordance with ESRS, the processing of such information is carried out on the basis of assumptions, described in the Sustainability Statement, regarding events that may occur in the future and possible future actions by the Company.

¹HoldCo Group Companies <https://www.enercop.com/chi-siamo/>

Due to the uncertainty associated with the realization of any future event, both in terms of the actual occurrence and the extent and timing of the event, the deviations between the final data and the prospective information could be significant.

13 Data reported concern 2025, the first full year of activity of the Company, without comparisons with 2024, a year that is not fully significant given the recent establishment of the current structure of FiberCop (1 July 2024). FiberCop reports on two entity-specific indicators, relevant in consideration of the actions taken to contain risks considered significant. The document incorporates data required by the Task Force on Climate-related Financial Disclosures (TCFD), the latter identifiable in the document with the symbol <T>.

<T>GOV-1

The role of the administrative, management and supervisory bodies

FiberCop's Governance system is composed of the Board of Directors (BoD) and the Board of Statutory Auditors (CS). The Board of Directors, chaired by the Chairman/Chief Executive Officer, has the broadest powers for the ordinary and extraordinary management of the Company, while the CS performs the function of the Company's Supervisory Body.

In 2025, management powers have been entrusted to the Chairman/Chief Executive Officer, while the other Directors are non-executive.

21a As of 31 December 2025, there are 14 members of the Board of Directors (including the CEO), while there are 3 members of the FiberCop's Board of Statutory Auditors; two women are present: one on the BoD and one as President of the CS.



21d Out of the total of 17, women represent 12%, one present on the Board of Directors and the other President of the Board of Statutory Auditors; in particular, the ratio of women to men is 13.3%.² More details in the table below.

21b,e There are no independent members or employee representatives. On 31 December 2025 there were no Board Committees present. **21c** Members of the Board of Directors are professionals aged between 35 and 60, with international standing, highly specialized and operating in structured contexts in which attention to sustainability issues is consolidated. They regularly discuss these issues with highly competent interlocutors. The members of

the Board, all multilingual, have skills in the following areas: finance, strategic planning, risk management, business and risk audit, as well as knowledge of governmental, public and institutional relations. The Board of Directors receives regular training and updates on the sustainability issues most relevant to the organization. During the year, specific training sessions were held on the regulatory changes introduced by the Corporate Sustainability Reporting Directive (CSRD), with in-depth analysis of the new provisions by the European Directive. These activities strengthened the skills of the members of the Board of Directors in assessing the impacts, risks and opportunities related to sustainability. The Board of Directors also approves the Company's sustainability strategy and ESG objectives, verifying their coherence with FiberCop's strategic guidelines. It supervises the double materiality analysis process and periodically monitors the main ESG performance indicators, ensuring the integration of sustainability risks and opportunities into the Enterprise Risk Management system (ERM). The members of the Board of Statutory Auditors, aged between 50 and 60, have extensive experience in sustainability issues and have expertise in the ESG field. They also possess in-depth knowledge of financial statements, finance and governance

and work to support the Company in overseeing, monitoring and developing ESG issues. The Board of Statutory Auditors monitors the reliability of the internal control and risk management system with reference to ESG data and verifies compliance with the applicable regulatory provisions on sustainability reporting, ensuring that the Sustainability Statement includes information relating to the impact of corporate activities on the environment, people and governance, as well as the ways in which the risks and opportunities arising from sustainability issues can affect the economic and financial performance of the Company. The Board of Statutory Auditors supervises the adequacy of the Company's organisational, administrative and accounting structure, including, therefore, the safeguards relating to sustainability reporting.

FiberCop adopts a management model based on articulated governance and supported by a structured system of managerial committees, each with specific responsibilities to oversee the main strategic, operational and sustainability areas of the Company. These committees ensure coordinated, transparent and risk-oriented decision-making, ensuring the involvement of key departments and continuous monitoring of activities critical to business management.

MEMBERS OF ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

Members of administrative, management and supervisory bodies	u.m.	Women	Men	Not communicated	Total
Total number of executive members (21st)	n	0	1	0	1
Total number of non-executive members (21st)	n	2	14	0	16
Total number of members of administrative, management and supervisory bodies	n	2	15	0	17
Gender distribution of members of the board of directors, management and control (21d)	%	12	88	0	100

² Calculation made considering the number of women compared to the number of men.

MANAGERIAL COMMITTEES

	Mandate	Chairman	Composition
Management Committee	The Chairman and Chief Executive Officer avails himself of the Management Committee as an advisory body to support him	Chief Corporate Officer	Chief Strategy Officer - Chief Revenue & Data Officer - Chief Financial Officer - Commercial Counsel - Chief Technology & Operations Officer
Ethics Compliance Committee	Strengthen the corporate culture based on ethics, integrity and compliance with regulations in order to enhance accountability and transparency in the work environment	Chief Compliance Officer	Chief Internal Audit Officer - General Counsel - Chief Human Resources Officer
Crisis Management Committee	Establish strategies for managing critical events or major events, in order to react quickly and effectively to emergencies	Chairman/Chief Executive Officer	Chief Security Officer - Chief Corporate Officer - Chief Financial Officer - Chief Human Resources Officer - General Counsel - Chief Strategy Officer - Chief Information Technology Officer - Chief Technology & Operations Officer - Chief External Relations Officer - Chief Regulatory Affairs Officer - Chief Revenue & Data Officer
Global Risk Committee	Monitor and support ERM activities	Chief Financial Officer	Chief Strategy Officer - Chief Revenue & Data Officer - Chief Technology & Operations Officer - Chief Corporate Officer - Chief Compliance Officer - Chief Security Officer - Chief Internal Audit Officer - General Counsel
Steering Committee Gender Equality	Address issues related to inclusion, gender equality and integration	Chairman/Chief Executive Officer	Chief Human Resources Officer - Chief Financial Officer - Chief Corporate Officer - Human Resources Office/PMO & Change - Human Resources Office/FiberCop Academy - Human Resources Office/PMO & Change/ Diversity & Inclusion Manager
Steering Committee Innovation	Promote innovation as a strategic lever of the Company's development plan	Head of Technology & Innovation within Chief Technology & Operation Officer	Chairman and Chief Executive Office - Chief Technology & Operations Office - Chief Revenue & Data Officer - Chief Strategy Officer - Chief Corporate Officer - Chief Information Technology Officer
Supplier Risk Committee	Strengthen control over risks related to the supply chain process through the adaptation of the relevant procedural set, the evaluation and approval of negotiations with suppliers of goods and services, as well as the monitoring of mitigation actions, as defined in the Transitional Supplier Risk Policy	Chief Compliance Officer	Chief Financial Officer - General Counsel - Chief Strategy Officer - Chief Corporate Officer - Chief Technology & Operations Officer - Chief Revenue & Data Officer - Chief Security Officer
Steering Committee Safety	Ensure the definition of Health & Safety strategic objectives and oversee the vertical action plans of the individual employer lines and transversal actions	Chief Corporate Officer	Head of HSE (coordination) - Chief Technology & Operations Officer (Employer) - Chief Compliance Officer - Chief Internal Audit Officer - Chief Regulatory Affairs Officer - Chief Security Officer - General Counsel - Chief External Relations Officer - Chief Human Resources Officer - Chief Financial Officer - Chief Strategy Officer - Chief Revenue & Data Officer - Chief Information Technology Officer - Head of Real Estate - Head of Procurement

22a,b,ci,cii The Chairman/Chief Executive Officer of FiberCop avails himself of the Management Committee, an advisory body of which the Chief Corporate Officer is a member; the latter head of the structure responsible for the integrated management of operating activities and for the coordination of the corporate sustainability plan. In this context, the Management Committee plays a central role in monitoring the progress of the ESG targets - analysed monthly through ad hoc managerial reporting - and in disseminating the culture of sustainability through training initiatives aimed at corporate leadership. Alongside these responsibilities, the Management Committee actively participates in engagement processes and double materiality analyses, helping to ensure that material impacts, risks and opportunities are continuously integrated into the corporate strategy. To support this articulated governance, various thematic committees operate, each dedicated to a specific area of oversight and control: the Supplier Risk Committee, the Ethics Compliance Committee, the Crisis Management Committee, the Gender Equality Steering Committee, the Global Risk Committee, the Safety Steering Committee and the Innovation Steering Committee. These bodies play a key role in intercepting and managing emerging risks, ensuring regulatory compliance and promoting a proactive approach to sustainability, contributing synergistically to strengthening

FiberCop's governance model. The table shows the mandate and the composition, represented through the departments involved. It should be noted that the Sustainability department resides within the Chief Corporate Officer department.

The Committees work in an integrated way, contributing to:

- strengthen risk monitoring along the entire value chain (e.g. supply chain, health and safety, business continuity);
- monitor strategic and ESG KPIs, on a monthly basis, to support solid and data-driven governance;
- ensure consistency between industrial objectives, sustainability plan and operational management.

Thanks to the presence of these committees, FiberCop ensures a multidisciplinary, responsible and proactive management model, based on specific expertise and capable of integrating industrial strategy, sustainability, risk control and stakeholder value.

More specifically, the Sustainability department is responsible for the governance of sustainability and ESG objectives within FiberCop's strategic guidelines, starting from the analysis of significant impacts, risks and opportunities, identifying and coordinating sustainability projects and actions.

The department is also responsible for preparing

the Sustainability Statement and overseeing ESG indices and ratings.

22ciii FiberCop is preparing an appropriate sustainability policy that formalizes the cross-departmental sharing and management of impacts, risks and opportunities. The policy guarantees periodic surveys of ESG information on relevant IROs in order to strengthen ESG governance with positive effects on operational efficiency, transparency and ESG culture which also benefit FiberCop's reputation and competitiveness.

The management of material impacts is delegated to specific management positions depending on the nature of the impact. As regards the corporate risk profile, which derives directly from the ERM model, it is approved by the Global Risk Committee and illustrated to the Board of Directors. FiberCop has adopted a constantly evolving ERM model aligned with international regulations and standards (e.g. COSO Framework and ISO 31000). The objective of the ERM model is to identify, assess and monitor risks that may compromise the achievement of corporate objectives, including those of an ESG nature. The enterprise risk identification process is an integral part of the corporate governance and control system and represents a key tool to support the decision-making process and the continuity/sustainability of the business.

In this process, emerging risks are also considered,

i.e. themes on which evolution elements persist that could affect the broader risk profile of the Company. The risk identification process is divided into the following phases: Preliminary Analysis, Risk Identification, Risk Measurement & Prioritisation, Risk Response and Risk Monitoring & Reporting.

22d The results of the analysis of the relevant IROs contribute to the definition of the targets of the sustainability plan – which is part of FiberCop’s strategic guidelines – and the completion of projects and actions of the Sustainability department. As already mentioned, during the year, the Board of Directors, through the management report, monitors the progress of the main ESG targets on a monthly basis, and, thanks to this continuous reporting mechanism, a structured decision-making process is developed on ESG issues that are the responsibility of the Chief Corporate Officer. During 2025, the Management Committee met weekly; the Board of Directors met 13 times.

23a,b The Management Committee makes use, through the Chief Corporate Officer, of the expertise of the Sustainability department as well as reports from external experts on specific topics. During 2025, in-depth studies on decarbonisation plans, biodiversity and impact analyses were launched, also with the support of experts from outside the Company. For the Board of Directors, please refer to GOV-1 21c. In 2025 the Management

Committee analysed in depth the following aspects:

- the proposal to study and approve FiberCop’s Net Zero decarbonization plan and to obtain its validation by SBTi, validation obtained by FiberCop in July;
- the engagement of the supply chain on environmental, social and governance issues also through the definition of a Supplier Code of Conduct, presented during a supply chain engagement event held in November;
- the monthly monitoring of ESG objectives.

↳ **GOV-2**

Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies

26a,b,c The Board of Directors is systematically informed about the main ESG indicators, including the trend in consumption and climate-altering emissions, the gender gap and injuries related to FiberCop personnel and the supply chain with a focus on the main network companies, also through a detailed document on numbers, known as the management report. The sustainability plan is an integral and substantial part of FiberCop’s strategic guidelines submitted for approval to the Board

of Directors. On several occasions, the Company organizes informative events for the benefit of the corporate bodies that also have ESG issues as their subject. In FiberCop, both the operative structures and the decision-making bodies therefore have constant visibility on sustainability issues, in order to operate according to a scheme of constant and continuous improvement of commitment and positioning on the subject. Impacts, risks and opportunities resulting from the analyses conducted for the double impact matrix and the related identification process were shared with the Board of Directors on 30 January 2026; a presentation to the Management Committee took place the previous week.

The Risk Management department, through its ERM oversight, has responsibility for the corporate risk management process, supporting Top Management in the risk-based decision-making process and contributing to the sustainability of the business. It ensures reporting to the control bodies and Top Management regarding the evolution of the risk profile and ensures consistency in the risk governance system. The 2025 risk analysis was shared with the Global Risk Committee and was presented to the Board of Directors in November.

As an example, during 2025, (in)formation sessions were provided by the Sustainability department to

the members of the Board of Directors and to the first deputies of the Chairman/CEO on occasion of the approval of the Environmental Policy (February 2025) and the Human Rights Policy (July 2025) as well as the Supplier Code of Conduct shared with the entire Top Management and with the Chairman/CEO. For the list of impacts, risks and opportunities relevant to FiberCop, please refer to ESRS 2 SBM-3. During 2025, the first supply chain engagement event was held, which was also attended by Top Management, involving over 290 suppliers, with a focus on ESG and sustainability reporting issues: during the event, evidence of FiberCop's decarbonization plan, the first project streams of the ESG plan, the Supplier Code of Conduct and collection of some evidence for the 2025 impact matrix were presented.

This report was presented to the Board of Directors on 25 March 2026, in conjunction with the Financial Reporting.

GOV-3 Integration of sustainability-related performance in incentive schemes

29a,b,c,e During 2025, no incentive systems and remuneration policies related to sustainability issues were implemented for the members of the Board of Directors and the Board of Statutory Auditors of FiberCop.

The 2025 Management by Objectives (MBO) incentive system applies to C-level executives and managers of the Company (all full-time employees) and the CEO, representing approximately 2% of the workforce. The scheme focuses on objectives addressing issues that impact people, the Country and the environment, which are core components of FiberCop's strategic guidelines and consistent with its role in developing an innovative, widespread and sustainable digital infrastructure.

The 2025 MBO includes, among others, specific ESG-related targets linked to the decarbonization plan and the reduction of workplace injuries. These indicators account for 7.5% of the scorecard for the Chairman/CEO and C-level executives and between 4.5% and 6% for other managers. Also for 2026, the weighting will vary depending on the reference population; the specific ESG-linked targets will be discussed by the BoD during the year.

29e The MBO system is approved by the Board of Directors.

GOV-4 Statement on due diligence

30-32 FiberCop, despite being in the start-up phase of its corporate structure, fully recognizes the centrality of due diligence in the management of sustainability issues and in the monitoring of

the current and potential impacts generated by the Company along the entire value chain: the structure of the managerial committees guarantees the exercise of due diligence through a structured monitoring of environmental, social and governance issues, integrating them into decision-making processes and business management mechanisms. The model adopted allows due diligence to be integrated into governance processes and business management mechanisms, ensuring that impacts, risks and opportunities are identified, assessed and addressed through prevention, mitigation and continuous monitoring measures. The assessment of negative impacts and opportunities is carried out according with to the double materiality analysis, with an evidence-based approach and the involvement of responsible departments and relevant stakeholders.

FiberCop's due diligence system evolves coherently with the strengthening of ESG processes and will accompany the development of the governance model in the coming years, contributing to full compliance with the European Sustainability Reporting Standards and the expectations of the European regulatory framework.

The fundamental elements shown in the following table provide an initial framework for the management of the impacts that FiberCop generates or could generate in the ESG field.

IMPACT MANAGEMENT FRAMEWORK

Key elements of due diligence	Sustainability statement paragraphs	Explanation of the reflection in its sustainability statement
<p>Integrate due diligence into governance, strategy and business model</p>	<p>GOV 1 Role of administrative, management and control bodies GOV 2 Information provided to administrative, management and supervisory bodies on sustainability matters SBM 3 Impacts, risks and opportunities relevant to the strategy and business model</p>	<p>FiberCop, despite being in the start-up phase of its corporate structure, fully recognizes the centrality of the duty of diligence in the management of sustainability issues and in the monitoring of current and potential impacts generated along the entire value chain. The structure of the managerial committees guarantees the integration of ESG aspects within the decision-making processes and corporate management mechanisms, ensuring coordinated and systemic oversight of environmental, social and governance issues. FiberCop integrates due diligence into its governance mechanisms thanks to these managerial committees ensure the full integration of impacts, risks and opportunities in decision-making processes, strategic planning and operational management. The system ensures that ESG elements are constantly considered throughout the value chain.</p>
<p>Involve stakeholders in all key stages of due diligence</p>	<p>GOV 2 Information to management bodies SBM 2 Stakeholders' views IRO 1 Process of identifying and assessing impacts, risks and opportunities</p>	<p>FiberCop's approach to due diligence is based on evidence and the involvement of responsible departments and relevant stakeholders. Impact assessment and analysis activities are conducted through structured discussions with internal and external stakeholders, ensuring that expectations, emerging risks and stakeholder perspectives are adequately incorporated into the definition of priorities and business decisions. FiberCop engages internal departments and relevant stakeholders through evidence-based analysis and structured listening paths. The due diligence process systematically incorporates input from internal stakeholders, communities, institutions, and supply chains to ensure a comprehensive assessment of ESG impacts.</p>
<p>Identify and assess negative impacts</p>	<p>SBM 3 Impacts, risks and opportunities relevant to the strategy and business model IRO 1 Description of the process for identifying and assessing relevant IROs</p>	<p>The identification and assessment of negative impacts are carried out in line with the double materiality analysis. Current and potential impacts are analysed with a data-driven approach, combining internal evidence with input from relevant departments and stakeholders. This methodology makes it possible to determine the severity and likelihood of impact, as well as to identify material risks and opportunities to be managed as a matter of priority. The assessment of impacts is carried out in line with the double materiality analysis and through structured methodologies that consider the severity, probability and contributions of the responsible departments. The approach allows for the early identification of current and potential negative impacts along the value chain.</p>
<p>Taking action to address negative impacts</p>	<p>E1 Climate change S1 Own Workforce S2 Workers in the value chain S3 Affected Communities</p>	<p>The due diligence model adopted by FiberCop provides for the activation of prevention, mitigation and continuous monitoring measures of the negative impacts identified. The results of ESG assessments guide the adoption of structured actions to address current and potential impacts, integrated into governance processes and the corporate management system. Continuous supervision, ensured by the responsible departments and committees, allows for timely intervention and progressive strengthening of controls. FiberCop implements prevention, mitigation, control and remediation measures on relevant impacts. The actions are integrated into corporate governance and processes, supported by managerial committees and oriented towards the effective management of environmental, social and governance impacts.</p>
<p>Monitor the effectiveness of interventions and communication</p>	<p>E1 Climate change S1 Own Workforce S2 Workers in the value chain S3 Affected Communities</p>	<p>The due diligence system evolves in line with the strengthening of ESG processes and will accompany the development of the governance model in the coming years. The effectiveness of the actions implemented is monitored through continuous verification mechanisms, internal reporting and review, ensuring alignment with the European Sustainability Reporting Standards and European regulatory. Communication takes place through periodic updates from the governing bodies and through sustainability reporting. FiberCop monitors due diligence through an evolving system, based on periodic reporting, internal audits, multi-level governance and integration into decision-making processes. Communication of the results is ensured through the involvement of the Management Committee and the Board of Directors and Sustainability Reporting in accordance with the ESRS.</p>

GOV-5
Risk management and internal controls over sustainability reporting

36a,b,c,d As required by the European Directive 2022/2464/UE and by Italian Legislative Decree 125/2024, the information included in ESRS 2, applicable to all companies, has been taken into account. Following the assessment carried out through the double materiality analysis - which also included the analysis and prioritisation of the risks - the specific disclosures to be reported under the standards were identified. The specific sections outline the actions undertaken to achieve the objectives and the risk-mitigation measures adopted. To facilitate the data collection process, a dedicated digital platform has been implemented that guarantees structured and standardized data collection, ensuring accuracy, traceability and verifiability of the required information in line with the requirements of the European Directive and Italian Legislative Decrees, optimizing the reporting process and strengthening controls through an automated approval workflow.

The digital platform contains all the indicators of the European Sustainability Reporting Standards

materials for FiberCop and has made available an open channel with the Sustainability department that supports other departments so that the information is complete and complies with the requirements of the standards.

In anticipation of the reporting obligation³, the Company undertakes to assess the risks associated with the Sustainability Statement and to implement a sufficient level of internal control to mitigate them. In addition, FiberCop's Sustainability department has defined procedures and tools aimed at ensuring the reliability, accuracy and reliability of the information reported, as well as the correct use of sustainability standards in the preparation of the Statement itself.

36e Meanwhile, on the 2025 voluntary document, the following internal controls have been implemented:

- a structured reporting process to Top Management and the Board of Directors on the main evidence and collection of relevant data as well as on the final document;
- a digitized process for approving the content provided by the owners of the data by competence of the department managers;
- the formalization of the process, through a dedicated procedure, for the preparation, approval and dissemination of sustainability reporting.

³ FiberCop falls into wave 1 Ominbus.



SBM-1 Strategy, business model and value chain

The ecological and digital transitions are now structural factors that decisively influence the competitive context in which FiberCop operates.

At the international level, these transitions are integrated into the strategies of the European Union and the United Nations, through the European Green Deal, the Next Generation EU programme and the decarbonisation and technological innovation policies that guide the transformation of production and infrastructure systems. In the national context, the National Recovery and Resilience Plan – updated in 2023 and 2025 – provides resources of 194.4 billion euros and confirms the centrality of the missions dedicated to the "Green Revolution and Ecological Transition" and "Digitization, Innovation, Competitiveness and Culture". These interventions further strengthen the role of the so-called "twin transitions", recognizing them as fundamental levers for long-term sustainability and for the competitiveness of the Country.

40e,f FiberCop has the most extensive network infrastructure in Italy and has the mission of contributing to the economic development of the Country and its digital transformation by offering

services as a "wholesale company". The main services offered concern: (i) pay-per-use access services to the proprietary network, (ii) industrial co-location services, (iii) network engineering, energy and delivery services and (iv) sale of IRU (Indefeasible Right of Use) on the secondary network and other equipment.

FiberCop's main customers are Telecommunications and Data Center Operators, ISP/WISP (Internet Service Provider and Wireless Internet Service Provider) for retail, large companies and public administration markets. Within this framework, FiberCop integrates ecological and digital transformations into its industrial strategy, orienting the business model towards the technological evolution of network infrastructures and the reduction of environmental impacts, in line with its infrastructural role and stakeholder expectations. These transformations must be based on three fundamental dimensions: environmental, social and economic.

The integration of ESG criteria is therefore essential to ensure a sustainable and competitive transition, in line with European and national policies.

40ai,aii In this context, FiberCop, the first example in the EU of separation of infrastructure ownership from the national incumbent telecommunications operator, takes on a strategic role, managing the most advanced and widespread digital network in Italy, with over 27

million kilometers of optical fiber and ultra-broadband coverage of more than 96% of active lines, reaching about 40% of national real estate units with FTTH (Fiber To The Home) technology.

40b Thanks to its infrastructure and the expertise of its human resources, as better described in the Social Information - ESRS S1, FiberCop, with a turnover of approximately 4 billion euros in 2025⁴, contributes to the Country's economic growth, to the support of public administrations and to the growth of digital citizenship.

40aiii All FiberCop people operate in Italy.

40g As reported in the Press Release of the first semester 2025, the strategic guidelines 2025-2029, confirmed by the Board of Directors on September 8th 2025, are based on innovation and sustainability, the pillars of FiberCop's strategic development, which allocates significant resources to the expansion of fiber optics – a more sustainable and future-oriented technology than traditional solutions – both in areas already equipped with fiber infrastructure and in those historically served exclusively from copper networks. The investments are also supported by funds from the National Recovery and Resilience Plan (PNRR), for which FiberCop is the recipient of about 2.3 billion euros. The calls provided for by the PNRR represent decisive elements for the technological advancement and digitization of the country.

⁴ For further details, please refer to IFRS 8 of the Annual Financial Report, which reports a single category (segment) of turnover, not making it necessary to provide the detail required by ESRS 2 SBM-1 40.



The Plan envisages investments of €6.7 billion dedicated to the construction of ultra-broadband networks, which will allow:

- the acceleration of the FTTH network rollout, with the completion of the planned coverage expected by 2027 (2027 target = 20.3 million premises, closing 2025 = 14.3 million connected premises which correspond to 70% of the 2027 target achieved);
- the completion by June 2026 of the PNRR plan for FTTH;
- the switch-off of the traditional copper network, which will start in 2026, which is expected to give further impetus to the digitalisation of the national network and generate significant operational savings, while ensuring that essential services are not interrupted for retail customers, companies and the PA;
- the development of the skills of specialized personnel;
- the construction of a modern national network backbone, launched by FiberCop in 2025;
- the achievement of relevant ESG targets, with a significant reduction in energy consumption, to contribute to a low-emission future.

In addition to the ESG objectives included in FiberCop's strategic guidelines, the sustainability plan is divided into additional objectives to which the related actions

are associated. Within the various departments, further targets are then set out with ESG impacts monitored monthly and shared with Top Management.

42a,b FiberCop's business model is based on the efficient use of multiple strategic inputs that enable the Company to fulfill its role as a national infrastructure operator. Key inputs include:

- economic and financial capital, required to support investments in the fiber optic network, asset modernization activities, and technological development programs;
- physical network infrastructure, consisting of primary and secondary networks, exchange equipment, fiber optic backbones, and technical sites distributed across the country;
- energy and environmental resources, with reference to the electricity requirements for the operation of telecommunications equipment and cooling systems, as well as renewable energy procurement initiatives and energy efficiency projects;
- human capital, represented by the specialized technical skills, engineering know-how, and operational and professional capabilities of FiberCop people and network companies operating along the value chain;

- relational capital, consisting of relationships with wholesale operators, strategic suppliers, supply chain companies, institutions, regulators, and local stakeholders.

These inputs are ensured through structured investment planning processes, supply chain selection procedures, energy management systems, and professional development programs, which guarantee the continuous and resilient availability of the resources necessary to operate the business model. FiberCop transforms these inputs through an integrated set of operational and technical activities that form the core of its infrastructure model. In particular:

- it designs, builds, and maintains fiber optic access and transport network, including installation, testing, and commissioning of the infrastructure;
- it manages asset modernization through structured programs for the replacement of obsolete equipment, energy efficiency improvements, and optimization of exchanges, contributing to the reduction of consumption and associated emissions;
- it conducts network monitoring and management activities through digital systems and continuous control platforms that ensure the reliability,

resilience, and quality of service offered to operators;

- implements the decommissioning plan, which allows for the gradual decommissioning of the legacy copper network and the migration to high-performance, lower-environmental-impact FTTH/FTTX solutions;
- coordinates and oversees the supply chain, ensuring technical standards, operational safety, quality of workmanship, and compliance with relevant environmental and social requirements;
- develops engagement activities with stakeholders and institutions to ensure strategic alignment with the country's digitalization priorities and the current regulatory framework.

The output generated by these activities consists of a modern, resilient, and high-capacity digital infrastructure, made available to telecommunications operators.

The outcomes produced include strengthening national connectivity, enabling the digital transformation of citizens, businesses, and public administrations, reducing the environmental impacts associated with legacy technologies, and creating sustainable value for the country and stakeholders along the entire value chain.



The Company invests significant financial resources in the development of the national digital infrastructure, supporting:

- the expansion of the fiber network;
- the decommissioning of the legacy copper network;
- the FiberCop's strategic guidelines and ESG objectives.

As previously mentioned, these investments are also supported by PNRR funds, essential for accelerating the Country's digitalization.

To build and operate its network, with a focus on

sustainability, FiberCop uses electricity, with an increasing share from renewable sources through EnerCop⁵, technical and infrastructure materials, and indirect environmental resources along the supply chain.

Highly qualified human capital is a strategic asset: FiberCop's network would not exist nor be able to evolve without the activities of the upstream value chain.

42c FiberCop operates at the heart of the telecommunications value chain in Italy, contributing to the development of digital infrastructure.

Upstream, the Company collaborates with qualified suppliers of technologies and services necessary for

the construction, maintenance, and modernization of the network. FiberCop's supply chain in 2025 consists of approximately 900 direct suppliers (tier 1) and approximately 1,000 subcontractors (tier 2). Purchases are made primarily from companies headquartered in Italy and are primarily directed towards the following product and service categories:

- telecommunications networks;
- telecommunications products;
- information technology;
- professional and technical services;
- power supply systems.

Within these categories, companies that carry out network infrastructure construction, as well as companies responsible for property management and maintenance, and logistics, play a strategic role. Direct activities form the core of FiberCop's operating model, entirely dedicated to the construction and management of fixed network infrastructure.

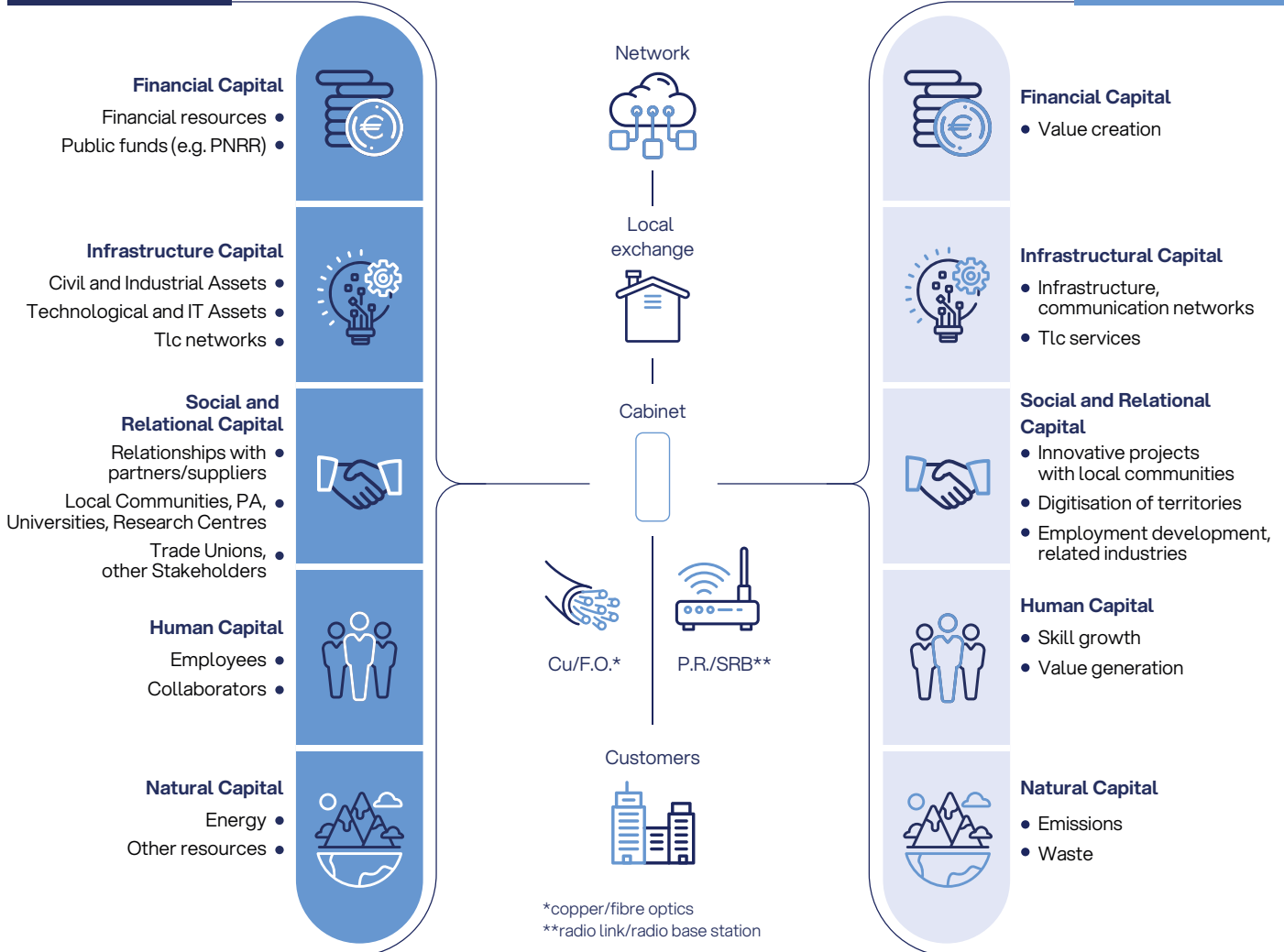
The technical architecture extends from the high-capacity transport network to the last mile, passing through terminal exchanges and distribution cabinets, with connections made of both fiber optic and copper, as well as infrastructure for mobile connectivity via radio links, also connecting base

⁵ The Company is wholly owned by the HoldCo Group, of which FiberCop is a part. EnerCop is a start-up operating in the energy sector.

FIBERCOP'S VALUE CHAIN

INPUT

OUTPUT



stations of other telecommunications operators. Operational activities include network deployment and development, management and monitoring of exchanges and nodes, and the quality of service provided, as well as the activation and delivery of network service to customers. These activities are carried out both by FiberCop personnel and by using external companies. Commercial and staff activities generally support the Company's entire operations. Downstream, FiberCop provides services to telecommunications operators who, by accessing the network on a wholesale basis, compete with each other in offering retail connectivity. The wholesale-only model guarantees all operators equal access to the same technical and financial conditions, eliminating discriminatory behavior. Citizens, businesses, and public administration are the indirect beneficiaries of the infrastructure, whose connectivity experience depends substantially on the quality and coverage of the network built and managed by FiberCop, even without having any direct contractual relationship with it.

STAKEHOLDER INVOLVEMENT

FIBERCOP PEOPLE

- Information and dissemination of corporate culture
- Listening, verification and involvement also with a view to identifying new initiatives
- Information, consultation, negotiation for change management

COMMUNITY

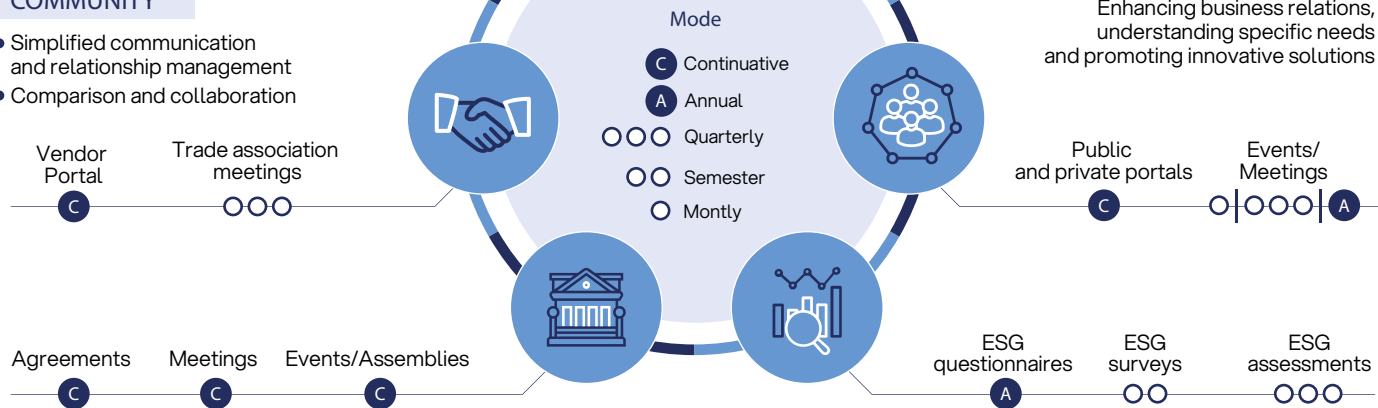
- Content dissemination: ensuring transparent and accessible information to maintain an ongoing dialogue with the community, strengthening trust and awareness of corporate initiatives

SUPPLIERS AND BUSINESS COMMUNITY

- Simplified communication and relationship management
- Comparison and collaboration

CUSTOMERS

- Enhancing business relations, understanding specific needs and promoting innovative solutions



INSTITUTIONS AND REGULATORY BODIES

- Institutional dialogue
- Facilitating the development of corporate projects
- Collaboration to solve critical issues at central/local level
- Sharing of institutional projects at central and territorial level

SHAREHOLDERS AND FINANCIAL COMMUNITY

- Sustainability and transparency: ensuring alignment of strategies with market standards, promoting the creation of shared value and strengthening confidence in responsible management

SBM-2

Interests and views of stakeholders

45a Stakeholder involvement is a strategic element for FiberCop, as it allows it to understand and integrate expectations, needs and priorities into business decision-making processes.

The Company has identified six categories of top-level stakeholders, divided into twenty subcategories: FiberCop People, Institutions and Regulatory Bodies, Shareholders and Financial Community, Customers, Communities, Suppliers and Business Community. A structured and continuous dialogue is in place with these stakeholders, through differentiated tools and methods, managed by the various corporate departments, with the aim of building relationships based on trust and transparency and encouraging the identification of opportunities for improvement and innovation. The process is part of the broader context of the whole Country, which represents the transversal reference for understanding relations with stakeholders and the impacts generated.

45aiii, aiv, av, b In addition to the opportunities for discussion already provided as part of normal business activities, FiberCop has adopted a proactive approach to involve stakeholders in the definition of strategic priorities. For further information on the considerations relating to the interests and opinions of FiberCop's main stakeholders, please refer to the provisions of the ESRS 2 IRO-1 disclosure obligation, relating to the analysis of double materiality, and ESRS 2 GOV-4, concerning due diligence processes.

45d The FiberCop Management Committee is the administrative, management and managerial control body to which the needs that emerged from the discussion with the Company's stakeholders are reported through the C-Levels. The presence of the Chief Corporate Officer, responsible for ESG issues, and the CEO/Chairman, ensures on the one hand the correct management of requests and, on the other, communication with the Board of Directors for the most appropriate integration of stakeholders' interests and points of view within corporate strategies. The capillarity of FiberCop's activities allows a direct and continuous dialogue between stakeholders and local and central Company representatives.

↳ **ESRS 2 IRO-1**

Description of the processes to identify and assess material impacts, risks and opportunities

53a The Sustainability department began the process of identifying and assessing significant impacts, risks and opportunities as early as the second half of 2024, following the establishment of the current FiberCop. During 2025, the Company adopted an initial structured approach for the analysis of double materiality, aimed at identifying impacts, risks and opportunities through which it is possible to identify the material topics for FiberCop. The analysis made it possible to identify and describe the direct and indirect effects (inside-out) that each theme has on the environment and people.

Similarly, the analysis allowed us to identify and describe the indirect effects that the context in which the Company operates could have on it (outside-in). The double materiality analysis forms the basis of the Sustainability Statement and represents an essential input for strategic planning.

53b The process carried out was divided into several key phases. Firstly, the context analysis carried out at the time of the separation and birth of FiberCop was reanalysed and which, with the support of a

dedicated platform and starting from a wide initial set of topics (over 100 topics), led to the identification of the relevant impacts for the Company. On this basis, the list of impacts was verified through the involvement of the main categories of stakeholders, with whom the ESG areas of greatest relevance for each group were explored.

In particular, investors' expectations were collected on an ongoing basis during periodic one-to-one meetings. **53bi, bii** The suppliers' point of view was acquired through a survey administered to 290 participants during the event Together we Connect the Future. **53biii** Discussion with institutions, communities and business community took place through focus groups involving representatives of large communities of reference. Finally, the contribution of the younger generations was explored during a dedicated workshop held at H-Farm College. Structured listening to stakeholders has made it possible to strengthen the robustness of the impact identification process and reconfirm the strategic priorities and areas of greatest relevance for FiberCop.

With regard to the impact assessment phase, a survey was conducted involving a qualified sample of employees, identified among the Change

Leaders⁶ and Ambassadors⁷, collecting a total of 230 responses. This activity made it possible to estimate the extent of the impact, while the additional assessment variables were analysed by the Sustainability team on the basis of internal evidence and KPIs.

The evaluation was developed in two main steps. First, for each impact, the severity was determined, as a synthesis of the dimensions of magnitude and scope, through a 3x3 matrix that allowed the attribution of a high, medium or low level of severity. In a second step, the relevance of the impact was defined by combining the severity thus determined with the probability of occurrence, again by means of a 3x3 matrix, assimilating certain events to those characterized by high probability.

53c The overall corporate risk profile includes assessments of risks, including ESG risks, that could impact the achievement of corporate objectives. In particular, ESG risk assessments are shared with the Sustainability department in order to associate them with ESG topics and identify relevant ones.

In the Risk Management analysis within the CFO area, additional contextual elements are taken into consideration to better frame the assessments, including:

- the recommendations issued by the Task-Force on Climate-related Financial Disclosure (TCFD), which provide a framework regarding the climate risk categories to be considered for comprehensive and transparent reporting;
- the European Taxonomy Regulation and its delegated implementing acts;
- the ESRS E1 standard.

For financial materiality, the identification of ESG risks was carried out in collaboration with the ERM department, in order to ensure a structured analysis consistent with the overall corporate risk management system described below. The current assessment methodologies evaluate risks in terms of:

- inherent risk, i.e. not taking into account the mitigating factors in place;
- residual risk, taking into account the mitigating factors in place.

In order to support the assessment, matrices have been defined for assessing the impact and probability of risks on three levels (high, medium and low).

With reference to the risk impact variable, the following types are identified, which can occur individually or jointly (and/or):

- economic – financial, i.e. the estimated value of the possible loss that could be generated by the occurrence of the event;
- reputational damage, i.e. the possible reputational/media damage that the Company may suffer when a certain event occurs;
- regulatory compliance, i.e. the possible impact related to non-compliance with regulatory obligations and requirements in line with the current directives and regulations;
- operational, i.e. the impact it has on business processes assessed in terms of the temporary limitation or suspension of an activity when a specific event occurs.

⁶ People within FiberCop who act as spokespersons for change, with key roles such as spreading awareness of change within their network, listening to and gathering ideas and feedback from colleagues, acting as internal influencers and role models, and supporting consistency in communication and behavior within teams.

⁷ People within FiberCop, persons with strong engagement and communication skills, capable of bringing about transformation in practice and in day-to-day activities.

With reference to the probability/frequency variable, each risk is assigned a level between 1 and 3 on the basis of the criteria in the table below

With specific reference to ESG issues, the related assessments were taken into consideration, considering only the economic-financial area.

Significant risks are those that have at least an average probability and impact assessment.

53d FiberCop has adopted an ERM model that is constantly evolving and aligned with international regulations and standards.

This model not only facilitates the identification, assessment and management of risks, including those related to environmental, social and governance factors, but also promotes collaboration and synergy between the stakeholders involved in the assessment of the internal control and risk management system. The ERM process is designed

to identify potential events that could affect business operations, manage risks within acceptable thresholds, and provide reasonable assurance that the Company's goals will be achieved.

Specifically, FiberCop identifies and updates its risk portfolio through the analysis of FiberCop's strategic guidelines and the main investment projects, the monitoring of the external context, the analysis of operational processes and periodic reviews with risk owners. In addition, specific analyses are conducted on the risks that affect Company assets and a continuous assessment of the risk profile to identify any changes and emerging risk scenarios. Risks are assessed not only individually, but also as part of a portfolio, taking into account interdependencies and correlations, where possible, to gain a deeper understanding of overall exposure

and systemic vulnerabilities. The ERM model supports Management in defining and monitoring the implementation of risk mitigation plans, ensuring that appropriate actions are taken to effectively address the identified risks. It also ensures a structured flow of information to top management, enabling informed decisions and effective strategic alignment.

53e As already described, the overall corporate risk profile includes the assessment of risks, including those of an ESG nature, that may impact the achievement of corporate objectives. In particular, ESG risk assessments are shared with the Sustainability department in order to associate these risks with the corresponding ESG topics and identify the relevant ones. With reference to financial materiality, the definition of risks was supported by the Group's ERM department, making an association with sustainability topics.

PROBABILITY OF OCCURRENCE

High	Probability of occurrence > 50% / The risk event is expected to occur very frequently in the coming year
Medium	Probability of occurrence between 20%-50% / The risk event is expected to occur several times in the next year
Low	Probability of occurrence <20% / Unexpected event that is unlikely to happen

53g In order to carry out ERM activities, the following input data are analysed:

- the strategic guidelines;
- analyses of the evolution of the internal and external context (e.g. evolution of regulatory, macroeconomic and competitive dynamics);
- the list of company risks;
- the results of the monitoring of the mitigation actions (action plan) identified in ERM sessions and of the risks monitored continuously;
- the periodic reporting shared by the other corporate control departments (e.g. Compliance and Internal Audit, Security) regarding the results of the activities carried out.

In addition, in order to assess the risk, specific interviews are carried out with process & risk owners and data such as KPIs, ad hoc indicators, historical data, etc., are collected.

53ciii The analyses are then shared, through structured interview sessions, with the C-levels responsible for each business area, including the Chief Corporate Officer, who has the mandate to oversee ESG issues. At the end of the risk identification phase, the ERM department updates the risk map and shares it with the Global Risk Committee for review and approval. Risks related to sustainability integrated within the ERM model are addressed in accordance with the management procedures set

out in the model. **53h** The ERM process is subject to continuous updating by virtue of the evolution of the internal and/or external context.

53f As regards the opportunities identified, these were defined and evaluated in terms of probability and severity through a survey of the activities with the department managers, taking into account the recent establishment of FiberCop. Opportunities with evaluation on the two variables from medium to high were considered material.

The process and results of the IRO analysis were subjected to a multi-level validation activity. First, the Chief Corporate Officer verified its alignment with the Company's strategy and compliance with regulatory requirements.

Subsequently, the Management Committee analysed the process, the evidence of impact, the risks and the opportunities, confirming the analysis for the subsequent passage in the Board of Directors at the end of January 2026. For further details, see GOV-122 ciii.

As already described, in anticipation of the reporting obligation, the Company undertakes to assess the risks associated with Sustainability Statement and to implement a level of internal control sufficient to mitigate them.

In addition, FiberCop's Sustainability department has defined procedures and tools aimed at ensuring the reliability, accuracy and reliability of the information

reported, as well as the correct use of sustainability standards in the preparation of the Report itself.

↳ **ESRS 2 IRO-2**

Disclosure requirements in ESRS covered by the undertaking's sustainability statement

For cross-references to the information elements referred to in the cross-cutting and thematic principles deriving from other EU legislative acts, please refer to the table in the annex to this document.

↳ **ESRS 2 SBM-3**

Material impacts, risks and opportunities and their interaction with the strategy and business model

48a,b,c Following is a description of the impacts, risks and opportunities that emerged from the double materiality analysis.

53biv A number of 35 IROs have been identified, aggregated and reduced to 6 material themes as well as 2 entity specific ones in consideration of the coverage and homogeneity of the topics analysed. Impacts assessed as low materiality, based on the criteria adopted in the analysis, are not considered

relevant for the purposes of Sustainability Statement and, therefore, are excluded from the topics subject to reporting. The material issues identified are closely

related to FiberCop's business model and core operating activities. They are mainly attributable to the development, management and maintenance of the

fiber optic network infrastructure, directly involving operations and the entire value chain.

IMPACTS

	Theme	Topic	Impact Description	Time Horizon	Relevance	Type	Nature	Value Chain	Main Stakeholder
E	Climate change and decarbonization	GHG Emissions	CO ₂ emissions from business operations and energy-intensive value chain, with an impact on global warming	Short term	High	Actual Negative	Irremediable	Direct and Indirect	Community
			The intensive network development and fiber deployment lead to an increase in frequency and magnitude of transport activities for construction sites	Short term	High	Actual Negative	Irremediable	Indirect	Community
		Energy Efficiency	The development of the network and FiberCop activities require significant consumption of electricity and fuel, which can impact the availability of energy resources	Short term	Medium	Actual Negative	Remediable	Direct	Community
S	Health and Safety at Work	Accidents	FiberCop's operational activities expose some categories of workers to physical, thermal (heat waves), and mechanical risks. These conditions can generate direct impacts on people's health and safety	Short term	Medium	Actual Negative	Irremediable	Direct and Indirect	FiberCop People and supply chain workers
		Engagement and well-being	Organizational well-being, considered overall as adequate working conditions, opportunities for growth, and the enhancement of resources, is a determining factor in FiberCop's attractiveness as a sustainable employer. The increase in days spent in the office and the absence of other conditions capable of generating organizational well-being may impact employee motivation, including that of the younger generations	Short term	High	Actual Negative	Remediable	Direct	FiberCop People, Investors
	People Development	Training and skills development	Rapid technological development requires continuous skills updates, especially in AI, sustainability, and cybersecurity. Lack of structured programs may compromise future competitiveness and impact employee skills	Short and Medium term	High	Potential Negative	Remediable	Direct	FiberCop People, Investors
		Fair and inclusive working environment	FiberCop's Diversity & Inclusion plan promotes an inclusive environment, fostering fairness, equality, and equity in workplace relationships	Short term	High	Actual Positive	-	Direct	FiberCop People, Investors
	Local Community Development	Digital inclusion	The migration plan from traditional voice and data technologies to fiber connections requires adherence to a new offer. Some vulnerable end customers (e.g. elderly with limited technological knowledge) may have concerns about adopting the operator's proposals and continuing to access telecom services	Short term	Medium	Potential Negative	Remediable	Indirect	Community
Infrastructure and territory		Excavation and fiber network installation activities may generate temporary impacts on the territory (especially urban mobility and citizen discomfort related to noise and typical street work logistics)	Short term	High	Actual Negative	Remediable	Direct	Community	
G	Sustainable Supply Chain	Working conditions in the supply chain	Failure to address social issues related to Human Rights by FiberCop suppliers may cause negative impacts on supply chain workers	Short term	Medium	Potential Negative	Remediable	Indirect	Suppliers and Business Community

RISKS

	Theme	Topic	Risk	Risk Description	Time horizon	Economic-Financial Relevance	Probability	Value Chain
E	Climate Change and Decarbonisation	GHG Emissions	Natural Events	The main challenge is divided into two fronts: on the one hand the Company may encounter difficulties in implementing its transition matrix due to economic and organizational factors, including dependence on the supply chain for the procurement of goods and services within the set timeframe; on the other hand, exposure to the increase in extreme natural events that particularly affect the Mediterranean area.	Short/medium/long	High	Medium	Indirect
			Supply Chain Dependency		Short/medium	Medium	Medium	Direct
		Energy Efficiency	Supply Chain Dependency		Short/medium	Medium	Medium	Direct
S	Health and Safety at Work	Accidents	H&S	There is significant legal and reputational risk related to the effective implementation of health and safety plans. This aspect is crucial not only for FiberCop's people but also throughout the supply chain.	Short/medium/long	Medium	Medium	Indirect
	People Development	Engagement and Satisfaction	Talent Acquisition / Generational Turnover	Potential critical issues related to skills management and generational turnover are highlighted. Technological evolution and market dynamics require the acquisition of new skills; FiberCop's current positioning may limit its ability to attract the best talent in the market. Added to this is an operational risk linked to the need to effectively manage generational turnover through the inclusion of new talent, to ensure the continuity of skills and business innovation.	Short/medium	High	Medium	Direct
		Training and Skills Development	Workforce		Short/medium	High	Medium	Direct
		Fair and Inclusive Work Environment	Discrimination and Unequal Treatment		Short/medium	Medium	Medium	Indirect
			Workplace Harassment		Short/medium	Medium	High	Direct
	Local Communities Development	Infrastructure and Territory	Third-party Litigation	In the context of digitalization legal, operational and reputational risks related to the security of physical infrastructures (poles, overhead cables, manholes) and their potential impact on third-party security are emerging.	Short/medium/long	High	High	Indirect
	Sustainable Supply Chain	Working Conditions in the Supply Chain	H&S	There is significant legal and reputational risk related to the effective implementation of health and safety plans. This is also crucial throughout the supply chain.	Short/medium/long	Medium	Medium	Indirect
G	Governance	Corporate Conduct	Fraud	With regard to the ethical conduct of business, the risks related to ethics and compliance issues relating to the ethical conduct of business, Health and Safety issues with reference also to the supply chain, GHG emissions, the management of data protection issues and ethical conduct in corporate conduct have been identified.	Short/medium	Medium	High	Direct
			Regulatory Non-Compliance		Short/medium/long	High	High	Direct
G	Entity Specific	Cybersecurity and Information Security	Cyber	Potential cyber attacks, system vulnerabilities and information security.	Short/medium/long	High	High	Indirect
			Information/Data Leakage		Short/medium	Medium	High	Indirect
	Business Continuity	Natural Events	Exposure to the increase of extreme natural events that particularly affect the Mediterranean area. Risks related to network resilience and security, also related to switch-off activities; unavailability of IT systems with consequences on the value chain. Obsolescence of systems/equipment.	Short/medium/long	High	Medium	Direct	
		Service Continuity during Switch-Off		Short/medium	High	Medium	Indirect	
		Network Interruption		Short/medium/long	High	Medium	Indirect	
		IT Service Disruption		Short/medium	High	Medium	Direct	
		Network Equipment Obsolescence		Short/medium	Medium	Medium	Direct	
Power and Cooling	Short/medium	Medium	Medium	Indirect				

OPPORTUNITIES

	Theme	Topic	OPPORTUNITIES	Time horizon	Relevance	Probability	Severity
E	Climate Change	GHG emissions	The definition of public SBTi ESG objectives favors the organization's focus on ESG issues with positive feedback in terms of reputation and access to credit.	Short-medium-long term	High	Medium	High
		Energy efficiency	Thanks to the transition to renewable sources and the progressive increase in electricity self-generation through its sister company EnerCop, FiberCop could obtain benefits in terms of reducing costs related to the supply of electricity from the grid	Short-medium-long term	High	High	High
	Resource Use and Circular Economy	Recovery of raw materials and decommissioned equipment	The recovery of copper and equipment involves an economic return for FiberCop thanks to the resale of raw material and equipment.	Medium term	High	High	High
S	Valuing people	Motivation, welfare and attractiveness	Flexible and hybrid work models can improve employee productivity and well-being, attracting new generations of talent while reducing operational costs	Medium-long term	High	Medium	Medium
G	Governance	Ethics and Compliance	Strong ethical practices and transparent codes of conduct can enhance brand reputation, attract ethical investors, and improve customer relationships	Short-medium-long term	High	High	High

48d The current approach adopted by the Company provides for qualitative assessments of the economic and financial impacts of ESG risks.

As regards the current financial effect of the most significant opportunity related to decommissioning, i.e. the extraction and sale of copper as a secondary material, during 2025 the quantification is €5 million. Over the course of the plan, the net positive impact of the extraction and sale of copper as a secondary raw material can be quantified at several hundred million.

As already reported, identified material IROs are covered by the ESRS disclosure requirements. The ESRS, with particular reference to MDRs (Minimum Disclosure Requirements) are used to report on Cybersecurity & Information Security and business Continuity, which characterise FiberCop's business. The description of the resilience of the strategy and business model, with reference to the ability to deal with the relevant impacts and risks and to seize the opportunities identified, as well as the details of

the prevention, mitigation and remediation actions associated with the individual impacts and risks, is provided in the thematic chapters of this Report. At a general level, the assessment of risks, impacts and opportunities contributed to defining the drivers of the ESG strategy, guiding strategic and operational choices towards a resilient and sustainable business model, and supporting FiberCop's contribution to the achievement of the United Nations Sustainable Development Goals (SDGs).

DRIVER ESG PLAN



PLANET

Net-Zero emissions

Net-Zero emissions target for **Scope 1** and **2**, and for **Scope 3**. Achieving emissions reductions and **validating targets through the Science-Based Targets initiative (SBTi)**



PEOPLE

Value of Human Capital

Promote a **diverse and inclusive workforce**, maintaining **gender equality certification** and strengthening **our people**



Health & Safety

Reducing accidents through both targeted actions and **training activities**



Local Communities

Expand **FTTH coverage** and involve **local communities** in projects to **increase social impact**



PROSPERITY

Business Ethics

Strengthen ethical **standards** by updating **policies, planning training and engagement**



Supply Chain

Involve suppliers on sustainability issues and **measure their performance**



Network security and resiliency

Ensure **long-term business continuity, data privacy and cybersecurity**



Environmental

In defining the strategy, in line with its business model, FiberCop has taken into account the material environmental impacts, both actual and potential, mainly related to energy consumption and greenhouse gas emissions along the entire value chain, integrating them into industrial and operational choices in order to strengthen the resilience of the business in the medium and long term.

To mitigate these impacts, FiberCop has defined a transition and decarbonization plan, with targets of reducing CO₂ emissions by 70% by 2030 and achieving Net-Zero for its emissions by 2040. These targets were validated by the Science Based Targets initiative (SBTi) in July 2025. The effect of impacts, especially environmental impacts, cannot be limited to the geographical areas of direct operation, since issues such as greenhouse gas emissions have a global reach.

For this reason, the material impact management strategy integrates both local and global considerations, with a focus on mitigating negative impacts and enhancing positive ones. A significant example is the choice, made at the end of 2024, to create a new company controlled by the same parent company as FiberCop, EnerCop⁸ operating in the energy sector for the promotion of energy self-production through the design and construction of photovoltaic systems, storage

8 <https://www.enercop.com/chi-siamo/>

systems and co- and tri-generation solutions, as well as the design and implementation of the modernization of the assets of Company sites for the optimization of consumption and the achievement of energy efficiency.

For FiberCop it represents an opportunity to cover a large part of its energy needs with the use of renewable energy in support of the Net-Zero emissions goal.

Social

As far as social impacts are concerned, health and safety emerges as a central issue, with both actual and potential impacts, which directly affect FiberCop staff and workers in the supply chain. In order to address these impacts in a structured way, the Company has chosen to establish the Safety Steering Committee as a tool for integrating the issue into the strategy and business model, ensuring the definition of strategic Health & Safety objectives. Human capital is recognized by FiberCop as a strategic enabling factor for the creation of value over time. In this context, the Company has launched a structured path of cultural transformation aimed at building a solid, innovative and inclusive organization, integrating the management of impacts on human capital into its medium and long-term strategy. Training and skills development are

strategic levers to support the evolution of the business model, making it possible to accompany technological and organisational change, mitigate potential impacts on human capital and strengthen the resilience of the strategy and business continuity in the medium and long term. FiberCop interprets innovation not only as technological advancement, but as a lever for the responsible management of material social impacts, addressing in a structured way both the actual impacts on the community deriving from construction site activities and the potential exclusion effects related to the digital transition of the most vulnerable categories, in order to strengthen the resilience of the business and ensure inclusive and sustainable infrastructure development in the medium and long term. Please refer to S3-4 for a description of the approaches and actions implemented.

Governance

Supply chain management is a crucial issue, with both actual and potential impacts in the short term. To address these impacts, FiberCop has adopted a strategy aimed at building long-term partnerships with its supply chain, integrating responsible supplier management into its business model. As part of this, in November 2025 the Company launched the Building Network program,

conceived as a structured initiative to engage the supply chain through activities and opportunities aimed at promoting the creation of shared value, strengthening operational resilience and overall sustainability of the business.

FiberCop has strengthened its governance system by establishing the Ethics and Compliance Management Committee, a body responsible for overseeing compliance risks, implementing ethical policies and monitoring the integrity of business processes. Obtaining ISO 37001 certification further consolidates this system, attesting to the existence of a structured system for the prevention and control of corruption risk fully integrated into the corporate governance framework.

In compliance with the principle of Corporate Responsibility, FiberCop operates in accordance with the values of honesty and integrity in the management of its tax activities, aware that tax revenues also represent a contribution to the economic and social development of local communities by the Company. Therefore, it pursues a conduct aimed at complying with applicable tax regulations, responsibly managing tax risk and safeguarding its image and reputation.

In this regard, FiberCop considers taxes as a cost of doing business which, as such, must be managed with the objective of protecting corporate assets and pursuing the primary interest of creating value

for stakeholders over the medium to long term. In order to align with best practices in tax management, the Company will adopt a Tax Strategy and a system of internal control over potential tax risks (Tax Control Framework). The Tax Department monitors the most recent tax updates and developments, provides tax advice and actively participates in technical discussions on regulatory developments through dedicated working groups and industry associations, such as Confindustria.

During 2025, FiberCop strengthened its IT Security and Cybersecurity oversight in order to prevent any cyber attacks and ensure its business continuity. In addition, during 2025 the 27001 certification on the IT security management system was obtained.

48h The analysis showed that some ESRS standards were not found to be material for FiberCop. In particular, E2 (Pollution), E3 (Water and marine resources) and E4 (Biodiversity and ecosystems) have not been identified as materials because infrastructure development activities, although involving interventions on the territory, do not generate significant impacts in terms of water consumption, water pollution, polluting emissions or substantial alterations to ecosystems. The excavation and laying of optical fiber follow methodologies and protocols that minimize interference with the territory and ecosystems and do not involve the

emission of pollutants: FiberCop's industrial activities substantially produce CO₂ equivalent from energy consumption. With a view to continuous monitoring and progressive strengthening of the understanding of its impacts, FiberCop has launched, on the recommendation of the Management Committee, a dedicated biodiversity assessment. This initiative is part of an evolving European regulatory context: the Corporate Sustainability Due Diligence Directive (CSDDD) and the ESRS standards progressively strengthen the expectations of companies in terms of ecosystem protection, requiring a greater understanding of indirect impacts along the value chain. A preliminary biodiversity analysis therefore allows FiberCop to anticipate future regulatory requirements, identify potential emerging risks related to the territory (e.g. in installation sites or infrastructure areas), improve its due diligence approach and demonstrate a responsible commitment to institutional stakeholders, investors and local communities. In addition, this assessment can strengthen the integrated management of environmental risks and complete the sustainability aspects overseen by the Company, ensuring a broader, more proactive and resilient vision even on issues that are not material today but potentially relevant in the medium term. The results of the analysis will be shared with the Company's top management in the first months of 2026.



Biodiversity Impact Assessment

The protection of biodiversity represents an emerging and strategic area for FiberCop, characterized by a significant methodological and informative complexity, which requires the adoption of dedicated and progressive analysis approaches.

At the end of 2025, FiberCop started the development of a specific biodiversity assessment, conceived as an autonomous technical-scientific tool, aimed at understanding and evaluating the interactions between company infrastructures, operational activities and the ecological contexts concerned. This assessment is intended as an indispensable knowledge base for a future structured, coherent and robust integration of biodiversity issues both in sustainability reporting and in corporate decision-making processes.

The methodological approach adopted is inspired by the LEAP framework of the Taskforce on Nature-related Financial Disclosures (TNFD), applied gradually

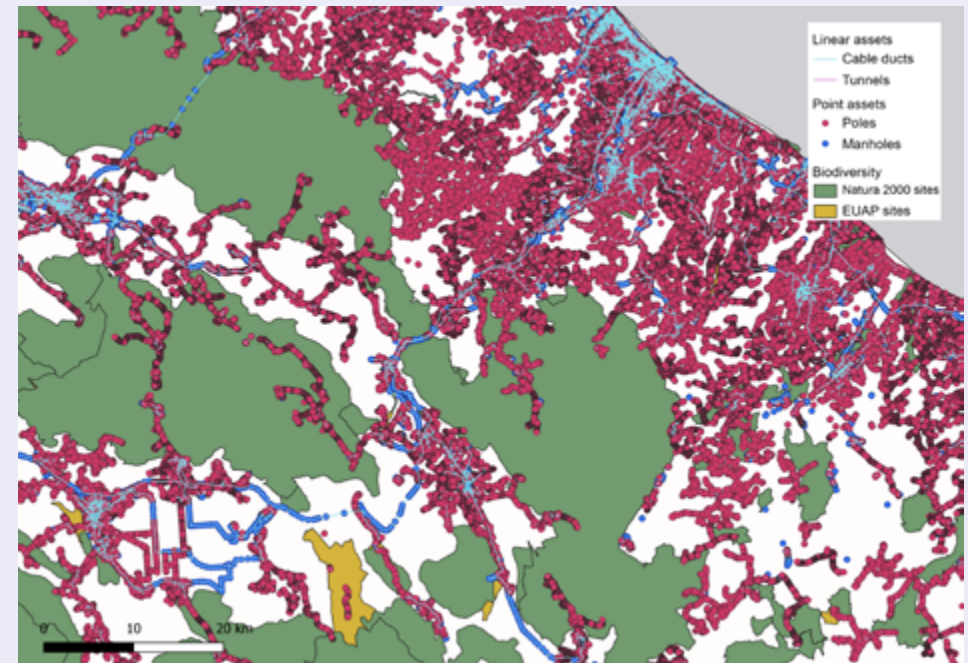
and adapted to FiberCop's operational specificities. In a first phase, a systematic mapping of the infrastructure assets was carried out and their overlapping with official and homogeneous environmental data on a national scale, such as the Natura 2000 Network and the Official List of Protected Natural Areas.

This analysis makes it possible to objectively identify the areas of greatest ecological sensitivity potentially affected by the company's activities. Subsequently, a territorial clustering methodology was developed, based on the matrix integration between the sensitivity of the biodiversity context and the magnitude of the pressures exerted by infrastructures and maintenance activities. The magnitude assessment distinguishes the impacts associated with the physical presence of assets from those related to maintenance activities, allowing a clear reading of the different pressure components.

The assessment is conducted using a desk-based, replicable and transparent approach, based on homogeneous spatial units (5 km × 5 km cells) and on

cartographic and operational criteria available on a national scale. The subsequent phases of the process include the in-depth analysis of the impacts, the analysis of the cumulative and temporal

effects and the definition of operational guidelines, any mitigation actions and monitoring indicators. The assessment will be completed in the first half of 2026 and will be shared with all stakeholders.



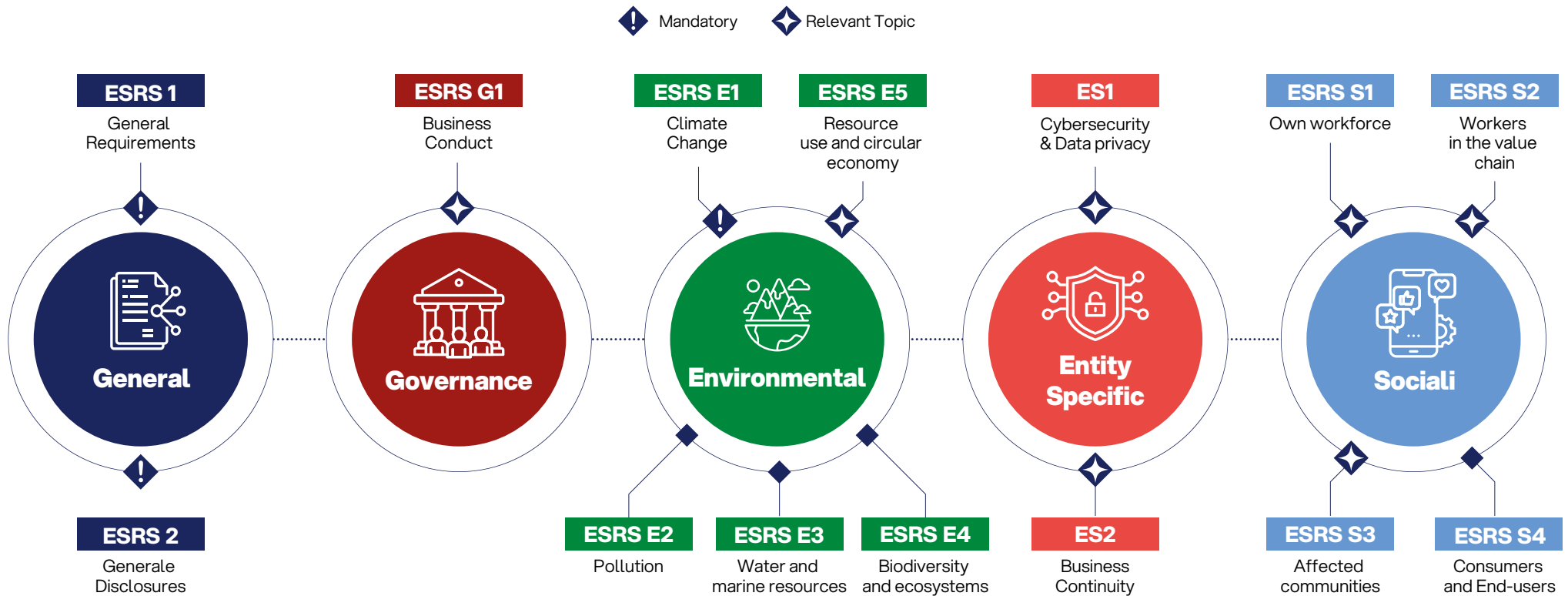
Example of GIS analysis of interference between FiberCop infrastructure and areas of high ecological sensitivity. The figure shows an excerpt from the GIS environment used to map point and linear infrastructure assets (e.g. poles, overhead and underground networks) and their overlap with areas belonging to the Natura 2000 Network and national and regional natural parks. Spatial analysis allows us to identify areas of potential interaction between corporate infrastructure and contexts of greatest ecological value, forming the basis for the subsequent assessment of the sensitivity of the biodiversity context and for the definition of impact clusters.

S4 (consumers and end users) was not found to be material in view of FiberCop's wholesale-only activity, which exclusively involves B2B relationships with telecommunications operators. FiberCop does not have direct relationships with end users, who are managed

by the operators who use the Company's infrastructure. The significant impacts, on the other hand, focus on areas directly related to the construction and management of the network infrastructure, including issues such as climate-altering emissions, energy efficiency,

workers' health and safety and the contribution to the digitalisation of the country. These represent the areas where the ability to influence and control is most direct and significant, and where FiberCop focuses its management and continuous improvement efforts.

EUROPEAN SUSTAINABILITY REPORTING STANDARDS (ESRS) ADOPTED BY FIBERCOP

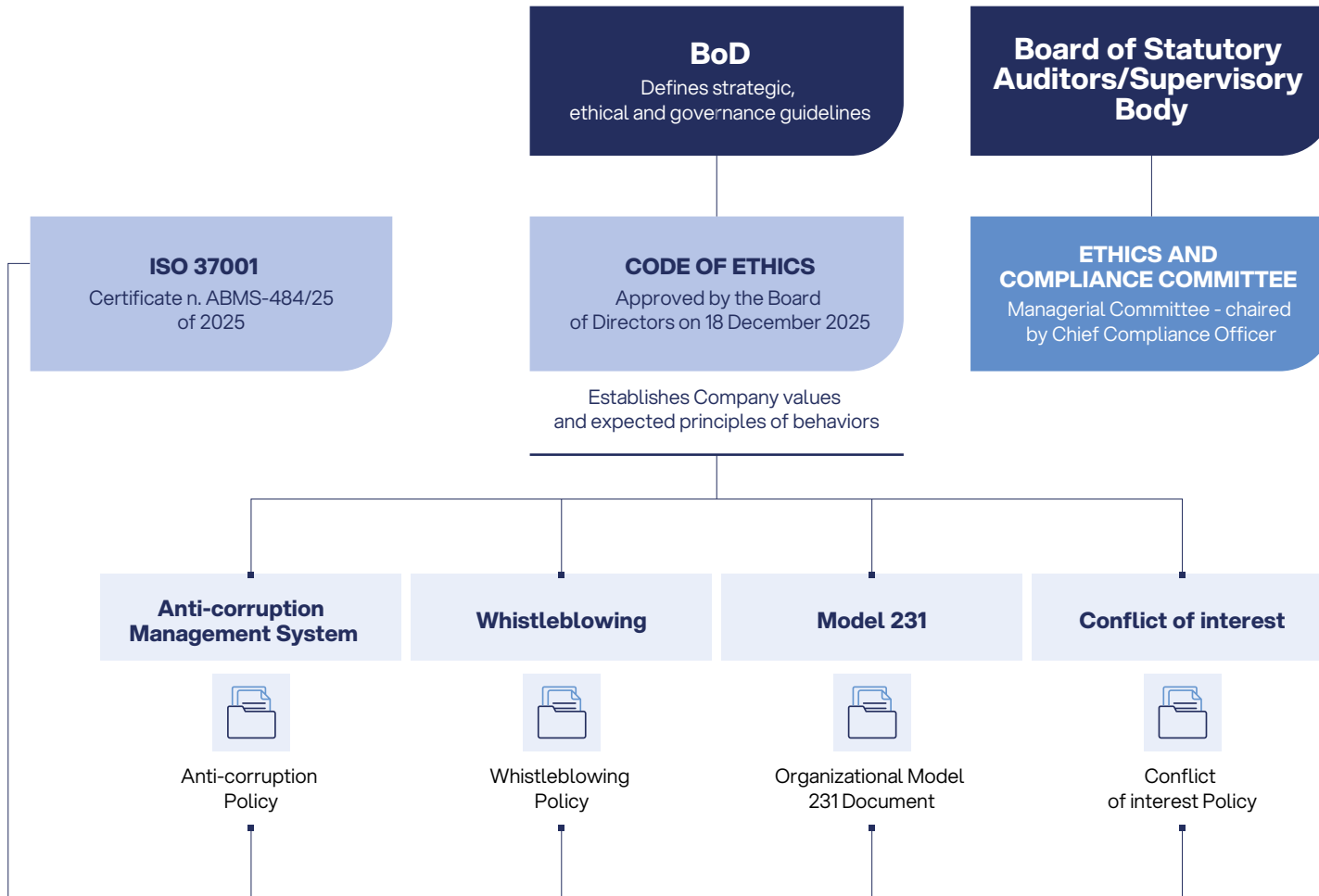




Governance Information

Business conduct

ESRS G1



ESRS 2 GOV-1

The role of the administrative, management and supervisory bodies

5a FiberCop's Governance system is composed of a Board of Directors chaired by the Chairman/Chief Executive Officer who holds executive powers, while the other Directors have non-executive powers.

In addition to the legal representation provided for by the Company statute, the Chairman/Chief Executive Officer retains responsibility for the Security Organization, communications and institutional relations at national and international level, as well as the supervision of the Compliance and Audit departments. Control is ensured by the Board of Statutory Auditors.

5b Regarding the responsibilities of administrative, management and control bodies in the field of business conduct, please refer to ESRS 2 GOV 21c.

G1-1 Corporate culture and business conduct policies

Governance in the field of ethics and Business Conduct is declined through a system of policies, models and procedures outlined here and described below.

7 Code of Ethics. In full conviction that ethics in the conduct of business represent the fundamental condition for the success of the Company, FiberCop adopted in December 2025 a new Code of Ethics, an institutional document that expresses principles, values and standards of conduct to guide the work of all people who, directly or indirectly, permanently or temporarily, work for FiberCop. The Code of Ethics guides the Company's daily actions, promoting integrity, transparency, responsibility and respect. It is the elective instrument to strengthen the corporate culture and to guarantee that every decision is consistent with the values that guide FiberCop.

It reflects the fundamental principles and ethical standards on which FiberCop's commitment to operate in a socially responsible manner is based. The same principles and standards are applied consistently across all governance policies. **8** Its

purpose is to highlight the Company's commitment to ethics, integrity and compliance with regulations, define standards of ethical conduct, provide tools for reporting known or suspected violations and help identify risks and prevent offences of any kind. The Code of Ethics is periodically subject to verification and updating by the Company's Board of Directors. It applies to all HoldCo Group Companies, of which FiberCop is a part, employees, members of corporate bodies, members of supervisory bodies, collaborators, consultants, suppliers and partners who establish direct or indirect relationships with Group Companies or indirect, on a stable or temporary basis or otherwise operate to pursue corporate objectives, no one excluded. The principles expressed in the Code represent a commitment to all stakeholders. **9** The widest dissemination of the Code is guaranteed through specific training and communication initiatives aimed at all recipients. The Code is also made available through its publication on the intranet portal of the Companies and on FiberCop's institutional website. **7** Model 231. As part of its commitment to an ethical, transparent and responsible governance model, FiberCop applies the 231 Organizational Model, aligned with Legislative Decree 231/2001.

8 This system is the instrument for managing legal and reputational risks and for protecting corporate integrity. The Model 231 contributes to:

- strengthen the monitoring of risks related to potential offences, through a structured approach of prevention and control;
- promote a culture of legality, ensuring that all those who work on behalf of the Company understand the responsibilities associated with any non-compliant conduct;
- consolidate the Company's commitment to ethical behaviour, in line with the Group's values and principles of sustainability;
- involve employees and external stakeholders in compliance with the rules and safeguards provided, contributing to the prevention of predicate crimes and the dissemination of good practices.



The supervision of the implementation and effectiveness of the Model is entrusted to an independent Supervisory Body, with autonomous powers of initiative and control. The Model applies to all persons who work within and on behalf of FiberCop, including managers, employees, members of the Corporate Bodies and third parties. The Board of Directors adopts Model 231 - including the General Part and the Special Part - and ensures that it is periodically updated on the basis of the indications of the Supervisory Body.

9 To promote full awareness of responsibilities, FiberCop provides dedicated training programs and makes the Model accessible through its intranet and the Group website.

Anti-Corruption management system. FiberCop considers legality and transparency to be essential values and prevents corruption according to the principle of "zero tolerance". FiberCop's Anti-Bribery Management System is certified with respect to the requirements of the ISO 37001 Anti-Bribery Management Systems standard, in line with the provisions of the applicable regulations on the prevention of corruption, the 231 Organisational Model, as well as the principles expressed in the Code of Ethics. To govern the Anti-Corruption Management System, the Board of Directors, as the governing body, has identified the Ethics and Compliance Committee as top leadership, as

well as the Compliance department to guarantee compliance for the prevention of corruption. The Anti-Corruption Management System provides guidelines for defining, implementing, maintaining, reviewing and improving the Anti-Corruption Management System. In particular, it outlines the purpose and scope, roles and responsibilities, reference procedures, risk assessment methodologies, training and communication activities, as well as reporting and internal audit processes. It also identifies operations, projects, activities, relationships and professional figures with a low risk of corruption, providing specific prevention measures for them. FiberCop adopts an Anti-Corruption Management System certified by an accredited third party, in accordance with the ISO 37001 standard, a recognized international standard for the prevention, detection and combating of corruption. This system represents a pillar of responsible corporate governance and contributes to the protection of the Company's reputation and full compliance with national and international regulatory requirements.

7 The central element of the system is the Anti-Corruption Policy, an integral part of the broader framework of business ethics and internal control. The Policy promotes a culture based on honesty, integrity and transparency, strengthening the adoption of correct conduct and the prevention of

corrupt practices along the entire value chain.

8 FiberCop's Anti-Corruption Policy aims to:

- manage the risk of corruption with a "zero tolerance" approach;
- ensure full compliance with Anti-Corruption regulations;
- protect the Company from negative impacts resulting from breaches, including reputational risks;
- encourage the use of reporting tools for any illegal conduct, including by third parties;
- promote awareness and widespread responsibility, supporting the active involvement of all recipients of the Anti-Corruption Management System.

It applies to employees, management and Corporate Bodies of FiberCop; subsidiaries and/or investee companies; third parties such as customers, suppliers and consultants; certification bodies.

All Company departments are considered potentially at risk. In particular, following the Anti-Corruption Risk Assessment, the following departments were identified: Sales, Procurement and the departments that interact with the Public Administration (External Relations, Strategy, Regulatory Affairs, Technology & Operations). Adopted by the Board of Directors in November 2024, the Policy is subject to periodic review and updating, so as to ensure continuous

Code of Ethics

Optics Holdco Group



alignment with regulatory requirements, international standards and the evolution of best practices.

9 FiberCop guarantees the maximum dissemination of the Anti-Corruption Policy, ensuring that it is understood and implemented by all recipients; for this purpose, it is made available on the institutional website and on the Company intranet or through specific communication initiatives. In addition, FiberCop requires all employees to complete a mandatory Anti-Corruption training program. The Policy is made known to all those who have contractual relationships with FiberCop.

7 Management of Conflicts of Interest. FiberCop recognizes the importance of ensuring a transparent and accountable operating environment, in which business decisions are made exclusively in the interest of the organization and its stakeholders. This includes the procedure dedicated to the prevention and management of conflicts of interest, designed to promptly identify any situation that could affect the integrity of decision-making processes.

8 The procedure defines a clear and structured reference that allows to support and protect the people involved, promoting an approach based on

maximum transparency. It applies to all FiberCop corporate departments, ensuring homogeneous and consistent application of the rules for managing the risk of conflict of interest. The latest version of the procedure was approved by the Chief Compliance Officer and published on 28 November 2025, further strengthening the company's commitment to ethical and responsible governance. **9** To ensure full understanding and dissemination, FiberCop provides employees with dedicated training courses, divided into modules, activities and specific initiatives.

The document is also available on the Company intranet, so as to ensure immediate access and encourage informed and compliant behavior by all staff.

7 The key elements of FiberCop's approach to defining, managing and promoting its principles of conduct and corporate culture are based on the set of policies and ethical safeguards adopted by the Group. In particular, the Code of Ethics, the Human Rights Policy, the Environmental Policy and the policies dedicated to the management of relations with the supply chain — including the Supplier Code of Conduct — represent the fundamental references through which FiberCop directs behaviors, decisions and responsibilities along the entire value chain.

8,9,10a,c,e,g,h The following table explains the requirements for all the documents of the FiberCop Governance system.

FIBERCOP ETHICAL AND INTEGRITY GOVERNANCE

Document	ESRS requirements	Content and purpose	Recipients	Owner	Approval	Document update frequency	Communication to stakeholders and controls
Code of Ethics	G1-1 7,9	It defines principles, values, standards of conduct, integrity, transparency, responsibility and respect; ethical business discipline; commitment to stakeholders; prevention of illegal behavior.	All FiberCop people, Corporate bodies, Supervisory body, collaborators, consultants, suppliers and partners.	Compliance / HRO	BoD	Periodical, on BoD decision	Intranet, institutional website, training
Organisational Model 231	G1-1 7,8,9	Crime prevention frameworks and administrative liability; defines processes, controls, protocols, responsibilities, areas at risk; awareness of criminal and administrative risks.	Employees, Corporate bodies, posted workers, suppliers, agents, consultants, professionals, business partners.	Supervisory body, Compliance	FiberCop Board of Directors with Supervisory body opinion	Periodic, based on regulatory requirements	Intranet, 231 training, Supervisory Body supervision
ISO 37001 Anti-Corruption Management System	G1-1 7,8,9	Certified system to prevent and combat active and passive corruption; defines roles, responsibilities, processes, audits; Identify risky operations and roles.	Employees, management, Corporate bodies, third parties, customers, suppliers, consultants, certification bodies.	Compliance, Ethics and Compliance Committee	Governed by the Board of Directors, certification by external body	Annual (ISO audit)	Internal/external audits, training, reporting
Anti-Corruption Policy (an integral part of the Anti-Corruptionsystem)	G1-1 7,8,9	It defines principles, obligations, prohibitions, and anti-corruption prevention measures; regulates conduct and relationships with third parties; and protects the Company's reputation.	Employees, management, Corporate bodies, subsidiaries/affiliates, third parties, consultants.	Compliance	BoD FiberCop	Periodic review, updates when necessary	Intranet, website, communications, whistleblowing.
Conflicts of Interest Procedure	G1-1 8,9	It defines the criteria for the prevention, reporting and management of conflicts of interest; it protects the impartiality of decisions and transparency.	All Company departments; employees	Chief Compliance Officer	Approved by CCO	Upgrade at CCO discretion	Intranet, dedicated training
Environmental Policy	E1, E5, G1-1	Environmental commitment, governance and risk/opportunity management; value chain; double materiality.	FiberCop and value chain	Sustainability	BoD (Informative)	Periodic updating	Institutional website, intranet, training to ambassador's cluster
Human Rights Policy	S1, S2, S3, G1-1	Commitments and duties along the value chain towards people and communities; due diligence and governance.	FiberCop and value chain	Sustainability	BoD (Informative)	Periodic updating	Website, intranet, training, Building Network
Health & Safety Policy	S1, G1-1	Injuries prevention, continuous training, responsibility and governance (ISO 45001).	Entire organization, workers and third parties involved	HSE	Top Management approval	Review at least annually	Intranet, mandatory training, audits
Human Resources and Equal Opportunities Policy	S1, G1-1	Inclusion, equal opportunities, development, welfare, remuneration policies, privacy-by-design.	FiberCop people and job interview candidates	HRO / Steering Committee Gender Equality	Steering Committee Gender Equality approval	Periodic updating	Intranet, HRO communications, training

FiberCop's governance and compliance system. It guarantees FiberCop's governance and compliance system. It guarantees a unified and consistent approach to the management of regulatory risks and expected behaviour within the Company. It is overseen by the department that reports to the Chief Compliance Officer.

7 The Privacy model is also part of this framework, designed to ensure the correct application of the GDPR and the protection of the rights of data subjects throughout the entire life cycle of the data. FiberCop's Privacy model is based on structured governance, which provides for the presence of Internal Privacy Delegates (DIP), responsible for the operational implementation of GDPR measures in their respective departments. The model includes the presence of a box dedicated to the DPO, through which data subjects can exercise their rights and request clarifications: this safeguard guarantees a direct, tracked and compliant channel for the management of privacy requests. The picture is also completed by the presence of an additional e-mail box dedicated to internal communications relevant to privacy purposes. The model includes the preparation and updating of the Register of Processing, the continuous monitoring of the legislation and the management of procedures regarding personal data breaches. Mandatory continuous training on privacy legislation is also

central, accompanied by dedicated courses. The model is completed by the definition of internal processes, information flows and organisational measures to oversee the correct application of the GDPR to the business context. The Privacy Supervisory Unit is located within the Legal Governance, Processes & Analysis department within the Strategy Office and is connected with all the relevant corporate departments for support and compliance activities with the model.

7 FiberCop adopts a Human Rights Policy that protects the dignity, integrity and respect of the person in all Company activities and along the value chain. As the Country's leading infrastructure operator, FiberCop recognizes respect for Human Rights as the foundation of freedom, justice and peace and integrates these principles into its Code of Ethics and all relevant policies with application along the entire value chain. The Policy defines the Company's commitment to protect and promote fundamental Human Rights – including the right to life, health, safety, non-discrimination, freedom of association, decent working conditions and the protection of vulnerable groups – ensuring their application in the Company's daily operations and relationships. This commitment also extends to rights enabled by digital infrastructure, such as the right to access technologies and freedom of expression, ensured through constant and transparent dialogue

with stakeholders. Through the Supplier Code of Conduct, FiberCop transfers its commitment and the contents of the Policy to suppliers, also through the activities of the Building Network program described in S2. FiberCop people with crucial roles in the field of Sustainability, Compliance, HRO are supported with targeted courses on Human Rights issues, also in consideration of their role in constant monitoring of the issues. **9** The Policy applies to the entire workforce and value chain, without exclusion, and provides for specific measures to protect the most exposed groups. It is applied in Italy, the only context in which FiberCop operates directly, but directs behaviors and responsibilities along the entire supply chain.

Responsibility for implementation is entrusted to the Chief Human Resources Officer, the Sustainability department, the Compliance department and the Management Committee through a shared and cross-departmental governance model that ensures oversight, consistency and integration of sustainability issues in corporate decisions. Managerial performance is also evaluated with respect to the ability to contribute to the dissemination of the culture of Human Rights and their concrete protection in daily operations. It is fully compliant with the recognized international instruments on Human Rights and labour and from 2025, with the principles of the United Nations

Global Compact, signed by FiberCop. The definition and evolution of the Policy take into account the interests of the main stakeholders, through processes of double materiality analysis, dialogue with trade union representatives, community involvement, comparison with suppliers and institutions and periodic surveys conducted through listening tools. The Policy is made available through the institutional website, the Company intranet, contractual documentation, dedicated training and is associated with the whistleblowing system, accessible to employees, former employees, business partners and suppliers. It is punctually referred to in FiberCop's Code of Conduct for Suppliers. It is also subject to periodic review by the relevant departments and was shared with the Board of Directors in July 2025.

7 FiberCop's Environmental Policy represents the Company's formal commitment to the responsible management of the environmental impacts generated by its activities and along the entire value chain. It is an institutional document that defines FiberCop's strategic positioning on environmental issues. It reflects an integrated vision according to which environmental sustainability is an enabler of industrial strategy and an essential element of competitiveness, innovation, resilience and long-term value creation. It establishes the Company's general environmental objectives, affirming the

desire to reduce the ecological footprint of its activities and the value chain, mitigate the impacts of climate change, protect biodiversity and promote an efficient and circular use of resources. In this framework, FiberCop is committed to integrating the environmental dimension into the design, management and evolution of network infrastructures, directing activities towards energy efficiency criteria, transition to renewable sources and the adoption of less impactful technologies. The Company adopts specific management processes and systems, which include the definition of targets departmental to the achievement of the plan objectives, monitoring through dedicated indicators and periodic evaluation of the effectiveness of the actions implemented, with the possibility of activating corrective measures when necessary.

9 The Environmental Policy has a Scope of application to cover all of FiberCop's operational activities, its workforce and the entire value chain. In fact, it concerns not only the Company departments directly involved in the management of infrastructure assets, but also external workers and suppliers who, in various capacities, contribute to the creation, maintenance and innovation of the national network. The Policy requires that the principles defined in it are also understood and implemented by the players in the supply chain, with particular attention to sectors with greater

environmental exposure. The territorial scope coincides with the national operational perimeter of the Company, the only Country in which FiberCop directly carries out activities.

Responsibility for the implementation and supervision of the Environmental Policy is attributed to the Chief Corporate Officer responsible for corporate ESG governance, coordination of the Sustainability departments, among others, and the integration of environmental objectives into FiberCop's strategic guidelines. The document is drawn up by Sustainability, verified by Legal, Compliance, HR, Procurement and Technology & Operations, and formally notified the Board of Directors for disclosure, thus ensuring an adequate level of supervision by Top Management. The Environmental Policy is part of a regulatory and value framework consistent with internationally recognized instruments, in particular SDGs, Global Compact, UN/ILO tools and ESRS to guide the identification and monitoring of impacts, risks and opportunities.

The process of defining the Environmental Policy took into account the interests and expectations of the main stakeholders, integrating the results of the double materiality analysis conducted involving the workforce, suppliers, institutions and communities. The involvement of the value chain and operational departments was essential to ensure an approach

that adhered to the needs of the business and was consistent with the impacts identified. The consultation activities were part of the broader framework of sustainability governance, which provides for moments of structured discussion between the corporate departments and the Management Committee.

Finally, the Policy is made available to all stakeholders through the institutional website and intranet, as well as through communication and training initiatives dedicated to the internal population and the supply chain. The Company also adopts listening tools and reporting channels accessible to employees, suppliers and partners, which allow it to support the correct application of the Policy and intercept any critical issues or proposals for improvement.

FiberCop's Environmental Policy is a central element of the Company's ESG governance: it defines a clear strategic framework, identifies precise responsibilities, establishes management criteria and guides behaviors and decisions, ensuring consistency with current legislation, international standards and the objectives of decarbonization and sustainable development to which FiberCop contributes through its infrastructure role. **9** It is part of FiberCop's annual training plans.

The Code of Ethics and the policies underlying FiberCop's ESG Governance are available at the

following link: <https://www.fibercop.com/en/about-us/governance-system/>

10a The Company makes the Whistleblowing channel available, through a dedicated IT portal accessible from internet, through which it is possible to report conduct contrary to laws and regulations, the Code of Ethics, the 231 Organisational Model, as well as the system of Company rules and procedures. Thanks to the active and responsible participation of the Company population and third parties, reporting any non-compliant behavior, the Company is allowed to identify any irregularities and promptly adopt the necessary corrective measures, preventing any economic or reputational damage. In particular, a specific category is made available on the aforementioned portal, which allows you to report on illegal behavior that contributes to aggravating climate change and the communication of untruthful information on the subject.

Anyone with a legitimate interest in the Company's activities can send, through the aforementioned portal, a report, even anonymously: employees, former employees and job candidates, partners, customers of the Company, as well as - but not limited to - partners, suppliers (including under contract/subcontracting), consultants, collaborators in the performance of their work. The report must be adequately substantiated, i.e. it must contain sufficient details to allow the

reported facts to be ascertained (e.g. elements that allow the identification of the subjects involved, the context, place and time period of the reported facts and supporting documentation). Any reports that do not fall within the scope of the whistleblowing procedure will be considered irrelevant and subject to immediate closure. By way of example, commercial complaints and disputes or requests related to personal interests for which additional dedicated channels are available are not included in the relevant reports.

10ci A report can be sent by:

- the whistleblowing portal, suitable for guaranteeing the confidentiality of the identity of the person making the report. At the end of the entry, the portal provides a Unique Identification Code that allows you to check the status of processing and to send and receive communications, anonymously, relating to the report made;
- the voicemail to the toll-free number 800.86.11.86;
- through direct contact with the staff of the Compliance department, to be requested through the IT portal.

Anyone who receives a report, in any form (written or oral), must send it promptly, and in any case within 7 days of receipt of the same, to the Compliance

department through the aforementioned channels. Reports are handled in compliance with applicable laws and Company procedures. In particular, please refer to the Institutional Document "Whistleblowing". This document is also published on the FiberCop reporting portal.

The person submitting the report, those supporting the process and the parties involved are guaranteed absolute confidentiality about the identity of the whistleblower. **10cii** It is forbidden to carry out retaliatory acts against the whistleblower, understood as any behaviour, act or omission, even if only attempted or threatened, carried out as a result of the report, which causes or may cause the whistleblower, directly or indirectly, unjust damage. Those who believe they have suffered retaliation due to the report can report it to the National Anti-Corruption Association (ANAC) according to the channels specifically set up by the latter.

The owner of the report management process is FiberCop's Compliance department, whose members are equipped with the necessary reporting management skills, including through dedicated training. The department is also responsible for the diligent execution of all the activities entrusted to the manager of the internal reporting channel, pursuant to Legislative Decree 24/2023.

For the in-depth analysis of specific reports, the Compliance department may also make use of

the support of personnel from other Company departments (so-called Investigators) and, if necessary, of external professionals, in compliance with the principle of data confidentiality, in order to ensure a faster and more effective resolution, thanks to the specific know-how of the person involved from time to time.

10ci All subjects involved in the process of managing reports, including the so-called Investigators and any external professionals, are duly appointed with regard to the processing of personal data and are bound by confidentiality obligations. The Investigators were appointed and trained by Compliance during 2025. In the second half of 2025, numerous initiatives were carried out in favor of FiberCop people, with the aim of informing about the new whistleblowing process.

In particular, a massive communication on the new whistleblowing process was disseminated and, subsequently, an e-learning training video was provided to all staff.

The dedicated intranet page with the context and the link to the reporting portal is available for all employees.

The Whistleblowing Institutional Document containing details on the management of reports is available directly on the reporting portal.

The confidential Organizational Document on the Management of Whistleblowing Reports has

been drawn up – which governs the process of transmission, receipt, analysis and management of reports. The document also describes the operating rules for the correct management of a report and in particular: the protection of the identity of the whistleblower, the protection measures and the processing of personal data and the storage of documentation.



G1-2 Management of relationships with suppliers

15 FiberCop promotes responsible, transparent and sustainable management of relations with its suppliers, basing the entire procurement process on principles of integrity, ethics and respect for Human Rights. The policies and safeguards adopted by the Company - in particular the Code of Ethics, the Human Rights Policy, the Environmental Policy and the Supplier Code of Conduct - define the behavioral expectations of the Company to its supply chain. These tools require suppliers to adopt organisational systems consistent with the principles of legality, fairness, transparency and protection of people, strengthening a corporate culture oriented towards responsibility throughout the value chain.

FiberCop requires its business partners to operate in full compliance with the prohibitions of corruption, bribery, fraud, extortion and unfair practices; to manage conflicts of interest in a transparent manner; to protect data and information according to the GDPR; and to ensure traceability, integrity and collaboration in audit processes. The relationship with suppliers is, therefore, based on the principles of equity, accountability and reciprocity, fundamental

elements for the continuity and sustainability of the business.

FiberCop's supply chain governance begins with the responsible selection of suppliers, is based on rigorous supply chain management and monitoring processes and develops through operational and infrastructural activities that generate value for customers and communities. It is supported by solid ESG policies and systematic stakeholder involvement and is articulated in a model aimed at generating positive impacts and minimizing social, environmental and reputational risks. FiberCop maintains constant relationships with its suppliers through meetings and meetings aimed at sharing opportunities and synergies and guiding and supporting the supplier in aligning with the ESG targets for FiberCop's strategic guidelines, shared through the Supplier Code of Conduct which from 2025 is included as a necessary contractual clause. On the criteria for choosing suppliers, see also what is reported in S2-4.

FiberCop's initiatives for a responsible supply chain go under the Building Network program launched in November 2025, in which the integration of ESG values is a fundamental pillar. The program defines an operating model based on shared leadership, continuous training and active involvement of the supply chain, with KPIs related to health,

safety, inclusion and working conditions as well as indicators on decarbonization plans. FiberCop also promotes a culture of integrity through awareness-raising initiatives aimed at suppliers, provided for in the Supplier Code of Conduct, which requires partners to adopt high standards in terms of ethics, Human Rights and anti-corruption. These requirements act as a lever to direct the supply chain towards responsible behavior aligned with corporate values.

The November event was attended by approximately 290 FiberCop suppliers/partners. During the meeting, the Company's Top Management outlined the key points of each FiberCop department and the Head of Sustainability presented the highlights of the ESG strategy, with a particular focus on the role of the supply chain, reiterating the strategic importance of sustainability in their work. Following this moment of general engagement, the project includes a series of collaborative activities with the Company's main strategic suppliers in order to develop a strategy for measuring and subsequently reducing their emissions.

FiberCop has developed an internal structured oversight to monitor suppliers' adherence to its value principles, with the possibility of defining improvement plans.

G1-3
Prevention and detection of bribery and corruption

Through constant monitoring and supervision tools, FiberCop is committed to combating all forms of corruption, active and passive, direct and indirect, involving the Company's staff and any person who carries out activities in its name and on its behalf.

FiberCop also guarantees compliance with current regulations, both in relations between private individuals and towards the Public Administration, observing the safeguards contained in the 231 Organizational Model. To strengthen this commitment, FiberCop has adopted an Anti-Corruption management system, of which the Anti-Corruption Policy is an integral part. This system - aimed at preventing, detecting and fighting phenomena related to corruption - is certified by an external body accredited in accordance with the ISO 37001 standard.

In addition, FiberCop is committed to continuously improving its Anti-Corruption Management System in accordance with the highest international standards and guarantees the authority and independence of the Compliance department for the prevention of corruption and

the resources attributed to it. The Anti-Corruption Policy represents the fundamental component of a broader system of business ethics and internal control, as already mentioned.

18a In line with the initiatives aimed at increasing attention to the issues of ethics and behaviour, FiberCop has adopted an Anti-Corruption Due Diligence manual, a specific procedure which defines the methods to be followed to prevent and manage situations of conflict of interest, in addition to the aforementioned whistleblowing.

FiberCop communicates its policies through different channels: publication on the internal digital document management system, emails sent to all employees, publication on the Company intranet, on the Compliance website, on the Corporate website, and by including references to the policies in contract terms and purchase orders.

18c FiberCop's Anti-Corruption Management System provides for annual reviews by the bodies responsible for governing the System itself (the Ethics and Compliance Committee representing management and the Board of Directors as the Governing Body).

The Corruption Prevention (Compliance) function periodically reports the results of the monitoring and implementation of the activities required by the system on a quarterly and annual basis.

21 E-learning training is mandatory and covers the Anti-Corruption Management System and the main reference tools: Code Of Ethics, Anti-Corruption Policy, management of resources in a relevant position, conflict of interest management and whistleblowing. The departments potentially considered at risk of corruption are all corporate departments. The training of Anti-Corruption courses (Conflict of Interest, Anti-Corruption Management System, Code of Ethics, 231 Organizational Model and Whistleblowing) is therefore provided with a target of "all employees". In 2025, training courses were provided to 15,624 people, over 85% of the total employees. **21c** FiberCop is certified for its Anti-Corruption Management System in accordance with ISO 37001, which provides training and information activities aimed at administrative, management and control bodies.

G1-4
Confirmed incidents of corruption or bribery

24 No cases of active or passive corruption are reported. In 2025 there have been no convictions, fines or actions taken against violations of Anti-Corruption rules and procedures.

G1-5
Political influence and lobbying activities

Institutional dialogue, regulatory advocacy and participation in public consultations are essential safeguards against material non-compliance risks for FiberCop. They enable the Company to:

- mitigate regulatory and compliance risks, which are highly relevant for a wholesale-only operator whose business model depends on the regulatory framework (e.g. Digital Networks Act, regulations on digital networks);
- reduce reputational risks by ensuring transparency, integrity and alignment with the principles of the Code of Ethics, Model 231 and Anti-Corruption Policy;
- contribute to generate positive impacts on the Country's digitalisation and the development of critical infrastructure, in line with the outcomes of the FiberCop business model;
- seize strategic opportunities, including strengthening institutional positioning, access to regulatory technical committees and the possibility of contributing to the definition of public policies relevant to the sector.

29a The development and consolidation of institutional relations represent an essential strategic

objective for FiberCop to ensure the correct representation of the Company's position in the European, national and local legislative framework.

FiberCop, as a leading wholesale-only operator in the telecommunications sector, plays an active role in dialogue with the Institutions, in order to provide its contribution to the definition of public policies in the sector, also thanks to its industrial experience and coverage of the territory. The activities of the Public Affairs department include the responsibility of defining and representing FiberCop's positions vis-à-vis international, national, regional and local institutions and bodies, as well as at Confindustria, Trade Associations and related Confederations.

The department also ensures the supervision of the processes of drafting regulations on issues of potential interest and impact for the Company.

These issues concern, on the one hand, the business environment in general — with particular reference to the areas of taxation, labour and energy costs — and, on the other hand, sector-specific aspects relating to dossiers on the development of digital networks. The Company is mainly committed to the latter, in line with the objectives of the European Digital Agenda and the PNRR, as well as with the regulations in progress aimed at modernising the legal framework of Italian and European connectivity, such as the Digital Networks Act. Finally, the structure maintains

a constant dialogue with think tanks, sectoral bodies and strategic stakeholders, carries out advocacy activities in the field of Public Affairs and operates in departmental coordination with the Brussels office.

29c The work of dialogue with the institutions is also carried out through participation in public events, parliamentary conferences and regulatory discussion tables, as emerged from the activities carried out by FiberCop in the areas dedicated to the regulation of digital networks and the development of the wholesale-only model, in the context of the future implementation of the Digital Networks Act within the national legislative framework. These activities allow the Company to actively contribute to the national debate on digital infrastructures, network governance and the competitiveness of the sector, bringing the technical experience gained in the construction and management of the fibre network.

29b All relations with Bodies, Institutions and Associations are managed in accordance with the Code of Ethics, the Anti-Corruption Policy and the governance model provided for by Legislative Decree 231/2001, ensuring full compliance with current regulations, the principles of transparency and the highest international standards on integrity and accountability.

FiberCop, in line with the Code of Ethics, does not provide for any form of contribution, direct or indirect, to political parties, movements,

committees or political and trade union organizations, including through sponsorships or donations. Participation in public consultations and regulatory processes takes place in an open and verifiable manner, in line with national legislation (including Legislative Decree 231/2001) and with the transparency codes applicable to discussions with the European institutions.

In 2025, FiberCop incurred membership expenses of approximately 1,8 million euros, including membership fees of Confindustria system, as well as contributions for think tanks and strategic analysis bodies.

These charges are related to participation in

institutional tables, category representation activities and support for technical in-depth and Policymaking initiatives.

29d FiberCop is registered in the Transparency Register updated by the Interinstitutional Agreement of 20 May 2021 between the European Parliament, the Council of the European Union and the European Commission on a mandatory transparency register and has signed the Code of Ethics attached to it.

30 FiberCop does not have members of the administrative, management and control bodies who held comparable positions in the Public Administration in 2023 and 2024.

G1-6 Payment Practices

33a The standard payment conditions are, for supplies, tasks and services, 120 days from the invoice date at the end of the month (with the payment terms starting from the date of delivery of the goods or authorization for invoicing for services) and are subject to change following negotiation, so they may vary for each contract. Certain categories of services are specifically managed, for which the standard payment conditions are derogated in relation to specific legal requirements.

FiberCop does not rely on a significant number of SMEs.

The average time for payments is 127.5 days.

33b In the financial year 2025, 82,875 payment orders were made to suppliers for a total of 3.8 billion euros.

Percentage of payments aligned with standard payment terms is 2%.

33c,d In 2025 FiberCop was not involved in any legal proceedings for late payments.

FINANCIAL CONTRIBUTIONS AND MEMBERSHIP FEES	Euro
Politicians and political parties	-
Confindustria Associative System	1,710,747
Other Associations	91,250
Total	1,801,997



Environmental Information

Climate Change

ESRS E1

↳ ESRS 2 SBM-3

Material impacts, risks and opportunities and their interaction with the strategy and business model

18 During 2025, the ERM department identified extreme natural events as a significant physical risk to corporate assets in both the short and long term.

19a,b The analysis conducted covered the Company's operational scope and focused on the physical assets directly managed, including 33 Points of Presence (POPs), 47 buildings, and, for the network - both underground and overhead - an analysis across the 20 Italian regions.

The objective of the analysis - conducted according to the methodology described below - was to assess the exposure of assets to physical risks related to climate change using climate scenarios for 2030, 2040, and 2050 and considering a wide range of acute and chronic hazards recognized by the EU Taxonomy, including heat waves, extreme precipitation, floods, wildfires, landslides, coastal erosion, and subsidence.

19c The analysis revealed that:

- there is increasing exposure to physical risks across all time horizons analyzed, with particular intensification of wildfires, rain-induced landslides, extreme precipitation, and floods;
- fires and floods are the most significant risks for physical damage, due to their extreme and potentially destructive nature;
- climate scenarios show that intense rainfall events and wildfires tend to occur across all timeframes (2030–2040–2050), indicating a long-term persistence of the risk;
- the infrastructure is vulnerable to floods, sea level rise, subsidence, and wildfires, with potential impacts on service continuity and the stability of local infrastructure;
- floods and landslides generate more immediate and severe impacts, specifically regarding health and safety risks.
- emerging physical risks could lead to increased capex (repairs, reinforcements, adaptation measures) and reduced revenues due to potential downtime of affected assets.

Finally, it was found that climate-related risks affect both FiberCop's own operations and its supply chain. Thanks to the analyses carried out and the systematic use of climate scenarios, the Company is increasingly integrating climate risk into its decision-making processes.

↳ ESRS 2 IRO-1

Description of the processes to identify and assess material climate-related impacts, risks and opportunities

20a In the process aimed at identifying current and potential climate impacts, FiberCop started from the drivers of its FiberCop's strategic guidelines to define areas and activities with current and prospective impact on the topic of climate change and decarbonization. FiberCop has defined a structured process to identify and manage negative impacts on the climate, with reference to greenhouse gas emissions. The Company carries out a systematic screening of its operational, infrastructure and value chain activities to identify current and potential

sources of emissions, which derive mainly from operational and maintenance activities and network components and technological equipment used.

The process is integrated with a structured decarbonization plan, which includes the technological evolution of the fiber optic network, the modernisation of exchanges and facilities, EnerCop's plan for the installation of photovoltaic systems to increase supply from renewable sources, and fleet electrification, also involving the supplier chain on ESG issues.

20c In terms of opportunities, the analysis has been extended to the activities of EnerCop, identified by the HoldCo Group as an upstream possibility of development in the field of renewable energy in synergy with FiberCop's physical assets; EnerCop plays a leading role in FiberCop's decarbonization process.

The analysis also made it possible to identify the timing with which the main actions will be fully operational within the decarbonization plan. The results of the work conducted at the turn of 2024 and 2025 have made it possible to obtain the validation of Net-Zero targets by Science Based Target Initiative (SBTi): in particular, on 10 July 2025, SBTi officially approved that FiberCop's direct and indirect CO₂eq emissions reduction targets (Scope

1, 2 and 3) are aligned with the reductions required to keep global warming below 1.5°C.

21 Scientific references such as IPCC reports¹ use the deadlines below to guide policies and predict climate evolution on different time scales. In particular:

- short term - 2030, coincides with the goals of the Paris Agreement, which aims to limit global warming to below 1.5°C compared to pre-industrial levels;
- medium term - 2040, short-medium term scenario, in which the effects of current actions on emissions will be seen;
- long-term - 2050, the date by which many countries aim to achieve carbon neutrality.

20bi,bii With reference to risk analysis, FiberCop has defined and implemented a structured process for the identification and assessment of physical risks related to climate change that may affect its operations. This process constitutes a dedicated component within the broader Enterprise Risk Management (ERM) framework; the results of the physical risk analysis feed into the overall business risk profile, integrating with existing risk assessment, monitoring, and management processes.

The analysis foresees, as already mentioned, the identification of relevant climate hazards through an

assessment based on the 28 hazards defined by the EU Taxonomy, classified into acute phenomena (heat and cold waves, extreme rainfall, floods, landslides, storms, fires) and chronic (increase in average temperatures, water stress, sea level rise, coastal erosion, subsidence). The exercise makes use of historical and projected climate data from recognized models, integrated by national studies for phenomena not adequately represented in global datasets.

In the second phase, the process assesses the level of exposure of the Company's assets and activities to the identified hazards. For each Company asset deemed relevant, it is characterized by a level of vulnerability-operational, health and safety and financial-which, combined with the expected severity of the phenomena in the different climate scenarios, allows an assessment of the gross physical risk to be defined. This assessment makes it possible to identify the most exposed assets, highlight territorial recurrences and define priorities for future risk treatment actions.

21 The analysis of climate scenarios has been used to systematically guide the assessment of physical risks along the three reference time horizons:

- 2030 (short term),
- 2040 (medium term),
- 2050 (long term).

¹ Intergovernmental Panel on Climate Change.

The comparison was conducted between two scientifically recognized scenarios:

- SSP12.6,
- SSP58.5

developed from CMIP6 climate models² and ISIMIP datasets³, and integrated with specific indicators for each relevant phenomenon (temperatures, heat stress, heat and cold waves, intense rainfall, fires, landslides, floods, water stress, sea rise, coastal erosion). For phenomena not adequately represented in global models - such as storms, tornadoes, subsidence or coastal erosion - the analysis used national studies such as those of ISPRA⁴ and CMCC.⁵ Applied to the main 100 assets/ areas subject to assessment (POPs and buildings through punctual geolocation and lines through regional analysis), the scenarios made it possible to observe how the probability and intensity of hazards change over time. This made it possible to distinguish between:

- immediate risks (such as extreme rainfall),
- increasing risks (such as landslides and fires),

² CMIP6: Coupled Model Intercomparison Project.

³ ISIMIP: Inter-Sectoral Impact Model Intercomparison Project.

⁴ ISPRA: Istituto Superiore per la Protezione e la Ricerca Ambientale (Higher Institute for Environmental Protection and Research).

⁵ CMCC: Centro Euro-Mediterraneo sui Cambiamenti Climatici (Euro-Mediterranean Center on Climate Change).

- long-term structural risks (such as sea level rise and subsidence).

The scenario analysis therefore supports the identification of the areas of greatest vulnerability and also provides useful indications for reflecting in perspective on opportunities and potential transition risks related to climate change, contributing to the progressive integration of climate risk into the decision-making processes and strategic planning of the Company.

↳ E1-1

Transition plan for climate change mitigation

FiberCop, aware of the impact of its activities on climate change, has defined the contents of its strategy by including ambitious environmental targets. The actions related to the plan and the related financial resources aim to target the organization towards the Net-Zero emissions goal, validated by SBTi in July 2025, with the short and long-term targets set out below.



NET-ZERO EMISSIONS TARGETS (BASE YEAR 2023)

Target	Near-Term		Long-Term		Net-Zero
Scope 1 + 2	-70%	2030	-90%	2040	2050
Scope 3			-90%	2050	
<i>Scope 3 - cat.13</i>	<i>-70%</i>	<i>2030</i>			
<i>Scope 3 - cat.1+2</i>	<i>41%</i>	<i>2029</i>			

16a Targets validated and approved by SBTi in July 2025 are composed as follows:

- overall Net-Zero Target: FiberCop commits to reach Net-Zero greenhouse gas emissions across the value chain by 2050.
- Near-Term Targets: FiberCop commits to reduce absolute Scope 1 and 2 emissions 70% by 2030 from a 2023 base year; FiberCop S.p.A. also commits to reduce absolute Scope 3 emissions from downstream leased assets 70% within the same timeframe. The Company further commits that 41% of its suppliers by emissions, covering purchased goods and services and capital goods, will have science-based targets by 2029;

- Long-Term Targets: FiberCop commits to reduce absolute Scope 1 and 2 emissions 90% by 2040 from a 2023 base year. FiberCop also commits to reduce absolute Scope 3 emissions 90% by 2050 from the same base year.

16b Obtaining SBTi validation is part of an articulated decarbonization plan that involves the entire perimeter of FiberCop and which sees the establishment of EnerCop as the most concrete expression of the Company's climate-related opportunities.

Main actions:

- decommissioning of the copper network with migration to new generation fiber optic technologies, more energy efficient;
- asset modernisation: interventions on exchanges and cooling systems to reduce consumption;
- Power Purchase Agreement (PPA) and installation of photovoltaic systems for the use of 100% energy from renewable sources;
- rationalization and electrification of the Company fleet;
- involvement of the value chain through a structured path on ESG issues.

The results achieved by FiberCop in 2025 significantly exceed the emissions reduction trajectory envisaged in the decarbonization plan for the year, attesting to progress well beyond the expected targets.

In particular, Scope 1+2 emissions were reduced by 36% compared to the base year identified for validation, while for downstream assets (cat 13 Scope 3) the reduction of 65% was achieved at the end of 2025 vs 2023. The precise data for 2025 are reported in E1-6.



Decommissioning. Among the main current and future mitigation efforts implemented by FiberCop, decommissioning activities represent the engine of the energy transition process, as they enable the structural and progressive reduction of energy consumption, the elimination of the most emitting legacy technologies and the migration to a more efficient, resilient network infrastructure fully consistent with long-term decarbonization objectives.

The decommissioning of legacy network that

uses copper cables for access to services, allows FiberCop to achieve energy savings, enable the extraction of copper which becomes a secondary raw material, recover technological infrastructure and finally achieve the reduction of space (compaction), releasing and enhancing the properties no longer departmental to the core business. The enhancement of copper is a positive effect of the switch off and is described in E5. FiberCop's decommissioning plan involves 10,500 exchanges and provides for the overcoming, over the course of a multi-year plan, of

the primary copper network attested to them.

In particular for

- 6,800 bypass exchanges, a complete switch-off is planned with the return/sale of the property;
- 3,700 PoP (Point of Presence) exchanges for which the legacy components are expected to be shut down: the hosted optical component remain; these plants will constitute FiberCop's infrastructure when fully operational.

The Italian Communications Authority (AGCOM) plays a central role in this process and regulates the decommissioning of copper exchanges through specific resolutions⁶. In this regulatory framework, FiberCop has presented a multi-year plan that provides for the gradual shutdown of legacy infrastructures and the definitive transition to the fiber network: it is about 2.5 million legacy lines, with different types of technology. The spread of the FTTx access network and the progress of the Country's digitalisation have made it possible to accelerate the decommissioning plan for copper exchanges, thanks also to technological solutions that allow migration to be carried out without any impact perceived by the end customer, through a completely transparent technical migration. This evolution allows FiberCop to anticipate the timelines set by AGCOM and to accelerate the reduction of energy consumption,

⁶ AGCOM resolutions: 34/21/CONS, 238/23/CONS, 458/24/CONS and 123/25/CONS. During 2024-2025, 62 exchanges were decommissioned in accordance with Resolution 34/21/CONS.

generating concrete benefits for the environment. Asset modernisation. Following the gradual switch-off of the copper network, FiberCop has launched a structured program to modernize infrastructure assets, aimed at renewing the power supply and air conditioning systems of the plants that will remain within the Company perimeter.

The plan, with the first operational implementation scheduled for 2026 and a four-year horizon, will affect the approximately 3,700 exchanges that will remain operational downstream of the switch-off of the legacy network.

The switch-off is a key enabler of the program, allowing investments to be focused on strategic infrastructure and maximizing energy efficiency.

The initiative will help to:

- structurally reduce energy consumption;
- increase resilience and business continuity;
- support the Company's decarbonization path.

When fully operational, the program will generate an estimated saving of about 200 GWh/year, with a consequent reduction in indirect CO₂eq emissions.

16c,e With FiberCop's 2025-2027 strategic guidelines disclosed to the market, FiberCop envisages commitments of €8.5 billion, of which a significant portion (between 13% and 18%) will be for decommissioning and IT. This ranges from €1 to €1.5 billion, related almost to the transition plan for climate change mitigation, in addition to further operating costs related to asset modernisation, an activity carried out by EnerCop for FiberCop. It should be noted that a detailed analysis of the KPIs for alignment with taxonomy in relation to the transition plan has not yet been formalised.

PPA and installation of photovoltaic systems. As part of its decarbonisation strategy, FiberCop procures renewable electricity through EnerCop thanks to a PPA signed with ERG7 until 2031, which represents, for 2025, the Company's main source of green energy.

Digitalisation and IoT monitoring

In line with the new post-switch-off infrastructure structure, in the third quarter of 2025, in partnership with Microsoft, the definition of the digital architecture to support the monitoring of consumption and infrastructure alarms of the exchanges was launched.

The IoT project will enable:

- punctual measurement of consumption;
- objective validation of energy savings;
- continuous monitoring of performance;
- data-driven decision support for energy optimization;
- predictive maintenance analysis and optimization of technical interventions;
- improved resilience and continuity of service.

Full industrial implementation is planned from 2026.



7 <https://www.erg.eu/it/home>

The contract provides for a theoretical annual availability of 540 GWh, most of which is designed for FiberCop. Renewable energy procurement costs are part of the Company's operating costs. In the emission reduction plan, the most massive intervention on the electrification of the fleet is expected after 2030 as the new multi-year contracts, on a significant share of the current fleet (8,975 vehicles), were finalized at the same time as the birth of the current FiberCop (July 2024), in advance of the analysis conducted for the Net-Zero plan subject to SBTi validation. The durations of the contracts signed during 2024 are between 6 and 8 years; In 2026, no contracts are expiring, but a substantial reduction in the number of vehicles is expected. To start the electrification intervention, FiberCop is equipping itself with columns and wallboxes, with a development plan that provides for the installation of 43 columns with 2x22KW and 50 KW power and 246 wallboxes with 7 KW and 11 KW power by 2026. The plan will continue in the following years. The involvement of the supply chain through the structured **Building Network** pathway, as described in S2, on ESG issues, completes FiberCop's transition plan for climate change mitigation.

16d Data point is not applicable as there has been a change in ownership of the trigenerators and therefore the potential locked-in emissions

are no longer present and have no impact on FiberCop's decarbonisation targets.

16h FiberCop completed the detailed analysis of its energy consumption in 2025 and defined the areas of intervention, described above, departmental to the energy transition path, including it in FiberCop's strategic guidelines and in the related financial planning.

16i The Management Committee played a crucial role in accelerating the definition of the transition plan to Net-Zero and its validation by SBTi, keeping the Company's Board of Directors aligned.

16g FiberCop is not excluded from benchmarks aligned with the Paris Agreement.

↳ E1-2

Policies related to climate change mitigation and adaptation

FiberCop, aware of its role and the strategic importance of its activities, is committed to creating value for its stakeholders and reconciling its mission and business with global sustainable development, ensuring the pursuit of resource efficiency objectives, emission reduction, and the creation of a sustainable value chain, contributing to the achievement of the United Nations Sustainable Development Goals.

In view of its role and the context in which it operates, FiberCop has adopted its own Environmental Policy that guides the management of environmental aspects, including related impacts, risks and opportunities, identified as priorities following internal double materiality analyses and thanks to the involvement of external stakeholders, primarily telecommunications and media operators, supply chain actors and workers and national and local institutions. The Environmental Policy applies to FiberCop, including its value chain, to which FiberCop conveys and communicates the elements of the Policy in order to share its approach and translate it into joint actions towards shared objectives and goals. The recipients are FiberCop's operational structures and corporate departments.

The principles and guidelines of the Environmental Policy are communicated and made available to employees, supply chain actors and workers, customers and all stakeholders through the communication channels activated by the organisation. The Sustainability department, within the Chief Corporate Officer, is responsible for implementing the Environmental Policy with the involvement of stakeholders and updating it according to FiberCop's needs/requirements; it is also responsible for compliance with the Policy in relation to stakeholder involvement.

In this regard, FiberCop has shared a draft of the Policy prior to the final version in order to gather suggestions and feedback. The Chief Human Resources department is responsible for compliance with the Policy regarding the involvement of FiberCop people. The Chief Compliance Officer oversees the risk of non-compliance with the relevant regulations. The Chief Technology Officer oversees and promotes energy efficiency plans.

FiberCop's Environmental Policy directs and declines the corporate strategy on the following guidelines:

- deployment of the network guided by the principles of energy efficiency and respect for the environment and ecosystems: lower energy consumption and lower environmental impacts, also led to the gradual replacement of copper fiber;
- a transition plan from fossil fuels in favour of renewable sources with progressive engagement of the entire value chain;
- planned decommissioning of network equipment with high emission value together with policies for the purchase of goods and services guided by the principles of energy efficiency and circular economy.

FiberCop declines the principles of environmental sustainability set out above in its operations, in particular in its procedures, practices and on its sites, also through appropriate certifications. It promotes

energy efficiency in all activities, implementing energy management systems that comply with the reference standards in order to identify opportunities for improvement and promptly monitor energy consumption.

The Company also strengthens its activities through:

- identification of the environmental risks deriving from its operations as well as the physical and transition risks deriving from the context in which it operates;
- verification that each issue overseen is governed by a specific internal regulatory framework, is equipped with management systems for tracking and monitoring performance through appropriate indicators, and has assigned the relevant responsibilities;
- definition of a path of progressive improvement shared and periodically communicated to stakeholders;
- mitigation of climate change through an energy transition and the consequent reduction of greenhouse gas emissions, along its entire value chain, in line with the long-term Net-Zero goal and with positive impacts on the indirect emissions of all network users;
- adaptation to climate change through redundancy and resilience of its network, appropriate placement of its assets and prevention of climate-related risks for workforce.

FiberCop's Environmental Policy was presented to the Board of Directors in February 2025, was communicated internally via the intranet site, to external stakeholders through publication on the website and was the subject of training for FiberCop people during the year.

In line with the principles enshrined in the institutional environmental Policy, FiberCop has adopted an energy policy that defines principles, processes and criteria that guide the management of energy aspects throughout the entire operating cycle, ensuring consistency with the objectives of the transition plan. FiberCop integrates a structured monitoring of energy performance into its Energy Management System, enhancing the adoption of the ISO 50001 Standard – certification renewed until 2028 – as a methodological reference to ensure continuous improvement in energy use.

The application of ISO 50001 allows FiberCop to monitor consumption and performance in a timely manner through indicators such as the Energy Performance Index (IPE)/ Power Usage Effectiveness (PUE), supporting the definition of measurable targets for the period 2025-2028 and the implementation of dedicated actions, including asset modernisation, decommissioning of the copper network and further initiatives to reduce consumption at certified sites.

In this context, the Energy Management System represents an enabling tool for pursuing the

improvement of energy efficiency, also in relation to the fight against climate change, as well as the strengthening of corporate resilience, contributing to the integration of energy issues within the environmental strategy and the broader path towards Net-Zero. During 2026, the Company will continue to expand the perimeter of certified sites, confirming the solidity of the management model implemented.

↳ E1-3

Actions and resources related to climate change policies

29 Within the 2025-2027 strategic guidelines, FiberCop envisages commitments of approximately €8.5 billion, of which a significant portion (between 13% and 18%) is also related to decommissioning and IT, in addition to annual operating costs related to asset modernisation and the purchase of renewable energy.

Given the high degree of complementarity between the first two actions available to FiberCop (decommissioning and asset modernisation) to achieve the Net-Zero target, the disclosures relating to the ESRS E1-3 29a,b disclosure requirement are not always separable in a timely manner. In fact, the resources available could be

allocated differently within the same reporting period depending on the opportunity to accelerate or slow down the various levers and/or seize new opportunities, such as, for example, proceeding more radically with the consolidation of smaller exchanges or anticipate modernisation activities.

29b,c During 2025, decommissioning activities enabled electricity savings of over 50 GWh, equivalent to a reduction of over 22,000 tonnes of CO₂, mainly thanks to compaction activities. Legacy technologies (copper cables, voice and data equipment and cards) decommissioned during the plan period (2030) will lead to estimated electricity savings of 450 GWh, translating into real economic benefits for FiberCop.

Operational activities related to asset modernisation will peak between 2028 and 2029; the plan, implemented by EnerCop for FiberCop, will lead to annual energy savings of around 200 GWh when fully operational, thanks to greater efficiency of power & cooling equipment, while also optimising maintenance processes with benefits in terms of resilience and service continuity.

The activity will be carried out through a service fee model.

In 2025, analyses were conducted and projects defined for the first 10 sites, for a theoretical saving of 10 GWh, through a test of operational methodology

and validation of the technical approach with the definition of standards and best practices, whose full implementation is expected in 2026.

In 2025, FiberCop's share of the PPA with ERG will be 437 GWh (approximately 80% of the total). This supply makes a structural contribution to achieving Scope 2 emission reduction targets and to stable coverage of electricity demand with renewable sources until EnerCop becomes fully operational, which, based on current plan forecasts, should contribute over 400 GWh in 2030.

The main uncertainties regarding EnerCop's development plans are related to the acquisition of surface rights on third-party FiberCop sites.

The purchase of renewable electricity is included in FiberCop's operating costs. The costs of purchasing renewable electricity amounted to just over €80 million in 2025, with production from EnerCop's plants amounting to 1.3 GWh for the year.

These costs are included in FiberCop's annual Financial Report. As regards the vehicle fleet, as already mentioned, by the end of 2025 it will consist of 8,975 vehicles, of which 188 will be electric and 484 will be hybrid (electric-petrol), accounting for approximately 7% of the total. As already described in E1-1, in the emissions reduction plan, the most significant intervention in the rationalisation of the vehicle fleet is planned for 2026, while the

electrification of the fleet will take place after 2030, as the contracts renewed before the creation of the current FiberCop (July 2024) approach their expiry date.

To be ready for this deadline, FiberCop is equipping its offices and exchanges with charging stations and wallboxes, as described above.

FiberCop also integrates the use of Energy Efficiency Certificates (EECs) into its energy management model, taking an active role both as the owner of its own projects and as the Proponent⁸ of third-party projects, confirming the maturity of the system developed and its ability to enhance the energy efficiency measures implemented throughout the entire operating cycle. By way of example, projects eligible for EEC certification include measures aimed at reducing consumption and/or increasing traffic at operational sites, such as the modernisation of power supply and air conditioning systems serving telecommunications services with new high-efficiency equipment. The adoption of EECs allows the Company to enhance

the efficiency measures implemented throughout the entire operating cycle, through structured project management and accurate monitoring of the savings achieved.

In this context, EECs represent an incentive to strengthen corporate resilience and make a concrete contribution to the path towards greater efficiency and the progressive decarbonisation of infrastructure.

↳ E1-4

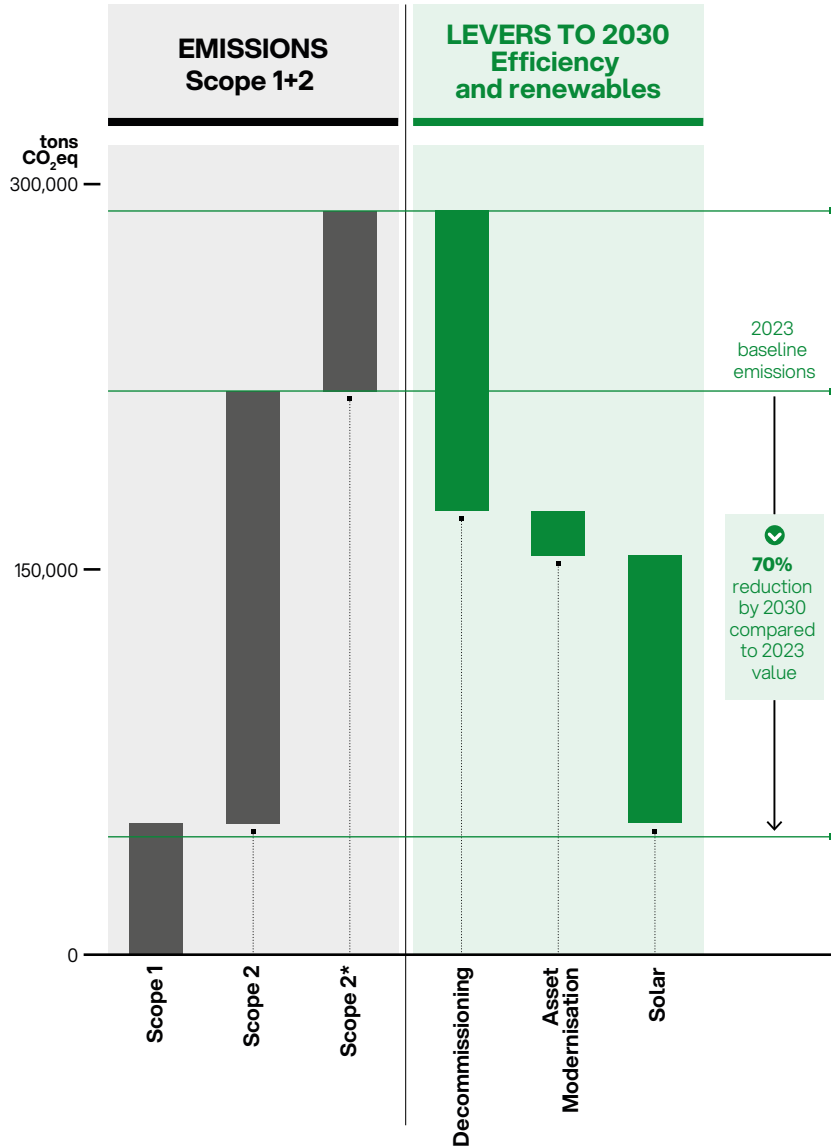
Targets related to climate change mitigation and adaptation

34a,b,d,e,f In line with industry best practices, FiberCop aims to achieve the long-term Net-Zero target, validated by SBTi, and, as described in the previous paragraphs (E1-1 16a), on 10 July 2025, SBTi stated that the targets for reducing direct and indirect CO₂eq emissions (Scope 1-2-3) are aligned with the reductions required to keep global warming below 1.5°C. The data are aggregated for Scope 1 and 2 and separately for Scope 3.

The data are aggregated for Scope 1 and 2 and separately for Scope 3. The Company estimates that it will be able to reduce Scope 1 and 2 emissions by 70% by 2030 and achieve a value close to 45,000 CO₂eq tons compared to the 2023 value (219,000 CO₂eq tons).

⁸ During 2025, FiberCop acted as the Proponent.

DECARBONISATION OF SCOPE 1 & 2 EMISSIONS BY 2030 AND RELATED LEVERS



The Scope 3 reduction target consists of two different levers:

- for category 13⁹, the 70% reduction by 2030 is expected to reach a value close to 130,000 CO₂,eq tons compared to the 2023 value (444,000 CO₂,eq tons);
- for categories 1 and 2¹⁰, the plan is to engage with the most relevant suppliers in terms of expenditure to achieve a 41% reduction in emissions by 2029.

The near-term values do not foresee a reduction in emissions through carbon credits, while the long-term values for a residual part only apply to emissions that can no longer be reduced and therefore only after the targets set through decarbonisation actions have been achieved. **34c** Targets involve the entire value chain, upstream and downstream, and are based on 2023. To identify the base year, FiberCop analysed the emission values for 2023, bringing them back to

the current perimeter, while to define the trends it assessed the impact of strategic decisions that could have influenced their performance. It should also be noted that the Scope 2 emissions considered in the decarbonisation targets are calculated using the market-based approach¹¹.

The impact of the different decarbonisation levers is shown in the graph and described in detail in E1-1.

The reduction target for 2040 will be achieved through the following measures:

- total electrification of the fleet and promotion of the use of HVO¹² fuel;
- replacement of refrigerant gases with low GWP¹³ alternatives;
- installation of electric heat pumps for heating and, for a residual part, with projects to remove emissions from the atmosphere starting from the Net-Zero target year.

9 Downstream Leased Assets.

10 Category 1: Purchased Goods & Services; category 2: Capital Goods.

11 Greenhouse gas emissions calculated using the market-based method represent indirect Scope 2 emissions associated with the consumption of electricity, heat, steam or cooling attributed on the basis of the organisation's energy procurement choices, and not on the basis of the average intensity of the local electricity grid.

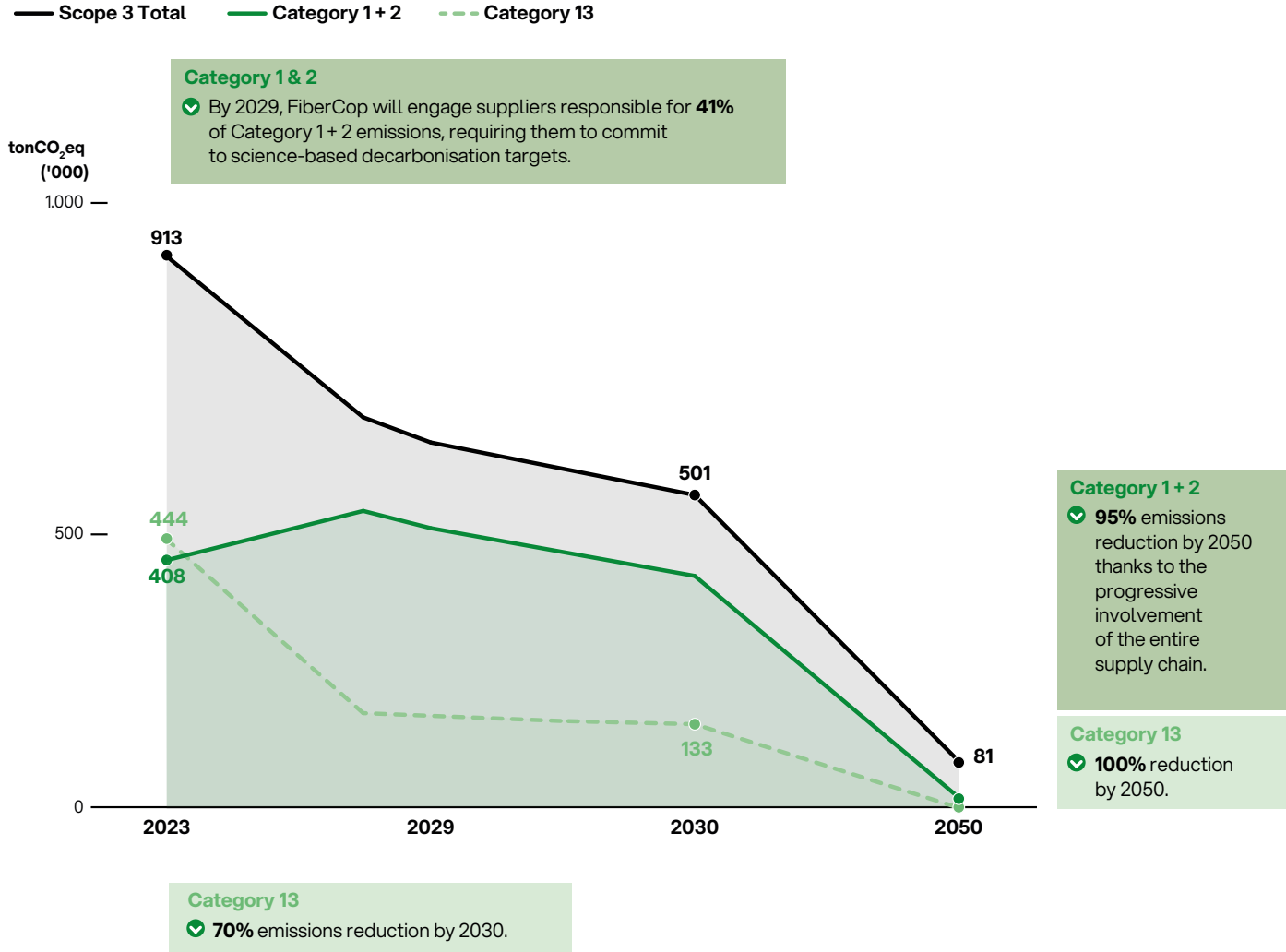
12 HVO: Hydrotreated Vegetable Oil.

13 GWP: Global Warming Potential.

*Cautious assumptions

DECARBONISATION OF VALUE-CHAIN-RELATED EMISSIONS (SCOPE 3) – EMISSIONS PROJECTION

(Data in 000)



The Scope 3 reduction target consists of two different levels:

- for category 13¹⁴, the 70% reduction by 2030 is expected to reach a value close to 130,000 CO₂eq tons compared to the 2023 value (444,000 CO₂eq tons);
- for categories 1 and 2¹⁵, the plan is to engage with the most relevant suppliers in terms of expenditure to achieve a 41% reduction in emissions by 2029.

The reduction target for 2050 will be achieved through the following measures:

- for category 13, absolute reduction (100%) with energy requirements entirely met by renewable sources thanks to supply from EnerCop;
- for categories 1 and 2, a 95% reduction thanks to the progressive involvement of the entire supply chain.

¹⁴ Downstream Leased Assets.

¹⁵ Category 1: Purchased Goods & Services; category 2: Capital Goods.

The strategic guidelines incorporate the sustainability plan, including sub-objectives for each of the Planet, People, and Prosperity areas as illustrated in the previous chapters; each area has specific objectives dedicated to combating climate change.

FiberCop's Environmental Policy represents the strategic framework that guides the organization and its value chain towards climate change mitigation and adaptation and natural resource management. For further details, please refer to G1-1.

The investor stakeholder actively participated in the design, analysis, and definition of climate objectives, recognizing the project as relevant within a broader portfolio of industrial and infrastructure assets for which structured decarbonization objectives have been defined.

In this context, the alignment of FiberCop's climate strategies with the emission reduction trajectories adopted at portfolio level is a key element for long-term value creation, climate risk management, and the overall consistency of the investor's ESG policies.

↳ E1-5 Energy consumption and energy mix

37 FiberCop's energy consumption is divided between consumption of electricity from renewable sources purchased, consumption of electricity from mixed sources, consumption from heating fuels, consumption from transport fuels. No share of electricity, heating, cooling, or steam is sold.

38, 40, 41, 42, 43 The Company does not operate in a sector with a high climate impact.

Total consumption from fossil fuels includes electricity from mixed sources and energy produced from the use of fossil fuels. The production of non-renewable energy, on the other hand, refers to the share of energy from fuels for uninterruptible power supplies.

Energy from renewable sources includes the purchase of electricity through PPAs and the purchase of solar energy produced by EnerCop; the activities related to the production of solar energy by EnerCop are in the start-up phase; the amount of renewable energy from photovoltaics is equal to 1.3 GWh. As already described, during 2025 FiberCop's trigenerators became property of EnerCop: the related emissions are therefore counted in Scope 2.

Energy consumption and energy mix	u.m.	
Total energy consumption from fossil sources	MWh	385,130
Percentage of fossil fuels in total energy consumption	%	48
Total energy consumption from nuclear sources	MWh	0
Percentage of energy consumption from nuclear sources in total energy consumption	%	0
Consumption of fuels from renewable sources	MWh	0
Consumption of electricity, heat, steam and cooling from renewable sources, purchased or acquired	MWh	410,407
Consumption of self-generated renewable energy without the use of fuels	MWh	0
Total energy consumption from renewable sources	MWh	410,407
Percentage of renewable sources in total energy consumption	%	52
Total energy consumption related to own operations	MWh	795,537

In the following tables, trigenerators are considered in Scope 2.

39 The share of self-produced renewable energy is not indicated as renewable energy production is the responsibility of EnerCop and therefore constitutes a purchase for FiberCop.

The only share of self-produced energy is non-renewable energy relating to the energy produced from diesel fuel for uninterruptible power supplies.

↳ **E1-6**

Gross Scope 1 GHG emissions

Scope 1 emissions derive from the use of fossil fuels

for transport, heating, electricity generation from uninterruptible power supplies. Scope 1 emissions include emissions from ozone-depleting gas leaks from refrigeration systems. There are no biogenic emissions from the combustion or biodegradation of biomass. The emission factors used in 2025 are CO₂eq factors published by BEIS (formerly Defra).

The assessment of CO₂eq emissions of HCFCs, HFCs and other refrigerant gases is carried out by reference to their respective Global Warming Potentials (GWPs): the index is based on a relative scale that compares the gas considered with an equal mass of carbon dioxide whose GWP is equal to 1.

The IPCC's Sixth Report Assessment was used in the calculation.

DIRECT EMISSIONS

Scope 1	u.m.	
Total Scope 1	tCO ₂ eq	29,782
Scope 1 emissions from emissions trading systems (ETS)	tCO ₂ eq	-
Share of Scope 1 emissions from emissions trading systems	%	-

↳ E1-6

Gross Scope 2 GHG emissions

The following table illustrates the indirect emissions of FiberCop from the purchase of electricity. The source of the atmospheric greenhouse gas emission factors is the AIB 2024 report for Italy for the market-based approach.

Scope 2 location-based emissions¹⁶ are calculated using the efficiency and decarbonization indicators of the national energy system and the electricity sector - ISPRA Report 413/2025 for Italy.

The contractual instruments relating to the purchase of renewable energy and the amount of market-based Scope 2 emissions covered 100% by PPA combination instruments are highlighted below, as well as the percentage of incidence of coverage in relation to market-based emissions. FiberCop uses 63% of its electricity from renewable sources and uses contractual instruments for 410,407 MWh. The contractual tools used by FiberCop to certify the renewable origin of the electricity purchased are the Guarantees of Origin (GO). GOs are electronic certifications that prove that the energy fed into the grid by IGO qualified plants comes from renewable sources, issued by the GSE in accordance with the provisions

INDIRECT EMISSIONS

Scope 2

u.m.

Location-based Scope 2 gross GHG emissions	tCO ₂ eq	172,211
Market-based gross Scope 2 GHG emissions	tCO ₂ eq	110,647

SCOPE 1+2 WITH TRIGENERATION IN SCOPE 1 OR IN SCOPE 2

	u.m.	Trigeneration in Scope 1	Trigeneration in Scope 2	Var. %
Scope 1	tCO ₂ eq	56,038	29,782	
Scope 2¹⁷	tCO ₂ eq	81,692	110,647	
Scope 1+2	tCO₂eq	137,730	140,429	2%

of Directive 2009/28/EC. 100% of market-based emissions refer to electricity purchased in combination with instruments; no stand-alone contractual instruments were used. Compared to 2023, electricity consumption decreased by 18% thanks to a more precise allocation of consumption between FiberCop and its customers as well as internal efficiencies. Scope 2 emissions calculated using the location-based method decreased, mainly due to the reduction in energy consumption and, in part, to the decrease in the emission factor of "electricity consumption of the national grid" compared to the

previous year. The reduction in Scope 2 emissions calculated market-based is instead due to the lower consumption mentioned above and a greater share of energy from renewable sources purchased by the Company for its own consumption. It should be noted that the Scope certified by SBTi considers the emissions of trigenerators in scope 1; during 2025, ownership of the trigenerators passed to EnerCop and therefore the related emissions fall within Scope 2 for FiberCop. This change affects approximately 2% of the Company's emissions (Scope 1+2), as shown in the table below.

¹⁶ Location-based approach involves the use of a national average emission factor relating to the specific national energy mix for the production of electricity (source: ISPRA).

¹⁷ Scope 2 market-based.

GHG EMISSIONS

Scope 3 Categories	u.m.	
Category 1 Purchased goods and services	tCO ₂ eq	289,644
Category 2 Capital goods	tCO ₂ eq	200,472
Category 3 Fuel- and energy-related activities (not included in Scope 1 or 2)	tCO ₂ eq	52,141
Category 4 Upstream transportation and distribution	tCO ₂ eq	n.a. ¹⁸
Category 5 Waste generated in operations	tCO ₂ eq	12,695
Category 6 Business travel	tCO ₂ eq	775
Category 7 Employee commuting	tCO ₂ eq	11,315
Category 8 Upstream leased assets	tCO ₂ eq	n.a. ¹⁹
Category 9 Downstream transportation and distribution	tCO ₂ eq	n.a. ¹⁹
Category 10 Processing of sold products	tCO ₂ eq	n.a. ¹⁹
Category 11 Use of sold products	tCO ₂ eq	n.a. ¹⁹
Category 12 End-of-life treatment of sold products	tCO ₂ eq	n.a. ¹⁹
Category 13 Downstream leased assets	tCO ₂ eq	154,947
Category 14 Franchises	tCO ₂ eq	n.a. ¹⁹
Category 15 Investments	tCO ₂ eq	n.a. ¹⁹
Gross Scope 3 GHG emissions	tCO₂eq	721,989

<T> E1-6

Gross Scope 3 GHG emissions

Scope 3 emissions from FiberCop are represented here. The calculation of categories 1 and 2 was carried out on a purchase basis using the spend-based method. Category 3 was calculated considering the consumption of automotive fuels, the natural gas used for heating, the diesel used for generators and electricity consumed, using Defra WTT factors.

Category 5 takes into account the costs incurred for waste disposal. Category 13 is calculated from the shares of electricity from mixed sources and heating reversed to third parties rented at FiberCop spaces.

Category 6 is calculated only on expenses incurred

for business trips. The categories listed so far are calculated using primary data; category 7 is based on analyses and estimates derived from sample data from the home-to-work (Mobility Survey) administered to employees in 2025.

There are no biogenic emission allowances. Compared to 2023, cat 13 emissions were reduced by 65%, thanks to the zeroing of emissions from FiberCop's main client operator; Category 3 emissions decreased by around 8%, as a result of reduced energy consumption.

Category 1 and 2, on the other hand, show a significant increase, as the Company's development plan provides for a substantial increase in investments to complete the deployment of the network. This trend will also continue in the coming years.

¹⁸ All upstream transportation services purchased by FiberCop are included in Category 1 and Category 2.

¹⁹ The excluded categories are not relevant to FiberCop's business.

↳ E1-6

Gross Scopes 1,2,3 and Total GHG emissions

44,53 The table summarizes the total emissions of FiberCop. No other types of aggregation are provided in consideration of the fact that FiberCop operates only in Italy.

TOTAL EMISSIONS

GHG emissions	u.m.	
Scope 1 gross GHG emissions	tCO ₂ eq	29,782
Location-based Scope 2 gross GHG emissions	tCO ₂ eq	172,211
Market-based gross Scope 2 GHG emissions	tCO ₂ eq	110,647
Scope 3 gross GHG emissions	tCO ₂ eq	721,989
Total location-based GHG emissions	tCO ₂ eq	923,982
Total market-based GHG emissions	tCO ₂ eq	862,418

The intensity of emissions was calculated by relating the total of the three Scopes in the two market-based and location-based views to 2025 revenues, as per the 2025 Annual Financial Report.

GHG INTENSITY RELATIVE TO NET REVENUES

Emissions - Net revenues - Intensity	u.m.	2025
Total location-based GHG emissions	tCO ₂ eq	923,982
Total market-based GHG emissions	tCO ₂ eq	862,418
Net revenues used to calculate GHG intensity	million €	3,775
Location-based GHG emission intensity	tCO ₂ eq/€ million	244.763
Market-based GHG emissions intensity	tCO ₂ eq/€ million	228.455

E1-7

GHG removals and GHG mitigation projects financed through carbon credits

56 FiberCop has no GHG removal initiatives in place nor has it contributed to similar actions along its value chain.

The Company has not used carbon credits in the current year.

The use of offsetting projects and the related obtaining of carbon credits are contemplated in FiberCop's transition plan but will be assessed only downstream of the direct actions envisaged by the Plan and any integration of the benefits brought by them in terms of GHG reduction.

E1-8

Internal carbon pricing

FiberCop has not launched assessments in 2025 to set an internal carbon price.

Resource Use and Circular Economy

ESRS E5

ESRS 2 IRO-1

Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

11a FiberCop conducted a wide-ranging impact, risk and opportunity analysis on the decommissioning activities of the legacy copper grid exchanges; downstream of the analysis, the following opportunities with positive environmental impacts were identified due to their contribution to circularity thanks to the reduction:

- recovery of copper which is then placed on the market as a secondary raw material, resulting in a reduction in the extraction of new raw material;
- of WEEE (i.e. electrical and electronic equipment to be disposed).

The phases, divided into upstream and downstream activities, can be identified with:

- upstream: shutdown exchanges, selection of materials;
- downstream: recycling of recovered materials.

The economic savings resulting from energy savings and the revenues related to the resale of disused equipment and copper recovered from exchanges are real and positive impacts of the project, guided by stages and objectives set and monitored in their progress by the Company department in charge of the decommissioning project.

11b AGCOM, as described in E1-1, is the main stakeholder involved in the decommissioning project.

E5-1

Policies related to resource use and circular economy

15,16 FiberCop's Environmental Policy also addresses circular economy issues. The Company works for the optimization of activities based on circular use models, circular value recovery models and support for the circular economy traced by the principles of the nine "Rs": reject, rethink, reduce, reuse, repair, renovate, remanufacture, reuse and recycle. Even the plans for the disposal of obsolete equipment are acted according to the principles of circular decommissioning through agreements with interlocutors interested

in what FiberCop has decommissioned and the enhancement of copper replaced by fiber. The Company does not have an industrial production sector; therefore the supply of virgin or renewable resources is an issue that it oversees through its supply chain. The selection of suppliers passes through sustainability parameters with a focus on ESG maturity, documentary request, including certifications, guaranteeing final products, approach in processes and in the treatment of sustainable materials. From 2025, FiberCop's Environmental Policy is a clause in contracts with suppliers, also applied to renewals and order forms. FiberCop declines the elements of its Environmental Policy in its operations, with constant attention to the circular economy, to consciously select its value chain and giving real weight to environmental sustainability characteristics throughout the entire life cycle of the product/service purchased. FiberCop is careful to include environmental sustainability criteria in the evaluation of possible mergers and acquisitions and to manage the waste generated through its activities in order to favor the reuse, recycling and repair of objects and materials, minimizing the use of hazardous substances.

For more information on the Environmental Policy please refer to section E1-2, which describes the policies adopted to deal with relevant sustainability issues.

**E5-2
Actions and resources related to resource use and circular economy**

The decommissioning project was previously described in E1-1 Transition Plan for Climate Change Mitigation, which describes the actions planned during the plan years, the involvement of the supply chain and the most impacted stakeholders, as well as the remedial actions implemented by FiberCop. This project, in addition to its positive impact on energy consumption, also generates an increasing economic return, thanks to the resale of equipment, boards, technological waste, and copper from compacted and decommissioned exchanges.

20a-d In 2025, decommissioning activities have allowed the recovery of over 500 tons of copper (secondary raw material), the resale of over 300,000 electronic boards, and the recycling of over 1,100 tons of technological waste. The most significant impact will occur in the next few years of the plan with the shutdown of 6,800 exchanges. It is estimated that over 100,000 tons of secondary raw material copper

will potentially be released to the market in the coming years as part of the broader decommissioning and technology transition project.

For 2025, FiberCop recorded revenues of 5 million euros from the resale of equipment, boards, technological waste and copper decommissioned from compacted and discontinued exchanges.

20e,f After the switch-off, the emptying of the exchanges is envisaged, which consists of the dismantling and recovery of the tlc equipment and auxiliary systems (energy stations, air conditioners, batteries) and management of the recovered materials for their economic enhancement or disposal according to environmental regulations. Requests For Information (RFI) are underway on these aspects; downstream of the decisions on the most suitable business models, FiberCop will report in the coming years.

**E5-3
Targets related to resource use and circular economy**

FiberCop does not report specific targets, as no formal quantitative targets have been adopted for the scope covered by the report in the reference period.

FiberCop, therefore, postpones the definition and reporting of specific targets to future financial years, should such targets be formally approved.

**E5-5
Resource outflows**

37,38,39 The following section describes the streams of industrial waste.

INDUSTRIAL WASTE

	u.m.	Hazardous	Non-Hazardous
Total amount diverted from disposal (37b)	tons	2,500	7,953
Total amount directed to disposal (37c)	tons	0	6
Total waste	tons	10,459	

In 2025, FiberCop produced 10,459 tons of waste, mainly generated by operational, technical, maintenance and decommissioning activities, of which 76.1% is non-hazardous and 23.9% hazardous. 99.9% of the waste was sent for recycling, while the residual fraction, equal to 0.1%, was managed through final disposal by destruction. The composition of waste is very heterogeneous and reflects the technological and infrastructural nature of FiberCop's activities. A significant part (746 tons that is 7% on total waste) is

made up of WEEE, generated during the replacement and disposal of electronic equipment and network systems: this waste includes conductive metals, technical plastics, glass, resins and electronic boards that can also contain small quantities of critical raw materials. 100% of WEEE is recycled.

These materials are sent to specialized operators, who allow their recovery and enhancement, favoring the reuse of components and metals within the production cycles.

Alongside WEEE, a significant share is made up of disused cables and insulation sheaths in copper, aluminium and plastic polymers (PVC and polyethylene), mainly linked to network decommissioning activities: these flows are among the most characteristic of FiberCop's operating model.

Particularly important is the recovery of copper, as described in the previous paragraphs, a high-value material which, thanks to selection and recycling processes, is reintroduced into the production system, reducing the need to extract new resources and contributing to the conservation of raw materials.

The picture is completed by recyclable fractions from packaging (paper, cardboard, plastic, wood and metals), as well as materials generated by civil activities such as building aggregates, treated through specific channels dedicated to construction and demolition waste. Hazardous waste, such as batteries, electrolytes and used toners, is instead managed in a controlled manner by authorized facilities, ensuring safety and regulatory compliance. No radioactive waste was produced during the exercise. FiberCop applies procedures aimed at maximum recovery of materials and minimization of final disposal, ensuring responsible management of the waste generated by its activities. The data was processed using waste identification forms and the completed loading-unloading register.

E5-6

Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities

On the expected financial effects, in-depth studies are underway on the most suitable business models to proceed with the valuation of copper; FiberCop will report in the coming years.

European Taxonomy

This document, prepared on a voluntary basis in accordance with the ESRS standards, does not include the disclosures required under Regulation (EU) 2020/852 on the "EU Taxonomy".

FiberCop carried out a preliminary, voluntary assessment - not subject to limited assurance by EY S.p.A. - of its economic activities according to the criteria established by the Regulation and the related delegated acts. However, the results of the analysis showed values below the materiality threshold of 10% set by Delegated Regulation (EU) 2026/73.

In light of these preliminary results, the Company has therefore decided not to disclose the KPIs required under Article 8 of Regulation (EU) 2020/852 within the 2025 Sustainability Statement.

FiberCop will continue to monitor the evolution of the regulatory framework and updates to the delegated acts, with a view to progressively integrating the required information in future reporting cycles, also in anticipation of a potential future mandatory application of the Regulation to the Company.



Social Information

Own Workforce

ESRS S1

ESRS 2 SBM-2 Interests and views of stakeholders

Please refer to the chapter "General Information – Stakeholder Engagement" for a description of how to involve stakeholders.

ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with the strategy and business model

13a FiberCop operates in a sector characterised by continuous technological evolution and rapidly changing market dynamics. In this context, the ability to adapt skills, processes and organisational models is a critical success factor. The Company's workforce is therefore one of the Company's most important strategic assets: for FiberCop, investing in people concretely means enhancing a wealth of professionalism, experience and knowledge that enables sustainable growth, innovation and the achievement of long-term goals. At the same time, FiberCop pays the utmost attention to the protection of health and safety at work, an essential element to ensure adequate operating conditions, prevent risks and support a responsible and protected professional environment, in line with the Company's strategical guidelines and ESG principles.

13b FiberCop's intellectual capital – understood

as the wealth of technical skills, specialised know-how, operational skills and attitudes of its people – represents a fundamental enabling factor for the implementation of the strategy and for the creation of sustainable value in the medium-long term.

In a context characterised by profound technological and digital transformation, the enhancement of people is a strategic lever to ensure organisational resilience, quality of service and capacity for innovation. Responding to IROs described in ESRS 2 SBM-3 and relating to the enhancement of people, FiberCop's People Strategy is divided into four main pillars:

- 1. Culture and change.** FiberCop promotes the construction of a distinctive corporate identity, based on purpose, shared values and inclusive behaviors. Through structured change management programs, the Company accompanies the evolution of the operating and organisational model, encouraging the adoption of new ways of working consistent with the path of industrial and digital transformation.
- 2. Value creation through organisational evolution.** The creation of value passes through the continuous adaptation of



the organisational structure to the new Company's reality and to the market context, characterized by digitization of processes and technological innovation. FiberCop works to simplify structures and processes, improve operational efficiency and strengthen decision-making effectiveness, ensuring an agile organisation, consistent with strategic priorities and oriented towards the generation of sustainable value.

3. **Upskilling and reskilling.** The Company invests in the development and updating of skills through dedicated training courses, designed by its Academy, which represents the strategic safeguard for the development of skills and is responsible for defining and implementing upskilling and reskilling paths in line with industrial priorities.

Subject Matter Experts (SMEs) are the backbone of the model: they design and validate content, ensure technical quality and transfer of specialist know-how, accelerating the dissemination of critical skills in key roles.

The joint action of the Academy, external stakeholders such as universities and Business Schools and its SME network makes it possible to anticipate needs, reduce professional gaps and support the evolution of the Company's

operating and technological models. These initiatives support the evolution of business and facilitate the transition to new operating and technological models.

4. **Strengthening engagement.** FiberCop promotes a sense of belonging and the enhancement of talents through talent

management programs, internal and external communication initiatives and the definition of a clear Employee Value Proposition.

The activation of a network of Company Ambassadors and internal communities helps to encourage participation, sharing and cultural coherence throughout the organisation.

FIBERCOPI JOURNEY

FiberCop Journey represents the path of change of FiberCop's cultural model started since its start-up, based on Purpose, Vision, Values and declined in structured initiatives. It was born from the work of the Leadership Team, the main sponsor, and HRO laboratories spread throughout the Company that gave life to the new Purpose "Let's enable ingenuity, build the future, connect Italy" and the choice of behavioral values - "do's & don't's" - in line with the renewed identity of FiberCop: #ActRESPONSIBLY; #BeCOURAGEOUS; #WorkASATEAM; #CareDEEPLY; #PursueEXCELLENCE.

Widespread participation is guaranteed through the network of Ambassadors, active in fostering dialogue, collaboration and involvement of teams in the territories and through a structured program of internal communication and training on skills, behaviors and leadership skills.

An important junction of FiberCop Journey is the adoption of the new Performance Management that enables the culture of feedback and performance evaluation consistent with the cultural model.

14a FiberCop's people are distributed throughout the Country; among the figures present in the territory, the peculiar figures are the following: Field technicians¹; online technicians²; Head of (tlc) Exchange³; territorial safety officers; PM/achievers⁴. FiberCop people are workers hired with one of the types of contracts provided for in the National Collective Bargaining Agreement for Telecommunications. For resources that do not fall within this contract and therefore do not appear as subordinate work but that fall under the heading own workforce as non-employees, self-employed workers and trainees are identified.

14b,f,g Its own activities are carried out entirely in Italy, a context in which workers' rights are strongly regulated. The existence of stringent regulations and processes for monitoring their implementation, as well as the presence of national collective labour agreements (CCNL), has made the risk of forced and child labour in relation to the Company's activities not considered material. Any negative impacts are due to individual injuries that

may occur during work and on which the Company exercises constant supervision through the HSE (Health, Safety & Environment) department, which reports directly to the Chief Corporate Officer. In addition, among other potential negative impacts, the increase in in-office attendance days -linked to the need for greater employee engagement during FiberCop's start-up phase-should be considered. This may affect employees' work-life balance and, consequently, their motivation, as well as FiberCop's attractiveness to new talent.

14d Finally, possible risks include the failure to adapt to the skills required by the market and new technologies, and the legal and reputational risk associated with the effective implementation of health and safety plans. This aspect is crucial not only for FiberCop employees but also throughout the supply chain. Potential reputational risks include discrimination, unequal treatment, and harassment in the workplace. Opportunities related to flexible and hybrid working models. At the same time, flexible and hybrid working models can improve

employee productivity and well-being, attracting new generations of talent while reducing operating costs.

14c FiberCop's double materiality analysis has highlighted the positive impacts of initiatives such as the Welfare plan, aimed at promoting people's psychophysical well-being, and the "Diversity & Inclusion" program.

14e FiberCop's transition plan, as already reported in E1, will have its full development over the 2026-2030 plan period by strengthening the digitalization of the network through, in addition to the roll-out of fiber, decommissioning and energy efficiency actions of assets; the associated technological evolution requires continuous updating of skills and structured monitoring of training needs.

15,16 FiberCop adopts a systemic, flexible and dynamic approach to analyse and understand the risks and impacts that may affect its people, in particular the field technicians most exposed to injuries with high damaging potential, such as falls from heights, electrical risk and descent

-
- 1 Field technician responsible for installation, maintenance, technical support, and provisioning of fiber optic and copper network systems, as well as tlc products and services offered to customer operators.
 - 2 A technician who works remotely, contributing to the quality, reliability, and sustainability of network services, performing diagnostics, monitoring, and technical support activities through digital platforms.
 - 3 The Head of Exchange or Central Office Manager, is responsible for managing and protecting FiberCop properties, ensuring the preservation of Company assets and monitoring quality and safety standards, providing technical and managerial oversight of infrastructure, contributing to its efficiency and integrity.
 - 4 Verify the activities carried out in the field by companies and oversee project reporting, ensuring the correct transmission of information to the relevant authorities and contributing to transparency in the management of investment programs.



into underground telecommunications chambers (confined spaces); this activity is entrusted to the Health, Safety & Environment department. Safety at work represents an essential value and requires a continuous, integrated approach consistent with current regulations and technological evolution. Collaboration with institutions and other companies allows us to share experiences and disseminate good practices. The HSE department supports the organisation in managing issues related to prevention, worker health and safety, and environmental protection, coordinating initiatives and risk assessments to promote informed and responsible behavior. Training is an essential lever

to ensure that people are prepared to manage technological and operational transformations, support business resilience and seize the opportunities arising from innovation.

In this perspective, FiberCop has developed specific programs aimed at the acquisition and consolidation of technical skills, on the business and safe use of AI and safety in the workplace, with the aim of reducing potential negative impacts and strengthening the positive impacts related to people's growth. In particular, training dedicated to health and safety is one of the pillars of the training offer, in line with the provisions of Legislative Decree 81/08 and the State-Regions Agreement. The Company invests in mandatory courses and targeted training to prevent injuries and strengthen the "safety culture", with periodic monitoring of effectiveness through internal and external audits and procedures compliant with the ISO 45001 standard.

The following paragraphs illustrate the strategy and business model adopted by the Company to address the main impacts and significant risks, seize any opportunities and describe the remediation and mitigation actions relating to each impact and risk, with particular reference to the following impacts:

- health and safety;
- fair and inclusive work environment;
- training and skills development;
- engagement and satisfaction of people.

S1-1

Policies related to own workforce

20-22 FiberCop recognizes the value of its human capital as an essential element for the success of the Company and for the realization of its mission. For this reason, it is committed to valuing and developing its people, promoting an inclusive and respectful work environment, in which everyone can best express their talent, regardless of racial and ethnic origin, color, sex, sexual orientation, gender identity, disability, age, religion, political opinion or social background.

FiberCop recognizes the protection of Human Rights as an essential principle for the responsible conduct of its business and for the creation of sustainable value in the long term. The Company is committed to ensuring that all FiberCop people operate in an environment based on respect, integrity and individual dignity. FiberCop's commitment is shared with all stakeholders through its institutional Human Rights Policy (better described in ESRS 2 G1-1) which applies to all FiberCop staff, regardless of role, seniority or location, and is based on the main international references, including the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the ILO Fundamental Conventions and the OECD Guidelines. The same references and principles are the basis

of FiberCop's Code of Ethics (better described in ESRS 2 G1-1) which applies to all FiberCop persons, members of the corporate bodies, members of the Supervisory Body, collaborators, consultants, suppliers and partners who establish direct or indirect relationships with the Company or in any case operate to pursue corporate objectives, No one excluded. The Company has also adopted an organisational, control and management model pursuant to Legislative Decree 231 of 2001 in addition to the whistleblowing channel, to which FiberCop people can also forward any complaints of Human Rights violations (see ESRS 2 G1-1).

FiberCop's approach to the protection of Human Rights is declined in the next four main dimensions which include what is also expressed in the Human Rights Policy.

- **Inclusion, non-discrimination and equal opportunities.** FiberCop actively promotes a fair, inclusive and respectful work environment, ensuring that each person can fully contribute to the company's development. The Company rejects any form of discrimination based on racial and ethnic origin, color, sex, sexual orientation, gender identity, disability, age, religion, political opinion or social background, in line with its Human Resources policies, the Gender Equality Manual and the founding principles of the corporate culture.

- **Health and safety as a strategic responsibility.** The protection of people's health and safety is guaranteed through certified management systems, rigorous operating protocols and prevention plans developed in line with current legislation. FiberCop promotes safe and conscious behavior also through continuous training, innovative digital tools and the involvement of Workers' Safety Representatives.
- **Decent working conditions and fair industrial relations.** FiberCop guarantees fair, transparent working conditions that comply with the rights enshrined in national legislation, international conventions and the ILO CCNL. The Company protects freedom of association and the right to collective bargaining, ensuring a constant, structured and collaborative dialogue with the Trade Unions.
- **Absolute prohibition of child and forced labour.** The Company does not tolerate forms of exploitation, coercion or involuntary labour. Systematic checks on internal processes and documentary checks are in place to prevent any form of abuse.
See also SBM-3 14b.

The Human Rights Policy is drawn up and updated by the Sustainability department and is the

responsibility of the Human Resources department for employee involvement and of the Compliance department for the control of non-conformities. FiberCop people receive dedicated training, including through onboarding programs, digital paths and internal communication systems. FiberCop provides a confidential whistleblowing channel (better described in ESRS 2 GOV-1), accessible and compliant with regulations, which guarantees protection from retaliation and full confidentiality. The effectiveness of the relevant Policy is monitored through tools for listening to the Company's population and continuous improvement activities. **23** FiberCop pays the utmost attention to health and safety in the workplace, ensuring full compliance with the relevant legislative provisions and adopting strict measures and protocols to ensure a safe and secure environment, in line with the best practices in the sector. The Managerial Safety Steering Committee was also set up with the mandate to ensure the definition of strategic health & safety objectives and oversee the vertical action plans of the individual employers' lines and transversal actions, monitoring the progress of the plans and ensuring the sharing of specific activities aimed at promoting the safety culture and virtuous behaviour in terms of safety and health; it is chaired by the Chief Corporate Officer and operationally coordinated by the head of the Health, Safety & Environment

department, provides for the participation of the Chief Technology & Operations Officer, in his capacity as Employer pursuant to the legislation on safety and health in the workplace and also provides for the stable participation of all first-line managers of the corporate organisation, together with the Head of the Real Estate department, confirming full managerial oversight of the matter.

The Company guarantees full compliance with the legislative provisions on health and safety at work aimed at preventing possible injuries and damage to health in any way related to work performance. In order to guide and make the company's action on Occupational Health and Safety issues incisive, with a view to full integration with the more overall business strategies, FiberCop transfers its approach to all stakeholders also through the Health & Safety Policy which sets out the principles illustrated in the table.

HEALTH & SAFETY POLICY

Principles	Correlation with ESRS S1	Regulatory references
Ensuring the safety, quality, and livability of work environments, effective management of facilities in line with new agile work models, sustainability, and efficient use of resources	S1-4	Legislative Decree 81/08; ISO 45001
Promoting the prevention of accidents, occupational diseases, and near misses through technical and organisational measures and by verifying their effectiveness	S1-4	Legislative Decree 81/08; ISO 45001; 231 Compliance Model
Defining a reference framework for the telecommunications sector, with occupational health and safety (OHS) objectives for both internal and external personnel	S1-5, S1-14	Legislative Decree 81/08; ISO 45001; Sector-specific regulations
Ensuring full compliance with legal provisions and mandatory requirements regarding the protection of health	S1-1, S1-4	Legislative Decree 81/08; Health and safety legislation
Promoting the progressive elimination/reduction of risks by adopting best practices, and containing emerging risks	S1-1, S1-4	Legislative Decree 81/08; Sector-specific regulations
Empowering Company's people in their daily activities to work toward the elimination and reduction of occupational health and safety risks, prioritizing activities, materials, equipment, PPE, and technical measures with the lowest risk impact. Training activities provided in support	S1-2, S1-4	D.Lgs. 81/08; ISO 45001; State-Regions Agreement
Pursuing the continuous improvement of performance in terms of occupational health and safety (OHS)	S1-1, S1-4	Legislative Decree 81/08; ISO 45001
Ensuring the selection, management, and monitoring of contractors and suppliers, fostering dialogue and the sharing of good practices	S1-1, S1-4, S1-5	Public Procurement Code; D.Lgs. 81/08; FiberCop Supplier Policy
Promoting the participation of workers and their representatives to ensure transparent and periodic communication and to foster a culture of safety	S1-2	Legislative Decree 81/08; ISO 45001
Periodically informing stakeholders about OHS activities and objectives, to ensure transparency and promote a shared culture of safety	S1-1	Legislative Decree 81/08; ISO 45001

The Health & Safety Policy was approved and signed by the Chairman/CEO of FiberCop, is published on the institutional website to ensure maximum dissemination and is aimed at the entire Company's population.

RA 25e FiberCop is committed to respecting and promoting the Human Rights of all stakeholders involved in its activities, in accordance with the provisions of the Company's Human Rights Policy, the Code of Ethics and the relevant Company's policies described above. In addition to the protection of Human Rights and the Health and Safety of its people, FiberCop has built an organic and integrated system of policies dedicated to the management, enhancement and protection of its people, recognizing that a fair, respectful and inclusive workplace represents a strategic factor of competitiveness and an essential prerequisite for the creation of sustainable value. The various policies adopted define principles, responsibilities and processes that guide organisational behaviour and ensure consistency with corporate values, with the relevant regulatory framework and with national and international standards on Human Rights, equal opportunities, health and safety, ethics and integrity.

24a A summary view of the objectives and scope of the policies whose implementation is guaranteed by the Chief Human Resources Officer is provided below. In particular:



- the Human Resources and Equal Opportunities policy defines the rules for the correct management of all FiberCop people; it represents the reference for the best management and promotion of human resources and illustrates the principles that everyone must be inspired by in the management of both internal and external activities and relationships;
- the Disability and Frailty policy defines activities and processes aimed at promoting conditions that allow the elimination of cultural and organisational barriers that limit the full participation, growth and development of the potential within the organisation of people with disabilities. It applies to all FiberCop people. Direct recipients include FiberCop people with disabilities, chronic/disabling diseases and SLD (specific learning disorders). Indirect recipients include all those who are owners of processes related to disability, managers and managers involved in disability training courses and professionals on inclusive design and accessibility;
- the Gender Equality Management Manual describes the gender equality management system adopted and developed by FiberCop, according to the UNI/PdR 125 reference practice, to promote and protect diversity and equal opportunities in the workplace, measuring progress and results through the preparation of specific KPIs which are reported in official documents.

POLICIES OF FIBERCOP SCOPE S1	MATERIAL SUB-THEMES IN THE S1 AREA				POSSIBLE GROUNDS FOR DISCRIMINATION COVERED BY THE FIBERCOP POLICIES										
	Health and Safety	Fair and inclusive work environment	Training and skills development	Engagement and satisfaction of people	Racial and ethnic origin	Skin color	Gender	Sexual orientation	Gender Identity	Disability	Age	Religion	Political opinion	National ancestry or social background	Other forms of discrimination covered by EU law and national law
Code of Ethics	●	●		●	●	●	●	●	●	●	●	●	●	●	●
Human Rights Policy	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●
Health and Safety Policy	●														
Human Resources and Equal Opportunities Policy		●	●	●	●	●	●	●	●	●	●	●	●	●	
Disability and Frailty policy		●		●						●					
Gender Equality Manual UNI/PdR 125		●			●	●	●	●	●		●	●	●	●	
Guidelines for the Hiring Process		●													
Harassment Incident Management Guidelines	●	●			●	●	●	●	●		●	●	●	●	
Whistleblowing	●			●											

- the Guidelines for the Hiring process aim to provide the framework for the management of the selection of new people and to ensure the governance of the entire process, monitoring its effectiveness and efficiency in accordance with the provisions of the Code of Ethics, the 231 Organisational Model, the Anti-Corruption Management System and the Anti-Corruption Policy. The guidelines apply to both external and internal recruiting;
- the Guidelines for the management of episodes of gender, sexual harassment and bullying formalize the process and paths aimed at preventing, reducing and otherwise managing episodes committed both inside and outside Society. They concern both conduct carried out towards FiberCop people and towards Third Parties in the performance of their work activities, whatever the type of relationship established and the role held.

The table summarises all the policies for the management of material sub-topics in the S1 area, including **24b** the view on the monitoring of possible reasons for discrimination.

S1-2 Processes for engaging with own workers and workers' representatives about impacts

25 FiberCop has established a formal and continuous system of workforce involvement, based on internal procedures aimed at ensuring the structured, documented and verifiable collection of workers' interests with respect to the actual and potential impacts that affect them. This system is integrated into the procedural framework of governance and in the management of HRO processes, ensuring consultation and documentary evidence phases and restitution phases.

FiberCop ensures the dissemination of clear, understandable and accessible information to workers through an articulated system of communication channels, designed to encourage the active involvement of the workforce and ensure a participatory and inclusive approach, in line with the continuous listening process adopted by the Company.

FiberCop systematically considers potential obstacles to worker involvement in training and development initiatives, adopting organisational measures and operational solutions aimed at ensuring accessibility, inclusiveness and equal opportunities for participation.

To this end, the Company provides training editions equipped with accessibility tools, designed to meet different needs and to encourage the participation of people with temporary or permanent limitations.

27 The involvement of its workforce is implemented directly through digital tools for periodic consultation, including dedicated internal surveys, uniform communication channels throughout the population and Company's platforms through which workers can express observations, reports and evaluations on relevant issues. These tools constitute formal mechanisms for acquiring information, used for the purpose of assessing the impacts on its people and planning management measures. In 2025, FiberCop launched an Inclusion Survey as part of the Diversity & Inclusion Plan, aimed at promoting a fair, inclusive and diversity-friendly workplace, preventing all forms of discrimination and promoting equal opportunities for participation, development and enhancement of people, including those in the most vulnerable conditions. The survey recorded a participation rate of 61%, confirming the effectiveness of the listening tools adopted.

The training activities, better described in S1-13, provided in accordance with the provisions of the internal skills management system, constitute an additional tool for direct involvement, as they

provide formal moments of verification and restitution, departmental to collect useful elements for the management of impacts and the evaluation of the effectiveness of the measures adopted. Some training programs also include Project Work, understood as group work and structured moments of sharing and evaluation, which favor the practical application of the knowledge acquired, collaboration between participants and a greater level of active participation.

To support the processes of involvement and continuous improvement, FiberCop uses satisfaction questionnaires aimed at verifying the level of involvement of participants and collecting suggestions to be integrated into the design of subsequent training initiatives.

The training modules focus on both ethical, sustainability, compliance and information issues, - for example on IT risks, IT security that affect the entire corporate population - and courses of a specialised nature, aimed at risk or vulnerable categories. In this context, the Company ensures the design and continuous provision of specific training plans on Health, Safety and Environmental issues, with the aim not only of complying with legal obligations, but also of strengthening risk awareness, preventing exposure situations and promoting safe and responsible behaviour, with particular attention to the most critical operating contexts.

Workers are also involved in health and safety issues both in an informative and active way: in 2025, a QR code was posted in the Company's spaces to report cases of near miss⁵ to HSE, a useful tool for preventing injuries.

The HRO department, through its Industrial Relations division, also ensures the systematic involvement of the Unitary Trade Union Representatives (RSU) and the Workers' Safety Representatives (RLS) through dedicated consultation and discussion tables, set up at national and territorial level, concerning the organisational, operational and strategic issues capable of producing impacts on its workforce.

These tables are configured as official and verifiable tools of involvement, to which the Company assigns a preventive monitoring department in relation to risks and impacts in the workplace.

26 The contributions deriving from the involvement of workers collected through the mechanisms described above are integrated into Company's processes, through their systematic analysis and subsequent incorporation into the activities of identification, assessment and management of significant impacts. This integration takes place in a documented manner, ensuring the traceability

of evidence to the information source and the traceability of its use in decision-making processes.

The RSUs and RLS participate in the consultative phases provided for by the relevant regulations and internal procedures, ensuring that their points of view are acquired, examined and taken into consideration before the adoption of decisions regarding organisational structures, operating models, working conditions, hours and initiatives with a potential impact on the workforce.

The evidence collected through the engagement processes contributes to the definition and updating of policies, objectives and action plans relating to health and safety, inclusion, organisational well-being, skills development and risk management. The integration of workers' contributions takes place in advance (ex ante), contextual and subsequent (ex post), in compliance with the principles of transparency, proportionality and adequacy.

By way of example, in 2026 the Company will proceed with the revision of the corporate welfare plan based on the evidence that emerged from the Inclusion Survey conducted at the end of 2025.

The results, appropriately analyzed and documented, guided the updating of flexible benefits initiatives, providing greater freedom for

employees in the allocation of the assigned "wallet", in line with the objectives of well-being and inclusion. In addition, the opinions, reports and evidence provided by workers and/or their representatives are included in the risk assessment processes, in the phases of updating the Risk Assessment Documents, in the analyses relating to HSE events (injuries, near misses, risk behaviours, situations of vulnerability) and in the definition of corrective, preventive and improvement measures.

27a The involvement of its workers also takes place, as anticipated, through the workers' representatives.

27b At national level, meetings with workers' representatives do not follow a fixed time interval, but are held on the basis of the needs that arise from time to time to the Company or the trade union.

At the local level, the Trade Union Relations department has constant dialogue with the trade union representatives to address issues of support for the organisation of work, for information activities and to respond to any reports received from workers through the union.

27c The Trade Union Relations department is responsible for ensuring the appropriate involvement of the Trade Unions (OO.SS.) at central and territorial level, sometimes also involving other Company's

⁵ A near miss is an unplanned event that had the potential to cause injury or damage to people, property, the environment, or operational processes, but which did not result in negative consequences solely due to fortuitous circumstances.

departments to ensure timely information on the projects for which it is responsible and/or on the Company's reorganisations that are required. **27e** The Trade Unions constantly organise meetings during which they disclose to employees the information received from the Company on FiberCop's initiatives and projects in progress and/or future implementation.

The Company can assess the effectiveness of employee involvement through the content of the press releases to staff issued by the union, as well as the number of possible contrast actions implemented in the event of strong disagreement between the parties.

28 The Company has made available both with the Company's contract defined with the Trade Unions, and through internal regulations, a series of protections, additional and specific permits (e.g. parental leave, the increase of the protected period in the event of illness) aimed at protecting vulnerable people, due to illness or other contingent events.

27 FiberCop, in compliance with and in accordance with the provisions of the law and the tlc National Collective Bargaining Agreement, pursues a model of Industrial Relations based on the search for dialogue and constructive and participatory confrontation with the Trade Unions, in the common belief that a system of dynamic and qualified industrial relations represents a development factor capable of positively affecting the economic-productive system and allows it to face

the challenges and consequent changes in work, with a view to enhancing their people.

Therefore, it adopts an Industrial Relations Protocol signed on 27 November 2024 with the Trade Unions. The agreement identified 20 production units (coinciding with the Italian regions) and defined, with two levels of national and territorial comparison, a model divided into three areas:

1. information, aimed at promoting the dissemination of business scenarios, Company's programs and the consequent organisational choices;
2. consultation, aimed at sharing knowledge of specific subjects with the aim of designing initiatives and identifying common solutions and is carried out through the Joint Bodies;
3. negotiation, aimed at reaching agreements that identify useful solutions to manage the processes of evolution of the market, of the Company and aiming at the enhancement of people.

The bodies that make up the Industrial Relations system of FiberCop S.p.A. are:

- Unitary Trade Union Representatives, composed of 222 RSUs (i.e. Italian workplace union representatives);
- Workers' Safety Representatives, composed of 76 RLS (i.e. Workers' Safety Representative);
- National RSU coordination composed of 57 RSUs;

- National Joint Committee for Safety and Health;
- National Commission for Welfare, Equal Opportunities and Inclusion;
- National Training Committee.

To facilitate discussions, FiberCop recognizes the Trade Unions hours of leave in addition to those required by law.

During 2025, on the basis of the results obtained from the comparison with their workforce through their representatives, the following trade union agreements and consultations meetings were signed with the trade unions:

- agreement signed on 24 July 2025 for the definition of the Performance Bonus valid for the period 2025-2027;
- agreement signed on 24 July 2025 to overcome the experimentation of clocking in at the workstation and remote coaching;
- agreement signed on 30 July 2025 for the recognition of the individual salary supplement included in fixed compensation (*superminimum*) absorbed by TIM in 2021;
- consultation meeting of 3 December 2025 for the definition of the new timetables and organisation of work related to the Milan Cortina Olympics.

S1-3
Processes to remediate negative impacts and channels for own workers to raise concerns

32a,b,c,d,e FiberCop always maintains an active communication channel with the unions through which the union representatives can convey any concerns and/or requests from workers in general, in order to clarify positions and try to pursue the most appropriate solutions. The Company provides the Trade Unions with special physical spaces in all FiberCop offices and a space on the Company's intranet to allow the dissemination of trade union communications to all employees. As regards the formal means by which the Company's own workforce can make its concerns and needs known directly to the Company and/or by which the company makes these channels available, as well as the way in which workers will be given feedback on the issues raised, and the effectiveness of these channels, see G1-1 (10 a-c).

33 In 2025, a company survey was carried out on knowledge of the whistleblowing channel, with the aim of assessing the level of knowledge, trust and willingness of people to use internal reporting channels. The results that emerged outline an overall mature and transparency-oriented context.

Most people say they are familiar with whistleblowing channels (82.5%) and trust in their proper management (84.3%). Particularly significant is the willingness to report non-compliant behavior, expressed by 96.2% of respondents.

Alongside these aspects, some areas of attention emerge: 47% of the sample reports possible fears of retaliation, while 50% say they have never encountered problems considered serious enough to require reporting. For further details, please refer to G1-1.

Overall, the results confirm a solid basis on which to further develop initiatives to raise awareness and consolidate corporate integrity safeguards.

S1-4
Taking action on material impacts on own workforce, and approaches to mitigate material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

37 To create a resilient, inclusive, and people-oriented workplace, FiberCop has implemented a series of concrete initiatives that represent the implementation of the policies and strategies outlined. These measures have been designed to address the relevant impacts and risks described in ESRS 2 SBM-3, while seizing the opportunities for improvement identified. These actions were launched by FiberCop in 2025 and are also planned for 2026 to mitigate short, medium, and long-term impacts and risks. In addition, in relation to the opportunity identified, FiberCop has launched an in-depth study of the evolution of organisational models and the methods of carrying out work performance, with particular attention to operational flexibility profiles.

This area is considered an integral part of the path of organisational transformation and adaptation to technological and contextual changes, with the aim of making work processes more consistent with the production needs and professional dynamics of people.

Health and Safety

38 Occupational health and safety represent a fundamental pillar for FiberCop, particularly considering the nature of the activities carried out in the telecommunications and network infrastructure sector. The Company operates in strict compliance with current regulatory provisions, including first and foremost Legislative Decree 81/2008 and the State-Regions Agreement (April 2025), recognizing continuous education, updating and training of personnel as essential elements for risk prevention. This commitment takes the form of the provision of training courses dedicated to all Company's levels, aimed at providing the skills necessary to operate safely, reduce the risk of injuries and spread a widespread culture of prevention⁶.

Investment in health and safety is not considered exclusively a regulatory obligation, but a strategic value, aimed at ensuring a safe working environment, protecting people and supporting the

continuity and efficiency of company activities and which is expressed in the actions that follow.

The effectiveness of these actions is monitored through audits and controls, KPI monitoring, multi-level operational checks and structured reporting with improvement actions.

The financial resources dedicated to the Health and Safety initiatives described above are defined annually through the business planning process, including operating costs and investments necessary to support the planned activities and for 2025 amounted to approximately 1.5 million euros.

These are accompanied by the annual budget managed by FiberCop's Real Estate department, dedicated to Safety activities, which aim to ensure safety in the workplace through interventions to improve indoor and outdoor spaces, in compliance with Legislative Decree 81/08. The activities include infrastructural adjustments, microclimate optimization, updating of systems (elevators, fire-fighting, lighting, electrical, air treatment), as well as sanitation, environmental remediation and seismic vulnerability checks.

The resources committed to this activity in terms of capex in 2025 amount to 26 million euros.



⁶ In 2025, the total number of mandatory and nonmandatory HSE training hours exceeded 120,000 hours.



SAFETY CULTURE PROGRAM

The Safety Culture Program aims to promote a widespread, aware and participatory safety culture, in line with the principles of the UNI EN ISO 45001 standard, which requires organisations to actively support culture, leadership and participation in health and safety. The Program consists of integrated communication, awareness-raising, engagement and operational oversight initiatives, aimed at promoting safe and conscious behaviour and consolidating the active role of all workers in prevention. Communication and awareness campaigns were carried out (production of new content, infographics, informational videos, etc.). In addition, the institutional event 'Safety Day – Health and Safety: conscious choice, shared commitment' was held, both in person and via streaming, involving Senior Management and the entire Company population to highlight the strategic importance of HSE and the Company's commitment to protecting its people.



CARDIOPROTECTION PROJECT

"Dalla parte del cuore" campaign, Limited in 2025 to the Rome office, for voluntary adherence to Basic Life Support and Defibrillation (BLS/D) training, with the aim of creating engagement and increasing the number of trained employees. BLS/D course sessions were delivered at the Rome auditorium for about 200 employees. In 2026, a new cycle of integrated First Aid and AED training is planned, with further progressive extension to the main company sites.



PREVENTION SYSTEM

FiberCop has introduced the HIPO – High Potential Incidents model in its Health and Safety Management System, a methodological framework aimed at identifying and monitoring those events that, although they have not generated a serious accident, have a high potential for damage. This model makes it possible to focus attention on highly critical scenarios and to adopt targeted preventive measures, significantly contributing to the reduction of residual risk and the continuous improvement of safety performance.



OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM

FiberCop continues the process of consolidating and maintaining the Occupational Health and Safety Management System (OHSMS) certified ISO 45001:2018 through systematic audits and controls, a new governance of operational controls, ESG and HIPO KPI monitoring activities, digitized health surveillance, training and safety culture and structured reporting with improvement actions.



NEAR MISS PROJECT

A dedicated program was launched to strengthen and disseminate a culture of voluntary, rapid, and accessible reporting of potentially hazardous events. In particular, an experimental system based on QR codes was introduced, initially activated at the Rome office Company's with progressive extension to the remaining company sites.

Enhancement of people

38 To create a resilient, inclusive and people-oriented workplace, FiberCop has implemented a series of concrete initiatives that represent the implementation of the policies and strategies outlined.

To this end, the Company has dedicated 64,557 hours of training on the topics of UNI/PdR 125, gender, gender equality and inclusion, an important

commitment aimed at creating a workplace capable of facing present and future challenges.

The actions apply to the entire organisation with specific declinations that take into account fragile or vulnerable people.

Training represents a strategic lever to accompany the evolution of the business and support the technological and organisational transformation of the Company.

Structured paths that integrate technical, digital and transversal skills are promoted, with the aim of ensuring that people have adequate instruments to adapt to changes and contribute to the competitiveness of the organisation.

For details on the type of training and the relative involvement of employees in terms of number and hours, see S1-13.

DIVERSITY & INCLUSION

FiberCop promotes a respectful, inclusive workplace oriented towards people's well-being through structured initiatives to prevent harassment, enhance gender balance and protect diversity.

The commitment takes the form of collaboration with specialised associations and foundations (PARI, Libellula Foundation, Valore D and Onda Foundation), adherence to manifestos (Hostile Words and Winning Women) and awareness-raising initiatives in presence throughout the Country (GET – Gender Equality Talks) and the implementation of mandatory and optional training plans on harassment, discrimination and inappropriate behavior.

The Company has activated various support and reporting tools, including the Person of Trust, the psychological listening desk, legal advice, whistleblowing channels and a network of Ambassadors trained in the area, guaranteeing confidentiality, absence of retaliation and accompaniment in sensitive situations.

This approach is reinforced by operational guidelines, procedures also dedicated to the management of disabilities and situations of fragility and by the achievement of UNI/PdR 125 certifications on gender equality and ISO 30415 on Diversity & Inclusion, confirming the Company's concrete and structured commitment to these issues.

FiberCop adheres to the United Nations Global Compact, with particular reference to the Target Gender Equality (TGE) initiative, and plans to sign the Women's Empowerment Principles (WEPs) in the future.

A culture of continuous, accessible and inclusive learning is also enhanced, aimed at fostering professional growth, autonomy and the ability to innovate. The empowerment of people is a central element of the organisational model: through targeted initiatives, responsibility, a sense of participation and widespread leadership are strengthened, contributing to organisational well-being and the achievement of strategic objectives.

Potential Assessment initiatives are also part of this context, to support talent management and managerial development paths. In 2025, 60 assessments dedicated to entry-level managerial positions (Agile Assessment) and 53 assessments aimed at roles of responsibility with managerial weight (Managerial Assessment) were carried out, in order to enhance distinctive skills and guide growth and succession choices in a structured way. The engagement initiatives promoted by FiberCop are designed with the aim of improving people's quality of life and promoting well-being in both the work and personal spheres. The Company considers work-life balance a fundamental pillar for organisational well-being. An effective work-life balance policy allows people to manage their professional responsibilities and personal or family needs in a balanced way, contributing to a positive and sustainable working climate.

The care actions adopted by FiberCop are based on an approach that goes beyond the

simple provision of services, focusing on:

- empathy and attention to individual needs;
- active listening;
- the construction of communities as a tool for empowerment and sharing of interests and experiences;
- the enhancement of human relationships as a key factor of well-being.

39 FiberCop has defined a structured process for the identification and management of the necessary and suitable actions in response to actual or potential negative impacts on its workforce, taking into account the nature and level of involvement of the Company with respect to the impact detected. In particular, the process distinguishes cases in which FiberCop:

- causes or directly contributes to a material adverse impact, or
- is indirectly involved, as the impact is connected to its operations, products or services through commercial relationships or organisational processes.

The identification of appropriate actions takes place through a process that allows you to:

- detect and analyze any deviations from regulatory, organisational or Company's policy requirements;

- assess the root causes of actual or potential negative impacts;
- define and implement corrective actions proportionate to the severity and nature of the impact.

The actions identified may include updating policies and procedures, activating training or awareness-raising initiatives, as well as strengthening organisational and control safeguards, in order to prevent the recurrence of non-conformities and mitigate the effects on the individuals involved.

Through this approach, FiberCop ensures that responses to negative impacts on the workforce are consistent, traceable and oriented towards continuous improvement, in line with the principles of responsibility, equity and protection of people.

40 FiberCop has identified among the significant risks associated with its workforce those related to diversity and inclusion which, if not adequately managed, can generate negative legal, reputational, organisational and operational impacts as well as affect the company's dependencies in terms of attractiveness, continuity of skills and organisational stability.

In particular, ineffective management of diversity and inclusion policies can lead to:

- legal and sanction-related risks in the event of intentional or systemic discrimination incidents,

as well as cases of harassment resulting in complaints, litigation, and reputational damage;

- difficulty in attracting and retaining talent, with negative impacts on the competitiveness and innovation capacity of the Company.
- deterioration of the organisational climate, with possible effects on productivity, people's well-being and increased turnover;
- loss of trust on the part of investors and stakeholders, in a context characterized by growing expectations in terms of transparency and social responsibility.

To mitigate these risks, FiberCop has planned and implemented structured actions that include:

- the adoption and updating of policies and guidelines on diversity, inclusion, equal opportunities and the protection of people;
- the implementation of training programs and awareness-raising initiatives on the issues of non-discrimination, respect and inclusion;
- the integration of the principles of diversity and inclusion in human resources management processes including skills development, talent enhancement and engagement.

The effectiveness of the actions adopted is verified through monitoring and evaluation processes that include tools for listening to the workforce, reporting

systems, internal and external audits and analysis of organisational indicators (e.g. internal climate, participation in initiatives, turnover), making it possible to promptly identify any critical issues and activate corrective actions. In this regard, FiberCop has identified more specific objectives in S1-5. FiberCop also takes into account external developments – regulatory, social and market – that could transform workforce-related dependencies into emerging risks, adapting its policies and actions accordingly. The risk management processes associated with the company's workforce are also integrated into the company's risk management processes, in order to ensure a systematic, coordinated and continuous assessment of the risks and opportunities related to the impacts on the workforce.

43 FiberCop assigns specific organisational, information and instrumental resources to support the management of significant impacts on its workforce, with the aim of ensuring effective access to information, encouraging people's involvement and supporting the implementation of initiatives in the areas of inclusion, well-being and development. In particular, the Company provides a page dedicated to inclusion on the Company's intranet, enriched with news and informative content, as a communication and awareness-raising tool on the issues of diversity, inclusion and initiatives aimed at the workforce.

To support training and skills development activities,

FiberCop uses the Learning NOW platform which allows the delivery, management and monitoring of training courses, promoting a structured dissemination of training initiatives and continuous access to content by workers.

The communication of welfare and wellbeing initiatives is supported by the ENNE brochure, dedicated to the corporate welfare and well-being plan, which represents an information resource aimed at making the measures made available to people usable and understandable.

In addition to these tools, FiberCop uses mass dissemination of e-mail communications, aimed at ensuring timely information to workers on the initiatives, opportunities and actions taken to manage significant impacts. Through the coordinated use of these resources, FiberCop ensures the information and operational oversight of initiatives in favor of its workforce, contributing to a structured, accessible and consistent management of significant impacts.

41 RA37 The Company shall also ensure that its actions and practices do not cause or contribute to causing significant negative impacts on its workforce, and shall adopt an approach aimed at preventing or mitigating tensions should they occur.

The Trade Union Relations department together with Trade Unions follow the legal procedures to jointly analyze and implement any measures aimed at safeguarding the employment perimeter.

In 2025, the conditions that made it necessary to resort to social safety measures did not occur.

RA 40a The Trade Union Relations department plays a role of prior disclosure of information to the union if the Company initiates significant projects or operational plans. Trade Unions can intervene by opening a negotiating table on the matters provided for by the tlc CCNL as well as on matters of common interest, such as working hours, methods of carrying out the service.

By way of example, trade union tables were opened in 2025 relating to the following topics:

- 7 July 2025 illustration to the National Secretariats and subsequently to all territories of the new model of availability in FiberCop;
- 28 October 2025 illustration and rationale of the organisation of work in the Operations area and new professional figures;
- 20 November 2025 launch of a company-trade union technical commission for the definition of the new Agile Work business model.

S1-5 **Targets related to managing material negative impacts, advancing positive impacts and managing material risks and opportunities**

46 In line with the actions described and with the issues managed through corporate policies, FiberCop has defined specific objectives in the areas of health and safety and gender equality, aimed at managing the significant impacts, risks and opportunities related to its own workforce.

For the calculation of the "Gender Diversity" target for Executive Managers, only individuals holding managerial positions are considered, excluding the Chief Executive Officer and C-level roles (131 people).

With regard to injuries, FiberCop considers a "non-mitigable injury" as any harmful event occurring to an employee during working hours, linked to accidental circumstances arising from a generic risk not specifically related to the activity performed, which— even after implementing all reasonably applicable prevention and protection measures — cannot be further reduced or avoided. Conversely, a "mitigable injury" is defined as a harmful event

whose risk is strictly related to the work activity and to specific working or environmental conditions, and whose likelihood and severity can be reduced through the adoption of reasonably applicable prevention and protection measures. The indicators (LTIR – Lost Time Injuries Rate) here reported include, in the numerator, mitigable injuries and, in the denominator, the total number of hours worked, which in 2025 amounted to 29,035,160.

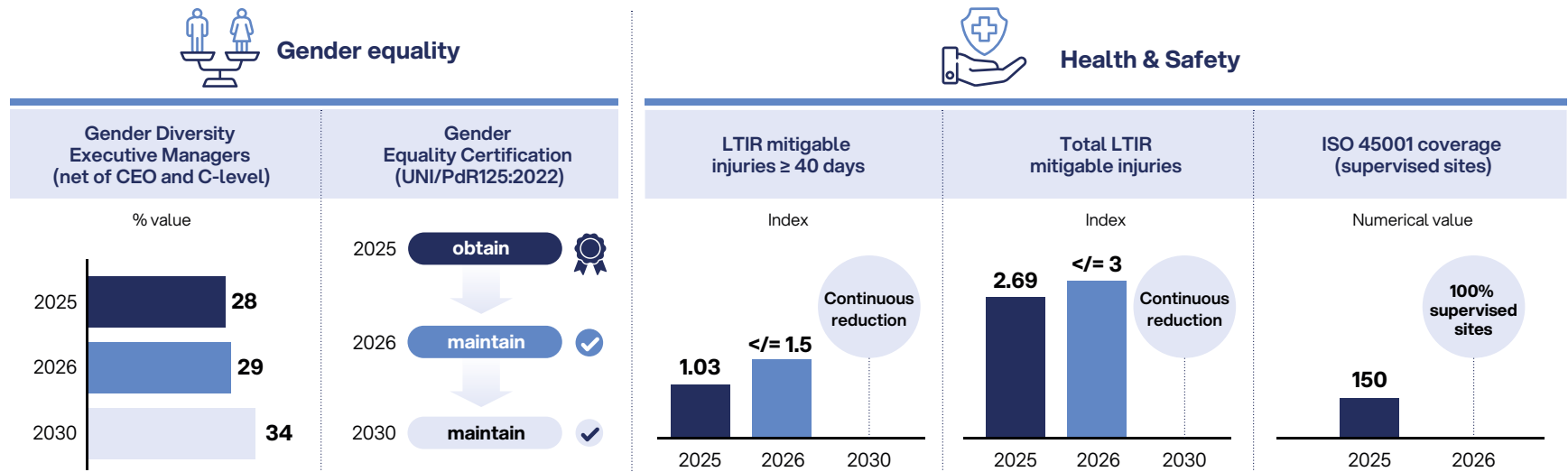
47a Within the scope of Occupational Health and Safety management, FiberCop defines its H&S targets through a formalized process integrated into

its Occupational Health and Safety Management System (OHSMS). The definition of objectives follows a risk-based approach, in line with the provisions of the Risk Assessment Documents (DVR) and in compliance with corporate policies and applicable standards. The process includes structured moments of consultation and discussion with the competent functions and involved stakeholders (Company Occupational Physician, Workers’ Safety Representatives, National Joint Committee, etc.), who contribute through technical analyses, injury data, performance indicators, and

contextual assessments. The outcomes of these activities feed into the OHSMS review cycle and support the definition of annual targets, which are approved by the HSE governing bodies and integrated into operational plans and internal performance monitoring systems.

The objectives thus defined take into account the main impacts and risks identified, promote the continuous improvement of workers’ health and safety conditions, and ensure alignment with the requirements set out by ESRS standards and current health and safety legislation.

ESG PLAN '26 - '30





47b,c The monitoring of HSE indicators and targets is ensured by the department responsible for the Occupational Health and Safety Management System, which oversee the collection, analysis, and validation of data, in coordination with the

cross functional working group responsible for the implementation of ISO 45001. Evidence from internal audits, incident analyses, and periodic compliance checks is consolidated and used as input for the Management Review, ensuring traceability,

methodological consistency, and compliance with ESRS requirements, while also supporting the continuous improvement of the OHSMS.

46 Further objectives relating to training and skills development and the protection of a fair and inclusive environment insist on the systematic monitoring of the population involved in training courses on gender issues, in order to detect participation, socio-demographic characteristics, levels of learning and skills produced by training.

Monitoring makes it possible to assess the effectiveness of the interventions carried out, guide the continuous improvement of training activities and produce useful evidence for the purposes of UNI PDR 125 and ISO 30415 certifications. In 2025, 18,276 people were trained. With regard to the oversight of a fair and inclusive environment, the goal of overseeing 100% of the whistleblowing channel reports received in 2025 is achieved.

47a The need for training on gender issues, developed in 2025, was already highlighted in 2024 following the survey on the Company population.

47b,c The workforce was directly involved through the administration of post-training satisfaction questionnaires. The results collected were examined to identify areas for improvement, promote organisational learning and guide the planning of future training and skills development initiatives.

CHARACTERISTICS OF FIBERCOP'S EMPLOYEES AT THE END OF THE PERIOD

Characteristics of employees by type of contract	u.m.	Women	Men	Other	Not communicated	Total
Number of permanent employees (50bi)	n	4,253	14,021	0	0	18,274
Number of temporary employees (50bii)	n	1	1	0	0	2
Number of variable time employees (50biii)	n	0	0	0	0	0
Total	n	4,254	14,022	0	0	18,276

CHARACTERISTICS OF FIBERCOP'S EMPLOYEES, AVERAGE OF THE ENTIRE PERIOD

Characteristics of employees by type of contract	u.m.	Women	Men	Other	Not communicated	Total
Number of permanent employees (50bi)	n	4,298	14,271	0	0	18,570
Number of temporary employees (50bii)	n	1	1	0	0	1 ⁷
Number of variable time employees (50biii)	n	0	0	0	0	0
Total	n	4,299	14,272	0	0	18,571

⁷ The total refers to two people employed for six months..

S1-6

Characteristics of the undertaking's employees

The workforce is one of the Company's most important strategic assets: investing in people means enhancing a wealth of professionalism, experience and knowledge that enables sustainable growth and the achievement of long-term goals.

50 FiberCop people all work throughout the Country **50a**, directing daily choices towards achieving also sustainability goals. FiberCop is aware of the responsibility as well as complexity of its role. Managing people means taking care of them, favoring well-being and dialogue, enhancing and enhancing skills in order to create a solid and focused team.

This attention extends through people and their work to the community and the environment, important stakeholders for FiberCop as well as Human Rights whose protection is central to FiberCop as enshrined in the Company's Human Rights Policy and Environmental Policy. Job stability is a necessary requirement for the positioning described above: the entire workforce, with the exception of 2 cases, has a permanent contract as better illustrated in the tables. All data presented refer to the number of people.

During the reference period, 1,710 people left the Company; 1,639 exits were voluntary, 71 non-voluntary; the turnover rate for the same period was around 9%. Details by genre are shown in the table.

50b The table illustrates the gender breakdown of FiberCop people as of 31 December 2025. The

figure refers to the average headcounts of the entire reporting period. In both cases, both part-time and full-time employees are considered. The total number of employees represented here corresponds to what is shown in the Financial Statements of FiberCop.

EMPLOYEE TURNOVER

Indicator	u.m.	Women	Men	Other	Not communicated	Total
Number of employees who have left the company	n	275	1,435	0	0	1,710
Total number of employees	n	4,299	14,272	0	0	18,571
Employee turnover rate	%	6	10	0	0	9

CHARACTERISTICS OF FIBERCOPI EMPLOYEES BY GENDER

Indicator	u.m.	Women	Men	Other	Not communicated	Total
Number of employees (number of persons), at the end of the period	n	4,254	14,022	0	0	18,276
Breakdown of employees by gender at the end of the period	%	23	77	0	0	100
Breakdown of employees by gender, average of the entire period	%	23	77	0	0	100

S1-8 Collective bargaining coverage and social dialogue

In November 2025, the renewal of the National Telecommunications Collective Bargaining Agreement, valid until 2028, was signed between Asstel, the trade association representing the telecommunications supply chain, of which FiberCop is a member, and the Trade Unions. The new contract puts people at the center of digital transformation by changing the way we look at work, with a focus on trust, competence and responsibility.

The measures envisaged by the CCNL respond to the need to accompany the digital transformation and strengthen the competitiveness of the sector.

Through the application of the tlc CCNL, the entire population of FiberCop benefits from a shared, clear and updated regulatory framework, which integrates rights, protections and development paths consistent with the needs of a rapidly evolving sector.

This contractual structure represents an enabling factor for both the well-being of people and the competitiveness of the Company, contributing to a human resources management model aligned with the requirements of the ESRS and the fundamental principles of European social dialogue.

S1-9 Diversity Metrics

64, 65 The percentage of women in the workforce, as well as in management, reflects a dynamic typical of the infrastructure and technological innovation sector, historically characterized by a strong male predominance, in line with market trends and the professional composition of the sector. The high average age of FiberCop people, on the

other hand, is the result of the Company's long history and represents a consolidated wealth of experience and professionalism supported over time by training and constant monitoring of a possible generational skills gap. The current development model pays great attention to ensuring that individual growth paths, from the moment of recruitment, are free of constraints related to gender or age. **66a** Senior management is defined as the first and second levels below the administrative and

supervisory bodies. The amounts shown in the table take into account 1st level managers (Head of Organisational Unit 3) and 2nd level (Head of Organisation Unit 4).

S1-10 Adequate Wages

69 FiberCop guarantees a remuneration policy in compliance with internal fairness and the competitiveness of the labour market. For the definition of the interventions, it complies with Italian legislation and the national collective agreements of reference, excluding any type of discrimination. In line with best practices and its Performance Management model, it implements policies and processes that aim to highlight and enhance the skills, results, and behaviors of its people. FiberCop also provides a collective variable remuneration system for employees through a "Premio di Risultato" (performance bonus), linked to Company economic and operational performance. The scheme applies to employees covered by collective labour agreements who are not beneficiaries of the individual incentive system (MBO and Sales Incentives Plan). The performance bonus was recognized in 2025 following the agreement signed with Trade Unions on 24 July 2025 for the definition of the Premio di Risultato applicable to the 2025–2027 period.

AGE DISTRIBUTION OF EMPLOYEES

Age group (66b)	u.m.	Women	Men	Other	Not communicated	Total
Number of employees under 30 years old	n	39	235	0	0	274
Number of employees aged 30-50	n	1,060	2,891	0	0	3,951
Number of employees over 50 years old	n	3,155	10,896	0	0	14,051
Total number of employees	n	4,254	14,022	0	0	18,276
Percentage of employees under 30	%	1	2	0	0	1
Percentage of employees aged 30 to 50	%	25	21	0	0	22
Percentage of employees over 50 years old	%	74	78	0	0	77

EMPLOYEES AT SENIOR MANAGEMENT LEVEL BY GENDER

Indicator	u.m.	Women	Men	Other	Not communicated	Total
Number of employees by number of people at senior management level	n	19	41	0	0	60
Gender distribution of employees at senior management level	%	32	68	0	0	100

PEOPLE WITH DISABILITIES, SUBJECT TO ANY APPLICABLE LEGAL RESTRICTIONS ON DATA COLLECTION

Indicator	u.m.	Women	Men	Other	Not communicated	Total
Number of employees with disabilities	n	244	499	0	0	743
Total number of employees	n	4,254	14,022	0	0	18,276
Percentage of people with disabilities	%	6	4	0	0	4

CAREER DEVELOPMENT

Indicator (83a)	u.m.	Women	Men	Other	Not communicated	Total
Employees who have participated in periodic performance and career development reviews	n	4,205	13,927	0	0	18,132
Percentage of employees who participated in periodic performance and career development reviews (%)	%	23	76	0	0	99%

S1-12

Persons with disabilities

77-80 A person with a disability is defined as someone who has long-term physical, mental, intellectual or sensory impairments that may hinder full and effective participation in society. This definition does not coincide with the provisions of Italian legislation regarding protected categories.

S1-13

Training and skills development metrics

81-83 During 2025, a training plan was conducted complete with learning verification tests at the end of each training module; 2025 also saw the launch of the new Performance Management, in particular in its first phase of assigning the objectives to be assessed on the dual plan of effectiveness in achieving it and behaviour acted. The new Performance Management represents an evolution in the way FiberCop manages the performance of its people. The goal is to encourage constant dialogue between managers and teams, supporting individual and organisational development through a clear process consistent with corporate values and guidelines. Performance Management is also a new and important stage in the FiberCop Journey.

This new approach aims to improve individual and collective performance through a path of positive change, in which corporate objectives are harmonized with the ambitions and needs of each person.

TRAINING AND SKILL DEVELOPMENT BY GENDER

Indicator (83b)	u.m.	Women	Men	Other	Not communicated	Total
Total number of training hours offered and completed by employees	h	183,690	592,803		0	776,493
Average number of training hours per employee	h	42.73	41.53		0	41.81

PARTICIPATION IN TRAINING AND SKILLS DEVELOPMENT BY CATEGORY

Indicator	Employees who have participated in periodic performance and career development reviews	Percentage of employees who participated in periodic performance and career development reviews (%)
Executives	119	0.66
White-collar employees	16,834	92.84
Blue-collar employees	0	0.00
Middle managers	1,179	6.5
Total	18,132	100

TRAINING HOURS AND SKILL DEVELOPMENT BY CATEGORY

Indicator	u.m.	Total number of training hours offered and completed by employees	Average number of training hours per employee
Executives	h	2,988	20
White-collar employees	h	726,329	42
Blue-collar employees	h	0	0
Middle managers	h	47,176	42
Total	h	776,493	42

FiberCop does not have a category for blue-collar employees.

TRAINING AND SKILL DEVELOPMENT BY AREA

Topics covered by the training	Training hours	Employees involved	Average hours per capita
Technical Skills	539,839	18,430	29.07
ESG - Environment, Social, Governance	195,747	18,790	10.54
Soft skills	32,253	15,253	1.74
Language skills	8,654	2,443	0.47

S1-14
Health and safety metrics

86 The percentage of workers covered by the Occupational Health and Safety Management System (OHSMS) is determined by relating the number of workers who operate on the sites subject to certification – defined in accordance with the ISO 45001 standard and formalized in the system documentation – to the total number of workers in the organisation. The scope includes activities, processes and departments as set out in the requirements of clause 4.3 of the standard, which govern the clear definition of the purpose and boundaries of the management system. The assessment of coverage is based on the provisions of the Health and Safety Management System Manual, which describes the

risk assessment processes, regulatory obligations, prevention and protection measures and the involvement of the competent Company's figures. The verification of the effective application of the OHSMS takes place through internal audits carried out according to the ISO 19011 guidelines. The audits include documentary analysis, interviews with the departments involved, operational controls in the workplace and classification of findings according to uniform criteria reported in the company procedures for planning and conducting internal audits. Methodological limitations include any organisational changes during the year, updates to the Risk Assessment Document and the evolution of processes that may affect the full integration of certain units or new activities within the Scope of the OHSMS. In addition, the analysis is subject to

physiological fluctuations in the average annual number of workers, as also noted during audits. **90** The Occupational Health and Safety Management System is certified by an independent third-party body in accordance with the ISO 45001 standard, which confirms the compliance of the system requirements, corporate procedures, and the coverage of workers included within the scope.

SCOPE OF THE OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM

Indicator (88a)	u.m.	Employees
Number of workers covered by a health and safety management system	n	13,391
Percentage of own workers covered by a health and safety management system	%	73



Compliance is verified through periodic certification, surveillance, and pre-audit activities, as documented in the ISO 45001 audit reports, ensuring alignment to the applicable regulations, including the ESRS standards, and traceability of the verifications carried out.

88b No fatalities were recorded in 2025, either among FiberCop employees or among workers employed by network contractors operating at FiberCop sites.

88c The numbers and accident rates for 2025 are shown in the table below. In 2025, the number of working days lost due to injury was 5,245 (7,805 calendar days).

In 2025, FiberCop did not receive relevant sanctions or disputes related to the application of safety regulations⁸.

88d During 2025, the Company continued to carefully monitor the phenomenon of occupational diseases, in line with internal management

procedures and the obligations provided for by INAIL regulations.

In the period under consideration, five occupational diseases were reported, all referring to the osteo-articular system. Of the five complaints submitted, one case has been recognized by INAIL, while the remaining four are still in the investigation phase⁹.

88e The number of days lost due to work-related illnesses is included in the total value reported under item 88c.

INJURIES AFFECTING THE COMPANY'S WORKFORCE

Indicator (88c)	u.m.	Full year
LTI Occupational Injuries (>1 day)	n	200
Injury rate (LTIR)	Index	6.89
Severe injuries	n	5
Deaths	n	0
Near Miss	n	11
Total Recordable Injuries ¹⁰	n	206

⁸ Penalties exceeding 25,000 euros are considered significant.

⁹ All the investigations initiated during the reporting period originated from reports submitted by a single individual.

¹⁰ Total recordable injuries also include those that do not result in lost workdays or that last less than one day.

S1-15
Work-life balance metrics

94 All FiberCop persons are entitled to leave for family reasons by virtue of social policy and/or collective agreements. It should be noted that the Company promotes a series of initiatives to support parenting so that the burdens of childcare and family commitments are increasingly shared in the parental couple. In addition, it provides for double mandatory paternity leave for new fathers by adding 10 days, 100% paid, to the 10 days of abstention from work required by law.

S1-16
Compensation metrics (pay gap and total compensation)

97a In 2025, the gender pay gap, calculated as the gap between the average pay levels (RAL or fixed salary) paid to female and male workers expressed as a percentage, has a value of 1.7%. On the other hand, calculated as required by UNI PdR 125, i.e. taking into consideration the RAL of all FiberCop resources, excluding C-Levels, the gender pay gap stands at a value of 1.1%.

In 2025, FiberCop is in an early phase of its organisational and management transformation, in

which some remuneration mechanisms - in particular the variable component linked to performance - are still characterized by transition elements.

To ensure clear, objective information that is not distorted by remuneration dynamics still in the consolidation phase, FiberCop has chosen to report exclusively on the indicator provided for by ESRS RA 101bi, based only on the basic salary.

This methodological choice reflects the desire to prevent the variable component - today not representative of a fully consolidated organisational reality - from influencing an indicator designed to understand pay gaps. With the progressive consolidation of the organisational and management

TAKING LEAVE FOR FAMILY REASONS

Indicator (93b)	u.m.	Women	Men	Other	Not communicated	Total
Employees who have taken leave for family reasons	n	480	338	0	0	818
Employees who are entitled to family-related leave	n	3,115	9,329	0	0	12,444
Percentage of employees who took leave for family reasons (93b)	%	15	4	0	0	7

transformation, FiberCop will extend reporting, in line with the maturation of internal processes, incentive mechanisms and the provisions of the ESRS Standards.

97b Therefore, calculated on the fixed component, for 2025 the remuneration ratio has a value of 18.

GENDER PAY GAP

Indicator (97a)	u.m.	Yearly value
Average gross hourly earnings of female employees	€	17
Average gross hourly earnings of male employees	€	17.3
Gender pay gap	%	1.7

S1-17 Incidents, complaints and severe Human Rights impacts

102-103a No incidents or complaints of discrimination, including harassment, were reported during the reporting period.

104 No cases of serious accidents or complaints related to Human Rights were identified.



Workers in the value chain

ESRS S2



ESRS 2 SMB-3 Material impacts, risks and opportunities and their interaction with the strategy and business model

10 FiberCop makes use of a network of suppliers that offers goods and services functional to its business using an articulated and extensive supply chain with a consequent impact on the workers who are part of it. The Company is committed to identifying the extent of these impacts and ensuring that all partners comply with and, when possible, meet minimum requirements in terms of Human Rights, social, health, safety and the environment. The strategy and business model are continuously monitored in order to adapt them to any impacts, risks and opportunities, emerging and not yet managed.

For details on the value chain stakeholder engagement process and its outcomes, see also ESRS 2 SBM-2.

Within FiberCop's value chain, the impacts that may occur within the company's supply chain are considered relevant. The impacts considered include both the workers of suppliers with whom FiberCop directly has commercial relationships (so-called tier 1) and the subcontracting chain (tier 2). Work activities are classified on low and medium risk levels, in line with the ATECO¹¹ classification criteria of the National Institute of Statistics. In FiberCop there are no activities classified as high risk.

11a,12 The processes in place involve several categories of suppliers, with more or less significant impacts with respect to ESG issues depending on the category and are attributable to¹²:

- workers who carry out their activity at the company's premises but who are not part of the company's own workforce, i.e. they are not self-employed or workers provided by third-party companies who mainly carry out recruitment, selection and supply of personnel (regulated by ESRS S1); in particular, a focus on physical health and safety aspects is reserved

¹¹ The classification of economic activities ATECO (ATTività ECONomiche) is a classification system adopted by the Italian National Institute of Statistics (ISTAT) for national economic statistical surveys.

¹² As required by the disclosure obligation ESRS 2 SBM-3.

for workers in network construction and civil and industrial infrastructure maintenance companies, categories of workers who operate mainly within Company's offices and on construction sites where network deployment activities are carried out; these are types of "labour intensive" activities that are subject to the greatest risks;

- workers working for entities in the upstream value chain of the company (e.g. workers linked to copper recovery in decommissioning activities);
- workers working for entities in the downstream value chain of the enterprise;
- workers carrying out transactions in a joint venture or special purpose vehicle in which the reporting Company is involved (e.g. ATIs¹³).

11 b With regard to the issue of risks associated with child or forced labour, FiberCop operates in Italy where current legislation prohibits minor, forced or forced labour and imposes the correct safety measures at work.

The reference to national legislation, together with the Code of Ethics, constitutes a contractual clause. In 2025, this was reinforced by the inclusion of the Environmental Policy, the Human Rights Policy and the Supplier Code of Conduct. The Code was made

public and communicated to suppliers through the Insieme Connettiamo Futuro event, as part of the Building Network programme.

11c,13 FiberCop is in any case aware that some supplier companies use suppliers with production plants in the Far East in their supply chain. In view of this, the possible potential and indirect negative impacts identified may have a systemic connotation with regard to the procurement of goods from areas at risk of Human Rights incidents.

S2-1

Policies related to value chain workers

17a,b FiberCop attributes a central role to the protection of Human Rights along the entire value chain, aware that corporate social responsibility extends beyond organisational boundaries. FiberCop's Human Rights policy applies to suppliers and their workers and defines principles, requirements and expected behaviors so that the supply chain operates in compliance with the highest standards of sustainability, legality and integrity. It is based on the main international standards (UN, OECD, ILO) and is integrated into the processes of qualification, tendering,

contracting and monitoring of related industries. The principles behind responsible supply chain management include as expressed also in the Human Rights Policy:

- respect for Human Rights and decent working conditions. FiberCop requires suppliers to adopt practices that ensure safe, inclusive and respectful work environments for people's dignity. Each supply chain partner must ensure equal treatment, non-discrimination and full compliance with current legislation;
- prohibition of Minor, Forced or Coercive Labour. The Code of Ethics, contractual requirements and qualification policies expressly prohibit the use of child labour and any form of involuntary labour. Suppliers are also required to ensure controls at the level of subcontracting, in particular in the most exposed product categories;
- freedom of association and protection of trade union rights. FiberCop requires that partners allow their workers to freely exercise their right to association and collective bargaining, in compliance with national laws and ILO conventions;
- contractual responsibility and transparency. Clauses aimed at the protection of Human

¹³ Temporary associations of companies.

Rights are included in the contracts, including documentary verifications, ESG performance control mechanisms. Contractors are required to comply with procedures, technical standards and safety requirements established by FiberCop.

17 c The Purchasing department, with the support of the Sustainability, Compliance and Risk Management departments, periodically assesses ESG risks along the value chain, with particular reference to the most exposed operating sectors (construction sites, infrastructure construction, network maintenance). Workers in the supply chain can report violations through the Company's whistleblowing channel, guaranteed by high standards of confidentiality and protection. FiberCop also promotes a path of progressive improvement of the supply chain, through training, awareness and a gradual process of strengthening the ESG standards applied to suppliers, also in view of the evolution of the European regulatory framework. The policies adopted by FiberCop aim to ensure respect for the fundamental rights of workers and the dissemination of responsible practices throughout the supply chain. All suppliers are committed to protecting Human Rights, ensuring fair, safe, inclusive working conditions free from discrimination and violations. This includes the absolute prohibition of child labour, forced labour,

forced labour or labour linked to human trafficking practices, including unlawful personal document handling or fraudulent recruitment.

FiberCop also requires that freedom of association and collective bargaining be guaranteed, that equal treatment and equal opportunities be protected, and that decent conditions in terms of hours, pay and benefits be ensured. The promotion of gender equality is a priority objective, also through reference to the UNI/PdR 125 certification. Policies include measures to prevent harassment, abuse, violence and to protect the mental and physical well-being of workers. Similarly to its workforce, FiberCop is committed to ensuring full respect for the rights and well-being of all workers within its value chain. In terms of health and safety issues, it extends the measures and protocols required by the regulations and in line with the best practices in the sector to all third-party workers.

16 This commitment and positioning towards workers along its value chain is addressed through its policies, communicated on the institutional website and through events and training aimed at the progressive engagement of the entire supply chain. In particular:

- the Code of Ethics also applies, among others, to direct and indirect suppliers for the creation of a sustainable supply chain and to contribute to the achievement of the United Nations Sustainable Development Goals, respecting

Human Rights as an essential prerequisite for any activity. The Code explicitly refers to the context of negotiations with all suppliers and is a founding element of the requirement that enables commercial relations with the entire FiberCop supply chain, including at the level of subcontracting. The code also focuses on respect for Human Rights, calling for "treating everyone, without exception, with respect and dignity, guaranteeing equal treatment and opportunities" and "avoiding and combating any form of discrimination, exploitation or abuse";

- the "Purchasing Products and Services" procedure is the document that dictates the rules for the correct management of all procurement processes, including sustainability aspects. It details all the provisions regarding the protection of social guarantees, which must be transferred to suppliers and subcontractors in the specific phases of engagement (qualification, tenders, negotiations). It also provides for the establishment of checks on the actual implementation of the commitments undertaken by the contracting parties, and sanctions the application of appropriate corrective measures, where non-compliance is ascertained. The highest management level responsible for implementing the policy is the head of FiberCop's Purchasing department;

- the "FiberCop Supplier Registry and Qualification" procedure is the document that requires suppliers to adhere to the ethical-behavioural principles that FiberCop has set out in its Code of Ethics with particular reference to the activity of guaranteeing freedom of association of workers and recognizing the right to collective bargaining; ensure that you do not employ forced and compulsory labour; refrain from employing child labour. Finally, it should be remembered that in terms of safety aspects, the activities are carried out in strict compliance with the terms provided for by Italian legislation, which imposes the obligation to disclose risks not only to its own people, but also to contractors, which have the burden of disseminating it to their workers. The recipients of the procedure are the suppliers of FiberCop's supply chain, to whom different screening methods are applied based on criteria mostly related to the economic entity of the purchases for which they are selected.
- the Supplier Code of Conduct, drawn up in

2025, was communicated to suppliers during the Facciamo Rete event, and included in the contractual clauses. This is FiberCop's first ESG positioning document in a role as supply chain leader and a tool for transferring from FiberCop to suppliers the ethical and ESG principles outlined in its institutional documents and its environmental targets that inevitably involve the supply chain to achieve the SBTi Scope 3 objectives and Net Zero by 2050. Procurement is responsible for communicating the Supplier Code of Conduct, while Sustainability is responsible for updating and implementing it in ESG targets. The actions and supervision of Health and Safety issues are the responsibility of the department of the same name. The three departments operate in coordination in the Corporate Chief Officer area. Human Resources intervenes on issues related to people, Human Rights and issues of equality and gender equality also referred to in the Code.

The following table illustrates FiberCop's oversight of S2 issues and the integration between corporate documentation, commitments and involvement of corporate departments.



FIBERCOP'S CAMPAIGNS AND ACTIONS ON ESRS S2 ISSUES

ESRS S2 Requirement	Required content	FiberCop Controls / Actions	Evidence	Responsible Department
S2-1 Policies	Policies towards workers in the value chain (rights, non-discrimination, inclusion).	Minimum standards for suppliers/ subcontractors; membership to UN/ILO/ CSRD/CSDDD; Responsible AI; extension to subcontractors.	Supplier Code of Conduct / Code of Ethics / Human Rights Policy	Procurement, within Chief Corporate Officer
S2-2 Processes – Due diligence	Processes for managing impacts and risks in the supply chain; dissemination of the Code of Ethics and the Code of Conduct for Suppliers; compliance with laws.	Due diligence on subcontracting; audits and controls; Procurement/Sustainability responsibility.	Supplier Code of Conduct / Code of Ethics / Human Rights Policy	Procurement and Health, Safety and Environment and Sustainability in the Chief Corporate Officer area (governance process)
S2-2 Processes – Health and Safety	H&S systems: ISO 45001, training, PPE, risk assessment, health surveillance, emergencies.	H&S along the supply chain with minimum requirements and preventive/continuous training.	Supplier Code of Conduct / Code of Ethics	Health, Safety and Environment in the Chief Corporate Officer area; Technology & Operations
S2-2 Processes – Reports	Whistleblowing channels for the supply chain, secure and confidential.	Reporting portal, protection of whistleblowers, similar tools required of suppliers.	Supplier Code of Conduct / Code of Ethics	Compliance; Sustainability within Chief Corporate Officer
S2-3 Commitments	Commitments to improve working conditions and mitigate impacts.	Prevention culture; dialogue with suppliers; training and skills; collaborative approach.	Supplier Code of Conduct / Human Rights Policy	Sustainability within Chief Corporate Officer
S2-4 Actions – Rights and Conditions	Actions to eliminate illegal practices and ensure fair conditions.	Prohibitions on minor/forced labour; freedom of association; equal pay; Harassment prevention.	Supplier Code of Conduct / Code of Ethics / Human Rights Policy	Compliance; Procurement, within Chief Corporate Officer
S2-4 Actions – Health and Safety	Technical/organisational actions of prevention and protection.	Risks at source; collective protection; innovative solutions; emergencies; surveillance.	Supplier Code of Conduct / Risk Assessment Document - DVR	Health, Safety and Environment in the Chief Corporate Officer area; Technology & Operations
S2-4 Actions – Integrity and Ethics	Integrity, anti-corruption, traceability, privacy, IP.	ISO 37001; conflicts of interest; traceability; GDPR; books/registers.	Code of Ethics / Supplier Code of Conduct	Compliance; Sustainability within Chief Corporate Officer
S2-4 Actions – Environment & Climate	Environmental safeguards along the supply chain and contribution to climate targets.	ISO 14001; resources/recycling; protection of ecosystems; reporting; supplier decarbonization; Net-Zero.	Environmental Policy / Supplier Code of Conduct	Technology & Operations (Energy/Environment); Sustainability for the governance of decarbonization goals
S2-5 Targets	Qualitative/quantitative targets on rights, H&S, climate.	UN/ILO/CSRD compliance; ISO 45001; gender equality; 2029 decarbonization plans; Net-Zero 2050.	Human Rights Policy / Environmental Policy / Supplier Code of Conduct	Technology & Operations (Energy/Environment); Chief Corporate Officer: Procurement for process governance and Sustainability for the governance of decarbonisation objectives; Health, Safety and Environment for oversight of ISO 45001 certification; Chief Human Resources Officer for oversight of UNI PdR/ 125 issues

S2-2 Processes for engaging with value chain workers about impacts

22a The companies in the value chain are periodically involved and made aware of specific issues, with particular attention to the issue of injuries; FiberCop Supplier Code of Conduct (described in S2-1, 16) require suppliers to adopt the principles contained therein by applying them to their workers and contexts; the transfer of these principles to their supply chain is also required.

22b More specifically, the involvement of workers in the value chain takes place indirectly through different methods. Annually, FiberCop organizes an engagement event with the supply chain: the 2025 event called Together Let's Connect the Future, was attended by over 200 suppliers. The suppliers involved are the reference companies also by virtue of consolidated relationships with FiberCop. On the occasion of the event, the participants (Company heads and managerial figures in Sustainability and HSE) were involved in identifying the impacts for the topics of competence. The Building Network program was presented, which summarises all the initiatives aimed by FiberCop at companies in the value chain, involved and raised awareness through the program's activities on specific issues.

22c From an operational point of view, all activities related to the Insieme Connettiamo Futuro event are the responsibility of the Procurement department to which the Sustainability department provides support for ESG issues. The main network companies are regularly involved in specific ESG issues directly by the Sustainability department. On Health and Safety issues, FiberCop and the HSE managers of the main network companies are constantly discussed in order to share best practices and refine actions and processes.

The activities envisaged under the Building Network programme are mainly:

- ESG mapping of the supply chain by assigning each supplier an ESG profile;
- customized improvement plans with possible involvement of tier 2 suppliers;
- introduction of partnership agreements available to the supply chain (e.g. Agreement with Simest – ANIE SIT);
- benefits for suppliers' workers with the extension of internal agreements to supply chain partners;



- assignment of a score with respect to the results obtained by the supplier, useful for FiberCop for a correct assessment of its supply chain (Vendor Rating).

In addition, the inspection and verification activities on construction sites, carried out by FiberCop's lines of business directly or as a customer, represent a further mechanism of indirect involvement: through inspections, controls and corrective actions, FiberCop monitors operating conditions and contributes to the reduction of risks for the workers of contractors.

22d In light of the recent establishment of the current FiberCop, the Company has not signed global framework agreements or other agreements with global trade union federations relating to respect for the Human Rights of workers in the value chain. As already mentioned, most of the network companies are based in Italy, with almost total coverage of workers with CCNL.

22e,23 Since 2025 represents the first year of structured supply chain involvement and coincides with the first full exercise of FiberCop's current

structure, a formalized mechanism that allows the effectiveness of the involvement of workers in the value chain to be systematically tracked and evaluated is not yet operational.

S2-3

Processes to remediate negative impacts and channels for value chain workers to raise concerns

27a As part of the supplier selection and qualification processes, ESG impact assessments are being integrated as a structural element of risk monitoring along the value chain. Through dedicated questionnaires and the collection of documentary evidence, the Company assesses the ESG maturity of the partners and gives specific weight to environmental, social, ethical and governance aspects, proportionate to the criticality of the product category. This approach, which will be fully operational during 2026, makes it possible to identify potential negative impacts and promptly activate corrective measures, while constituting

an indirect channel through which workers in the supply chain can bring out significant critical issues through the reports collected in the ESG due diligence process.

27b,c,d Currently, FiberCop does not yet have channels specifically dedicated to workers in the value chain that allow them to report concerns or needs and receive support.

In 2025, the first full year of operation of the current corporate structure, the Company has nevertheless started a process of strengthening governance controls on the supply chain, which provides for the progressive development of structured tools for listening to and managing reports, as part of the Building Network program and ESG due diligence processes.

Through the whistleblowing channel, workers in the value chain can submit reports relating to non-compliance with Company's principles.

The signaling channel is described in G1-1 and is a tool that also extends to the FiberCop value chain. It is also communicated to suppliers through the Code of Ethics and the Supplier Code of Conduct.

S2-4
Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions

30,31 The initiatives described below detail how FiberCop in the medium, short, and long term concretely pursues the principles and provisions contained in the policies and procedures described above to contain the impacts and risks identified in the double materiality analysis. For details on the allocated financial resources, please refer to Section S1-14.
32a FiberCop has adopted an Occupational Health and Safety Management System (OHSMS) compliant

with ISO 45001. The certification has been extended during 2025 to all business processes. Integrated along the supply chain, it allows to protect both internal and external workers, reduce operational risks, increase transparency and consolidate the culture of prevention. The approach is based on principles of prevention, participation and continuous improvement, supported by a set of organisational and documentary safeguards that ensure the suitability, adequacy and effectiveness of the system. These include:

- periodic reviews by the Management on OSH issues;
- assessment of risks and opportunities, with continuous methodological updating;
- monitoring of injuries;
- near-miss, non-conformities and related corrective actions.

For 2026, for the purpose of maintaining the certification itself, an audit program has been set up throughout the Country, which includes 24 audits on personnel/processes within the Company and 24 audits on contractors and subcontractors carried out by qualified internal lead auditors and ISO 45001 auditors in order to verify the application of safety regulations on plants in progress.

The checks will be carried out using checklists created in order to ensure uniformity of conduct and completeness in risk assessment, monitoring of non-conformities, field checks of safety procedures, reporting to management and comparison with the RLS.

The results feed into the management reviews, closing the PDCA cycle¹⁴ also in the relationship with suppliers.

14 Plan-Do-Check-Act

32b In order to reduce the risks associated with implementation activities, FiberCop, through its technical and territorial control departments, has introduced, in addition to controls, specific actions aimed at maintaining high awareness of internal and external workers such as use of specific questionnaires (check lists) that workers must fill in in order to perform some activities at greater risk:

- climbing to height: work activity that exposes the worker to the risk of falling from a height of more than 2 meters with respect to a stable surface;
- access to confined spaces: access to places with limited openings for entry and exit, unfavorable natural ventilation and not designed for the continuous presence of workers;
- work on category 0 electrical systems (in places with a risk of explosion).

32a Among the activities of the Procurement department, a standard qualification process is in place which provides, limited to certain product categories sensitive to ESG issues, an additional but binding assessment for admission to the supplier register, as previously mentioned.

FiberCop includes clauses in contracts with suppliers regarding the compliance of the treatment of workers with the elementary principles of Human Rights (e.g. the express prohibition of the use of child

labour). Finally, when launching tenders, FiberCop requires the presence of classification, remuneration and worker time requirements that favor an ongoing and fair relationship. On the subject of the health and safety of external workers, it is committed to selecting companies and suppliers that meet precise criteria and possess certifications that attest to them (i.e. ISO 45001, ISO 9001 and ISO 14001). Specific system procedures are also implemented and checks are carried out on the external workforce. The results of the checks are discussed during the review, with the participation of the Workers' Safety Representative. It should be noted that the experimentation of the artificial intelligence process for safe climbing to height has been extended to external workers.

32c As part of the operations related to network works contracted out to external suppliers, the competent technical guidelines carry out constant and periodic control activities on compliance with health, safety and environmental obligations. The controls are implemented through the application of manuals consisting of dedicated verification modules that assess the prevalence of the obligations provided for by the specific regulations. On the basis of the results of the checks, the vendor rating index is processed for network work and for other strategic and risky sectors and penalties are applied. The surveys carried out are instructed through the monitoring of return and improvement actions. More generally, from the

point of view of control management, a program of sample checks on compliance with contractual provisions is being studied, both with regard to new suppliers and suppliers already included in the register. Performance indicators are defined on the basis of the priority of the actions necessary to ensure safety and regulatory compliance.

32d The effectiveness of FiberCop's actions along the supply chain is monitored through comparison and sharing activities with suppliers. The Building Network program, launched in the second half of the year, will synthesise all the initiatives for companies in the value chain that are involved and sensitised on specific issues, obtaining feedback and feedback. The activities envisaged under the programme are:

- ESG mapping of the supply chain by assigning each supplier an ESG profile;
- customized improvement plans with possible involvement of tier 2 suppliers;
- introduction of partnership agreements available to the supply chain (e.g. Simest, ANIE SIT and FiberCop Agreement);
- benefits for suppliers' workers with the extension of internal agreements to supply chain partners;
- assignment of a score with respect to the results obtained by the supplier, useful for FiberCop for a correct assessment of its supply chain (the aforementioned vendor rating index).

FiberCop is equipping itself with digital tools to promote supplier engagement on sustainability issues and to measure their performance.

With reference to tenders and the tools provided to support ESG assessment (sustainability envelope), FiberCop has strengthened the issue of gender equality in the tender requirements, which constitutes an additional reward, thus achieving the provisions of the New Procurement Code (art. 108 paragraph 7 of Legislative Decree 36/2023) in line with the introduction of gender equality certification (art.46 bis Legislative Decree 198/2006 as amended by Law 12/2021 and Gender equality practices Reference UNI PdR 125).

Finally, in terms of health and safety, the most significant impacts can be specifically identified in the areas of activity intrinsically characterized by the greatest probability of injuries (in particular network work and construction sites).

Potential negative impacts have been identified, related to occupational health and safety aspects with related legal and reputational risks associated with the occurrence of any non-compliance in the implementation of prevention plans. The monitoring of Company's processes and their evolutions is constant in close connection with the organisational structures, especially with regard to health and

safety aspects. Work activities are classified on low and medium risk levels, in line with the ATECO classification criteria of the National Institute of Statistics.

In FiberCop there are no activities classified as high risk.

36 In 2025, no cases of non-compliance with Human Rights principles were detected in the upstream chain.

32a The Real Estate department of FiberCop entrusts the design, construction management and safety management on construction sites to contracted external professionals, separately from the construction phase entrusted to the executing company.

The professional, depending on the type of intervention, draws up the Single Document for the Assessment of Risks from Interference (DUVRI) or the Safety and Coordination Plan (PSC) and carries out the necessary contacts with the Local Health Authorities for the appropriate communications. The budget dedicated to this type of assignment varies according to the activities planned.

33a The processes for identifying actions are defined in consideration of any non-compliance with specific contractual clauses, non-compliance that may lead to the termination of the contract, provided for by law even in the event of serious non-

compliance by the supplier.

This process allows FiberCop to be more effective in directing its related industries to punctual adherence to ethical principles and respect for Human Rights.

33b The Procurement department analyses the request for breach of duty received, making use of the support of the Legal department for the management of legal and contractual aspects and, for compliance issues only, of the Compliance department. In the event of ascertained non-compliance by the supplier, the Category Managers, regardless of the contract amount, request authorisation from the Procurement Manager to proceed with the preparation of the documentation relating to the termination of the contract.

34 As a mitigation action with respect to the risk of dependence on the supply chain - which emerged as a material risk in the IRO analysis - FiberCop has strengthened its industrial collaboration model through the signing of the Simest-ANIE SIT-FiberCop agreement. The agreement, which involves the main companies in the supply chain, aims to support the resilience of the national supply chain, facilitate access to financial instruments dedicated to technological transformation, promote the adoption of shared ESG standards and ensure greater stability

in production capacities. This intervention makes it possible to reduce the company's exposure to potential supply disruptions, increase the supply chain's ability to respond to peaks in demand and strengthen the oversight of sustainability issues through common guidelines and a structured dialogue between FiberCop and strategic partners.

38 FiberCop assigns dedicated and structured resources to the management of significant impacts relating to workers in the value chain, ensuring continuous, integrated and documentable monitoring. Primary responsibility is attributed to the Sustainability department which coordinates ESG governance, supervises impact analysis processes and collaborates with operational departments and supply chain companies. The HSE department, responsible for monitoring health and safety risks along the supply chain, and the Procurement department, which oversees the application of ESG requirements in the qualification, audit and monitoring processes of suppliers, also contribute to the day-to-day management of impacts.

Impact management includes

- internal specialist figures (Sustainability,

Procurement, HSE, Legal, Compliance) dedicated to risk management, verification of requirements and supervision of engagement processes;

- digital tools for the collection, standardisation and validation of ESG data from suppliers;
- formalised internal control processes, such as thematic audits, approval workflows, certifications from department heads and periodic monitoring of risk indicators;
- structured involvement mechanisms that include surveys, focus groups, periodic meetings with network companies, joint training sessions, listening and consultation moments;
- dedicated strategic initiatives, including the Simest-ANIE-FiberCop agreement, aimed at strengthening the resilience of the supply chain, supporting investments by companies in the supply chain, promoting the stability of production flows and ensuring operational capacities adequate to industrial needs, thus mitigating the risk of dependence on the supply chain.

Through these resources - organisational, technical, financial and collaborative - FiberCop ensures systemic and transparent management of significant impacts in the value chain, ensuring that users of the report have a clear understanding of the ways in which the Company oversees risks and promotes improvements along the supply chain.

S2-5

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

With reference to the commitments described in paragraph S2-1, FiberCop has defined objectives aimed at improving the approach to sustainability issues within the supply chain.

The Supplier Code of Conduct extends ESG objectives to suppliers, highlighting their involvement and clarifying that FiberCop's main objective is to align suppliers with ESG best practices as well.

The objectives set out below have been defined to assess the degree of supplier engagement and alignment with the Company's positioning on environmental and ethical issues.

In terms of performance monitoring, a roadmap has been set that will lead to the screening of the entire supply chain in the coming years. It should also be noted that some information flows have already been agreed with suppliers, especially with regard to the monitoring of the number of injuries of the main contractors (Network Companies). In 2025, data on injuries is available: 104 injuries were recorded, with no serious injuries and no fatalities. The Company aims to perfect this process in the future, also through the digitization of information acquisition systems. The objectives that impact the value chain are illustrated in the graphic.

The two objectives shown in the table represent actions aimed at engaging the supply chain on environmental and ethical governance issues. The two targets serve as shared measurement metrics, jointly monitored by the Sustainability and Procurement departments. FiberCop has communicated, through its institutional channels, the policies that guide these objectives to its stakeholders.

The objectives relating to the reduction of Scope 3 emissions, described in E1, which FiberCop pursues by driving the supply chain towards Net-Zero will also have a positive impact on business models with consequent transformations in the direction of greater sensitivity to all ESG issues.

42a,b,c Through recurring meetings of the Procurement and HSE departments, engagement

events, as well as through the activities of the Building Network program, FiberCop listens to the needs of the people who work every day in the companies in its chain. Dialogue and information collected as well as monitored over time, are translated, guided and progressively perfected actions and objectives with concrete involvement of the supply chain with a view to mutual and continuous improvement.

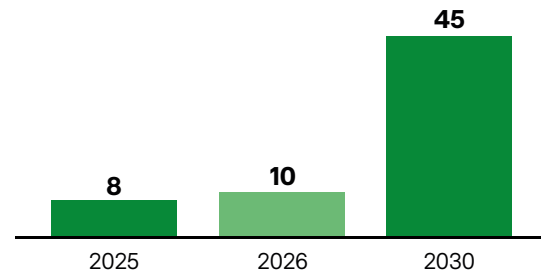
ESG PLAN '26-'30: OBJECTIVES THAT IMPACT THE VALUE CHAIN



CLIMATE

Engagement on SBTi targets

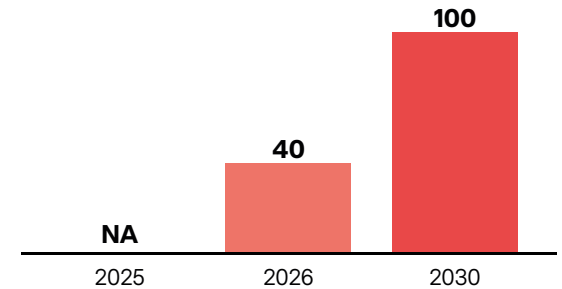
Values in %



ETHICS

Signing of the Supplier Code of Conduct

Values in %



Affected Communities

ESRS S3



ESRS 2 SMB-3

Material impacts, risks and opportunities and their interaction with the strategy and business model

9 FiberCop interacts directly with the local communities involved in the development and management of network infrastructures. The communities directly involved include the Municipalities, Provinces and Regions in whose territories the Company's activities are carried out, as well as the territorial associations of Confindustria, as they represent the local production fabric and are relevant interlocutors in the planning and implementation processes of infrastructural interventions. In relation to the territories in which the Company operates, there are no indigenous peoples within the meaning of the definitions and international standards of reference.

9d These subjects are mainly involved in relation to the authorization aspects, the management of impacts on the territory and the enhancement of the economic and social benefits related to the dissemination of digital infrastructures. Indirectly,

FiberCop's activities also affect other communities, including citizens and workers in the supply chain, through effects related to improving access to connectivity, the economic development of territories, safety and operational conditions on construction sites and employment opportunities generated along the supply chain. In this sense, the creation and evolution of network infrastructures contribute to influencing the quality of life of communities and the performance of local economic systems.

9b The deployment of digital infrastructures affects communities in several ways. Considering the extension of the activities throughout the Country, these impacts take on a widespread dimension and affect a plurality of territorial, urban and extra-urban contexts, characterized by different local needs and specificities.

FiberCop adopts a development model that integrates technological innovation and sustainability, with the aim of creating lasting value for the territory.

The Company applies a structured method to analyse the effects of these transformations, assessing their impact on the environment and people, with the

aim of balancing business needs with those of the territory.

In particular, as illustrated in the section "General Information - Impacts, risks and relevant opportunities and their interaction with the strategy and business model", the potential inconveniences deriving from infrastructure works, the difficulties that some vulnerable categories could encounter in the transition to fiber and the risks related to the security and maintenance of the networks were considered, by taking measures to mitigate

their impacts and foster sustainable and inclusive implementation.

9c In the context of the development and deployment of network infrastructures, local communities, economic operators and public administrations benefit significantly from the interventions carried out by FiberCop. In particular, the availability of advanced digital infrastructure fosters the improvement of connectivity and digital inclusion of territories, helping to reduce the technological divide and expand access to digital services for citizens and businesses.

These benefits are accompanied by specific attention to sustainability aspects, which translates not only into the adoption of low-impact construction techniques and the reuse of existing infrastructure, but also on the effects of the technological evolution of the networks.

The latter allows for a progressive optimisation of infrastructural assets and the consequent availability of spaces that can also be destined, in collaboration with strategic and institutional partners, to alternative uses, such as the creation of university residences, the development of housing for families and low-middle income workers, senior housing, promoting sustainable living and urban redevelopment processes and generating new opportunities for enhancement for the communities and for the local economy.

10 In this context, the roadshow "*FiberCop for the development of territories*", carried out under the patronage of Associazione Nazionale Comuni Italiani (ANCI), is part of an initiative to discuss with Local Administrations the issues of digital infrastructure development, digital transition and public-private collaboration for the reduction of the digital divide. In line with this collaborative approach, FiberCop has also signed an agreement with the Unione Province Italiane (UPI) aimed at promoting a more efficient and attentive construction of network infrastructures to the needs of the territories, through the dissemination of innovative and low-impact excavation techniques, which allow rapid, safe and minimally invasive interventions. The agreement strengthens dialogue with the Provinces, promotes the sharing of technical expertise, facilitates authorisation processes and encourages the reuse of existing infrastructure.

S3-1
Policies related to affected communities

14-18 FiberCop adopts a targeted approach aimed at protecting and involving all the communities concerned through constant active listening and dialogue with Local Administrations and territorial associations, ensuring transparency on



interventions and promoting sustainable practices such as low-impact excavation techniques and the reuse of existing infrastructure.

The Company has not yet adopted specific policies on affected communities, but through the Code of Ethics social responsibility, fairness and impartiality are recalled and timely reports of any violations of Human Rights are provided. In addition, the Code of Ethics dedicates an entire section to respect for Human Rights, with particular attention to vulnerable groups and the protection of the territory and local communities, and includes specific commitments on environmental sustainability. Finally, in line with the Code of Ethics and Model

231, the institutional document "Commitment to Environmental Sustainability of FiberCop" reiterates that the protection of communities is an integral part of the Company's approach to sustainability, and that FiberCop recognizes the environment as a primary asset and is committed to reducing impacts, preventing pollution and operating according to precaution, prevention, protection and continuous improvement, generating value for stakeholders and communities.

Policy communication is managed through:

- meetings with Local Administrations and territorial stakeholders;
- publication of press releases and updates on

the main initiatives and Company's policies in the "News" section of the official FiberCop website;

- organisation of public meetings and territorial roadshows to present Company's policies, listen to the needs of communities and collect feedback;
- activation of dedicated digital channels (toll-free numbers and certified e-mail address) to provide information, receive reports and respond to requests from communities;
- participation in working groups with trade associations, local authorities and stakeholders, to share Company's guidelines and promote continuous dialogue.



FIBERCop ROADSHOW

The "FiberCop roadshow for the development of territories" represents a strategic initiative dedicated to the digital transition and the sustainable development of local infrastructures.

The initiative, under the patronage of ANCI, was designed to support municipalities in the adoption of best practices for the efficient and low-impact laying of fiber optics, encouraging the spread of more advanced and sustainable solutions for the construction of networks.



Particular attention is paid to small-section excavation techniques, such as micro-trenching.

As part of FiberCop's continuous commitment in the area, the roadshow was divided into five stages, with a launch event at national level, held at the beginning of December in Rome, at the prestigious headquarters of the Association, and which saw the participation of the ANCI National Secretary, Dr. Veronica Nicotra, and four appointments at the local level, covering the entire national territory (Naples, Turin, Bologna and Livorno).

During the various stages, the same format was used, which included, after the initial greetings by the ANCI Representatives, a focus on the role of FiberCop as an enabler of innovation, which was followed by the technical presentation on the micro-trench. The work ended with the interventions of some municipalities that testified to their experiences with the aim of sharing practices, benefits and results useful to the community and replicable in other contexts.

The project responds to the following objectives

- **Promote dialogue and discussion with Local Administrations in the construction of resilient digital infrastructures and advanced services for more connected cities and communities.**
- **Transforming connectivity into concrete opportunities for citizens, businesses and local communities** through dedicated resilient technologies and infrastructure models, contributing to the sustainable development of territories.
- **Enhancing public-private collaboration** to reduce the digital divide, an essential element to activate effective synergies with private partners in order to overcome digital inequalities and guarantee equal opportunities for access to connectivity.
- **Share** sustainable, innovative and low environmental impact technical solutions (small-section excavation techniques e.g. micro-trench).

S3-2 Processes for engaging with affected communities about impacts

21 FiberCop actively involves all the communities concerned and their representatives through a plurality of tools and channels, as already represented in ESRS 2 SBM-3.

The Local Public Affairs department, formalised in the Company's Organisational Communications, is responsible for defining and representing the Company's position towards Local Institutions and Bodies, the management and coordination of association relations with local Confindustria and local Associations. In this sense, it guarantees constant dialogue with these interlocutors by encouraging the promotion of sustainable practices, adoption of protocols with local authorities, as also documented by the constant reporting to the Supervisory Body.

S3-3 Processes to remediate negative impacts and channels for affected communities to raise concerns

27 As regards the processes to remedy the negative impacts on the communities concerned, please refer to section S3-5.

28 FiberCop has set up dedicated channels to allow communities to express concerns, report critical issues and propose suggestions. These tools are monitored and managed in a transparent and timely manner and communicated through institutional channels, initiatives, road shows in the area:

- Reporting portal (whistleblowing and criticality): FiberCop Reporting Portal;
- FiberCopspa@pec.FiberCop.it address on the official website Legal Notice - FiberCop;
- For reporting hazards on poles, cables, and FiberCop infrastructures or reporting damage to third parties Contacts - FiberCop;
- For requests to move poles, cables and other infrastructures FiberCop Contacts - FiberCop;
- Institutional channels: meetings, working tables, public events.

Full anonymity is guaranteed to whistleblowers.

S3-4 Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions

31 In relation to the significant impacts on the communities concerned related to the technological evolution of the networks and the operational activities in the area, FiberCop has adopted a set of measures aimed at preventing or mitigating potential negative effects and ensuring the continuity of essential services for the population. With reference to the migration process from legacy technologies to fiber optic solutions, the Company has implemented technological solutions aimed at reducing potential indirect inconvenience to the detriment of telecommunications operators' customers, with particular attention to the categories most exposed to adaptation difficulties.

These solutions make it possible to maintain the use of telecommunications services in a transparent and seamless manner, limiting the need for contractual or operational changes for customers and helping to preserve accessibility to basic services.

The planned investments are already included in section E1 which describes the transition actions resulting from decommissioning operations. With regard to the temporary impacts on the territory deriving from the excavation and installation of network infrastructures, FiberCop adopts low-impact operational techniques aimed at reducing inconvenience for citizens, in particular in terms of urban mobility, noise and occupation of public land.

The use of the microtrenching technique makes it possible to contain the duration and extension of construction sites, improve safety levels and accelerate the restoration of the areas concerned, favoring a rapid return of spaces to the community.

The effectiveness of these actions is supported by the integration of technological and operational solutions designed to reduce the overall impact of the activities on the territory and by the constant dialogue with Local Administrations and other stakeholders involved, in order to adapt the interventions to the specificities of the local contexts and to promptly intercept any critical issues.

**S3-5
Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities**

The objectives related to the management of significant impacts on the communities concerned are not defined as autonomous targets but are integrated into the plans for the decommissioning of legacy technologies and the deployment of the fiber optic network, which represent the Company's main industrial planning tools. These targets are

therefore based on metrics, processes, progress and effectiveness' monitoring, and the involvement of stakeholders in strategic guidelines. In terms of managing significant impacts on the communities concerned, the industrial targets allow:

- to ensure the continuity and accessibility of services during the technological transition, minimising potential negative effects on end-users;
- to reduce the temporary impact of construction site activities on the territories, through the adoption of low-impact techniques and operational solutions oriented towards speed of execution and restoration;
- to promote the widespread diffusion of high-capacity connectivity on a national scale, contributing to economic development and territorial cohesion;
- to promote an efficient and rational use of existing infrastructures, including through the reuse and optimization of assets.

The monitoring of the achievement of these objectives takes place as part of the ordinary processes of planning, progress and control of infrastructure plans, through operational milestones and progress indicators consistent with the industrial strategy and with the needs of the territories concerned.





Entity Specific

Cybersecurity e Information Security

ES1-5

Material impacts, risks and opportunities and their interaction with the strategy and business model

FiberCop's activities depend substantially on the reliability of the network and the information systems that support its operation. Any cyber-attacks may compromise the continuity and quality of the services provided to network operators, affect the integrity and confidentiality of the data processed and generate significant impacts on the reputation of the Company, recognized as operator of critical national infrastructures. Such events could result in economic losses for the Company, as well as penalties arising from non-compliance with applicable regulations.

In this context, the security of digital infrastructures is a central element of the Company's strategy and an essential prerequisite for the creation of long-term value. The Company has therefore adopted a structured and continuous approach to risk management, based on integrated organizational

and technological measures and on an operating model that guarantees constant monitoring of critical assets¹.

The analysis conducted made it possible to identify the main risks related to Cybersecurity and Information Security, also in relation to the obligations provided for by the Golden Power (GP), National Cyber Security Perimeter (PSNC) and NIS2 Directive (Network and Information Security second edition), such as:

- risks of regulatory non-compliance, with possible penalties and reputational impacts. To mitigate these risks, continuous monitoring by the relevant departments is necessary, so as to ensure timely compliance with the obligations towards the competent institutions;
- cyber and national security risks, related to the management of critical assets that could be the subject of cyber incidents, with potential effects on business continuity and the resilience of the national infrastructure;
- reputational risks, deriving from any security breaches or non-compliance in mandatory



communications to the Presidency of the Council of Ministers (PCM) and the National Cybersecurity Agency (ACN), which could compromise the trust of stakeholders and operators served.

¹ Critical asset: a digitally classified resource essential to business operations.

NON-COMPLIANCE RISKS

Risk	u.m.	Possible effects on the financial position	Description
GP Regulatory non-compliance risks	Million euro	39	Minimum amount. A penalty of up to twice the value of the transaction is envisaged and in any case not less than 1% of turnover (estimate on 2024 revenues).
PSNC Regulatory non-compliance risks	Million euro	1.8	Worst case, as provided for in paragraphs of Article 1 of Decree-law no. 105/2019 (National Cyber Security Perimeter), converted with amendments by Law no. 133/2019.
NIS2 Regulatory non-compliance risks	Million euro	10	Worst case, as provided for by the NIS2 regulation. Potential ancillary sanctions: temporary suspension of the authorization to provide services/activities; inability to perform managerial departments for board members.

At the same time, the integrated management of security aspects also generates important opportunities:

- strengthening FiberCop's governance, through the definition of procedures that identify roles, responsibilities and oversight in the various regulatory areas;
- deriving from a structured operating model, which allows continuous control over critical assets and infrastructures, improving the effectiveness of supervisory activities and the ability to respond to incidents;
- linked to cross-departmental coordination, which promotes the quality, timeliness and consistency of the information transmitted to the competent authorities, improving the efficiency of internal processes and regulatory compliance.

The integration of these aspects into the corporate model, together with the adoption of a dedicated cyber insurance policy, which further strengthens the overall risk-management strategy, helps enhance the organization's overall resilience and reinforces FiberCop's role as a reliable and responsible operator in managing communication infrastructures that are strategic for the Country.

ES1-2 Cybersecurity and Information Security Policies

From 2024, following the Prime Ministerial Decree (DPCM) of 16 January 2024 on GP and with the aim of mitigating the risks identified in the areas of Cybersecurity and Information Security, FiberCop

adopted the National Cybersecurity Guidelines, developed by the Security Organization, with the objective of fully implementing national regulations on cyber protection. The Guidelines strengthen security governance by defining roles and responsibilities for the three regulatory perimeters of reference (GP, PSNC and NIS2) and ensuring the continuous monitoring of critical assets. Their implementation is entrusted to the Chief Security Officer, who also holds the role of Security Officer, while the Chief Information Technology Officer performs the departments of Contact Point for the NIS2 regulation.

FiberCop guarantees compliance with the requirements of the competent authorities (PCM, ACN) and ensures the sending of mandatory communications, including reports, notifications and inventories of relevant assets. The protection of information assets is a pillar of corporate responsibility and of the Governance, Compliance and Risk Management system; for that purpose, the Information Security Policy defines strategic objectives, roles, requirements and security measures, applying to all assets, processes, people and technologies, including suppliers and partners. FiberCop is committed to ensuring confidentiality, integrity and availability of information, continuity of services, protection of personal data, structured incident management, collaboration with national institutions, as well as continuous training and awareness of personnel.

The Policy, together with the Cybersecurity Guidelines, is subject to a formal updating and approval process and is made available on the Intranet and specific internal communications. Its implementation is entrusted to the Chief Security Officer.

ES1-4
Cybersecurity and Information Security targets

The management of Cyber risk on ICT assets is based on international standards with particular reference to NIST - Cyber Security Framework V2 and ISO/IEC 27001.

This management takes into account the current regulations applicable to FiberCop such as GP, PSNC and NIS2 Directive, ensuring that the security measures meet the requirements for the technological assets in Scope of the process itself. Finally, the Cyber risk management process on ICT assets was certified in 2025 according to the ISO 27001 standard. The ICT Risk Planning and Assessment department aims to maintain certification in the year 2026.

Considering the global context of cybersecurity, characterized by recurring threats, security events and intrusion attempts are regularly encountered, all effectively identified and contained by the protection systems adopted.

In 2025, no breaches were recorded with impacts on the availability, integrity or confidentiality of data. The definition of the objectives associated with Cybersecurity and Information Security complies with the requirements of the regulations (national and European), the achievement of which has been defined within FiberCop.

Currently, the management of the obligations required by sectoral regulations, as well as the preparation of information reports to the relevant bodies, is the main objective of the department.

In particular, the following objectives are defined for the year 2026:

NON COMPLIANCE RISKS

Targets	Description
Fulfilment of the obligations provided for by the GP legislation	Preparation of compliance reports and prior information in compliance with the deadlines indicated by the Prime Ministerial Decree of 16 January 2024.
Fulfilment of obligations under the PSNC	Transmission to the ACN of the updated list of ICT Assets and procurement communications, in compliance with the deadlines indicated by the regulations.
Fulfilment of NIS2 obligations	Annual update of information due from NIS2 subjects and implementation of basic specifications.
Fulfilment of cross-cutting obligations under significant cybersecurity incident notification regulations	Communication of relevant cyber events to the competent authorities, in compliance with the established methods and timing, ensuring the traceability, completeness and consistency of the information transmitted.

ES1-3
Cybersecurity and Information Security actions

During the year, FiberCop continued to strengthen security safeguards to protect critical assets and ICT systems, in line with the relevant national legislation. The Security Organization has carried out continuous control and supervision activities on all business processes and departments involved in the management of assets relevant to defense and national security and strategic for the communications sector, in compliance with the provisions of the Prime Ministerial Decree of 16 January 2024.

In this context, FiberCop's Security Organization has also guaranteed compliance with the communication obligations provided for by the GP regime, ensuring the preparation and transmission to the competent institutions of the six-monthly compliance reports and preventive information required by law. During 2025, all mandatory communications were sent in compliance with the established timelines.

Regarding the obligations relating to the PSNC, FiberCop has prepared and transmitted to the ACN, within the established timeframe, the mandatory documentation, including:

- the list of ICT assets pursuant to Legislative Decree 105/2019;
- the communications of procurement of ICT Goods provided for by Presidential Decree 54/2021;
- certification of the adoption of Category A Safety Measures.

The process for the communication and management of IT security incidents provided for by Prime Ministerial Decree 81/2021 has also been launched, thus strengthening the ability to respond to relevant cyber events. At the same time, FiberCop has fulfilled the obligations provided for by the

NIS2 regulatory framework, registering on the NIS Services Portal managed by ACN and proceeding with the annual update of the information due by the subjects falling within the Scope of Legislative Decree 138/2024.

Finally, in 2025, the ICT Risk Planning and Assessment department ensured constant monitoring of cyber risks on existing ICT assets and those related to new business initiatives, such as fixed access, IP backbone and cloud migration programs.

Risk management took into account the main applicable national and international regulations, including GP, PSNC and NIS2, contributing to an overall strengthening of the organization's security position.

The ICT Risk Planning and Assessment department has a budget dedicated to financing cyber risk management activities on ICT assets.

As regards the amount of resources, coverage of approximately 1 million euros was guaranteed in 2025; an economic commitment of a similar magnitude is also expected for 2026. Finally, it should be noted that for the budgets indicated above, financial instruments that can be classified as sustainable have not been adopted for the moment.



Business Continuity

ES2-5

Material impacts, risks and opportunities and their interaction with the strategy and business model

Business Continuity represents an essential factor for the Company in overseeing and mitigating the risks inherently connected to its role as an enabler of the Country's digital innovation. As an infrastructure manager, ensuring the operational continuity of the network means ensuring the uninterrupted provision of wholesale services to telecommunications operators and, indirectly, supporting the essential activities of businesses, public administrations and citizens, thus contributing to the digital resilience of the Country system.

Infrastructure resilience is ensured through the Network Operation Center (NOC), which operates 24/7, with real-time monitoring systems, backup power supplies, disaster recovery plans, and geographic redundancy protocols. All critical incidents are analyzed, and regular drills are carried out to test and update recovery plans. A Crisis Committee has also been established to support the management of significant events; it defines strategies for handling



critical situations in order to ensure a prompt and effective response to emergencies. Furthermore, the ICT Risk Management and Business Continuity processes are designed to identify risk components and define preventive measures to mitigate them, as well as response actions in the event of a critical incident, with the aim of ensuring timely reaction and limiting impacts. During 2025, FiberCop obtained ISO 22301 certification, the purpose of which is to

define the requirements for a Business Continuity Management System (BCMS), allowing it to prevent, prepare, respond to and recover from unexpected interruptions, ensuring the continuity of critical processes, business resilience and the safeguarding of reputation and stakeholders while maintaining a high level of quality of the network and services offered. The certification concerns, among others, the processes of Delivery, Assurance, Maintenance.

FiberCop carries out several projects aimed at strengthening the resilience of the network infrastructure, improving operational efficiency and supporting access to advanced digital services for all operators and their customers, ensuring continuity of service during the phases of technological evolution. In 2025, the project to decommission the exchanges based on copper technology was launched, with the gradual migration of customers to the fiber optic network. The migration takes place without impacting the activities of operators and their customers thanks to the adoption of technological solutions that guarantee continuity of legacy services.

FiberCop is building a new national transport network designed to accompany the decommissioning of old copper infrastructure and ensure a modern, reliable and high-performance network. The new architecture is based on very high capacity optical backbones that connect the main nodes of the network, ensuring high speeds, continuity of service and the ability to manage the growing volumes of data traffic. As a wholesale-only operator, FiberCop makes this infrastructure available to all retail operators in a neutral way, contributing to the development of a competitive digital ecosystem. By joining the PNRR Italia 1 Giga call, FiberCop contributes to the goal of bringing connectivity at least 1 Gbit/s in

download and 200 Mbit/s in upload to all real estate units that today do not have a network capable of delivering at least 300 Mbit/s in download. The FiberCop quota provides for the connection of about 1.3 million of civic buildings. By 2025, about 1 million houses have been connected, in 2026 the plan is expected to be completed.

ES2-2 Business Continuity Policies

To ensure the continuity of its activities and protect stakeholders, FiberCop has adopted the BCMS which ensures compliance with current regulations and regulatory requirements. The system allows business processes to be kept operational even in the event of unforeseen events, through organisational and operational measures consistent with the international standards of reference.

The model is supported by a dedicated structure that coordinates activities, updates procedures and ensures that the necessary measures are taken. The BCMS is based on a continuous approach that includes:

- identification of critical processes and assessment of potential impacts in the event of an outage;

- analysis of risks and key vulnerabilities, including systems, locations, suppliers and staff continuity;
- integration of results to define and update the Business Continuity Plan;
- definition of response actions, including communication methods and interventions useful for restoring activities in different risk scenarios;
- periodic tests, which make it possible to verify the effectiveness of the measures and identify opportunities for improvement;
- constant monitoring of events, to update the model and ensure continuous improvement.

As already mentioned, FiberCop's Business Continuity system is certified according to the ISO 22301 standard, which confirms the adequacy of the approach adopted and its alignment with international best practices.

The governance of BCMS, consisting of the Business Continuity function, promotes, through awareness programs, training and the dissemination of the culture of Business Continuity and specific methods of managing operational discontinuities to keep the BCMS effective. The main operational departments are the subject of in-depth Business Continuity analyses, whose processes, if interrupted, can have a significant impact on the Company's business.



ES2-4

Business Continuity targets

80 FiberCop has defined a specific objective to ensure the operational continuity of its NGAN² network, an essential element to ensure the availability of the service and the resilience of the digital infrastructure. The objective aims to maintain high levels of network reliability and rapid recovery times in the event of failures, ensuring continuity of the services offered to operators and, indirectly, to end users. The importance of the objective is linked to the Company's ability to reduce operational risks, ensure the continuity of an essential infrastructure for the community and strengthen the resilience of the communications system. The Scope of the objective covers the entire NGAN network, with a focus on the critical components necessary to ensure service continuity. Progress is monitored through two key indicators:

- overall network availability, which measures the ability of the infrastructure to remain operational without significant disruption;
- the percentage of faults resolved within 24 hours, an indicator of the timeliness of intervention and the effectiveness of the maintenance model.

The Policy, and the BCMS as a whole, makes it possible to guarantee the provisions of current regulations (e.g. NIS2, PSNC) in the field of Business Continuity.

The organisational document that formalises the BCMS is verified by the main corporate departments, approved by the head of the Cyber Risk Management & Business Continuity department who works in the Chief Security Officer area and

made available for consultation on the Intranet to ensure its dissemination to the entire Company population. In order to make the Business Continuity Policy available to all interested stakeholders, which has already been published on the Company Intranet, activities have been launched to allow it to be published on the website.

FiberCop has also set up the Crisis Management Committee to which reference is made in ESRS 2.

² Next Generation Access Network, comprising OLT (Optical Line Terminal) and ONU-C (Optical Network Unit).

The objective is consistent with European and national policies aimed at strengthening the resilience of digital networks and ensuring the continuity of essential services. Monitoring is continuous and is based on network supervision systems, analysis of recovery times and periodic performance checks, so as to ensure constant alignment with the objective and promptly identify any areas for improvement.

The objective is composed of two targets described in the table below.

As part of the objectives, FiberCop has set a measurable goal: the maintenance of ISO 22301 certification in 2026. The level of the objective is absolute (whether or not certification is maintained). The certification attests to the compliance of the Business Continuity Management System with international standards and is issued by a third party following annual audits and renewal scheduled at the end of the three-year cycle. Maintaining the certification allows the Company to offer additional guarantees to stakeholders, consolidating confidence in the ability to ensure continuity of

services even in critical situations. The objective involves the main business processes related to Business Continuity.

During the three-year period of validity of the certification, any updates in processes or methodologies are managed with a view to ensuring consistency and comparability of results. The combination of these actions allows FiberCop to transparently monitor its performance, assess the trend with respect to the objectives set and contribute to a sustainable and resilient management of the network infrastructure.

BUSINESS CONTINUITY OF NGAN NETWORK

KPI Description	Calculation method	Units of Measurement	Detected value	Target value
NGAN network availability: Measuring the network's ability to remain operational and reachable on an ongoing basis, limiting the impact on essential services and departments of public interest.	<p>The indicator is calculated as the ratio of:</p> <ul style="list-style-type: none"> numerator: the total duration, expressed in seconds, of all alarms triggered during the reference period on the ONU-C³ and OLT6 systems; denominator: the product of the duration of the reference period (expressed in seconds) and the number of active systems during that period. <p>Calculated with monthly average for 2025</p>	%	99.87	99.60
Percentage of faults resolved within 24 hours on the NGAN network Assessment of the share of faults restored within 24 calendar hours in the 08:00–20:00 time slot, as a measure of maintenance effectiveness and operational readiness.	<p>Percentage of "on-site" interventions resolved within 24 calendar hours, calculated in the time slot from 08:00 to 20:00</p> <p>Calculated as a weekly average for 2025</p>	%	91.59	87.00

³ ONU-C: (Optical Network Unit Cabinet), OLT (Optical Line Terminal).

ES2-3
Actions related to Business Continuity

68 In 2025, following the achievement of ISO 22301 certification, FiberCop started the necessary activities to ensure its maintenance in 2026 as well.

The main commitment concerned the updating and alignment of the Business Continuity documentation with the requirements of the certified perimeter, with particular attention to the processes considered strategic for business operations. During the year, the Business Impact Analysis and Business Continuity

Plans were reviewed, including the execution of the tests planned to verify their effectiveness. The completion of the adaptation of the entire perimeter of the processes is scheduled by 2026, thus ensuring a constant evolution of the business continuity system.

Since the certification includes annual audits, in 2025 FiberCop also monitored and implemented the main improvement actions during the audits, ensuring the progressive strengthening of its Business Continuity management model and full compliance with international standards.





Attachments

Appendix B

List of datapoints in cross-cutting and topical standards that derive from other EU legislation

This appendix is an integral part of the ESRS 2. The table below illustrates the datapoints in ESRS 2 and topical ESRS that derive from other EU legislation.

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material datapoint	If yes, location in sustainability statement
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II		YES	Section ESRS2 GOV-1
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		YES	Section ESRS2 GOV-1
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10, Table #3 of Annex 1				YES	Section ESRS2 GOV-4
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II		NO	
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicators number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		NO	
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicators number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		NO	
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		NO	
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	YES	Section E1-1

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material datapoint	If yes, location in sustainability statement
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12.1(d) to (g), and Article 12.2		YES	Section E1-1
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicators number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		YES	Section E1-4
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1				YES	Section E1-5
ESRS E1-5 Energy consumption and mix paragraph 37	Indicators number 5 Table #1 of Annex 1				YES	Section E1-5
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicators number 6 Table #1 of Annex 1				YES	Section E1-5
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		YES	Section E1-6
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		YES	Section E1-6
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	YES	Section E1-7
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		NO	

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material datapoint	If yes, location in sustainability statement
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.			NO	
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy- efficiency classes paragraph 67 (c)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking book -Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral			NO	
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		NO	
ESRS E2-4 Amount of each pollutant listed in Annex II of the EPRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1				NO	
ESRS E3-1 Water and marine resources paragraph 9	Indicators number 7 Table #2 of Annex 1				NO	
ESRS E3-1 Dedicated policy paragraph 13	Indicators number 8 Table #2 of Annex 1				NO	
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicators number 12 Table #2 of Annex 1				NO	
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicators number 6.2 Table #2 of Annex 1				NO	

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material datapoint	If yes, location in sustainability statement
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	Indicators number 6.1 Table #2 of Annex 1				NO	
ESRS 2- IRO 1 - E4 paragraph 16 (a) i	Indicators number 7 Table #1 of Annex 1				NO	
ESRS 2- IRO 1 - E4 paragraph 16 (b)	Indicators number 10 Table #2 of Annex 1				NO	
ESRS 2- IRO 1 - E4 paragraph 16 (c)	Indicators number 14 Table #2 of Annex 1				NO	
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Indicators number 11 Table #2 of Annex 1				NO	
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicators number 12 Table #2 of Annex 1				NO	
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicators number 15 Table #2 of Annex 1				NO	
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicators number 13 Table #2 of Annex 1				YES	Section E5-5
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicators number 9 Table #1 of Annex 1				YES	Section E5-5
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Indicators number 13 Table #3 of Annex 1				NO	

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material datapoint	If yes, location in sustainability statement
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	Indicators number 12 Table #3 of Annex 1				NO	
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				YES	Section S1-1
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		YES	Section S1-1
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Indicators number 11 Table #3 of Annex 1				NO	
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	Indicators number 1 Table #3 of Annex 1				YES	Section S1-1
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	Indicators number 5 Table #3 of Annex 1				YES	Section S1-3
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Indicators number 2 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		YES	Section S1-14
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicators number 3 Table #3 of Annex 1				YES	Section S1-14
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicators number 12 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		YES	Section S1-16
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicators number 8 Table #3 of Annex 1				YES	Section S1-16

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material datapoint	If yes, location in sustainability statement
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicators number 7 Table #3 of Annex 1				YES	Section S1-17
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		YES	Section S1-17
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicators number 12 and n. 13 Table #3 of Annex I				YES	Section S2 SBM-3
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex I				YES	Section S2-1
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicators number 11 and n. 4 Table #3 of Annex I				YES	Section S2-1
ESRS S2- 1 Non respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicators number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		YES	Section S2-1
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		YES	Section S2-1
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicators number 14 Table #3 of Annex 1				YES	Section S2-4
ESRS S3-1 Human rights policy commitments paragraph 16	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex I				YES	Section S3-1

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material datapoint	If yes, location in sustainability statement
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Indicators number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		NO	
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicators number 14 Table #3 of Annex 1				NO	
ESRS S4-1 Policies related to consumers and end- users paragraph 16	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex I				NO	
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicators number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		NO	
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicators number 14 Table #3 of Annex 1				NO	
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicators number 15 Table #3 of Annex 1				YES	Section G1-1
ESRS G1-1 Protection of whistle - blowers paragraph 10 (d)	Indicators number 6 Table #3 of Annex 1				YES	Section G1-1
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	Indicators number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II)		YES	Section G1-4
ESRS G1-4 Standards of anti - corruption and anti - bribery paragraph 24 (b)	Indicators number 16 Table #3 of Annex 1				YES	Section G1-4

Additional disclosure

The information provided in this section offers an additional view compared to what has been reported and prepared in accordance with the ESRS Standards, in order to further detail the impacts, risks, and opportunities identified through the Double Materiality analysis.

CERTIFICATIONS

ESG Area	Certification	Scope	Coverage	Validity	Certification Body	Accreditation Body
E	ISO 14001 : 2015	Environmental Management System	100% of sites (136 key sites audited)	23 Feb 2025 – 23 Feb 2028	SGS	Accredia
	ISO 50001 : 2018	Energy Management System	100% of most energy-relevant sites (9 sites), with expansion to 12 sites in 2026 and a mid-term plan to extend to all national backbone PoPs	14 Nov 2025 – 12 Jul 2028	RINA	Accredia
S	ISO 45001 : 2018	Occupational Health & Safety Management System	25% of sites (150 staffed sites certified); progressive extension to 100% staffed sites in 2026 and full site coverage by 2027	28 Nov 2024 – 9 Dec 2027	RINA	Accredia
	ISO 30415 : 2021	Human Resources Management – Diversity & Inclusion	100% of staffed sites	21 Nov 2025 – 21 Nov 2028	RINA	Accredia
	UNI/PdR 125 : 2022	Gender Equality	100% of sites	30 Oct 2024 – 17 Sep 2026	RINA	Accredia
G	ISO 9001 : 2015	Quality Management System	100% of sites (136 key sites audited)	22 Oct 2024 – 25 Jun 2027	SGS	Accredia
	ISO 27001 : 2022	Information Security Management System	100% of sites (2 key sites where Security function is located)	20 Nov 2025 – 19 Nov 2028	RINA	Accredia
	ISO 22301 : 2019	Business Continuity Management System	100% of critical business processes (26 processes across 13 sites)	10 Nov 2025 – 4 May 2027	RINA	Accredia
	ISO 37001 : 2016	Anti-Bribery Management System	100% of sites (all company locations)	10 Oct 2025 – 13 Oct 2028	RINA	Accredia

WATER

Withdrawal source	Water withdrawn (m ³)
Groundwater	7,998
Third-party water	765,042
Total amount of water withdrawn	773,040

Note: Given the nature of FiberCop's activities, water is used exclusively for civil purposes (e.g., office facilities), as the company does not operate industrial or manufacturing processes. The company does not withdraw water from areas classified as water-stressed according to the Water Risk Atlas.

WORKFORCE

Indicator	Women	Men	Total
FTEs			18,047.6
Part-Time employees	669	80	749
Full time employees	3,585	13,942	17,527
Top Managers (C-level)	1	11	12
Executive Managers (net of CEO and C-level)	37	95	132
Middle Managers & Professionals	338	863	1,201
Employees (net of TOF – Field Technicians)	3,652	7,954	11,606
TOF – Field Technicians	226	5,099	5,325
New Hires	66	132	198
Absenteeism rate			6.7%

PRIVACY

	Indicator	Value
Complaints	Substantiated complaints received from outside parties concerning breaches of customer privacy or losses of customer data	0
	Substantiated complaints from regulatory bodies concerning breaches of customer privacy or losses of customer data	0
Breaches	Incidents of identified leaks of customer data	0
	Incidents of theft of customer data	0
	Incidents of loss of customer data	0
	Requests received from the Italian Data Protection Authority (Garante Privacy) concerning customer privacy complaints or cases	0

GENDER PAY GAP

	Indicator	Value
Gender Pay Gap	Workforce (net of CEO and C-level)	-1.1%
	Executives (net of CEO and C-level)	-1.9%
	Middle Managers & Professionals	-2.8%
	Employees (incl. TOF – Field Technicians)	-2.9%
Average Wages	Average Base Salary (RAL) reported for all female employees (net of CEO e C-level)	€ 36,819
	Average Base Salary (RAL) reported for all male employees (net of CEO e C-level)	€ 37,226
	Average Base Salary (RAL) reported for workforce (net of CEO and C-level)	€ 37,131

Methodological note: The gender pay gap has been calculated using the following formula: (average Gross Annual Salary of female employees ÷ average Gross Annual Salary of male employees) - 1. For the purpose of this calculation, Gross Annual Salary refers to the total fixed annual remuneration before taxes and social contributions, corresponding to the Italian concept of Retribuzione Annuale Lorda (RAL).

Note: The Company is committed to continuously monitoring the gender pay gap with the objective of maintaining it within a narrow range (±3%), in line with leading international best practices, thereby ensuring pay equity across the organization.

WHISTLEBLOWING COMPLAINTS

Category of reporting (FC Portal)	Description (FC Portal)	Category (ESG-aligned)	Nature of Allegations (Summary)	No. of Reports	Substantiated (Founded & Partially founded)	Corrective Actions Implemented
Security	Violations related to physical access security, ICT risk management, business continuity and cybersecurity	Security & Cybersecurity	Access controls	4	3	Process updates, IT controls enhancement
			Cybersecurity violations	0	0	
Health and Safety	Reports of violations concerning workers' health and safety	Health & Safety	Workplace safety procedures, PPE compliance, contractor safety	9	3	Policy reinforcement, additional H&S training
Discrimination, harassment, and issues related to the employment relationship	Any form of physical, verbal, or digital abuse (harassment) and discrimination in the workplace, including inappropriate relationships between supervisors and subordinates, such as favoritism, bullying, mobbing, defamation, and threats	Workplace Conduct & Harassment (incl. discrimination & labor relations)	Misuse of corporate assets, conflicts of interest, secondary employment outside designated hours and/or agile frameworks, disrespectful behavior toward colleagues, missing clock-ins	59	11	Disciplinary actions, mediation, awareness training
			Alleged harassment, gender-based discriminations, human rights	0	0	
Antitrust & regulation	Antitrust violations: anti-competitive practices, such as cartels or abuses of a dominant position	Antitrust & Regulatory Compliance	Potential competition law breaches, regulatory non-compliance	1	0	Legal review, compliance reinforcement
Administration/Accounting	Reports related to administrative and accounting violations (incl. taxation & finance)	Financial & Accounting Integrity	Accounting irregularities, expense claims, internal controls	6	0	Control strengthening, audit follow-up
Personal data protection	Reports of privacy-related violations (e.g. practices compromising the confidentiality of personal data)	Data Protection	Personal data handling, GDPR concerns	0	0	Process updates, IT controls enhancement
Climate Change	Complaints for violation of Legislative Decree 125/2024 (implementing Directive (EU) 2464/2022) concerning, among other things, illegal behaviors that contribute to worsening climate change and the communication of untrue information on the subject	Climate & Environmental Matters	Environmental compliance, emissions reporting concerns	0	0	Process clarification, ESG data validation
Other	Reports of violations and/or behaviors that do not comply with company procedures and regulations and are not included in the previous cases	Other Ethical Concerns	Conflict of interest, Code of Ethics breaches	11	0	Internal review, reminder of Code of Ethics obligations
TOTAL				90	17	

Training & Development 2025 KEY TRAINING METRICS

Metric	Value	Notes
Total training hours	776,493	Mandatory + Voluntary
Mandatory training hours	148,852	HSE (114,186h) + Business Ethics & Compliance (9,125h) + Cybersecurity Awareness (20,644h) + Privacy (4,897h)
Voluntary training hours	627,641	All other training incl. training on the job, excl. mandatory
Employees who received training	19,139	Unique individuals
Average headcount (year)	18,571	Reference base for % of employees trained
Year-end total employees	18,276	Reference headcount at 31/12/2025
% of employees receiving training	103%	19,139 / 18,571 avg headcount
Avg. training hours per employee	42	776,493 h ÷ 18,571 avg headcount

Training & Development 2025 OTHER TRAINING DISCLOSURE DATA POINTS

Indicator / Data Point	Value / Status	Notes
Training hours - Women	183,690h (4,388 employees)	Average 41.9 h/person
Training hours - Men	592,803h (14,751 employees)	Average 40.2 h/person
Training hours - Executives	2,988h (157 employees)	Average 19.0 h/person
Training hours - Middle Management	47,176h (1,238 employees)	Average 38.1 h/person
Training hours - Non-managerial Employees	726,330h (17,744 employees)	Average 40.9 h/person
Coverage of training metrics	Full-time and part-time permanent employees	Contractors and temporary workers excluded
Certifications & degree programs	42 courses 547 participants 33,292h	Technical certifications + School of Growth
Mandatory cluster definition	HSE + Business Ethics & Compliance + Cybersecurity & Privacy	Includes all legally required training under applicable Italian regulations
Voluntary cluster definition	All other training incl. training on the job	Excludes mandatory cluster as defined above

Training & Development 2025
TRAINING HOURS BY CLUSTER & TOPIC

Cluster	Topic	Hours	% of Total Hours	Participants	% Completion
Mandatory	Health, Safety & Environment	114,186	14.7%	13,785	92%
	Cybersecurity	20,644	2.7%	15,086	In progress (2025–26)
	Privacy	4,897	0.6%	14,086	99%
	Business Ethics & Compliance: Anti-corruption	2,831	0.4%	16,648	100%
	Business Ethics & Compliance: Ethics / Code of Conduct	2,367	0.3%	13,922	100%
	Business Ethics & Compliance: Whistleblowing	1,688	0.2%	16,434	100%
	Business Ethics & Compliance: Conflict of Interest	2,177	0.3%	4,732	100%
	Business Ethics & Compliance: D.Lgs. 231	62	0.0%	57	95%
Voluntary	ICT	347,835	44.8%	14,667	
	Business Management	131,622	17.0%	17,362	
	Social	66,383	8.5%	18,244	
	Power Skills	28,054	3.6%	15,103	
	School of Growth	19,674	2.5%	94	
	Certifications	13,618	1.8%	306	
	Language Training	8,654	1.1%	2,443	
	Health, Safety & Environment	7,672	1.0%	4,446	
	LinkedIn Learning	1,390	0.2%	500	
	Coaching	1,361	0.2%	163	
	Onboarding	1,147	0.1%	249	
	Security	231	0.0%	240	



EY S.p.A.
Via Giuseppe Giacosa, 38
10125 Torino
Tel: +39 011 5161611
Fax: +39 011 5612554
ey.com

Independent auditor's report on the limited assurance of the Sustainability Statement (Translation from the original Italian text)

To the Board of Directors
FiberCop S.p.A.

We have been appointed to perform a limited assurance engagement on the Sustainability Statement prepared on a voluntary basis of FiberCop S.p.A. (hereinafter "the Company") for the year ended on 31 December 2025.

Responsibility of the Directors and Board of Statutory Auditors for the Sustainability Statement

The Directors of FiberCop S.p.A. are responsible for the development and implementation of procedures used to identify the information included in the Sustainability Statement in accordance with the requirements of the "European Sustainability Reporting Standards" issued by the European Commission ("ESRS") and for the description of such procedures in the paragraph "General basis for preparation of sustainability statements" of the Sustainability Statement.

The Directors are also responsible for that part of internal control that they consider necessary in order to allow the preparation of the Sustainability Statement free from material misstatements caused by fraud or not-intentional behaviors or events.

The Directors are also responsible for defining FiberCop S.p.A.' objectives with respect to sustainability performances, as well as for identifying the stakeholders and the material aspects to be reported.

Independence of the Audit firm and quality management

We are independent in accordance with the ethics and independence requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code) issued by the International Ethics Standards Board for Accountants, which is based on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior.

Our audit firm applies the International Standard on Quality Management (ISQM Italia 1), under which it is required to design, implement and operate a system of quality management that includes policies or procedures on compliance with ethical requirements, professional standards, and applicable legal and regulatory provisions.

EY S.p.A.
Sede Legale: Via Meravigli, 12 - 20123 Milano
Sede Secondaria: Via Lombardia, 31 - 00187 Roma
Capitale Sociale Euro 3.000.000 i.v.
Iscritta alla S.O. del Registro delle Imprese presso la CCIAA di Milano Monza Brianza Lodi
Codice fiscale e numero di iscrizione 00434000584 - numero R.E.A. di Milano 609158 - P.IVA 00891231003
Iscritta al Registro Revisori Legali al n. 70945 Pubblicato sulla G.U. Suppl. 13 - IV Serie Speciale del 17/2/1999

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Auditor's responsibility

It is our responsibility to come, based on the procedures performed, to a conclusion on the compliance of the Sustainability Statement with the reporting criteria set out in the ESRS. Our work was carried out in accordance with the criteria indicated in the "International Standard on Assurance Engagements ISAE 3000 (Revised) – Assurance Engagements Other than Audits or Reviews of Historical Financial Information" (hereinafter also "ISAE 3000 Revised"), issued by the International Auditing and Assurance Standards Board (IAASB) for limited assurance engagements. This standard requires the planning and performance of procedures to obtain limited assurance that the Sustainability Statement does not contain material misstatements.

Therefore, our engagement involved a level of work that was less extensive than that required for a reasonable assurance engagement conducted in accordance with ISAE 3000 Revised, and consequently does not enable us to obtain assurance that we would become aware of all significant facts and circumstances that might be identified during such an engagement.

The procedures performed on the Sustainability Statement were based on our professional judgment and included interviews, primarily with the Company's personnel responsible for preparing the information presented in the Sustainability Statement, as well as document analyses, recalculations, and other procedures aimed at obtaining evidence deemed useful.

In particular, we performed the following procedures:

1. understanding the process for assessing the materiality of the information included in the Sustainability Statement by analyzing the approach adopted by the Company for identifying and assessing the relevant impacts, risks and opportunities relating to sustainability matters, and verifying the related disclosures reported in the Sustainability Statement;
2. comparing the economic and financial data and information included in the Sustainability Statement with the data and information contained in the Company's financial statements;
3. understanding the processes underlying the generation, recording and management of the significant qualitative and quantitative information included in the Sustainability Statement.

In particular, we conducted interviews and discussions with the personnel of FiberCop S.p.A.'s Management and performed limited document verification in order to gather information on the processes and procedures supporting the collection, aggregation, processing and transmission of qualitative and quantitative data to the function responsible for preparing the Sustainability Statement.

Furthermore, for significant information, considering the Company's activities and characteristics:

- a) with regard to the qualitative information included in the Sustainability Statement, we conducted interviews and performed document verification, on a sample basis, to assess their consistency with the available evidence;
- b) with regard to the quantitative information, we performed analytical procedures and, where deemed necessary, limited verification, on a sample basis, on the aggregation of data and on the criteria and calculation methodologies applied.

Conclusions

Based on the procedures performed, nothing has come to our attention that causes us to believe that the Sustainability Statement of FiberCop S.p.A. for the year ended on 31 December 2025 has not been prepared, in all material respects, in accordance with the reporting criteria set out in the ESRS, as identified by the Directors in the section "General basis for preparation of sustainability statements" of the Sustainability Statement.

Other matters

This report is not issued pursuant to any legal requirement, as the Company is not obliged to prepare a sustainability statement.

Turin, 8 April 2026

EY S.p.A.
Signed by: Ettore Abate, Auditor

This report has been translated into the English language solely for the convenience of international readers.

