

TESSELLIS

# Sustainability Report 2023



# Sustainability Report 2023

**Consolidated  
Non-Financial Statement  
pursuant to  
Legislative Decree  
no. 254/2016a**

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7 May 2024

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## Letter to Stakeholders

Dear All,

2023 was a year of consolidation for the Tessellis Group, following the completion of the merger between Linkem Retail and Tiscali S.p.A. in 2022.

The five pillars of our seventh social report – **governance, technological innovation, customers, people, and environmental impact** – remain consistent with the founding values of our Group. However, they are also marked by new developments and a continuous drive towards the future. I would like to briefly highlight the most significant points in each area.

### Governance

In June 2023, Tiscali Italia participated in the consultation initiated by MIMIT aimed at acquiring the market's perspective on the application of the new Electronic Communications Code, in line with the objectives of the Digital Single Market Strategy in Europe.

In September 2023, the so-called Whistleblowing Procedure was approved, ensuring that employees and external parties have the opportunity to report potential irregularities or violations concerning legal standards, rules, and company procedures, such as the Organizational Model 231, the Code of Ethics, and/or one or more company procedures of the Tessellis Group.

Finally, always with a view to ensuring conditions of fairness and transparency in business conduct and company activities, we implemented a new supplier evaluation process in the last quarter of 2023, based on reliability criteria, including sustainability.

### Technological Innovation

During 2023, Tessellis further focused on developing the mobile and Ultrabroadband market, with coverage across the national territory steadily expanding. Activities related to the strategic partnership between Tiscali Italia S.p.A. and FibreConnect S.p.A. continued, aimed at developing the ultra-broadband market in selected industrial and artisanal areas. This partnership involves Tiscali Italia's commercial participation in the creation of FTTH infrastructure, enabling us to offer a high-performance, highly reliable, and available service that allows local businesses to partake in the fourth industrial revolution.

The Group also reaffirmed its commitment to innovation, achieving a significant milestone we are particularly proud of. With its Villanova Project, Tiscali was selected by the European Commission to develop Multimodal Generative AI services as part of the Important Project of Common European Interest (IPCEI), aimed at promoting a "European cloud ecosystem" for businesses and the public sector. The goal is to implement an ecosystem for data processing, management, and utilization in a scalable and efficient manner, democratizing access to advanced artificial intelligence technologies: a major challenge and a growth opportunity for us and the entire country.

## Clients

In 2023, we placed emphasis on service quality control activities, as well as on the growth and consolidation of Customer Satisfaction, which we consider a priority for building a solid relationship with our customers. To more effectively achieve this goal, working teams were created in operational management to support operators and team leaders.

In September, we adhered to the “Code of Conduct for Call Center Activities” approved by the Communications Authority. This Code addresses the need for broader dissemination of principles to protect consumers in the realm of telemarketing and teleselling. Although Tiscali Italia does not currently engage in such activities, we deemed it essential to subscribe to this code, sharing its spirit, in line with our longstanding commitment to collaboration with the Authorities and our tradition of transparency.

## People

Starting from the premise that we consider our people a valuable asset of skills, experiences, and attitudes to be enhanced and empowered, in 2023, we continued our commitment made following the 2022 merger between Linkem and Tiscali: optimizing and managing labor costs in a way that is non-disruptive to employment levels, well-being, and motivation of our people.

To meet this challenge, we used 3 strategies:

- a new managerial model
- a new performance management system whose objectives include promoting a homogeneous corporate culture, guiding individual behaviour, and fostering a culture of listening and feedback;
- the systematic use of internal job posting to manage almost all the company’s organisational needs.

We also paid great attention to corporate welfare, with initiatives aimed at ensuring a work environment that protects health, psycho-physical well-being, and work-life balance. Among these, I would like to mention the activation of an online psychological support service through the specialized platform Mindwork, offering 8 free sessions per year to all employees who request it, and the “Run Forever” initiative, which promotes running as a simple and accessible sport for everyone through training plans, informative and motivational snippets.

The main achievement, however, was signing a comprehensive agreement in July with the national Secretariats Slc-CGIL, Fistel-CISL, Uilcom-UIL, which revised and enriched the existing corporate welfare package. This includes measures that will be in effect until the end of 2026, such as paid leave for school integration, hourly parental leave, paid leave not included in contractual calculations for personal needs, temporary part-time and unpaid leave for personal needs, welfare credits for the purchase of goods and services through a dedicated platform, and structured smart working with the possibility to work remotely two days a week or cumulatively within the month of reference.



## The environmental impact

Over the past year, Tessellis has undertaken multiple activities aimed at shaping and substantiating our contribution to increasingly pronounced environmental sustainability. I would like to highlight two of them.

The first is the expansion of Tiscali's corporate forest. Continuing a path started in 2021, in June 2023, Tiscali Italia and SIDI (Swiss Institute for Disruptive Innovation) strengthened their joint commitment by planting 20,000 trees, in addition to those already planted in the past. Today, our corporate forest boasts 45,000 trees of various mangrove species, chosen for the reforestation of Madagascar. It is one of the largest corporate forests in Europe and contributes to the reduction of 1,350 tons of CO2 per year, while also providing fair job opportunities for local populations.

The second initiative is a collaboration with Agrenta S.r.l., a startup engaged in industrial research and development in the fields of agricultural sciences and food technologies, to implement projects that support Agriculture 4.0. This partnership aims to promote the digital transition of agricultural enterprises through the implementation of sustainable agri-food systems enabled by Tiscali's "Linkem4Farm" technologies.

In the following pages, you will have the opportunity to delve into all the elements of our social report.

Happy reading.

The Chief Administrative Officer  
Davide Rota



## Methodological Note

As a public interest entity (within the meaning of Article 16, paragraph 1, of Legislative Decree no. 39 of January 27, 2010), Tessellis S.p.A. (hereinafter also referred to as “Tessellis”) falls within the scope of Legislative Decree no. 254/2016, which implements Directive no. 2014/95/EU on non-financial reporting. Therefore, in order to comply with the obligations as set out in Articles no. 3 and 4 of the aforementioned Decree, Tessellis must prepare a Consolidated Non-Financial Statement, which describes the initiatives and main results in terms of sustainability performance achieved during the 2023 financial year. This document represents the second Consolidated Non-Financial Statement (hereinafter also referred to as “NFS”) of the Tessellis Group (hereinafter also referred to as “Tessellis” or the “Group”).

It should be noted that, following the relevance analysis of the topics provided for by Article no. 3 of Legislative Decree no. 254/2016 and considering the specific characteristics of the business, issues concerning human rights, water consumption, and atmospheric pollutant emissions, excluding greenhouse gas emissions, were not deemed relevant for ensuring an understanding of the Group’s activities, performance, results, and the impact they produce; therefore, they are not addressed in this document.

As required by Article no. 5 of Legislative Decree no. 254/16, this document constitutes a separate report, marked with an appropriate notation, to associate it with the Consolidated Non-Financial Statement as provided by the regulation. The 2023 NFS has been prepared in accordance with the “GRI Sustainability Reporting Standards” (2021) published by the Global Reporting Initiative (GRI). An appendix to the document includes the table of reported GRI indicators. The reporting content has been kept consistent with the aspects identified during the materiality analysis conducted in 2022, through which Tessellis identified material aspects for both the Group and its stakeholders. Tessellis considers the NFS a fundamental tool for dialogue with its stakeholders, to disseminate its CSR activities, and to open a discussion with them.

The economic data and financial information in the NFS refer to all the companies controlled and consolidated on a full consolidation basis in the Group’s Consolidated Financial Statements as of 31 December 2023 (in particular, the data related to the sections “Directly generated and distributed economic value” and “EU Taxonomy of sustainable economic activities”).

The scope of the information regarding the social and environmental data of the 2023 NFS includes Tiscali Italia S.p.A. (hereinafter also referred to as “Tiscali”) and the subsidiary 3P Italia S.p.A. (hereinafter also referred to as “3P”) and refers to the entire reporting period (1 January 2023 – 31 December 2023). The companies Vevisible S.r.l. and Linkem Services S.r.l., included with reference to social data, are excluded from the scope of environmental data as their impact is not deemed significant.

The Group has undergone substantial changes in its internal structure, starting with the incorporation of the business unit of Linkem Retail S.r.l. and 3P Italia S.p.A. into Tiscali Italia S.p.A. (hereinafter also referred to as the “Merger”) completed on 1 August 2022. With a subsequent operation on 26 September 2022, the participation in 3P Italia S.p.A. was consolidated through the acquisition of a controlling interest. On 27 October 2022, Vevisible S.r.l., the Group’s advertising concessionaire held 75% by Tiscali Italia S.p.A., was established.

In October 2023, Tessellis acquired a majority stake in Aetherna S.r.l., is a company specializing in the provision of digital services in the hospitality sector and is 60% owned by Tiscali Italia S.p.A. However, Aetherna S.r.l. is not included within the scope of the social and environmental information of the 2023 NFS; this limitation is not considered significant for understanding Tessellis Group’s business activities, performance, results, and impact.

To ensure accurate representation of performance and data reliability, the use of estimates has been minimized where possible and appropriately indicated when present. Restatements of data published in the previous 2022 NFS are also clearly indicated in this document.

It should be noted that the Tessellis Group will be required to apply the new Corporate Sustainability Reporting Directive (CSRD) from the financial year beginning 1 January 2024. Tessellis has initiated a mapping of the informational requirements provided by the CSRD and the European Sustainability Reporting Standards (ESRS) to identify the information that the Group will need to integrate for the 2024 financial year and to develop an action plan to ensure compliance with the new regulations.

This Consolidated Non-Financial Statement was presented and approved by the Board of Directors of Tessellis on 7 May 2024. The document has undergone a compliance assessment (“limited assurance engagement” according to the criteria outlined by the International Standard on Assurance Engagements ISAE 3000 Revised) by the designated auditor, Deloitte & Touche S.p.A. The verification was conducted according to the procedures indicated in the “Independent Auditor’s Report” appended to the document.

The publication frequency of the Consolidated Non-Financial Statement is annual. The current Consolidated Non-Financial Statement is available on the Company’s website at [www.tessellis.it](http://www.tessellis.it), in the Documents – Financial Statements and Reports section. Paper copies are available at the Company and can be requested via email at the following address: [ir@tiscali.com](mailto:ir@tiscali.com) (Investor Relations).

# 1. Tessellis Group: profile, mission and values

The Tessellis Group is a **Digital Company** with one of the largest fiber coverages available in Italy. The Group's largest operating company is Tiscali Italia S.p.A., a national operator that ranks among the top in the UltraBroadband segment, utilizing the most innovative and promising technologies: FWA 5G (Fixed Wireless Access) and FTTH (Fiber To The Home).

The Group's main areas of activity are:

- **Telco:** fixed services – in Ultrabroadband fixed and fixed wireless mode – and mobile services, to private and business customers,
- **Media&Tech:** media activities through the portal [www.tessellis.it](http://www.tessellis.it) and sale of space through the concessionaire Vevisible,
- **Innovative services for B2B and Public Administration:** vertical platforms and services – smart city services for households, businesses and public administrations.

For Tessellis, value creation is a practice that involves the entire supply chain: from caring for people, who are an integral part of the Group's history, to supporting local communities, building trust with our customers, fostering a passion for innovation, and committing to society in the broadest sense of the term.

## 1.1 Mission and values

Tessellis' mission is to provide everyone with equal and free access to digital life. With over twenty years of experience as Internet pioneers and first movers, we aim to continue being key players in the digital revolution, fostering an ecosystem of projects, ideas, and businesses that support the growth of individuals and enterprises.

These are our values:

- **INNOVATION:** We believe that technology can and should be a positive force, and that innovation contributes to improving people's lives. We view change as an opportunity for growth and are committed to creating value through industrial synergies. We operate with a long-term vision, seeing each success as a piece in a constantly evolving mosaic of objectives.
- **INTEGRITY:** We care for our employees and consumers. Our decisions and actions are guided by values such as transparency, honesty, and fairness. Always oriented towards a long-term perspective, we work with respect for clients, employees, suppliers, and shareholders, and we are committed to ensuring the highest standards in terms of quality, safety, and efficiency.

→ DIVERSITY AND INCLUSION: We value diversity. We leverage the experiences and strengths of our employees and clients to do our best and make things happen. We work with and for communities to ensure that technology is an enabling factor for achieving goals. Each of us, regardless of level, role, or function, plays a fundamental role in achieving our mission.

## 1.2 Highlights

As of today, the Group has 1,054 employees, of which 57% are women. 92% of the employees are based in southern Italy, with about half working in Sardinia at the Group’s headquarters in Sa Illetta (Cagliari).



Men  
43%



Women  
57%



30-50 y.o.  
70%



>50 y.o.  
27%

### Network coverage 2023

#### Fixed wireless access network:

24 million households and businesses covered

#### Fibre

28 million households and business

**1,054** employees **576** of whom in **Sardinia**



### 8,753 active points of sale

throughout the country, 4 of which are single brand outlets

**1,021.6 thousand users**, of which **292.6 thousand** with fixed broadband access (of which 274,9 thousand Fibre)

**401 thousand** with fixed wireless access

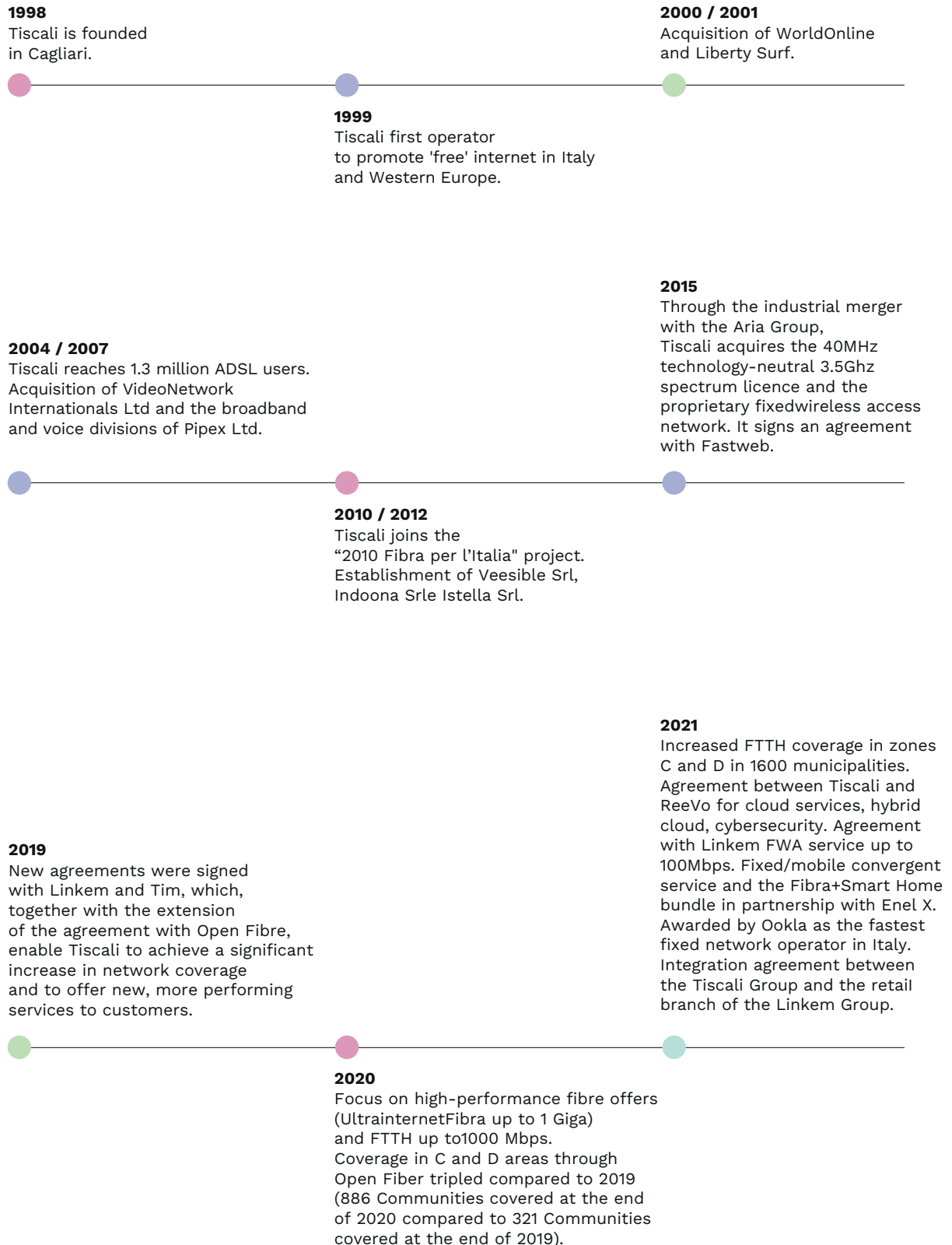
**328 thousand** mobile MVNO customers

**€ 231.2 million\*** total revenues as at 31 Dec 23\*

**€ 34.7 million\*** net EBITDA as at 31 Dec 23\*

\*Source: Tessellis Group 2023 Annual Financial Report - Management’s Report Section

## 1.3 The Group's History



**2022**

On 1 August 2022, the new Tessellis Group is born, following the merger of the Tiscali Group and the Linkem Group's retail unit. The Group is confirmed as the third largest operator in the fixed market and the first in the ultrabroadband access segment in FWA+FTTH technologies, considered the most innovative and promising, with an overall market share of 13.9%. Among the major participations acquired with the Linkem branch there is 3P Italia, leading company in the development of digital innovation projects in public private partnership.

**2023**

In 2023, Tessellis focused on developing the Ultrabroadband market, which continues to expand its coverage across the national territory, and on the mobile market. The advertising campaigns carried out in 2023 (multimedia on TV – Mediaset – and Digital, focusing on YouTube and connected TV) had positive effects on key brand performance indicators and sales from the web channel.

In 2023, the Media Division further consolidated its model of an open, multimedia, multi-access ecosystem aimed at multiplying and qualifying the portfolio of contacts, interactions, and multichannel engagement, thus increasing advertising revenue and value generation.

B2B activities continued throughout 2023. Specifically, the strategic partnership between Tiscali Italia S.p.A. and FibreConnect S.p.A. continued, focusing on developing the ultrabroadband market (through the creation of an FTTH infrastructure) in selected industrial and artisanal areas. Additionally, Tiscali furthered its commitment to supporting Italian schools with solutions for new learning environments, according to the Scuola 4.0 guidelines, and continued the incubation phase of its digital agriculture services suite, aiming to design a digital transition process for the territory with agricultural enterprises (through the Linkem 4Farm solution). In December 2023, Tiscali was selected for the IPCEI-CIS European Project and will lead the development of Multimodal Generative Artificial Intelligence with its Villanova Project. From a corporate perspective, Tiscali undertook the following operations in 2023:

1. In October 2023, it acquired a 16% stake in Aetherna, increasing its share from 49% to 60%. Aetherna is a specialized operator in providing digital services in the hospitality sector.
2. In November 2023, it signed an investment agreement with Go Internet. Upon completion, this operation will allow Tiscali to expand its service portfolio, sales network, and B2B customer base, accelerating the achievement of one of the pillars of its business plan.

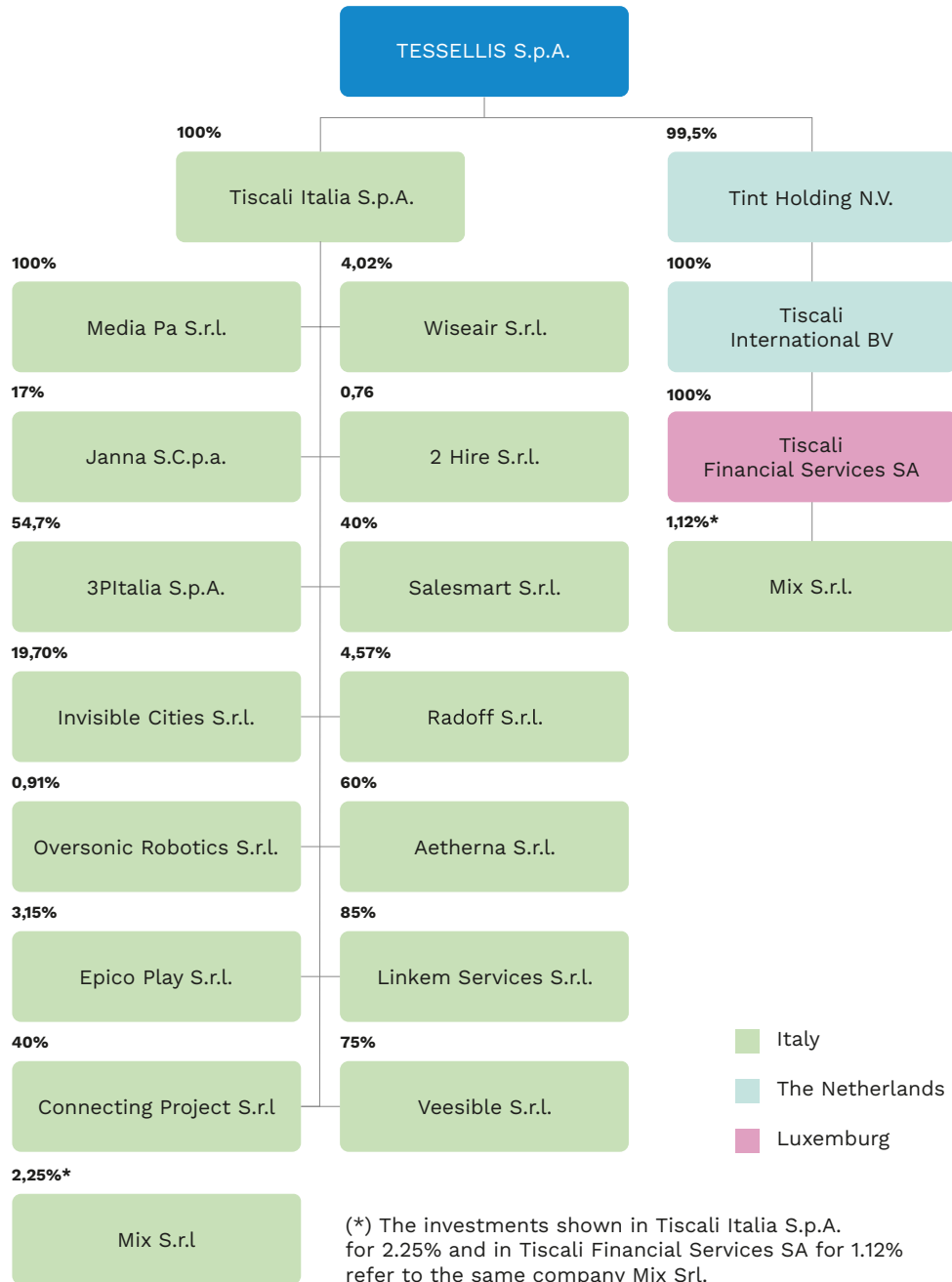
Financially, Tiscali strengthened its capital structure by realizing total capital increases of EUR 23.5 million in 2023.

In 2023, despite a challenging context, the Company successfully upheld its commitments to all stakeholders, actively contributing to finding a sustainable growth path in collaboration with its employees, customers, suppliers, and local communities.

For more detailed information regarding the Company's economic and financial impacts, please refer to the 2023 Consolidated Financial Report, specifically the section "Assessment of Going Concern".

## 1.4 The Group's structure

As of 31 December 2023, the Tessellis Group was structured as follows:





## 1.5 Shareholding Structure

Tessellis S.p.A. is a joint-stock company organized under the laws of the Italian Republic. Tessellis shares have been listed on the Italian Stock Exchange since October 1999.

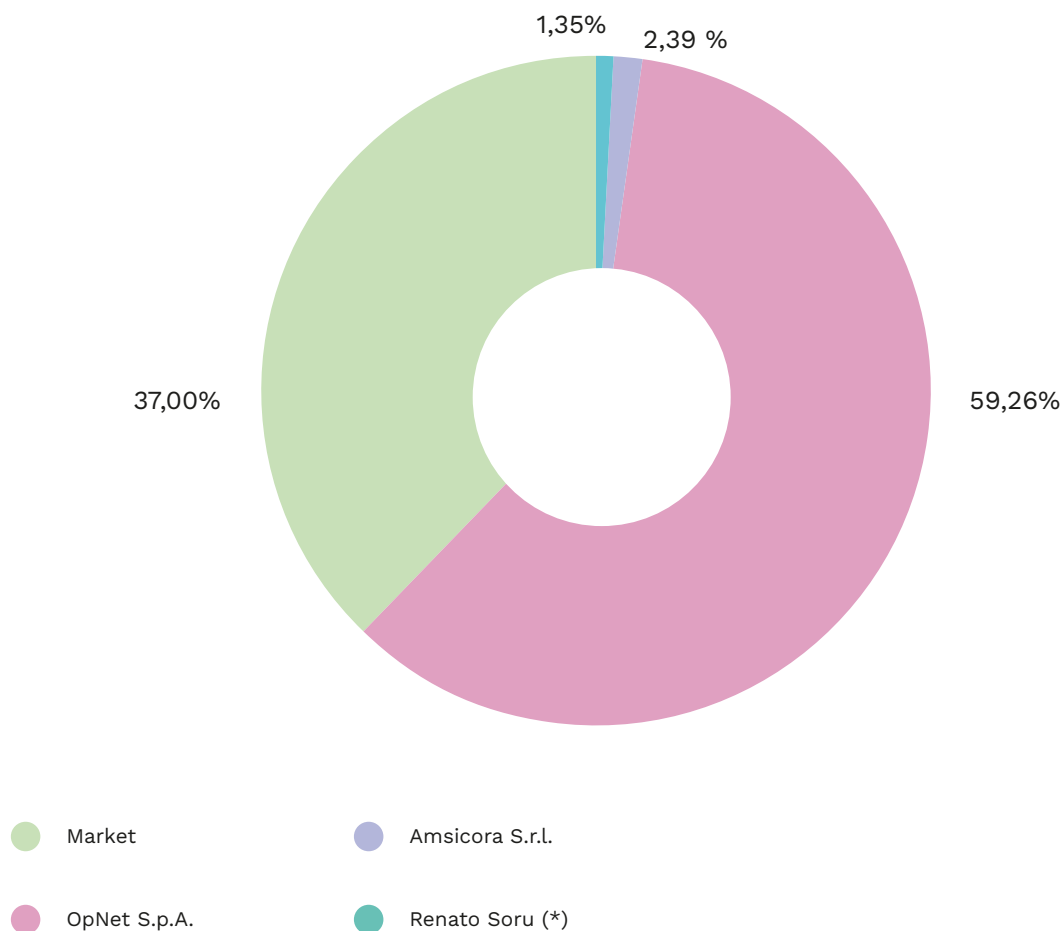
The following is the shareholder structure of Tessellis as of 31 December 2023:

**As of 31 December 2023:**

Share Capital: EUR 208,992.7 thousand, corresponding to 234,067,207 shares without nominal value;

Average annual market capitalization: EUR 139.9 million<sup>1</sup>.

Fig. 1 Shareholding structure: % ordinary share capital and voting rights



Source: Tessellis. (\*) Directly for 1.13% and indirectly through the subsidiaries Monteverdi Srl (0.08%) and Cuccureddus Srl (0.14%).

<sup>1</sup> Calculated on the December 2022 average value per share of 0.73266 on the number of shares as of 31 December 2022 equal to total shares of 177,509,104.

## 2. Governance and sustainability

### 2.1 Governance

#### Corporate Governance Structure

In order to ensure management transparency, proper market information, and the protection of socially relevant interests, Tessellis’ corporate governance system largely follows the recommendations of the Corporate Governance Code (hereinafter also referred to as the “Code”) approved by the Corporate Governance Committee in March 2006 and subsequently updated. The Group adheres to practices and principles of conduct formalized in procedures and codes, in line with the guidelines of Borsa Italiana, CONSOB recommendations, and national and international best practices. Tessellis has established an organizational structure capable of properly managing business risks and potential conflicts of interest that may arise between Directors and Shareholders, between majorities and minorities, and among various stakeholders. Tessellis’ governance structure is characterized by the following bodies:

#### Board of Directors

- Shareholders’ Meeting
- Board of Statutory Auditors
- Internal Committees
- Supervisory Body

The Board of Directors is supported in its functions by the following committees:

- Appointments and Remuneration Committee
- Control, Risks, and Sustainability Committee
- Related Parties Committee

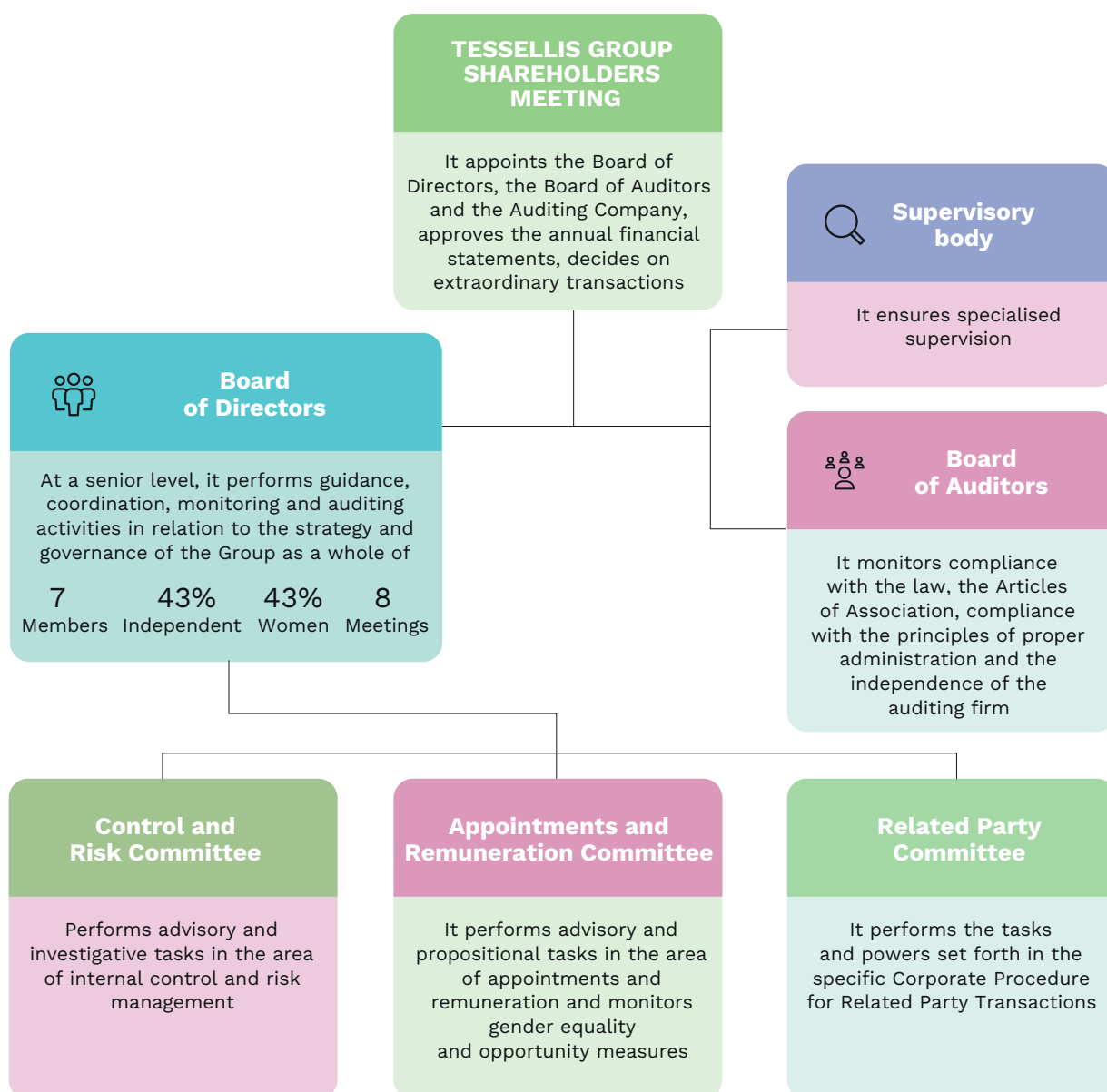
#### Board of Directors

As of 31 December 2023, the Board of Directors consists of seven members<sup>2</sup>, including three women and three non-executive and independent Directors:

Table 1 – GRI 405-1a: Composition of the Board of Directors by gender and age group (%)

Number of persons	2022			2023				
	<30	30-50	>50	Totale	<30	30-50	>50	Total
Men	-%	-%	60%	<b>43%</b>	-%	67%	50%	<b>57%</b>
Women	-%	100%	40%	<b>57%</b>	-%	33%	50%	<b>43%</b>
<b>Total</b>	<b>-%</b>	<b>28%</b>	<b>72%</b>	<b>100%</b>	<b>-%</b>	<b>43%</b>	<b>57%</b>	<b>100%</b>

<sup>2</sup> For the sake of completeness, it is hereby acknowledged that on 31 January 2023, the directors Alberto Trondoli and Cristiana Procopio tendered their resignations and that the Board of Directors of Tessellis S.p.A. met on 26 April 2023 and co-opted the directors Andrew Theodore Holt and Jeffrey Robert Libshutz.



The Board was elected based on the single list jointly submitted by Renato Soru and Amsicora S.r.l. and will remain in office until the approval of the financial statements as of 31 December 2024<sup>3</sup>. Regarding the Board members, the Group regularly conducts induction and onboarding activities, especially concerning the processes and policies in place at the corporate level. Specifically, it is a well-established practice to share existing policies, particularly those related to sustainability issues, such as the Diversity Policy, the Code of Ethics, the Model 231, and others. All details regarding the Board of Directors (term of office, qualifications, the number and nature of other positions) are provided in Chapter 5 of the Tessellis' Report on Corporate Governance and Ownership Structures, included within the 2023 Consolidated Financial Report, to which reference should be made.

<sup>3</sup> With regard to the co-opted directors, we await the decisions of the Shareholders' Meeting to be convened, inter alia, for the approval of the Financial Statements.

**Board of Auditors**

The members of the Board of Statutory Auditors operate with autonomy and independence, in constant liaison with the Control and Risk Committee and the Internal Audit function, in line with the principles and application criteria set forth in Article no. 8 of the Italian Stock Exchange Corporate Governance Code.

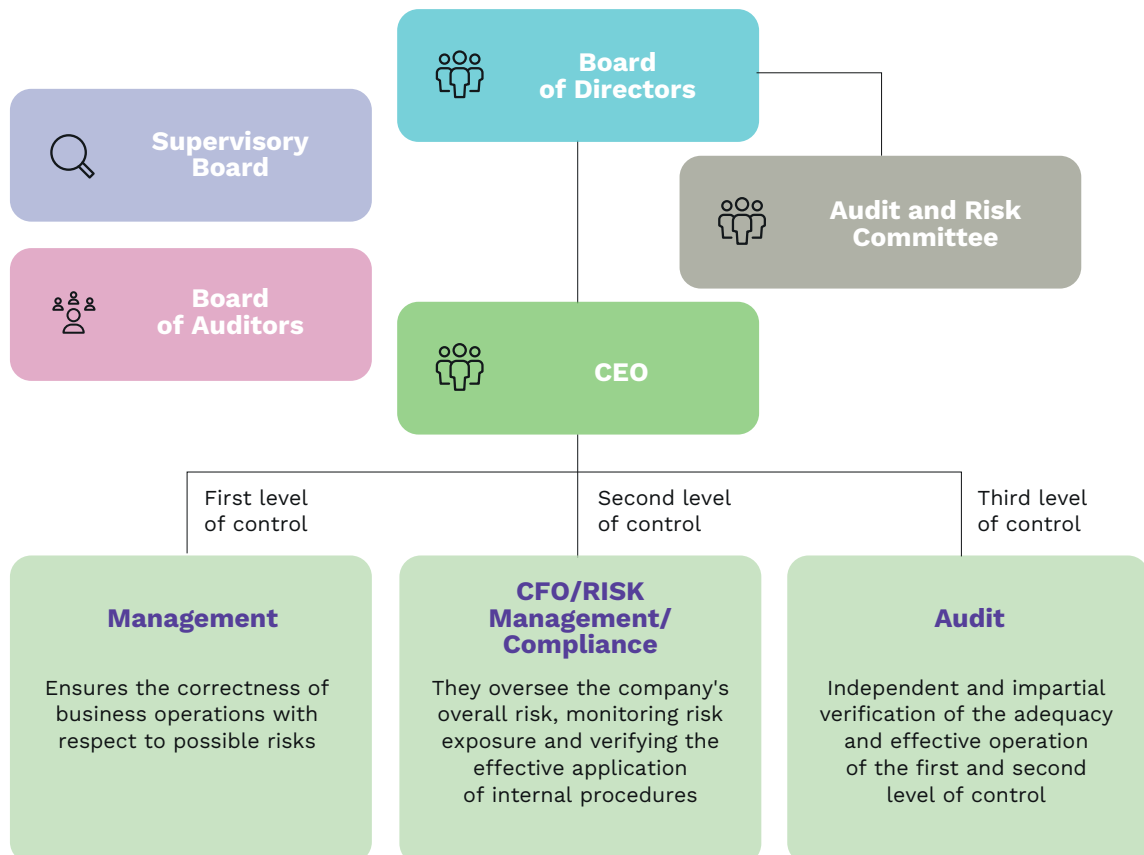
**2.2 Internal Control and Risk Management System**

**Internal Control System**

The current internal control framework aligns with the principles and application criteria outlined in Article no. 6 of the Corporate Governance Code for listed companies. It comprises a set of rules, procedures, and organizational structures designed to enable an appropriate process for identifying, measuring, managing, and monitoring key risks, as well as ensuring a sound, proper, and goal-consistent conduct of the business.

This system is implemented through the activities of the following bodies:

- Risk Control Committee;
- Chief Executive Officer;
- Internal Audit.



The **Risk Control Committee**, established by the Board of Directors and currently composed of Tessellis S.p.A.'s three non-executive and independent Directors, has advisory and propositional functions. Its objective is to enhance the functionality and directive capacity of the internal control and risk management system of the Board of Directors.

The **CEO** operationally implements the Board of Directors' guidelines on internal control.

The **Internal Audit** department is independent of the area managers and carries out its responsibilities in line with the recommendations of the Code. The Internal Audit function reports directly to the Chairman of the Board of Directors and administratively to the CEO.

### **The Organization, Management and Control Model pursuant to Legislative Decree no. 231/2001**

The Tessellis Group is constantly committed to ensuring conditions of fairness and transparency in the conduct of business and corporate activities, to protect its position and image and the expectations of all its stakeholders, first and foremost its shareholders and employees.

To this end, since 2005 both Tessellis S.p.A. and Tiscali Italia S.p.A. have adopted the Organization, Management and Control Model pursuant to Legislative Decree no. 231/2001 (hereinafter also referred to as the "231 Model").

All of the Group's legal entities with a 231 Model in place in 2022 have carried out activities to assess the risks of corruption towards the public administration and towards private parties.

The principles and rules of conduct contained in the Model are supplemented by the Code of Ethics adopted by the Companies and available on the issuer's website in the Documents section, at this link <https://www.tessellis.it/codice-etico/>.

The Supervisory Board (hereinafter also referred to as the "SB") has the task (i) to supervise the effectiveness and adequacy of the 231 Model, in relation to its effective capacity to prevent the commission of the predicate offences set forth in Legislative Decree no. 231/2001, the compliance with the 231 Model by all recipients and the updating of the 231 Model by management; as well as (ii) to intervene on the structure and/or contents of the 231 Model where the need to adapt it to changed organizational conditions and/or new regulations is identified<sup>4</sup>.

On the basis of the provisions of the 231 Model, the Supervisory Board reports to the Board of Directors on its activities, at least every six months, and may report at any time any critical issues relating to the application of the Model.

At the date of drafting this Statement, the activity of updating the 231 Models of Tessellis S.p.A. and Tiscali Italia S.p.A. is being completed in the light of the recent regulatory changes relevant to the Company (with particular regard to the new predicate offences concerning non-cash payment instruments and the protection of cultural heritage), as well as the organizational and structural changes that have affected the Tessellis Group in the 2022 financial year as part of the Merger

<sup>4</sup> At the date of drafting this Statement, the activity of updating the 231 Models of Tessellis S.p.A. and Tiscali Italia S.p.A. is being completed in the light of the recent regulatory changes relevant to the Company (with particular regard to the new predicate offences concerning non-cash payment instruments and the protection of cultural heritage), as well as the organizational and structural changes that have affected the Tessellis Group in the 2022 financial year as part of the Merger transaction. In particular, as per the information formalized at the Board of Directors meeting of Tessellis S.p.A. held on 11 May 2023, the drafting of the catalogue of relevant offences has been completed, while the drafting of the final version of the 231 Model continues. It will be presented to the Board in its final version as soon as the scope of the procedures in place in the Company and its operating subsidiary Tiscali Italia S.p.A. has been formalized. In addition, on 28 September 2023, the so-called Whistleblowing Procedure was approved pursuant to Legislative Decree no. 24 of 10 March 2023, for the purpose of managing, receiving, analyzing and processing reports relating to possible irregular conduct, however named, put in place within the scope of the Company's activities and potentially contrary to the 231 Model, the Code of Ethics and/or one or more corporate procedures of the Tessellis Group.

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### **The risk assessment system on financial reporting**

The assessment of risks related to financial reporting is conducted both at the overall corporate level and at the specific process level. At the corporate level, this includes risks related to the improper functioning of key corporate governance tools or the company's information system. At the process level, risks associated with financial reporting (such as inaccuracies, incompleteness, incorrect timing, underestimation, overestimation of estimated items, etc.) are analyzed in relation to specific associated accounts and are addressed through the creation of control objectives. For further details on sustainability risks, please refer to Section 2.6 Main Sustainability Risks of this Non-Financial Statement.

### **The fight against active and passive corruption**

In line with the Group's commitment to fighting active and passive corruption, the internal control system has been strengthened through the adoption of specific behavioral protocols outlined in the Special Part of the 231 Model dedicated to offenses against Public Administration and corruption between private individuals. These protocols consist of obligations and/or prohibitions that apply both internally and to external parties interacting with Tessellis. To enhance and maintain its integrity and reputation, the company monitors and oversees the most sensitive business activities, especially relations with public entities, suppliers, consultants, partners, and employees. These activities, deemed "sensitive" and thus more risky, are identified following internal risk assessment operations. Consequently, the Group defines, implements, and disseminates specific corporate policies that regulate the conduct of sensitive activities or those connected to them. These policies also aim to control and detail the reporting system and information flows to the Supervisory Body.

It should be noted that no corruption incidents occurred during 2023.

In general, the Group establishes the obligation to collect and retain documentation related to any contact with the Public Administration and prohibits any activity that, even through an intermediary, could influence independent judgment or secure any advantage for the Company. Additionally, the Company is committed to strictly adhering to, in addition to applicable legal provisions, the regulations issued by national and international market regulatory authorities aimed at ensuring fair and healthy market conditions and fostering free competition.

It should be noted that no instances of non-compliance with laws and regulations occurred during 2023. Furthermore, no reports of legal actions concerning anti-competitive behavior, violations of anti-trust laws, and/or monopolistic practices were made during 2023.

Similarly, no reports were made to the Board of Directors regarding negative impacts, potential or actual, concerning the organization's conduct in its operations and business relations during 2023.

### The Whistleblowing Procedure

The Tessellis Group has updated its Whistleblowing Procedure, which ensures that employees and external parties can report potential irregularities or violations related to laws, rules, and company procedures (including, but not limited to, the Code of Ethics, the Internal Control System, the procedures for managing corporate information, or the Organizational Model pursuant to Legislative Decree no. 231/2001). The Whistleblowing Procedure guarantees the highest level of confidentiality and privacy in handling received communications, protecting both the whistleblower and the reported party, while upholding the values of transparency, freedom, sustainable success, and responsible action that are core to the Tessellis group.

Additional communication tools have been adopted to collect any reports from interested parties. Those aware of events linked to risks or corruption offenses can submit written reports through the IntegrityLine platform accessible at [tessellis.integrityline.com](https://tessellis.integrityline.com), which has been adopted by the Company, or orally via the voicemail available on the IntegrityLine platform. For further measures, please refer to the Whistleblowing Procedure.

For reports related to the Organizational and Control Models pursuant to Legislative Decree no. 231, the channels provided by the Supervisory Body remain available: [organismo.divigilanza@tessellis.it](mailto:organismo.divigilanza@tessellis.it) or [organismodivigilanza@tiscali.com](mailto:organismodivigilanza@tiscali.com).

### Corporate Tax Policy

The Group's fiscal governance is inspired by the principles contained in the Company's Code of Ethics. Tessellis believes that full transparency towards tax authorities and full compliance with tax obligations are essential duties as a taxpayer and part of its social responsibility towards the Country's institutions.

The Tax Risk Manager, an autonomous figure within the corporate structure, is responsible for monitoring compliance with tax obligations and providing tax consultancy. Specifically, the Tax Risk Manager must identify, mitigate, and control tax risk, understood as compliance risk, i.e., the risk of incorrect adherence to tax regulations. Therefore, this role involves mapping the Company's tax risks arising from business activities.

Through an effective system of detection, measurement, management, and control of tax risk, the Tax Risk Manager ensures continuous oversight of all business processes, not only those of a tax nature. This includes procedures for purchasing goods and services, handling elements of both the passive and active cycles, contractual clauses, etc., to ensure that the Company's activities are conducted in compliance with tax regulations and in accordance with the principles or purposes of the legal framework.

In general, Tessellis: (i) operates according to principles of honesty, fairness, and compliance with tax regulations; (ii) adopts behaviors geared towards proactive communication with tax authorities and maintains relationships based on transparency, dialogue, and collaboration; (iii) has not established companies located in tax havens; (iv) applies transfer pricing policies to avoid erosion of the taxable base; (v) regularly reports tax-related items and expenses in its annual financial statements.

Additionally, it is noted that the Group has not, to date, received any inquiries from its stakeholders regarding tax aspects.

### Diversity Policy

The policies implemented by the Tessellis Group to conduct business activities responsibly and transparently towards its stakeholders include the Diversity Policy (hereinafter referred to as the

“Diversity Policy”), adopted by Tiscali S.p.A. since 2018 and subsequently updated on 5 April 2022, provides non-binding guidelines on aspects such as age, gender, geographical origin, and the educational and professional background of the members of the Board of Directors of Tiscali S.p.A. (hereinafter also referred to as “Tiscali” or the “Company”).

The purpose of the Policy is to identify the criteria for a qualitative and quantitative composition of the Board of Directors that is functional to the effective performance of the tasks and responsibilities assigned to the management body. This is achieved also through the presence of individuals who ensure a sufficient plurality of perspectives and skills necessary for a good understanding of the market and current business, as well as the long-term risks and opportunities related to the company’s activities.

One of its guiding principles is the enhancement of diversity as a fundamental element for the medium-long-term sustainability of the business activity, a key pillar both for the employees of the Tessellis Group and for the members of Tiscali’s administrative and control bodies.

The Board of Directors of Tiscali and the Board of Statutory Auditors of Tiscali, while respecting the prerogatives of the Shareholders in the designation and appointment of their members, aim for a composition that integrates diverse managerial and professional profiles, including international ones. They also consider the importance of balanced gender representation and the benefits that can arise from the presence of different age groups and lengths of service.

Tiscali also prioritizes creating a collaborative climate and an inclusive environment within its administrative and control bodies, where each member can fully express their potential and maximize their contribution.

For more detailed information on the types of diversity and related objectives for the Board of Directors and the Board of Statutory Auditors, the methods of implementing the policy, its monitoring, and updates, please refer to the Diversity Policy.

## 2.3 The regulatory and competitive environment

Tessellis promotes fair competition, considered functional to its own interests and to those of all market operators, customers and stakeholders, favoring initiatives and projects in collaboration with competitors, and actively participating in technical tables set up by sector authorities or trade associations. In this context, the Group’s main interlocutors are as follows:

- other sector operators;
- the Autorità per le Garanzie nelle Comunicazioni – Communications Guarantee Authority (AGCOM);
- the Autorità Garante della Concorrenza e del Mercato – Competition and Market Authority (AGCM);
- the Ministry of Enterprise and Made in Italy (MiMIT) – Communications Department;
- Infratel;
- the Trade Associations;
- the European Institutions.



### Relations with other Operators

Tessellis operates in its target market by adhering to principles of freedom, transparency, and interoperability in its relationships with competitors. In doing so, it strives to ensure the highest degree of innovation and competitiveness among sector operators, fostering a genuinely level playing field regardless of the technical and commercial solutions adopted.

In this context, Tiscali collaborates both with the Incumbent and with Other Authorized Operators (OAOs), actively participating in technical committees of mutual interest and advocating for the peaceful resolution of any disputes.

### Relations with AGCOM and AGCM

The electronic communications market is governed by regulations that outline the conduct of operators in offering services and ensure fair and transparent competition. In this context, Tessellis is subject to the ex-ante regulation by the Autorità per le Garanzie nelle Comunicazioni – Communications Guarantee Authority (AGCOM) and the ex-post regulation by the Autorità Garante della Concorrenza e del Mercato – Competition and Market Authority (AGCM). These authorities are established to ensure proper competition among market operators and compliance with rules prohibiting anti-competitive agreements between companies, abuses of dominant positions, and concentrations that could create or reinforce dominant positions harmful to competition.

Tessellis engages with these sector authorities by pursuing genuine dialogue and continuous consultation to establish straightforward, effective, and symmetrical regulation that enhances the Group's value. Additionally, whenever the authorities request data or information of various kinds or initiate consultation procedures, Tessellis provides the required responses, ensuring the completeness and reliability of its contributions, as evidenced by the summary of consultations conducted during the year, detailed in the Annual Financial Report.

Similarly, in line with the authorities' goal of protecting consumers, especially regarding service quality and transparency, Tessellis is committed to communicating accurate commercial information in a clear and understandable manner.

Notably, among the regulatory procedures in which Tiscali Italia S.p.A. actively participated, the following are highlighted

- AGCOM Resolution no. 23/23/CONS, which concludes the procedure for adopting provisions on the quality and service charters for mobile and personal communications.
- AGCOM Resolution no. 156/23/CONS, which concludes the procedure for adopting provisions on the quality and service charters for electronic communications services accessible to the public from fixed locations.
- AGCOM Resolution no. 436/22/CONS, which initiates the procedure for reviewing the regulations and quality indicators of customer service.
- AGCOM Resolution no. 307/23/CONS, which concludes the work on implementing the Electronic Communications Code concerning the protection of end-users with the adoption of the new "Regulation containing provisions for the protection of users in contracts for the provision of electronic communications services".

In the fall of 2023, all measures outlined in Resolution no. 9/23/CONS regarding “Systems for protecting minors from cyberspace risks” were implemented.

Finally, it should be noted that during 2023, there were no instances of anti-competitive behavior, violations of anti-trust laws, or monopolistic practices by the Group.

### **Relations with the Ministry of Enterprise and Made in Italy**

The Group interfaces with the Ministry of Enterprises and Made in Italy (MiMIT) for the request of authorizations and resources managed by the Ministry, primarily numbering and frequencies, by providing technical plans and updates as required by current regulations. Furthermore, the Group participates in technical working groups aimed at defining the technical specifications under the Ministry’s competence and contributes to the creation and updating of resource databases (numbering, infrastructure, etc.) by supplying data according to the specified requirements.

In June 2023, Tiscali Italia participated in the consultation initiated by MiMIT aimed at gathering market opinions on the application of the new Electronic Communications Code, in alignment with the objectives identified within the Strategy for a Digital Single Market in Europe.

### **Relations with the DDT (Department for Digital Transformation)**

The DDT (Department for Digital Transformation) is a department of the Presidency of the Council of Ministers responsible for the development of key projects for the innovation and digital transformation of the Country. Among other activities, the DDT represents Italy in the European project aimed at developing a community-wide solution to the management of Big Data.

In the realm of digital technologies, the Group has actively engaged in the construction of a significant Important Project of Common European Interest (IPCEI), specifically aimed at promoting a “European Cloud Ecosystem” with the objective of building the next generation of cloud services for large companies and the public sector. Within this framework, Tiscali has been selected by the European Commission for the development of Multimodal Generative AI services.

### **Relations with Infratel**

Infratel Italia (Infrastrutture e Telecomunicazioni per l’Italia S.p.A.) is an in-house company of the Ministry of Enterprises and Made in Italy, under the coordination and direction of the Invitalia Group. One of the main measures aimed at promoting the widespread adoption of Ultrabroadband connectivity services throughout the country is the “connectivity voucher”. In this context, Tessellis constantly interfaces with Infratel to address all issues related to the implementation of the facilitated measures and to provide prompt responses to requests for clarification regarding reports and complaints forwarded by its customers directly to Infratel. Additionally, the Group participates in the discussion table between Infratel and the relevant stakeholders concerning the initiation of a further phase of the Voucher plan for families without income limits.

### **Rapporti con Associazioni di Categoria**

Tessellis manages associative relationships and coordinates representation activities with Confindustria and other trade associations at both national and local levels.

The Group is a member of the main trade associations, including:

- Confindustria Digitale (CD) and the Association of Telecom Companies;
- ASSTEL, the Association of Telecommunications Operators. Within ASSTEL, Tiscali participates in the Regulatory and Institutional Working Group, which oversees the legislative and regulatory process relevant to the telecommunications sector.

### Relations with European Institutions

Tessellis collaborates with the European Commission, in particular with the Departments that have competence in the field of communications, and with BEREC (Body of European Regulators for Electronic Communications) both by transposing Directives that are immediately operational in the national territory and by providing data and information requested periodically through questionnaires.

## 2.4 Voluntary standards: the certification policy

Tiscali Italia S.p.A. has the following active and certified Management Systems in place:

- **ISO 9001-compliant Quality Management System complying with the**, which has already been renewed on 11 January 2023 by the certification body Quaser and will be validated again with the audit on 1 and 2 February 2024 by the certification body Bureau Veritas.
- **ISO 27001-compliant Information Security System**. In addition to this certification, Tiscali Italia S.p.A. confirmed on 12 September 2023 the new **ISO 27017** and **ISO 27018** extensions with the certifying body Bureau Veritas.

The Company, in relation to the renewals, has decided to consolidate the audit activities previously performed by BSI and Quaser under Bureau Veritas. Bureau Veritas will handle the eight certifications of the Group in just two annual sessions, thereby integrating the certification synergies under a single entity.

In addition to the aforementioned ISO 9001 and ISO 27001 Management Systems, in 2020 Tiscali introduced two new Management Systems within its organization:

- **ISO 22301-compliant Business Continuity Management System**, obtained in January 2020, was re-certified in 2020. The latest certification renewal was carried out on 12 September 2023;
- **ISO 20000-1-compliant IT Service Management System**, obtained in January 2020, was re-certified in 2020. The latest certification renewal was obtained on 12 September 2023.

Specifically, the **ISO 22301** certification is the declaration, by the chosen certifying body, that the system itself is compliant with the reference standard (“Company security – Business continuity management systems – Requirements and guidance for use”) and that the business continuity management procedures are consistently applied by the Group. The standard adopted by Tiscali therefore aims to safeguard the company from potential interruptions caused, for example, by extreme weather conditions, fires, floods, natural disasters, IT disruptions, terrorist attacks, pandemics, and others. In addition, it allows the company to identify relevant threats and to identify the critical functions that could be affected and thus be able to plan in advance the solutions to be implemented to ensure its own business continuity and that of its business and consumer customers. Thanks to the ISO 22301 standard, Tiscali can identify and manage business threats with structured and tested processes and can therefore proactively minimize the impact on the business in the event of an adverse event. Obtaining this certification, in short, guarantees the protection of information and the security of systems with regard to technological, operational, procedural and environmental

aspects. Thanks to the adoption and implementation of the ISO 22301 standard, Tiscali can thus demonstrate its resilience to customers, suppliers and when participating in tenders.

The **ISO 20000-1** certification is the declaration, by the chosen certifying body, that the IT service management and control system complies with the reference standard (“Information technology – Service Management – Service management system requirements and user guide”) and that the service management procedures are constantly applied by the Group.

This certification is dedicated to the concept of “quality” in the IT field, guaranteeing the company’s compliance with international requirements aimed at promoting the reliability of services and their level of quality. Tiscali certifies the business sales division, the ICT Datacenter and Cloud and IP and Telephony services. Obtaining ISO 20000-1 certification enhances Tiscali’s corporate identity and reputation in the reference sector, thus ensuring its customers uniformity of processes and attention in the management of IT activities, as well as minimizing risks.

The Tessellis Group’s scope also includes the subsidiary 3P Italia S.p.A. for the “Design, implementation and management of services under concession for the automation, innovation and digitalization of public services” domain, which has obtained compliance with the requirements of the ISO 9001:2015 standard from the Axe Register Certification Body. The first issue date is 13 January 2020; on 11 January 2023 a renewal was obtained, extending the expiry date to 12 January 2026.

Since 2019, Tiscali Italia S.p.A. has held the **ISO 14001** certification attesting to the adoption of an Environmental Management System in compliance with the standard in question. The certification, obtained on 16 December 2019 and subject to annual review, was renewed on 4 and 5 December 2023, confirming the Group’s attention and sensitivity to environmental issues. For more details on this certification, please refer to Paragraph “6.2 – ISO 14001 Environmental Certification”.

As further confirmation of the Group’s commitment to the constant integration of the broader scope of qualifications that can be pursued, on 24 October 2022 the **ISO 45001** certificate was acquired concerning the “**Management systems for occupational health and safety – Requirements and guidelines for use**” in the area of development, sale and remote assistance of ICT and Cloud data center systems and services, IP connectivity and telephony for the Corporate and Public Administration Division. The last renewal took place on 4 and 5 December 2023.

On that date, **the scope of certification for both of these certificates was also extended** from the single Corporate and Public Administration Division (renamed HVB High Value Business) to all Corporate Divisions residing within the scope of the Tiscali Campus.

Specifically, the rules adopted have been extended in order to identify and define the significant risks associated with the activities/tasks performed by the company within its Campus and describe the related operational controls.

Procedures have also been drawn up in order to define the activities for managing information on accidents and incidents (near-misses) in order to search for possible causes and design possible improvement measures. In addition, the criteria with which the identification of dangers (safety and health), the assessment of risks and the determination of the necessary controls are carried out in accordance with the regulations in force, apply to all work carried out by the organization’s employees (according to the definition of “worker” and pursuant to Article no. 3 of the Legislative Decree no. 81/08 and subsequent amendments and integrations), both inside the company premises and at external workplaces.

They also apply to personnel who, for whatever reason, go into workplaces that are under the organization's control (visitors, contractors, etc.), taking into account:

- Ordinary and extraordinary activities, presence of external personnel, third parties in general;
- Environmental risks that originate outside or close to the workplace;
- Risks related to changes in work areas, service delivery processes, installations, machines, equipment, raw materials, substances, procedures and work organization;
- Changes in applicable legislation.

During the year 2023, the following compulsory training was carried out:

- Occupational Safety course for managers (20 persons);
- Occupational Safety Training for non-managerial employees (374 persons);
- First Aid and BLS (8 persons in Bari and 9 in Taranto);
- Fire-fighting course (9 persons in Bari and 9 in Taranto);
- Basic training for access to confined spaces (9 persons);
- Basic training + specific training for video screen operators (for the 49 new hires at the Cagliari site);
- Specific training for minor maintenance workers (2 persons);
- Refresher courses for RSPP and ASPP (3 persons);
- Occupational Health and Safety teacher-trainer course (1 person).

With regard to 2023, in agreement with the Bureau Veritas Certification Body, which supports the Group in the Continuous Improvement action in all areas subject to certification, a Training Plan was planned to increase both the global and specific skills of the team operating in Business Processes & Compliance.

In particular, training regarding Safety at Work was completed in the first half of 2023 for 550 people, including ex-ESA colleagues and ex-Linkem colleagues with five-year renewal expired.

With regard to the former Business Processes & Compliance team (now People Value - Quality & SPPA), the following specific training sessions were carried out for internal auditors:

- ISO 27001, 2000, 22301 from 8 to 16 June 2023 for a total of 32 hours (8 persons);
- ISO 14001, 45001 and 9001 from 26 to 29 June 2023 for a total of 32 hours (3 persons).

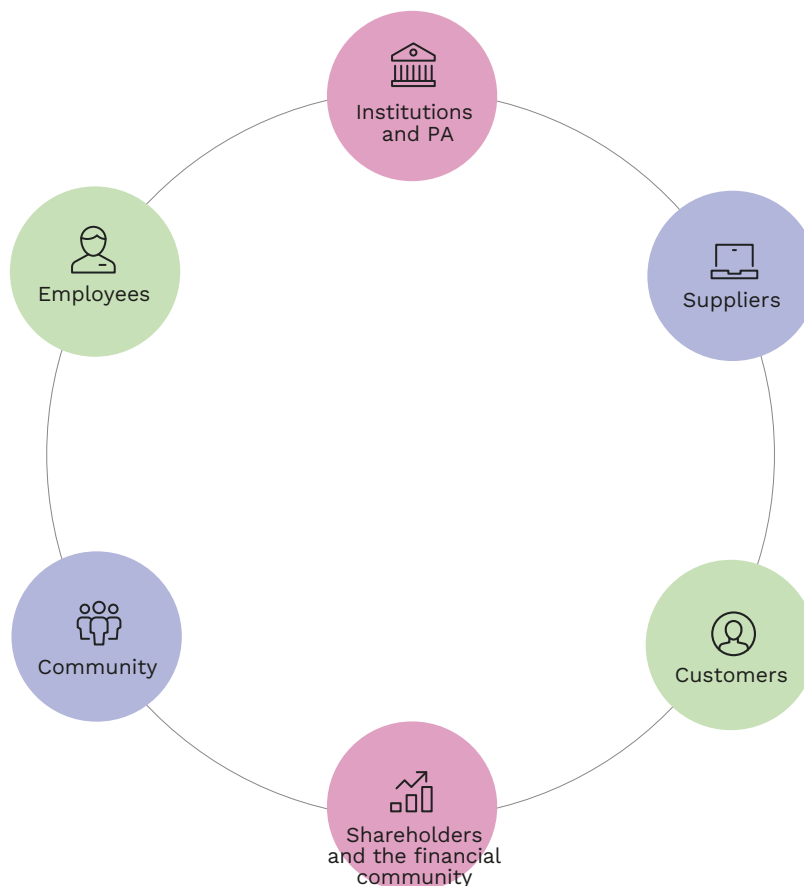
## 2.5 Stakeholder mapping and materiality analysis

### Stakeholder Mapping

Tessellis cares about its stakeholders and devotes particular attention to defining the ways in which it engages and interacts with them. These involvement activities are aimed at developing a relationship based on trust, transparency and sharing, enabling Tessellis to understand what its stakeholders' needs and expectations are.

Interaction with its stakeholders allows Tessellis to strengthen its understanding of the needs and priorities with respect to the relevant issues of its strategy, and to gather input on possible areas of development, in order to increase the ability to create shared value between the Group and its stakeholders.

Below are the main stakeholders identified by the Group as a result of the materiality analysis conducted in previous editions of the DNF, and confirmed in 2022 following an update carried out when identifying the positive and negative impacts generated by the Group, which are further detailed in the following sections.



### Methods of involvement

Tessellis has defined ways of involvement aimed at interacting with its stakeholders, referring to different mechanisms of communication, listening and dialogue.

Below are the different ways of involvement for each stakeholder’s category:

 <p><b>Customers</b></p> <ul style="list-style-type: none"> <li>• <b>Customers</b></li> <li>• <b>Consumer associations</b></li> <li>• Internet channels</li> <li>• Social channels</li> <li>• Customer satisfaction surveys</li> </ul>	 <p><b>Employees</b></p> <ul style="list-style-type: none"> <li>• <b>Employees</b></li> <li>• <b>Collaborators</b></li> <li>• <b>Trade Unions</b></li> <li>• Intranet</li> <li>• Performance appraisal</li> <li>• Internal climate surveys</li> </ul>	 <p><b>Suppliers</b></p> <ul style="list-style-type: none"> <li>• <b>Suppliers of goods, products and services</b></li> <li>• <b>Subcontractors</b></li> <li>• <b>Sales network</b></li> <li>• Code of Ethics</li> </ul>
 <p><b>Public Administration and Institutions</b></p> <ul style="list-style-type: none"> <li>• <b>Public Administration</b></li> <li>• <b>Regulatory bodies (Authority, Privacy, Antitrust, etc.)</b></li> <li>• <b>National and local government institutions</b></li> <li>• <b>Judiciary</b></li> <li>• <b>Judicial Authority Bodies</b></li> <li>• Public consultations and working tables</li> </ul>	 <p><b>Community</b></p> <ul style="list-style-type: none"> <li>• <b>Local Communities</b></li> <li>• <b>Universities and Research Centres</b></li> <li>• <b>Media and opinion leaders</b></li> <li>• Initiatives in favour of the territory and the community</li> </ul>	 <p><b>Shareholders and the financial community</b></p> <ul style="list-style-type: none"> <li>• <b>Shareholder</b></li> <li>• <b>Banks</b></li> <li>• <b>Investors</b></li> <li>• <b>Financial Analysts</b></li> <li>• <b>Rating agencies</b></li> <li>• Press releases</li> <li>• Periodic communication on corporate management</li> </ul>

### Materiality analysis

In compliance with the Global Reporting Initiative (hereafter also referred to as “GRI”) Standards, updated in 2021, and with the requirements of Legislative Decree no. 254/2016, Tessellis has focused the contents of its Non-Financial Statement on the aspects found to be relevant following the materiality analysis.

Following a careful analysis of its own reality and reference context, as no substantial changes have occurred with respect to the main areas of impact, the contents subject to reporting have been selected on the basis of the materiality analysis carried out in 2022, keeping the material themes identified unchanged.

The process of defining material themes, carried out in 2022 in compliance with the GRI Standards update that came into force for financial statements published as from 1 January 2023, allowed for the definition of material themes, i.e. those aspects that reflect the Group’s most significant impacts on the economy, the environment and people, including their human rights, also considering stakeholder assessments.

In 2022, the process of identifying relevant issues was carried out taking into account the impacts generated and most relevant to the Tessellis Group. The management, together with the CEO, identified, through a scenario analysis and a reconnaissance of stakeholder expectations, a number of issues relevant to the telecommunications sector and to the stakeholders themselves.

During this analysis, international sustainability guidelines, the regulatory context, the reference sector and the main competitors were also considered.

This process allowed management, together with the CEO, to determine the positive and negative impacts generated by the Tessellis Group (current and potential), associated with the 13 material issues and the 5 pillars that define Tessellis’ approach to sustainability, summarized below:



For a mapping of the main and most relevant impacts, see Chapter 6 – “Materiality Analysis – Definition of Impacts Related to Material Issues”.

The chapters of this Non-Financial Statement have been defined on the basis of the sustainability pillars and material issues identified, in order to focus the reporting on the relevant issues and describe in greater detail the current potential and actual impacts generated by the Group in relation to them.



## 2.6 Main sustainability risks

The main sustainability risks, which have already been identified in past years, and how they can be managed and mitigated, are presented in detail below.

Cyber Risk	
<b>Risk management and mitigation methods</b>	Implementation of data protection mechanisms for its customers, operating in strict compliance with current data protection and privacy legislation (see paragraph "4.2 - Customer satisfaction").
Going Concern	
<b>Identified risks ischi identificati</b>	<p>Monitoring through appropriate strategies the risks of service and business interruption caused by:</p> <ul style="list-style-type: none"> <li>- extreme environmental conditions (e.g. earthquakes);</li> <li>- extraordinary weather events (e.g. floods);</li> <li>- pandemics;</li> <li>- IT system malfunctions;</li> <li>- cyber attacks;</li> </ul> <p>that pose a threat to business operations. Such events, among others, can significantly affect the integrity of the infrastructure necessary for the proper delivery of communication services.</p>
<b>Risk management and mitigation methods: preventive measures</b>	<p>The Company has adopted technological and organizational solutions to operate effectively even under lockdown due to possible pandemics.</p> <p>To mitigate the risks of cyber-attacks on the IT infrastructure, the Company adopted a cyber threat monitoring and prevention solution in 2022, which integrates both XDR functions and next-generation anti-malware protection, extending coverage to systems excluded from the previous solution. The monitoring and operational management of the new solution is entrusted to HWG Sababa, which supports Tessellis in its security posture improvement activities. A Cybersecurity Operation team was set up in 2023 with the aim of actively monitoring the company's security posture, identifying any vulnerabilities and putting in place appropriate remediation and/or mitigation measures. With the support of HWG Sababa, a specialized platform was also adopted for the security training of all company personnel, to mitigate the risk associated with cyber attack vectors, such as phishing, that leverage the human factor.</p>

**Risk management and mitigation modes: Data Centre**

The core business systems are all highly reliable; in particular, the Data Centre:

- is equipped with security systems such as fire and flood protection;
- makes back-up copies of data, made by the operating personnel, maintained in a different location from the CED, and guarantees a good level of reliability.

In addition, Group companies have specific insurance policies in place to cover damage to their infrastructure.

**Risk Management and Mitigation Arrangements: Infrastructural Measures**

The datacenters in Cagliari and Rome, that host the IT systems, including those obtained from the merger with Linkem Retail S.r.l., are equipped with security systems adequate to the risks faced, from the point of view of physical access, power supply, air conditioning systems, fire prevention measures and anti-flooding measures.

All IT and ICT systems that support the core business are redundant, to limit the impact on operations due to the possible unavailability of individual components. Firewalls, solutions to protect against DDOS attacks, and IPS/IDS (computer intrusion detection and prevention) systems were renewed. In addition, with the OneCompany project, the company invested resources in updating the hardware and software components that support the core business, with the aim of unifying the IT platforms and further increasing their reliability and resilience, thanks also to the decommissioning of some legacy components.

**Supply Chain**

**Risk management and mitigation methods**

Monitoring risks related to possible environmental damage linked to supply chain management by selecting its suppliers on the basis of their technical skills and level of professionalism. The majority of Tessellis' suppliers are of high standing (major players in the telecommunications sector), both from a technical-professional point of view and in terms of the sustainability principles adopted. By maintaining stable and correct relations with these suppliers, the Group reduces the risk in question (see Paragraph "2.8 - Supply Chain").

## 2.7 Directly generated and distributed economic value

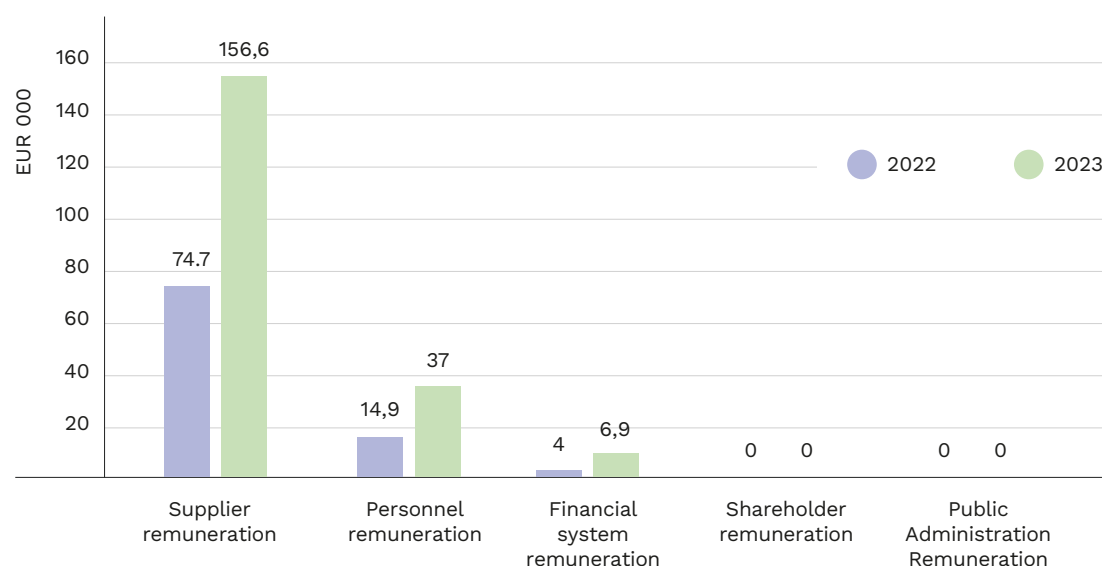
The economic value directly generated by Tessellis in 2023 (net of depreciation and amortization) is EUR 138.7 million. Please refer to the Consolidated Financial Report as of 31 December 2023 for a detailed analysis of the results.

In 2023, the Company distributed EUR 37.0 million to personnel in the form of remuneration for activities carried out during the year, while EUR 156.6 million was allocated to suppliers to cover operating costs arising from the purchase of services, raw materials, consumables and goods; compared to the previous year, both values more than doubled in 2023 compared to 2022. In the form of financial payments, taxes and donations, sponsorships and collaborations, the Company distributed EUR 6.9 million (+65% compared to 2022). In continuity with the previous year, in 2023, no payments were earmarked for either remuneration of the public administration or remuneration of shareholders.

Table 2 – GRI 201-1: Economic value directly generated and distributed (€M)

	2022	2023
	EUR million	EUR million
Supplier remuneration	74.7	156.6
Staff Remuneration	14.9	37
Financial system remuneration	4	6.9
Shareholder Remuneration	0	0
Public Administration Remuneration	0	0
Economic value retained by the Company	-34.7	-61.9
<b>Net value</b>	<b>58.9</b>	<b>138.7</b>

It should be noted that the changes in 2023 in the economic value generated and distributed data compared to the comparative year are, in part, due to the scope of the data, which, for 2022, is limited to economic data from the date of first consolidation, i.e. 1 August 2022.



This value relates to:

- suppliers, through the purchase of goods and services;
- employees, through the payment of salaries and benefits;
- financial system, through interest and commissions on loans granted;
- Public Administration, through tax charges.

The Group therefore did not retain any value, presenting a negative result for the year of approximately EUR 62.2 million.

## 2.8 Supply Chain

In 2023, Tiscali Italia S.p.A.'s suppliers were 1,829, mainly Italian-registered companies focused primarily on the provision of network-related services and infrastructure. In order to guarantee the best possible quality and full satisfaction of customers' expectations, Tiscali requires commitment, reliability and flexibility from its suppliers, establishing long-term relationships with them based on integrity, transparency and objectivity.

The selection criteria used were:

- the best possible purchase on the best possible terms;
- mandatory principles of transparency;
- economic efficiency;
- compliance with regulations in force.

Suppliers of products and/or services that have a direct impact on service quality, Information Security, Business Continuity and Information Technology Service Management, must be qualified through evaluation criteria and hold ISO certifications.

In addition, for supplies with significant environmental aspects, the Group exercises influence by applying controls on the activities provided through the following actions:

- The company has almost total power/competence on the environmental aspect, albeit mediated by the supplier (e.g. subcontractors, companies that carry out technical interventions or maintenance or that carry out works at the company site);
- The company has the possibility of allowing or encouraging suppliers to adopt environmentally correct choices or behavior (e.g. through supply specifications/contracts, requiring suppliers to obtain environmental certifications, choosing eco-sustainable or low environmental impact products);
- The company has the possibility of directing suppliers to behave correctly (e.g. through the delivery of Instructions or Procedures);

→ The company has the possibility of making suppliers aware of and informing them about environmental aspects (e.g. delivery of special information for suppliers).

In the area of supplier management, Tiscali Italia S.p.A. has implemented a new supplier assessment process based on reliable criteria, including sustainability, in order to improve supplier management.

A supplier wishing to cooperate with Tiscali must register on the “Supplier Portal”. Registration requires potential suppliers to enter the information necessary for their identification as economic entities and the documentation certifying their technical and professional suitability, as well as the technical characteristics needed to operate with the company.

Once registered, suppliers can access their reserved area in the Suppliers Portal to complete the qualification process by entering the required documentation.

The assessment of the suitability of potential suppliers is based on their economic-financial soundness, their technical-operational organization and the rules of engagement envisaged for the product classes for which the supplier has applied.

With this initiative, the Group has agreed to ensure that suppliers comply with Tiscali Italia’s sustainability requirements, through a system of verification of their ability and reliability in supplying products/services that comply with contractual requirements and control of the environmental aspects and impacts associated with their activities.

Table 3 – Breakdown of total annual expenditure by item

2023		
Commodity item	No. of suppliers per item	Value of total annual expenditure per item [EUR].
Network Infrastructure	13	183,584,987.31
Investments	72	10,565,653.18
Sales Partners	1,242	20,744,769.97
Marketing, Sales, Distribution	174	7,435,310.18
Leasing	17	2,530,328.74
Other network services	26	2,857,935.66
Professional Services	84	7,740,681.46
Rent and Utilities	50	4,081,768.77
Maintenance	32	3,810,847.63
Other	119	4,901,964.51
<b>Overall total</b>	<b>1,829</b>	<b>248,254,247.41</b>

As indicated, a significant portion of expenditure is incurred for the item “Network infrastructure” and, specifically, towards Opnet S.p.A, which is the main supplier of Tiscali Italia S.p.A., followed by TIM, Open Fiber and Fastweb.

In particular, in the professional services item, following some professional business choices, the number of suppliers decreased, rationalizing spending accordingly.

In relation to the geographical distribution of suppliers, it can be stated that Tiscali operates substantially with national suppliers (97%) and with a portion of local suppliers<sup>5</sup> (1%), serviced with reference to the needs of the Cagliari office.

Table 4 – GRI 204-1: Composition of total annual expenditure by region

Country/geographical area of origin	2022		2023	
	Annual expenditure per country (EUR)	%	Annual expenditure per country (EUR)	%
Abroad	5,239,238.0	2.0%	4,419,481.1	1.8%
Italy	229,499,404.0	87.9%	240,542,246.4	96.9%
of which Sardinia	26,285,525.0	10.1%	4,419,481.1	1.3%
<b>Overall total</b>	<b>261,024,167.0</b>	<b>100.0%</b>	<b>248,254,247.4</b>	<b>100.0%</b>

The significant variance in the value of the annual expenditure to suppliers located in Sardinia compared to 2022 is mainly due to the Group’s decision to internalize the activities of three local suppliers that significantly determined the value of the annual expenditure, amounting to over EUR 22,525,506.

<sup>5</sup> The term local refers to suppliers from Sardinia.

## 3. Technological Innovation

### 3.1 Expansion of network coverage and product accessibility

#### Network coverage and marketing and communication activities

In terms of strategy, during 2023 Tessellis focused on the development of the Ultrabroadband market, whose coverage in the country is constantly expanding, and on the Mobile market.

Coverage at the end of December is spread across the different fixed network technologies, in particular:

- FTTH optical fiber, reaching around 12 million households and local businesses, with speeds of up to 2.5 Gbps in the A&B and C&D (for companies) areas via the Open Fiber network, and on the TIM network (with the switch to 2.5 Gbps from November).
- FTTC connections, covering around 28 million households and local businesses, offering speeds of up to 200 Mbps.
- FWA (Fixed Wireless Access) with speeds via the Opnet network, reaching around 24 million households and local businesses. This access is possible thanks to more than 3,300 radio base stations (BTS), serving more than 3,700 municipalities. As of July 2023, the network upgrade to 5G is underway, enabling speeds of 300 Mbps, with a total of around 6 million households covered by the end of December 2023.

The presence of the different technologies therefore allows the most suitable service to be offered to both consumer and business customers.

Mobile customers increased by 15% from 285,000 as of 31 December 2022 to 328,000 as of 31 December 2023.

**VOUCHER PLAN:** the Voucher Plan constituted a further step towards the completion of solutions aimed at the SoHo and SME market, made possible by the synergy of the new Group thanks to the availability of all Ultrabroadband technologies.

The Voucher Plan for businesses provided a connectivity voucher for ultra-fast internet subscriptions. This was an important opportunity for the digitalization of Italy's production fabric, within the overall framework of the government's actions to relaunch the economy.

The voucher was intended for businesses duly registered in the Register of Enterprises, of micro, small and medium size, as well as natural persons with VAT registration who exercise, on their own or in associated form, an intellectual profession or an unorganized profession.

In relation to the "Connectivity Voucher Plan", Tessellis, after having concluded phase 1 of this measure in November 2021, joined phase 2 of the voucher reserved for businesses on 3 March 2022. Subsequently, in September 2022, Tessellis extended the availability of the business voucher also to the type intended for connections of up to 2.5 Gigabit/s, with the possibility of using the EUR 2,500 contribution.

As of July 2023, the availability of the business voucher was further extended to include FWA technology offers in the different speed profiles with EUR 300 and EUR 500 vouchers.

## Activities in the Business Services to Public Administration sector

### Industrial and Artisan Areas

In 2023, activities continued as part of the strategic partnership between Tiscali Italia S.p.A. and FibreConnect S.p.A., aimed at developing the Ultrabroadband market in selected artisanal industrial areas, which envisages Tiscali Italia's commercial participation in the project to build the FTTH infrastructure. The network will cover, with fiber-optic technology, selected industrial and artisanal areas (AIA) and will make it possible to offer, through this infrastructure, a high-performance, highly reliable and highly available service, enabling local businesses to participate in the fourth industrial revolution.

### The "Scuola 4.0" Plan

The Tessellis Group has further developed its commitment to support Italian schools with solutions for new learning environments, according to the Scuola 4.0 guidelines adopted by the Ministry of Education. Thanks to an allocation within the PNRR funds, the Scuola 4.0 Plan constituted an extraordinary opportunity for innovation for all schools in the first and second cycle and aimed at the digital transformation of Italian schools.

In this context, a partnership was developed with edulia Treccani Scuola and other entities operating in the sector that develop tools and content for the school world.

### Video Analysis for Business and Local Public Administration

As of the second half of 2023, Tessellis has started marketing its HighView service, the intelligent video analysis service, which enables it to: process live or recorded images, produce statistics and business intelligence insights, and detect threats in real time, ensuring immediate responses to dangerous situations for people, assets and infrastructure.

### Digital Agriculture

In 2023, Tessellis continued the incubation phase of the suite of services for digital agriculture with the aim of being ready to face the market challenges that will open up in 2024, thanks also to the incentives linked to the PNRR.

The company, in fact, proposes itself as a support for agricultural enterprises to design together a digital transition process of the territory, through the use of the Linkem 4Farm solution.

### IPCEI

In December, Tiscali was selected as part of the European IPCEI-CIS Project and will play a leading role in the development of Multimodal Generative Artificial Intelligence with its Villanova Project. IPCEIs - an acronym for Major Projects of Common European Interest - are strategic transnational industrial collaboration projects designed to bring together knowledge, skills, financial resources and economic actors from across the European Union.

IPCEI-CIS focuses on the development of Europe's first interoperable and freely accessible data processing ecosystem. We are talking about the multi-provider cloud-to-edge continuum. The aim is to promote the creation of an interconnected infrastructure that synergistically integrates providers and technologies, with a view to building an ecosystem for scalable and efficient data processing, management and usage. This approach will simplify the development of cutting-edge solutions and democratize access to advanced artificial intelligence technologies, making them accessible even to small businesses with limited resources.



## 4. Customers

### 4.1 Responsible sales and marketing

Satisfying customers' needs is a key element of Tessellis' strategy and a founding value of its operations.

For Tessellis, "Customer Centricity" means placing the customer at the core of the value chain, directing every action and decision towards them, responding quickly to their service requests and anticipating their needs and desires in an innovative and proactive manner.

Providing citizens with fast and quality connectivity services, as well as developing solutions that meet the specific needs of each customer, innovative and secure, are priority elements in the Group's strategy.

#### Charter of Services

Tiscali, with the aim of increasing the transparency and quality of the services offered, through the Charter of Services provides its customers with useful information for submitting reports, proposals, requests for clarification and complaints.

The Charter of Services<sup>6</sup> intends to simplify and make more direct the relationship with customers, it sets out the principles of conduct and the commitments undertaken by Tiscali regarding the quality of the services offered, also providing indications regarding the improvement of quality standards and contact channels available to customers.

The Charter of Services must be read in conjunction with the contractual conditions of the individual services and is available on the Company's website at <http://info.tiscali.it/cartaservizi>. The Charter is periodically updated.

#### Innovative, competitive commercial offer aimed at reducing the digital divide in Italy

Tessellis has chosen a "value for money" positioning: for the same price, it offers more than competing operators, or the same service at a lower price than competitors.

This strategic orientation characterizes the fixed-line and mobile telco services.

In the Ultrabroadband market, strengthened by the merger with Linkem, it can offer the best connection everywhere at the same price for everyone, regardless of geographic area.

#### Fair and transparent advertising information

All the company's communication campaigns are screened in advance by the Legal Affairs Department, which verifies their compliance with the relevant regulations and self-regulatory codes. The assessment takes place on an ongoing basis and the effectiveness of the process is demonstrated by the positive results obtained. Each advertising message is subjected to a preliminary assessment that involves, among other things, verifying the absence of misleading or deceptive terms.

<sup>6</sup> Drawn up in accordance with the outline of the Directive of the President of the Council of Ministers of 27 January 1994 and in accordance with the directives set out in Resolution no. 179/03/CSP, 254/04/CSP, 131/06/CSP and 244/08/CSP of the Communications Guarantee Authority. Last Update of the Charter of Services: 10 June 2019.

## 4.2 Customer satisfaction

In 2023, Tiscali's service quality control activities and the growth and consolidation of Customer Satisfaction have been given high priority. Customer Satisfaction results are subject to constant monitoring and are shared weekly with Customer Care operational managers and with the top management of all other functions. Sharing the results is one of the tools available to those working in Customer Care to confirm the importance of their work in handling customer requests with quality.

Therefore, any Customer Satisfaction findings that are not in line with the expected standards are always subject to verification in order to intervene in a targeted manner on procedures or processes, as well as on the training of operators and their behavior.

The Customer Satisfaction monitoring system measures customer satisfaction specifically according to the contact channel used for reporting. The main indicators surveyed are courtesy and competence.

The results of the surveys in recent years have shown a certain degree of customer satisfaction in receiving assistance using alternative channels to the telephone. These include chat and the reserved area.

The annual trend confirmed the maintenance of the main Customer Satisfaction KPIs, despite the reorganization of Customer Care and the ongoing technology change operations on the customer base:

→ Satisfaction in terms of courtesy: 96%

→ Competence: 90%

The objectives for 2024 include continuing to focus on the path, already started in past years, of building a stronger relationship with its customers.

To this end, operational management teams have been set up to work alongside operators and team leaders on a daily basis for continuous improvement.

Tiscali Italia S.p.A. announces that on 20 September 2023 it has adhered to the "Code of Conduct for call center activities" approved by the Authority for Communications Guarantees. The Code was drawn up as part of the working table set up by Agcom in order to ensure the correct application of regulations on telemarketing and teleselling and to meet the need for a wider dissemination of consumer protection principles. At present, Tiscali Italia does not carry out telemarketing and teleselling activities through third parties, but the Company, in line with the position of transparency that has always distinguished it, has deemed it its duty to subscribe to this code, sharing its spirit, with a view to the usual collaboration with the Authorities.

## 4.3 Customer data protection and the European Privacy Regulation

Tessellis S.p.A. (hereinafter also referred to as "Tessellis" or "Group") carries out continuous action on its processes to ensure the protection of customers' personal data. Attentive to the processing of the data and information of customers, employees and all interested parties, the Group has implemented all the necessary protection mechanisms and activities to comply with mandatory requirements and voluntary standards.

The extraordinary merger deed, finalized on 1 August 2022, entailed, among other things, the takeover of Tiscali Italia S.p.A. in the ownership of all the activities included in Linkem S.p.A.'s retail unit, including the processing of personal data of active customers as of 31 July 2022.

The Group has also set up the use of the management software “GoPrivacy” for the fulfilments related to the keeping of Data Processing Registers pursuant to Article no. 30 of the EU General Regulation no. 679/2016 and the Risk Analysis.

With respect to its suppliers and business partners, Tessellis updates their contracts, intervening, in the event of their appointment as Data Processors, on the verification processes of their privacy system.

Tessellis also prepares, on a scheduled basis, company training plans on personal data processing.

With regard to the extraordinary operation, Tessellis started an internal analysis aimed at a complete mixing of the databases that were previously in the ownership of Linkem S.p.A. within its own systems. In consideration of the appointment of the new Data Protection Officer (hereinafter also referred to as “DPO”), a due diligence & Gap Analysis activity has been started by the same DPO, aimed at updating and adjusting the privacy organizational model of Tiscali Italia S.p.A. involving the different relevant areas and corporate functions. Training on the processing of personal data has also been planned for Dealers and the staff of Tiscali Italia S.p.A., in particular, the staff responsible for handling requests from interested parties.

Moreover, in order to guarantee its customers the maximum reliability of its data security, protection and storage system, the Group has voluntarily submitted to ISO 9001, ISO 27001 and extensions ISO 27017, ISO 27018, ISO 22301 and ISO 20000-1 certifications.

For further details on these certifications, please refer to Paragraph “2.4 – Voluntary standards: the certification policy”.

### **Relations with the Data Protection Authority**

At the national level, the Group is subject to regulation and control by the Italian Data Protection Authority, which intervenes in all sectors, public and private, in which it is necessary to ensure the proper processing of data and respect for the fundamental rights of individuals in relation to the use of personal information.

Reports or requests to exercise the rights of interested parties should be addressed, as indicated in the privacy policy published on the site [www.tiscali.it](http://www.tiscali.it), to the dedicated privacy e-mail or, by mail, to Tiscali Italia S.p.A., Loc. Sa Illetta, km 2.300 Cagliari 09123 – Ufficio Privacy.

The company is committed to responding to reports made by interested parties and responds to any remarks made by the Data Protection Authority itself. Reports or requests to exercise the rights of interested parties should be addressed, as indicated in the privacy policy published on the website [www.tiscali.it](http://www.tiscali.it), to the dedicated privacy e-mail or, by mail, to Tiscali Italia S.p.A., Loc. Sa Illetta, km 2.300 Cagliari 09123 – Ufficio Privacy.

Finally, it should be noted that during 2023 there were no episodes of leakage, theft or loss of customer data.

## 4.4 Assistance Channels

Tiscali has developed two Self-Care tools, making them available to the entire Customer Base: MyTiscali for active Customers with fixed and mobile technology; and MyLinkem for active Customers with FWA technology. These are areas reserved for the Customer that allow access to assistance independently and easily. In addition to the assistance portals on the official websites, the Reserved Area, which can be used through the website and APP, remains the main tool with which Customers can manage their subscriptions:

- subscribing to additional services;
- requesting changes to one’s own data and services, such as password changes and relocation by way of non-limiting example;
- viewing and paying one’s invoices online. In addition, new features have been introduced this year that allow users to independently create a service request and monitor the processing status of the open file, without the need to contact support.

The two portals complement the classic telephone support and digital channels such as WhatsApp, Chatbot and VoiceBot. Below is a detailed description of the main support channels:

<p><b>Telephone Support</b></p>	<p>The Customer Care structure is divided into assistance for mobile and fixed network services. Fixed-network assistance remains organized into technical and commercial assistance sectors, operating 7/7 to support residential (consumer) and corporate (business) customers. Customer care is carried out exclusively by the proprietary Customer Care. In the course of 2024 the technological competences of the 3 Customer Care locations will be standardized in order to optimize the responses to the customer.</p>
<p><b>Digital Channel Support</b></p>	<p>With the aim of offering the customer greater timeliness and autonomy in handling the simplest requests during 2024, two assistance channels will be further improved: the VoiceBot and the Chatbot. Systems based on artificial intelligence that, by interpreting natural language, can provide timely answers to requests made by customers.</p>

Lastly, it should be noted that in designing its offers, Tiscali constantly consults the world of associations, which act as spokespersons for customers’ needs.

The company maintains relations with Consumer Associations and when necessary responds promptly and transparently to reports forwarded by them.

Tiscali Italia S.p.A., moreover, is often cited by Associations and sector Authorities for its virtuous behavior and practices of fairness and transparency towards its customers.

## 5. The People

Tessellis considers its employees to be a fundamental element of its identity: people play a central role in the Group's development and in carrying out its business activities.

Tessellis is constantly committed to ensuring respect for workers' rights, through their full valorization, development and professional growth in a difficult employment context. Similarly, Tiscali is always attentive to issues relating to the health and safety of its employees through training initiatives on safety and the development of risk awareness.

In order to foster the success of the business and increase the sense of belonging to the Group, employees are also personally involved in the corporate culture, so that they feel part of it and share the same values.



### 5.1 Corporate restructuring and safeguarding employment

Tiscali Italia S.p.A. has given continuity to the actions aimed at operating a policy of optimization and management of labour costs that is non-traumatic with respect to employment levels, welfare and the motivation of people, also with reference to the socio-economic contexts within which the various production sites are located. This assumption represents a fixed point in the vision of the company's top management guiding all the management choices supporting the industrial plan.

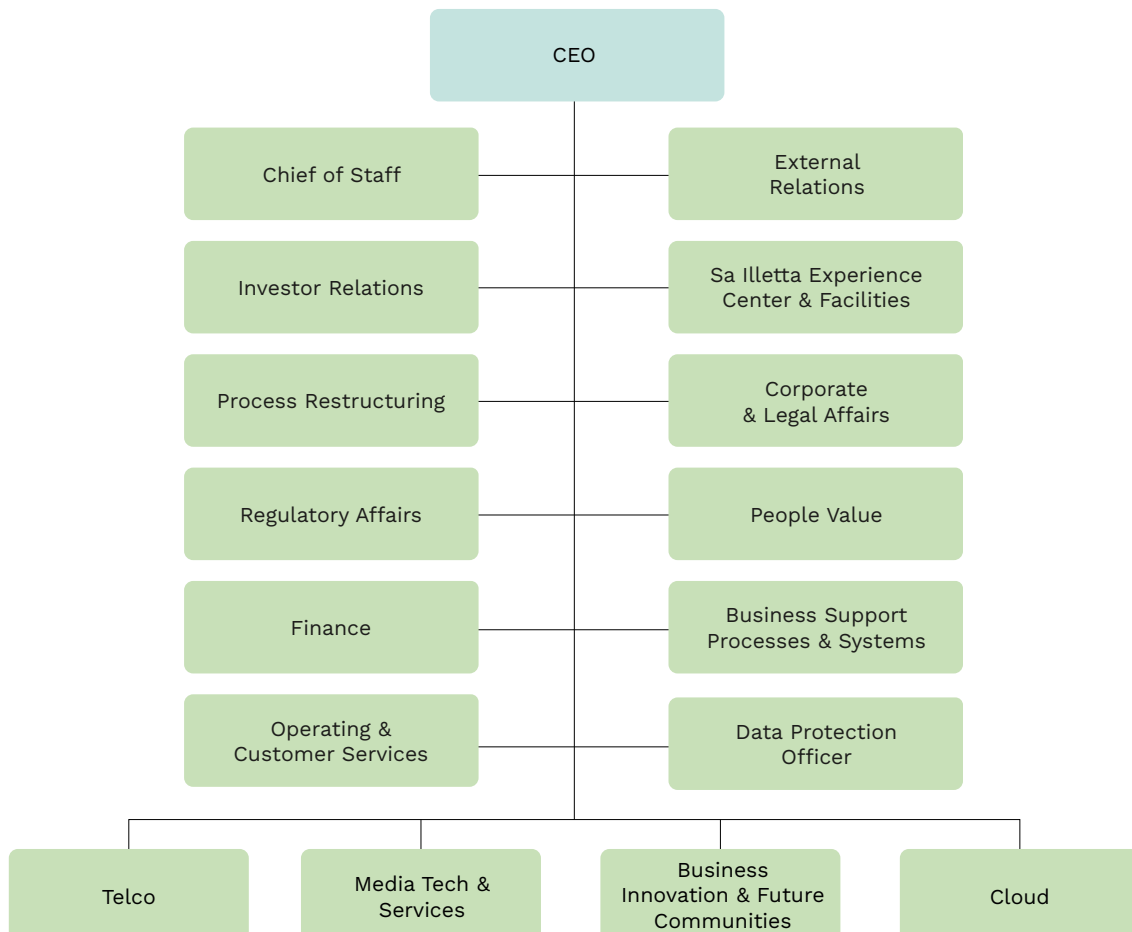
In particular, two organizational choices that the Company has made in succession should be mentioned:

- confirming an organizational model following the merger that minimized the assessment of redundancies: the organizational design had in fact the mandate to absorb and optimize resources within the functional scope;
- entering into an agreement with the trade unions for voluntary redundancy incentives (mobility with non-opposition pursuant to Law no. 223/91), which also provided for access to the institute of the Monthly Unemployment Indemnity (NASPI). The Plan, from September to December 2023, led to the exit of 30 units.

Consistent with this vision, the Group has adopted an organizational model that includes, on the one hand, the traditional management of the telecommunications business, and on the other, the development of organizational units whose mission is to seize all opportunities for the development of innovative businesses, complementary to the traditional voice and data access services, through the synergic valorization of the network infrastructure, domains and platforms in use by the two companies.

The central role of Customer Services, whose activities are carried out entirely in-house, is also reaffirmed, while the Staff Departments are assigned the task of overseeing all the key transversal processes for the implementation and consolidation of the new organizational culture, with a view to One Company.

Photo 1 - Representation of the Tessellis macro-organizational model



## 5.2 Diversity & Inclusion

Tessellis believes that diversity and plurality are values that contribute to creating an open and stimulating work environment, and to ensuring perspectives and points of view that foster innovative ideas and effective and correct behavior. Therefore, it has developed an organizational framework that supports the inclusion and enhancement of diversity. Tessellis guarantees equal dignity and opportunities to all people regardless of their country of origin, culture and religion, gender, sexual orientation, political opinions and any other personal characteristic and style. Tessellis is therefore committed on a daily basis to:

- disseminating a culture of diversity and equal opportunities among employees and collaborators, ensuring that everyone is treated, at all times, with dignity, respect and fairness, demonstrating behavior that is inclusive and upholds the Group's values;
- creating a welcoming work environment, free from any direct or indirect discrimination and any kind of harmful behavior based on personal, social, political and cultural diversity;
- applying specific HR policies and metrics to ensure fairness throughout the employer-employee relationship, from the people selection process to the assignment of roles, from performance appraisal to professional development, from compensation to termination of employment;
- supporting the development and professional growth of its human resources, inspiring employees to reach their full potential and ensuring that best practices are shared throughout the organization.

This is the context for the “Rigenerati dal lavoro – Regenerated by Work” project, an inclusion initiative aimed at offering job opportunities to people in prison institutions, giving them a purpose to better cope with a difficult time in their lives, through real work, giving them visibility and dignity so that they also have the opportunity to be reintegrated through the professionalism acquired once they are returned to civil society. Tessellis has set up three workshops in which the process of regenerating modems to be reintroduced into the market of new customer acquisitions is imported. Tiscali currently has three Laboratories, Casa Circondariale di Lecce, Casa Circondariale di Rebibbia and Casa Circondariale di UTA – Cagliari, where a total of 19 employees are employed on fixed-term contracts plus two people in training at the Rebibbia Institute.



The workshop and new colleagues at the UTA prison.

It is also worth noting that two resources, once they had regained their freedom, were hired on permanent contracts at the Rome office, and in November 2023, a new colleague joined the company on a one-year fixed-term contract, as part of the reintegration project.

### 5.3 Staff composition and equal opportunities

Tessellis considers people as a wealth of skills, experience and talents to be enhanced and strengthened. The new company, resulting from the merger of 1 August 2022, has now gone beyond the regional dimension typical of the previous set-up, taking on a national configuration, given the importance in terms of consistency and numerical distribution of the offices in Bari, Taranto and Rome, in addition to Cagliari. The integration of different experiences and cultural backgrounds within the new organisational model represents one of the main challenges for the 2023-2024 two-year period. Within this framework, the People Value Department maintains the objective of contributing to the implementation of the One Company model, favoring the construction of a new corporate culture that offers each resource the opportunity to develop their skills, in line with the needs induced by the evolution of the business in a context in which people, with the complex of their internal and external interactions, are the main engine for generating value and social enrichment.

Being an agent of change for People Value means starting out on a path that has as its time frame the 2022-2024 three-year period in order to complete the following goals:

- definition of the new organisational model;
- definition of corporate values and the managerial model;
- redesign of the internal communication process with a focus on the development of a new corporate intranet;
- implementation of a development model based on job posting and performance management tools.
- With respect to this path, three initiatives should be mentioned that in 2023 contributed substantially to the progress towards the stated goals:
  - the formalization, dissemination and promotion of the new Managerial Model, which summarizes the organization's values, principles and competencies from a functional perspective in view of the transformations it is undergoing and which represents not only a key orientation tool towards a shared organisational culture, but also a fundamental reference framework for all People Value management tools and initiatives;
  - the design and launch of the new performance management system, which was created not only to support the achievement of business objectives but above all to
    - supporting integration through the promotion of a **consistent corporate culture**;
    - **orient individual behavior** in line with the new managerial model;



- making the **leaders protagonists** of the company integration process and of their people's growth;
- harmonizing managerial styles by promoting a **culture of listening and feedback**.

Il lancio dell'iniziativa è stato per questo accompagnato da una capillare azione formativa che ha coinvolto tutti i valutatori;

- the systematic use of internal job posting for the management of almost all corporate organisational needs. This approach has had the following aims:
  - **getting** to know the professional skills and talents of our people;
  - **enhancing**, where possible and in terms of professional development, the assets of internal resources, as a means of engagement and retention;
  - **integrating** different backgrounds in heterogeneous and multi-territorial teams;
  - **optimizing** staff costs.

The internal job posting tool has indeed enabled the management of 58 organisational needs in 2023, for which 371 people were interviewed.

Looking at the overall sustainability of the Group, Tessellis renews its commitment to creating the best conditions for a collaborative and motivating work environment, capable of grasping the needs of each individual and enhancing the different professional profiles. As of 31 December 2023, the Group had a total workforce of 1,054 employees spread across five locations.

The Group also relies on the collaboration of non-employee workers who also participate in the development of the business, amounting to 15 figures as of 31 December 2023, divided mainly into trainees, external staff and self-employed workers.

Total number of employees broken down by location				
Sede	Units		Units	
	as of 31 December 2022		as of 31 December 2023	
Seregno - 3P Italia	7		7	
Cagliari	626		576	
Bari	248		232	
Taranto	166		145	
Lecce – Prison	0		8	
Rome	85		79	
Rome – Prison	0		4	
Milan	5		3	
<b>Total</b>	<b>1,137</b>		<b>1,054</b>	

Following a process of continuous improvement, the total number of employees in 2022 was restated in order to include 3P Italia S.p.A. in the reporting scope. For previously published data, please refer to the 2022 Non-Financial Statement, available at [www.tessellis.it](http://www.tessellis.it).

The Group's deep-rooted presence in the territory of Sardinia (55%), and similarly in the South of the country (92%) is clearly visible. It should also be noted that, as of 31 December 2023, the Group's total workforce had decreased by 7.3%; this reduction is mainly attributable to the implementation of the early retirement policy.

**Table 5 – GRI 2-7: Breakdown of personnel by contract type and gender.**

Type of contract	As of 31 December 2022			As of 31 December 2023		
	men	women	total	men	women	total
Fixed-term contract	22	4	<b>26</b>	15	5	<b>20</b>
Open-ended contract	481	630	<b>1,111</b>	439	595	<b>1,034</b>
<b>Total</b>	<b>503</b>	<b>634</b>	<b>1,137</b>	<b>454</b>	<b>600</b>	<b>1,054</b>

Following a process of continuous improvement, the total number of employees broken down by type of contract and gender for 2022 was restated to include 3P Italia S.p.A. in the reporting scope. For previously published data, please refer to the 2022 Non-Financial Statement, available at [www.tessellis.it](http://www.tessellis.it).

The figures in the table confirm the substantial majority of open-ended contracts (98%) in the total company population. In 2023 and 2022, **no employees are hired on non-guaranteed hourly contracts**, such as on-call or job-on-call contracts. Out of respect for its people and their importance to the company’s success, the Group does not resort to employment contracts through which it utilizes the work of its employees “as needed”. All employees are guaranteed a fixed number of working hours per day, week or month.

**Table 6 – GRI 2-7: Breakdown of personnel by professional type (part-time/full-time) and gender**

Type of contract	As of 31 December 2022			As of 31 December 2023		
	men	women	total	men	women	total
Full-time	379	288	<b>667</b>	351	303	<b>654</b>
Part-time	124	346	<b>470</b>	103	297	<b>400</b>
<b>Total</b>	<b>503</b>	<b>634</b>	<b>1,137</b>	<b>454</b>	<b>600</b>	<b>1,054</b>

Following a process of continuous improvement, the total number of employees broken down by professional type and gender in 2022 was restated to include 3P Italia S.p.A. in the reporting scope. For previously published data, please refer to the 2022 Non-Financial Statement, available at [www.tessellis.it](http://www.tessellis.it).

Thirty-eight per cent of workers (i.e. 400 units) use a part-time contract. The significant percentage in the use of this type of employment relationship responds to the many organisational needs associated with shift work schedules in the customer care sector, as well as the work-life balance needs typical of many families.

**Table 7 – GRI 405-1: Breakdown of personnel by professional category and gender**

Tipologia professionale	As of 31 December 2022			As of 31 December 2023		
	men	women	total	men	women	total
Manager	19	4	<b>23</b>	21	5	<b>26</b>
Middle-manager	40	19	<b>59</b>	36	17	<b>53</b>
Employee	425	608	<b>1,033</b>	382	573	<b>955</b>
Worker	19	3	<b>22</b>	15	5	<b>20</b>
<b>Total</b>	<b>503</b>	<b>634</b>	<b>1,137</b>	<b>454</b>	<b>600</b>	<b>1,054</b>

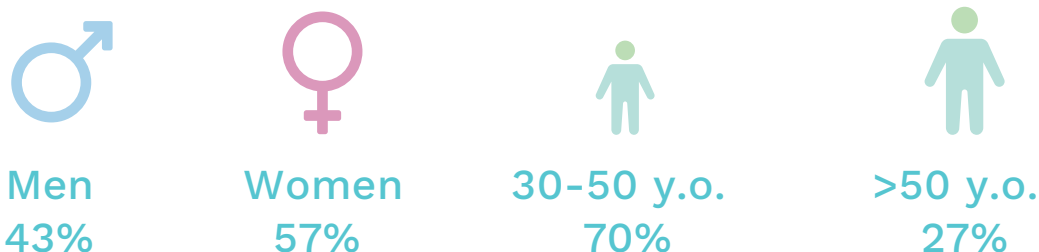
Following a process of continuous improvement, the total number of employees broken down by professional category and gender for 2022 has been restated in order to include 3P Italia S.p.A. in the reporting scope. For previously published data, please refer to the 2022 Non-Financial Statement, available at [www.tessellis.it](http://www.tessellis.it).

**Table 8 – GRI 405-1: Breakdown of personnel by professional category and age group**

Number of persons	As of 31 December 2022				As of 31 December 2023			
	<30	30–50	>50	total	<30	30–50	>50	total
Manager	0	9	14	<b>23</b>	0	7	19	<b>26</b>
Middle-manager	0	21	38	<b>59</b>	0	16	37	<b>53</b>
Employee	45	808	180	<b>1,033</b>	27	705	223	<b>955</b>
Worker	4	16	2	<b>22</b>	3	14	3	<b>20</b>
<b>Total</b>	<b>49</b>	<b>854</b>	<b>234</b>	<b>1,137</b>	<b>30</b>	<b>742</b>	<b>282</b>	<b>1,054</b>

Following a process of continuous improvement, the total number of employees broken down by professional category and age group in 2022 was restated in order to include 3P Italia S.p.A. in the reporting boundary. For previously published data, please refer to the 2022 Non-Financial Statement, available at [www.tessellis.it](http://www.tessellis.it).

The majority of the Group's staff is in the 30-50 age bracket (70%), in line with previous years.

**Photo 2 - % composition of the workforce by gender and age group**

**Table 9 – GRI 405-1: Protected categories**

Number of persons	As of 31 December 2022			As of 31 December 2023		
	men	women	total	men	women	total
Manager	0	0	<b>0</b>	0	0	<b>0</b>
Middle-manager	0	0	<b>0</b>	0	0	<b>0</b>
Employee	18	37	<b>55</b>	18	39	<b>57</b>
Worker	0	0	<b>0</b>	0	0	<b>0</b>
<b>Total</b>	<b>18</b>	<b>37</b>	<b>55</b>	<b>18</b>	<b>39</b>	<b>57</b>

**Table 10 – GRI 401-1: Incoming Turnover by Gender and Age Group<sup>7</sup>**

Number of persons	As of 31 December 2022					As of 31 December 2023				
	<30	30–50	>50	total	% rate	<30	30–50	>50	total	% rate
Men	4	23	6	<b>33</b>	<b>6.6%</b>	2	7	0	<b>9</b>	<b>2.0%</b>
Women	5	14	0	<b>19</b>	<b>3.0%</b>	0	6	1	<b>7</b>	<b>1.2%</b>
<b>Total</b>	<b>9</b>	<b>37</b>	<b>6</b>	<b>52</b>	<b>4.6%</b>	<b>2</b>	<b>13</b>	<b>1</b>	<b>16</b>	<b>1.5%</b>

<sup>7</sup> The incoming and outgoing turnover in the following table represents the ratio between the number of new hires (terminations), broken down by gender and age group, during 2023 and the total number of employees as of 31 December 2023 by gender and age group.

Table 11 – GRI 401-1: Outgoing Turnover by Gender and Age Group

Number of persons	As of 31 December 2022					As of 31 December 2023				
	<30	30–50	>50	total	% rate	<30	30–50	>50	total	% rate
Men	1	16	2	19	3.8%	3	40	14	57	12.6%
Women	2	14	1	17	2.7%	2	22	18	42	7.0%
<b>Total</b>	<b>3</b>	<b>30</b>	<b>3</b>	<b>36</b>	<b>3.2%</b>	<b>5</b>	<b>62</b>	<b>32</b>	<b>99</b>	<b>9.4%</b>

The outgoing turnover in 2023 was characterized by a significant quantitative increase over the previous year but also by absolute continuity from a qualitative point of view. Indeed, more than 98% of exits were voluntary (resignations, transfer to other group companies, voluntary redundancies) or linked to the physiological turnover of employees working in the prisons who, at the end of their sentences, must necessarily terminate their existing employment relationship.

The phenomenon of voluntary redundancies has had a resurgence with respect to recent years, also in the light of a labour market made particularly dynamic by the use of remote working, which has made it convenient to offer external jobs that are not tied to actual territorial mobility and, for the Cagliari site, by an increased job offer for technical specialists, the effect of the implementation of regional infrastructure digitization projects related to the PNRR.

### CCNL

Tessellis operates in the telecommunications sector and refers to two collective labour agreements: the CCNL Telecomunicazioni for white-collar workers and middle management and the CCNL Dirigenti Industria for managers. In addition, since Tiscali has a newsroom with 12 journalists, the CCNL Giornalistico is applied to this staff segment. Each employee is represented in one of these categories and is therefore covered by one of the collective labour agreements in accordance with national employment legislation.

In addition to the CCNL of reference, there is second-level bargaining for agreements that may concern the regulation of work shifts, the use of paid leave and the accessibility of other welfare measures or improving people’s well-being.

In addition to the relevant CCNL, two second-level agreements were signed in July between the Company and the Trade Unions, which redefined and expanded the company welfare platform as described in more detail in Paragraph 5.5.



In particular, the signing of a structural agreement on “lavoro agile” flexible working has guaranteed fair access to the scheme for all employees and not only for the clusters defined by the DL Cura Italia and subsequent extensions, while ensuring its organisational sustainability.

The Group is committed to safeguarding employees’ right to freedom of association and collective bargaining. As of 31 December 2023, 100% of employees are covered by collective bargaining agreements. All employees in the Group’s workforce may take parental leave, if the conditions are met, which for women consists of a period of compulsory abstention from work and a period of optional abstention, while for men it is always optional.

Table 12 – GRI 401-3: Parental leave<sup>8</sup>

	As of 31 December 2022			As of 31 December 2023		
	men	women	total	uomini	donne	totale
Total parental leave during the year	16	126	<b>142</b>	25	146	<b>171</b>
of which	As of 31 December 2022			As of 31 December 2023		
Total employees returned to work at the end of parental leave	15	117	<b>132</b>	25	146	<b>171</b>
Total employees on leave on the date indicated	1	9	<b>10</b>	0	1	<b>1</b>
Total employees returned to work at the end of parental leave and still employed 12 months after returning to work	11	129	<b>140</b>	13	121	<b>134</b>
	As of 31 December 2022			As of 31 December 2023		
Return to work rate	100%	100%	<b>100%</b>	92%	94%	<b>94%</b>
Retention rate	73%	102%	<b>99%</b>	88%	96%	<b>95%</b>

Following a process of continuous improvement, the 2022 parental leave data was restated to include 3P Italia S.p.A. in the reporting scope. For previously published data, please refer to the 2022 Non-Financial Statement. For previously published data, please refer to the 2022 Non-Financial Statement, available at [www.tessellis.it](http://www.tessellis.it).

### Equal treatment and remuneration

Tessellis believes that diversity represents an added value for its business; therefore, it categorically rejects any form of discrimination based on gender, sexual orientation, nationality, physical or mental disability, ethnic origin, religious faith, marital status, language or social and economic status, political or trade union opinions. Diversity is not considered as such by the company, which applies the same management tools and policies to all personnel. Interpersonal relations and working relations between colleagues and collaborators, as well as with customers and suppliers, are marked by mutual respect, so as not to offend the dignity of people and not to engage in any kind of physical, verbal or psychological harassment.

Intimidating and mobbing attitudes towards colleagues and collaborators, as well as individual pressures applied to condition the behavior and working activities of individuals or groups of people, are therefore not tolerated by Tessellis.

With the aim of ensuring proper communication and management of any episodes of discrimination, Tessellis has introduced rules of conduct and ad hoc tools.

Tiscali employees are obliged to report any episodes, either to their manager, to the HR function, to a third party body (which may also collect reports from external sources) or directly to the Supervisory Board. The persons or entities involved are responsible for assessing the information received and identifying the appropriate management methods, while the HR function is responsible for ensuring that there are no repercussions of any kind against a person who makes a report in good faith, regardless of whether the report is not followed up after the investigation process. In this regard, it should be noted that during 2023, there were no cases of discrimination based on race, color, gender, religion, political opinion, nationality or social origin, as well as age, disability, sexual orientation and other conditions that may give rise to possible discrimination.

<sup>8</sup> Parental leave refers to compulsory and optional leave. The calculation of the “return to work rate” considers the total number of employees who returned to work after parental leave compared to those who should have returned during the reporting period. The calculation of the retention rate, on the other hand, considers the total number of employees still employed 12 months after returning to work following parental leave compared to the total number of employees who returned to work following parental leave in the previous reporting period.

Furthermore, Tessellis believes that **fair and equal remuneration** for men and women in its workforce is important. For this reason, Tessellis' management and remuneration system is inspired by the principles of meritocracy and transparency; individual performance, managerial skills and professional expertise represent the main drivers that guide remuneration policies.

This assumption is embodied in the definition of two guidelines that standardize the management process, namely:

- Internal resources must be favored for all new professional opportunities over recruiting on the external labour market, which is always seen as a residual and necessary choice;
- All horizontal and vertical mobility processes are managed with the job posting tool in a key of absolute transparency and meritocracy of choices.

In order to ensure pay equity, in 2023 the Group monitored the ratio between the remuneration of the highest paid individual and the median annual remuneration of all employees of the Group's Italian companies. This ratio stands for 2023 at 11.9<sup>a</sup>.

In addition, it is reported that there was no change in the total remuneration package of the Group's highest-paid individual in 2023 compared to 2022; therefore, the calculation of the ratio of the percentage increase in this remuneration to the median percentage increase in total annual employee remuneration is not applicable for the reporting year.

### Attention to people

Tiscali is a promoter of management practices in favor of people: in the Group all regulatory institutes safeguarding maternity, leave and leave aimed at the need to reconcile professional and family life are applied. The Group is committed to safeguarding work-life balance needs, also thanks to contractual flexibility that allows changes from full-time to part-time contracts.

With reference to colleagues with particular forms of disability requiring special protection, by accessing the technological possibilities enabling virtualization of the workstation, during 2019 two employees were allowed on an experimental basis to work directly from their residence for one year.

This protection was also extended for the year 2023. It is also worth reiterating that, despite the fact that the end of the pandemic emergency has been decreed by Covid-19 on 05 May 2023, the company has maintained the possibility of working 100% in flexible mode throughout 2023 for people with frailty requirements, as set out in the Legislative Decree "Cura Italia" and subsequent extensions.

Tiscali has a partnership with Mindwork to offer a psychological e-counseling service to all employees who require support in reconciling work with their psychological well-being.

In addition, on the Campus in Cagliari, there is a nursery that welcomes pre-school-age children of employees of both Tiscali and other companies hosted on the site.

<sup>a</sup> Concerning the calculation of the GRI 2-21 indicator, the salary data for the seven employees on staff ad of 31 December 2023 at 3P Italia S.p.A. were excluded. However, this exclusion is not considered material for the purpose of reporting the indicator.

### The rewarding model

Tiscali pursues the principles of fairness and meritocracy in the management and development of people, from the analysis and assessment of skills, to the definition of rewards, to the identification of career paths and professional development.

In 2023, the company's rewarding model envisaged a process of assigning rewards for individual merit in terms of compensation. Depending on the achievement of corporate objectives, 15 executives had access to the managerial MBO and 36 non-executives had access to the MBO light target-based incentive system, with regulations entirely similar to the so-called managerial MBO provided for executive personnel. For the financial year 2023, the system envisages a single target consisting of the Group EBITDA net company indicator to be achieved at the target of 100% in on/off mode.

This indicator is the same for all beneficiaries of the MBO incentive system as it responds to the logic of maximizing the emphasis on value creation that this indicator summarizes across all corporate functions. There was also a variable remuneration system involving 36 salesmen. This system rewarded the attainment of sales and performance targets, encouraging greater productivity and providing incentives to achieve corporate objectives. In this way, it was intended to strengthen the link between individual and company performance, in order to promote a culture of collaboration and commitment towards achieving the Group's sustainability objectives.

## 5.4 Training

During the year 2023, Tiscali successfully launched its two-year training plan, which was carefully structured in line with the values and competencies framework identified in the company's new management model. The latter was implemented to meet the needs that emerged from the merger with Linkem, focusing on the promotion of a shared organisational culture and the harmonization of managerial styles.

During the first year of the two-year plan, special emphasis was placed on training our managers. In a significant effort to consolidate a cohesive corporate culture, 100 % of managers were involved in at least one training course. This strategic choice was driven by the realization that managers play a key role in transmitting corporate culture and influencing corporate objectives.

The plan aimed to direct training investments in a targeted manner, focusing primarily on people managers. This approach was designed to maximize the impact of training activities by focusing on those people who have the greatest influence on organisational culture and effectiveness in implementing corporate objectives.

The Group has chosen performance management as the main vehicle for training activities. At its launch, all managers were involved in training sessions, creating an environment in which the knowledge and skills acquired could be shared and discussed. This approach was replicated throughout the year, ensuring constant dissemination of training and continuous development of managerial skills.

## Objectives of the training plan


	<h3>Objectives</h3> <ol style="list-style-type: none"> <li>Promoting a shared organisational culture</li> <li>Making managers active participants in the corporate integration process</li> <li>Promoting uniform management styles</li> </ol>		<h3>Population involved</h3> <p>162 participants</p>
	<h3>Methodology</h3> <ol style="list-style-type: none"> <li>FADR (close distance learning)</li> <li>Classroom (workshops)</li> <li>Action Learning (simulation of virtual environments and situations)</li> <li>Testimonials</li> </ol>		<h3>Tools</h3> <ol style="list-style-type: none"> <li>Role dynamics</li> <li>Use of information technology</li> <li>Slide</li> <li>Group discussions</li> </ol>

Table 13 – Types of training courses held in 2023

Course title	Editions	Days	Resources involved	Professional fields
Performance appraisal as a people management tool	8	2	120	All managers excluding TL of the CC
Performance Management and the Role of the TL	6	1	37	All CC TLs

In 2023, **1,833 hours of training** were provided, of which over 69% was for the white-collar category. In terms of average training hours for each professional category, middle managers received the highest number of hours, amounting to 7.5 in 2023 (+63% compared to 2022), a figure that confirms the Group’s strategic decision to increase training for managers.

In particular, training hours more than doubled for women belonging to this category, a result that represents an important confirmation of the investments made in enhancing the value of its people.

Table 14 – GRI 404-1: Average hours of training by professional category and gender.

Average hours of training by professional category and gender	2022			2023		
	men	women	total	men	women	total
Manager	0.8	0.0	<b>0.7</b>	6.5	7.7	<b>6.7</b>
Middle-manager	5.4	2.9	<b>4.6</b>	7.2	8.2	<b>7.5</b>
Employee	1.9	1.9	<b>1.9</b>	1.8	1.0	<b>1.3</b>
Worker	0.0	0.0	<b>0.0</b>	0.0	0.0	<b>0.0</b>
<b>Total</b>	<b>2.1</b>	<b>1.9</b>	<b>2.0</b>	<b>2.4</b>	<b>1.2</b>	<b>1.7</b>



## 5.5 Tiscali's welfare system

Corporate Welfare at Tiscali represents a fundamental pillar of our commitment to the well-being and sustainable development of our employees. New initiatives have been redesigned and implemented in 2023, taking into account the unique characteristics of the company's workforce, resulting from the merger between Tiscali and Linkem. This commitment aims to ensure a working environment that values health, psychophysical wellbeing and the reconciliation of professional and personal life.

### Psychological Support – Mindwork

A psychological support service was introduced in cooperation with Mindwork, a platform specializing in online psychological counselling and support. This service offers employees access to 8 free meetings per year with over 100 qualified psychologists. The platform's flexibility allows appointments to be booked within 24 hours of the request, guaranteeing anonymity and security through encrypted video calls. Tiscali is one of the forerunners of this initiative in Italy, making a concrete contribution to the psychological well-being of its employees.

### Sports Initiative – “Correre per Sempre – Running Forever”

This programme, designed with the collaboration of a federal athletics instructor, promotes running as a simple and accessible sport. Through the dedicated platform, training tables, training and motivational pills are offered, making running an accessible activity for all employees regardless of their level of fitness.

### Interventions in Corporate Welfare

In July, a number of particularly significant agreements were signed between Tiscali and the national trade unions (Slc-CGIL, Fistel-CISL, Uilcom-UIL), present together with the territorial and company representatives, which revised and implemented the already existing corporate welfare package:

- **school placement leave:** 10 hours of paid leave to ensure the placement of the child in nursery and kindergarten, thus supporting parental needs;
- **hourly parental leave:** the possibility to take parental leave on an hourly basis is introduced, providing more flexibility for family needs;
- **personal needs leave:** 1 day of paid leave, which can also be taken on an hourly basis, to meet personal needs, not included in contractual calculations;
- **specialist visit leave:** 8 hours of paid leave per year for specialist medical examinations, clinical analyses and medical treatment, providing support for the health of our employees;
- **temporary part-time and unpaid leave:** temporary part-time and unpaid leave may be requested to manage personal needs, promoting work flexibility;
- **financial contribution for goods and services:** a welfare credit is made available to employees for the purchase of goods and services through a dedicated platform, promoting conscious choices;

- **structural remote working:** the possibility of working remotely two days a week or cumulatively within the reference month is introduced. Arrangements are established according to organisational needs, ensuring fairness and flexibility for all employees.

In addition to what has been described in the previous points, Tiscali’s welfare covers assistance, health and pension initiatives. Tiscali has taken out insurance policies to cover non-occupational risk for all employees.

#### Advances on severance pay

Tessellis allows the advance on severance pay to be used for the purchase and renovation of a first home (for the employee himself or for his children) and for extraordinary medical expenses, subject to the legal requirements for accessing it.

#### Policies

The death, permanent disability and accident policy was introduced in 2012 and covers 44 employees, including executives and managers.

#### FASI Fund

The FASI (Fondo Assistenza Sanitaria Integrativa – Supplementary Healthcare Fund) provides executives, who are voluntarily enrolled, and their families with supplementary benefits to the assistance provided by the National Health Service, either directly, on the basis of administrative agreements with healthcare facilities that agree with the FASI on favourable economic conditions compared to those normally applied.

#### Unisalute Policy

The Unisalute health policy was introduced in 2009 and is a form of health care supplement to the National Health Service. It is joined by 828 employees, including white collar and middle management.

#### Pension plans

With reference to the pension plan, in accordance with the CCNL, employees pay contributions monthly to the State Treasury managed by INPS, or they can join (even partially) the category fund (Telemaco).

As provided for by the relevant regulations, if the employee (office worker or middle manager) joins the Telemaco category fund and pays, in addition to the severance pay, an additional contribution (minimum of 1%), the company in turn pays a fixed contribution of 1.2% on the remuneration used to determine the severance pay. Executives, on the other hand, join the Previndai Fund, with a minimum contribution of 4% to which the company adds a fixed contribution of 4% on the salary used to determine the severance pay.

## 5.6 The health and safety of workers

Tessellis pays the utmost attention to the issue of safety at work, seeking management solutions suitable for reducing the risk of accidents in the company and providing safe locations for both its employees and external suppliers operating at Tiscali sites.

The activities of Tiscali Italia S.p.A. are conducted in full compliance with current legislation and company directives on health and safety through prevention and protection. In 2023, the Company implemented all fulfilments relating to the prevention of health and safety risks in the workplace, as provided for by Legislative Decree no. 81/2008. In particular, the risk assessment document consists of a general part and a specific part for each of the Cagliari Sa Illetta, Bari, Taranto, Rome and Milan sites.

All initiatives were promoted with regard to training programmes on occupational health and safety prevention issues.

In addition, the role of the Company's Prevention and Protection Service was strengthened by creating a specific sector in the organization chart with expertise in this area and by increasing the number of employees in the Service, with the identification of a resource dedicated exclusively to occupational health and safety issues.

The supervision of issues relating to safety, health and risk prevention in the workplace environment is entrusted to:

- the Head of the company's Prevention and Protection Service;
- the Occupational Physician.

Worker participation, consultation and communication on occupational health issues is routinely carried out through the qualified representatives of the Workers' Safety Representatives (RLS), in close relation with Human Resources, the Occupational Physician and the Head of the Company Prevention and Protection Service.

Within the framework of health protection prevention services against specific risks related to professional duties, the Company has followed up both the programme of periodic surveillance visits, and visits requested on the initiative of individual workers, to verify the full existence of the capacity to work.

In addition, Tiscali Italia S.p.A. workers are subject to health surveillance (Legislative Decree no. 81/08 art. 176) for the systematic use of equipment equipped with video terminals. The health protocol provides for examinations usually every five years for workers under 50 years of age, and every two years for workers over 50 years of age or who have been found fit with prescriptions. The health data, concerning the individual worker, are protected by privacy and therefore accessible only by the Occupational Physician, who is however obliged to provide the collective anonymous results to the employer, the RSPP and the RLS (Workers' Safety Representative) during the annual periodic meeting (Legislative Decree no. 81/08 Article no. 35, paragraph 1, letter i). In general, at Tiscali, there are no employees involved in work activities with a high rate or risk of specific diseases.

Table 15 – GRI 403-9: Occupational Accidents of Employees<sup>10</sup>

Accidents at work of employees	2022	2023
Total number of deaths due to occupational accidents	0	0
Total number of serious accidents at work (excluding fatalities)	0	0
Total number of recordable occupational accidents	6	3
of which at the workplace	0	0
of which en route	6	3
Accident indices	2022	2023
Hours worked	860,332	1,460,513
Multiplier for calculation	200,000	200,000
Rate of deaths due to occupational accidents	0.00	0.00
Rate of serious accidents at work (excluding fatalities)	0.00	0.00
Recordable work accident rate	1.39	0.41

Following a process of continuous improvement, the total hours worked in 2022 have been restated in order to report the hours worked at Tiscali Italia S.p.A., 3P Italia S.p.A. For previously published data, please refer to the 2022 Non-Financial Statement, available at [www.tessellis.it](http://www.tessellis.it).

Historically, accidents at work have been recorded as “en route” accidents, i.e. when travelling between home and work or vice versa. This again confirms that the health and safety practices implemented within Tiscali are valid and effective in preventing accidents at operating sites attributable to failures in worker safety protection attributable to the practices and procedures in place.

With regard to occupational diseases, it should be noted that no cases occurred in the company during 2023.

In addition, it should be noted that non-employee workers who may be present at the Company’s premises, such as trainees, external staff and self-employed workers, were also taken into account. In this regard, it should be noted that no cases of occupational accidents occurred for the 2022-2023 two-year period.

<sup>10</sup> Accident indices are calculated exclusively for employees using the following methodology:  
 - rate of deaths resulting from accidents at work: number of deaths resulting from accidents at work/number of hours worked \* 200,000;  
 - rate of accidents at work with serious consequences (excluding deaths): number of accidents at work with serious consequences (excluding deaths)/number of hours worked \* 200,000;  
 - recordable work accident rate: number of recordable work accidents / number of hours worked \* 200,000.  
 Recordable accidents: all accidents (whether or not resulting in death), days of absence from work, restriction of work duties or transfer to another job, medical treatment beyond first aid or unconsciousness, major injury or illness diagnosed by a doctor or other licensed health professional, even if not resulting in death, days of absence from work, restriction of work duties or transfer to another job, medical treatment beyond first aid or unconsciousness.  
 Recordable accidents with serious consequences: accidents leading to an injury from which the worker (employee) cannot recover, does not recover or it is unrealistic to expect that he/she will fully recover to his/her pre-accident state of health within 6 months (excluding deaths).

## 6. Environmental impact

During 2023, Tessellis supported activities in the direction of increasing the environmental sustainability of its site. Some of the key activities implemented during 2023 are summarized below, and are taken up and further detailed in the following paragraphs:

- the application of the EU Taxonomy for the identification of sustainable economic activities;
- the consolidation of waste containment policies, the use of VDI with respect to local PCs, reducing electrical equipment to be disposed of, by Tiscali Italia S.p.A;
- the improvement of the conditions of the waste storage area, raising awareness among Business customers about the use and end-of-life of products through the preparation of the “WEEE disposal communication” to be included in the Welcome Pack, by Tiscali Italia S.p.A;
- adhesion to “The Greenest” project, by Tiscali Italia S.p.A., promoted by SIDI, by purchasing a lot of 20,000 trees planted in Madagascar, thus giving life to its own corporate forest.

On the occasion of World Earth Day in April 2022, the Tiscali.it portal launched an initiative to make a concrete contribution to environmental protection: in collaboration with “The Greenest”, it offered its readers the chance to plant a tree for free, up to a maximum of 50,000 trees in total. Continuing a path already embarked upon in December 2021, in June 2023 Tiscali Italia and SIDI (Swiss Institute for Disruptive Innovation) reinforced their joint commitment with the planting of 20,000 trees, which will expand Tiscali’s existing corporate forest. As a result, the corporate forest will have a total of no less than 45,000 trees of different mangrove species, the plant chosen for the reforestation of Madagascar: it will be one of the largest corporate forests in Europe and will contribute to the reduction of 1,350 tonnes of CO2 per year, while guaranteeing additional fair employment opportunities for the people in the regions that will host the new trees.

- On 31 January 2023, Tiscali Italia S.p.A. signed a partnership agreement with Agrenta S.r.l., a Sardinian start-up operating in industrial research and development in the field of agricultural sciences and food technologies, for the realization of projects accompanying towards Agriculture 4.0.

The partnership aims to facilitate the digital transition of agricultural enterprises in Sardinia through the implementation of sustainable agri-food systems enabled by Tiscali’s “Linkem4Farm” technologies, which qualifies as the first all-in-one solution for Agriculture 4.0, comprising an app for farm management, IoT sensors for intelligent monitoring in the agronomic field, connectivity and installation. The collaboration aims to accelerate the digital transition of companies in the sector on the island and beyond, in the context of the national “Agriculture 4.0” strategy. Through the dissemination of digital skills, the aim is to promote the digitization of the agricultural and agri-food supply chain on topics of common interest, joint support for agricultural and agri-food companies in accessing incentives and public funds in the area of Agritech and Smart Farming, the design and development of R&D projects, the construction of tech transfer projects, and the sharing of best practices.

In addition, thanks to the agreement with Agrenta, the Tessellis group has created “Future Communities”, an innovation programme dedicated to new business models for the digital transformation of companies and public administrations in which Linkem4Farm was created, becoming a virtuous example of Open Innovation. Thanks to this programme, an inclusive and participatory process is generated which, starting from the analysis of concrete needs, develops tools, platforms and vertical services with high added value through the collaboration with innovative start-ups, research centers and industrial partners.

As a result of this collaboration, the conference “Agricoltura 4.0: safeguarding the national agricultural heritage” was held on 3 March 2023 at the Casale Vigna Ferri Rossi di Medelana farm in Frascati (RM). The meeting, organized by the Innovation Lab of Tiscali Italia S.p.A., the smart telco of the Tessellis group, and the Rossi di Medelana winery, was attended by oenologists, agronomists, farms, institutions and the media. The aim of the conference was to discuss Agriculture 4.0 as a lifesaver and sentinel of the national agricultural heritage, focusing in particular on profitability and economic, environmental and social sustainability, emphasizing topics such as optimization of water resources, impact on the territory, defense against pathogens, targeted treatments, cost-saving methods.

## 6.1 EU Taxonomy of Sustainable Economic Activities

Regulation (EU) no. 2020/852, also known as the Taxonomy Regulation (hereafter also referred to as the “Regulation”), was adopted by the Council and the European Parliament in June 2020 and is designed to harmonize and support organizations in identifying economic activities that can be considered environmentally sustainable. This means that the regulation should help companies to become more climate and environmentally friendly, mitigate market fragmentation and help target investments.

To qualify as environmentally sustainable, an economic activity must contribute substantially to one or more of the six environmental objectives set out in Article 9 of the Taxonomy Regulation. These objectives are: climate change mitigation, climate change adaptation, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, and protection and restoration of biodiversity and ecosystems.

In summary, the Taxonomy Regulation represents an effort by the European Union to promote sustainable investments and to encourage companies to adopt more environmentally responsible practices. The European Taxonomy provides a solid basis for classifying sustainable assets, helping to prevent greenwashing and protect investors.

A delegated act, Delegated Regulation (EU) no. 2021/2139, was adopted on 4 June 2021, which specifies the application and content of the technical screening criteria that specific economic activities must fulfil for the first two environmental, climate-related objectives. This delegated act was further updated with the publication of Delegated Regulation (EU) no. 2023/2485 as of 27 June 2023, as well as with the publication of Delegated Act no. 2023/2486, which, by supplementing EU no. 2020/852, determines the technical screening criteria for determining under which conditions an economic activity can be considered to contribute substantially to the four environmental objectives, namely: the sustainable use and protection of water and marine resources, the transition to a circular economy, the prevention and reduction of pollution, and the protection and restoration of biodiversity.

The latter delegated acts were carefully considered by Tessellis for the update of the EU Taxonomy disclosure in the DNF 2023.

The Tessellis Group, being included in the scope of application of the Non-financial Reporting Directive (NFRD), is subject to disclosure obligations relating to the reporting of its economic activities falling within those considered eco-sustainable according to the taxonomy classification, as provided for in the Taxonomy Regulation (EU) no. 2020/852, the Delegated Regulation (EU) no. 2021/2139 (Climate Delegated Act) and the Delegated Regulation (EU) no. 2021/2178 (Disclosure Regulation) on the content of the information and the manner in which it is represented.

Given the updates of the Regulation to 2023, in this document, the disclosure under the EU Taxonomy of the Tessellis Group concerns the eligibility for both climate and environmental objectives, and the alignment limited to the first two objectives of the Regulation, i.e. climate change mitigation and climate change adaptation, indicating the percentage of economic activities eligible and aligned with reference to turnover, CapEx and OpEx.

Finally, considering the recent entry into force of the Regulation and the technical complexity posed by the requirements, the Tessellis Group's approach in identifying eligible and aligned activities has been based on strict compliance with the guidelines of the Regulation, resulting in the exclusion of projects not included in the Delegated Acts of the Regulation.

The Tessellis Group has structured a methodology to determine eligible and aligned activities to the Taxonomy, including the identification of eligible activities, the analysis of the substantial contribution to the objectives through the technical screening criteria, the verification of the principle of no significant harm to other objectives, the verification of compliance with minimum safeguards, and the calculation of KPIs and financial metrics.

The process of determining permissible and aligned activities was conducted by involving various functions of the Group, with the aim of bringing together skills and experience in the analyses carried out and the determination of results. In particular, the Group's management control was responsible for the quantification of the turnover, CapEx and OpEx quotas for each asset and the collection of the underlying detail, while other functions of the Group were involved in the analysis and in-depth analysis of the technical screening criteria, DNSH principles and compliance with the minimum safeguards.

The Group concluded that the percentage of Turnover, CapEx and OpEx aligned to the Taxonomy is 0%, thus excluding activities that do not meet the criteria set by the EU regulations.

More details on the methodology used by the Group will be provided in the following paragraphs.

## Eligible Activities

An economic activity is admissible (or eligible) under the European Taxonomy if there is a corresponding description in the Delegated Acts, regardless of whether or not this activity meets the technical screening criteria in the Delegated Acts. In order to determine which activities are admissible under the Taxonomy, preliminary analyses were carried out with the help of the NACE codes and screening analyses of the activities in question, in cooperation with the various corporate functions involved. In view of the elements illustrated in the preceding paragraphs, the analyses conducted led to the identification of the following eligible activities<sup>11</sup>:

Economic activities	Description	Objective
<b>8.1 DATA PROCESSING, HOSTING AND RELATED ACTIVITIES</b>	Storage, manipulation, management, movement, control, display, switching, interchange, transmission or processing of data through data centers, including edge computing.	Climate change mitigation
<b>8.3 PROGRAMMING AND BROADCASTING ACTIVITIES</b>	Programming and broadcasting activities include the creation of content and the acquisition of the rights to distribute it, with subsequent broadcasting in radio and television entertainment programmes, news programmes, talk shows and the like. Also included is the broadcasting of texts, typically linked to radio or television broadcasts. Broadcasting may take place through the use of different technologies, via repeater, satellite, cable or the Internet. It also includes the production of programmes intended by their nature for a restricted audience (e.g. news, sports, educational programmes, programmes aimed at a young audience) available by subscription or for a fee to third parties, for subsequent broadcasting to the public.	Climate Change Adaptation
<b>4.1 POWER GENERATION BY PHOTOVOLTAIC SOLAR TECHNOLOGY</b>	Construction or operation of power generation plants using photovoltaic solar technology.	Climate change mitigation
<b>5.3 PREPARING FOR RE-USE OF END-OF-LIFE PRODUCTS AND COMPONENTS</b>	Preparation for Re-use of End-of-Life Products and Components (*) The economic activity does not include repair activities, which are carried out during the use phase of the product.	Transition towards a circular economy

(\*) Preparation for re-use is an operation or set of operations by which products or components of products that have become waste are prepared so that they can be re-used without any further pre-processing. After waste prevention, it is the most preferred waste management option.

<sup>11</sup> As explained below, the eligible activities listed relate only to turnover and Opex KPIs.



As indicated by the Regulations, in carrying out this exercise the Tessellis Group has taken into consideration the climate and environmental objectives that it intends to pursue from the economic activities identified. In particular, this criterion has significant value for activities such as 8.1 (Data processing, hosting and related activities) and 4.1 (Power Generation by Photovoltaic Solar Technology) which, having the same description within the two delegated acts, can contribute to both objectives.

### **Analysis of the substantive contribution to the objectives through the technical screening criteria and verification of the DNSH principle**

The activities assessed as eligible were subjected to an initial alignment analysis, verifying compliance with the technical screening criteria, considering that, based on the nature of the activities identified as eligible, the examination of compliance with the technical screening criteria also depends in part on information held by the suppliers of products and services. The Group has started a process of defining the information flows necessary to collect the information aimed at ensuring the verifiability of the turnover, CapEx and OpEx data aligned to the Taxonomy, which will be strengthened and improved over the next few years, also in light of regulatory developments. For the relevant activities identified, the Group carried out an initial assessment of the DNSH for which the same considerations expressed in relation to the technical screening criteria are valid.

### **Verification of compliance with minimum safeguards**

The European Taxonomy stipulates that an economic activity, in order to qualify as environmentally sustainable, must be carried out in compliance with minimum safeguards, as expressed in Article no. 18 of the EU Taxonomy Regulation no. 2020/852. In this circumstance, the objective of the EU is to ensure that entities carrying out environmentally sustainable activities, labelled as aligned with the Taxonomy, comply with certain minimum governance standards and do not violate social norms, including human rights and labour rights. In other words, the aim is to prevent green investments from being labelled and considered “sustainable” even when they involve corrupt practices, including tax laws, anti-competitive practices and negative impacts on human rights, including labour rights. In order to meet the requirements for minimum safeguards, the Platform on Sustainable Finance prepared a report summarizing the main requirements of the principles of the international organizations mentioned in Article no. 18 of the European Regulation 2020/852, analyzing overlaps and excluding principles outside the context of the European Taxonomy. The Group has based its analysis on the indications of this report<sup>12</sup>, assessing compliance with the requirements in four key areas: Human Rights, Corruption, Taxation, Fair Competition.

### **KPI Calculation**

On the basis of the previous steps, the percentage of eligible and aligned economic activities was calculated, associating to each activity the financial metrics required by the Regulation: Turnover, CapEx and OpEx. The percentage of the Group’s economic activities eligible and aligned to the Taxonomy with respect to Turnover, CapEx, and OpEx was calculated in accordance with the legal requirements and according to the accounting criteria specified in Annex I of the Delegated Regulation related to Article no. 8. However, the Tessellis Group, in order to carry out a correct valuation of the economic activities and calculation of the KPIs, needed to develop and use appropriate estimates for the identification of the correct percentage of eligible and aligned economic activities, as specified in the sections on each activity.

<sup>12</sup> Source: [https://finance.ec.europa.eu/system/files/2022-10/221011-sustainable-finance-platform-finance-report-minimum-safeguards\\_en.pdf](https://finance.ec.europa.eu/system/files/2022-10/221011-sustainable-finance-platform-finance-report-minimum-safeguards_en.pdf)

Based on the analyses performed, the summary of the overall results obtained is as follows:

Table 16 – Eligible Turnover, CapEx and OpEx aligned with EU Taxonomy Regulation for 2023

KPI	Non-eligible Activities	Eligible Activities	Aligned activities
Turnover	99.42%	0.58%	0%
CapEX	100%	0%	0%
OpEX	88.32%	11.68%	0%

The CapEx KPI refers to the increase in tangible and intangible assets during 2023 before depreciation, amortization, impairment and revaluation, including those resulting from impairment or the application of the fair value criterion. For 2023, the Group did not record any CapEx related to assets eligible under the Taxonomy Regulations.

## Climate Change Adaptation Goal

### Activity 8.1 Data processing, hosting and related activities

Since activity 8.1 (Data processing, hosting and related activities) has the same description for both climate objectives, the Tessellis Group has decided to carry out the analysis related only to the climate change mitigation objective, considering the nature of its activities to be more related to this objective and in order to avoid the risk of double-counting. This item included the activities performed by the Sa Illetta datacenter, mainly related to housing and hosting services of IT facilities for storage and processing. The Group proceeded to identify the share of turnover related to these activities, while the OpEx share was determined using the % weight of turnover related to activity 8.1 on total turnover. This criterion appears to be the least random in order to identify the total OpEx/OpEx component. Based on the verification of the technical screening criteria, DNSH compliance and minimum safeguards, turnover and OpEx related to this activity cannot yet be defined as aligned to the Taxonomy.

Please refer to the summary of the results obtained from the eligibility and alignment phases in Chapter 8.

### Activity 4.1 Power Generation by Photovoltaic Solar Technology

Since activity 4.1 (Power generation by photovoltaic solar technology) presents the same description for both climate objectives, the Tessellis Group has decided to carry out the analysis related only to the climate change mitigation objective, considering the nature of its activities to be more related to this objective and in order to avoid the risk of double-counting. This item includes operating expenses related to the photovoltaic system installed at the Sa Illetta site.

Based on the verification of technical screening criteria, compliance with DNSH and minimum safeguards, the OpEx related to this activity cannot yet be defined as aligned with the Taxonomy. Please refer to the summary of the results obtained from the eligibility and alignment phases in Chapter 8.

## Climate Change Adaptation Goal

### Activity 8.3 Programming and broadcasting activities

This item includes the editorial management activities of the Group's portals and other proprietary platforms.

In particular, the Group offers programming consisting of its own content and/or content purchased from third parties, playing a potential role in disseminating and raising awareness of climate change issues and its consequences. Specifically, the Group offers various packages that include films, TV series, cartoons and entertainment of various kinds for the viewer.

The Group has identified, in particular, the share of operating expenses related to this activity. Based on the verification of the technical screening criteria, DNSH compliance and minimum safeguards, the OpEx related to this activity cannot yet be defined as aligned to the Taxonomy. Please refer to the summary of the results obtained from the eligibility and alignment phases in Chapter 8.

## Objective of transition towards a circular economy

### Activity 5.3 Preparation for Re-use of End-of-Life Products and Components

This item includes activities relating to the "Rework Apparati Tiscali" project, concerning the process of regenerating equipment in cooperation with the Management of the Lecce, Rebibbia and Cagliari prisons. In particular, the Group is in charge of regenerating, with a view to a circular economy, obsolete telecommunications equipment at three laboratories in the Rebibbia, Lecce and Cagliari prisons. In 2023, more than 25 people contributed to this regeneration process, hired on a temporary and part-time basis at Tessellis.

This activity generates revenue shares associated with the re-introduction of remanufactured equipment into the market, also on behalf of third-party operators operating in the telecommunications sector. Based on the verification of technical screening criteria, compliance with DNSH and minimum safeguards, the Revenues associated with this activity cannot yet be defined as aligned to the Taxonomy.

Please refer to the summary of the results obtained from the eligibility and alignment phases in Chapter 8.

## 6.1.1 Assessment of the impact of climate change on Tiscali's production facilities

Tessellis, in the context of assessing its long-term going concern, has estimated the effects of climate change and their possible economic and financial impacts on the company's business.

The analysis was conducted focusing particular attention on certain physical risks arising from climate change that could compromise the Data Centre infrastructure.

### Rising global average ambient temperatures

The rise in ambient temperatures was assessed

- on the Data Centre of Tiscali Italia S.p.A. in Sa Illetta (Cagliari);
- on the production facilities located on the national territory;
- on the interconnection devices allocated at the end customer's premises.

**Effect of rising temperatures on the Cagliari- Sa Illetta data center**

The Data Centre of Tiscali Italia S.p.A. is equipped with cooling machines that can cope with a rise in external temperature of up to 55°C. The operating range of the equipment used for cooling the Data Centre, in fact, goes from -17.5°C to 55°C. The maximum temperature recorded in the Data Centre’s geographical area in the year 2023 is 40.1°C. Therefore, even assuming a ten-year increase in the global average temperature of 1.5°C, the current systems are able to meet the cooling needs for a period longer than the expected useful life of the systems themselves.

**Effect of rising temperatures on production facilities across the country**

In addition to the main Data Centre of Sa Illetta, Tiscali Italia S.p.A. has more than 29 POPs active on the national territory, partly located at the facilities of other operators and others in co-location, hosting equipment (routers/servers) with technical characteristics similar to those present in the data center. The same considerations applied to the data center with regard to the hypothesis of higher environmental temperatures apply to them. It should be borne in mind that, over the last few years, a process of replacing the air conditioning systems on these POPs has been initiated and will be completed in the next few years, thus making it possible to cope with potential increases in external temperatures.

Effect of rising temperatures on the interconnection devices supplied and installed at the customer’s premises for service provision.

Climate change caused by global warming, may adversely affect internet service, affecting its availability, quality, security and cost.

According to a report by the British Government, high temperatures lead to a reduction in the range of Internet communication, while frequent thunderstorms impact signal reliability, and this undoubtedly represents a critical issue especially in emergency situations where efficient communications systems are required. With regard to the Company’s modems, in particular, these are assets that are installed in customers’ premises, during contract activation. These devices are divided into two categories:

- indoor devices: modems related to fiber services (FTTH/FTTC) and FWA services;
- outdoor devices: modems related to FWA services.

The technicians evaluated the effects of climate change on these devices are able to withstand outdoor temperature rises of up to 56°C, without impacting device operation.

**Sea level rise - effect on production facilities located in Sa Illetta – Cagliari**

Global warming is the main cause of melting polar glaciers and warming oceans, which in turn affect sea levels, affecting their density and salinity.

IPPC 813 studies predict sea level rise by 2100 of about 43 cm in the case of very high emission reductions, and about 84 cm in the case of high emissions.

The offices and Data Centre of Tiscali Italia S.p.A. are located in the Sa Illetta locality, about 2 km from the town of Cagliari. It is one of the largest wetlands in Europe and is of particular environmental importance as it is populated by protected animal and plant species.

Tiscali Italia S.p.A.’s Data Centre is about 90 meters from the pond on the north side. The servers are located on the second floor of the building, while the generators, electrical substations and uninterruptible power supply systems are located on the ground floor.

The technicians believe that in the event of a 30 cm rise in sea level over the next 12 months (a hypothesis that is, however, highly unlikely), the waters of the lagoon could not in any case lap the building that houses the Data Centre, nor reach any of the equipment intended for the company's production activities because this rise would not reach the ground level of the Datacenter (about 2 meters above sea level) anyway. There is also a guard channel around the area for the outflow of water towards the sea that would protect the existing structures even for higher water level rises. For this reason, the technicians believe that there is no reasonable risk of having to make investments to protect the Data Centre's machinery or other machinery used for production activities.

Similarly, the technicians believe that the servers will not suffer any damage, related to this climatic event, that could compromise their ability to function.

Should the sea level rise by more than 2 meters over a period of 10 years, an event that is, however, highly unlikely, this would not lead to the need for an investment to upgrade part of the DPC infrastructure, for the reasons explained above.

Considering the climate changes hypothesized for the next 10 years, it is not expected that there will be a significant change in the useful life of the equipment and systems of the Datacenter as a result of the rise in average temperatures and water levels.

With reference to the evaluations carried out on the consequences that would derive from the two potential climatic events outlined above (i.e., rising global temperatures and rising sea levels), the technicians believe that the assets will maintain their physical integrity and, therefore, their production capacity unchanged over the 12 months.

That being said, it is reasonably believed that it will not be necessary to relocate the company's headquarters in the next 10 years. Similarly, no specific insurance policy is deemed necessary for damages.

## 6.2 The ISO 14001 environmental certification

The Tessellis Group has always considered controlling the environmental impacts of its activities one of the main areas of its commitment.

The Group considers it fundamental to be committed to the promotion of environmental sustainability, to monitor the risks for the environment and the local community deriving from the performance of its activities and, for the most significant impacts, to implement policies and projects for the improvement and mitigation of such risks, in a continuous search for balance between infrastructure development and environmental protection.

In order to allow a continuous improvement of its environmental strategies, Tiscali Italia S.p.A. started, during 2019, a virtuous path, which allowed it to obtain, on 16 December 2019, the ISO 14001 certification for an Environmental Management System consisting of policies, processes, plans, practices and records that define the rules of interaction of the company with the environment. The ISO 14001 Standard represents the regulatory reference point for companies and organizations that have, or intend to have, an Environmental Management System, aimed at managing environmental aspects, meeting legislative compliance obligations and addressing and assessing risks and opportunities.

Tiscali Italia S.p.A. has continued to implement the indications dictated by the ISO 14001 standard, appointing both a Manager of the Integrated Quality Management System, whose duties also include environmental management, and a Security Manager, with specific competence in information security issues, and, annually, defining an environmental management plan, broken down into a series of objectives with evidence of what has been achieved for the current year and what is to be achieved for the following year.

The ISO 14001 certification was audited again in 2020, 2021 and on 30 November 2022 its renewal was certified, confirming the Company's attention and sensitivity to environmental issues. The scope also includes the subsidiary 3P Italia S.p.A. for the field of application "Design, implementation and management of services under concession for the automation, innovation and digitalization of public services", which has obtained from the Certification Body Axe Register compliance with the requirements of the ISO 14001:2015 standard. The date of first issue is 14 October 2020; the expiry date is set for 13 October 2023, and the scope of the certification has been extended to include all the activities of the Cagliari office, with a consequent change in the scope of the certification. This scope was updated as follows: Development, sale and remote assistance of ICT and Cloud data center systems and services for companies and public administrations; Development, sale and remote assistance of connectivity and telephony services for Division Companies, Public Administration and private customers; Production and delivery of editorial content on portals and multimedia systems.

The next deadline is set for December 2024. Please refer to the following paragraphs for a detailed description of the objectives achieved by the Company in 2023.

### 6.3 Energy consumption and CO<sub>2</sub> emissions

Human activities are having an increasing impact on the Earth's climate and temperature due to the greenhouse effect and global warming. Information and communication technology (ICT) companies generate significant electricity consumption, which makes the issue of climate change particularly relevant for this sector.

Tessellis is committed to reconciling infrastructure development with environmental protection, through a constant balance in the planning of activities. The Group takes specific actions to reduce its environmental impact and propose inclusive and sustainable technological solutions, to contribute to the creation of a better digital society for people and businesses.

#### Energy consumption

Energy consumption represents Tiscali's main environmental impact. During 2023, energy efficiency measures were implemented with the aim of reducing environmental impacts and investing economic and organisational resources aimed at reducing energy consumption.

Table 17 – GRI 302-1: Total energy consumption within the organization

Total energy consumption within the organization			
Energy consumption	Units of Measurement	2022	2023
<b>Total energy consumption</b>	<b>GJ</b>	<b>46,738</b>	<b>47,642</b>
of which from renewable energy	%	4.29%	4.33%
<b>Electricity consumption</b>	<b>GJ</b>	<b>45,653</b>	<b>44,400</b>
of which from renewable energy	GJ	2,007	2,064
	%	4.40%	4.65%
<b>Consumption of fossil fuels</b>	<b>GJ</b>	<b>1,085</b>	<b>3,242</b>
<b>of which from stationary sources</b>	<b>GJ</b>	<b>46</b>	<b>46</b>
Natural gas	GJ	46	41
Diesel (for heating or production processes)	GJ	0	1
Petrol (for heating or production processes)	GJ	0	4
<b>of which from mobile sources</b>	<b>GJ</b>	<b>1,039</b>	<b>3,196</b>
Diesel (for company-owned or leased/long-term rented vehicles)	GJ	549	1,269
Petrol (for company-owned or leased/long-term rented vehicles)	GJ	490	1,927

Total energy consumption increased by about 2% between 2022 and 2023. In 2023, there is an improvement in the use of renewable energy sources, amounting to 4.33% of the total. The significant increase in the use of fossil fuels is mainly due to the increase in fuels used for mobile sources (1.4%), while those used for stationary sources remained unchanged. More details are given in the following paragraphs.

**Electricity consumption** is mainly determined by the consumption of **Tiscali Italia S.p.A.'s network infrastructure and data center** for the provision of services. These include servers, equipment and auxiliary systems located in the technological premises and wireless sites throughout Italy. However, thanks to the energy efficiency projects implemented in the Cagliari Data Centre, there has been a significant reduction in the consumption of the technological equipment of the technical sites.

For more details, see section “6.4 - Energy Efficiency Initiatives”. In addition to these, there is the consumption relating to the operation of Tiscali Italia’s offices in Rome, Bari and Taranto, and of 3P Italia, which together account for less than 3% of the total consumption of electricity purchased from the network.

Table 18 – GRI 302-1: Total energy consumption by source (GJ)<sup>13</sup>

Energy Sources (GJ)	Year 2022	Year 2023
Electricity (GJ)	45,653	44,401
of which purchased	43,646	42,337
of which from photovoltaics	2,007	2,064

Following a process of continuous improvement, the total amount of electricity purchased has been restated in order to report the consumption of electricity at Tiscali Italia S.p.A., 3P Italia S.p.A. For previously published data, please refer to the 2022 Non-Financial Statement, available at [www.tessellis.it](http://www.tessellis.it).

Due to the occasional nature of the operation, the consumption of diesel fuel for the operation of generator sets at the technical sites, which are necessary to guarantee the continuity of service on the network in the event of a temporary interruption of the electricity supply, can be considered negligible. There is a consumption of 1,200 standard cubic meters, equal to 43 GJ, of natural gas at 3P Italia’s sites in 2023, a downward trend of 8% compared to 2022.

Tiscali and 3P Italia record a consumption of diesel for automotive use, which is related to the activities of managers and employees who need to travel to meet external entities, using company cars. These cars are mainly used for sales activities throughout the country, including the islands. Since the merger with the Linkem Retail Unit in 2022 already, the number of company cars has increased significantly from 4 to 54. At the end of 2023, the fleet will comprise 58 company cars, of which forty will be hybrids and two plug-in hybrids, with a consequent increase in fuel consumption associated with them. Hybrid cars are vehicles that combine an electric motor and a combustion engine, while plug-in hybrids have a greater capacity to travel distances in all-electric mode, as they can be recharged via an electric socket.

The fuel consumption for diesel- and petrol-powered cars for the year 2023 is summarized in the table below:

Table 19 – GRI 302-1: Vehicle fuel consumption<sup>14</sup>

Fuel consumption			Year 2022				Year 2023		
For leasing/long-term rental vehicles	Units of measurement	Total	Units of measurement	Total	Units of measurement	Total	Units of measurement	Total	
Diesel	liters	15.263	GJ	549	liters	35.260	GJ	1.269	
Petrol	liters	14.795	GJ	490	liters	60.365	GJ	1.927	

Following a process of continuous improvement, the total amount of electricity purchased has been restated in order to report the consumption of electricity at Tiscali Italia S.p.A., 3P Italia S.p.A. For previously published data, please refer to the 2022 Non-Financial Statement, available at [www.tessellis.it](http://www.tessellis.it).

Emissions into the environment can be represented in the following categories:

- direct emissions (Scope 1): direct emissions due to activities of Tiscali or its subsidiaries (e.g. use of heating/cooling and transport fuels);
- indirect energy emissions (Scope 2): indirect emissions from the purchase of electricity.

<sup>13</sup> The following conversion factors were used to calculate energy consumption in GJ:  
 - Electricity, steam and hot water: for 2022 and 2023 is 0.0036 GJ/kWh.

<sup>14</sup> The following conversion factors were used to calculate energy consumption in GJ:  
 - Automotive diesel: for 2022 and for 2023 it is equal to 0.03595 GJ/l (source: ISPRA 2022, NIR - NATIONAL INVENTORY REPORT 2022); for 2023 it is equal to 0.03599 GJ/l (source: ISPRA 2023, NIR - NATIONAL INVENTORY REPORT 2023);  
 - Automotive petrol: for 2022 is 0.03312 GJ/l (source: ISPRA 2022, NIR - NATIONAL INVENTORY REPORT 2022) and for 2023 is 0.03192 GJ/l (source: ISPRA 2023, NIR - NATIONAL INVENTORY REPORT 2023).



**Table 20 – GRI 305-1/2: Total direct emissions (Scope 1) [T CO<sub>2</sub>] and indirect emissions (Scope 2) Location-based [T CO<sub>2</sub>] and Market-based [T CO<sub>2</sub>]<sup>15</sup>**

Type	Units of Measurement	Year 2022		Year 2023	
		Total	Units of Measurement	Total	Units of Measurement
Scope 1	TCO <sub>2</sub>	197	TCO <sub>2</sub>	808	
Of which direct emissions from combustion	TCO <sub>2</sub>	79	TCO <sub>2</sub>	237	
Of which emissions from refrigerant gases	TCO <sub>2</sub> eq	118	TCO <sub>2</sub> eq	571	
Scope 2 – Location Based	TCO <sub>2</sub>	3,153	TCO <sub>2</sub>	3,151	
Scope 2 – Market based	TCO <sub>2</sub>	5,546	TCO <sub>2</sub>	5,374	

Following a process of continuous improvement, the total emissions of Scope 1 and Scope 2 have been restated in order to report the emissions from electricity and fuel consumption at Tiscali Italia S.p.A., 3P Italia S.p.A. For previously published data please refer to the 2022 Non-Financial Statement, available at [www.tessellis.it](http://www.tessellis.it).

Emission factors used				
2022				
Scope 1	R407C	1,774	tCO <sub>2</sub> eq/kg	Defra 2022
	R410A	2,088	tCO <sub>2</sub> eq/kg	Defra 2022
	HFC-134a	1,430	tCO <sub>2</sub> eq/kg	Defra 2022
	Natural gas	0.0563	tCO <sub>2</sub> /GJ	ISPRA 2022
	Automotive diesel	0.0735	tCO <sub>2</sub> /GJ	ISPRA 2022
	Automotive petrol	0.0731	tCO <sub>2</sub> /GJ	ISPRA 2022
Scope 2	Electricity Market based method	0.457	kg CO <sub>2</sub> /kWh	AIB European Residual Mixes 2022
	Electricity Location based method	0.2598	kg CO <sub>2</sub> /kWh	ISPRA 2022
2023				
Scope 1	R407C	1,624	tCO <sub>2</sub> eq/kg	Defra 2023
	R410A	1,924	tCO <sub>2</sub> eq/kg	Defra 2023
	HFC-134a	2,473	tCO <sub>2</sub> eq/kg	Defra 2023
	Natural gas	0.0565	tCO <sub>2</sub> /GJ	ISPRA 2023
	Automotive diesel	0.0735	tCO <sub>2</sub> /GJ	ISPRA 2023
	Automotive petrol	0.0731	tCO <sub>2</sub> /GJ	ISPRA 2023
Scope 2	Electricity Market based method	0.457	kg CO <sub>2</sub> /kWh	AIB European Residual Mixes 2023
	Electricity Location based method	0.2679	kg CO <sub>2</sub> /kWh	ISPRA 2023

<sup>15</sup> Scope 2 emissions are expressed in tonnes of CO<sub>2</sub>; however, the proportion of methane and nitrous oxide has a negligible effect on total greenhouse gas emissions (CO<sub>2</sub>-equivalents) as can be deduced from the technical literature.

The significant increase in the number of vehicles in the company car fleet influenced the total increase in Scope 1 emissions due to the increased use of fuels. In addition, this increase was also influenced by a significant increase in emissions from refrigerant gases, following the improved collection of data that, for 2023, also includes the f-gas refills that took place at the Taranto site (equivalent to over 88% of the total refrigerant gases for the year), as detailed in the table below. There was no significant change instead for Scope 2 emissions, which were substantially in line with the previous year.

Table 21 – GRI 305-1: Refrigerant gases by type (kg) - Tiscali Italia S.p.A.

Refrigerant gases	Units of Measurement	2022	2023
R-407C	Kg	21	21
R-410A	Kg	36	279
R422D	Kg	2	0
Total	Kg	59	300

## 6.4 Energy efficiency initiatives

Tessellis monitors risks to the environment and the local community arising from the conduct of its business and, for the most significant impacts, has put in place policies and projects to improve and mitigate these risks.

### Data Centre Energy Efficiency Projects

Tiscali Italia S.p.A. carried out a project to modernize, make efficient and rationalize its Data Centre equipment starting in 2017. Thanks also to the massive adoption of virtualization solutions, this project allowed the shutdown of a large number of old-generation equipment, bringing significant improvements in the efficiency of the Data Centre.

### Energy efficiency projects on air conditioning systems

In the course of 2023, Tiscali Italia S.p.A. managed to further improve its energy efficiency targets, without making new investments but by exploiting the contribution deriving from the optimization of the interventions carried out in previous years, which had envisaged the replacement of some highly energy-intensive elements of the cooling systems with new-generation technologies characterized by higher energy efficiency. This entailed a special focus on air-conditioning systems, UPS voltage continuity systems and the photovoltaic production system. In addition, the rationalization of energy consumption has helped to mitigate the operating costs of the data center system.

In the context of reducing energy consumption, the Company carried out the energy diagnosis as required by Legislative Decree no. 102/2014, in order to identify any further opportunities for improvement. The energy diagnosis was completed by December 2023, as required by law. Currently, the Group is defining the scope of activities based on the corporate structure following the integration with the Linkem Group, at the end of which an order will be formalized towards the selected supplier. During 2023, the collaboration started with some of the leading companies in the supply of hardware, software and services to maximize availability, power and efficiency in data centers was continued. The main objective was to conduct a feasibility study to replace

part of the room air conditioning units (CRAH) in order to further improve the company’s energy efficiency. The preliminary study was conducted mainly with STULZ and VERTIV for the hardware and software part, while SIEMENS took care of the software part. This study returned an estimate of hypothetical energy savings of approximately 200,000 kWh/year (ROI < 3 years) for the VERTIV case, envisaging the replacement of indoor units and possibly the reconfiguration of the air-conditioning system from fixed to variable flow mode. Specifically, it is planned to replace eight units (6.2 kW by 63 kWf each) with five to seven units (2.1 kW by 72 kWf each). The revamping project of the CRAH systems in the data center has seen the completion of the cost-benefit analysis and general feasibility phase, but the company is currently evaluating the various cost alternatives of the project for start-up. The drastic reduction in power consumption and thus the higher overall efficiency of the new CRAH system result from greater efficiency in the air ventilation unit (frequency-controlled fan), greater efficiency in air-water heat exchange, and greater efficiency in temperature feedback control.

**Overall energy consumption**

It should be noted that for the year 2023, Tiscali Italia S.p.A. has focused its efforts on mitigating energy consumption through the optimization of energy efficiency activities in relation to other plants and production sites, in addition to the data center.

At an overall level, the consumption of electricity purchased for the year 2023 tends to be in line with the figures for the previous year, as shown in the table below:

Table 22 – GRI 302-1: Electricity consumption (kW/h)<sup>16</sup>

Energy Sources (kW/h)	Year 2022	Year 2023
Electricity (kW/h)	12,693,451	12,333,513
of which purchased	12,135,810	11,760,304
of which from photovoltaics	557,641	573,209

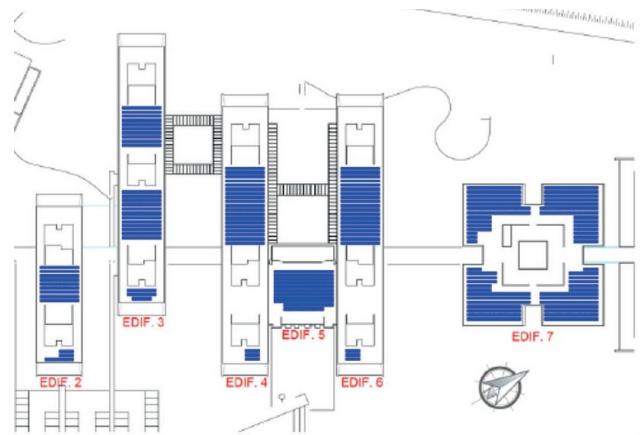
Following a process of continuous improvement, total electricity consumption has been restated in order to report consumption at Tiscali Italia S.p.A., 3P Italia S.p.A. For previously published data, please refer to the 2022 Non-Financial Statement, available at [www.tessellis.it](http://www.tessellis.it).

**Construction of a photovoltaic system at the Sa Illetta site**

Since 2020, Tiscali Italia S.p.A. has signed an agreement with a significant Italian company to build a photovoltaic plant on the roofs of the Sa Illetta Campus. Photovoltaic systems represent a sustainable source of electricity that does not generate negative impacts on the ecosystem, thanks to the use of the inexhaustible and clean energy provided by the sun. In addition, they contribute to reducing the demand for energy from traditional sources, thus helping to reduce climate-altering emissions.

In particular, the photovoltaic plant built by Tiscali Italia S.p.A. is able to reduce atmospheric emissions by 248,532 kg of CO2 per year, equivalent to the amount of CO2 absorbed annually by 1,926 trees. The estimated productivity of the photovoltaic system, based on the prevailing exposure conditions of the building, is 557,872 kWh/year, with a final peak power of 398.48 kWp, equal to approximately 6% of the annual energy needs of the Sa Illetta site.

<sup>16</sup> The following conversion factors were used to calculate energy consumption from stationary sources in GJ:  
 - Electricity: 0.0036 GJ/kWh (source: International System).



The image on the left illustrates the floor plan of the Sa Illetta site, showing the positioning of the photovoltaic modules (area colored in yellow). In the image above, the photovoltaic modules positioned are highlighted in blue.

The investment for the construction of the photovoltaic plant was entirely covered by the supplier, who took responsibility for the design, construction, commissioning and testing of the entire plant, as well as the management of the administrative and bureaucratic activities towards the various control bodies. Tiscali Italia S.p.A. did not acquire ownership of the plant, but leases it for a period of 10 years, during which it will continue to benefit from the energy produced.

At the end of the lease period, Tiscali Italia S.p.A. will have the opportunity to acquire ownership of the plant without incurring any additional costs.

The estimated duration of the plant is 25 years and throughout the contractual period, the supplier will guarantee a minimum annual electricity production. In the event that the actual energy production is lower than the guaranteed production, the supplier will be obliged to pay a balance in favor of the company.

Thanks to the solar power generation plant, Tiscali Italia S.p.A. will be able to contribute more significantly to achieving its goal of maximizing energy efficiency to preserve the environment. For the year 2023, the energy generated by photovoltaics, in exclusive self-consumption only on the Data Centre, amounted to 573.209 MWh. The monthly production can be deduced from the following table:

Table 23 – Total energy generated by photovoltaics.

Energy generated by PV during 2023 (MWh/month)												
JAN 23	FEB 23	MAR 23	APR 23	MAY 23	JUN 23	JUL 23	AUG 23	SEPT 23	OCT 23	NOV 23	DEC 23	Total
20.4	32.6	53.0	65.2	57.5	67.7	69.8	65.6	52.6	42.8	24.5	21.6	573.2

The mitigation of the Data Centre’s energy requirements was achieved not only thanks to the photovoltaic power generation plant, but also thanks to the energy efficiency measures started in 2020 and continued over the following years. These interventions made it possible to optimize cooling systems (chillers) and UPSs (uninterruptible power supply systems). Below is a comparison of the energy consumption of the Sa Illetta site for the year 2023:

Table 24 – Total energy consumption Sa Illetta.

	Tot Sa Illetta	Data Center	Offices	PV Production
	MWh	MWh	MWh	MWh
2023	7,434.5	4,989.9	2,444.6	573.2

### Mobility Management

Tessellis confirms its commitment to promoting and spreading the culture of sustainable mobility, with the aim of identifying innovative solutions that can facilitate the adoption of increasingly environmentally friendly modes of transport, as well as optimizing the home-work journeys of its employees.

Following the merger with the Linkem Retail Unit, Tiscali recorded a significant increase in the number of vehicles in the corporate fleet, which was mainly allocated to the sales function, operating throughout the country, including the islands.

In 2023, Tiscali allocated additional cars to employees in the Sales High Value and B2B and Network areas as per the 2022 target. The car fleet in 2023 is expected to be 58, of which 40 are hybrid cars and two plug-in cars.

Despite the increase in the number of cars, the company’s focus on sustainability remains high. Tiscali Italia S.p.A. has, in fact, inherited an ambitious project undertaken by Linkem, aimed at optimizing the company’s car fleet with a strong commitment to sustainability, through a considerable modification of the vehicles by replacing those powered by diesel with hybrid/electric vehicles, in order to significantly reduce CO2 emissions.

Thanks to the adoption of a well-defined sustainable strategy, the Company has successfully reduced the use of diesel-powered vehicles, replacing them with petrol-powered vehicles, leading to the representation of 57% of the entire car fleet by the end of 2023.

Achieving this milestone represents a significant success for the company, as it has delivered important environmental as well as economic benefits, significantly reducing polluting emissions to the benefit of the environment and community health, while at the same time improving energy efficiency and operating costs, contributing to long-term sustainability.

The goal for the coming years will be to optimize the car fleet even more, aiming to reach 90% petrol/electric vehicles at the end of long-term leasing contracts. Furthermore, in order to promote sustainable mobility among its workers and preserve the environment, the company has made carpooling systems available to employees for local travel between the company’s offices in Bari, Rome, Taranto and Cagliari. In addition, there is a car sharing station at the Sa Illetta Campus in Cagliari.

The benefits of the rational use of vehicles, which translate into a reduction in the number of cars per capita and in emissions of carbon dioxide, the main gas responsible for the greenhouse effect, represent the main advantages of the shared mobility system, with positive repercussions on the environment and urban space, and with favourable economic effects for the entire community. In this way, the Group is committed to reducing the environmental impact of our activities and encouraging an ever-increasing focus on safeguarding our planet.

### Training and Work in Prison

As detailed in the previous chapters, Tessellis is committed to safeguarding the environment by planning its activities in a continuous search for a balance between infrastructure development and environmental protection. The specific actions implemented are aimed at reducing environmental impacts and proposing technological solutions aimed at people and businesses for the realization of a digital, more inclusive and livable society.

Thanks to the collaboration and merger with the Linkem Group, within the framework of a memorandum of agreement of the “Lavorio Carcerario - Prison Work” Programme born out of the collaboration between the Ministry of Justice and the Department for Digital Transformation, the Rework Laboratories project dedicated to training and work in prisons was conceived and implemented. Since 2020, Linkem has been involved in implementing a series of training, work and digital transformation projects in collaboration with the Prison Administration, focusing on the potential of technology and training in the digital field.

Born from the collaboration with the Lecce Prison, the Rebibbia Women’s Prison, and the “Ettore Scalas” Prison in UTA - Cagliari, the Rework Laboratories are the space dedicated to the activity of complete regeneration or definitive disposal of our network equipment at the end of its useful life. As part of the first phase, Linkem developed and implemented directly through its employees a specialized training programme aimed at transferring the technical and digital skills needed to carry out the regeneration and requalification of the network terminal equipment installed in users’ premises.

All inmates were offered an employment contract with Linkem with the qualification of “Linkem electronic equipment regeneration officer”. Therefore, based on their acceptance, 28 employment contracts were actually signed and started, regularly regulated by the CCNL TLC.

The Laboratories were installed in the prison facilities renovated for this purpose by the inmate staff working in the ordinary maintenance of internal and external spaces. The working environments were set up and furnished in the same way as all Linkem offices.

The general objective is to act, through the potential of technological innovation, an important economic impact in terms of cost saving and in view of environmental sustainability and circular economy, against the backdrop of an equally considerable employment impact that, in our experience, represents the added value in the possibility of supporting the normalizing function of work in terms of re-education and social reintegration. In addition, in the Rebibbia remanufacturing workshop, equipment is also remanufactured on behalf of a telecommunications provider, thus generating revenue; at the end of 2023, revenue amounted to EUR 152,698.

Remanufactured Equipment	2023
Rework workshop Lecce	26,102
Rework workshop Rebibbia	16,494
Rework workshop Cagliari	32,618
<b>Total</b>	<b>75,214</b>

## 6.5 Actions undertaken in 2023 impacting on environmental sustainability and new perspectives

As described in section “6.2 - ISO 14001 environmental certification”, during 2019 Tiscali Italia S.p.A. introduced an ISO 14001-compliant Environmental Management system. Environmental management according to ISO 14001 represents the transition from mere compliance with laws to an integrated management of activities aimed at preventing and improving everything that affects the environment.

Tessellis has set itself the goal of raising its resources’ awareness of environmental protection. The initiatives taken in 2023 are as follows:

### Waste containment

- Tiscali Italia S.p.A. has taken an ambitious action, starting in October 2019, to phase out the use of disposable plastic in its offices on the Sa Illetta campus. Through the installation of drinking water fountains and the simultaneous elimination of plastic bottles and cups, both from automatic food and beverage dispensers and from the company canteen and cafeterias, the company has demonstrated a strong commitment to adopting sustainable practices and reducing its environmental impact;
- the company has implemented a separate waste collection system that guarantees the reuse or proper recycling of all waste produced. In addition, electronic equipment and waste generated daily in the offices is disposed of correctly, in compliance with current regulations. The amount of undifferentiated material produced was 29,900 kg, as was the production of paper waste, which amounted to 10,940 kg in the year 2023. The gradual resumption of on-site work by most employees after the smart working period led to an increase in waste production. With reference to the former Linkem sites of Bari, Rome and Taranto, in the period between 1 August and 31 December 2023, no waste was segregated;
- moreover, with a view to containing waste production, the Company continued, also during 2023, to use desktop virtualization systems (VDI) with respect to the purchase of local PCs, and the consequent reduction of electrical equipment to be disposed of;
- in order to improve the conditions of the waste storage area at the Sa Illetta site, special protective tarpaulins were used to prevent any leakage of particulate matter and protect the soil.

### Control and reduction of atmospheric emissions (dust, air pollutants)

During 2023, Tiscali Italia S.p.A. carried out routine maintenance and transmitted data to the FGAS database, in accordance with legal frequencies, relating to leakage checks on equipment containing fluorinated greenhouse gases. In addition, the maintenance of the qualification requirements of the company SIGIT SRL, which was entrusted with the management of equipment containing FGAS, was verified.

Concerning the exhaust gas emissions of the company’s vehicles in the year 2023, it should be noted that despite the increase in the number of cars following the merger with the Linkem Retail

Unit (from 54 to 58 units), the company has taken steps to reduce the use of diesel-powered vehicles by replacing them with petrol-powered vehicles, helping to offset the increase in exhaust gas emissions and thus demonstrating its commitment to promoting sustainable practices.

### **Containment of noise immissions**

With regard to Tiscali Italia S.p.A.'s phonometric report, it should be noted that no changes were found with respect to the previous year's report. The report, prepared by a competent technician (appointed in March 2021), showed a sound immission level below the limits set by the regulations for the area in which the Sa Illetta Campus is located, which is classified as Class II for areas of predominantly residential use. It is important to emphasize that the impact of the sound source on receptors has been further mitigated thanks to the installation of the new Chillers.

### **Containment of releases to soil from farm activities**

During the year 2023, there were no incidents of spillage of pollutants from the tanks used for the gensets, thanks to the implementation of daily checks and the training of personnel on the correct use of the "Emergency Spill Kit". In addition, the list of hazardous substances and preparations in use in the company was updated by collecting the corresponding safety data sheets.

### **Containment of water consumption**

With regard to the use of water resources, in 2023 Tiscali Italia S.p.A.'s industrial water consumption amounted to 6,390 cubic meters, while drinking water consumption stood at 17,850 cubic meters. Water consumption levels are constantly monitored through readings from supplier bills. With regard to the Taranto and Bari sites, in the months from January to December 2023, water consumption amounted to 1,136 m<sup>3</sup> and 1,014 m<sup>3</sup> respectively.

### **Distribution, use and end of life of products**

In order to make its customers aware of the issue of sustainability, Tiscali Italia S.p.A. has drawn up a communication on the disposal of WEEE to be included in the Welcome Pack intended for Business customers. This communication aims to provide information on the potential environmental impacts associated with the use and end-of-life of products, providing for the return of modems on loan in the event of contract termination or replacement, as well as the correct disposal of products in accordance with municipal waste management regulations.

### **Protection of environmental impact with regard to the use of indoor parking spaces**

Aware that human activities have an increasing influence on the Earth's climate and temperature, fueling the greenhouse effect and global warming, and also considering the great naturalistic value of the area in which the Cagliari head office is located, the Company takes special care of the Sa Illetta wetland, implementing all precautions and actions aimed at preserving its beauty and ecosystem. With this in mind, Tiscali Italia S.p.A. is committed to safeguarding the environment by planning its activities in a continuous search for balance between infrastructure development and environmental protection. Related to this is the commitment to promoting environmental sustainability, monitoring the risks to the environment and the local community arising from the performance of its activities and, for the most significant impacts, implementing policies and projects to improve and mitigate these risks.

An "Environmental Analysis" was carried out to identify and assess the direct and indirect environmental impacts arising from its activities, which led to the definition of organisational rules for the reduction and control of these impacts. This analysis considered both direct aspects,



i.e. those over which the Company exercises total management control, and indirect aspects, i.e. aspects originating from activities over which Tiscali cannot implement complete management control. Indirect environmental aspects and impacts include certain staff activities, in particular impacts on the soil and subsoil deriving from possible leaks of oil, fuel and other pollutants that may be conveyed into the soil and therefore into the subsoil by private staff cars parked in parking areas in natural soil, not protected by cement screed or bituminous conglomerate. To this end, an awareness-raising campaign has been launched, aimed at all personnel so that they pay attention to maintaining their cars in good working order, with particular attention to ensuring that any contamination of the soil deriving from leaks of lubricating oil, fuel and any polluting substance deriving from them is avoided.

#### **FUTURE OBJECTIVES:**

For 2024, the Group has set as its goal the consolidation of the results achieved in the area of environmental sustainability, ensuring constant compliance with procedures aimed at mitigating the environmental impact generated by its activities. To this end, the possibility of investment and the sustainability of some initiatives are being assessed, such as the revamping of the CRAH system for air-conditioning the data center, and the optimization of the IT infrastructure through the decommissioning of obsolete equipment, virtualization and the adoption of new technologies with lower energy consumption, as well as the replacement of UPSs serving the office system. In addition, with a view to sustainability in the service of corporate mobility, the installation of a number of 22KW electric recharging stations for use by employees is being evaluated.

## 7. Materiality analysis

### Definition of impacts related to material issues

Material Topics for the Tessellis Group	Mapping current and potential positive generated impacts	Mapping current and potential negative generated impacts
<b>INTEGRITY IN BUSINESS CONDUCT</b>	<p>Increased awareness and culture of ethics and anti-corruption among management, employees, business partners and other stakeholders</p> <p>Increased compliance with current anti-corruption regulations, resulting in reduced penalties and improved reputational capital for the organization</p>	<p>Loss of reputation and repercussions on economic sustainability as a result of possible episodes of corruption (both with the public administration and public authorities and among private individuals)</p> <p>Deterioration of relations with institutions (e.g. caused by non-compliance) as a result of episodes characterized by a lack of transparency</p>
<b>SUSTAINABLE SUCCESS AND ECONOMIC PERFORMANCE</b>	<p>Reduction of the risk of negative environmental, social and economic impacts generated by the Group and along the supply chain, with indirect benefits for employees and related communities</p> <p>Direct generation of economic value, protection of business continuity and related distribution of value to stakeholders (e.g. employees, suppliers and shareholders)</p> <p>Risk/opportunity management for mitigation of negative externalities and maximization of positive externalities</p>	<p>Reduced awareness of business risks, including ESG, with consequent impacts on decision-making, business operations and value distribution processes</p> <p>Potential non-compliance with applicable laws, regulations, internal and external sustainability standards in the sector, with associated negative social/environmental/economic consequences</p>
<b>RESPONSIBLE SUPPLY CHAIN MANAGEMENT</b>	<p>Promotion of innovation and research and development along the value chain for the sustainability of the sector</p> <p>Potential improvement of the ESG performance of suppliers and their success, including through social/environmental screening and assessment activities</p> <p>Contribution to the development of the local area in which it operates through redistribution of value along the supply chain</p>	<p>Potential violations of human rights along the value chain (e.g. child labour, forced labour, discrimination, other labour rights, etc.) with impacts on human dignity and community development</p> <p>Increasing direct impacts associated with the supply chain, with particular reference to energy consumption and associated greenhouse gas emissions (Scope 3)</p> <p>Funding to suppliers that do not adopt sustainable practices and are not compliant with environmental requirements</p>

<p><b>ENERGY CONSUMPTION, CLIMATE CHANGE AND OTHER ENVIRONMENTAL IMPACTS</b></p>	<p>Promotion of energy efficiency/ renewable energy initiatives within the organization and related reduction of associated greenhouse gas emissions (direct and indirect emissions Scope 1/ Scope 2)</p> <p>Reduction in associated greenhouse gas emissions (Scope 3 indirect emissions) through the promotion of energy efficiency/renewable energy initiatives along the organization's value chain</p> <p>Optimization and efficiency of energy consumption from business operations</p>	<p>Increased energy consumption (within the organization and along the organization's value chain) and associated greenhouse gas emissions (Scope 1 / Scope 2)</p> <p>Negative impacts associated with non-compliance with industry regulations, including electromagnetic waves</p> <p>Depletion of available resources used by the consumption of non-renewable energy (nonrenewable fuels) for business operations</p>
<p><b>SUSTAINABLE WASTE MANAGEMENT AND CIRCULAR ECONOMY</b></p>	<p>Increased reuse/recycling practices, reduction of waste and proper material disposal (also with reference to relevant regulations on high-tech products)</p>	<p>Impacts related to potential non-compliance with regulations on the disposal of waste and other hazardous substances and/or environmental protection</p>
<p><b>HEALTH AND SAFETY</b></p>	<p>Lower incidence of accidents and occupational diseases within the organization (and/or along the value chain)</p> <p>Increased health and safety awareness of employees and collaborators, through health and safety promotion activities, dedicated training and accurate risk management</p>	<p>Potential for an increase in work-related accidents and occupational diseases, also due to the lack of monitoring and enforcement of health and safety management systems</p> <p>Potential economic losses related to compensation for damages</p>
<p><b>STAFF DEVELOPMENT AND VALORISATION</b></p>	<p>Enhancement of employees' skills through staff training and dissemination of corporate culture to the younger generation</p> <p>Career development of employees and attraction and retention of talent with a view to personnel development</p> <p>Promotion of employees' health and well-being, including through a proper work-life balance</p> <p>Competitive remuneration of workers</p>	<p>Potential implementation of discriminatory practices, with particular reference to responsibilities, compensation and career advancement</p> <p>Direct and indirect negative impacts on business operations and stakeholder expectations as a result of potentially high employee turnover rates, loss of know-how and key competencies</p> <p>Unattractive remuneration for new generations with direct and indirect negative impacts on business continuity and stakeholders' expectations</p>

**PROTECTION OF HUMAN AND LABOUR RIGHTS, DIVERSITY AND EQUAL OPPORTUNITIES**

Promoting an inclusive culture that encourages diversity, fairness and inclusion at all levels within the Group, and that facilitates the expression of everyone’s talent and uniqueness

Promotion of activities aimed at avoiding cases of child or forced labour within the organization and its portfolios

Diversity of employees with direct and indirect impacts on the affirmation of equality

Ensuring the right to free association of the organization’s employees

Potential incidents of discrimination/harassment/abuse

Violation of human rights within the organization and its portfolios, including cases of child or forced labour

Incidents of discrimination/harassment/abuse within company operations

Conflicts with trade unions and failure to respect the right to free association within the organization or along its value chain

**RELATIONS WITH THE TERRITORY AND LOCAL COMMUNITIES**

Contribution to the development of the communities in which the Group operates through compliance with applicable tax regulations

Investments in infrastructure and services supported locally, as well as in social and cultural initiatives that favor inclusiveness

Direct/indirect economic impacts on families and local communities through the generation of professional opportunities (recruitment) and support, in the selection of suppliers, to local businesses

Projects and activities with actual and/or potential impacts on community development and the local business fabric (e.g. environmental, social)

**NETWORK COVERAGE AND QUALITY OF SERVICE**

Impacts related to fair and inclusive social development, including with reference to the most vulnerable categories, through the accessibility of its products or services

Growth in market share and enhancement of corporate reputation with customers

Impacts related to lack of network accessibility, with negative impacts on communities and land development

**DIGITISATION AND TECHNOLOGICAL INNOVATION**

Expansion of all-round strategic opportunities, including in the ESG area

Greater development of the start-up eco-system and entrepreneurship in the sector through business support and development of innovation programmes

Increased product accessibility and adaptation to changing sector trends through creation, conception and development of innovative products and processes (including digitization)

Impacts related to product/service evolution less responsive to market changes and sector trends, obsolescence and research and development activities

**PRIVACY AND DATA SECURITY**

Secure and conscious management of information and data, in line with the needs and expectations of stakeholders, and consistent with applicable legislation

Exposure to cyber-attacks, unauthorized access aimed at extracting or corrupting Group information, which may damage customers' businesses

Potential breaches of customer privacy and loss of customer and/or other stakeholder data

Possible malfunctioning of information systems (including infrastructure and software), with consequent impact on loss of data and information

**TRANSPARENCY, RELIABILITY AND ACCESSIBILITY OF PRODUCTS AND SERVICES**

Increase in the number of customers through increased proximity to customers and development of effective and timely responses to their requests, including through operational simplification

Reduction in sales volume of individual products due to failure to recognize customer expectations, resulting in loss of customers served

Compliance with current regulations in the area of transparency in the telecommunications sector

Increase in complaints and/or poor complaint and customer relationship management

Satisfaction and improved reputation with customers through constant dialogue and the provision of products and services that meet their needs

Dissemination of inaccurate, misleading or deceptive information about the organization or its products

Fair delivery of quality, reliable and accessible content, including in relation to the needs of disabled people and/or vulnerable categories

Contribution to plurality, freedom of expression and publishing, through the development of a wide range of product content, capable of representing the multiplicity of cultures, perspectives and opinions of stakeholders

## 8. European Taxonomy Tables

Share of turnover derived from products or services associated with economic activities aligned with the taxonomy - Disclosure for the year 2023

Financial Year 2023	2023			Criteria for substantial contribution						DNSH criteria ("Do no significant harm")							Share of turnover aligned (A.1) or eligible (A.2) to the taxonomy, year 2022	Enabling activity category	Transition activity category
	Code (a)	Turnover	Share of turnover, year 2023	Climate change mitigation	Adaptation to climate change	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Adaptation to climate change	Water	Pollution	Circular economy	Biodiversity	Minimum Safeguards			
		EUR/000	%	Yes/No N/AM (b)	Yes/No N/AM (b)	Yes/No N/AM (b)	Yes/No N/AM (b)	Yes/No N/AM (b)	Yes/No N/AM (b)	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	A	T
<b>A. ACTIVITIES ELIGIBLE FOR TAXONOMY</b>																			
<b>A.1. Environmentally sustainable activities (aligned with taxonomy)</b>																			
Power generation using photovoltaic solar technology	4.1 (CCM)	0	0%	No	N/AM	N/AM	N/AM	N/AM	N/AM	No	No	No	No	No	No	No	0%	-	-
Preparing for reuse of end-of-life products and components	5.3 (CE)	0	0%	N/AM	N/AM	N/AM	N/AM	No	N/AM	No	No	No	No	No	No	No	0%	-	-
Data processing, hosting and related activities	8.1 (CCM)	0	0%	No	N/AM	N/AM	N/AM	N/AM	N/AM	No	No	No	No	No	No	No	0%	-	T
Programming and broadcasting activities	8.3 (CCA)	0	0%	N/AM	No	N/AM	N/AM	N/AM	N/AM	No	No	No	No	No	No	No	0%	A	-
<b>Turnover of environmentally sustainable activities (aligned to taxonomy) (A.1)</b>		<b>0</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>0%</b>	<b>A</b>	
<b>Of which enabling</b>		<b>0</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>0%</b>	<b>A</b>	
<b>Of which transitional</b>		<b>0</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>0%</b>		<b>T</b>
<b>A.2. Activities eligible for the taxonomy but not environmentally sustainable (activities not aligned with the taxonomy)</b>																			
				AM/AM (c)	AM/AM (c)	AM/AM (c)	AM/AM (c)	AM/AM (c)	AM/AM (c)										
Power generation using photovoltaic solar technology	4.1 (CCM)	0	0%	AM	N/AM	N/AM	N/AM	N/AM	N/AM								0%		
Preparing for reuse of end-of-life products and components	5.3 (CE)	152.7	0.07%	N/AM	N/AM	N/AM	N/AM	AM	N/AM								N/A		
Data processing, hosting and related activities	8.1 (CCM)	1,182.7	0.51%	AM	N/AM	N/AM	N/AM	N/AM	N/AM								0.86%		
Programming and broadcasting activities	8.3 (CCA)	0	0%	N/AM	AM	N/AM	N/AM	N/AM	N/AM								0%		
<b>Turnover from activities eligible for the taxonomy but not environmentally sustainable (activities not aligned with the taxonomy) (A.2)</b>		<b>1,335.4</b>	<b>0.58%</b>	<b>89%</b>	<b>0%</b>	<b>-</b>	<b>-</b>	<b>11%</b>	<b>-</b>								<b>0.86%</b>		
<b>A. Turnover of activities eligible for the taxonomy (A.1+A.2)</b>		<b>1,335.4</b>	<b>0.58%</b>	<b>89%</b>	<b>0%</b>	<b>-</b>	<b>-</b>	<b>11%</b>	<b>-</b>								<b>0.86%</b>		
<b>B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY</b>																			
<b>Turnover of activities not eligible for taxonomy</b>		<b>230,258.7</b>	<b>99.42%</b>																
<b>TOTAL</b>		<b>231,621.1</b>	<b>100%</b>																

	Share of turnover/Total turnover	
	Target-aligned activities	Eligible Activities by Objective
CCM	0%	0.51%
CCA	0%	0%
WTR	0%	0%
CE	0%	0.07%
PPC	0%	0%
BIO	0%	0%

(a) The code contains the abbreviation of the objective to which the economic activity can make a substantial contribution, and the section number of the activity in the corresponding annex of the objective, i.e. Climate Change Mitigation (CCM); Climate Change Adaptation (CCA); Water and Marine Resources (WTR); Circular Economy (CE); Pollution Prevention and Control (PPC); Biodiversity and Ecosystems (BIO).

(b) Yes - Activity is eligible for taxonomy and aligned to the taxonomy with respect to the relevant environmental objective; No - Activity is eligible for taxonomy but not aligned to the taxonomy with respect to the relevant environmental objective; N/AM - Not eligible; Activity is not eligible for taxonomy with respect to the relevant objective.

(c) AM - Activity eligible for the taxonomy for the relevant objective; N/AM - Activity not eligible for the taxonomy for the relevant objective

Share of capital expenditure (CapEx) resulting from products or services associated with economic activities aligned with the taxonomy - Disclosure for the year 2023

Financial Year 2023	2023			Criteria for substantial contribution						DNSH criteria ("do no significant harm")						Minimum Safeguards	Share of CapEx aligned (A.1.) or eligible (A.2.) to taxonomy, year 2022	Enabling activity category	Transition activity category
	Code (a)	CapEx	Share of CapEx, year 2023	Climate change mitigation	Adaptation to climate change	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Adaptation to climate change	Water	Pollution	Circular economy	Biodiversity				
		EUR/000	%	Yes/No/N/AM (b)	Yes/No/N/AM (b)	Yes/No/N/AM (b)	Yes/No/N/AM (b)	Yes/No/N/AM (b)	Yes/No/N/AM (b)	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	A	T
<b>B. ACTIVITIES ELIGIBLE FOR TAXONOMY</b>																			
<b>A.1 Environmentally sustainable activities (aligned with taxonomy)</b>																			
Power generation using photovoltaic solar technology	4.1 (CCM)	0	0%	No	N/AM	N/AM	N/AM	N/AM	N/AM	No	No	No	No	No	No	No	0%	-	-
Preparing for reuse of end-of-life products and components	5.3 (CE)	0	0%	N/AM	N/AM	N/AM	N/AM	No	N/AM	No	No	No	No	No	No	No	0%	-	-
Data processing, hosting and related activities	8.1 (CCM)	0	0%	No	N/AM	N/AM	N/AM	N/AM	N/AM	No	No	No	No	No	No	No	0%	-	T
Programming and broadcasting activities	8.3 (CCA)	0	0%	N/AM	No	N/AM	N/AM	N/AM	N/AM	No	No	No	No	No	No	No	0%	A	-
<b>CapEx of environmentally sustainable activities (aligned to taxonomy) (A.1)</b>		<b>0</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>0%</b>		
<b>Of which enabling</b>		<b>0</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>0%</b>	<b>A</b>	
<b>Of which transitional</b>		<b>0</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>0%</b>		<b>T</b>
<b>A.2 Activities eligible for the taxonomy but not environmentally sustainable (activities not aligned with the taxonomy)</b>																			
				AM/ N/AM (c)	AM/ N/AM (c)	AM/ N/AM (c)	AM/ N/AM (c)	AM/ N/AM (c)	AM/ N/AM (c)										
Power generation using photovoltaic solar technology	4.1 (CCM)	0	0%	AM	N/AM	N/AM	N/AM	N/AM	N/AM								0%		
Preparing for reuse of end-of-life products and components	5.3 (CE)	0	0%	N/AM	N/AM	N/AM	N/AM	AM	N/AM								N/A		
Data processing, hosting and related activities	8.1 (CCM)	0	0%	AM	N/AM	N/AM	N/AM	N/AM	N/AM								0%		
Programming and broadcasting activities	8.3 (CCA)	0	0%	N/AM	AM	N/AM	N/AM	N/AM	N/AM								0%		
<b>CapEx of activities eligible for the taxonomy but not environmentally sustainable (activities not aligned with the taxonomy) (A.2)</b>		<b>0</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>-</b>	<b>-</b>	<b>0%</b>	<b>-</b>								<b>0%</b>		
<b>B. CapEx of activities eligible for taxonomy (A.1+A.2)</b>		<b>0</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>-</b>	<b>-</b>	<b>0%</b>	<b>-</b>								<b>0%</b>		
<b>B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY</b>																			
<b>CapEx of activities not eligible for taxonomy</b>		50,690.3	<b>100%</b>																
<b>TOTAL</b>		50,690.3	<b>100%</b>																

	Share of CapEx/Total CapEx	
	Target-aligned activities	Eligible Activities by Objective
CCM	0%	0%
CCA	0%	0%
WTR	0%	0%
CE	0%	0%
PPC	0%	0%
BIO	0%	0%

(a) The code contains the abbreviation of the objective to which the economic activity can make a substantial contribution, and the section number of the activity in the corresponding annex of the objective, i.e. Climate Change Mitigation (CCM); Climate Change Adaptation (CCA); Water and Marine Resources (WTR); Circular Economy (CE); Pollution Prevention and Control (PPC); Biodiversity and Ecosystems (BIO).  
 (b) Yes - Activity is eligible for taxonomy and aligned to the taxonomy with respect to the relevant environmental objective; No - Activity is eligible for taxonomy but not aligned to the taxonomy with respect to the relevant environmental objective; N/AM - Not eligible; Activity is not eligible for taxonomy with respect to the relevant objective.  
 (c) AM - Activity eligible for the taxonomy for the relevant objective; N/AM - Activity not eligible for the taxonomy for the relevant objective

Share of operating expenses (OpEx) from products or services associated with economic activities aligned with the taxonomy – Disclosure for the year 2023

Financial Year 2023	2023			Criteria for substantial contribution						DNSH criteria (“do no significant harm”)						Share of OpEx aligned (A.1.) or eligible (A.2.) to taxonomy, year 2022	Enabling activity category	Transition activity category	
	Code (a)	OpEx	Share of OpEx, year 2023	Climate change mitigation	Adaptation to climate change	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Adaptation to climate change	Water	Pollution	Circular economy	Biodiversità				Minimum Safeguards
		EUR/000	%	Yes/No N/AM (b)	Yes/No N/AM (b)	Yes/No N/AM (b)	Yes/No N/AM (b)	Yes/No N/AM (b)	Yes/No N/AM (b)	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	Yes/No	%	A	T
<b>C. ACTIVITIES ELIGIBLE FOR TAXONOMY</b>																			
<b>A.1. Attività ecosostenibili (allineate alla tassonomia)</b>																			
Power generation using photovoltaic solar technology	4.1 (CCM)	0	0%	No	N/AM	N/AM	N/AM	N/AM	N/AM	No	No	No	No	No	No	No	0%	-	-
Preparing for reuse of end-of-life products and components	5.3 (CE)	0	0%	N/AM	N/AM	N/AM	N/AM	No	N/AM	No	No	No	No	No	No	No	0%	-	-
Data processing, hosting and related activities	8.1 (CCM)	0	0%	No	N/AM	N/AM	N/AM	N/AM	N/AM	No	No	No	No	No	No	No	0%	-	T
Programming and broadcasting activities	8.3 (CCA)	0	0%	N/AM	No	N/AM	N/AM	N/AM	N/AM	No	No	No	No	No	No	No	0%	A	-
<b>OpEx of environmentally sustainable activities (aligned to taxonomy) (A.1)</b>		<b>0</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>0%</b>	<b>A</b>	<b>-</b>
<b>Of which enabling</b>		<b>0</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>0%</b>	<b>A</b>	<b>-</b>
<b>Of which transitional</b>		<b>0</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>0%</b>	<b>-</b>	<b>T</b>
<b>A.2. Activities eligible for the taxonomy but not environmentally sustainable (activities not aligned with the taxonomy)</b>																			
Power generation using solar technology	4.1 (CCM)	74	1.9%	AM/AM (c)	AM/AM (c)	AM/AM (c)	AM/AM (c)	AM/AM (c)	AM/AM (c)								1.7%		
Preparing for reuse of end-of-life products and components	5.3 (CE)	0	0%	N/AM	N/AM	N/AM	N/AM	AM	N/AM								N/A		
Data processing, hosting and related activities	8.1 (CCM)	19.6	0.5%	AM	N/AM	N/AM	N/AM	N/AM	N/AM								0.86%		
Programming and broadcasting activities	8.3 (CCA)	355.4	9.2%	N/AM	AM	N/AM	N/AM	N/AM	N/AM								7.0%		
<b>OpEx of activities eligible for the taxonomy but not environmentally sustainable (activities not aligned with the taxonomy) (A.2)</b>		<b>449</b>	<b>11.68%</b>	<b>21%</b>	<b>79%</b>	<b>-</b>	<b>-</b>	<b>0%</b>	<b>-</b>								<b>9.6%</b>		
<b>C. OpEx of activities eligible for taxonomy (A.1+A.2)</b>		<b>449</b>	<b>11.68%</b>	<b>21%</b>	<b>79%</b>	<b>-</b>	<b>-</b>	<b>0%</b>	<b>-</b>								<b>9.6%</b>		
<b>B. ACTIVITIES NOT ELIGIBLE FOR TAXONOMY</b>																			
<b>OpEx of activities not eligible for taxonomy</b>		<b>3,420.6</b>	<b>88.32%</b>																
<b>TOTAL</b>		<b>3,844.7</b>	<b>100%</b>																

	Share of OpEx/Total OpEx	
	Target-aligned activities	Eligible Activities by Objective
CCM	0%	2.4%
CCA	0%	9.2%
WTR	0%	0%
CE	0%	0%
PPC	0%	0%
BIO	0%	0%

(a) The code contains the abbreviation of the objective to which the economic activity can make a substantial contribution, and the section number of the activity in the corresponding annex of the objective, i.e. Climate Change Mitigation (CCM); Climate Change Adaptation (CCA); Water and Marine Resources (WTR); Circular Economy (CE); Pollution Prevention and Control (PPC); Biodiversity and Ecosystems (BIO).  
 (b) Yes - Activity is eligible for taxonomy and aligned to the taxonomy with respect to the relevant environmental objective; No - Activity is eligible for taxonomy but not aligned to the taxonomy with respect to the relevant environmental objective; N/AM - Not eligible; Activity is not eligible for taxonomy with respect to the relevant objective.  
 (c) AM - Activity eligible for the taxonomy for the relevant objective; N/AM - Activity not eligible for the taxonomy for the relevant objective



## 9. GRI Content Index

Declaration of Use	The Tessellis Group has produced this Non-Financial Statement in accordance with GRI Standards for the period 01 January 2023 to 31 December 2023.
GRI 1 used	GRI 1: Reporting Principles (2021)
Applicable GRI Standards	N/A

GRI Standard	Information	Chapter and/or paragraph of reference	Page	Omission	GRI SECTOR STANDARD No.	
				Requirement omitted	Reason	Explanation
GENERAL DISCLOSURES						
GRI 2: General Disclosure (2021)	2-1 Organisational Details	Methodological Note 2023 Annual Financial Report	Page 10			
	2-2 Entities included in the organization's sustainability reporting	Methodological Note	Page 10			
	2-3 Reporting Period, Frequency and Contacts	Methodological Note	Page 11			
	2-4 Review of Information	Methodological Note	Pages 49-51, 53, 60, 72-73, 75			
	2-5 External Assurance	Methodological Note 10 - Auditor's Report	Page 11			
	2-6 Activities, Value Chain and Other Business Relationships	1 - Tessellis Group: profile, mission and values	Page 12-17			
	2-7 Employees	5.3 - Staff composition and equal opportunities	Pages 13, 49-51			
	2-8 Non-employees	5.3 - Staff composition and equal opportunities	Page 49			
	2-9 Governance Structure and Composition	2.1 - Governance  The additional information required is published in the document "Report on Corporate Governance and Ownership Structure 2023", in section 1.1 "Issuer Profile"	Page 18-20			
	2-10 Appointment and selection of the highest governing body	The required information is published in the document "Report on Corporate Governance and Ownership Structure 2023", in section 1.2 "Information on Ownership Structure" as of 31 December 2023, under Appointment of the Board of Directors				

2-11 President of the highest governing body	The required information is published in the document "Report on Corporate Governance and Ownership Structure 2023", in section 1.2 "Information on Ownership Structure" as of 31 December 2023				
2-12 Role of the highest governing body in impact management control	<p>2.1 - Governance</p> <p>2.2 - Internal Audit System and Risk Management</p> <p>The additional information required is published in the document "Report on Corporate Governance and Ownership Structures 2023", in section 1.4 "Board of Directors", under "Role and Functioning of the Board of Directors"</p>	Page 18-24			
2-13 Delegation of Responsibility for Impact Management	The required information is published in the document "Report on Corporate Governance and Ownership 2023", in section 1.4 "Board of Directors", under the section "Role and Functioning of the Board of Directors" and in section 1.9 "Internal Audit and Risk Management System - Audit and Risk Committee"				
2-14 Role of the Highest Governance Body in Sustainability Reporting	<p>2.5 - Stakeholder mapping and materiality analysis</p> <p>The additional information required is published in the document "Report on Corporate Governance and Ownership 2023", in section 1.4 "Board of Directors", under the section "Role and Functioning of the Board of Directors"</p>	Page 30-32			
2-15 Conflicts of Interest	The required information is published in the document "Report on Corporate Governance and Ownership Structures 2023", in section 1.4 "Board of Directors", under the section "Role and Functioning of the Board of Directors" and paragraph 1.10 "Directors' Interests and Related Party Transactions"				
2-16 Communication of Critical Issues	<p>2.2 - Internal Audit System and Risk Management</p> <p>Organization, management and control model pursuant to Legislative Decree no. 231/2001</p>	Page 21-23			
2-17 Collective knowledge of the highest governing body	2.1 - Governance, under the section "Board of Directors"	Page 18-19			

2-18 Performance evaluation of the highest governing body	The required information is published in the document "Report on Corporate Governance and Ownership 2023", in section 1.7 "Composition and functioning of the Appointments and Remuneration Committee"				
2-19 Remuneration Policies	The required information is published in the document "Report on Corporate Governance and Ownership Structures 2023", in section 1.7 "Composition and Functioning of the Appointments and Remuneration Committee", and in the document "Report on Remuneration Policy and Remuneration Paid 2023", paragraph 4 "Structure of Remuneration"				
2-20 Process for determining remuneration	The required information is published in the document "Report on Remuneration Policy and Compensation Paid 2023" under paragraph 4 "Structure of Remuneration".				
2-21 Total annual salary ratio	5. People, under the section "Equal treatment and remuneration"	Page 54			
2-22 Sustainable Development Strategy Statement	CEO's letter to the Stakeholders	Page 7-9			
2-23 Policy Commitments	2.2 - Internal Audit System and Risk Management, the Diversity Policy section  The additional information required is published in the Engagement Policy towards shareholders and stakeholders, the Code of Ethics and the Organisational Model	Pages 22, 24			

	2-24 Integration of policy commitments	The required information is published in the document "Report on Corporate Governance and Ownership 2023", in section 1.4 "Board of Directors", under the section "Role and Functioning of the Board of Directors" and in section 1.9 "Internal Audit and Risk Management System - Audit and Risk Committee"			
	2-25 Processes to Remedy Negative Impacts	2.5 - Stakeholder mapping and materiality analysis  7 - Materiality analysis - Definition of impacts related to material topics  2.2 - Internal Audit System and Risk Management  2.6 - Key sustainability risks  The additional information required is published in the document "Report on Corporate Governance and Ownership 2023", in section 1.9 "Internal Audit System and Risk Management" under "Audit and Risk Committee"	Pages 30-34, 82-85		
	2-26 Mechanisms for requesting	2.2 - Internal Audit System and Risk Management  Organization, management and control model pursuant to Legislative Decree no. 231/2001	Page 20-24		
	2-27 Compliance with Laws and Regulations	2.2 - Internal Audit System and Risk Management, under "Combating Active and Passive Corruption"	Page 22		
	2-28 Membership of associations	2.3 - The Regulatory and Competitive Environment	Page 24-27		
	2-29 Approach to stakeholder engagement	2.5 - Stakeholder Mapping and Materiality Analysis	Page 30		
	2-30 Collective Bargaining Agreements	5.3 - Staff Composition and Equal Opportunities, under "CCNL"	Page 52		
<b>MATERIAL TOPICS</b>					
GRI 3: Material Topics (2021)	3-1 Process for determining material topics	2.5 - Stakeholder Mapping and Materiality Analysis	Page 30		
	3-2 List of Material Topics	2.5 - Stakeholder mapping and materiality analysis  7 - Definition of impacts related to material topics	Pages 32, 82-85		

Material topic: Sustainable success and economic performance						
GRI 3: Material Topics (2021)	3-3 Management of Material Topics	2.7 - Economic value directly generated and distributed	Page 35			
GRI 201 - Economic Performance 2016	201-1 Economic value directly generated and distributed (2016)	2.7 - Economic value directly generated and distributed	Page 35-36			
Material topic: Relations with the territory and local communities						
GRI 3: Material Topics (2021)	3-3 Management of Material Topics	3.1 - Expanding Network Coverage and Product Accessibility	Page 39-40			
GRI 203 - Indirect Economic Impacts (2016)	203-2 Significant Indirect Economic Impacts	3.1 - Expanding Network Coverage and Product Accessibility	Page 40			
Material Topic: Responsible Supply Chain Management						
GRI 3: Material Topics (2021)	3-3 Management of Material Topics	2.8 - Supply Chain	Page 36-38			
GRI 204 - Procurement Practices (2016)	204-1 Proportion of expenditure to local	2.8 - Supply Chain	Page 38			
Material topic: Integrity in business conduct						
GRI 3: Material Topics (2021)	3-3 Management of Material Topics	2.2 - Internal Audit System and Risk Management	Page 20-24			
GRI 205 - Anti-Corruption (2016)	205-3 Established incidents of corruption and actions taken	2.2 - Internal Audit System and Risk Management, under "Combating Active and Passive Corruption"	Page 22			
GRI 206 - Anti-competitive behavior (2016)	206-1 Anti-competitive Behavior	2.3 - The Regulatory and Competitive Context under the section "Relations with AGCOM and AGCM"	Page 25			
GRI 207 - Taxes (2019)	207-1 Approach to Taxes	2.2 - Internal Audit System and Risk Management, section "Company Tax Policy"	Page 23			
Material topic: Energy consumption, climate change and other environmental impacts						
GRI 3: Material Topics (2021)	3-3 Management of Material Topics	6.3 - Energy consumption and CO2 emissions 6 - The environmental impact 6.5 - Actions taken in 2023 impacting on environmental sustainability and new perspectives	Pages 70-74, 79-81			
GRI 302 - Energía (2016)	302-1 Energy consumed within	6.3 - Energy consumption and CO2 emissions 6.4 - Energy efficiency initiatives	Page 71-78			

GRI 305 - Emissions (2016)	305-1 Indirect GHG emissions (Scope 1)	6.3 - Energy consumption and CO <sub>2</sub> emissions	Page 73		
	305-2 Indirect GHG emissions from energy consumption (Scope 2)	6.3 - Energy consumption and CO <sub>2</sub> emissions	Page 73-74		
Material topic: Staff development and enhancement					
GRI 3: Material Topics (2021)	3-3 Management of Material Topics		Pages 45-49, 55-56		
GRI 401 - Employment (2016)	401-1 New recruitments and turnover	5.3 - Staff composition and equal opportunities	Page 51		
	401-3 Parental Leave	5.3 - Staff composition and equal opportunities	Page 53		
GRI 404 - Training and education	404-1 Average hours of training per employee per year	5.4 - Training	Page 56		
Material topic: Health and safety					
GRI 3: Material Topics (2021)	3-3 Management of Material Topics		Pages 29, 59-60		
GRI 403 - Health and Safety at Work (2018)	403-1 - Occupational Health and Safety Management System	5.6 - Workers' health and safety	Page 59		
	403-2 - Hazard Identification, Risk Assessment and Accident Investigation	5.6 - Workers' health and safety	Page 59		
	403-3 - Occupational health services	5.6 - Workers' health and safety	Page 59		
	403-4 - Worker participation and consultation and communication on health and safety at work	5.6 - Workers' health and safety	Page 59		
	403-5 - Workers' health and safety training	5.6 - Workers' health and safety	Page 29-59		
	403-6 - Health Promotion of workers	5.6 - Workers' health and safety	Page 59-60		
	403-7 - Prevention and mitigation of occupational health and safety impacts within business relationships	5.6 - Workers' health and safety	Page 59-60		
	403-9 Accidents at work	5.6 - Workers' health and safety	Page 60		
	403-10 Occupational Diseases	5.6 - Workers' health and safety	Page 60		
	Material topic: Protection of human and labour rights, diversity and equal opportunities				
GRI 3: Material Topics (2021)	3-3 Management of Material Topics	2.2 - Internal Audit System and Risk Management, under the section "Diversity Policy"	Pages 23-24, 47, 53-54		
GRI 405 - Diversity and Equal Opportunities (2016)	405-1 Diversity in governing bodies and among employees	2.1 - Governance, under the section "Board of Directors" section 5.2 - Diversity and inclusion 5.3 - Staff composition and equal opportunities	Pages 18, 51-52		

GRI 406 - Non-discrimination (2016)	406-1 Incidents of discrimination and corrective measures taken	5.3 - Staff Composition and Equal Opportunities	Page 53		
Material topic: Privacy and data security					
GRI 3: Material Topics (2021)	3-3 Management of Material Topics	4.3 - Customer Data Protection and the European Privacy Regulation	Pages 27-28, 42-43		
GRI 418 - Customer privacy (2016)	418-1 Proven complaints regarding breaches of customer privacy and loss of customer data	4.3 - Customer data protection and the European Data Protection Regulation, under the section "Relationship with Data Protection Authority"	Page 43		
Material topic: Transparency, accountability and responsible marketing					
GRI 3: Material Topics (2021)	3-3 Management of Material Topics	4.1 - Sales Offer and Responsible Marketing 4.4 - Service Channels	Pages 41-42, 44		
Material topic: Network coverage and quality of service					
GRI 3: Material Topics (2021)	3-3 Management of Material Topics	3.1 - Expansion of network coverage and product accessibility 4.2 Customer satisfaction	Page 39-42		
Material topic: Digitisation and technological innovation					
GRI 3: Material Topics (2021)	3-3 Management of Material Topics	3.1 - Expanding Network Coverage and Product Accessibility	Page 39-40		
Topic: Sustainable waste management and circular economy					
GRI 3: Material Topics (2021)	3-3 Management of Material Topics	6 - Environmental Impact 6.5 - Actions undertaken in 2022 impacting on environmental sustainability and new perspectives	Pages 67, 79-81		

**RELAZIONE DELLA SOCIETÀ DI REVISIONE INDIPENDENTE  
SULLA DICHIARAZIONE CONSOLIDATA DI CARATTERE NON FINANZIARIO  
AI SENSI DELL'ART. 3, C. 10, D.LGS. 254/2016 E DELL'ART. 5 REGOLAMENTO CONSOB  
ADOTTATO CON DELIBERA N. 20267 DEL GENNAIO 2018**

**Al Consiglio di Amministrazione di  
Tessellis S.p.A.**

Ai sensi dell'articolo 3, comma 10, del Decreto Legislativo 30 dicembre 2016, n. 254 (di seguito "Decreto") e dell'articolo 5, comma 1, lett. g) del Regolamento CONSOB n. 20267/2018, siamo stati incaricati di effettuare l'esame limitato ("*limited assurance engagement*") della dichiarazione consolidata di carattere non finanziario della Tessellis S.p.A. e sue controllate (di seguito "Gruppo Tessellis" o "Gruppo") relativa all'esercizio chiuso al 31 dicembre 2023 predisposta ex art. 4 del Decreto, approvata dal Consiglio di Amministrazione in data 7 maggio 2024 (di seguito "DNF").

L'esame limitato da noi svolto non si estende alle informazioni contenute nel paragrafo "Tassonomia UE delle attività economiche sostenibili" della DNF, richieste dall'art. 8 del Regolamento europeo 2020/852.

**Responsabilità degli Amministratori e del Collegio Sindacale per la DNF**

Gli Amministratori sono responsabili per la redazione della DNF in conformità a quanto richiesto dagli articoli 3 e 4 del Decreto e ai "*Global Reporting Initiative Sustainability Reporting Standards*" definiti dal GRI - *Global Reporting Initiative* ("GRI Standards"), da essi individuati come standard di rendicontazione.

Gli Amministratori sono altresì responsabili, nei termini previsti dalla legge, per quella parte del controllo interno da essi ritenuta necessaria al fine di consentire la redazione di una DNF che non contenga errori significativi dovuti a frodi o a comportamenti o eventi non intenzionali.

Gli Amministratori sono responsabili inoltre per l'individuazione del contenuto della DNF, nell'ambito dei temi menzionati nell'articolo 3, comma 1, del Decreto, tenuto conto delle attività e delle caratteristiche del Gruppo e nella misura necessaria ad assicurare la comprensione dell'attività del Gruppo, del suo andamento, dei suoi risultati e dell'impatto dallo stesso prodotti.

Gli Amministratori sono infine responsabili per la definizione del modello aziendale di gestione e organizzazione dell'attività del Gruppo, nonché, con riferimento ai temi individuati e riportati nella DNF, per le politiche praticate dal Gruppo e per l'individuazione e la gestione dei rischi generati o subiti dallo stesso.

Il Collegio Sindacale ha la responsabilità della vigilanza, nei termini previsti dalla legge, sull'osservanza delle disposizioni stabilite nel Decreto.



### **Indipendenza della società di revisione e controllo della qualità**

Siamo indipendenti in conformità ai principi in materia di etica e di indipendenza dell'*International Code of Ethics for Professional Accountants (including International Independence Standards)* (IESBA Code) emesso dall'*International Ethics Standards Board for Accountants*, basato su principi fondamentali di integrità, obiettività, competenza e diligenza professionale, riservatezza e comportamento professionale.

Nell'esercizio di riferimento del presente incarico la nostra società di revisione ha applicato l'*International Standard on Quality Control 1* (ISQC Italia 1) e, di conseguenza, ha mantenuto un sistema di controllo qualità che include direttive e procedure documentate sulla conformità ai principi etici, ai principi professionali e alle disposizioni di legge e dei regolamenti applicabili.

### **Responsabilità della società di revisione**

È nostra la responsabilità di esprimere, sulla base delle procedure svolte, una conclusione circa la conformità della DNF rispetto a quanto richiesto dal Decreto e dai GRI standard. Il nostro lavoro è stato svolto secondo quanto previsto dal principio "*International Standard on Assurance Engagements ISAE 3000 (Revised) - Assurance Engagements Other than Audits or Reviews of Historical Financial Information*" (di seguito "*ISAE 3000 Revised*"), emanato dall'*International Auditing and Assurance Standards Board* (IAASB) per gli incarichi *limited assurance*. Tale principio richiede la pianificazione e lo svolgimento di procedure al fine di acquisire un livello di sicurezza limitato che la DNF non contenga errori significativi. Pertanto, il nostro esame ha comportato un'estensione di lavoro inferiore a quella necessaria per lo svolgimento di un esame completo secondo l'*ISAE 3000 Revised* ("*reasonable assurance engagement*") e, conseguentemente, non ci consente di avere la sicurezza di essere venuti a conoscenza di tutti i fatti e le circostanze significativi che potrebbero essere identificati con lo svolgimento di tale esame.

Le procedure svolte sulla DNF si sono basate sul nostro giudizio professionale e hanno compreso colloqui, prevalentemente con il personale della società responsabile per la predisposizione delle informazioni presentate nella DNF, nonché analisi di documenti, ricalcoli ed altre procedure volte all'acquisizione di evidenze ritenute utili.

In particolare, abbiamo svolto le seguenti procedure:

1. analisi dei temi rilevanti in relazione alle attività e alle caratteristiche del Gruppo rendicontati nella DNF, al fine di valutare la ragionevolezza del processo di selezione seguito alla luce di quanto previsto dall'art. 3 del Decreto e tenendo presente lo standard di rendicontazione utilizzato;
2. analisi e valutazione dei criteri di identificazione del perimetro di consolidamento, al fine di riscontrarne la conformità a quanto previsto dal Decreto;
3. comparazione tra i dati e le informazioni di carattere economico-finanziario inclusi nella DNF e i dati e le informazioni inclusi nel Bilancio Consolidato del Gruppo Tessellis;

4. comprensione dei seguenti aspetti:

- modello aziendale di gestione e organizzazione dell'attività del Gruppo, con riferimento alla gestione dei temi indicati nell'art. 3 del Decreto;
- politiche praticate dall'impresa connesse ai temi indicati nell'art. 3 del Decreto, risultati conseguiti e relativi indicatori fondamentali di prestazione;
- principali rischi, generati o subiti connessi ai temi indicati nell'art. 3 del Decreto.

Relativamente a tali aspetti sono stati effettuati inoltre i riscontri con le informazioni contenute nella DNF ed effettuate le verifiche descritte nel successivo punto 5, lett. a);

5. comprensione dei processi che sottendono alla generazione, rilevazione e gestione delle informazioni qualitative e quantitative significative incluse nella DNF.

In particolare, abbiamo svolto interviste e discussioni con il personale della Direzione della Tessellis S.p.A. e abbiamo svolto limitate verifiche documentali, al fine di raccogliere informazioni circa i processi e le procedure che supportano la raccolta, l'aggregazione, l'elaborazione e la trasmissione dei dati e delle informazioni di carattere non finanziario alla funzione responsabile della predisposizione della DNF.

Inoltre, per le informazioni significative, tenuto conto delle attività e delle caratteristiche del Gruppo:

- a livello di gruppo e società controllate:
  - a) con riferimento alle informazioni qualitative contenute nella DNF, e in particolare a modello aziendale, politiche praticate e principali rischi, abbiamo effettuato interviste e acquisito documentazione di supporto per verificarne la coerenza con le evidenze disponibili;
  - b) con riferimento alle informazioni quantitative, abbiamo svolto sia procedure analitiche che limitate verifiche per accertare su base campionaria la corretta aggregazione dei dati.
- per Tessellis Italia S.p.A., che abbiamo selezionato sulla base delle sue attività, del loro contributo agli indicatori di prestazione a livello consolidato e della loro ubicazione, abbiamo effettuato riunioni da remoto nel corso delle quali ci siamo confrontati con i responsabili e abbiamo acquisito riscontri documentali circa la corretta applicazione delle procedure e dei metodi di calcolo utilizzati per gli indicatori.

**Conclusioni**

Sulla base del lavoro svolto, non sono pervenuti alla nostra attenzione elementi che ci facciano ritenere che la DNF del Gruppo Tessellis relativa all'esercizio chiuso al 31 dicembre 2023 non sia stata redatta, in tutti gli aspetti significativi, in conformità a quanto richiesto dagli articoli 3 e 4 del Decreto e dai GRI Standards.

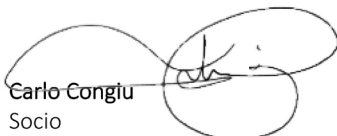
**Deloitte.**

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Le nostre conclusioni sulla DNF del Gruppo Tessellis non si estendono alle informazioni contenute nel paragrafo “Tassonomia UE delle attività economiche sostenibili” della stessa, richieste dall’art. 8 del Regolamento europeo 2020/852.

DELOITTE & TOUCHE S.p.A.

Carlo Congiu  
Socio



Cagliari, 24 maggio 2024

Cagliari, 7 May 2024

The CEO

Davide Rota

A handwritten signature in black ink, appearing to be 'D. Rota'.

The Officer in Charge of Preparing  
the Company's Accounting Documents

Fabio Bartoloni

A handwritten signature in black ink, reading 'Fabio Bartoloni'.