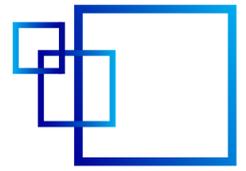




# Sustainable Supply Chain Policy

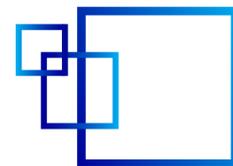
December 2022



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## Together now for a sustainable future

### 1. Introduction

Rai Way S.p.A. ("Rai Way" or "the Company") is a leader in the broadcasting infrastructure sector, offering tower rental and integrated network services to broadcasters, telecommunications operators, private companies and public administration.

Considering developments in the markets in which it operates and more general ethical, social and environmental considerations, the Company has defined the commitments and implementation principles it intends to follow and develop to ensure sustainable, responsible management of its activities in the long term.

In particular, Rai Way's sustainability strategy, inspired by the Sustainable Development Goals ("SDGs") and the principles of the United Nations Global Compact, guides the Company in the journey towards generating sustainable value for all its stakeholders – among which suppliers are of particular importance. This commitment takes the form of specific objectives and actions in the environmental, social, governance and innovation sphere, as identified in the Sustainability Policy and Plan published in the "Sustainability" section of the Company's corporate website.

Rai Way's Sustainable Supply Chain Policy ("the Policy") has been designed to facilitate the promotion of sustainable practices in the supply chain, as already envisaged in the Code of Ethics and other corporate documents (such as policies, rules, regulations) referred to in the "References" section, which also contains references to the main national and international standards and good practices.

### 2. Scope and addressees

The Policy concerns the procurement processes of works, goods and services carried out by Rai Way and related both to procedures within the scope of public record<sup>1</sup> and to private negotiations for contracts that are not part of the public record, without prejudice to the appropriate legislative distinctions.

The Policy applies to suppliers/contractors, sub-suppliers/subcontractors and associates (jointly "suppliers" or "addressees") who have dealings with Rai Way, regardless of whether they are registered in the Rai Way Suppliers List.

Observance of the contents of the Policy, of the related provisions and of the corporate policies referred to herein shall be considered an essential part of the obligations undertaken by the addressees towards Rai Way, for all intents and purposes. The addressees are in turn required to share the principles set out in the Policy with their employees, subcontractors/sub-suppliers and associates and to ensure and verify compliance with them.

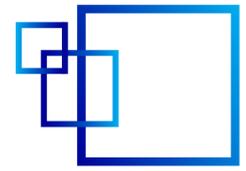
### 3. Principles and vision

*"Sustainable supply chain management means being concerned about environmental, social and economic impacts and encouraging good governance practices through life cycle analysis of goods and services. The purpose of sustainable supply chain management is to create and increase the long-term social, environmental and economic value of products and services in the marketplace for all stakeholders involved, with a view to a just transition"* (UN Global Compact

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<sup>1</sup> With particular reference to the case of excluded contracts pursuant to Articles 4 and 15 of Legislative Decree no. 50/16 as amended (in the document "Public Contracts Code")





Network Italy, 2022).

Rai Way is committed to establishing mutually beneficial relationships with its suppliers in order to pursue a common process of value creation based on the following general principles:

- Fairness and transparency in dealing with suppliers;
- Respect for human rights and occupational health and safety standards;
- Attention to the environment and combating climate change as well as ethical and legal aspects;
- Collaboration and innovation for the sustainable development of the supply chain;
- Development of best practices;
- Measuring and continuously improving ESG performance.

Furthermore, in view of the specificity of its business model and the issues considered "material" within its sustainability strategy and related risks, Rai Way has formulated a vision of sustainable, responsible procurement, based in particular on:

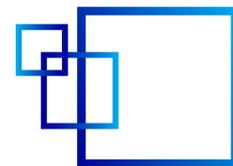
- Reduced energy consumption and climate-changing emissions generated by the supply chain;
- Guarantee of human rights and safety at work throughout the supply chain;
- Promoting local development through relations with suppliers and local communities.

## 4. Objectives

The main objectives that the Company aims to pursue by adopting this Policy are set out below:

- Recognise and leverage the good practices adopted by suppliers in the fields of environment, energy, health and safety at work, information security, protection of rights, ethics and anti-corruption, harnessing certifications issued by third parties (e.g. ISO, SA, legality rating);
- Integrate sustainability performance into procurement design criteria and subsequent supplier selection, by introducing requirements and reward mechanisms;
- Raise awareness of ESG issues among suppliers through opportunities (e.g. webinars, meetings) to spread a culture of sustainability;
- Encourage and stimulate suppliers to develop a proactive approach capable of generating additional positive impacts that offer solutions to sustainability challenges;
- Promote the maturity of suppliers on sustainability issues and their ability to generate positive impacts through awareness-raising measures and by supporting and monitoring the assessment of sustainability performance, in pursuit of continuous improvement, with particular regard to small- and medium-sized enterprises.
- Promote and specifically monitor the progressive reduction of CO2 emissions in the supply chain;
- Promote the effective participation of small- and medium-sized enterprises in procurement processes;





- Provide support to suppliers, particularly small- and medium-sized enterprises, in developing and improving their commitment to ESG issues;
- Collect and measure data and results against ESG performance targets;
- Provide suppliers with information on the ESG criteria adopted in the procurement process in a transparent manner.

## 5. Implementation modes

In order to pursue the aims of this Policy, Rai Way plans to introduce ESG criteria in its procurement processes, in the form of prerequisites or bonus mechanisms, applied to the supplier and/or to the product (labour, good or service) being procured, as detailed below.

In the case of public procurement, these criteria will be applied in accordance with the provisions of the Public Contracts Code.

Should Rai Way find non-compliance with the Policy on the part of the addressees, the Company reserves the right to request, in particular and without prejudice to its contractual powers, the adoption of improvement actions, making itself available for dialogue on the subject.

### ***ESG criteria related to the supplier***

In addition to the subjective certifications recognised at national and international level (e.g. legality rating, ISO, SA) Rai Way considers the possession of a sustainability rating (e.g. ESG rating) by its suppliers a relevant element to prove the engagement and active involvement of its supply chain on sustainability issues<sup>2</sup>.

Rai Way looks favourably on the adoption of such assessments on an increasingly larger scale and thus organises periodic opportunities for information and dialogue aimed at suppliers. It also promotes – where not already existing – assessments of suppliers by major rating providers, supporting interested suppliers with the ESG onboarding and improvement process.

### ***ESG criteria related to the product***

From the design phase (e.g. specifications and technical specifications), Rai Way intends to emphasise minimum and bonus ESG performance requirements, in keeping with the nature of the labour, good or service being acquired and the different award criteria adopted (lowest price or value for money).

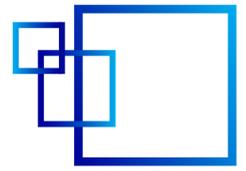
## 6. Dissemination and update

This policy, as resulting from periodic updates or event of significant changes in the relevant regulatory, organisational, strategic or operational context – is available from the Sustainability section of the Company's website ([www.rairway.it](http://www.rairway.it)) and the Rai Way Suppliers portal, and is also cited in the Company's Non-Financial Report.

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<sup>2</sup> In any case, pursuant to the Public Contracts Code not obtaining an assessment will not jeopardise a supplier's participation in a public tender, nor its entry/retention in the Rai Way Suppliers List. In procurement relating to non-public contracts, Rai Way may give preference, in selection, to suppliers with a sustainability assessment.





## 7. References

This section lists both the corporate documents (policies, rules and regulations) and the national and international standards and frameworks that this Policy refers to and is inspired by:

### **Rai Way Documents**

- Code of Ethics
- Organisation, Management and Control Model pursuant to Legislative Decree no. 231/01;
- Sustainability Policy;
- Quality Policy;
- Environment, Health and Safety Policy;
- Anti-Corruption Policy;

### **Standards and frameworks**

- UN Universal Declaration of Human Rights;
- Declaration on Fundamental Principles and Rights at Work and related Conventions issued by the International Labour Organisation (ILO);
- Sustainable Development Goals set by the United Nations 2030 Agenda (SDGs);
- Ten Principles of the UN Global Compact (UNGC);
- UNGC Network Italy Whitepaper - "Sustainable Supply Chain Management: Between Responsibility and Opportunity for Business" (2022);
- European Commission, "Buy Green! A Handbook on Green Public Procurement" - 3rd edition (2016);
- Ministry of Economy and Finance, "Operational guide for compliance with the principle of not causing significant damage to the environment" (2021);
- ISO 20400:2017 Sustainable procurement;
- Minimum environmental criteria (CAM) referred to in Article 18 of Law No. 221/2015 and Article 34 on "Energy and environmental sustainability criteria" of Legislative Decree No. 50/2016, the "Public Contracts Code".

