



DECLARATION OF NON-FINANCIAL NATURE
PURSUANT TO LEGISLATIVE DECREE NO. 254/2016



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Highlights

Rai Way operates throughout the national territory with an articulated, extensive and complex broadcasting network that, to date, allows for a population coverage of over 99%, capable of providing services on both terrestrial and satellite platforms, using both analogue and digital technology, and that allows for the simultaneous distribution and broadcasting of various contents in different areas of the Italian territory, as well as for the proportioning of the required capacity according to client's needs. The capillary presence across the Italian territory is therefore an element that strongly distinguishes Rai Way. Rai Way currently has more than 600 employees with a presence in all regions; over 2,300 sites throughout Italy; large sites in strategic locations; strong presence in rural areas; 1 head office in Rome, 20 branch offices and 2 control centres in Milan and Rome. This widespread presence places Rai Way at the centre of a network of relations with various national and local stakeholders, such as local authorities and institutions, local suppliers and companies, schools, citizens and the environment in general, with whom different forms of dialogue, confrontation and mutual growth have been developed and consolidated over the years.

LETTER FROM THE CHAIR

Dear Stakeholders,

despite the fact that during 2020 new and unforeseen challenges arose putting the entire system in which we operate to the test, Rai Way was able to achieve important results, underscoring the solidity and resilience of our business model, even in the difficult context due to the COVID-19 health emergency. The Company dealt with this emergency effectively, ensuring the continuity of operations while protecting the safety needs of our personnel.

With a view to reconciling the need for business continuity with the higher demands of guaranteeing and protecting the health of workers, Rai Way indeed implemented an articulated line of action to deal with the COVID-19 emergency. In particular, starting in March and on the basis of experiments launched in 2019, we implemented an emergency agile work model for our staff, enabled by tools and equipment, starting from a strategic configuration geared towards balancing the safeguarding of corporate operations and the objective of maximum protection of staff health. Learning activities, both for management and operational staff, have been converted into e-learning activities, with in-person training being limited to specifically identified courses on health and safety at work, as warranted.

A decisive step in confirming Rai Way's commitment and attention to environmental, social, governance and innovation aspects was represented by the approval of the Company's 2020-23 Industrial Plan, which took place at the end of the first quarter and, for the first time, include specific forecasts aimed at achieving sustainable development objectives in relation to ESG issues. As proof of the effectiveness of the policies and lines of action adopted for a variety of corporate departments, all the certifications already earned by the Company were confirmed in 2020, with particular reference to the environmental management system and the quality management system, and, as it pertains to health and safety in the workplace, the newly awarded ISO 45001 certification replaced OHSAS 18001 certification.

Furthermore, the Company embarked upon a path of engagement with the main ESG rating agencies, obtaining for the first time in 2020 the certificate of adherence to the CDP (formerly, Carbon Disclosure Project) and the recognition by MSCI of a significant improvement in performance on the privacy and data security front.

Following a careful analysis of international best practices, in order to strengthen its competitive positioning on sustainability issues, the Company developed, in the last part of the year, a set of actions that, at the beginning of 2021, led to the preparation of the first Sustainability Plan, which, together with the Sustainability Policy, defines the corporate strategy in this area until 2023, in line with the approach anticipated by the 2020-23 Industrial Plan. Through challenging objectives, such as the achievement of Carbon Neutrality in 2025, Rai Way thus confirms its commitment to responding to global challenges and to generating sustainable value in the medium-long term for all stakeholders.

With regard to governance issues, numerous activities were carried out in 2020, updating the Model pursuant to Legislative Decree no. 231/2001, further strengthening the processes inherent in the protection of personal data and in other profiles, which are also relevant from a sustainability perspective; functional in-depth studies were carried out for the Company's adoption of the Corporate Governance Code for listed companies, approved by the Corporate Governance Committee as the new edition of the Corporate Governance Code and applicable from 2021.

In light of the goals we have achieved, we look back with satisfaction on the path we have travelled so far, and with confidence on the one still ahead of us, aware that it is only through a constant and concrete

commitment to achieving common goals and shared values with our stakeholders that we can grow together and face new challenges of sustainable development in the best possible way.

On behalf of the Board of Directors

The Chairman

Giuseppe Pasciucco

METHODOLOGY NOTE

The Declaration of Non-Financial Nature (hereinafter also the “DNF” or the “Declaration”) of Rai Way S.p.A. (hereinafter referred to as “Rai Way” or “the Company”), which is published on an annual basis, is prepared pursuant to Legislative Decree. 254/2016, and in accordance with GRI Standards (“in accordance - Core” option), published in 2016 by the Global Reporting Initiative, and supplemented with any amendments subsequently published by the entity.

The GRI Standards are now the most widely used and internationally recognised non-financial reporting standards. The identification and reporting of the contents of this DNF considered the GRI principles of materiality or relevance, as well as inclusiveness, sustainability context and completeness. Pages 33 to 37 of this DNF set out all the issues that, following a materiality analysis and assessment, were considered relevant in terms of the social and environmental impact of Rai Way’s activities for the decisions of its stakeholders. There were no significant changes to the reporting parameters compared to the previous year.

The preparation of the of Rai Way S.p.A. DNF 2020 (01.01.2020-31.12.2020 reporting period, performance trends to the 2018-2020 three-year period, where available) was based on a structured reporting process that provided for: the involvement of all corporate structures/departments responsible for the relevant areas and related data and information subject to non-financial reporting. They were asked to contribute to the identification and evaluation of material themes, significant projects/initiatives to be described in the document and in the phase of data collection, analysis and consolidation, in order to verify and validate all the information reported in the Declaration, each one for its own area of purview. In particular, data and information included in this Declaration are derived from the corporate information system used for the management and accounting of the Group, as well as from a non-financial reporting system specifically implemented to meet the requirements of Legislative Decree no. 254/2016, and the GRI Standards. Data were processed by detailed summaries and calculations or by estimates. No restatements have been made with respect to the previous year’s figures, except where expressly stated. Data and information of economic and financial nature are derived from the 2020 Annual Report.

The DNF was approved by the Board of Directors on 18 March 2021 and, pursuant to Article 3, Section 10, of the Decree, it requires a discrete certification of compliance issued by independent auditors PricewaterhouseCoopers S.p.A.

RAI WAY

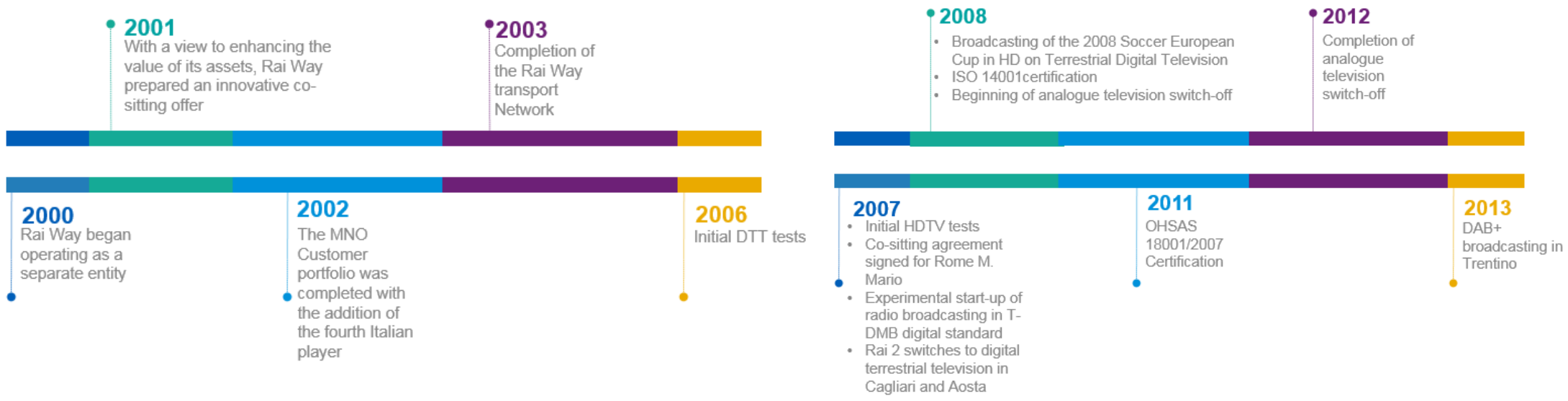
The story

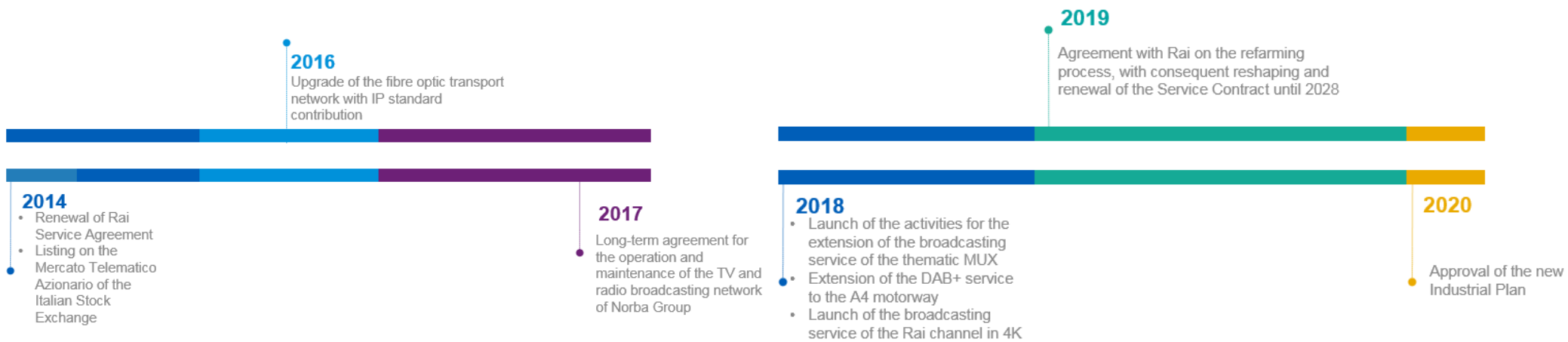
Rai Way is a company operating in the sector of communications infrastructure and network services. The Company offers integrated services to a clientele that includes broadcasters, telecommunications operators, private companies and public administration.

Rai Way was incorporated on 27 July 1999 and has been operational since 1 March 2000, following the transfer of the “Transmission and Broadcasting Division” business unit of Rai - Radiotelevisione Italiana Spa. This operation entailed the transfer to Rai Way of ownership of the infrastructures and plants for television and radio broadcasting. An additional effect was the transfer by RAI of human capital and technological know-how in the field of transmission and broadcasting of radio and television signals.

Rai Way can boast a capillary presence throughout the Italian territory. The head office in Rome operates in coordination with 20 other regional offices, managing more than 2,300 sites throughout Italy. This gives the Company an infrastructure leadership determined by the uniqueness and extent of its own network. In addition, the National Control Centre located in Rome, by playing a major role in the configuration, management and monitoring of transmission circuits, has an indispensable role in ensuring the high quality of services offered. Equally fundamental is the activity of the National Broadcasting Control Centre in Milan, which is responsible for guaranteeing the proper operation of the broadcasting systems in Italy.

As of 19 November 2014, as a result of the Global Sale Offer promoted by the Rai shareholder, Rai Way shares are being traded on the Electronic Stock Market (MTA) of Borsa Italiana (Italian Stock Exchange).





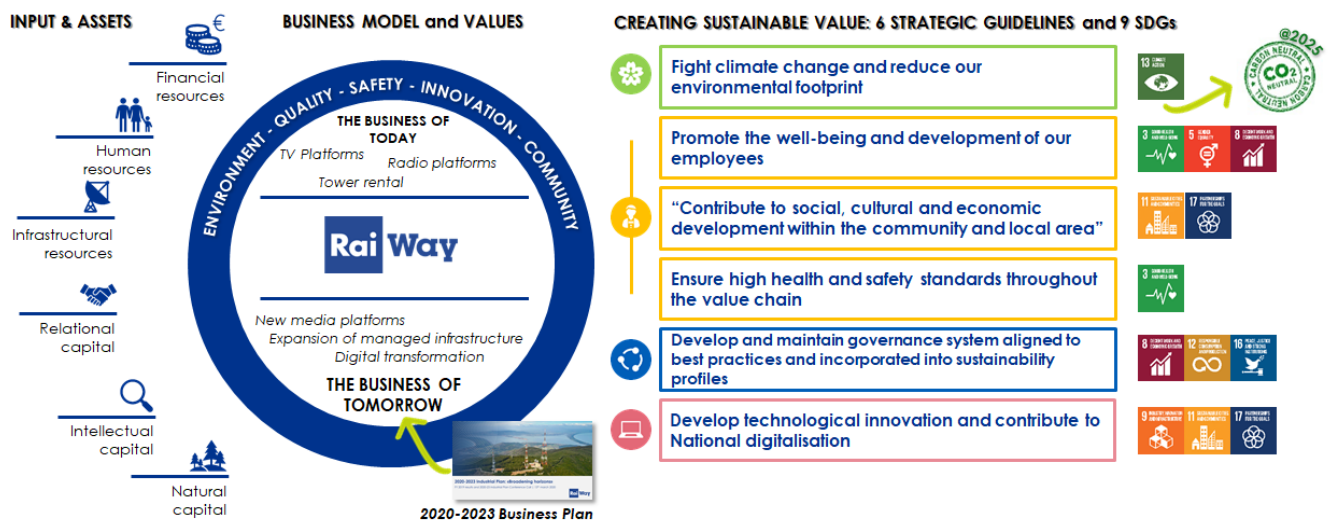
Business Model and Values

Rai Way's business model has demonstrated strong resilience even in the face of exceptional events such as the Covid-19 pandemic, confirming the Company's ability to continue creating value over time.

The process of creating value over time is based on a business model that first and foremost enhances the value of all the capital used by the Company and the 2020-23 Industrial Plan, and, secondly, enables the Company to pursue environmental, social and economic objectives that are aligned to the United Nations Sustainable Development Goals (SDGs).

Thanks to a sustainable business model, it becomes possible to face the new challenges emerging from increasingly changing and competitive scenarios not only by reacting to risks, but by seizing all the opportunities without ignoring the social implications.

The Board of Directors of Rai Way

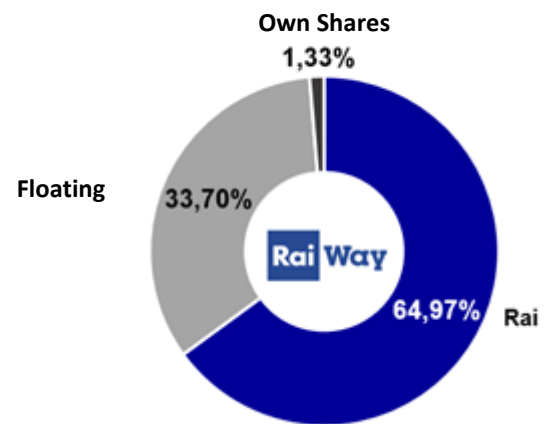


Strategic guidelines, identified in line with inputs and the business model, aim to make clear the Company's commitment to sustainable development. They define the Company's response to the global challenges the SDGs summarise, reaffirming the contribution to the medium-long term generation of all stakeholders.

The Rai Way Values

Rai Way is the Rai Group Company that owns the infrastructure and equipment for television and radio signal transmission and broadcasting.

As of 31 December 2020, 64.97% of Rai Way's share capital is held by Rai - Radiotelevisione Italiana Spa, 33.70% is traded on the stock market and (approximately) 1.33% consists of treasury shares.



BOX: RELATIONS WITH ITS SHAREHOLDERS

For Rai Way, it is fundamental to maintain stable and effective relations with its Shareholders, institutional investors and the entire financial community. Continuous engagement activities were carried out through numerous individual and group meetings and conference calls, with sell-side investors and analysts; financial roadshows; the presentation of the 2020-2023 Industrial Plan; and participation in institutional conferences organised by leading sector institutions. This ongoing dialogue with the financial community complemented the routine conference calls to present quarterly results.

Furthermore, the ordinary Shareholders' meeting was held on 24 June 2020, with the participation of 89.81% of the Rai Way shareholding.

It should be noted that the results of meetings and conference calls are constantly monitored, analysed and evaluated in order to ensure an effective dialogue with the financial community. Furthermore, always with a view to maintaining clear communication with its Shareholders, Rai Way has worked to continuously update the Investor Relations section of its website with detailed and complete information.

THE ENVIRONMENT

In pursuing its objectives, Rai Way has always taken into consideration the needs related to environmental sustainability. The Environment, Health and Safety Policy and the Code of Ethics adopted by the Company, together with the regulations in force and the internal procedures on environmental protection, represent the foundations on which Rai Way bases its work, thus allowing the Company to maintain a constant attention towards environmental protection. The Company has implemented an Environmental Management System (EMS) and was awarded UNI ISO 14001 certification.

QUALITY

For Rai Way, the fulfilment of quality requirements is the cornerstone of the Company's actions and a distinctive element that characterises activities and services rendered to its Clients. Within this framework, the Company, in relation to service quality profiles, endeavours to provide: wide coverage of the Italian territory; high technical quality of the infrastructures; reliability in the provision of services, in compliance with contractual and regulatory specifications, as well as with corporate standards; operating efficiency, paying constant attention to its economic performance together with social and environmental impacts, within the framework of sustainability, generated towards the Stakeholders and the Community.

In this context, in 2020, Rai Way renewed its ISO9001:2015 certification with the following purpose: "Provision of services for the design of systems and networks for broadcasting and transmission of radio and television signals. Provision of coordination and planning services for the routine maintenance of plants and networks intended for the transmission and broadcasting of radio and television signals.

THE COMMUNITY

Rai Way is fully aware of the impact of its operations on the community. As a company with a capillary presence throughout Italy, Rai Way is fully aware of its economic-social-environmental responsibilities and, for this reason, over the years, it has sought to improve and deepen its relations with a variety of stakeholders in Italy.

THE RAI WAY VALUES

SAFETY

The corporate security policy is the basis of any development strategy adopted by Rai Way in pursuit of its mission.

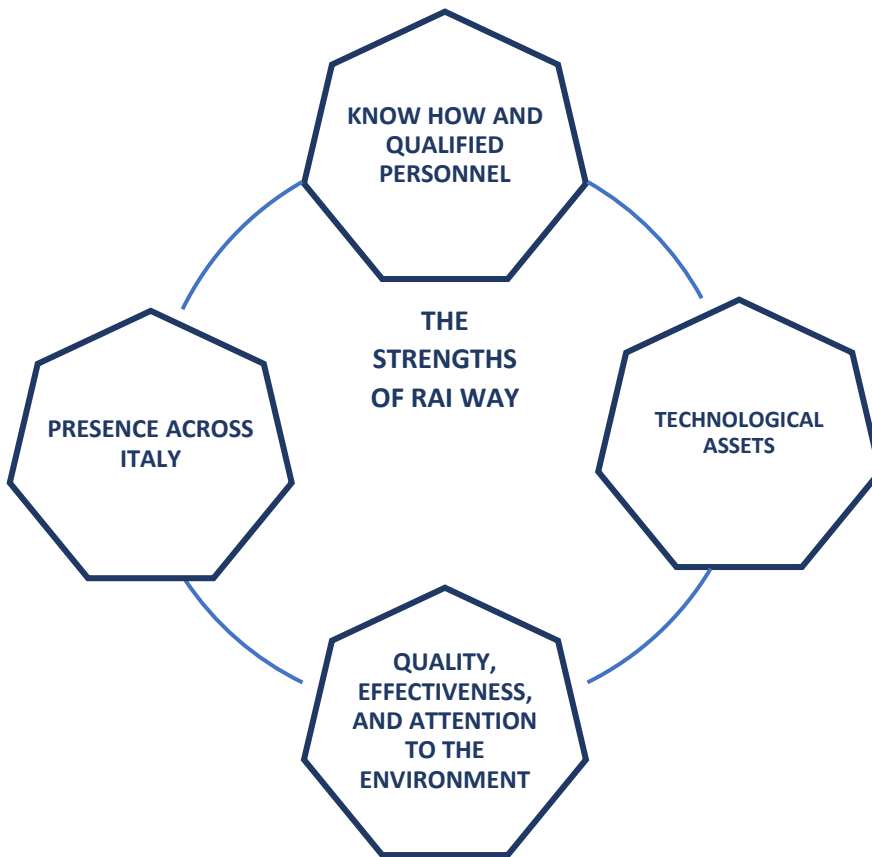
In order to guarantee the health and safety of its employees, Rai Way has drawn up an Environmental, Health and Safety Policy and prepares and delivers training courses to all staff, pursuant to the applicable statutory provisions.

INNOVATION

Rai Way places at the core of its work the interest and commitment towards innovation, which it sees as the main path to follow in order to respond to the continuous changes and challenges of a highly competitive market. For this reason, the Company pursues a detailed and heterogeneous innovation strategy capable of involving the entire corporate structure, from the technological and commercial departments to the managerial and organisational profiles.

The Market

Rai Way is a leader in the Italian market for communications infrastructure and network services. The knowledge and operational skills of highly qualified personnel, an extensive network infrastructure and a strong presence in Italy are the elements that made it possible to position the Company.



Rai Way has 2,300 sites dedicated to the transmission and broadcasting of the radio and television signal. In addition, the national transport network covers the entire Italian territory by integrating different technologies, such as radio links, satellites and optical fibres.

Rai Way has fully understood the need to anticipate the desires of buyers, with the aim of always offering the best service on the market. This has allowed the Company to remain competitive in its reference market, in which the technology used for the transmission and broadcasting of television and radio signals is in rapid and continuous evolution.

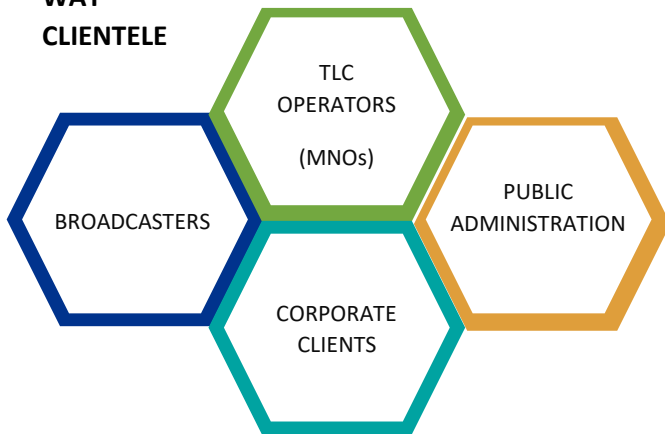
In addition, long-term investment plans for the development of new services and for the maintenance of the state of operation of infrastructures, as well as the continuous training of Rai Way personnel with the aim of increasing the technological knowledge of technicians and engineers, have also played a fundamental role in maintaining market leadership.

In addition to broadcasting services, Rai Way also offers its customers state-of-the-art tower rental services, including in the field of telecommunications towers, transmission services, and network services. As for the television market, compared to other Western European countries, Italy is characterised by a far greater diffusion of the digital terrestrial television (DTT) platform. In other countries, the lower penetration of the DTT platform is correlated with the wider and more competitive presence of satellite (e.g., UK and Germany), cable (e.g., Germany) and OTT (e.g., France) platforms. The strong position of DTT in the Italian TV broadcasting scenario is further supported by the absence of cable TV (generally, at European level, cable TV providers are the strongest competitors in the market for both TV and broadband), and by a reduced penetration of OTT platforms, which, nevertheless, is growing also thanks to the increased diffusion of broadband telephone networks.

BOX: A NEW NETWORK CONFIGURATION FOR RAI WAY, WHICH WILL ALSO HAVE A DECREASED ENVIRONMENTAL IMPACT

2022 will be a turning point for the television market and for Rai Way, since it will be characterised by the adoption of the new signal transmission standard (DVB-T2) following the completion of the preparatory activities for the release of the 700 MHz band. This process will lead the Company to adopt a network for terrestrial television broadcasting services that is more extensive in terms of facilities and technologically advanced. At the same time, the new network configuration will allow a reduction in terms of environmental impact.

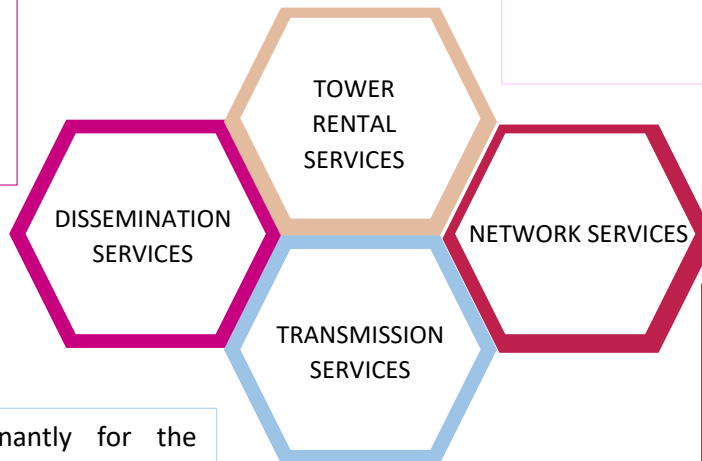
THE RAI WAY CLIENTELE



As of 31 December 2020, 85% of Rai Way's revenues refers to RAI. The remaining 15% refers mainly to MNO's customers operating in the Italian market, as well as broadcasters (both television and radio), the Public Administration, other TLC operators and other corporate customers

Services used to carry terrestrial and satellite television and radio signals to end users located in a given territory via Broadcasting Networks

- hosting, i.e., services for the housing of transmission equipment at broadcasting points (sites) for radio, television, telephone and telecommunications signals
- operation and maintenance services of the transmission systems hosted in stations
- complementary and related services



Transmission services predominantly for the transmission of radio and television signals via the connecting network (radio links, satellite systems, fibre optic) and, in particular, the provision of Contribution Services, meaning the one-way transport of video/audio/data (i) via analogue or digital circuits between fixed sites and(ii) via radio frequency (RF) signals from the satellite within a geographical area of a given width (coverage), and connected services

They include services that the Company can provide in relation to electronic communication and telecommunications networks in general (by way of example, design, construction, installation, maintenance and management activities, as well as consulting, monitoring, radio protection services)

The following Table shows which services are provided to each of the customer categories listed above. The services provided for Rai are represented differently from those provided for other *Broadcasters* clients, as a consequence of the different activities carried out for Rai itself.

	SERVICES			
	Broadcasting services	Transmission services	Tower rental	Network services
Rai	●	●		
Other Broadcasters	●	●	●	●
TLC Operators		●	●	
Public Administration and Corporate	●	●	●	●

GOVERNANCE

The Management Model

The corporate governance system that presides over the management and control of the Company, in place in 2020 and in line with what has already been reported with reference to 2019, is aligned to the so-called traditional administration system, which enhances the role of the Board of Directors as the primary management body and delegates the control function to the Board of Statutory Auditors, also in line with the provisions of the Corporate Governance Code for Listed Companies (July 2018 edition) in force in the same year 2020 and adopted by the Company (the "Corporate Governance Code") and with recognised best practice principles¹. The system includes the controls aimed at managing the conflicts of interest, increasing the efficiency and effectiveness of the internal controls and ensuring transparency to the market. The corporate bodies are the Shareholders' Meeting, the Board of Directors and the Board of Statutory Auditors. The powers and operating methods of the corporate bodies are regulated by the law and the By-laws, as well as by the internal procedural provisions approved, in compliance with the former, by the corporate bodies within their areas of purview. With reference to the Rai Way Corporate Governance system and the appointment/integration, composition and functioning of the corporate bodies, notwithstanding exceptions discussed below, reference is made to the more detailed information in the Corporate Governance Report and in the Ownership Structures relating to financial year 2020 (www.raiway.it, in the Corporate Governance/Shareholders/2021 Special and Ordinary Shareholders' Meeting/Meetings section).

The **Shareholders' Meeting** is the body that expresses in its resolutions the will of the Company. It operates according to the provisions of the law and the By-laws, as well as to the Meeting Regulations (www.raiway.it in the section Corporate Governance/Shareholders' Assembly). The Shareholders' Meeting resolves, during ordinary and extraordinary sessions, on matters assigned to it in accordance with the law and the By-laws. In 2020, the Shareholders met in an ordinary session once, with about 89.81% of the share capital attending (in accordance with the procedures allowed by the applicable regulations concerning the COVID-19 emergency). During the Shareholders Meeting, the Board of Directors, through the Chief Executive Officer, reported on the performance of the previous year and on the financial statements submitted to the approval of the Shareholders.

The **Board of Directors** has a central role in the governance system. The Board of Directors is invested with powers to manage the Company and the right to carry out all actions deemed necessary or advisable to implement the corporate purpose, with the sole exception of those actions that the By-laws reserve to the Shareholders. According to the By-laws, the Board of Directors must have no less than 5 and no more than 11 members; they must meet the requirements in terms of professional expertise, integrity and independence, as detailed in the By-laws. The members of the Board of Directors are elected by way of the so-called slate vote system, i.e., based on lists submitted by Shareholders who, on their own or together with other Shareholders, own Rai Way shares representing at least 2.5% of the share capital with voting rights or representing a lower percentage established by mandatory provisions of law or regulations.

For additional information on the powers of the Board of Directors and the procedures for appointing its members, please refer to the Articles of Association in force, available at www.raiway.it.

The composition of the Board of Directors, appointed at the Shareholders' Meeting of 24 June 2020 and in office for three financial years and, therefore, until the Shareholders' Meeting held for the approval of the Financial Statements for financial year 2022 - in office from that date and for the remainder of 2020 (as of

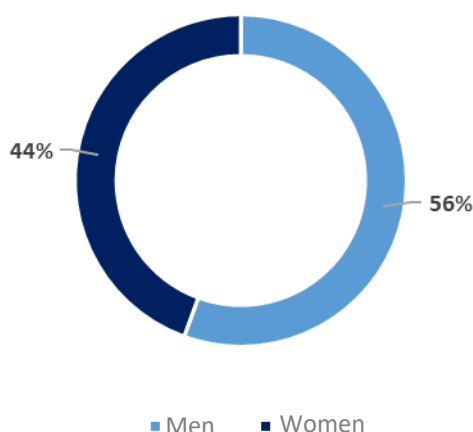
¹ It should be noted that in 2021, the Company adopted the new edition of the Corporate Governance Code for Listed Companies.

the date of this document) - is consistent with the legal and regulatory provisions on gender balance, and includes six Independent Directors of its nine overall members.

COMPOSITION OF THE BOARD OF DIRECTORS AS OF 31.12.2020, BY GENDER AND AGE CLASS, AND PRESENCE OF INDEPENDENT DIRECTORS:

- PASCIUCCO Giuseppe - Chairman of the Board of Directors
- MANCINO Aldo - Chief Executive Officer
- CICCOTTI Stefano - Director
- DELLEANI Riccardo - Director (Independent) Chairman of the Remuneration and Appointments Committee
- DONESANA Annalisa Donatella - Director (Independent) - Member of the Remuneration and Appointments Committee
- MORGANTE Barbara - Director (Independent) - Member of the Control and Risk Committee²
- MOSETTI Umberto – Director (Independent) Chairman of the Remuneration and Appointments Committee
- SCIUTO Donatella - Director (Independent) - Member of the Audit and Risk Committee²
- TAGLIAVINI Paola - Director (Independent) - Chairman of the Control and Risk Committee²

On the above date, the Board of Directors was composed entirely of members aged over 50 and under 60.



Based on the renewal of the Board of Directors at the aforementioned Shareholders' Meeting for the approval of the 2019 Financial Statements, the Board, taking into account the results of the self-assessment process on the size, composition and functioning of the Board itself and of the Board Committees carried out pursuant to Self-Regulatory Code (in the edition adopted at that time), shared with the Shareholders, as recommended by this Code, after consulting the Remuneration and Appointments Committee, its own opinion in relation to the size of the Board and on the managerial and professional figures whose presence on the Board was deemed appropriate. It should be noted that, in accordance with the legislation on gender balance in force at the date of this document, as well as on the basis of the Articles of Association, a share equal to at least two fifths of the Administrators must be reserved to the least represented gender, within the Board of Directors. During the 2021 financial year, the Board of Directors carried out the annual self-assessment process for 2020, also with reference to its size and composition, confirming the overall adequacy of the structure. The Board of Directors has created from among its members the Control and Risks

² During 2021, this Committee was renamed the "Control, Risk and Sustainability Committee".

Committee², which, in 2020, as of the date of this document, also carried out the functions of Related Party Committee, and the Remuneration and Appointments Committee.

The **Control and Risks Committee**³ is made up entirely of non-executive and independent Directors and has the main task of supporting, with information, advisory, proposing and investigative functions, the Board of Directors on the internal control system and risk governance policies, as well as, as provided for by the relative company procedure, on transactions with related parties. In 2021, at the time of adoption of the new edition of the Corporate Governance Code, these functions were updated to comply with the provisions of that edition, providing for additional tasks relating to Sustainability.

The **Audit and Risk Committee**³ in office on the Shareholders' Meeting of 24 June 2020, as of the date of this report consists of:

- Paola Tagliavini - Chair
- Barbara Morgante
- Donatella Sciuto

For reasons of simplification and efficiency of the governance structure, in compliance with the latest edition of the Corporate Governance Code, Rai Way decided to merge the functions of the Appointments Committee and the Remuneration Committee into a single committee. The composition, skills and operation of the Committees are governed by provisions defined by the Board of Directors. The **Remuneration and Appointments Committee** is made up entirely of non-executive and independent Directors and has the main task of supporting, with preliminary, consultative and propositional functions, the Board of Directors in defining general policies for the remuneration of Directors and top management, and in matters relating to the appointments and composition of the Board itself. The **Remuneration and Nomination Committee**, in office from the Annual General Meeting on 24 June 2020, as of the date of this report comprises:

- Riccardo Delleani - Chair
- Annalisa Raffaella Donesana
- Umberto Mosetti

The Board of Statutory Auditors is the supervisory body of Rai Way. It includes three standing auditors and two substitute auditors. Auditors are elected using the so-called slate vote system, i.e. based on lists submitted by Shareholders who, on their own or together with other Shareholders, hold shares with voting rights representing at least the percentage of share capital established by applicable law or regulations.

For additional information on the powers of the Board of Statutory Auditors and the procedures for appointing its members, please refer to the current Articles of Association, available on www.raiway.it.

During the 2020 financial year (as of the date of this document), the Board of Statutory Auditors – appointed at the Shareholders' Meeting held on 23 April 2018 and in office until the Shareholders' Meeting held to approve the 2020 Financial Statements – comprised:

- Silvia Muzi - Chair
- Maria Giovanna Basile - Standing Auditor
- Massimo Porfiri - Standing Auditor
- Nicoletta Mazzitelli - Alternate Auditor
- Paolo Siniscalco - Alternate Auditor

³ Refer to Note 2.

The composition of the Board of Statutory Auditors is consistent with the applicable statutory and regulatory provisions on gender balance, comprising one standing Auditor and one substitute Auditor selected from the least represented gender.

GRI 405-1 - Diversity of governance bodies and employees

Members of Governing Bodies (headcount)	u.m.	2018			2019			2020		
		Man	Woman	TOTAL	Man	Woman	TOTAL	Man	Woman	TOTAL
<i>Younger than 30</i>	No.	0	0	0	0	0	0	0	0	0
<i>Between 30 and 50</i>		0	0	0	0	0	0	0	0	0
<i>Older than 50</i>		5	4	9	5	4	9	5	4	9
Total		5	4	9	5	4	9	5	4	9
<i>Younger than 30</i>	%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
<i>Between 30 and 50</i>		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
<i>Older than 50</i>		100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Total		100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Members of Governing Bodies (headcount)	u.m.	2018			2019			2020		
		Man	Woman	TOTAL	Man	Woman	TOTAL	Man	Woman	TOTAL
Members with disabilities	No.	0	0	0	0	0	0	0	0	0
Percentage of members with disabilities	%	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Employees (headcount)	u.m.	2018			2019			2020		
		Man	Woman	TOTAL	Man	Woman	TOTAL	Man	Woman	TOTAL
Managers	No.	16	5	21	18	5	23	18	5	23
<i>Younger than 30</i>		0	0	0	0	0	0	0	0	0
<i>Between 30 and 50</i>		5	3	8	6	2	8	6	1	7
<i>Older than 50</i>		11	2	13	12	3	15	12	4	16
Managers	%	76	24	100	78	22	100	78	22	100
<i>Younger than 30</i>		0	0	0	0	0	0	0	0	0
<i>Between 30 and 50</i>		31	60	38	33	40	35	33	20	30
<i>Older than 50</i>		69	40	62	67	60	65	6	80	70
Managers	No.	114	24	138	137	26	163	137	28	165
<i>Younger than 30</i>		0	0	0	0	0	0	0	0	0
<i>Between 30 and 50</i>		38	17	55	45	17	62	46	18	64
<i>Older than 50</i>		76	7	83	92	9	101	91	10	101
Managers	%	83	17	100	84	16	100	83	17	100
<i>Younger than 30</i>		0	0	0	0	0	0	0	0	0
<i>Between 30 and 50</i>		33	71	40	33	65	38	34	64	39
<i>Older than 50</i>		67	29	60	67	35	62	66	36	61
Employees	No.	37	75	112	36	74	110	36	69	105
<i>Younger than 30</i>		7	8	15	11	8	19	8	3	11

<i>Between 30 and 50</i>		18	45	63	16	40	56	20	44	64
<i>Older than 50</i>		12	22	34	9	26	35	8	22	30
Employees		33	67	100	33	67	100	34	66	100
<i>Younger than 30</i>	%	19	11	13	31	11	17	22	4	10
<i>Between 30 and 50</i>		49	60	56	44	54	51	56	64	61
<i>Older than 50</i>		32	29	30	25	35	32	22	32	29
Manual workers			18	0	18	13	0	13	10	0
<i>Younger than 30</i>	No.	0	0	0	0	0	0	0	0	0
<i>Between 30 and 50</i>		2	0	2	1	0	1	1	0	1
<i>Older than 50</i>		16	0	16	12	0	12	9	0	9
Manual workers			100	0	100	100	0	100	100	0
<i>Younger than 30</i>	%	0	0	0	0	0	0	0	0	0
<i>Between 30 and 50</i>		11	0	11	8	0	8	10	0	10
<i>Older than 50</i>		89	0	89	92	0	92	90	0	90
Technicians			321	5	326	300	6	306	296	5
<i>Younger than 30</i>	No.	35	0	35	30	1	31	32	1	33
<i>Between 30 and 50</i>		163	5	168	141	5	146	135	3	138
<i>Older than 50</i>		123	0	123	129	0	129	129	1	130
Technicians			98	2	100	98	2	100	98	2
<i>Younger than 30</i>	%	11	0	11	10	17	10	11	20	11
<i>Between 30 and 50</i>		51	100	52	47	83	48	46	60	46
<i>Older than 50</i>		38	0	38	43	0	42	44	20	43
Total		No.	506	109	615	504	111	615	497	107
Total	%	82	18	100	82	18	100	82	18	100

Employees (headcount)	u.m.	2019			2020		
		Man	Woman	TOTAL	Man	Woman	TOTAL
Managers with disabilities or belonging to protected categories	No.	0	0	0	0	0	0
Percentage of Executives with disabilities or belonging to protected categories	%	0.000	0.000	0.000	0.000	0.000	0.000
Managers with disabilities or belonging to protected categories	No.	3	0	3	3	0	3
Percentage of Managers with disabilities or belonging to protected categories	%	2.190	0.000	1.840	2.190	0.000	1.818

Employees with disabilities or belonging to protected categories	No.	10	12	22	10	11	21
Percentage of employees with disabilities or belonging to protected categories	%	0.278	0.162	0.200	0.278	0.159	0.200
Workers with disabilities or belonging to protected categories	No.	3	0	3	2	0	2
Percentage of Workers with disabilities	%	0.231	0.000	0.231	0.200	0.000	0.200
Technicians with disabilities or belonging to protected categories	No.	23	0	23	23	0	23
Percentage of technicians with disabilities or belonging to protected categories	%	0.077	0.000	0.075	0.078	0.000	0.076
Total employees with disabilities or belonging to protected categories	No.	39	12	51	38	11	49
Percentage of total employees with disabilities or belonging to protected categories	%	7.738	10.811	8.293	7.646	10.280	8.113

Ethics and transparency in business operations

Rai Way considers ethics and transparency fundamental values in the conduct of its business. These values guide the Company in the conduct of its business, and especially in the management of relations with all its stakeholders.

This issue, considered strategically important by the Company, requires compliance with internal and external regulations and codes of conduct, respect for the rules and utmost fairness, without any conflict between corporate and personal interests.

GRI 419-1 - Non-compliance with laws and regulations in the social and economic area

Monetary penalties and non-monetary sanctions	u.m.	2018	2019	2020
Total monetary value of financial penalties	€	0	0	0
Total number of non-monetary sanctions	No.	0	0	0

With reference to the management of information, more specifically the issue of “Market abuse”, Rai Way Board of Directors approved specific provisions and procedures, also in force during 2020, aimed at creating the necessary organisational safeguards for the management of confidential and privileged information and the safe keeping of the register of persons having access to privileged information.

The purpose of these procedural rules is primarily to take account of the regulatory requirements concerning “market abuse” in order to prevent the untimely, incomplete or inappropriate handling of inside information and cause information asymmetry among the public. In particular, the dissemination of privileged information makes it possible to protect the market and investors by ensuring them adequate knowledge of relevant facts regarding Rai Way, on which to base their investment decisions. Another objective of the Code is to prevent certain individuals or categories of individuals from using inside information that has not yet been made public to speculate in the market, thereby harming investors who do not know such information.

In accordance with and based upon the aforementioned provisions, the Company has also adopted the Code of Conduct in matter of internal dealing, namely a procedure concerning the requirements by relevant individuals, such as members of the corporate bodies and qualified managers with strategic responsibilities, as well as persons “closely associated” with them, in relation to the possible completion of transactions involving shares or financial instruments issued by the Company or connected to them, with the purpose, in particular, to ensure information transparency vis-à-vis the market.

In continuity with past years, during the year 2020 the aforementioned Code of Conduct already approved by the Board of Directors remained in force.

MSCI Indicator - Business Ethics Training

Employees (headcount)	2018	2019	2020
Number of employees who have received Business Ethics training	18	129	601

Fiscal Strategy

Rai Way’s tax policy is based on compliance with the regulations in force, with a management activity founded on the values of honesty and integrity, following the best practices defined at a practical level by the Inland Revenue Agency and by the most qualified sources (Confindustria, Assonime, Order of Chartered Accountants). Since the Company has no representative offices abroad (branches, subsidiaries, establishments and/or other forms of permanent establishment), it is subject exclusively to Italian law, in particular, with reference to direct and indirect taxation, local taxation, tax substitution, VAT and other taxes.

As a company belonging to the RAI Group, Rai Way has adhered both to the “National Tax Consolidation”, which provides for the declaration of a group income for IRES purposes (compensating the incomes and

losses of the participating companies) and, if necessary, the payment of the relative tax for the entire group, and to the instrument defined as “Group VAT”, which essentially allows for the compensation of the debit and credit balances resulting from the periodic VAT settlements of the participating companies, thus making a single VAT payment for the entire group and optimising VAT financial flows. Both the “National Tax Consolidation” and “Group VAT” are regulated by specific contracts between the Company and Parent Company RAI.

Specifically, tax-related activities are managed by the Accounting & Tax Department, which reports directly to the Chief Financial Officer. In compliance with the provisions of Law no. 262 of 28 December 2005, the Company has prepared a variety of procedures, including a specific procedure concerning tax compliance, containing first and second level controls, aimed at ensuring that Rai Way’s internal control system observes best reference standards, and in compliance with the Code of Ethics and the Organisational and Management Model pursuant to Legislative Decree no. 231/2001 of the Company.

Tax-related activities are also monitored by independent auditors, who verify the contents of tax returns and, as required by law, sign the income tax return and the tax consolidation return.

Finally, Rai Way’s relations with the financial administration and Municipalities have always been based on utmost transparency and on criteria of constant cooperation and engagement, which may also be implemented through the submission of petitions for appeal.

GRI 207-4 Reporting of tax-related information

Fiscal data	u.m.	2018	2019	2020
Revenues from sales to third parties		33,084,360.49	33,201,576.14	33,170,201.94
Revenues from intra-group transactions with other tax jurisdictions*		1250.01	1,250.01	1,250.01
Pre-tax profit		82,548,601.52	88,839,188.68	88,302,811.81
Tangible assets other than cash and cash equivalents	€	180,938,014.50	177,638,307.92	200,934,673.67
Income taxes defined on a cash basis		21,644,365	24,595,812	24,034,298
Corporate income taxes accrued on profits/losses		24,030,000.00	24,740,000.00	24,670,000.00

* Commercial relations with S. Marino RTV SpA

In 2019, “Current taxes” increased compared to 2018 due to the higher pre-tax result and adjustments made to the accounting result, following the adoption of new accounting standard IFRS 16 (Leasing) balanced by savings in IMU tax on the basis of the new Land/Building Registry reclassifications of sites, by effect of Decree Law 33/2016, and increased deductions for IRES purposes.

In 2020, “Current taxes” decreased compared to the previous period due to a reduction in the pre-tax result and the adjustments made to the accounting result, also following the adoption of new accounting standard

IFRS 16 (Leasing) balanced by the saving from a lower tax charge for IRAP purposes, following adhesion by the Company to the tax relief measure provided by the “Decreto Rilancio”, which resulted in a contingent asset of the 2019 IRAP balance and a lower advance payment in 2020, within the maximum limit granted for state aid at group level, equal to 800,000.00 Euro, to be considered all-inclusive of all state aid available to the Company in 2020.

Bribery Prevention

Rai Way has adopted an Organisation, Management and Control Model pursuant to Legislative Decree no. 231/2001 and a Code of Ethics, which is an integral part of the Model itself, which contain principles and provisions aimed at preventing corruption.

The Organisation, Management and Control Model consists of a General Section and a Special Section. The General Section describes the contents and impacts of Legislative Decree no. 231/2001, as well as the basic principles and objectives of the Model, the duties of the Supervisory Body, the methods of adoption, dissemination, updating and application of the contents of the Model, and the provision of the disciplinary system. The purpose of the Special Section is to define the principles of conduct and the management rules that all Model Recipients must follow in order to prevent, in the context of the specific activities carried out therein and considered “at risk”, the commission of offences envisaged by Legislative Decree no. 231/2001, and to ensure conditions of correctness and transparency in the conduct of such activities. The Code of Ethics contains the principles of ethics and conduct underlying the work of those who operate or otherwise interact with Rai Way on an ongoing or temporary basis, taking account of their respective roles, the complexity of their functions, and the responsibilities assigned in order to pursue the goals of the Company. The principles contained in the Code of Ethics integrate the rules that the Company, and the subjects in it or operating with it, are required to comply with.

In 2020, the provisions set forth in the Organisation, Management and Control Model adopted by the Company pursuant to Legislative Decree no. 231/2001 were updated in keeping with the objectives of:

- aligning internal provisions in relation to the risks deriving from new types of offences introduced by the reference legislation;
- redefining the Special Part of Model 231 structured according to the types of offence following a system of processes, in which specific organisational and control protocols are associated with each process/area at risk.

Rai Way has also adopted a specific Corruption-Prevention Policy - which remained in force in 2020 as it is currently - containing additional measures to its Organisation, Management and Control Model, pursuant to Legislative Decree no. 231/2001, in relation to the cases contemplated by Law no. 190/2012, and established an internal organisational unit through the figure of a corporate POC who, also in collaboration with the Supervisory Body pursuant to Legislative Decree no. 231/2001, has the task of verifying the adequacy and effective application of the corruption-prevention measures.

The corruption-prevention measures adopted by the Company, most recently with the aforementioned Anti-Corruption Policy, aim to define an internal control and corruption risk prevention system integrated with other “control governance” tools (Legislative Decree Model no. 231/2001 and the Code of Ethics), with a

view to introduce additional measures or strengthen existing ones by coordinated action for a more effective fight against corruption and illegality.

GRI 205-1- Operations assessed for risks related to corruption

Company operations	u.m.	2018	2019	2020
Total number of transactions assessed for corruption risks	No.	15	32	32

GRI 205-3 - Confirmed incidents of corruption and actions taken

Corruption incidents	2018	2019	2020
Number of episodes	0	0	0

The aforementioned documents on the prevention of corruption were approved by the Board of Directors in the presence of the Board of Statutory Auditors and following prior analysis by the Supervisory Body and the Control and Risk Committee⁴. These documents were circulated among the employees of the Company by making them available on the corporate Intranet. The dissemination of the Code of Ethics, Model 231 and Anti-Corruption Policy to Rai Way suppliers, business partners and contractors is ensured by adding to any purchase, sale and consulting/co-operation agreements specific safeguard clauses which require the counterparties to state that they have reviewed these documents on the Rai Way website and have complied with them at the time of signing of the agreements. Compliance with these clauses is a contractual obligation, pursuant to Art. 1456 of the Italian Civil Code.

Box: Whistleblowing Reporting System

In order to contribute to identifying and fighting possible illicit/unlawful behaviours as well as to disseminate the culture of ethics and legality within the corporate organisation, Rai Way has adopted specific reporting channels and a whistleblowing procedure.

Reports may be submitted by persons belonging to the Company’s internal staff as well as by collaborators, customers, consultants, partners of the latter and suppliers of works, goods and services, and their respective employees and collaborators.

The following may be reported: alleged violations of the Code of Ethics, of the Model pursuant to Legislative Decree no. 231/2001 or of the Company’s Anti-Corruption Policy; alleged violations of other internal provisions or of laws and regulations applicable to the Company or of provisions of Public Authorities; alleged illegal, fraudulent or irregular conduct concerning the Company and/or relations with it; and, alleged conduct that causes damage to the Company’s assets or image.

In particular, the report must contain useful elements to allow the persons in charge to proceed with due and appropriate checks and investigations to verify the validity of the facts reported. An anonymous report is taken into consideration in cases in which it indicates circumstantial and concordant elements of fact, such

⁴ Refer to Note 2.

as to guarantee the recipient the fullest possible information on the specific fact or behaviour reported.

The reporting process consists of the following steps: first, the reporter sends the report by email or regular mail. The report is then brought to the attention of the Company's Audit Function and then, through it, to the Supervisory Body, the Anti-Corruption Measures POC operating under coordination of the Body itself, and the Stable Commission for the Code of Ethics, regarding the profiles under its purview and for the purposes of the relevant checks.

Finally, management principles and rules, as well as the provision of disciplinary measures in the event of violation, are provided for in order to guarantee the confidentiality of the identity of the person making the report.

Sustainalytics G.1.2 - Reports received through the Whistleblowing system

Number of reports	2018	2019	2020
Number of reports received through the whistleblowing system	0	0	0

Finally, with regards to anti-corruption training, following the in-class training initiative addressed to Rai Way's 231 and anti-corruption managers and POCs carried out in 2018, and which concerned, in particular, training and reporting flows inherent to corporate activities performed within risk areas, also with a view to further integrating the aforementioned flows, at the end of 2019 and continued in 2020, the Company launched an e-learning course on the principles of the Code of Ethics and on the Anti-Corruption Policy aimed at all Rai Way personnel.

In 2020, in continuity with previous years, the Company restructured, implemented and delivered e-learning training aimed at all Rai Way personnel and differentiated by area/corporate department, starting in October and yet to be completed. In addition, specific virtual classroom training was organised for Executive personnel in the first part of 2021.

GRI 205-2 - Communication and training about anti-corruption policies and procedures

Governing Body	u.m.	2018	2019	2020
Members of the Governing Body	No.	9	9	9
Total number of members of the Governing Body to whom anti-corruption policies and procedures have been communicated		9	9	9
Percentage of members of the Governing Body to whom anti-corruption policies and procedures have been communicated	%	100	100	100

Employees	u.m.	2018	2019	2020
Total Executives	No.	21	23	23
Total number of managers to whom anti-corruption policies and procedures have been communicated		21	23	23

Percentage of managers to whom anti-corruption policies and procedures have been communicated	%	100	100	100
Total Managers	No.	138	163	165
Total number of Executives to whom anti-corruption policies and procedures have been communicated		138	163	165
Percentage of Executives to whom anti-corruption policies and procedures have been communication	%	100	100	100
Total Employees	No.	112	110	105
Total number of Employees to whom anti-corruption policies and procedures have been communicated		112	110	105
Percentage of Employees to whom anti-corruption policies and procedures have been communicated	%	100	100	100
Total Workers	No.	18	13	10
Total number of Manual Labourers to whom anti-corruption policies and procedures have been communicated		18	13	10
Percentage of Manual Labourers to whom anti-corruption policies and procedures have been communicated	%	100	100	100
Total Technicians	No.	326	306	301
Total number of Technicians to whom anti-corruption policies and procedures have been communicated		326	306	301
Percentage of Technicians to whom anti-corruption policies and procedures have been communicated	%	100	100	100

Business Partners	u.m.	2018	2019	2020
Total Suppliers	No.	894	877	894
Total number of Suppliers to whom anti-corruption policies and procedures have been communicated		894	877	894
Percentage of Suppliers to whom anti-corruption policies and procedures have been communicated	%	100	100	100
Total Business Partners	No.	151	151	149
Total number of Business Partners to whom anti-corruption policies and procedures have been communicated		151	151	149
Percentage of Business Partners to whom anti-corruption policies and procedures have been communicated	%	100	100	100
Total Collaborators	No.	17	14	18
Total number of Collaborators to whom anti-corruption policies and procedures have been communicated		17	14	18
Percentage of Collaborators to whom anti-corruption policies and procedures have been communicated	%	100	100	100

Governing Body	u.m.	2018	2019	2020
Members of the Governing Body		9	9	9
Total number of members of the Governing Body who have received anti-corruption training	No.	0	0	0
Percentage of members of the Governing Body who have received anti-corruption training	%	0	0	0

Employees	u.m.	2018	2019	2020
Total Executives		21	23	23
Total number of Executive who have received anti-corruption training	No.	17	3	16
Percentage of Executives who have received anti-corruption training	%	81	13	70
Total Managers		138	163	165
Total number of Managers who have received anti-corruption training	No.	0	12	159
Percentage of Managers who have received anti-corruption training	%	0	7	96
Total Employees		112	110	105
Total number of Clerical Employees who have received anti-corruption training	No.	0	10	97
Percentage of Clerical Employees who have received anti-corruption training	%	0	9	92
Total Workers		18	13	10
Total number of Manual Labourers who have received anti-corruption training	No.	0	2	10
Percentage of Manual Labourers who have received anti-corruption training	%	0	15	100
Total Technicians		326	306	301
Total number of Technicians who have received anti-corruption training	No.	0	21	287
Percentage of Technicians who have received anti-corruption training	%	0	7	95

The Internal Control and Risk Management System

ERM

In line with Article 7 of the Corporate Governance Code, the Company has adopted an internal control and risk management system (ICRMS) – understood as a set of policies, procedures and organisational structures – which seeks to contribute to sound and proper corporate management, consistent with the predetermined objectives, by identifying, measuring, managing and monitoring the main risks.

The ICRMS of Rai Way is integral to the organisational and corporate governance framework, as it is a key element of the entire corporate governance system and plays a central role in the organisation. The planning, implementation and upkeep of the ICRMS, as well as its periodic assessment, are based on the principles of the Corporate Governance Code and best practises, in compliance with the 2013 CoSO Report Integrated Framework (Committee of Sponsoring Organisations of the Treadway Commission, Internal Control, Integrated Framework), which represents the internationally accepted framework for integrated functioning, analysis and assessment of the ICRMS.

In the ICRMS area, Rai Way has implemented an Enterprise Risk Management (ERM) system in order to promote a risk culture, in terms of both threats and opportunities, following an integrated and inter-functional approach. In particular, the system pursues the identification, assessment and prioritisation of corporate risks, developing appropriate response actions and supporting management in making forecasts and strategic decisions.

The risk governance model adopted by the Company is based on an approach that is:

- **business-oriented**, as it provides relevant information on risk, uncertainty and opportunity factors, in order to support informed decision-making when defining objectives and strategies and monitoring performance;
- **enterprise-wide**, i.e., extended to all types of risks/opportunities potentially significant for Rai Way;
- **value-driven**, as it focuses on the risks/opportunities with the greatest impact on the strategic objectives and drivers of corporate value.

At the end of 2017, Rai Way also instituted an Enterprise Risk Management (ERM) Area, reporting to the Chief Financial Officer, conferring to the pre-existing Risk Management function a cross-function significance in the corporate risk management.

Non-Financial Risks and Management Methods

Below, grouped by risk areas for the purposes of Legislative Decree no. 254/2016, we are detailing the main risks to which Rai Way believes it is exposed at the date of preparation of this document, and the main safeguards that the Company has put in place in order to ensure compliance with the regulations in force and mitigate any sanctioning and/or reputational risks.

GRI 102-15

Areas pursuant to Legislative Decree 254/2016	Main potential associated risks	Description of the main measures
Governance	<i>Violation of internal regulations (non-compliance with the Code of Ethics, violation of policies/procedures/non-compliance with powers and delegations) and/or unlawful conduct to the detriment of Rai Way</i>	<i>The analysis of historical events did not show any cases of fraud on the part of Rai Way employees. Over the past 15 years, there have been 2 instances of employees being dismissed for conduct that did not comply with corporate procedures.</i>
	<i>Non-compliance in matter of Market Abuse</i>	<i>The risk according to the methodology adopted was assessed as unlikely. Additional mitigation actions relate to the establishment and regular updating of a register containing the names of persons in possession of privileged information.</i>
	<i>Non-compliance with the Law on the Protection of Savings and the guidelines for financial markets (Law 262/2005)</i>	<i>The Company has established a 262 Compliance Model. According to the assessment method adopted, the risk is low also because of the absence of findings and/or anomalies in relation to Financial Disclosure.</i>
	<i>Risk of data loss/alteration or leakage due to unauthorised access or cyber attacks</i>	<i>The Company has defined an action plan aimed at mitigating cyber security risks.</i>
Fight against Corruption	<i>Non-compliance with the regulations on the Administrative Responsibility of Entities (Legislative Decree no. 231/2001), including the risk of passive corruption</i>	<i>The Company has defined its own Organisation, Management and Control Model, pursuant to Legislative Decree no. 231/01, appointed its own Supervisory Body and began monitoring activities, as required under the 231 Compliance Model, in order to minimise risks.</i>
Environmental Concerns	<i>Inadequate management of environmental concerns</i>	<i>In addition to ISO 14001 Certification, the Company was awarded ISO 45001 Certification, established an Integrated Management System and defined specific procedures for the management of environmental concerns.</i>
Social Concerns	<i>Inadequate management of occupational health and safety aspects</i>	<i>The Company has adopted a Health and Safety Management System, defined monitoring activities and employee training.</i>
	<i>Non-compliance with the General Data Protection Regulation (EU Regulation 2016/679)</i>	<i>The Company has established a model that complies with the provisions set out in the GDPR. The risk of non-compliance is also considered remote in light of the establishment of a permanent Working Group and internal procedures that define the roles and responsibilities of players involved.</i>
	<i>Non-compliance with labour law/staff regulations (e.g., failure to update mandatory training - Decree 81/2008)</i>	<i>The analysis of historical events did not show any cases of fraud on the part of Rai Way employees. Over the past 15 years, there have been 2 instances of employees being dismissed for conduct that did not comply with corporate procedures.</i>
	<i>Inadequate management of impacts resulting from electromagnetic fields</i>	<i>The Company has defined specific procedures for managing and monitoring the impact of electromagnetic fields.</i>
Human Rights	<i>n/a⁵</i>	<i>n/a⁵</i>
Staff	<i>Loss of key personnel / critical skills</i>	<i>The Company has defined a control system consisting of policies based on reward mechanisms in relation to results achieved.</i>
	<i>Inability/propensity to attract new talent</i>	<i>The Company has put in place policies to reward employees based on the conditions it fosters for its employees (TOP EMPLOYER).</i>
	<i>Inadequate/unsuitable quality of human resources available</i>	<i>The Company has defined specialised and manager training programs on a recurring basis.</i>

⁵ Regarding "Human Rights", in view of the Company's business activities and reference context, there are no specific risks applicable to this area.

The risks listed above, along with an indication of their probability of occurrence and the safeguards that ensure a very low residual risk, are part of the Company's risk index. The index is updated annually, but can be realigned in the event of changes to contextual factors that are internal and external to the organisation.

The corporate risks listed in the index are monitored by a variety of control levels set up by the Company (Risk Owner, Enterprise Risk Manager and Management Control, Audit, Control and Risk Committee and Board of Directors) within the framework of the overall Internal Control and Risk Management System.

The Company holds industry certifications and has established internal management systems that provide reasonable assurance that the residual severity of the risks listed is currently and prospectively contained.

Stakeholder Engagement and Materiality Analysis

Since 2017, Rai Way has been following a structured process aimed at measuring and reporting on non-financial issues.

In this context, a stakeholder engagement process was also launched, involving internal stakeholders, i.e., the most important corporate functions and some of the external stakeholders identified among the main suppliers and customers. Furthermore, in 2020, at the time the materiality matrix was updated, the Company decided to continue with the engagement of additional external stakeholders to identify the organisation's sustainability priorities.

Below are the categories of stakeholders identified by the Company: employees, representatives of the financial community, customers (Rai - Radiotelevisione Italiana, Broadcasters, MNOs) and suppliers. Stakeholder engagement was carried out on the basis of the international AA1000-Stakeholder Engagement Standard (SES), a framework that defines the principles that an organisation can use to identify and respond to sustainability challenges, with the aim of improving its performance over the long term.

Each stakeholder involved was asked to express the degree of relevance of the issues identified on the basis of internal and external analysis. Relevance was expressed by assigning a score reflecting one's perception of the influence that the proposed topic has on decisions taken in the context of one's relations with Rai Way.

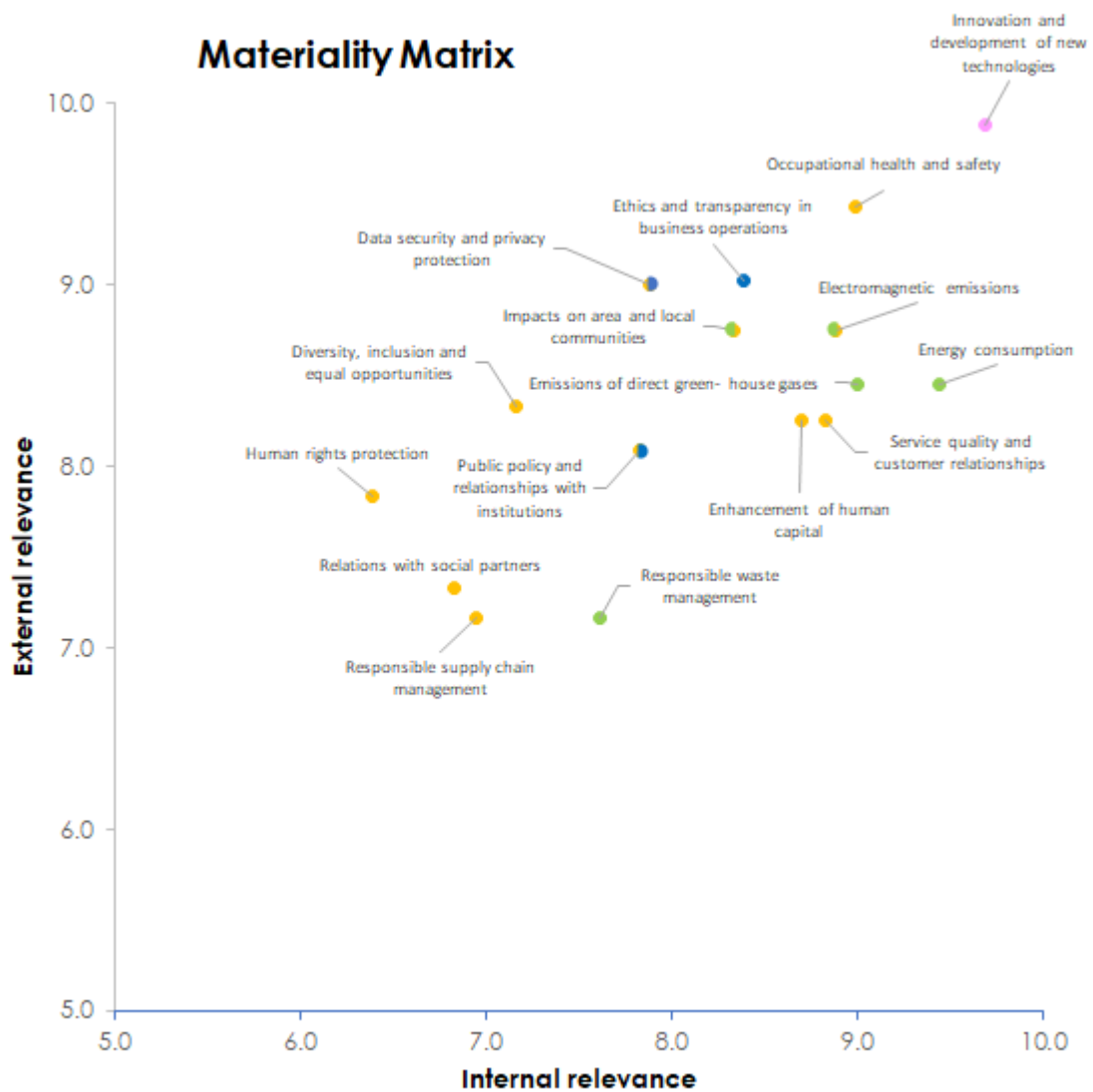
The stakeholder engagement process made it possible to collect the relevant requests, and subsequently build a materiality analysis process structured in accordance with the provisions of Legislative Decree no. 254/16 and GRI Standards. **The activities were also carried out with the involvement of the Control and Risk and Sustainability Committee, which carried out relevant preliminary activities with approval of the overall results by the Board of Directors on 18 March 2021.**

In particular, the process of defining the material themes for Rai Way was divided into three main phases:



A new theme related to innovation and development of new technologies was introduced in 2020, on the basis of the context of the sector and the opinion expressed by stakeholders, In addition to this introduction, it should be noted that Rai Way's material topics have been reshaped following an analysis of the main ongoing trends of peers and best-in-class, as well as the emerging demands of ESG questionnaires, such as MSCI, CDP and Sustainalytics.

The material issues identified in this way were traced to each of the Company's four key Sustainability Pillars.



The materiality matrix underscores four areas of focus for the Company (Governance, Environment, Social, Innovation), which will be discussed in detail in the paragraphs below.

The 16 material issues for the Company are listed below:

Material issues	What this means for Rai Way
Energy consumption	<i>Ensure the adoption of concrete solutions for the efficient management of energy resources, such as the purchase of renewable energy, and the reduction of consumption attributable to the performance of its activities, with the aim of substantially limiting the environmental impact.</i>
Diversity, inclusion and equal opportunities	<i>Value the elements of diversity, promoting the creation of an inclusive work environment, ensure</i>

	<p><i>all employees equal opportunities in their professional paths, and guarantee the absence of any form of discrimination such as: age, gender, sexual orientation, race, disability, language, nationality, political opinions and religious beliefs.</i></p>
Greenhouse gas emissions	<p><i>Ensure the adoption of concrete solutions for the efficient management of energy resources, such as the purchase of renewable energy, and the reduction of emissions (GHG emissions and emissions of ozone-depleting substances) attributable to the performance of its activities, with the aim of substantially limiting the environmental impact.</i></p>
Electromagnetic emissions	<p><i>Rai Way has always very carefully checked the electromagnetic emissions from its broadcasting systems in order to ensure compliance with prevailing laws and protect both public and workers from the possible negative effects resulting from exposure to the electromagnetic fields.</i></p>
Ethics and transparency in business operations	<p><i>Conduct all business activities with transparency, promoting the principles of ethics at all levels of the organisation, with the aim of fighting corruption and building relationships of trust with all stakeholders through constant and effective dialogue.</i></p>
Responsible waste management	<p><i>Ensure proper waste management aimed at safeguarding the environment, progressively reducing the amount of waste destined for disposal, also thanks to continuous training and updating of internal staff on waste management methods, and encouraging the reuse and recycling of recoverable material.</i></p>
Responsible supply chain management	<p><i>Ensure responsible management of the supply chain, through the adoption of selection criteria based on the assessment of the ESG profile of suppliers, ensuring moral and reliable performance, and utmost attention to quality, safety and respect for the environment in the procurement process.</i></p>
Impacts on area and local communities	<p><i>Consolidate its commitment to the community, endeavouring to contain noise and landscape pollution, and strengthening relations with the</i></p>

	<i>various players in the area with a view towards corporate social responsibility, through the implementation of initiatives that aim to contribute to the monitoring of social issues relevant to the community.</i>
Innovation and Development of New Technologies	<i>Leverage its technology assets and wealth of knowledge through a constant process of investment, innovation and training, through which it remains constantly projected towards the future of sector-relevant technologies. The constant investment in digital transformation and the rethinking of business processes from an innovative point of view, allow the Company to meet the challenges of the evolving market in which it operates.</i>
Public policy and relationships with institutions	<i>Promote a business management system oriented towards the definition of shared solutions and based on collaboration and transparent dialogue with institutions at national, regional and local level.</i>
Service quality and customer relationships	<i>Base business activities on a system of values centred on attention to the quality of service, promoting constructive relations with customers and the continuous satisfaction of their expectations, pursuing a path of continuous improvement of systems and business processes.</i>
Relations with social partners	<i>Operate by maintaining an ongoing dialogue with trade unions and industry organisations, ensuring full functionality of work organisation models through agreements with social partners at national and local levels.</i>
Health and safety at work	<i>Adopt policies and measures aimed at protecting the physical and psychological integrity of employees, through constant monitoring of current and potential risks in order to limit and prevent accidents in the workplace.</i>
Data security and privacy protection	<i>Set up IT security management systems capable of ensuring the protection of the Company's information assets and guaranteeing the protection of customer privacy, also through the creation of training courses on the processing of personal data addressed to those involved.</i>

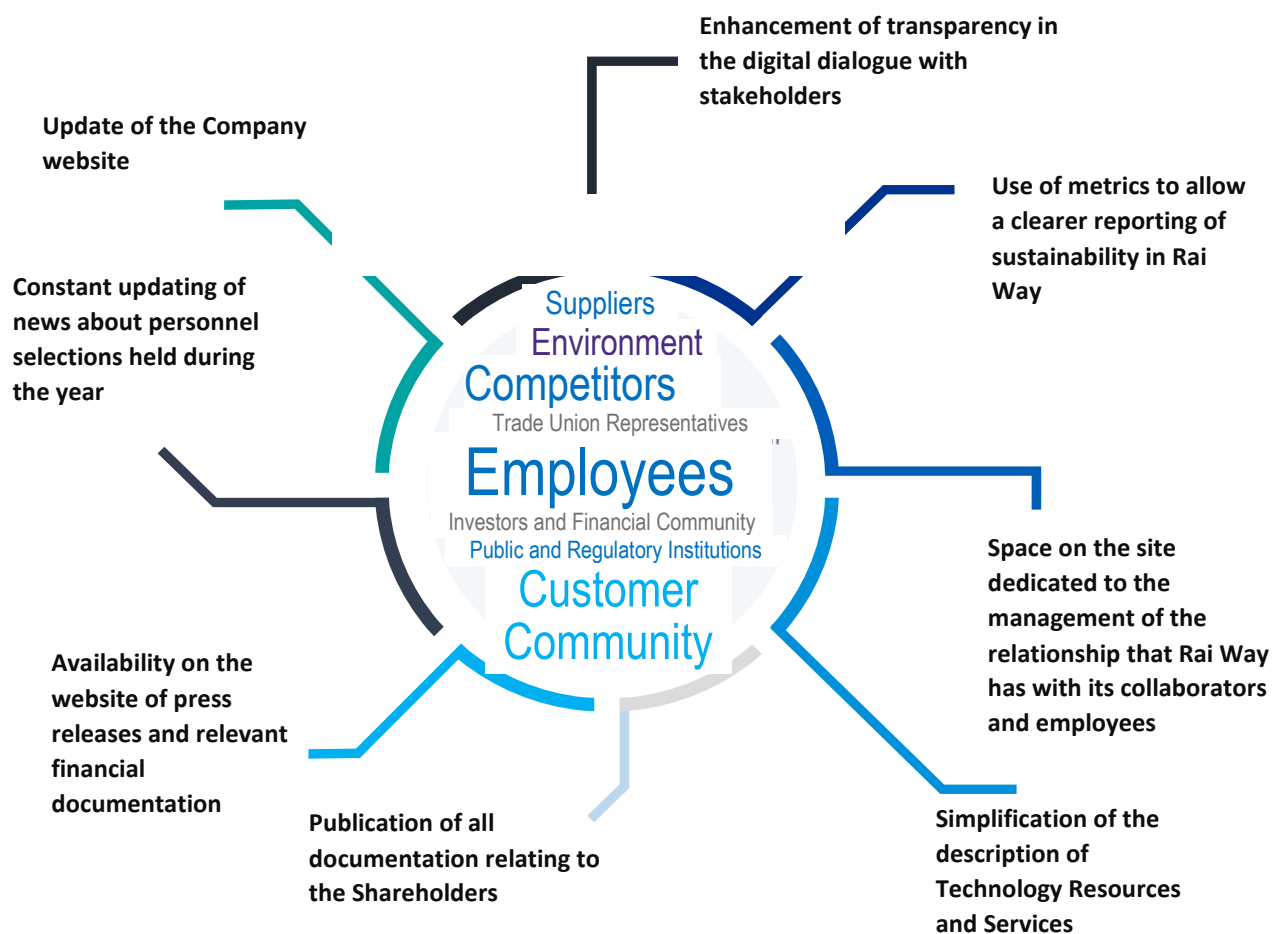
Human rights protection	<p>To guarantee the protection of human rights in a concrete manner inside, outside and along the entire value chain of the Company, consolidating a corporate culture opposed to all forms of violence and discrimination, in order to safeguard the dignity and freedom of individuals.</p>
Enhancing human resources	<p>Ensure high human resource management standards, adopting appropriate processes for the recruitment, selection and turnover of employees, and providing the tools needed to ensure the well-being and realisation of the full potential of employees through the implementation of training programs aimed at the continuous development of knowledge and skills.</p>

Relations with Stakeholders

Rai Way is committed to maintaining a constant dialogue with its stakeholders, represented, specifically, by Shareholders, the financial community, employees, the press and mass media, representative associations, business customers, end users and the local community. This dialogue is facilitated using different communication and awareness-raising tools.

The main instrument on which Rai Way's communication process and the relationship with its stakeholders is based is the corporate website www.raiway.it. The site includes the contents relating to the compulsory disclosure required by law for listed companies, supplemented by guidelines on the corporate strategy and the latest Rai Way news.

In 2020, drawing inspiration from the most significant experiences in corporate communication, Rai Way embarked on a path of improvement and integration of online contents, in order to make relevant information more accessible. The changes made as a result of this improvement process mainly concern the enhancement of the corporate portal, which was made possible by evaluating the Company's communication assets, a comparison with other industrial realities and the presence of a cross-cutting internal communication team. Below is a graphic illustration showing the main elements of the communication relationship between Rai Way and its stakeholders.



Participation in Associations and Events

Rai Way is a member of various trade associations and has a seat at the table of international representative bodies. The following table shows the main associations of which Rai Way is a member.

	UNINDUSTRIA	Union of Industrialists and Enterprises – Association on a regional scale belonging to the Confindustria system
	ASSONIME	Association of Italian Joint-Stock Companies - Association that deals with problems related to the development of the Italian economy
	ASSTEL	Assotelecomunicazioni - Association part of the Confindustria system that deals with the telecommunications chain
	ITU	International Telecommunication Union - International agency that deals with issues related to information and communication technologies. In particular, it is responsible for managing the standardisation of telecommunications and radio frequencies
	UNI	Italian Standards Agency - Italian body that deals with the development, publication and dissemination of standards and norms
	AIRP	Italian Association of Radio Protection - Association that deals with promoting initiatives for protection against ionising and non-ionising radiation
	AIDP	Italian Association of Personnel Management - Association intent on promoting a correct and conscious development of the role of human resources in companies

Rai Way also participates in different working groups at national and international level, within the framework of reference bodies and associations for issues related to the market in which it operates.

As far as political contributions are concerned, the Company does not make direct and/or indirect contributions to political causes either in Italy or abroad.

2021-2023 Sustainability Plan

Throughout 2020, among the major sustainability initiatives the Company has committed to, we demonstrate the process implemented to set out the first three-year (2021-2023) Sustainability Plan (hereinafter, also called the “Plan”).

Firstly, the Company identified areas for improvement and the relevant required actions following a gap analysis of three main ESG ratings (CDP, MSCI, Sustainalytics). Based on this, initiatives were drafted by the relevant department heads, which were subsequently revised and structured in the form of a Sustainability plan. The Plan was then submitted to the ESG⁶ Steering Committee for evaluation, which analysed its contents and feasibility. For the final stage of the process, the Plan was submitted to the Audit, Risk and Sustainability Committee (CCRS), which verified its consistency with the Company’s strategy and delivered its judgement to the Board of Directors, responsible for formal approval.

The responsibility for achieving the Sustainability Plan’s objectives lies with the heads of the departments involved, who have the required resources, tools and know-how to implement it.

The Plan will be monitored annually to report on the implementation status of initiatives and progress on objectives and targets, with the possibility of setting new goals in the interest of constant refinement, recognising that sustainability is not a final destination, but a journey of continuous improvement.

Rai Way has drawn up a Sustainability Plan with the intention of making its commitments to sustainable development explicit and therefore respond to global challenges, affirming its contribution to sustainable value generation for all stakeholders in the medium-long term.

The process for establishing the first Sustainability Plan was influenced by the following factors:

SDGs	2020-23 BUSINESS PLAN	MATERIALITY MATRIX	RATING ACTION PLAN
<ul style="list-style-type: none"> Set of 17 Sustainable Development Goals set out by the United Nations as a strategy for “a better, more sustainable future for all” Also known as Agenda 2030 	<ul style="list-style-type: none"> Outlines Rai Way's strategy, focusing on 1) strengthening Core Business 2) expanding managed infrastructures 3) maintaining discretion to opt for new uses of existing infrastructure Defines the sustainability strategy's 4 pillars: Environment, Social, Governance and Innovation 	<ul style="list-style-type: none"> Identifies issues relevant to Rai Way, which the Sustainability Plan and DNF will focus on Management and external stakeholder assessment results 	<ul style="list-style-type: none"> Aimed at improving Rai Way's positioning in terms of the main ESG ratings Contains the improvement actions identified after the ESG ratings analysis and subsequent gap analysis, shared with relevant structures

Rai Way’s first Sustainability Plan, approved by the Board of Directors:

- provides the Company’s response to global challenges drawing on the UN Sustainable Development Goals (SDGs).
- links objectives and targets to strategic guidelines consistent with Rai Way's business model, the Materiality Matrix and the Company's Sustainability Policy; and
- classifies anticipated ESG Rating Action Plan and 2020-2023 Industrial Plan actions, linking them to qualitative objectives/quantitative targets and operational initiatives with associated deadlines.

The result of the above process is a Sustainability Plan made up of strategic guidelines which aim to make clear the Company’s commitments to sustainable development and, as such, respond to global challenges,

⁶ The Committee was set up by the Company to provide analysis, strategic evaluation and support on corporate initiatives from an ESG perspective.





affirming its contribution to sustainable value generation in the medium-long term for all stakeholders, qualitative objectives, quantitative targets measured over time and operational initiatives for reaching such objectives/targets.

Over the years, Rai Way plans to progressively update the current Plan and implement its initiatives. Moreover, the reporting profile will be enhanced by additional Key Performance Indicators (KPIs), linked to reaching sustainability objectives, in line with the UNs Agenda 2030 Sustainable Development Goals (SDGs).







Throughout 2020, the Company developed the Plan based on an in-depth assessment of the Company's positioning compared with the main comparable operators (benchmarks) and the main ESG rating agencies' (MSCI, CDP, Sustainalytics) requirements. More generally, the Plan was aligned with preferences expressed by internal and external stakeholders as formalised in the Materiality Matrix.

The Sustainability Plan is broken down into 6 strategic guidelines, 20 objectives and 14 targets, which 33 operational initiatives areas are linked to, as shown below.

Rai Way's Sustainability Plan

SDGs	Pillar	Strategic guidelines	Qualitative objectives	Operational initiative Areas
	 THE ENVIRONMENT	Fight climate change and reduce our environmental footprint	Reduce energy consumption and become Carbon Neutral by 2025	Fine tune current emission monitoring and management system, with external assurance (adequacy assessment for Scope 1 and 2 and extension of Scope 3) Plan and implement emission reduction and electricity consumption initiatives, reducing the use of non-renewable energy sources
			Improving management systems to reduce environmental impacts	Update and adapt the Environment, Health and Safety Policy including by obtaining the ISO 50001 certification Establish identification, assessment and management processes for risks and opportunities arising from climate change Maintain the level of waste recycling at over 99% ⁷
			Disseminate a culture of environmental respect among stakeholders	Strengthen supplier and customer engagement activities for climate-related issues, through establishing policies and procedures that enhance the sustainability of the value chain Engage in activities that can influence public policy in relation to climate change
			Promote diversity and ensure inclusion	Comply with legal requirements for employing disabled people and protected groups Training and mentoring initiatives on diversity management, including on increasing the number of managerial positions occupied by
			Increase employee engagement	Conduct employee satisfaction surveys Introduce leadership development programmes and succession plans
			Ensure work-life balance	Flexible working model and other services (e.g., maternity leave, time bonus) benefiting work-life balance
	 SOCIAL CONCERNS	Promote the well-being and development of our employees		

⁷ Compared to total waste generated excluding septic sewerage (non-recyclable)

		<p>Contribute to social, cultural and economic development in our community and the area</p>	<p>Increase access to digital services</p> <p>Increase the commitment to socio-cultural initiatives benefiting the community</p> <p>Promote landscape impact reduction</p>	<p>Develop projects and services with social benefits for the area, including the refarming process</p> <p>Caring Rai Way model/system and develop awareness of ESG issues along the supply chain</p> <p>Collaborate with local institutions for potential facility merging</p>
		<p>Ensure high health and safety standards throughout the value chain</p>	<p>Ensure the monitoring of the corporate health and safety standards</p> <p>Promote health and safety culture at work</p> <p>Guarantee electromagnetic emissions auditing and compliance with regulations</p>	<p>Maintain ISO 45001 and monitor the Integrated Health, Safety and Environment Management System objectives</p> <p>Raise employee and supplier awareness of prevention and health and safety at work</p> <p>Maintain a management model for constant electromagnetic impact monitoring of own facilities and oversee processes facilitating emission systems' proper operation</p>
	 <p>GOVERNANCE</p>	<p>Develop and maintain governance system aligned to best practices and incorporated into sustainability profiles</p>	<p>Ensure respect for Privacy and Data Security</p> <p>Meet international ethics and anti-corruption standards</p> <p>Strengthen governance safeguards in sustainability</p> <p>Integrate sustainability principles throughout the supply chain</p> <p>Ensure managerial and auditor diversity</p>	<p>Further strengthen security safeguards around security of information systems</p> <p>Participate in UN Global Compact and consider other international memberships</p> <p>Strengthen the current safeguards for the governance of ESG issues at an internal and external advisory level (e.g., new Investor Relations & Sustainability role, CSR, virtual sustainability governance model);</p> <p>Introduce an LTI plan with 20% of ESG-related objectives</p> <p>Whistleblowing system with computerised reporting system</p> <p>Ensure environmental/social/ethical supplier standards are maintained and complied with, including through engagement activities (e.g. gathering ESG policies and information initiatives)</p> <p>Choose suppliers with an anti-corruption policy where compatible with relevant provisions</p> <p>Maintain adequate gender representation on the Board of Directors and Board of Statutory Auditors</p>
	 <p>INNOVATION</p>	<p>Develop technological innovation and contribute to our Country's digitalisation</p>	<p>Enable the company and stakeholders' digital evolution</p> <p>Invest in research and development for innovative infrastructure uses</p>	<p>Investments in Business Support System and Operational Support System platforms to support Digital Transformation</p> <p>Digitally upgrade existing infrastructures to enable 5G services (fibre back haul, edge data centre, DAS systems)</p> <p>Expand managed infrastructures and develop the business model for services on broadband platforms</p> <p>DTT Refarming Project</p> <p>Trial new platforms and innovative services (VR content encoding platforms, 5G network transmission systems, platforms using IoT technologies and drones)</p> <p>Research and develop new uses for existing infrastructure (e.g. VTOL drone logistics infrastructure)</p>

			Strengthen digital development skills	Develop a Digital Learning Hub, talent acquisition and digital skills strengthening model
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Plan's Targets

Pillar	Quantitative targets	Base value (2019)	Target year
Environment	<i>Carbon Neutral by 2025 (Scope 1+2)</i>	2,471 tCO ₂ eq	2025
	<i>Invest over € 100 million in investments in more energy efficient systems and equipment</i>	€ 8.3 million	2023 (cumulative)
	<i>100% of energy from renewable sources</i>	98.1%	2021
	<i>Maintain the recycling level of waste produced over 99%⁸</i>	99.3%	2021
	<i>executive cars 100% hybrid/electric</i>	8.7% ⁹	2023
Social Concerns	<i>35% of less-well represented gender in managerial positions¹⁰</i>	27.9%	2023
	<i>Performance Share Plan for Managers</i>	-	2021
	<i>Involvement of all staff (100% employees) in employee satisfaction surveys</i>	57.6%	2021
	<i>Configuration of a structural model of agile work for at least 45% of employees</i>	5%	2021
	<i>Improvement of the coverage of RAI thematic MUX for over 1000 Italian municipalities</i>	150 municipalities	2021
Governance	<i>Involve 80% of registered suppliers¹¹ in ESG issue engagement initiatives</i>	-	2023
	<i>Adopt an LTI plan with 20% of objectives ESG related</i>	-	2021
Innovation	<i>Invest approx. € 200 million in technological development and digital transformation projects</i>	€ 11 million	2023 (cumulative)
	<i>Involve all employees (100%) in digital skills training initiatives</i>	-	2023

⁸ Compared to total waste generated excluding septic sewerage (non-recyclable)

⁹ 2019 Figure

¹⁰ With reference to gender workforce

¹¹ Except for professional firms and similar types of legal entities

BOX: CARBON NEUTRAL

The European Union set three energy-climate targets for 2030, in line with the Agenda 2030 and the Paris Agreement. The EU developed the European Green Deal, a long-term strategy for becoming climate neutral by 2050.

As indicated in the Sustainability Plan 2021-23, Rai Way aims to become Carbon Neutral by 2025, 25 years in advance of the European target described above.

Carbon Neutral is the result of balancing greenhouse gas emissions generated with reabsorbed emissions.

Becoming Carbon Neutral therefore means taking responsibility for our own climate footprint and choosing to make our activities carbon free. Carbon Neutral is the final outcome of a process of measuring, reducing and compensating for CO2 emissions generated by products, services, organisations, events, etc.

Generated and distributed economic value

In 2020, Rai Way's revenues amounted to 224.5 million Euro, an increase of 3.1 million Euro compared to the previous period (+ 1.4%).

In 2020, Rai Way continued to consolidate its activities on the Italian radio and television transmission infrastructure market, as well as in other reference markets.

The financial information summary of Rai Way as of 31 December 2020 is shown below, compared with the results as of 31 December of the previous two-year period.

GRI 201-1 Direct economic value generated and distributed

Economic value	u.m.	2018 ¹²	2019	2020
Economic value generated	€	€ 217,877,003.00	€ 222,340,947.00	€ 225,045,351.00
Economic value distributed		€ 184,554,936.00	€ 181,361,482.00	€ 179,368,989.00
Suppliers		€ 52,087,435.00	€ 43,827,821.00	€ 41,423,007.00
Business partners		€ 46,070,318.00	€ 45,326,405.00	€ 46,470,551.00
Lenders		€ 1,240,582.00	€ 1,262,068.00	€ 1,145,619.00
Shareholders		€ 59,745,563.00	€ 63,360,973.00	€ 64,008,053.00
Inland revenue and local taxes		€ 25,411,038.00	€ 27,584,215.00	€ 26,321,759.00
Economic value held back		€ 33,322,067.00	€ 40,979,465.00	€ 45,676,362.00

The Company's revenues in FY 2020 amounted to 224.5 million Euro, an increase compared to the previous year.

Adjusted EBITDA is equal to 136.1 million Euro, and shows an increase of 4.8 million Euro compared to the 31 December 2019 value. The increase is mainly due to higher core revenues and a reduction in operating costs. The Company defines this measure as EBITDA adjusted for non-recurring expenses.

The ratio between Adjusted EBITDA and core revenues was 60.6% compared to 59.3% at 31 December 2019.

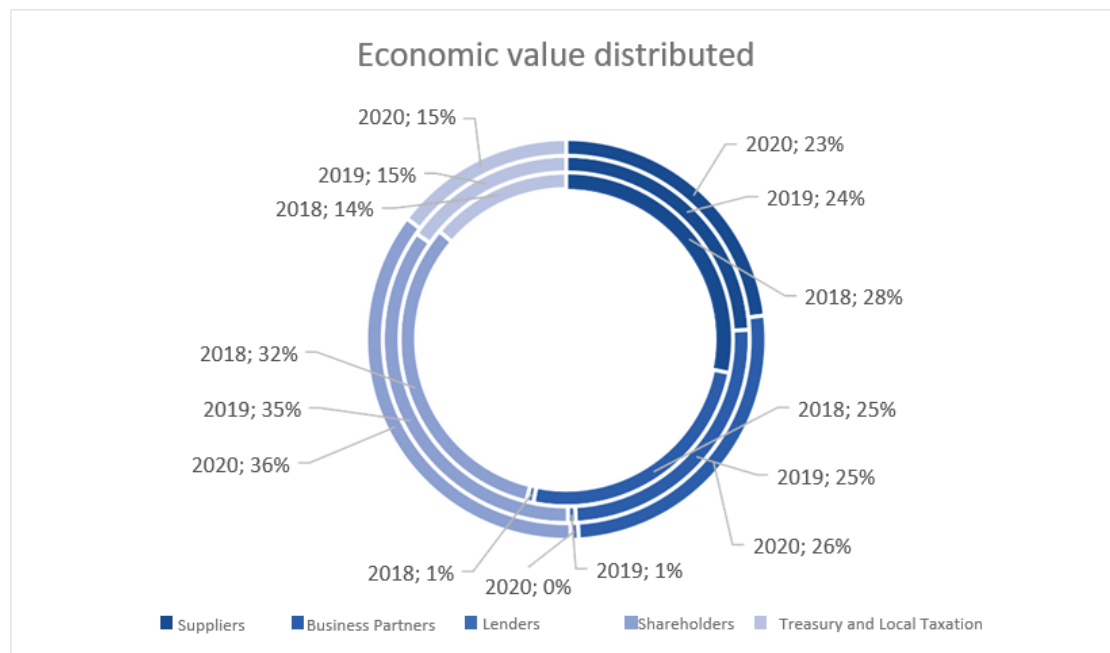
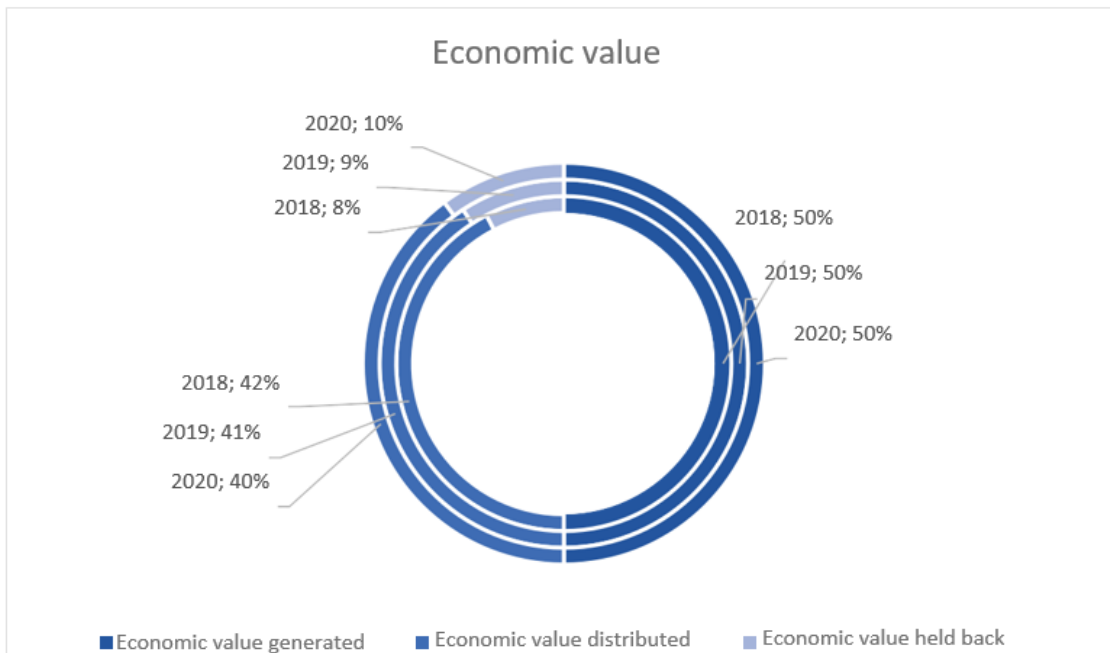
The Operating Result (EBIT) is equal to 89.4 million Euro, down by 0.8% compared to the figure recorded as of 31 December 2019.

The Net Profit was 64.0 million Euro, up 1% compared to 31 December 2019.

The Net Invested Capital is equal to 210.9 million Euro, with a Net Financial Position of 46.1 million Euro and a Shareholders' equity of 164.8 million Euro.

The following graph shows the economic value generated by Rai Way and distributed to internal and external stakeholders. The remaining part, equal to the profit for the year, net of what is distributed to Shareholders in the form of dividends, to which are added depreciation and provisions, expresses instead the value generated during the year retained within the company.

¹² To facilitate the comparison with the results from the same period of the previous year, we considered it appropriate to provide the financial data as of 31 December 2018 on a pro-forma basis, as if IFRS 16 had been applied as of 1 January 2018, since this is more representative for the analysis of the Company's financial performance.



During 2020, Operating Investments amounted to 56.3 million Euro (35.3 million Euro in the same period of 2019), of which 12.3 million Euro referred to the maintenance of the Company's network infrastructure (18.1 million Euro in the same period of 2019) and 44.0 million Euro in relation to the development of new commercial initiatives, a sharp increase compared to the previous year (17.2 million Euro).

The item does not include increases in financial fixed assets, for opportunistic initiatives and for leasing rights.

Maintenance investments, aimed at ensuring the highest levels of reliability and availability of the service, concerned the modernisation of the transmission network, the replacement of equipment dedicated to the radio service and the renewal and upgrading of IT systems. Development investments amounted to a total of 44.0 million Euro, of which 36.9 million Euro concerned activities relating to refarming and, in particular,

the project to extend the networks for the digital terrestrial television broadcasting service, as well as the launch of the digital transformation project aimed at implementing a new integrated IT platform in Rai Way.

<i>(amounts in million of Euro; %)</i>	2020	2019	Delta	Var.
Maintenance Investments	12.3	18.1	(5.8)	(32.0%)
Development Investments	44.0	17.2	26.8	155.4%
Total Capital Expenditure	56.3	35.3	21.0	59.4%
Other investments	10.3	1.2	9.1	742.9%
Total Investments	66.6	36.5	30.1	82.3%

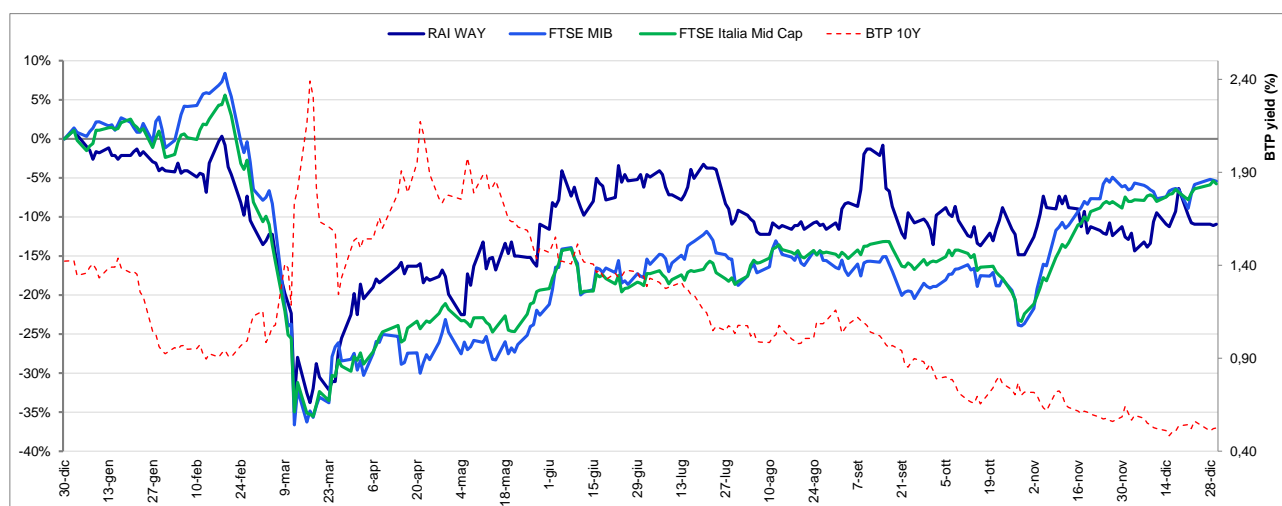
During the year, Other Investments amounted to 10.3 million Euro, of which 6.5 million Euro for IFRS16 leases and 3.8 million Euro (including capitalised ancillary expenses) for the purchase of a strategic transmission site for broadcasting coverage located in Valcava, in the province of Bergamo, including land and buildings, a 114-metre high metal lattice tower and a bridge tower.

After a positive 2019, 2020 saw a general downturn in economic activity due to the impact of the COVID-19 pandemic. To deal with the emergency, governments have taken a series of measures to support public health and the economy (e.g., the Recovery Fund with a budget of 750 billion Euro, of which 209 billion Euro earmarked for Italy), while central banks have reinforced their accommodating monetary policies, some of which were already in place (e.g., the 1,850 billion Euro PEPP programme implemented by the ECB). These, together with widespread optimism over the effectiveness of vaccines and the removal of uncertainty over the US election, led to improved conditions in international financial markets in the latter part of the year, with prices nevertheless remaining vulnerable to developments in the pandemic.

In this context, investor fears have penalised stock markets in Europe and Italy, where the pandemic impact has been intense and widespread, particularly in the first three quarters of the year. In 2020, the FTSE Italia All-Share index recorded a contraction of 5.6%, substantially in line with that of the FTSE Mid Cap (-5.8%).

During the year, the Rai Way stock, listed on the Italian Stock Exchange, recorded a 10.9% decrease (-7.1% adjusted for the distribution of the dividend), confirming its defensive nature during the most acute period of the pandemic and recording a more limited recovery compared to the indices in the last part of the year, which saw the market favour more cyclical sectors in the face of expectations of economic recovery following the positive trial of vaccines.

Rai Way closed 2020 with a capitalisation of approximately 1.485 million Euro.



The main market information is provided below:

Main market data

General figures	ISIN	IT0005054967
	Shares	272,000,000
	Floating	33.70%
Price (Eur, %)	Price on placement (19/11/2014)	2.95
	Price at 31/12/2019	6.13
	Price at 31/12/2020	5.46
	Performance as of 31/12/2020 vs. placement	+85.1%
	Performance at 31/12/2020 vs. 31/12/2019	-10.9%
	Maximum price (closing) in 2020	6.20
Minimum price (closing) in 2020	4.06	
Volumes ('000)	Average volumes in 2020	191,199
	Maximum volumes in 2020	2,514,906
	Minimum volumes in 2020	11,379
Capitalisation (€ million)	Capitalization on placement (19/11/2014)	802.4
	Capitalization at 31/12/2019	1,667.4
	Capitalization at 31/12/2020	1,485.1

The impacts on EBITDA from the events generated by COVID-19 were manifested in terms of a limited contraction in revenues more than offset by a reduction in the variable component of operating costs.

INNOVATION

Rai Way considers innovation, research and digital transformation to be strategic levers for enhancing know-how and technological assets and promoting sustainable change.

The guiding factors for the development of Rai Way's new business models, capable of creating value for stakeholders in a perspective of full sustainability, are disruptive innovation and growth of know-how.

For this reason, Rai Way experiments with an Open Innovation approach, which is based both on dialogue with all internal resources and on the search for synergies with the external ecosystem of universities, start-ups, research bodies, large consulting companies and supplier companies.

The Company is aware of the role that innovation has in the path of sustainable development and, for this reason, is committed to initiatives that affect the main lines of sustainability:

- attention to the efficient use of natural resources in the renewal projects of the various technological assets, through the evaluation of systems with high energy efficiency, aimed at the progressive reduction of consumption and operating costs and the recyclability of materials used, with a view to greater sustainability and eco-compatibility of plants;
- development of evolutionary infrastructures to improve the standard of living of the community through, for example, innovation and extension of services, to guarantee universal access to information and experimentation with the use of 5G technologies for innovative digital services for the community.

Innovation and Development of New Technologies

As a result of the importance attributed to the theme of “innovation and development of new technologies” by stakeholders, considering the centrality that this issue holds in the business in which Rai Way operates, the Company has planned to introduce specific strategic guidelines in the first Rai Way Sustainability Plan dedicated to the theme of innovation.

Innovation represents a central element for the achievement of the objectives of Rai Way's Industrial Plan to diversify the services offered in order to meet the constantly evolving needs of customers as well as to contribute to the digitalisation of the country.

[In line with its development and training principles, the Company is committed to supporting digital transformation, with a focus on enhancing the digital culture, enabling a deeper change in business and operational models in the face of new technological and business challenges.](#)

During 2020, consistently with the lines of development included in the Industrial Plan, the Company launched feasibility studies and analyses of synergy with respect to its assets, as it pertains to possible new services and reference, in particular, to *edge* infrastructures. Furthermore, technology scouting has been carried out in a number of fields in which technology is developing faster and more profoundly, and which are of interest to Rai Way, including a PoC (Proof of Concept), which is expected to be completed in 2021, of a radio infrastructure for the command and control of large autonomous drones piloted in BVLoS (Beyond Visual Line of Sight) mode.

BOX: 5G Testing (Bari-Matera)

The 5G testing (Bari-Matera) was completed in 2020; it consisted of the development and final presentation to MISE of some use cases, such as the television contribution and the monitoring and control services of the cranes of the port of Bari using the 5G network and other innovative technologies such as 360° video shooting and reproduction systems, Virtual/Augmented reality systems, and image recognition systems using “artificial intelligence”, with the aim of making a concrete contribution to the development of the demand for innovative digital services.

The policies and procedures adopted and implemented by the Company to achieve its innovation objectives are summarised in Rai Way’s organisational model, which provides for an *ad hoc* Department for innovation and research that operates through its own resources and a dedicated budget. In order to make the work of the Department more effective, policies have been implemented aimed at making the supporting processes faster and more flexible, such as, for example, through specific procedures for the procurement of goods/services related to the activities of competence.

In particular, the Company launched a process of creating an internal and external ecosystem, which is functional to innovation, thus channelling internal creativity and enabling new ideas and skills. With reference to the external eco-system, we have gradually created a network involving:

- companies focused on innovation, with which we share experiences and skills that may lead to strategic agreements or partnership;
- start-ups, which may become suppliers of solutions or partners in specific projects, to which we have access directly or through university research centres, venture capital companies, consortia, other companies that manage start-up incubators and accelerators;
- research entities, agencies, consulting companies, which may provide support when testing new technologies and be partner when competing for Italian and international research contract;
- universities active in the research of innovative services and technologies;
- vendors, which may share an interest for specific technologies and the resulting experimental development, taking a share of risks and benefits.

Finally, among the management systems adopted to assess the achievement of objectives and to collect reports and complaints from stakeholders, we point out the use of project management reports within the innovation Department.

THE ENVIRONMENT

Rai Way takes into consideration the right balance between operational needs and environmental sustainability issues, carrying out its activities with constant attention to environmental protection. With the support of its own personnel operating in Italy and consulting companies, the environment is monitored and managed through a dedicated organisational structure.

The Company aims to foster a culture of environmental protection and stimulate conscious behaviours in the use of energy, while defining action plans for the efficient management of energy, water resources and waste with a view to a circular economy, in order to reduce its own ecological footprint.

On behalf of Rai, Rai Way guarantees the transmission and broadcasting of the public service radio and television signal in Italy and abroad, in compliance with its own Code of Ethics, the regulations in force and the internal procedures concerning environmental protection, as defined in the Environment, Health and Safety Policy. For 2020, in particular, Rai Way remained committed to maintaining the high operating standards achieved in order to avoid legislative non-compliance and any negative impact on the environment.

In 2020 the entire Environment and Safety Management System was re-certified by external body RINA, which issued the ISO 14001 and ISO 45001 certificates in November.

BOX: ISO 14001 CERTIFICATION

Since 2008, Rai Way has adopted the Environmental Management System certified according to ISO 14001 standards which, through internal procedures, facilitates the management of the environmental impact from work activities.

ISO 14001 standards offer valid tools to have a systemic approach to proper environmental management in order to:

- protect the environment by preventing or reducing negative environmental impacts;
- mitigate the potential negative effect of environmental conditions on the organisation;
- improve environmental performance in meeting regulatory requirements;
- monitor the life cycle of products and services from design to disposal.

Rai Way has certified its own management system in order to demonstrate its sensitivity and commitment to environmental protection; underline the commitment and responsibility of all personnel in matter of environmental protection; provide evidence of control and management of environmental risks; and, increase its competitive advantage on the market by strengthening its reputation as a sustainable organisation.

In 2020, Rai Way obtained the renewal of the certification of its environmental management system through a cycle of internal inspections carried out by internal staff, which involved all the Territorial Areas, in addition to sample checks carried out by an independent third party.

Energy consumption

The energy efficiency of the systems, in particular of the electrical, broadcasting and signal transmission systems, is one of the environmental issues to which the Company has devoted greater attention in recent years. The need to renew the systems in the various technological areas has led Rai Way to make an accurate assessment of the adoption of energy-efficient systems, aimed at a progressive reduction in consumption and operating costs, as well as the recyclability of the materials used with a view to increasing the sustainability and eco-compatibility of the systems. Thanks to technological innovations, today the main manufacturers of transmitting equipment offer systems to maximise energy efficiency and to maintain unchanged the radio-electric characteristics with a lower power consumption.

Direct energy consumption is mainly attributable to the following activities:

- Mobility: fuel for the use of corporate vehicles, including the volume related to vehicles for mixed use;
- Heating: diesel oil or natural gas, used for heating large plants where there is a frequent presence of personnel;
- Operation of generators: diesel fuel to power emergency generators that are activated in the event of power failure from the mains, in order to ensure the operational continuity of the equipment.

Indirect consumption essentially refers to electricity and represents the most significant share of total energy consumption. These are mainly attributable to the operation of signal transmission and broadcasting equipment and systems.

In 2020, the increased use of renewable energy sources for the supply of electricity was confirmed, with the aim of achieving a 100% green supply.

GRI 302-1 - Energy consumption within the organization¹³

Energy consumption of the organisation from non-renewable sources	u.m.	2018	2019	2020
Diesel fuel for heating systems and powering generators	litres	119,503.00	116,239.00	68,503.00
Diesel fuel to power vehicles used for employee services		461,652.00	502,582.00	461,925.00
Green petrol to power vehicles used for employee service		49,757.00	57,109.00	57,808.00
Electricity to power plants	Kwh	3,235,189.31	1,593,687.76	0
Natural gas for heating regional plants and hubs	3	0	10,685.00	8,841.00

Energy consumption of the organisation from non-renewable sources	u.m.	2018	2019	2020
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¹³ 2018 and 2019 figures have changed from those represented in previous Non-Financial Statements, as a result of the adoption of new calculation methodology using parameters provided by DEFRA.

Diesel fuel for heating systems and powering generators	<i>Gj</i>	4,302.00	4,184.00	2,508.00
Diesel fuel to power vehicles used for employee services		16,619.00	18,092.00	16,606.00
Green petrol to power vehicles used for employee service		1,593.00	1,828.00	1,851.00
Electricity to power plants		11,643.84	5,735.87	0
Natural gas for heating regional plants and hubs		0	373.00	309.00
Total consumption		34,157.84	30,212.87	21,274.00

Energy consumption of the organisation from renewable sources	u.m.	2018	2019	2020
Electricity to power plants	<i>Kwh</i>	79,718,382.70	82,284,615.20	84,852,119.00

Energy consumption of the organisation from renewable sources	u.m.	2018	2019	2020
Electricity to power plants	<i>Gj</i>	286,916.16	296,152.13	305,393.00

The increase in consumption is due, in particular, to the increased services offered by the Company during the year. As far as energy consumption is concerned, there was an increase in the consumption of electricity due to the activation of new services, while the reduction in diesel consumption was due to a lower use of both site heating systems and generators.

Lastly, the procedures adopted and implemented by the Company to achieve its stated objectives include the following: participation in the Consip Italy lot, within the time required to secure the desired quantity of energy from renewable sources, and the inclusion of high-efficiency requirements in the technical specifications of its products.

Greenhouse gas emissions

As expressed in the new Sustainability Policy, Rai Way is committed to adopting procedures for the controlled management and reduction of emissions in order to contain emissions of CO₂ and of substances considered harmful to the ozone layer. Rai Way uses renewable energy and relies upon cutting-edge technological assets capable of efficiently monitoring and managing energy consumption.

CO₂ emissions are mainly due to direct energy consumption, as for 2020 Rai Way, following the Consip convention for the supply of electricity, purchased energy from renewable sources with certificates of guarantee of renewable origin, for a share equal to 100% of its electricity consumption.

The quantities of CO₂ emitted, as reported for each year, were obtained by applying the conversion factors reported in the GHG reporting of the UK Government to the quantities reported.

GRI 305-1 -Direct (Scope 1) GHG emissions¹⁴

Direct GHG emissions (Scope 1)	u.m.	2018	2019	2020
Diesel oil (heating systems, power supply for generators)	tCO ₂ e	354.98	320.61	188.92
Diesel fuel (vehicle supply)		1,212.73	1,303.75	1,176.07
Petrol (vehicle supply)		109.62	126.16	125.33
Natural Gas		-	21.70	17.88
Refrigerant gases		14.60	97.90	73.84
Total direct GHG emissions Scope 1			1,691.94	1,870.12

Regarding Scope 1, in 2020 there will be a reduction in CO₂ emissions, in relation to the lower use of diesel fuel for heating plants and for owned vehicles.

GRI 305-2 - Energy indirect (Scope 2) GHG emissions¹⁵

Indirect GHG emissions (Scope 2) - Market Based*	u.m.	2018	2019	2020
Electricity from renewable sources (to power plants)	tCO ₂	0	0	0
Electricity from non-green sources (to power plants)		1,213.20	597.63	0
Total indirect GHG emissions Scope 2			1,185.00	601.00

Indirect GHG emissions (Scope 2) - Location Based**	u.m.	2018	2019	2020
Electricity from renewable sources (to power plants)	tCO ₂	31,107.59	31,454.36	31,819.55
Electricity from non-green sources (to power plants)		1,213.20	597.63	0
Total indirect GHG emissions Scope 2			31,107.59	31,454.36

*CO₂ emissions reported for the Market Based method were obtained by applying a conversion factor of 0.375 [KgCO₂]/kWh (value relative to the Italian national energy mix) to the quantities of energy not supplied by renewable sources.

**CO₂ emissions reported for the Location-based method were obtained by applying a conversion factor of 0.375 [KgCO₂]/kWh (value relative to the Italian national energy mix).

¹⁴ 2018 and 2019 figures have changed from those represented in previous Non-Financial Statements, as a result of the adoption of new calculation methodology using parameters provided by DEFRA.

¹⁵ 2018 and 2019 figures have changed from those represented in previous Non-Financial Statements, as a result of the adoption of new calculation methodology using parameters provided by DEFRA.

GRI 305-4 - GHG emissions intensity

GHG emission intensity	u.m.	2018	2019	2020
Total GHG emissions Scope 1	Kg CO ₂ e	1,691,936.00	1,870,119.00	1,582,040.00
Total GHG emissions Scope 2		1,185,000.00	601,000.00	-
Total Company revenues	€	217,727,000.00	221,388,000.00	224,463,000.00
Intensity of direct and indirect GHG emissions Scope 1 and Scope 1	<i>KgCO₂e/Revenue</i>	0.013	0.011	0.007

BOX: Rai Way S.p.A. joined the CDP (formerly, Carbon Disclosure Project) for the first time



CDP is an international reference agency that provides businesses, local authorities, governments and investors with a global system of environmental measurement and reporting. In 2020, 515 investors with \$106 trillion in assets asked thousands of companies to participate in the CDP's valuation questionnaires.

During 2020, as part of a broader engagement activity launched with the main ESG rating agencies, the Company participated for the first time in the Climate Change questionnaire promoted by the international non-profit organisation CDP, receiving certification of its commitment to providing disclosure of its environmental impact, a necessary starting point for implementing the strategy to monitor and reduce energy consumption and CO₂ emissions defined in the 2021-2023 Sustainability Plan.

By responding to CDP's climate change questionnaire, Rai Way has demonstrated transparency and accountability in monitoring progress towards a prosperous and sustainable future.

Stations and offices have air-conditioning units that use refrigerant gases. In order to monitor for gases that harm the ozone layer, the Company drew up a detailed regional map of the stations installed, with reference to the refrigerant gases contained therein.

All the air-conditioning systems are subject to regular maintenance by external qualified companies with specific F-Gas qualifications, in order to prevent any leaks and if necessary, intervene quickly to deal with any problems. The new regulations on refrigerant gases require maintenance companies to record all the work carried out on the machines in the F-Gas portal set up by ISPRA (Istituto Superiore per la Protezione e la Ricerca Ambientale).

We are providing below a Table summarising the quantities of refrigerants and any leaks due to maintenance/refills carried out in 2020:

GRI 305-6 - Emissions of ozone-depleting substances (ODS)

Emissions of ozone-depleting substances (ODS)	u.m.	2018	2019	2020
Type of refrigerant				
R 407 C	<i>tCO₂e</i>	14.60	33.12	71.13
R 410 A		0	13.20	2.71
R 422 A		0	51.58	0
R 407 A		n/a	n/a	n/a
R 427 A		0	0	0
Total Emissions of ozone-depleting substances		14.60	97.90	73.84

Finally, it should be noted that all repairs were carried out by personnel in possession of specific training and appropriate certification, and checks were carried out to monitor the effectiveness of maintenance.

Responsible waste management

Responsible waste management is in line with the Company's objective of fostering a culture of environmental protection.

Rai Way systematically monitors its own waste and, in particular, in the performance of its activities, in terms of office work and the management of transmission and broadcasting systems, it generates and produces waste that can be divided into the following categories:

CHART

Waste to be disposed of with urban waste,
which are collected by the public service and sorted according to criteria established by the Municipality.

Special non-hazardous waste
deriving from **office** activities (e.g. cartridges, toner, neon, etc.), which are sent for recovery or stored in special containers for disposal.

Special non-hazardous waste
deriving from **industrial** activities, such as decommissioned electrical-electronic equipment, iron and steel, disused fire extinguishers, bulky waste, mixed packaging, plastic, paper and cardboard, clothing, filtering materials, which are sent for recovery or deposited in special containers for disposal.

Special hazardous waste
consisting mainly of industrial materials (e.g., electrical-electronic equipment containing components and cables impregnated with hazardous substances, batteries, etc.), which are deposited and processed in accordance with current regulations.

As far as it concerns the impact of the waste produced by the Company, the most significant is liquid waste, such as battery acid.

GEL BATTERIES FOR LESS ENVIRONMENTAL IMPACT

In order to reduce and avoid the negative impact of lead batteries on the environment, Rai Way has arranged for the progressive replacement of obsolete lead batteries with more modern and performing gel batteries.

Rai Way adopts waste management policies aimed at maximising waste recovery; in fact, those that are not sent for recovery/recycling consist only of modest quantities of antifreeze liquids, sulphuric acid in solution (batteries), fluorescent tubes, mineral oil scraps and septic tank sludge from the collection tanks of the toilets of some stations (14.7% of the total waste produced in 2020).

For this reason, specific guidelines have been issued for the management of materials removed from stations, for which, once decommissioned, careful assessments are made on the possibility of repair, reuse or recovery of parts that are still functional. Once this analysis has been carried out, if no form of recovery is possible, the material is sent outside the Company, to specialised and contracted companies following verification of the necessary requirements. These provisions contribute to a constant reduction in the waste produced by Rai Way.

GRI 306-3; 306-4; 306-5 - Waste generated, diverted from disposal and directed to disposal

Composition of waste (*)	u.m.	2018			2019			2020		
		Waste generated	of which recovered	of which disposed	Waste generated	of which recovered	of which disposed	Waste generated	of which recovered	of which disposed
Paper	t	3,220	3,220	0	960	960	0	2,820	2,820	0
Plastic		60	60	0	80	80	0	4,371	4,371	0
Wood		600	600	0	0	0	0	2,710	2,710	0
Metals		47,590	47,590	0	41,285	41,285	0	45,476	45,476	0
Mixed packaging		4,300	4,300	0	2,510	2,510	0	5,497	5,497	0
End-of-life equipment		19,778	19,778	0	47,475	47,475	0	55,894	55,894	0
Lead batteries		6,645	6,645	0	25,525	25,525	0	26,845	26,845	0
Various materials (filters, cables, inert materials, oils, mixed waste, etc.)		2,249	2,249	0	8,212	8,212	0	19,719	19,396	323
Septic tanks sludge		41,650	0	41,650	45,845	0	45,845	26,380	0	26,380
Other liquids		207	0	207	827	0	827	1,980	570	1,410
Total waste			126,299	84,442	41,857	172,719	126,047	46,672	191,692	163,579

Total weight of hazardous waste recovered	u.m.	2018		2019		2020	
		On site	Off-site	On site	Off-site	On site	Off-site
Preparation for reuse	t	0	0	0	0	0	0
Recycling		0	0	0	0	0	0
Other recovery operations		0	9,801	0	29,193	0	31,727
Total		0	9,801	0	29,193	0	31,727
Total hazardous waste recovered			9,801		29,193		31,727

Total weight of non-hazardous waste recovered	u.m.	2018		2019		2020	
		On site	Off-site	On site	Off-site	On site	Off-site
Preparation for reuse	t	0	0	0	0	0	0
Recycling		0	0	0	0	0	0
Other recovery operations		0	74,645	0	96,854	0	132,852
Total		0	74,645	0	96,854	0	132,852
Total non-hazardous waste recovered			74,645		96,854		132,852

Total weight of hazardous waste disposed of	u.m.	2018		2019		2020	
		On site	Off-site	On site	Off-site	On site	Off-site
Landfill disposal	t	0	0	0	0	0	0
Incineration		0	0	0	0	0	0
Other disposal		0	203	0	819	0	1,337
Total		0	203	0	819	0	1,337
Total hazardous waste disposed of			203		819		1,337

Total weight of non-hazardous waste disposed of	u.m.	2018		2019		2020	
		On site	Off-site	On site	Off-site	On site	Off-site
Landfill disposal	t	0	0	0	0	0	0
Incineration		0	0	0	0	0	0
Other disposal		0	41,650	0	45,845	0	26,776
Total		0	41,650	0	45,845	0	26,776
Total non-hazardous waste disposed of			41,650		45,845		26,776

Additionally, the gradual reduction of the waste for disposal was encouraged by continuous training, by informing internal staff on how to manage waste, its classification and subsequent management and by encouraging the reuse/recycling of recoverable material.

BOX: RAI WAY TOWARDS BETTER WASTE MANAGEMENT

In 2020 there was an increase in the production of waste of approximately 11%, particularly for electrical-electronic equipment due to the renewal of transmission and broadcasting systems and the disposal of equipment in stock that can no longer be reused in view of the change in transmission standards. Despite this slight increase in waste generation, there was an increase in recovered materials in 2020.

On the other hand, the production of non-hazardous materials for disposal and septic tank sludge decreased (-65% compared to 2019), as a result of the limitation of on-site activities because of the COVID-19 pandemic.

The waste disposal process is monitored through the compilation of specific forms, which shows the categories of waste divided by EWC code and the collection of MUD declarations (Single Model of Environmental Declaration). This reporting also serves as an internal process for monitoring the quantities produced annually, as well as the disposal process.

This waste management process is monitored through both internal audits and audits carried out by external bodies for certification purposes.

REFERENCE REGULATIONS AND MANAGEMENT AND CERTIFICATION SYSTEMS ADOPTED

- Legislative Decree 152/2006 - Consolidated Environmental Act that replaces all previous environmental regulations and laws. Specifically, Part 4 of the Decree, which lays down the rules on waste management and reclamation of polluted sites.

- Ministerial Decree of 17 December 2009 - Establishment of the Waste Traceability Control System, pursuant to Article 189 of Legislative Decree no. 152/2006 and Article 14-bis of Decree-Law no. 78 of 2009 converted, with amendments, by Law no. 102 of 2009.
- Ministerial Decree no. 120 of 3 June 2014 - “Regulations for the definition of the powers and methods of organisation of the National Register of Environmental Managers, the technical and financial requirements of companies and technical managers, the terms and methods of registration and related annual fees”.
- Ministerial Decree no. 78 of 30 March 2016 - Regulation containing provisions relating to the operation and optimisation of the Waste Traceability System (SISTRI) in implementation of Article 188-bis, paragraph 4-bis, of Legislative Decree no. 152 of 3 April 2006.
- Law No. 12 of 11 February 2019, which converted Decree-Law no. 135/2018 on the “Urgent provisions on support and simplification for businesses and public administration”, which abolished the SISTRI.
- UNI ISO 14001:2015 Certification

Sustainable management of water resources

The Company aims to foster a culture of environmental protection and to stimulate conscious behaviour in the use of water resources, with a view to a circular economy and to reduce its ecological footprint. The use of water, considering Rai Way’s business, is mainly for residential use (e.g., toilets, heating system, etc.) - and for safety devices (e.g., eye wash).

Some stations do not have an independent water supply, others are directly connected to the public aqueduct and others are supplied by wells or springs. Given the modest extent of consumption, no specific policies have been drawn up for the management of this resource, but the Company’s broader environmental policies and management models are followed.

[Water consumption is periodically monitored using a data collection system that complies with the ISO 14001 certification standards.](#)

In 2020, water consumption was 3,552 m³, in line with the previous year. The substantial variance in consumption between 2018 and 2019 (-36.7%) is due to the fluctuations of maintenance activities involving staff at large TX centres.

In particular, it should be noted that the regions identified as water stress areas where Rai Way has significant water consumption are the following: Apulia, Sicily, Abruzzo, Lazio and Marche. In the remaining regions in which Rai Way operates, consumption is less significant.

GRI 303-3 - Water withdrawal¹⁶

Water use by sources	u.m.	2018		2019		2020	
		Non water-stressed areas	Water-stressed areas	Non water-stressed areas	Water-stressed areas	Non water-stressed areas	Water-stressed areas
Surface waters	mL	0	0	0	0	0	0
Groundwater		0.449	0	0.303	0	0.432	0
Sea water		0	0	0	0	0	0
Produced water		0	0	0	0	0	0
Third-party water resources		1.471	3.545	0.702	2.452	0.568	2.552
Total			5.465		3.457		3.552

Water use by sources - water-stressed areas	u.m.	2018	2019	2020
Surface waters	mL	0	0	0
Groundwater		0	0	0
Sea water		0	0	0
Produced water		0	0	0
Third-party water resources		3.545	2.452	2.552
<i>of which:</i>				
<i>Surface waters</i>		0	0	0
<i>Groundwater</i>		0	0	0
<i>Sea water</i>		0	0	0
<i>Produced water</i>		0	0	0
Total			3.545	2.452

Water use by sources	u.m.	2018		2019		2020	
		Freshwater (≤1,000 mg/l total dissolved solids) ^(*)	Other water types (>1,000 mg/l total dissolved solids)	Freshwater (≤1,000 mg/l total dissolved solids)	Other water types (>1,000 mg/l total dissolved solids)	Freshwater (≤1,000 mg/l total dissolved solids)	Other water types (>1,000 mg/l total dissolved solids)
Surface waters	mL	0	0	0	0	0	0
Groundwater		0,449	0	0,303	0	0,432	0
Sea water		0	0	0	0	0	0
Produced water		0	0	0	0	0	0
Third-party water resources		5016	0	3154	0	3120	0
Total			5.465	0	3.457	0	3.552

¹⁶ For the calculation of consumption from water-stressed areas, only regions with annual withdrawals greater than 100 mega litres were considered

Water discharges

In a limited number of stations there are discharges from toilets. In order to avoid contamination of the soil, most of the discharges have been placed on sealed tanks that are periodically emptied by a company in possession of the appropriate permits.

In stations where it has not been possible to build sealed tanks, discharges are made by sub-irrigation on the ground with permits issued by the competent bodies.

Finally, it should be noted that data relating to the wasted water from offices and sites of the corporate plants are not currently measurable and, therefore, available; however, they are aggregated with the data of Parent Company Rai.

SOCIAL CONCERNS

People

The distinctive features of the Rai Way action in the field of human resources management are expressed in a framework of constant attention to human capital, meant as a strategic factor for corporate growth, in a perspective that supports and favours the creation of value and the achievement of corporate objectives, while ensuring the sustainability of results and full employee engagement.

In 2020, as was also carried out in 2019, the following areas of action were consistently overseen:

- safeguarding the optimal and consistent sizing of the workforce perimeter;
- development of the Company's organisational model, in order to control the technological and business challenges currently underway, also through the implementation of virtual organisation models;
- constant evaluation of the results and behaviour expressed by the staff, enriched with instruments to reconcile the well-being requirements of workers;
- implementation of remote working organisational solutions and work-life balance options;
- qualified investment in both technical and managerial training;
- continuous process of industrial relations at national and local level, in order to seek appropriate and shared solutions;
- consolidation of openness to the social dimension of business, in addition to the active paths with universities, aimed at encouraging targeted internship and school-to-work experiences.

Within the framework outlined above, three additional areas of action were pursued during the year:

- promotion of recruitment, including digital ones, inspired by criteria that, while respecting equal opportunities and diversity, ensure a rich roster of human resources;
- attention to staff engagement, also through the promotion and development of internal climate surveys aimed at periodically surveying staff satisfaction, monitoring the results in correlation with the requests expressed;
- guarantee and enhancement of diversity and equal opportunities.

BOX: RAI WAY IS A TOP EMPLOYER IN ITALY FOR THE FIFTH CONSECUTIVE YEAR

Rai Way has confirmed its Top Employers Italia certification, as Employer of Choice, consolidating a process of attention and innovative implementation of HR policies and processes that once again confirms the Company's ability to provide the best working conditions, reconciling the needs of competitiveness and well-being of the organisation.

The Top Employers Institute, which annually certifies the excellence of the working conditions put in place by companies for their employees on a global level, conducted an in-depth audit of corporate practices in the human resources field, certifying the distinctive character of the Company's commitment and the HR function, with particular reference to the areas of investigation relating to Business Strategy, People Strategy, Leadership and the values of Ethics and Integrity.

GRI 102-8 - Information on employees and other workers

Employees (headcount)	u.m.	2018			2019			2020		
		Man	Woman	TOTAL	Man	Woman	TOTAL	Man	Woman	TOTAL
Total employees	No.	506	109	615	504	111	615	497	107	604
<i>Open-ended contract</i>		480	105	585	473	106	579	462	104	566
<i>Fixed-term contract</i>		10	3	13	8	4	12	12	2	14
<i>Apprenticeship</i>		16	1	17	23	1	24	23	1	24

Employees (headcount)	u.m.	2018			2019			2020		
		Man	Woman	TOTAL	Man	Woman	TOTAL	Man	Woman	TOTAL
Total employees	No.	506	109	615	504	111	615	497	107	604
<i>Full-time employees</i>		505	99	604	502	100	602	495	97	592
<i>Part-time employees</i>		1	10	11	2	11	13	2	10	12

Number of administered	u.m.	2018			2019			2020		
		Man	Woman	TOTAL	Man	Woman	TOTAL	Man	Woman	TOTAL
	No.	0	0	0	0	0	0	1	0	1

GRI 401-1 - New employee hires and employee turnover

Employees (headcount)	u.m.	2018			2019			2020		
		Man	Woman	TOTAL	Man	Woman	TOTAL	Man	Woman	TOTAL
Total employees	No.	506	109	615	504	111	615	497	107	604
<i>Younger than 30</i>		42	8	50	41	9	50	40	4	44
<i>Between 30 and 50</i>		226	70	296	223	69	292	221	69	290
<i>Older than 50</i>		238	31	269	240	33	273	236	34	270

Employees (headcount)	u.m.	2018			2019			2020		
		Man	Woman	TOTAL	Man	Woman	TOTAL	Man	Woman	TOTAL
Total new hires	No.	37	12	49	29	7	36	21	5	26
<i>Younger than 30</i>		25	3	28	16	4	20	6	4	10
<i>Between 30 and 50</i>		11	9	20	13	3	16	14	1	15
<i>Older than 50</i>		1	0	1	0	0	0	1	0	1
Rate of new hires	%	7.3	11.0	8.0	5.8	6.3	5.9	4.2	4.7	4.3
<i>Younger than 30</i>		4.9	2.8	4.6	3.2	3.6	3.3	1.2	3.7	1.7
<i>Between 30 and 50</i>		2.2	8.3	3.3	2.6	2.7	2.6	2.8	0.9	2.5
<i>Older than 50</i>		0.2	0.0	0.2	0.0	0.0	0.0	0.2	0.0	0.2

Employees (headcount)	u.m.	2018			2019			2020		
		Man	Woman	TOTAL	Man	Woman	TOTAL	Man	Woman	TOTAL
Total terminations	No.	26	9	35	32	4	36	28	9	37
<i>Younger than 30</i>		2	1	3	9	0	9	1	3	4
<i>Between 30 and 50</i>		5	7	12	7	4	11	8	2	10
<i>Older than 50</i>		19	1	20	16	0	16	19	4	23
Employee turnover rate	%	5.1	8.3	5.7	6.3	3.6	5.9	5.6	8.4	6.1
<i>Younger than 30</i>		0.4	0.9	0.5	1.8	0.0	1.5	0.2	2.8	0.7
<i>Between 30 and 50</i>		1.0	6.4	2.0	1.4	3.6	1.8	1.6	1.9	1.7
<i>Older than 50</i>		3.8	0.9	3.3	3.2	0.0	2.6	3.8	3.7	3.8

Business partners

Rai Way's human resources are a strategic asset that can help the Company achieve its goals. In this context, the Company has always encouraged actions aimed at improving its ability to manage human resources effectively.

BOX: COVID-19 EMERGENCY MANAGEMENT AT RAI WAY. IMPACTS ON OCCUPATIONAL HEALTH AND SAFETY, REMOTE WORKING AND POLICIES ADOPTED

Rai Way, with a view to reconciling the need for business continuity with the higher demands of guaranteeing and protecting the health of its workers, has implemented an articulated line of action to deal with the COVID-19 emergency. A "Rai Way Task Force" was set up to deal with issues relating to the management of resources during the emergency, as well as a dedicated HR department.

Starting from March 2020, an emergency agile work model was adopted for the Company's personnel enabled by tools and equipment, starting from a strategic configuration oriented towards balancing the safeguarding of the continuity of the Company's productivity and operations, with the objective of maximum protection of the health of personnel, supported by adequate risk mapping and operational action plans that are constantly evolving and being monitored.

Learning activities, both for management and operational staff, have been converted into e-learning activities, with in-person training being limited to specifically identified courses on health and safety at work, as warranted.

Constant communication to personnel of informative and training nature was ensured on the basis of the tools made available by the Group, available both on the RAI website in the section dedicated to COVID-19 and on Rai Way's dedicated Intranet site;

The solutions adopted have made it possible to combine continuity, efficiency and effectiveness of corporate performance with the primary objectives of protecting the health and safety of workers, and translating the risks associated with such a significant change in environmental and operating conditions into opportunities in terms of work organisation models and support tools.

BOX: NEW WAYS OF WORKING

Rai Way has set up a technical panel “New Ways of Working”, with an inter-functional composition, aiming at developing preliminary contributions to the analysis of enabling factors for the transformation process towards the stabilisation of post-emergency remote working methods. This analysis required the evaluation of the entire corporate ecosystem in terms of spaces, organisation and technological systems supporting work, logistics and training methods. In support of the analyses, the HR function set up special surveys on agile work, administered to both management and operational staff, as well as dedicated training sessions with various institutes (including SNA, PCM, POLIMI) on digital readiness.

Collective bargaining agreements and relations with trade unions

Rai Way promotes exchange and comparison with trade unions at national and local level, with a dual perspective of efficiency and enhancement, ensuring a constructive dialogue aimed at a constant understanding of the organisation’s needs.

BOX: COLLECTIVE BARGAINING IN SUPPORT OF THE EMERGENCY SITUATION

During 2020, the onset of the global pandemic linked to the spread of COVID-19 inevitably affected the typical dialectics of the dialogue with Trade Unions, requiring a constant and continuous information alignment with all the Social Partners. New guidelines have been launched between the Company and Trade Union Organisations, which have led to the consolidation of industrial relations, also to ensure full functionality of the models of organisation of work in Italy, on the basis of Agreements signed at national and local level.

Of particular importance is the agreement on the modification of the parameters relating to the Company’s Performance Bonus Award, valid for the 2019-2021 three-year period, which allowed the Company’s non-executive personnel to benefit from a collective economic incentive linked to Rai Way’s results, with independent corporate objectives resting upon the Company’s technical-productive specificities and competitive positioning.

In connection with this bonus mechanism, a welfare plan was implemented for all Company employees.

Furthermore, Rai Way promoted exchange and dialogue, at the local level, with the Unitary Trade Union Representatives, in order to better understand specific local dynamics and their requirements.

More specifically, at the end of 2020, 313 employees were registered with trade union organisations, equal to about 54% of the workforce.

100% of the Company employees is covered by collective labour agreements.

To protect workers, the Company defined specific policies that are differentiated on the basis of applicable circumstances, for example, in the event of closure/relocation of headquarters, in the event of occupational repercussions deriving from the implementation of innovative technologies and organisational models, and for individual and collective lay-offs and social safety nets.

GRI 102-41 - Collective Bargaining Agreements

Percentage of total employees covered by collective bargaining agreements	u.m.	2018			2019			2020		
		Man	Woman	TOTAL	Man	Woman	TOTAL	Man	Woman	TOTAL
Percentage of employees covered by collective contract agreements		100	100	100	100	100	100	100	100	100
<i>Total employees</i>	No.	506	109	615	504	111	615	497	107	604
<i>Employees covered by collective bargaining agreements</i>		506	109	615	504	111	615	497	107	604

Remuneration Policy

The Remuneration Policy supports the Company's strategies and objectives (in line with the development of Rai Way's 2020-2023 Industrial Plan), promoting the alignment of Key Managers' interests to the objectives of sustainable value creation for Shareholders. In particular, the individual performance of each Key Manager is assessed against individual objectives, based on the Key Performance Indicators ("KPIs"), which summarise economic-financial and competitive aspects, as well as processes, innovation and efficiency.

These aspects are differentiated according to the different skills and areas of operation of the recipients and established within the strategic perspectives of the Company, defined in the Industrial Plan, and the corporate positioning in terms of sustainability (environment/safety, social, governance and innovation) .

The key elements of the Management Compensation Policy are listed below:

- selectivity of the beneficiaries and internal consistency with respect to positions, areas of responsibility and activities performed;
- competitiveness with respect to salary ceilings of the market, through an analysis of the policies and practices of the main peers at national and international level, in order to guide and inform the corporate choices in this area;
- correlation with corporate strategies and principles, with variable remuneration brackets linked to both proof of generation of added value with respect to the goal levels expected and approved by the Board of Directors of the Company; and defined according to a "pay-for-performance" criteria, where performance is evaluated according to a number of different indicators which consider economic-financial aspects, competitive environment, efficiency and innovation of the internal process, and social dimension;

In general, the fixed component of the remuneration system is commensurate with the complexity of the role, the level of the position and the distinctive knowledge/skills required. The remuneration bracket of the Policy recipients is measured by means of benchmarks identified with the support of expert consultants and on the basis of the certified methodologies adopted by them to assess internal consistency and/or competitive adjustment, with possible measures implemented to attract, motivate and retain Key Managers.

The variable component is based on an annual time period and is finalised to reward the achievement, if not the surpassing of a combination of qualitative and quantitative objectives, which reflect the parameters set forth by the Board of Directors upon proposal by the Remuneration and Appointments Committee.

Chairperson, Non-Executive Directors and Independent Directors are not eligible to participate in variable annual or medium/long-term incentive plans.

Rai Way guarantees the constant managerial enhancement of results and behaviours expressed by its managers/clerical personnel/manual labourers by implementing a remuneration policy consistent with the best practices in the HR field in terms of talent strategy, remuneration and benefits. In addition, by virtue of the Rai Way 2019-2021 Company Performance Bonus Award, personnel benefit from a collective economic incentive linked to the achievement of corporate objectives, also of qualitative nature.

GRI 405-2 - Ratio of basic salary and remuneration of women to men

Employees (headcount)	u.m.	2019*			2020*		
		RAL Man	RAL Woman	Woman/Man ratio	RAL Man	RAL Woman	Woman/Man ratio
Executives	€	136,186.63	125,861.40	0.92	135,941.11	126,197.00	0.93
Managers		57,601.65	60,403.20	1.05	56,982.89	61,670.55	1.08
Employees		34,862.92	34,986.80	1.00	35,736.82	35,220.82	0.99
Manual workers		40,774.13		0.00	39,716.43	0.00	0.00
Technicians		39,607.82	40,155.38	1.01	39,993.66	42,892.11	1.07

* The RAL values expressed refer to base salary and do not include variables such as: Overtime, Bonuses, Awards, etc.

Employees (headcount)	u.m.	2020**		
		RAL Man	RAL Woman	Woman/Man ratio
Executives	€	176,812.53	151,571.20	0.86
Managers		64,456.12	63,488.74	0.98
Employees		36,883.18	39,910.38	1.08
Manual workers		49,399.35	0.00	0.00
Technicians		51,848.53	43,017.84	0.83

** RAL values expressed refer to total salary and include variables, such as: Overtime, Bonuses, Awards, etc.

Welfare

Rai Way is particularly keen to welfare and to issues related to the reconciliation of private and working life of its employees.

In particular, the Company's action on the work-life balance front involves a variety of initiatives: from the activation of agile work to the granting of leave of absence and part-time work, from the provision of extra hours paid on the occasion of special events or for specific family needs, to the configuration and implementation of innovative work-life balance tools, such as the annual "Time Bonus".

Rai Way also participates in the "company welfare" and "benefits" system adopted within the Group in favour of company personnel, with extension, where envisaged, to the family unit.

In this context, Rai's Collective Bargaining Agreement for Middle-Level Managers/Clerical Personnel/Workers, to which Rai Way is also subject, provides for benefits relating to health care, complementary social security and additional insurance coverage against professional and extra-professional accidents. In addition, there are also corporate agreements supporting the purchasing power of employees, for services at favourable conditions. For Rai Way employees, the possibility of converting the economic component of the Company performance bonus into welfare services is also envisaged through the dedicated platform, shared with the Parent Company Rai.

GRI 401-2 - Benefits provided to full-time employees that are not provided to temporary or part-time employees

Financial benefits	2018				2019				2020			
	Open-ended contracts		Fixed-term contracts		Open-ended contracts		Fixed-term contracts		Open-ended contracts		Fixed-term contracts	
	part-time (yes / no)	full time (yes / no)	part-time (yes / no)	full time (yes / no)	part-time (yes / no)	full time (yes / no)	part-time (yes / no)	full time (yes / no)	part-time (yes / no)	full time (yes / no)	part-time (yes / no)	full time (yes / no)
Life Insurance/Accident Insurance*	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Healthcare Assistance	Yes	Yes	No	No	Yes	Yes	No	No	Yes	Yes	No	No
Parental leave	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Pension (Supplementary Pension)**	Yes	Yes	No	No	Yes	Yes	No	No	Yes	Yes	No	No
Shareholding	No	No	No	No	No	No	No	No	No	No	No	No

* The Fasi, Fasdir and Assidai funds guarantee coverage for their members for healthcare expenses on a direct basis with the participating facilities or reimbursement of medical-healthcare services provided, also to supplement the National Healthcare Service. The Funds are increased by the Company and by contributions by the employees. In addition to the mandatory insurance, there is also insurance to protect workers against the risk of work-related accidents and non-work-related accidents that result in the death or total/partial permanent disability.

** The Craipi and Fipdrai Funds give their members pension benefits additional to the obligatory National Social Welfare Institute (INPS) pension and are topped up by the Company and by employee contributions.

BOX: RAI WAY TO SUPPORT PERSONAL TRAINING

Rai Way protects the right to study and facilitates the exercise of this right by granting hours of paid leave for exams, in compliance with the provisions of the Rai Collective Agreement for Middle Managers/Employees/Workers.

In particular, working students, including university students, who have to take exams are entitled to paid daily leave for all the days required to complete the exam, and, if they pass the exam, for the two days preceding it. A total of 20 days is allotted for the state exams required to award a high school diploma. Three days of paid leave are granted to students who have to discuss their thesis. For examinations related to Master's Degree programmes legally recognised by Italian Universities or similar post-graduate courses, a daily paid leave is granted for the day of the examination.

The Company identifies and promotes training courses that are useful for complying with professional refresher requirements provided by the professional Boards in which personnel are registered.

In addition, when granting leave of absence, requests to attend courses of study aimed at improving an employee's specific professional preparation are evaluated with a favourable eye, always compatibly with corporate needs.

Executive may benefit from the use of a company car and reimbursement of fuel costs incurred up to a maximum of 2,000 litres per calendar year, as well as from insurance policies and membership of a supplementary pension fund, which is governed by both the relevant national collective contracts and supplementary corporate agreements.

BOX: NEW WORK-LIFE BALANCE INSTRUMENTS, THE "TIME BONUS"

With the implementation of the "Time Bonus", Rai Way awards full-time permanent employees who have distinguished themselves in terms of value and quality of the performance, extra paid leave hours to be used within a certain time frame, for personal life requirements.

This initiative innovates the Company's bonus system, with an additional, non-monetary bonus instrument that returns to an employee the valuable time he or she has given the Company.

BOX: PARENTAL LEAVE

Parental leave is an optional period that is given to parents to take care of children in their first years of life and meet their emotional and relational requirements.

In 2020, 14 Rai Way employees benefited from parental leave: in 64.29% of cases requests were made by mothers and in the remaining 35.71% by fathers.

100% of the employees who benefited from parental leave returned to work and were still employed by the Company during 2020.

GRI 401-3 - Parental Leave

Cases	u.m.	2018			2019			2020		
		Man	Woman	TOTAL	Man	Woman	TOTAL	Man	Woman	TOTAL
Total number of employees who were entitled to parental leave		0	0	0	0	0	0	0	0	0
Total number of employees who took parental leave		7	17	24	9	15	24	5	9	14
Total number of employees who returned to work during the reporting period after taking parental leave	No.	7	15	22	9	14	23	5	9	14
Number of employees working 12 months after taking parental leave		10	15	25	7	14	21	9	14	23
Return rate after parental leave		100.0	88.2	91.7	100.0	93.3	95.8	100.0	100.0	100.0
Job retention rate after parental leave	%	0	0	0	100.0	93.3	95.5	100.0	100.0	100.0

Training

Rai Way considers the enhancement of internal talents an essential driving force for growth and a tool for active participation in the evolutionary processes of change.

Rai Way's training model is designed and implemented to ensure the continuous enrichment of the technical and managerial skills of its employees, and the constant alignment with regulatory requirements, within the framework of the technological and business challenges identified by the Industrial Plan.

Specifically, 2020 saw an increase in the adoption of the "e-learning" approach, with the creation of courses dedicated to strengthening soft skills, digital culture, strategic and market vision, as well as targeted coaching courses.

For Rai Way, the strengthening of digital culture is an enabling factor for broader changes to business and operating models in the face of new technological and business challenges

Specific training has also been developed for the Company's managerial staff through the activation of courses in Digital Innovation, Quality and communication and remote team management topics.

BOX: DEVELOPMENT OF EMPLOYEES' SOFT SKILLS

With reference to the strengthening of cross-cutting skills, Rai Way launched the second edition of the "Soft Skill" project with the involvement of approximately 88 resources from technical and staff areas. This project aims at expanding work vision and role awareness, as well as developing inclusive and proactive behaviours in the context of digital modernisation. The initiative was articulated in distance learning mode, with the support of a learning community that enhances the interactive potential of social platforms and allows the development of skills through an experiential and participatory approach.

Commitment to training is constant, with particular reference to training activities on health and safety in the workplace, the environment and specialist/linguistic knowledge, in line with market *best practices*.

BOX: AGILE WORKING AS A LEVER FOR INNOVATION

In partnership with the Presidency of the Council of Ministers, the National School of Administration and the Polytechnic University of Milan, Rai Way set up a training course dedicated to agile work as a lever for managerial and organisational innovation, also in the post-emergency phase.

In the area of health and safety, Rai Way upgraded the model for managing and monitoring the Company's training needs. Specifically, an information system was implemented to provide systematic and automatic control over learning initiatives in this area, which optimises the correlation between the request, delivery and monitoring of basic and refresher courses, aimed at an audience of recipients previously identified on the basis of specific roles and/or tasks.

The strategic management training plan also continued; its aim was to strengthen leadership, strategic and market vision and public speaking, and was enhanced by external and networking experiences.

In line with regulatory provisions, Rai Way has taken steps to update its personnel on the Organisational, Management and Control Model, pursuant to Legislative Decree no. 231/2001 and the Anti-Corruption Policy, launching a specific e-learning training course, with an initiative planned *ad hoc* for management personnel.

GRI 404-1 - Average hours of training per year per employee

Training hours by gender and category	u.m.	2018			2019			2020		
		Man	Woman	TOTAL	Man	Woman	TOTAL	Man	Woman	TOTAL
Executives	No.	676	318	994	802	274	1,076	505	242	747
Managers		1,721	330	2,051	3,548	692	4,240	4,215	1,272	5,487
Employees		484	1,010	1,494	1,388	1,377	2,765	1,476	2,191	3,667
Manual workers		295	0	295	16	0	16	96	0	96
Technicians		16,157	193	16,350	13,462	424	13,886	8,235	196	8,431
Total		19,333	1,851	21,184	19,216	2,767	21,983	14,527	3,901	18,428

Average hours of training by gender and employee category	u.m.	2018			2019			2020		
		Man	Woman	TOTAL	Man	Woman	TOTAL	Man	Woman	TOTAL
Total number of training hours delivered to employees	Hours	19,333	1,851	21,184	19,216	2,767	21,983	14,527	3,901	18,428
Total number of employees	No.	506	109	615	504	111	615	497	107	604
Average hours of training delivered to employees	<i>Hours/No</i>	38.2	17.0	34.4	38.1	24.9	35.7	29.2	36.5	30.5
Total number of training hours delivered to Executive Personnel	Hours	676	318	994	802	274	1,076	505	242	747
Total number of Executive Personnel	No.	16	5	21	18	5	23	18	5	23
Average hours of training delivered to Executive Personnel	<i>Hours/No</i>	42.3	63.6	47.3	44.6	54.8	46.8	28.1	48.4	32.5
Total number of training hours provided to Managers	Hours	1,721	330	2,051	3,548	692	4,240	4,215	1,272	5,487
Total number of Managers	No.	114	24	138	137	26	163	137	28	165
Average hours of training provided to Managers	<i>Hours/No</i>	15.1	13.8	14.9	25.9	26.6	26.0	30.8	45.4	33.3
Total number of training hours provided to clerical staff	Hours	484	1,010	1,494	1,388	1,377	2,765	1,476	2,191	3,667
Total number of clerical staff	No.	37	75	112	36	74	110	36	69	105
Average hours of training provided to clerical staff	<i>Hours/No</i>	13.1	13.5	13.3	38.6	18.6	25.1	41.0	31.8	34.9
Total number of training hours provided to manual labourers	Hours	295	0	295	16	0	16	96	0	96
Total number of manual labourers	No.	18	0	18	13	0	13	10	0	10
Average hours of training provided to manual labourers	<i>Hours/No</i>	16.4	0	16.4	1.2	0	1.2	9.6	0	9.6

Total number of training hours provided to technicians	Hours	16,157	193	16,350	13,462	424	13,886	8,235	196	8,431
Total number of technicians	No.	321	5	326	300	6	306	296	5	301
Average hours of training provided to technicians	Hours/No	50.3	38.6	50.2	44.9	70.7	45.4	27.8	39.2	28.0

Human Rights

The risk of discrimination against workers is mitigated by the obligation to comply with the Code of Ethics, Model 231 and other regulatory provisions of reference for the Company or to which the Company adheres.

In particular, in line with the principle of non-discrimination of diversity set out in its Code of Ethics, Rai Way ensures the creation of a work environment in which *“personal characteristics cannot constitute the prerequisite for discrimination of age, sex, race, language, nationality, political and trade union opinions and religious beliefs”*.

Furthermore, Rai Way protects its workers’ rights and promotes their physical and moral integrity through workplace environments and conditions that are consistent with best practices, in compliance with all current primary and secondary national regulations (which implement, among others, the ILO - International Labour Organisation - agreements, ratified by Italy, including all fundamental and governance conventions).

In terms of gender equality, Rai Way ensures the application of equal opportunities, first and foremost, in the make-up of the Company’s administrative and control bodies.

Female management roles are present in the Audit, Staff Area, Human Resources and Business Development and Staff Area Departments.

In terms of disability management within the Company, in

addition to complying with regulations on mandatory placements and on the compliance with specific hiring requirements, pursuant to Law 68/99, the Rai collective labour contract and internal provisions govern multiple support requirements for the rights of disabled people. Pursuant to this framework, maximum attention is paid to managing specific situations brought to the attention of the Human Resources Department, with adequate measures being taken according to the requirements of case at hand (for example, by designating covered parking areas at office locations, special leave for medical visits, etc.).

Moreover, in order to promote diversity, in addition to the regulatory provisions, Rai Way identified a dedicated organisational unit called *“Diversity & Community Relations”*, which reports directly to the CHRO Department.

Furthermore, in order to support non-discrimination policies, the Equal Opportunity Commission was set up in 2015, whose task is to contribute to the implementation of the principles of equality and equal opportunity between male and female workers in the Company.

In 2020, 100% of the Company population was involved in training opportunities on Rai Way’s ethical standards thanks to e-learning initiatives focused on Model 231 and the Anti-Corruption Policy

In 2020, 100% of the Company population was involved in training opportunities on Rai Way’s ethical standards thanks to e-learning initiatives focused on Model 231 and the Anti-Corruption Policy.

GRI 406-1 - Incidents of discrimination and corrective actions taken

Incidents of discrimination	u.m.	2018	2019	2020
Total number of incidents of discrimination	No.	0	0	0

BOX: RAI WAY AND “VALORE D” FOR THE PROMOTION OF DIVERSITY

Rai Way has entered into a partnership with Valore D, an association committed to gender balance and an inclusive culture in organisations and in Italy, in order to promote the implementation of inclusion and gender diversity policies and to encourage the sharing of good corporate practices and paths of dialogue with institutions.

BOX: RAI WAY PROMOTES TRAINING COURSES FOR THE CREATION OF AWARENESS ON THE THEME OF DIVERSITY

With the aim of supporting Italian schools in the process of transforming teaching, giving teachers and students the opportunity to become agents of change with actions that facilitate the orientation of students towards the professions of the future, Rai Way renewed its partnership with ELIS for the third year, in order to form a community of Role Models (female officials with STEM - Science, Technology, Engineering and Mathematics degrees), spokespersons and witnesses of the organisation’s values and openness to change, in a framework of alliance with the academic world for the promotion of STEM paths in favour of a gender rebalancing prospective.

Health and safety at work

In order to guarantee the health and safety of its employees and to avoid and mitigate significant negative impacts on health and safety at work directly related to its operational activities, products or services through relations of a commercial nature and relative dangers and risks, Rai Way has adopted an “Environmental Health and Safety Policy”, in addition to designing and delivering training courses for all personnel, in compliance with the regulations in force.

Regardless of the type of contract in place (employees, external economic operators, consultants, interns, etc.), all workers at the Company are covered by the Integrated Environment and Safety Management System (ISO 14001 and ISO 45001) as it pertains to environmental and safety concerns in shared spaces.

Health and safety training for workers, as well as specific personnel (e.g., Workers’ Safety Representative, first-aid personnel, etc.) is delivered by Rai Way in compliance with the regulations in force and, in particular, with the Agreements of the Permanent State/Regions/Autonomous Provinces Conference of 21 December 2011 (Official Journal of the Italian Republic no. 8 of 11 January 2012) and of 7 July 2016 (Official Journal of the Italian Republic n. 193 of 19 August 2016).

In 2020, the Company delivered 5,341 hours in the field of Health, Safety at Work and Environment, either e-learning or in-person, an increase of 68% compared to 2019. In particular, during the reporting period, training and education initiatives were carried out (where applicable) concerning the following topics

- First Aid Teams Training
- Worker Training
- First Aid Training
- Training of Workers’ Safety Representatives
- COVID-19 Emergency Course
- Safe Driving
- Introduction to ISO 45001-2018
- Lightning Hazards
- Working at height
- PES - PAV - PEI training
- Training for safety officers
- DUVRI [Consolidated Risk Evaluation Document] training
- Asbestos Hazards
- Noise Hazards
- Health and safety of workers abroad

In the event of accident, injury, “near miss” event or identification of a hazard, the Company has provided for specific communication procedures in order to intervene, manage and resolve and avoid the recurrence

of dangerous or hazardous situations. In 2020, there were 17 Work Safety representatives posted to Production Units. In terms of types of duties carried out, in 2020, the workers involved in professional activities that are associated with a high level of risk of accident, who work at height in electrical systems, drive corporate vehicles or are at occupational disease risks amounted to 261 (operating technicians).

GRI 403-8 - Workers covered by an occupational health and safety management system

Employees covered by the occupational health and safety management system	u.m.	2018			2019			2020		
		Men	Women	TOTAL	Men	Women	TOTAL	Men	Women	TOTAL
Number of employees covered by the system	no.	506	109	615	504	111	615	497	107	604
Total employees	no.	506	109	615	504	111	615	497	107	604
% of employees covered by the system	%	100	100	100	100	100	100	100	100	100

Employees covered by the occupational health and safety management system that is audited internally	u.m.	2018			2019			2020		
		Men	Women	TOTAL	Men	Women	TOTAL	Men	Women	TOTAL
Number of employees covered by the system	no.	29	3	32	66	2	68	65	10	75
Total employees	no.	506	109	615	504	111	615	495	109	604
% of employees covered by the system	%	6	3	5	13	2	11	13	9	12

Employees covered by the occupational health and safety management system that has been audited or certified by independent third parties	u.m.	2018			2019			2020		
		Men	Women	TOTAL	Men	Women	TOTAL	Men	Women	TOTAL
Number of employees covered by the system	no.	31	3	34	35	2	37	54	10	64
Total employees	no.	506	109	615	504	111	615	495	109	604
% of employees covered by the system	%	6	3	6	7	2	6	11	9	11

GRI 403-9 - Work-related injuries

Employees	u.m.	2018 ¹⁷			2019			2020		
		Man	Woman	Tot	Man	Woman	Tot	Man	Woman	Tot
Total number of recordable accidents	No.	5	1	6	9	1	10	9	0	9
on the job		4	1	5	9	1	10	9	0	9
commuting		1	0	1	0	0	0	0	0	0
Deaths resulting from accidents at work		0	0	0	0	0	0	1	0	1
on the job		0	0	0	0	0	0	1 ¹⁸	0	1
commuting		0	0	0	0	0	0	0	0	0
Total number of serious occupational injuries (excluding deaths)		0	0	0	0	0	0	0	0	0
on the job		0	0	0	0	0	0	0	0	0
commuting		0	0	0	0	0	0	0	0	0
Rate of recordable occupational injuries¹⁹		6.3	6.2	6.3	11.1	6.1	10.3	10.9	0	9.00
Rate of deaths due to occupational injuries²⁰		0	0	0	0	0	0	1.21	0	1.00
The rate of accidents at work with serious consequences (excluding deaths)²¹		0	0	0	0	0	0	0	0	0
Number of hours worked	Hours	792,644	162,525	955,169	809,928	162,819	972,747	826,589	172,220	998,809

Accidents by employee type	u.m.	2018			2019			2020		
		Man	Woman	Tot	Man	Woman	Tot	Man	Woman	Tot
Sprains, contusions and traumas	No.	3	1	4	6	1	7	3	0	3
Bruised-lacerated wounds		1	0	1	2	0	2	1	0	1
Bone fractures and lesions		1	0	1	1	0	1	3	0	3
Other causes		0	0	0	0	0	0	2	0	2
Total		5	1	6	9	1	10	9	0	9

Health-related surveillance is under the responsibility of Corporate Doctors, who are coordinated by the Chief Corporate Doctor, whose office is located at Rai's headquarters, on Viale Mazzini 14 - 00195 Rome. The tasks assigned to Corporate Doctors are envisaged by the regulations in force concerning the health surveillance of workers, with explicit reference to what is established by Art. 25, as well as by Articles 38 to 42 of Legislative Decree no. 81/08. Each Corporate Doctor is responsible for health check-ups of Rai Way workers

¹⁷ Following the update of GRI Standard 403: Health and Safety at Work (2018), a re-assessment of the 2018 figure was necessary.

Data include only injuries validated by the INAIL Agency, with the exception of:

1) communications within 3 days or less;

2) commuting accidents, if not related to events organised by the Company.

¹⁸ In relation to this accident, the Company immediately provided maximum collaboration to the competent institutional bodies for the reconstruction of the incident; the judicial authorities have begun an investigation, which is still underway.

¹⁹ Rate of recordable occupational injuries: (no. of recordable accidents at work/no. of hours worked) *1,000,000

²⁰ Rate of deaths due to occupational injuries: (no. of deaths resulting from accidents at work / No. of hours worked) * 1,000,000

²¹ Rate of accidents at work with serious consequences (excluding deaths): (no. of accidents at work with serious consequences (excluding deaths) / no. of hours worked) *1,000,000

in the assigned region(s). The Chief Corporate Doctor coordinates and harmonises health procedures and measures and the activities of Corporate Doctors assigned to the Occupational Medicine Service, in agreement with the Employer, his delegates and the Company's Prevention and Protection Service. The Chief Corporate Doctor and the Corporate Doctors, for areas under their respective purview, and, in any case, in coordination with the Corporate Health Service, update and keep the health protocols related to the health surveillance programme and connected to the activities carried out on Rai Way sites, and take part in the above-mentioned periodical meetings (pursuant to Art. 35 of Legislative Decree no. 81/08).

The aforesaid health surveillance programme may be subject to revisions and contain functional modifications to the specificities that will emerge, for the purposes of health and safety at work, during the analysis and assessment of risks, in relation to significant organisational and productive changes in the workplace and taking into account the most advanced scientific guidelines.

GRI 403-10 – Occupational health

Occupational diseases of employees	u.m.	2018			2019			2020		
		Man	Woman	TOTAL	Man	Woman	TOTAL	Man	Woman	TOTAL
Number of cases of occupational diseases recorded	No.	0	0	0	0	0	0	0	0	0
Number of deaths resulting from occupational diseases	No.	0	0	0	0	0	0	0	0	0

Rai Way indicator - Days of absence for trade union-related business and strikes

Days of absence for trade union-related business and strikes	u.m.	2018			2019			2020		
		Man	Woman	TOTAL	Man	Woman	TOTAL	Man	Woman	TOTAL
Days of absence for trade union-related business	No.	236.50	2.50	239.00	372.9	3.00	375.9	104.9	0	104.9
Days of absence for strikes	No.	0.00	0.00	0.00	0.00	0.00	0.00	0	0	0.00

Customers

With regard to quality of service and customer relations, the objective pursued during the year of reporting can be summarised as the enhancement of relations and points of contact with business customers and RAI users, for the continuous improvement of customer/user service processes.

Surveys were prepared and sent out in 2020 to customers in the business tower rental area and to customers in the business transmission area. In addition, the “Contact Centre” project was launched and the assignment of the supply for its implementation was announced.

A “horizontal” approach was adopted for the collection and management of feedback and business complaints, activating all areas of the commercial structure that come into contact with customers and, at the same time, enhancing the direct relationship that key accounts have with them.

The achievement of the objective is closely linked to the improvement of service processes. The enhancement of relations with customers has made it possible to gather feedback and information useful for the redefinition of Rai Way’s offer, the benefits of which will be evident in the coming years. In a preliminary way, it was possible to ascertain the appreciation of several customers through the feedback provided by them.

Finally, in terms of customer health and safety, in consideration of the nature of the services provided by Rai Way, there are no cases of non-compliance with regulations and voluntary codes regarding impacts on the health and safety of services during their life cycle, in line with what has already been represented with reference to previous years.

Privacy

Rai Way’s policy on issues relating to the processing and protection of personal data complies with the applicable provisions of the law, namely, in particular, with Regulation (EU) 2016/679 and with Legislative Decree no. 193/2006, as amended by Legislative Decree no. 101/2018, both in organisational terms and as it pertains to compliance with security provisions.

In particular, beyond the appointment of certain external data processors, based on relations with the Company, the internal organisational system provides for the appointment by the Data Controller²² of the so-called Designated persons, who are provided with detailed operating instructions and recommendations concerning compliance with the regulations, and are required to periodically update the portion of the processing register relating to their own corporate structure.

During 2020, an update of the analysis of the processes relating to the personal data management model was carried out and activities aimed at further improving the same processes were accomplished, including an update of the disclosures that the various Company Structures are required to submit to data subjects pursuant to the GDPR.

In particular, specific organisational, management and operational procedures have been prepared and/or updated to support the personal data security policy.

In this regard, internal procedural forecasts were adopted in 2020 and early 2021:

²² Identified, as in previous years, in the figure of the Chief Executive Officer.

- I. in order to further guarantee the security and integrity of the Company Information Systems with respect to the risks of destruction or loss of information, unauthorised access and unauthorised processing, also in compliance with current legislation on the protection/confidentiality of personal data, and, at the same time, the protection of the public image and reputation of the Company;
- II. in order to provide an overall guide, in terms of principles, requirements and general measures, in relation to the preparation, maintenance and updating (also with a view to further improvement) of the management model adopted by Rai Way for the processing of personal data, in order to preserve their confidentiality, integrity and availability in compliance with the applicable laws and the best practices adopted;
- III. with reference to due diligence methods relating to data controllers, pursuant to Article 28 of Regulation (EU) 2016/679.

The management systems adopted at corporate level in this area these were subject to internal audits that identified process improvement actions relating to aspects of minor importance.

Finally, concerning the collection of reports and complaints, Rai Way continues its monitoring of dedicated e-mail accounts.

GRI 418-1 - Substantiated complaints concerning breaches of customer privacy and losses of customer data

Privacy violation and data loss	u.m.	2018	2019	2020
Complaints received for breach of privacy	No.	0	0	0
<i>of which complaints received from third parties and acknowledged by the organisation</i>		0	0	0
<i>of which complaints received from regulatory bodies</i>		0	0	0
Leaks, theft of customer data, loss of identified customer data		0	0	0

MSCI Indicator - Privacy and Data Security Training

Percentage of employees who have received training on data security and/or privacy risks and procedures	2018	2019	2020
Total number of employees	615	615	604
Number of employees who have received training on data security and/or privacy risks and procedures	401	190	54
Percentage of employees who have received training on data security and/or privacy risks and procedures	65	31	9

Supply chain

In its contractual relations concerning the procurement of works, services and supplies, Rai Way avails itself of operators in possession of morality and reliability requisites that operate in compliance with the regulations and internal policies in force.

During the 2020 financial year, the Company operated in compliance with the provisions of public evidence pursuant to Articles 4 and 15 of the Public Contracts Code, pursuant to Legislative Decree no. 50/2016, with reference to activities performed for the benefit of Rai and, in any case, related to it, in the fulfilment of agreements specifically entered into force for the provision of public broadcasting services. On the other hand, as far as activities aimed at the realisation of commercial and industrial initiatives for the provision of services to third parties are concerned, as well as those aimed at meeting the Company's own and internal organisational and operational needs, including those related to operations on the stock market, Rai Way has operated under a private regime.

In continuity with previous years, there were no negative social impacts across the Company's supply chain in 2020.

With reference to the activities carried out under private law, in 2018 Rai Way adopted internal instructions governing procurement related to contracts not subject to public evidence. These instructions respect the fundamental principles of effectiveness, efficiency, competitiveness and transparency that inform all of the Company's business activities.

In the electronic communications sector, there are manufacturers and suppliers from geographical areas and countries that have not stipulated social assistance and protection agreements with Italy. In 2020 Rai Way did not finalise any agreement with them. If, however, the Company needs to entertain relations with such producers and suppliers, in line with the prescriptions of the Company's Code of Ethics, specific precautions would be adopted for the evaluation of the offers (e.g., OEPV criterion, consideration of merit qualifications in favour of producers and suppliers belonging to countries with which Italy has stipulated special assistance and social security agreements, etc.).

An extensive system of controls on suppliers also focuses on their morality and reliability, which may lead, in the most serious cases, to the exclusion of companies from tenders and, if necessary, to a report to the competent supervisory authorities, depending on the type of supply (ANAC and AGCM).

In procurement procedures, Rai Way favours the participation of local small and medium-sized enterprises in negotiations.

In order to participate in calls for tenders issued by the Company with the aim of identifying the best suppliers for each project and to avoid incongruous barriers to entry, constituted by the parameters imposed by the call for tenders, forms of temporary grouping of small and medium-sized enterprises are permitted (e.g., temporary joint ventures, as well as consortia, cooperatives, business networks, etc.). The calls for bids also ensure that bidders comply with collective bargaining agreements by providing that, as specified in primary legislation, the auction base or the amount at the heart of the negotiations be estimated as early as the design stage with a specific assessment of labour costs and the obligation to expressly indicate the latter in order to allow fairness checks aimed at excluding anomalous bids characterised by non-compliance with the contractual minimums established by collective agreements.

The Company also relies upon an e-procurement system which, over the years of operation, has made the procurement process fully traceable, with a reduction in procedural and negotiation times, lower charges for

suppliers and simplification of documents, which makes it possible to achieve efficiencies in terms of filing and disposal of paper supports.

GRI 204-1 - Proportion of spending on local suppliers

Percentage of procurement budget used for significant operating locations that is spent on local suppliers	u.m.	2018	2019	2020
Total supply used for significant operating sites		75,237,002.34	189,404,613.00	266,875,340
Procurement used for significant operating sites that is spent on Centralised Purchasing	€	68,079,406.10	182,539,272.00	257,448,472
Procurement used for significant operating sites that is spent on Local Purchases or other		7,157,596.24	6,865,341.00	9,426,869
Percentage of procurement used for significant operating sites that is spent on Centralised Purchasing	%	90	96	96
Percentage of procurement used for significant operations that is spent on Local Procurement or other	%	10	4	4

BOX: THE RAI WAY SUPPLIER LIST ALSO MAPS ESG POLICIES

In 2020, Rai Way has also activated and made operational the List of Rai Way suppliers both for architectural and engineering services for lattice towers, and for specific product categories related to contracts in the electronic communications sector, pursuant to Art. 15 of Legislative Decree no. 50/16.

In this regard, for the purposes of registration and permanence on the Rai Way List, each supplier is expressly requested to indicate the environmental and social policies adopted within its own organisation, as well as to follow the specific policies adopted by Rai Way on the subject. All suppliers contracted by Rai Way comply with the Code of Ethics of the Rai Group, with the Model of Organisation, Management and Control of Rai Way, pursuant to Legislative Decree no. 231/2001 and with the Anti-Corruption Policy, as well as with the requirements resulting therefrom, and any violation constitutes a reason for initial suspension and, in case of recidivism, possible removal from the List of Suppliers by virtue of an express termination clause in line with the provisions of Art. 1456 of the Italian Civil Code.

The Suppliers of Rai Way 2020

Rai Way manages its procurement requirements mainly at a central level, by way of its Procurement Department, as it pertains to needs related to network infrastructure maintenance, services, satellite capacity rentals, utilities, new development initiatives, rents and other expense commitments.

Procurement for the maintenance and operation of transmission and broadcasting sites and plants is also managed directly by dedicated departments across Italy, reflecting the evident decentralised nature on a regional basis that distinguishes Rai Way. In fact, these departments and facilities were entrusted with the management of purchases related to the immediate requirement to meet the operational needs.

The total value of contracts stipulated in 2020 is 266.9 million Euro, distributed among approximately 894 suppliers, mainly managed centrally by the Company's departments, with 96% of procurement.

BOX: COVID-19 DID NOT STOP THE PROCUREMENT PROCESSES

In 2020, the procurement process put in place ensured greater investments than in previous years, with particular reference to those connected with the “refarming” project for the transition to the new transmission system in DVB-T2 technology. This result was achieved despite the pandemic emergency that occurred during the year, which did not cause any interruption in the procurement processes and which, also in compliance with ANAC Resolution no. 312 of 9 April 2020, recommends tenders to be conducted and awarded remotely and underscores the efficiency of the e-procurement system used by the competent department.

Territory and Local Communities

The impact of refarming requires the activation of initiatives aimed at communities on a territorial scale, in order to explain its social and environmental effects.

Given its capillary presence in the territory and the awareness of its responsibility, not only economic but also of social and environmental nature, Rai Way has over the years strengthened its relationship with the various players in the territory, also in terms of corporate social dimension.

The Company operates through an articulated, extensive and complex broadcasting network that enables it to cover more than 99% of the population. Since the network is spread throughout the country, it is able to provide services on terrestrial and satellite platforms, using both analogue and digital technology, and to allow the simultaneous distribution and transmission of different contents in different areas of the territory, as well as to proportion the required capacity according to customer's needs.

Relations with the World of Training

In particular, the Company has consolidated its relationship with schools and universities to encourage young people to enter the labour market and support their growth.

During 2020, 4 internships were activated, of which 3 curricular and 1 extracurricular.

In 2020, Rai Way participated in two Career Days organised entirely in streaming mode.

In 2020, with a view towards continuing the cooperation started up with schools, Rai Way continued to implement its school-work programme.

BOX: RAI WAY AND YOUNG PEOPLE - RECOGNITION FROM THE ELIS CONSORTIUM

In a perspective of corporate social responsibility, Rai Way has consolidated over the years its relationship with schools and the academic world to encourage and increase the approach of young people to the labour market and support their growth in a path of school-work alternation and internship within the Company.

In this regard, the "School-to-Work Programme: the Way to the Future" project was launched for a new three-year period, involving six schools located throughout Italy.

Thanks to the co-design of educational plans with the teachers in charge, the "Maestri di Mestiere" instructors provide thirty hours of training each year and the most deserving students are offered the possibility of work experience through the "Summer JOB" and "Summer CAMP".

Electromagnetic Emissions

Rai Way is subject to a wide-ranging regulation at both national and EU level on the protection of the environment and health that, *inter alia*, establishes limits of exposure to electromagnetic fields, making it mandatory to adopt suitable measures to deal with harmful effects to the health of the public and to workers resulting from exposure. Compliance with laws and regulations represents, at any rate, one of the conditions to obtain and maintain the licences and permits for the installation of equipment releasing electromagnetic emissions.

In order to ensure compliance with the regulations in force on the subject and with the objective of protecting the population and workers from possible negative effects deriving from exposure to electromagnetic fields, Rai Way pays great attention to the monitoring of electromagnetic emissions deriving from its broadcasting systems

In Italy, the radio and television broadcasting service are carried out thanks to the emission of electromagnetic waves whose frequency ranges from a few hundred KHz to about 800MHz. From September 2021, the 700-800MHz band is scheduled to be abandoned in favour of 5G cellular service.

The breakdown is as follows:

- 526KHz-1620KHz Medium Waves (OM): amplitude modulation is used for analogue radio service and the DRM standard is used for some tests in digital radio;
- 88-108 MHz: the central part of the VHF band used for FM radio broadcasting and dedicated mainly to mobile reception;
- 174-230MHz: upper part of the VHF band used for both DAB-T digital radio and currently for DVB-T digital TV broadcasting;
- 470-800MHz: part of the UHF band used for digital terrestrial television broadcasting. The standard currently used in Italy is DVB-T, which will be abandoned in favour of DVB-T2 in June 2022. Between September 2021 and June 2022, the frequencies between 700MHz and 800MHz will be phased out.

In the radio-electric spectrum, these frequencies fall within what are defined as Non-Ionising Radiations (NIR), as their energy is insufficient to produce ionization of matter, as opposed to ionizing radiations (X rays, Gamma rays, etc.).

Rai Way's Experience on Electromagnetic Impact

The ICNIRP (International Committee Non-Ionising Radiation Protection) Guidelines, which establish the limits of exposure to non-ionising radiation for workers and the general public, are an international reference point for the assessment of exposure to electromagnetic fields produced by Rai Way's systems.

The ICNIRP Guidelines have also been taken up at EU level to draw up a regulatory framework to protect against exposure to electromagnetic fields both for the general public (European Council Recommendation 1999/519/EC) and for workers (European Parliament and Council Directive 2013/35/EC).

The Italian legislative system has fully implemented the European Directive for workers, while for the population it has imposed exposure limits that are more restrictive than the European legislation. In addition, the concepts of attention value (the same for all frequency bands, which must be observed in places with a continuous stay of more than 4 hours per day) and quality objectives (the same for all frequency bands, which must be applied “in intensely frequented areas” such as hospitals, schools, etc.) were introduced.

Rai Way’s work was strongly influenced by stringent Italian regulations that required the parties involved to equip themselves with measurement instruments suitable for the purpose.

Rai Way has always shown a particular commitment to comply with the regulations in force on the matter, optimising the solutions identified with respect to the commitments

deriving from its institutional mission of guaranteeing its service throughout the national territory with the primary objective of protecting the population and workers from possible negative effects deriving from exposure to electromagnetic fields, but also considering that compliance with the regulations represents one of the conditions for obtaining and maintaining licences and concessions for the installation of equipment with electromagnetic emissions.

The two fundamental tools for monitoring and reducing the impact of electromagnetic emissions and managing any criticalities were: the ISO 14001:2015-certified Environmental Management System and the ISO 45001-certified Workers’ Safety Management System. Should Rai Way detect that the thresholds imposed by law are approaching, it shall implement all the necessary precautions to comply with the relevant regulations.

BOX: RAI WAY PARTICIPATED IN THE DEVELOPMENT OF INSTRUMENTS FOR MEASURING ELECTROMAGNETIC FIELDS

Rai Way has been one of the main players in the development of the instrumentation required for such measurements and has participated in working groups for the definition of measurement standards at national and international level (CEI; Cenelec), thus acquiring an excellent know-how concerning measurement techniques, in particular of electric field, magnetic field and power density, as well as the impact of broadcasting systems on the environment.

BOX: MONITORING OF ELECTROMAGNETIC EMISSIONS

In light of the above, Rai Way is a reference company in terms of the process of measuring, site remediation and rationalisation of electromagnetic emissions in the broadcasting sector throughout Italy. In 2020, in addition to the systematic monitoring by technicians of the Regions on the territory, the Company carried out the following:

- 4 measurement interventions to verify the compliance of Rai Way’s emissions with the legislation in force regarding the exposure of the population to electromagnetic fields (Law 36/2001 and Decree of the President of the Council of Ministers no. 08/07/2003;
- 45 measurement interventions for the activation and post-activation of new DVB-T or DAB+ installations;
- 27 interventions for the zoning of workplaces, in compliance with the provisions of Standard CEI EN 50496, at Rai Way’s transmitting sites, including interventions for the verification of workers’ exposure to electromagnetic fields in offices.

Zoning interventions were carried out according to the provisions of the applicable law, Legislative Decree no. 159/2016, which came into force on 2 September 2016 to implement European Directive 35/2013/EC

and are in addition to the 23 carried out in 2017 and 2018, again including interventions in offices. In previous years, even without prevailing laws in the area (since the entry into effect of Directive 2004/40/EC was postponed on a number of occasions but never implemented) Rai Way had already begun zoning its workplaces pursuant to CEI EN 50499 and CEI EN 50496 (for a total of more than 30 settlements).

Actions taken to reduce the electromagnetic impact

Together with the monitoring of electromagnetic emissions, Rai Way has also carried out numerous interventions aimed at containing electromagnetic emissions. These interventions are implemented on different levels; specifically, the Company has committed to:

- a) assessing the NIR impact when designing stations and conducting checks at the time of commissioning;
- b) systematically monitoring by the Regions of the emissions of broadcasting installations, concerning population exposure, with the involvement of the Rai Way specialised personnel to inspect the most complex situations;
- c) managing NIR issues reported by the designated Entities;
- d) implementing remedial measures, as warranted;
- e) mapping workplaces to zone them according to International Regulations incorporated in Consolidated Law no. 81/2008, as amended by Legislative Decree no. 159/2016.

BOX: THE DESIGN OF BROADCASTING EQUIPMENT

High-tech instrumentation is the basis of Rai Way's radio-electric design of broadcasting systems. In particular, for this activity, in addition to commercial software, the Company uses specialised software developed on specifications defined by Rai Way itself. The software defines the size of a station (station power, number of antennas, cables, etc.) and synthesizes the diagram of the broadcasting antenna (environmentally-friendly design). This will make it possible to guarantee, even in terms of assessing any environmental impact, the correct value of the electromagnetic fields (CEM) both in the far field where the signal is directed, and in the near field close to the transmitting stations. In any case, Rai Way verifies in the field the real situation before and after the implementation of interventions, as a further guarantee together with the use of the appropriate software.

BOX: THE MONITORING OF ELECTROMAGNETIC POLLUTION DURING NEW ACTIVATIONS AND IN THE REFARMING PROJECT

Rai Way aims at complying with Law 259/2003 and amendments thereto, and related regional laws on electromagnetic pollution and radio-protection towards the population within the general framework of permits required for new activations and, in this specific case, within the framework of the refarming project.

In order to achieve this objective, Rai Way carried out the following activities:

- Formalisation of eight framework agreements aimed at producing the documentation required to obtain authorisation, with activities including background measures, the production of IEAs and any on-site measures;
- increase in the number of staff in the NIR measurement sector;
- periodic activity of the Go.Nir and Co.De.Nir Committees with review and updating of the procedures relating to them.

In order to achieve this objective, Rai Way has also adopted several policies and procedures and, in particular, has set up the internal Go. Nir. and Co.de.Nir Committees. The Go. Nir. Committee is the operational group that receives the problem report, analyses it and proposes one or more solutions to the Co.de.Nir. decision-making Committee. Based on the decisions of the latter, the Go.Nir. implements the required solution.

The Go.Nir and Co.De.Nir. Committees analyse problems also in the ERM area, defining any relevant corrective actions.

Other monitored impacts: acoustic and landscape

In addition to electromagnetic impact, Rai Way's business responsibly manages acoustic impacts, mainly determined by the noise of condensation units in air-conditioning, ventilation systems and emergency generators.

With specific reference to the cooling system of the equipment present at the stations, the propagation of the noise in the external environment is generated by the change of air through special helicoidal or centrifugal exhaust fans with direct expulsion, positioned on one of the perimeter walls of the masonry buildings or on the sheet metal walls of the shelters.

The territorial extension of the Company does not allow for a timely verification of the acoustic impact on all the organisation's sites; therefore, it was considered appropriate to use a "sample" method that made it possible to acquire data on noise emissions. By virtue of such sampling, the organisation gathered the information needed to plan and implement the following through the samples taken:

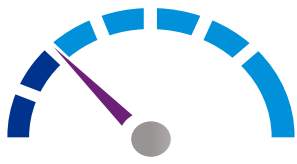
- plan for the detection of the acoustic impact for the most significant situations;
- plan to monitor situations that are significant for noise purposes;
- adjustment plan, as warranted, prepared and updated on the basis of the results of noise findings.

These plans, established through preliminary sampling, involve evaluation of the following criteria for defining the significance of a station:

- local context (potential presence of municipal acoustic zoning);
- environmental sampling (closeness of the stations to "sensitive" places such as homes, schools, offices, protected areas);
- sizes of stations (big, medium, small);
- breadth of sampling area.

Based on these criteria, Rai Way assessed the relevance of its stations.

BOX - ACOUSTIC RELEVANCE OF STATIONS



01

SITUATIONS OF PRIMARY IMPORTANCE

Stations that are close or <100 m from homes and/or public places in Class I areas, with reference to the Municipal Acoustic Zoning;



02

SITUATIONS OF SECONDARY IMPORTANCE

Stations that are close or <100 m from homes and/or public places in Class II areas, with reference to the Municipal Acoustic Zoning;



03

SITUATIONS OF TERTIARY IMPORTANCE

Stations that are in the same territorial framework as the previous ones, but in Class III or in Municipalities that have not adopted acoustic zoning. For the purpose of any acoustic impact, those situations, in the absence of zoning, could have weaknesses that are similar to situations of secondary importance;



04

SITUATIONS OF QUATERNARY IMPORTANCE

Stations at distances of more than 100 m and less than 200 m from homes and/or public places, regardless of what Class they belong to;



05

IRRELEVANT SITUATIONS

Stations situated in isolated areas, at more than 200 m, close to houses inhabited occasionally or used for seasonal purposes (agricultural).

Periodic monitoring activities take place on facilities with significance 1 - 3. Monitoring is carried out on 100% of the large and medium-sized stations, as well as for some small stations selected on a “random” basis.

It should be noted that, regardless of the situation of significance, the possible presence of internal and external signals makes the station subject to direct noise impact assessment.

The specific impact mitigation measures that are implemented from time to time are carried out by personnel with specific training and in possession of the necessary requirements.

No mitigation actions were required during 2020, as no critical issues were reported by internal staff or external complaints.

Limited fan replacements were performed as part of routine maintenance activities.

BOX: LANDSCAPE IMPACT

Rai Way carefully evaluates the impact of its facilities on the landscape and, where possible, carries out mergers until the available spaces are saturated, with the aim of reducing the proliferation of new towers. These towers, limited to technology currently available for the transmission and broadcasting of the radio and television signal, must have optical visibility between consecutive installations and, therefore, produce an interruption in the continuity of the natural landscape. Moreover, to further reduce the impact of such structures, when installing new antennas on existing pylons, and if technically possible, the broadcasting panels are protected by covers with colours that blend in with the surrounding landscape.

ANNEX

Connection Table

Material themes identified by Rai Way	Scope of Legislative Decree no. 254/2016	Topic-specific GRI Standards	Scope of impact	
			Internal	External
Energy consumption	Environmental Concerns	Energy (GRI 103, GRI 302-1)	Rai Way	<ul style="list-style-type: none"> • Community and Environment
Diversity, inclusion and equal opportunities	Concerns related to personnel management	Diversity and equal opportunity (GRI 103, GRI 405-1, 405-2)	Rai Way	<ul style="list-style-type: none"> • Employees and Trade Unions
Greenhouse gas emissions	Environmental Concerns	Emissions (GRI 305-1, GRI 305-2, 305-4, 305-6)	Rai Way	<ul style="list-style-type: none"> • Community and Environment
Electromagnetic radiation	Environmental and social aspects	-	Rai Way	<ul style="list-style-type: none"> • Community and Environment
Ethics and transparency in business operations	Social aspects, Corruption	Corruption-prevention (GRI 103, GRI 205-1, 205-2, 205-3), Compliance (GRI 103, GRI 419-1), Environmental compliance (GRI 103, GRI 307-1), Taxes (GRI 207-1, 207-2, 207-3, 207-4)	Rai Way	<ul style="list-style-type: none"> • Investors and financial community • Public regulatory institutions • Competitors • Customers • Suppliers
Responsible waste management	Environmental concerns	Waste (GRI 103, GRI 306-1, 306-2, 306-3, 306-4, 306-5)	Rai Way	<ul style="list-style-type: none"> • Community and Environment
Responsible supply chain management	Social aspects, Corruption	Freedom of association and collective bargaining (GRI 103, GRI 407-1), Procurement practices (GRI 103, GRI 204-1)	Rai Way	<ul style="list-style-type: none"> • Suppliers
Sustainable management of water resources	Environmental concerns	Water (GRI 103, GRI 303-1, 303-2, 303-3)	Rai Way	<ul style="list-style-type: none"> • Community and Environment

Impacts on area and local communities	Environmental and social aspects	Local communities (GRI 103, GRI 413-1)	Rai Way	<ul style="list-style-type: none"> • Community and Environment
Innovation and Development of New Technologies	Social Concerns	(GRI 103)	Rai Way	<ul style="list-style-type: none"> • Investors and financial community • Public regulatory institutions • Competitors • Customers • Suppliers
Public policy and relationships with institutions	Social Concerns	Public policy (GRI 103, GRI 415-1)	Rai Way	<ul style="list-style-type: none"> • Public and Regulatory institutions
Service quality and customer relationships	Social Concerns	Customer health and safety (GRI 103, GRI 416-1, 416-2)	Rai Way	<ul style="list-style-type: none"> • Customers
Relations with social partners	Concerns related to personnel management	Labour-management relations (GRI 103, GRI 402-1)	Rai Way	<ul style="list-style-type: none"> • Employees and Trade Unions
Health and safety at work	Concerns related to personnel management	Occupational Health and Safety (GRI 103, GRI 403-1, 403-2, 403-3, 403-4, 403-5, 403-6, 403-7, 403-8, 403-9, 403-10)	Rai Way	<ul style="list-style-type: none"> • Employees and Trade Unions
Data security and privacy protection	Social Concerns	Customer privacy (GRI 103, GRI 418-1)	Rai Way	<ul style="list-style-type: none"> • Customers
Human rights protection	Concerns related to personnel management	Non-discrimination (GRI 103, GRI 406-1)	Rai Way	<ul style="list-style-type: none"> • Employees and Trade Unions
Enhancing human resources	Concerns related to personnel management	Training and education (GRI 103, GRI 404-1, 404-2), Employment (GRI 103, GRI 401-1, 401-2, 401-3)	Rai Way	<ul style="list-style-type: none"> • Employees and Trade Unions

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Category: Economic performance

Economic performance

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Procurement practices

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On behalf of the Board of Directors
The Chairman
Giuseppe Pasciucco



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Headquarters: via Teulada, 66 -
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Share capital: € 70,176,000

Fully paid-up Chamber of Commerce, Industry,
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