UNIDATA S.p.A.

Individual non-financial statement according to Legislative Decree No. 254/2016

Sustainability Report as of 31 December 2020

SUMMARY

LETTER TO STAKEHOLDERS

GRI 102-14 102-21 102-52

Dear Stakeholders,

at the end of the year 2020, which marked an important moment in Unidata's growth and evolution, we decided to publish our Sustainability Report for the first time as a tool for presenting our commitments, strategies, organisational management methods and corporate results, each declined in their threefold economic, environmental and social aspects.

The Sustainability Report highlights our commitment to:

- the implementation of a new model of sustainable development, based on digital technologies, which embraces the principles of *ethical business* while respecting people and the environment;
- constant involvement and close cooperation with our stakeholders—an essential key to an efficient transition towards sustainable production and consumption patterns.

To align ourselves with the latest regulatory developments on non-financial reporting, we have chosen to adopt on a voluntary basis the provisions of Legislative Decree No. 254 of 30 December 2016, drafting our first Individual Non-Financial Statement (DNF).

The lockdown, triggered by the SARS-CoV-2 pandemic, has made the crucial role of telecommunications networks and the services offered by internet service providers even more evident. The web has become a virtual place for social, recreational, educational and productive activities and a preferred channel for citizens/businesses to interact with public administrations.

Despite uncertainties and difficulties, 2020 was a year of significant changes for Unidata. First and foremost, the company's listing on the AIM Italia segment of the Italian Stock Exchange on 16 March laid the foundations and allowed gathering the necessary resources to launch the development and growth plan for the years to come.

Given the current global context, in which balances are constantly shifting, and technological evolution is taking place at a fast pace, we consider it essential to respect sustainability issues for which it is necessary to implement a structured and organic path.

The Sustainability Report we have drawn up represents the first step in the process of **voluntarily integrating** the company's social and ecological concerns into its business operations and relations with stakeholders.

The intention is to illustrate the objectives achieved and those set by the Company through qualitative and quantitative indicators to pursue sustainable development, i.e., to ensure balanced *business* growth, with positive effects on all *stakeholders*, not only from an economic but also from a social and environmental point of view.

During this process, thanks also to the involvement of our employees, and by collecting the information presented in this document, we verified that sustainability is already a fundamental element of our values and our way of doing *business*.

We are confident that, by integrating sustainability issues within the company's dynamics, we will be able to achieve the ambitious goals we have set ourselves with greater effectiveness and awareness; we will also be able to contribute to the social and economic development of the communities in which we operate and face the challenges of the future with optimism, leveraging the values that have always distinguished Unidata.

Renato Brunetti

Chairman and CEO of Unidata

METHODOLOGICAL PREMISE

GRI 102-10 102-31 102-32 102-46 102-50 102-52 102-54

As a part of the undertaken sustainability path, Unidata has decided to voluntarily prepare the Individual Non-Financial Declaration (from now on also referenced to as DNF or Sustainability Report) following Articles 3 and 7 of Legislative Decree 254/2016 implementing Directive 2014/95/EU, to ensure maximum transparency for the market and its *stakeholders.*

This document aims to represent the company's performance and its results from a different and broader perspective than a purely economic one.

In particular, the impacts produced concerning the main sustainability themes of 2020 and the identified related main risks and how to manage them will be highlighted.

With a goal of continuous improvement, Unidata is implementing a policy of enacting the following procedures:

1. the principles of the Code of Ethics by which the company is inspired;
2. the main *compliance* models (primarily the Organisational Model according to Legislative Decree 231/01) already adopted, and risk management models (the Enterprise Risk Management Model) currently in the process of adoption;
3. the provisions of Legislative Decree 254/2016.

The individual non-financial statement for 2020 has been prepared following the GRI *Sustainability Reporting Standards* published by the *Global Reporting Initiative* (GRI).

The information and indicators to be reported have been selected starting from the results of the materiality analysis. This analysis identified the main issues considered material for the Company and its *Stakeholders*. The process of defining the contents of the Sustainability Report was based on the principles of materiality, completeness of data and context of the company's operations.

Specifically, the main elements of the document are as follows:

- **reporting standard**: our point of reference was the GRI Standards;
- **structure**: individual chapters of the Report addresses each of the group's material issues, and the structure is strongly inspired by the Sustainable Development Goals (SDGs);
- **non-financial risks**: risks related to sustainability issues considered material to the company have been mapped out, along with how they are managed;
- **commitments**: some of the SDGs shared by Unidata were reported, to which we believe we can make a greater contribution by defining the commitments set for 2021.

Concerning the quality of the information reported, the principles of balance, accuracy and comparability were followed.

This document is published on an annual basis and was submitted for examination, evaluation and approval by the Board of Directors of Unidata S.p.A. on 14 April 2021.

Given the voluntary nature of the adoption of this Individual Non-Financial Statement and, since the size parameters set out in Article 7 of Legislative Decree 254/16 have not been exceeded, the

Company has decided not to subject this document to certification compliance by an independent auditing firm.

The information provided in this Individual Non-Financial Statement complies with the provisions of Article 3 of Legislative Decree 254/16.

1 SUSTAINABILITY FOR UNIDATA

1.1 THE UNIDATA APPROACH

GRI 102-16

At all stages of its growth, Unidata has continuously pursued the objective of creating value for its stakeholders, which is a distinctive feature of socially responsible companies. For this reason, the company has recently decided to pay more attention to sustainability issues.

Digitalisation and sustainable development are central issues today that cannot be underestimated; digital transformation is an essential element in supporting a sustainable economy model, understood as a fair development environment in terms of skills, infrastructure and culture. This is a process in which all the players involved work together.

The digital transition holds great promise for the effective implementation of the Digital Agenda 2030 in areas as diverse as health promotion, education, decarbonisation of economic systems and the effective implementation of circular production and consumption models.

However, to realise these benefits, the sector must act to reduce its environmental impacts to ensure sustainable development for the planet.

1.2 STAKEHOLDERS

GRI 102-21 102-40

Stakeholder engagement is a process whereby companies take on board the changing perspectives and priorities of stakeholders, observing and integrating them where possible to be compatible with corporate objectives. It is essential to reconcile both sustainable development and the economic performance of a company.

Unidata's stakeholders are:

- Investors
- Lenders
- Shareholders
- Management
- Business Partners
- Suppliers, Contractors
- Local communities and the broader community
- Customers
- Employees
- Contributors

Figure 1"Unidata and its Stakeholders".

Our company operates responsibly, striving to create value for all stakeholders, who play a key role in the company's economic growth.

Unidata is also committed to involving stakeholders in its operations, ensuring that their views and needs are understood, thus pursuing economic, environmental and social objectives.

1.3 SUSTAINABLE DEVELOPMENT GOALS (SDGs)

The 2030 Agenda for Sustainable Development is an action programme for people, planet and prosperity, signed in September 2015 by the governments of the 193 UN member states. It encompasses 17 *Sustainable Development Goals (SDGs)* in a major action programme with 169 targets.

The Sustainable Development Goals (SDGs) official launch coincided with the beginning of 2016, setting the course for the countries involved over the next 15 years. The participating countries have committed themselves to achieve them by 2030.

The *Sustainable Development Goals* provide excellent guidance for setting corporate sustainability policies, with at least three levels being distinguished:

1. Reflection on the strategic framework in which our projects are evaluated and implemented.
2. Efficient identification of useful indicators to demonstrate the effectiveness of our projects.
3. Data collection platforms and databases created based on the SDGs are used to confirm our hypotheses and compare our indicators with the existing situation.

The seventeen objectives in the programme are:

Figure 2"The Sustainable Development Goals"

From the analysis of the priorities and interests examined, the objectives that Unidata intends to achieve, in line with its own activity, are:

Figure 3"Unidata and the SDG targets"

1.4 MATERIALITY ANALYSIS

GRI 102-29 102-43 102-44 102-46 102-47

The materiality analysis is the key process underlying the drafting of the Sustainability Report. It aims to select the "material" economic, environmental and social issues, i.e., the most significant for Unidata and its stakeholders. Therefore, the result of this analysis becomes the reference point for all the reporting activities to be carried out to prepare the Social Report.

To identify the most relevant issues, it was necessary to carry out a survey on the internal involvement of stakeholders and top management.

Stakeholders were given a specific questionnaire containing all possible sustainability issues that were considered to be relevant to the organisation's business sector and context.

The assessment of these issues was carried out, taking into account the four principles suggested by the *GRI Standards* guidelines in defining the most relevant aspects: materiality, the inclusion of stakeholders, completeness of data and context of the company's operations.

The result of the analysis carried out is reflected in the materiality matrix, which represents the issues found to be relevant in the economic, social and environmental spheres, both for Unidata and for its stakeholders.

The framework provided by this matrix is an important tool for Unidata to identify its sustainability priorities and define the actions to be taken in this area.

Priorities were identified by considering two dimensions:

- influence on stakeholders' decisions and assessments;
- significance of the economic, environmental and social impacts for the organisation.

The analysis of these two dimensions includes:

- Stakeholder perspective:
  - each stakeholder's perception of their dependence on the organisation and its impact on them;
  - stakeholders' expectations regarding the management of an issue and/or transparency regarding it.
- Point of view of the organisation:
  - significance of the impact;
  - likelihood of risks or opportunities related to the topic examined;
  - criticality of the issue for the long-term performance of the organisation;
  - opportunities for the organisation to gain benefits through the analysis of specific issues.

The themes analysed are:

Figure 4"The 19 themes analysed"

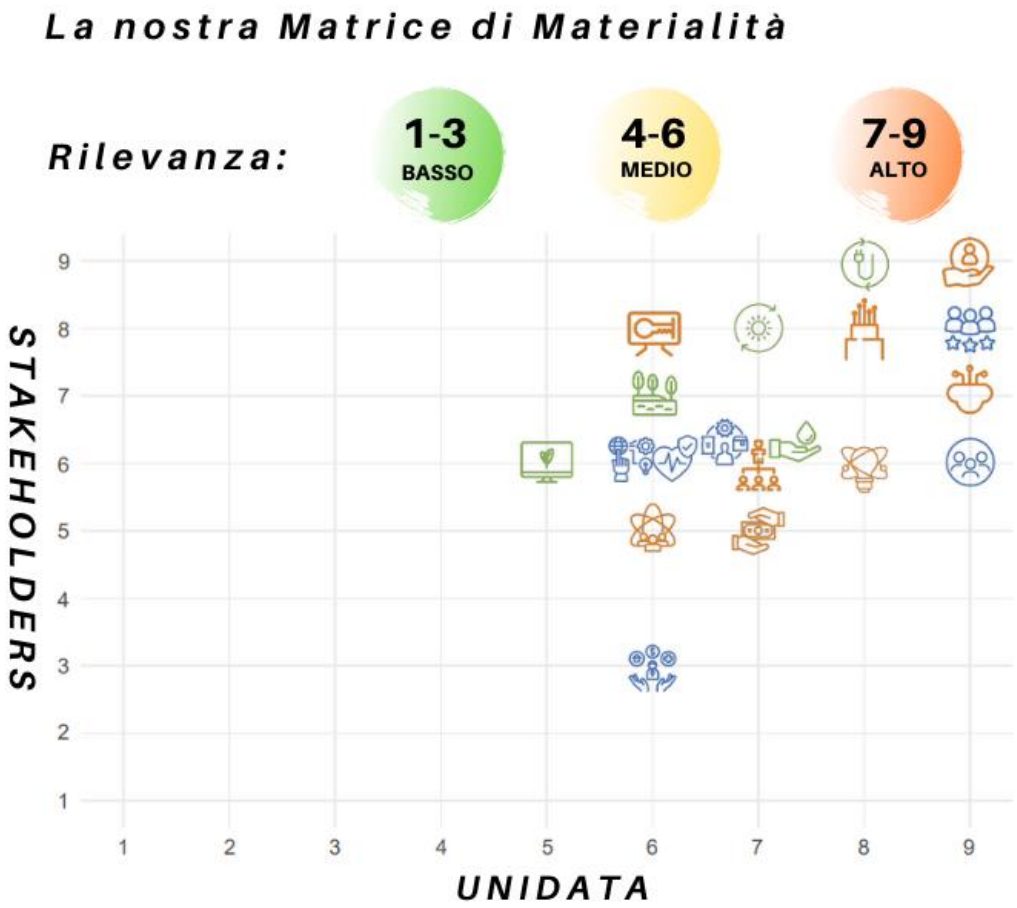

Figure 5"Unidata's Materiality Matrix"

The topics that were found to be of common interest among the interviewees are:

Implementazione della rete di fibra ottica

Figure 6"Relevant issues for Unidata and its stakeholders"

Sviluppo dei servizi Data center e Cloud

Centralità del cliente

Qualità della customer satisfaction

Efficienza energetica

Cambiamento climatico ed emissioni

Each individual issue will be dealt with in detail in the following sections of the document.

2 THE COMPANY AND GOVERNANCE

2.1 HISTORY

GRI 102-1 102-2 102-3 102-4 102-5 102-6 102-7 102-10

Unidata's history began in 1985 and is characterised by distinct phases.

In its first fourteen years of activity, the company mainly dealt with hardware and microelectronics, proposing the first personal computers and the first networks with intensive use of microprocessors in Italy.

The Nineties marked the beginning of the renewal process of Unidata's core business, making it one of the first Italian Internet Service Providers.

Following these developments and changes, "Cable&Wireless"—the UK's second-largest telecommunications and internet group—acquired 100% of the company.

The partnership with the multinational ended in 2002 when—with the end of the "internet bubble" and the downsizing of the "Cable&Wireless" activities—the same founding partners of the "first Unidata" bought back the company branch with the original name and brand.

The company resumed operations focusing mainly on the Internet, becoming Italy's first 100% VoIP telephone operator.

A wholly Italian-owned company, its five current partners include the three founders—Renato Brunetti, Marcello Vispi and Claudio Bianchi—who were joined in the early 2000s by two other partners and managers: Giampaolo Rossini and Roberto Venerucci.

From the beginning, the path taken has been one of innovation and attention to the most promising expressions of technological progress in telecommunications.

Among Unidata's main strengths is its in-depth knowledge of the ICT sector, with particular attention to business customers, and its flexibility in meeting specific needs, which have enabled the Company to increase its relationships with and trust in its customers year after year.

In recent years, Unidata has also dedicated itself to the residential sector, offering users from underserved areas (or areas not served at all), sources of ultra-wideband connection, guaranteeing up to 1.000 Megabits per second of connectivity speed.

The new service is made possible by the precious fiber-optic infrastructure and the FTTH infrastructure architecture, which stands for Fiber To The Home, indicating the presence of a line entirely in fiber-optic; from the power station to the end-user; without copper sections, thus guaranteeing maximum performance.

In May 2017, Unidata obtained ELITE certification, i.e., admission to the Borsa Italiana programme created to guide the best companies in the country in their growth projects.

The Programme—supported by Confindustria since its launch in 2012—helps companies through training and tutoring initiatives, accompanies them in the process of cultural and organisational change, which brings them closer to capital markets, places them in an international network, strengthens their ability to compete, improves their governance and their relations with qualified investors.

The continuous growth process was consolidated on 16 March 2020, when Unidata, despite the lockdown due to the SARS-CoV-2 emergency, successfully concluded the listing project on the AIM Italia market of Borsa Italiana.

Today, Unidata is a telecommunications operator with 2.985 km of a proprietary fiber-optic network in the Rome metropolitan area and Lazio region, offering its customers the most advanced connectivity, integrated communications, cloud computing, Internet of Things (IoT) and professional services. Unidata's current coverage is around 150.000 residential and business properties.

2.2 THE REFERENCE CONTEXT

GRI 308-1

The telecommunications sector is one of the leading digital transformation sectors and is known to be one of the most strategic for any advanced country. Moreover, there has always been an **important link** between the development of this type of technology and the level of development of a nation. Thus, when we talk about telecommunications, it is natural to refer to the **third industrial revolution,** which led to the birth of our society as we know it: fast, connected, digital. This is all the more true if we consider that most of the changes that have spread to other sectors started in the telecommunications sector, or at least it was one of the sectors that functioned as a sort of 'laboratory' for experimenting with innovations that were then applied in other areas.

Among the technologies that have contributed the most in overcoming the lockdown period and influencing work processes, telecommunications have certainly played a decisive role.

Today, but increasingly in the future, businesses will depend on the efficient flow of information and communication within and outside organisations, with an increasingly close relationship between equipment, lines and services.

Chat, email, telephony, videoconferencing, management, CRM, applications, data sharing, cloud servers are all key services for the efficiency of any business organisation. The telecommunications infrastructure needs to be optimised, selecting operators, equipment and services that improve the flow of information and maximise work productivity.

For this reason, it is increasingly essential to rely on experienced and competent specialists who can analyse the state of the company's telecommunications and propose solutions to ensure maximum efficiency, reduce waste and protect against attacks on information systems.

As we have seen, Unidata has been on the market since 1985, initially specialising in hardware with the construction and distribution of the first microcomputers, PCs and servers; later, it gradually shifted its focus to internet services, which it has been providing since 1994.

The activity of *Internet Service Provider* is the company's core business, extending and specialising its field of action to telecommunications services and infrastructures.

The company detains a fiber-optic network of its own construction and ownership and the *data centre* necessary for the provision of hosting and cloud computing services, strategically linked to the provision of access and fiber-optic network services.

Unidata is an authorised operator of:

- Public network services;
- Public voice telephony services throughout the country;
- Public Wireless Wi-Fi and licensed band (26 GHz) services throughout the Lazio region.

Since 2017, Unidata has been developing network technologies, infrastructures and services, in an area of great interest and potential, that of the Internet of Things (IoT), as an operator of LPWA (Low Power Wide Area) wireless services.

The specialised services offered by Unidata are divided into:

- Fibre Optics and Connectivity
- Cloud and Data Centres
- Fixed Telephony
- Internet of Things (IoT)
- Services and ancillary products

Unidata operates as an Internet Service Provider in the communications sector. In particular, its activities are organised into two product areas: Fibre & Networking and Cloud & Data Center, which are complemented by IoT and Smart Solutions.

Unidata offers its services and products mainly to:

- business customers
- Public Administration
- operators (wholesales)
- private residential customers

Both nationally and globally, the telecommunications sector has a strong strategic value due to its link with innovation and investment. Moreover, it is characterised by a highly competitive market with decreasing prices.

Unidata recognises the importance of identifying and assessing all positive and potential negative impacts that its activities, products and services may have on the environment.

Conscious of operating in the process of continuous improvement, through initiatives and projects aimed at minimising the environmental impact of the company's activities—of the customers themselves and the stakeholders in general—Unidata sets itself the following objectives:

- ensure full compliance with applicable environmental laws and regulations, including, where possible and feasible, trying to exceed legal requirements;

- adopt appropriate management systems and procedures that favour the development and implementation of appropriate and well-structured plans and programmes for the protection of the environment; in particular, within the scope of its operations, logistics and management of infrastructures and company offices, paying particular attention to technological systems, their design, operation, maintenance, ensuring maximum efficiency in the use of natural resources and energy and minimising possible negative impacts on the environment;
- to contribute to the extent of its competence to the fight against climate change, thus helping to achieve the objectives defined at national and international level;
- select their suppliers and partners, and the products and services they purchase or outsource, including based on environmental sustainability criteria; evaluate products and services taking into account their entire life cycle, periodically checking their compliance with the above criteria.
- identify and assess the environmental risks present in general at the various levels of its supply chain and, in close collaboration with its direct suppliers and also through partnerships at the national and international level, adopt appropriate corrective actions and improvement plans to reduce the environmental impact of the products and services purchased and the processes through which they are manufactured;
- investing in research and development of advanced services, solutions and products that are both economically and ecologically sustainable;
- to consider environmental sustainability aspects in new infrastructure and service development projects;
- communicate transparently and systematically to its *stakeholders* material information about its environmental performance verified by external and independent parties;
- communicate and illustrate to its employees through specific training programmes and communication initiatives the social and economic value of environmental sustainability and the initiatives and actions undertaken to put its principles into practice and make them an integral part of its activities.

2.3 CORPORATE GOVERNANCE

GRI 102-5 102-7 102-18 102-22 102-23 405-1

Corporate governance is the set of subjects, rules, laws, and procedures determining and controlling corporate management. This subjective, normative and factual framework of corporate governance covers the internal rules of a company—such as the articles of association—and the requirements concerning the company's external relations with the capital market. It is therefore defined both by management and by the legislator.

Corporate governance is a key element in building confidence in capital markets. Adherence to good corporate governance principles and practices contributes to healthy markets by strengthening trust between issuers and investors.

The system adopted by Unidata aims to guarantee transparent and responsible management of the activity towards third parties, employees, collaborators, shareholders and the market in general to pursue the company's aims.

2.3.1 The Shareholders' Meeting

18 February 2020 was an important date for Unidata. The shareholders' meeting approved a capital increase of 700,000 ordinary shares, aimed at listing the company on the Alternative Investment Market managed by Borsa Italiana, i.e., the FTSE- AIM segment.

On 16 March 2020, Unidata was officially admitted to trading on the Italian Stock Exchange: 439.100 shares with a unit value of €13,00 were subscribed for a total value of € 5.708.300.

As of the listing on the AIM market, the corporate structure is composed as shown below.

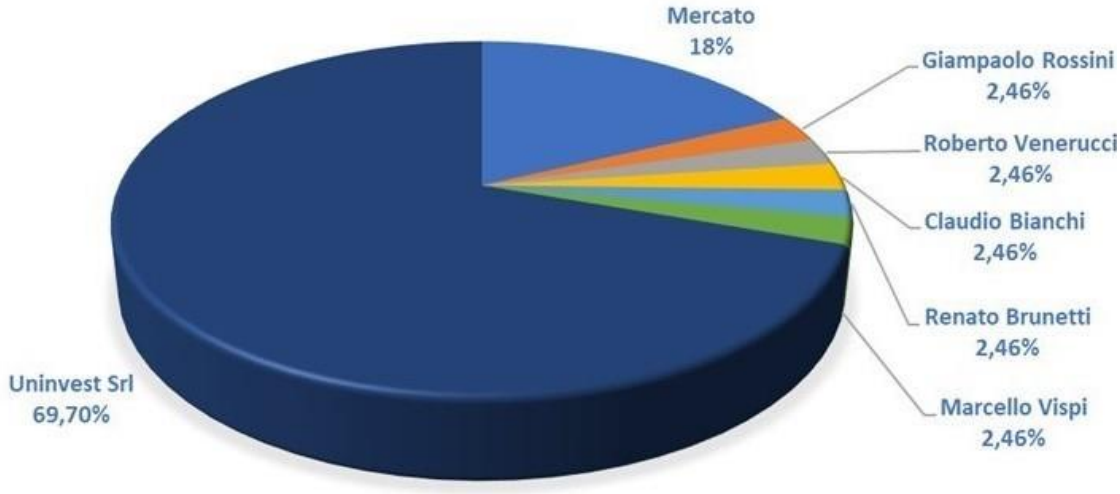

Figure 7" Unidata's shareholder structure"

2.3.2 The Board of Directors

Figure 8"The Unidata Board of Directors"

Renato Brunetti	Claudio Bianchi	Marcello Vispi	Giampaolo Rossini	Roberto Venerucci	Stefano Ciurli	Alessandra Bucci
President	Vice-President	Vice-President	Councilor	Councilor	Councilor	Independent Director

The Board of Directors (BoD) is vested with the powers for the ordinary and extraordinary administration of the Company, with the power to carry out all appropriate acts for the achievement of the corporate purposes, with the exclusion of acts reserved—by law or by the Articles of Association—to the Shareholders' Meeting.

2.3.3 The Board of Auditors

The Board of Statutory Auditors is vested with the powers provided for by law and the Articles of Association during the 2018 financial year. The Board, also acting as the Internal Control and Audit Committee, supervised the financial reporting process, the effectiveness of the Internal Control and Risk Management System, the statutory audit of the annual and consolidated accounts, and the statutory auditor's independence.

The Board also supervised compliance with the provisions of Legislative Decree 254/2016 on non-financial reporting, reporting on it in the annual report to the Shareholders' Meeting.

Figure 9" The Board of Statutory Auditors of Unidata"

Pierluigi Scibetta	Antonia Coppola	Stefano Grossi	Antonella Cipriano	Luigi Rizzi
President	Acting auditor	Acting auditor	Alternate auditor	Alternate auditor

2.3.4 Management

Corporate management is the combination of all administrative, management and leadership functions of an organisation. Top managers' task is to manage activities effectively to ensure that the company achieves its objectives in line with the Mission.

"Unidata's mission is to exploit the potential offered by the most modern expressions of technological, IT and telecommunications progress to contribute in making customers' daily lives better and their work more efficient and productive."

Figure 10"Unidata's Management"

Renato Brunetti	Claudio Bianchi	Marcello Vispi	Giampaolo Rossini	Roberto Venerucci	Roberto Giacometti
Chairman and Chief Executive Officer	Data Centre Manager and Vice President	Vice-President	Technical Director and Director	Commercial Director and Director	CFO and Investor Relator

2.4 INTERNAL CONTROL AND RISK MANAGEMENT SYSTEM

GRI 102-11 102-15 102-25 102-29

Unidata's Internal Control and Risk Management System is the set of tools, organisational structures, standards and corporate rules aimed at allowing the company to be run in a healthy, correct and consistent manner with the corporate objectives defined by the Board of Directors.

Control is achieved through an adequate process of identification, measurement, management and monitoring of the main risks, as well as through the structuring of adequate information flows to ensure the circulation of information.

One of the tools used to prevent corporate risks is adopting the Organisation, Management and Control Model according to Legislative Decree 231/01.

The so-called '*Model 231*' was introduced in Italian law by Legislative Decree No. 231 of 2001. It prevents the administrative liability of companies for certain offences committed materially by directors, representatives or employees in the interest and to the advantage of the company itself.

Adopting an adequate Organisational, Management and Control Model prevents the Company from being held liable for the offences described above, provided that a Body is set up to oversee the operation of and compliance with the provisions of the Organisation Model. The Body is also in charge of verifying the actual effectiveness of the Model and assessing the need for any updates also concerning the "risk areas."

In compliance with the indications of the aforementioned Decree, Unidata has adopted its own Organisation, Management and Control Model, a Code of Ethics—as a charter of ethical and social values for all those who participate in the company—and has entrusted a Supervisory Board, with autonomous powers of initiative and control, with the task of supervising the operation of and compliance with the Model and of keeping it updated.

The Model adopted by Unidata is consistent in its contents with the provisions of the Decree and is part of the Company's broader policy aimed at raising the awareness of both internal staff and external collaborators and business partners of the need for transparent management that respects the regulations in force and the fundamental principles of ethics in the pursuit of the corporate purpose. The Model comprises a "General Section" and individual "Special Sections" prepared for the different types of Crimes and Offences to be prevented.

Based on the checks carried out, the Control and Supervisory Board pointed out to the Company the opportunity to proceed with the relevant adjustments and updates of the Organisational Model

due to regulatory and/or organisational changes and the existence of new areas of activity at risk. This was done to raise the level of usability of the Organisational Model, further respecting the requirement of "adequacy" required by the legislator to benefit all those who, with different roles, are involved in the Model.

This update of the Model has become necessary due to:

1. the inclusion of the new predicate offences in the risk mapping (set out below), which leads to the adoption of rules and measures to prevent the occurrence of the offences in question:
    - **Tax offences** (Art. 25-quinquiesdecies D. Lgs.231/2001 - Article added by Law Decree no. 124 of 26 October 2019 coordinated with Conversion Law no. 157 of 19 December 2019 and amended by Law Decree no. 75 of 14 July 2020):
    - **Fraud in public supplies** (Art. 24 D. Lgs.231/2001- Offence added by D.Lgs.n.75 of 14 July 2020).
    - **Embezzlement** (Art. 25 D. Lgs.231/2001- Offence added by D.Lgs.n.75 of 14 July 2020).
    - **Embezzlement by profiting from the error of others** (Art. 25 D. Lgs.231/2001- Offence added by D.Lgs.n.75 of 14 July 2020).
    - **Abuse of office** (Art. 25 D. Lgs.231/2001- Offence added by D.Lgs.n.75 of 14 July 2020).
    - **Violation of the rules on the Perimeter of National Cyber Security** (Art. 24 bis D. Lgs.231/2001- Offence added by Decree-Law No. 105 of 21 September 2019).
    - **Smuggling - Border rights** (Art. 25-sexiesdecies D. Lgs.231/2001 - Article added by D.Lgs n.75 of 14 July 2020)
    - **Fraud in sporting competitions** (Art. 25-quaterdecies D. Lgs.231/2001- Article added by Law No. 39 of 3 May 2019).
2. the need to adopt rules and controls suitable for preventing the occurrence of the crimes covered by Article 25 sexies of Legislative Decree 231/2001 "**Market abuse**," following the listing of Unidata S.p.A. on AIM Italy.
3. the need to draw up a new protocol relating to the company area that manages relations with the **subsidiary** to establish rules and controls suitable for preventing the offences referred to in Legislative Decree no. 231/2001.

2.4.1 Risk management

According to Article 2428 of the Italian Civil Code, the main risks to which Unidata is exposed are listed below, together with the actions taken to address them.

1. *Risk related to telecommunications market trends*

The telecommunications market is competitive in terms of innovation, prices and efficiency; ICT technologies can be the basis for recovering productivity, improving international competition and creating new skilled jobs.

Unidata, therefore, finds itself competing with larger companies and industrial groups and specialised operators with specific resources that allow it to be better positioned in the reference market.

The high level of customer loyalty in the geographical area of activity and the high quality of the services offered contribute to the success of the Company's activities, enabling it to maintain and increase its market share by offering innovative services capable of guaranteeing adequate levels of profitability.

2. *Risks related to contracts with the leading national wholesale operator*

During 2018 and 2019, the Company signed two contracts with a leading national wholesale operator, with a duration of 6 and 5 years respectively, concerning the granting of exclusive rights of use and enjoyment relating to the Company's existing fiber-optic cables to be laid in line with the timelines described in the contracts.

The Contracts are particularly important for the Company as they will allow a significant expansion of the network owned by the Company, increasing, in the medium-long term, the number of users that can be reached and generating significant positive effects in terms of revenues.

3. *Sector risk*

Changes in legislation and regulations in the Italian telecommunications sector, both at a national and an EU level, could negatively affect the economic results of companies in the sector by introducing new charges or increasing existing ones; possible sanctions by AGCOM could negatively affect the company's business and its economic, equity and financial situation.

Changes in the regulatory framework could make it difficult for the company to obtain services from other operators at competitive prices or restrict access to services necessary for the conduct of its business.

The company pays constant attention to the evolution and changes in the sector's regulatory framework through monitoring and constructive dialogue with the institutions, working to minimise any resulting economic impact.

4. *Risks related to the technological dependence of the telecommunications sector*

The complex market in which the company operates is characterised by a high risk of Information Technology (IT) and Information and Communication Technology (ICT) systems. These require investing adequate resources in the prevention of risks related to damage and malfunctioning of these systems.

The company's ability to adapt its infrastructure in relation to technological developments has allowed it to be constantly evolving and in line with its main competitors. In recent years, the company has invested in the reliability of its core business systems. Highly reliable are the data

centres in Rome, equipped with the main security, fire prevention and anti-flooding systems; the service staff makes backup copies of the data, guaranteeing the level of reliability.

Even though Unidata's network is made up of the most modern technologies available, it is not possible to exclude that the advent of alternative technologies to those covered by the services offered could lead to a decrease in revenues deriving from a contraction of the market share held in the business areas affected by such technologies and require the Company to incur unforeseen costs to adapt to its competitors.

In this regard, it should be noted that the Company has participated and continues to participate in research and development projects on software and equipment, benefiting from contributions from national and European public bodies.

5. *Risks associated with the operation of the fiber-optic network and IT systems*

Unidata's activities are carried out through the use of its own network infrastructure and data centre, containing proprietary and non-proprietary technological infrastructures, such as software platforms and databases.

The company is therefore exposed to the risk that the continuity and quality of the services it offers are threatened:

- with respect to the network infrastructure (i) by damage to the optical fibers comprising the network infrastructure caused, for example, by particularly challenging weather conditions, theft or unintentional damage by third parties; and (ii) by failure of the Point of Presence to function and be supplied;
- with reference to the software and components used, by bugs, defects, computer viruses or hacker attacks (e.g., double denial-of-service attacks, which cause an overload of computer services by sending a very large amount of data at the same time);
- with reference to data centres, by multiple operational risks due to server failures, work or connectivity interruptions, programming errors, power system instabilities, security system breaches, third party misconduct and/or events of an exceptional nature.

Even though Unidata guarantees the operability of its network and IT systems, among others:

a) providing internet access to its customers through pairs of optical fibers placed on different routes and connected to separate equipment, capable of rerouting traffic with a service interruption of no more than 50 milliseconds;
b) adopting appropriate information security management measures and systems, such as an ad hoc corporate function exclusively dedicated to monitoring pathological phenomena that may affect software;
c) equipping its data centres with all the main facilities needed to ensure near-constant operation of the structure

In the event that the aforementioned circumstances or other circumstances that could affect the correct operation of the systems would force the Issuer to suspend or interrupt the provision of its services, the Issuer could experience a decrease, even significant, in revenues with negative effects

on its financial, economic and asset situation.

Following the national SARS-CoV-2 emergency, the company, as a telecommunications operator, took action by setting up a *Crisis Committee*, consisting of the President, his Vice-Presidents, and the three Functional Directors, to ensure continuity of services.

6. *Risks associated with the use of other operators' infrastructure and services*

Unidata carries out the activity of setting up internet and telecommunications networks also with the help of third-party operators, using, for example, infrastructures such as pipelines, and optical fibers and wireless towers of other operators.

Therefore, if for any reason these contractual relationships should cease to exist or their terms and conditions should change to the detriment of Unidata, the Company may not be able to sign the agreements necessary to continue its activities in the short term or to obtain negotiating conditions comparable to those in force, with consequent negative repercussions on its economic, equity and financial situation. The agreements in place could also lead to litigation, resulting in unexpected costs for the Company and possibly damaging its reputation.

Moreover, to connect its end customers to its own fiber-optic network, the Company accesses, through co-location contracts with economic and technical conditions generally regulated by AGCOM, specific technologically equipped premises—the so-called "Other Licensed Operators" "OLO" Rooms—at the plants of third party operators (in most cases Telecom Italia S.p.A.), where it positions the equipment necessary to allow such connection (the so-called Optical Line Terminals or "OLT").

7. *Credit risks*

The amount of receivables relates to commercial transactions with customers, and also, in this case, the risk is considered limited because of the activities carried out by the company aimed at identifying possible impairment losses related to the occurrence of events that may prove the existence of financial difficulties of the debtor.

Unidata's business mainly consists of providing services to business customers, including the public administration and small and medium-sized enterprises, and to retail or residential customers. The company also sells wholesale to other ISPs, both ready-made connections and rights to use (in IRU mode) for its proprietary optical cables.

Unidata has adopted internal risk prevention and trade receivables management processes that are distinct for each type of customer (retail, business and wholesale), generally characterised by the performance of activities to assess the spending capacity and financial soundness of its counterparties and by a predetermined credit recovery process that involves, where possible, the suspension of service provision after the first payment reminder.

8. *Liquidity risk*

The liquidity risk is understood as the potential difficulty in meeting financial liabilities related to delays in collections from customers. It is absorbed by a liquidity reserve created by the company with the stock of liquidity at the bank Intesa SanPaolo Spa.

9. *Risk related to exchange rate and interest rate fluctuations*

Unidata operates mainly in Italy; therefore, the risk of exchange rate fluctuations to which the company is exposed is minimal. The risks connected with fluctuations in interest rates mainly relate to the risk of changes in interest rates on medium/long-term loans taken out during the year.

The financial risk deriving from the fluctuation of interest rates on bank credit lines is not considered significant due to the active management of all bank relationships with financial institutions. Short-term bank credit lines for current management activities are regulated at contractually defined market conditions and rates.

10. *Delegation risk*

Unidata has adopted an Organisation, Management and Control Model under Legislative Decree no. 231 of 8 June 2001, which introduced a system of administrative liability for companies concerning certain types of offences committed in the interest or to the company's advantage itself.

The model's adoption represents a means of prevention against the risks of crimes and administrative offences provided for by the reference legislation.

11. *Risks related to the management control system*

Unidata's management control system is characterised by data collection and processing that are not fully automated.

To adapt the management control system to the Company's development, Unidata has already drawn up several measures to achieve greater integration and automation of reporting, thereby reducing the risk of error and increasing the timeliness of the flow of information. Management expects to complete the implementation by the end of 2021,

If the process of updating the control and management system is not completed, the Company could be exposed to the risk of inefficient management of its activities, of underestimating the extent of any critical issues or perceiving their true extent only belatedly, with detrimental consequences on its economic, equity and financial situation.

2.4.2 Supervisory body

The Supervisory Board was renewed by the Board of Directors at its meeting on 30 May 2019 and will cease to hold office with the approval of the 2020 financial statements. It is currently composed of:

- Michele Ciuffi - (Chairman of the Supervisory Board since 2009)
- Maria Teresa Colacino - (External member of the Supervisory Board since 2018)

As part of its activities, the Supervisory Board in the year 2020 in particular:

1. collected **information flows** relating to sensitive corporate processes and activities, also carrying out sample checks on corporate data and documents; the outcome of the analysis of the information, made available within the prescribed time limits, is summarised in the quarterly reports drawn up and in the flow sheets received;
2. monitored the processes at risk of offence through the information received from each department manager, summarising the outcome of the analysis of this information in the **quarterly SB** reports to the Administrative Body;
3. supervised the operation of and compliance with the Organisation, Management and Control Model, promoting the **updating** of the Model;
4. found that there were **no reports** of the commission or attempted commission of any of the offences covered by Legislative Decree no. 231 of 8 June 2001, or of fraudulent breach or evasion of the Organisational Model of Unidata Spa, or of circumstantial reports of unlawful conduct that does not comply with the provisions of the Code of Ethics and Organisational Model 231 of 'Unidata Spa. In fact, no report has been made to the specially established e-mail addresses odv231@unidata.it and odv.segnalazioni@unidata.it, the latter having been set up for the submission of reports under Article 2 of Law 179/2017 (laying down "Provisions for the protection of the authors of reports of offences or irregularitiès of which they have become aware in the context of a public or private employment relationship" - Whistleblowing). No paper report has been received through the postal service, another reporting channel established by the Company Whistleblowing Policy.

2.5 CODE OF ETHICS

GRI 102-16

Unidata is sensitive to the principles of corporate social responsibility and has always been committed to ensuring conditions of fairness and transparency in the conduct of business activities to protect its position and image, the expectations of its shareholders, and its employees' work.

The basic principle is that efficiency and cost-effectiveness must be inextricably linked not only to ethical sensitivity but also to social involvement and respect for the environment.

This sensitivity is reflected in the ability to combine and integrate different objectives in achieving the company's mission, such as:

- attention to the needs of the community and respect for the environment;
- the promotion of a working environment inspired by respect, fairness, cooperation, and professional skills enhancement.

The importance of developing a business characterised by strong ethical values, justice and respect for human rights is confirmed by Unidata's adoption of a Code of Ethics, a fundamental component of the company's Internal Control System and a tool othe corporate culture.

The Code of Ethics defines the company's essential values, reference standards and rules of conduct. It sets out the binding principles—without exception—for all company representatives, employees and any other person acting, directly or indirectly, in the name and on behalf of the Company.

It plays a fundamental role in Unidata's credibility within the civil and economic context, translating the appreciation of the values that characterize how the company operates into a competitive advantage.

Unidata requires all those who collaborate with it to observe and disseminate the code as widely as possible. Furthermore, it continuously monitors its compatibility with the evolution of the regulatory framework.

2.6 ECONOMIC PERFORMANCE AND VALUE DISTRIBUTION

GRI 102-29 201-1

In the 2020 financial year, Unidata reported a value of production of € 23.436.555 and a net profit for the year of € 3.392006.

The company, therefore, achieved an overall increase of 77,44% in the value of production, which in 2019 amounted to € 13.208.112, while profit increased by approximately 142,33% as in the previous year it amounted to € 1.399.813.

An analysis of the general economic performance for the year shows that the gross operating margin (*EBITDA)* of € 8.624.356 recorded a positive change of € 3.470.771 (+67%) compared to the 2019 financial year.

A positive impact on Unidata's capitalisation is the revaluation of its fiber-optic infrastructure.

This was done by valuing the infrastructure for the purely proprietary part active on 1 January 2019, the date of First Time Adoption of the international accounting standards. The scope of the valuation concerns the network's own equipment, i.e., the backbone network, the secondary network, the verticals and the Points of Presence (PoP) were analysed.

Based on the analysis made, the economic value of the fiber-optic network was conservatively estimated on 1 January 2019 to be no less than € 12.747.546,65 based on the income method estimated on the market prices of active users.

Below are Unidata's key economic figures:

Table 1"Value added income statement"

	2020	%	YoY	2019	%
Value of production	23.436.555	100	77,44%	13.208.112	100
Production costs	(11.902.804)	(50,78)	100,44%	(5.938.351)	(44,96)
Added value	**11.533.751**	**49,21**	**58,65%**	**7.269.761**	**55,04**
Labour costs	(2.909.395)	(12,41)	37,48%	(2.116.176)	(16,02)
Gross Operating Margin - Ebitda	**8.624.356**	**36,80**	**67,35%**	**5.153.585**	**39,02**
Depreciation and provisions	(3.731.401)	(15,92)	21,67%	(3.066.863)	(23,22)
Operating Income - Ebit	**4.892.955**	**20,88**	**134,48%**	**2.086.722**	**15,80**
Balance Financial management	(108.615)	(0,46)	10,90%	(121.898)	(0,92)
Economic result before tax	**4.784.340**	**20,41**	**143,50%**	**1.964.824**	**14,88**
Income tax	(1.392.234)	(5,94)	146,41%	(565.011)	(4,28)
Net result	**3.392.106**	**14,47**	**142,33%**	**1.399.813**	**10,60**

By separating the activity by business lines, it is possible to analyse the contribution of each individual area to the company's overall revenues.

Fibre & Networking

This revenue line includes revenues from Internet access services in optical fiber, XDSL and wireless, voice telephony and wholesale services. Its value in 2020 is € 17.919.573.

- Revenues from connectivity increased compared to the previous year, attributable to fiber optic connectivity services, which increased by 14,90%.
- Revenue from the construction of telecommunications infrastructure shows an increase of 15,03%, attributable to the increase in works related to the RM Fiber project.
- Revenues from FWA and DSL access deviated from the previous year's figures, increasing by 10,46%.
- Revenues from telephone consumption increased by 15,58%.

Cloud & Datacenter

Revenues for this business area, which amounted to € 1.087.725, decreased by 12,12% compared to the previous year.

Revenues IoT & Smart Solutions In the 2020 financial year, this revenue line amounts to € 227.540.

Investments in infrastructure implementation during 2020 amount to € 10.645.965.

It is considered appropriate to specify that intangible assets such as concessions for the right to use optical fiber consist of items that, by their nature, are indispensable and strategic for the realisation of the company's business model and for the provision of telecommunications services.

Below is the share's performance from listing until March 2021.

In addition to the capital increase for the issuance of new ordinary shares, the Shareholders' Meeting resolved on a further increase for the issuance of an equal number of Warrants offered to investors who subscribed to the purchase offer during the IPO phase; the purchase option linked to the Warrants will be exercisable in three tranches and will end on 17 November 2022; holders will be able to subscribe for one ordinary share for every four warrants held for a maximum of a further 175.000 shares.

41.000 warrants were exercised with the subscription of 10.250 new ordinary shares (at a ratio of one ordinary share for every four warrants held) at a price of € 16,90 per share, for a total value of € 173.225.

Figure 11"Unidata share performance"

Figure 12"Unidata quotation performance"

On the left, the market performance of the warrants until February 2021 is displayed.

The Shareholders' Meeting is competent to take ordinary and extraordinary decisions on matters reserved to it by law or by the Articles of Association.

The meeting is chaired by the Chairman of the Board of Directors, and its resolutions, taken following the law and the Articles of Association, are binding on all shareholders.

Figure 13"Warrant Unidata trend"

2.7 IMPLEMENTATION OF THE FIBRE OPTIC NETWORK

GRI 102-29 203-1

Italy is a fascinating and, at the same time, complex country, characterized by a unique cultural heritage and a very strong human potential, great minds striving to put their skills into action.

Unidata has decided to contribute to this process by building a gateway to all the growth opportunities offered through the web by harnessing the skills and brains that would otherwise have flown elsewhere.

The result is the implementation of the so-called MAN network—an acronym for Metropolitan Area Network—which represents for Unidata the result of years of work and investment and has led to the installation of more than 2.900 km of optical cables.

Unidata's wholly-owned fiber-optic network is one of its main strengths, enabling it to guarantee a particularly reliable service; part of the 2

900 km is also granted to other operators through IRU contracts. Specifically, on 31.12.2020, Unidata granted 1.050 km of network to IRUs, while retaining the remaining 1.935 km for its exclusive use.

The IRU (Indefeasible Right of Use) is a contractual form that allows the acquisition of the exclusive, unrestricted and non-revocable use of a part of a telecommunications system, which for contracts concluded by Unidata, has a duration of 15 years.

Composed and integrated with different technologies, infrastructure architectures and licences, the network offers state-of-the-art services including:

- ultra-wideband connectivity thanks to 100% fiber-optic cables,

- VoIP telephony,
- Dedicated VLANs,
- wireless connections.

By overcoming the old access networks with copper pairs and choosing the ultra-wide band of NGN networks, the company can offer all users reached by the proprietary network the maximum performance envisaged by the FTTH (Fiber to the Home) architecture which also represents the most durable form of investment.

Over time, Unidata has built and commissioned several Pop (Points of Presence), i.e., sites where its own telecommunications equipment is installed. Using GPON (Gigabit-capable Passive Optical Network) technology, these devices are able to provide FTTH services to the majority of the SME and residential markets.

Unidata opted to construct a fully FTTH (**Fibre to the Home**) network because it is currently the highest **performing** and most **reliable** technology for connecting to the Internet, with speeds of up to **1 Gbps** and minimal latencies. This performance can only be achieved by building the entire connection—from the transmission centre to the private Internet router—using fiber-optics.

FTTH technology was favoured over FTTC **(Fibre to the Cabinet**) because the latter involves the connection of fiber-optics exclusively from the transmission centre to the street cabinets, while the cable that transmits the signal inside the flats is still in copper.

The FTTC architecture has lower performance than FTTH, reaching 100/200 Mbps. In any case, performance is higher than that provided by ADSL, which, running solely on copper cables, can reach a maximum of **20 Mbps** in download in optimal conditions.

Wireless Internet access is used both as an alternative to low-speed wired connections, both as fast access and as an alternative to other forms of wireless connection.

The absence of a broadband infrastructure puts areas that do not have such a resource at a strong disadvantage compared to all areas reached by these services, to the detriment of businesses and industries' potential for economic growth. Over the decades, the company has gained in-depth experience in the planning, installing, and maintaining infrastructures for covering areas with Wi-Fi connections. In addition, Unidata has chosen Ruckus Wireless, one of the world's most advanced companies in the production of technologies for wireless coverage, for the usage of its wireless equipment and services.

In 2017, Unidata obtained from Mi.S.E. the radio frequencies for the 26 GHz band for the Lazio region, which allows it to offer additional ultra-broadband services and to reach new areas, especially industrial areas, which were before unserved and peripheral areas with disadvantaged infrastructures.

Ultra broadband (banda ultra-larga, BUL) grants the ability to networks to send data at very high speeds, equivalent to at least 100 Mbps (defined as "ultra fast broadband" in the Digital Agenda for Europe) or at least 30 Mbps ("fast broadband"). Italy is pursuing a strategic plan for ultra-broadband, launched in March 2015.

Fixed and mobile ultra-wideband, i.e., FTTH, FWA and 5G, are undoubtedly the lines of development of a network that can reasonably be considered capable of covering the needs of the next twenty years.

The Strategic Plan for Ultralarge Bandwidth has been officially in full swing for the past three years. However, as can be seen from Infratel data, it is now highly unlikely that the remaining 75% of the overall infrastructure will be in place by the end of 2023, based on the current regulatory, authorization and operational framework.

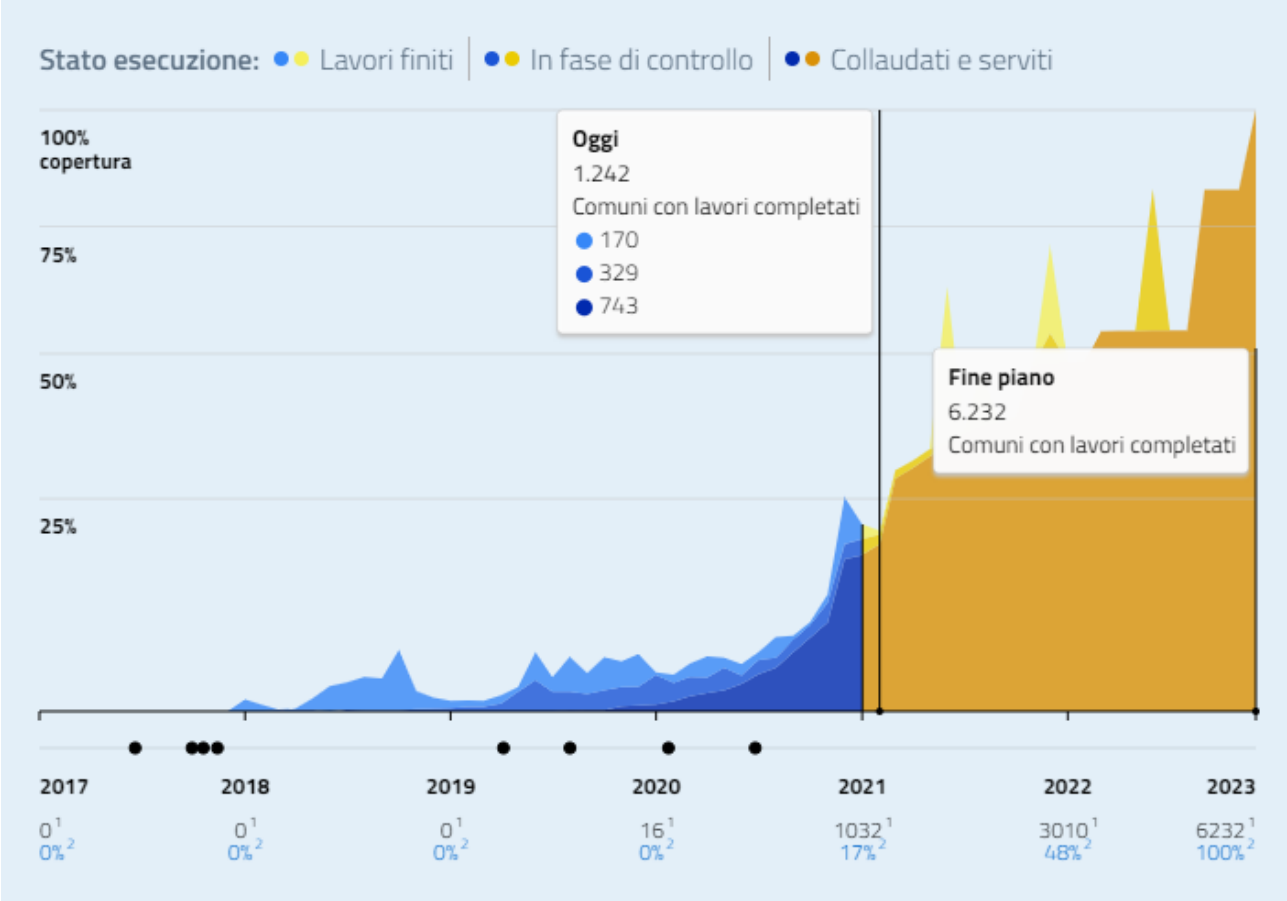

Figure 14'Evolution of fiber network coverage'

An extensive BUL infrastructure is certainly one of the enablers of the ecological transition. Let's think about smart metering, which can make water, electricity and gas consumption more efficient in connection with building automation. We should also remember that the transition to so-called 'smart' production processes enables not only a clear recovery in productivity but also a reduction in wasted materials, energy costs, water consumption and harmful emissions.

With infrastructure and data available, the fundamental issue of using them in an open format comes into play. These are digital environmental initiatives aimed at strengthening digital environmental information systems in light of the European Green Deal and exploiting the benefits of open science, citizen science, and other similar initiatives for environmental monitoring and protection.

Currently, the coverage of the fiber-optic network owned exclusively by Unidata is as follows:

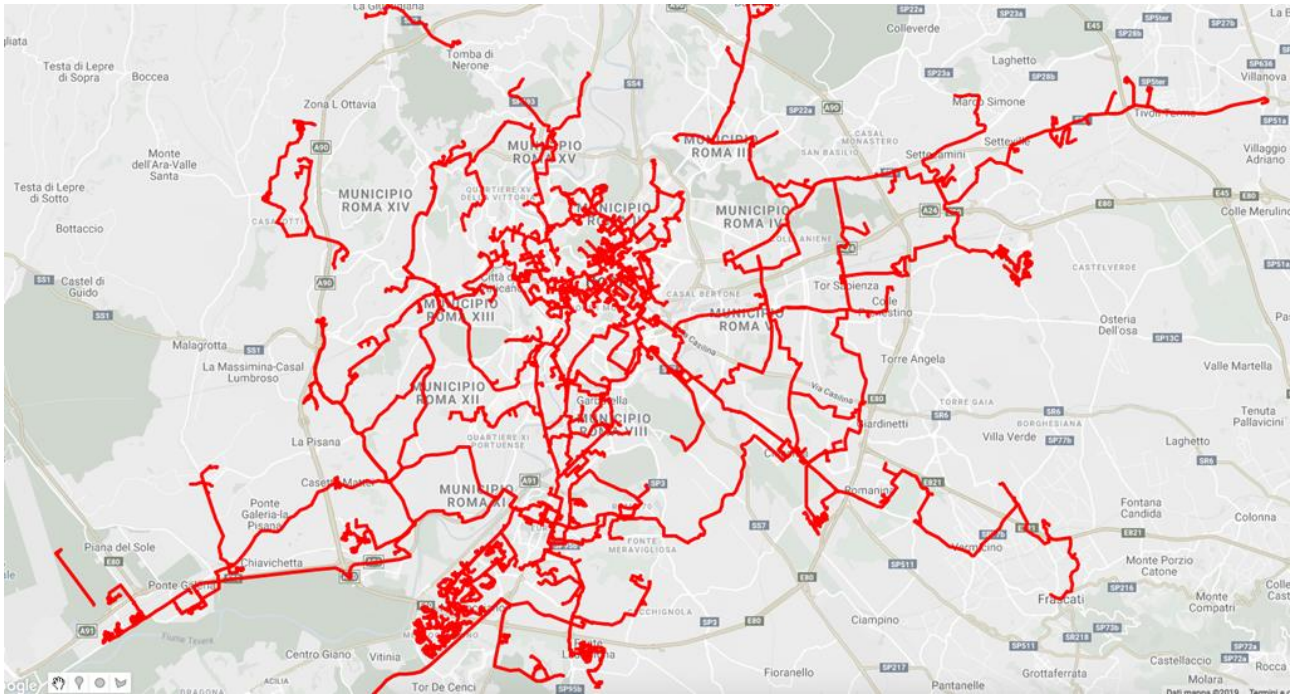

Figure 15" Unidata fiber-optic coverage over the city of Rome"

In terms of implementing the fiber-optic network, Unidata's challenge is to provide coverage to 158.000 households in the Metropolitan City of Rome over the three years, 2021-2023.

Specifically, the objective is to build new PoPs (Points of Presence) at strategic points to guarantee service coverage for the entire catchment area.

Below are the areas of greatest interest with an indication of the estimated catchment area and the number of housing units expected to be reached over the three-year period.

	Target 2021	Three-year target (2021-2023)
PoP Parioli	12.000 units	45.000 units
PoP Flaminio/Venezia	-	35.000 units from 2022
PoP Praetorian	5.000 units	40.000 units
PoP Malatesta	-	36.000 units from 2022

Table 2"PoP creation objectives"

Unidata also plans to implement the capacity of its existing PoPs as follows.

	Target 2021
PoP Balduina/Primavalle	+ 27.000
PoP Garbatella	+ 5.000
PoP Torrino	+ 1.000

Table 3"PoP Implementation Objectives"

These specifications refer to the implementation of the network for the exclusive use of Unidata; in addition, it is planned to reach a further 59.000 households in 2021 by means of fiber-optic cables granted for use to external operators through IRU-type contracts.

The new direction taken by Unidata, the result of its focus on innovation and the future of telecommunications, is now aimed at the so-called fourth industrial revolution and solutions for Industry 4.0, of which the Internet of Things (IoT) is the main driver. This focus has already translated into the study of LoRa™ wireless transmission technology and the related LoRaWAN™ network standard, which has led the Roman company to create radio coverage over the entire city of Rome and to present this result at the great international innovation fair, Maker Faire - The European Edition, of which Unidata has been a Gold Partner since the first edition.

2.7.1 The SARS-CoV-2 emergency and telecommunications

The lockdown period inevitably had a **disruptive impact on Italy's telecommunications networks**, with the exponential increase in traffic caused by **data-intensive services** (video game platforms, streaming portals, distance learning, video calls), which put a strain on a system that fortunately held up.

AGCOM data show an increase in **fixed network** data flow almost doubled compared to 2019 in March (+90%) and April (+80%), and YoY growth of more than 30% throughout 2020.

The communications sector has played a central role in managing the crisis, proving to be one of the cornerstones of our country's economic and social system, and in particular, new generation networks represent the **extra weapon to overcome the economic effects of the pandemic crisis** in the near future.

Unidata, as a telecommunications operator, ensured continuity of service during the lockdown period in the management of an infrastructure, which is one of the most strategic for our country.

It also continued to provide uninterrupted support to customers, with an operational helpdesk service available every day for 24 hours. Technicians continued to operate under maximum security conditions, both for the regular maintenance and evolution of the backbone network and for the necessary infrastructure interventions.

In addition, to meet the needs of this period, in April 2020, Unidata created and made available to the community, free of charge, a new HD video communication and videoconferencing service with high-performance features called UniMeeting.

UniMeeting is a particularly flexible, intuitive and friendly service, available both on PCs and through the Apps for smartphones (Android and IOS). Based on opensource software, it allows direct and immediate video communication from the web without having to install software and Apps. Thanks to Unidata's technical optimization work, it has been made flexible and scalable with technologies that have enabled it to have considerable processing and network capacity. High-capacity internet connections with the most important Italian and European Internet Exchange Points and the best international transits enable high-quality performance and high service availability.

To implement existing communication systems, Unidata has also proposed a new integrated connectivity solution, "Universe." This new product aims to bring the potential of network services to an unprecedented level by combining the flexibility of the SD-WAN approach with state-of-the-

art security features. It makes the network more versatile and offers advanced protection against Internet threats.

Universe revolutionises and optimizes data traffic management, minimises the dependency of the network infrastructure, and enables the maximisation of return on investment on equipment, with considerable savings in terms of money and time.

With this new product, Unidata responds to the needs of an ever-increasing number of companies spread across the territory. It makes it possible to meet the new needs of remote work, often through video conference, the widespread use of Cloud solutions, the need for connection resilience and advanced security that require new working methods and better organisation.

The increasingly widespread of business-critical applications and IT tools based on Cloud technologies and the ever-increasing distribution of branch offices and subsidiaries across the territory and teleworking have led to the need for wide-area and flexible networks that offer control over business applications, security, cost savings and performance appropriate to Cloud applications.

2.7.2 Coverage of Grey Areas

As defined above, the Pandemic showed the importance of high-performance, widespread network coverage and shifted the spotlight back on the possible creation of a network company, the launch of calls for tenders for grey areas and season ticket vouchers for schools and families.

More specifically, in the document published by the Presidency of the Council of Ministers on 3 March 2015, called "The Italian Strategy for Ultrabroadband," a division of the country into white, grey and black areas is described.

The national territory has been divided into 94.645 sub-areas, identified by merging ISTAT census areas. Therefore, each municipality is divided into sub-areas, and the relevant database is managed by Infratel, an in-house company of the Ministry of Economic Development and the implementer of the Government's Broadband and Ultra-Broadband Plans.

The distinction between white, grey and black areas is relevant for the assessment of State aid to support the deployment of ultra-wideband networks, from the point of view of its compatibility with EU law. This classification is contained in the EU Guidelines:

- **White areas** are areas without ultra-broadband networks, where private investors do not intend to invest in the next three years;
- **Grey** areas are areas where an ultra-broadband network is present or will be developed in the next three years by a single private operator.
- **Black areas** are areas where at least two ultra-broadband networks of different operators are present or will be deployed in the next three years.

While white areas are eligible for State aid under certain conditions, public intervention carries a high risk of crowding out existing investors and distorting competition in grey areas. In black areas, intervention risks causing serious distortions of competition, and it is highly likely to be incompatible with the internal market.

Unidata has signed an investment agreement with the European fund Connecting Europe Broadband Fund or CEBF—participated by Cassa Depositi e Prestiti (Italy), Caisse des Depots (France), KFW (Bank aus Verantwortung - Germany), European Investment Bank, European Commission, and other private institutional investors—whose management is entrusted to Cube IM (Cube Infrastructure Managers).

To this end, a company called Unifiber was set up, which will be responsible for the construction of a fiber-optic access network in the grey areas of Lazio to serve both residential and business properties.

In this context, there will be a commitment by Unidata to acquire, according to Use for Pay mode, a share of the network created by Unifiber, depending on the type of area.

UNIFIBER is a non-vertically integrated operator, which will only build passive access networks (primary and secondary) and will only sell in the wholesale-only mode.

Unifiber aims, over the period 2021-2023, to achieve:

- 60.000 housing units by granting network use to other operators,
- 55.000 housing units on behalf of Unidata,
- 5.000 business units on behalf of Unidata.

In detail, the grey areas concerned are:

- Fiumicino
- Ciampino
- Viterbo

Network built by Unifiber for other operators

	Target 2021	Target 2022	Target 2023
Fiumicino	8.000	5.000	2.750
Viterbo	7.500		4.000
Ciampino	10.000	3.500	3.500

Table 4"Unifiber grey area coverage targets for third parties"

- Anguillara
- Bracciano

Network built by Unifiber for Unidata

	Target 2021	Target 2022
Anguillara	4.500	
Bracciano	1.500	5.250

Table 5Unifiber Grey Area Coverage Targets for Unidata"

2.8 DEVELOPMENT OF DATA CENTRE AND CLOUD SERVICES

GRI 102-29 203-1

The world of data centres and cloud computing has undergone a series of extremely significant transformations over the past ten years, driven mainly by the advent of phenomena such as cloud computing and edge computing. This is not only a paradigm shift in technology but also in performance, which is now much higher thanks to improvements in infrastructure that allow efficiency to be increased by around 80%.

As an enabler, the Cloud has become particularly important because of its ability to enable companies of all sizes to benefit from highly advanced digital services without implementing the latest generation of IT infrastructure in-house.

To meet these needs, Unidata provides its customers with housing, hosting, server colocation, backup, disaster recovery, virtual data centres and the most innovative storage services in the Cloud in complete security.

From an infrastructural point of view, the data centre is the beating heart of the business because it houses all the equipment that allows processes, communications and services to be governed in support of any business activity. Whether owned or outsourced, the data centre is the cornerstone of business continuity.

Unidata's Cloud Storage allows you to create your own dedicated data centre, virtual or physical, to renew your customers' IT infrastructure and to migrate to the Cloud with ease. It can count on a Data Center designed to offer high performance, with security and solution quality levels corresponding to TIER III and IV certification level and guarantee:

- Security, reliability, speed of infrastructure
- Tailor-made, reliable and secure cloud storage services
- 99,99% SLA level guaranteed, backed up by direct customer service, with competent staff on call seven days a week
- Data security: Unidata guarantees the control of technical premises through 24-hour surveillance, technological control systems and internal and external video surveillance.

It is also possible to select the type and size of servers to be created, choosing from various configured profiles.

According to studies by the Cloud Transformation[1] Observatory, in 2020, the Italian cloud market exceeded € 3,34 billion in turnover, up 21% from the previous year. The healthcare emergency phase certainly contributed to this increase, with cloud adoption in SMEs rising to 42% from a previous year-on-year average of 30%.

The emergence has also driven the adoption of Software-as-a-Service (SaaS) services, which, growing by 46 percent in 2019, now account for half of all spending in Public & Hybrid Cloud. This growth is driven by the rapid adoption of cloud-based collaboration and document management

[1] https://www.osservatori.net/it/ricerche/comunicati-stampa/cloud-italia-mercato-2020

services and the strong *push* into e-Commerce services. This is followed by Infrastructure-as-a-Service (IaaS), which will account for 36% of total spending in 2020, and Platform-as-a-Service (PaaS), which will represent 14% of the total.

The data measuring the adoption trend of the different types of infrastructure is also very interesting. The Public or Private Cloud transition continues among large enterprises: 11% say they no longer have their own data centre. At the same time, Public & Hybrid Clouds are growing by 30%, reaching a total value of € 2 billion out of € 3,34 billion.

Furthermore, while infrastructure services hosted at external providers are growing by 11% (€ 732 million), the modernisation of *on-premises* infrastructure is slowing down. Evidently, companies have realised that it is more cost-effective to redesign the infrastructure location map than to insist on renewing their own owned facility.

Regardless of the emergency, the Cloud remains the most impactful of the technologies; 93% of companies consider its impact relevant or very relevant, compared to 74% for Cybersecurity and 68% for Big Data Analytics. In particular, considering SMEs, the healthcare emergency has generated a significant increase in Cloud adoption (as mentioned +42% compared to +30% in the previous year), contributing to recognizing its fundamental value even in smaller business contexts.

To understand the future of Data Centres, it is necessary to know what they are and how they have evolved. Originally designed to store and share data and applications, today's Data Centres are evolved infrastructures from the past and are still undergoing a process of continuous transformation.

So what is in the future of data centres? What is driving the change?

The increasingly strategic importance of data and its intrinsic value—destined to increase more and more in the coming years—and, consequently, of the techniques and tools with which it is processed, shared and stored.

It should also be emphasised that the success and longevity of any company's activities and business depend on such operations.

For Unidata, the strategic driver is to keep pace with what the market has to offer to meet the needs of its customers and thus chart the future course in terms of digital transformation and IT strategies.

A first important concept—which, in recent years, has marked the future of data centres—is that of 'colocation' (also known as 'housing'), which refers to the outsourcing of servers and corporate storage.

However, it is not simply a matter of renting space. It also means taking advantage of management and supervision tools such as business intelligence software, asset monitoring and remote support 24/7/365 offered by colocation services, as well as the advanced power and cooling capabilities made available to businesses, thus reducing the costs of the entire infrastructure.

Unidata's Data Centre is equipped with fully redundant Tier III and Tier IV equipment to offer services for equipment placement such as Servers, Storage and Customer-owned network equipment.

Placing own equipment in a high-specification Data Centre guarantees reliability, physical security of access and availability of very high Internet connectivity capacity. In addition, customers can take advantage of accessory services that Unidata makes available to them, such as Hosting and Cloud and other professional services (Managed Services).

Another trend of the last decade—and still ongoing—is the creation of Software-Defined Data Centres (SDDC), i.e., software-defined infrastructures capable of making processing and storage power virtual.

In short, 'virtualisation' refers to the possibility of abstracting the hardware components of data centres to make them available to software in the form of a virtual resource.

There are many companies that, for security reasons, have chosen to abandon the cloud altogether, switching instead to colocation solutions or using software-defined infrastructure to create a 'private cloud' in virtualised servers.

However, the need for public cloud services remains. It is precisely in response to this need that data centres have developed hybrid cloud architecture and multi-cloud solutions that enable them to benefit from the power of public cloud computing, i.e., the provision of services over the Internet—from a set of pre-existing resources that can be configured and made available remotely—that ensure a level of security comparable to that of a private network.

With more and more businesses turning to cloud computing solutions, there is an increasing demand for infrastructure capable of supporting them, i.e., hyperscalable infrastructure, larger than most corporate data centres, with the ability to host thousands and thousands of servers.

In this context, Unidata has decided to expand the structural dimensions of its data centre in 2019, from an available area of 300 square metres to the current 600 square metres.

The need for oversizing is due to the fact that the amount of data far exceeds the trend in technological innovation in terms of both power and size. The problem is not the amount of data exchanged daily but the amount of time it has to be stored.

Some retention periods are determined directly by law or by contract, while others are self-determined by the data controller. When the starting point for identification is the legislative dictate, an already determined requirement must be applied. In December 2017, for example, the legislature amended the obligations incumbent on telephone operators by increasing the retention period for telephone and internet traffic data to 72 months.

Business decisions and strategies are based on historical data analysis, so the more information available, the more accurate the choices.

For this very reason, recent years have seen a proliferation of algorithms and artificial intelligence systems, including machine learning and deep learning applications, capable of extracting strategic and valuable information from data for each company.

Today, the challenge for Unidata is precisely that of guaranteeing the amount of power required to process the data within the framework of these applications, thus entrusting Data Centres with an important role in the continuous growth of AI technologies.

And speaking of challenges, the evolution of IT architectures to exploit the value of machine learning and deep learning provides many of these.

In particular, companies must bear in mind that, in the next few years, to cope with increasingly complex workloads generated by machine learning and deep learning algorithms, the standard servers of conventional data centre infrastructures will no longer be sufficient. Instead, it will be necessary to design infrastructures that can predict, for example, computational capacities and function as a sort of 'test environment' in which to experiment with different artificial intelligence models.

In short, the traditional Data Centre infrastructure will have to able to transform itself, making room for the new and changing into a heterogeneous architecture, capable of hosting different types of hardware accelerators according to specific company needs.

2.8.1 Cloud challenges and interoperability

Interoperability is an increasingly common term when it comes to cloud computing and shared development platforms. Those working in the world of distributed web applications have to deal with the problem of controlling operations on a daily basis, and although they have a good number of services available to help solve the problems of integration between applications developed from different sources, they see several problems arising as an adjunct to these services which are the flip side of the coin.

The most interesting aspect of application operations in the cloud era is the growing need to maintain control over an organisation's applications against the loss of control over key elements on which applications depend. For example, dealing with updates to third party services, managing changes in network availability or even ensuring that data is sent to the right place via the right delivery service are all tasks where operations can only affect one side of the equation, trusting that right changes will be followed on the other.

Operations today face a high degree of complexity due to the volume of integrations between data elements and software, both within and across company boundaries. It is no longer a good idea to think of individual applications in isolation or to think of a data element as a user, or a group of users with a common goal in using that data.

It is not enough to focus on software and protocols, but it is essential to start working together as an ecosystem to overcome institutional barriers for better IT interoperability. Perhaps the first step towards achieving it is to bring operations to work closer together on product engineering, deployment and management of new servers and infrastructure.

Unidata will be committed to implementing the cloud application system in the near future to enable the growth of data centre usage.

The company is developing the business unit with a dedicated commercial area from 2021 onwards. The restructuring will include the development of the cross-selling strategy alongside product renewal.

2.9 QUALITY AND SAFETY OF THE SERVICES OFFERED

GRI 203-1

2.9.1 Fiber and Networking

Since the beginning of its activity, Unidata's mission has been to ensure the integrity, quality and security of the service offered, both for wholesalers and end-users. For this reason, the company is committed to preventing possible inefficiencies and controlling the correct functioning of the equipment to guarantee high-quality standards.

To this end, many actions and investments have been introduced, such as renovations and upgrading infrastructure to increase security.

In addition to guaranteeing a high level of quality throughout the territory, Unidata is also committed to providing maintenance services to its customers.

As emerging from the implementation activities of the Enterprise Risk Management system, the risk of having a network infrastructure that is not adequate to guarantee service availability levels in terms of reliability has been identified and managed with a medium-high level of effectiveness and efficiency. The risk is mitigated thanks to the specific architecture on which the infrastructure is based, the use of high availability systems, and the equipment's redundancy.

The preventive planning activities carried out by the managers follow a consolidated process to contain possible malfunctions of the network. Generally, they include an operational margin to deal with the onset of possible emergencies. In addition, preventive maintenance, carried out on several pieces of equipment in a satisfactory manner, plays a central role in preventing the risk of service unavailability, precisely because of its precautionary nature.

The monitoring process is structured to prevent critical situations and ensure the proper functioning of the network infrastructure. The signal quality control activities aim at reducing possible signal malfunctions and at allowing the timely intervention of the technical teams in the field.

2.9.2 Data Centres and the Cloud

Data has become economically important for companies and, above all, for *criminal hackers*. Therefore, it is important to design and manage a data centre according to the good rules of business continuity, resilience, and risk management.

With a view to *business continuity* and *security & resilience*, it is fair to ask how the digital data centre infrastructure underlying companies' operations is managed, as it currently plays an increasingly important role.

Data center security includes *best practices* and preliminary activities to protect a data centre from threats, attacks and unauthorised access. Among others, data centre security includes following two aspects:

- physical security (requiring planning of sites to limit physical intrusion)
- network security (security solution engineers install firewalls and anti-malware programs to prevent breaches).

More recently, IT security has become a major factor in data centre protection.

Because the data centre houses the information, applications and services that companies use daily, Unidata ensures that adequate security measures are in place to protect its data centres. If the data centre is not protected efficiently, data breaches can occur, and sensitive company or even customer information can be exposed and stolen, causing huge damage, both financially and in terms of the companies' reputation. In addition, the speed of technological innovation means that security threats also continue to evolve rapidly.

Unidata also provides Denial of Service (DoS) services to prevent the deliberate interruption of business continuity by a cybercriminal who, through a targeted action, breaks the connection between any computer (client) which then no longer has access to IT resources, whether it be the network, a server, an application or an entire data centre.

As data centre technologies become increasingly virtualised, the need to implement data centre security at the infrastructure layer becomes more compelling. Software-integrated security enables a more granular approach to security and greater agility and adaptability in the event of security threats.

The most efficient security solutions for data centres include tools for both physical and virtual security. Because the equipment inside a data centre is both sensitive and bulky, special considerations must be made concerning physical security. It's well known that water and electronics don't mix, so traditional fire protection systems cannot be implemented in the data centre. In addition, because data centres are connected to external networks via user access, IT administrators must ensure that appropriate network and user security policies are implemented at each data centre access point. Virtual security measures include systems to confirm the identity of authorised users, such as multi-factor authentication, and software, such as a firewall, to prevent access to unauthorised users.

As far as physical security is concerned, Unidata has provided different levels of security for its central data centre.

The first level is characterised by the reliability of the surveillance provided within the Commercity perimeter. In addition, the commercial polo is equipped with 24-hour surveillance and video surveillance.

The second level of anti-intrusion security involves a double door to Unidata's premises.

Finally, Unidata has a further level of security guaranteed by access controls using specific identification badges for the type of task and intervention. The data centre area has been strategically arranged so that it does not border on any external walls. The same care is also applied to all external equipment needed to power the data servers. In fact, the air conditioning and generator rooms are protected by steel structures that are only accessible to authorised users.

Regarding the analysis of sensitive data, this is only allowed to legitimate parties (e.g., law enforcement agencies) following specific requests, and consultation of such data is subject to tracking.

To guarantee the continuity of the services offered, Unidata's data centres are structured as follows:

- Differentiated access of data transmission cables through a double fiber-optic line;
- Two different power cabins which, in turn, connected to two different power generators. This safety system is activated both in the event of a power failure and in the event of scheduled maintenance to ensure continuity.

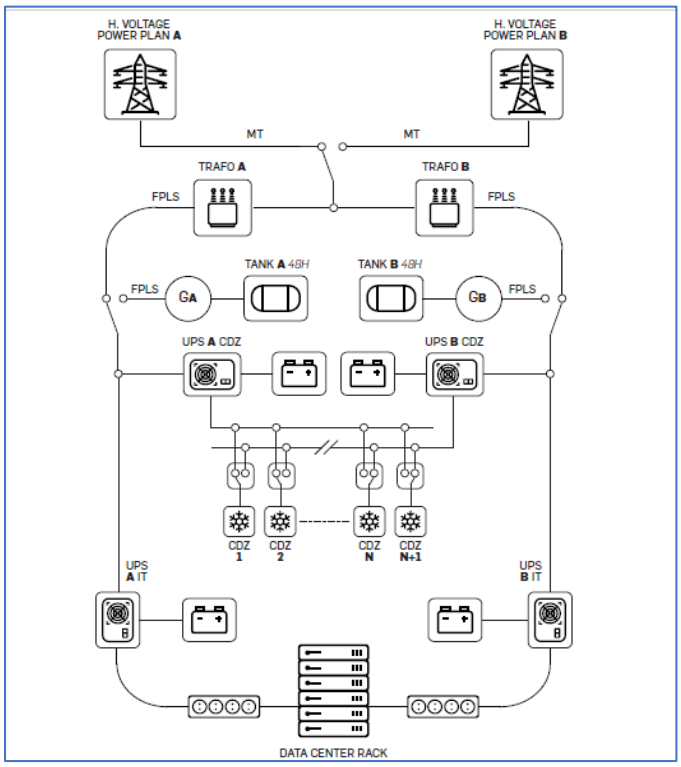

Figure 16Unidata headquarters data centre structure"

To cope with the risk of flooding, Unidata has provided:

- the installation of data centres on a floating floor, which involves the interlocking installation of planks, boards or tiles at a certain distance from the surface to be covered. The flooring is usually placed on top of a raised frame, foam or other sub-floor to minimise water accumulation in the event of a break of underground pipes. Ground pumps are also installed and are activated in the event of an emergency.
- state-of-the-art flood sensors
- cables placed over data centres

To avoid the risk of fire:

- Vezda sensors, which are designed to control air smoke.
- inert fire-fighting gas (argon 50% and nitrogen 50%)

- all equipment is certified
- automatic unlocking system linked to doors and gates in case of emergency
-

2.9.3 Data security

On the processing of personal data Unidata:

- provides its users and suppliers with the protection provided for by European legislation, i.e., EU Regulation 2016/679 called General Data Protection Regulation or GDPR.
- makes available the general information on the terms of the processing carried out in compliance with the regulations in force, in the specific "Privacy" section of the website www.unidata.it.
- adopts suitable physical and logical security measures concerning the acquisition, archiving and processing of personal, sensitive and judicial data as well as telephone and telematic traffic data. Furthermore, archiving is provided for the fulfillment of the so-called compulsory justice services according to art. 96 of the Electronic Communications Code.
- ensures full compliance with the new regulatory provisions on 'data portability' and 'right to be forgotten' contained in the GDPR.

In the field of Cyber Security, Unidata:

- guarantees at all times the availability of a so-called "anti-fraud telephone" system aimed at protecting end-users from any unlawful and improper use of the telephone service;
- adopts a specific procedure for the possible management of abusive data access events (so-called Data Breach) according to the regulations issued by the Privacy Guarantor;
- adopts an Information Security Management System that complies with the standards set out in ISO/IEC 27001, with extensions 27017 (cloud services) and 27018 (personally Identifiable information in cloud services);
- has acquired AGID cloud computing certification as a provider of cloud services for PA;
- constantly manages the reports coming from the national bodies in charge of Cyber Security, such as the current National CERT (Computer Emergency Response Team) set up at the Ministry of Economic Development;
- has structured, for the security purposes set out above, in its own functional organisation chart, two distinct inter-function Services responsible for intervening in the eventuality of accidents occurring to the physical and/or IT service infrastructures.

2.9.4 Quality of Services

Unidata aims to guarantee the quality parameters envisaged by the regulations in force, with particular reference to the provisions, where applicable, of the resolutions of the Communications Guarantee Authority.

It identifies, from year to year, the quality standards to be pursued in the provision of the company's services and communicates them to users, together with an indication of the results achieved, by publishing an annual report and half-yearly reports on its website.

These standards are of a general nature when they refer to all the services provided by Unidata or of a specific nature when they refer to individual services provided to users by Unidata.

Unidata has identified the following quality standards for electronic communication for the current year, defined and measured within the limits of the company's current possibilities and potential:

- Service activation time
- Failure rate
- Malfunction repair time
- Response time to calls to the operator's Customer Care Services
- Disputed debts

1) Service activation time: to be understood as "the time elapsing between the day on which the order is registered by the operator and the day on which the service is available for use by the person requesting the service."
2) Malfunctioning rate: to be understood as "the ratio between the number of reports made by users of actual malfunctions during the observation period and the average number of broadband access lines, measured monthly, during the same period."
3) Malfunction repair time: to be understood as "the time between the customer reporting an actual malfunction and restoring full functionality (repair of the malfunction)."
4) Response time to calls to operator's Customer Care Services: currently, Unidata Customer Care services do not present an IVR (Interactive Voice Response) but direct access to a so-called "Human Operator." This does not allow to carry out the required detailed measurements. Therefore, the "time interval between the moment in which the selection of the assistance number is correctly completed and the instant in which the human operator responds to the user to provide the requested service" is measured and duly evidenced.
5) Disputed Charges: to be understood as "the percentage of invoices for which the user has made complaints (in writing or another form recognised by the operator and traceable) with respect to the number of invoices issued in the same period."

			2020	2019	Variazione
Tempo di attivazione del servizio	Ordini di prima attivazione relativi a un servizio di accesso a banda larga a Internet rivolto allo stesso operatore che fornisce il servizio di accesso diretto per una linea telefonica già attiva	Percentuale degli ordini validi completati entro il termine massimo contrattualmente previsto	98,65%	92,50%	**-6,15%**
		Media giorni solari	27,04	38,5	**11,46**
	Ordini di prima attivazione rivolti a un operatore del servizio di accesso a larga banda a Internet diverso da quello che fornisce il servizio di accesso diretto per una linea telefonica già attiva	Percentuale degli ordini validi completati entro il termine massimo	97,92%	91,0%	**-6,92%**
		Media giorni solari	25,30	40,98	**15,68**
	Ordini di variazione dell'operatore che fornisce il servizio di accesso a Internet per una linea in cui è già attivo ilservizio di accesso a larga banda a Internet	Percentuale degli ordini validi completati entro il termine massimo	98,45%	99,00%	**0,55%**
		Media giorni solari	11,40	7,18	**-4,22**
	Per servizi di accesso a banda larga Wireless	Percentuale degli ordini validi completati entro il termine massimo	98,25%	92,50%	**-5,75%**
		Media giorni solari	22,20	30,77	**8,57**
Tasso di malfunzionamento	a) Servizio realizzato con strutture proprie o Unbundling	Tasso di malfunzionamento	1,25%	1,25%	-
	b) Servizio realizzato utilizzando servizi wholesale	Tasso di malfunzionamento	2,20%	3,25%	**1,05%**
Tempo di riparazione dei malfunzionamenti	a) Servizio realizzato con strutture proprie o Unbundling	Percentuale delle riparazioni dei malfunzionamenti completate entro il tempo massimo contrattualmente previsto	96,25%	95,25%	**-1,00%**
		Tempo medio di riparazione (ore comprese quelle non lavorative)	14,60	17,08	**2,48**
	b) Servizio realizzato utilizzando servizi wholesale	Percentuale delle riparazioni dei malfunzionamenti completate entro il tempo massimo contrattualmente previsto	65,10%	65,06%	**-0,04%**
		Tempo medio di riparazione (ore comprese quelle non lavorative)	44,70	39,9	**-4,8**
Tempo di risposta alle chiamate ai servizi di assistenza clienti dell'operatore	Tempo totale di risposta dell'operatore umano	Tempo medio di risposta alle chiamate entranti (secondi)	29,60	37,4	**7,8**
		Percentuale di chiamate entranti in cui il tempo di risposta è inferiore a 20 secondi	89,40%	87,25%	**-2,15%**
Addebiti contestati	Percentuale di fatture per cui l'utente ha reclamato	Rapporto tra il numero dei reclami ricevuti nel periodo considerato e il numero di fatture emesse nello	0,18%	0,21%	**0,03%**

Unidata's objective for 2021 is to implement a "near real-time" reporting system for information on the quality of its services. This will include the creation of a dashboard that will allow continuous monitoring of quality indicators, contributing to the timely achievement of set objectives and the constant improvement of the services offered.

The software chosen is Jira, a highly specialised tool for monitoring bugs and tickets, as well as for shared management of all types of projects.

2.10 THE CENTRALITY OF THE CUSTOMER FOR UNIDATA

Unidata's objective is to guarantee an immediate and competent response to the needs of its customers, conforming its conduct to fairness in negotiations, transparency in relations and

contractual commitments, courtesy and collaboration, in the logic of customer focus and full compliance with the principles established by company policies and procedures.

Listening and collaboration are two key principles at Unidata for managing the ongoing relationship with consumers and the associations representing them.

This approach has resulted in drafting a Service Charter, i.e., the document that describes the standards of service provision and the rules of the relationship between Unidata and its customers to protect their rights in the best possible way.

The Consumer Protection Information or Service Charter has been drawn up in accordance with the Directive of the President of the Council of Ministers of 27/10/1994 on "Principles for the provision of public services."

Through the Service Charter, Unidata sets out a series of quality parameters for the services it provides, which it undertakes to guarantee, enabling customers to verify their effective implementation and providing useful information for users to submit reports, proposals, requests for clarification and complaints.

As a strategic company objective, Unidata pursues the continuous improvement of the efficiency of the services provided, adopting the most functional technological, organisational and administrative solutions for this purpose and ensuring the certified adoption of the requirements of a Quality Management System in accordance with the UNI EN ISO 9001 standard for the EA 33 sector (Internet Service Provider). The certification is currently being updated with the integration of the EA 28 sector (design and infrastructure).

Unidata's activity is also based on the principles of transparency and simplicity to guarantee customers' full and informed right to choose. This translates into the use of a simple and non-bureaucratic language in communication with the public. In particular, to guarantee the principle of choice, Unidata uses simple, clear and balanced procedures regarding the stipulation of contracts for the supply of services, withdrawal, and contractual amendments aimed at including, or excluding, the supply of additional services.

Unidata ensures that the public is fully and informed about the economic, legal and technical conditions for the provision of the services and aims to use the most appropriate means for communicating any changes to the aforementioned conditions.

In particular, Unidata ensures that the communication of any information to users is carried out under the principles of transparency, clarity, timeliness and good faith.

2.11 TECHNOLOGICAL INNOVATION AND DIGITAL TRANSFORMATION

GRI 102-29 102-12 203-1

Since November 2017, Unidata has been registered as an Innovative SME in the special section of the business register of the Ministry of Economic Development (Mi.SE).

Innovative SMEs are considered those that "*operate in the field of technological innovation, irrespective of their date of incorporation, corporate purpose and level of maturity, and meet the*

particular requirements." In order to be admitted to the Innovative SME register, it is necessary to have a functioning and active R&D function, highly qualified staff, and hold patents.

This further recognition adds to the set of qualifications obtained by Unidata, attesting to its activity, which has always been aimed at innovation and continuous attention to new technologies.

In recent years, digital transformation has assumed a key role in our country's economic policies and the European Union. New technologies are pervasively present in the lives of people and businesses, enabling new jobs, new processes, new products and new ways of working.

During the long pandemic crisis we are facing, Unidata has contributed to offering digital solutions, enabling people to work, have a social life and businesses to continue carrying out numerous activities, thus overcoming the constraints imposed by lockdowns and physical distancing.

Unidata's innovative capacity is the result of investments in research and development that, day after day, build the pillars on which the present and future of society is based, i.e., the stock of knowledge that enables it to progress. From simple apps to the most sophisticated cybersecurity systems, from artificial intelligence to the cloud, investments in research and innovation in the ICT sector have sustained the competitiveness of the economic fabric, playing an anti-cyclical role and anticipating new development opportunities.

Unidata is, in fact, involved in several regional and national research and development projects, both in the social and environmental fields. The projects in progress will be detailed in the paragraph *"Research, Development and ICT Solutions for Sustainable Development"* of the *ENVIRONMENT* chapter.

The difficulties that the world economy is facing require strengthening and, above all, the use of resources in the best possible way—resources made available by the European Union to its member states under the Recovery Plan.

Unidata has decided to seize this opportunity both for the good of the country and for future generations, contributing to the digital transformation of companies, technological consolidation and open innovation.

As already required by the Horizon 2020 programme and now even more so by the new approach of the Horizon Europe and Digital Europe programmes, the strategy for R&D and innovation in the ICT field is considered fundamental for the development of Unidata. Such a strategy must be efficient and systemic and address both demand and supply, enable the transfer of knowledge and the passage of innovations to the market, both by fostering greater interactions between users and developers of technologies and by creating greater synergies between different policies at European, national and regional level.

Gaining technological leadership in the innovative areas associated with digital transformation requires fruitful investment in ICT R&D and innovation.

The ICT sector is certainly one of the most innovative in the country, even if, in the last decade, the progression of ICT R&D investments in Italy has been slowed down by several following obstacles:

- Financial, i.e., due to the cost and procurement of risk capital;
- Technological, due to inadequate infrastructure and technology platforms;

- Economic, due to a lack of technological skills, a lack of sufficient economies of scale to justify new projects and low internationalisation.

Despite the obstacles, thanks to European initiatives and investments by larger firms, the dynamics of R&D expenditure and employment in the ICT sector have substantially improved, but not enough to reduce the gap accumulated over the years in relation to other advanced countries.

The development of ICT technologies is a key element in promoting innovation. Unidata places particular emphasis on this key issue in order to improve its competitiveness in the telecommunications sector.

Economies that have achieved competitive leadership positions in the development and production of ICT technologies and services showcase better performance on all key economic and social indicators such as:

- higher growth
- positive trade balance
- improved levels of employment
- higher levels of per capita income
- more qualified human capital
- greater awareness of the challenges of the future

Our country is facing critical issues concerning the production and use of technologies in the digital environment. Yet, despite this, the data on R&D at ICT companies and the related public allocations show signs of progress in recent years, thanks to a greater commitment of both companies (large and start-ups) and public bodies to the development of innovation in the ICT field.

Unidata is aware that it needs to invest productively in ICT R&D to keep up with companies in other European countries and, as already pointed out, is particularly active in the research projects in which it participates.

The objective can only be achieved by directing resources and energies towards those areas where there is the greatest chance of developing critical mass and thus impacting collaborative ICT innovation ecosystems. This requires implementing a strategic approach that orients initiatives towards clear objectives, assesses successes and criticalities, and incentivises the best performances.

The challenge is important but possible.

3 ENVIRONMENT

3.1 ENVIRONMENTAL IMPACT MANAGEMENT

GRI 102-29

Eco-sustainability is the buzzword of the moment: among green economy, ethical choices and materials with a low environmental impact, every innovation of the third millennium develops in harmony with nature.

Fiber-optics is the only truly sustainable, environmentally, and health-friendly means of data transmission.

Networks made up of copper contribute significantly more to fossil fuel emissions than all-fiber networks. It must be mined and processed using processes that create dust and emissions before installing it in cable form. The copper network has electromagnetic leakage and, because of its sensitivity to weather and temperature, requires constant maintenance, resulting in the need for new excavations and the generation of additional waste and gas. Therefore, even in FTTC architectures, the copper section must be constantly supplied even when not in use.

Full-fiber infrastructures, on the other hand, do not require energy when not used for transmission. In addition, they are more reliable and require less maintenance, with over 50% less movement of vehicles, materials and operating personnel.

In this way, the initial environmental impact of laying the fiber is quickly reduced to zero.

Eco-sustainability and fiber-optics is a combination that reinforces the commitment to technology and the achievement of targets to reduce global greenhouse gas emissions. According to Carbon Smart—the British eco-sustainability research company—FTTH fiber-optic infrastructures play a revealing role in combating global warming.

The report takes into account factors relating both to the lifecycle of the networks and their ability to enable innovative digital services: fiber-optic cable, with its flexible filaments and high conductive capacity, does not produce losses and breaks very rarely, so it needs less maintenance with less movement of vehicles, materials and operating personnel.

The other big environmental boost from fiber networks comes from their ability to fully support the development and widespread of innovative energy-efficient digital services.

Unidata is therefore committed to spreading green technology through its fiber-optic infrastructure.

Unidata's responsibility to protect the environment is reflected in all phases of fiber-optic construction, which is carried out in compliance with the numerous regulations in force relating to

the protection of the territory. The company's strategy is geared towards respect for and protection of the environment and the territory, as key factors in any ethically responsible business activity.

In addition to the ultra-fast fiber-optic network service offered, Cloud Computing is also an environmentally friendly technology. The Cloud is, by definition, a sustainable technology, according to the World Economic Forum analysis. In fact, cloud computing plays a key role in reducing greenhouse gases, helping digital technologies as a whole to drive a 15% reduction in global emissions. In the future, it is expected that connectivity will increasingly become a key factor for many of the 'virtuous' climate solutions, i.e., those able to generate 'exponential effects' on the reduction of greenhouse gases, leading digital technologies as a whole to play a key role in reducing global emissions.

As of 1 January 2020, Unidata has also become a plastic-free company.

The company pays a lot of attention to the use of plastics, specifically single-use plastics, which are the most polluting and difficult to dispose of.

Unidata has decided to take up the fight against single-use plastic by using alternative reusable materials and implementing simple measures:

- plastic bottles have been replaced by glass bottles;

- products packaged in glass or aluminium are used;

- it always prefers biodegradable products.

3.2 COMPLIANCE WITH ENVIRONMENTAL REGULATIONS

According to Article 25(3) of the Electronic Communications Code, the provision of electronic communications networks or services to the public is subject to a general authorisation which may be obtained by submitting a declaration of commencement of the activity, provided that the conditions and requirements laid down by the applicable legislation are met;

Unidata has been registered in the public list of Communication Operators since 29/10/2005.

The company is also in the process of certifying compliance with the UNI EN ISO 14001:2015 Environmental Management standard—to analyse, manage, monitor, and continuously improve the organization's environmental performance and activities.

The adoption of a certified system, regularly audited and updated, ensures that the work is effective and enables the implementation of various objectives, including:

- Controlling and minimising the environmental impact of activities, taking into account the operating environment, processes, products and services.
- More efficient, rational and conscious use of resources.

- Reducing waste (energy, resources and materials).
- Waste reduction and emissions.
- Compliance with environmental legislation.

Concerning the National Strategy for Adaptation to Climate Change (SNAC), the company commits to:

- minimise risks from climate change;
- maintain and improve the resilience and adaptive capacity of natural, social and economic systems;
- assess the opportunities arising from the new climatic conditions.

As previously examined, the Code of Ethics and the Company's Organisational Model respect the general principles aimed at respecting the environment and contain provisions to prevent the risk of offences according to Legislative Decree 231/01.

3.3 THE THEMES OF MATERIALITY ANALYSIS

GRI 308-1

As a result of the materiality analysis carried out for the environmental themes and context, the issues of greatest importance to the various stakeholders are:

- **Energy efficiency**

Energy efficiency is understood as the ability of a system to optimise results.

It is not only about saving money, but above all about being environmentally aware, reducing avoidable waste and preserving resources.

This has also been made possible by the new energy efficiency legislation and the certification for energy efficiency.

The **energy efficiency directive** in Italy was introduced with the UNI CEI EN ISO 50001:2011 standard "Energy management systems—Requirements and guidelines for use," which lists the minimum requirements that a system must detain.

Through the electricity supplier of its premises, Dolomiti Energia S.p.A., Unidata certifies its energy consumption on the bill, contributing to a measured reduction in CO2 emissions.

Dolomiti Energia SpA offers an innovative solution that allows any organisation to make its products eco-friendlier thanks to the "100% clean energy Dolomiti Energia" certification service.

The certification is based on the inputting into the grid (through the cancellation of GO certificates) of renewable energy, i.e., clean energy equal to the company's energy consumption.

The certification provided by the "100% Energia Pulita Dolomiti Energia" allows the company to communicate its commitment to the environment publicly and gives its core business added value: environmental sustainability.

- **Climate change and emissions**

Climate change is the major global challenge of the 21st century, and responding to it requires the active involvement of all stakeholders, including the private sector.

According to estimates by the Intergovernmental Panel on Climate Change (IPCC), global warming has become a reality; the temperature has increased by 1 °C compared to pre-industrial levels and, if it continues to grow at the current rate, the increase is likely to reach 1.5 °C between 2030 and 2050. Moreover, greenhouse gas (GHG) emissions have been rising steadily over the last decade, and there is no clear sign of a slowdown/reversing in this trend.

A zero-emission economic system in the second half of this century, as envisaged by the Paris Agreement, will require significant technological, social and economic transformations.

The fight against change must be accompanied by promoting a just and inclusive transition and creating sustainable and decent jobs (the so-called 'just transition'), with particular reference to SDG 13 'Combating Climate Change.'

3.4 ENERGY CONSUMPTION AND EMISSIONS

GRI 102-29 302-1 302-2 302-3 302-4 305-1 305-2 308-1

In carrying out its activities, Unidata uses various sources of energy from both non-renewable and renewable sources.

Concerning non-renewable sources, diesel is used as fuel, both for the carburation of the car fleet and for the powering of the generator sets within the infrastructure. However, the amount of energy used by the generators is marginal, as they only come into operation in emergencies or when the electricity supply is interrupted.

Unidata's car fleet, which is used for commercial activities, inspections and installation and maintenance operations, consists of 45 mixed-fuel vehicles. Specifically, there are 8 vans and 37 cars assigned to employees and managers.

As regards the electricity consumed within the premises for lighting, powering office equipment, heating and cooling the premises and powering the data centres, it is partially produced indoors by the photovoltaic system owned by Unidata and the remainder is supplied by the company Dolomiti Energia S.p.a.

		Interior		Exterior	
Typology		**Data Center branch office**	**Generator sets**	**POP**	**Car fleet**
NON-RENEWABLE SOURCES	*Diesel fuel (litres)*		9.000		
	Petrol (litres)				8.879
	Diesel (litres)				46.472
	LPG (litres)				14.771
	Electricity (KWh)	86.241		35.550	
TOTAL			**9.000**	**35.550**	**70.123**

Table 6"Unidata consumption from non-renewable sources"

		Interior		Exterior	
Typology		**Office & Central Data Centre**	**Generator sets**	**POP**	**Car fleet**
RENEWABLE SOURCES	*Photovoltaics (KWh)*	81.339			
	Green Energy (KWh)	1.225.799			
TOTAL		**1.307.138**			

Table 7"Unidata consumption from renewable sources"

The energy produced independently in 2020, through the exploitation of the photovoltaic system installed to cover the company's external car parks, covered around 6% of the structure's overall consumption.

Unidata intends to switch to completely green energy consumption within the next few years.

Specifically, the company has set a target for renewing the car fleet to encourage the use of less polluting vehicles. Over the three-year period, 2021-2023, Unidata plans to replace at least five diesel and petrol vehicles with the same number of plug-in hybrid or fully electric vehicles.

Fully electric and hybrid cars have virtually zero emissions of CO2—the main contributor to the greenhouse effect—compared to petrol and diesel models.

Unidata is also committed to switching to energy consumption from renewable sources by 2022, including powering the data centres in its branch offices.

3.4.1 Energy Intensity Ratio

With the available data, it is possible to calculate energy intensity as an approximate indicator of the organisation's energy efficiency. The indicator compares the amount of energy consumed with the amount of energy produced internally.

The Energy Intensity Ratio produced by Unidata is around 0,1%.

3.4.2 Direct greenhouse gas emissions SCOPE 1

DIRECT GREENHOUSE GAS EMISSIONS SCOPE 1	
	Co2 equivalent (kg)
GENERATORS	
Fuel	**23.850**
HEAT PUMPS	
Fluorinated gasses	**321,2**
CAR PARK	
Petrol Diesel LPG	21.310,32 120.828,08 25.111,14
Total	**167.249,54**
FIRE EXTINGUISHING GAS	
Inert gas	**0**

Table 8"Direct GHG emissions"

Within the domain of Scope 1 greenhouse gas emissions, some of these have been reduced by using inert fire extinguishing gases, which do not emit greenhouse gases.

Emissions from the use of fuels for heating and cooling the premises, emergency generators and the car fleet were then counted.

3.4.3 Indirect Greenhouse Gas Emissions SCOPE 2

Scope 2's indirect greenhouse gas emissions have been completely eliminated at the company's site using totally green and therefore zero-emission energy production facilities.

Through the supply of energy by Dolomiti s.p.a, Unidata has prevented the emission of 390,049 kg of CO2 in the environment for the entire year 2020.

The only indirect Scope 2 emissions are those generated by the consumption of electricity from non-renewable sources. Those related to the use of external POPs and the data centre of the branch office have been considered.

INDIRECT GREENHOUSE GAS EMISSIONS SCOPE 2	
Typology	**Co2 equivalent (kg)**
PoP & Data Center branch office Electricity	42.627

Table 9"Indirect GHG emissions"

3.5 ENVIRONMENTAL RISKS

GRI 102-15

Based on the issues that have been examined, possible related risks are listed below:

1. *Risks related to the energy consumption of the infrastructure used*

The growth in consumption closely linked to the exponential increase in data traffic is one of the key environmental challenges for the telecommunications sector.

This growth is related to the increase in electrical energy required to support data transmission, and as a result, has the potential to lead to a significant increase in indirect CO2 emissions into the atmosphere.

The risk in question has been mitigated, as mentioned above, by Unidata's decision to supply the data centre system with energy entirely from renewable sources.

In general, the integrated national energy and climate plan set the target of reducing greenhouse gas emissions at the European level by 2030 by at least 40% compared to 1990.

This reduction is split between the ETS (energy industries, energy-hungry industries and aviation) and non-ETS (transport, residential, tertiary, non-ETS industry, agriculture and waste) sectors, which are expected to be 43% and 30% less compared to 2005.

The European Green Deal sets the EU on a path towards achieving climate neutrality by 2050 through the deep decarbonisation of all sectors of the economy and a major reduction of greenhouse gas emissions by 2030.

Possible solutions:

- Energy-saving strategies
- Use of renewable sources
- Environmental control and emission reduction measures

From Enea studies:

- ICT equipment and services are currently responsible for about 8% of electricity consumption in the European Union and about 4% of the CO2 emitted into the atmosphere.

- data centres are responsible for around 18% of the ICT sector's energy consumption, with CO2 emissions growth rates of around 7% per year.

2. *Risk of incurring sanctions or measures for non-compliance with environmental regulations*

This risk, i.e., non-compliance with current regulations on electromagnetic and/or acoustic emissions, environmental protection, location of stations, town planning, is constantly mitigated by the monitoring activities carried out jointly by the Unidata network design managers and the Legal Department.

In this regard, Unidata is in the process of obtaining UNI EN ISO 14001:2015 certification to encourage a conscious commitment to compliance with sector regulations and the development of self-control methods aimed at the continuous improvement of its environmental performance.

The guarantee that its environmental management meets internationally recognised requirements can ensure:

A. Guarantee of legal compliance

- minimal risk of violating environmental legal obligations
- the possibility of establishing an open and cooperative relationship with public authorities and bodies
- better relationship with the surrounding community

B. Controlling and reducing negative impacts on the environment

- identification of management areas in need of improvement
- rational planning of necessary activities

C. Rationalising and saving energy and raw materials

- identification of opportunities to improve the efficiency of production processes
- reducing waste of energy and raw materials
- reducing production costs

D. Optimising and saving internal resources

- organisation and planning of activities
- improving environmental and safety management
- increase in added value
- reduction of overlaps, duplications and unnecessary bureaucracy

E. Reducing costs

- increased efficiency of the organisation
- minimum risk of sanctions or fines for non-compliance with legal obligations
- lower insurance costs
- lower intervention and recovery costs in the event of an accident

F. Improved company image on the market

- positive publicity of the company in the eyes of customers and suppliers
- promotion and dissemination of an image of modern and efficient development

3. *Risks related to natural disasters (cloudbursts, earthquakes, flooding, etc.)*

One of the main orientation criteria of the sustainability policy is the reduction of environmental risks. Particularly relevant is Natural Risk, understood as the product between the probability of a potentially dangerous natural phenomenon occurrence and the economic value of the structures present within the area. The frequency of such disasters is increasing due to climate change, with the manifestation of extreme events that impact, directly or indirectly, the safety of production facilities and workers.

Such an unpredictable scenario makes it essential to adopt adaptive behaviour. For Unidata, each catastrophic event represents a lesson learned from which to strengthen the design techniques and preventive measures to make the plant park more resilient.

In this perspective, the method and information extracted from ex-post analyses of events that allow the definition of processes and practices for the mitigation of similar events in the future play a crucial role.

4. *Risks related to construction excavations for infrastructure building in protected territories. Plans necessary for environmental restoration and rehabilitation*

The Systems responsible for the excavation and restoration phases will use the most environmentally sustainable procedures and technologies currently available to reduce the invasiveness of interventions in cities, especially in protected areas.

In particular, we are referencing the traditional mini-trenching and reduced mini-trenching, which efficiently and innovatively minimise both environmental impact and inconvenience to the community; i.e., where infrastructure permits, 'no dig' techniques will be applied.

This type of procedure is designed to lay underground pipes and cables, including the rehabilitation of existing infrastructure. In any case, these are indirect risks related to the contracts awarded to external Systems.

3.6 RESEARCH, DEVELOPMENT AND ICT SOLUTIONS FOR SUSTAINABLE DEVELOPMENT

GRI 102-12 102-29

Technology is changing at an increasingly rapid pace. Pervasively embedded in the economic system, it determines its responsiveness and resilience in the face of economic shocks, even the most devastating ones, as seen with the crisis induced by the current SARS-CoV-2 health emergency.

For this reason, technology is a target and a player in all national and European initiatives to relaunch the economy. In particular, research and technological innovation are key factors for ensuring sustainable and inclusive development in post-pandemic recovery, strengthening the resilience of production sectors, the competitiveness of economies and the transformation of economic and social systems into digital and green ones.

According to a recent study by the Global e-Sustainability Initiative, it is crucial to ensure the global deployment and diffusion of the following seven technology solutions already on the market today:

- basic connectivity (mobile and fixed)
- cloud
- machine learning and artificial intelligence
- blockchain
- 5G
- ultra-fast connections
- Internet of Things (IoT) and virtual reality.

To realise these benefits, however, the sector must act to reduce its environmental impacts to ensure that technological development is also sustainable for the planet.

Unidata's major commitment is linked to the impact on climate change and the reduction of the *carbon footprint*; increasing attention is also being paid to the management of electronic waste in a logic of circular redesign of the entire supply chain, from device manufacturers to consumers.

The company owes its growth over the decades, and its very birth, to the interest that has always characterised the founders and the main protagonists of its history. What most characterises Unidata is—even today—its curiosity and serious dedication to the most relevant technological innovations.

During the year, certain phases of the Log-On project—an ambitious innovation and development project on urban logistics, led by a group of over thirty Italian companies in cooperation with research centres and universities—have continued.

The project involves the study, development, testing and pilot experimentation of a complex, innovative platform of services and components for urban logistics. The project aims to contribute to the rationalisation of the urban logistics system, reducing overall costs and expanding the economic base of the logistics market itself by tapping into the available niches of own account and vertical services.

Unidata is also the leading partner in three research and development projects for calls issued by the Lazio Region under the 2014-2020 POR-FESR.

The *"AMORE" project, which* stands for Advanced Manufacturing and microelectronics to Optimise the Wireless Networks of Things, is a research and development project in the IoT and Big Data field to create and optimize a network dedicated to smart objects.

The AMORE project aims to competitively reposition small and medium-sized ISPs in the Lazio region, taking them from being "people operators" to "things operators," investing in the creation

of an innovative IoT LPWA LoRa network that can optimally manage tens of millions of devices in the same urban area.

The proposal's objective is the design, development, deployment and validation within industrial application scenarios of a Lazio LoRa Low Power Wide Area (LPWA) wireless IoT network. To achieve this objective, the project will focus on four specific areas of research and development.

- Microelectronics for end devices: a System On Module controlled by a finite state machine to dynamically maximise radio performance.
- Network control and management, through the development of a network controller and related scheduling algorithms, to coordinate and optimise access between the (numerous, up to 500 when fully operational) gateway (radio base) stations to exploit the spatial distribution of objects and minimise interference between simultaneous transmissions, and include time *constraints for time-critical applications.*
- Big data real-time analytics, for scalable profiling and behavioural analysis of devices distributed throughout the Lazio region (when fully operational, up to tens of millions), and detection of anomalies and emerging *distributed denial of service* (DDOS) cyber-attacks (e.g., DDOS attacks by IoT botnet Mirai https://www.americansecurityproject.org/the-rise-of-iot-botnets)
- Data forwarding, through the development of a highly scalable 'network server' module for gateway management, analysis and filtering of data units in transit (deduplication, radio and interference statistics, etc.), management of cryptographic and protocol aspects relating to security, and support for multi-tenant scenarios of connectivity to third-party servers and provision of value-added functionalities (SLA monitoring, statistics, etc.).

The project will complement these technical activities:

- Analysis of application scenarios and use cases, and related identification of requirements
- System architecture specification and design
- Development of software and hardware components and integration of advanced control algorithms
- Field demonstration of the integrated system and application to representative scenarios, including energy smart metering and consumption profiling and optimisation for the green economy.

The project received funding of Euro 437,596 from the Lazio Region.

The *"IPSE PARSIT" project, which* stands for IoT Publish Subscribe Environment — For the Advanced Management of Recycling, Disposal, Citizen Information and Traceability, is a research and development project in the field of IoT and Big Data for the creation of an innovative publish-subscribe system in the Circular Economy sector applied to waste collection and the third sector. The project is co-financed by the Lazio Region with the resources of the POR FESR 2014-2020.

The IPSE PARSIT project aims to implement a digital technology platform for LPWA services and devices that enable optimal control of processes in the circular economy.

The aim is to promote a marketplace that stimulates the emergence of new business models and enables the traceability and measurement of the circularity level of a product. Furthermore, the

platform will be used in concrete scenarios, such as waste collection and charitable donations. The idea of the IPSE PARSIT MARKET-PLACE is based on the PUBLISH SUBSCRIBE service concept and on the architectural concept of a space that we call CRADLE SPACE—given the Cradle To Cradle context, i.e., the idea of designing systems by adapting industrial models to nature so that the materials used can be traced back to natural elements, thus being able to regenerate themselves.

The project can bring benefits such as:

- a mechanism in the PUBLISH SUBSCRIBE chain capable of generating a MARKET PLACE
- PUBLISH SUBSCRIBE mechanism can be implemented through elementary micro-services to which transactions, transitions, traceability, monetisation in the value chain, measurability indices can be associated
- the architecture based on CRADLE SPACE makes it possible to manage all individual cycles by applying homogeneous rules to transactions (product, monetisation, QoS, legislative).

In this way, a system is to be set up:

- modular, which will defer regulatory and business model complexities to specific rules for each CRADLE SPACE
- to trace each transaction, thus making it possible to provide traceability information and to generate specific analysis and appropriate circularity indices
  to allow the implementation of differentiated MARKET PLACE rules
- to allows the dynamic creation of new Cradle Spaces.

The IPSE PARSIT project is implemented by a specially designed partnership.

- Unidata, in the project, it will be in charge of the project coordination, and specifically of the activities related to IoT and TLC infrastructures, devices, back-end platforms for the collection/sending of device data.
- Paoletti Ecologia: operates in the field of environmental and urban hygiene, waste transport and disposal. The contribution to the project can be traced back to three fundamental points (1) in-depth knowledge and experience in the waste management sector and related regulations, (2) knowledge of the market segment and the players that populate the scenario, (3) availability of technical and human resources suitable for testing the project.
- 5EMME Informatica: expert in system integration, strategic partner in platform implementation. It will be in charge of back-end Publish-Subscribe platforms and Analytics management for BIG DATA, as well as SW and MW integration.
- CNIT: Research Organisation that will develop know-how on all three levels, contributing to the IoT part, optimizing back-end services, and the user experience of the operational application layers.

The project received co-funding from the Lazio Region under the ERDF ROP amounting to € 418.602,34.

The "*FRAGILI*" project aims at developing new sustainable technologies and new products and services for *"tele-assistance."* The project envisages developing a domotic support system for "fragile" people (with chronic pathologies, disabilities, multimorbidity, loneliness, and elderly) to support the NHS in the long term and to guarantee quality standards.

The objectives of the project are, therefore:

- Reducing social isolation of the frail person;
- extending the support of social service cooperatives beyond the "in presence" support to the frail person;
- prevent falls and pressure injuries;
- preventing urgent hospitalisation for diseases that can be treated at home if diagnosed early (respiratory diseases, heart failure, etc.);
- Checking the quality of care provided to the patient by non-professional caregivers (carers, domestic helpers, etc.) in terms of personal and environmental hygiene, level of comfort of the home and ventilation;
- to test and demonstrate the feasibility of a support system for the frail person which is affordable for the person, the social and health services and/or the patient's family;

The tools that will be implemented to achieve the project objectives are:

- IoT environmental devices with LoraWan technology (high reliability, immediate installation, long battery life, low costs);
- Contactless patient monitoring devices;
- BigData and Analytics system for studying operational models (alarms, precursors, anomaly detection, QoS indicators);
- Cloud aaS system for the operations centre and possible integration with local medicine and CAD services;

For the realisation of the *FRAGILI* project, Unidata collaborates with the CNR, the National Research Council, which among its many competences boasts research and excellence activities in the field of embedded devices and big data.

In addition to national R&D projects, Unidata is a partner in the ***"ELEGANT"* project**, which stands for secure and seamless EdGe-to-cloud ANalyTics, part of the HORIZON 2020 European programme.

The *ELEGANT* Project proposes a new paradigm of software unification for Big Data and IoT, enabling seamless interoperability through global orchestration of dynamic code movement, efficient use of available resources, and adaptive security features.

The Research will introduce a new unified Java API that will allow seamless execution of any source code already available on the data analytics (Big Data) side on IoT devices via a thin, lightweight application virtualisation layer. In this way, the Big Data framework will dynamically deploy on-demand any existing operator, thus turning all interconnected IoT devices into execution units.

A consortium has been set up for this project, which leverages EU expertise on Big Data, IoT, system software, DevOps and security, and unifies them together under a common execution and programming framework. The *ELEGANT* consortium consists of:

1. EXUS Software Single Member Limited Liability Company
2. The University of Manchester
3. Institute of Communication and Computer Systems
4. German Research Centre for Artificial Intelligence

5. National Interuniversity Consortium for Telecommunications
6. UniData SpA
7. Spark Works ITC Limited
8. UniSystems Luxembourg S.a.r.l.
9. Ubitech Limited
10. ITTI sp z o.o.
11. KTM Innovation GmbH

ELEGANT's objectives correspond to the ambitions of the EC as explained in the topic ICT-50-2020: Software technologies, addressing significant technological challenges identified in the particular domain.

Unidata's investments in research, development and innovation amount to € 245.099 in 2020 and are broken down as follows:

	2020	2019	2018
Research and Development staff not on projects	137.070	81.901	103.274
Personnel costs for development of R&D projects	24.838	297.198	137.427
Costs of external consultants	58.016	111.990	109.301
Overhead costs for R&D projects	25.175	184.805	148.117
Total	245.099	675.894	498.119

While the release of calls is still uncertain, it is intended to submit 2 R&D projects in 2021 on the following topics:

- **GREEN ECONOMY**: Systems combining IoT networks, BigData, Analytics for the green economy, with particular reference to the issues of optimal use of water resources.
- **E-HEALTH**: Systems combining IoT networks, BigData, Analytics for tele-assistance and support to frail persons.

In these projects, we will continue to cooperate with CNIT and CNR, our established partners in national and European projects.

Regarding the industrialisation of existing R&D projects (particularly the FRAGILI project), the development and production of an innovative platform that will enable clinics and doctors' surgeries to include the provision of *televisita* in their standard range of services are envisaged. The platform services will be provided on top of Unidata's datacenter infrastructure.

4 THE SOCIAL

4.1 SOCIAL IMPACT MANAGEMENT

GRI 102-29

For Unidata, attention to social aspects is one of the main pillars of its sustainable development model.

Social sustainability is considered to be the set of actions aimed at achieving equity between categories of individuals, genders and generations. To this end, it implies a diversity of actions affecting mainly legal, economic and cultural levels.

From a legal perspective, social sustainability is about taking action to assert people's economic, social, political and cultural rights. For this reason, social sustainability finds its first protection in the declarations of human rights.

During the last century, at the international level, the principles of social sustainability were enshrined in the Universal Declaration of Human Rights, adopted in 1948 by the United Nations General Assembly, and at the continental level by the European Convention for the Protection of Human Rights and Fundamental Freedoms (1950), which established the European Court of Human Rights to protect people against human rights violations.

In a national dimension, the fundamental principles of the Italian Constitution, in particular in its first four articles, highlight the need for social sustainability. Also, from the perspective of active policies, the second paragraph of Article 3 of the Constitution states: "*It is the task of the Republic to remove obstacles of an economic and social nature which, by limiting the freedom and equality of citizens, prevent the full development of the human person and the effective participation of all workers in the political, economic and social organisation of the country.*"

Today calls for social sustainability are explicit and detailed in several of the 17 Sustainable Development Goals set out in the UN 2030 Agenda.

In this context, Unidata respects decent working conditions, gender equality, equal and fair pay, and eradicating discrimination. In order to make it possible, safeguards must be applied in a smarter, greener economy based on disseminating and adapting skills and education.

Unidata is involved in the various challenges that have a clear social impact and require a global response to local and national political action. In particular, the society pays attention to:

- the growing inequality between generations, which requires a stronger focus on young people. They are and will be living in a context where opportunities, social, health, economic and environmental resources are diminishing;

- climate change and dwindling resources, which increase forced migration to more developed countries and create a huge demographic imbalance, as well as growing labour and skills shortages in all sectors of the economy;
- territorial disparities, not only between regions and areas in each country but also between different European countries. This phenomenon seriously jeopardises the future development of many territories.

These are just a few of the many complex challenges of the future that Unidata shares with the 2030 Agenda for Sustainable Development and which will have to be tackled head-on.

4.2 SOCIAL AND COMMUNITY RISKS

GRI 102-15

In order to align its operations with the principles of social sustainability, Unidata carried out an analysis of possible risks in the social and community spheres, identifying risk areas to be monitored.

Significant risks to be monitored are discussed below.

1. *Risks related to changes in regulatory regulations*

Regulations in the telecommunications sector, and in particular those relating to fiber-optics, are constantly evolving.

The need for Italy to compete again on the broadband front is pushing institutions to accelerate from a regulatory point of view, in particular by providing simplifications for the laying of fiber-optics.

The new rules, starting with Legislative Decree 33/2016 implementing European Directive 61/2014 "Fiber-Optic Decree," aim, in fact, to facilitate the installation of high-speed electronic communication networks by promoting the shared use of existing physical infrastructure and the use of new, less invasive and costly technologies in the field of excavation.

This orientation is confirmed by the very recent decree-law no. 76 of 2020, which introduced further simplification measures for the deployment of networks. The provision in question declares that companies providing electronic communications networks and services are allowed to carry out the excavation, installation and maintenance of fiber-optic communications networks by simply submitting a certified report of commencement of activities (SCIA) to the competent local administration and the bodies responsible for carrying out controls.

Decree-Law No. 76 refers to the provisions of Decree-Law No. 18 of 2020, which allowed companies providing electronic communications networks and services to carry out any useful initiative aimed at upgrading infrastructure and ensuring the operation of networks and the operability and continuity of services even during the period of the SARS-CoV-2 epidemiological emergency.

The need to meet European targets for broadband and ultra-broadband connections, which require at least 50% of real estate units to be wired, is forcing Italy to invest in the development of fiber-optic infrastructures, transforming new legislation into opportunities rather than risks.

In order to prove the reliability of its services, the company makes use of certifications issued by third parties.

In particular, Unidata has obtained ISO 9001 Certification for architecture quality, ISO 27001:2013 for the information security management system, and has started the process of obtaining ISO 14000 Certification for the environmental management of organisations.

2. Reputational and operational risks due to delays in project execution

The prosperity of companies is no longer based on purely financial parameters but is closely linked to values such as reputation, brand, quality and quantity of intellectual capital, respect for the natural ecosystem and human and social rights.

Reputation is a determining factor in a company's success. Consequently, when certain events occur, the media have an impact that can lead to a deterioration in the company's perception. This reputational damage can lead to a drop in profit volume and brand value. Unidata will be proactive with local communities to identify the most relevant needs to be integrated into structured action plans. Unidata will constantly monitor the implementation of these plans in order to prevent reputational and operational risks.

Unidata intends to adopt an industrial strategy aimed at pursuing growth and expansion objectives to be implemented mainly through:

- increasing local and geographical penetration in markets where it is already operating;
- increasing the customer base;
- the implementation of cross-selling and up-selling policies, both by external lines, through, among other things, the acquisition of operators with activities concentrated in regions other than Lazio, with a view to expanding nationwide and strengthening territorial coverage.

In the implementation of the aforesaid strategy, the Company is exposed to certain risks such as excessively long delays (not in line with the business plan) in obtaining the necessary administrative authorisations from local authorities for the laying of the new fiber-optic network lines, excessively high costs for obtaining such authorisations and, in general, for the implementation of the network projects envisaged in the development plan, and the lack of acquisition opportunities of companies already present on the market.

The occurrence of any of the above circumstances could also jeopardise the outcome of the Company's existing or future investments, resulting in a decrease in the profitability of those compared to what was budgeted or in the loss of the capital invested.

3. Risks related to the collection, storage and processing of personal data

In the performance of its activities, Unidata collects, stores and processes the data of its customers, employees and suppliers, with the obligation to comply with the applicable laws and regulations on the protection of personal data.

Although Unidata has adopted security protocols to avoid such events, the Company is still exposed to the risk of personal data being damaged, lost, stolen, disclosed or processed for purposes other than those authorised by customers, including by unauthorised persons.
Any destruction, damage or loss of customer data, as well as their removal, unauthorised processing or disclosure, also as a result of hacker attacks, would have a negative impact on the Company's business, in financial and equity terms and, with particular reference to Cloud services, in terms of reputation.

4. *Risks related to safety in the workplace*

The company's business involves excavations, the positioning of antennas and cables, contact with electrical cables and other matters that may jeopardise the safety of its employees and collaborators.

Even though Unidata complies with current regulations on safety in the workplace, provides for staff training programmes and adopts special precautions for the performance of the aforementioned activities, accidents could occur in the workplace, even of considerable importance. The occurrence of such events, in addition to the possibility of giving rise to litigation and damage to the company's image, could jeopardise the smooth running of the business with consequent significant repercussions on its economic and financial situation and assets.

4.3 THE ORGANISATIONAL STRUCTURE

GRI 102-8 401-1 403-1 403-2 403-5 405-1

Thanks to the energy and expertise of people, it is possible to manage increasingly complex working methods while maintaining commitments to the market. Progress springs from ideas and co-creation and is nurtured by values such as trust, responsibility, proactivity and innovation.

Major trends call for a new world of work, which responds to future challenges more dynamically and requires a different leadership model. Technological advances offer greater choice and flexibility both in the way activities are carried out, and in the way people are organised and managed.

Skills requirements are changing, and *upskilling* and *reskilling* strategies are becoming increasingly important to enable companies to develop talent and contribute to socially responsible approaches to accompany the transition without leaving anyone behind.

Unidata has clearly defined the set of values it shares and pursues with regards to its human resources, enshrining them in its Code of Ethics.

Among the various values, the principles of respect and protection of the individual, as well as those relating to health and safety at work, are of fundamental importance.

Human resources management policies are based on the enhancement of the personality and professionalism of each individual, in a working environment inspired by the rejection of all forms of discrimination or harassment.

Unidata pays considerable attention to the promotion of equal opportunities, concerning working conditions and opportunities, training, development and professional growth of every worker.

The importance of stable, long-term employment is a fundamental element for the company, both as a motivating force for employees and an indispensable factor in Unidata's growth and economic development.

4.3.1 Staff composition

As of 31 December 2020, the company had 81 employees, of whom 61 were men and 20 were women. The female quota within the structure is therefore around 25%.

Of the total workforce, 77 employees are employed on permanent contracts and four on fixed-term contracts.

Furthermore, 72 employees have a full-time contract compared to the entire staff, while nine employees have a part-time contract.

In addition, 72% of the employees are between 30 and 50 years old, 18% are over 50 years old, and 10% are employees under 30 years old.

Unidata supports and pays the utmost attention to people with psycho-physical problems and all other situations of discomfort. It should be noted that 4 of the employees belong to the so-called protected categories.

4.3.2 Diversity and Equal Opportunities

	Men	Women	Total
Management	6	-	**6**
Board of Directors	7	1	**8**
Board of Auditors	3	2	**5**

Table 10"The composition of the Unidata board"

The organisational composition of the **employees** is as follows:

	2019			2020		
Age	**N. Men**	**N. Women**	**Total**	**N. Men**	**N. Women**	**Total**
	54	18	**72**	61	20	**81**
<30 years	6	-	**6**	8	-	**8**
30-50 years	42	13	**55**	43	15	**58**
>50 years	6	5	**11**	10	5	**15**

Table 11"Diversity in employee composition"

	2019			2020		
	Men	**Women**	**Total**	**Men**	**Women**	**Total**
Average age	40	45	42	40	45	41

Table 12"The average age of Unidata employees"

4.3.3 Employment

In 2020, 13 new employees joined Unidata's workforce, corresponding to an entry rate of 17%, while the number of outgoing employees was 4, corresponding to an exit rate of 5%.

The incoming and outgoing turnover rates are calculated as:

- the ratio between the number of recruitments during the year and the average number of employees between the beginning and the end of the year
- the ratio of the number of resignations/dismissals during the year to the average number of employees between the beginning and the end of the year

Total turnover = (entrants+leavers in the period)/(average staff for the period) = 23,77%.

In 2021 it is planned to hire two mid-junior front-end and back-end SW developers, to integrate and support the current staff in the active R&D projects, in the development and maintenance of the Lorwan Uniorchestra PaaS platforms and IoT applications, in the development of applications/services for e-health and telehealth, and to support the SW development of other Unidata divisions.

4.3.4 Inbound Turnover

age	**<30 years**	**30-50 years**	**>50 years**	**Total**	**% Turnover**
Men	5	4	1	10	**17%**
Women	-	3	-	3	**21%**
Total	**5**	**7**	**1**	**13**	**17%**
% Turnover	**71%**	**13%**	**8%**	**17%**	

Table 13"Incoming Turnover"

4.3.5 Outbound Turnover

	<30 years	**30-50 years**	**>50 years**	**Total**	**% Turnover**
Men	-	3	-	3	**5%**
Women	-	-	1	1	**7%**
Total	**-**	**3**	**1**	**4**	**5%**
% Turnover	**-**	**5%**	**8%**	**5 %**	

Table 14"Outgoing Turnover"

Unidata is committed to providing equal employment opportunities without discrimination based on ethnicity, gender, age, personal and social conditions, and religious and political beliefs to ensure fair and merit-based treatment of its employees. The company ensures that its employees are not subject to any constraints arising from gender differences in their development and training.

4.3.6 Framing and Gender

Type of contract applied (Ccnl)

The employment contract applied to the employees is the National Collective Labour Agreement (CCNL) for the metalworking sector for workers in the private metalworking and plant installation industry, except for the CFO, who is covered by the contract for managers in service sector companies.

		2019			2020		
		Men	**Women**	**Total**	**Men**	**Women**	**Total**
Managers		2	-	**2**	2	-	**2**
Middle-managers		1	-	**1**	1	-	**1**
Employees		**54**	**18**	**72**	**61**	**20**	**81**
	1 level	2	-	**2**	2	-	**2**
	3 level	44	18	**62**	48	20	**68**
	4 level	8	-	**8**	11	-	**11**

Table 15"Breakdown by gender and classification"

		2019				2020			
		<30	**30-50**	**>50**	**Total**	**<30**	**30-50**	**>50**	**Total**
Managers		-	-	2	**2**	-	-	2	**2**
Middle-managers		-	-	1	**1**	-	-	1	**1**
Employees		**6**	**55**	**11**	**72**	**8**	**58**	**15**	**81**
	1 level		1	1	**2**	-	-	2	**2**
	3 level	3	49	10	**62**	5	51	12	**68**
	4 level	3	5	-	**8**	3	7	1	**11**

Table 16"Breakdown by classification and age"

4.3.7 Training and Development

The development, care, growth and wellbeing of its human resources are key points to which Unidata pays considerable attention through continuous training programmes and by adopting a meritocratic remuneration policy.

As part of its corporate Welfare policies, Unidata reserves various initiatives for its employees to ensure a better balance between the professional and the tried and tested spheres, thus improving their quality of life.

Unidata disbursed approximately € 82.000 in production incentives to its employees in 2020. This represents 3,34% of EBIT in the 2019 budget.

As far as the 2021 forecast is concerned, Unidata expects to provide its employees with satisfactory corporate welfare, based on the redistribution of incentives to a wider range of professional figures.

The company will also consider transferring the amounts set aside as severance pay into a mutual investment fund.

Remuneration policies originate from an assessment carried out by company managers and the Human Resources Department based on job responsibilities and internal fairness principles.

4.3.8 Health and Safety at Work

The term 'safety at work' refers to **all measures** taken to **make workplaces healthy** and **safe**. That is, to avoid all the risks associated with any work activity, reduce or eliminate the risk of accidents, and, not least, the occurrence of **occupational diseases**.

Occupational diseases, in particular, are all those pathologies linked to a type of work activity and its exercise. It is an illness that often does not come on suddenly, but **acts progressively and slowly** over time, but in respect of which it is clear that, if the worker had carried out another profession or if this had been carried out in a healthier environment, he would not have fallen ill in this way.

Unidata protects its employees' and collaborators' moral and physical integrity, committing itself to spreading a culture of health and safety in the workplace that makes personnel aware of the risks related to their activities and promotes responsible behaviour.

All the safety measures required by technological evolution are taken to ensure a safe and healthy working environment, in full compliance with current prevention and protection legislation.

The text that unites all the relevant legislation is the Consolidated Law on Safety at Work, also known as Legislative Decree 81/2008.

Among the general measures provided for in the T.U.S. are:

- assessment of all health and safety risks
- elimination of risks or, if not possible, risk reduction in relation to technical knowledge
- replacing risks at source
- limited use of chemical, physical and biological agents in the workplace
- health monitoring of workers
- adequate information and training for workers
- adequate information and training for managers and supervisors
- adequate information and training for workers' safety representatives
- worker participation and consultation
- participation and consultation of safety representatives
- planning of measures considered appropriate to ensure the improvement of the level of security over time, including through the adoption of codes of conduct and good practices.

In particular, the Consolidation Act has introduced the issue of **risk assessment** as "an *absolutely central requirement*" and which "*must cover all risks to the safety and health of workers, including those concerning groups of workers exposed to particular risks."*

Connected to the risk assessment is the **risk assessment document (DVR)**, which must formalise what has been learned about the risk associated with the company and its workers. This document must be dated and must contain:

- the **report** on the risk assessment, specifying the criteria used to assess it, an indication of the prevention and protection measures implemented and the protective equipment used;
- an **indication** of the prevention **and protection measures** implemented and the prevention devices put in place;
- the **programme of measures** to be taken to improve security levels over time, as well as the procedures for implementing the measures to be carried out, together with the roles within the company of those who are to deal with them. These can only be people who have appropriate skills and competence.
- an **indication of the tasks** that may expose workers to **specific risks** and for which professional skills, specific experience, appropriate education and training are required.

In line with the provisions of the Consolidation Act, on 06 June 2015, Unidata drew up the first Assessment Document dealing with the Risks associated with the Cabling and Maintenance of fiber-optic networks already installed in maintenance holes or cabins alongside road networks. This document was revised and updated on 08 April 2021.

The person in charge of the prevention and protection service (RSPP) is Mr. Marco Picierro, while the workers' safety representative (RLS) is Ms. Brigida Bifulco.

The activity of fiber-optic cabling networks consists solely of connecting data cables using fusion splicing machines that are not connected to the electricity network. The operations to be performed by the worker are to cut the cable with scissors, strip it using a hand tool, place it inside the splicing machine and reposition the spliced cable.

However, the activity is considered to be particularly risky because the working environment affects the simplicity of operations.

This activity is mainly carried out on public roads, underground chambers with access to the public road, or outdoor cabins located on pavements.

The work is carried out by a team consisting of two specialised workers, one of whom is a supervisor. The team has a company vehicle (a van) to transport all the equipment needed for the work to be carried out. Inside the van, there are hand tools, optical joints, a fusion splicer, waterproof boxes (moffole) to be used for connections in particularly humid environments, portable ladders, battery-operated screwdrivers and an isopropane alcohol kit for cleaning optical fibers. In addition, the vehicle must carry road signs for marking the road construction site.

As regards the substances used, the use of isopropyl alcohol should be highlighted.

After removing the outer coatings (primary and secondary) of the cable, the exposed glass fiber must be cleaned. It is advisable to use colorless isopropyl alcohol with a purity greater than 98% for this activity, using a lint-free cloth, with due safety precautions to avoid ingestion, spillage, and inhalation.

The main risk factors are related to:

- Working environments;
- Performance of work activities;
- Use and operation of machines and equipment;

The main risks specific to the activity can be summarised as follows:

- Interference with road works
- Signposting of roadworks
- Fall from height
- Polluted or confined environments

Analysis of risks related to working environments and prevention measures

The cabling and maintenance of the fiber-optic network are mainly carried out on public roads, in underground chambers with access to the public road, along the carriageway or on pavements, or in outdoor cabins located on pavements.

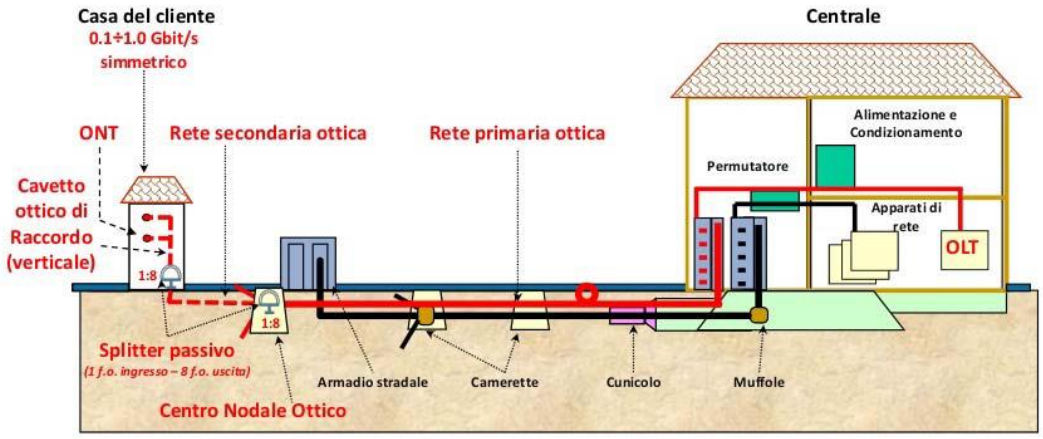

Figure 17"Illustration of the connection between the control centre and the customer's house"

Cabling activities take place mainly in the following locations:

1. Road cabinet
2. Road well
3. Underground data cabins
4. Other places to be assessed on a case-by-case basis

Any activity carried out on a public road with vehicles is a **road construction site**, so it is essential to assess the risks associated with the **interference of work** with vehicle traffic and pedestrians.

Main risk factors

- Running over workers by vehicles;
- Fall of pedestrians in the shaft or chamber

Prevention measures

Signposting of the road construction site according to:

- D. Legislative Decree 81/08 and subsequent amendments - Title V
- Interministerial Decree of 4 March 2013 - General safety criteria relating to the procedures for revising, supplementing and affixing road signs intended for work activities carried out in the presence of vehicle traffic
- Ministerial Decree of 10 July 2002 - Technical specifications concerning the signalling schemes, differentiated by category of road, to be adopted for temporary signalling
- D. Lgs 30 April 1992, n. 285 e s.m.i. (DL 192/14) - New Highway Code 2015 Edition

When work is carried out in **underground chambers**, risks related to suspected polluted or confined environments must be assessed.

Underground data cabins known as 'small rooms' are generally small (4/5 sq m) and underground, with only one access through a maintenance hole; they must therefore be considered a '**suspected polluted or confined environment**.'

The walking surface in the room is located at a depth of more than 2 m from the road surface; therefore, workers are exposed to the risk of **falling from a height**.

The data network backbones consisting of twisted pairs of telephone wires and fiber-optics converge in the rooms; there are no high or medium voltage electrical installations.

Main risk factors

- asphyxia
- intoxication
- workers falling while accessing the room

Prevention measures

- Personal Protective Equipment such as Respiratory Protective Equipment
- Use of appropriate access equipment
- Emergency and rescue procedures
- Preliminary measures and precautions
- Information, education, training and health suitability for the specific task
- Signposting

Analysis of risks related to work activities

The operations carried out by Unidata spa require specialised personnel who can make splices and connections on fiber-optic cables, using specialised equipment of considerable technological novelty.

Work activities include the following phases:

1. Preparing the means of transport
2. Road journey towards the destination
3. Signposting of road works
4. Street cabinet intervention
5. Roadside maintenance hole intervention
6. Intervention in the data room

7. Dismantling the road construction site
8. Road journey back

Main risk factors

- Manual handling of loads
- Level fall

Prevention measures

- Marking and delimitation of fixed construction sites
- The working environment must be efficiently maintained while the work is being carried out
- Personal Protective Equipment
- Information, education, training
- Correct posture

Unidata has updated its Biological Risk Assessment Document to comply with the provisions of the "*Shared protocol for the regulation of measures to combat and contain the spread of the Covid-19 virus in the workplace*" of 24 April 2020.

The assessment was conducted to identify protective measures to prevent and protect against possible infection with the **SARS-CoV-2** virus.

Through the application of the INTEGRATED EVALUATION METHODOLOGY developed by INAIL and reported in the "Technical document on the possible remodelling of measures to contain SARS-CoV-2 infection in the workplace and prevention strategies" (INAIL, 2020), the risk levels for company workers were assessed and classified according to the tasks carried out.

MANSION	Aggregation class	Risk class
Worker for installation of telephone and data transmission systems	2	LOW
VDT/Carrier employee	3	LOW
Warehouse logistics worker	3	LOW
Display clerk	3	LOW

Number of Hours of Health and Safety Training for Workers

2019	2020
138 hours	52 hours

Table 17'Health and safety training hours'

During the ongoing **SARS-CoV-2** emergency and given the operational difficulties caused by the containment measures, Unidata, like most companies, was unable to provide a substantial amount of hours for refresher and training.

As shown in the table above, there is a significant reduction in training hours for 2020 compared to 2019. Occupational health and safety training courses are one of the cornerstones of any risk prevention strategy. It is precisely for this reason that the company, despite various limitations, has managed to provide this training, albeit in a very limited manner, in an electronic/digital manner.

Accidents at work

An accident at work, i.e., an **adverse event that causes damage to a worker's psycho-physical integrity** during the normal course of employment, is mitigated by the Company to regulate the occupational risk, i.e., the risk related to the work activity.

Unidata protects the physical integrity of those who carry out any activity for the company. As a result, no accidents of any kind occurred in 2019-2020.

4.4 THE SUPPLY CHAIN

GRI 102-9 102-42 414-1

The process of selecting Suppliers or Systems is guided by the overriding principles of transparency, economic efficiency and compliance with applicable regulations.

The company requires its business partners to submit certifications on quality management, health and safety at work and environmental impacts. To successfully complete the accreditation process, all suppliers must sign specific clauses relating to environmental and social responsibility issues, including compliance with applicable legislation, possession of the required authorisations and the adoption of principles for the protection of workers' rights, with particular attention to the protection of the fundamental rights of workers enshrined at international level.

Concerning the procurement procedures for the materials needed to carry out the project, Unidata will develop an interactive platform for supply chain management to optimise the supply chain process:

- acquisition of new suppliers
- assessment of new and existing suppliers' requirements
- monitoring the documentation needed to complete orders
- procurement process

To further strengthen its commitment to Corporate Social Responsibility, Unidata has set as one of its objectives for the near future, that of qualifying and subsequently assessing suppliers not only by checking technical, economic and organisational quality requirements but also by analysing compliance with environmental sustainability criteria.

The aim will be to create a "Sustainable Vendor Rating" system, i.e., a management process aimed at measuring the performance of suppliers and encouraging improvements in supply with respect to environmental and social assessment parameters while maintaining the traditional ones at the same level.

In this context, the risks relating to the Supply Chain were also analysed. As a result, the following risks are the most significant ones concerning the activity carried out:

1. *Risks associated with join liability with respect to procurement contracts*

The procedures for assigning work to Systems will be managed according to the guidelines for tenders. In particular, the procurement contracts that Unidata will stipulate with individual suppliers will be based on a Framework Agreement specifically designed and verified by the company's lawyers.

This agreement provides for the conclusion of various documents for the development of the individual phases of the Contract, which shall be considered an integral part thereof, namely:

1. Framework Contract
2. Fostering Agreement
3. Letters of Assignment

The Framework Agreement provides for the exchange between the parties of the technical-administrative documentation relating to the specific contract, according to the provisions contained in Legislative Decree 81/2008 and subsequent amendments and additions, Legislative Decree 163/2006 and other legislation applicable to the relations in question. The following is a non-exhaustive list of such documentation:

1) Chamber of Commerce certificate of registration with the Chamber of Commerce;
2) Self-declaration of preparation of the Risk Assessment Document referred to in Article 17(1)(a) or Article 96(2) of D.gls 81/2008;
3) Graphic and design drawings;
4) Declaration that they are not subject to suspension or prohibition measures under Article 14 of this legislative decree (Legislative Decree 81/2008, Annex XVII paragraph 1 letter d) duration one year;
5) Declaration of the average annual workforce, broken down by qualification, and declaration of the collective agreement concluded by the most representative trade unions applied to the workers;
6) Valid insurance policy with receipt;
7) Operational Safety Plan (OSP) drawn up in accordance with Legislative Decree 81/2008, Annex XVI;
8) UNILAV forms + health certificates + training certificates for workers employed on-site;
9) List of personnel who will carry out the work;
10) Certificates and appointments of RLS, RSPP, Medical Officer, Emergency Officer and Person in charge;
11) Outcome of noise assessment;
12) LUL (Libro Unico Lavoratori): i.e., the payslips for the last three months, of the employees on the staff list and all the safety and prevention officers, etc. if they are not on the list, taking

care not to disclose sensitive data, i.e., the various amounts in euros on the payslips and also the amount of the hourly wage. On the other hand, the following must be visible: the date of recruitment, the type of contract (fixed-term or open-ended), the qualification and level, the hours worked (attendance) in the month;

13) Certification valid for six months, signed by the Board of Auditors, if any, or by a professional registered with the ODCEC, concerning the regularity of the payment of withholding taxes to its employees;
14) Contractor's offer;
15) Declaration by the principal on the VAT rate to be applied to the contracted workers;
16) Executive technical, structural and plant engineering drawings (except for additions which the Customer undertakes to provide before the date of delivery of the works)
17) Reconnaissance Interference Risk Assessment Document (DUVRI).
18) Comprehensive safety and coordination plan with estimated safety costs and the technical file containing useful information for the prevention of workers during the execution of the works;

The conclusion of the Framework Agreement also implies the acceptance by the Suppliers of the Companies' Code of Ethics.

In this sense, Unidata undertakes to promote, within the scope of its procurement activities, compliance with contractual conditions consistent with its environmental policy and with the ethical principles contained in the Code of Ethics.

2. *Risks of incurring penalties, economic and financial losses as a result of partial or total interruption of relations with specific suppliers or contractors*

Unidata selects its suppliers from those on its 'Vendor List.'

For all suppliers interfacing with the project, an accreditation and monitoring procedure is foreseen over time, which will mitigate the risk of purchasing goods and services from unreliable suppliers or those not meeting the legal requirements.

The suppliers shall be previously verified, both concerning their own economic-financial situation and with regard to the absence of prejudicial circumstances for the Company. They shall provide and keep updated the specific documents requested during the accreditation phase. The risk of incurring sanctions, economic and financial losses is mitigated by the wide availability of suppliers belonging to the same category and therefore easily replaceable in the case of sudden or scheduled interruption of the supply.

4.5 CUSTOMER SATISFACTION

GRI 102-29

Customer Care as a fundamental indicator of Unidata's business performance

Customer Satisfaction refers to the customer's perception that a company's offer system has met or exceeded their expectations regarding the set of benefits and costs relevant to them when purchasing and using that offer system.

Customer satisfaction is the primary aim of Unidata as a strongly market-oriented company, whose efforts tend to develop a continuous, stable and lasting relationship with customers through searching for satisfaction of their needs, desires, and expectations. Therefore, the basis of customer satisfaction is the creation of value for customers, i.e., the satisfaction of their needs and requirements effectively and efficiently.

Unidata is well aware that customer satisfaction leads to **customer loyalty**. Customer loyalty can be seen as a form of long-term investment that helps to increase positive word-of-mouth and, consequently, improve brand image.

Customer satisfaction and loyalty have important positive effects, as the satisfied customer:

- hardly withdraw from the supply contract, ensuring that the company has a greater flow of sales over time;
- tends to increase and differentiate their purchases, also signing contracts for additional services;
- tends to be willing to pay a higher activation price for services or tends to apply less pressure on discounts.

Unidata considers the well-being of its customers to be the driving force behind its growth. In 2020, the company worked to make its customer contact procedures even easier and more efficient. In fact, it has improved its customer service by providing a single toll-free number, through which you can contact the different sectors of Unidata from any national landline free of charge.

As already mentioned, the company operates by providing a high-quality service, and the quality indicators demonstrate this for the year 2020;

It can also be seen that the company's economic growth is reflected in the expansion of its customer base.

	2019	**2020**	**% change**
Business customers	1.685	1.862	**+ 10,5%**
Retail customers	5.377	7.603	**+ 41,4%**
Wholesalers	13	13	-
TOTAL	**7.075**	**9.478**	

Table 18"Composition of Unidata's customer portfolio"

Since 2020, Unidata has opted to increase the number of contracts signed with residential customers against IRU contracts. The excellent result is evidenced by the 41,4% increase in the number of private contracts.

The company implements a detailed pricing and loyalty policy to counteract the *churn rate* trend and acquire customers from other competitors. Furthermore, to respond to the pressure of competition from other operators and the ever-increasing demand for bandwidth from the market, the company has developed new ultra-wideband (fiber-optic) offers, increasing the transmission capacity offered.

This represents an important change of direction for the company, which is no longer focused solely on installing the fiber-optic line but also on the direct marketing of the product.

The new business perspective is, in fact, oriented towards the expansion of the FTTH fiber-optic network, i.e., the network that allows each home to be reached directly.

In the highly competitive telecommunications market and in times of deep crisis like the ones we are currently experiencing, a high level of customer satisfaction can make the real difference for Unidata; constantly monitoring the level of customer satisfaction and acting daily to improve it has become one of the strategic objectives of Unidata's marketing department.

To this end, Unidata has decided to set itself the short-term objective of analysing and measuring customer satisfaction, in line with the requirements of ISO 9001:2015.

ISO 9001 defines the requirements of a Quality Management System for an organisation. ISO 9001 is the reference standard for an organisation to plan, implement, monitor, and improve operational and support processes, designing and implementing the quality management system to achieve its objectives. The customer and customer satisfaction are at the heart of this system; every activity, application and monitoring of activities/processes aims to ensure maximum customer satisfaction.

The measurement and monitoring of customer satisfaction will be linked to both the relationship of customers with the company and the expectations they have of the service they use.

Unidata will thus make its service more effective and efficient and strengthen its **customer loyalty.**

To achieve this objective, it will be necessary to identify the most appropriate target group to assess customer satisfaction. In this sense, the sample chosen must be as representative as possible, i.e., it must be capable of expressing the entire community. Therefore, it will be important to consider certain characteristics to correctly sample one's clientele, such as socio-demographic (age group, profession, gender, nationality), geographical-territorial (origin, family background), and temporal characteristics.

The method that will be applied will be based on the **evaluation of the difference between customers' expectations and perceptions**. In particular, customer satisfaction will be measured as the *"function of the discrepancies between the expected performance or characteristics of the ideal product and those perceived in the actual product."*

The main tool for measuring perceived quality will be a **questionnaire**, which will be submitted at regular intervals to customers to assess the services provided.

Unidata intends to implement an effective Customer Service Management system as early as the second half of 2021.

Appendix 1 - GRI Standards

GRI 102-55

The following table presents the sustainability issues considered material for Unidata, related to the topics defined by the *"GRI Sustainability Reporting Standards,"* reported within the DNF.

GRI-Standards		Chapters	Par
GRI 102: General Standard Disclosure			
ORGANISATION PROFILE			
102-1	Name of organisation	THE COMPANY AND GOVERNANCE	2.1
102-2	Activities, trademarks, goods and services	THE COMPANY AND GOVERNANCE	2.1
102-3	Location of headquarters	THE COMPANY AND GOVERNANCE	2.1
102-4	Location of operations	THE COMPANY AND GOVERNANCE	2.1
102-5	Proprietary set-up	THE COMPANY AND GOVERNANCE	2.1-2.3
102-6	Markets served	THE COMPANY AND GOVERNANCE	2.1
102-7	Size of the organisation	THE COMPANY AND GOVERNANCE	2.1-2.3
102-8	Information on employees and other workers	THE SOCIAL	4.3
102-9	Description of the supply chain	THE SOCIAL	4.4
102-10	Significant changes in the organisation and its supply chain	THE COMPANY AND GOVERNANCE	2.1
		METHODOLOGICAL PREMISE	
102-11	Precautionary principle or approach	THE COMPANY AND GOVERNANCE	2.4
102-12	External initiatives	THE COMPANY AND GOVERNANCE	2.11
		ENVIRONMENT	3.6
STRATEGY			
102-14	Statement from the main decision-maker	LETTER TO STAKEHOLDERS	
		THE COMPANY AND GOVERNANCE	2.4
102-15	Key impacts, risks and opportunities	ENVIRONMENT	3.5
		THE SOCIAL	4.2
ETHICS AND INTEGRITY			
102-16	Values, principles, standards and norms of behaviour	SUSTAINABILITY	1.1

		THE COMPANY AND GOVERNANCE	2.5

GOVERNANCE			
102-18	Governance structure	THE COMPANY AND GOVERNANCE	2.3
102-21	Stakeholder consultation on economic, environmental and social issues	LETTER TO STAKEHOLDERS	
		SUSTAINABILITY	1.2
102-22	Composition of the highest governing body and its committees	THE COMPANY AND GOVERNANCE	2.3
102-23	Presidency of the highest governing body	THE COMPANY AND GOVERNANCE	2.4
102-25	Conflict of interest	THE COMPANY AND GOVERNANCE	2.4
102-29	Identification and management of economic, environmental and social impacts	SUSTAINABILITY	1.4
		THE COMPANY AND GOVERNANCE	2.4
		THE COMPANY AND GOVERNANCE	2.6-2.7-2.8-2.11
		ENVIRONMENT	3.1-3.4-3.6
		THE SOCIAL	4.1-4.5
102-31	Review of economic, environmental and social issues	METHODOLOGICAL PREMISE	
102-32	Indicate which committee or position reviews and approves the sustainability report	METHODOLOGICAL PREMISE	

STAKEHOLDER ENGAGEMENT			
102-40	Group stakeholders	SUSTAINABILITY	1.2
102-42	Stakeholder identification and selection process	THE SOCIAL	4.4
102-43	Approach to stakeholder engagement	SUSTAINABILITY	1.4
102-44	Issues arising from stakeholder engagement	SUSTAINABILITY	1.4

REPORTING PROCESS			
102-46	Definition of the contents of the sustainability report and limits related to the themes	METHODOLOGICAL PREMISE	
		SUSTAINABILITY	1.2
102-47	List of material topics	SUSTAINABILITY	1.4
102-50	Reported period	METHODOLOGICAL PREMISE	
102-52	Reporting cycle of reporting	METHODOLOGICAL PREMISE	
		LETTER TO STAKEHOLDERS	
102-54	GRI Standard Compliance Statement	METHODOLOGICAL PREMISE	

102-55	GRI Index	APPENDIX GRI STANDARDS	

GRI 200: Specific Standard Disclosures - Economic Category			
ECONOMIC PERFORMANCE *GRI 201: Economic performance*			
201-1	Direct economic value generated and distributed	THE COMPANY AND GOVERNANCE	2.6
INDIRECT ECONOMIC IMPACTS *GRI 203: Indirect economic impacts*			
203-1	Development and impact of investments in infrastructure and services provided	THE COMPANY AND GOVERNANCE	2.7-2.8-2.9-2.11
ANTI-CORRUPTION *GRI 205: Anti-corruption*			
205-2	Communication and training on anti-corruption policies and procedures	*During the year 2020, there were no legal actions for anti-competitive behaviour, antitrust and single-policy practices.*	
ANTI-COMPETITIVE BEHAVIOUR *GRI 206: Anti-competitive behaviour*			
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopolistic practices	*During the year 2020, there were no legal actions for anti-competitive behaviour, antitrust and single-policy practices.*	
GRI 300: Specific Standard Disclosures - Environmental category			
ENERGY *GRI 302: Energy*			
302-1	Energy consumed within the organisation	ENVIRONMENT	3.4
302-2	Energy consumed outside the organisation	ENVIRONMENT	3.4
302-3	Energy intensity	ENVIRONMENT	3.4
302-4	Reducing energy consumption	ENVIRONMENT	3.4
EMISSIONS *GRI 305: Emissions*			

305-1	Direct greenhouse gas emissions (Scope 1)	ENVIRONMENT	3.4
305-2	Indirect greenhouse gas emissions (Scope 2)	ENVIRONMENT	3.4

ENVIRONMENTAL ASSESSMENT OF SUPPLIERS
GRI 308: Environmental assessment of suppliers

308-1	New suppliers assessed using environmental criteria	ENVIRONMENT	3.3-3.4
		THE COMPANY	2.2

GRI 400: Specific Standard Disclosures - Social category

EMPLOYMENT
GRI 401: Employment

401-1	New recruitment and turnover	THE SOCIAL	4.3

HEALTH AND SAFETY OF WORKERS
GRI 403: Occupational Health and Safety

403-1	Worker representation in formal health and safety contexts	THE SOCIAL	4.3
403-2	Type of accident and rate of accidents at work, sickness, lost days, absenteeism and the total number of deaths	THE SOCIAL	4.3
403-5	Worker training on health and safety at work	THE SOCIAL	4.3

DIVERSITY AND EQUAL OPPORTUNITIES
GRI 405: Diversitỳ and Equal Opportunitỳ

405-1	Diversity of governing bodies and employees	THE SOCIAL	4.3
		THE COMPANY	2.3

NON-DISCRIMINATION
GRI 406: Non-discrimination

406-1	Incidents of discrimination and corrective action taken	*During the year 2020, there were no incidents of discrimination within the company.*

SOCIAL EVALUATION OF SUPPLIERS
GRI 414: Assessment of suppliers according to social criteria

414-1	New suppliers assessed using social criteria	THE SOCIAL	4.4

CUSTOMER PRIVACY
GRI 418: Customer privacy

418-1	Documented complaints about privacy breaches and loss of customer data	*During the year 2020, there were no complaints about breaches of privacy.*

SOCIO-ECONOMIC COMPLIANCE *GRI 419: Socio-economic Compliance*		
419-1	Non-compliance with social and economic laws and regulations	*During the year 2020, there were no cases of non-compliancè and significant penalties concerning the violation of laws and regulations in the economic and social spheres.*

Appendix 2 Index Tables and Figures

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