

Sustainability Policy

























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No.1 Italian portal





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Introduction

The Italiaonline Group includes Italiaonline S.p.A. and its subsidiaries (hereinafter the "Group", "Italiaonline" or "IOL"); it puts ethical principles at the centre of its business activities, fully understanding that only with such ethics can a business pathway aimed at creating value for both shareholders and the whole reference community be constructed, made up of staff, users, customers, suppliers, trading partners and the public administration.

The Italiaonline Group has put a responsible industrial and commercial approach in place from an economic and ethical point of view, thereby generating sustainable value and growth, but also implements good environmental practices at Group level to minimize the impact on all areas in which it operates, supporting a responsible business culture and equal opportunities.

Italiaonline considers sustainability as the set of goals to be achieved through continuous process improvement aimed at strengthening the company's economic, environmental and social performance and reputation with its stakeholders. In compliance with fundamental principles, the Group focuses its commitment in order to adopt tools and practices that protect rights and create shared value in the following areas in which the Group operates that characterize the management of its activities:

- Respect for the environment;
- Management of human resources and diversity;
 - Respect for human rights;
 - Health and safety;
- Fight against corruption;
- Supply chain;
- Impact on the community.

As the leading Italian Internet company, Italiaonline is committed to building relationships based on loyalty, honesty and integrity and which clearly demonstrate transparency for all stakeholders. Moreover, in its role as the leading Italian digital reality, Italiaonline aims to promote the digital evolution of national SMEs, encouraging the development and dissemination of environmentally friendly technologies. In particular, the Group's sustainability model applies to all its business processes and is focused on innovation, excellence and the achievement of long-term objectives, including through a risk assessment and management system that contributes to their prevention or mitigation.

In order to play an active role in supporting the transition to a more digital and sustainable economy and society, the Group envisages the possibility of setting short, medium and long-term objectives, in line with this Policy, aimed at creating value for Italiaonline personnel and the community and reducing the direct and indirect environmental impact deriving from its activities.

As defined in the Group's Code of Ethics, every activity is not only carried out in compliance with the law, but also within a framework of fair competition and in good faith, respecting the legitimate interests of customers, staff, shareholders, commercial and financial partners and the community in which the company operates.

This Policy has been drafted in line with the principles defined by the Code of Ethics and with the values that guide the daily work of Italiaonline: passion, identity, dynamism, tradition, experience and creativity.

The document applies to all Group companies, its Directors, members of its Corporate Bodies, staff and agents, contractors, suppliers and business partners, as well as all those who have relations with the Group Companies either directly or indirectly, permanently or temporarily.

Moreover, all the parties acting on behalf of Italiaonline must adhere to the principles and values of the Code of Ethics and of this Policy, as well as the Organization and Management Model as per Italian Legislative Decree 231/01 and all other procedures and guidelines defined at local and Group level.

The Board of Directors approved this Policy on 19 March 2019 and is responsible for its application, its periodic updating in line with the Group's priorities and with pre-set objectives.

This Policy is communicated to all internal and external stakeholders that request it and is publicly available within the Group's website.

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Adhesion to the International Objectives (SDGs)

In order to guarantee responsible operations which are also in line with the best international practices, the Group takes inspiration from the Global Compact, the initiative promoted by the United Nations for corporate citizenship and sustainability. Italiaonline shares the core values of the ten fundamental principles identified by the UN relating to human rights, work standards, environmental protection and the fight against corruption to contribute to a new phase of globalization characterized by sustainability, international cooperation and partnerships in a multi-stakeholder perspective.

Moreover, the Italiaonline Group is committed to contributing to the 17 Sustainable Development Goals (SDGs) set out at the UN General Assembly of 25 September 2015. These objectives indicate the global priorities to be achieved by the year 2030 and define an integrated action plan for people, the planet, prosperity and peace.

Italiaonline contributes in its industrial activities and work through a concrete internal commitment that involves all the significant functions of each of the Group companies, each making its own contribution with particular reference to the following SDGs:

- SDG 4: Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all;
- SDG 5: Achieve gender equality and empowerment (increased strength, selfesteem and awareness) of all women and girls;
- SDG 12: Ensure sustainable consumption and production patterns;
- SDG 9: Building resilient infrastructure, promoting sustainable and inclusive industrialisation and fostering innovation;
- SDG 8: Promote inclusive and sustainable economic growth, employment and decent work for all;
- SDG 13: Take urgent action to combat climate change and its impacts.

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The most loved email in Italy



The Governance of Sustainability at Italiaonline

In the exercise of its powers and responsibilities, the Board has the support of internally established committees that carry out a proactive and consultative role. In particular, the Board of Directors has established an internal Audit, Risk and Sustainability Committee composed of independent directors, which has the task of supporting the Board through adequate preliminary investigations, using assessments and decisions concerning the management of risks deriving from known and harmful facts. In addition, with the Board of Directors' resolution of 27 April 2018, the Audit, Risk and Sustainability Committee was also assigned support functions for the powers given to the Board in relation to the annual non-financial statement pursuant to Italian Legislative Decree 254/2016.

In order to implement an effective tool for monitoring and managing risks, the Group has adopted an Enterprise Risk Management (ERM) process aimed at identifying, assessing and monitoring the main business risks.

ERM is a process of self-risk assessment enacted by Management, with the support of the Audit & Compliance Department, aimed to identify risk events that can affect the achievement of business objectives, providing the Board and Management with useful elements for the definition of operational and organizational Group strategies and, lastly, providing adequate controls efficiently defined and designed to ensure the achievement of corporate objectives.

With this in mind, a web-based application has been developed to collate, manage and consolidate information. The annual process coordinated by the Internal Audit and Compliance Department adopts self-assessment across the various departments to identify the key activities and controls that can reduce the emergence of identified risks and/or mitigate their impact.

Consistently with international best practices, and in particular, the CO.S.O Model¹ of 2017, a review of the risk portfolio was carried out with the application of an integrated classification approach, including the risk of non-reliability of non-financial data and information among the macro risk categories (according to Italian Legislative Decree 254/2016).

The goals Italiaonline has set itself in order to act more responsibly include the addition of so-called ESG risks (Environmental, Social and Governance) within the Enterprise Risk Model in order to evaluate risky elements relating to sustainability. The goal is to be performing and create long-term value for all stakeholders by considering environmental, social and governance issues.

¹ Acronym of the Committee of Sponsoring Organizations of the Treadway Commission: a standard created in 1984, with the latest version reviewed in May 2013. It is a set of internationally recognised best practices, used to manage Internal Controls and Corporate Governance.



When news is trendy



Community Impact

The Italiaonline Group works daily to create social value in people and communities through the provision of quality information and multimedia content, the promotion of innovation and change, its widespread presence throughout the country and the creation of projects with a high social impact.

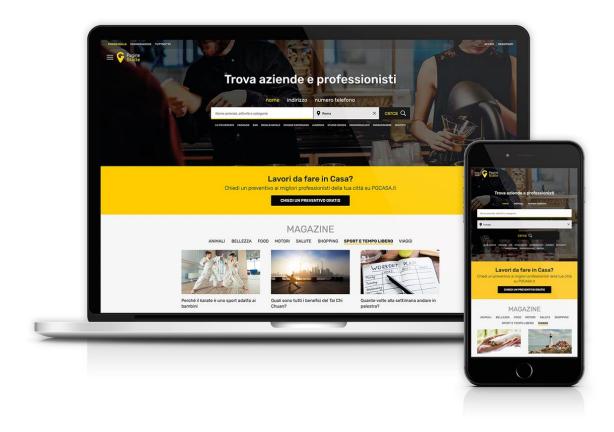
As the leading Internet company in the country, the Group's founding mission is to support Italian businesses in their digital growth.

Through its constant commitment to supporting the Public Administration, Italiaonline walks hand in hand with citizens through a range of services and products that improve the daily activities and digital innovation of the community, from north to south, leveraging its unique presence in Italy.

The goals Italiaonline has set itself in order to act more responsibly include a willingness to be a strategic ally of Italian companies, become a catalyst for change and a reference point for start-ups and companies in social and environmental terms, in order to accompany the same along the path of responsible growth within the national and international economy.



Everything you need, always



Respect for the Environment

Although there are no significant environmental risks associated with the Group's operations, the same is committed to operating in a manner that is protective of the environment according to the principles of sustainable development. As described in its Code of Ethics, each Group company is committed to complying with current environmental regulations, operating in a manner that ensures environmental protection and prevents pollution through good working practices that promote:

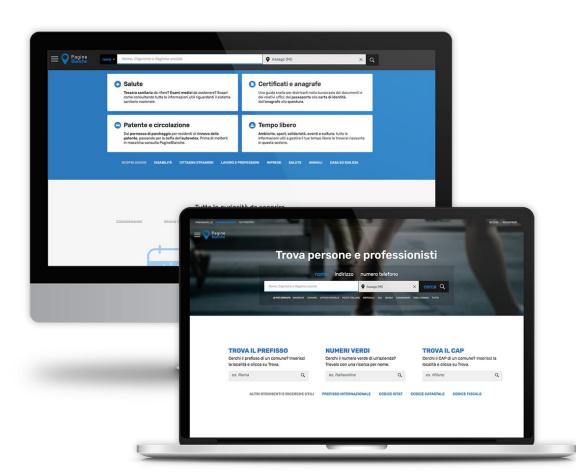
- virtuous behaviour of all staff;
- promotion of procurement policies which are sensitive to environmental issues, with particular reference to the purchase of work tools and equipment that have a low environmental impact;
- supply from renewable energy resources;
- digitization and reducing paper consumption;
- reduced waste production.

The Group is also committed to evaluating and monitoring its environmental impact through constant monitoring activities, adapting its strategies to achieve continuous improvement.

The goals Italiaonline has set itself in order to act more responsibly include, but are not limited to: increasing the use of green energy produced from renewable sources, using recycled and/or eco-friendly raw materials for the production of telephone directories, involve staff in territory requalification activities.



10 million subscribers



Management of Human Resources

For Italiaonline, effective and sustainable management that values employees is a strategic pillar for the success of its business. In order to strengthen and spread this culture through the various corporate policies and the Code of Ethics, the Group informs its stakeholders of its commitment to protect the welfare of the people working in the name and on behalf of IOL.

The Group works with constant respect for the individual person, protecting gender diversity and equal opportunities. In particular, the Code of Ethics makes specific reference to mental and physical respect for workers and the commitment of all to eliminate any form of ethnic, religious, cultural and gender discrimination.

As with any other rule of the Code of Ethics, the violation of these principles is a significant violation against the Model 231 and is a prerequisite for the application of sanctions.

Furthermore, in order to keep all the people within the Group involved in these issues, Italiaonline is committed to ensuring that its relevant organizational and managerial information is constantly updated and provided via the company intranet.

Italiaonline works daily to reach its goal of creating relationships with staff and partners founded on loyalty and able to create a working climate based on human and professional support in order to keep motivation high.

Serving as protection of the same, a specific whistleblowing email inbox was created for reporting any behaviours not complying with the Code of Ethics, as well as meritorious behaviour.

The goals Italiaonline has set itself in order to act more responsibly include, but are not limited to: staff involvement for the continuous improvement of the company climate, and planning special internal moments for sharing corporate know-how, virtuous examples and good practices for working while respecting the environment and the workforce.

Respect for Human Rights

The management of Italiaonline staff is always carried out with respect for human rights, diversity and equal opportunities for all employees, always rejecting any form of discrimination. To ensure this, the Group companies are committed to both continually applying the principles contained in the Group's Code of Ethics, and complying with the provisions established within the National Collective Labour Agreements.

The competent functions must always consider the valorisation of staff in their selection, recruitment, training, remuneration and management, without any form of discrimination related to gender, sexual orientation, religion and political ideologies. All decisions made in relation to the management and development of human resources, also for access to different roles or tasks, are based on considerations in terms of merit and/or the correspondence of candidates' profiles with the expected profiles.

In order to raise employee awareness on these issues, the Group promotes social awareness initiatives to prevent and combat all forms of verbal and physical violence, actively involving all staff.

The goals Italiaonline has set itself in order to act more responsibly include seeking to clearly and transparently communicate the Group's core values both internally and externally, including the fair and respectful treatment of all staff.

Health and Safety

The Group's attention to the health and safety of workers is a core value for the safe and efficient management of staff.

As also described in the Code of Ethics, the Group is committed to providing a work environment which complies with the current rules on health and safety by promoting responsible behaviour and preserving, through monitoring, the management and prevention of risks related to the performance of professional activities, the health and safety of all staff and associates, conforming to the best national and international practices. Moreover, the Group undertakes to spread and consolidate a culture of safety in its staff, its customers and third parties in general, developing awareness of the risks associated with their activities and promoting the responsible behaviour of all parties concerned.

Italiaonline has defined a health and safety policy to protect all internal and external people involved in its business activities, envisaging the following:

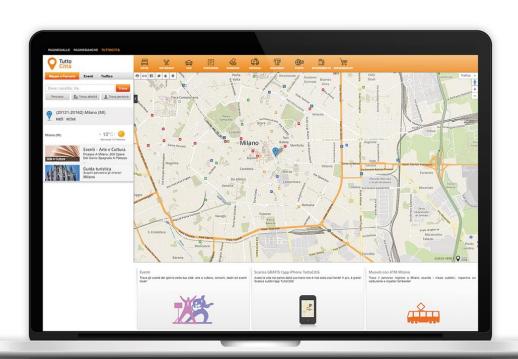
- providing information, education and training on the risks related to work activities;
- risk prevention and assessment;
- monitoring through the use of specific performance indicators.

For more details, please refer to Group's Health and Safety Policy.

The goals Italiaonline has set itself in order to act more responsibly include spreading, internally and to all supply chain partners, the health and safety culture in the workplace in order to make the entire supply chain effective and efficient.



All roads lead here



Fight Against Corruption

In order to prevent any incident that can constitute any risk of committing corruption offences, Italiaonline approved the Code of Ethics and the Organization and Management Model as per Italian Legislative Decree 231/2001.

As envisaged by the Code of Ethics, the Italiaonline Group is guided by the principles of legality, loyalty, fairness, transparency and efficiency in carrying out its business relations.

The staff and associates of the Italiaonline Group must use correct behaviours in carrying out their work for the Group, especially in relations with the Public Administration, regardless of market competition or the importance of the business discussed. In order to strengthen the culture of legality, the Group companies define a training plan annually for the entire workforce, while also ensuring the identification of employees as "representatives" for issues related to Italian Legislative Decree 231/01.

To determine the bribery risk level through Internal Audits, the Group conducts regular and specific anti-corruption audits.

The goals Italiaonline has set itself in order to act more responsibly include spreading positive practices on the importance of legality and transparency in work relations.



Tailor-made home service



Supply Chain

As stated in the Code of Ethics, the Company pays attention to its relations with suppliers, which must be marked by the greatest competitive advantage, the granting of equal opportunities for all involved, loyalty and impartiality.

The Group requires that its suppliers and outside workers comply with its behavioural principles, considering this aspect of fundamental importance for the creation or continuation of a business relationship. Every supplier, business partner or independent contractor must be informed of the Code and the relative commitments.

Italiaonline has specifically inserted clauses in its contracts signed with suppliers and business partners which concern the issue of joint liability of the client/contractor with respect to the contributions and salary obligations thereof. The general objective of managing risks deriving from relationships with suppliers is the achievement of a network of suppliers and solid partners that is devoid of risks and/or critical aspects from a labour law perspective.

The goals Italiaonline has set itself in order to act more responsibly include preferring suppliers and business partners who are particularly sensitive to social and environmental issues, with particular reference to the values that the Italiaonline Group pursues and describes in this Policy.

Supporting businesses

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