

Sustainability Policy

Approved by the Company Board of Directors on 16/12/2022

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Foreword

At Tinexta we are aware of the environmental, social and economic effects of all our activities. We want our actions to have a positive effect on people and the planet and have therefore chosen to make sustainability one of the Group's key drivers. Both our direct activities and the services we provide our customers must contribute to this goal.

Since we were founded, we have sought to support innovation in the economic fabric of the countries where we operate through digitisation. An original calling which has now been transformed into a combination with great potential: in fact, technological innovation and sustainability must go hand in hand if we want to build a responsible future for the generations of tomorrow and the planet we call home. Sustainability also means considering the planet and its resources as a loan from the future generations; a loan in which we are responsible for everything we do.

Our Sustainability Policy is based on this premise; a commitment we want to communicate to all our stakeholders, both internal and external. We intend to apply this Policy to the entire Tinexta Group without distinction, in every country and at all levels of the organisation, and we are committed to keeping it up-to-date and aligned with the corporate strategy.

The Policy is consistent with and complements our Code of Ethics and Code of Conduct. In our management of Sustainability we take inspiration from the ESG approach, which divides the areas of action into Environmental, Social and Corporate Governance.

Our materiality analysis has enabled us to define the relevant ESG factors and establish the key commitments outlined in this document. The Sustainability Policy is accompanied by thematic and operating policies in a number of areas requiring specific monitoring: Environment, Human Rights, Diversity & Inclusion, Anti-Corruption and Taxation Policies.

1. ESG - Environment

Various actions have been implemented to reduce the environmental impact of our activities on the planet. This focus has become increasingly important both in terms of Group management and in the services we provide our customers.

We have therefore issued a specific policy (the Environmental Policy) that details our commitments.

Our efforts focus on two action areas of particular relevance for the Group: **Material and energy resources and Greenhouse gas emissions**. We have defined specific actions for each area in order to reduce the direct impact of our activities. To reduce the consumption of material resources, we are committed to dematerialising our processes as much as possible. At the same time, through the energy efficiency of buildings and transport and the procurement of renewable energy, we aim to save energy resources and reduce emissions from energy consumption related to forms of transport, air conditioning in the buildings and the use of IT equipment. We have also decided to review our services, proposing innovative projects dedicated to the digitisation of our customers' processes and products, energy efficiency and the assessment and mitigation of the environmental effects of all of our services.

2. ESG - Social

We are aware that responsible management also includes the social sphere. This is why we are working to ensure the creation of an inclusive environment that considers diversity as a value to be safeguarded. We devote time and energy to the well-being and training of our employees in the knowledge that they are the key to our success.

We have issued two specific policies in this regard (the Diversity & Inclusion Policy and the Human Rights Policy) that detail our commitments.

Our actions in the social sphere cover two areas: **Inclusiveness and equality and Working conditions and environment**. In particular, we have adopted a zero-tolerance approach to any behaviour that may infringe the rights of our workers, pursuing a culture of inclusiveness and respect for diversity at all levels of the company. We guarantee our employees fair and appropriate conditions and a serene working environment that allows them to maintain a proper work-life balance. We are actively committed to promoting gender equality in order to create an environment in which everyone is able to express themselves to the full. We also promote institutional innovation and the economic growth of society through our services, fostering the development of communities and reducing social inequality. We also provide services and training activities related to cyber security and privacy issues.

3. ESG - Governance

For our Group a sustainable approach means a strategy based on the principles of integrity, transparency, legality, impartiality and prudence, as well as compliance with laws and regulations, both mandatory and voluntary. For Tinexta, sustainable governance also means supporting and fostering an approach, on the part of the Group companies and the organisation as a whole, characterised not only by respect for the law but also by proactive actions aimed at spreading the culture of anti-corruption in all its forms and, conscious of the role that tax revenues play within communities, the ethical management of tax issues.

These issues are also emphasised in two specific Policies (the Anti-Corruption Policy and the Tax Policy) which detail our commitments and are summarised below.

Within the scope of Governance, the actions we want to implement relate to the following areas: **Regulatory compliance and Transparency and integrity.**

To demonstrate our commitment in this regard, we aim to maintain a transparent and collaborative relationship with the tax authorities of the countries in which we operate, to adopt behaviours that prioritise compliance with tax regulations, and to refrain from any conduct aimed at obtaining undue tax benefits. We have also set ourselves the goal of raising our employees' awareness of anti-corruption issues and integrating a culture of legality, honesty and integrity within our *decision-making* processes.

4. ESG - Shared Cross-Cutting Actions

In addition to the actions in the three ESG areas, we have defined additional transversal commitments that cut across several aspects of sustainability. We are particularly committed to strengthening sustainability controls, defining roles and responsibilities to identify and manage risks and opportunities related to ESG factors, and periodically monitoring our goals, and have also launched awareness-raising and training activities related to ESG issues and the risks of non-compliance.

We also consider it our duty to ensure that there is a dedicated internal system for reporting violations. In particular, we provide a specific whistleblowing platform, also for reporting possible sustainability violations. Designed to ensure the confidentiality of the sources and the information that comes into our possession, without prejudice to legal obligations, the platform is accessible to all stakeholders at the following link:

<https://digitalplatform.unionefiduciaria.it/whistleblowingnew/it/accessoprincipale/identificazionegruppo?TOKEN=TINEXTAWB>

Lastly, through the preparation of the Non-Financial Statement, we want to report on and monitor the progress of the implementation of these Policies within the Group companies. To extend Tinexta's positive impact outside the Group, we have set ourselves the goal of contractually obligating all of our suppliers to comply with the Code of Ethics, Code of Conduct and this Sustainability Policy, and to use environmental, health and safety criteria when choosing suppliers.



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