



**CONSOLIDATED DISCLOSURE OF NON-FINANCIAL INFORMATION**

**AS OF DECEMBER 31, 2020**

**(Pursuant to Legislative Decree n. 254/2016)**

## TABLE OF CONTENTS

3.1	Description of the business model.....	5
3.1.1	Scale of the organization.....	7
3.1.2	Value chain.....	8
3.1.3	Stakeholders of the Group .....	9
3.1.4	Group structure.....	10
3.2	Corporate Governance.....	14
3.2.1	Ownership as of December 31, 2020.....	15
4.1	Map and legend for reading the chapter.....	16
4.1.1	Material topics .....	16
4.1.2	Risks .....	18
4.1.3	Adopted and/or practiced policies.....	18
4.1.4	Model .....	18
4.1.5	Performance indicators .....	19
4.2	Environmental field.....	20
4.2.1	Material topics .....	20
4.2.2	Risks .....	20
4.2.3	Policies adopted and/or practiced.....	20
4.2.4	Model.....	20
4.2.5	Performance indicators .....	21
4.3	Social field .....	23
4.3.1	Material topics .....	23
4.3.2	Risks .....	23
4.3.3	Policies adopted and/or practiced.....	23
4.3.4	Model.....	24
4.3.5	Performance indicators .....	24
4.4	Human resources .....	25
4.4.1	Material topics .....	25
4.4.2	Risks .....	25
4.4.3	Policies adopted and/or practiced.....	25
4.4.4	Model.....	26
4.4.5	Performance indicators .....	26
4.5	Respect of human rights field .....	29
4.5.1	Material topics .....	29
4.5.2	Risks .....	29
4.5.3	Policies adopted and/or practiced.....	29
4.5.4	Model.....	29
4.5.5	Performance indicators .....	29
4.6	Anti-corruption field (active and passive) .....	31
4.6.1	Material topics .....	31
4.6.2	Risks .....	31
4.6.3	Policies adopted and/or practiced.....	31
4.6.4	Model.....	31
4.6.5	Performance indicators .....	32
5.1	The reporting scope and standard.....	33
5.2	The reporting process and the calculation methods.....	34
5.3	GRI Content Index.....	35

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## 1. INTRODUCTION

On December 6, 2014, Directive 2014/95/UE (also the “**Directive**”) of the European Parliament and Council, relating to the disclosure requirements about non-financial information and diversity policies for large public-interest entities, came into force. The Directive shows the will of the community legislator to contribute to the transition to a global sustainable economy that combines long-term profitability, social justice and environmental protection, by promoting the development of companies that adopt transparent management policies oriented to achieve better performances also in non-financial aspects.

Under Italian Law, the Directive was transposed by Legislative Decree n. 254 of December 30, 2016 (also the “**Decree**” or the “**L.D. 254/2016**”), which requires for the large public-interest entities<sup>1</sup> the publication of a consolidated disclosure of non-financial information (also the “**NFI**”, shorthand for Non-Financial Information) which covers information, to the extent necessary to ensure an understanding of the group’s activities, performance, results, and impact, related to five fields, which are: environmental, social, human resources, respect of human rights and active and passive anti-corruption topics, which are relevant, considering the activities and the characteristics of the group. In particular the Decree, with reference to these five fields, requires at least a description of the main risks, generated or endured, any policies adopted, the related performance indicators and the business model for the management and organization of the activities (Art. 3 par. 1).

Gruppo MutuiOnline S.p.A., as a large public-interest entity, is subject to the provisions of the above-mentioned Decree, starting from the disclosure for the year ended December 31, 2017. This NFI, which refers to 2020, reports data and information related to the financial year ended December 31, 2020 and, for comparison purposes, of the financial years ended December 31, 2018 and 2019.

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<sup>1</sup> As defined by Art. 1 par. 1 of the Decree

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## 2. LETTER TO STAKEHOLDERS

*Dear readers,*

*The obligation to prepare the Non-Financial Information, in accordance with Legislative Decree 254/2016, required the Group to start a process to report its performance in the environmental, social, personnel and human rights management, and anti-corruption areas and to pay even greater attention to the impacts that our activity produces on the social and environmental sphere in the short, medium and long term.*

*The Group's activities are based on respect for values such as legality, transparency, the protection of human resources, equal opportunities and the development of a positive working environment. Respect for such values, reported in the Code of Ethics, is extended to all employees and third parties with relations with the Group.*

*The Group currently has over 2,300 employees, who represent a fundamental resource for the business. For this reason, we have always promoted a culture focused on the valorization and growth of our employees, recognizing their results.*

*In this year, strongly characterized by the Covid-19 pandemic, the Group has taken prompt action, also on the basis of the measures issued by the Government, to contain the possible impacts of the health threats to its employees, and has equipped its personnel with all the necessary tools to continue working remotely and in safe conditions.*

*We hope that this report will be of interest for a better understanding of the most relevant non-financial aspects for the Group and its stakeholders.*

*Marco Pescarmona*

*Chairman of the Board of Directors*

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### 3. THE MUTUIONLINE GROUP

#### 3.1 Description of the business model

Pursuant to art. 3, par. 1.a, of the L.D. 254/2016, a brief description of the business model adopted by the Group is provided below.

Gruppo MutuiOnline S.p.A. (the “**Company**” or the “**Issuer**”) is the holding company of a group of firms (the “**Group**”) with an important position in the Italian market for the online comparison, promotion and intermediation of products provided by financial institutions, e-commerce operators and utilities providers (main websites [www.mutuionline.it](http://www.mutuionline.it), [www.prestitionline.it](http://www.prestitionline.it), [www.segugio.it](http://www.segugio.it), [www.trovaprezzi.it](http://www.trovaprezzi.it) and [www.sostariffe.it](http://www.sostariffe.it)) and in the Italian market for the provision of complex business process outsourcing services for the financial sector.

The Group operates through two different divisions (the “**Divisions**”), as described below.

The **Broking Division** operates in the Italian market for loan distribution as a credit intermediary, in the market for insurance distribution as a broker, in the market for the promotion of e-commerce operators, and utilities providers. The activities carried out by our Broking Division are organized mainly into the following business lines, on the basis of the type of underlying product:

- (a) **Mortgage Broking:** broking mortgage loans mainly through remote channels ([www.mutuionline.it](http://www.mutuionline.it) website) and through a network of agents in the field (Money360 Network);
- (b) **Consumer Loan Broking:** broking consumer loans (prevalently personal loans) through remote channels ([www.prestitionline.it](http://www.prestitionline.it) website);
- (c) **Insurance Broking:** broking insurance products, mainly motor third party liability and other motor insurance products through remote channels ([www.cercassicurazioni.it](http://www.cercassicurazioni.it) website);
- (d) **E-Commerce Price Comparison:** comparison and promotion of e-commerce operators ([www.trovaprezzi.it](http://www.trovaprezzi.it) website);
- (e) **Telco & Energy Comparison:** comparison and promotion of telecommunications and energy services ([www.sostariffe.it](http://www.sostariffe.it) website).

The activity of the Broking Division is also carried out under the “**Segugio.it**” brand ([www.segugio.it](http://www.segugio.it) website), which operates as an aggregator for insurance and credit products, mainly propelled by television and online advertising focused on insurance products. Each section of the website is however managed by the product companies of the Group and the related revenues are reported within the above mentioned business lines.

Besides, subsidiary Innovazione Finanziaria SIM S.p.A. – authorized provider of placement services to the public without underwriting or warranties pursuant to article 1, comma 5, letter c-bis, of Legislative Decree no. 58 of February 24, 1998 - operates, by means of the [www.fondionline.it](http://www.fondionline.it) website, an on-line mutual fund supermarket.

The **BPO Division** provides outsourcing services of core processes for banks, credit institutions, insurance companies and investment companies, with a high level of specialization in some reference verticals.

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Our BPO services are structured along six separate business lines, on the basis of the type of services rendered and the type of underlying financial product:

- (a) **Mortgage BPO:** provides remote loan sales and packaging and mortgage underwriting and closing services; in this business line we also include para-notarial services;
- (b) **Real Estate Services BPO:** offers real estate appraisal services and technical real estate services for operators in the financial sector;
- (c) **Loans BPO:** provides application processing and portfolio management services for salary/pension guaranteed loans, and for business loans to companies, also assisted by a guarantee from the State;
- (d) **Insurance BPO:** provides outsourcing services for the management of mass not-motor insurance claims;
- (e) **Investment services BPO:** provides complete operational service solutions and technology platforms to investment and management companies;
- (f) **BPO Leasing/Rental:** provides administrative outsourcing services for leasing and long-term rental operators.

As described previously, in order to deal with the Covid-19 pandemic, the Group has put in place a series of measures to limit the possible impacts of health threats to its employees, and has equipped its personnel with all the necessary tools to continue to work safely and, where appropriate, remotely. The Group's business model, which has not changed as a result of the impacts of the pandemic, has shown strong resilience to the exceptional consequences and to changes in the context in which the Group operates.

The Business Lines whose economic results were most impacted, in either direction, by the Covid-19 pandemic:

- Leasing/Rental BPO, which recorded revenues down 0.3% compared to 2019, mainly due to the restrictions imposed on commercial and administrative activities in the automotive sector, in particular during the first half of the year;
- Real Estate Services BPO (with revenues down 4.4%), characterized by a contraction in volumes during the lockdown;
- Consumer Loan Broking, which recorded revenues down by 17.1 compared to 2019, mainly due to the current great prudence of financial institutions in the origination of new personal loans;
- E-Commerce Price Comparison was instead positively impacted by the consequences of the pandemic; such business line recorded revenues up by 45% compared to 2019, partially due to increased demand for online purchases during the lockdown.

On the basis of the results achieved during the year, there are no elements that could put into question the going concern assumption according to which the financial statements have been prepared.

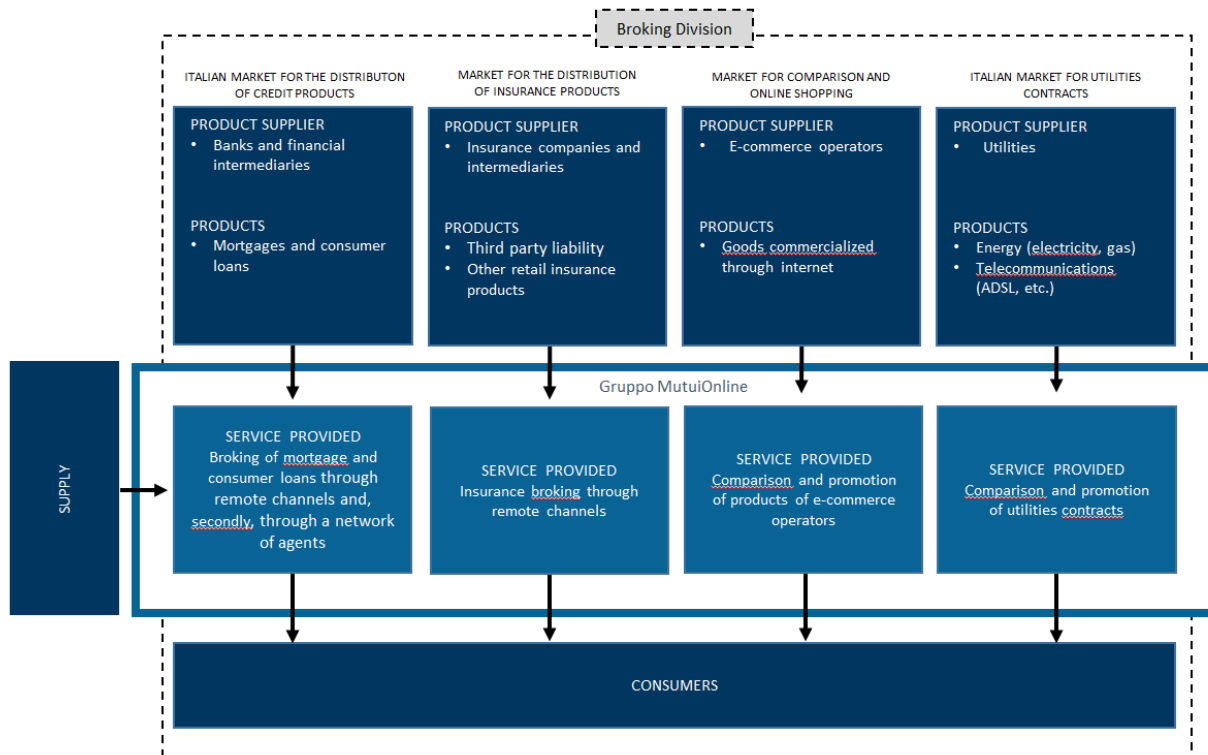
### 3.1.1 Scale of the organization

The Issuer show an average market capitalization equal to Euro 846 million in 2020. The consolidated revenues as of December 31, 2020 are equal to Euro 259 million, broken down by business lines as follows:

<i>(euro thousand)</i>	<b>December 31, 2020</b>
Mortgage Broking	47,777
Consumer Loan Broking Business	4,579
Insurance Broking	20,394
E-Commerce Price Comparison	34,475
Telco & Energy Comparison	3,235
Other revenues of Broking Division	593
<b>Total revenues of the Broking Division</b>	<b>111,053</b>
Mortgage BPO	55,248
Real Estate Services BPO	18,274
Loans BPO	25,015
Insurance BPO	7,622
Investment Services BPO	9,267
BPO Leasing/Rental	31,992
Other revenues of BPO Division	915
<b>Total revenues of the BPO Division</b>	<b>148,333</b>
<b>Total revenues</b>	<b>259,386</b>

### 3.1.2 Value chain

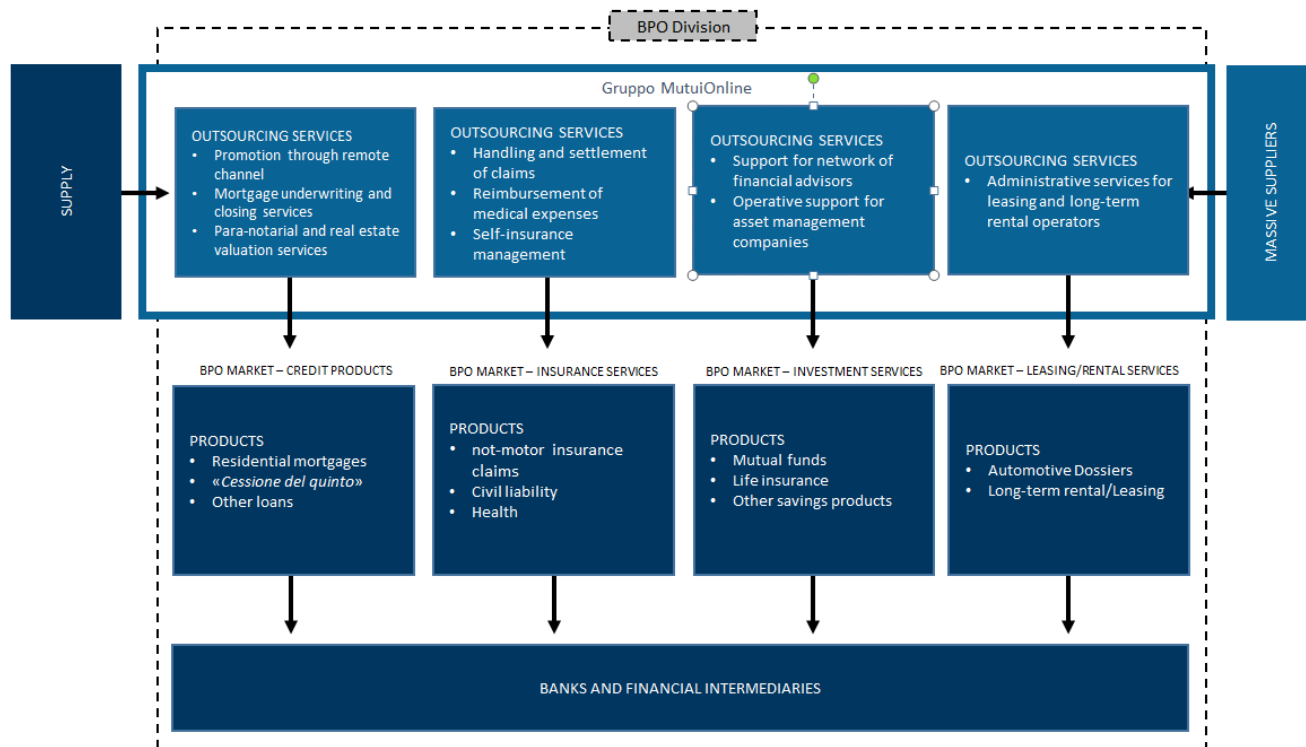
Below we provide a simplified representation of the Group’s value chain, split for the Broking and BPO Divisions, useful for the mapping and description (in the following chapters of this document) of the risks, the operating model and the policies adopted with reference to the relevant topics pertaining to the five fields specifically required by the regulator in Legislative Decree 254/2016 art. 3 par. 1 (environmental, social, human resources, respect for human rights, anti-corruption).



The main items of the value chain of the Broking Division are:

- the services provided by the companies of Broking Division, which are positioned in their respective markets between the providers of the various products/services – the product suppliers – and the consumers who benefit from such services;
- the product suppliers, such as banks, financial intermediaries, insurance companies, e-commerce and utilities operators and the related products. The revenues of Broking Division are from the product suppliers, which benefit from the distribution and comparison services provided by the Group toward consumers;
- the consumers, as well as beneficiaries, of the different services provided by the companies of Broking Division; the services offered do not entail additional costs for the consumers who, for this reason, are described as beneficiaries of the services provided by the companies of Broking Division;
- the supply of goods and services useful to the pursuit of the activities of the Group (e.g. advertising, IT systems, advisory services, utilities, etc.).





The main items of the value chain of the BPO Division are:

- the services provided by the companies of the BPO Division, which impact different products in their respective markets (e.g. processing services for retail mortgage underwriting). The services provided by the Group are offered on behalf and sometimes in the name of its financial institution clients;
- the products related to the services provided by the companies of BPO Division;
- the customers who benefit from the services provided by the companies of BPO Division, such as banks, financial intermediaries, insurance companies, etc.;
- the supply of goods and services useful to the pursuit of the activities of the Group (e.g. advertising, IT systems, advisory services, utilities, etc.);
- the massive suppliers who provide certain services to the entities of the BPO Division (e.g. public notaries, real estate appraisers, insurance experts, etc.).

### 3.1.3 Stakeholders of the Group

The Group recognizes the importance of ethical and social responsibility in the conduct of business and corporate activities and it is committed to taking into account the legitimate interests of its stakeholders and the community in which it operates.

Stakeholders are entities or individuals with an interest in the activities of the Group or whose actions may significantly influence its activities. Below are reported the stakeholders identified as relevant for the Group, and the respective communication or engagement channels with them:

<i>Stakeholder</i>	Communication/engagement channels
Shareholders	<ul style="list-style-type: none"> <li>• Road shows and conference calls</li> <li>• One-to-one meetings</li> </ul>
Clients	<ul style="list-style-type: none"> <li>• Typical business meetings as part of business development</li> <li>• Events and workshops</li> </ul>
Competitors	<ul style="list-style-type: none"> <li>• Sector conventions</li> </ul>
Employees	<ul style="list-style-type: none"> <li>• Internal communications through corporate dialogue channels</li> <li>• Performance appraisal processes</li> <li>• Meetings</li> <li>• Corporate events</li> </ul>
Supervisory bodies	<ul style="list-style-type: none"> <li>• Corporate documentation</li> </ul>
Supplier	<ul style="list-style-type: none"> <li>• Business meetings</li> <li>• Qualification and selection process</li> </ul>
Final users	<ul style="list-style-type: none"> <li>• Group websites</li> </ul>

With regard to the communication channels described above, it should be noted that, during 2020, due to the restrictions for the containment of the pandemic, some of the engagement channels (e.g. events and road shows), were held in digital form.

The Group provides various communication channels to its stakeholders in order to receive reports of any violation of the Ethical Code. In 2020, there were no relevant aspects or reports of significant complaints received from stakeholders of the Group.

Finally, it should be noted that some companies of the Group are members of trade associations, such as Assilea, Assofin, Assovib, Unirec.

### 3.1.4 Group structure

As of December 31, 2020, the holding Gruppo MutuiOnline S.p.A. controls, also indirectly, the following companies:

- MutuiOnline S.p.A., Money360.it S.p.A., PrestitiOnline S.p.A., CercAssicurazioni.it S.r.l., Segugio.it S.r.l., Segugio Servizi S.r.l., 7Pixel S.r.l., Klikkapromo S.r.l., Innovazione Finanziaria SIM S.p.A., SOS Tariffe S.r.l., SOS Broker S.r.l., SOS Dev S.r.l. and SOS Consulting S.r.l.: operating in the market for the online comparison, promotion and intermediation of products provided by financial institutions and e-commerce operators to retail consumers; together they represent the “**Broking Division**” of the Group;
- Centro Istruttorie S.p.A., Centro Finanziamenti S.p.A., Quinservizi S.p.A., CESAM S.r.l., Mikono S.r.l., Centro Processi Assicurativi S.r.l., EuroServizi per i Notai S.r.l., MOL BPO S.r.l., Agenzia Italia S.p.A., 65Plus S.r.l., Eagle & Wise Service S.r.l., Eagle Agency S.r.l., Finprom S.r.l. (a company with registered office in Romania) and Gruppo Lercari S.r.l. with its subsidiaries: companies operating in the Italian market for the provision of complex business

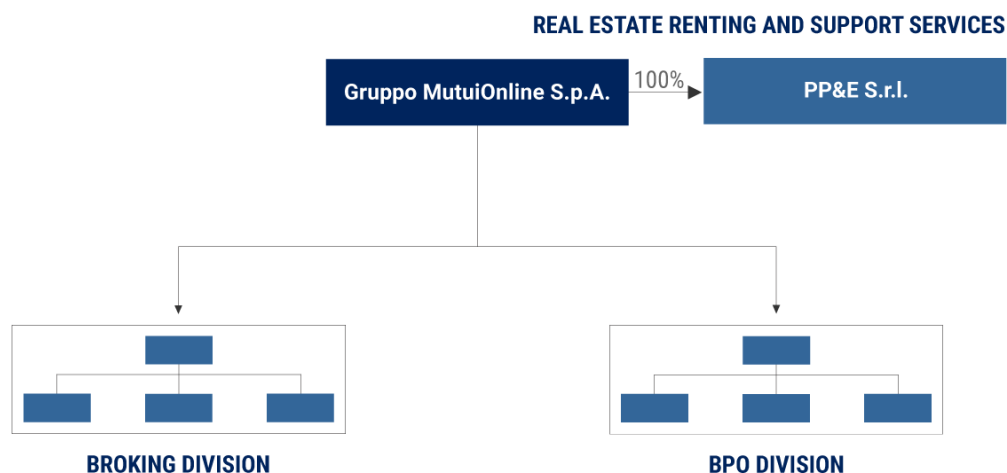
process outsourcing services for the financial sector; together they represent the “**BPO** (i.e. Business Process Outsourcing) **Division**” of the Group;

- PP&E S.r.l.: offering real estate renting and support services to the other Italian subsidiaries of the Issuer.

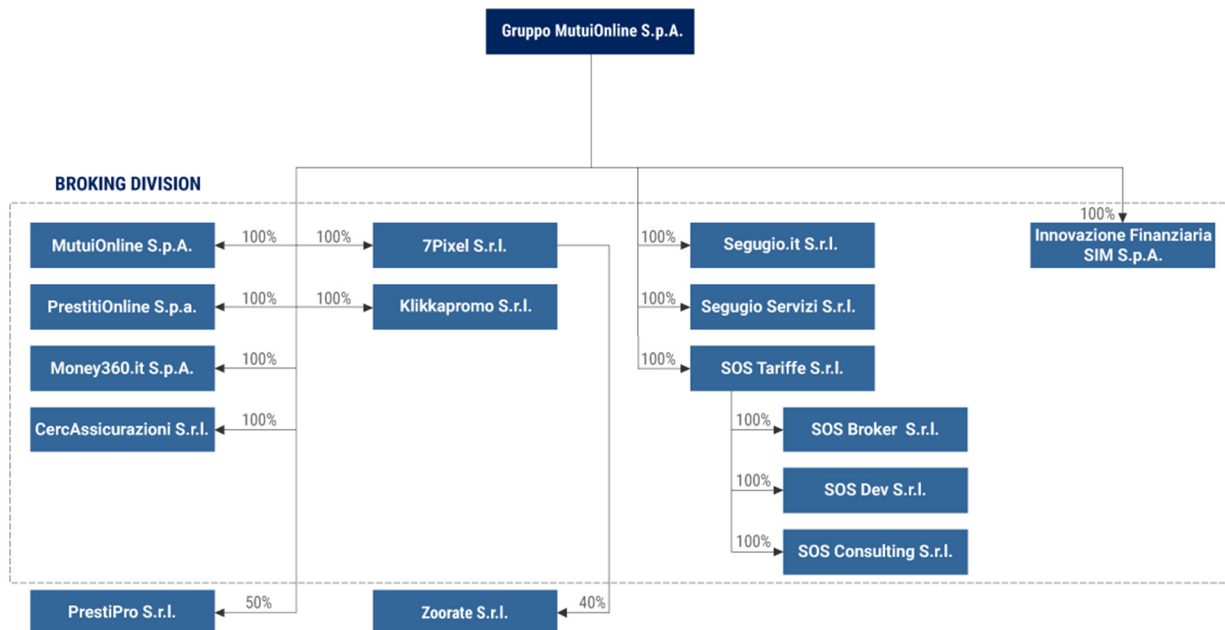
It should be noted that Gruppo Lercari S.r.l. controls the following subsidiaries: Lercari S.r.l., Service Lercari S.r.l., Sircus S.r.l., San Filippo S.r.l., JPL S.r.l., Lercari International Ltd (a company with registered office in UK), Forensic Experts S.r.l., GSA S.r.l., Centro Servizi Integrati S.r.l. and Cult Academy S.r.l. (together, the “**Lercari Group**”).

In addition, the Issuer owns 40% of the share capital of Generale Servizi Amministrativi S.r.l., 40% of the share capital of Zoorate S.r.l. through subsidiary 7Pixel S.r.l., 50% of the share capital of the joint venture PrestiPro S.r.l., 40% of the share capital of Generale Fiduciaria S.p.A., 70% of the share capital of Fin.it S.r.l. (non-controlled company) through subsidiary Agenzia Italia S.p.A. 40% of the share capital of LC Servizi S.r.l., 50% of the share capital of Sircus Gandino S.r.l. and 50% of the share capital of Global Care S.r.l. in liquidazione, through the subsidiary Gruppo Lercari S.r.l.

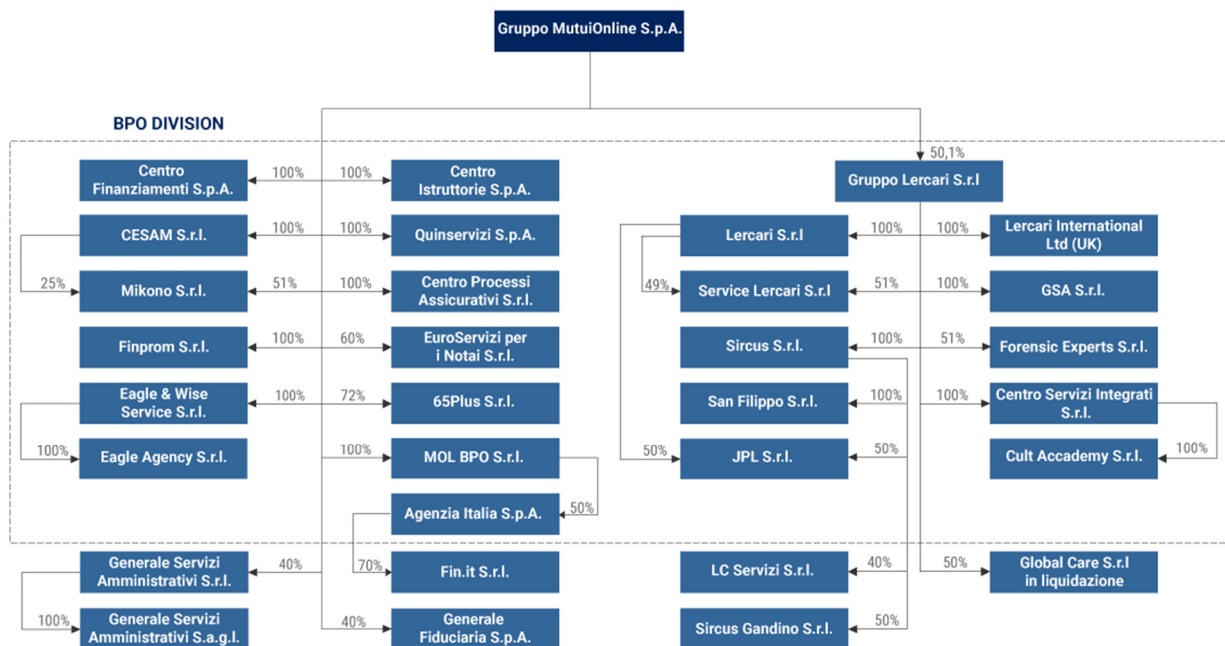
The consolidation area as of December 31, 2020, shown below, changed compared to the previous year, due to the acquisition of Gruppo Lercari S.r.l. and SOS Tariffe S.r.l. in the fourth quarter of 2020. In addition, the consolidation area changed also with reference to IN.SE.CO S.r.l. and Eagle NPL Service S.r.l., which were merged by incorporation in Quinservizi S.p.A..



Broking Division:



BPO Division:



The companies indicated above are all based in Italy, except for Finprom S.r.l., a company incorporated under Romanian law, and Lercari International Ltd, a company incorporated under English law.

As indicated in the methodological note, operating offices with less than 10 employees as at December 31, 2020<sup>2</sup> and operating offices of Gruppo Lercari and SOS Tariffe (and its subsidiaries), acquired in the last part of 2020, are excluded from environmental reporting.

The following are the main operating sites of the Group with more than 10 employees as at December 31, 2020 and the relative companies that carry out their activities there.

## OPERATING SITES COMPANIES

Milan <i>Via Desenzano, 2</i> <b>HEADQUARTER</b>	Gruppo MutuiOnline S.p.A. MutuiOnline S.p.A. PrestitiOnline S.p.A. CercAssicurazioni.it S.r.l. Segugio.it S.r.l. Segugio Servizi S.r.l. Money360.it S.p.A. Innovazione Finanziaria SIM S.p.A. Klikkapromo S.r.l. Centro Istruttorie S.p.A. Centro Finanziamenti S.p.A. EuroServizi per i Notai S.r.l. PP&E S.r.l. 65Plus S.r.l. SOS Tariffe S.r.l.
Cagliari <i>Via Igola snc</i>	Operating office of BPO Division
Monastir (CA) <i>SS 131 - KM 17,100</i>	Centro Istruttorie S.p.A. PP&E S.r.l.
Faenza (RA) <i>Via Ossani, 14-30</i>	Quinservizi S.p.A.
Genova <i>Via De Marini, 53</i>	Centro Processi Assicurativi S.r.l.
Giussago (PV) <i>Via Lanzoni, 13</i>	7Pixel S.r.l.
Varese <i>Via Dazio Vecchio 7</i>	7Pixel S.r.l.
Arad – Romania <i>Str. Cocoril n.24/A</i>	Finprom S.r.l.

<sup>2</sup> Since this hypothesis refers only to situations that are not significant from an environmental point of view, it does not compromise the ability to ensure an understanding of the company's activities, its performance, results and impact, as required by the Legislative Decree 254/2016.

Oradea – Romania <i>Str. Nufarului, Nr. 28E</i>	Finprom S.r.l.
Cascina (PI) Viale Comaschi, 60	SOS Dev S.r.l.
Tirana - Albania	Albanian branch of SOS Tariffe S.r.l.
Genova <i>Via Roma, 8/A</i>	Operating office of Lercari Group
Conegliano (TV) <i>Via Alfieri, 1</i>	Agenzia Italia S.p.A.
San Vendemiano (TV) <i>Via Venezia, 13</i>	Agenzia Italia S.p.A.
Trento <i>Via Lunelli, 27</i>	Agenzia Italia S.p.A.
Milano <i>Viale Sarca, 222</i>	Eagle&Wise Service S.r.l. Eagle Agency S.r.l. CESAM Centro Servizi Asset Management S.r.l. Mikono S.r.l.

### 3.2 Corporate Governance

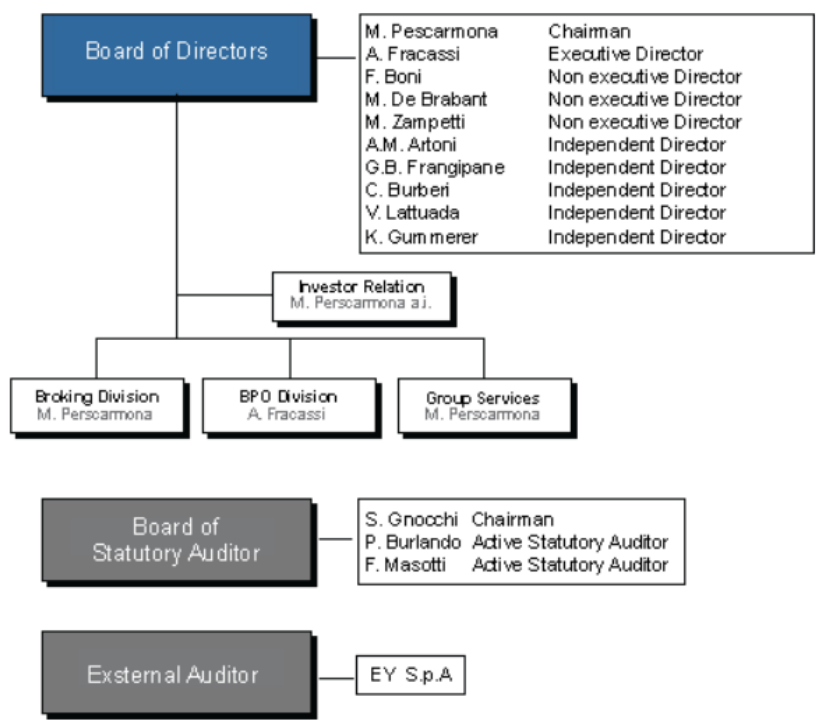
The Group adopts, as a reference model for its own corporate governance, the principles outlined in the Code of Conduct promoted by Borsa Italiana S.p.A. and complies with it.

As indicated in the Financial Report for year 2020, available on [www.gruppomol.it](http://www.gruppomol.it) website in the “Investor Relations” section, where additional information can be found, the Issuer adopts a traditional model of administration and control:

- the business management is assigned to the Board of Directors;
- the supervisory functions are handled by the Board of Statutory Auditors;
- the statutory audit as well as the accounting control activities are performed by the independent auditing firm appointed by the Shareholders’ Meeting.

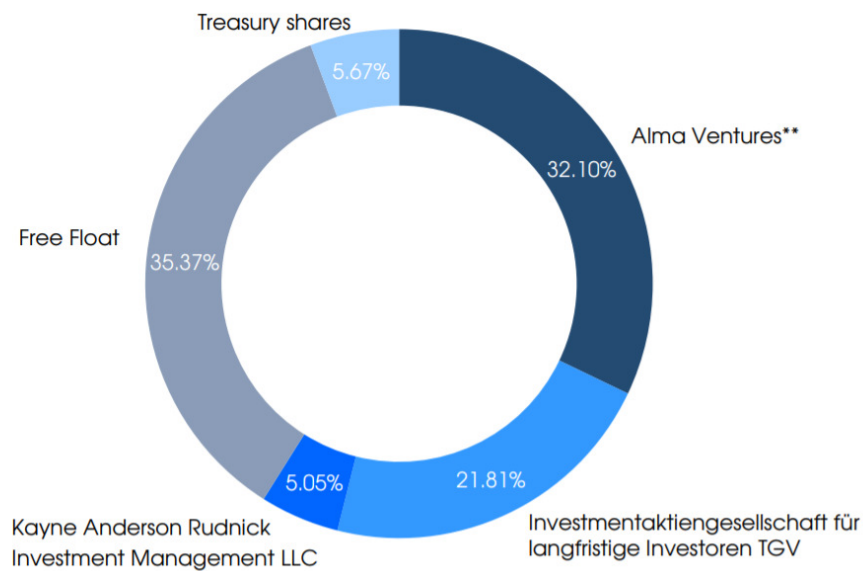
The composition of the Board of Directors of Gruppo MutuiOnline S.p.A., and in particular the disclosure required by Art. 10 par. 1 of the Legislative Decree 254/2016 pertaining the diversity of the administration, governing and control bodies is described in the Report on Corporate Governance and Ownership Structure for the year 2020 in paragraph 4.2.

Below we outline the high-level organizational structure of the Group as of December 31, 2020, provided that each controlled company remains self-standing and organizationally autonomous.



### 3.2.1 Ownership as of December 31, 2020

The ownership as of December 31, 2020 is shown below:



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## 4. QUALITATIVE AND QUANTITATIVE DESCRIPTION OF RISKS, POLICIES ADOPTED AND/OR PRACTICED, BUSINESS MODEL AND PERFORMANCE INDICATORS WITH REFERENCE TO THE FIVE TOPICS INDICATED BY THE LEGISLATIVE DECREE 254/2016

### 4.1 Map and legend for reading the chapter

Consistently with the art. 3 of the Decree, par. 1 and 2, this NFI includes both descriptive aspects (e.g. policies, risks, governance) and results in term of performance.

In order to comply with L.D. 254/2016, with reference to the five fields indicated by the regulator (environmental, social, human resources, respect for human rights, anti-corruption), during 2020 the Group performed the following key steps:

- update of the materiality analysis;
- update of the mapping of the main risks, included those linked to the Covid-19 pandemic, generated or endured, that arise from the activities of the Group, from its products, services or business relations, included the supply chain, and the management arrangements adopted;
- update of the qualitative contents of the adopted policies, if applicable, and of the governance model adopted for the management of the five topics indicated by the regulator;
- implementation of processes for the collection, aggregation and transmission of the data and information required for the performance indicators selected based on the relevant topics for the Group and required by the selected reporting standard (for further details please refer to the Methodological Note of this document).

For a greater accessibility to the text, we decided to describe first the qualitative transversal disclosures (applicable to the five topics), and subsequently the qualitative and quantitative disclosures related to the individual topics required by the regulator.

#### 4.1.1 Material topics

In 2020 the Group confirmed the materiality analysis developed for the previous financial year. In line with the provisions of the Decree and the Reporting Standard, such analysis kept into consideration the “Topic-specific Standard” list provided by the GRI Sustainability Reporting Standards, which represent the reporting standards used for this NFI, based on the outcome of the following analyses:

- global sustainability trend analysis, such as the main non-financial aspects taken into consideration by the most important stock exchanges which published guidelines for sustainability reports (Sustainability Stock Exchange Initiative), by the sustainability rating agencies (DJSI, MSCI, etc.), by international organizations (GRI, World Economic Forum, etc.) and by governments (EU, UN, etc.);
- sector stress analysis, such as the non-financial aspects that emerged as relevant for the market sector of the Group. In particular, we analyzed the directions included in the publications of some international organizations (e.g. RobecoSam) for the Brokerage, Diversified Financials and Insurance, and IT Services sectors;



- Group priorities recognition, with reference to the five topics of the L.D. 254/2016, based on the analysis of the main business documents (Ethical Code, Organizational Model pursuant to Law Decree 231/2001, etc.) and interviews to top management.

The results of the analyses carried out were also the subject of a workshop involving the Group's top management and in which, through a topic prioritization exercise, the material topics were defined and validated. The topics identified as material, and therefore subject to reporting in this NFI, reflect the environmental, social, personnel management, human rights and anti-corruption impacts that are significant for the Group. Non-financial topics, also confirmed in 2020, were analyzed along the following dimensions:

- the impact that the Group has from an economic, environmental and social point of view as well as the contribution that it can generate (negative or positive);
- the relevance of economic, environmental and social topics in relation to the extent to which they can influence the assessments and decisions of the stakeholders of the Group.

The non-financial topics identified as material for this year are shown below:

Areas of L.D. 254/2016	Material non-financial topics for the Group
Environment	Energy consumption
	Atmospheric emissions (greenhouse gas)
Social	Privacy protection
	Social and economic compliance
	Business ethics
Human resources	Personnel management
Human rights	Non-discrimination
Anti-corruption	Fight against corruption

It should be noted that, in line with the previous year, pursuant to the analysis performed, some of the topics expressly indicated by the Legislative Decree 254/2016 resulted not relevant (in particular: the use of water resources, the polluting emissions in the atmosphere, the impact on the environment, on the health and on the safety related to significant environmental and health risk factors, the actions taken to ensure gender equality, the actions taken to implement international and supranational conventions concerning employment, how the dialogue with social parties occurred). The Group considered the relevance of such topics not significant, considering the activities performed and the countries where the companies of the Group operate, as well as the connected risks.

Finally, the Group does not consider the topic of tax compliance to be material, as almost all taxes are paid in Italy, where all Group companies are based, with the exception of Finprom S.r.l., a company incorporated under Romanian law, and Lercari International Ltd, a company incorporated under English law.

#### 4.1.2 Risks

The main risks identified for the five non-financial topics required by the regulator, that may be relevant in the perspective of the continuation of the Group long-term business strategy, are reported below in each thematic paragraph.

We instead consider as transversal risks (homogeneously applicable for all non-financial topics) the reputational risks related for example to the failure to respect formal commitments of the organization or to the onset of critical issues – environmental, social, relating to service quality, pertaining the corruption, etc. – relating to the supply chain.

The activity of non-financial risk identification is carried out in addition to the mapping and risk management process related to the sensitive areas of activity described in the Organizational Model pursuant to Law Decree 231/2001 (please also refer to the “Model” section below). In this context, we point out that the internal control and risk management system implemented by the Group is based on the principle that the risk is managed by the directly involved business process owner. The main risks are reported and discussed at level of Group top management, in order to create the conditions for their mitigation, insurance and evaluation of the residual risk.

#### 4.1.3 Adopted and/or practiced policies

The Group Ethical Code, adopted by all the companies of the Group – except for Agenzia Italia S.p.A. and Eagle & Wise Service S.r.l., as they have their own 231 Model and the relative Ethical Code, and the Lercari Group, acquired recently – defines the behavior standards and the guidelines pertaining the topics requested by the Legislative Decree 254/2016. Currently, we considered it unnecessary to formalize further Group policies with specific reference to the topics indicated by the Decree, also in the light of the functioning of the established practices. The main policies adopted by the Group regarding those topics are indicated in the paragraphs named “Policies adopted and/or practiced” in the following pages.

It is the responsibility of the top management to evaluate the potential opportunity to proceed to the formalization of appropriate policies.

In correspondence with each individual paragraph, the policies adopted by subsidiaries Agenzia Italia S.p.A., Eagle & Wise Service S.r.l. and by the Lercari Group, are also briefly reported and described. These subsidiaries, considering their recent acquisition, have begun a process of integration and alignment with Group practices.

#### 4.1.4 Model

The Group adopted the Organizational Model pursuant to Law Decree 231/2001 (also the “**231 Model**”) which represents, together with the Ethical Code, a further means of sensitization of all employees and all those who, for various reasons, collaborate with the Group in order to ensure, in the carrying out of their activities, proper and clear behaviors coherent with the ethical and social values to which the Group is inspired, in the pursuit of the business object and such as, however, to prevent the risk of committing the crimes considered by the Decree. The 231 Model was implemented after having evaluated the level of risk of committing the crimes considered by the 231 Model. During 2018, the 231 Model and the Ethical Code of the Group were updated and published on the Group’s institutional website at the following link: [https://www.gruppomol.it/eng/governance/other\\_documents.asp](https://www.gruppomol.it/eng/governance/other_documents.asp).

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It is worth pointing out that subsidiaries Agenzia Italia S.p.A. and Eagle & Wise Service S.r.l. adopt a 231 Model and an Ethical Code different from those adopted by the Group, in compliance with the same principles. In the course of the discussion, any differences between the organizational models of the Group and those of Agenzia Italia S.p.A. and Eagle & Wise Service S.r.l., as well as aspects relating to the latter's internal procedures with respect to non-financial issues, will therefore be explained, where needed. It should be noted that the organizational model of Agenzia Italia S.p.A. was updated in May 2019.

In addition to what is described above, the operating management of the topics pertaining the five areas indicated by Decree 254/2016, is delegated to the individual companies of the Group, if such aspects are applicable. The minimum requirement that all companies of the Group must ensure, without possibility of derogation, is compliance with locally applicable regulations (e.g. environmental, related to health and safety aspects, to the fight against corruption, etc.).

#### **4.1.5 Performance indicators**

The Group reports non-financial indicators coherently with the issues identified with the materiality analysis described in the paragraph 3.1.1. In the following pages, in correspondence with each topic of L.D. 254/2016, we report the quantitative and qualitative data required by the disclosure standard, with some detailed indications, if relevant, useful to the comprehension of the data.

Any specifications regarding the calculation methodology and the extension of the data coverage are reported in the Methodological Note or, on a case-by-case basis, specified in correspondence with the pertaining data.

## 4.2 Environmental field

### 4.2.1 Material topics

Based on the analysis conducted (for any details please refer to the introduction of this chapter), the material environmental topics for the Group appear to be:

- energy consumption;
- atmospheric emissions (greenhouse gas).

### 4.2.2 Risks

The main risks identified in the environmental field, that may be relevant in the perspective of the pursuit of our long-term business strategy, are attributable to:

- compliance risks, in case of regulatory developments, linked in particular to energy consumption and to the related direct and indirect greenhouse gas emissions;
- financial and reputational risks, linked to the energetic needs of the Group, that could involve missed financial savings and non-compliance with environmental standards required by customers and suppliers;

With regard to possible impacts related to climate change - such as the increase in extreme weather events, the increase in average global temperatures and sea level - the Group, operating in the services sector, has not identified any particular risks. In addition, the Group has not identified any significant transitional risks, such as increased reporting requirements related to greenhouse gas emissions or changes in consumer preferences that would impact the Group's results or activities.

The Group's risk management procedures are based on a process aimed at increasing the production of electricity from renewable sources through the installation of photovoltaic panels at its operating sites.

### 4.2.3 Policies adopted and/or practiced

The Group, as indicated in the Ethical Code, is committed to respect the environment in compliance with all regulations for the protection of environmental and personnel safety.

In 2019, the operating office of Finprom in Romania, has adopted an environmental policy named "Go Green Policy", which provides a series of rules or suggestions aimed at using renewable resources and proactively reducing pollution in various areas, such as travelling by public transport, the separate collection of waste and consumables, incentives to use bicycles to go to work, extending the life time of company assets, and the intelligent use of electricity.

### 4.2.4 Model

The operating management of energy consumptions is delegated to the individual companies/operating offices. The commitment to the safeguard of the environment is realized through the use of renewable energy sources in some of the main offices where the Group carries its own activity. In particular, the operating office of 7Pixel S.r.l. in Giussago uses a photovoltaic system that, in addition to covering the energetic needs of the company, produces an electricity surplus that is re-entered into the national electrical grid. The Group has also built photovoltaic systems for its operating sites in Cagliari and Monastir, which have gone into operation in the first months of 2019.

#### 4.2.5 Performance indicators

The indicators related to the environmental field, and to the material topics linked to it, concern the direct and indirect energy consumption by the Group and the related greenhouse gas emissions.

The most significant energy consumptions of the Group are related to the electric energy supply from the national grid. Lower consumptions are instead linked to natural gas, mainly used for heating some offices. Diesel and gasoline fuel consumptions, finally, are related to the occasional functioning of back-up power generators, and to some of the vehicles used by personnel of the Group. The decrease of electric energy and fuel consumptions in 2020 is attributable to the Covid-19 pandemic, which led to a lower utilization of operating offices.

<b>Energy consumption<sup>3</sup></b>				
	<b>Unit of measurement</b>	<b>2020</b>	<b>2019</b>	<b>2018<sup>4</sup></b>
Natural Gas	GJ	1,918.4	3,084.9	2,303.9
Diesel Fuel	GJ	1,115.9	1,656.1	1,155.5
Petrol Fuel	GJ	56.9	152.0	-
Electricity from national electrical grid <sup>5</sup>	GJ	9,880.8	10,333.1	9,788.9
<b>Total</b>	<b>GJ</b>	<b>12,972.1</b>	<b>15,226.1</b>	<b>13,248.4</b>

Concerning the electric energy production through renewable sources, in 2020 the total production of installed plants amounts to 1,450.7 GJ (1,709.9 GJ in 2019), largely used to cover the energetic needs of the offices where these plants are located.

<b>Energy produced from renewable sources</b>				
	<b>Unit of measurement</b>	<b>2020</b>	<b>2019</b>	<b>2018</b>
Energy from renewable sources produced and consumed	GJ	1,174.9	1,428.9	547.8
Energy from renewable sources produced and sold	GJ	275.9	281.0	171.2
<b>Total</b>	<b>GJ</b>	<b>1,450.7</b>	<b>1,709.9</b>	<b>719.0</b>

In 2020, the total energy consumption, from non-renewable sources, of the Group is therefore equal to 12,972.1 GJ, to which are added 1,174.9 GJ of energy consumption from renewable sources. Finally, regarding greenhouse gas emissions, coherently with consumption, the most significant values are recorded for the emissions due to the electric energy supply, equal to 889.3 tons of CO<sub>2</sub> in 2020.

<sup>3</sup> As detailed in the Methodological Note, environmental reporting refers to all the Group operating sites with at least 10 employees.

<sup>4</sup> Finally, it should be noted that the figure for natural gas consumption in 2018 has been updated according to new information made available during 2019. Related direct emissions (Scope 1) have been consequently updated.

<sup>5</sup> Regarding the electricity purchased through the electrical grid, the percentage of electricity produced through renewable sources depends on the individual national electric mix

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Direct (Scope 1) and energy indirect (Scope 2) emissions of greenhouse gases				
	Unit of measurement	2020	2019	2018
Fuel consumption (Scope 1)	tCO <sub>2eq</sub>	196.3	309.9	217.2
Electric energy - Location based (Scope 2)	tCO <sub>2</sub>	889.3	993.9	916.4
<b>Total - Location based</b>	<b>tCO<sub>2</sub></b>	<b>1,085.5</b>	<b>1,303.8</b>	<b>1,133.6</b>
Electric energy- Market based (Scope 2)	tCO <sub>2</sub>	1,167.5	1,324.7	1,253.2

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## 4.3 Social field

### 4.3.1 Material topics

Based on the analysis conducted (for any details please refer to the introduction of this chapter), the material social topics for the Group appear to be linked to the following aspects:

- business ethics;
- social and economic compliance;
- privacy protection.

It should be noted that these non-financial topics were not impacted by the pandemic.

### 4.3.2 Risks

The main risks identified in the social field, which may be relevant in the perspective of the pursuit of our long-term business strategy, are attributable to:

- reputational risks, for example related to the transparency with which information is transmitted to the consumers by the Group, to the protection of consumers' and customers' privacy as well as market policies (e.g. anti-competitive behavior);
- compliance and legal risks, due to the failure to respect regulatory and fiscal obligations, also due to unfair competition and other behaviors which involve penalties under the current Italian and European regulations (e.g. insider trading). According to the 231 Model adopted by the Group, concerning the potential of industry and commerce disruption crimes, we notice that the activities that can be considered as "sensitive" are those related to negotiations with current or potential clients; with reference to potential market abuse crimes, the sensitive areas of activity concern the handling of confidential, privileged and price sensitive information.

In response to such risks, the Group has developed and implemented specific internal policies and procedures aimed at the operational management of these areas and described below. These tools, together with those required by current legislation, guarantee organizational and management controls in terms of business ethics, compliance with social and economic laws and regulations and privacy safeguard.

In 2019, given the Group's sensitivity to privacy issues, the Issuer and most of the companies of the BPO division, despite the absence of legal obligations in this regard, have appointed a data protection officer, who is responsible for monitoring, assessing and expressing opinions in relation to the management of the processing of personal data of the companies in which he has been appointed, ensuring compliance with European and national privacy regulations. For the role of data protection officer, an independent specialized company has been appointed, which is deemed to have the necessary qualifications and skills.

### 4.3.3 Policies adopted and/or practiced

The Group, as indicated in its Ethical Code, ensures the respect of legality, impartiality, honesty and confidentiality standards, established by company regulations. The Ethical Code also provides a set of standards related to privacy and the protection of confidential information, and to the proper use of available electronic devices, that all employees and collaborators must comply with. Furthermore, always based on the Ethical Code, all relationships with competitors are characterized by loyalty and

correctness and the Group disapproves any kind of agreement with competitors in order to fix prices, to manipulate or split markets or clients, to boycott clients, to try to unfairly monopolize a market or to commit to other actions or agreements which would limit or put restrictions on competition.

#### 4.3.4 Model

Some of these standards related to the privacy and the protection of confidential information are translated in more operating terms by the internal documentation related to policies and IT security procedures. This documentation defines the Information Security Management System (“ISMS”), adopted by the Group according to the guidelines of regulation ISO/IEC 27001, and it describes how we pursue our aims for information security. This document is available to all employees through the institutional website and to interested third parties, on explicit request, in PDF or paper format. The review process is managed by the Internal Audit function in coordination with the IT Function, and the review of the ISMS occurs at least annually or concurrently with significant changes.

In 2019, the Group approved the publication of the final version of the Integrated Management System documents, including the procedure: “Data Breach Management and Communication Process”, which aims to provide to the Group the information and tools to fulfil its obligations provided by GDPR (in this case, Articles 33 and 34) in the event of personal data violation.

As part of the protection of privacy and in line with the Group’s management approach, Agenzia Italia S.p.A. has adopted an information security policy prepared in compliance with the requirements of ISO 27001:2013. The Policy defines the framework of principles, guidelines and rules, including roles and responsibilities, that must be adopted for the security of information of Agenzia Italia S.p.A.. The scope of application of the policy coincides with the perimeter of the ISMS. In compliance with the provisions of the national transposition of the EU Regulation 2016/679, Agenzia Italia S.p.A. has also adopted a policy dedicated to the personal data privacy management. Finally, Agenzia Italia S.p.A. has adopted a procedure dedicated to the management of data breaches, which defines the processes, operating methods and responsibilities with which to manage any incidents relating to information security.

#### 4.3.5 Performance indicators<sup>6</sup>

During the years ended December 31, 2018, 2019 and 2020 no complaints were received from the public authorities for the non-compliance with privacy laws.

During the years ended December 31, 2018, 2019 and 2020 the Group did not receive penalties related to non-compliance with laws and regulations in the social and economic field.

During the years ended December 31, 2018, 2019 and 2020 there were no ongoing or completed legal actions for anti-competitive behaviors or violations of antitrust laws.

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<sup>6</sup> It should be noted that the materiality threshold for these cases is Euro 10 thousand.



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## 4.4 Human resources

### 4.4.1 Material topics

Based on the analysis conducted (for any details please refer to the introduction of this chapter 4), the personnel management topic resulted as material for the Group.

### 4.4.2 Risks

The main risks identified in the human resources field, which may be relevant in the perspective of the pursuit of our long-term business strategy, are attributable to:

- operating risks, linked in particular to a possible high turnover or lack of attraction of talents, in a business where the human factor is key for the production of the service itself;
- compliance risks, due to the failure to respect regulatory obligations with reference to employment laws. Such events could expose the companies of the Group to penalties and also criminal proceedings, (e.g. crimes included in the 231 Model);
- risks linked to the Covid-19 pandemic, which could limit the operations of the Group entities.

In order to manage the potential critical issues arising from these risk factors, Group companies promote behavior and practices that guarantee correct personnel management, in line with the principles defined in the Ethical Code. In particular, to manage the risk of retention failure, the Group adopts measures aimed at increasing the well-being and comfort of employees (for example, access to a carpooling platform for the Cagliari office, the possibility of converting the productivity bonus into welfare services for the main Italian companies of the Group). In addition, the Group organizes specific corporate events aimed at ensuring the loyalty of its employees and at managing the risk of a possible lack of attraction of talents, also through participation in external events that can increase their visibility.

### 4.4.3 Policies adopted and/or practiced

The Group, as indicated in the Ethical Code, respects and protects the dignity, health, safety and privacy of its employees, informing them, at time of hiring and after any change in the production processes, regarding their rights as well as the risks in which they may incur in carrying out their work performance. The Group protects, in particular, the physical and moral integrity of its employees and collaborators, ensuring working conditions that respect individual dignity, in compliance with the current regulations about employee safety and health. The Group supervises in order that no violence or psychological coercion acts, as well as any behavior that damages the individual dignity occur.

With regard to the Covid-19 pandemic, the Group has prepared procedures to ensure the health and safety of its employees and collaborators in the workplace. These procedures have been brought to the attention of all employees, collaborators and external visitors, aimed at dealing with the emergency, and containing all the measures and precautions adopted for this purpose. Among prevention and protection measures provided for in the procedures, in particular there is the use of smart working, which is strongly recommended by the Group.

#### 4.4.4 Model

As indicated in the general description in the introduction of Ch. 3, currently there is no a centralized model and the operating management of the human resources topics (e.g. personnel management and related topics, turnover, etc.) is delegated to the individual companies of the Group.

In the area of personnel management, subsidiary Agenzia Italia S.p.A. has adopted a corporate policy that regulates the entire process of human resources management. In particular, the policy defines the guidelines for the process of selecting, hiring and developing personnel up to the time of termination of the employment contract.

#### 4.4.5 Performance indicators

As of December 31, 2020, the Group employs 2,310 resources, up 21% if compared to the previous year. Such increase is mainly attributable to the acquisition of the Lercari Group and SOS Tariffe S.r.l., occurred in 2020. During 2020, against the termination of 406 employees, the employees hired were 551.

New hires and terminations by gender*							
	Unit of measurement	New hires			Terminations		
		2020	2019	2018	2020	2019	2018
Men	n.	222	183	159	145	182	146
	%	10%	10%	9%	6%	10%	8%
Women	n.	329	327	316	261	293	290
	%	14%	17%	17%	11%	15%	16%
Total	n.	551	510	475	406	475	436
	%	24%	27%	26%	18%	25%	24%
New hires and terminations by age*							
< 30 years old	n.	341	329	300	219	275	231
	%	15%	17%	16%	11%	14%	13%
30 ≤ x ≤ 50 years old	n.	205	180	174	180	189	195
	%	9%	9%	9%	9%	10%	11%
> 50 years old	n.	5	1	1	7	11	10
	%	0%	0%	0%	0%	1%	1%
Total	n.	551	510	475	406	475	436
	%	24%	27%	26%	21%	25%	24%

New hires and terminations by Country*							
Italy	n.	372	293	250	242	262	216
	%	16%	15%	14%	10%	14%	12%
Romania	n.	179	217	225	163	213	220
	%	8%	11%	12%	7%	11%	12%
Albania	n.	0	0	0	1	0	0
	%	0%	0%	0%	0%	0%	0%
Total	n.	551	510	475	406	475	436
	%	24%	27%	26%	18%	25%	24%

\* The percentage rates reported in the table refer to the ratio between the new hires/ terminations, in the reference category, and the total number of employees as of December 31. Italian data for 2019 and 2018 also include Spanish data (represented by a negligible number of employees). The total percentage may differ from the sum of the partial percentages because of rounding. It should be noted that the figures reported differ from those published in the previous reports as in this report, external workers (e.g. "somministrati") have been excluded (equal to 91 in 2019 and 62 in 2018).

The number of employees, as of December 31, 2020 and 2019, divided by employment contract type, gender and country is reported below:

Employees, divided by employment contract type, gender and country*									
	2020			2019			2018		
	Perm.	Temp.	Total	Perm.	Temp.	Total	Perm.	Temp.	Total
Men	749	56	805	595	25	620	561	37	598
Women	1.407	98	1.505	1.244	51	1.295	1.182	61	1.243
<b>Total</b>	<b>2.156</b>	<b>154</b>	<b>2.310</b>	<b>1.839</b>	<b>76</b>	<b>1.915</b>	<b>1.743</b>	<b>98</b>	<b>1.841</b>
<i>Of which in Italy</i>	<i>1.534</i>	<i>142</i>	<i>1.676</i>	<i>1.364</i>	<i>71</i>	<i>1.435</i>	<i>1.280</i>	<i>85</i>	<i>1.365</i>
<i>Of which in Romania</i>	<i>484</i>	<i>12</i>	<i>496</i>	<i>475</i>	<i>5</i>	<i>480</i>	<i>463</i>	<i>13</i>	<i>476</i>
<i>Of which in Albania</i>	<i>138</i>	<i>0</i>	<i>138</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>

\* Italian data for 2019 and 2018 also include Spanish data (represented by a negligible number of employees). It should be noted that the figures reported differ from those published in the previous reports as in this report, external workers (e.g. "somministrati") have been excluded (equal to 91 in 2019 and 62 in 2018).

The number of employees, as of December 31, 2020, 2019 and 2018, divided by employment contract type and gender is reported below:

Employees, divided by employment contract type and gender*									
	2020			2019			2018		
	Full Time	Part Time	Total	Full Time	Part Time	Total	Full Time	Part Time	Total
Men	786	19	805	605	15	620	576	22	598



Women	1.368	137	1.505	1.155	140	1.295	1.104	139	1.243
<b>Total</b>	<b>2.154</b>	<b>156</b>	<b>2.310</b>	<b>1.760</b>	<b>155</b>	<b>1.915</b>	<b>1.680</b>	<b>161</b>	<b>1.841</b>

*\* It should be noted that the figures reported differ from those published in the previous reports as in this report, external workers (e.g. "somministrati") have been excluded (equal to 91 in 2019 and 62 in 2018).*

100% of the employees as of December 31, 2020, 2019 and 2018 are covered by collective bargaining agreements.

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## 4.5 Respect of human rights field

### 4.5.1 Material topics

Based on the analysis conducted (see the introduction to this chapter 4 for details), the material topic for the Group in the area of human rights protection is non-discrimination.

Respect for human rights is one of the principles on which all the Group's behaviors are based. The Ethical Code of the Group regulates the respect of values such as the protection of human resources, equal opportunities, meritocracy, intolerance towards any form of discrimination and the development of a positive working environment, and its application is extended to all employees and third parties having relations with the Group.

It should be noted that these non-financial topics were not impacted by the pandemic.

### 4.5.2 Risks

The main risks identified with reference to the respect of human rights, which may be relevant in the perspective of the pursuit of our long-term business strategy, are attributable to:

- reputational risks, in case of potential violations (real or presumed) of universally recognized human rights, in particular possible discrimination cases, related to the direct or indirect workforce (supply chain) or to the local community where the Group operates. The failure to respect human rights could materialize, for example, in child labor, forced labor, or strongly negative impact on the local communities;
- operating risks, related to a poor management of any issues about real or presumed abuse of the human rights;
- legal and compliance risks, in case of management of any litigations, linked to the respect of human rights.

With regard to these risks, in addition to the Code of Ethics which defines the principles of conduct and guidelines relating to the areas mentioned by the Italian Legislative Decree 254/2016, the Group has not adopted specific management methods, as a result of the high level of control that characterizes the Countries where the Group companies carry out their activities.

### 4.5.3 Policies adopted and/or practiced

The Group, as indicated in the Ethical Code of the Group, of Agenzia Italia S.p.A. and Eagle & Wise Service S.r.l., avoids any kind of discrimination based on gender or sexual orientation, on race, on national origin, on geographical origin, on religion, as well as on any other potential parameters established by the current laws.

### 4.5.4 Model

Please refer to the general description in the introduction of the Ch. 4, as currently no specific organizational structures for management of topics related to the respect of human rights have been implemented by the Group.

### 4.5.5 Performance indicators

With reference to respect for human rights, during financial years ended December 31, 2018, 2019 and 2020, no episodes of discrimination or violation of human rights have emerged.

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With reference to the composition of the Issuer's Board of Directors, it should be noted that it is composed of 6 men and 4 women, in compliance with the gender balance required by law and by the Code of Conduct applicable to listed companies.

## 4.6 Anti-corruption field (active and passive)

### 4.6.1 Material topics

Based on the analysis conducted (for any details please refer to the introduction of this chapter 4), the anti-corruption topic appears to be material for the Group, not so much for the occurrence of any corruption events, as for the intrinsic relevance of the issue, also in relation to the nature of some business where the activities of some companies of the Group are focused.

It should be noted that these non-financial topics were not impacted by the pandemic.

### 4.6.2 Risks

In the anti-corruption field, the main risks which may be relevant in the perspective of the pursuit of our long-term business strategy, are linked to the commission of corruption acts from/toward the Public Administration and from/toward private parties.

In particular, such risks can be attributable to:

- reputational risks;
- operating risks;
- compliance risks and subsequent exposure of the organization to criminal penalties in the countries where there is a regulation against corruption.

The risks linked to corruption can involve several business processes and they are identified in relation to the types of crimes predicted by the L.D. n. 231/2001, such as for example bribery crimes, wrongful induction to give or promise advantages, the instigation to corruption, the corruption for an official act, etc.

In response to these risks, the Group has developed and implemented specific internal policies and procedures aimed at the operational management of these areas and described below. These tools guarantee, together with those required by current legislation, the necessary organizational and management controls.

### 4.6.3 Policies adopted and/or practiced

The Ethical Code establishes the ethical criteria that inspire the Group, and the principles of legality, loyalty, fairness and transparency that the Group commits to respect, with specific regard to the purpose of preventing corruption and similar crimes, pursuant to 231 Model (please refer to the following section).

### 4.6.4 Model

Different types of potential crimes related to corruption in its various forms (e.g. crimes in the relations with the Public Administration, induction not to make statements or to make false statements to the judicial authority, corruption between private parties) are at the center of the structure of the 231 Model. In order to prevent such crimes, the 231 Model establishes the behavioral standards to respect in the dealings with the Public Administration, in the relations with employees and with goods and services suppliers and in the context of high-risk activities with regard to corporate crimes, coherently with the business ethical standards provided by the Ethical Code of the Group. Generally, for all those subjects that, for any reasons, operate in the context of

“sensitive” activities on behalf or for the interest of the Group, it is forbidden to put in place, to collaborate or to keep behaviors such that, individually or collectively considered, integrate or can integrate, directly or indirectly, the types of crimes predicted by the 231 Model. It is also prohibited to put in place behaviors that lead to situations of conflict of interest versus representatives of the Public Administration.

The Supervisory Body is delegated with the task of evaluating the effectiveness of the procedures and the compliance with the requirements of the 231 Model pertaining the prevention of the crimes described above.

It should also be noted that the Group has a purchasing procedure, which governs the processes relating to purchases, gifts and hiring, in order to avoid possible corruption. This procedure is mentioned in both the Ethical Code and the 231 Model.

Furthermore, the subsidiary Centro Processi Assicurativi S.r.l., a company belonging to the Insurance BPO business line, which provides services for the outsourced management of insurance claims in favor of various public entities, adopted an anti-corruption regulation aimed at preventing possible corruption offences and at bringing to light potential conflicts of interest within its own organization with regard to persons who have spending and decision-making powers within public entities, including potential customers.

As part of the fight against corruption, Agenzia Italia S.p.A. has also adopted a specific internal regulation governing relations between the company and the Public Administration, with the aim of defining the operating procedures, responsibilities and internal control systems through which such relations take place.

#### **4.6.5 Performance indicators**

With regard to potential risks related to corruption, the Group considered it necessary to pay attention to the Insurance BPO business line, which provides a part of its services to the Public Administration and public entities, by adopting a procedure aimed at identifying potential risk items (e.g. potential conflicts of interest). In addition, the Group adopted specific internal procedures for the company Agenzia Italia S.p.A. in the context of relations with the Public Administration.

With regard to the fight against corruption, during the financial years ended December 31, 2018, 2019 and 2020, no cases of corruption have not been detected.



## 5. METHODOLOGICAL NOTE

This non-financial information of the Group is compliant to the requirements of the Legislative Decree n. 254/2016 about the disclosure obligation regarding the non-financial information for large public-interest entities. Such information aims to ensure the comprehension of the Group activity, of its performance, of its results and of the impact produced covering the relevant environmental, social, human resources, respect of human rights and active and passive anti-corruption topics, that are considered relevant taking into account the activities and the characteristics of the Group.

### 5.1 The reporting scope and standard

This non-financial information is related to the year 2020 (from January 1, to December 31), coherently with the reference period of the Consolidated Financial Report, and it also includes, if available, the non-financial performance indicators of 2018 and 2019, to provide a comparison with the previous years. The reporting scope, coherently with the requirements of the Decree, corresponds with the one used for the Consolidated Financial Report (please refer to the Organizational Structure of the Group as of December 31, 2020, reported in the par. 3.1.4 “Organizational Structure”), and includes the entities consolidated line-by-line for the Financial Report.

Below is reported a table showing the correlation between the areas of the Decree and the material topics identified by the Group, reporting in correspondence with each of them the related reporting perimeter and any limitations:

Areas of the Decree	Material topics	Topic perimeter		Perimeter limitations	
		Internal	External	Internal	External
Environment	Energy consumptions	Group	-	Reporting not extended to the operating offices with less than 10 employees as of December 31	-
	Atmospheric emissions (greenhouse gas)	Group	-		-
Social	Privacy protection	Group	-	-	-
	Social and economic compliance	Group	-	-	-
	Business Ethic	Group	-	-	-
Personnel	Personnel management	Group	-	-	-
	Training	Group	-	-	-
Human Rights	Non-discrimination	Group	-	-	-
Anti-corruption	Fight against corruption	Group	-	-	-

The reporting standard adopted by the Group for the elaboration of this report, are the GRI Sustainability Reporting Standards published in 2016 by Global Reporting Initiative (GRI); in particular, this document has been prepared according to the option “In accordance – Core” of GRI Standards.

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## 5.2 The reporting process and the calculation methods

The qualitative and quantitative information included in this NFI were selected by a specific team of the Group, based on the materiality analysis (for further details please refer to the chapter 3 in the “Material topics” section) and they were collected through specifically defined data collection sheets, in order that the indicators were aligned with the disclosure of the GRI Standards.

In this document, where necessary, a specific note has been included to indicate changes in 2019 and 2018 performance data; in some cases, comparative data for new indicators introduced with this NFI have been reported.

The NFI is subject to limited review by EY S.p.A. in accordance with the provisions of L.D. 254/2016.

Below we report the main calculation methods and assumptions for the non-financial performance indicators reported in this NFI, in addition to what previously indicated.

### Energy consumption and greenhouse gas emissions

The conversion factors used to harmonize energy consumption come from the table “UK Government GHG Conversion Factors for Company Reporting – Fuel properties” of the DEFRA, for years 2018, 2019 and 2020.

For the calculation of the greenhouse gas emissions we used a prudential estimates approach. In particular, the greenhouse gas emissions were calculated in the following way:

- direct emissions (Scope 1), expressed in terms of equivalent CO<sub>2</sub>: for the emissions related to the consumption of natural gas, diesel and gasoline fuel, we used the emission factors reported in “UK Government GHG Conversion Factors for Company Reporting – Fuel properties” of the DEFRA, in the 2018, 2019 and 2020 editions;
- indirect energetic emissions (Scope 2), expressed in terms of CO<sub>2</sub>: for the calculation of the emissions related to electric energy we considered the factors, for each country, reported in the table “*Tabella 49 - Principali indicatori socio-economici ed energetici*”, published by Terna in the section “*Confronti Internazionali*”, and available in their most recent version (2018 data for the current year) for the Location-based approach and the “Residual Mix” published by the Association of Issuing Bodies in 2019 for the Market-based approach.

### Personnel management

The new hire and termination rates were calculated with respect to the total number of employees as of December 31 for the three years subject to the disclosure.

### 5.3 GRI Content Index

GRI Standards	Disclosure	Paragraph	Omission
<b>GRI 102: General Disclosures 2016</b>			
<b>GRI 102: General Disclosures 2016</b>	<b>Organizational profile</b>		
	102-1 Name of the organization	3.1	
	102-2 Activities, brands, products and services	3.1	
	102-3 Location of headquarters	<b>Error! Reference source not found.</b>	
	102-4 Location of operations	<b>Error! Reference source not found.</b>	
	102-5 Ownership and legal form	<b>Error! Reference source not found.</b>	
	102-6 Markets served	<b>Error! Reference source not found.</b>	
	102-7 Scale of the organization	<b>Error! Reference source not found.</b>	
	102-8 Information on employees and other workers	4.4.5	
	102-9 Supply chain	<b>Error! Reference source not found.</b>	
	102-10 Significant changes to the organization and its supply chain	<b>Error! Reference source not found.</b>	
	102-11 Precautionary Principle or approach	The Group does not apply the precautionary approach to the management of non-financial issues.	
	102-12 External initiatives	3.2	
	102-13 Membership of associations	<b>Error! Reference source not found.</b>	
	<b>Strategy</b>		
102-14 Statement from senior decision-maker	<b>Error! Reference source not found.</b>		
102-15 Key impacts, risks, and opportunities	4.1.1-4.1.2		
<b>Ethics and Integrity</b>			
102-16 Values, principles, standards and norms of behavior	3.1, <b>Error! Reference source not found.</b>		
<b>Governance</b>			

102-18 Governance structure	Error! Reference source not found.	
<b>Stakeholder engagement</b>		
102-40 List of stakeholder groups	Error! Reference source not found.	
102-41 Collective bargaining agreements	4.4.4	
102-42 Identifying and selecting stakeholders	Error! Reference source not found.	
102-43 Approach to stakeholder engagement	Error! Reference source not found.	
102-44 Key topics and concerns raised	Error! Reference source not found.	
<b>Reporting practice</b>		
102-45 Entities included in the consolidated financial statements	Error! Reference source not found.	
102-46 Defining report content and topic Boundaries	Error! Reference source not found.	
102-47 List of material topics	Error! Reference source not found.	
102-48 Restatements of information	Error! Reference source not found.-4.4.5	
102-49 Changes in reporting	Error! Reference source not found.	
102-50 Reporting period	Error! Reference source not found.	
102-51 Date of most recent report	Error! Reference source not found.	
102-52 Reporting cycle	Error! Reference source not found.	
102-53 Contact point for questions regarding the report	Error! Reference source not found.	
102-54 Claims of reporting in accordance with the GRI	Error!	

	Standards	Reference source not found.	
	102-55 GRI Content Index	Error! Reference source not found.	
	102-56 External assurance	Error! Reference source not found.	
<b>GRI 200: Economic Standard Series</b>			
<b>Anti-corruption</b>			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its boundary	Error! Reference source not found., Error! Reference source not found.	
	103-2 The management approach and its components	Error! Reference source not found.	
	103-3 Evaluation of the management approach	Error! Reference source not found..5	
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Error! Reference source not found..5	
<b>Anti-competitive Behavior</b>			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its boundary	Error! Reference source not found., Error! Reference source not found.	
	103-2 The management approach and its components	Error! Reference source not found.	
	103-3 Evaluation of the management approach	Error! Reference source not found..5	
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Error! Reference source not found..5	
<b>GRI 300: Environmental Standards Series</b>			
<b>Energy</b>			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its boundary	Error! Reference source not found.,	

		Error! Reference source not found.	
	103-2 The management approach and its components	Error! Reference source not found.	
	103-3 Evaluation of the management approach	Error! Reference source not found..5	
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Error! Reference source not found..5	
<b>Emissions</b>			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its boundary	Error! Reference source not found., Error! Reference source not found.	
	103-2 The management approach and its components	Error! Reference source not found.	
	103-3 Evaluation of the management approach	Error! Reference source not found..5	
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Error! Reference source not found..5	
	305-2 Energy indirect (Scope 2) GHG emissions	Error! Reference source not found..5	
<b>GRI 400: Social Standards Series</b>			
<b>Employment</b>			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its boundary	Error! Reference source not found., Error! Reference source not found.	
	103-2 The management approach and its components	Error! Reference source not found.	
	103-3 Evaluation of the management approach	Error! Reference source not found...4	
GRI 401: Employment	401-1 New employee hires and employee turnover	Error!	

2016		Reference source not found..4	
<b>Non-discrimination</b>			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its boundary	Error! Reference source not found., Error! Reference source not found.	
	103-2 The management approach and its components	4.5	
	103-3 Evaluation of the management approach	4.5.5	
GRI 406-1	406-1 Incidents of discrimination and corrective actions taken	4.5.5	
<b>Customer Privacy</b>			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its boundary	Error! Reference source not found., Error! Reference source not found.	
	103-2 The management approach and its components	Error! Reference source not found.	
	103-3 Evaluation of the management approach	Error! Reference source not found..5	
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Error! Reference source not found..5	
<b>Socioeconomic Compliance</b>			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its boundary	Error! Reference source not found., Error! Reference source not found.	
	103-2 The management approach and its components	Error! Reference source not found.	
	103-3 Evaluation of the management approach	Error! Reference source not found..5	
GRI 419: Socioeconomic Compliance 2016	419-1 Non-compliance with laws and regulations in the social and economic area	Error! Reference source not found..5	

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For further information about this document, please refer to:  
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## Independent auditors' report on the consolidated disclosure of non-financial information in accordance with Article 3, par. 10, of Legislative Decree 254/2016 and with Article 5 of Consob Regulation adopted with Resolution n. 20267 of 18<sup>th</sup> January 2018

(Translation from the original Italian text)

To the Board of Directors of  
Gruppo MutuiOnline S.p.A.

We have been appointed to perform a limited assurance engagement pursuant to Article 3, paragraph 10, of Legislative Decree 30 December 2016, n. 254 (hereinafter "Decree") and article 5 of Consob Regulation adopted with Resolution 20267/2018, on the consolidated disclosure of non-financial information of Gruppo MutuiOnline S.p.A. and its subsidiaries (hereinafter the "Group" or "MutuiOnline Group") for the year ended on 31<sup>st</sup> December 2020 in accordance with article 4 of the Decree and approved by the Board of Directors on 16<sup>th</sup> March 2021 (hereinafter "DNF").

### Responsibilities of Directors and Board of Statutory Auditors for the DNF

The Directors are responsible for the preparation of the DNF in accordance with the requirements of articles 3 and 4 of the Decree and the "Global Reporting Initiative Sustainability Reporting Standards" defined by GRI - Global Reporting Initiative (hereinafter "GRI Standards"), identified by them as a reporting standard.

The Directors are also responsible, within the terms provided by law, for that part of internal control that they consider necessary in order to allow the preparation of the DNF that is free from material misstatements caused by fraud or not intentional behaviors or events.

The Directors are also responsible for identifying the contents of the DNF within the matters mentioned in article 3, par. 1, of the Decree, considering the business and the characteristics of the Group and to the extent deemed necessary to ensure the understanding of the Group's business, its performance, its results and its impact.

The Directors are also responsible for defining the Group's management and organization business model, as well as with reference to the matters identified and reported in the DNF, for the policies applied by the Group and for identifying and managing the risks generated or incurred by the Group.

The Board of Statutory Auditors is responsible, within the terms provided by the law, for overseeing the compliance with the requirements of the Decree.

### Auditors' independence and quality control

We are independent in accordance with the ethics and independence principles of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, based on fundamental principles of integrity, objectivity, professional competence and diligence, confidentiality and professional behavior. Our audit firm applies the International Standard on Quality Control 1 (ISQC Italia 1) and, as a result, maintains a quality control system that includes documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable laws and regulations.

## Auditors' responsibility

It is our responsibility to express, on the basis of the procedures performed, a conclusion about the compliance of the DNF with the requirements of the Decree and of the GRI Standards. Our work has been performed in accordance with the principle of "International Standard on Assurance Engagements ISAE 3000 (Revised) - Assurance Engagements Other than Audits or Reviews of Historical Financial Information" (hereinafter "ISAE 3000 Revised"), issued by the International Auditing and Assurance Standards Board (IAASB) for limited assurance engagements. This principle requires the planning and execution of work in order to obtain a limited assurance that the DNF is free from material misstatements. Therefore, the extent of work performed in our examination was lower than that required for a full examination according to the ISAE 3000 Revised ("reasonable assurance engagement") and, hence, it does not provide assurance that we have become aware of all significant matters and events that would be identified during a reasonable assurance engagement.

The procedures performed on the DNF were based on our professional judgment and included inquiries, primarily with company's personnel responsible for the preparation of the information included in the DNF, documents analysis, recalculations and other procedures in order to obtain evidences considered appropriate.

In particular, we have performed the following procedures:

1. analysis of the relevant matters in relation to the activities and characteristics of the Group reported in the DNF, in order to assess the reasonableness of the selection process applied in accordance with the provisions of article 3 of the Decree and considering the reporting standard applied;
2. analysis and evaluation of the criteria for identifying the consolidation area, in order to evaluate its compliance with the provisions of the Decree;
3. comparison of the economic and financial data and information included in the DNF with those included in the MutuiOnline Group's consolidated financial statements;
4. understanding of the following aspects:
  - o Group's management and organization business model, with reference to the management of the matters indicated in the article 3 of the Decree;
  - o policies adopted by the Group related to the matters indicated in the article 3 of the Decree, results achieved and related key performance indicators;
  - o main risks, generated or suffered related to the matters indicated in the article 3 of the Decree.

With regard to these aspects, we obtained the documentation supporting the information contained in the DNF and performed the procedures described in item 5. a) below

5. understanding of the processes that lead to the generation, detection and management of significant qualitative and quantitative information included in the DNF.  
In particular, we have conducted interviews and discussions with the management of Gruppo MutuiOnline S.p.A. and with the personnel of Eagle & Wise Service S.r.l. and we have performed limited documentary evidence procedures, in order to collect information about the processes and procedures that support the collection, aggregation, processing and transmission of non-financial data and information to the management responsible for the preparation of the DNF.

Furthermore, for significant information, considering the Group activities and characteristics:

- at Group level
  - a) with reference to the qualitative information included in the DNF, and in particular to the business model, policies implemented and main risks, we carried out inquiries and acquired supporting documentation to verify its consistency with the available evidence;
  - b) with reference to quantitative information, we have performed both analytical procedures and limited assurance procedures to ascertain on a sample basis the correct aggregation of data.
- For the company Eagle & Wise Service S.r.l., that we have selected based on its activities, relevance to the consolidated performance indicators and location, we performed remote interviews during which we have had discussions with management and have obtained evidence about the appropriate application of the procedures and the calculation methods used to determine the indicators.

## Conclusion

Based on the procedures performed, nothing has come to our attention that causes us to believe that the DNF of the MutuiOnline Group for the year ended on 31<sup>st</sup> December 2020 has not been prepared, in all material aspects, in accordance with the requirements of articles 3 and 4 of the Decree and the GRI Standards.

Milan, 31<sup>st</sup> March 2021

EY S.p.A.  
Signed by: Lorenzo Secchi (Auditor)

*This report has been translated into the English language solely for the convenience of international readers.*