

expri^{ia}

2020 Consolidated Non- financial Declaration

in accordance with Italian Legislative Decree 254/2016





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Dear stakeholder,

2020 was a year of great challenges for everyone, all around the world. Nevertheless, we remained steadfast in our commitment to pursuing the issues we hold dear, such as social and environmental sustainability and the well-being of employees. It is an honour for us to share this document with our stakeholders, in which we report on and confirm our commitment to more sustainable and transparent management of our company, to the benefit of the social context within which it operates. We believe that all keeping you informed of all the steps we undertake is crucial for fostering a spirit of sharing and trust.

In the face of the pandemic, climate change, the extinction of many animal and plant species, the still wide income disparities and resulting social conditions between many parts of the world, the fruits of our actions seem a mere drop in the ocean, but we believe that if everyday behaviour is geared towards sustainability, understanding alternative ways of preserving or improving our lifestyle is far from a pointless exercise. The concepts of gender and income inequalities, literacy rate, access to education, life expectancy and the reduction of poverty are an essential part of the formula of sustainability.

At Exprivia, in a spirit of awareness and resilience, we have consolidated the results achieved over previous years. What sets our ICT services apart is our level of technological expertise and speed in offering innovative solutions in a number of market sectors. As part of our strategic plan to reinforce our business, we have decided to expand our know-how in the fields of artificial intelligence, the Cloud and cybersecurity. The latter has grown incredibly rapidly since late 2019, and we have become a national benchmark thanks to our quarterly report on cybersecurity in Italy. The ongoing search for innovation in our solutions and in the expertise of our colleagues lays the foundations for sustainability, or rather the satisfaction of our customers, which is what enables us to remunerate our shareholders and employees.

We have a strong connection with the areas we live in, and our responsibility thus also extends to all aspects of social life. We support local communities through projects, initiatives and donations in training, research, culture and sport. We maintain close partnerships with the academic world and the organisations associated with it, with professional bodies and the trade union, with which we maintain regular dialogue to monitor the activities implemented with respect to our colleagues. We support events and social gatherings based on the topic of culture, aware that education and culture can improve the entire company.

Our commitment, attention and sense of responsibility towards our stakeholders are confirmed by the continuous focus on and updating of the indications in the Code of Ethics, the rules of conduct as suggested by the Corporate Governance Code of Borsa Italiana and by the whistleblowing platform.

During the difficult period characterised by the global pandemic, Exprivia's approach has been based above all on protecting people by tackling the difficulties faced by our country. We have taken steps to protect colleagues and their families by offering everyone the chance to work from home (*smart-working*), sanitise company premises that must be occupied, and maintain corporate cohesion through constant communication, facilitated by technology.

2020 was also the year of Italtel's crisis. Convinced of the validity of the business plan that underpinned our decision to integrate Exprivia with Italtel, we worked strenuously to identify solutions for relaunching the company. On December 31, 2020, Italtel's board of directors voted to accept the offer of another industrial entity, which presented a project that was certainly an alternative to ours and that placed Italtel at the centre of its traditional business. On February 5, 2021, Italtel filed an application for a composition with creditors based on this binding offer, which the Court of Milan admitted by decree





on March 11, 2021. On the basis of these events and the opinions gathered from leading accounting and legal advisors, Exprivia's Board of Directors was able to certify the loss of control of Italtel at 31 December 2020.

Today it is difficult to make medium-term forecasts. What we are certain of is that we have started 2021 with an awareness of our strengths and with a financial structure that will allow us to make new investments for growth.

We will face the future with faith, bolstered by what we have constructed and by our staff, safe in the knowledge that we are leaving a rich heritage for future generations.

Domenico Favuzzi

Chairman and CEO

Exprivia SpA





Exprivia S.p.A.

subject to the management and co-ordination of Abaco Innovazione S.p.A.

Registered Office in Via Adriano Olivetti 11, Molfetta

Company Share Capital Euro 26,979,658.16 fully paid-up

Tax Code and Bari Register of Companies Number 00721090298 - Economic and Administrative Index Number BA-481202

Company with shares listed on the MTA of Borsa Italiana S.p.A.

Exprivia exercises Management and Coordination activities, pursuant to articles 2497 et seq. of the Italian Civil Code, exclusively over the companies belonging to the group wholly controlled by it.

For this purpose, the Board of Directors of Exprivia approved a **Regulation on the exercising of Management and Coordination activities** on 4 December 2017, which governs the mechanisms used by the Holding Company to determine the procedures for managing the necessary infra-group information flows and to carry out its management and coordination activities over the companies subject to it.

Disclaimer

With regard to Italtel S.p.A., please note that it is not one of the companies over which Exprivia exercises management and coordination activities.

Moreover, as communicated to the market on 30 April 2021, Exprivia's Board of Directors, also on the basis of the opinions rendered by its legal and accounting advisors, has certified the loss of control over Italtel SpA, pursuant to the international accounting standard IFRS 10, as a result of the resolution of Italtel's Board of Directors of 31 December 2020, which chose, as the best offer to support a proposal for composition, that of a third party, making Exprivia no longer exposed to the variable returns from Italtel.

In the draft financial statements as at 31.12.2020, the Issuer has therefore consolidated only Italtel's income statement items through IFRS 5.

Methodological notes

GRI indicators 102-1; 102-5; 102-45; 102-46; 102-50

This document is the '2020 Consolidated Non-Financial Declaration' of the **Exprivia Group** (hereinafter also "**the Group**"), a group of companies whose holding company is **Exprivia SpA** (hereinafter also "**Exprivia**"), a company listed on the MTA of Borsa Italiana, the Italian stock exchange, [XPR.MI]; it constitutes the fourth **Consolidated Non-Financial Declaration** drawn up in compliance with Italian Legislative Decree no. 254 of 30 December 2016 (hereinafter also "**Italian Legislative Decree no. 254/16**"), in "Implementation of Directive 2014/95/EU of the European Parliament and of the Council of 22 October 2014 amending Directive 2013/34/EU as regards disclosure of non-financial and diversity information by certain large undertakings and groups", which requires the submission of a non-financial declaration by public-interest entities (pursuant to article 16, paragraph 1 of Italian Legislative Decree no. 39 of 27 January 2010) and specifically in the capacity of a "company issuing securities admitted to trading on Italian and European Union regulated markets".

The 'consolidated non-financial declaration for 2020' (hereinafter, by way of brevity, the "Non-financial Declaration" or "NFD") should be considered an integration and supplement to the Annual Financial Report and additional documentation pertaining to the Group's 2020 consolidated financial statements (1 Jan. 2020 – 31 Dec. 2020). The document has therefore been drawn up in compliance with the provisions of Italian Legislative Decree no. 254/16. The Group drafted this

document in accordance with what was set out, on average, in the sustainability reports of the benchmark in the sector.

Moreover, with regard to the financial stress faced by Italtel, this document was revised qualitatively to ensure consistency between its content and the information provided prior to the approval, on 30 April 2021, of the Annual Financial Report at 31 December 2020 and the 2020 NFD. For more economic/financial details, see the 2020 Consolidated Financial Report of the Exprivia Group available on the website www.exprivia.it in the Corporate > Investor Relation > See all financial statements section.

The following criterion governs the reporting scope in the 'Environment, Health and Safety' chapter: the company offices, both in Italy and overseas, are considered **significant**, and therefore included within the reporting scope of this Declaration, **if they have a number of workstations equal to or greater than 30**. It was decided to use the number of workstations rather than the number of employees, since consumption is directly linked to the staff working at the office rather than those recruited at an office but working on customer premises.

The conversion factors used to convert the different energy quantities into GJ are taken from the Defra (UK Department for Environment, Food and Rural Affairs) database, indicating the conversion factors from Toe to GJ for various energy carriers updated to the period 2019-2020.

To convert the units of measurement of the various energy carriers used into TOE (e.g. LPG, diesel, etc.), the conversion coefficients used were those updated periodically by the FIRE (Italian Federation for the rational use of energy) in consideration of the evolving legislative and market context, as well as the MISE (Italian Ministry of Economic Development) Circular of 18/12/2014.

The emission factors used to calculate the CO₂ emissions shown in the NFD are as follows:

- **direct emissions** (scope 1): Standard parameters inferred from the UNFCCC national inventory for conversion for methane and LPG; to convert litres of diesel into t CO₂, the conversion factor used was that indicated in the Defra database updated to the period 2019–2020.
- **indirect energy emissions** (scope 2): for electricity acquired from the electricity grid, the conversion factor used was that calculated by ISPRA (Italian Institute for Environmental Protection and Research) in its report on greenhouse gas atmospheric emission factors in the Italian electricity sector and in the main European countries in 2020.

Disclaimer

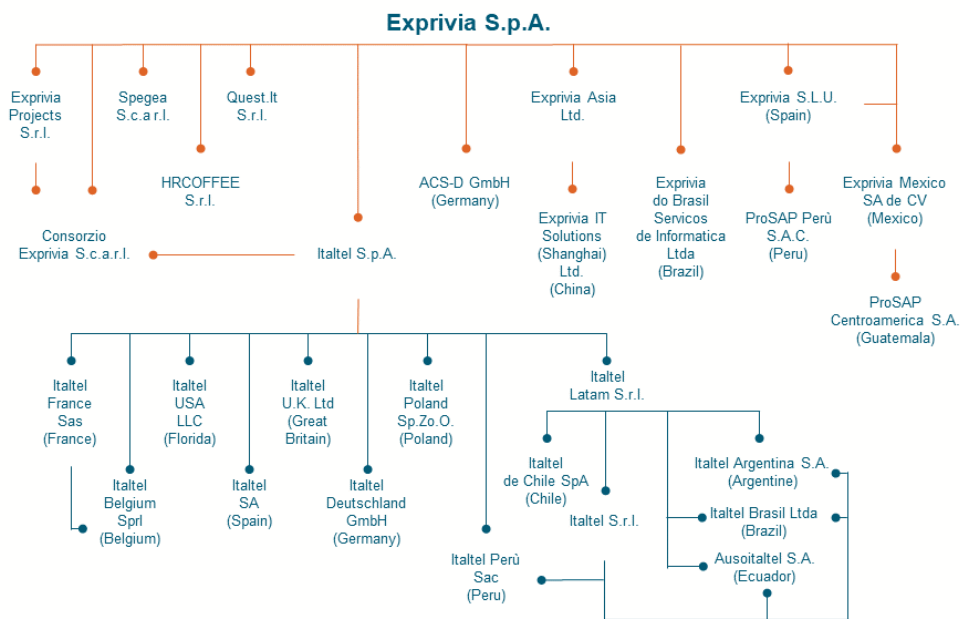
In view of the substantial change to the group's scope at the end of 2017, which involved the inclusion of the Italtel Group, the presentation of the figures and the information in this document are not, and cannot be, homogeneous.

The figures are presented in 'consolidated' form in relation to the group scope, as specified above, starting from reporting year 2018.

Where possible, 'information boxes' are available both for the two sub-groups (Exprivia and Italtel) and within the two, in relation to specific events of relevance to this document.

Reporting scope

The analysis and reporting scope for the purposes of Italian Legislative Decree no. 254/16 includes for this year, except where otherwise specified, all the companies belonging to the Exprivia Group as illustrated below in the ownership chart:



Reporting spheres

The NFD reports on aspects relating to the fight against active and passive corruption, the environment, HR management, social aspects and respect for human rights assessed as significant and material according to a specific and consolidated process, which takes into account the Group's specific activities, illustrated below in this document (see the 'Materiality analysis in relation to the business' section).

With regard to each topical reporting sphere, evidence is provided of the material nature of the aspect with respect to the Group's activities, the risks associated with it, the commitments and the results obtained and monitored by means of indicators capable of representing the operating results.

The data and information in this NFD refer to events which occurred in 2020, deriving from the company's business activities, significant on the basis of the materiality analysis and in compliance with Italian Legislative Decree no. 254/16. They are gathered and consolidated by the various reference units, using extractions from the company information systems, with the coordination of a senior manager reporting directly to the company management.

In this regard, it is hereby specified that the Group has adopted the indicators envisaged by the GRI Sustainability Reporting Standards (hereinafter, the "GRI Standards" or "GRI") issued by the Global Reporting Initiative in 2016, using the 'GRI-referenced' approach. Reference to the GRI indicators may be found in the 'GRI link table'.

This document has been subject to a compliance opinion by the independent auditors, BDO Italia S.p.A. which issued the 'Report by the Independent Auditors'.

Exprivia's Board of Directors approved the NFD on 30 April 2021. The NFD is published in the 'Corporate Social Responsibility' section of the holding company's website (www.exprivia.it).





1. An international group enabling digital transformation processes

The Exprivia Group is an international business group specialised in Information and Communication Technology. It uses digital technologies to steer its customers' business change drivers.

The Group stands out for its reliability in managing complex projects through the connection and integration of vertical and horizontal skills and the ability to create solutions that are easy to use and update, as they are based on continuous research and innovation.

Exprivia SpA has been listed on the Italian Stock Exchange since 2000, in the MTA (XPR) segment.

The founding concepts of our vision

Future

The future is the point towards which we orient ourselves in defining scenarios, processes and goals for ourselves and our customers.

Connection

This is what makes us innovators. It is the capacity to identify unexpected solutions by linking our skills.

It is the ability to imagine the future by directly combining what we know in the present: technology with customer needs, the world of research with that of business, the city with its residents.

Perfect

Perfect is the level we strive to achieve in the planning of innovative and efficient IT solutions in each specific sector.

Reliability

For us this is a constant practice that leads us to seek out perfection in everything we do, to always guarantee that we will meet our commitments in every situation and to consider effectiveness and efficiency to be the indispensable requirements of all the products and services we offer.



Simple

Being simple is the fundamental requirement of all of our systems, designed to improve people's lives through the availability and usability of information.

Simplicity

For us, this means concealing the complexity of technology behind a sleek user experience, making innovation and digital transformation accessible to businesses and the public through a project of extreme streamlining which seeks simple solutions.

1.1 The markets

GRI indicators 102-2; 102-6

Today, we are one of the main players in the digital transformation of businesses, and we owe this to the wide range of expertise and experience we have developed through many years of work in our various markets.



Banking, Finance & Insurance

Digital progress and financial technique: the duo of the future

The financial market is experiencing a radical transformation of its business model. The need to always offer new services that can be used at any time using any device requires the development of increasingly innovative and efficient IT solutions and services.

Thanks to the know-how accrued over more than 25 years of partnerships with the top credit and insurance institutions in Italy and abroad, we have the specialisation and experience to fully meet customer needs through tailor-made and omni-channel digital solutions: from creditworthiness assessments to monitoring, from capital markets to factoring management, from data value to customer experience.



Telco & Media

Skills and technologies for network virtualisation

In the Telco & Media market, technological innovation proceeds at the same pace as the need to expand the availability of value-added services while remaining competitive. We offer operators and manufacturers in the telecommunications sector extremely high-level technological expertise to allow them to manage digital transformation, reducing their operating costs through innovative solutions.

ExpriVia is the ideal partner for service providers that find an agile, efficient and customer-centric solution in the virtualisation of networks and applications. Indeed, virtualisation meets every customer need with dedicated services commensurate with real business requirements, but especially supported by innovative technological know-how that satisfies the most recent standards.

The quality of the services provided enables the customer to transfer a better customer experience to its users, enabling individual needs to be satisfied, including through customer loyalty policies.





Energy & Utilities

Energy-optimising technology

The energy and utilities sector is rapidly evolving to adjust to infrastructure technological upgrading processes, the development of new services and the entry into force of new directives on safety, energy efficiency and environmental and consumer protection, which are having a considerable impact on both supply and demand.

In this regard, we offer our customers specific solutions for the development and management of transversal and characteristic processes that aim to ensure greater operational efficiency, high performance and elevated customer service quality to energy, water, environmental and public utility sector businesses. Systems based on technologies like the cloud, XaaS, CRM, big data analytics and business intelligence, IoT, digital channels, social networking, e-mobility and enterprise application governance which place users at the very heart of processes, providing them with increasing autonomy and awareness.



Aerospace & Defence

Military defence, civil safety and digital technology

Recent geopolitical events demand an immediate response from the civil and military aeronautical, naval and terrestrial sectors in the adoption of safety systems where the technological element plays an increasingly crucial role in guaranteeing the safety of people, places, machinery and information systems.

Even more urgent is IT support for taking strategic decisions in critical situations for the implementation of preventive measures based on scenario monitoring and controls. We offer the sector a genuine advantage by enabling analysis of complex heterogeneous information (images, videos, data, texts, symbols, voices, sounds, etc.) generated by a multitude of wearable, fixed and mobile sensors on flights, in navigation, in orbit, in vehicles and in drones. In particular, we develop systems for command and control, surveillance, cartographic representation, processing of geographical maps and rapid prototyping of land-based, naval and aerial consoles which, partly thanks to augmented reality techniques, the wealth of geo-referenced information and social cooperation, offer maximum interaction with scenarios that are increasingly faithful to reality.



Manufacturing & Distribution

Towards the new industrial revolution

The future of industrial processes is following a digital path. The common thread lies in the various enabling technologies that are changing how we design, create and distribute products by automatically organising and managing an enormous quantity of information in real time.

The fourth industrial revolution is in full swing and very soon we will see completely controlled, interconnected and automated production through technological evolution.

Industry 4.0 defines this change through a panorama that is still evolving, but already has precise lines of development





coinciding with the knowledge and skills we possess: the use of data and connectivity, analytics and machine learning, human/machine interaction and interaction between reality and the digital realm. We have seized this extraordinary opportunity by focusing on bringing new-found energy to the entire industrial process with our digital solutions and completely automating the management of huge quantities of information in a simple, streamlined and efficient manner.



Healthcare

Innovative solutions for individual health and efficient administration

Building a healthcare system that combines savings and efficiency, takes care of people even before treating them, eliminates waste and reduces waiting times. With these main objectives, we represent the ideal partner for a healthcare system striving for a future of excellence.

The technological solutions we apply to the healthcare system make it possible to connect all of the disparate pieces of the entire Italian Regional Healthcare System, from administrative and management centres to public and private hospitals within the entire supply chain, right down to individual professionals and online services for users, ensuring maximum optimisation of every single resource.

A team of 350 specialists, 30 years of presence in the IT sector and solutions and services in 500 healthcare facilities for 20 million patients confirm the effectiveness of our responses to the needs of the healthcare industry, which are fundamental for the economy and development of every region.



Public Sector

PA digitalisation: the first step towards a reinvigorated country

Some time ago the Public Administration launched a modernisation process based on principles such as innovation, simplicity and reliability to support businesses, residents, public employees and the state itself. The streamlining of bureaucracy through the digitalised management of the Public Administration, together with organisational renewal measures, means we can now reconcile optimising expenditure with quality of service.

From this perspective, we have been able to draw on much of our experience in optimising processes for large private enterprises, which we have reconceptualised according to the needs of central and local governments and broken down into a range of areas, including:

- products and services for management;
- eGovernment and eProcurement solutions;
- storage and sharing of electronic documents;
- planning and control through business intelligence and business analytics platforms;
- performance measurement in PA processes;
- solutions to support administrative processes (SOA paradigm);
- single point of access for the exchange of information between entities, residents and businesses;
- system integration to ensure 24/7 operational continuity and automatic repairs.



1.2 Skills

EXPERTISE	DESCRIPTION
<p>Big Data & Analytics</p>	<p>Offer of all the very latest tools for supporting both decision-making processes and ordinary activities based on the possession of information. The Big Data & Analytics area is dedicated to developing projects, services and solutions aimed at the strategic use of big data for increasing business.</p>
<p>Cloud</p>	<p>The advent of cloud computing has completely changed the way IT services are acquired, deployed and executed.</p> <p>Our cloud services are based on four fundamental models: Public Cloud, Private Cloud, Hybrid Cloud, Community Cloud.</p>
<p>IoT & Contextual Communication</p>	<p>The IoT is capable of having a positive effect on the very idea of business, work, study, health and life.</p> <p>The main skills development areas are: Industry 4.0, Digital Healthcare, Smart Cities, Smart Grid.</p>
<p>Cybersecurity</p>	<p>Services designed based on the security controls of the National Institute of Standards and Technology (NIST), which, using information provided by the Exprivia Cybersecurity Observatory, can be divided into:</p> <ul style="list-style-type: none"> • Identify – From consultancy activities to Vulnerability and Penetration Tests (VAPT), from malvertisement campaign simulations to analysing and searching for data that may have been stolen and posted on the deep and dark webs. • Protect – Implementation and management of controls that focus on protection from any incidents, segmentation, micro-segmentation, management and governance of identities and accesses, management of privileged identities, static (SAST) and dynamic application security (DASD), security, obfuscation and masking of data at rest and in transit. • Detect – Continuous monitoring using SIEM and sophisticated AI tools. • Response – Exprivia has a team than can be called upon to respond to an incident (Global Response Team). • Restore – The GRT can be used not only to respond to an attack but to restore the service.



Mobile	<p>We offer companies and entities the possibility of reaping the maximum benefit from latest-generation mobile technologies by including them within a broader multi-channel strategy which encompasses Mobile Device Management for business devices, Mobile Payment in the various commerce and service sectors, Mobile Health and Mobile Application Development in the areas of health, finance and security.</p>
SAP	<p>With a strategic partnership that has lasted for more than 20 years, we are now one of the main reference players in the SAP world in Italy and abroad. Our main areas of intervention are: Administration, Finance and Control, Operation & Logistics, Business Analytics and Human Capital Management.</p>
Business Process Outsourcing	<p>Supporting company evolution by taking responsibility for the procedures of end user acquisition, management and retention. The offering ranges from back office outsourcing services relating to typically internal functions such as human resources, accounting and information technology, to front office outsourcing services like customer care and customer service.</p>
Network & Digital Transformation	<p>In the sector of Telco Operators and Media Companies, we have developed over time expertise on the convergence between IP and Optical networks and on components of the infrastructure of Mobile Operators.</p> <p>As far as Enterprise networks are concerned, we now have extensive expertise in the design and implementation of wired and wireless convergent solutions, Private Network solutions, SD-WAN, the technological refresh of corporate networks.</p> <p>Exprivia's Software Factory creates carrier-grade systems and solutions with robustness, scalability and resilience. We use Agile design and development methodologies in SCRUM and DevOps logic, making use of both open source technologies and off-the-shelf products for the design and implementation of customised solutions for the customer.</p>

1.3 The Group around the world

GRI indicators 102-3; 102-4

The Group is present abroad through its subsidiaries in Europe, Asia and America. Specifically, it has a presence in around 20 countries including Spain, Germany, Mexico, Peru, China and the United States. For more information on all the Group's offices, see the 'Location' section on the Exprivia website.





2. Materiality analysis in relation to the business

The Exprivia Group is constantly involved in carrying out its activities and achieving the business objectives it has set itself in full observance of the rights of individuals, fair competition, protection of the environment, and safeguarding of workplace health and safety.

The group carries out a wide range of activities and initiatives that are directly or indirectly related to sustainability issues. They range from the improvement and innovation of its products and services, through intense research activities, to internal company initiatives with numerous participations in Consortia, Associations and National and International Organisations.

In relation to the seventeen sustainable development goals adopted by the United Nations, a coherence analysis was carried out aimed at identifying goals that can actually be pursued by the group, in relation to its identity and the role it plays in the social and economic scenario.



In drawing up the Consolidated Non-Financial Declaration, we started from the consolidation of the virtuous processes set up during the previous year. The documentary sources linked to the group's core business have been updated and supplemented. The analysis was conducted in accordance with GRI Standards instructions.

Considering the huge size of the Exprivia Group, in keeping with the methodology adopted a year ago, cross-sectional work teams were created in two sub-groups, one for Exprivia and the other for Italtel.

The first activity consists in a benchmark evaluation and presentation of the analysis to top management.

The Exprivia Group's 2020 materiality analysis included the phases reported below.

- Evaluation of topics resulting from the above goals chosen;
- Evaluation of the main trends in the reference sectors;
- Evaluation of stakeholders' specific interests through the Company's press consultants;
- Sector benchmark assessment: the sustainability reports published by the Group's main competitors were analysed;

EcoVadis certificate

Since 2015, Italtel has subjected itself to an annual assessment of its *compliance* with the principles of *Corporate Social Responsibility* carried out by EcoVadis, an international organisation which has developed a collaborative platform for assessing the sustainability of suppliers operating within the sphere of global *supply chains*. Its analysis system is based on internationally acknowledged standards and is divided into four thematic areas: Environment, Work & Human Rights, Business Ethics and Sustainable Procurement.

In these areas, for the fifth year running, Italtel received the 'Silver Medal' in 2020, valid until 10 July 2021, with a score of 61 out of 100. Italtel has improved its score from year to year, and its overall score now ranks among the 11% best companies subject to assessment in its sector (18% last year) and among the 7% best companies in its sector for aspects linked to Business Ethics and Work & Human Rights.

2.1 Material topics

GRI indicator 102-47

Every year, the Exprivia Group defines and reports on relevant sustainability issues, with reference to the five areas of Italian Legislative Decree no. 254/2016, for the company and for stakeholders. The issues are defined on the basis of an identification and prioritisation process that includes the phases indicated in the previous paragraph.

Considering the offer provided by Exprivia (solutions composed of proprietary and third-party products, engineering and consulting services) and considering the sector to which it belongs, the Group has decided not to include the Coronavirus risk among its priority risks. For more details on this topic, see the thematic sections, as shown in the contents of this document.

254/16 Scope art.3 paragraph 1	Material topics	Risks	Policies and risk management
Respect for human rights	Diversity, inclusion and equal opportunities	Events that may jeopardise respect for human rights	The Exprivia Group expresses its commitment to protecting human rights through the Code of Ethics, the Organisation Model pursuant to Italian Legislative Decree 231/2001, careful negotiations with social stakeholders and gradual enhancement of sustainability, showing its ability to create value over time and promoting the economic and social development of the areas and communities in which it operates.
	Personal data protection		The Group is committed to actively supporting the Universal Declaration of Human Rights. Internal Audit provides support in preventing and mitigating risk factors.
Work and personnel management	Workplace health and safety	Risk connected with outgoing turnover	The development of human capital, quality employment and engagement are the pillars of the personnel management policies. Individuals are a true

<p>Attracting talents and developing human capital</p> <p>Decent working conditions</p> <p>Training</p>	<p>strategic asset for the achievement of the company plans and objectives. Human capital lies at the heart of company interests, furthering the potential of each individual resource and providing incentives for individual skills and capabilities.</p> <p>The Group adopts a stable employment policy for the workers, preferring permanent employment contracts and limiting the choice of temporary contracts solely to residual accessory term activities.</p>
<p>Social aspects</p> <p>Reputational risk</p> <p>Operational risk in the carrying out of activities with the local areas</p> <p>Risks related to corruption</p> <p>Risks related to dependence on customers</p> <p>Risks associated with contractual commitments</p> <p>Risks related to internationalisation</p> <p>Risks related to competition</p> <p>Credit risk</p>	<p>Relations with the local areas</p> <p>One of the pillars of the Exprivia Group's Strategic Plan is certainly the relations it holds with communities based on principles of transparency, ethics, inclusiveness and respect for human rights. These principles are included in the Code of Ethics.</p> <p>The Group defines and carries out specific action plans on an annual basis. The aim is to increase brand reputation both locally and at national and international level. These plans include activities which range from participating in or sponsoring local initiatives, such as events, conferences or seminars, to taking part in projects for the development of the local area promoted by the local authorities and solidarity support initiatives in favour of bodies and associations active within the territory.</p> <p>Relations with customers</p> <p>Market competitiveness is conducted in strict compliance with competition regulations and with a view to social responsibility and environmental protection, to ensure correct and functional use of resources. In this regard, thanks to the whistleblowing tool, customers in business relations with the Group may report any unlawful conduct. Such conduct may concern possible infringements of, or requests or inducements to infringe, laws or regulations, the provisions of the Code or internal procedures, with reference to the activities and services that concern the Group.</p> <p>Welfare</p> <p>The welfare initiatives implemented tend to introduce new services every year with respect to the range available to the workforce. Exprivia People Care is the company welfare plan which enhances the total reward system by responding to an ever broader range of worker expectations and needs, not only financial.</p> <p>Smart Working takes on the form of a new approach</p>

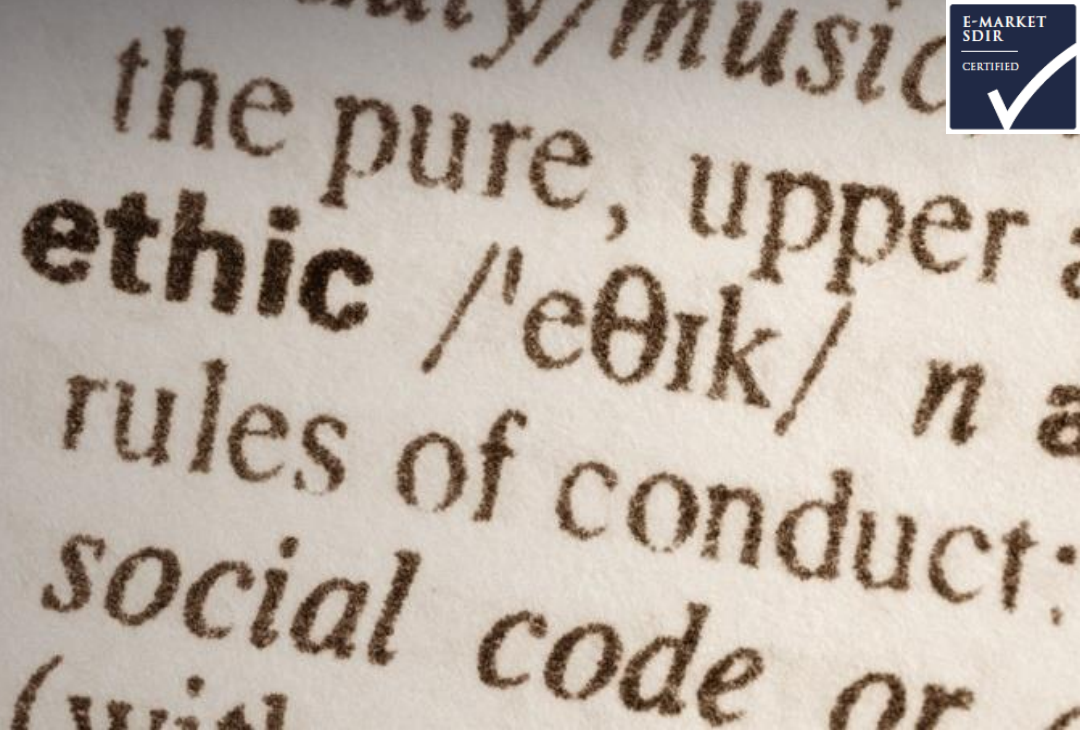


			to company organisation, where the individual needs of the worker balance, in a complementary manner, those of the company. The Group has created a series of activities aimed at implementing this means of working.
Environment, health and safety: use of energy resources, impact of emissions on the environment	Energy management	Environmental risks	<p>In order to mitigate risks, the Group undertakes to:</p> <ul style="list-style-type: none"> • Operate in compliance with all laws, regulations and standards applicable in the environmental sphere; • Constantly safeguard the environment from the performance of its production processes and from the use of the company's infrastructures and structures that are necessary for the above processes; • Inform, train and update the company staff so as to promote environmental responsibility and awareness; • Monitor and assess the environmental impacts generated in the conducting of business activities, preventing environmental pollution and the potential environmental effects of new processes and/or variations; • Continuously improve the Environmental Management System to improve the company's environmental performance.
	Environmental protection and responsible use of resources	Risks associated with health and safety in the workplaces	<ul style="list-style-type: none"> • Seek and develop technologies and innovative solutions, such as easy access to health services, environmental protection and improvement, and ongoing training at work;
	Use of socially responsible suppliers committed to environmental protection	Risks relating to information security	<ul style="list-style-type: none"> • Provide products and solutions that offer the best safeguards for the environment and the health and safety of their installers and users, until their disposal at the end of their useful life;
		Risks associated with the management of SW projects and IT services	<ul style="list-style-type: none"> • Reduce emissions of greenhouse gases (GHGs), including through the promotion of alternative ways of working that minimise commuting between home and the office (smart working) and business trips;
		Risks relating to the business context and to legislative/regulatory compliance	<ul style="list-style-type: none"> • Reduce waste by encouraging recycling and safe and responsible disposal;
		Business risks at corporate level	<ul style="list-style-type: none"> • Give priority to suppliers and partners partly based on their compliance with the principles expressed in this policy.
Fight against corruption	Business management ethics Prevention of	Risk of corruption that affects relations with the PA	<p>In order to mitigate risks, the Group is equipped with:</p> <ul style="list-style-type: none"> • A Code of Ethics which prohibits practices of corruption, illegitimate favours, collusive conduct and solicitations of benefits (whether direct and/or through



Corruption	Risk of corruption related to the processing of sensitive data and the confidential information of third parties	<p>third parties).</p> <ul style="list-style-type: none"> • The Internal Audit unit, which has assurance tasks with the purpose of assisting the organisation in the pursuit of its objectives. • The implementation, in accordance with Italian Legislative Decree no. 231/2001, of the internal Organisation Model, oversight of which is the responsibility of the Supervisory Body.
Fair competition	Risks of discrimination	<ul style="list-style-type: none"> • The adoption of a Quality System which constitutes a structured compliance programme containing, inter alia, tools and policies useful for combating and preventing active and passive corruption.
	Risk of lack of ethics in business management	<ul style="list-style-type: none"> • The implementation of the guidelines to be used by the procurement unit for assessing the reputational reliability of the third parties with which Exprivia has business dealings, with the purpose of carrying out an integrity check and protecting Exprivia from possible negative repercussions due to monetary fines or disqualification (pursuant to Italian Legislative Decree no. 231/01) and from the reputational risks linked to any unlawful practices in business dealings.
	Risk of unfair competition.	<ul style="list-style-type: none"> • The whistleblowing platform capable of ensuring the maximum levels of confidentiality for reports to the Supervisory Body on unlawful conduct significant for the purposes of the 231 Decree, based on precise and consistent factual elements and on the violations of the body's Organisation, Management and Control Model, which the intended audience has become aware of as a result of the functions performed.
		<p>For the same purposes, Italtel adopts the following safeguards for itself and its subsidiaries:</p>
		<ul style="list-style-type: none"> • Every year, it conducts scheduled auditing activities, through the Compliance Office, on the processes in the context of which corruption offences are at risk of being committed
		<ul style="list-style-type: none"> • It disseminates its Code of Ethics to its business partners and expressly requests compliance
		<ul style="list-style-type: none"> • Since 2002, Italtel S.p.A. has adopted an Organisation, Management and Control Model pursuant to Italian Legislative Decree no. 231/2001
		<ul style="list-style-type: none"> • Since 2013, it has disseminated and ensured that all subsidiaries adopt Prevention Principles and Behavioural Guidelines aimed at preventing the offences included in the same decree, in line with Italtel's 231 Model

-
- Prevention of active and passive corruption
 - Internal policies for the resolution of conflicts of interest
 - Privacy Regulation (GDPR)
-



3. Organisation and management model

3.1 Corporate governance

GRI indicator 102-18

Exprivia

The corporate governance system of the Exprivia SpA holding company is developed according to the legislation in force and applicable to the sector, and respects the legal regime of a listed issuer as well as the indications of the Code of Self-governance promoted by Borsa Italiana with which the company complies. In its organisation, Exprivia also takes into account the best practices which can be obtained from discussion at international level. Exprivia exercises Management and Coordination activities, pursuant to articles 2497 et seq. of the Italian Civil Code, exclusively over the group companies wholly controlled by it, whether directly and indirectly. For this purpose, the Board of Directors of Exprivia approved a Regulation on the exercising of Management and Coordination activities on 4 December 2017, which governs the mechanisms used by the Holding Company to determine the procedures for managing the necessary intra-group information flows and to carry out its management and coordination activities over the companies subject to it. In any case, all the companies controlled by Exprivia, including those subject to its management and coordination, are legally independent and apply the principles of correct corporate and business management through a traditional administration and control system that assigns management tasks to the Board of Directors, monitoring legality to the Board of Statutory Auditors and statutory auditing to the independent auditing firm.

Therefore, the **main governance bodies** of Exprivia are: the Shareholders' Meeting, the Board of Directors, the Board of Statutory Auditors and the Independent Auditing Firm. The Shareholders' Meeting is the corporate body that expresses the shareholders' will through its resolutions. Exprivia's Board of Directors operates through the chief executive officer and is assisted by Committees, established within the sphere of said Board, with proposal and advisory functions: the Control and Risks Committee and the Appointment and Remuneration Committee. Lastly, the Board of Directors appoints a Supervisory Body (SB) for a three-year term. The SB is tasked with monitoring the correct functioning of the Organisation, Management and Control Model pursuant to Article 6 of Italian Legislative Decree 231/01 and reports to the Board of Directors and Risks and Control Committee. For any further details on the composition of Exprivia's administration and control bodies, see the document on Corporate Governance and Ownership Structures, which may be found in the Corporate > Corporate Governance > Corporate Information section on the Exprivia website.

In 2020, as in the two previous years, the management of Exprivia's **organisational and governance model** was headed by the chief executive officer and comprised the heads of the various company divisions, both production (DF) and business line (MIU) and STAFF. The Internal Audit function helps the Board of Directors and management improve the control processes, by suggesting the implementation of any corrective actions to the Board of Directors, through the Control and Risks Committee. The manager who is responsible for the coordination of the activities in accordance with Italian Legislative Decree No. 254/16 and the drafting of this document, reports directly to the chief executive officer and



expresses indications, sharing project aspects and monitoring the results achieved. In order to integrate sustainability more fully into the business, the manager in charge cooperates with the various Divisions in managing of the processes typical of the relevant areas, including thanks to the activation of the network which has contributed to the drawing up of the related policy. Furthermore, in order to monitor the independent compliance goals for correct corporate and business management, the companies Italtel S.p.A., Exprivia Projects S.r.l. and Spegea scarl have also adopted their own Organisation and Management Models pursuant to article 6 of Italian Legislative Decree no. 231/2001 and have entrusted the relevant Supervisory Bodies appointed by the respective Boards of Directors with the task of checking and controlling their implementation.

Italtel

It is worth mentioning the governance of Italtel not subject to the management and coordination of the parent company, to which the Non-financial Declaration has been extended since 2018. Italtel is equipped with a Board of Directors, the functioning of which is governed by the Articles of Association in force, approved on 27 November 2017. In Italtel, the Board of Directors also operates through the Chairman and the Chief Executive Officer, vested respectively with the powers conferred by the Board of Directors, and avails itself of the advisory functions of two Committees: the 'Related Parties Committee' and the 'Remuneration Committee'. The Board of Directors of Italtel also appointed the Supervisory Body pursuant to Italian Legislative Decree no. 231/01. This body, with the support of the Compliance Office, whose manager sits on the SB, continually checks the implementation of the 231 Model, its effectiveness and its compliance by the Italtel workforce. In 2020, as in previous years, the Supervisory Body of Italtel approved the Compliance Office's annual activity plan and the related expenditure budget; it also checked the results of the information flows periodically and for each event received in keeping with the provisions of the 231 Protocols.

3.2 The internal control system and risk management

GRI indicator 102-15

Since 2014, Exprivia has adopted its own Risk Model for itself and its single-member subsidiary Exprivia Projects and has developed a risk assessment method that focuses on risk areas that are of real concern and create added value for the organisation. The framework used is CoSO2, which analyses the main components of the internal control system. Based on exposure to the risks affecting the organisation and on the inputs from senior management and the BoD, the Internal Audit prepares its own audit plan. The main aims of the audit are to provide assurance and information to senior management and to the BoD to achieve the organisation's goals, including an assessment by Management of the effectiveness of risk management activities.

Italtel has implemented a corporate risk management system and the Internal Audit & Compliance Office function, based on exposure to the organisation's various risks, the inputs from the company management and the indications provided by the Board of Directors, drafts an audit plan every year. The plan's main objectives are to provide assurance regarding the effectiveness of the internal control system and also to supply all the company functions with the information needed to improve the effectiveness of the risk management activities carried out by said functions.

3.3 Prevention of active and passive corruption

GRI indicators 102-16; 102-17; 102-30; 205-1; 205-2; 206-1

3.3.1 Significance for the Exprivia Group's activities

Corruption represents a serious risk for the activities and the reputation of the Group, therefore it has been identified as a material topic of great importance. For this purpose the Group has countered the occurrence of phenomena deriving from the violation of the body of laws overseeing correctness, honesty and loyalty in every relationship both internal and external adopting a commitment of "zero tolerance" vis-à-vis corruption under any form, confirmed in both the respective Codes of Ethics and the respective Organisation, Management and Control Models adopted in accordance with Italian Legislative Decree No. 231/01 by each Group company. This commitment is applied in Exprivia by means of an appropriate Disciplinary System vis-à-vis the employees, as well as vis-à-vis third parties with the provision of specific "ethical"

contractual clauses (Indicator GRI 205-1). In 2020, as in 2019, the Supervisory Bodies of the respective companies did not receive any reports, nor detect any episodes, of corruption.

Staff information activities regarding Italian Legislative Decree no. 231/2001, the Code of Ethics, and the Organisation, Management and Control Model continued, through the updating of the information content of the company intranet specifically dedicated to *Compliance Office* activities.

The audits conducted on sensitive processes for 2020 covered the activities carried out by the Company in the risk area pertaining to crimes against the Public Administration (Special Part A of the Model).

In 2020, the Supervisory Body of **Exprivia**, as a result of the epidemiological emergency caused by infection from COVID-19, decided to ask the relevant functions to implement a more intense transmission of information flows with particular reference to health and safety in the workplace and received updates from time to time regarding the measures adopted by the Company to contain the risk connected with the COVID-19 health emergency, measures which are consistent with the relevant Prime Ministerial Decree (Prime Ministerial Decrees) issues and the indications provided by the competent bodies.

As regards **Italtel**, the sensitive process audits for 2020 were aimed at activities which the company carries out within the '*Prevention of offences in violation of the health and safety at work legislation*', included in Special Part C of the Italtel Model.

These audit were also carried out by **Spegea**, within the context of the verification of its Organisational Model.

For some years, **Exprivia and Italtel** have had an internal system for reporting irregularities. The system is made available to employees and anyone working for or on behalf of each Group company. Since 2019, this system has been assured, including in terms of protecting the identity of whistleblowers, in line with the requirements of the European General Data Protection Regulation (GDPR), and in compliance with Italian Law no. 179/2017 ('*Provisions to protect those who report offences or irregularities of which they become aware as part of a public or private employment relationship*'), by a dedicated computer platform that can be accessed from the websites of the two companies. Therefore, the web portal is today the primary reporting channel adopted by Exprivia for reporting any infringements of the Code of Ethics or, more generally, offences within professional activities (whistleblowing) of which the whistleblower becomes aware.

In 2019, Italtel renewed its Legality Rating for the second time. It was first assigned this rating in 2015. The score assigned by the Antitrust Authority (AGCM) in 2017 was confirmed as the highest possible, i.e. three stars. This important result places Italtel among the companies most committed to adopting ethical principles in their own conduct and to operating in compliance with the law. The validity of the legality rating is two years, so the latest renewal will remain in effect until 2021.

3.3.2 Auditing activities and management results

Internal auditing

The **Exprivia** Group companies, each within its remit, carry out systematic internal auditing for the purposes of business ethics, corruption prevention, the management of financial resources and the procurement system, environmental management, information security, personal data protection (privacy) and Human Resources management, in addition to those aimed more specifically at business and production: checks of the management of Projects, Services and Sales through the audits conducted by the competent SBs and the Integrated Management Systems tasked with ensuring the Quality Systems.

External auditing

Exprivia, in its capacity as a technological company which has partnerships with leading multinationals in the IT sector (SAP, Microsoft, Oracle, etc.) is normally subject to periodic audits carried out by the third parties with which it has business dealings. Exprivia is also subjected to periodical auditing carried out by public or private certification bodies. These audits also concern the compliance of the internal processes, the observance of the intellectual property rights in the use of third

party software, the protection of the security of the information and the handling of the medical and EC marked devices.

Italtel and its direct subsidiaries are subject to external audits carried out by third parties with which they have business dealings, typically Customers, at their request, or by certification bodies.

3.4 Customer relations

By means of a varied offer, the Group offers its solutions to private and public concerns of every size; together, they search for new business models imposed by the era of Digital Transformation:

- the radical change in the business scenarios with the fourth industrial revolution which very soon will see completely controlled, interconnected and automated production through technological evolution;
- the new solutions for the virtualisation of the network systems;
- the innovative technologies which are changing the world of the utility companies in production, distribution, transport and sales of the primary sources (water, energy, etc.);
- the need for increasingly complex processing of quantities of data for the analysis of the phenomena of the environment and the earth;
- the transformations in the world of credit and finance in a sector which is very rapidly evolving;
- the health system which is changing, influenced by the growing attention to personal well-being and care, the progressive ageing of the population and the growing diffusion of chronic illnesses, which to these factors added the need to increasingly rationalise the progressive increase in health spending;
- the streamlining of bureaucracy, organisational renewal, which permits the optimisation of the expenditure for the quality of the rapid and efficient services which bring the citizen closer to the public body.

Specifically, **Italtel** delivers an annual evaluation questionnaire to a sample of 12 customers (7 from the LATAM area, 3 from the EMEA area and 2 from the ITALY area), chosen based on their turnover/strategic importance for the company, operating in the Service Provider, Enterprise and Public Sector categories in order to gauge their satisfaction. The application of this method, combined with the search for continuous improvement (Plan Do Check Act cycle), has allowed Italtel to record high levels of customer satisfaction over the years (in 2018, 2019 and 2020 average satisfaction was 4.4, 4.3 and 4.5, respectively, on a 1-5 scale) and to establish further dialogue with customers in order, on the one hand, to acknowledge their expectations and future needs and, on the other, to illustrate Italtel’s viewpoint on highly interesting technological and market issues.



Piattaforma EXPRIVIA per la segnalazione di condotte illecite e di irregolarità nell'ambito dell'attività lavorativa

Sei un whistleblower?

[Invia una segnalazione](#)

Hai già effettuato una segnalazione? Inserisci la tua ricevuta.

XXXX XXXX XXXX XXXX

The Exprivia Whistleblowing Platform, where customers in business relations with the Group may submit reports.

Piattaforma ITALTEL per la segnalazione di condotte illecite e di irregolarità nell'ambito dell'attività lavorativa

Sei un whistleblower?

[Invia una segnalazione](#)

Hai già effettuato una segnalazione? Inserisci la tua ricevuta.

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The Italtel Whistleblowing Platform, where customers in business relations with the Group may submit reports.

This reporting channel can also be accessed from the Group's website. No reports of this kind were received during 2020. At the same time, in its work, the Group pays attention to the satisfaction of customers and/or colleagues, taking prompt and effective action.

3.5 Supplier network

GRI indicators 102-9; 414-1

One of the Group's assets is the closely-knit network of suppliers for the execution of its activities. In the majority of cases, this involves parties with which, over time, it has constructed clear relationships, capable of creating value over the long-term.

With the exception of a few cases relating to the management of physical spaces (security, cleaning, etc.) or vertical functions (accounts auditors, administrative consultants, telephony, etc.), the Group operates with suppliers who work in the same sector as the company, i.e. Information and Communication Technology (ICT), handled according to high quality standards. The Group guarantees its suppliers fair remuneration for their activities and the respecting of payment times, in exchange for a commitment for ever increasing quality and efficiency.

3.5.1 Guidelines for supplier assessment and selection

Exprivia

All Exprivia suppliers are subject to a periodic evaluation and qualification process, according to the Quality Management System, with particular reference to the Procurement Procedure. The steps of the procedure are briefly shown here.

Exprivia procures goods and services from suppliers on the Qualified Suppliers List. The suppliers are divided into three classes: Approved suppliers, Suppliers approved with due reservation, Unapproved suppliers.

The activities for the qualification of the suppliers involve an initial assessment for the purpose of introducing new suppliers in the List of Suppliers approved with due reservation and a periodic assessment, within the first quarter of the year following that of reference, which makes it possible to establish the permanence or otherwise of the supplier within one of the three classes making up the Qualified Suppliers List.

When there is the need to introduce a new supplier, the Purchasing Unit carries out an initial qualification, requesting all the documentation, for the purpose of noting the regularity thereof. The documents requested include: Chamber of Commerce registration; Copy of latest financial statements to verify solvency and financial soundness; D.U.R.C. (contribution compliance certificate); DVR (risk assessment document) and declaration of general safety conditions, pursuant to Italian Legislative Decree 81/08; Compliance self-certification; Copy of professional civil liability policy (desirable but not mandatory); Declaration of general safety conditions; ISO compliance.

In the event of 'special' supplies, such as those regarding services and supplies related to good and sound facility





management, the above documentation is supplemented with further documents to check compliance with specific laws and/or special technical requirements.

It is not compulsory for suppliers to send us the above documentation, since only specific regulatory requirements are of a mandatory nature. With regard to Exprivia's procurement procedure, submission of all the documentation is necessary for qualification purposes, otherwise the Supplier could be excluded, unless submission is considered to be a preferential element.

A number is associated with each supplier which determines its ranking. Qualified suppliers are entered in a supplier register which is updated annually. All of the documentation produced and received during the qualification process is digitally stored in specific folders on the big 1 server. Suppliers that no longer meet the qualification requirements are suspended from the Register, blocked in the information system and included on a list of inactive suppliers, making it no longer possible to issue orders to them.

Monitoring: the Procurement function observes the performance of the qualified suppliers and assesses over time whether they can still be included among the active suppliers. It can decide to cancel the previous qualification, making it impossible to issue orders and consequently eliminating the supplier from the Supplier Register. Furthermore, in order to keep suppliers aligned with the needs of Procurement as much as possible, it conducts an annual update of the assessment sheet of every single supplier.

Italtel

In 2020, the company Italtel updated the Supplier Selection and Qualification Guidelines, as a follow-up to the new Italtel Group Purchasing Policy issued in 2016. The Policy defined the general criteria, responsibilities and operating procedures to ensure the supply of products and services to customers which meet the demands of quality, cost, time and reliability, by working with suppliers that share the respect for people, environmental protection and the principles of honesty and integrity as set forth in Italtel's Code of Ethics.

Supplier selection and purchase transactions were therefore carried out by giving priority to companies meeting the following criteria: they comply with laws and regulations with a view to Corporate Social Responsibility (CSR) and focus on respect for human rights and environmental protection, their core business is related to the activities covered by the transaction, they have an organisation and tangible/intangible assets of an appropriate size and quality in relation to the type and size of the supply to be carried out and such as to guarantee suitable quality, prices and delivery time, they are able to guarantee the required quality levels each time, they are able to guarantee the stable and continuous supply of goods and/or services over time, including through formalised emergency plans, and be sufficiently flexible to respond rapidly to fluctuations in market demand/supply.

All Italtel suppliers are subject to a selection, qualification and periodic assessment process. The aim of the supplier selection, qualification and monitoring process is to identify and maintain suppliers capable of supplying products and services, on a continuous basis, that meet company requirements. This is achieved by checking, assessing and monitoring technical, organisational and management skills, reputational ethical reliability, economic and financial soundness, and compliance with the requirements relating to Environmental Management Systems, Quality and Information Security, and CSR commitment.

In view of the company's supply needs and requirements and of its need to purchase new products/services or to acquire new suppliers for projects being defined, the Procurement function starts to look for new suppliers to be qualified, possibly alternative to those already used. First of all, it performs a preliminary check on the suppliers, where necessary availing itself of the support of the Finance & Administration department for any economic and financial aspects. The Procurement function submits the suppliers who have successfully passed the preliminary check (potential suppliers) to the next assessment and qualification phase. These suppliers are asked to complete a qualification form and to send supporting documents (i.e. chamber of commerce certificate; most recent financial statements; quality, technical and sustainability certifications).

If the information contained in the supplier's summary sheet is sufficient to show that it is able to guarantee the supply of goods and/or services according to requirements, the supplier is qualified (indirect assessment method).

The result of the assessments is clarified by evaluating the level of compliance with requirements of the following:

Environmental Management System, Quality Management System, Information Security Management System (necessary for suppliers of repair, installation or TAC1 services and, in general, those which provide a service at the customers premises or at Italtel), Financial Soundness, Supplier's Corporate and Administrative Information (Chamber of Commerce Certificate or equivalent document), Social Accountability.

A number is associated with each supplier which determines its ranking. 'Qualified' suppliers are entered into a dedicated information system to allow orders to be issued to them. All of the documentation produced and received during the qualification process is digitally stored on a specific web portal, in a folder associated with the assessed supplier.

Suppliers that no longer meet the qualification requirements are suspended from the Register, blocked in the information system and included on a list of inactive suppliers, making it no longer possible to issue orders to them.

Monitoring: the Procurement function observes the performance of the qualified suppliers and assesses over time whether they can still be included among the active suppliers. It can decide to cancel the previous qualification, making it impossible to issue orders and consequently eliminating the supplier from the Supplier Register. Since 2018, the first year of application of the new Supplier Selection and Qualification Guidelines, the proportion of suppliers included in the Register with these characteristics has been over 40%, corresponding to 80% by value of acquisitions.

Furthermore, in order to keep suppliers aligned with the needs of Procurement as much as possible, it conducts a periodic (typically, annual) update of the assessment sheet of every single supplier.

3.5.2 Supply indicators in accordance with sustainability

GRI indicators 204-1; 308-1

This document highlights some indicators with regard to the sustainability of the supplies carried out by **Exprivia** in 2020. Exprivia's suppliers can be divided as follows by category of purchases in 2020: 45% consulting (53% in 2019), 38% hardware (34% in 2019), 10% software (2% in 2019), 7% other purchases (11% in 2019). New suppliers evaluated according to social criteria:

Base figure	2020 ¹	2019	2018
Use of local suppliers by significant venue ²	89%	91%	72%
New suppliers that have submitted a DVR	42%	76%	61%
Code of Ethics	84%	76%	87%

New suppliers evaluated according to environmental criteria:

Base figure	2020 ³	2019	2018
New suppliers provided with environmental certifications	29%	25%	17%

3.5.3 Tax Governance

GRI indicators 207-1; 207-2

¹ The figures refer to Exprivia and Italtel suppliers to which an order above Euro 100,000.00 was issued in 2020

² The suppliers taken into account have registered offices in the area where they operate

³ The figures refer to Exprivia and Italtel suppliers to which an order above Euro 100,000.00 was issued in 2020

Although convinced that the tax system needs updating on the basis of the great changes undergone by the economic system, changes that have become increasingly clear in the lives of both private individuals and businesses, specifically because of the ongoing pandemic, Exprivia, which has also been aware of its social role, not only in terms of employment, with around 3,980 employees, pays great attention to tax issues, as regards both their effects on the country's system and internal financial dynamics.

Most of Exprivia's activities are carried out in Italy. However, due to its presence in Spain, Brazil, Mexico and China, the company draws up and updates its tax policy on an annual basis in accordance with the international 'transfer pricing' rules which govern tax flows between different countries.

Exprivia's approach to taxation is marked by transparency and total compliance with local and international regulations. The Administration Department handles compliance and tax optimisation including through continuous discussion with external professionals that support the company, by following all the new regulations that must be complied with within the time frames envisaged and which must be used in the event of new rules in support of companies.

The Board of Directors is promptly informed of particular risks arising from issues of a fiscal nature and oversees the correct approach introduced by the companies' managers.

Fiscal control governance is, therefore, requested by the Board of Directors from the Administration Department which, through the use of adequately trained and competent personnel and with the support of external consultants, monitors the propriety of transactions and applies the correct regulations. All requests made to Exprivia by the tax authorities are managed within the correct information flow, with Exprivia's approach marked by total transparency and constructive dialogue.



4. Human rights

GRI indicator 102-8

In the **Exprivia Group**, the Human Resources Management and Organisation processes are conducted in compliance with the company's Code of Ethics and the enhancement of human capital, ensuring protection of the principle of equal opportunities.

The Group guarantees the best working conditions in accordance with the Workers' Health and Safety Legislation and, as regards the Human Rights Policies, refers to the Organisational Model 231 (Italian Legislative Decree No. 231/01). In this regard, the Group also undertakes to protect the moral integrity of its employees by protecting them from acts of psychological violence and by combating any form of discrimination or harm to individuals and ideas.

The Group considers its people a paramount asset for achieving business and offer-development objectives and therefore ensures the training and active involvement of people in the proposal phases, by facilitating teamwork and working conditions that protect people's psychological integrity and promote creativity and personal initiative.

Placing people at the centre of the development plans means first and foremost protecting people's rights and making sure that they can work in an environment that fosters the professional development. To achieve this, it is essential for Exprivia to adopt the principles of equality, meritocracy and equal opportunities and to promote individual diversity as an added value, by actively supporting the Universal Declaration of Human Rights.

In 2020, with the aim of assessing the levels of organisational well-being of our human capital, we sent the entire Exprivia workforce a Climate Survey, to identify the most important dimensions that concern people's well-being, i.e. recognition of company values, satisfaction in terms of Team Working, satisfaction in manager-staff relations, satisfaction in relationships with colleagues. The average positive result in the various dimensions (feedback: very, extremely and fairly) was around 88%. Moreover, again in terms of well-being, much was invested during 2020 in smart working arrangements, involving almost the entire company workforce. Details of this way of working will be provided in this report.

4.1 Exprivia staff: the significant numbers

The Exprivia Group has an employment trend with regard to staff which is growing continually and can count on highly professional management with managerial ability recognised throughout the market.

A number of aspects inherent to the workforce of the Group as of 31 December 2020 are presented below.

The quantitative information provided refers to the employees in terms of single individuals and they are not expressed as full time equivalents (FTE).

Furthermore, the information provided is considered to be sufficient for ensuring understanding of the human resources management carried out by the Group. Certain information associated with the reference GRI standards, if deemed sensitive for business activities, has been omitted.

4.1.1 Total workforce

Scope: Exprivia S.p.A., Exprivia Projects, Spegea, HRCOFFEE, Exprivia Asia, Exprivia SLU, Exprivia Do Brasil, ProSAP Perù, ACS Germania, Italtel S.p.a, Italtel France, Italtel USA, Italtel SA, Italtel Deutschland, Italtel Poland, Italtel Peru, Italtel Argentina, Italtel Brasil, Ausoitaltel.

Total workforce	2020	2019	2018
Total employees	3,980	4,036	3,969
Of which BPO workers	628	616	581

The Exprivia Group carries out important **Business Process Outsourcing (BPO)** activities, spread between its offices in Molfetta (BA) and Palermo, on behalf of large enterprises in the Italian industrial sector. Due to the specific dynamics of the sector, the employment agreements applied, the type of skills used, it was considered necessary to differentiate the analysis with respect to the predominant sector, **Information Technology (IT)**.

Therefore, due to the presence of the business component, BPO, the company population is distributed throughout Italy with a more significant presence in the south, where the registered and administrative offices of the Group are also located (in Molfetta); these offices employ the majority of the workers in the Staff units.

4.1.2 Geographical breakdown

Geographic areas	no. employees 2020	% of area 2020	no. employees 2019	% of area 2019	no. employees 2018	% of area 2018
Italy	3,429	86.16%	3,464	85.83%	3,447	86.85%
Abroad	551	13.84 %	572	14.17%	522	13.15%
Overall total	3,980	100%	4,036	100%	3,969	100%

4.1.3 Breakdown in relation to qualification

GRI indicators 405-1; 202-2

The breakdown by qualification of the staff as of 31 December 2020 is 85.10% represented by professionals and 14.90% by managers. Women represent around 32.16% of total employees.

In 2020, the analysis of the age of the company population revealed a clear predominance of the 30-50 years age bracket. The trend relating to the latest recruitment, however, is changing in favour of the under 30 bracket.

Age bracket	Management	Middle management	White-collar workers	Other ⁴
<30	-	1	434	4
30-50	28	214	2,266	1
>50	53	297	687	3
Overall total	81	512	3,387	8

Category	2020		2019		2018	
	Men	Women	Men	Women	Men	Women
White-collar workers	2,210	1,177	2,247	1,188	2,232	1,121
Middle management	418	94	419	89	421	94
Management	72	9	80	10	81	12
Other	4	4	2	1	1	7
TOTAL	2,704	1,284	2,748	1,288	2,753	1,234

90.00% of managers and middle managers resident in Italy are recruited at the Group's operating centres. The other category refers to interns and co.co.co. workers (on a contract for freelance work coordinated by an employer).

4.2 Workplace health and safety

In order to ensure an increasingly greater protection on the health and safety in the workplace sphere, Exprivia and Italtel used dedicated staff, employed in risk assessment, in the planning and implementation of the training activities, in the active involvement of all the staff and in the performance of the operational monitoring activities. Safety management is a concrete commitment to a shared culture, which concerns not only Exprivia and Italtel staff, but also suppliers, consultants and contractors, with the aim of involving the entire company community.

4.2.1 COVID-19 emergency

Exprivia

In the light of the pandemic emergency connected with the spread of the COVID-19 virus, Exprivia, in compliance with the provisions of the various Prime Ministerial Decrees issued, has drafted specific, shared Anti-Infection Protocols to contain the spread of the virus in work environments. Both preventive/protective and organisational/managerial measures have been adopted. In addition to the mandatory measures, Exprivia has provided workers with information regarding the risks connected with smart working. To mitigate and contain the risks, the company took swift action when the virus broke out in Lombardy in February 2020, establishing a working group for the COVID-19 emergency, comprising the Head of the Prevention and Protection Service, the Logistics Manager, the Corporate Services manager, the Personnel Administration Manager and the director of the Strategies and Communication structure, which, acting closely with the company physician

⁴ This category includes contract workers and/or interns/trainees.

and in accordance with the indications from the institutional bodies, implemented the necessary measures for managing the emergency. The company is in line with the governmental provisions for combating the spread of Coronavirus, with the aim of adhering to the necessary measures for protecting public health and the endurance of the health system, along with the objective of safeguarding productivity and the value of services to customers, while protecting the health of all its agents, employees and third parties.

To this end, the health and behavioural rules laid down by the national authorities have been disseminated and shared with the employees. Smart working was introduced right from the initial outbreaks of the infection, throughout Italy. From March 2020 until the end of the year, over 90% of the company workforce were working from home. Commuting and business trips were suspended right from the initial phase of the emergency, with meetings and training activities guaranteed through videoconference systems. They were only reintroduced in cases of pressing need. Preventive oversights were adopted in the offices and hygiene measures strengthened. There was a reorganisation of the spaces in the contact centre departments to enable sufficient distancing between operators in accordance with governmental recommendations.

The measures adopted to reduce risks and guarantee operational continuity are as follows:

- Smart working where possible;
- Suspension of meetings, which are conducted using videoconferencing and other equivalent means;
- Organisation of workstations at the recommended distance from each other for activities that cannot be performed remotely;
- Reinforcement of cleaning services and implementation of workplace disinfection and sanitisation activities, with the sanitation of bathrooms and common areas;
- Hygiene facilities in workplaces where workers are present (sanitising gel, gloves, etc).

The memorandum of understanding signed between the government and the social partners was promptly adopted by the company and sent by e-mail to the entire workforce; the memorandum is accompanied by a notice on the processing of data on workers' health status, when collected on entry (measurement of temperature, etc.), in accordance with the provisions issued on 16 March 2020 by the President of the European Data Protection Board within the context of the COVID-19 epidemic.

In addition to the internal working group, a committee has been established, pursuant to the protocol of 14 March 2020, comprising the occupational physician, the Head of the Prevention and Protection Service, the Personnel Administration Manager, the worker safety representatives and the RSU (unitary workplace union structure). The Committee has met periodically since 14 March to share what has been carried out, along with any updates, and to acknowledge any new requests. Dialogue began in November 2020 concerning the future ways of working remotely, and it was decided to extend smart working to the entire workforce for the next few years.

Italtel

As regards Italtel, January 2020 saw the completion of the revision and updating of the Risk Assessment Documents (DVR) for all the offices and all the activities carried out at customers' premises. Subsequently, following the Declaration of the State of Emergency associated with the spread of coronavirus (Council of Ministers decision of 31/1/2020 published in the Italian Official Gazette on 1 February 2020), in addition to its ordinary health and safety activities, the company, in conjunction with the Company Physician, including at Italtel, immediately implemented a series of prevention and risk management measures connected with COVID-19.

On 6 February, the coronavirus prevention report was published on the company intranet and notified to all employees; the company has thus constantly monitored the epidemiological picture and, with the first cases in Lombardy recorded during the second half of February, the Coronavirus Emergency Management Unit was set up, enabling monitoring of the escalation of the emergency and the occasional implementation of the provisions issued by the governmental and regional bodies (Prime Ministerial Decrees, Decree Laws, Orders, etc.). The emergency management process is based on three main strands:

- I. Information, communication and documentation;
- II. Operations (implementation of provisions/measures);
- III. Monitoring and corrective or improvement measures.

The first strand encompasses the statements, reports, procedures (especially the COVID-19 Emergency: Activities carried out off company premises procedure), protocols and supplement to the DVR (risk assessment document) subsequently incorporated into the company's anti-infection COVID-19 Emergency protocol: Activities and presence in company offices, Anti-COVID-19 Infection Protocol.

The second contains all the measures introduced to implement the provisions, e.g.: posters, procurement and distribution of PPE and installations (disinfectant gel), smart working, managing access to company premises, recruitment of staff that carry out activities at the customer's premises, redefinition of the layout of the workstations, procedures for the provision of internal services, cleaning and sanitisation (periodic and extraordinary), etc.

Lastly, there is the constant verification of the effectiveness of the process that consists, inter alia, in taking on board all the feedback on the effectiveness of the prevention measures (reports from workers, activity operators, Workers' Safety Representative, RSU (unitary workplace union structure), etc.). Where necessary, the reports are discussed by the Coronavirus Emergency Management Committee and/or the Committee for the application and verification of the company's anti-infection protocol to agree on and implement any corrective or improvement measures.

The management of the coronavirus emergency did not interfere with the ordinary health and safety activities. Indeed, the obligations arising from the application of the Consolidated Health and Safety at Work Act (Italian Legislative Decree No. 81/2008) have been fulfilled in accordance with the procedures permitted by the protocols (e.g. videoconference meetings) and in good time (albeit delayed by the implementation of the provisions connected with the emergency).

For both companies, initiatives continued to maintain and improve the training courses.

4.2.1 Accident indices

GRI indicator 403-2

The data collected in these analyses confirm that the number of accidents that occurred during 2020 should be considered low and with a seriousness and frequency impact of close to 0. The only type of accident that occurred during the year was commuting accidents, with 2 non-serious road accidents suffered by employees travelling to work.

This indicates that the risk associated with the mere work activities in which the employees are daily employed is extremely low and is due to unforeseeable accidents that can occur during the day (bruises, slipping), which are unrelated to the intellectual work they carry out.

The figure relating to the frequency index and the severity index is shown below.

Frequency index = no. of accidents x 1,000,000 / no. of hours worked

The frequency index in 2020 was **0.39** (including commuting accidents)

The frequency index in 2020 was **0** (EXCLUDING commuting accidents)

Severity index = no. of total accident days x 1,000 / no. of hours worked

The severity index in 2020 was **0.05** (including commuting accidents)

The severity index in 2020 was **0.04** (EXCLUDING commuting accidents)

Accident means any accident with regard to which all procedures have been completed and for which formal notification has been received from INAIL for the granting of compensation.

Accidents (excluding accidents) at work commuting by Group employees	2020	2019	2018
Accidents suffered by Group employees	0	8	3
Of which women	0	6	3
Days lost due to accident	192	199	111
Of which women	123	176	111
Cases of occupational disease	0	0	0
Group accident frequency index	0	1.31	0.53
Female accident frequency index	0	0.98	0.53
Group accident severity index	0.04	0.03	0.02
Female accident severity index	0.02	0.03	0.02
Average Days Lost	0	25	37

Based on this analysis, we can see and confirm that the environment where Group employees work is extremely protected and safe, partly thanks to the particular attention which the Group pays to internal safety aspects. The analysis includes both the Italian and foreign workforces.

Work-related fatal accidents

In 2020, the number of work-related fatal accidents in the various national and foreign offices of Exprivia and Italtel companies was zero.

This figure shows that the risk related to working activities and the environmental risks associated with the workplaces are irrelevant. The indicator result also shows that the work environment is safe and controlled, thanks also to the special attention paid to safety and to the maintenance of company offices.

Violations and sanctions associated with occupational health and safety

In 2020, no events and incidents occurred at national or international offices which led to violations and sanctions associated with occupational health and safety. The figure shows the attention paid by the company to prevention as regards workers' health and safety and its ongoing commitment to ensure compliance with current legislative and regulatory provisions at all times.



5. Work

GRI indicator 102-8

Human resources constitute a strategic asset for the Group, are essential to the company's existence and represent a critical factor for competing successfully on the market. Honesty, loyalty, ability, professionalism, flexibility and expertise are some of the decisive factors for achieving the Group's objectives.

Through the course of the employment relationship, the **Exprivia Group** undertakes to create and maintain the necessary conditions in order for the culture, ability, knowledge and skills of everyone to develop and be recognised, by adopting a policy based on recognising merits and equal opportunities, making provision for specific continuous training programmes, professional updating and the acquisition of greater expertise. For this reason, the Group considers training a strategic element for the development of its staff, undertaking not only to constantly develop its training offer but also to adopt equally innovative methods for providing its courses. This certainty when it comes to professional development paves the way for joint company/employee evolution projects by improving the engagement levels of the staff. ICT companies depend greatly on the quality and level of engagement of the human resources working for them and on their flexibility to adapt to the opportunities arising from the transformation processes under way.

The second-level supplementary agreement applied to **Exprivia** and, therefore, to its more than 1,800 employees, represents the start of a process towards greater sharing of the company's goals with all employees.

Our goal is to establish the conditions for dynamic and flexible, but also happier, work, where everyone has opportunities and is stimulated in both personal and professional growth.

5.1 Significance for the Exprivia Group's activities

The evolution of the organisation and its alignment with market requirements are based on the topics of effective enhancement of human capital, a focus on quality and engagement.

Individuals are a true strategic asset for the achievement of the company objectives and development plans. Human capital has always been at the heart of the company's interests, through the development of potential, improving individual expertise and abilities and promoting discussion between managers and staff, in line with the business objectives.

These objectives represent the cornerstones of the professional skills development project, in accordance with merit-based criteria.

5.2 Employment contracts applied

The Group adopts a stable employment policy for the workers, preferring permanent employment contracts and limiting the choice of temporary contracts solely to residual accessory term activities. Around 96% of the company population has a permanent employment contract; apprenticeship contracts are included among the permanent contracts.

Contract type	2020	2019	2018
Permanent contracts	3,867	3,874	3,750
Temporary contracts	113	162	219
Total	3,980	4,036	3,969

Type of employment relationship, broken down by gender and geographical area of origin/recruitment.

Type of relationship by area	Women	Men	Overall total
Italy	9	9	18
Abroad	23	72	95
Temporary contracts	32	81	113
Italy	1,163	2,248	3,411
Abroad	85	371	456
Permanent contracts	1,248	2,619	3,867
Overall total	1,280	2,700	3,980

Details of Full-Time and Part-Time employment relationships, divided by gender, are shown below.

Type of working hours	Men	Women	Overall total
Full Time	2,523	783	3,306
Part Time	177	497	674
Overall total	2,700	1,280	3,980

In relation to GRI indicator 402-1, the Group has taken steps to comply with the CCNLs (Italian National Collective Bargaining Agreement - hereinafter "NCBA") in force and applied (Mechanical Engineering and Telecommunications) and the legislation which governs contractual terms which affect the organisation of the work and said workers. Therefore, communications have always been handled in observance of the time scales envisaged by the aforementioned legislative sources.

5.3 Turnover

GRI indicator 401-1

The rate of recruitment and termination is shown below, calculated on the total of employees, by gender and by age bracket, at the end of the reporting period.

RATE OF RECRUITMENT	2020 ITALY	2020 ABROAD	2019 ITALY	2019 ABROAD	2018 ITALY	2018 ABROAD
Men	4.70%	3.14%	10.22%	37.42%	9.7%	41.6%
Women	2.01%	0.95%	11.95%	34.78%	11.5%	47.1%
<30 years of age	2.79%	1.18%	51.68%	56.60%	50%	78.4%
Between 30 and 50	3.59%	2.69%	8.35%	35.25%	8.3%	35.4%
>50 years of age	0.33%	0.23%	2.10%	15.15%	2.1%	23.3%

RATE OF LEAVERS	2020 ITALY	2020 ABROAD	2019 ITALY	2019 ABROAD	2018 ITALY	2018 ABROAD
Men	5.48%	3.49%	11.10%	29.10%	11.9%	34.7%
Women	1.93%	1.08%	7.76%	26.09%	9.2%	32.7%
<30 years of age	3.09%	0.95%	27.83%	35.85%	27.1%	46.1%
Between 30 and 50	2.84%	3.27%	10.01%	27.50%	9.6%	34.2%
>50 years of age	1.48%	0.35%	3.42%	22.73%	9.6%	15.0%

5.4 Motivation and engagement

The success and growth of the **Exprivia Group** are directly linked to the excellence of our people; the men and women at Exprivia express their brand awareness to customers, colleagues and agents, to guarantee the image of the Company. To achieve this result, Exprivia invests in training and enhancement, establishing the conditions for a cooperative and motivating working environment. In a competitive scenario, characterised by continuous evolution, people are pushed to strive for continuous improvement thanks to a new Performance Appraisal system and renewed investment in market place training platforms, which stimulate knowledge sharing. The values of professionalism, flexibility, innovation, attention to quality and a focus on objectives constitute the crux of the Group's HR management policies.

The challenges of the reference market on which Company operates demand a special focus on professional retraining, ongoing training and innovation, applied to both technological skills and the managerial culture. In particular, during 2020 the Company launched an important training course, aimed at the entire middle management, considering that the role of the middle management represents the genuine driving force behind the professional development of our people, by involving them in managing challenges resiliently and innovatively.

The key focus on the quality of our human capital management processes, in order to improve existing business expertise and talent development, is an additional component of an increasingly integrated HR management model on which the Group is betting, to obtain qualified, motivated and engaged employees, and thus to be able to support the creation of value in the medium and long term. During the later month of 2020, the Company imposed a new career development

model based on a clear definition of the target role, supporting training and wage alignment. This process is currently being developed and when the full version is rolled out, it will guarantee, through a rolling application and transparent communication procedure, certainties with regard to career paths by fostering the development of the best talents.

5.5 Company Welfare

GRI indicator 401-2

In terms of welfare, a number of initiatives have been implemented and we tend to introduce new services each year with respect to the range available to the workforce.

In most cases, they concern advantages granted to all employees on top of those established by law and/or the NCBA. A Group management system on this issue has not yet been activated; for this reason the activities carried out by the two main Group companies are described below.

Exprivia

Since 2016, a welfare initiative has been in place aimed at the entire workforce. Exprivia People Care is the company welfare plan which enhances the total reward system by responding to an ever broader range of worker expectations and needs, not only financial. This project was created due to the company's sensitivity towards initiatives and tools that can achieve work-life balance, as well as maintain the purchasing power of the workers.

The Exprivia People Care plan

Since 2017, the Mechanical Engineering NCBA has made it mandatory to introduce a **supplementary company health policy** for all employees entitled to it. Exprivia has chosen a policy that can be extended to the entire family unit (spouse and children **even if not dependent**). It includes both the reimbursement of hospital costs and those for advanced diagnostics, specialist visits and diagnostic check-ups, including dental care. In accordance with the provisions of the NCBA, it is provided without distinction to employees with either full-time or part-time permanent contracts. For staff hired on temporary contracts, this right accrues after 6 months.

During 2020, Exprivia introduced a Dental Plan agreement for its employees with the insurance fund, Chubb, which allows them to be able to take advantage of various dental services for themselves and/or their families, by paying a monthly fee of Euro 9.58 or Euro 16.50 depending on the package chosen.

Restaurant Ticket for all the employees. The luncheon vouchers are in electronic format and the value for all is Euro 7.00 net per working day carried out in the office or at the customer's premises. Important affiliations have been implemented, during these years of operation, with large food sales chains, such as Coop and Lidl. No more useless waste of paper on paper vouchers and much easier to use. The measure is aimed at all permanent and temporary full-time employees; for part-time workers, a minimum of 6 hours/day must be worked.

Smartphones and SIMs for permanent white-collar workers (full-time and part-time), apprentices and management. The smartphones and SIMs provided permit phone calls and browsing. This is an important step towards improving our communication, both internal and with our customers.

Flexible Benefit, the company wished to supplement the amount of the benefit envisaged by Mechanical Engineering NCBA, with an additional benefit, for an overall total made available to the individual employees with the right of Euro 250 per annum. The additional part is reserved for permanent employees and is re-proportioned for part-time employees. The handling and spendability of the available benefit takes place via a platform made available by Easy Welfare, a leading company in Italy in the management of company welfare. Employees have a wide range of services available to them, which is expanded annually.

In December 2020, the company provided a further Euro 200 to each employee (in addition to the Euro 250 disbursed in June) as recognition of their efforts and the excellent results achieved. Complimentary tickets were introduced to

the range of services available in December, to be spent in the most popular market places.

In 2019, Exprivia signed an agreement with **Corporate Benefits Italia** (a leading company in Europe in the company affiliations sector), aimed at **enhancing the offer of affiliations dedicated to our employees**. The agreement provides for the creation of a portal through which our employees can benefit from an exclusive offer of company affiliations (over 180 partners, comprising prestigious brands and leading businesses) which entitle users to useful discounts from major distribution chains.

During 2020, the range of market places was expanded, granting our employees more chances to save money when making purchases.

Italtel

The Italtel Welfare plan

Italtel carries out a wide range of initiatives in the field of work/private life balance (e.g. smart working, flexible entry and leaving hours, part-time, hourly holidays), mobility (e.g. company shuttle, free reserved parking spaces, mixed-use company car) and everyday life (e.g. company canteen and restaurant vouchers, agreements and discounts, company mailroom).

In order to support smart working, the company ensures that almost all staff have a **laptop available, equipped with corporate communication tools** (e.g. video conferencing), with around 50% able to use a **company smartphone**.

A **flexible benefit** plan is also in place for the entire workforce which, for the year 2020, totals around Euro 211,000. The welfare credit made available allows employees to choose independently the types of services they can benefit from within the basket made available to the company, depending on their specific needs. It is worth highlighting the fact that, for non-management staff, the company has made a voluntary commitment that has enabled the doubling of the amount of credit due under the contractual commitments.

In Italy and abroad, all employees entitled to **maternity or paternity leave** who submitted a request were able to use this leave and returned to work once it concluded. Employees entitled to use daily leave for **taking care of disabled family members** were also able to exercise this right within the deadlines laid down by national law.

5.5.1 Right to and protection of maternity

All Group employees are entitled to use parental leave in accordance with the provisions of the law.

The Group has always striven to facilitate the work of its pregnant employees as much as possible; for example, at Exprivia's Molfetta headquarters, where there is an internal car park with a limited number of parking spaces, part of this has been allocated to pregnant employees, enabling them to enter the company site directly to make it easier to then enter the building.

The sense of belonging and well-being within the company can also be perceived from the fact that, in all cases of staff on maternity leave, more than 96% of employees returned to work after having been absent for use of mandatory and/or optional maternity leave (including by the hour); there were only 5 cases of employees who had resigned as at 31 December 2020.

Maternity support - Contact Centre Perimeter

Speaking about maternity support for working women does not simply mean discussing the work/life balance, but first and foremost talking about women.

The topic of maternity support at work, especially in private companies, forms part of the more general issue of equal opportunities and its final goal is to reduce the gender gap which involves, or rather lies at the heart of, the company's organisation.

Carrying on from 2018, with the aim of promoting and supporting working mothers, **Exprivia** SpA introduced a significant right for all mothers with children under three years of age into the company's internal regulation for the Contact Centre perimeter (in force at the Molfetta and Palermo offices). The company regulation governs the procedures for Contact Centre employees working on shifts to request exemption from certain time slots if there are proven reasons for doing so (attending study courses, medical treatments prescribed at certain times, other part-time work).

5.5.2 Absenteeism

GRI indicator 401-3

All Exprivia Group employees can enjoy social cover for cases of absence due to illness and hospitalisation.

The following table shows the % of absence due to illness and hospitalisation, divided by company and by gender.

Rate of absenteeism ⁵			
Company	Women	Men	Total
Exprivia S.p.A.	1.74%	1.36%	1.47%
Projects S.r.l.	4.05%	3.84%	3.98%
ITALTEL S.p.A.	1.76%	0.97%	1.14%
	2.43%	1.41%	1.73%

The rate is relatively low compared with the average in the sector and the final average takes account of certain higher rates caused by serious (non-professional) illness, which extended into 2020.

5.6 Training

GRI indicators 404-1; 404-2

Staff represent a true strategic asset for the **Exprivia Group** for consolidating and improving its competitive edge over time. In order to enhance its human capital, the Exprivia Group makes suitable tools and professional growth opportunities available, ensuring the quality and innovation objectives of the products and services provided to customers.

The Exprivia Group constantly encourages its workers to achieve levels of excellence, extending their technical and management skills while not neglecting motivation, a sense of belonging and responsibility. The high level of professionalism of the individuals who work within the Exprivia Group has enabled it to develop an excellent reputation in Italy and internationally. To this end, staff training courses are designed for the purpose of facilitating individuals in reaching increasingly challenging goals and achieving successful performances.

The significant growth of the company has also involved the training area, which must guarantee the level of professional compliance of the personnel with the current and potential medium- and long-term market.

Moreover, the new developments in training, entailing an evolution towards e-learning, above all during this global pandemic, are making training into a continuous and flexible process.

The possibility of accessing content continuously and permanently is becoming essential. During 2020, we re-evaluated the provision of and access to training using remote procedures (98% of our training was provided remotely) and innovative

⁵ The coefficient is obtained from the formula: no. annual working hours / no. hours of absence for illness / hospitalisation %.

solutions (scorm, storytelling, gaming); this process began in 2019 and will evolve during 2021.

One of the most significant training initiatives that guarantees continuity and flexibility has been the adoption of the Udemy training platform in 2019. This platform, applied alongside traditional education, offers a constantly updated marketplace of over 100,000 courses and online videos. During 2020, the user accounts available to employees increased by 39%. This initiative was appreciated by our staff, who made considerable use of it to improve their expertise, in a way closely and swiftly connected with requirements emerging during work activities.

Moreover, the training programmes envisage measures for developing organisational conduct and actions that increase technical knowledge and skills in support of technological innovation and development programmes. The training programmes are planned in close association with the needs of the market and innovation investment.

Training within the Exprivia Group is also planned with the support of the **Corporate Business School Spegea**, an accredited Italian management school. Its presence within the Exprivia group makes it possible to:

- continuously renew the wealth of abilities and skills of the human resources as a strategic asset;
- adopt increasingly innovative training methods and models, thanks to the Corporate School's unstinting focus on innovations within the reference market.

The 2020 training programmes covered the development of:

- **TECHNICAL AND SPECIALISED SKILLS:** measures that increase technical knowledge and skills to support technological innovation and development programmes, through specialised training activities also aimed at obtaining certification. These specialised interventions were fully disseminated, in the belief that working on skills means increasing the value of people and, therefore, the organisation's competitive advantage. In particular, after the 2019 objective, which involved reaching a Partnership with AWS Select, the goal for 2020 was an Advanced Partnership, which was achieved in June 2020.
- **MANAGEMENT SKILLS:** aimed at improving organisational conduct for the development of professional skills, project management and the development of conduct that contributes to determining a precise leadership style for handling working teams, in order to improve management effectiveness. 2020 also saw a considerable focus on training with a view to developing a Project Management culture and expertise. Moreover, the professional family of the staff was also involved in developing this expertise, by generating awareness and useful know-how both in managing staff processes and improving the support provided to the company's project managers, thanks to a better culture and paying attention to time frames, costs and quality. The initiative proved very successful and was greatly appreciated by the learners. At the same time, we made a major training investment in Agile Project Management issues. In addition, 2020 saw a particular increase in managerial training (Master, Project Management, development of Business Models), with a particular focus on the training and development of our Middle Management. In line with this process, against a background of major change such as that we are experiencing now, it has become urgent to develop the managerial skills of our middle management. The need to develop flexibility, engagement (even more so in a context of remote working) and focusing on objectives has made it necessary to improve our managers' effectiveness and ability to influence their employees. Over 100 managers were thus involved in a training course launched in 2020 which will be completed during 2021. The course begins with a digital assessment right at the beginning, followed by virtual classrooms, virtual coaching and a final digital assessment to understand the developments within the course.
- **LANGUAGE SKILLS:** training activities were carried out to increase the staff's language skills, with particular attention paid to flexible training (e-learning, Skype lessons and phone lessons).

With regard to REGULATORY COMPLIANCE, training covered:

- the development of knowledge and the awareness of behavioural rules connected with ethical values (pursuant to Italian Legislative Decree 231/01) in the foreign sites in Spain;
- fundamental management processes of the Group's integrated QMS. In particular, training sessions have been organised around the Project and Associated Risk Management Procedure, extended to a large part of our Project Managers; we will continue to roll out this project in 2021. Within the context of MANDATORY TRAINING, training

activities focused on the following topics:

- Protection of health and safety at work (pursuant to Italian Legislative Decree 81/08)
- GDPR (General Data Protection Regulation) - Privacy Regulation (EU 2016/679).

Training delivered in 2020 totalled 57,625 hours (5,447 of which in foreign offices), involving 15,193 participants. 98% of the total number of training hours were delivered online.

Particular attention is paid to the aspect of training financing: in fact, all the possible sources of funding are used thereby guaranteeing the sustainability of the investments. In particular, the financing trend at Exprivia has grown from 30% to 48% since 2019. Within the Italy scope of the Group, the financing percentage has risen from 30% to 32%.

Main information about **all the training provided** and an indication of the average hours of training by gender and by category:

2020	Gender		Category			Total
	Women	Men	Management	Middle management	White-collar workers	
Hours	23,883	33,741	475	6,852	50,299	57,625
Personnel (Italy + abroad)	1,280	2,700	81	512	3,387	3,980
Average training hours	19	12	6	13	15	14

2019	Gender		Category			Total
	Women	Men	Management	Middle management	White-collar workers	
Hours	27,342	54,457	852	11,457	69,490	81,799
Personnel (Italy + abroad)	1,288	2,747	90	508	3,437	4,035
Average training hours	21	20	9	23	20	20

2018	Gender		Category			Total
	Women	Men	Management	Middle management	White-collar workers	
Hours	25,910	40,396	2,070	5,364	58,872	66,306
Personnel (Italy + abroad)	1,232	2,736	88	521	3,359	3,968
Average training hours	21	15	24	10	18	17

The numbers shown below consider **mandatory training** only:

2020	Gender		Category			Total
	Women	Men	Management	Middle management	White-collar workers	
Hours	1,170	3,729	11	439	4,449	4,900

Personnel (Italy + abroad)	1,280	2,700	81	512	3,387	3,980
Average training hours	1	1	0	1	1	1

2019	Gender		Category			Total
	Women	Men	Management	Middle management	White-collar workers	
Hours	3,501	10,682	221	2,122	11,839	14,182
Personnel (Italy + abroad)	1,288	2,747	90	508	3,437	4,035
Average training hours	3	4	2	4	3	4

2018	Gender		Category			Total
	Women	Men	Management	Middle management	White-collar workers	
Hours	3,010	8,181	841	1,153	9,197	11,191
Personnel (Italy + abroad)	1,232	2,736	88	521	3,359	3,968
Average training hours	2	3	10	2	3	3

5.7 Professional certifications

Certifications make it possible for each business unit to have a wealth of objective and measurable professional skills, ensuring their customers certification of the technical abilities of the individuals involved in the projects. Furthermore, for the purposes of participation in tender calls, it is indispensable to be able to employ and rapidly handle all company and individual certifications. In 2020, 630 certificates and specialisations were issued/renewed, increasing the number of certificates issued during the year fourfold compared with 2019. This increase is due to a major investment in innovative areas to support investments associated with the business plan, with 21% of the workforce now certified.

5.8 Connection with the education and training system

For two years, the Group has been supporting school training through School/Work Projects. However, in 2020, the Group companies have been able to offer very limited hospitality and only at the start of the year, for clear reasons connected with the pandemic period (in particular, Italtel has started a school/work programme for 16 pupils from Technical Institutes in the Milan hinterland, but was unable to continue with the project).

We now have an increasing number of well-established partnerships with universities and polytechnics, including: the University of Pavia, the Milan Polytechnic, the Milan State University, the Bocconi University of Milan, the La Sapienza University of Rome, the Luiss Guido Carli University, the University of Bari, the Bari Polytechnic, the LUM University of Bari, the University of Salento, the Ecampus University, the Federico II University of Naples, the University of Calabria, the University of Siena, the University of Trento and the University of Palermo.

In 2020, some 17 trainees were managed in partnership with Italian universities and polytechnics, using both face-to-face and remote solutions.

Moreover, as a member of the Elis Consortium, Italtel has participated in Elis' 'School-Business System' project, launched in 2018 and completed in 2020. The aim of the project was to reform today's education model from various perspectives, in line with the professions of tomorrow and the skills sought by companies. Discussions between students and female 'role models', i.e. company professionals who embody virtuous models of approaches to work, which can inspire boys, and especially girls, to undertake a career in STEM (Science, Technology, Engineering and Mathematics), is the distinctive characteristic of the process of recognising talents and vocations. Italtel has participated actively by involving five professional companies in the project as 'role models'.

The Talent Acquisition programmes are continuing, with the interest and involvement of the Higher Technical Colleges System; In particular, the two-year Developer 4.0 cycle concluded in 2020.

Other Higher Technical College courses, provided in cooperation with Exprivia, were carried out in full during 2020, making us an active part in classroom teaching and tutoring, both remotely and face-to-face; during 2020, over 2,200 hours of teaching were provided, and no fewer than 45 trainees were supported through their 720-hour professional courses, 25 of whom will complete their course during 2021.

During the final quarter of the year, we were delighted to recruit the first 23 Higher Technical College graduates at Exprivia.

Another important tool activated by Talent Acquisition remains the Academy; once again in 2020, certain projects were launched, concerning the ERP SAP and Healthcare company factories.

5.9 Performance evaluation

GRI indicator 404-3

Performance Evaluation is a process that assigns personal quantitative goals which, together with an assessment of most relevant organisational behaviour, helps to improve individual, and thus company, performance.

The Performance Evaluation process is conceived as an opportunity for all (managers and employees) to have in-depth and constructive exchanges of views aimed at defining the activities and commitments against which they must measure themselves during the year.

The assessment is expressed through Performance Appraisal and Evaluation processes according to the Management by Objectives (MBO) model illustrated below. It should be noted that they have not been adopted uniformly by Exprivia and Italtel:

Performance Appraisal

- assessment of individual quantitative objectives;
- assessment of qualitative objectives connected with organisational behaviour;
- Management By Objectives (MBO)
- assessment of individual quantitative objectives
- assessment of budget objectives

The Performance Appraisal is implemented on the Talentia Human Capital Management platform and applies only to the Italian scope.

For **Exprivia**, the process was subject to certain modifications in 2020 and the new version was applied to the Talentia HCM system. For this reason, the relevant table will show, for Exprivia, only the sheets produced in 2020 for assignment; the sheets for assessment will be produced around March/April 2021 and therefore included in the next report.

As regards **Italtel**, the system has been active for some time and has been implemented continuously, without the customisations produced by Exprivia. For this reason, the data shown for Italtel refer to the sheets assessed in 2020 (2019 assignment), since the system was not launched for Italtel in 2020.

The Performance Appraisal table shows (for both companies) the number of staff intended for the qualitative/quantitative

evaluation programme, which is not linked to the rewarding system.

For **Exprivia**, as regards the MBO system, it should be noted that the assessment of individual quantitative objectives is measured through an individual MBO sheet and is associated with the salary review with respect to the career path. The assessment of the budget objectives is connected with the company's bonus system and based on assessment of the structure's economic and financial indicators. For the Italy scope, both number have been shown, while only the second type if provided for the abroad scope.

For **Italtel** the MBO system is connected exclusively with the reward system. It is implemented on the HCM platform and was not implemented for the Italy scope in 2019-2020 but only for the abroad scope.

The MBO table (for both companies) shows the number of resources that will benefit from the MBO programme (Italy and Abroad), connected with the reward system, and was designed with a view to economic sustainability.

The tables shown below contain a comparison with the previous years. However, it should be noted that, because of the aforementioned differences, the Performance Evaluation processes (Appraisal, MBO) data for Exprivia and Italtel are not directly comparable.

The Performance Evaluation data concern solely the Group's core scope. Therefore, the % calculated are evaluated with respect to the Italy workforce, excluding the following Group companies: HR Coffee, Exprivia Projects, Spegea Scarl.

Tables – Performance Management

Employees covered by annual review - Performance appraisal – ITALY	2020	2019	2018
% of total workforce Italy	58%	35%	28%
of which Management	7%	21%	46%
of which Middle management	39%	45%	47%
of which White-collar workers	63%	33%	25%
of which Men	58%	38%	33%
of which Women	57%	26%	18%

The Performance Appraisal table shows a considerable rise in % due to the Exprivia's adoption of the HCM platform, which has enabled a broader dissemination of the evaluation programme.

With regard to the MBO Italy system, it should be noted that, despite the clear decrease, the value should be viewed positively if we consider that the process was only implemented by **Exprivia**. When calculating the %, account was taken of the number of evaluations, rather than the number of individual employees.

There has been a slight improvement in the abroad scope.

In the tables, the numbers represented for the differences in gender are consistent with those indicated in the rest of the report.

Employees covered by Performance Assessment - MbO	ITALY	ITALY	ITALY	ABROAD	ABROAD	ABROAD	ITALY	ITALY	ITALY
	2020	2019	2018	2020	2019	2018	ABROAD	ABROAD	ABROAD
	2020	2019	2018	2020	2019	2018	2020	2019	2018
% of total workforce	4%	5%	5%	41%	38%	35%	10%	11%	9%
of which Management	16%	28%	19%	50%	60%	100%	21%	33%	27%
of which Middle management	8%	15%	14%	54%	58%	61%	12%	20%	19%
of which White-collar workers	3%	2%	3%	39%	35%	31%	10%	8%	7%
of which Men	5%	6%	6%	39%	40%	37%	11%	12%	10%
of which Women	2%	4%	3%	47%	33%	28%	8%	8%	5%

5.10 Smart working

Smart working at **Expri^{via}** takes the form of a new approach to company organisation, where the individual needs of the worker balance, in a complementary manner, those of the company. This new way of executing the employment relationship is characterised by a lack of working hours or spatial restrictions and by work organisation that reconciles the personal and professional requirements of the employees. In order to implement this innovative vision of the organisation of work, a culture characterised by the following is fundamental: sharing of values and principles of trust and transparency; widespread communication, cooperation, accountability and decision-making autonomy, as well as a growing focus on results.

In June 2018, Expri^{via} launched a smart working programme, which was signed up to by around 350 employees (as at February 2020).

With the arrival of the COVID-19 pandemic, between February and April, Expri^{via} enabled around 90% of the workforce to work remotely, and the measure was also implemented in Expri^{via} Projects (a company which had never previously used smart working).

On-site work (company or customer sites) was only permitted for those whose activities were incompatible with smart working.

The company constantly renewed its smart working arrangements in line with the various Prime Ministerial Decrees issued and provided the workforce with clear communications and reports on safety in compliance with the indications from INAIL (the Italian National Institute for Insurance against Accidents at Work).

In consideration of the state of emergency, the Prime Ministerial Decrees enabled the use of smart working even when there were no individual agreements with the employees. In general terms and in line with the particular situation, reference was made to certain smart working guidelines already included in our regulations.

Reduction of CO2 emissions

At **Expri^{via}**, as a result of the Smart Working days used (approximately 330,000 days), around 20,000,000 km and 430,000 hours (equal to around 50,000 working days) were saved during 2020, with a decrease in CO2 emissions of around 8,000,000 kg.

At **Italtel**, a total of 138,000 Smart Working days were used in 2020, resulting in an estimated reduction of around 7,700,000 km and 206,000 hours (equal to some 27,500 working days) in terms of commuting, together with a reduction in CO2 emissions of around 1,600,000 kg.

* in any case, the values are estimated based on the figures available and the averages used.

5.11 Industrial Relations

The Group has always maintained open and transparent relations with trade unions and workers' representatives. It believes that it is possible to provide solutions that are better balanced with the needs of all stakeholders only through continuous and constructive dialogue. The activities under way with trade unions and workers' representatives in the Group's two main companies are shown below.

Exprivia

Exprivia is involved in ongoing negotiations with workers' organisations at national and local level. For this purpose, the Group has established a specific unit within the Human Resources Division. 2020 was marked by the establishment of a committee composed of the Head of the Prevention and Protection Service, the Company Physician, the Industrial Relations Manager, Workers' Safety Representative (WSR) for the monitoring of health protection and prevention initiatives connected with the COVID risk.

Periodic meetings were held during March-July (weekly or fortnightly) in which data were presented and anti-COVID risk safety initiatives shared.

The Committee meetings and periodic meetings were held for both Exprivia SpA and Exprivia Projects.

Between March and December 2020, Exprivia SpA and Exprivia Projects made use of social safety nets because of COVID; such use required both companies to fulfil the relevant trade union procedures which call for the issuing of information to the Trade Unions, joint analyses and (non-binding) agreements.

The agreements laid down the Company's advance payment of the wage subsidies under the INPS (Italian national social security body) to the workers concerned.

With regard to Exprivia SpA alone, there was also the monitoring/execution of the supplementary agreement signed in 2018. Therefore, certain meetings were held to discuss the introduction of the Performance Bonus during which the Trade Unions were provided with the results achieved in 2019, set as targets for the payment of the performance bonus. Based on the provisions of the 2018 agreement, it was not possible to pay the PB as the set targets were not reached. During these meetings, the trade union representatives were provided with the targets for 2020 which, if achieved, would enable the payment of the bonus for 2021. In particular, a different criterion for achieving the targets was defined with the trade union organisations.

Other aspects were also shared, such as collective closures and funded training courses. Specifically, the month of November saw the signature of a trade union agreement allowing Exprivia to seek admission to the Fondo Nuove Competenze (new skills fund) tender procedure, which finances the cost of work for the hours of training followed by the staff seeking professional retraining. For this purpose, ad hoc training courses were identified, which will allow staff with a skills gap to bring themselves in line with the standards required by the market and our customers.

During 2020, under the auspices of Exprivia Projects, in addition to the aforementioned points connected with the COVID-19 emergency, various meetings were held with the trade union representatives and territorial secretariats with the aim of resolving a number of organisational/operational problems affecting the staff operating at the Molfetta and Palermo sites. In the majority of cases, solutions were found which helped improve the organisation of the work at the sites and restored well-being to the workers.

With regard to the Palermo site, a trade union agreement was signed in July with the aim of ensuring optimal

economic/contractual conditions for the workers.

Italtel

After the Court of Milan rejected the appeal on the grounds of anti-union conduct brought by the Trade Union Organisations FIOM CGIL, FIM CISL and UILM following the Company's cancellation of certain second-level supplementary contracts, during 2019, a Group of 129 employees from the company sites of Settimo Milanese, Rome and Carini submitted a series of appeals before the Court of Milan, using the same lawyers as the Trade Union Organisations that had challenged the cancellation pursuant to art. 28.

The Court of Milan, having determined both the subjective connection, with the proceedings brought against the same respondent and with the help of the same defence lawyers, and the objective connection, with the appeals relating to the same facts and same legal questions, ordered that all the cases be combined into one proceedings.

On 16 December 2020, the Court of Milan rejected the appeal lodged by the 129 employees, apportioning the legal costs equally between the parties. The grounds for the ruling have not yet been filed.

Since 11 May 2020, the Company has relied upon the state fund for redundancy subsidies due to COVID-19, using 28 weeks of social safety nets during 2020.

On 4 May 2020, a trade union agreement was signed on the criteria for use of the state fund for redundancy subsidies due to COVID-19, which stipulates, inter alia:

the Company's advance payment of the wage subsidies under the INPS (Italian national social security body) to the workers concerned

the full accrual of the deferred institutions (additional monthly salary payments, holidays, paid annual leave) including during the period of suspension from work because of the state fund for redundancy subsidies.

The trade union agreement referred to the first nine weeks of the state fund for redundancy subsidies. In any case, the company continued to apply it during subsequent weeks, since it proved impossible to reach a new agreement with the trade union organisations because of the different points of view, including within the trade union itself, regarding the procedures for applying the safety net.

5.12 Management Systems and Certifications

We believe that sustainability is an indispensable value for the Exprivia Group, which is reflected in respecting people, the environment and society as a whole.

Certifications	Object
ISO 9001, ISO 13485 and CE marking (MDD), ISO 14001	The Quality Management Systems are certified in accordance with the ISO 9001 standard to define, maintain and improve the company processes by gradually identifying new objectives consistent with those of the highest levels defined in the Quality Policy. For the design and development of the Exprivia medical systems, ISO 13485 and the medical devices directive have been adopted. ISO 14001 certifications enable identification and minimisation of the environmental impacts of production activities.
ISO/IEC 20000-1, ISO/IEC 27001 and ISO 22301	They make it possible to adopt the best practices in the sector and ensure ever greater satisfaction of the needs of stakeholders.

ISO 18295

The standard provides a framework applicable to any Contact Centre – both inbound and outbound – which wishes to satisfy the requirements and expectations of all the stakeholders involved (principal, users, operators of the Contact Centre), while continuously improving performances by using the results of the KPI defined. The certification – which is of a service rather than a management system – was obtained in 2018 and constitutes a distinctive plus (compared with ISO 9001 certification) for customers who wish to commission Contact Centre services.

Both organisations seek to extend the processes and best practices used in Italy at international level, by appropriately adjusting them to the relevant national context, so that others may gain from the improvement actions identified over years of experience.

The management systems are periodically subject to audit, both internal and external, aimed at periodically checking the state of application of the system and its compliance with the reference norms and with applicable legislation.

6. Environment

GRI indicator 102-29

The Exprivia Group, in the firm belief that the quality of the environment affects the quality of life and economic development, has decided to comply voluntarily with the UNI EN ISO 14001 standard, by defining and implementing Environmental Management Systems compliant with the requirements of said standard.

Two Environmental Management Systems (EMS) have been implemented and are active, ensuring a systemic approach to the ongoing improvement of environmental performance and, indirectly, the reduction of the applicable risks.

In 2007 Exprivia obtained certification of the EMS for its Molfetta premises in accordance with the ISO 14001 standard, maintaining validity to-date. Similarly, in Italtel's Carini Industrial District, certification of the Environmental Management System was confirmed in accordance with the ISO 14001 standard (held since 2001).

In 2019 both Exprivia and Italtel provided ENEA with an Energy Audit for the Exprivia sites of Molfetta and Rome (Bufalotta) and the Italtel sites of Castelletto and Carini, last conducted in 2015, in accordance with Italian Legislative Decree no. 102/2014 'Energy Efficiency', encompassing Energy Efficiency Programmes during the four-year period of validity of the audit.

In compliance with the provisions as per Italian Legislative Decree No. 81 dated 2008 and any other legislative relevant provision, Exprivia and Italtel undertake to protect the workplace safety and health of the individuals, adopting all necessary and appropriate measures for ensuring full compliance of the workplaces with the highest standards regarding safety and hygiene.

6.1 Significance for the Exprivia Group's activities

Exprivia and Italtel are IT/TLC services companies, whose production processes involve *human intensive* features where the human production factor prevails rather than the machinery. Their sensitivity with respect to health and safety in the workplace aspects and environmental matters, and in particular the problems posed by climate changes at global level, is however high.

6.2 Management activities and results

With regard to the EMS, the main improvement actions for the environmental performances carried out over the last few years by Exprivia and Italtel were:

- Containing the consumption and waste and optimum running of the systems in relation to the season;
- Technological innovation by means of the virtualisation of IT equipment in the areas for CED/Testplant use, *free-cooling* procedures and the use of energy-efficient UPS and power stations;
- Monitoring of consumption (i-Energy Service Centre) and implementation of performance indicators;
- Adoption of policies to raise awareness of consumption and of campaigns for the removal of redundant loads;
- Technological investments with activities for the *revamping* of air-conditioning systems and installations of new, more efficient thermal plants; Elimination of inefficient systems with impact also on lower volumes of water used;
- Rational use of space through industrial concentration activities or change of facilities, aimed at optimising areas used and air-conditioned volumes;
- Attention to water, paper and toner consumption;
- Use of flow reducers for wash basin taps in the restrooms;
- Preferential use of trains instead of planes for business trips within the country (lower emissions).

6.3 Environment, surveys and trend in consumption

GRI indicator 302-1

The data provided are aggregated and refer to 2020.

The use of **generalised smart working** since March 2020 – as a result of the management of the COVID-19 emergency – led to a saving in consumption connected with the carrying out of work activities in the company offices and a resulting reduction in the percentage changes of the values of the indicators measured in 2020 compared with the previous year. Moreover, **the value of the FTE** has been reconfigured to take account of the reduced presence – in both the Italian and foreign offices – of company personnel present in the office on average, using the following data for the reconfiguration criteria:

- Data on the average daily presences provided by the contact persons from the Italian offices monitored or for which there is a recognition criterion based on objective data (e.g. meals provided in the canteen);
- Estimates of the average daily presences for the other Italian offices, obtained through extrapolation from the offices referred to in the previous point;
- % Number of prints made in 2020 / Number of prints made in 2019 at the foreign offices of Italtel within the scope.

The following shows the breakdown of energy consumption expressed in GJ⁶ (gigajoules) per type of energy carrier used, for the years 2020-2018.

Energy consumption by type in GJ	2020	2019	2018
Electricity	88,344	108,454	111,959
Methane	8,807	8,662	7,978

⁶ The following aspects are highlighted:

For Exprivia's Rome office, in via della Bufalotta, it was not possible to obtain the Electricity and Methane consumptions from the building management (the figures will be available from April 2021) for the air conditioning. Therefore, the Electricity and Methane consumptions from 2019 were considered and cut by 20% considering the reduced presence in the office as a result of the generalised smart working.

Fuels/Diesel	468	3,903	2,023
LPG	1,878	3,390	5,389

Electricity was the primary energy carrier for 2020, with a share of 89%, corresponding to 88,343.95 GJ, followed by fuels - Methane (8,819.61 GJ), LPG (1,877.61 GJ) and lastly Motor Fuels/Diesel (467.80 GJ).

6.3.1 Greenhouse gas emissions

The following tables show the t CO₂eq referring to direct and indirect emissions by type of vector used (GRI indicators 305-1 and 305-2).

Scope 1 (Direct GHG emissions - GRI indicator 305-1)

The indicator measures the direct emissions of the organisation (e.g. fuels, chemical processes, process emissions, oxidations, fuel for heating), including those related to energy carriers used other than electricity.

The values for 2020 direct emissions are shown in the following table, together with deviations compared with the values from previous years.

DIRECT EMISSIONS (SCOPE 1)	Italy 2020	Abroad 2020	2020	2019	2018
TOTAL CO ₂ eq EMITTED (tonnes)	3,441.0	57.1	3,498.0	3,207.1	1,556.4
% change			9%	106.06%	n.a.
Cumulative % change			125%	106.06%	n.a.
CO ₂ eq METHANE (tonnes)	506.8	0.0	506.8	484.7	446.4
CO ₂ eq LPG (tonnes)	30.7	0.0	30.7	222.6	348.7
CO ₂ eq FUEL (tonnes)	67.1	57.1	124.1	257.7	133.7
CO ₂ eq from F-GAS	2,836.4	0.0	2,836.4	2,242.1	627.6

The foreign offices – of both Exprivia and Italtel – do not envisage any Methane and LPG consumption.

The percentage change is influenced by the increased emissions of CO₂eq relating to the F-GAS from the Italian offices of Italtel (rising from 1,931.81 t CO₂eq in 2019 to 2,606.66 in 2020), offset by a reduction in emissions relating to LPG and Fuels.

Scope 2 (Indirect GHG emissions - GRI indicator 305-2)

The indicator measures the indirect emissions from energy consumption (e.g. heat, electricity, steam purchased from third parties).

The following table shows the value of indirect emissions measured for 2020 and the changes compared with the values from the previous years.

INDIRECT EMISSIONS (SCOPE 2)	Italy 2020	Abroad 2020	2020	2019	2018
CO ₂ eq ELECTRICITY (tonnes)	4,338	231	4,569	5,704	6,383
% change			-19.9%	-10.6	n.a.
Cumulative % change			-28.4%	-10.6	n.a.

Scope 3 (Other indirect GHG emissions - GRI indicator 305-3)

The indicator measures the other indirect emissions which do not fall within scope 2 (e.g. emissions from the supply chain, business trips, home-work journey of employees).

Only business trips were considered, and the emissions associated with journeys made by own or company vehicles were considered only for Italtel's Italian offices.

The following table shows the values measured for 2020, broken down by means of transport used, and a comparison with previous years.

INDIRECT EMISSIONS (SCOPE 3)	Italy 2020	Abroad 2020	2020	2019	2018
TOTAL CO2eq EMITTED (tonnes)	369	99	467	1,983	2,467
% change			-76%	-20%	n.a.
Cumulative % change			-81%	-20%	n.a.
Flights	140.4	82.0	222.5	969	1,185
Rails	70.7	1.4	72.1	303	268
Hotels	35.8	14.9	50.8	243	133
Cars	121.7	0.3	122.0	467	633

ExpriVia and Italtel pursue the reduction of journeys by encouraging employees to use remote means of communication and work. Nevertheless, specific business requirements call for the staff to make business trips both in Italy and abroad, which, in 2020, took place almost exclusively during the period January-February 2020 (i.e. before the restrictions caused by the COVID-19 emergency).

The greatest portion of CO2 emitted in relation to business trips is due to flights and represents 48% of the total.

The intensity of the GHG emissions in relation to company staff (**GRI indicator 305-4**) comes to 0.590t CO2/FTE in 2020, compared with the 0.632 in 2019, a variation of -6.6%.

6.4 Sewage and Waste

The only sewage produced is that from the waste water sewers from the bathrooms.

The estimated quantity of litres of waste water sent to the sewers (**GRI indicator 306-1**) came to 14,589.65 cubic metres in 2020. This figure is based on an average consumption of drinking water - per employee - for the toilets of a production site, excluding Italtel's Italian offices which have specific discharge meters.

In 2019, the quantity of litres of waste water released into the sewers totalled 44,087.69 cubic metres. There was thus a change of -66.9% compared with the 2019 figure and one of -72.2% compared with 2018.

The special hazardous waste produced is mainly waste from electrical and electronic appliances deriving from the use of IT equipment (e.g. monitors, laptops, etc.), electrical and electronic equipment (e.g. UPS) and from company structures/infrastructures (e.g. neon for lighting). These types of waste were handed to authorised disposal suppliers.

Ordinary waste is disposed of by specialised companies and the amounts shown in the sheets are then noted on the Environmental Declaration Forms.

Waste produced by foreign offices was not taken into account, since it is not very significant compared to the total produced.

WASTE (kg)	Exprivia Italy 2020	Italtel Italy 2020	Total Italy
Non-hazardous waste	5,812	122,273	128,085
Hazardous waste	2	0	2
Total waste	5,814	122,273	128,087
Non-hazardous waste for disposal	3,340	122,273	125,613
Non-hazardous waste for recovery	2,472	0	2,472
Hazardous waste for disposal	0	0	0
Hazardous waste for recovery	2	0	2

6.5 Compliance with legislation in force

GRI indicators 307-1; GRI 417-1

With regard to the products developed by **Italtel**, those distributed in all the Italian and foreign offices are certified according to safety and EMC standards and are built according to criteria designed to minimise environmental impact (e.g. RoHS Directives - *Restrictions of certain Hazardous Substances*). In this regard, Italtel S.p.A., which is enrolled in the Register of Producers of Electrical and Electronic Equipment, ensures compliance with European Union requirements (WEEE - *Waste Electrical and Electronic Equipment*) - implemented in Italy by way of Italian Legislative Decree 49/2014 "RAEE" (Waste from Electrical Equipment and Electronics) - on the disposal of products at the end of their life cycle. Italtel S.p.A. reports on a quarterly basis the amounts of wood, plastic, paper and steel making up the packaging it places on the Italian market, and pays the Environmental Fee to the CONAI (National Packaging Association) companies pursuant to Italian Legislative Decree 152/06. With reference to the European 'REACH' Regulation 1906/2007 (*Registration, Evaluation, Authorisation and Restriction of Chemicals*), Italtel checks the compliance of its suppliers, requesting proof of the percentage concentrations of highly hazardous substances and of the relevant Authorisation for Use issued by the European Chemicals Agency (ECHA).



7. Fight against corruption

The Group undertakes to prevent any discrimination related to age, gender, health conditions, race, political opinions and religious beliefs in the company's processes (such as personnel selection, supplier selection, personnel management). Ensuring the utmost loyalty in every relationship, whether internal or outside the company, keeping our word, and delivering on promises and agreements, even in the absence of written proof, are key values for the Group. The Exprivia Group bases the performance of its activities on principles of transparency and clarity of information. The group believes in fair competition as an essential tool for protecting consumers. To this end, it undertakes to operate with the utmost fairness and ensure full respect of its competitors, and not to engage in any conduct that could lead to taking advantage of any dominant positions.

7.1 Loyalty, trust and conflicts of interest

In 2019, in order to ensure better protection of the identities of the persons involved, in line with the requirements of the General Data Protection Regulation (GDPR), the Group launched a suitable IT platform released for the management of reports, which can be accessed both from the intranet and the websites of the respective companies, able to guarantee the maximum levels of confidentiality and privacy for reporting irregularities at work (whistleblowing). This system is managed by the Internal Audit functions at Exprivia and by the Compliance Office at Italtel. In 2020, as in 2019, there were no reports of violation of the respective Codes of Ethics at Exprivia or Italtel, nor were any offences reported. No conflict of interest was found in 2020, just like in 2019.

7.2 Fair competition and respect for legality

The Group operates with a number of parties (customers, suppliers, partners, etc.), maintaining relationships characterised by the utmost transparency and loyalty.

In 2020, as in the two previous years, no Group company received any complains concerning non-compliance with laws and regulations on social or economic matters, nor were any sanctions imposed against them due to infringements of regulations on product safety, industrial and intellectual property, misleading advertising, regarding information on products in communications and, in general, in marketing activities, nor for anti-competition conduct. In 2020, as in the two previous years, there were no complaints from customers nor other parties concerned by privacy. However, there were four request from data subjects to exercise their rights with respect to Exprivia, all correctly managed in accordance with the legislative provisions and time frames, in particular:

- two requests to exercise the right to erasure received from data subjects (former candidates to the selection procedures for recruitment) pursuant to Art. 17 of the GDPR;
- two requests to exercise the right of access to personal data (one from a former employee of Exprivia Projects Srl and the other from a former employee of Exprivia Telco&Media Srl, merged by incorporation into Exprivia SpA) in



accordance with Art. 15 of the GDPR.

In 2020, there were no information security incidents, classifiable as data breaches, compared with 2019 where there were two cases recorded, but for which the data controllers (Exprivia customers) judged that there were no risks for the rights and freedoms of natural persons and therefore decided not to notify the Privacy Watchdog, pursuant to art. 33 of the GDPR.

In 2020, as in the two previous years, there were no complaints with respect to Italtel Group companies from customers or other parties concerned as regards privacy, nor were there any incidents of disclosure, theft or loss of data.

In 2020, as in the two previous years, no Group company received any complaints for non-compliance with laws and regulations on the protection of personal data, nor were any sanctions imposed against them for infringements of such rules. As in the three previous years, no non-compliance with environmental laws or regulations was recorded. No sanction was issued for the violation of regulations, misleading advertising or anti-competitive behaviour in 2020, nor in 2019.

7.3 Training on business ethics

GRI indicator 205-2

Exprivia

In 2020, the 'Exprivia Ethics' training programme, aimed at encouraging knowledge and awareness of the Code of Ethics and 231 Model adopted by Exprivia, which was envisaged as a face-to-face course, was not held due to the health emergency and the company has equipped itself to run it digitally from 2021.

In 2020, as in the two previous years, Exprivia carried out training activities in the field of business ethics which involved around 28% of the workforce. The activities focused on occupational health and safety (pursuant to Italian Legislative Decree 81/08) and on Privacy and the introduction of the GDPR (General Data Protection Regulation), thus completing the 2018 programme with the aim of achieving full compliance with the obligations set by the new Privacy Regulation.

Italtel

In 2018 and in 2019 at Italtel SA (Spain), training in terms of business ethics covered 100% of the employees, while in 2020, trained staff represented 89%, since 2020 was characterised by the recruitment of a high number of personnel whose training, for organisational reasons, will be completed in 2021.

Moreover, in 2019, 100% of the staff of the Italtel Group received training on whistleblowing.

In 2020, the business ethics training plan envisaged for the personnel of the entire Italtel Group was launched but, because of the complex economic/financial situation experienced by Italy during the year, the plan suffered certain delays which extended its execution into 2021.

In 2020, a total of 11 management figures from the Italtel Group's foreign companies followed the business ethics training course, representing 79% of those who hold corporate office.

7.4 Internal controls

GRI indicator 205-3

Events which have given rise to disciplinary measures for corruption vis-à-vis the workers.

In 2020, as in 2019, there were no events which gave rise to disciplinary measures, nor were there any reports of episodes of corruption (not even potential) caused by the conduct of workers, compared with the 2 reports received by Exprivia in 2018.

In 2020, there were no events in the Italtel Group which gave rise to disciplinary measures, nor were there any reports of episodes of corruption (not even potential) caused by the conduct of workers.

7.5 Relations with the Public Administration

GRI indicator 201-4

Exprivia and Italtel maintain close relationships with the Public Administration. This is demonstrated by significant allocations received by the companies to support internal research and development activities, in the form of grants and subsidised loans.

Exprivia

In 2020, Exprivia received (i) grants totalling Euro 3 million (compared with the Euro 3.6 million received in 2019) and (ii) low-interest loan of Euro 709,000 (compared with the Euro 791,000 received in 2019).

Exprivia: 83 Entries in the Supplier Registers of Public Bodies in 2020.

In 2020, 40% of Exprivia's billing regarded contracts performed directly or in the interest of Public Bodies; the figure is consistent with the 39% recorded in 2019.

Italtel

In 2020, Exprivia received (i) grants totalling Euro 2.6 million (compared with the Euro 4.7 million received in 2019) and (ii) no low-interest loans like in 2019.

Italtel: 44 entries on the Suppliers Registers of Public Bodies in 2020. In 2020, Spegea scarl, as in the previous two years, is included in certain Suppliers Registers of Public Bodies (regional accreditation, Fondimpresa accreditation, Mepa, Empulia) and has relations with the Public Administration. In 2020, 42% of billing concerned training provided with public funds (including the European Social Fund), compared with 47% of billing in 2019. Moreover, in 2020, the training provided directly to the PA totalled 1%, compared with 1.4% in 2019.



8. Relationships with local areas

GRI indicators 102-12; 102-29

The Exprivia Group considers the maintenance of relations with the countries and with areas in which it has important venues in terms of size and heritage, as decisive for its activities. The Exprivia Group strives to contribute to the economic and social development of the communities to which it belongs, by communicating on a daily basis with a wide range of stakeholders. In particular, this is achieved by means of correct communication and marketing practices with a view to increasing relationships and shared value with local institutional, cultural and social communities, by reinforcing cooperation with local schools, associations and universities. The Group is aware that due to the dimensions it has achieved, the quality of its customers and its co-workers, it plays a leading role in the community in which it is inserted.

Donate differently: internal and local impact.

Exprivia, an Italian joint-stock company that handles the design and development of innovative software technologies and the provision of IT services for the banking, medical, industrial, telecommunications and Public Administration market, is coordinated by its top management, which draws up a budget annually to be used for donations. The rules of this budget change annually based on the strategic options enabled by its use. Each beneficiary activity is only financed if connected with the interests of the employees, with a continuous tension between the development of expertise and the exploration of soft skills. Exprivia thus enables an experiential stimulus, transforming charity actions into investments, without altering their form and positive effects for the beneficiaries.

8.1 Management activities and results

The network of participation

Attention towards the communities and local areas takes the form of dialogue and partnerships with all stakeholders and with national and local organisations. Many Group senior managers are involved in representation activities in bodies and organisations of public interest.

The Exprivia Group is part of the Italian industrial confederation system, and specifically it is involved in the governance and guidelines bodies of Confindustria Nazionale, Assinform and Confindustria Bari-BAT and the Governing Council of the National 'Cavalieri del Lavoro' Group and the Mezzogiorno Group, with the aim (besides the statutory one of belonging to a union of businesses) of furthering projects and initiatives which have positive impacts, also in terms of sustainability throughout the area of influence.

The Group is a member of networks of businesses and universities, permanent consortia and temporary joint ventures of various interest for the area, generally aimed at the performance of research and development activities, fostering of young entrepreneurs and business innovation.

Project or convention-related activities, structured by area of interest and by business sector.

The Exprivia Group is constantly committed to supporting corporate and business initiatives of national and international standing. In particular, Exprivia supported various initiatives in 2020, structured by area of interest and by business sector, despite the fact that the 'world of events' was greatly hindered by the outbreak of the COVID-19 health emergency, which led to the gradual cancellation of physical events at both national and international level. However, this caused an increase in virtual events, carried out using platforms such as Cisco Web ex.



Events by proponent	2020	2019	2018
Staff	49	107	71
Markets	38	68	30
Total	87	175	101

The chart shows that there were a good number of events promoted by the Staff area. Considering the period characterised by the pandemic, the staff, and especially the Communication Area, provided significant support to the various business areas, with the organisation of remote webinars.

Events by type	2020	2019	2018
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Corporate Brand	37	94	65
Business	50	81	36
TOTAL	87	175	101

This chart shows, for 2020, a preference for business initiatives (around 60% of the total), aimed at informing the market of the new features regarding solutions, skills and innovative services with the objective of increasing business in the reference sector and promoting the ongoing partnerships. Then come the initiatives which promote the brand in order to boost its visibility and prestige, the value of which is only a little lower than the business events.

During a year marked by the Coronavirus pandemic, the Exprivia Group confirmed its support to cultural initiatives, reiterating the importance of culture as a fundamental asset for humanity, even for a technological company. Culture and knowledge further innovation and vice versa, therefore it is the Exprivia Group's conviction that each company has the duty to imagine and plan the future and, when possible, anticipate it. Also through the development of cultural initiatives.

The Group supports various cultural events of local and national importance. Because of the pandemic, the sports initiatives supported by the Group in the past did not take place. It is also the sponsor of initiatives aimed at developing the culture of agents and employees as well as the citizens in the areas in which it operates.

The following list shows the most significant cultural initiatives that the Group supported during 2020:

- **Il Libro Possibile Festival**, 8-11 July 2020, Polignano a Mare (BA);
- **Conversations from the Sea**, 11 July 2020, Molfetta (BA);
- **COVID-19: which Puglia awaits us?** 16 July 2020, Puglia
- **'Responsibility' discussed at the Dialoghi di Trani**, 23-27 September 2020 (19th edition) - Trani and surrounding area;
- **Festival of the Economy in Trento**, 24-27 September 2020, Trento
- **History Lessons**, 18 October 2020, Bari

In 2020, after China, Italy was one of the first countries in the world to be hit by the pandemic, with soaring infection and death rates. In March 2020, Italy became the first western country to impose a lockdown, initially in specifically defined areas and then nationally. Our hospitals were on the front line in managing the health emergency and seeking to isolate and study the virus. Northern Italy, and Lombardy in particular, faced a particularly grave crisis which put great strain on the health system.

Exprivia

Following the difficulties faced by our country, Exprivia, with strong local roots, made a swift contribution with solidarity-based initiatives and helped raise the awareness of its workforce by making useful tools available.

Specifically, in March 2020, Exprivia donated a few PCs to the Municipality of Bari, in conjunction with the cooperative ReHardWareing in Rutigliano, in order to speed up the processes of the public administration and make the service easily accessible for citizens.

In order to protect cybersecurity, particularly exposed during the pandemic emergency, Exprivia has signed up to the digital solidarity initiative. Through the Cybersecurity team, it has offered companies a free consultancy service through a system that evaluates exposure to cyber threats.

In order to tackle this difficult time, Exprivia has also supported the public administrations with a free service dedicated to citizens, so they can keep up-to-date and informed as regards current ministerial regulations. The project, carried out in cooperation with QuestIT, concerned the creation of an intelligent virtual assistant, called Rita, available 24/7. A number of municipalities from around the region immediately expressed an interest in the project. The free virtual assistant has

enabled citizens to obtain answers to the range of questions arising from the regulations.

In May 2020, in order to raise citizens' awareness and inform them about the pandemic situation, Exprivia worked with the Federation of Italian medical and scientific companies on implementing an app entitled 'I am staying at home', which allowed citizens to check themselves for COVID-19 symptoms and assess their behaviour.

Against this socio-economic and political background, the Group continued its social responsibility activities, participating in certain solidarity events:

- La casa del giocattolo solidale, Varese, December 2020
- La casa delle Bambine e dei Bambini di Bari, December 2020

Italtel

In this situation, Italtel made a specific contribution to the functioning and capacity of the hospitals to cope with the emergency. Right from the start of the pandemic, its technicians worked in the field at various hospitals in Lombardy, including the new General Hospital at the Fiera di Milano to create, on a tight timescale, the network infrastructure needed to upgrade critical care, expand the wards to ensure distancing rules were respected and set up zones for patients awaiting discharge after overcoming the acute phase of the illness.

Italtel, through a joint initiative with the Trade Unions, launched a fundraising initiative among its employees for hospitals on the front line of the battle against the pandemic. The overall amount collected through personal donations was then matched by the company.

Two hospitals were chosen to receive the funds raised, which were divided into two equal amounts: the Papa Giovanni XXIII Hospital in Bergamo and the Spallanzani Hospital in Rome. The province of Bergamo was one of the areas most affected during the initial phase of the emergency. At national level, the Spallanzani Hospital represents the main centre of reference for research against infectious diseases, and experience has shown that it is only through research that we will be able to find lasting solutions to overcome this epidemic.

In addition to a concrete, financial aim, the initiative also had a symbolic purpose: to express Italtel's thanks to all the medical and paramedical staff who, with a great sense of self-denial, sacrifice and generosity, have gone into work every day to manage the awful situation that has afflicted our country so terribly.

In March 2020, at the beginning of the lockdown caused by the health emergency, schools suspended face-to-face activities and, using various procedures according to each school or college's capacity to respond to the crisis, gradually introduced remote teaching. This made it difficult or even impossible for students from families facing financial or social hardship to access education. By donating some laptops, Italtel supported the project launched by the Project for People non-profit-making institution, which requested used company PCs to enable children in vulnerable situations to attend lessons remotely. The Project for People non-profit-making association's project was carried out in conjunction with the Tempo per l'Infanzia Cooperative, Milan schools and the teachers who work with Project for People to support education services for children in difficulties.

GRI link table

GRI indicator 102-55

General Standard Disclosure	Disclosure	Description of the indicator	Pages
General Disclosures	GRI 102-1	Name of the organization	5
	GRI 102-2	Activities, brands, products, and services	9
	GRI 102-3	Location of headquarters	15
	GRI 102-4	Location of operations	15
	GRI 102-5	Ownership and legal form	5
	GRI 102-6	Markets served	9
	GRI 102-8	Information on employees and other workers	30-36
	GRI 102-9	Supply chain	26
	GRI 102-12	External initiatives	58
	GRI 102-15	Key impacts, risks, and opportunities	23
	GRI 102-16	Values, principles, standards, and norms of behaviour	23
	GRI 102-17	Mechanisms for advice and concerns about ethics	23
	GRI 102-18	Governance structure	22
	GRI 102-29	Identifying and managing economic, environmental, and social impacts	50
	GRI 102-30	Effectiveness of risk management processes	23
	GRI 102-45	Entities included in the consolidated financial statements	5
	GRI 102-46	Defining report content and topic Boundaries	5
	GRI 102-47	List of material topics	17
	GRI 102-50	Reporting period	5
	GRI 102-55	GRI content index	62
GRI 102-56	External assurance	65	
Economic Performance	GRI 201-4	Financial assistance received from government	57
Market Presence	GRI 202-2	Proportion of senior management hired from the local community	31
Procurement Practices	GRI 204-1	Proportion of spending on local suppliers	28
Anti-corruption	GRI 205-2	Communication and training about anti-corruption policies and procedures	56
	GRI 205-3	Confirmed incidents of corruption and actions taken	56

Anti-competitive Behaviour	GRI 206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	23
Tax	GRI207-1	Approach to tax	28
	GRI 207-2	Tax governance, control and risk management	28
Energy	GRI 302-1	Energy consumption within the organisation	51
Emissions	GRI 305-1	Direct (Scope 1) GHG emissions	52
	GRI 305-2	Energy indirect (Scope 2) GHG emissions	52
	GRI 305-3	Other indirect (Scope 3) GHG emissions	53
	GRI 305-4	GHG emissions intensity	53
Effluents and Waste	GRI 306-1 ⁷	Water discharge by quality and destination	53
	GRI 306-2 ⁸	Waste by type and disposal method	53
Environmental Compliance	GRI 307-1	Non-compliance with environmental laws and regulations	54
Supplier Environmental Assessment	GRI 308-1	New suppliers that were screened using environmental criteria	28
Employment	GRI 401-1	New employee hires and employee turnover	38
	GRI 401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	38
	GRI 401-3	Parental leave	41
Labor/Management Relations	GRI 402-1	Minimum notice periods regarding operational changes	37
Occupational Health and Safety	GRI 401-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	34
Training and Education	GRI 404-1	Average hours of training per year per employee	41
	GRI 404-2	Programs for upgrading employee skills and transition assistance programs	41

⁷ As a non-material topic, the indicator is partially covered.

⁸ As a non-material topic, the indicator is partially covered.

	GRI 404-3	Percentage of employees receiving regular performance and career development reviews	45
Diversity and Equal Opportunity	GRI 405-1	Diversity of governance bodies and employees	31
Marketing and Labelling	GRI 417-1	Requirements for product and service information and labeling	54



Report by the Independent Auditors

GRI indicator 102-56



Exprivia S.p.A.

Relazione della società di revisione
indipendente sulla dichiarazione
consolidata di carattere non finanziario
ai sensi dell'art. 3, c. 10, d.lgs. 254/2016
e dell'art. 5 regolamento CONSOB n.
20267 del gennaio 2018

Bilancio d'esercizio al 31 dicembre 2020

Protocollo RC082682020BD2421

Relazione della società di revisione indipendente sulla dichiarazione consolidata di carattere non finanziario ai sensi dell'art. 3, c. 10, d.lgs. 254/2016 e dell'art. 5 regolamento CONSOB n. 20267 del gennaio 2018

Al Consiglio di Amministrazione di Exprivia S.p.A.

Ai sensi dell'articolo 3, comma 10, del Decreto Legislativo 30 dicembre 2016, n. 254 (di seguito "Decreto") e dell'articolo 5 del Regolamento CONSOB n. 20267/2018, siamo stati incaricati di effettuare l'esame limitato ("*limited assurance engagement*") della dichiarazione consolidata di carattere non finanziario di Exprivia S.p.A. e sue controllate (di seguito il "Gruppo") relativa all'esercizio chiuso al 31 dicembre 2020 predisposta ex art. 4 Decreto, e approvata dal Consiglio di Amministrazione in data 30 aprile 2021 (di seguito "DNF").

Responsabilità degli Amministratori e del Collegio Sindacale per la DNF

Gli Amministratori sono responsabili per la redazione della DNF in conformità a quanto richiesto dagli articoli 3 e 4 del Decreto e ai "Global Reporting Initiative Sustainability Reporting Standards" definiti nel 2016 dal GRI - Global Reporting Initiative (di seguito "GRI Standards"), con riferimento alla selezione di GRI Standards, da essi individuato come standard di rendicontazione.

Gli Amministratori sono altresì responsabili, nei termini previsti dalla legge, per quella parte del controllo interno da essi ritenuta necessaria al fine di consentire la redazione di una DNF che non contenga errori significativi dovuti a frodi o a comportamenti o eventi non intenzionali.

Gli Amministratori sono responsabili inoltre per l'individuazione del contenuto della DNF, nell'ambito dei temi menzionati nell'articolo 3, comma 1, del Decreto, tenuto conto delle attività e delle caratteristiche del Gruppo e nella misura necessaria ad assicurare la comprensione dell'attività del Gruppo, del suo andamento, dei suoi risultati e dell'impatto dallo stesso prodotti.

Gli Amministratori sono infine responsabili per la definizione del modello aziendale di gestione e organizzazione dell'attività del Gruppo, nonché, con riferimento ai temi individuati e riportati nella DNF, per le politiche praticate dal Gruppo e per l'individuazione e la gestione dei rischi generati o subiti dallo stesso.

Il Collegio Sindacale ha la responsabilità della vigilanza, nei termini previsti dalla legge, sull'osservanza delle disposizioni stabilite nel Decreto.

Indipendenza della società di revisione e controllo della qualità

Siamo indipendenti in conformità ai principi in materia di etica e di indipendenza del *Code of Ethics for Professional Accountants* emesso dall'*International Ethics Standards Board for Accountants*, basato su principi fondamentali di integrità, obiettività, competenza e diligenza professionale, riservatezza e comportamento professionale. La nostra società di revisione applica l'*International Standard on Quality Control 1 (ISQC Italia 1)* e, di conseguenza, mantiene un sistema di controllo qualità che include direttive e procedure documentate sulla conformità ai principi etici, ai principi professionali e alle disposizioni di legge e dei regolamenti applicabili.

Responsabilità della società di revisione

È nostra la responsabilità di esprimere, sulla base delle procedure svolte, una conclusione circa la conformità della DNF rispetto a quanto richiesto dal Decreto e dai GRI Standard. Il nostro lavoro è stato svolto secondo quanto previsto dal principio “*International Standard on Assurance Engagements ISAE 3000 (Revised) - Assurance Engagements Other than Audits or Reviews of Historical Financial Information*” (di seguito “*ISAE 3000 Revised*”), emanato dall’*International Auditing and Assurance Standards Board (IAASB)* per gli incarichi *limited assurance*. Tale principio richiede la pianificazione e lo svolgimento di procedure al fine di acquisire un livello di sicurezza limitato che la DNF non contenga errori significativi. Pertanto, il nostro esame ha comportato un’estensione di lavoro inferiore a quella necessaria per lo svolgimento di un esame completo secondo l’*ISAE 3000 Revised* (“*reasonable assurance engagement*”) e, conseguentemente, non ci consente di avere la sicurezza di essere venuti a conoscenza di tutti i fatti e le circostanze significativi che potrebbero essere identificati con lo svolgimento di tale esame.

Le procedure svolte sulla DNF si sono basate sul nostro giudizio professionale e hanno compreso colloqui, prevalentemente con il personale della società responsabile per la predisposizione delle informazioni presentate nella DNF, nonché analisi di documenti, ricalcoli ed altre procedure volte all’acquisizione di evidenze ritenute utili.

In particolare, abbiamo svolto le seguenti procedure:

1. analisi dei temi rilevanti in relazione alle attività ed alle caratteristiche dell’impresa rendicontati nella DNF, al fine di valutare la ragionevolezza del processo di selezione seguito alla luce di quanto previsto dall’art. 3 del Decreto e tenendo presente lo standard di rendicontazione utilizzato;
2. analisi e valutazione dei criteri di identificazione del perimetro di consolidamento, al fine di riscontrarne la conformità a quanto previsto dal Decreto;
3. comparazione tra i dati e le informazioni di carattere economico-finanziario incluse nella DNF ed i dati e le informazioni inclusi nel Bilancio Consolidato del Gruppo Exprivia;
4. comprensione dei seguenti aspetti:
 - modello aziendale di gestione e organizzazione dell’attività del Gruppo, con riferimento alla gestione dei temi indicati nell’art. 3 del Decreto;
 - politiche praticate dall’impresa connesse ai temi indicati nell’art. 3 del Decreto, risultati conseguiti e relativi indicatori fondamentali di prestazione;
 - principali rischi, generati o subiti connessi ai temi indicati nell’art. 3 del Decreto.

Relativamente a tali aspetti sono stati effettuati inoltre i riscontri con le informazioni contenute nella DNF e effettuate le verifiche descritte nel successivo punto 5, lett. a).

5. comprensione dei processi che sottendono alla generazione, rilevazione e gestione delle informazioni qualitative e quantitative significative incluse nella DNF. In particolare, abbiamo svolto interviste e discussioni con il personale della Direzione di Exprivia S.p.A. e abbiamo svolto limitate verifiche documentali, al fine di raccogliere informazioni circa i processi e le procedure che supportano la raccolta, l’aggregazione, l’elaborazione e la trasmissione dei dati e delle informazioni di carattere non finanziario alla funzione responsabile della predisposizione della DNF.

Inoltre, per le informazioni significative, tenuto conto delle attività e delle caratteristiche del Gruppo:

- a livello di Capogruppo,
 - a) con riferimento alle informazioni qualitative contenute nella DNF, e in particolare a modello aziendale, politiche praticate e principali rischi, abbiamo effettuato interviste e acquisito documentazione di supporto per verificarne la coerenza con le evidenze disponibili;
 - b) con riferimento alle informazioni quantitative, abbiamo svolto sia procedure analitiche che limitate verifiche per accertare su base campionaria la corretta aggregazione dei dati.

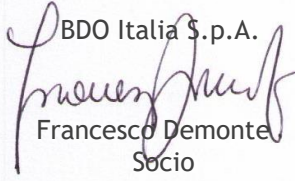
Conclusioni

Sulla base del lavoro svolto, non sono pervenuti alla nostra attenzione elementi che ci facciano ritenere che la DNF del Gruppo Exprivia relativa all'esercizio chiuso al 31 dicembre 2020 non sia stata redatta, in tutti gli aspetti significativi, in conformità a quanto richiesto dagli articoli 3 e 4 del Decreto e dai GRI Standards selezionati.

Richiamo d'informativa

Richiamiamo l'attenzione sul paragrafo "Nota metodologica" della DNF che indica che, con riguardo alla situazione di tensione finanziaria in cui si è venuta a trovare Italtel, il documento è stato rivisto qualitativamente per assicurare coerenza dei contenuti e delle informazioni fornite in previsione dell'approvazione in data 30 aprile 2021. Le nostre conclusioni non sono espresse con rilievi in relazione a tale aspetto.

Bari, 2 giugno 2021



BDO Italia S.p.A.
Francesco Demonte
Socio